

APPLICATION FOR FULL-PLANNING PERMISSION

DELEGATED REPORT

APPLICATION REFERENCE:	PL/2025/09199
APPLICATION TYPE:	Full planning permission
SITE ADDRESS:	Upper Combe Farm, Upper Castle Combe, Chippenham, SN14 7HE
DEVELOPMENT DESCRIPTION:	The erection of an agricultural building to provide grain storage and drying (retrospective).
RECOMMENDATION:	Approve with Conditions

PROPOSAL

The application is for the retrospective erection of an agricultural building at Upper Combe Farm, north of Upper Castle Combe. The building is to provide grain storage and drying.

The majority of the established farm business is for dairy and beef, but approximately 40 ha of specialist wheat is grown each year.

It is understood from the planning application supporting planning statement, that due to the specialist nature of the wheat crop and the high value the harvested grain commands, a dedicated store at Upper Combe Farm was required to consolidate the temporary storage and ensure optimal drying and storage conditions are achieved.

APPLICATION SITE

The development is located adjoining to an existing farm complex, and immediately adjacent to another large agricultural building.

The application site is situated within the Cotswold National Landscape. The application site is within the consultation zone for the Bath and Bradford on Avon SAC Core Roost. The location of the building is outside of the Castle Combe Conservation Area, but the access and some of the farmstead is located within the Conservation Area. Upper Combe Farmhouse is Grade II listed and situated approximately 71m from the proposed building, with intervening buildings.

PLANNING HISTORY

Proposal / Summary
N/09/00648/AGN - Agricultural & Forestry - Detailed matters Decision - Permitted Development Date: 12/5/2009 – Open Grass Silo
14/07567/FUL - Full planning permission Decision - Approve with Conditions Date: 3/10/2014 – Construction of Silage Clamp

More planning history available on the wider site, but not directly relevant to this application.

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

National Planning Policy:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide

Development Plan:

The development plan for Wiltshire comprises the *Wiltshire Core Strategy (WCS)* (adopted January 2015) and any made neighbourhood plans, which remains the principal statutory planning document guiding development across the county. In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

The adopted Wiltshire Core Strategy (WCS), with particular regard to:

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 10 Chippenham Spatial Strategy
- Core Policy 34 Additional Employment Land
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 51 Landscape
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58 Ensuring the Conservation of the Historic Environment;

ISSUES

The main issues that need to be addressed in this case include:

- Whether the development is acceptable in principle (CP 1 and 2)
- Whether the scheme constitutes high quality design (CP 57)
- Whether the scheme would have an acceptable impact upon the reasonable living conditions of the adjoining occupants (CP 57)
- Whether the scheme would preserve or enhance the historic environment (CP 58)
- Whether the scheme would have an acceptable landscape impact (CP 51)
- Whether there would be any harmful impacts upon protected species or priority habitats (CP 50)

CONSULTATION RESPONSES

Castle Combe Parish Council: Support.

Council Highway Engineer: No objection.

Council Public Protection team: No objection.

Council Ecologist: No objection subject to conditions:

Bath and Bradford on Avon Bat Special Area of Conservation (SAC): Habitat Regulations Assessment (HRA)

The application site is located within a consultation zone for Lesser Horseshoe bats associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and therefore has potential to result in significant adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

The retrospective development is on existing hardstanding, no vegetation removal was undertaken as part of the development and no additional external lighting has been proposed.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This concluded that given the scale and nature of the development there is no mechanism for adverse effect/any temporary construction impacts and operational impacts would be de-minimus. The Habitat Regulation Assessment (HRA) has concluded that the application will not result in any mechanism for adverse effect on Annex II bats, or on the conservation objectives of the SAC and subsequently is screened out of Appropriate Assessment.

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

Biodiversity Net Gain

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as the planning application relates to development to which section 73A of the Town and Country Planning Act 1990 (planning permission for development already carried out) applies.

Note to case officer: you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 187 d). The inclusion of a nesting bird box as shown in Insert 3: Proposed Biodiversity Enhancement (Planning, Design and Access Statement. November 2025. North Letherby. Ref. P138-1) is welcomed.

CONDITIONS:

The development will be carried out in strict accordance with the following documents:

- *Planning, Design and Access Statement. November 2025. North Letherby. Ref. P138-1.*

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

REPRESENTATIONS

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of:

- Neighbour notification letters sent to adjoining and nearby properties;
- A site notice displayed near the site

These methods were used to inform interested parties and provide a period of 21 days for comments to be submitted.

No representations have been received.

ASSESSMENT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purposes 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."

