



PLANNING DESIGN & ACCESS STATEMENT

Application:	Erection of livestock building, agricultural storage building and associated works – revised scheme to PL/2025/02802.
Property:	Lower Dunge Farm, Bratton Road, West Ashton.
Client:	TAC Page & Partners
Date:	November 2025
Agent:	Chris Cary MRICS FAAV Associate Partner - Rural Surveyor & Planner



1.0 INTRODUCTION

- 1.1 Woolley & Wallis have been instructed by TAC Page & Partners to submit an application for a new agricultural livestock building and associated storage building at Lower Dunge Farm, West Ashton. This application is to replace the existing consented scheme Ref: PL/2025/02802.
- 1.2 The purpose of this report is to identify and detail on planning considerations in respect to the application above.
- 1.3 Accompanying Documentation:
 - a) Proposed Location Plan
 - b) Proposed Block Plan
 - c) Proposed Livestock Building Elevations & Floorplan
 - d) Proposed Agricultural Storage Building Elevations & Floorplan
 - e) Whole Farm Plan
 - f) Details of Consented Scheme – Location Plan, Decision Notice
 - g) Farm Nutrient Calculations
 - h) Preliminary Landscape Assessment – WH Landscape.
 - i) Landscape & Visual Appraisal (to follow) – WH Landscape.
 - j) Ecology Survey & BNG Metric inc. Plan – Ethos Environmental.

2.0 BACKGROUND & RELEVANT PLANNING HISTORY

2.1

The applicants currently benefit from a consented scheme to erect a new livestock building & agricultural storage building upon the Lower Dunge Farm but rather than actioning the permission, they now seek permission to erect the livestock building & storage building in a different location upon the Farm. Here is why....

- 2.2 In early 2025, the applicants took the decision to take the land back in hand and farm it themselves. They are starting a livestock rearing enterprise and as such, require buildings to service it, with the only buildings upon the whole holding at the time being a small range of historic buildings at the main farmstead which are adjacent to the farmhouse. These buildings have been in equestrian use for many years now and approximately 5 acres of surrounding farmland has been occupied in conjunction with the use.
- 2.3 At the time, the most suitable site available was to the south of their holding, just off Capps Lane. A permitted development application was submitted for the two new buildings under Sch 2 Part 6 Class A of the General Permitted Development Order and was permitted – Ref PL/2025/02802.
- 2.4 This permission has yet to be actioned but provides a very real fallback option to the applicants.
- 2.5 However, since the grant of permission in April 2025, a block of land (with existing yard and building) which directly adjoined Lower Dunge Farm came available for sale. The applicants pursued this opportunity and were successful, completing on the purchase in October.
- 2.6 Upon reviewing the newly purchased land, it became clear that it offered a more suitable site for the development, we therefore now seek permission.
- 2.7 Due to the revised site being within 3km of Keevil Aerodrome, Permitted Development under Schedule 2, Part 6, Class A is not an option, thus we are now submitting a Full Application.

3.0 PROPOSED SITE INFORMATION

- 3.1 Having reviewed the proposed application site, the following have been noted and considered.
- 3.2 According to gov.uk flood risk map, the site does not lie with a River or Sea flood Risk Area nor within a Surface Water Flood Risk Area.
- 3.3 There are no Rights of Way crossing the proposed development site area. The closest Right of Way is public footpath WT/WASH/11 lies 287m away, towards the Southwestern boundary.
- 3.4 There are two listed buildings in the vicinity of the proposed site. Lower Dunge Farmhouse sits approximately 812m to the West and is within the applicant's ownership. The second listed building is Dunge Farmhouse, which sits approximately 944m to the West.

