AZ URBAN STUDIO

Ivy Farm,
West Yatton, Yatton Keynell, Chippenham
SN14 7EW

Formation of new vehicle access drive for Ivy Farm from the A420 and associated landscape works

Design and Access / Planning Statement

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SN14 7EW

Client:

Mr. Christian Gläsel

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		Status:	Submission
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1. INTRODUCTION

1.1. This combined Design & Access / Planning Statement has been prepared by AZ Urban Studio on behalf of our client, Mr. Christian Gläsel ('the Applicant'), in support of an application for full planning permission for a new vehicle access at Ivy Farm, West Yatton, Yatton Keynell, Chippenham SN14 7EW ('the Site'), with the following description:

"Formation of new vehicle access drive for Ivy Farm from the A420 and associated landscape works" ('the Development')

1.2. The Development is proposed to address existing problems for large vehicles accessing Ivy Farm, as explained further in this statement and other submission documents. It follows pre-application discussions with officers of Wiltshire Council as Highway Authority, and also the refusal of Wiltshire Council (on 05.09.23) as Local Planning Authority to grant planning permission for a previous proposal (ref PL/2023/04919).

1.3. The purpose of this statement is to set out the need for the Development and the considerations that have shaped the proposals submitted, and to assess the Development in the context of planning policy, as well as other relevant and best practice guidance and any other material considerations. Specific reference is made to how the Development now proposed has been modified from that previously refused planning permission by the Council, and also how the reasons for refusal are now addressed by the changes made to the scheme (including additional site area and mitigation planting) and additional supporting information provided.

1.4. The application for full planning permission has been prepared having regard to the Wiltshire Council planning application validation requirements list and comprises the following:

- Application Form and Ownership Certificates
- CIL Form 1
- Site location plan, existing and proposed site plans (prepared by Paul Halford)
- Transport Statement (prepared by Badingham)

- Landscape and Visual Impact Assessment (prepared by Nicholas Pearson Associates)
- Surface Water Drainage Report (prepared by BTA)
- Design and Access / Planning Statement (this document) (prepared by AZ Urban Studio)
- Preliminary Ecological Appraisal (prepared by Stark Ecology)
- Arboricultural Impact Assessment (prepared by Bosky Trees)
- Draft Construction Phase Plan (prepared by Stonewood Builders)

2. THE SITE / SURROUNDINGS AND THE NEED FOR A NEW ACCESS

2.1. Ivy Farm falls within the Wiltshire Council area. Previously, the area was part of North Wiltshire District Council before that authority became part of the amalgamated Wiltshire Council. It is located within the civil parish of Yatton Keynell, and just within the eastern extent of the Cotswolds Area of Outstanding Natural Beauty (AONB).

2.2. Ivy Farm extends to 45ha in total land area and provides extensive equestrian facilities for the owners who compete in a range of equestrian events both within the UK and abroad. The farmhouse (Grade II listed) is located at the western part of the site, and to the east of the house is extensive stabling, yards and a manege. The land at Ivy Farm is generally flat and is well enclosed by mature boundary planting and small areas of woodland.



Image: Aerial photograph showing the Ivy Farm land (part of, extends further to north)

2.3. The entirety of the Site is located within Flood Zone 1 according to the Environment Agency's Flood Map for Planning, meaning that there is a low / very low probability of flooding for the site. The land forming the Site is generally level paddock land, subdivided by a series of timber fenced enclosures.

2.4. The Applicant uses a 26 tonne horse lorry to transport horses to and from Ivy Farm, and it is this large vehicle, together with other typical large agricultural vehicles associated with land management and hay / feed delivery etc. that prove problematic accessing the premises via the existing public highway.

Access difficulties

2.5. Full details of the existing access constraints to Ivy Farm are set out in the *Transport Statement* submitted, with a summary provided here.

2.6. Ivy Farm is currently accessed from Yatton Keynell Road, via Upper Castle Coombe Road which runs north/south, connecting to the A420 approximately 300 metres to the south of the Ivy Farm entrance. Upper Castle Coombe Road is subject to a 7.5t weight restriction (except for access), which highlights the unsuitability for large vehicles such as those required. It is also signed as 'Unsuitable for wide vehicles'. There are no footways or street lighting. There are two key issues associated with larger vehicles accessing Ivy Farm.

