

The Farm Consultancy Group
Whitelands Cottage,
Days Lane
Kington Langley
Chippenham
SN15 5PD
14/01/2026

Dear Sir/Madam,

Re: Application to Amend the Approved Siting of the Temporary Rural Worker's Dwelling at Carpenters Farm, Avon, Chippenham, Wiltshire, SN15 4LS

I am writing on behalf of IC, CA & JC Carter to support a minor relocation of the temporary rural worker's dwelling previously granted planning permission in 2024. The application seeks consent to move the approved static caravan 42 metres northeast of its currently approved position, within the same farmyard, in order to facilitate essential farm expansion.

Since the original application was approved, the business has reviewed its infrastructure needs and identified the requirement for an additional building to support the continued viability of the farming enterprise. The area currently approved for the siting of the worker's dwelling is the only suitable location for a new building, given existing building arrangements, access routes, and yard layout. The proposed relocation is therefore necessary to ensure the farm can continue to function efficiently while maintaining appropriate standards for both the farm and its staff.

The revised siting remains in close proximity to the existing livestock buildings, (which is essential for meeting the functional need established in the original justification), and does not alter the scale, design, or purpose of the approved dwelling. Importantly, the new position does not alter visual or landscape impact in any way, remains outside the floodplain, and continues to provide a safe and practical living environment for the agricultural worker and their family. Access arrangements are unchanged and will continue to utilise the existing established route, avoiding movement through the busy centre of the farmyard.

For completeness and to assist the Council in confirming that the functional and financial justification remains unchanged, we have attached the original Agricultural Justification and Planning Statement which supported the previous successful application, as well as the Approval of Full Planning Permission with Conditions from Wiltshire Council, below this letter. All circumstances relating to the need for a full-time worker to reside on site remain valid. The only amendment sought is the physical repositioning of the caravan to enable essential operational development.

Please do not hesitate to contact me should you require any further information.

Yours sincerely,

George Drewett
The Farm Consultancy Group

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01249 750151

The **Farm Consultancy** Group



**A Planning Statement addressing Design,
Access and Agricultural Justification to
Support a Planning Application for a Farm
Workers Dwelling**

**At Carpenters Farm, Avon, Chippenham,
Wiltshire, SN15 4LS**

**Prepared by Jessica Rippon
Of The Farm Consultancy Group**

Planning Statement addressing Design, Access and Agricultural Justification to Support a Planning Application for a Farm Workers Dwelling at Carpenters Farm, Avon, Chippenham, Wiltshire, SN15 4LS

1. Introduction

This report has been prepared by Jessica Rippon of *The Farm Consultancy Group (WhiteAvon Consultancy Limited)* on behalf of IC, CA & JC Carter to confirm agricultural justification for a rural worker's dwelling to be installed at Carpenters Farm, Avon, Chippenham, Wiltshire, SN15 4LS. This report should be read in conjunction with the planning application and plans submitted by Jessica Rippon of The Farm Consultancy Group.

This report has been produced based on information provided by the client, farm records and standard costings data where appropriate.

This report provides justification for a temporary dwelling to be permanently located on site for a farm worker.

2. Backgroundstanding

The applicants, IC, CA & JC Carter are a family farming partnership comprising of Carolyne, Irving and their son Joe. The partnership has been running for several generations and operates a dairy enterprise, and this has expanded considerably over the last 10 years. Significant investment has been made in the buildings and infrastructure, in addition to this, a block of land was purchased to enable a secure source of forage for the milking herd.

The farm comprises of 110 Hectares of owned land, along with land rented locally in a mix of long-term and annual agreements for growing maize. The cattle numbers have increased from 250 up to 300 in recent years. The decision has been made not to continue with the planned increase of the herd any further at this moment in time, due to the volatile milk price and challenges around input costs that are affecting dairy businesses across the UK. The margins made from the farm will not allow for the expansion of sheds, silage pits and extra forage needed for the increased number of cows, and the farming partnership decided they do not have the borrowing capacity to cover this at this time.

