

**Chairman
Marston Meysey Parish Meeting
Marston Meysey
Wiltshire
SN6 6LQ**

28 February 2026

Development Control North
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

For the Attention of Samantha Stockley

Dear Madam

Application Ref: PL/2025/09378

**Parcels of agricultural land owned by Manor Farm, Kempsford in Marston Meysey Village
Objection and Formal Request for an Article 4 Direction**

1. I refer to the online objection made by the Marston Meysey Parish Meeting (MMPM) dated 23 December 2025 (Ref: WC-25-12-359047), in which the opportunity to comment further was reserved. The application has now been amended, but as the changes do not overcome the many objections to the proposal, I set out further representations for the Council to consider.
2. The proposals give rise to an important interpretative issue associated with the availability or otherwise of Permitted Development Rights (PDRs) and this is addressed.
3. The principal objections to the scheme are set out, along with observations about potential mitigations.
4. Finally, the MMPM makes a formal and reasoned request for an Article 4 Direction to be considered by the Northern Area Planning Committee.

The Permitted Development Rights

5. The planning application as originally submitted included the entirety of the campsite proposals, although it was alleged at several points within the accompanying Planning Statement that it was only the caravan pitches that required planning permission.
6. The amendment to the planning application makes that assertion more explicit by now confining the application to land proposed to be used for the siting of up to 60 caravan pitches.
7. It is claimed that the remaining campsite on the land south and north of the road, which comprise 645 pitches and associated facilities, fall under the Permitted Development Rights (PDRs) set out under Class A of Part 4 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended (the GPDO). This is disputed.
8. Part 4 of the GPDO only allows camping for a temporary period up to 28 days, provided that it is “in connection with a festival” (see B.1 (f)).
9. The Council should note that when this amendment was introduced the concession granted to festivals did not extend to any event or outdoor gathering, which would have embraced an Air Show. One can surmise that this was to avoid harm to local amenity and well-being, but for whatever reason, this is a deliberate and important distinction.
10. The GPDO and the Town Planning legislation generally does not provide any definition for the word “festival”. The ordinary definition of the word as set out in the Oxford English Dictionary (OED) is:

“1 a day or period of celebration, typically for religious reasons.

2 an organised series of concerts, plays, or films, typically one held annually in the same place”

11. By contrast the OED definition for an Air Show is:

“a show at which aircraft perform aerial displays”

12. Whilst there may be some similarities between a campsite in connection with a Festival and an Air Show that is immaterial because there is no overlap between these definitions. This is clear from the description set out in paragraphs 1.5 and 1.6 of the Revised Planning Statement and by way of further example, the opening paragraph of

the Appendix 4 RIAT 2026 Show Camping Information. In the words of the Applicant, the Air Tattoo:

“..features around 250 aircraft, some taking part in dynamic air displays, and others open to the public in a static line up. The aircraft displays are supported by a range of ground exhibits and commercial activities, including the Techno Zone (which showcases Science, Technology, Engineering and Maths exhibits), to inspire a new generation of potential engineers.

A delegation programme invites Chiefs of Overseas Air Forces along with Programme Leads to attend the Tattoo, to network with defence and aerospace companies that participate in the event”.

13. In short, in the clear and unambiguous words of the Applicant, the campsite is proposed in connection with an Air Show and **NOT** a use that falls within the ordinary definition of a Festival. As such, the PDRs do not apply, with the requirement for an application for planning permission. The MMPM is not alone in arriving at this conclusion, although we are more explicit in setting it out.
14. The Applicant, somewhat curiously, submitted two pre-application responses received from the neighbouring authority Cotswold District Council (CDC), in relation to two other campsites proposed in their area. These responses are not formal decisions made by CDC and Wiltshire is not in any event bound by any decisions, formal or informal, made by another authority.
15. From paragraph 3.11 of the Revised Planning Statement, the question posed to CDC was “is planning permission necessary”. This of course suggests doubt in the minds of the planning consultants and the two different responses from CDC, also display interpretative difficulties with the PDRs - the response in relation to Cutler’s Field (CDC Ref: 24/02994/PAYPHH) seemingly accepting that the campsite would be in connection with a festival, but the one on Horcott Hill (CDC Ref: 24/03016/PAYPHH) seemingly taking a different view.
16. As set out above, the MMPM considers the matter to be clear and that the PDRs do not apply. Insofar as the matter is interpretative, it may ultimately be something for the Courts to decide upon, but as explained further below, the MMPM can identify an alternative and more appropriate way of addressing this, avoiding such conflict.

