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Planning Application Reference: PL/2026/01169
Our reference: MLP26017

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Dear Adrian,

PL/2026/01169 for 'Outline Planning for the Erection of 8 self build dwellings, associated works and landscaping - some matters reserved except for access' at North of Seagry Road, Great Somerford

On behalf of **Great Somerford Parish Council**, I am instructed to make representation in respect of the above referenced planning application. The Parish Council has considered the application, including the revisions published on the 19th May 2026, and **OBJECTS** to the development proceeding.

Reasons for the objection include the following:

- Conflict with the strategic aims of the development plan;
- Securing of self-build;
- Concern over access and highway safety;
- Local character and the Historic Environment; and
- Ecology.

Conflict with the strategic aims of the development plan

The development would conflict with the development plan in terms of its strategic policy, being the interrelated Core Policies 1, 2 and 13, in proposing development outside of the limits of development for Great Somerford, with none of the identified policy exceptions to the general policy of restraint in the countryside providing a basis for policy support. Moreover, Policy GSNP1 of the Great Somerford (incorporating Startley) Neighbourhood Plan (GSNP) confirms that there will be a presumption in favour of sustainable development on the allocated sites and others falling within the revised limits of development boundaries, shown on Appendix D2.

Whilst the Council is currently unable to demonstrate a five years' supply of housing, policies of the Framework that protect areas and assets of particular importance can represent strong reasons for refusing development (as will be demonstrated later in this letter). As a result, it is submitted that the tilted balance is not operative in this case as other matters provide a strong reason for refusal. In any event it is the Parish Council's position that the adverse impacts of the development would significantly and demonstrably outweigh the benefits and that this application should be refused first and foremost due to the in-principle strategic conflict.

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Securing of self-build

The provision of self-build is acknowledged as having positive weight as a material consideration, where a need exists and such provision can be secured. A planning obligation is required in order to ensure that the self-build element is delivered. The Parish Council is not aware that any unilateral undertaking has been submitted to ensure the delivery of the development as self-build, nor have any draft heads of terms been published. Until such steps are taken the benefits of self-build cannot be treated as material consideration.

Concern over access and highway safety

The application is made in outline with all matters reserved except for access. The access is presented in the Transport Statement and the Access Plan for which permission is sought is assumed to be Drawing No. 10524/202 Rev C. This plan shows a vehicular access and pedestrian access, lying outside of the application red line. Given that access is not a reserved matter the Council must satisfy itself that the access layout shown is enforceable in spite of the access' location outside of the site.

The Parish Council notes the contents of the Road Safety Audit and Transport Plan, which is intended to consider the traffic, transportation and highways implications associated with the development. Unfortunately, the methodology of the traffic survey enclosed within provides significant cause for concern. The traffic survey was undertaken at a time when construction was underway at the nearby Broadfield Farm site. This development affected the movement of traffic significantly for the duration of its construction. The methodology presented within the Statement does not indicate how this was taken into account, if indeed it was. Consequently there is reason to doubt the appropriateness of the stipulated visibility splays, and it is not clear that a more appropriate visibility splay is achievable to serve the proposed site access.

In the event that the pedestrian access is to be seen as a material consideration as a benefit weighing in favour of the application, this must be secured in order for the benefit to be captured. No draft heads of terms for a planning obligation has been submitted ensuring the delivery of the pedestrian footpath, a necessity as it involves land outside of the application red line and outside of the Applicants' control. The application, notwithstanding the Parish Council's overall objection, should not be approved without this provision being secured by legal agreement.

Local character and the Historic Environment

The site is located within the Great Somerford Conservation Area. This is a designated heritage asset, and conflict with national policy in respect of heritage assets can represent a strong reason for refusal of planning permission for the purposes of Paragraph 11d)i. of the Framework. As set out at NPPF Paragraph 213, any harm to the significance of a heritage asset should require clear and convincing justification. Furthermore, the Council has a duty set out at Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 when performing functions under the planning Acts to pay "*special attention... to the desirability of preserving or enhancing the character or appearance of that area*".

The Conservation Area (CA) is characterised by a number of significant green gaps breaking up development throughout the village and, so far as relevant to this application, by the low lying open approaches from the south and west. The site occupies a prominent area of green, with valuable glimpses towards West Street across parkland, lending real aesthetic value to the CA and making a substantial contribution to local distinctiveness. This part of the CA is an area of particular evidential value, due to its unspoilt nature showing historic boundaries dating back to the time of enclosure, and indeed due to the fact it has not been cultivated by heavy machinery, represents the finest example of historic open space left to the village.

