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YEARS



Campaign to Protect
Rural England
Wiltshire

16 April 2026

For the attention of Planning Officer: David Millinship

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Planning Reference: PL/2026/01724 (Variation of condition 2 relating to PL/2021/04663)

Site: Poulton Mill, Poulton Hill, Marlborough, SN8 2LN

OBJECTION: Application for Variation of Condition 2 – Retrospective Regularisation of Equine Building

Dear Mr. Millinship

CPRE Wiltshire maintains its serious objections to the development at Poulton Mill. Having reviewed the submission for **PL/2026/01724**, we wish to record our strongest possible objection to what is, in effect, a retrospective attempt to regularise significant and unauthorized departures from the original consent.

It is a matter of significant concern that this application is framed as a "minor" variation. The development as built represents a flagrant departure from the approved plans under **PL/2021/04663** ("the 2024 decision"). The scale of these changes is material and cannot be reasonably classified as "minor" under Section 73.

Our objections are based on the following material planning considerations:

1. Omissions and Piecemeal Development

We note that while this application seeks to "correct" the Barn, it fails to address unauthorized changes to the stable built form, including ridge line design changes and additional translucent panels. Furthermore, there are no details regarding the construction compound, parking, or welfare facilities. This suggests a piecemeal approach to planning compliance that should not be supported.

We wish to draw to the Case Officer's attention to the fundamental basis upon which the original permission (**PL/2021/04663**) ("the 2024 permission") was granted. **Condition 19** explicitly states: The commercial use hereby permitted shall only be as an Equestrian Orthopaedic Clinic use (a sui generis use)

We would suggest that by designating the use as *sui generis*, the Council's intention, we believe, was done to protect the **North Wessex Downs AONB** and the setting of the **Scheduled Ancient Monument** (the Dam of King's Fishponds). Any proposed variations to the building's interior or roof (such as the increase in translucent panels) must be strictly scrutinized against this *sui generis* use. If the changes facilitate a more general

commercial intensity rather than the specific orthopaedic clinical use intended, this will go to undermining the very logic of Condition 19.

2. Highways and Transport Evidence

The Transport and Highways information submitted on **7 October 2021** on which the 2024 permission was made, is no longer fit for purpose and cannot be relied upon to assess the current impact of this proposal. The 2021 data was predicated on the site operating strictly as an Equine Orthopaedic Clinic, a specialised use which the Case Officer previously noted did not offer emergency medicine, 24-hour callouts, or out-of-hours operations.

The applicant now explicitly states that the business is an Equine Veterinary Clinic which has seen "steady growth" since **2003** (our emphasis). This constitutes a material change in the intensity of the site's use. A generalised veterinary clinic could inherently generate different traffic patterns—including emergency arrivals and high-frequency movements—than an orthopaedic clinic. Consequently, the 2021 assessment is outdated; we submit that a new Transport Assessment is required to reflect the current business model and the actual volume of traffic movements now being generated.

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Noise & Light Pollution from Vehicles and activities neighbouring a Domestic Housing and Wildlife Corridor - Moreover, we believe there should be limitations placed on the working times that the transport and work activities can take place.

3. Material Change in Scale and Character

- **Increased Footprint:** The enclosed floor area has increased from 971m² to 1245m²—a **28% increase** in scale.
- **Incongruous Materials:** The shift away from approved materials (including the loss of Cedar cladding) and the change in wood orientation results in a building that is visually harsher and more dominant within the North Wessex Downs landscape.
- **Procedural Threshold:** We contest that a 28% increase in area and a 265% increase in glazing meet the threshold for a "Minor Material Amendment". This should have required a full new planning application.

4. Excessive Light Pollution and "Dark Skies" Impact

- **Glazing Increase:** The applicant has increased the number of translucent roof lights by approximately **260%** (from 20 to 72).
- **The "Lantern Effect":** This massive increase in glazing, combined with the currently open sides, creates a significant "lantern effect" that is wholly inappropriate for this rural landscape.
- **Lack of Evidence:** No light spillage calculations have been provided to assess the impact on the identified "Wildlife Corridor" or neighbouring residential privacy.
- **Cumulative Impact:** Combined with existing ménage floodlighting, this development undermines local "Dark Skies" policies and disrupts nocturnal wildlife.

5. Environmental Risks to the River Og and Statutory Compliance

CPRE Wiltshire has major concerns regarding the inadequate detail surrounding waste management and drainage, particularly given the site's sensitive location.

- **Nitrate Vulnerable Zone (NVZ) Compliance:** The postcode for the site falls within the River Kennet catchment area. Under the current Environment Agency and Defra designations 2025 - 2028, the entire region remains a designated NVZ. The current submission lacks the technical detail necessary to demonstrate compliance.
- **Pollution and Nutrient Loading:** There is a critical lack of detail regarding the proposed "Manure Container" and its ability to prevent the leaching of equine effluent, faeces, and urine into the River Og.

Such leaching poses a significant nitrogen and phosphate threat to the river ecosystem and the nearby River Kennett SSSI.

- **Clinical and Veterinary Waste:** The Planning Statement now identifies the site as an "equine veterinary clinic". This introduces a new risk profile involving prescribed drugs and medical waste. The application fails to provide a robust management plan for the disposal of such materials to ensure the protection of the River Og and the amenities of nearby residents, in accordance with **Core Policies 50 and 57** of the Wiltshire Core Strategy and the **NPPF**.
- **Logistical Inconsistencies:** While two stabling areas exist, only one manure storage area is identified (drawing 17128.107-C). The absence of storage details for the "existing stables"—the furthest point from the proposed barn—is of great concern, especially given that the previous midden was located adjacent to the river.
- We question whether Flood Risk Assessment or Drainage Strategy of this the actual constructed additional features, such as the 28% increase in impermeable surface area, so close to the River Og, has been accounted for?

6. The Planning Balance: Harm vs. Public Benefit

In the planning balance, any "irreversible damage" to the local environment and the site's character must be outweighed by significant public or economic benefits. The applicant has failed to provide any data regarding an **increase in** employment or specific economic gains resulting from this expansion.

Without evidence of job creation or a demonstrated contribution to the local economy, the "trade-off" is heavily weighted toward environmental harm. Paragraphs 88 & 89 of the NPPF (National Planning Policy Framework) supports a prosperous rural economy, but this must be balanced against the protection of the landscape. In this instance, the loss of environmental integrity is not countered by any stated socio-economic gain, rendering the proposal an unsustainable development.

Conclusion

The applicant has demonstrated a clear disregard for the planning process by constructing a building that vastly exceeds approved parameters. To approve this variation would set a dangerous precedent that developers may build beyond their permissions and expect retrospective "regularisation" as a formality.

CPRE Wiltshire urges the Council to refuse this application and take appropriate enforcement action to ensure the building is corrected to the original approved design under **PL/2021/04663**.

Yours sincerely

Anne Henshaw

Cc

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