

Preshute Parish Council response to Manton Grain store, Downs Lane, Manton Down, Wiltshire: Consultation- PL/2024/01824

Summary

Preshute Parish Council objects to this application:

1. It does not conform to National Planning Policy as it is a large development that will be visible in the landscape from across large areas of Fyfield Down and will not 'conserve and enhance' the National Landscape.
2. There are no exceptional circumstances that would support such a development within a National Landscape.
3. The proposed access is totally inadequate;
 - a. Downs Lane is a single carriageway and cannot support large articulated grain lorries
 - b. Downs Lane is used by walkers, cyclists and horse riders. Introducing large lorries into the mix will put the safety of people at risk as well as preventing their enjoyment.
 - c. The byway from Downs Lane to the proposed site is a non-metalled track that could not support large lorries without significant improvement, (which is not mentioned in the application.)
4. The volume of traffic to fill / empty the grain store would necessitate a high number of journeys that the local infrastructure cannot support.
 - a. To empty a full store would require over 80 large articulated lorry journeys.
5. The capacity of the grain store is significantly larger than the grain produced by the existing, local acreage of CP farming. Lorries could bring grain from other sites, putting additional pressure on the local access road and the already congested roads of Marlborough.
6. The proposed grain store is outside the curtilage of any existing farm building.
7. The application is incomplete as it fails to provide, for example, a traffic impact statement or identify where services will come from.
8. As this application is incomplete it is likely there will be further planning applications to cover, for example, fencing, lighting.
9. Lighting and grain drying, although not mentioned, will be needed and these will further degrade the National Landscape through light and noise pollution.
10. A precedent has been set to prevent lorries using Downs Lane; this was a condition of the award of planning permission for the existing grain store (see map, figure 2).

Fails to meet National Planning Policy

The application site is within a designated National Landscape.

The National Policy states

'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes which have the highest status or protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations, and scale and extent of development should be limited'

The NPPF also states that

'When considering applications for development within national Landscapes permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the application is in the public interest.'

The Large-scale development of an industrial type building in open countryside designated as a National Landscape which would prejudice the lawful use of a well-used statutory bridleway is clearly not in the public interest and would cause significant harm to the integrity of the National Landscape, reduce public enjoyment of the special landscape

and cause danger and hazard to users of Downs Lane and residents of the lane whose amenity would be severely adversely affected.

Objections to the application as presented

Inadequate access

Downs Lane is a single-track road with passing places. The track PRES 12, is an unmade track.



No new or improved or altered access is proposed in the application for pedestrians or vehicles - they will simply use Downs Lane as it is and the track as it is.

The proposed grain store can hold 2,400 tonnes of grain. The land that is owned locally by CP Farming is insufficient to fill the grain store and therefore it is likely lorries will bring grain in from farms out of the Marlborough area. It will take over 80 large lorries to transport the grain from the grain store.

Downs Lane is a narrow road from A4 to Manton equestrian estate, and to the car park at the top of Downs Lane. Downs Lane is also a statutory bridleway and well used by walkers, cyclists and horse riders. There is only just enough road width for two small cars to pass provided that any walkers and horse-riders move onto the verges. All cyclists have to dismount.

A large grain lorry would fill the entire width of the lane. There would be no room for anyone else to use the lane if a grain lorry were on the lane. If two grain lorries were on the lane at the same time one would have to reverse all the way back to the car park area. It would be unsafe to reverse onto the A4.

Neither Downs Lane or the track PRES 12 are adequate to support this volume and weight of traffic.

Poor mitigation

The tree survey confirms that the largest tree on the site and the only group of trees on the site would be removed. The tree survey proposes mitigation in the form of new trees and hedgerows. The Ecology report also proposes mitigation in the form of new trees, shrubs and hedgerows. The landscape Report also proposes new trees and shrubs etc .

However, the application does not propose any new trees or planting. In fact, the development site precludes any new planting because the proposed building is so big.

Key aspects of concern not covered in the application

The Application does not specify:

- We note also the dryer is gas fired and dries using fans and there is no statement on eco-friendliness, noise or emissions.

