

PLANNING DESIGN AND ACCESS STATEMENT

**IN SUPPORT OF A PART RECTROSPECTIVE APPLICATION TO
WILTSHIRE COUNCIL, (THE LPA), IN RESPECT TO THE
RETENTION OF AGRICULTURAL DEVELOPMENT CARRIED OUT
ON LAND KNOWN AS HARES BROOK FARM, (THE PROPERTY),
GREENWAY, TOCKENHAM, NR LYNEHAM, SN4 7PW TOGETHER
WITH NEW OPERATIONAL DEVELOPMENT ON BEHALF OF THE
FARMING PROPRIETOR, MR BEN TRUSWELL, TRADING AS
HARES BROOK FARM**

1. Introduction

Haresbrook Farm is located to the south east of the village of Tockenham, itself some three miles distant and to the south west of Royal Wootton Bassett. The market town of Malmesbury is about 9 miles away.

When purchased the Property amounted to a single pasture field extending to some 2.51 hectares (6.19 acres). Since acquisition the Proprietor has laid out an area of hardcore to the north boundary gate entrance from the highway known as Greenway and has assembled on site certain structures which in discussion with representatives of Wiltshire Council, (the LPA), are accepted to be buildings for the purposes of planning legislation.

This and other agriculturally related work has been carried out as part of an established farming business. It is for this reason that the Proprietor (with his wife, the (joint) Applicant) wishes to regularise the position. In early 2026 the Applicant entered two farm business tenancy agreements for the agricultural use of pasture land located on the north side of Greenway (known as the Field of Dreams) until September 2032 thereby extending the agricultural unit to 6.17 hectares, (15.25 acres), or thereabouts.

Under the General Permitted Development Order the Applicant made a prior notification submission to the LPA in February 2026 (LPA reference PL/2026/01193) for the construction of a three bay open fronted portal framed agricultural building (13.72 m x 7.62m). On 23rd March 2026 the LPA confirmed its determination that prior approval was not required enabling this authorised development to take place.

This statement sets out the extent of the previous development implemented without planning permission and the proposed development; reviews national and Development Plan policy before addressing local and site specific criteria.

2. Unauthorised Development and Proposed Development

The planning application seeks firstly retrospective permission for the retention of the existing:-

- (1) hard core area entrance to the Property.

and as new operational development:-

- (2) a replacement market gardening potting tool / shed and vegetable wash station using the site of the existing building,
- (3) a proposed extension from the existing hardstanding to link in with the new hard standing (to include a turning area) to be constructed on the north east side of the authorised permitted development agricultural building, and,
- (4) the construction of a replacement polytunnel using the site of the existing building.

More specific details are given in part 6 of this statement.

3. Designations

The village of Tockenham lies outside the western extent of the North Wessex Downs Area of Outstanding Natural Beauty (since designated a National Landscape).

The nearest Site of Special Scientific Interest to Haresbrook Farm is several miles away at Restrop Farm and Brockhurst Wood approximately a mile to the south west of the village of Purton on the north side of the M4 motorway.

Tockenham is understood to be included within the Wiltshire and Swindon Local Nature Recovery Strategy, (LNRS), Area. That said, on perusal of the interactive map for the strategy, the nearest LNRS Strategically Significant Habitat Network is to be found in the more historic part of Tockenham being to the north of The Field of Dreams and to the south west of Queen Anns Court.

There is an ancient woodland located at Trow Lane, Grittenham, being a village to the north of Tockenham.

By reference to the Tockenham Neighbourhood Plan 2019-2026 (which forms part of the Development Plan for Wiltshire), Haresbrook Farm and the wider agricultural unit as above described sits well clear of the land associated with and the reasonable setting of several listed properties in the more built up and southern part of the village. The Property lies a commensurate distance from the listed Greenway Farm House. In turn it is reasonable to state that the development the subject of this application will have no adverse impact in this regard.

Map E – Special Areas and Views - of the above mentioned Neighbourhood Plan identifies what are described as Tockenham Areas for Protection. There is a red coloured area primarily on the northern side of Greenway (touching Haresbrook Farm at its far northern end) but the same does not otherwise include the Property.

