



PLANNING OBJECTION

Objection to PL/2026/04461

Land at Church Lane
Limpley Stoke
Wiltshire

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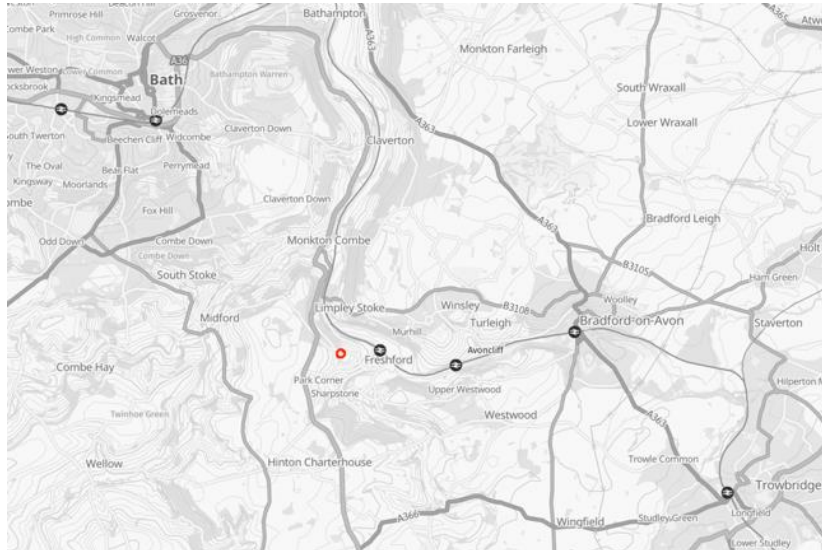
Objection to PL/2026/04461

1. Introduction

- 1.1 This statement has been prepared in order to formally object to the proposal outlined in application PL/2026/04461 in its current form. This application proposes the erection of 3 No. polytunnels, a packing shed and a welfare/tool shed and associated access and landscaping.
- 1.2 This objection is submitted on behalf of the residents of Knowle House, which is located immediately adjacent to the application site to the southeast.
- 1.3 The application was valid on 16th July 2026 with consultations to be received by 27th August 2026.
- 1.4 We would like to make clear that our clients are not against the principle of the community project and absolutely recognise its benefits. For the planning reasons outlined in this report, however, this site is not a suitable location for the proposal. Specifically, given the location of the site within the Cotswold National Landscape and adjacent to the Grade II* listed church, the site is of the highest visual sensitivity and, in our opinion, the proposed benefits of the proposal do not outweigh the adverse impacts of the scheme.