2.7. Firstly, upon leaving the A420 and turning right / north into Upper Castle Coombe Road there is a relatively steep and sharp incline in the carriageway, which causes the horse lorry used by Applicant (or vehicles towing trailers) to 'bottom out' at the rear, damaging the vehicle and the carriageway surface. Great care needs to be taken to avoid serious damage to the vehicle, which requires the junction to be negotiated at very low speeds. This type of slow movement of a large vehicle turning across a major road subject to national speed limit also raises highway safety concerns. There are clear signs of damage to the surface of the carriageway from this type of grounding, as confirmed by Wiltshire Council Highways Officers.



Image: Entry to Upper Castle Coombe Road from A420 – note weight restriction and 'Unsuitable for Large Vehicles' warning sign, narrow width and no footway

2.8. Upon leaving the A420, the highway condition is narrow single-vehicle-width lanes with steep hedged banks and / or dry stone walls. The 'triangle' where Upper Castle Coombe Road meets Yatton Keynell Road is also characterised by historic dry stone walling and narrow carriageway. Finally, the narrow (listed) gate piers to Ivy Farm provide a further final challenge upon entry and require a straight approach / exit for larger vehicles. These highway conditions make vehicle access conditions for anything other than cars and small vans difficult, and to access Ivy Farm with a horse lorry requires a complex series of turns and reversing within the carriageway to be able negotiate the 'triangle' and then enter Ivy Farm at a straight angle to avoid the historic gate piers. This situation again results in unsafe movements in the highway and regular damage to the verges and drystone walling of the triangle.



Image: Upper Castle Coombe Road at the triangle – example of large vehicle having difficulties with the road width, witnessed during site visit

2.9. In summary the concerns regarding the existing access to Ivy Farm for the existing equestrian and land management / farm uses are:

- Vehicle and carriageway surface damage at the A420 junction
- Highway safety associated with the necessary caution at this junction for large vehicles
- Highway safety and inconvenience associated with the multiple turns and movements required to negotiate 'the triangle' and the narrow historic gated entrance to Ivy Farm for large vehicles, or when vehicles meet (see image)
- Impacts upon pedestrians and cyclists of large vehicle movements, particularly reversing when meeting other vehicles

- Risk of damage to the verges / walls / gate piers that comprise the historic environment at Ivy Farm entrance

2.10. The Development proposed has been formulated to directly remedy these ongoing concerns.



Image: Approach to Ivy Farm, with the triangle on the left, Ivy Farm entrance gates on the right



Image: Entrance gates to Ivy Farm – note narrow width and historic gate piers

3. THE PROPOSED DEVELOPMENT – DESIGN CONSIDERATIONS

Background and scheme formulation

3.1. A series of options to achieve improved large vehicle access to Ivy Farm were considered by the project team, as summarised below:

a) Modify carriageway gradient at junction with A420 – this is a major engineering undertaking and would require extensive remodelling of a significant length of Upper Castle Combe Road to achieve the required gradient. The second area of concern further north at the entrance would remain. *DISCOUNTED.*

b) Modify 'the triangle' and gates to Ivy Farm to facilitate large vehicle movements. Whilst the land is within the Applicant's ownership, removing large sections of dry stone wall and demolishing / relocating the historic (and listed) entrance gate piers to Ivy Farm House would cause unacceptable harm to the heritage assets engaged. *DISCOUNTED.*

c) Create new access from Upper Castle Combe Road into Ivy Farm. This would not address the issue of the junction with the A420, and would require extensive removal of well established hedgerow to achieve visibility splays. *DISCOUNTED*.

d) Create new access direct from A420. This option has the benefit of avoiding all areas of existing movement difficulties. An area was identified east of the Upper Castle Combe Road junction where the gradient into the Site is minimal, no significant trees or vegetation are present, and sufficient visibility splays can be achieved. *PURSUED.*

3.2. Pre-application engagement was carried out with officers of Wiltshire Council Highways team to further test the principle of establishing a new access for Ivy Farm from the A420.