Policy 7 – Special Areas Views – of the Neighbourhood Plan seeks to ensure that development does not compromise what is described as the essential character of, in this particular case, the open countryside view across to Clyffe Hanging referred to in the Policy and located on the north side of Greenway. It is submitted that such views are not affected by this planning application.

By reference to the LPA's Wiltshire Planning Explorer on line facility there are no Special Landscape Area designation, no Conservation Area or Tree Preservation Orders for the near locality and no public rights of way over or affecting Haresbrook Farm.

With these collective matters having been researched it is reasonably apparent that there are no current designations which could reasonably have an influence on the siting for and design of the component parts of this application.

4. National Planning Policy Framework (NPPF)

The National Planning Policy Framework was re-published by the Ministry of Housing, Communities & Local Government in December 2024 (with minor amendments made on 7th February 2025). Under its paragraph 2 the NPPF states that the document is a material consideration in the determination of planning applications. As part of the decision making process there is a presumption in favour of sustainable development in paragraph 11 (repeated in the last sentence of paragraph 39) which accords with an up to date Development Plan. Paragraph 48 comments that, *"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise."*

In regard to the rural economy at paragraph 88 it is noted that the NPPF directs planning policies and decisions are made to enable *"the sustainable growth and expansion of all types of business in rural areas"* allied to the *"development and diversification of agricultural and other land-based rural businesses"*. Adherence in this connection is set out below.

In the early part of this year the Government has consulted on a revised NPPF which closed on 10th March 2026 for which a draft was published in December 2025. Attention is drawn to the national decision making policies part of the consultation from page 40 and to the proposed policy E4: Rural business development and its application to policy E2 (Meeting the need for business land and premises). An extract from the NPPF consultation is provided under Annex 1. Reference in particular is made to these parts of policy E4, viz:-

- the development and diversification of agricultural and other land-based businesses, and,

- development to support domestic food production through the provision of amongst other on farm developments, improved livestock accommodation greenhouses and polytunnels.

Further, E4 acknowledges the needs of businesses in rural areas to be located “*outside settlements, and in locations that are not well served by public transport*” as is the understood situation at Tockenham. Meanwhile the Applicant by agriculturally developing the land at Haresbrook Farm is doing so on property which is reasonably as E2 continues, “*physically well-related to existing development*” with nearby buildings located within reasonable walking distance.

5. Development Plan and Planning Policies

On its web site the LPA advises that the Development Plan includes the Wiltshire Core Strategy (adopted in January 2015) to include saved policies from the former North Wiltshire District Council’s Local Plan 2011 together with the Tockenham Neighbourhood Plan 2019-2026. The Wiltshire Local Plan review process is understood to be approaching the stage where independent examination by the Planning Inspectorate is to be carried out.

The emerging Local Plan is therefore gaining in material weight. It is understood that this plan supports the rural economy whilst seeking to maintain landscape protection through chosen development site location to mitigate harm and for site specific development to be size appropriate. Enhancement of local distinctiveness to include hedges, trees and watercourses is promoted.

From the Wiltshire Core Strategy the following policies are considered applicable:-

CP 34 Additional employment land – whilst written in the wider context of employment provision, taken from numbered paragraph 6.12 of the Strategy, Core Policy 34 “... *aims to support the rural way of life through the promotion of modern agricultural practices, (and the) appropriate diversification of the rural economy ...*”

More particularly Policy CP 34 supports sustainable farming and food production at locations outside what the Strategy describes as Principal Settlements, Market Towns and Local Service Centres (criteria (ii)). More relevant for this planning application, in respect to new and existing rural based businesses which are located adjacent to large and small villages, (as is the case at the Property), subject to meeting sustainable development objectives and which show consistency in scale with their location and don’t adversely affect nearby buildings or residential amenity are Policy compliant.

For the purposes of policy CP 34, in the absence of inclusion as a large village, Tockenham is regarded as a small one but nevertheless the proposed development accords with the various stands of the policy’s aforementioned objectives.

Policy CP 48 – supporting rural life - includes provision for the protection and maintenance of the countryside. The development proposals as described in this statement through their scale and specific design for agricultural purposes all adhere to this Policy’s approach.

