

Wiltshire Council
Planning Department

1 September 2026

Dear Sir/Madam

Objection Letter – Planning Reference: PL/2026/04926

Proposal – New dwelling in boundary of No.65 Longcroft Road. Removal of existing porch and vehicular access

Site – 65 Longcroft Road, Devizes, SN10 3AX

LRJ Planning Ltd has again been instructed by Mr and Mrs Surman who are the legal owner occupiers of 63 Longcroft Road, Devizes to review and draft a formal response to the above planning application that has been lodged with the Council.

Following a review of the latest submitted plans and supporting documentation with my clients, they continue to have serious concerns regarding the proposed development and, accordingly, maintain their **objection** to the application for the reasons set out below.

The proposed speculative development site adjoins and forms the southern boundary of my clients' property, as illustrated below. By virtue of the site's orientation and its particular spatial relationship with No. 63, any development on the site would result in material harm to my clients' residential amenity and would have a significant adverse impact upon the use and enjoyment of their property. The proposal would therefore give rise to an unacceptable degree of harm and undue blight to my clients' property.



Relationship between application site and No.63

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1.0 BACKGROUND

The current proposal follows the withdrawal of the previous planning application, Planning Reference PL/2026/00914, which sought the erection of a new dwelling within the existing boundaries of No. 65 Longcroft Road, together with the removal of the existing porch. That application was withdrawn on 19 June 2026 and did not address the concerns previously raised in my clients' objection letter dated 2 March 2026.

It is also relevant that an earlier application, Planning Reference PL/2024/03451, for the erection of a two-bedroom bungalow with a single garage and associated parking, was formally withdrawn. The substantive planning concerns set out in my clients' objection letter



dated 13 May 2024 were neither addressed nor resolved prior to the withdrawal of that application.

Those concerns remain material to the assessment of the current proposal. In the absence of any meaningful amendments or substantive supporting justification demonstrating that the issues previously identified have been overcome, my clients consider that the concerns raised in respect of the earlier applications remain directly relevant and continue to apply to the proposal now under consideration.

Lack of Community Engagement

A fundamental concern regarding this application is the evident lack of meaningful consultation with local residents prior to its submission. Best practice in planning encourages developers to engage proactively with the community to explain their proposals, gather feedback, and address concerns at an early stage. This process ensures that developments are informed by local knowledge and do not come as a surprise to those most affected.

In this instance, my clients and their neighbours were not approached by the developer to discuss the plans before the application was submitted. There has been no opportunity for local residents to provide input, raise objections, or seek clarifications on how the proposed development might impact their properties, access, or quality of life. This lack of transparency and engagement undermines the principles of good planning and community involvement.

Had a proper consultation process been undertaken, residents could have provided valuable insights regarding site constraints, access issues, and the potential impact on neighbouring properties. Instead, the absence of early engagement has resulted in an application that fails to take into account the legitimate concerns of those who will be directly affected.



Finally, due to the importance of this matter, it is also respectfully requested that the application is called in for examination by the Planning Applications Committee.

2.0 SUMMARY GROUNDS OF OBJECTION

The following is a summary of my clients' objection to this speculative proposal for one dwelling:

- i) **The proposal will inflict severe harm on the residential amenity of my clients' property and neighbouring properties through an unacceptable increase in overlooking, overbearing impact, as well as a loss daylight/outlook;**
- ii) **This insensitive development will result in an adverse impact on the character and appearance of the area;**
- iii) **Adverse impact on highway and pedestrian safety;**
- iv) **The development will impact on biodiversity interests at the site;**
- v) **The effect on surface water and foul drainage; and**
- vi) **Party Wall Act.**

3.0 PLANNING POLICY CONTEXT

In August 2026, the Government published the latest version of the National Planning Policy Framework (NPPF). The NPPF sets out the Government's planning policies for England and sets out how they are expected to be applied,

The Development Plan comprises The Wiltshire Core Strategy (adopted Jan 2015) and the Devizes Neighbourhood Plan. The policies that are pertinent to this objection letter are attached at **Appendix A**.



4.0 DETAILED GROUNDS OF OBJECTION

i) Severe harm on neighbour amenity at No.63

Following a review of the latest submitted plans and supporting documentation, my clients remain seriously concerned that the fundamental planning issues identified in their previous objections have not been addressed or satisfactorily resolved. The previous application was withdrawn without these concerns being overcome, and the current proposal does not materially alter the relationship between the proposed dwelling and my clients' property at No. 63, nor does it provide sufficient evidence or justification to demonstrate that the previously identified impacts have been addressed.