The Objections

17. The caravan pitches cannot realistically be separated from the proposed campsite as a whole – the distinction that the Applicant seeks to make is at best a technicality (and one that looks to be legally flawed), although at worst, a naked attempt to sidestep the checks and balances of the planning system.
18. Indeed, the interrelationship is inseparable – the wider campsite and caravans will all share the same access and circulatory arrangements, they will share some of the

shower, toilet and waste facilities, and the entertainment, drinks and food stalls will all be largely the same. Likewise, all the occupants will be subject to the same transportation, security and campsite rules and measures. In short, the campsite must be considered on a cumulative basis, because it will not be possible or realistic to distinguish many of the potential impacts and/or the necessary mitigation measures, between different types of camping and caravanning.

19. It would be perverse for the Council to consider an application for a building, but to exclude from its determination elements that might be permitted development. In similar fashion, the Council should consider the development proposed as a whole, which is for a campsite for caravans, motorhomes, campervans and tents.
20. The failure of the Applicant to undertake any Prior Consultation, much less one that was meaningful, has resulted in an unacceptable proposal that fails to reflect the sensitivities of its context. In particular, the close proximity of the Village and the nature of the single street that runs through it, which has a restriction on heavy goods vehicles.
21. The failure to properly consult with the MMPM has been compounded by the failure to undertake any Prior Consultation with the Council, reliance being placed upon the ones undertaken with CDC in relation to other sites. In short, the Applicant has evidently failed to follow the clear guidance set out at paragraph 40 onwards of the National Planning Policy Framework (NPPF).
22. Given that the Applicant commenced marketing the campsite pitches in July 2025 and sold them out before Christmas 2025, one cannot characterise the failure to properly prior consult as an oversight. Instead, the actions of the Applicant display scant regard for the planning system and those that rely upon it to protect local amenity and well-being.
23. The Village has a population of just over 100, with 200 in the Parish as a whole. Assuming an average of three occupants per pitch, the campsite could easily host 2,200 people or more that will dwarf the Village.
24. The proposed use of the field to the south of the road is of especial concern and the inaccurate claim in the Original Planning Statement that it has been used historically as part of the Green Car Park eroded trust within the Village.
25. Discussions, post submission of the application have been conducted against what amounts to a *fait accompli*. It is noted that the Proposed Site 3 Detailed Plan and the RIAT26 Show Camping Information show/refer to a 50-metre buffer strip and security fence. That said, this is not shown on Site 3 Plan – Proposed Camping Area and in any event is insufficient (which partly reflects the fettered position of the Applicant having prematurely sold all the pitches). Whilst it is acknowledged that the buffer zone would be some improvement, it is also now outside the application area, so is not therefore something that can be controlled through this application as submitted. This small

change partially indicated is not therefore sufficient to overcome the significant objections against the proposal.

26. The Council will see from the many representations lodged the main objections to the proposals. In the interests of brevity, the MMPM adopts those, only expanding or adding to them as follows under sub-headings.

Detrimental effects on Local Amenity and Well – Being

27. The sheer scale of the campsite, along with the proposed entertainment will clearly result in detrimental effects on local amenity and the well -being of the Village, through noise, disturbance and concerns about privacy and security. This will especially be the case at the northern end of the Village, particularly to the occupants of Greenleaze, who immediately abut the southern field.
28. In the past, the evenings have generally been a welcome lull and respite from the considerable noise of the aircraft that is endured by the Village for the week leading up to and including the Air Show and a day or two afterwards. This break in noise is important to all residents, especially those with small children and other vulnerable groups, and those who work from home. This vital recovery time will potentially be lost or seriously diminished by the presence of a large campsite with entertainment facilities in such close proximity.
29. In addition, the proposal raises significant traffic issues. Although the Revised Planning Statement refers to an extract of an agreed RIAT Event Traffic Management Plan 2026 at Appendix 4, this has not been included.
30. However, as explained to the MMPM, the arrangements for the Park and Ride facility at South Cerney, will entail the use of double decker buses being sent down south through the Village, with up to 70 buses running through in the morning and evening. The Village Street, which has restrictions on large vehicles, is not suitable for such vehicles, especially at such high volume and has the potential to conflict with school runs and residents commuting to and from work. This will also harm local amenity and well-being.
31. In addition, as highlighted at paragraph 6.30 onwards of the Revised Planning Statement, there will be the traffic linked to the campsite itself, which will be a combination of towed caravans, motorhomes, campervans and cars, some possibly with trailers, and these will be numbered in their hundreds. Many of these will arrive at times when the one – way system is not in place, with the real risk that they will drive through the Village. It is also naïve to assume that all vehicles will arrive in an orderly and spaced manner with the further potential for vehicles to stop along the Street, all of which will create noise and disturbance and be a safety hazard.

