

16th July 2025

Our Ref: SWLC.LPC5287

Development Services – Central
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 0RD

For the attention of Mr R Brown

Dear Mr Brown

Town and Country Act 1990
Provision of new farm access to
Gaston Farm, Gaston, Trowbridge, Wiltshire, BA14 6QA, off the B3106

As you will be aware the above matter was the subject of a pre-application enquiry (LPA reference ENQ/202401153) made in August 2024 and further to which the final comments were made in March this year.

The basis of the case for the new point of entrance is unchanged since the pre-application was made, and I have therefore largely repeated the premise as already made, and added some further photographs, which I believed my client shared with you whilst the matter was being considered, it is understood the matter is still on going and further photographs can be provided if necessary.

Gaston Farm lies to the south of the village and is accessible from Ham Green leading to The Star – a narrow thoroughfare passing to the south of St Katherine's Church.



Vehicles currently accessing the farm have to traverse along the narrow Ham Green and The Star to the north. From a highway safety perspective, the current access leading to Gaston Farm via Ham Green is a quiet narrow lane which often has

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parked cars along one side. This makes it hazardous for farm vehicles, i.e. tractors, trailers and loaders etc to pass safely and on regular occasions parked cars have needed to be towed to a safer location. There have been accidents too.

The following photographs show some of the incidents that have resulted, often closing the road for a considerable period to the inconvenience of many villagers.





The pre-app response as you will be aware supported a full application. From the two options presented the more southerly option B was considered preferable, both in terms of the potential impact on residential amenity and to avoid a more cluttered appearance at the entrance to the Conservation Area.

The enclosed application therefore seeks to formalise the support for option B. In that regard it was noted that there is an existing field entrance further south of the siting chosen, as shown in the aerial photograph extract inserted below. This access is not considered viable though to accommodate all the farm traffic movements, as it simply sits too far away from the farmyard. The desire line across the field also creates a more awkward anticipated subdivision of the fields.



Option A of course provided the most direct route over the field to the farmyard, but in response to the advice received option B is being pursued and is sited so as to take advantage of the best possible alignment and ability to access and egress both to and from the north and south, and will to all intents and purposes therefore be a simple replacement gateway, substituting for the existing which will be closed with new hedgerow planting, and which actions can of course be conditionally controlled. The impact of the development is therefore lessened by the effective 'swap' indicated.



With regard to the new access arrangement the plan extract inserted on the following page shows that it will also compensate for the loss of hedgerow by planting to the sides of the new bellmouth apron. The application details show that

there will be sufficient room to pull off the road to open and close the new timber 5 bar gates. More that one gate is proposed to allow the entrance to accommodate all farm vehicles, include HGVs, transporting livestock for instance.



The route across the field to the farmyard will be determined once the access is approved, maintaining the field's function ability. A separate agricultural Prior Approval is anticipated to facilitate most of any new hard surface that might be required but of coursed throughout much of the year (as the ground is hard) and as has happened regularly, passage across the field is unrestricted from the existing gateway.

The following google earth street scene extract shows the existing roadside hedge looking north.



Planning Assessment

The above mentioned pre-application advice clarified the relevant planning policy framework, however for the avoidance of doubt it is repeated as part of this overarching planning statement.

The Wiltshire Core Strategy (WCS) - The following Core Policies (CP) are relevant when assessing this application: CP3 (Infrastructure Requirements), CP7 (Bradford

on Avon Area Strategy), CP50 (Biodiversity and Geodiversity), CP51 (Landscape), CP52 (Green Infrastructure), CP57 (Ensuring High Quality Design and Place Shaping), CP58 (Historic Environment), CP60 (Sustainable Transport), CP61 (Transport and Development), CP62 (Development Impacts on the Transport Network), CP64 (Demand Management), CP67 (Flood Risk).

Wiltshire Local Transport Plan 2011-2026 – Car Parking Strategy

The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

The key issues arising to assess the application development are believed to be as follows:

- The principle of the development
- Green Belt
- Highways
- Landscape impact
- Heritage impact
- Ecology

Principle of Development

The location of the intended accesses lies in the open countryside in terms of planning policy, where there is a general policy of restraint. Whilst Core Policy 2 relates primarily to new housing and employment development, it does confirm that outside the defined limits of development, “Other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limited of development...” Paragraph 4.25 refers to specific instances (‘exception policies’) where development in the countryside may be acceptable, the most applicable of which is ‘Supporting rural life’ (Core Policy 48).

