



Erection of a Permanent Rural Worker's Dwelling

Agricultural Supporting Statement

Property: Mill Farm, Hill Deverill, Warminster
Client: Oliver Hurd
Report Date: 11 February 2026
Woolley & Wallis Reference: [Click or tap here to enter text.](#)



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1.0 INTRODUCTION

- 1.1** Woolley & Wallis are instructed by Oliver Hurd to prepare an agricultural supporting statement for the erection of a permanent dwelling for a Rural Worker to support the operations of an existing dairy enterprise at Mill Farm, Hill Deverill.
- 1.2** Woolley & Wallis have visited the farm on numerous occasions most recently on 10 December 2025.
- 1.3** Reviewed past planning history.
- 1.4** Discussed the farm business with Paul Hurd and Oliver Hurd and had sight of the last three years' worth of accounts (available to the Council on a confidential basis).
- 1.5** The report has been prepared by Ben Marshall a Partner of Woolley & Wallis, a Rural Practise Member of the Royal Institute of Chartered Surveyor and a Member of the Central Association of Agricultural Valuers (former local association chairman) holding a Master's Degree from the Royal Agricultural University.

2.0 RELEVANT PLANNING HISTORY

- 2.1** Mill Farm has been owned and run by several generations of the Hurd family and has existed as a dairy farm for over fifty years.
- 2.2** The farm buildings have grown and been adapted to keep pace with modern dairy farm practises.
- 2.3** In 2020 planning permission was obtained for a temporary agricultural worker dwelling 19/11763/FUL for Oliver to live in with his partner and children.

3.0 BACKGROUND

- 3.1** The farm business is owned by Paul Hurd, Father of the applicant who is an employee.
- 3.2** The farmed area extends to approximately 162 ha (400 acres). The land comprises 56 acres including the farm buildings which is freehold owned by William Hurd (grandfather of Oliver) who is deceased with his estate in probate. It is anticipated that the farm will be willed to Oliver Hurd with Paul Hurd being gifted a life interest.
- 3.3** Currently Paul holds the land on a Farm Business Tenancy (FBT). The FBT original term was for 22 years. The tenancy has now converted to a tenancy from year to year. In addition to the FBT land, Paul Hurd also takes some 350 acres in the locality on annual tenancies. Most of the arrangements for the 350 acres have existed for more than 20 years.
- 3.4** The farm is run as a livestock unit with dairy and beef enterprises. The dairy herd is based at the farm buildings and comprises 100 dairy cows. The cows are primarily Holstein Friesian, with some Fleckveih cross coming through. Milk is sold to ARLA under a bulk contract. The cows are calved at or close to the farm buildings throughout the year. All milk production is from grass and silage. Replacement dairy cows are home bred with some 20 heifers admitted to the herd annually.
- 3.5** All calves are retained on the unit with the majority reared as beef cattle. The beef animals are finished at approximately 24 months and sold at Frome Market.
- 3.6** All day-to-day husbandry is shared by the applicant and his father Paul Hurd who is approaching retirement.

- 3.7** Paul Hurd owns and resides at Mill Farmhouse. It is anticipated that he will continue to live at Mill Farmhouse after retirement.
- 3.8** Oliver used to live at Upton Scudamore six miles from the farm. In 2020 planning consent was approved for a temporary dwelling to be located on Mill Farm opposite the farm buildings to enable Oliver to assist his father, with veterinary and husbandry of the cows. The farmyard is open to the B3095 and the existence of the temporary dwelling has improved security.

4.0 PROPOSAL

- 4.1** The applicant proposes the erection of a dwelling for permanent occupancy by a rural worker.
- 4.2** The dwelling will be occupied by the applicant Oliver with his partner and two children. Oliver is employed full time in the agricultural business.
- 4.3** The rural worker's dwelling will be sited in the same position as the current temporary rural worker's dwelling located opposite the farm buildings.

5.0 NATIONAL PLANNING POLICY

- 5.1** National planning policy guidance for development in the countryside is set out in the National Planning Policy Framework (NPPF) updated in December 2023.
- 5.2** Paragraph 11 of the NPPF sets out the core land-use planning principles that should be adopted and these expressly include:
- A presumption in favour of sustainable development.
 - Positively seek opportunities to meet the development needs of the area and be sufficiently flexible to adapt to rapid change.
 - Provide for objectively assessed needs for housing and other uses.
 - Approving development proposals that accord with an up-to-date development plan without delay; and
 - Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission.
- 5.3** Paragraph 38 requires that decision makers;
- Should approach decisions on proposed development in a positive and creative way.
 - Work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.
 - Seek to approve applications for sustainable development where possible.
- 5.4** Section 5 of the NPPF is concerned with 'Delivering a sufficient supply of homes' and at paragraph 84 it notes:
- "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply.

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.

