



Kate Clements
Planning Officer
Wiltshire Council

21st January 2026,

Dear Planning Officer,

Ref: PL/2025/07191

Further to the above application, I wish to submit additional representations and to raise a formal objection on the grounds that the submission is invalid, procedurally deficient, and fundamentally contrary to the development plan and national policy.

It is apparent that the principal concerns raised by local residents have not been adequately addressed, in particular the ongoing issue of odour.

The applicant denies, somewhat erroneously, that an odour problem exists, despite numerous objections from nearby residents. As the closest neighbouring property, both my commercial premises and my home are directly affected by the persistent smell of putrefaction emanating from Knoll Farm. The severity of this issue is further exacerbated by prevailing wind direction and higher ambient temperatures.

While I acknowledge the applicant's assertion that some material is stored in frozen form, the fact remains that perishable materials are also handled on site. This includes decomposing offal and other inedible meat derived from the unwanted remains of fallen stock, as evidenced in the supporting letters from the South and West Wilts Hunt and Wilton Fallen Stock Ltd. Such material is already in an advanced state of decomposition by the time it is collected and is inherently likely to generate strong and unpleasant odours associated with rotting flesh, which have already blighted the surrounding area in recent years.

In these circumstances, it is imperative that independent expert evidence is required, specifically in the form of a comprehensive odour assessment. Such monitoring can only be meaningfully undertaken during the summer months, when odour impacts are at their most pronounced.

Even a cursory review of publicly available information demonstrates that buildings used for the storage of animal by-products are purpose-built facilities, specifically designed for that

function. While the cost of such buildings is inevitably significant, this is entirely justified given the nature of the waste involved and the critical need for facilities to be fit for purpose.

It appears that the applicant has instead opted for an improvised and makeshift conversion of a ramshackle barn originally intended for the storage of straw bales. By way of a simple example illustrating the unsuitability of the existing structure, APHA guidelines state, as a basic requirement, that such facilities must be vermin- and bird-proof. The barn in question has a vented roof and therefore plainly fails to meet this fundamental requirement.

Also, I wish to correct the applicant's unfounded assertion that the manufacture of concrete tiles generates odour. This claim is incorrect and without basis.

The applicant has submitted details of his business which seek to portray it as professional and responsibly operated. However, based on my direct experience, the applicant's actions stand in stark contrast to that portrayal. Of particular concern are the numerous discarded IBCs, some of which have been dumped upside down, littering the field directly behind the barn (see attached photograph). These containers are located immediately adjacent to drainage ditches that convey groundwater directly into the principal aquifer feeding the River Wylfe. It is presumed that these IBCs previously contained cleaning chemicals used to disinfect lorries, yet I am not aware of any measures in place on site to prevent such contaminants from entering the local watercourse.

At the recent Kilmington Parish Council meeting, I was dismayed when a supporter of the application sought to dismiss the legitimate environmental concerns raised by local residents as "lies" and "scaremongering." As the attached photograph clearly demonstrates, those concerns are well founded. I am also genuinely shocked by the apathetic response of the Environment Agency to this matter; the degree of insouciance displayed is unforgivable.

Will the removal of the bunds, as stated by the applicant, include the significant quantities of spoil from the barn excavations that were deposited on my land? This occurred in 2020 and again in 2024. In the course of these actions, the applicant caused serious damage to trees planted pursuant to earlier planning conditions: branches were broken and soil levels around the bases of the trees were altered, placing their long-term health at risk. No attempt was made to identify or confirm the boundary prior to these works, nor was any prior notification given, demonstrating a striking lack of diligence and care. Additionally, no apology was offered, nor was any remedial action undertaken to rectify the situation.

I have subsequently been forced to instruct a surveyor to formally mark the boundary. The attached photograph shows the true position of the boundary, which lies almost at the apex of the bund.

Furthermore, the applicant has confirmed that his business involves the transportation of Category 1 Animal By-Products, the highest-risk material. Following complaints raised last summer regarding odour, several containers—apparently used to store such material—were positioned in a field immediately adjacent to the garden of my residential property, where they remain to this day (see attached photographs). This raises serious concerns and calls into question whether such conduct is consistent with that of a professional waste operator acting in strict compliance with APHA guidelines.

Perhaps the most pertinent question of all, one which has not been addressed in any of the supporting documents, is how a professional, responsible, and tightly regulated company—particularly given the nature of its operations—could fail to obtain the necessary planning consents, and then continue to operate without authorisation for approximately six years.

1. Invalid Application – Failure to Meet Validation Requirements

The application form confirms that planning permission is sought for “waste management development”. Waste development falls within the definition of major development under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).

In accordance with the Council’s published Local Validation Requirements, the following assessments are mandatory for this proposal:

Landscape and Visual Appraisal (LVA)

Required because the proposal constitutes major waste development within the Cranborne Chase National Landscape.

Transport Assessment (TA)

Required for all waste management facilities.

Air Quality Assessment (AQA)

Required for all minerals and waste developments.