3.3. A site meeting was held in October 2022 with the project highways consultant Anthony Setter (Badingham Ltd) and Nicola Tilley (Highway Development Control Officer, Wiltshire Council) present. The feedback received by email from Nicola Tilley on 14th October 2022 set out the following:

Thank you for providing me with further detail in regard to the access proposals on site this week. I have discussed this further and would be happy to accept a new access onto the A420 in the location we discussed provided it would achieve the required visibility splay at the access and a forward visibility for the right turning vehicles from the A420. If it can be shown that this would be a betterment in terms of the existing junction, alongside the removal of the grounding issue and access through a weight restricted lane, then that would work in your clients favour. This would be an acceptable location for access from a highways perspective and I cannot comment further with regard to the opinions of other officers within the planning consultation process.

3.4. Following the positive response above from Wiltshire Council highways officer, further assessment of other relevant considerations including ecology, trees, drainage were carried out to inform design development with the following points summarising the key design attributes of the proposals:

- Location selected as lowest impact in terms of trees / vegetation removal, combined with workable gradient into the Site;
- Junction designed by Badingham to achieve all necessary highways requirements to achieve a safe and convenient junction for the intended vehicle size;
- Proposed access designed to DMRB standards. Unobstructed visibility provided to 2.4m x 215m suitable for a 60mph speed limit;
- Proposed access will be low-trafficked, low speed, occasional movements;
- Advance signing of the new access can be provided on the A420 if the Local Highway Authority wish;
- Drainage strategy formulated to ensure no additional surface water enters the public highway;
- The initial section of the new access will be in a hard surfaced bound material to prevent the migration of loose material onto the adjacent highway – future design to meet Local Highway Authority Section 278 requirements.
- Internal gate to open into the site and at a distance from the highway to enable a long vehicle/HGV to store (if gate is closed) without overhanging the adjacent highway.
- Access drive route internally within the Site follows existing field boundary to minimise landscape impact and interruption to existing field use;

- New native tree planting proposed to provide replacement for trees to be removed to form entrance, with additional trees proposed to achieve landscape and habitat enhancement;



Image: View west along A420 from proposed new access point



Image: View east along A420 from proposed new access point

Previous planning application and modifications to address reasons for refusal

3.5. An application for full planning permission for Development of the same description was then submitted to Wiltshire Council on 19.06.23.

3.6. The following consultation responses were provided in relation to that previous application:

- Yatton Keynell Parish Council – *no objection*
- Biddestone & Slaughterford Parish Council – *no objection*
- Public Representations – *no comments made*
- Highways Officer – *no objection, subject to conditions and informatives. Response noted 'betterment of access arrangements to Ivy Farm'. Requested pre-use condition requiring that works implemented to prevent private surface water from entering the highway*
- Ecology Officer – *no objection, subject to conditions and informatives*
- Conservation Officer – *no objection, identified heritage benefit of supporting continued viable use of Ivy Farm historic farmstead*
- Drainage Officer – *objection, requesting further information (see Section 4 below for details)*

3.7. Following receipt of the above consultation responses, a request for an extension of time was made to the planning case officer, to enable additional drainage information to be provided. An extension of time was not agreed to by the officer and the planning application was refused on the 5th September 2023.

3.8. The three reasons for refusal of the previous application are set out below, together with a brief summary of how the present application addresses those reasons for refusal, with further full assessment provided in the next section of this statement.

