

Ms Julie Mitchell
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
BA14 8JN

19.03.26

Email: julie.mitchell@wiltshire.gov.uk

Dear Julie

Objection to Planning Application PL/2026/01383

Land off Blind Lane, Southwick, Wiltshire

I write today to object to the above planning application which is seeking full planning permission for up to 90 houses along with a new access and other works.

This letter sets out a summary of my concerns and I consider there are fundamental reasons why the application should be refused.

Application Form

The application form includes several errors:

- Contamination – Does the proposal involve a proposed use that would be particularly vulnerable to the presence of contamination? The answer should be yes.
- Flood Risk – Is the site within an area at risk of flooding? The answer should be yes as the site is not wholly within Flood Zone 1. A corner of the site also has high groundwater.

The application form should be corrected.

Arboriculture & Ecology

It is noted that at the time of writing this letter the Arboricultural Report is not included online and as such the consultation period should be extended once this is available.

This is a crucial matter given the application form confirms the site includes a veteran tree. The application should not have been made valid without it.

Yes – a veteran tree is present within the Site boundary (Figure 1). This has been indicated within the baseline habitats tab of the metric.
According to the site plan (Place by Design, 2026) there will be no loss of this irreplaceable habitat

Figure 1: Application form extract

Veteran trees are afforded the highest level of protection and are an irreplaceable habitat. Page 5 of the ecology report confirms they are of 'national importance'. Paragraph 193c) of the NPPF states that, "*development resulting in the loss or **deterioration** of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*".

Does the tree report consider the impact the nearby drainage basin and pumping station could have on the root protection area of the veteran tree along the north eastern boundary?

Given the amount of development proposed in such close proximity to the veteran tree, I object on the basis of the conflict with Para 193C.

It is also noted in the BNG report that there has been **deliberate habitat degradation** prior to the submission of this planning application. A mature tree within a hedgerow was removed in October 2025. It is unclear what category this tree was but I trust the tree report will confirm this detail.

Was this tree assessed for potential bat roost features?

It is very surprising that Wain Homes removed a tree and part of a hedgerow on Wesley Lane in October 2025 when they would have received pre-app advice earlier in 2025, which I expect would have included reference to trees and the need for a report to be obtained to support this planning application.

It is also noted in the BNG Assessment that the site survey was undertaken in 2023. Three years ago. Surely the survey findings are now out of date?

The Ecological Assessment also relies on out of date and incomplete data. Given bats are a protected species, surveys should be carried out in full during the appropriate times of the year:

During the automated data collection in 2025, 45 out of the required 50 survey nights were covered due to equipment failure on the five nights not covered. However, in line with the survey requirements outlined in the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS), at least 50 survey nights were captured during the automated surveys undertaken in 2023 and 2025 combined. Although the initial surveys were undertaken in 2023, the data is still considered to be valid and provides valuable contextual information to supplement the 45 nights of data collected in 2025. The activity levels and species recorded are considered to be typical of a site of this type in this location, therefore the missing five nights in 2025 are not considered to be a limitation.

Figure 2: Ecological Impact Assessment extract

The site walkover was undertaken in January 2024. Over two years ago. Habitats and species on site could have changed significantly since then and a new walkover should be undertaken.

Impact on the Character and Appearance of the Area

The proposed layout is overly dense and gives a suburban feel which is totally out of character with this part of Blind Lane. The eastern side of Blind Lane is characterised by linear development comprised of individual properties within spacious plots. There are no cul-de-sacs. More built up areas of housing developments are to the western side of Blind Lane, given this area forms a main part of the village. The eastern side has a completely different character leading to the wider open countryside beyond (of which this application site forms part of).



Figure 3: Linear housing along the eastern side of Blind Lane (to the north of the application site)

Drainage

The submitted drainage strategy does not include BRE365 testing to confirm that infiltration is not a feasible option. Infiltration testing mentioned in the ground report is not sufficient. The proposal is therefore not in line with the SUDS hierarchy.

Winter groundwater monitoring testing has also not been undertaken which seems essential given there is a corner of the site (within the red line) that has high groundwater.

Given the Council's SFRA map should not be relied upon, the Applicant should undertake testing to establish the exact extent of the high groundwater levels. Given it is now March 2026, this will need to be undertaken next winter (to confirm worst case scenario) and should also be provided prior to determination given it could cause in principle issues if groundwater is found to be high further into the site where built development is proposed.