All youngstock is reared off site, by a nearby farmer on a site unlinked to Carpenters Farm. Calves are born at Carpenters Farm and then transferred to the rearing unit within 10 days and then returned as heifers prior to calving.

The business is a progressive dairy farm, Joe has been in the business since leaving school some 15 years previous, with the experience and skill set to continue to expand the farm. The staff currently on the farm include Joe, who lives in an agriculturally tied dwelling on the farm (planning permission seen in row one of the below table), one staff member living in a mobile home on the farm and a further two staff members living in offsite accommodation locally. Joe's parents (Carolyne and Irving) live in the main farmhouse, though both have taken a step back from manual labour due to ill health but are still involved in the financial running of the business.

Planning history

Planning Application	Application Type	Proposal	Date
PL/2023/03711	Full planning permission	Erection of 3 bay farmers garage with farm office and farm meeting room and archive.	09/05/2023
21/02322/APD	Agricultural & Forestry - Detailed matters	Track which will be used to move cattle and agricultural machinery between parcels, avoiding compaction and damage to the soil.	05/03/2021
19/04101/APD	Agricultural & Forestry - Detailed matters	Erection of agricultural storage building.	25/04/2019
18/06851/OUT	Outline Planning	The erection of a farm workers dwelling	24/07/2018

18/07198/FUL	Full planning permission	Retention of mobile home for use by an agricultural worker for a 5 year period	31/07/2018
16/07134/FUL	Full planning permission	Proposed dirty water/slurry lagoon	21/07/2016
14/06582/FUL	Full planning permission	Extension to Barn	07/07/2014

3. Planning Policy

The National Planning Policy Framework published in December 2023 outlines that planning policies should support sustainable and economic growth in rural areas by taking a positive approach to new development. Planning strategies should maintain a prosperous rural economy including policies to support the sustainable growth of rural businesses. It should promote the development and diversification of agricultural businesses and support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors which respect the character of the countryside.

The framework lists that local planning authorities should avoid isolated homes in the countryside unless there are special circumstances such as the essential need for a rural worker to be available at most times at or near their place of work in the countryside.

In the county of Wiltshire, the Wiltshire Core Strategy runs alongside the NPPF and PPG, the core strategy outlines a sustainable spatial strategy for future development in the county.

Prior to the National Planning Policy Framework the development of the Countryside was detailed in the Planning Policy Statement 7 (PSS 7).

The grounds covering planning permission for Agricultural Dwellings were set out in Annex A of PPS 7, this set out the agricultural requirements that need to be fulfilled if a permanent dwelling is to be permitted, these are:

- Clear functional need.
- The need relates to full time workers who are predominantly employed within the agricultural sector and does not relate to a part time requirement.
- The agricultural activity concerned has been established for at least three years, proved profitable for at least one, are currently financially sound and have a clear prospect of remaining so.
- The functional need could not be fulfilled by another dwelling on the unit or locally.
- Normal planning requirements are satisfied.

4. The Proposal

There is currently a static caravan located in the middle of the farmyard housing one of the members of staff employed on the farm. This application is to grant permission for a temporary dwelling, on the edge of the yard to replace this static caravan.

The farm wants to upgrade the accommodation and move it out from the centre of the farmyard to a safer location. This would not only benefit the current worker and her young son, but also make the farm more attractive for future employees. This in the long run would help the farm to expand in the future by attracting good employees. The dairy industry is facing difficulties attracting and securing good employees, this is having a negative affects on individual businesses as skilled workers are needed. Ensuring these workers have a good quality of life and appropriate accommodation is necessary to attract a better quality of staff.

The static caravan is currently based adjacent to where the milk tanker comes to collect milk, with the tanker reversing alongside the caravan. This is clearly very dangerous, especially as there is a young child living in this accommodation with the farm worker.

The new proposed location of the accommodation will be behind the newly built house Joe Carter and his family live in, beyond the garden boundary so that privacy for both dwellings can be maintained, whilst ensuring the are still within close enough distance of the cattle to respond to any needs.