3.9. Reason for refusal 1 - *The principle of introducing a new private access driveway onto a Class A road within an Area of Outstanding Natural Beauty, in a locality where there are only very limited accesses onto this highway, runs contrary to the aims and objectives of Core Policy 2: Delivery Strategy and Core Policy 48: Supporting Rural Life of the Wiltshire Core Strategy.*

3.10. This is not agreed, as examined under the *Principle of Development* in Section 4 below.

3.11. Reason for refusal 2 - *The application would introduce light pollution, noise and motion to a site located within the Cotswold Area of Outstanding Natural Beauty (AONB). Core Policy 51: Landscape specifically references the need to protect against such intrusion and as such the proposed new private access onto the A420 would directly conflict with the aims and objectives of Core Policy 51. In addition, the application proposal would conflict with Saved Policy NE14 of the North Wiltshire Local Plan 2011 which sets a presumption against applications which would result in the loss of important trees and / or hedgerows.*

3.12. Following the refusal to grant planning permission a *Landscape and Visual Impact Assessment* (LVIA) of the scheme has been carried out by a Chartered Landscape Architect. The LVIA process has informed amended proposals including additional mitigation planting, and concludes that the Development will:

- Be well integrated, and provide for landscape succession and enhancement;
- Result in no material adverse effects to the wider landscape character of the area or the Cotswold AONB;
- Have very limited visual effects, with the proposed woodland planting providing visual benefits through reinforcement of the southern boundary;
- Not materially affect the visual amenity of the AONB enjoyed in the local or wider area.

3.13. An *Arboricultural Impact Assessment* is also provided and confirms that there is no loss of important trees or hedgerows, and the proposed new planting will result in net enhancement to the provision of woodland at the Site.

3.14. Full details of the assessment of the Development against the relevant landscape and arboricultural policy considerations are provided in Section 4 below.

3.15. Reason for refusal 3 - *Insufficient information has been provided regarding drainage of the site, in particular whether the 'dry pond' and is a 'soakaway', the lack of provision of a construction management plan regarding mitigation of groundwater pollution, and details regarding the ownership and on-going*

maintenance of the proposed drainage system, including SuDS features. As such, the application fails to comply with Core Policy 67 of the Wiltshire Core Strategy.

3.16. A *Provision for Surface Water Drainage* report prepared by BTA Structural Design Ltd sets out how the Development will ensure that surface water drainage is managed in a sustainable manner, including future management by the Owners. A draft *Construction Phase Plan* prepared by Stonewood Builders is also provided setting out how measures to avoid groundwater pollution during the construction phase of the project.

3.17. Full assessment of the drainage strategy is provided in Section 4 below.

3.18. In addressing the above reasons for refusal of the previous application, the present revised proposals are also materially different as they include additional land within the application boundary to achieve a significant additional area of new proposed woodland planting, as recommended through the LVIA process.

4. ASSESSMENT OF PROPOSED DEVELOPMENT

Introduction

4.1. The Development is assessed below against the following relevant planning policy considerations set out under the following themes:

- Principle of development
- Highways
- Design and Landscape
- Heritage
- Drainage
- Ecology
- Arboriculture

Principle of development

4.2. The Site is located outside of any settlement boundary in the countryside, although it is sited adjacent to the cluster of dwellings and businesses (including a public house, currently closed) at Giddeahall on the south side of the A420, and Ivy Farm itself forms part of a small historic settlement of dwellings and farms to the north.

4.3. Core Policy 2 *Delivery Strategy* is concerned with delivering a supply of new employment land and new homes, in a sustainable manner, and is not directly concerned with minor infrastructure projects to deliver localised enhancements to existing and established development, as proposed at Ivy Farm. This is clear from the policy wording itself and from the supporting text use of the word 'supply'. The policy seeks to direct the supply of housing and employment land to settlements in a sequential approach based upon hierarchy, and seeks general restraint from development to meet that supply in rural areas. It is explicit in the policy that there are further policy exceptions to such restraint, including Core Policy 48 *Supporting Rural Life*.

4.4. Core Policy 48 *Supporting Rural Life* is based on the objectives set out in para 6.66, which include protecting the countryside and maintaining its local distinctiveness, and supporting improved access between places and to services.

4.5. Para 6.69 goes on to set out in more detail how improving accessibility between places in the countryside may sometimes mean that development requiring planning permission is required, such as new roads, cycle routes, gates etc. and how Core Policy 48 introduces a presumption in favour of such works which can greatly benefit rural areas, where these are environmentally acceptable. Core Policy 48 then sets out how improving access, such as transport and infrastructure improvements, will be supported where the development will not be to the detriment of the local environment or local residents.