5.5 Section 6 of the NPPF is concerned with 'Building a strong, competitive economy' and at paragraph 85 it notes:

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt..."

5.6 At paragraph 88 'Supporting a prosperous rural economy' it notes:

"Planning policies and decisions should enable":

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

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

5.7 New Planning Practice Guidance titled 'Housing Needs of Different Groups' (July 2019) provides some guidance relevant to paragraph 84 of the NPPF in the section 'How can the need for isolated homes in the countryside for essential rural workers be assessed'?

These include:

- "Evidence of the necessity for a rural worker to live at or in close proximity to their place of work to ensure the effective operation of agricultural, forestry or similar land-based rural enterprise (for instance where farm animals or agricultural processes require on-site attendance 24 hours a day and where otherwise there would be a risk to human or animal health or from crime, or to deal quickly with emergencies that could cause serious loss of crops or products);
- The degree to which there is confidence that the enterprise will remain viable for the foreseeable future;
- Whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process;
- Whether the need could be met through improvements to existing accommodation on the site; providing such improvements are appropriate taking into account their scale, appearance and the local context; and
- In the case of new enterprises whether it is appropriate to consider granting permission for a temporary dwelling for a trial period."
- It further notes that: "Employment on an assembly or food packing line, or the need to accommodate seasonal workers, will generally not be sufficient to justify building isolated rural dwellings"

5.8 At paragraph 182 it states:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."

6.0 LOCAL PLANNING POLICY

- 6.1** Policy CP1 Settlement Strategy of the Wiltshire Core Strategy (Adopted January 2015) is concerned with the location of development and notes that development in the countryside will be strictly controlled. It states that development outside defined settlement boundaries will only be permitted where it is consistent with other policies of the plan and where it supports the rural economy or meets specific countryside exceptions.
- 6.2** Policy CP48 Supporting Rural Life is concerned with development in the countryside and notes that proposals will be supported where they “help to maintain the vitality of rural communities, support sustainable rural businesses and respect the character of the countryside.”
- 6.3** In CP48 Paragraph 6.67 it states that;
- “Additional dwellings may be justified in certain circumstances when they are required in the interests of supporting rural employment, for example in association with equestrian activities when worker accommodation is needed onsite. In view of the exceptional circumstances, applications will be scrutinised thoroughly and opportunities for accommodation within nearby settlements must be considered initially”
- 6.4** Policy CP44 Rural Exception Sites is concerned with housing outside settlement boundaries and notes that:
- “Housing development will not normally be permitted in the countryside. However, affordable housing to meet the local needs of settlements may be permitted as an exception, where it is small-scale, meets local needs and remains affordable in perpetuity.”
- 6.5** With regard to agricultural and rural workers’ dwellings, the Wiltshire Core Strategy and supporting text make clear that new dwellings in the countryside may be permitted where there is a proven essential functional need for a worker to live at or very close to their place of work. Applications must demonstrate that:
- The rural enterprise is established and financially viable.
 - There is genuine and essential need for on-site presence.
 - The need cannot be met by existing accommodation in the area.
 - The proposed dwelling is appropriately sited and of a scale and design that respects the character of the countryside.

7.0 APPRAISAL

- 7.1** An assessment of essential need should consider:
- The level of risk involved.
 - The likelihood, frequency and nature of out of hours emergencies;
 - The scale of potential losses if such emergencies occur;
 - How easily problems can be identified.
 - Whether a worker can respond and resolve issues promptly.

- 7.2** Under the Animal Welfare Act 2006, it is a criminal offence to cause unnecessary suffering to any animal. The Act also places a Duty of Care on those responsible for animals, requiring them to take reasonable steps to ensure their welfare needs are properly met. At Mill Farm, overall responsibility for the welfare of all livestock rests with the applicant, Oliver.
- 7.3** In relation to the application site, the essential need stems from:
- The care and welfare of all livestock on the farm;
 - The close monitoring of cows during the calving period, with the ability to provide immediate;
 - Assistance in difficult births to protect the welfare of both cow and calf;
 - The routine care and supervision of young calves born and reared on the farm, including ensuring they are able to drink milk substitute and, where necessary, providing hands-on assistance to train them to use a milk dispenser;
 - The routine monitoring of housed livestock to identify any signs of illness, injury or distress, with the ability to take prompt and appropriate action to address any issues that arise;
 - The provision of on-site oversight to safeguard livestock from theft, vandalism, or malicious harm;
 - Responding promptly and effectively to any unforeseen emergencies that may arise.
- 7.4** Unforeseen circumstances can arise on livestock farms, including animals straying, theft (rustling), or unauthorised access by intruders, all of which can compromise livestock health and result in significant economic loss. Adverse weather conditions, such as thunder and lightning, may also cause animals to panic or stampede, increasing the risk of injury. Furthermore, a fire within a livestock building would require immediate intervention. The presence of an on-site agricultural worker significantly reduces these risks and helps to ensure that livestock welfare and farm management standards are maintained at all times.
- 7.5** The first three months of a calf's life are widely recognised within current industry guidance as being critical to its long-term health, growth, and productivity. Contemporary best practice guidance from bodies such as Defra and Red Tractor Assurance emphasises that calf mortality and diseases are most associated with hygiene, ventilation, colostrum management, and temperature control within livestock housing. Conditions such as scour and pneumonia remain key risks during this early stage, reinforcing the need for close daily supervision and prompt intervention to safeguard welfare and future performance.
- 7.6** The rearing of batches of purchased calves is highly specialised and labour-intensive process as young animals are particularly vulnerable to health issues such as pneumonia and scour, requiring close daily supervision and rapid intervention.
- 7.7** The day-to-day management of the business is carried out by the applicant, Oliver Hurd and Paul Hurd.