The access to this proposed location will follow the same access as the new build and will ensure access is not through the middle of the farmyard, again improving the safety for the farm worker. This is the only other viable location on farm for accommodation to go, due to flood plain land and being mindful of future farm development plans.

5. Design & Access

Detailed drawings of the proposed temporary dwelling can be found in accompanying documents for this application submitted by Jessica Rippon of The Farm Consultancy Group. The dwelling will be of a size and scale that is commensurate with the needs of a rural worker.

Access to this temporary accommodation will be by the main farm yard and existing access point.

6. Land and Buildings

Plans of the farm can be found in Appendix 1.

As seen in the table below, the current housing requirement of all the animals on the farm extends to 2040 Square meters. The existing buildings at Carpenters Farm extend to approximately 4149 Square meters of accommodation, therefore, will be sufficient for the number of livestock on farm. All youngstock is reared offsite and returns before calving.

	M2 Per Animal	No. Animals	Total Space Req. M2
Dairy Cows			
Kennels or Cubicle house, including a proportion of feeding areas and passages	6.8	300	2040
		Total M2 Requirement	2040

Existing buildings at Carpenters Farm

16m x 42m – 672m²- Silage pit

15m x 42m – 630m²-Silage pit

12x 42m –504m² -Silage pit

= 4167 tonnes of silage stored

18m x 30.3m – 546m² - Straw barn

36.36m x 36.36m – 1322m² - Cattle housing

9m x 36.36m -327m² – Cattle housing

9m x 36.36 – 327m²- Parlour/collecting area

88m x 21m – 1,848 - Cattle housing and general storage

42m x 6m –252m² – Cattle housing and general storage

13.6m x 5.4m -73m² – Cattle housing and general storage

Total cattle housing – 4,149m²

7. Functional Test

All figures for labour requirements have been obtained from 'The Agricultural Budget and Costings Book – 96th Edition' (May 2023) by Agro Business Consultants.

The table beneath illustrates the labour requirements of the business. Update SMD with cropping

Labour Requirement- Dairy Unit	Number of animals/ hectares	Standard Man- Days required (per animal)	Enterprise Total
Dairy Cows	300	3.75	1125
Grassland	85	1.6	136
Arable/Maize	25	0.5	12.5
15% Farm Maintenance			189.2
Total Enterprise Requirement			1462.7
	Requirement per person		275
	Total Labour Requirement		5.32

A labour unit of one person is assumed to work 2,200 hours per year. These total hours are converted into 275 notional 'Standard Man Days' of 8 hours (ABC, 2022). PPS7 is no longer a material consideration however to assist the Council in their decision making, the statement required an enterprise to show an essential need for the proper functioning of the enterprise for at least one rural worker to be readily available on site at most times. Paragraph 4 (i) of Annex A referred to the example of animals requiring essential care at short notice, and in 4 (ii) to the ability to deal quickly with emergencies that could otherwise cause serious loss.

The proper functioning of a livestock farm requires that skilled stock attendants are available at very short notice at any time of the day or night. Practically, there is a requirement for two people to be available for most tasks. This is especially important at night when any daytime staff have gone home.

At current cattle numbers there is a requirement for 5.32 full time labour units. This is the existing situation with Joe and the current employee providing the functional requirement overnight. If Joe leaves the farm, his parents are unable to carry out this requirement and this would only leave one employee onsite to assist with the cattle. This would not be sufficient, in many situations there is a requirement for 2 people to be involved in a calving or any other unforeseen livestock operation that requires urgent assistance. If one labour unit requires the evening off or is not well it is integral there is a second person readily available on site to assist with any emergencies.

8. Financial Viability of the Unit

IC, CA & JC Carter have been running a successful business to date with sufficient profits to cover the required drawings and reinvestment within the business.

This is confidential information, that the client has requested is kept out of public view and accounts can be submitted upon request.