32. Whilst there will be evident and unacceptable impacts during the Air Show itself, there will be other unacceptable impacts leading up to and afterwards during the setting up and setting down period.
33. A campsite of the scale proposed will evidently take some time to set up, with vehicle movements and noise associated with erecting the various physical facilities being provided. With a population of a small town, one can, for example, anticipate the need for bowzers to bring in water for the showers and to remove wastewater.
34. Likewise, the setting down time is likely to be extended, particularly with the large volumes of waste involved – from human and food waste, general litter and no doubt abandoned tents and other detritus.
35. The duration of these impacts will therefore extend for several weeks and effectively blight the quiet enjoyment of many local residents for a significant part of the summer, when people would otherwise be able to enjoy their gardens, relax indoors with open windows or enjoy walks along the roads and paths through and near the Village. As proposed in the application, this disruption would recur annually.
36. In summary, the proposed campsite will result in the impacts on local amenity and the well - being of the Village associated with the Air Show being pushed well beyond acceptable limits.
37. In so doing, the proposed campsite would be contrary to the Wiltshire Core Strategy as adopted in 2015 and in particular Core Policy 39 on Tourist Development. Criteria iii clearly requires that the scale and use of any proposal should not be detrimental to the amenities of residential areas. The campsite, which is proposed for a temporary and recurring period in perpetuity is clearly not in accordance with this policy.
38. The likely impacts are also contrary to the Vision set out in the saved parts of the North Wiltshire Local Plan, as adopted in 2011. At 1.1 this seeks to protect existing amenities and enhance the quality of life of residents. The denigration that will result from the campsite flies in the face of this adopted Vision, which is echoed at paragraph 13.1 of the Reasoned Justification for Policy TM1, the General Policy for Tourism.
39. The replacement Wiltshire Local Plan, as submitted in November 2023, is now at a relatively advanced stage towards adoption. Core Policy 39 on Tourist Development contains up to date and particularly relevant guidance. This indicates:

“Proposals for camping and touring caravan sites (including extensions) will be supported where they can be accommodated without adverse impact on the character and appearance of the landscape and meet criteria iii to v above.

Criteria iii states (with our underlining):

The scale, design and use of the proposal is compatible with its wider landscape setting and would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas.”

40. Given that almost any camping or caravan site will be seasonal in its use, this policy clearly applies to one that will recur annually during July.
41. In summary, the proposed campsite will cause demonstrable harm to local amenities and the well – being of the residents. As such, it will not be in accordance with the adopted and emerging planning policy framework. The caravan aspect is inseparable from the whole and so the application should be refused.

Potential Mitigations

42. It is at least encouraging that the Applicant recognises the potential impacts associated with the Proposals and so implicitly acknowledges the likely harm to local amenity and well-being and the unacceptable extent of such harm. Paragraph 6.24 of the Revised Planning Statement outlines the policies and procedures required to cover “a plethora of issues”, including:

- “• Alcohol Management Plan;
- Command, Control, Communications and Co-ordination Plan;
- Emergency Planning;
- Fire Safety Management;
- Medical and Welfare Plan;
- Noise Management;
- Security and Stewarding Operational Plan;
- Ticket and Entry Policy;
- Traffic Management Plan;
- Waste Management Plan;
- Water Supply Plan; and
- Public Safety Management Plan.”