- Any boundary fencing or heights or materials.
- Where electricity would come from.
- Where water would come from.
- How foul sewage would be disposed of.
- What or where external lights would be or where security lights would be.
- Whether there will be any restriction on hours of operation.
- No explanation about usage or frequency of use

Major Omissions

There is:

- No access statement.
- No Traffic impact statement and no confirmation of how many lorries per day would use it, how many at peak times, the size of the lorries and any unloading machinery.
- No planning statement explaining planning policies.
- No Environmental assessment.

Future Planning Applications needed?

We are not convinced the existing planning application, if granted, would be sufficient to operate the facility. There are likely to be further planning applications eg for security fences, lighting, vehicle storage, weighbridge etc.

Precedent for the use of Downs Lane for lorries

We understand when planning permission was granted for the grain store south of Manton House Farm, identified on the map in figure 2, a condition was made that any lorry accessing the grain store would access from Frees Avenue, the Marlborough – Rockley road. Lorry access via Downs Lane was prohibited.

Grain store in the landscape

The grain store will be visible from large areas to the west and south west of the grain store site. This includes Devils Den and the open space across large parts of Fyfield Down.

The following map indicates where we believe the grain store will be visible. The two photographs show views with the grain store superimposed into the landscape.

The size of the grain store in the landscape was calculated by using the heights of the gate posts and haystack as guides and also the height of the ash tree referenced in the planning application. That said, the position of the grain store and the superimposed images are approximate and may be in error.