9. Proper Functioning

The cattle calve all year round, resulting in a higher labour need due to the significant number of calves born. The cattle due to calve always require close supervision and will also require close supervision immediately after calving to ensure no complications occur, such as mastitis or infections. Due to cattle being unpredictable animals, and the extra stress they are under around calving time, it is essential that at least two members of staff are available for most jobs, to ensure safety. It is also essential that calves receive colostrum within the first few hours after birth, due to this, calves may need to receive colostrum in the middle of the night, therefore someone needs to be around to administer this.

Calves will be on farm up until 10 days old, and during this time they will be weaned onto a milk replacement powder type feed. It is important to be able to spot stress in calves from when they change from whole milk to milk powder feeding and train calves to the bucket feeding system. It will prove vital that all housed calves are regularly inspected and monitored as their welfare depends on frequent human attention. Calves are susceptible to several health problems that require rapid attention such as viral diseases, pneumonia, bloat

and scour, all of which need to be detected early and immediately treated if losses are to be avoided. The Code of Recommendation for the Welfare of Livestock (Cattle) states that 'it is particularly important that you watch calves regularly for signs of diarrhoea or respiratory disease.'

Farm Assurance Codes of Practice require that suitable trained persons are available 24 hours a day and the Government's Strategy for Food and Farming states that 'high standards of animal health and welfare are important because they are a vital part of producing safe food and because we care about how animals are treated. High standards are also essential for the economic success of the industry.

Appropriately skilled workers will need to be living on site to be available at short notice to manage the animals' health and welfare. The Code of Recommendation for the Welfare of Livestock (Cattle) states that 'no matter how acceptable a system may be in principle, without competent, diligent stockmanship, the welfare of animals cannot be adequately catered for.'

The Welfare of Farmed Animal Regulations stress that animals which appear to be ill or injured shall be cared for appropriately without delay and that action should be taken immediately if any animals are injured or appear ill or distressed. From a financial perspective it is also vital to the success of the business that any losses are kept to an absolute minimum. Adequate and timely supervision at all times is therefore essential.

To enable good staff to be available on farm 24 hours a day, it is important, in any farming business, that the accommodation is of a sufficient standard. In relation to this business, the existing mobile home is in a dangerous location, and needs to be moved to the other side of the yard and upgraded. This will provide the farm with sufficient accommodation.

10. Availability of Other Houses

When considering the essential need for a rural worker's dwelling, it is important to assess the availability of other properties in the vicinity. The business has no other property available to it that is appropriate for the employee, and so this proposal is integral to the continued success of IC, CA & JC Carter.

The main farmhouse is occupied by Irving and Carolyn Carter and a secondary tied dwelling is occupied by Joe and his family. The practical need for two-able bodied and skilled stockman to be onsite is necessitating the need for a third dwelling. The case of *Keen V SSE Aylesbury Vale DC 1995* demonstrates a case where the need for a dwelling (which has been proven) cannot be fulfilled by an existing dwelling when occupied by someone winding down their farming careers, and they should not be expected to leave their home and alternative accommodation should therefore be provided for the additional necessary worker.

There are no houses, with appropriate planning, within a suitable distance offered for sale or rent at a suitable price which is affordable for the business. The upgrading of the existing static caravan will not have any significant impact on the character and appearance of the countryside, and if anything will improve the appearance and usefulness of this area of the yard. The location of this dwelling has been thoroughly thought through in terms of access to both the dairy unit and off the farm.

There is a need for at least two people to be available on site 24 hours a day and a dwelling in a nearby village cannot satisfy this requirement.

If the farm business was sold in the future, it is likely there would be a functional requirement for this accommodation on the holding, which is of significant size and will always remain as a dairy farm, due to the building design and considerable investment made in the past. However, the proposal is for a static caravan, so could, if necessary, be removed from the site.

11. Conclusion

In conclusion, The Carter family are hardworking, progressive and conscientious people who have built up a successful business over the years. The profits on the enclosed accounts and proposed budgets are significant and prove that the business is sustainable now and will be in the future.