Core Policy 48 makes clear that ‘Protecting the countryside and maintaining its local distinctiveness’ is one of the key objectives. At paragraph 6.69 the supporting text confirms that “Improving accessibility between places within the countryside may sometimes mean that development requiring planning permission is required, such as new roads, cycle routes, gates, signposts and bus shelters. Some telecommunications works may also fall into this category. In such cases, Core Policy 48 introduces a presumption in favour of such works which can greatly benefit rural areas, where these are environmentally acceptable.”

In this case, the proposed field access will be beneficial to the village by taking away the problem of large farm vehicles from having to use the narrow Ham Green Lane to get to Gaston Farm. This will represent a significant highway safety improvement and accords with the aims and objectives of Core Policy 48. The relocation of large vehicles away from the village will result in an enhancement of the Conservation Area’s character and appearance consistent with Core Policy 58 too.

Additionally, Core Policy 34 states that development will be supported that supports sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification. Therefore, having due

regard to policies 2, 34, 48 and 58 of the WCS the proposed new access is considered to be acceptable in principle.

The pre-application advice received also concluded that subject to the detailed matters being satisfied, the principle of the development is supported.

It also noted that there is a fall-back position here in that there is an existing field access to the south of Option B, which would be stopped up. Furthermore it said that the existing field access is substandard in terms of visibility.

Green Belt

The B3106 lane running north to south to the west of the fields is located within the Green Belt (see map extract below). Consequently, the new field access would be subject to Green Belt policies.

However, this is not an application for a change of use as this would simply be a replacement agricultural access to serve the farm. Neither does the proposal involve building works (even though paragraph 154 of the NPPF allows for agricultural or forestry buildings as exceptions).



It is considered that in terms of Green Belt policy, paragraph 155 of the Framework is relevant which allows for engineering operations. The formation of this access would be an engineering operation, and therefore a form of development that is not inappropriate in the Green Belt.

The pre-application advice received made no comment on this issue and it assumed therefore that this is common ground.

Highways

As has already been pointed out, the removal of farm traffic from the narrow village lanes will improve highway safety and convenience overall. A new access into the fields from the west will enable them to be used by large vehicles without needing to enter the village or divert too far south. As also indicated above the existing access point being replaced has a substandard visibility alignment.

Achieving sufficient visibility is obviously key, as noted during the pre-application process, and the submitted plans clearly show the visibility splays to be achieved, reflecting the realistic road speeds and the fact that farm vehicles, such as tractors etc are likely to be higher, enabling a better driving position for visibility so on balance the proposed access is superior to the current arrangements.

The pre-application response quoted paragraph 116 to the NPPF, as inserted below, along with the related balanced commentary also received at the time.

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

‘... officers would take a balanced view as to how the visibility splays are to be met, especially given the fall-back position of the existing field access which has poor visibility.

In addition, removing the need to access the farm from Ham Green and The Star, narrow roads where the usual parking of cars narrow the width further, would be a benefit to highway safety. This will all be taken into consideration in the planning application’.

Landscape impact

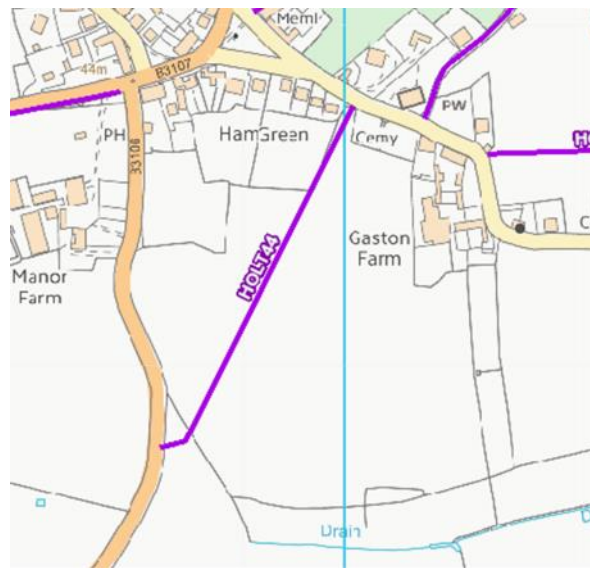
Core Policy 51 (Landscape) requires that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures.

In this case, only a simple field access is proposed, having a neutral impact as it replaces an existing gateway break in the hedge. It will also employ a traditional timber pair of five-bar gates.

The pre-application response received stated very clearly that, ‘The provision of a new access into the field would have little impact on the landscape.’ This is believed to be self-evident, especially in light of the additional planting now shown, and not previously presented at the pre-app stage.

