

**Objection to application reference: PL/2025/06615**

Erection of building comprising 4No. flexible B8 storage and distribution and/or Class E(g) Commercial, Business and Service units and erection of building for mixed agricultural and equestrian workshop, storage and estate office and stables, all following demolition of existing B8 storage building and site remediation, together with associated parking, servicing, drainage, infrastructure, biodiversity net gain and landscaping and alterations to existing vehicular access at: Building at Seagry House, Off Henn Lane and Startley Road, Upper Seagry, Chippenham, SN15 5HD.

I write in my capacity as a concerned local resident, having lived within the village for over 14 years. I am Chairman of Seagry Parish Council, but I should make clear that I declared an interest in respect of this item when the PC considered the application so that I would be free to object in a personal capacity. Nevertheless, I note that the Parish Council has also raised objections in respect of the application.

I am quite proud of the fact that in my 11 years as Chairman of the PC, the PC has supported around 90% of all PA's. As our made Neighbourhood Plan notes, appropriate development is essential to the sustainability of our Parish. However, I believe there are a number of elements, primarily relating to scale, which make this proposal wholly unsuitable for the site, comprising land adjacent to a small village and in a rural setting.

In order to be compliant with relevant policy applicable to applications proposing additional employment land development contained within CP34 of the Wiltshire Core Strategy (WCS), development in this location would be required to **meet all** of the following criteria (my emphasis added):

- a) *meet sustainable development objectives as set out in the policies of the Core Strategy and*
  - b) *be consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity and*
  - c) *be supported by evidence that they are required to benefit the local economic and social needs and*
  - d) *would not undermine the delivery of strategic employment allocations and*
  - e) *be supported by adequate infrastructure.*
- (CP34, WCS)

For reasons set out within this letter I do not consider the proposed development could reasonably be regarded to meet any of the above criterion a-e). Taking these in turn:

- a) *meet sustainable development objectives as set out in the policies of the Core Strategy*

Sustainable development objectives comprise economic, environmental and social components. The WCS settlement and delivery policies set out where development should be located within the county in order to achieve sustainable communities and development. Upper Seagry is defined as a Small Village within the settlement strategy due to its low level of services, facilities and employment and the settlement characteristics. In such locations, the delivery strategy limits development to infill

within the existing built area and that needed to meet local needs of the settlement subject to certain proviso's. The scale of commercial development proposed under this application far exceeds the village, parish or local community needs. It is not within but is at best adjacent to the built area of the village, and the development of the site in the manner proposed would irreversibly alter the landscape and character of the village. It would also have a detrimental impact on highway safety and the safety of all road users, drawing in commercial traffic, visitors and vehicle dependent employees on a large scale to this rural village, the local road network being entirely unsuitable to cater for such traffic. Taking the three strands of sustainable development as a whole, it is my view that the proposed application would clearly not constitute a sustainable form of development in this rural edge of small village location.

*b) be consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity*

I do not consider that any reasonable decision maker could conclude that the scale of this proposed development is consistent with its location, namely a rural setting outside a small village. The development would dominate not just the surrounding houses but the village as a whole. It would result in the loss of over half of the existing trees on site and would require off site land to be given over (most likely to tree planting) in order to meet the biodiversity net gain requirements, which cannot be met on the site given the intensive scale of the development in this rural location. Each commercial unit would easily constitute the largest building in the village alone, and there are four of them in a row. From my review, I do not consider that the application particulars have accurately recorded and tallied the floor area calculations and as a result have downplayed the total new floor area proposed, which again is misleading and should be clarified. I don't know of any Small Villages in Wiltshire with a commercial development of this size and the applicant does not refer to any, so I strongly suspect there are none.

For context, new out of town retail developments in excess of 200sqm of gross floorspace are required by CP40 of the WCS to be accompanied by an impact assessment on existing units and follow a sequential approach to site selection. Whilst the proposed use is not for a retail development, the proposed floor area is by my calculations, almost 10 fold this threshold and gives an indication of the scale of commercial use proposed adjacent to our small village. As a result I would request that the Council officers consult with relevant internal departments to evidence that this level of employment floorspace would not undermine the delivery of any strategic employment allocations, as per criterion d) of CP34 of the WCS; those allocated sites having been thoroughly assessed and deemed suitable and sustainable for their allocated employment use.

*c) be supported by evidence that they are required to meet the local economic and social needs*

I am supportive of new development where it is appropriate in scale and location and completely agree that new development is vital to the continued viability of the village. However, given the size of the Upper Seagry, designated as a small village by WC and extending to approximately 100 households, it is clear that the scale of the proposed commercial development which extends to circa 2,000sqm and proposes

circa 80 jobs, far exceeds any local economic or social needs of the village and moreover, that the adverse impacts of the development on the residents of the Parish would far outweigh any benefits.