4.6. As set out in Section 2 above, there is a need for the Development proposed to address access problems associated with the existing established use of Ivy Farm, in terms of both of the private equestrian use and wider farming / land management use and associated large vehicles.

4.7. The National Planning Policy Framework (2023) ('the NPPF') sets out at para 114 how applications for development should achieve safe and suitable access for all users and para 115 goes on to confirm that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety.

4.8. Wiltshire Core Strategy Policy CP62 *Development Impacts on the Transport Network* states that developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.

4.9. In this case, there are no new uses or floorspace proposed, but rather the Development seeks to remedy existing access problems associated with an existing use and secure improved access as promoted by Core Policy 48. In doing so, the objectives of the NPPF set out above are also met as safe and suitable access for all users would be achieved where it doesn't currently exist, and the proposals will remove unsafe vehicle movements resulting in highway safety enhancement. In the consultation response by Wiltshire Council Highways to the previous application, it was confirmed that:

"The access will result in a betterment of access arrangements to Ivy Farm as the C164 is restricted in width and gradient and damage to the road surface could be attributed to grounding of long based vehicles of the sort that regularly access the proposal site."

4.10. The betterment confirmed by Wiltshire Council Highways clearly has both private and public elements of benefit. For the Applicant, access to Ivy Farm for equestrian purposes and general farming / land management purposes will be more convenient, efficient, and safer, without incurring damage to vehicles from grounding as at present, and without incurring the costs of repairing damage to the dry stone walls that are regularly struck whilst manoeuvring large vehicles near to the present entrance. There are also a range of public benefits directly associated with the principle of creating the new access, including:

- Removal of large vehicles associated with Ivy Farm from the restricted lane currently used, reducing conflict and congestion, reducing the need for unsafe reversing movements, improving pedestrian and cyclist safety, and improving journey time reliability (see *Transport Statement*);
- Avoidance of damage to the carriageway surface that currently occurs and the associated public cost of remedying;
- Avoidance of damage to the immediate environment of the restricted lane including to dry stone walls and to the narrow highway verges and locally valued hedgerows that line them;
- General amenity benefits for users of he restricted lane and those that live adjacent to it from the removal of large vehicle movements associated with Ivy Farm.

4.11. Further public benefits associated with the proposals beyond the principle function of providing an alternative access are also demonstrated elsewhere in the application including landscape and biodiversity enhancements, which weigh further in favour of the Development, as explored below.

4.12. In summary upon the principle of development, the benefits associated with the proposals result in them finding strong support – indeed a presumption of favour of such works – in Core Policy 48, and further support in the NPPF and in Core Policy 62. There is no conflict with Core Policy 2. The principle of development is therefore considered acceptable against the policies of the Development Plan and the NPPF.

Highways

4.13. The National Planning Policy Framework (2023) ('the NPPF') sets out at para 114 how applications for development should achieve safe and suitable access for all users and para 115 goes on to confirm that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety.

4.14. Wiltshire Core Strategy Policy CP62 *Development Impacts on the Transport Network* states that developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.

4.15. Pre-application discussions with officers of Wiltshire Council Highways confirmed that the proposed new access was acceptable in principle.

4.16. In responding to the previous application Wiltshire Council Highways re-affirmed that the proposals would result in 'betterment of access' and that adequate visibility would be achieved, and raised no highways objections subject to a single condition requiring details of drainage interception to prevent surface water entering the highway to be approved.

4.17. A *Transport Statement* prepared by Badingham sets out full details of the highways aspects of the scheme and includes detailed drawings of the proposed junction.

4.18. The key findings of the *Transport Statement* are summarised in section 7 of the report and confirm that that the existing historic access serving Ivy Farm is unsuited to modern requirements and the use of it by large vehicles raises a number of highway safety issues. It goes on to confirm (para 7.5-7.7) that the proposals will result in benefits to the surrounding highway network and the community, as well as providing improved access to Ivy Farm.

