

PLANNING OBJECTION

Application References: **PL/2025/08985 and PL/2025/08977**

Site: Land north of the A338, East Grafton, Wiltshire

Objector: Nicola Baxter, Park Cottage, East Grafton, SN8 3DD

Dear Ms Rutter-Dowd,

I am writing to formally object to the proposed residential development comprising five dwellings in total on land adjacent to my property, Park Cottage, under planning applications PL/2025/08985 (1 dwelling) and PL/2025/08977 (4 dwellings).

For clarity, PL/2025/08985 relates to the dwelling immediately adjoining Park Cottage, while PL/2025/08977 relates to four dwellings on the adjoining land to the east. Although submitted as separate applications and by different applicants, the proposals concern adjoining parcels of land and rely on surveys that whilst are not identical, they are closely comparable in scope, timing and methodology.

This demonstrates that the applicants recognise the two sites are physically, environmentally and planning-wise linked, and they must therefore be considered together, with full regard to cumulative impacts.

While I support the principle of delivering additional housing, particularly where it meets genuine local need, it is essential that new development respects environmental constraints, heritage assets, landscape character and neighbouring amenity. In this case, the proposals fail to achieve that balance. They raise significant ecological, landscape, heritage, archaeological, drainage and residential amenity concerns, several of which prevent lawful determination at this stage.

These concerns are supported by an independent ecological survey undertaken at Park Cottage by NatureBureau Ltd (Roost Assessment and Phase Two Bat Surveys, September 2025).

1. Ecology – Protected Species, Bat Roosts and Inadequate Survey Evidence

1.1 Confirmed bat roosts and activity immediately adjacent to the site

Independent bat surveys at Park Cottage (appendix A) which directly adjoins the application site, confirm the presence of multiple bat roosts and regular foraging and commuting activity along the boundary hedgerows (PL/2025/08985). The survey recorded common pipistrelle, soprano pipistrelle and brown long-eared bats, with thousands of droppings present in the loft, indicating long-term use.

These hedgerows form part of a continuous bat corridor along the village edge. All bat species and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981.

1.2 Applicant's own evidence confirms bat use

The applicant's Ecological Assessment (PL/2025/08985) and the Ecology and BNG survey (PL/2025/08977) acknowledges that bats are likely to forage and commute along the site boundaries and commuting and foraging across the general site. The bat assessment (PL/2025/08977) is based entirely on a single Daytime Bat Walkover (DBW) undertaken on 21 February 2025.

Given this acknowledgement and the adjacent confirmed roosts, the proposals would normally be supported by bat activity surveys to meet BCT good practice and to allow the LPA to reach a lawful conclusion.

1.3 Failure to undertake required bat activity surveys

Despite clear evidence and recognised triggers, the applications are not supported by:

- Dusk or dawn emergence/re-entry surveys
- Bat transect surveys
- Static acoustic monitoring

In the absence of this information, the Local Planning Authority cannot lawfully conclude that the proposals would not adversely affect protected species.

1.4 Hedgerow disturbance, access works and lighting impacts

The proposals include new access arrangements, hedgerow disturbance and external lighting. These elements risk fragmenting established bat commuting routes and degrading foraging habitat, particularly given the confirmed presence of roosts immediately adjacent.

As a result, the proposals conflict with:

- The Wildlife and Countryside Act 1981
- The Conservation of Habitats and Species Regulations 2017
- NPPF 2024 (as amended)
- Wiltshire Core Policy 50

Works affecting bats would require a European Protected Species Mitigation Licence. Given the absence of adequate survey evidence and mitigation detail, the applications are premature and should be refused or deferred.

1.5 Winter baseline limitations affecting ecological confidence (PL/2025/08977)

The UKHab/PEA baseline work for PL/2025/08977 was undertaken on 21 February 2025, which the report itself acknowledges is sub-optimal for botanical survey. This undermines confidence in habitat classification and condition assessment and therefore the robustness of the biodiversity baseline relied upon for decision-making.

2. Impact on the North Wessex Downs National Landscape and Agricultural Land

The sites lie within the North Wessex Downs National Landscape, where great weight must be given to conserving and enhancing landscape and scenic beauty (NPPF 2024 National Landscapes section; conserving and enhancing the natural environment)

Although the application forms identify the land as agricultural paddock, the Planning Statement repeatedly describes it as “vacant” or “unused” land. This misrepresents the site’s rural and agricultural character, which forms an important part of the National Landscape.

The proposals would:

- Result in the permanent loss of agricultural land
- Introduce suburban built form and domestic activity at the rural edge of the village
- Erode the open character of the surrounding landscape

Additional harm from tree and hedgerow loss

The development would require removal (PL/2025/08977) or significant alteration of trees and hedgerows to accommodate access works, visibility splays and domestic curtilage. These features are integral to:

- Landscape containment
- Rural character
- Ecological connectivity

Their loss would increase the visual prominence of development within the AONB. Replacement planting cannot compensate for the immediate and long-term loss of mature landscape features. This conflicts with Core Policy 51, the AONB Management Plan, and national landscape policy.