In addition, paragraph 8.11 of the letter submitted by Willis & Co (titled Design and Access Statement online) explicitly acknowledges that the nature of the applicant’s operations can give rise to potential odour impacts, although the applicant states they “do not consider this will be an issue”. This admission confirms that the proposal has the potential to adversely affect residential amenity. An Odour Impact Assessment (OIA) is therefore a mandatory validation requirement to properly assess and rule out such impacts.

In the absence of these assessments, the application is invalid and cannot lawfully be determined unless the Council refuses permission on the basis that the proposal fails to demonstrate compliance with relevant policies.

The grant of planning permission without these mandatory submissions would expose the Council to a clear risk of judicial review. The responsibility to comply with validation requirements rests entirely with the applicant, and the Council should not expose itself to unnecessary legal and financial risk.

2. Omission of Relevant Planning Policy Context

Although the proposal is expressly for waste management development, Chapter 3 of Willis & Co's submission makes no reference whatsoever to the Council's adopted Waste Core Strategy or the Waste Development Control Policies, both of which form part of the statutory development plan.

In the absence of any assessment against these policies, it is impossible for the applicant or their agent to claim that the proposal accords with the development plan.

3. Site-Specific Policy Objections

a) National Landscape

The site lies within the Cranborne Chase National Landscape.

Paragraph 189 of the National Planning Policy Framework (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes, which have the highest level of protection.

Paragraph 190 of the NPPF is unequivocal that major development within National Landscapes should be refused except in exceptional circumstances and where it can be demonstrated that the proposal is in the public interest. The applicant has not addressed, let alone satisfied, the required tests.

Furthermore, Section 245 of the Levelling Up and Regeneration Act 2023 introduces a statutory duty on relevant authorities to seek to further the purpose of conserving and enhancing the natural beauty of National Landscapes.

The proposed major waste management development—characterised by HGV movements, external lighting, external storage containers (including bins), and associated operational activity—fundamentally conflicts with both national policy and the Council's statutory duty.

The applicant attempts to justify the proposal by reference to former agricultural use. However, that use has been abandoned following unauthorised development, and there is no realistic prospect of the site reverting to active agricultural use. There is therefore no credible fallback position.

Paragraph 1.6 of Willis & Co's letter states that the premises would be used by third parties for unspecified light industrial uses with external storage. A National Landscape is plainly not an appropriate location for speculative, undefined commercial development.

The proposal also includes the construction of an artificial man-made bund, which is wholly incongruous with the naturally open landscape character. The need to screen the activity merely underlines its unacceptable nature.

b) Residential Amenity

While the Council's Public Protection (Environmental Health) Officer raises no objection, this position appears to have been reached without regard to the Council's mandatory validation requirements for an Air Quality Assessment and Odour Impact Assessment.

Paragraph 1.10 of Willis & Co's letter confirms that animal waste by-products are transferred between trailers. Any suggestion that this activity is "occasional" is unenforceable and should be disregarded. The Council must assume this is a regular activity and require its impacts to be properly assessed.

Paragraphs 1.9 and 2.11 of the submission refer to general storage, including storage within units other than trailers, which must reasonably be assumed to include animal waste by-products. Statements in paragraphs 8.2 and 8.11 referring to waste not being stored for "prolonged periods" and activities being carried out within a "controlled internal environment" are vague, unenforceable, and wholly inadequate.

The applicant's own acknowledgment of potential odour impacts confirms that an Odour Impact Assessment is essential.

The reliance on the definition of light industrial use is also misplaced, as it does not apply to the proposed B8 storage use, which is a significant part of the application.

The Council cannot rely on separate consenting or monitoring regimes for waste handling, as amenity impacts are a land-use planning consideration for the local planning authority.

c) Highway Safety

The proposal involves frequent movements by slow-moving HGVs. A Transport Assessment is a mandatory requirement and is essential to assess the impact on highway safety, particularly given the site's proximity to the A303.

The submitted plans also fail to demonstrate that large goods vehicles can enter and leave the site in a forward gear. Swept-path analysis must be provided to confirm that articulated lorries of up to 16.5 metres can safely manoeuvre without reversing onto the highway.

d) Water Environment

The surface water drainage proposals rely on discharge to an adjacent waterbody. While run-off volumes may not increase, the operational use of the site—including animal waste by-products, HGV parking, and industrial activity—significantly increases the risk of contamination from fuels, chemicals, and pollutants.

Contrary to paragraph 5.39 of the Flood Risk Assessment, this represents a high pollution risk.

Crucially, the site lies above a Principal Aquifer, designated by the Environment Agency as a major source of drinking water. The Environment Agency must therefore be formally consulted.

4. Conclusion

The application relies on vague, generalised, and unenforceable assertions to justify a major waste management development within a protected National Landscape, accessed from a busy road, located above a principal aquifer, and in close proximity to residential properties.

The impacts and risks associated with the proposal cannot be mitigated through planning conditions, particularly given the retrospective nature of the application. Any attempt to do so would require the use to cease until essential assessments are submitted and approved.

For the reasons set out above, the application is invalid, contrary to the development plan, and inconsistent with national policy. It is therefore respectfully submitted that the Council has no option but to refuse planning permission. Refusal would also confirm the expediency of taking enforcement action to bring this unauthorised and unacceptable use to an end.

Yours faithfully,