4.19. The *Transport Statement* concludes that the proposals will deliver upon the aspirations of Strategic Objective 6 of the Wiltshire Core Strategy by improving efficiency, avoiding the grounding of vehicles that occurs presently, removing potential congestion and delay, and improving road safety for all users. Overall, we consider the highways benefits of the proposals to be clear and convincing

and the benefits to be gained weigh heavily in favour of the Development. The proposals will improve highway safety and meet the objectives of the NPPF and Core Strategy policies in relation to highways and movement.

4.20. In response to comments made in the Case Officer's report upon the previous application in relation to highways matters, we would provide the following responses:

- *Historically farm and other large vehicle have not been prevented from accessing Ivy Farm* – The Applicant has never claimed that access with large vehicles is not possible using the existing route, but rather use of that route by large vehicles has a number of material implications upon highways convenience and safety, adverse impacts upon walls, verges and hedges adjacent to the highway, and on the general amenity of those living in and passing through the area. The proposals take a problem solving approach and seek enhancement to an existing unsatisfactory situation.

- *The gate piers and stone walling at the existing entrance could possibly be altered* – Even if this was acceptable in heritage terms at the entrance to the farm, it would not allow large vehicles to turn into the farm without undertaking a series of complex manoeuvres to around the 'triangle' to arrive at the entrance, and it would not address the wider road safety and convenience considerations for other road users associated with the use of the restricted lane from the A420 to reach the farm entrance.

Design and landscape

4.21. Core Strategy Policy CP51 (Landscape) states that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. It also states that great weight will be afforded to conserving and enhancing the special qualities of AONBs, including their landscapes and scenic beauty.

4.22. Core Strategy Policy CP57 (Ensuring High Quality Design and Space Shaping) states that proposals should make a positive contribution to the character of

Wiltshire by "enhancing local distinctiveness by responding to the value of the natural and historic environment".

4.23. Following the refusal of the previous application at the Site, which included a reason for refusal alleging that the proposals would introduce *'light pollution, noise and motion to a site located with the Cotswold AONB'* in conflict with Core Policy 51, Nicholas Pearson Associates were commissioned to undertake a Landscape and Visual Impact Assessment (LVIA) of the proposals. The findings of the LVIA guided modifications to the proposals, which are:

- Expansion of the application boundary, to include additional land to the west for extensive new native woodland planting to continue the existing linear woodland feature found to the east of the proposed new access;
- Specification of 'conservation kerbs' to the new entrance to aid visual integration of the new entrance with the receiving environment;

4.24. The LVIA submitted provides a detailed assessment of the relevant policy framework and Landscape and Visual Baseline that the proposals must be assessed against, before setting out a description of the design proposals and mitigation that has been incorporated, and then undertaking assessment of landscape and visual impacts.

4.25. The LVIA report should be referred to for detailed consideration, with a summary of the key findings provided here for planning assessment purposes.

4.26. Paragraph 8.4 sets out how the proposals comprise a carefully considered high quality design for a small scale of development that minimise tree removals, includes materials appropriate to the locality, and proposed tree planting to assist with landscape and visual integration. This reduces and minimises adverse landscape and visual effects and provides an element of landscape enhancement, as required by planning policy.

4.27. Paragraph 8.5 reports that landscape effects associated with the new driveway and associated vehicle use will result in very limited adverse effects, with proposed planting and management assisting with landscape integration and providing for landscape succession and enhancement. Further, there will be an indirect landscape beneficial effect associated with the reduction in risk to future occurrences of damage to the stone walls by vehicles. It is concluded in the LVIA

that there will be no material adverse effects to the wider landscape character of the area or Cotswold AONB.

4.28. Paragraph 8.6 reports that the visual effects of the proposals will be very limited and relate to local views from the immediately adjacent section of the A420, glimpsed oblique views seen from the local lane to the west, and from the local footpaths to the east and north-east. The proposed woodland planting and landscape management will provide visual benefits through the reinforcement of the southern boundary. In more distant views the proposed development will generally be concealed by intervening vegetation and / or built form. It is concluded that the effects on views will not materially affect the visual amenity of the AONB enjoyed in the local or wider area.