The application site immediately adjoins and forms the southern boundary of No. 63. Given the constrained nature of the site, its orientation and its particularly close spatial relationship with my clients' property, the proposed dwelling would constitute an unacceptable overdevelopment of the plot. The dwelling, together with its associated access, parking and hardstanding, is effectively being squeezed into the available land, resulting in a cramped and contrived form of development with insufficient regard to the established spacing, outlook, privacy and amenity enjoyed by the occupiers of No. 63.

The concerns are not limited to any single aspect of the proposal. Rather, it is the cumulative effect of the dwelling's siting, scale, massing, height, orientation and proximity to the boundary that would give rise to significant and unacceptable harm to my clients' residential amenity.

The revised National Planning Policy Framework (NPPF), published in August 2026, places significant emphasis on ensuring that new development is appropriately designed and provides acceptable living conditions. Policy DP3: Key principles for well-designed places requires development proposals to respond positively to the context of the site and its setting, including its character, physical features and the relationship between development plots and buildings.



It requires proposals to integrate with and enhance their surroundings and to provide well-designed places, including in terms of liveability and built form.

The current proposal fails to satisfy these principles. The site has a particular relationship with No. 63, and that relationship cannot reasonably be considered in isolation from the scale and disposition of the proposed dwelling. The proposal would introduce substantial built form immediately alongside the boundary, materially reducing the existing sense of openness and spatial relief and creating a significantly more enclosed and oppressive relationship between the properties.

The scale and massing of the proposed dwelling would result in an overbearing and dominant presence when experienced from No. 63. Its proximity to the boundary, combined with its width, height and roof form, would create a pronounced sense of enclosure and would materially alter the outlook from my clients' property. The proposal would effectively create a tunnelling and terracing effect along the boundary, which is wholly out of keeping with the established relationship between the adjoining properties.

There would also be a material loss of privacy. The proposed orientation and fenestration would introduce direct and oblique views towards private areas of No. 63 and its garden. The close separation distances mean that windows serving habitable rooms would have clear sightlines towards areas which currently benefit from a high degree of privacy. The introduction of a dwelling immediately alongside the boundary would therefore result in an unacceptable perception of overlooking and a significant reduction in the privacy currently enjoyed by my clients.

In addition, the siting of substantial built form directly to the south of No. 63 gives rise to legitimate concerns regarding daylight, sunlight and outlook. The revised Policy P3: Living conditions and pollution of the August 2026 NPPF is directly relevant, providing that development proposals should not give rise to, or contribute to, an unacceptable level of access



to daylight and sunlight for neighbouring residents and occupiers. The policy further requires adverse impacts to be avoided where possible or otherwise mitigated to an acceptable degree.

The latest submission does not provide sufficient technical evidence to demonstrate that the proposed development would avoid unacceptable effects on daylight and sunlight or that the living conditions of the occupiers of No. 63 would be maintained. In particular, no robust assessment has been provided to demonstrate the extent of any impact arising from the proposed dwelling's scale, height and proximity to the boundary.

This omission is particularly significant given the physical constraints of the site and the close relationship between the proposed dwelling and No. 63. The Local Planning Authority should be satisfied, on the basis of appropriate evidence, that the proposal would provide acceptable living conditions for existing as well as future occupiers. The absence of such evidence is material to the assessment of the application.

The proposal must also be considered in terms of the cumulative impact of these individual effects. The loss of privacy, overlooking, increased enclosure, overbearing impact, loss of outlook and potential reduction in daylight and sunlight would combine to materially diminish the quality and enjoyment of my clients' home and garden. These impacts are not capable of being dismissed as minor or incidental consequences of development; together, they represent a substantial and unacceptable deterioration in the existing living conditions at No. 63.

It is clear that the proposal places undue emphasis on maximising the development potential of a constrained plot at the expense of neighbouring amenity.

This is particularly concerning given that the substantive objections raised in relation to the previous application remain unresolved. The latest proposal has not demonstrated any meaningful change in circumstances which would justify reaching a different conclusion. The same fundamental relationship between the application site and No. 63 remains, and the same



underlying concerns regarding overdevelopment, privacy, enclosure, outlook, daylight and sunlight continue to arise.

Accordingly, my clients consider that the proposal fails to respond appropriately to the constraints and context of the site and would result in an unacceptable level of harm to the residential amenity of No. 63. The development is therefore contrary to Policies DP3 and P3 of the National Planning Policy Framework (August 2026) and Core Policy 57(vii) of the Wiltshire Core Strategy, which seeks to ensure that development does not adversely affect neighbouring properties.

ii) Character and Appearance

The concerns previously raised regarding the effect of the development on the character and appearance of the area remain wholly relevant. The latest submission continues to seek to accommodate a substantial dwelling, together with associated parking, access and hardstanding, within a constrained plot immediately adjoining No. 63. The fundamental spatial relationship between the application site and the surrounding properties has not materially changed.