2. Site and surroundings

2.1 The site is located to the southeast of Bath but is within Wiltshire for planning purposes.



Source: Magic Maps

2.2 The LPA boundary is as shown below.



2.3 The site is located between Limpley Stoke and Freshford.



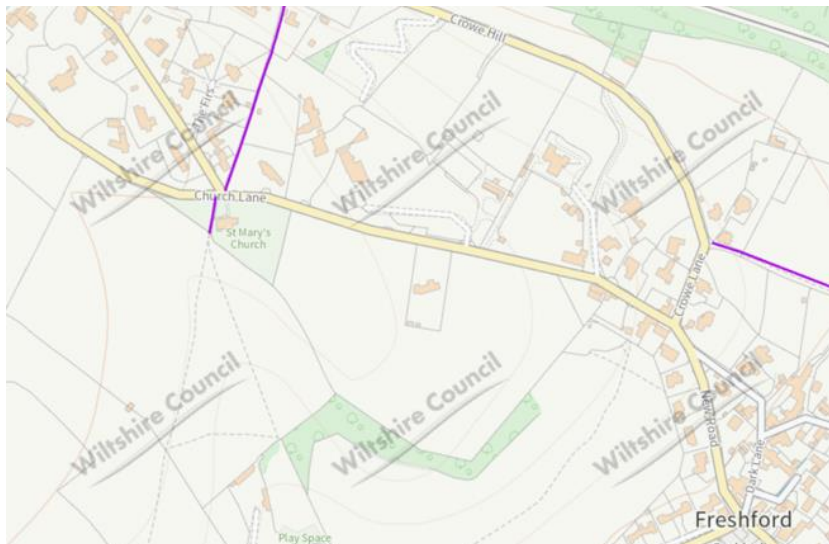
Source: Magic Maps

- 2.4 The site is within the West Wiltshire Green Belt where planning policy seeks to protect openness. New development is very strictly controlled and only allowed in exceptional circumstances. This may include support for new agricultural buildings.
- 2.5 The site is also within the Cotswolds National Landscape where protecting landscape character is given great weight in the planning balance.
- 2.6 The Church of St Mary to the northwest of the site is Grade II* listed. This means that heritage impact is a material planning consideration and any harm to the setting of the listed building must be avoided.



Source: Historic England

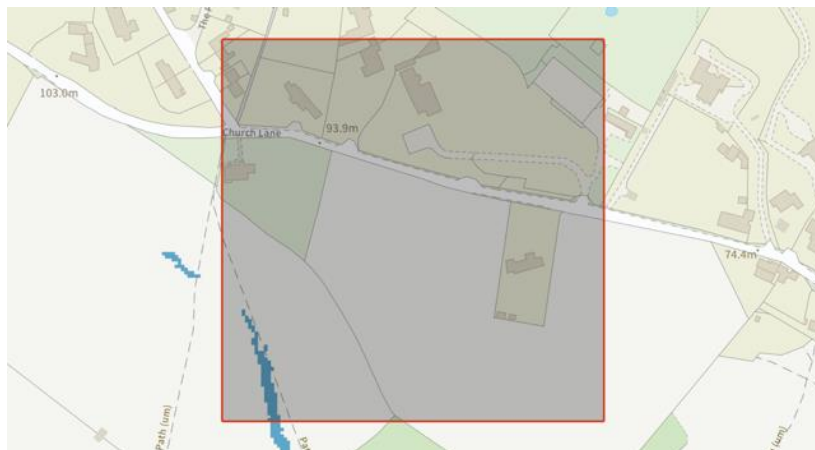
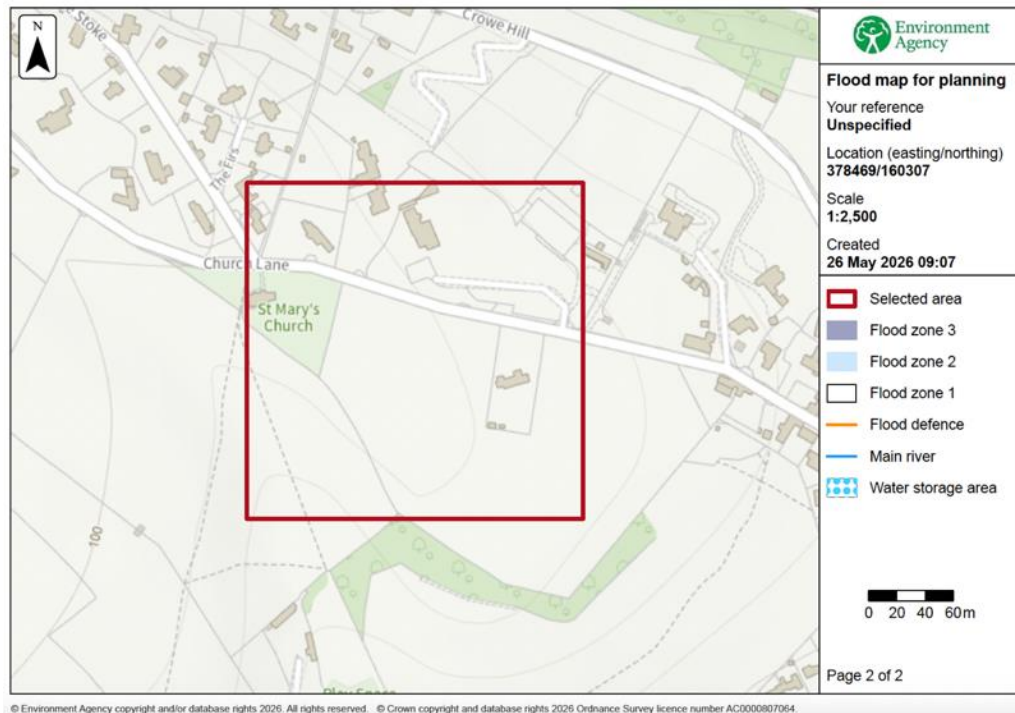
- 2.7 Much of Freshford is within a Conservation Area, but the site is not within a Conservation Area.
- 2.8 There are a number of Public Rights of Way in the area, but none that traverse the site.



