Old Orchard
Spirthill
Calne
Wiltshire
SN11 9HP

30th November 2023

Steve Tapscott
Planning Case Officer
Wiltshire Council
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Dear Mr Tapscott

PL/2023/09303 - change of use, entrance, access, campsite

I have been a tenant of the applicant for over ten years. I rent eight acres of agricultural land to graze my horses. There is a small yard and an arena (20/03756/FUL approved with conditions). The arena abuts the proposed camp site by approximately ten metres. This factor was missing from the block plans submitted by the applicant.

As a long term tenant, I was surprised not to be included in the consultation letters and there were no green planning notices erected, so there has been little time available for a true consultation period.

However, below are my observations regarding this application:-

1. Lack of detail in the application in the following areas:-

i. Entrance to the site

It is proposed that access to the site is through a small gated area and using an existing track. The application lacks detail about how the access will be created to effect safe and timely passage from the lane to the track and vice versa. There are no measurements about how wide the entrance will be or how far back the entrance will be situated. Given the access track drops down into the Orchard, there will need to be some redesign and visibility splays will need to be incorporated similar to Tucks Farm.
There is mention of putting up a mirror to assist drivers.

ii. Access track - existing

The existing track is currently unused. It drops away from the main road and measures 3 m from the lane and reduces in width when it reaches the pond. Therefore, it may need widening. There is no detail about how this will be completed, or how wide it needs to be. It would be useful to have drawings with measurements of the existing track and the proposed track.

iii. Passing place

The application recognises there needs to be a couple of passing places, however, there is no detail of exact location relative to the existing track and how wide and long each passing place will be.

iv. Access track - new

Mentions it will be 3 m wide but not how long or what materials will be used or how it will be built. Again, drawings to reflect what is to be developed would be helpful.

v. Car parking area

This is shown on the block plan but there are no other details associated with the parking area such as the length, depth and width of the proposed area. What materials will be used to construct the parking area? Referring to the block plan, it looks like the parking area will be situated near or directly opposite an open slurry pit. Are there any Health and Safety considerations required?

vi. Tree and hedgerow removal

There is a report within the application to look at the impact of tree and hedge removal. It is not clear how many meters of hedgerow will be removed, or the size of the area for shrub and tree removal.

The report states there will be a landscaping scheme agreed with the Local Planning Authority, on new planting of trees and hedgerows to mitigate the removal of existing ones. Why isn't there details included in the planning application?

vii. Surface water

Such removal of trees and shrub will impact the ability of the area to retain water and with the introduction of a parking area, there will be water run off associated with the development. The widening of the access track and creating additional track will also introduce the potential for water run off and included oil/diesel to end up in the pond.

There is no answer to the question on the application form as to "how will surface water be disposed of?"

viii. Treatment of foul waste, wet waste and rubbish/recycling

The applicant has stated in the application form that the disposal of foul waste is 'unknown' but that it will not be via the existing drainage system (see application form for reference). In the supporting documents, there is no mention of how this waste will be collected, treated and disposed of in an environmentally safe way. This is of paramount importance for an application of this type and detail needs to be provided and adhered to should the application be approved.

The same can be said of wet waste such as washing up waste and general water disposal. There is no detail that outlines the provisions for this type of waste in the application.

What is to happen to the rubbish and food waste that is generated by the campers? There is no mention of where this is to be kept, how it is to be managed and stored, and how it is going to be disposed of. No considerations have been given to how recyclable waste it to be separated from the main rubbish, how it is to be stored and how it is to be

disposed of. There is a danger that without mechanisms in place, the general public will end up littering the hedgerow that runs alongside one edge of the campsite or along the roadside.

ix. Toilet / shower block

It is not clear within the application how many toilets / shower blocks are envisaged. Nor is it clear how the blocks will be supplied with water for showering, flushing and drinking water. How is this water going to be stored and where is it being generated from?

If there are ten tents, with, on average, 2 adults occupying each tent and if the campsite is at full capacity, will one toilet/shower block be enough to fulfil demand? If people have to wait to use the facility, there is a danger that an alternative will be sought be it in the wooded area or along the hedgerow.

x. Traffic

It is stated within the application that there should be no increase in additional vehicle traffic as the campers can walk to the local amenities such at the pubs and shops.

Firstly, the nearest pub, The Foxham (in the village of Foxham) is 2.2 miles away and cannot be accessed solely using the Public Rights of Way (PROW) network. There is about a mile of road to walk before reaching a footpath (BREM16) and it is down a 1:6 hill. In total, it would take 50 mins on average to walk there.