Policy CP 51-Landscape – as explained above, the Application Site is not within a local landscape designation. The collective development proposals will help in the longer term to aid the continued protection and vitality of, for example, hedges at Haresbrook Farm.

Policy CP 57- Design – within the limitations which design of agricultural buildings to accord with their function enable, consideration has been given towards good design in keeping with what will often be found on small holdings.

The single saved policy of the former North Wiltshire District Council’s Local Plan 2011 to which mention is made is in respect to Policy NE14 - Trees - and the control of new development. No trees are affected by the development proposals.

Tockenham Neighbourhood Plan 2019-2026

From the Neighbourhood Plan reference is made to Objective 1 which seeks, inter alia, to encourage and support appropriate small business. In the context of Policy 1 (New and Existing Employment) policy support is offered to those proposals which: -

- mitigate significant impact on the local road network
- are proportionate in scale and in keeping with the parish’s existing character
- don’t affect nearby buildings
- respect the context, character and appearance of the local area to include through appropriate use of building materials
- where possible are associated with existing buildings.

Policy 2 – Farm and Equestrian Diversification – likewise offers support again to such development where significant impact on the local road network is avoided; use is appropriate to and in keeping with the local surroundings and the scale of activity does not generate unacceptable levels of noise, pollution or neighbourly nuisance.

Comment: the modest scale of agricultural development the subject of the planning application is in general harmony with these two Neighbourhood Plan policies.

6. Involvement / Pre-Application Consultations

Dialogue with two planning representatives of the LPA took place in the second half of 2025. It was a useful exchange. Two local neighbours have let their land located on the northern side of Greenway to the Applicant for seven growing seasons’ production. Both landlords have been consulted on this application’s proposals and are understood to be to be supportive.

The Applicant has also liaised with the planning representative of the parish council to keep this person informed. A site meeting has recently taken place between the two from which discussion the Applicant has advised no adverse comments on the planning proposals were put forward by this representative. Other near neighbours have been approached for comment.

7. Merits

In terms of livestock in the second half of February 2026 the Applicant was keeping on the Property as a “snap shot”:-

6 fattening pigs;
16 goats (including 12 breeding does),
9 Herdwick sheep and a,
Flock of chickens circa 50 in number.

These numbers are gradually rising.

Whilst the pigs have since been sold fat, four weaners are due to arrive in May. As at mid April 2026 the farm has 21 goat kids with 1 doe soon to give birth. During this month the farm has some 340 egg laying chickens reported by the Applicant to be laying presently approximately 350 eggs per week.

More specifically in regard to the three aspects of this application:-

A. The existing hard standing area entrance to the Property (1) and (3) the proposed extension to the Permitted Development Agricultural Building

The existing area of hardstanding from the entrance to the Prosperity on the south side of Greenway, the highway, is understood to be 182 m². The hardstanding provides sufficient an area for a vehicle to be driven on to the site, to be parked and to manoeuvre thereby enabling the vehicle to leave the Property in a forward gear.

To avoid the unreasonable loss of productive land the area of land originally laid out with hardstanding has been minimised.

In the knowledge that no prior approval for the permitted development agricultural building is required from the LPA, the Applicant intends to make an extension to provide a vehicular link between the existing hard standing and this new building's north east frontage hardstanding allied to a turning area, in all for a further 323 m².

This proposal will enable year round access to the new agricultural building thereby avoiding vehicular ruts from developing and allowing the adjoining pasture not to be unreasonably disturbed over the winter period.

B. The Poly Tunnel (4)

As part of the Applicant's business planning a poly tunnel was erected initially in the autumn of 2024. Storm damage in late September 2025 meant that the original was beyond reasonable repair. A more substantial poly tunnel measuring 20 m x 10 m and with a semi circular top height of 3.50 m is proposed, (the Malcolm Hughes drawing number 60270 – 2 refers).

During the second half of 2025 the Applicant circulated a representative sample of the local community Expression of Interest sheets the responses from which has been positive as to local demand for vegetable production both with the new poly tunnel and on open ground. This response has been and continues to be supported by a WhatsApp group in the village of Tockenham.