Source: Wiltshire Interactive Planning Map



2.9 The site is within Flood Zone 1 where there is a very low probability of flooding and where there is no restriction on development on flooding grounds. The site is not at risk from surface water flooding.



3. Relevant planning policy

National Planning Policy Framework 2026

Wiltshire Core Strategy

Core Policy 1 Settlement Strategy;

Core Policy 2 Delivery Strategy;

Core Policy 7 Spatial Strategy for the Bradford on Avon Community Area

Core Policy 48 Supporting Rural Life

Core Policy 50 Biodiversity and Geodiversity;

Core Policy 51 Landscape

Core Policy 57 Ensuring High Quality Design and Place Shaping;

Core Policy 58 Ensuring the Conservation of the Historic Environment;

Core Policy 60 Sustainable Transport;

Core Policy 61 Transport & Development;

Core Policy 62 Development Impacts on the Transport Network;

Core Policy 64 Demand Management

Other material considerations

National Planning Practice Guidance

Freshford and Limpley Stoke Neighbourhood Plan 2014 to 2039. Made November 2015

4. Planning history

4.1 There is no recorded planning history for the site.

4.2 Pre-Application Advice was sought in relation to this proposal reference ENQ/2026/00256. The officer summarised:

- ‘The scheme for a Community Farm is potentially acceptable in principle, however the development including creation of a new vehicular access would impact on the National Landscape and setting of a Grade II* listed building and these impacts weigh significantly against the acceptability in principle and social benefits which are identified and acknowledged. The determination of any formal application will therefore be assessed on the planning balance and will be dependent on the resolution of all technical objections with the benefit of full surveys/reports where appropriate. This response identifies the key issues which need to be addressed in the submission of a planning application which may enable the proposal to be supported on balance having regard to any external consultation responses and public consultation received in response to such an application.’

4.3 The Pre-Application Response highlighted that the following issues need to be addressed in any application:

- Principle – in relation to proposed use
- Green Belt
- Heritage impact
- Landscape impact
- Design/character and appearance of the area
- Amenity
- Highway safety

- Ecology and Biodiversity

5. Planning matters of objection

5.1 The primary reasons for objecting to the proposal at this stage are as follows:

- Location plan
- Principle - proposed use
- Green Belt
- Heritage Impact
- Landscape Impact
- Amenity
- Biodiversity

5.2 It is clear that the advice given by the LPA at the Pre-Application stage has largely not been followed. In particular, further information on the proposed use of the site is not included in the application. The Planning Statement simply states that 'The proposed horticultural use does not constitute a material change of use of the agricultural land. Any occasional community use or activity on the site will be ancillary to the horticultural use of the site.' This does not accord with the details set out in the submitted Business Plan.

6. Preliminary Matter

6.1 The site is located on the boundary with Bath and North East Somerset LPA however the list of neighbours and consultees published under the application on Wiltshire Council's website does not include the neighbouring authority who should be a consultee on the application.

7. Location Plan

- 7.1 The location plan (ref: 370_GLA_00_00_DR_L_1004 Rev P2) submitted with the application includes a red line boundary that is contrived and inaccurate. The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires a location plan to outline the exact application site and all land necessary to carry out the development.
- 7.2 While it is understood that the current location plan includes the areas of proposed operational development, it does not include all the land necessary to carry out the development. Specifically, the tree protection plan includes areas of protective fencing that fall outside of the red boundary line, including trees which are in the ownership of our client. The land outside of the current red line has not been outlined in blue as the applicant does not currently own the land therefore the tree protection plan could not be secured via condition as an approved plan should permission be granted.
- 7.3 We also consider the entire site should be included within the red line given the proposed community and educational uses and the ambiguities surrounding this. The inclusion of the whole site would mean it exceeds 1ha and should therefore be dealt with as a major application. This matter is dealt with in more detail in the next section.