The Dumb Post, situated in the village of Bremhill, can be visited by mainly using the PROW network but at 2.8 miles away it will take on average 60 mins to walk one way.

The other pub, outside of the Parish, is in Christian Malford, as is a local general shop and post office. These can only be accessed via the road network.

There are no pavements or street lighting and it would be difficult for families with young children to visit these local pubs on foot. Therefore, cars will be used.

2. Local economy

The application states the camping site will support the local economy through selling vegetable and meat boxes. The parish of Bremhill is predominantly permanent pasture and meadows, grazed by cattle and some sheep. The meadows provide hay and silage crops. The small percentage of arable land is used is to grow maize.

It may be possible to sell meat boxes commercially but there must be a stated approach within the application to food handling, hygiene and storage of these boxes, in the correct refrigeration units. There is no mention of how this would work in reality.

3. Scale

It is noted in the application that the site for pitching ten tents is 0.77 ha or nearly 2 acres (1.9) of land. This seems quite large for the amount of tents. In the past, the applicant has only talked about a caravan site and there is potential that this site grows exponentially to incorporate caravans, motorhomes and the like.

4. Camping

There is no mention how the campsite is going to be managed. It would be good to have an idea of the following considerations so that neighbours will know what to expect:-

- Only tents bought in from the public can be used; no permanent tents, pods, or glamping style units
- Families only to avoid potential for hen and stag dos.
- No more than three tents per group No amplified music at any time and curfew of music between 10 pm and 7 am.
- No fireworks what so ever (there is livestock grazing in the adjoining fields on both sides of the farm and neighbouring farm)
- Will there be lighting required for the camp site? If so how will the power be generated, what height, what voltage, when will the lighting be turned off every night?
- Are open fires allowed or is it just bbq? Will there be fire extinguishers available?
- Will dogs be allowed on site? Not allowing dogs will help alleviate any potential for livestock worrying should a dog roam from the camp site

Having the above guidelines in place will help prevent anti-social behaviour, loud music and noise and keep the general peace and quiet for all residents and visitors alike to enjoy.

5. Viability

It is important that the applicant provides further information in order to determine long term viability of taking land from agricultural use and converting to commercial use. Without adequate amenities such as loo and shower blocks with proper sanitation, washing up facilities, site clearance and rubbish disposal, litter picking and appropriate site management it is unlikely that the site will be successful and therefore genuinely financially viable. Without that financial viability, there is a danger that what will happen over time is the despoliation of a good field and the creation of a potentially insanitary eyesore.

6. Equine

I have three horses and use my arena regularly. I have a riding instructor come to give me and my friend a lesson every Friday afternoon. It is worth noting that horses are flight animals and use all their senses to determine whether to flee or not. One aspect is they have excellent hearing “A horse’s hearing is much keener than ours. They use their hearing for three primary functions: to detect sounds, to determine the location of the sound, and to provide sensory information that allows the horse to recognise the identity of these sources. Horses can hear low to very high frequency sound, in the range of 14 Hz to 25 kHz (human range = 20 Hz to 20 kHz).”
(Source: https://esc.rutgers.edu/fact_sheet/the-basics-of-equine-behavior/)

If a horse detects an unusual, perhaps threatening sound, “the horse has a very fast response time. A prey animal must react instantly to a perceived predator to be able to survive.”
(Source: https://esc.rutgers.edu/fact_sheet/the-basics-of-equine-behavior/)
And this fast response typically is to bolt, spin, or rear. Any chance of staying on board is slim. Therefore, I am very concerned for our safety if we were to ride in the arena with campers ten metres away.

Finally, I would like to draw your attention to two of my own planning conditions for the approval of the arena; firstly with regards to external lighting:-

Condition 5
No external lighting or flood lighting shall be installed on site.

REASON: To prevent light pollution and in the interests of the amenities of the area

Condition 4
The development hereby permitted shall only be used for the private use and shall at no time be used for commercial purpose whatsoever, including for livery, or in connection with equestrian tuition or leisure rides.

REASON: In the interest of highway safety and/or to protect the living conditions of the nearby residents

(20/03756/FUL approved with conditions)

If my application did not have condition 4 and I were to have livery or provide tuition, it would not involve ten cars making several journeys a day/night, nor would it have people wandering the lanes, or on footpaths and fields, there would be no litter or waste management considerations, no potential for anti-social behaviour and no livestock protection concerns.

For all the reasons stated above, I object to this planning application.

Yours sincerely
Sarah Jones