- 7.8** Using the Agricultural Budgeting and Costings Book (ABC) November 2024, and a standard man day (SMD) being 8 hours over 275 days a year, the current labour requirements for the livestock business for livestock on site each year are set out as follows:

	SMD/ANIMAL	SIZE	TOTAL SMD
Dairy Cow	4.38	100	438
Calve 0-12 months	1.63	100	163
Finished Beef 12-24 months	1.75	100	175
Total			776
No. of workers at 275 SMD/Worker			2.82

- It is evident that the applicants' existing livestock enterprise generates a full-time labour requirement. The provision of a permanent agricultural worker's dwelling on site would address the identified essential need, support a high standard of husbandry and management, minimise potential losses, and ensure that animal welfare is properly safeguarded.

8.0 SECURITY AND VALUE OF STOCK

- 8.1** Security considerations remain a significant concern and add further weight to the case for a continued on-site presence, particularly given that the farm is located adjacent to a public road, increasing its visibility and accessibility. Theft and attempted theft of livestock can clearly compromise animal welfare and safety and cannot be dismissed as immaterial. It is widely acknowledged by insurers, including NFU Mutual, and by the Police that rural crime -particularly the theft of livestock and machinery has increased in recent years. Were the rural worker to reside off site, the risk of unauthorised access and criminal activity would be materially greater. An established on-site presence acts as a strong deterrent and significantly reduces that risk.