8. Proposed use

- 8.1 The application seeks permission solely for the proposed operational development as the existing use of the field is agricultural. While this is acknowledged, the submission lacks detail on the extent of the community and educational uses that would take place on the site.

- 8.2 The submitted Planning, Design and Access Statement (PDAS) states that the community and educational uses will be ancillary to the wider agricultural use of the site however we contend the nature of the use of the site falls in Class F2 such that a change of use should also form part of the application.
- 8.3 Firstly, the access plan (drawing number 2601 PR100) appears to include reference to one of the bed areas falling outside the application site as 'Educational' whereas the two adjacent are referred to as 'No dig bed'.
- 8.4 While the PDAS is light on detail of the community and educational uses, the submitted Business Plan provides specific information on these uses which would appear to extend well beyond ancillary and instead form a fundamental part of the use of the site.
- 8.5 The opening summary of the Business Plan describes the proposed use as a community farm where a fully employed grower will be supported by volunteer members of the community. It describes community involvement and engagement as being vital to the farm and that local pre-schools and schools are keen to be involved with the site creating an inclusive and welcoming space for the whole community to meet, grow, learn and enjoy producing food.
- 8.6 It is further noted that a Community Benefit Society (CBS) was formed specifically to secure the land for the benefit of the community who will be able to become members of the farm.
- 8.7 The Business Plan goes on to include a key indicator of the success of the farm being 'Community vitality: high levels of local participation through events, regular volunteer sessions, and integrated school and pre-school visits'. Furthermore, one of the stated objectives of the CBS is to 'Provide Education by offering joyful

opportunities to bring the community and visitors together to build knowledge and skills around healthy food, farming, biodiversity and climate resilience’.

8.8 It is not necessary to reproduce every aspect of the Business Plan again, rather it is intended to demonstrate that it is clear, as a matter of fact and degree, that the proposed use of the site extends well beyond a typical agricultural use. Members of the community will be coming and going from the site in a manner that is reflective of a primary community use, not ancillary use.

8.9 It is not debated that agricultural activities will take place on the site, however it is considered that the cumulative level of community involvement outlined above means a fundamental F2 use of the site is proposed which would not be ancillary to the agricultural use.

9. Green Belt

9.1 The site is located in the Green Belt and the PDAS contends that the development is not inappropriate due to the exception for agricultural buildings outlined in GB7 1. (a) of the newly published NPPF.

9.2 We have already outlined why we do not consider the use of the site to be solely agricultural therefore it is for the LPA to determine whether the development complies with this exception.

9.3 Beyond this, however, the proposal fails to consider the impact on the openness of the Green Belt and the purposes of including land within it.

9.4 The site lies in one of the last remaining undeveloped parcels of land which separates Limpley Stoke and Freshford. Indeed, the settlements have begun to coalesce through development which has taken place on the north side of Church Lane and the land surrounding our clients’ dwelling is the only gap which exists

between the two settlements along this road. It is therefore clear that the development contradicts one of the purposes of Green Belt outlined in Paragraph GB6 2 of the NPPF which is to prevent neighbouring towns merging into one another.

- 9.5 In respect of impacts to openness, the proposal will develop a prominent, edge of settlement greenfield site where there will evidently be harm to the openness of the Green Belt. It is up to the LPA to decide the extent of this but, in our view, the proposal does not comply with national Green Belt policy.

10. Heritage Impact

- 10.1 The Heritage Statement and Impact Assessment (HSIA) submitted with the application does not adequately assess the heritage impacts of the proposal and underestimates the level of harm to the setting of St Mary's Church and the associated listed monuments.
- 10.2 An application for a proposal of this nature in such close proximity to a Grade II* listed heritage asset should be accompanied by a Statement of Heritage Significance. Historic England's guidance on Statements of Heritage Significance can be found here: <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/heag279-statements-heritage-significance/>
- 10.3 The Heritage Statement submitted does not properly evaluate either the significance of the site or the impact of the scheme.
- 10.4 The HSIA correctly identifies the high level of significance of the heritage assets and the contribution the setting makes, including views into and out of the site and the hedgerow along Church Lane, but does not fully consider the significance and sensitivity of the site.