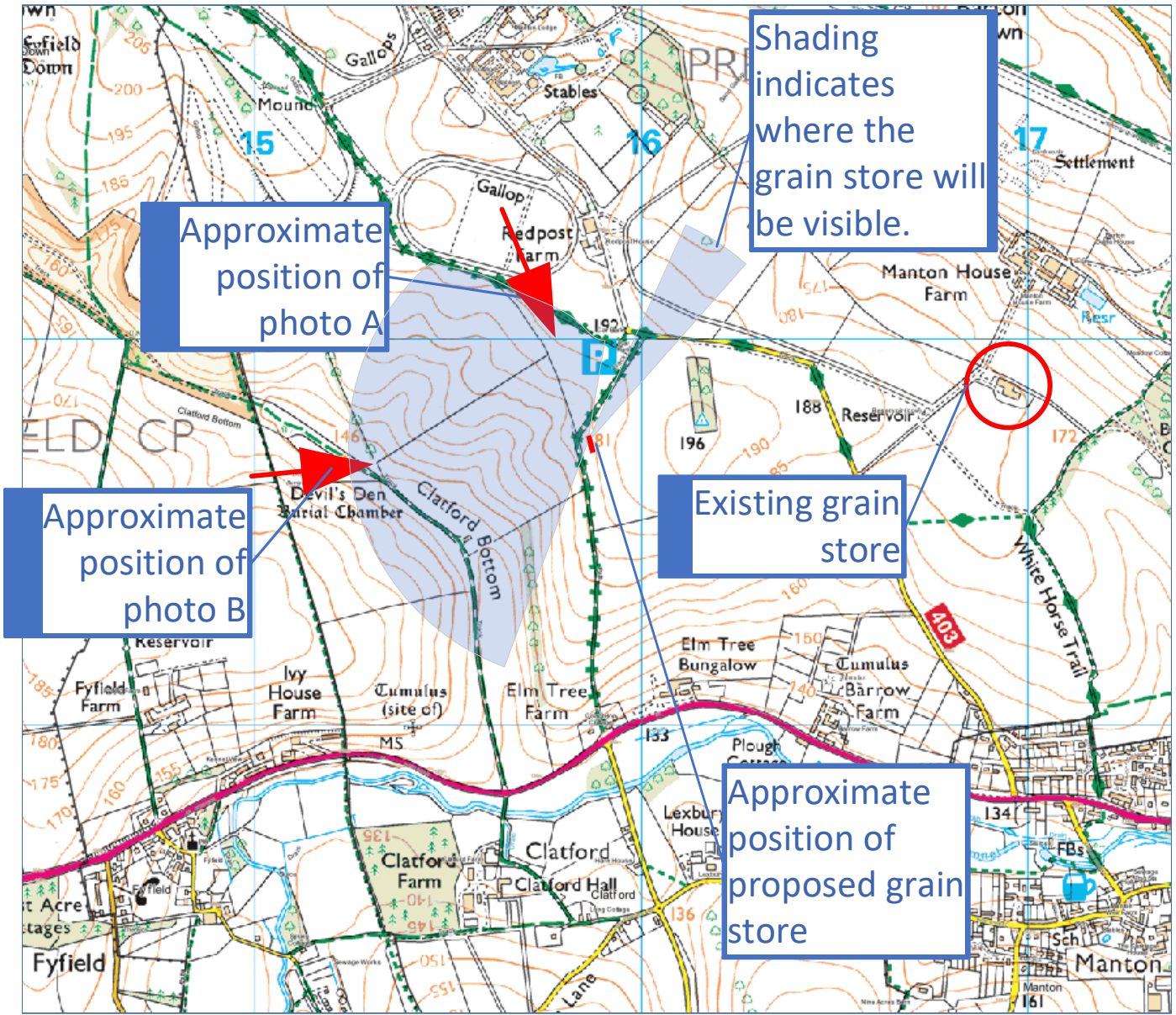


Figure 2 Location map, showing position of photos A and B, plus where grain store will be visible.

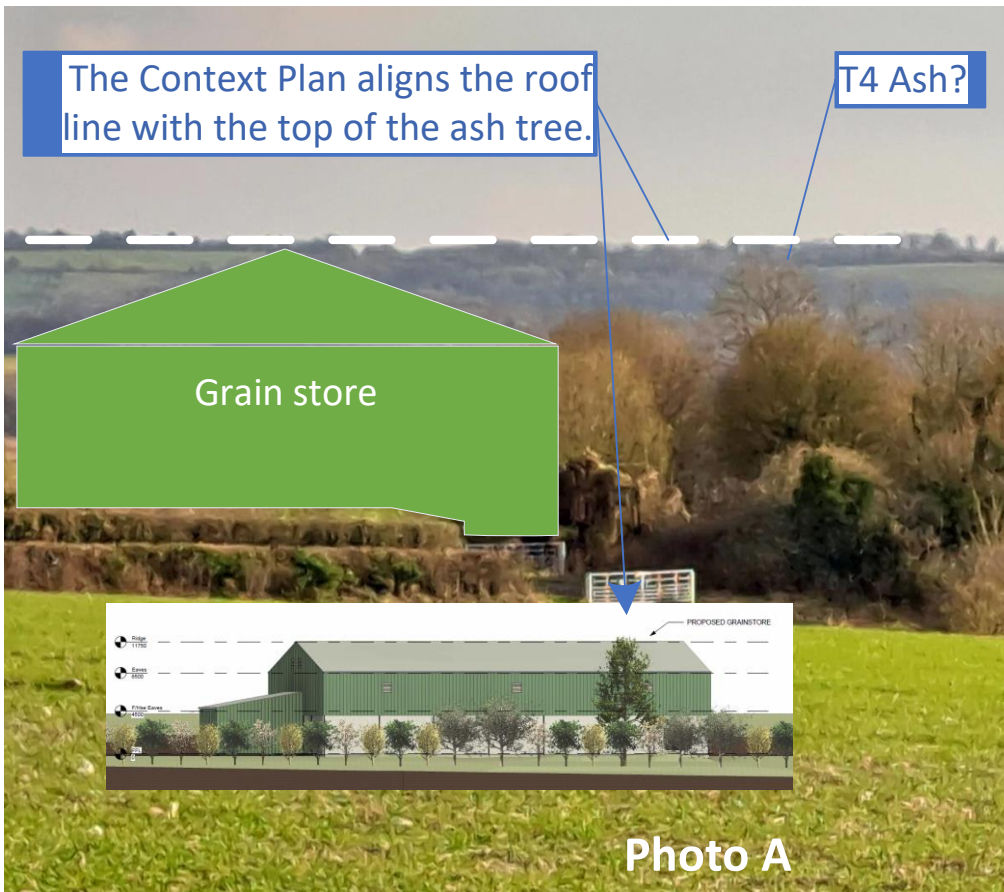


Figure 3 Picture taken from track heading north from car park towards the gallops



Figure 4 Photo taken from Devil's Den looking towards grain store