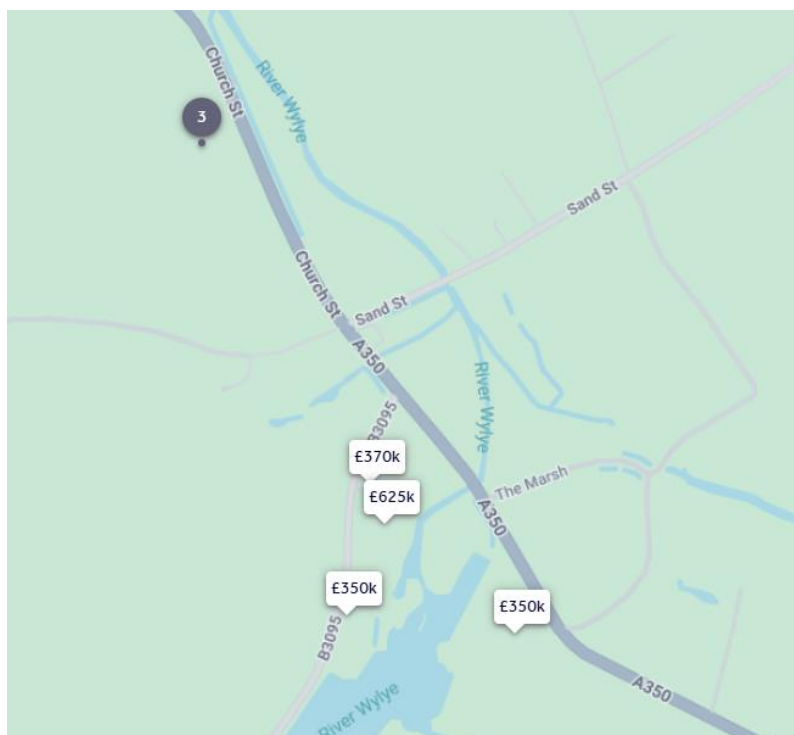
9.0 SUSTAINABILITY

- 9.1** The National Planning Policy Framework (NPPF) places an overarching emphasis on achieving sustainable development in accordance with the development plan. This approach is reinforced in respect of supporting a prosperous rural economy (paragraph 88). Of particular relevance when considering proposals for rural worker accommodation is the economic dimension of sustainability. Although national policy no longer sets out detailed tests in the way previous guidance did, the financial soundness and long-term viability of the enterprise remain central to the assessment. In this regard, Core Policy 48 of the Wiltshire Core Strategy requires that any essential rural worker's dwelling is justified by a functional need and that the enterprise concerned is established, viable and capable of being sustained in the long term.
- 9.2** In this context, Woolley & Wallis considers economic sustainability to mean the capacity of the enterprise to operate efficiently and make effective use of its resources; to remain trading in the longer term; to maintain adequate cash flow to meet its ongoing commitments; and to generate sufficient profit to allow reinvestment and provide a reasonable return on capital. An enterprise cannot be regarded as viable where, over the medium to long term, its costs consistently exceed its income. Together, these factors are fundamental to robust and responsible business planning.
- 9.3** It is widely recognised that the accepted test for an agricultural worker's dwelling is whether the enterprise can generate sufficient surplus to reward land, labour and capital, and to support the cost of providing the proposed accommodation
- 9.4** Business Accounts can be made available under a separate confidential agreement for the financial years ending 31 March 2022, 31 March 2023, 31 March 2024 and 31 March 2025.

- 9.5 The costs of sales include purchases – Feed, Fertilizer etc and cattle. It also includes Contract hire and wrap.
- 9.6 The Business over the last four years has made a profit on three occasions, averaging over those years above £19,000. The year in which a profit wasn't made it should be noted the purchase of new cattle was made which was not in the other three years.
- 9.7 Analysis of the Balance Sheet demonstrates that Total Assets less Current Liabilities provide a sufficient financial cushion to withstand market fluctuations, as is typical of many rural enterprises.
- 9.8 The construction of the rural worker's dwelling will be financed by the agricultural business.
- 9.9 Overall, it is considered that the agricultural business has been established for over 40 years and has operated from the holding throughout that period. Within the past four financial years, the enterprise has generated a profit in three, demonstrating consistent trading performance. The business is well-established, financially sound, viable and sustainable, with strong prospects of remaining so in the future. The proposal is therefore compliant with the National Planning Policy Framework and the relevant Local Plan Policy.

10.0 OTHER DWELLINGS

- 10.1 The applicants have been living on site full-time since 2020 in the temporary dwelling permitted under 19/11763/FUL.
- 10.2 There are no other dwellings on the holding and Woolley and Wallis is not aware of any other dwelling that is suitable and available and sufficiently close to the application site to meet the identified functional and essential needs and ensure that the management and welfare needs of the applicants' livestock on site are not compromised.
- 10.3 A search of Rightmove on 13 February 2026 displays 7 properties for sale within 1 mile of the application site postcode as shown below:



- 10.4** Out of the 7 Properties discovered during the Rightmove search 3 are apartments for over 55, one has a guide price of £625,000 which Woolley and Wallis considered very much beyond the financial affordability of a rural worker. The Property located next to the A350 is over 500 meters away from the farm which Woolley and Wallis considered beyond the sight and sound of the housed livestock. Although the last two properties are within 200m they are still beyond the financial affordability of a rural farm worker and are not large enough to accommodate a family of four.

11.0 SUMMARY

- 11.1** Oliver Hurd, the applicant, seeks planning permission for the erection of a permanent rural worker's dwelling to support the continued operation and development of their established agricultural enterprise at the application site and to meet the accepted management and welfare requirements of livestock kept on the holding.
- 11.2** An on-site presence will enable the applicants to ensure that the specialised management and welfare needs of the livestock enterprise are not compromised, particularly in relation to out-of-hours supervision and emergency response.
- 11.3** Woolley & Wallis has assessed the need for a rural worker's dwelling on the unit and concludes that there is an essential need for at least one full-time worker to be readily available at the holding. The enterprise generates approximately 776 SMD, equating to a requirement for 2.82 full-time equivalent workers (based on 275 SMD per worker), clearly demonstrating a substantive labour demand. The scale and nature of the livestock enterprise require a worker to be on hand to deal promptly with emergencies which could otherwise result in serious livestock loss or compromise animal welfare.
- 11.4** In terms of sustainability, the business has been established on the holding for over 40 years and, within the past four financial years, has returned a profit in three. The Financial Statements demonstrate that the enterprise is financially sound, viable and capable of supporting labour costs, providing a return on capital invested and funding the construction of the proposed dwelling.
- 11.5** With regard to alternative accommodation, there are no other dwellings on the holding capable of meeting the identified need. It is confirmed that Paul Hurd resides at Mill Farmhouse and will continue to do so following retirement; that property is therefore unavailable to meet the essential need associated with the application site. Furthermore, Woolley & Wallis is not aware of any other suitable and available dwelling near the holding that would allow the essential functional requirements to be met without compromising livestock welfare.
- 11.6** The proposal for the erection of a permanent agricultural worker's dwelling is therefore considered compliant with the National Planning Policy Framework and the relevant Local Plan policy.