The revised National Planning Policy Framework (NPPF), published in August 2026, places significant emphasis on achieving well-designed places and ensuring that development responds positively to its context. Policy DP3 – Key principles for well-designed places requires proposals to respond to the context of the site, including its history, character and physical features, as well as the character and features of the wider setting. Development should integrate with and enhance its surroundings and should provide well-designed places in terms of, amongst other matters, liveability, built form and identity.

The proposed development fails to respond appropriately to these requirements. The application site currently provides a degree of spatial relief and separation between properties. The proposed dwelling would substantially erode that relationship by introducing built form, access and hardstanding across a significant proportion of the site, leaving only limited



separation distances from the boundaries.

The resulting development would appear cramped and contrived and would erode the established spacious character of the locality. Rather than appearing as a coherent form of infill development which responds to the prevailing pattern of development, the dwelling would appear to have been designed principally to maximise the amount of development capable of being accommodated on the site.

The proposal would also create an unacceptable terracing effect when considered in conjunction with the adjoining properties. Its scale, massing and proximity to No. 63 would give rise to a visually dominant and oppressive form of development which would be inconsistent with the established relationship between buildings in the immediate area.

The extensive amount of built form and hardstanding would further reduce the existing verdant and open character of the site. The cumulative effect would be a significant change in the visual appearance and spatial character of the plot, with insufficient opportunity for meaningful landscaping or an appropriate transition between the proposed dwelling and neighbouring properties.

The proposal therefore fails to demonstrate that the site can accommodate the quantum, scale and form of development proposed without unacceptable harm to local character and visual amenity. The fact that the site is physically capable of accommodating a dwelling does not mean that the particular form of development proposed is appropriate.

Accordingly, the proposal conflicts with Policy DP3 of the NPPF (August 2026) and Core Policy 57(i) of the Wiltshire Core Strategy, which requires development to be of a high quality of design and to reflect the local context, character and distinctiveness of the area.

iii) Highway Safety, Access and Parking

The highway concerns raised in relation to the previous application also remain unresolved. The latest submission has not provided sufficient information to demonstrate that the proposed additional dwelling can be safely accessed, parked and serviced within the constrained site



without creating unacceptable conflict with highway users.

The introduction of an additional dwelling necessarily intensifies the use of the site and its access. Given the restricted dimensions of the plot and the limited space available for parking and manoeuvring, there is a legitimate concern that vehicles may be unable to enter, manoeuvre and leave the site safely without reversing movements onto or close to the public highway.

The application documentation does not adequately demonstrate the practical operation of the proposed parking and access arrangements. In particular, the information provided does not satisfactorily establish that vehicles can enter, park, manoeuvre and exit the site in a safe and convenient manner, nor does it adequately demonstrate that the proposed arrangement would avoid conflict between vehicles, pedestrians and other highway users.

The revised NPPF contains Policy TR6 – Assessing transport impacts, which requires the transport impacts of development to be properly assessed and provides that development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety or, subject to the circumstances identified in the policy, unacceptable residual cumulative impacts on the road network.

The issue in this case is not simply the additional number of vehicle movements generated by one dwelling. It is the ability of the constrained site to safely accommodate those movements, together with the necessary parking and manoeuvring arrangements, without creating an unacceptable highway safety risk.

Where the necessary technical information has not been provided, the Local Planning Authority cannot reasonably conclude that the proposed access and parking arrangement would operate safely. The burden remains on the applicant to demonstrate that the development can be accommodated satisfactorily.

The proposal therefore fails to demonstrate compliance with Policy TR6 of the NPPF (August 2026) and the relevant requirements of Core Policies 57(xiv), 61 and 64 of the Wiltshire Core



Strategy.

iv) Impact on Biodiversity and the Natural Environment

The biodiversity concerns previously raised also remain relevant to the latest proposal. The extent of development proposed would result in a substantial proportion of the site being occupied by the dwelling, access, parking and hardstanding, leaving limited opportunity for meaningful ecological enhancement.

The revised NPPF now contains Policy N2 – Improving the natural environment, which requires development proposals to contribute positively to the natural environment and support nature's recovery. Among other matters, Policy N2 requires proposals to consider the environmental qualities of land proposed for development, identify opportunities for conservation and enhancement, minimise impacts on biodiversity and incorporate features supporting priority or threatened species.

The policy also requires significant harm to biodiversity to be avoided, adequately mitigated or, as a last resort, compensated for, with development refused where such harm cannot be appropriately addressed.

The latest application has not adequately demonstrated how the existing ecological value of the site has been assessed or how biodiversity impacts arising from the proposed development would be avoided and mitigated. Given the intensity of development proposed, there is concern that the loss of existing vegetation and habitat, together with increased domestic activity and artificial lighting, could adversely affect ecological interests associated with the site.