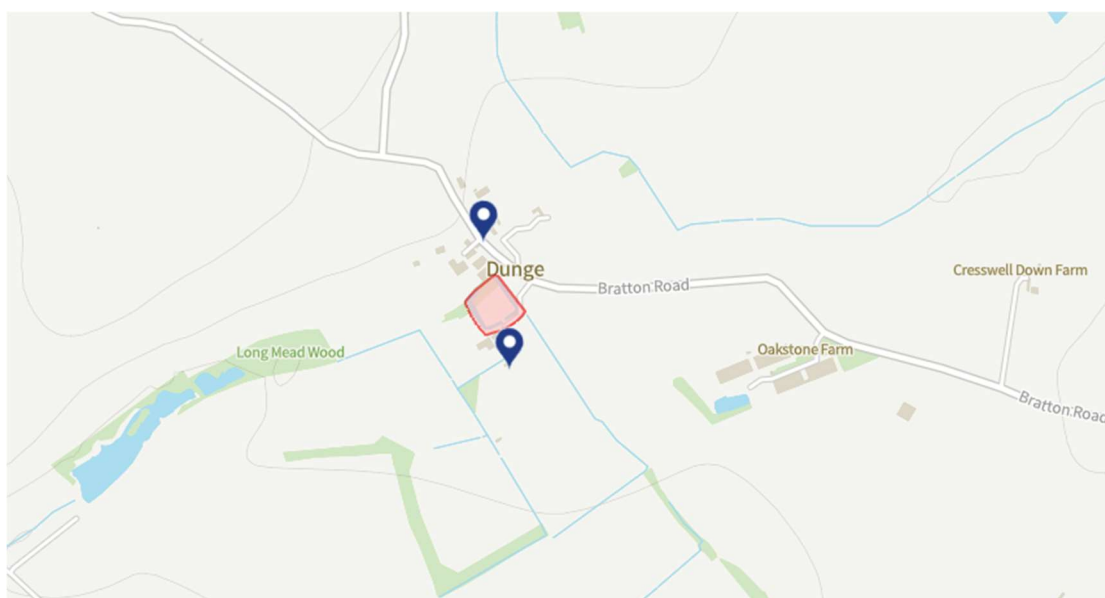


Image 1 – Listed Building Locations

- 3.5 WH Landscape have considered the landscape designations in the area.
- "There are no designated areas of nature conservation value within the site, and very few within the surrounding area although the site lies within the SSSI Impact Risk Zone (established to assess likely impacts on SSSIs/SACs/SPAs & Ramsar sites) for a number of SSSIs, including Picket and Clanger Woods SSSI, Steeple Ashton SSSI and Bratton Downs SSSI. Salisbury Plain, beyond the study area to the south, includes Special Protection Area (SPA) and Special Area of Conservation (SAC)".*
- 3.6 Ethos Environmental have considered local habitats and environmental designations in the area. A walkover survey of the land was undertaken which focused on present habitats and potential for protected species.
- The report notes that the whole development area is *"arable habitat exclusively"*. *"The site falls within the yellow zone within the Trowbridge and Westbury Mitigation Strategy (TWMS)".*

4.0 PROPOSAL

- 4.1 The below aerial plan shows the consented schemes location to the southwest of the holding, just off Capps Lane marked with a blue circle. The location of the proposed scheme is to the east upon the newly purchased land, marked in yellow.



Image 2 – Locations of consented & proposed development

Scale / Construction

- 4.2 The proposed development is not dissimilar to the previously consented scheme, as summarised below. It remains of a comparable scale and is constructed of near-identical external materials.
- 4.3 Significant consideration has been given to the design and layout of the revised scheme, including the siting and relationship of the buildings to one another. The arrangement ensures that all areas with the potential for dirty water generation are fully covered and contained within the built form, thereby improving operational efficiency and ensuring robust environmental management across the site.
- 4.4 The livestock building provides actual livestock housing area of 100' x 124', which is similar in scale to the previously consented building 110' x 97.8'. The overall building footprint has increased slightly to 151' x 124' to incorporate an additional covered cattle handling area within the same structure. This integrated design allows all cattle operations to take place under cover, removing the need for any external handling areas and enhancing animal welfare, operational efficiency, and environmental protection.
- 4.5 The proposed storage building will house a Farmyard Manure (FYM) store and three silage clamps to service the livestock enterprise. The FYM store will measure 100' x 40' (consented 120' x 45').
- 4.6 The storage building will accommodate a Farmyard Manure (FYM) store and three silage clamps to support the livestock enterprise. The FYM store will measure 100 feet by 40 feet (reduced from 120' x 45' under the consented scheme). The silage clamps will measure 100 feet by 96 feet, providing new facilities not yet permitted at the earlier site.