43. Without prejudice to the view that the proposals are unacceptable, it would be essential that if planning permission is granted despite the objections to the proposals that the required mitigation measures are baked into such consent. This is because they are necessary, relevant to planning, relevant to the development, can be couched with precision and are reasonably required in all other respects.

44. However, there could be difficulties in realistically enforcing any planning conditions (the last of the six key requirements of a condition) attached to a temporary use. Given also the fact that some mitigation measures will be off site and/or require the co-operation and agreement of third parties, there is a requirement for a Planning Agreement or a Unilateral Undertaking under Section 106 of the Town and Country Planning Act 1990, as amended.
45. This is important also, because any planning permission granted, despite the strongly held objections, would run with the land and not be personal to the Applicant. In addition, the extent and scale of measures required are such that their proper implementation cannot be left simply to the goodwill of the Applicant. Even if the Applicant is considered a responsible party, circumstances, such as financial pressures, management regimes and outsourcing decisions, can change over time. As matters currently stand, the following factors suggest the Applicant cannot be relied upon to operate responsibly within the planning system, e.g.:
- The failure to properly consult with the Council and MPPM prior to the application being submitted
 - The advertising the campsite four months before submitting an application, with the pitches sold out about the same time the application was made
 - The inaccurate or at least uncertain claim that much of the campsite is permitted development
 - The original and inaccurate claim that the southern field has historically been used for parking during the Air Show
 - The failure to properly manage the traffic queues that build up from very early morning with some cars filled with rowdy occupants
 - The failure to properly clean up the Green Car Park after the 2025 event in a timely fashion
 - The failure to control traffic through Marston Meysey over many years
 - The apparently pointless nature of the Residents Badges, which have no evident management scheme that has any obvious purpose or benefit
 - The failure to properly manage traffic flows at the traffic lights on the C124 leading to and from the A419, with local residents left waiting for prolonged periods whilst trying to get to work and take children to school
46. The campsite in its entirety will therefore need to be managed through enforceable controls. In addition, or as part of the above matters specified by the Applicant, other matters to be included should be as follows under sub-headings.

Duration

47. This should not extend to 28 days but to a lesser period to cover the Air Show and shoulder days either side. Paragraph 4.7 of the Revised Planning Statement suggest this could be confined to 11 days, but MMPM accepts that 14 days would provide some reasonable flexibility.

Site Layout and Activities

48. The requirement to undertake meaningful consultation with MMPM on the proposed site layout, facilities and activities, should they vary in any material way from year to year.

Site Management, Security and Contact Details

49. The requirement to undertake meaningful consultation with MMPM and to agree with the Council the Site Management and Security measures and provide contact details and the rota for duty managers and staff.

Traffic Management

50. The requirement to undertake meaningful consultation with MMPM as they affect Marston Meysey and to agree with the Council the Traffic Management proposals and provide contact details and the rota for duty managers and staff.
51. This should include measures for restricting traffic accessing the village and how to control parking along the Street. This is especially important, bearing in mind the concerns about the campsite traffic itself.
52. If a consequence of replacing the Green Car Park with a park and ride facility is large numbers of double decker buses running through the Village that would not be acceptable.
53. Significant daily vehicular movements linked to emptying out the large volumes of sewage and other waste generated, along with water bowzers and the servicing/replenishing the food trucks etc. also has the potential for causing major traffic issues.
54. Acceptable measures to guide these aspects therefore require the input of MMPM.

Other Measures to Protect Amenity

55. There are a range of other measures required to protect amenity, e.g.:
- Security fencing

- Noise restrictions, e.g. limits on hours for any entertainment, bars and food trucks etc.
- Limits on the use and type of generators by those providing facilities and campers
- Measures to minimise light pollution
- Restrictions on fires and the use of BBQs
- Restrictions on pets
- Litter patrols including along the Street
- Timed arrival and departure times for campers to minimise nighttime disruption
- Condition photographs of play area, which although locked, a requirement to make good any damage caused during the Airshow
- Condition photographs of road, verges and pavements with a requirement to make good any damage caused because of the Airshow

Set up and Set Down

56. The MMPM to be notified of when works will commence for setting up the campsite and contact details for on-site managers and key staff to be provided.
57. Clearing up and dismantling of the campsite to commence immediately after the last day of camping. Contact details for on-site managers and key staff to be provided.
58. The MMPM to be notified of any heavy or unusual vehicle movements during the set up and down periods.
59. Penalty measures for non-compliance, e.g. £1,000 index linked fine payable to the Council for each day of delay, without good reason.
60. For the avoidance of doubt, there should also be a requirement to implement any plans agreed.