The Applicant anticipates supplying a nearby public house and a cafe with regular vegetable boxes together with the feeding of up to ten families in 2026 onwards with weekly boxes. Gradual scaling up can take place in the second half of 2026 or sooner once planning permission is granted.

C. The Market Gardening Potting Shed and Vegetable Wash Station (2)

As background, by the end of Summer 2025 parts of the then mainly pasture land had been under tillage through the laying out of ¾ metre wide strips for the production of vegetables over some 300 m overall length. Allied to the use of the proposed poly tunnel, facilities for the preparation, cleaning and packaging of vegetables and fruit produced at the Property ready for the market outlets as described is reasonably required.

Dimensions of 7.30 m x 3.61 m for a monopitch south facing open fronted shed with an east lean to (2.45 m x 3.61 m) are given on the Malcolm Hughes drawing number 60270 – 2.

8. Highway Access and Visibility Sight Lines

Haresbrook Farm has a recessed north boundary four metre wide vehicular access directly onto the highway known as Greenway, a classified road which is in a slightly elevated position relative to the Property. The full access frontage to the road amounts to some 19 metres from west to east providing an informal lay by for what is in effect a narrow country lane. There are grass verges to both sides of the highway.

Seven metres south of the metalled part of the highway there is a functional culvert serving the ditch prior to entering the Property.

It is understood that the speed limit along Greenway is 30 mph. At this limit according to the Ministry of Housing, Communities and Local Government together with the Department for Transport's publication, "Manual for Streets," national guidance sight

line visibility splays of 2.4 metres by 43 metres are required. This enables a driver sitting in a vehicle 2.4 metres back from the highway edge to see at least 43 metres in both directions for reasons of road safety.

At the point of leaving the Property vehicle sight lines are good with west visibility towards the main part of the village over 80 metres and approximately 70 metres eastwards. In turn no improvement to the existing access layout is required.

9. Building Design and Landscape Impact of Development Proposal

Little can reasonably be said about the existing hardcore adjoining the entrance to the Property save that it serves its purpose well. Likewise the extension to the site of the permitted development agricultural building will meet the same standard.

The timber framed and clad market gardening potting tool / shed and vegetable wash station has been designed to be in keeping with its agricultural / horticultural function. It is modest in scale, being just over 35 m² in floor area.

The metal framed and toughened plastic sheet covered polytunnel is size appropriate, (200 m² in floor area) and its design accords with its function. Its top height limited to 3.50 metres. The poly tunnel's design is in keeping with what is to be routinely seen in the countryside for a building of this nature.

It is material to note that the LPA concluded in its consideration of the prior notification for the agricultural building (PL/2026/01193) that whilst the three bay barn will have a ridge height of 4.88 metres and will be capable of being seen from Greenway the LPA nevertheless by inference decided that in terms of siting, design and external appearance it did not have concern sufficient to call in the matter for LPA prior approval under the provisions of the General Development Order.

In turn with both buildings the subject of this application with a top height below 5 metres it is reasonable to state (taking in to consideration the absence of landscape designations affecting or being affected by the proposed development (part 3 of this statement above refers) that no demonstrable harm arises in granting planning permission.

10. Surface Water

In keeping with the Applicant's approach to sustainability, where reasonably possible surface water will be collected from the monopitch roof of the market gardening potting tool / shed and vegetable wash station. Rainwater will naturally drain away from the polytunnel to adjacent land.

11. Contamination and Pollution Issues

From information supplied by the Applicant there is no known source of contamination present to affect the application site. Such issues in this case are generally not applicable.

12. Noise

No noise issues can reasonably be expected to arise from the existing and the proposed development.

13. Flood Risk Assessment

According to the Gov.UK website the land at Haresbrook Farm lies within Flood Zone 1 with the lowest risk of flooding from seas, rivers and other surface waters. In turn no Flood Risk Assessment is separately required.

14. Bio Diversity Net Gain (BNG)

In respect to Biodiversity Net Gain a Preliminary Ecological Appraisal Survey Report dated 14th April 2026 for Haresbrook Farm produced by Wessex Ecology accompanies the planning application. It has identified 14.73% as being the reasonable BNG measure to comply with and exceed the minimum 10% BNG statutory planning condition requirement for the extent of development which this application describes.

