

FORMAL PLANNING REPRESENTATION

TO: Development Management, Wiltshire Council

FROM: Stephen Neel, Langleys Farm, Charlton SN16 9DR

SUBJECT: Formal Representations to Four Interconnected Planning Applications on Land Adjacent to Heath Cottage, Moor Lane, Garsdon (The "Development Site"):

Application Ref	Application Component	Proposal Description
PL/2026/05313	Application 1	Erection of Equine Barn (adjoining Agricultural Barn) & Dung Heap
PL/2026/05311	Application 2	Creation of New Vehicular Field Access & Visibility Splay
PL/2026/05309	Application 3	Construction of Access Track & Agricultural Barn (9.1m x 13.7m)
PL/2025/09717	Application 4	Change of Use of Land to Agricultural / Private Equestrian Use

1. Executive Summary & Basis of Objection

We are writing as the freehold owners of Langleys Farm, situated immediately to the north-east of the proposed development, and owners of the agricultural field adjoining the northern site boundary.

While we are not opposed in principle to appropriate, well-designed rural development, we object to the current proposals across all four planning submissions (PL/2026/05313, PL/2026/05311 PL/2026/05309 and PL/2025/09717) on the following grounds:

1. Procedural Flaws & Failure of Statutory Consultation
2. Artificial Fragmentation of Site ("Salami-Slicing") & BNG Evasion
3. Excessive Size, Scale, Height, and Visual Impact
4. Flawed Drainage Strategy & Unproven Discharge to Private Land
5. Unsuitable SuDS Classification & Inadequate Pollution Control
6. Severe Contamination Risk from Manure Heap Placement in a Groundwater Source Protection Zone (SPZ2c)
7. Light Pollution & Loss of Rural Character

2. Procedural Flaws & Lack of Statutory Consultation

Neither myself nor my wife were notified or formally consulted by Wiltshire Council regarding any of the four planning applications, despite being immediate boundary neighbours to the north and north-east.

- **Breach of Consultation Requirements:** This omission fails to satisfy Wiltshire Council's Statement of Community Involvement (SCI) and the statutory requirements set out under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).
- **Prejudice to Immediate Neighbours:** As the most directly affected landholding—sharing a physical boundary and a drainage ditch—the lack of direct notification has prejudiced our ability to review the extensive technical documentation across four fragmented submissions.

3. Artificial Site Fragmentation ("Salami-Slicing") and Biodiversity Net Gain (BNG)

The submission of four separate, contemporaneous planning applications across a single, contiguous landholding with replicated supporting technical reports and plans represents an artificial fragmentation of development, commonly termed "salami-slicing."

Application Element	Single Combined Scheme	4 Fragmented Applications
Site Area / Scale	Major Development Threshold (≥ 0.5 ha)	Minor Development (Per Application)
Biodiversity Net Gain (BNG)	Mandatory 10% BNG Metric Applies	Fragmented Exemption / Low Thresholds Claimed
Infrastructure Impact	Holistic Masterplanning Assessment	Piece-meal Evaluation

Key Policy Conflicts:

- **Biodiversity Net Gain (Environment Act 2021 & NPPF):** By splitting the site into four smaller parcels, the applicant appears to be artificially keeping site areas or unit counts below key development thresholds to avoid triggering full statutory BNG requirements and comprehensive off-site/on-site mitigation metrics. When evaluated holistically, the combined site constitutes a major development scheme that must deliver a verified minimum 10% BNG using the statutory metric.
- **Comprehensive Planning Principles:** The National Planning Policy Framework (NPPF) requires local planning authorities to assess the cumulative impact of development. Replicating identical reports across four submissions confuses the public record and obscures the true environmental and infrastructure impacts. Wiltshire Council must evaluate these applications as a single, combined development entity.

4. Size, Scale, Height, and Visual Impact on Langleys Farm

The height, overall massing, and footprint of the proposed buildings across two of the four applications are disproportionate to the surrounding rural countryside and inappropriate in relation to Langleys Farm.