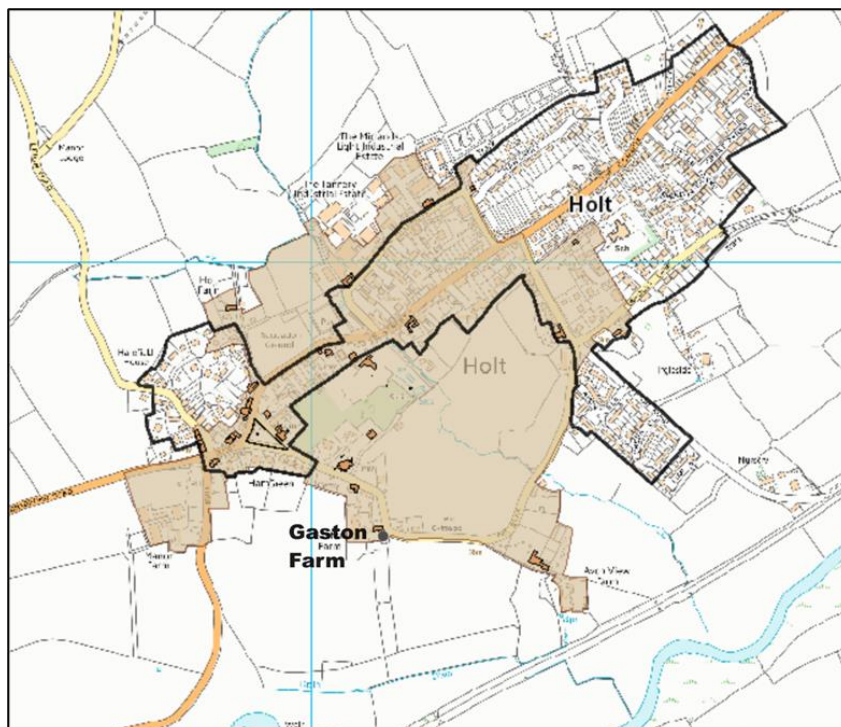
The fields incorporate a public right of way (see map provided on the following page), however, this will not be affected by the proposed access. Of course, the new

access will be visible within the landscape, but it will not be prominent and will be experienced as part and parcel of the field's established agricultural character, being entirely in keeping with the working landscape.



Heritage impact

In terms of nearby heritage assets, the Holt Conservation Area lies to the north of the proposed new field access (see shaded brown on the map provided below). Additionally, Gaston Farmhouse which is located to east of the proposed access is a Grade II Listed Building. Contextually though the degree of separation is believed to ensure that the access lies outside the setting or influence of the designated heritage assets identified.



The very modest form of development is of course also part and parcel of rural life and the established agricultural use of the land. The pre-application advice noted this point and stated, 'The appearance of the field access, at either location, would be features to be expected in an edge-of-village location such as this where agricultural uses have been the prevailing land use for centuries.

However, Option A would introduce a new access along a stretch of road that already has several accesses on the opposite side of the road in the immediate area and therefore may create a cluttered appearance at the entrance to the Conservation Area. Therefore, from this perspective Option B would be preferable'.

It was in light of this preference that the application made pursues the more southerly option, and thus accords with the support received.

Ecology

The enclosed application includes a Preliminary Ecological Appraisal and a Biodiversity Net Gain Assessment, both prepared by Luscinia Ecology. The attached reports demonstrate that the construction footprint and construction process will result in the loss of a short section of hedgerow and a small area of modified grassland. Neither of these habitats are of ecological importance and their loss will have no effect at the landscape scale. Nevertheless, an existing field access will be closed via the planting of a new mixed species native hedgerow to match the existing and the new field access will be lined with new mixed native hedgerow to complement the existing. There will be no net loss of hedgerow habitat and no change in the number of canopy breaks across the hedgerow. Broadly, the old and new gap in the hedgerow will be the same. The new hedgerows will be allowed to grow into and become part of the existing hedgerow, and the new and retained hedgerows will be managed as a single feature.

Moreover, the Biodiversity Net Gain Assessment demonstrates that a suitable enhancement can be achieved and the extra tree planting (which can be conditionally controlled) achieves the required gains but also introduces additional diffused planting along the hedge line, strengthening the landscape interest.

Conclusions

In light of the pre-application engagement undertaken I trust the above comments and associated information provide a clear application presentation, demonstrating there are no obvious reasons to seek to resist the changes proposed. However, if you have any further questions to ensure your favour decision, please do not hesitate to contact me direct.

Yours sincerely



Simon Chambers
Director

Enc.

Cc Mr R Greenman