- 10.5 The existing and proposed images 5a and 5b shown on page 7 of the HSIA clearly demonstrate the harm to the setting of the church whereby the proposal will almost entirely change views from the church and will add modern, alien features in the landscape through the prominent siting of the polytunnels.
- 10.6 Conversely, images 6a and 6b significantly underestimate the impact of the removed hedgerow for the site access. The full extent of the access has been diminished in the photo and does not show how the ongoing maintenance of the visibility splays would impact of the appearance of the hedgerow which has been identified by the LPA as being of significance in the setting of the church.
- 10.7 The HSIA, on page 13, states that the new access will be a public benefit by creating a safe place to pass on Church Lane as well as providing safe access to the site. However, there are already numerous vehicle passing places in close proximity to the proposed site access and it is a highways requirement, not a public benefit, to provide safe access to a site.
- 10.8 The proposal's approach to mitigating heritage harm is through planting along the boundary with the church as well as some planting to replace the hedgerow removed for the access however the affect of this planting will be to further enclose the church and remove the uninterrupted and ranging views into and out of the church site such that the mitigation is also harmful to the setting of the church and listed monuments.
- 10.9 It is acknowledged there is naturally some public benefit associated with the proposal and this is not disputed however we contend that the harm to the setting of the church and associated monuments is on the medium-high end of less than substantial which adds further weight against the scheme which the LPA will need to carefully consider against the public benefits and in the overall planning balance.

10.10 We have consulted archaeologist and heritage specialist Cllr. Dr Andrew Tizzard PhD MCIfA on the proposal and his professional view is as follows:

- 'For a site as sensitive as Freshford, the Heritage Statement (HS) should have been informed by full consultation of the Wiltshire and Swindon Historic Environment Record (HER). There is no clear evidence within the submitted documentation that such consultation has taken place. Furthermore, given the significance of the site and the potential impacts upon designated heritage assets, it would be reasonable to expect the Heritage Statement to have been prepared by a Full Member (MCIfA) of the Chartered Institute for Archaeologists and to have adopted a more robust assessment methodology.

The principal heritage consideration should be the impact of the proposal upon the setting and significance of the Grade II* Church of St Mary. The church is of Saxon origin, dating from the 10th century, with substantial 13th to 15th century additions. Its churchyard also contains three Grade II listed monuments. While the submitted Heritage Statement acknowledges views from the church looking east-south-east across the field proposed for development, the assessment is limited in scope and does not adequately examine the wider contribution that these views make to the significance of the heritage asset.

In particular, the assessment should have considered longer-distance views from the surrounding landscape, including views looking west towards Freshford and the church. The visual relationship between the church, its churchyard and the undeveloped land to its south-east forms an important component of its setting and significance. The church occupies a notably elevated, exposed and isolated position between the settlements of

Freshford and Limpley Stoke, a characteristic that materially contributes to its historic and evidential value. This aspect of the asset's significance does not appear to have been fully recognised or properly assessed within the submitted Heritage Statement.

The methodology employed by the Heritage Statement is also insufficiently transparent. It should have clearly set out the assessment criteria, policy framework and guidance documents used to evaluate significance, setting and potential impacts. At a minimum, the assessment should have referenced the following:

Heritage Assessment Criteria, Planning Policy Guidance and National Planning Policy Framework

The assessment of significance should be undertaken using criteria derived from the Design Manual for Roads and Bridges (DMRB) LA 106: Cultural Heritage Assessment (formerly HA 208/07, HA 60/92 and HA 75/01). The magnitude of impact should similarly be assessed using the qualitative criteria established within the DMRB methodology.

The assessment should also have regard to relevant Historic England guidance, including:

- a. Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment (Historic England, 2015);
- b. The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition, Historic England, 2017);
- c. Understanding Place: Historic Area Assessments, Principles and Practice (Historic England, 2017); and

d. Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England Advice Note 12, 2019).

