

Planning Statement and Agricultural Justification Report to Support
an Application for a Livestock Housing Building at Upper Combe
Farm, Castle Combe, Wiltshire SN14 7HE

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On behalf of W P Prior & Sons
Upper Combe Farm, Castle Combe, Wiltshire SN14 7HE



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1. Introduction

Holly Greenman of Foscombe Rural Consultancy Ltd has been instructed by W P Prior & Sons to prepare an application for planning permission for a new livestock housing shed at Upper Combe Farm, Upper Caste combe, Wiltshire SN14 7HE.

The proposal is being sought to enable the well- established dairy business to continue improving welfare standards, improve efficiency and ensure the sustainability of their agricultural enterprise.

The purpose of this Planning Statement is to review the site's planning history, design and access specific context and the proposal's conformance with both National and Local Planning Policy. It will also address the essential need for such a building in terms of agricultural activity and in the context of the farming business.

2. Background

W P Prior & Sons is a family partnership comprising John and Ben Prior, their mother and wives. Both John and Ben are employed full time upon the farm, which operates as an organic beef and dairy unit. The family have been farming at Upper combe farm since 1938, expanding and developing their enterprises and practices since.

Today, the farm business occupies approximately 400 hectares (approximately 1,000 acres) of which around 242 hectares (600 acres) is owned, with the remainder of the land being occupied under Farm Business Tenancies and Contract Farming arrangements. The planting policy focuses on forage production to support the dairy and beef enterprises, with the business placing high importance upon milk production from home grown forage. There is also a small proportion of arable crop production, to diversify income streams, and to provide an essential break within the planting rotation.

Upper Combe Farm is the centre of the farming operations and is the primary owned holding. All of the farmed land is located in and around Castle Combe. A plan of the farmed area can be seen in Appendix 1.

The dairy supplies milk to Yeo Valley Dairy from their herd of 250 pedigree Holstein cows. The business rears all its own dairy replacements with surplus heifers being sold to diversify its income streams. A beef enterprise is also in operation, with youngstock generally being kept on farm until circa 14 months and sold as strong stores.

Resultantly, livestock numbers across the holding extend to approximately 550 head. All of the housing is centred around the Upper combe farm site.

3. The Proposal

The proposed livestock housing building will be erected to the east of the existing farm buildings, adjoining the existing livestock shed in a mirror image. The total internal floorspace of the building will extend to 689 square metres, providing cubicle housing space for approximately 70 dairy cows, along with covered feed passages and scrapable loafing areas. A 2.13 metre awning will extend to the eastern elevation, covering a concrete feed apron that runs the length of this elevation, enabling ease of access for feeding by a trailed wagon and tractor.

The building will be fitted with a concrete floor, suitable for animal housing and designed to be easily scraped clean, with all excreta scraped to a central muck collection point, and then fed into the slurry store.

Concrete panels will line the walls to circa 1.9 metres in height on all sides, with timber Yorkshire boarding extending above this to the eaves. The roof will be of a grey fibre cement sheeting. The building will be identical in materials, colour, height and dimensions to the existing building that will lie next to it. Two entrance ways will be left on the end (Northern and Southern) elevations, to enable access by tractor to the building.

A vented ridge will ensure good ventilation for the dairy cows being housed within. In total, the building will extend to 7.45 metres tall at the ridge, and 5.5 metres to the eaves.

4. Agricultural Justification and Need

The new dairy cubicle building will provide housing for up to 70 dairy cows, and will largely be utilised by the 'dry' cows (cows that have come to the end of their lactation, and are shortly to give birth). This is an essential time in dairy cow management, and the existing housing at Upper Combe Farm for dry cows is sub-standard to the welfare facilities that the Prior's strive to achieve, as well as starting to impact their bottom line owing to the associated inefficiencies.