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any made Neighbourhood Plans. Consideration has also been given to the

policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

Principle of development

The application site forms part of an established working farm. The proposed (retrospective) building is for an agricultural building to provide grain storage and drying, and directly supports the farm's continued operation and modern functioning. The business has diversified to grow approximately 40 hectares (around 100 acres) of specialist wheat annually, but recently lost access to its rented grain store and has since been reliant on temporary storage solutions. Given the specialist nature and high value of the crop, a dedicated on-site facility was required to ensure appropriate drying and storage conditions. Core Policy 34 of the Wiltshire Core Strategy supports development where it facilitates sustainable farming practices and diversification. The proposal directly supports the continued operation and modern functioning of the farm. As such, the development is considered to comply with the aims of Core Policy 34 and is acceptable in principle.

Design and Impact on the Character and Appearance of the Area (Cotswold National Landscape)

Core Policy 57 of the WCS requires high-quality design that:

- Enhances local character.
- Responds to the natural, historic, and built environment.
- Retains important features (e.g., trees, hedges).
- Supports sustainable construction and compatibility with surrounding uses.
- Creates safe, legible, and accessible spaces.

Section 12 of the NPPF emphasises design that is:

- Visually attractive.
- Functionally effective.
- Contributes to the quality of the built environment.

The Wiltshire Design Guide encourages sensitivity to local character, materials, and architectural styles and supports modern living standards while maintaining aesthetic and functional quality.

Assessment

The building comprises a steel portal-framed structure measuring approximately 18.3m in length and 8.8m in width, with a footprint of around 161sqm. The building measures 5.5m to the eaves and 6.7m at the ridge. The construction includes a concrete floor and concrete wall panels to a height of approximately 3m, with Olive Green box-profile steel cladding above on the northern, eastern, and southern elevations. A roller shutter door provides access on the western elevation, and the roof is finished in dark grey fibre cement sheeting. The building is fully enclosed to protect the crop from weather and vermin. Its simple form and agricultural appearance are typical of modern farm structures and appropriate to its functional role.

The building sits on the edge of an established farm complex and has been sited on an area of existing hardstanding. It is not visually prominent in the wider landscape, and would be read within the context of existing farmstead buildings. The size of the building is appropriate in the context of adjoining buildings. The structure reads as part of the existing farmstead and does not result in any harmful landscape or visual impact. There would be no harm to the wider landscape or Cotswold Natural Landscape as a result.

Conclusion

The design and siting are considered to accord with the requirements of Core Policies 51 and 57, which seek to protect landscape character and ensure development is visually appropriate to its setting. As such, the development is considered acceptable in principle and in visual and landscape terms.

Heritage

From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990.

Section 66 (Planning Permission) requires that special regard be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Act requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas. The NPPF outlines government policy for planning. Chapter 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that designated and non-designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance and encourages proposals which improve the condition of heritage assets at risk.

The application building lies outside the Castle Combe Conservation Area; however, the farm access and part of the wider farmstead fall within the Conservation Area. Upper Combe Farmhouse is a Grade II listed building located approximately 71m to the south-east of the new agricultural building, with some existing farm structures positioned between them.

The proposed building is situated on established hardstanding on the edge of an working farmstead. It adopts a typical modern agricultural form, using appropriate materials and scale for its functional purpose. Given its location on the farmstead and appropriate size and design, the development does not cause any harm to the setting or character or appearance of the Conservation Area or listed farmhouse.

The new structure reads as part of the existing farmstead and does not introduce any incongruous feature that would diminish the significance or setting of nearby heritage assets

or be out of character with the locality. Consequently, the proposal results in no harm to the setting of Upper Combe Farmhouse or to the character or appearance of the Castle Combe Conservation Area.

Conclusion

The development is considered acceptable with regard to heritage matters and complies with Core Policy 58 of the Wiltshire Core Strategy, which seeks to ensure the conservation and enhancement of the historic environment as well as relevant paragraphs to the NPPF.

Amenity

Policy Context

Core Policy 57 (Point vii) of the Wiltshire Core Strategy requires development to respect the amenity of existing occupants and ensure appropriate amenity levels for future residents.

The National Planning Policy Framework (NPPF), particularly Paragraph 135, reinforces the need for development to provide a high standard of amenity for both existing and future users.

The proposed building is for agricultural grain storage and is of an appropriate and proportional scale within the context of the established farmstead. It is positioned on the northern side of the complex and adjoins existing agricultural buildings.