4.29. The LVIA therefore confirms that there will be no material adverse effects of the Development upon landscape character or visual amenity in the local or wider area, as a result of the carefully considered design and the mitigation included within the revised proposals. As such, the Development is considered to meet both the objectives and requirements of policies Core Policies 51 and 57 set out above.

Heritage

4.30. The Development proposed does not directly engage any designated or non-designated heritage assets.



Image: View of the Crown Inn (roof ridge and car park entrance visible) from the proposed new entrance location

4.31. The Crown Inn (Grade II listed) is located some 80 metres to the west and across the A420 of the proposed new access point. A large car parking area with a broad tarmac entrance serves the Crown Inn and is located to the east of the building. Given the distance, the presence of the A420 and pub car park, and the small scale and nature of the access junction proposed, we do not consider there to be any impacts associated with the Development on the setting of the Grade II listed The Crown Inn.

4.32. Ivy Farm House and the barn to the east of Ivy Farm House are both listed at Grade II. Whilst these buildings are remote from the Development and will not be impacted adversely in terms of setting, it must be noted that the Development will aid significantly preserving the setting of those buildings and associated structures (gates / piers / dry stone walling) by removing the need for large vehicles to access the farm via the existing constrained access, where in the past such vehicles have caused damage to these structures.

4.33. The existing historic gated access to the farm and farmhouse would remain open and unchanged and used for domestic purposes by small and mid-sized vehicles.

4.34. As noted by the Conservation Officer commenting upon the previous application (comments dated 01.09.23), the new driveway may be considered to have indirect heritage benefits in terms of supporting the continued optimum viable of use of Ivy Farm as a working historic farmstead. These identified heritage benefits, together with the avoidance of damage to the historic walls and gates, weigh in favour of the Development.

4.35. The proposals are therefore considered to comply with the statutory provisions regarding listed buildings, together with the relevant NPPF and Core Strategy policies.

Drainage

4.36. Core Strategy Policy CP67 *Flood Risk* requires that development is directed towards areas of low flood risk in line with national policy, and that all new development includes sustainable drainage measures where feasible.

4.37. The proposals have been formulated with input from a specialist drainage engineer, and incorporate sustainable drainage measures to appropriately deal with surface water runoff within the Site. A *Provision for Surface Water Drainage* report prepared by BTA is provided as part of the submission, and addresses directly the drainage queries associated with the previous application set out in the consultation response from Wiltshire Council Drainage Engineer.

4.38. The BTA report describes the surface water drainage characteristics of the Site and the results of percolation testing, and how the proposed new access has been designed within that context. A 'dry pond' will attenuate stormwater and allow it to infiltrate the surface naturally, as it does at present. As requested previously, a plan is provided showing overland exceedance flow routes for events greater than 1 in 100 yr + 40% climate change uplift.

4.39. The report demonstrates that there is no risk of surface water flooding onto the highway even in extreme conditions, and that runoff from the track will not cause flooding on the site.

4.40. Maintenance requirements to be undertaken by the Owner are set out and can be secured by planning condition.

4.41. A *Draft Construction Phase Plan* is also provided, setting out as far as is possible at this early stage how the construction process will be managed to avoid risk of groundwater pollution.

4.42. As set out in the BTA report, the proposals are considered to make adequate provision for surface water drainage within the Site to address requirements in a sustainable manner and ensure that there is no risk of additional surface water entering the public highway. The requirements of Core Policy 67 are therefore met.

Ecology

4.43. Core Strategy Policy CP50 *Biodiversity and Geodiversity* states that development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale and that all development proposals shall incorporate appropriate measures to avoid and

reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

4.44. Ecological considerations have informed the scheme development, and a *Preliminary Ecological Appraisal* by Stark Ecology is submitted setting out an assessment of the Site and Development.

4.45. The PEA confirms that the Site contains low value habitat that, and that trees and scrub to be removed to form the new access can be mitigated by replacement and additional planting as part of the landscaping for the proposals.