- **Visual Amenity & Impact:** Langleys Farm sits at a lower and exposed elevation north-east of the site. Due to the proposed building heights, the development will be prominently visible from our principal living areas, private amenity spaces, and surrounding farmland. The combined massing and 5.24m ridge height create a dominant structure when viewed from Langleys Farm. This directly conflicts with Wiltshire Core Policy 57 (vii), which requires new development to protect the amenity of existing occupants from overshadowing and visual intrusion.
- **Unjustified Scale and Contradictory Proposals:** The applicant's Change of Use submission (Application 4) explicitly states the land is intended to graze "2/3 horses" for private leisure. However, the parallel applications propose a block of 4 stables alongside a large-scale agricultural barn. This is a contradiction. Development in the open countryside is strictly controlled and buildings must be proven to be *reasonably necessary* for their intended use. Proposing four stables for a maximum of three horses represents unjustified overdevelopment. It introduces unnecessary built massing into the rural landscape and raises severe concerns about the future intensification of the site into commercial use.

- **Landscape Character:** The massing conflicts with Core Policy 51 (Landscape) of the Wiltshire Core Strategy, which requires development to protect, conserve, and enhance the landscape character and not harm visual amenity or rural views.
- **Requested Mitigation:** Should consent be granted despite these objections, the Council must request an immediate reduction in the ridge heights, overall building scale, and footprint across all parcels. The British Horse Society (BHS) welfare standards and standard UK planning practice advise of a minimum internal clear headroom / eaves height of 2.7m to 3.0m for stables. Joining the stables (PL/2026/05309) and agricultural barn (PL/2026/05311) at a uniform 4.0m eaves height artificially inflates the bulk of the equestrian section.

5. Defective Drainage Strategy & Unauthorised Discharge

The proposed Drainage Strategy (Issue 2) contains critical technical deficiencies regarding surface water disposal:

Unproven Watercourse Linkage & Discharge onto Private Property

- **Discharge Location:** The drainage plans show surface water runoff being directed and discharged into the boundary ditch situated within our field to the north, which also affects the environment along Public Footpath CHAR5.
- **Existing Waterlogging:** This area of our field is already subject to severe seasonal waterlogging and possesses very poor infiltration capacity. Adding concentrated surface water attenuation runoff will exacerbate flooding on our agricultural land.
- **Lack of Downstream Connectivity:** The applicant has not demonstrated that this ditch connects to a legally defined, continuous downstream watercourse. Discharging surface water into an internal, non-flowing field ditch on private land without a verified outfall or downstream easement is unsound and legally unviable under the SuDS hierarchy and CIRIA C753 guidelines.

Incorrect SuDS Surface Classification & Defective Treatment Train

- **Flawed Baseline Classification:** Section 4.4 of the applicant's Drainage Strategy classifies the proposed hardstanding and vehicle areas as "non-residential car parking with infrequent change (e.g. schools, offices)", assigning a "Low" pollution hazard level.
- **Misrepresentation of Operational Usage:** This classification treats the site like a lightly used employee car park. In reality, this is an operational agricultural and equestrian holding accommodating farm machinery, tractors, horseboxes, livestock transport, and manure storage. Under CIRIA C753 (The SuDS Manual) Table 26.2, these surfaces must be categorised as "Commercial yards / delivery areas / agricultural vehicle access" (Medium Hazard) or "Farmyards / manure handling areas" (High Hazard).
- **Inadequate Mitigation & Missing Treatment Stages:** By artificially downgrading the site to a "Low" hazard rating, the applicant relies on a single permeable stone sub-base layer as the sole method of water quality treatment. Under the correct Medium/High Hazard rating, CIRIA C753 mandates a multi-stage SuDS treatment train (such as permeable paving combined with oil/silt separators, swales, or filter strips) to capture heavy metals, sediment, and any hydrocarbons before discharge.
- **Direct Pollution Threat to Our Land:** Applying an under-calculated treatment rating results in inadequately filtered runoff being discharged directly into the boundary ditch in our private field,

creating a severe and avoidable risk of hydrocarbon, heavy metal, and silt contamination to our agricultural land.