Relevant local planning policies should also be considered. Depending upon the local planning authority, this should include policies relating to the conservation of the historic environment and the protection of heritage assets and their settings.

In addition, the assessment should demonstrate compliance with the National Planning Policy Framework (NPPF), particularly Chapter 20, which addresses the conservation and enhancement of the historic environment. The NPPF requires decision-makers to identify and assess the significance of heritage assets affected by a proposal, including any contribution made by their setting. Where harm is identified, this must be clearly articulated and weighed against any public benefits arising from the scheme.

Whilst the NPPF recognises that the setting of a heritage asset is not fixed and may evolve over time, the historic landscape context of St Mary's Church has remained substantially intact. Consequently, the contribution made by the surrounding undeveloped land to the significance of the church should be regarded as a key consideration in the assessment of heritage impact.

Overall, the submitted Heritage Statement appears to understate both the sensitivity of the site and the contribution made by the application field to the significance and setting of the Grade II* Church of St Mary. A more comprehensive assessment would be required to properly understand and evaluate the likely heritage impacts of the proposed development.'

11. Landscape impact

- 11.1 Notwithstanding whether the application should be dealt with as a major application, we contend that there are significant harms to the Cotswolds National Landscape (CNL) associated with the proposal.
- 11.2 The site occupies a prominent position in the landscape with a sloping topography that amplifies views of the site from the wider area. Given the high degree of visual sensitivity of the site in terms of location and nature, this application should be accompanied by a Landscape and Visual Impact Assessment as the proposal has the potential to impact the character of the area and local views. The required methodology and guidance for LVIA's can be found on the Landscape Institute's website.
- 11.3 The application is accompanied only by a Landscape and Visual Appraisal which is only usually acceptable for less impactful proposals. The Landscape and Visual Appraisal correctly identifies that there are a number of mid-range views of the site from as far as 2km away however there is no subsequent detailed assessment of the impacts of the development as would be expected in a full Landscape and Visual Impact Assessment therefore the submission is deficient. The PDAS states an LVIA has been submitted however there is no such document available on the Council's website.
- 11.4 The development will evidently be visually prominent in the wider landscape and there will be key harms from the construction of the buildings, polytunnels and removal of the hedgerow for vehicular access. The application proposes some planting which is stated to mitigate these harms however given the size and prominence of the site, the planting will not sufficiently mitigate the landscape harm.

11.5 For these reasons, the proposal fundamentally conflicts with the following management objectives of the LCA 10B: Avon Limestone Valley:

Counteract the impact of degraded urban edges with new woodland planting that links to existing woodland of the valley slopes.

Retain the distinctive character of the villages by restricting development that encroaches the valley sides. Ensure any change respects the traditional stone built character and vernacular form.

Conserve and restore traditional hedgerow boundaries.

Conserve the distinctive rural and dispersed settlement pattern and the network of rural roads and sunken lanes that connect them.

11.6 Clearly the proposal conflicts with a number of these objectives. Namely:

- Significantly harms the rural setting of the church.
- Introduces non-vernacular structures.
- Removes 30 metres of hedgerow along the roadside – 10 metres either side to be replanted or translocated behind the visibility splays. This is a significant alteration to the traditional hedgerow boundary.
- Harms the distinctive character of the villages by reducing the green gap between Freshford and Limpley Stoke.

11.7 N4 of the NPPF is clear in that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes. The Levelling Up and Regeneration Act 2023 also introduced amended the duty on LPAs to 'seek to further' the statutory purposes of National Landscapes.