Image: Field boundary condition at location of proposed entrance

4.46. The dry pond will also provide a new dynamic habitat for the Site, enhancing biodiversity value. Recommendations for further habitat enhancement in the form of dormouse nest boxes and the provision of a hibernacula are set out and can be secured by planning condition.

4.47. As a result of the above-mentioned mitigation measures and enhancements, the proposals will comply with relevant local and national policy and legislation relating to ecological impacts and issues, including Core Strategy Policy CP50. This was agreed in relation to the previous scheme in the response provided by the Ecology Officer, which found the proposals to be acceptable subject to conditions.

Arboriculture

4.48. The proposals have been informed by arboricultural advice from Bosky Trees, and have been formulated in response to the tree survey findings to minimise loss of trees of value.

4.49. The Arboricultural Impact Assessment report prepared by Bosky Trees and submitted as part of this application confirms that the small number of trees to be removed are not of high value, and their removal can be compensated by planting of a significantly greater number of native trees within the Site as shown on the Proposed Site Plan.

4.50. Tree protection measures and methods to protect retained trees during construction works are set out on the Tree Protection Plan submitted.

4.51. The AIA / TPP report concludes that:

- The new access road will not impede the root protection area of any retained trees;
- Tree protection measures proposed will contain construction works;
- New tree planting will adequately compensate for trees to be removed;
- It should also be acknowledged that the Applicant has planted several acres of woodland at Ivy Farm within the past 20 years, that have greatly increased the local level of tree canopy cover;
- Overall the proposed development will have an acceptable impact on local tree cover.

4.52. Reason for refusal 2 of the previous application at the Site included the assertion that the proposal would '*conflict with Saved Policy NE14 of the North Wiltshire Local Plan 2011 which sets a presumption against applications which would result in the loss of important trees and / or hedgerows*'. This is not agreed, and is not supported by the AIA / TPP report submitted as part of this application.

4.53. Saved Policy NE14 states that permission will not be granted for proposals that would result in the loss of trees and hedges that *could be successfully and appropriately incorporated into the design of a development*. The supporting text goes on to clarify at 6.36 that the local planning authority should ensure that in granted planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees. The latter

should be substantially native tree species of local provenance. Paragraph 6.38 goes on to set out how a tree survey should be carried out to establish the quality and condition of trees potentially affected by development.

4.54. The process followed in relation to the present application follows that set out in saved policy NE14. A tree survey has informed the proposals from the outset, which have been designed seeking to avoid impacts and to only impact upon trees of limited value, the loss of which is to be compensated by significant additional native woodland planting. The trees to be lost cannot be successfully incorporated into the design of the Development. Their loss is not significant as assessed in the Bosky report and the net result at the Site of the development will be a significant enhancement through new native woodland planting to continue the existing linear woodland.

4. CONCLUSION

4.1. The proposed new access to Ivy Farm from the A420 has been formulated to meet a clearly identified series of existing access issues which result in reduced highway safety, damage to the carriageway surface and to large vehicles operated by the Applicant, and frequent minor damage to walls and verges in the immediate vicinity of the existing Ivy Farm entrance gates. It is in the interest of the Applicant and also in the public interest that these existing access issues are resolved.

4.2. The siting and design of the new access has been formulated to meet highways, ecology, arboriculture and landscape objectives, and the result is a low-key simple farm access that remains squarely within the existing parameters of the character of the surrounding area and has no material adverse landscape or visual effects, as confirmed by the LVIA submitted.

4.3. The previous application at the Site for a new access were recognised by Wiltshire Council Highways and Conservation Officers to result in clear benefits, and the proposals have been further refined to incorporate additional woodland planting that will secure both landscape and ecological enhancement.

4.4. The assessment set out above and evidenced in the submission documents that comprise the Application is that there is no harm associated with the proposals, a series of material benefits including public benefits, and strong support found for the Development in the Development Plan and NPPF policy.

4.5. The proposals represent sustainable development, compliant with the relevant Cotswold AONB guidance, the relevant policies of the Wiltshire Core Strategy and Saved Polices of the North Wiltshire Local Plan, and the relevant provisions of the NPPF and we therefore believe that planning permission can be granted to allow the Development to proceed.