- 4.7 Both buildings will be of standard agricultural construction, being of steel portal frame construction. The design and construction of the muck store will comply with modern-day regulations.
- 4.8 The new building will be in keeping with the existing grain store onsite. The grain store will be used for machinery storage and storage of straights and blends.

Agricultural Justification

- 4.9 With regard to the proposed livestock enterprise, this will mirror the applicant's original plans, albeit relocated to a new and more suitable position within the farm.
- 4.10 The livestock rearing operation and associated buildings were fully assessed under the previously consented application, where it was accepted that the development is reasonably necessary for the purposes of agriculture.
- 4.11 In summary, the enterprise involves the purchase of young calves to be reared on the holding up to store or finished weight over approximately 20 months. The cattle will be fed on fodder produced within the holding, supplemented by concentrates as required.
- 4.12 Covered livestock housing is an essential animal welfare requirement, while the provision of covered manure stores and silage clamps aligns with the Farming Rules for Water (2018, as amended), which promote improved management of slurry and runoff to protect water quality.
- 4.13 The farming operations have recently been brought back in-hand, and as part of this process the applicants have reviewed their overall nutrient balance. Their agricultural adviser has utilised the PLANET Nutrient Management System to model nutrient outputs and ensure full compliance following development, based on a gradual increase in livestock numbers up to 150 head of cattle.
- 4.14 The results of the nutrient management assessment confirm that the enterprise comfortably complies with the Nitrate Vulnerable Zone (NVZ) Livestock Manure Nitrogen Farm Limit. At a herd size of 150 cattle, the predicted manure loading equates to approximately 4,950 kg N/year, well within the permitted farm limit of 22,950 kg N/year. We include the following documents 'Farmgate Nutrient Balance 150 Head' & 'Livestock Manure N Loading 150 Head'.

Drainage

- 4.15 All roof water will be captured by gutters to ensure that all clean water is kept clean. A number of water collection tanks will be installed to provide drinking water to the cattle.
- 4.16 A full surface water drainage strategy has been created by Aegaea and accompanies this application.
- 4.16 The livestock will be housed in a deep litter system preventing the creation of slurry.

5 PLANNING ASSESSMENT

- 5.1 The Planning and Compulsory Purchase Act 2004, Section 38(6) states that:

"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

- 5.2 At the current time the statutory development plan in respect of this application consists of the Wiltshire Core Strategy (WCS) (Adopted January 2015); the 'saved' policies of the North Wiltshire Local Plan (NWLP) 2011 (adopted June 2006) & the Wiltshire Housing Site Allocations Plan (WHSAP) (adopted February 2020). The WCS Strategy is relevant in this case.
- 5.3 Wiltshire Council are currently undertaking their Local Plan Review - Pre Submission Draft 2023- 2028 (Reg 18). Yet to be adopted therefore little weight given.
- 5.4 The National Planning Policy Framework (NPPF) 2024 as amended in Feb 2025 is the current national level policy document. This has been considered. At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 of the NPPF requires proposals that accord with the Development Plan to be approved without delay.

6 PRINCIPLE OF DEVELOPMENT

- 6.1 Core Policy 1 of the Wiltshire Core Strategy sets out the 'Settlement Strategy' for the county and identifies tiers of settlement – Principal Settlements, Market Towns, Local Service Centres, and Large and Small Villages. Only the Principal Settlements, Market Towns, Local Service Centres and Large Villages have defined limits of development/settlement boundaries.
- 6.2 Core Policy 2 of the Wiltshire Core Strategy sets out the 'Delivery Strategy'. It identifies the scale of growth appropriate within each settlement tier, stating that within the limits of development, as defined on the policies map, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages.
- 6.x Core Policy 29 provides the community area-based policy in this instance. This is silent on agricultural development.
- 6.4 The application site does not lie within any settlement and as such is located in the 'open countryside' for the purposes of the WCS. Residential development would need to rely on one of the exception policies as detailed within *Para 4.25 of Policy 2*. In case, 'Additional employment land' being CP34 & 'Supporting Rural Life' being CP48.
- 6.5 Agriculture is defined in Section 336 of the Town and Country Planning Act 1990 as:
- "agriculture" includes horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock (including any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land), the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds, and the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes, and "agricultural" shall be construed accordingly;*

