

Wiltshire Council
County Hall
Trowbridge,
Wiltshire,
BA14 8JN

31 March 2026

By Email

Dear Sir

Application PL/2026/01620: Permission in Principle for Development of up to Two Houses on Land North of West Street Great Somerford

This letter is written on behalf of Miss Amanda Kent of The Squash Court Great Somerford, Mr and Mrs Simmonds of The Granary, and Mr and Mrs Harrison who live directly adjoining the application site at Manor Farmhouse.

This letter adds to the chorus of objection (in excess of ninety comments online, none of which were supportive) to this proposal from local people who live in Great Somerford.

Constraints

The site is outside the settlement boundary, located within the designated Conservation Area, the route of a public footpath (a public viewpoint). Manor Farmhouse is a listed building Grade II, and the development is within its setting. It is also within the setting of non-designated heritage assets at The Manor Stables and The Squash Court. The land is designated in the Somerford Neighbourhood Plan (NP) as Local Green Space (LGS).

Planning law in relation to development in conservation areas is set out in The Planning (Listed Building and Conservation Area) Act 1990 where s72 requires:

'Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'

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The Policies of the Somerford Neighbourhood Plan 2016-2026

The Neighbourhood Plan at paragraph 2.3 sets out the priorities of the NP which were to identify additional housing, and to *'identify those areas which are currently undeveloped and which the parish wishes to retain as local green space'*. The parish identified eight sites within Great Somerford including the application site.

National planning policy set out in the National Planning Policy Framework 2024 at paragraph 106 and 107 supports the designation and makes the point LGS should *'only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period'*.

Paragraph 108 states:

Policies and decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts set out in chapter 13 of this Framework'.

This requirement has been overlooked in the submitted application for two houses. As is well understood Green Belt policy includes the purpose of safeguarding the countryside from encroachment.

The LGS is not simply a local whim, but a designation of some significance carrying weight in any decision-making process.

In summary the reasons for the objection are as follows:

Heritage Assets

- The application neglects to consider whether the proposal *'preserves and enhances'* the Conservation Area in accordance with section 72(1) of the Planning (Listed Building and Conservation Area) Act 1990.
- No attempt has been made by the applicant to address paragraph 212 of the NPPF which requires the impact of the development on the significance of the Conservation Area to be addressed.
- Paragraph 213 requires the impact on setting to be justified, but this is missing too.

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- Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Framework advises that this harm should be weighed against the public benefits of the proposal. The public benefit of two houses is questioned.
- A new access will not only change the character of the Conservation Area, but the question is just how safe it will be? No speed surveys or other information is submitted to deal with this.
- The Planning Statement refers to using the existing field gate, but this crosses the driveway into Manor Stables and Manor Stables Cottage. Whether a legal right exists for access across this track is not mentioned. The site is potentially undeliverable.
- As Objector Mr Trevor Harrison of Manor Farmhouse notes in his objection:

'The boundary walls forming the curtilage of our property are also Grade 2 listed. These include the 130 ft stretch of walling forming the Eastern perimeter of our property and the Western perimeter of the proposed development site. This wall is clearly visible from the footpath crossing the development site, and the remainder of the "school field" joining West Street with Hollow Street; the wall significantly adds to the overall character of the setting. It is evident any housing development would obscure this defined heritage asset from the public view'.

- The proposal interrupts the historic settlement pattern of the village which is formally recognised by the somewhat unusually fragmented village settlement boundary and was an important part of the deliberation of the Neighbourhood Plan inspector.

The Permission in Principle (PIP)

- It is not agreed as set out in 5.8 of the Planning Statement that there *'are no major policy obstacles material to the decision other than the site being outside settlement boundaries'*.

The policy obstacles are the location in the Conservation Area in the setting of a listed building, and the designation of Local Green Space.



- It is appreciated the details of the development will be revealed at the Technical Detail stage but as this will have great bearing on the Conservation Area it is necessary to know how the site is to be divided. Is it diagonally, or two narrow strips, or another drive parallel to the existing? If it is one house, where is it to be located? The PIP is not the right mechanism to use for this location.
- The construction of up to two houses together with associated activity, vehicle movements and noise would inevitably domesticate the site losing the site's open and rural quality.
- The Planning Statement makes reference to the PIP appeal for a site in West Street, reference PL/2023/06033. The application differs in several respects to the application site including the point it is not designated as a Local Green Space. The Inspector notes this specifically at paragraph 9 of the decision.
- Each case must be determined on its own merits. Just because the Inspector carried out her duty under section 72(1) of the 1990 Act for that site, it does not mean it is the right decision for this PIP.
- At paragraph 11 of the appeal consideration is given to the 'linear pattern of West Street' and then states at paragraph 11 *the site has a wooded area giving a degree of separation*, again this is not a feature of the application site. The inspector also comments that plots in the area are generally spaciouly arranged within relatively large plots; if two houses are located on the application site this is out of character with the area.
- The Planning Statement at paragraph 5.12 tries to suggest that the amount of Local Green Space in Great Somerford is not justified. The spaces are part of the character of the village and have been supported and recognised as important by the local community as part of its NP. The sites are all close to the local community and are significant because of their intrinsic beauty, and tranquillity. In the case of this Local Green Space the route of the footpath across the field further contributes to local people's appreciation of the space.
- At paragraph 5.17 the Planning Statement suggests the LGS designation is not a nationally restrictive policy, but the reference to paragraph 108 of the NPPF, and careful reading of footnote 7 of paragraph 11 of the NPPF does give considerable weight to the status of LGSs.
- It is accepted the Wiltshire Local Plan is in a state of flux, and Housing Land Supply is short, however the location of the site within the Somerford Conservation Area and designated as Local Green Space (both mentioned in footnote 7) means paragraph 11 (d), the presumption in favour of sustainable development is not supported in this case.

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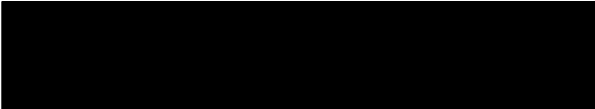
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- The cited case law appears to try to argue that if policies relating to housing land supply are out of date, this trumps everything else, but this is not correct. There is a distinction between housing land supply policies and policy relating to other concerns such as heritage assets.
- On a practical note, recent housing development in the village is struggling to sell which suggests there is no pressing need for more open market houses in the village.

The principle of the development is not acceptable particularly with regard to its impact on the Conservation Area and Local Green Space. The safety and deliverability of the access is also questioned.

Wiltshire Council is respectfully requested to refuse Permission in Principle.

Yours faithfully



Judith Norris B.Sc. M.Sc. FRICS IHBC FPASoc Ag

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