*d) would not undermine the delivery of strategic employment allocations*

See point b) above

*e) be supported by adequate infrastructure*

There is a long audit trail of PC engagement with WC's LHFIC on the subject of traffic volumes, which both parties recognise are too high for a small village. Proximity to J17 of M4, compounded by the weight restriction on the road in the nearby Sutton Benger which was put in place to divert the lorries of recycled waste which WC send to Wales for processing, means a large volume of vehicles, including heavy vehicles, use village as a cut through. A number of traffic calming measures have been introduced, but in reality have had little impact. This proposal will lead to a substantial increase in vehicular movements in and around the local highway network in this rural village location. I would highlight that the submitted TRICS movements within the applicants' highways report seem to be calculated using net increase floor areas which are premised upon a fallback situation relating to the B8 use a large derelict chicken shed, which has been queried by myself (see below) and others as being inaccurate. Furthermore, the data does not seem to have factored in those movements associated with the predicted job creation and therefore cannot be relied upon and are misleading.

In my view, the proposed access to the site is wholly unsuited to the likely volume and size of traffic, in particular, the side of the road opposite the entrance is dedicated to parking for the allotments, the local pub and the village hall. As such it is reduced to a single lane when cars are parked there. There is a single access proposed for 'emergency use', again wholly unsuitable for the purpose, being on a narrow road, blind hill, etc. The situation as it stands on the ground, is that the majority of the existing site area has virtually no associated traffic generation as supports a long abandoned and derelict chicken shed. This in my opinion, is the accurate representation of the planning fallback use of the site and should be reflected in any TRICS data.

The village does not have realistic alternative sustainable modes of transportation. For the most part, there are no footpaths, and there is no street lighting. The bus service presented in the application is inaccurate, there is an incredibly limited service, which is likely to be lost entirely. There are no other transport links. Any employees and visitors to the site would be highly dependent on travel to and from the site via private motor vehicle. Any considerations of trip generation, or decision on the highway safety and sustainability implications of the proposal should be made on that basis.

In view of the above points, it is my opinion that the site clearly does not benefit from adequate infrastructure to support the scale of development proposed.

Turning now to other points of concern:

The applicant relies upon an aged certificate of lawfulness, granted 20 years ago for the B8 use of a chicken shed to assert that part of the application site has a valid

fallback for B8 commercial use. I note that the validity of this fallback position has been queried by other third parties and as a long standing local resident, I consider that any such use of the site has been long abandoned and therefore would request that the Council carry out their own assessment as to whether the use of the site for B8 purposes has been abandoned before including any such fallback position at a starting point within the consideration of this application. Using my local knowledge, I can confirm that the shed and land it resides upon have been unused and unoccupied for many years. The shed and land on which it resides was purchased by Seagry House a couple of years ago, and before then was owned by a gentleman who was resident in France. There have been no activities of any description on the site over the past few decades, except in recent months when the new owners have undertaken 'site clearance' activities (e.g. removal of trees). Incidentally, I was surprised to see the lawful development certificate is dated as late as 2005, as use of the chicken shed building had ceased a long time before then.

The proposal certainly conflicts with Seagry's Neighbourhood Plan, which was made in May 2021. The proposed development would potentially impact two 'valued views' and is close to two 'non-designated heritage assets'. It does not constitute 'in-fill', which is the only type of development anticipated by the NP (consistent with the Core Strategy). Furthermore, the applicant has not engaged in the Community Involvement Protocol which is set out in the NP.

In summary I strongly object to the proposed development, primarily due to the scale and subsequent impact on local highway infrastructure and safety. I consider the application is contrary to the development plan, specifically CP34 (additional employment land) and CP60-64 (highway safety) and several objectives of the made NP. I am also concerned that the application particulars contain several inaccuracies namely the validity of the fallback planning use upon which the applicant has based floor areas/trip generation calculations, which are misleading and as a result downplay the likely impacts of the scheme on our small village and its rural setting.

I am aware there is considerable local objection to the scheme from within the village, as is reflected in the numerous third-party objection letters which I can see have already been submitted to the application and uploaded to the Council's website. It is disappointing that the applicant has not engaged with the Parish Council or local community prior to the submission of this application, my understanding that as a major application this should have been a validation requirement (the application not containing an SCI) and is clearly advised within national policy contained within the NPPF and policy set out within the NP. Given the scale of the proposal relative to our small village, and as it is contrary to development plan policy within the WCS and NP I formally request that the application is heard at planning committee should officers consider a recommendation of approval. I have copied my local member into this correspondence.

Regards

Michael Barber