The temporary dwelling will be required for a member of staff to be available on site for functional requirement. Many tasks require two people, and when Joe is off farm, it is important that there is one labour unit available, especially when daytime staff have finished and gone home. The business meets the financial and functional test and needs this dwelling to accommodate a further labour unit living on site. Due to the danger of the current location of the static caravan it is also integral that the location of the accommodation is changed. These permissions are integral to the future success of the business.



The Town and Country Planning Act 1990
Approval of Full Planning Permission with Conditions
Application Reference Number: PL/2024/08753
Decision Date: 22/04/2025

Applicant:	Mr Joseph Carter Carpenters Farm Avon, Avon, Wiltshire, SN15 4LS
Particulars of Development:	Static caravan for accommodating agricultural workers
At:	CARPENTERS FARM, AVON, CHIPPENHAM, SN15 4LS

In pursuance of its powers under the above Act, the Council hereby **GRANT PLANNING PERMISSION** for the above development to be carried out in accordance with the application and plans submitted (listed below).

In accordance with paragraph 39 of the National Planning Policy Framework, Wiltshire Council has worked proactively to secure this development to improve the economic, social and environmental conditions of the area.

Subject to the following conditions:

Conditions

- 1 The works for which Planning Permission is hereby granted shall be begun before the expiration of three years from the date of this consent.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990, amended by the Planning and compulsory Purchase Act 2004.

2

The development hereby permitted shall be carried out in accordance with the following approved plans:

Location Plan (received 17/02/2025)

Site Plan (received 17/02/2025)

24/0103/2: Proposed Static Caravan Plans & Elevations (received 24/09/2024)

REASON: For the avoidance of doubt and in the interests of proper planning.

3

The occupation of the temporary accommodation hereby approved shall be limited to a person solely or mainly working, or last working, in the locality in agriculture or in forestry, or a widow or widower of such a person, and to and resident dependants.

REASON: The site is in an area where residential development for purposes other than the essential needs of agriculture is not normally permitted and this permission is only granted on the basis of an essential need for a new dwelling/residential accommodation in this location having been demonstrated.

4

The mobile home hereby approved, and any ancillary works or structures, shall be removed and the land restored to its former condition on or before five years after the date of its decision notice in accordance with a scheme to be submitted to and approved by the Local Planning Authority beforehand.

REASON: The structure to which this permission relates is temporary in nature and is not considered to be a structure that would be suitable in this rural location on a permanent basis. Consideration has been given to the particular circumstances of the applicant so as to allow accommodation to be made available to support the existing business on a temporary basis only

5

The existing unauthorised mobile home shall be permanently removed from the farm (Carpenters Farm) within 4 months of the date of first occupation of the temporary accommodation hereby approved or within 8 months of the date of this planning permission, whichever is the sooner.

REASON: In order to protect the character and appearance of the area and to limit further residential development on the site.

INFORMATIVE: This condition is necessary to ensure that the existing unauthorised mobile home is removed as soon as is practical whilst allowing a reasonable timeframe for the new temporary accommodation to be installed. The Applicant is reminded that the existing mobile home remains unauthorised since the lapsing of planning permission 18/07198/FUL.

6

No external lighting shall be installed on-site unless otherwise agreed in writing by the local planning authority. Details should include plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals in their publication "The Reduction of Obtrusive Light" Guidance Note 01/21 (reference GN01/21). The approved lighting shall be installed and shall be maintained in accordance with the approved details and no additional external lighting shall be installed.

REASON: In the interests of conserving biodiversity and in the interests of the amenities of the area and to minimise unnecessary light spillage above and outside the development site.

- 7 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended by the Town and Country Planning (General Permitted Development) (Amendment) (No.3) (England) Order 2020 (or any Order revoking or re-enacting or amending that Order with or without modification), no hardstanding, buildings or structures, or gate, wall, fence or other means of enclosure, other than those shown on the approved plans, shall be erected or placed anywhere on the site.
REASON: To safeguard the character and appearance of the area.