The Need for an Article 4 Direction

61. The Council will be familiar with the procedures under which the PDRs can be withdrawn via a Direction under Article 4 of the GPDO.
62. Paragraph 54 of the NNPF advises that such action should be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area. It goes on to advise that in all cases, such action should be based on robust evidence and apply to the smallest geographical area possible.

63. As highlighted above, the Applicant recognises what it terms the “plethora of issues” that are raised by the proposed campsite and the range of mitigation measures necessary to address those. In other words, it acknowledges the potential harm to local amenity and well – being. To that extent, it is helpful that this is undisputed. Importantly also, it provides the clear and robust evidence required to justify an Article 4 Direction. The objections made to the application, including those set out herein and the conflict with adopted and emerging planning policy all add weight to this robust justification.
64. The difference between the Applicant and the MMPM, in support of many local residents, is where the planning balance should lie. The Applicant believes the proposals along with the mitigation measures to be acceptable, whereas the Village largely believe they are not.
65. If the Council agrees with MMPM that the campsite is unacceptable, then an Article 4 Direction is clearly required to remove the PDRs as allowed under Class B.1 (f) of Part 4 of Schedule 2 to the GPDO. Otherwise, and unless seriously challenged by the Council, the Applicant has signalled the clear intention to proceed regardless under these provisions and very obviously, one can assume, convert the 60 caravan pitches to camping ones. An Article 4 Direction therefore provides a speedy route for the Council without having to address the interpretative issue surrounding the definition of “festival” highlighted above.
66. If alternatively, the Council does grant planning permission for the caravans, an Article 4 Direction is still required to ensure the rest of the campsite can be permitted subject to the planning conditions/agreement/unilateral undertaking so clearly necessary. This justification is essentially the same as that used by the Council in the attached report dated 22 March 2018 in relation to land in Potterne (see paragraphs 9.5 and 9.6 in particular). The MMPM clearly expects consistency in the decision making of the Council.
67. In addition, such a Direction is required to cover the whole of the south field to clarify the boundaries and prevent the campsite from expanding without any planning control. For the avoidance of doubt, the areas the limited geographical area to be covered is shown in the attached plan.
68. The MMPM therefore makes a formal request to the Council for a Direction under Article 4 of the GPDO to withdraw the right to use the land defined in the attached plan for camping in connection with a festival use for a period up to 28 days in calendar year as otherwise allowed under Class B.1 of Part 4 of the GPDO.

Summary and Conclusions

69. In summary, it is not accepted that the wider campsite is permitted development, because, in the words of the Applicant, it is in connection with an Air Show and not a Festival.

70. The exclusion of the wider campsite from the application is therefore based upon an inaccurate or at least uncertain interpretation of the law.
71. In any event, the caravan pitches and campsite are inseparable and will cause an unacceptable level of harm to local amenity and well-being, through issues associated with noise, disturbance, loss of privacy, security concerns and unacceptable traffic flows through the village.
72. As such, the development proposed is not in accordance with the specific policies relating to Tourism or their reasoned justifications set out in the saved parts of the North Wiltshire Local Plan, the Wiltshire Core Strategy and the emerging Replacement Wiltshire Local Plan.
73. The application should be refused accordingly, but in addition and for the avoidance of doubt, the Council should also make an Article 4 Direction withdrawing the Permitted Development Rights the Applicant alleges (wrongly in our view) are available to it. This is necessary to safeguard local amenity and well-being, consistent with the NPPF.
74. If the Council is minded to approve the application, despite the serious objections to it, there is still a clear and justifiable need to make an Article 4 Direction to ensure the campsite can be properly managed and controlled by enforceable conditions and/or a planning agreement/unilateral undertaking.
75. I trust these representations will be taken into full and proper account, but if you have any queries, or require any amplification, please do not hesitate to contact me.

Yours sincerely

Anthony Hester

Anthony Hester
Chairman
Marston Meysey Parish Meeting