- 6.6 The buildings are being erected for the purposes of housing cattle and associated storage. The development is considered to meet the above definition.
- 6.7 Core Policy 34 is the WCS's dedicated policy that deals with additional employment land. This policy states the following:

Outside the Principal Settlements, Market Towns and Local Service Centres, developments will be supported that:

- i. are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements; or
- ii. support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification; or
- iii. are for new and existing rural based businesses within or adjacent to Large and Small Villages; or
- iv. are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council.

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.

- 6.8 The development is in line with i. and complies with a. thought to e. above and is therefore compliant with CP34.
- 6.9 Even though CP48 does not specifically cover the erection of new agricultural buildings, it generally covers supporting rural life and looks to protect the countryside and maintain its local distinctiveness.
- 6.10 A strong material commencement of the application is the already consented scheme on farm. This is the applicant's fallback position.
- 6.11 Case law has confirmed that the existence of a realistic 'fallback position' is an extremely important material consideration that carries significant weight in the decision making process.
- 6.12 *"the council was entitled to accept that there was a 'real prospect' of the fallback development being implemented and to give the weight it evidently did that fall back as a material consideration"* (Mansell v Tonbridge).
- 6.13 The judgement of Mr Justice Hickinbottom (Zurich Assurance Ltd T/A Threadneedle Property Investments) (Claimant) v North Lincolnshire Council (Defendant) & Simons Developments Ltd (Interested Party) (2012) EWHC 3708 (Admin) is also relevant and In paragraph 75 Mr Justice Hickinbottom determined:

The prospect of the fall-back position does not have to be probable or even have a high chance of occurring; it has to be only, more than a merely theoretical prospect. Where the possibility of the fall-back position happening is "very slight indeed", or

merely "an outside chance", that is sufficient to make the position a material consideration....."

- 6.14 We fully appreciate that the consented scheme is permitted upon a different location upon the farm and that the new location will need to be assessed upon its own merits however where any betterment is presented, this should be given sufficient weight when determining this application.

7 IMPACT ON NEIGHBOURING AMENITY

- 7.1 The proposed development is located within an established agricultural setting and is positioned between existing farm buildings. The nearest neighbouring use is a poultry farm situated immediately to the north, which includes a non-protected farmhouse (AOC) associated with that enterprise.
- 7.2 There are no residential or other sensitive receptors in the immediate vicinity that would be affected by the proposed extended agricultural use. The new barns will not introduce any new sources of significant noise, light, or disturbance beyond the normal operation of a working farm. Lighting will be restricted to inside of the buildings and there will be no external lighting. The vehicular activity will remain consistent with existing agricultural operations on the site.
- 7.3 Accordingly, it is considered that the proposals will have no adverse impact on neighbouring amenity, and the development is fully compliant with Core Policy 57 of the Wiltshire Core Strategy, which seeks to ensure that new development does not result in harm to the amenities of existing occupants or neighbouring uses. The proposal also aligns with the National Planning Policy Framework (NPPF) requirement to secure a high standard of amenity for all existing and future users.

8 IMPACT ON HIGHWAYS

- 8.1 The existing farmyard is serviced by an existing modern agricultural access onto the Bratton Road, a council maintained highway. The access is laid to a consolidated surface, specifically concrete, the gates are recessed and has a splayed entrance providing good visibility in both directions.
- 8.2 The proposed development will present a minor intensification of existing traffic movements at the yard. The existing yard provides more than sufficient room for turning and manoeuvring as well as sufficient parking.
- 8.3 No changes are proposed to the existing access.
- 8.4 The consented scheme which this proposal replaces, was to be served by a sub-standard field gate. In such this proposal presents a level of betterment.
- 8.5 It is considered that the proposed development would not result in any unacceptable impact on highway safety to justify a refusal on highway grounds (Para 116 NPPF). On the contrary, it represents an improvement over the previously approved arrangement, offering a safer and more suitable access.