6. Severe Contamination Risk from Manure Heap Placement

A fundamental flaw in the proposed site layout is the placement of an active manure heap directly over proposed permeable paving/surfaces.

- **Leachate Infiltration Mechanism:** Permeable paving is designed specifically to allow surface water to filter directly into the sub-base and underlying ground. Placing a manure heap on permeable paving creates an immediate pollution conduit. Rainfall will wash highly concentrated organic leachate, nitrates, ammonia, and bacterial pathogens (e.g., *E. coli*) directly into the permeable sub-grade.
- **Environmental Health & Statutory Violations:** Section 2.1 of the applicant's Drainage Strategy confirms the site lies within a Groundwater Source Protection Zone (SPZ2c). Placing an active manure heap over permeable paving within an SPZ2c zone represents a critical environmental threat, breaching Environment Agency Groundwater Protection Position Statements (GP3) and the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018 (Farming Rules for Water). It presents an unacceptable threat of contaminating local protected groundwater aquifers and the adjoining northern field ditch.

7. External Lighting Impact

The applications lack a comprehensive, site-wide Ecological and Residential Lighting Strategy.

- **Residential Amenity:** Uncontrolled external lighting across the application sites will result in significant light spill, glare, and sky glow towards Langleys Farm, disrupting the peaceful, dark-sky environment characteristic of this rural location, conflicting with Core Policy 57 (vii).

8. Necessary Planning Conditions (If Minded to Approve)

If Wiltshire Council is minded to grant planning permission for these applications, we formally request that the following planning conditions be attached to any consent:

1. **Landscape Screening Buffer (Copse Planting):** Prior to the commencement of development, a detailed landscaping scheme shall be submitted and approved in writing by the LPA, specifying the planting of a dense, multi-layered copse/belt of native broadleaf trees and understorey shrubs along the northern and north-eastern site boundaries to fully screen the development from Langleys Farm. Space must be left to allow a tractor and hedge cutter to pass between the proposed copse and the existing hedge to allow for hedge cutting. (We have discussed this with the applicant who is supportive of this condition.)
2. **Reduction in Height, Scale, and Massing:** Revised elevation drawings demonstrating a reduction in building scale, specifically capping internal clear headroom / eaves height for the equestrian barn at 2.7m–3.0m in line with BHS welfare standards, and adopting a lower-profile roof for the agricultural store to minimise landscape massing.
3. **Re-design and Overhaul of Drainage Strategy:** Prohibition of any surface water discharge into the northern boundary ditch until a comprehensive hydrological survey proves a continuous,

legal downstream outfall. The SuDS calculations must be re-run using the correct Medium/High vehicular land-use classification.

4. **Relocation of Manure Storage & Impermeable Pad Requirement:** Absolute prohibition of manure storage on permeable surfaces. All manure storage must be relocated to a dedicated, fully bunded, impermeable concrete pad with sealed foul leachate collection, located away from SuDS features and site boundaries.
5. **External Lighting Limits (Dark Skies Compliance):** Submission of a Lighting Management Plan specifying low-lux, downward-directed, PIR-motion-sensored luminaires with 0% upward light spill, operating below 2700K color temperature to protect bat corridors and neighbour amenity.
6. **Comprehensive BNG Delivery:** A site-wide Biodiversity Net Gain Management Plan demonstrating a minimum 10% measurable net gain across the combined four application areas using the statutory metric.

9. Conclusion

We respectfully request that Wiltshire Council refuse these planning applications in their current form, or require a comprehensive, single-scheme resubmission that addresses these fundamental planning, environmental, and drainage failures.

Yours faithfully,

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