In developing this open approach, this proposal would eradicate the parkland setting, eroding the distinctiveness of the village and to the detriment of the special qualities of this part of the CA. The development would therefore cause harm to the significance of the Great Somerford Conservation Area.

The Parish Council are greatly troubled, therefore, by the Heritage Report's assertion that the development would not result in harm. Indeed, this finding, which the Heritage Report admits is based only on a *"rapid assessment"*, betrays an incomplete understanding of the special architectural or historic interest of the CA. Whilst the harm to the significance of the CA would be less-than-substantial for the purposes of the NPPF, the harm is demonstrable and not insignificant. As a result the Parish Council cannot agree that it is at the bottom end of that spectrum.

Harm to heritage assets should require clear and convincing justification. Whilst Core Policy 58 requires that *"Development should protect, conserve and where possible enhance the historic environment"*, the Framework sets out at Paragraph 215 that the harm should be weighed against the public benefits of the proposal. In this instance the Parish Council proposes that development of this site to form eight dwellings, whether self-build or open market, would not provide public benefits that outweigh the likely harm to be caused to the significance of the CA.

Consequently, it is concluded that the harmful impact on the designated heritage asset and the local character would conflict with Core Policies 57 and 58 of the WCS and the Council's Section 72 duty, and the conflict with policies relating to heritage assets in particular would represent a *strong reason* for refusing planning permission.

Ecology

The application is supported by an Interim Ecological Impact Assessment that states that additional survey work will be required to understand the impacts on protected species. Additional information would also be required in order for the Applicants' Ecologist to be satisfied as to the impact of lighting on bats: *"It is not possible to conclude the impacts on commuting bats until a sensitive lighting plan has been produced and approved by a SQE."*

Amendments and additions to a scheme are not an alternative to well thought through and properly prepared schemes. It is clear that the shortcomings of the ecological information were evident to the project team prior to the application submission, as the Interim Ecological Impact Assessment itself tacitly acknowledges.

It is the Parish Council's submission that the application represents an incompletely prepared proposal, and this has led to the inability to reach timely conclusions on the development proposed. The Parish Council proposes that the application should be refused, alongside the other reasons presented here, for reason of the insufficient information in respect of the ecological impact of the development.

Drainage

The application is supported by a Flood Risk Assessment and Drainage Strategy. This proposes an attenuation basin based on calculations made by the Flood Risk engineers. The site is fronted by a drainage ditch. The proposal involves the creation of site access across this drainage ditch and it is unclear how the Applicant intends to protect the ditch in this area, nor is it clear that this has been taken into account in the calculation of the necessary attenuation volume. The LPA should seek greater clarity in this regard.

Planning balance

Policies of the Framework that protect areas or assets of particular importance provide strong reasons to refuse planning permission for this development; as a result the 'tilted' balance is

not operative in this case. Nevertheless a contrasting 'flat' balance is necessary given the provisions of section 38 (6) of the Planning and Compulsory Purchase Act 2004.

In this case, harm to the application of policies of the development plan, to heritage assets and to highway safety, and the insufficient information in respect of protected species all weigh heavily against permitting the development. It is the Parish Council's submission that the public benefits of new self build housing are not so significant to outweigh heritage harm, meaning there is a strong reason for refusing the development. Moreover, the adverse impacts of other substantive issues mean that granting planning permission would also significantly and demonstrably outweigh the benefits. Material considerations do not in this case indicate that the application should be determined otherwise than in accordance with the development plan, and the application should be refused.

Conclusion

The development would conflict with overarching aims of local and national planning policy, eroding the quality and availability of green space within the village of Great Somerford and having a harmful impact on the local character and the Great Somerford Conservation Area. A harmful impact on the CA that is not outweighed by public benefits is a *strong reason* for refusing planning permission, and there is no 'tilted balance' operative in this case.

The development is contrary to the overarching strategic policies of the development plan set out at Core Policies 1, 2 and (for the purposes of this area) 13. Due to this significant policy conflict and as there is no tilted balance necessary, the development should be considered unacceptable in principle.

The development would have a harmful impact on highway safety and negatively impact the significance of the historic environment. The proposal fails to adequately address the impact on protected species. The application is therefore contrary to Core Policies 50, 57, 58 and 61.

The Parish Council is of the view that sufficient information is currently available to refuse planning permission, as it will not be possible to fully resolve the objections raised above. While the application can therefore be refused without delay, in the event that the application is held in abeyance until the provision of additional ecological information, the Parish Council would welcome the opportunity to consider the additional information and whether providing a written response will be appropriate.

Yours faithfully,

Callan Powers

Callan Powers MPlan
Senior Planner