Whilst there are residential units within the wider farmstead, these are already experienced within an active agricultural setting, and several intervening buildings lie between them and the new structure. The nature of the grain storage use, combined with the building's siting, means it will not generate adverse effects in terms of noise, disturbance, or activity beyond what is typical for a functioning farm.

Given the separation distances and screening provided by existing structures, the proposal would not result in overlooking, loss of privacy, overshadowing, overbearing impact, or other amenity concerns for nearby dwellings. The development is therefore considered acceptable in terms of residential amenity and complies with Core Policy 57 of the Wiltshire Core Strategy.

Highways and parking

Transport implications are a key factor in assessing planning applications, especially for larger developments. Proposals must demonstrate:

- Safe and suitable access for all users, including pedestrians, cyclists, and those with mobility impairments.
- No severe residual impacts on the surrounding highway network.
- Promotion of sustainable travel, reducing reliance on private vehicles.
- Adequate parking and cycle provision, in line with adopted standards.
- Protection and enhancement of public rights of way and active travel routes.

Relevant policies include Core Policies 60–64 of the Wiltshire Core Strategy, supported by the Wiltshire Local Transport Plan, Car Parking Strategy, and Cycling Strategy. The Local Cycling and Walking Infrastructure Plan (LCWIP) and LTN 1/20 (DfT) provide further design guidance for active travel infrastructure.

There are no proposed changes to the access or parking arrangements. The existing private access will be utilised in association with the new grain storage building. There would be no impact on the highway network as a result of the proposal. The Council's Highway Engineer has no objection to the proposals. There is not considered to be any harm to highway safety or parking.

Ecology and Biodiversity

The ecological impact of development is a key planning consideration, especially for larger schemes. Proposals must assess and address potential effects on:

- Protected species
- Priority habitats
- Ecological networks
- Green and blue infrastructure

Core Policy 50 of the Wiltshire Core Strategy requires development to:

- Avoid harm to ecological assets.
- Deliver measurable Biodiversity Net Gain (BNG), in line with the Environment Act 2021.
- Support habitat restoration and connectivity.
- Integrate biodiversity into site design.

Unless exempt, National policy requires a minimum of 10% Biodiversity Net Gain (BNG) for major developments, demonstrated via:

- Biodiversity Metric calculations
- Ecological assessments (e.g. PEAs, Phase 1 surveys, protected species surveys)

Assessment

The site lies within the consultation zone for the Bath and Bradford on Avon Bats SAC, requiring consideration under the Habitats Regulations. The development is retrospective and located on existing hardstanding, with no vegetation removal and no new external lighting proposed. A Test of Likely Significant Effects has been undertaken by the Local Planning Authority, which concludes that the scale and nature of the development provides no mechanism for adverse effects on Annex II bats, or on the conservation objectives of the SAC and subsequently is screened out of Appropriate Assessment.

The wider farmstead provides habitat suitable for foraging, commuting and roosting bats. Whilst no additional lighting is proposed, any future lighting should be restricted to that

necessary for safe access and security, and should comply with ILP Guidance GN01:2021 and GN08/23 to avoid harm to bats.

Biodiversity Net Gain became mandatory on 12 February 2024; however, as this is a retrospective application under Section 73A, mandatory BNG requirements do not apply.

Core Policy 50 requires development to avoid net loss of biodiversity and seek opportunities for enhancement. The inclusion of a nesting bird box, as set out in the submitted Planning, Design and Access Statement, is welcomed. Subject to the development being carried out in accordance with the submitted ecological information, the proposal is considered acceptable in ecological terms.

CONCLUSION

The principle of development is considered acceptable when assessed against the settlement strategy of the Wiltshire Core Strategy.

The proposed building comprises an appropriately designed agricultural building on the edge of an existing farmstead. There would be no harm in design terms, impact on the wider landscape or Cotswold National Landscape, and no harm to the setting of nearby heritage assets (Conservation Area and nearby listed farmhouse). The proposal is acceptable in highway, ecology and residential amenity terms. The proposal would support the existing farm enterprise. No material planning harms have been identified. Accordingly, the proposal is considered acceptable in planning terms and is recommended for approval, in accordance with the Wiltshire Core Strategy, the National Planning Policy Framework, and all other relevant material considerations.

RECOMMENDATION: That Planning Permission be GRANTED, subject to conditions:

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

Location Plan

Site Plan Dwg No B Rev 2

Ground Floor Plan Dwg No 1 Rev 1

Elevations Dwg No 2 Rev 1

Elevations Dwg No 3 Rev 1

Roof Plan Dwg No 4 Rev 1

Planning, Design and Access Statement. Ref. P138-1 November 2025

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

Informative:

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.