3. Impact on the East Grafton Conservation Area and Park Cottage

Park Cottage lies within the East Grafton Conservation Area, and the proposed dwelling under PL/2025/08985 would directly abut its boundary.

The submitted Heritage Statement:

- Does not adequately assess the contribution of Park Cottage as a sensitive heritage receptor or its rural edge setting to significance, nor the effect of the proposal's scale and proximity on that setting.
- Does not adequately assess the impact of scale, massing and proximity
- Underplays the loss of the cottage's historic rural backdrop

Instead, it focuses disproportionately on distant parts of the Conservation Area, such as The Green, while downplaying harm at the western edge.

Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, special attention must be paid to preserving or enhancing the character and appearance of Conservation Areas. The proposals fail to meet this statutory duty.

4. Heritage Harm to the Setting of Park Cottage

Park Cottage is a modest historic cottage whose significance is closely tied to its small scale and rural edge setting. The proposed dwelling under PL/2025/08985 (approximately 274 sqm plus a large garage, ridge height approximately 8.9 metres) would:

- Be disproportionate in scale
- Appear visually dominant
- Harm the cottage's historic rural context

The Heritage Statement incorrectly conflates limited visibility with absence of harm. Harm can arise through changes to character, loss of historic land-use patterns and erosion of rural setting, even where views are partially screened.

5. Archaeology – Lack of Required Assessment

5.1 Failure to follow pre-application advice

At pre-application stage, the Council's archaeological advisor identified the potential for unrecorded archaeological remains due to the village's medieval origins and nearby cropmark evidence, and requested a geophysical survey and archaeological assessment.

5.2 Inadequate heritage submission

No archaeological assessment or geophysical survey has been undertaken, and cumulative impacts across both sites have not been assessed. The applications are therefore unsupported by sufficient evidence to allow an informed decision.

6. Residential Amenity

The proposed dwelling adjacent to Park Cottage would result in:

- An overbearing form and mass
- Direct overlooking of bedroom windows and private garden areas
- Significant loss of privacy and outlook

This conflicts with Core Policy 57 and established residential amenity standards.

7. Flood Risk and Drainage

The submitted approach appears to rely on infiltration in an area identified as being at risk of groundwater flooding, with concerns including the reliability of infiltration testing, surcharging/exceedance risk and the potential for exceedance flows to leave the site. A cumulative drainage assessment across both applications is required.

8. Water Stress and Sustainability

The proposals do not adequately address water supply capacity, water efficiency measures, or cumulative impacts. This raises concerns in relation to sustainable development objectives

East Grafton lies within a water-stressed area and has experienced water restrictions in recent years (including a hosepipe ban in 2025). The applications do not adequately address:

- Water supply capacity
 - Water efficiency or neutrality
 - Cumulative impacts
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9. Requested Actions

Given the above, I respectfully request that the Local Planning Authority:

- Refuse the applications; or
- Defer determination pending:
 - Bat activity surveys and a lighting plan with lux contours
 - A combined archaeological assessment and geophysical survey
 - A cumulative drainage and flood-risk assessment
 - Clarification of biodiversity net gain and mitigation for both applications

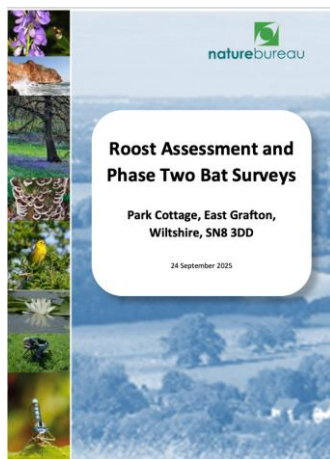
Conclusion

While I support the principle of new housing, the ecological shortcomings alone prevent lawful approval of these proposals. When combined with harm to the National Landscape, Conservation Area, heritage assets, archaeology, residential amenity, drainage safety and water resources, the developments are neither sustainable nor appropriate.

For these reasons, I respectfully request that planning permission be refused or deferred until all the outstanding matters are fully addressed:

Yours sincerely,
Nicola Baxter

Appendix A - Roost Assessment and Phase Two Bat Surveys of Park Cottage, East Grafton, Wiltshire, SN8 3DD - 24 September 2025



Appendix B - Photographs (Taken 15th December 2025)

Photo 1 – View Looking West from North side of village green Relationship between Park Cottage and Conservation Area edge



Photo 2: View from Park Cottage bedroom 1 window towards proposed dwelling location



Photo 3: View from Park Cottage bedroom 2 window towards proposed dwelling location



Photo 4: (view West from proposed development to Park Cottage water pooling and rural land use)