Current dry cow housing is in a traditional, dutch- barn style tin-clad shed that lies in the centre of the yard. This covered open-yard has poor ventilation, and the supporting stanchions which stand in the centre of this area make access by large machinery very difficult, as well as clearing and scraping of this yard area behind the cows. The total area available for cows to feed from in this yard is also limited, impacting cow nutrition, which at such a critical stage in their pregnancy, could result in poorer calves as well as a drop in milk production.

Poor ventilation in cattle housing is associated with the spread of airborne diseases such as pneumonia in winter. In the recent dry, hot summers it also contributes to heat stress

in cows, which can be fatal. In all, this current set up is unsuitable for modern, efficient dairy farming and expanding the housing facilities to elsewhere on the farm enables far better cow management. It will also improve feed efficiency, enable greater control of diseases such as mastitis owing to better and more thorough cleaning, and a larger, more ventilated space improving cow health.

5. Planning Policy Context

Section 70 (2) of the Town and Country Planning Act 1990 provides that, in dealing with proposals for planning permission, regard must be had to the provisions of the Development Plan, so far as material to the application, and to any other material considerations.

National Planning Policy

The National Planning Policy Framework (NPPF) provides the Government's planning policies for England and explains how they should be implemented. It is a material planning consideration.

The following elements are believed to be particularly pertinent to the assessment of the proposal that is the subject of this application:

Paragraph 8- Dimensions of Sustainable Development

Paragraph 11- Presumption in Favour of Sustainable Development

Section 4- Decision Making

Paragraph 88- Supporting a Prosperous Rural Economy

Paragraphs 189 – conserving and enhancing the natural environment

Local Planning Policy

The relevant statutory development plans in respect of this application consist of the Wiltshire Core Strategy (WCS) adopted 2015. Though it is necessary to consider the development plan as a whole, the parts most pertinent to this application are as follows:

- Core Policy 1: Settlement Strategy
- Core Policy 2: Delivery Strategy
- Core Policy 50: Biodiversity and geodiversity
- Core Policy 51: Landscape
- Core Policy 57: Ensuring high quality design and place shaping

The main issues in the consideration of this application are:

- Principle of development
- Proposed design and the impacts on local character/ amenity
- Drainage and surface water management
- Ecology
- Highways
- Other Designations

6. Planning Appraisal

Principle of Development

The proposal would serve an established and agricultural enterprise, where the principle of other agricultural development has been present and regular for decades as the business has expanded, adapted and diversified their agricultural enterprises.

Farming cows brings with it complex and highly regulated requirements relating to minimum space, feeding logistics, health and safety infrastructure and proper cleaning and management of excreta. All of this is highly challenging in the existing buildings on the farm, and the business has chosen to invest into more modern and suitable housing facilities, that will improve efficiency and sustainability of the business long-term.

The proposal is necessary and desirable for good farming practices, and so is consistent with policy and preceding developments for no objection in principle to be raised to development in the countryside where there is an agricultural need.

Proposed design and impacts on local character/ amenity

The proposed building is, quite deliberately, exactly the same in appearance, scale and height as the existing cattle housing building on the site to which it will lie adjacent. The site is currently vacant, being a largely unutilised area of a grass field. The positioning of the building here has been chosen as it enables the easiest integration of the new housing within the existing infrastructure on the farm, in terms of vehicle movement areas, slurry scraping and storing procedures and proximity to silage and feed stores.

The new structure would be seen within the context of the working farmyard, with no further intrusion to the landscape or any particular view from any aspect and is intended to integrate with the existing farmscape.

The site lies within the Cotswold National Landscape (Area of Outstanding Natural Beauty) however, and so due consideration must be given to this designation and also to the nearby Castle Combe conservation area, which part of the farm falls within. Paragraph 189 of the NPPF outlines how weight should be given to protecting these designated areas, and development within these areas should be sensitively located and designed to minimise adverse impacts upon the designation.