The methodology and other reasoning to achieve this measure of BNG is set out in a sister document entitled - Haresbrook Farm Biodiversity Net Gain Plan. Copies of both documents accompany the planning application.

15. Community Infrastructure Levy

A completed copy of Form 1: CIL Additional Information is provided with the planning application.

16. Other Buildings and Structures

Following discussions at a site meeting with representatives of the LPA on 15th December 2025 the Applicant confirms that he will accept a planning condition for the removal of those buildings identified in Annex 2 from the Property within six months of the date of a certificate of planning permission being issued.

17. Other Matters

As no heritage assets, hedges or trees are affected by the development proposals no reports in respect to these matters are submitted.

18. Conclusion

Taking account of national policy, the saved former local planning authority's Local Plan policy and other material considerations it is submitted that the given planning criteria are met to enable planning permission to be granted for this application.

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April 2026

Annex 1

National Planning Policy Framework Plan-making and national decision-making policies

Consultation by the Ministry of Communities & Local Government December 2025

Extract Taken from page 40: National decision-making policies

E2: Meeting the need for business land and premises

1. To support business growth, substantial weight should be given to:
 - a. The economic benefits of proposals for commercial development which allow businesses to invest, expand and adapt; especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy³⁵, support improvements in freight and logistics and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones;
 - b. Benefits for domestic food production, animal welfare and the environment which can be demonstrated through proposals for development for farm and agricultural modernisation.
2. Where a development proposal is required to demonstrate whether an unmet need exists (including to demonstrate compliance with policy S5) consideration should be given to whether:
 - a. Market signals indicate an undersupply of specific types of land or premises, taking into account the anticipated catchment area for the type of development proposed, the changing needs of different sectors and the availability of existing land and buildings; or
 - b. A development proposal's specific locational requirements are met by existing allocations in the development plan. This includes, but is not limited to, situations where:
 - i. existing businesses plan to expand or improve their premises, or clusters or networks of businesses need to grow (such as clusters of knowledge and data-driven, creative or high technology industries and associated facilities and infrastructure); or
 - ii. the availability of infrastructure (such as adequate grid connections or water and wastewater capacity) makes certain locations particularly important, including opportunities to co-locate large-scale generators and users of power (such as data centres); or
 - iii. proposals would meet a local, regional or national need for the provision of new, expanded or upgraded facilities that would result in more efficient, reliable or sustainable handling of goods (whether for their receipt, storage, processing, interchange or distribution).

E4: Rural business development

1. In applying policy E2, the sustainable growth of businesses in rural areas should be supported, including through:
 - a. The conversion of existing buildings and well-designed new buildings;

- b. The development and diversification of agricultural and other land-based businesses;
 - c. Facilities to support rural leisure and tourism and measures to retain and expand accessible local shops and services; and
 - d. Development to maintain and enhance farm viability and sustainability and support domestic food production, such as better accommodation for livestock, on-farm reservoirs, greenhouses, polytunnels, farm shops and temporary accommodation for seasonal workers (where this accommodation is ancillary to the agricultural use and not for permanent occupation).
2. Development proposals to meet business needs in rural areas may need to be located outside settlements, and in locations that are not well served by public transport. In these circumstances:
- a. Development proposals should take opportunities, where they exist, to use previously developed land, and sites that are physically well-related to existing development; and
 - b. The siting and design of development should be appropriate having regard to the character of its surroundings.

Annex 2

Part 1: Schedule of Buildings agreed with the LPA for removal from the Property after the grant of planning permission

Z - Garden type shed with compost loo together with removal collectors 1.8 m x 1.2 m

Y - Garden type shed used for agricultural tools and consumable storage 1.8 m x 1.2 m

X - Lean-To feed preparation facility with dry area for feed storage and washing 3.2 m x 2 m

W - “Pole Barn” type assembly with tarpaulin roof (easily removable) used for hay storage and the milking of goats 6 m x 4 m (presently in mid April 2026 in the course of being dismantled)

Part 2: Schedule of Buildings agreed with the LPA for removal from the Property after the grant of planning permission and replacement with two open fronted moveable structures

V - Goat accommodation constructed of HGV pallets screwed together to provide assembly 2.4 m x 6.1m