Informatives

- 1 The applicant is requested to note that this permission does not affect any private property rights and therefore does not authorise the carrying out of any work on land outside their control. If such works are required it will be necessary for the applicant to obtain the landowners consent before such works commence.

If you intend carrying out works in the vicinity of the site boundary, you are also advised that it may be expedient to seek your own advice with regard to the requirements of the Party Wall Act 1996.

- 2 Any alterations to the approved plans, brought about by compliance with Building Regulations or any other reason must first be agreed in writing with the Local Planning Authority before commencement of work.
- 3 The applicant should note that the grant of planning permission does not include any separate permission which may be needed to erect a structure in the vicinity of a public sewer. Such permission should be sought direct from Thames Water Utilities Ltd / Wessex Water Services Ltd. Buildings are not normally allowed within 3.0 metres of a Public Sewer although this may vary depending on the size, depth, strategic importance, available access and the ground conditions appertaining to the sewer in question.
- 4 Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

Wiltshire Council's land drainage bylaws can be downloaded here. The land drainage consent application form and guidance notes can be found on our website

- 5 The applicant is reminded that after the five year period, if it is considered that there continues to be a need for an agricultural workers dwelling on this site, planning permission will expected to be sought, in support of which the Local Planning Authority will likely expect evidence of a continued functional and financial need to be made available for consideration.
- 6 The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for development of land in England is deemed to have been granted subject to the condition (biodiversity gain condition) that development may not begin unless:
 - (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
 - (b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan, if one is required in respect of this permission would be Wiltshire Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. For further information on exempt developments please refer to: <https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>

Based on the information available this permission is considered to be one which will not require the approval of a biodiversity gain plan before development is begun because one or more of the statutory exemptions or transitional arrangements is considered to apply.

Parvis Khansari - Corporate Director, Place

NOTES

- 1 **Other Necessary Consents.** This document only conveys permission for the proposed development under Part III of the Town and Country Planning Act 1990 and the applicant must also comply with all the byelaws, regulations and statutory provisions in force in the area and secure such other approvals and permissions as may be necessary under other parts of the Town and Country Planning Act 1990 or other legislation.
 - 1.1 the need in appropriate cases to obtain approval under Building Regulations. **(The Building Regulations may be applicable to this proposal. Please contact the Council's Building Control team before considering work on site);**
 - 1.2 the need to obtain an appropriate order if the proposal involves the stopping up or diversion of a public right of way or other highway (including highway verge);
 - 1.3 the need to obtain a separate "Listed Building Consent" to the demolition, alteration or extension of any listed building of architectural or historic interest;
 - 1.4 the need to make any appropriate arrangements under the Highways Act 1980, in respect of any works within the limits of a highway. The address of the Highway Authority is County Hall, Trowbridge, BA14 8JD (It is the responsibility of the applicant to ascertain whether the proposed development affects any listed building or public right of way / other highway, including highway verge).
- 2 **Appeals.** If the applicant is aggrieved by the decision of the local planning authority to grant permission subject to conditions, he may appeal to the Secretary of State for the Environment in accordance with Section 78(1) of the Town and Country Planning Act 1990 within six months of the date of this decision. (Information and forms relating to the appeals process can be found at the Planning Portal - <http://www.planningportal.gov.uk/planning/appeals>).
- 3 **Climate Change.** Wiltshire Council acknowledges the climate emergency and is seeking to make the county carbon neutral. You are encouraged to include energy efficiency that exceeds building regulations and to meet residual energy demand through renewable energy and low-carbon technologies, including high levels of electric vehicle charging points. The developer is encouraged to contact the climate team to discuss this further. climate@wiltshire.gov.uk
- 4 **CIL.** The applicant is advised that the development hereby approved may represent chargeable development under the Community Infrastructure Levy Regulations 2010 (as amended) and Wiltshire Council's CIL Charging Schedule. A separate Community Infrastructure Levy Liability Notice will be issued by the Local Planning Authority. Should you require further information with regards to CIL please refer to the Council's Website [Community Infrastructure Levy \(CIL\) - Wiltshire Council](#)