- 11.8 In this respect, alongside the lack of an LVIA, the application makes no consideration of the aims and objectives of the Cotswolds National Landscape Management Plan 2025-2030.
- 11.9 Of most relevance, criterion 1 of Policy CE1: Landscape sets out that ‘Proposals that have the potential to impact on, or create change in, the landscape of the Cotswolds National Landscape (CNL), should be delivered in a way that is compatible with and seek to further the conservation and enhancement of the landscape character of the location, as described by the CNL Board’s Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment.’
- 11.10 Criterion 2 goes on to state ‘Proposals that have the potential to impact on, or create change in, the landscape of the CNL, should seek to further the conservation and enhancement of the scenic quality of the location and its setting, views, including those into and out of the National Landscape and visual amenity.’
- 11.11 It is not clear how the proposal complies with these two criteria and more widely, it is not clear how the proposal conserves and enhances the special qualities and scenic beauty of the CNL.
- 11.12 It is our view that the proposal conflicts with Chapter 19 of the NPPF, with Local Plan Policies 51 and 57 in this regard and with the Cotswold National Landscape Management Plan.

12. Amenity

- 12.1 There are a number of dwellings to surrounding the site including our clients’ house which is nearest the site. The Pre-Application Advice given by the LPA

suggested that any impacts on residential amenity be addressed, but this has not been adequately done. The LPA's comments and recommendations were as follows:

- 'Policy CP57 also includes a requirement that development should ensure a high standard of amenity for existing and future occupants (point vii). This includes safeguarding privacy, outlook, natural light, and protection from noise, disturbance, and overbearing effects.

The site has one neighbouring property adjacent to the boundary. It is noted that car parking is located closest to the boundary and this could be a cause for concern in terms of outside activity, noise and headlights from vehicle movements. The scale of the buildings is not shown and therefore it is not possible to conclude on matters of overlooking and overshadowing, however the buildings appear to be sufficiently distanced to avoid significant effects. The land use, whilst predominantly unchanged from agriculture, would appear to be materially different in terms of its operation to a commercial farming enterprise, involving significantly more visitors/volunteers including educational groups than would be expected on a typical arable farm and the proposal also includes 'events' and use of the land for activities which would be a diversification from simply cultivating produce. Post-construction, the use of large-scale machinery would, conversely, likely be reduced given how the beds are laid out. Consideration will need to be given to the use of the proposed buildings and types of events and potential for disturbance not associated with the current use of land for hay production.'

12.2 Further details have not been supplied beyond the assertion in the Planning Statement that:

- 'The design and siting of the proposed new buildings, polytunnels and areas of hard standing have been carefully considered in respect of preserving the amenity and privacy of the nearest residential dwellings by locating these elements of the proposal on the northern boundary of the site whilst also maintaining a buffer between the nearest dwelling on the eastern boundary of the site.

As noted above, there will be no external lighting. Site working hours and activities will be relatively benign with no heavy agricultural machinery being used. On this basis, the proposal will preserve the amenity of near neighbours and is considered to be compliant with WCS Policy 57.'

12.3 This portrayal is misleading and incorrect. Given the proximity of the parking and turning area to Knowle House, vehicle movements and the increased activity on the site are likely to impact residents' enjoyment of the dwelling. The proposal will lead to noise from cars arriving and leaving; car door opening and closing; headlights shining into windows.

12.4 The change in the use of the site may also impact residents to the north and this has not been considered.

12.5 As such, we do not consider that the proposal complies with Local Plan policy 57.

13. Biodiversity

13.1 The impact of the removal of such a long stretch of hedgerow (up to 30 metres) is significant in ecological terms. Hedgerow is considered to be Priority Habitat and the precise details of how this aspect of the proposal is to be handled have not been submitted.

13.2 Furthermore, the risk of impacts to Dormouse habitat through the removal of this amount of hedgerow would be significant. As no Dormouse surveys have been

carried out, it is not possible to make assumptions about their presence/absence and a precautionary approach in this instance is not considered appropriate.

14. Conclusion

- 14.1 For the reasons set out above, there are significant harms identified to the Green Belt, Cotswolds National Landscape, designated heritage assets, amenity and biodiversity which heavily outweigh the benefits from the proposal. There are also procedural errors relating to the contrived location plan and the extent to which the development involves a material change of use to a Class F2 community use.
- 14.2 The proposal in its current form conflicts with Chapters 3, 7, 12, 13, 14, 15, 19 and 20 and with Wiltshire's Core Policies 1, 50, 51, 57 and 58.
- 14.3 It is not considered that these matters can be adequately addressed through further information or amendments therefore planning permission should be refused.