This notwithstanding, the site is clearly a working, productive farm and the design and the scale of the proposed building is commensurate with its function and needs, and would not appear out of place in the context of other development on the site or elsewhere within the local rural location.

The threat posed therefore to either designations is considered to be minimal, and in any event, must be balanced against the need for an agricultural business to be able to make sustainable and progressive developments, and to enable greater efficiencies and welfare to livestock.

Drainage and surface water management

The proposed building has been designed to ensure the effective separation and management of clean and dirty water in accordance with relevant agricultural best practice and regulatory requirements. Rainwater falling on the roof will be collected via gutters and downpipes before being discharged into the existing surface water drainage system, which outfalls to a nearby ditch as clean water.

The building incorporates a 4.2-metre concrete apron to the eastern elevation, of which 2.5 metres is protected by the roof overhang. Any rainwater falling onto the apron that becomes contaminated through contact with cattle feed will be managed as dirty water. The apron will be regularly scraped, with contaminated material transferred to the existing central muck store, and any resulting effluent directed to the farm's existing slurry store. The slurry store has sufficient capacity to accommodate the additional volume arising from the proposed development and is compliant with the relevant storage capacity and environmental management requirements, ensuring that the proposal accords with current guidance on the handling of clean and dirty water on agricultural holdings.

Ecology and Biodiversity Net Gain

The proposed development is located within a small area of underutilised grassland surrounding the existing farmstead. The land is not actively managed for agricultural production, grazing or haymaking and is instead subject to periodic encroachment by bramble scrub, resulting in a habitat of limited diversity and ecological interest.

Whilst no formal ecological survey has been undertaken, there are no obvious indications that the site supports habitats of particular ecological significance, and the proposal is confined to an area that is already closely associated with the existing farm buildings and associated activity.

The proposed development has a footprint of less than 2,000 square metres and is therefore exempt from the statutory Biodiversity Net Gain (BNG) requirements introduced under the Environment Act 2021, in accordance with the small sites exemption that came into effect on 1 August 2026. As such, the proposal is not required to deliver measurable biodiversity net gain, although the development has been designed to minimise any potential ecological impacts wherever reasonably practicable.

Highways

No alternative access routes are proposed as part of the application with sufficient access infrastructure already in place.

The building will not increase traffic movement to and from site, nor increase movement around the site itself. The operational safety of the Highways and of the farmyard is not considered to be impacted by the proposal.

Other Designations

Aside from the previously addressed location within the National Landscape, and the close proximity of the Conservation Area, the site is not considered to have any further relationship with specially designated sites or buildings.

Upper Combe Farmhouse is Grade II listed, and lies approximately 120 metres to the west of the proposed site. The impact of this new building upon this Listed Building is unlikely to be significant when considered the other agricultural buildings that infill this space and have been present for many years.

A Scheduled Monument “Long Barrow 240 m south west of Green Barrow Farm” lies approximately 320 metres to the southeast of the site. This monument is on land managed by the applicant, and the proposal is not considered to cause any impact to this site either in construction or in its use.

No public footpaths cross the site or within view of it, though the Public Byway WT/CCOM/16 crosses in a Northwesterly to a southeasterly path approximately 400 metres to the east. The proposal will not interfere with this publicly accessible path.

No further Sites of Special Scientific Interest are nearby, nor historic or significant features.

7. Conclusion

W P Prior & Sons are hardworking, progressive and conscientious farmers who seek a new livestock housing building to facilitate necessary improvements to cow health and welfare on their farm.

These improvements will also enable greater efficiencies in forage use, time management, muck and nutrient management and disease control. Making strategic investments into such improvements is exemplar farming practice, and something that governmental policy and plan-making should consider worthy of support.

The building is considered necessary for the purposes of agriculture, and will enable positive business development which is consistent with the requirements for rural development under the NPPF. The siting and design of the building are considered the most logical, making best use of existing infrastructure and offering the most practical solutions to the evolving needs of the business.