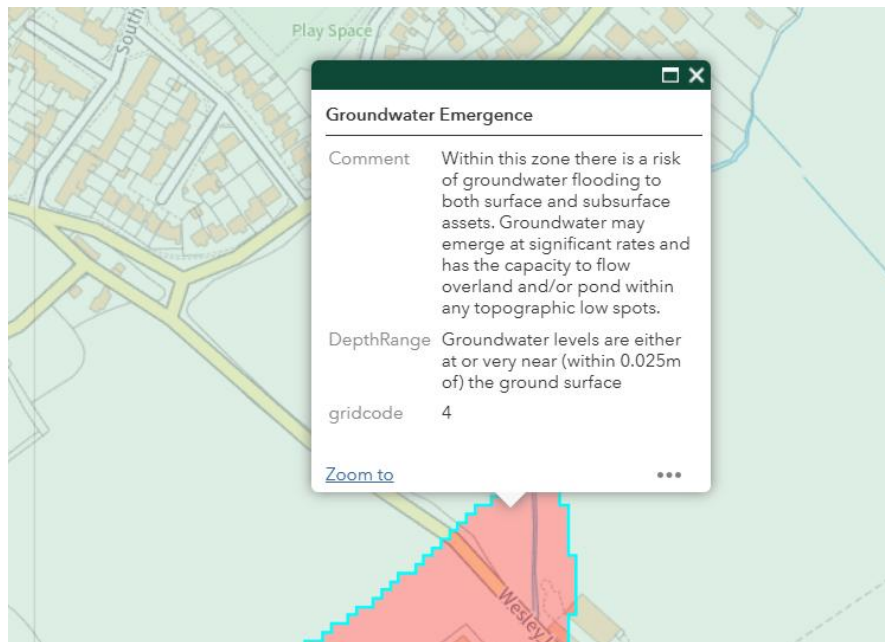


Figure 4: Wiltshire's SFRA Groundwater Map

Given the presence of Flood Zone 2 and 3 in parts of the site, together with the presence of high groundwater, I strongly object to the application on drainage grounds.

The NPPF's tilted balance states (paragraph 11 d i) *"the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed"*.

Footnote 7 clarifies that 'assets of particular importance' specifically includes 'areas at risk of flooding'.

Accordingly, the tilted balance is NOT engaged. This means full weight must be afforded to the fact the site lies in the open countryside. The Applicant's planning statement and associated planning balance is therefore largely irrelevant. Full weight must be given to the Wiltshire Core Strategy.

Highways

Paragraph 116 of the National Planning Policy Framework (NPPF) states,

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios".

The submitted TS details how the traffic survey was undertaken in July 2025, during fine weather. This is not considered to represent a realistic scenario. Many people go on holiday during July and if weather is fine then more people within the village would be inclined to walk or drive to facilities in the village such as the primary school and pre-

school. The survey would be more realistic, or be able to be confirmed as accurate if a further survey was undertaken outside of summer month when traffic is typically lower.

Paragraph 4.29 of the TS recognises that Wesley Lane and Blind Lane are lightly trafficked currently, *“reflecting their local access function rather than serving as through routes”*. It can be concluded from this that an 200 extra cars on this site would make a significant difference and have a severe impact in the context of Paragraph 116.

The TS also confirms there are no cycle routes in Southwick and the nearest bus stop is over 400m away. This is not a sustainable location for such a major development.

Small scale housing similar to the adjoining linear development of properties to the north (eastern side of Blind Lane) would be a much more appropriate scale and still offer benefit of housing to the village.

Conclusions

To summarise, the application is flawed in many areas including:

- Application form contains errors
- Tree report is missing
- Ecology reports are out of date
- Impact on the character and area – suburban layout and high density is not suitable for this rural part of Blind Lane
- In principle (housing is not supported in this location) and the tilted balance is not engaged given parts of the site are at risk of flooding
- Drainage information does not include infiltration or groundwater monitoring
- Highways survey is not considered to be representative given it was undertaken in July

Lastly, please could you provide me with a copy of the pre-app feedback (reference ENQ/2025/00170), or do I need to submit a FOI request to obtain a copy?

I look forward to your reply and please do keep me updated on progress of the application.

Kind Regards,

A solid black rectangular box used to redact the signature of the sender.

Mr and Mrs Wilkinson