9 IMPACT ON ECOLOGY

- 9.1 The development site comprises intensively farmed arable land that holds limited ecological value. The proposed works are located more than 15 metres from the nearest hedgerow and as such is compliant with the TWMS.
- 9.2 Ethos Environmental Planning has completed the required Biodiversity Net Gain (BNG) metric. To ensure compliance, the proposals include the planting of **72 new trees and some hedgerow management** creating over a 10% net gain. Consequently, no bat surveys are required.

10 IMPACT ON LANDSCAPE

- 10.1 WH Landscape Consultancy (Mr Robin Lines) were instructed to undertake a Landscape & Visual Appraisal (LVA) which shall be submitted once fully drafted. In the interim a Preliminary Landscape Statement has been drafted and accompanies the application.
- 10.2 The assessment found that the site lies on former arable land adjacent to existing agricultural buildings and close to an established poultry farm. The proposals will consolidate the existing built form within a low-lying and visually contained landscape.
- 10.3 Due to existing hedgerows, flat topography, and limited public viewpoints, visual effects are considered minor and acceptable. The development will not affect any designated heritage assets or protected landscapes and is therefore compliant with Core Policy 51 of the Wiltshire Core Strategy and Section 15 of the NPPF, conserving the character and appearance of the local landscape.

11 CONCLUSION

- 11.1 The proposed development seeks permission for the erection of a livestock building and associated storage building on land at Lower Dunge Farm, replacing the previously consented scheme at Capps Lane. The revised location offers a more practical and sustainable position within the holding, adjoining existing agricultural infrastructure and making efficient use of the recently acquired land.
- 11.2 The proposal remains of comparable scale and appearance to the approved scheme, constructed using near-identical materials and methods. The design incorporates covered handling and storage areas, ensuring that all potential dirty water sources are contained within the buildings. This represents a clear environmental and operational improvement, fully compliant with the Farming Rules for Water and modern agricultural best practice.
- 11.3 Comprehensive supporting assessments confirm that the development will not give rise to any unacceptable impacts upon landscape, ecology, neighbouring amenity, or highway safety. The site has been found to hold limited ecological value, achieves a Biodiversity Net Gain of over 10%, and benefits from a high level of natural screening within the wider landscape.
- 11.4 The proposal accords with the Wiltshire Core Strategy, in particular Core Policies 34, 51, 57, and the aims of the National Planning Policy Framework (2024, as amended 2025),

which together support sustainable rural development and the continued viability of agricultural enterprises.

- 11.5 In summary, the development represents a well-designed, environmentally responsible, and policy compliant agricultural proposal that will support the long-term sustainability of Lower Dunge Farm and the wider rural economy.

Appendix 1 – Already consented scheme (PL/2025/02802)



14 April 2025

TOWN & COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 2015

DETERMINATION AS TO WHETHER PRIOR APPROVAL IS REQUIRED FOR AGRICULTURAL BUILDINGS AND/OR OPERATIONS (SCHEDULE 2, PART 6)

PL/2025/02802

Lower Dunge Farm, Bratton Road, West Ashton, Trowbridge, BA14 6AX

I refer to your application for a determination as to whether prior approval is required for Erection of livestock shed and agricultural storage barn at the above address, received as valid on 20 March 2025

I am writing to confirm that prior approval **will not be required** for this development.

This decision is valid for five years from the date your application was registered and you should note that if you proceed with the development it should be carried out by that date and only in accordance with the submitted details.

You should also note that under the terms of the Town and Country Planning (General Permitted Development) Order 1995 you are required to notify this Authority in writing and within seven days, of the date on which the development is substantially completed. Furthermore, if the use of the building for the purposes of agriculture within the unit permanently ceases within ten years from the date on which the development was substantially completed, and planning permission has not been granted for purposes other than agriculture within three years from the date on which the use within the unit permanently ceased, then the building shall be removed from the land and the land shall, as far as is practicable, be restored to its previous condition.

Signed

Parvis Khansari - Corporate Director, Place