Particular care is required in relation to protected species, including bats and nesting birds, where habitat and foraging opportunities may be affected by the development and associated lighting.

The application should therefore demonstrate, through appropriate ecological information, the existing biodiversity value of the site, the likely impacts of the proposed development and the measures proposed to avoid, mitigate and, where appropriate, compensate for those impacts.



The statutory biodiversity net gain regime must also be properly addressed where applicable. The Government's current biodiversity net gain guidance confirms that local planning authorities should use the relevant BNG requirements and guidance when determining applications.

The proposal should not be permitted on the assumption that biodiversity impacts can be addressed retrospectively by landscaping conditions where the fundamental layout and extent of development leave insufficient opportunity for meaningful ecological enhancement.

Accordingly, the current submission has not demonstrated that the proposal would protect and enhance the natural environment in accordance with Policy N2 of the NPPF (August 2026) and the relevant statutory biodiversity requirements.

v) Foul and Surface Water Drainage

The concerns previously raised regarding drainage have likewise not been satisfactorily resolved.

The intensity of development proposed on this restricted site, together with the extent of hardstanding and other impermeable surfaces, raises concerns regarding the management of surface water and the potential for increased runoff affecting neighbouring land, including No. 63.

The revised NPPF contains specific policies concerning flood risk and sustainable drainage. Policy F8 – Sustainable drainage systems and watercourses requires development proposals which could affect drainage on or around the site to incorporate sustainable drainage systems to control flow rates and reduce runoff, proportionate to the nature and scale of the development. The policy also requires such systems to provide multifunctional benefits wherever possible, including benefits for water quality, biodiversity and amenity.

The current submission does not provide sufficient detail to demonstrate how foul and surface water would be satisfactorily managed over the lifetime of the development. In particular, it has not been demonstrated that the proposed level of hardstanding and built development can be



accommodated without increasing surface water runoff or adversely affecting adjoining land.

Given the close relationship between the application site and No. 63, this is an important consideration. The applicant should demonstrate that an appropriate drainage strategy can be delivered within the site and that surface water will be managed without creating additional risk to neighbouring properties.

The absence of adequate drainage information is therefore a material deficiency in the current application. The Local Planning Authority should not assume that a satisfactory drainage solution can be achieved through a subsequent condition where the physical constraints of the site have not first been properly considered.

The proposal has therefore failed to demonstrate compliance with the relevant requirements of Policy F8 of the NPPF (August 2026) and the applicable development plan policies relating to drainage and flood risk.

vi) Party Wall and Construction Impacts

My clients also reserve their position in relation to any works undertaken close to or upon the shared boundary.

The proposed dwelling is located in close proximity to my clients' property and boundary. Any construction works associated with foundations, excavation, drainage, scaffolding, access or the erection of boundary structures could have implications for No. 63 and its existing structures.

My clients do not consent to any encroachment onto land within their ownership and expressly reserve all rights in relation to the Party Wall etc. Act 1996 and any other applicable private rights.

It is recognised that matters arising under the Party Wall etc. Act 1996 are principally matters of private law rather than planning considerations. However, the very close relationship between the proposed development and No. 63 reinforces the need for the applicant to demonstrate that the development can physically be constructed without unacceptable



consequences for neighbouring property.

The Local Planning Authority is therefore requested to ensure that the development proposed can be accommodated within the applicant's land and that the detailed design does not rely upon access to, encroachment upon, or works affecting my clients' property without their agreement.

5.0 SUMMARY OF HARM

The latest proposal continues to represent an inappropriate and excessive form of development on a constrained site immediately adjoining my clients' property at No. 63.

Importantly, the principal concerns raised in relation to the previous application have not been meaningfully addressed. The current submission does not materially alter the fundamental relationship between the proposed dwelling and No. 63, nor does it provide sufficient evidence to demonstrate that the previously identified impacts have been overcome.

The proposal would result in significant cumulative harm, including:

- an unacceptable loss of privacy and increased overlooking of private areas of No. 63;
- an overbearing and dominant impact arising from the scale, massing and proximity of the proposed dwelling;
- a substantial increase in enclosure and a loss of the existing sense of openness and spatial relief;
- harm to outlook and potential unacceptable impacts on daylight and sunlight;
- a cramped, contrived and visually oppressive form of development which fails to respond appropriately to the character and context of the area;
- an erosion of the established spatial pattern and relationship between neighbouring properties;
- insufficient information to demonstrate that safe access, parking and manoeuvring can



be achieved without unacceptable highway safety implications;

- insufficient information to demonstrate that biodiversity interests and protected species would be adequately protected and that the development would appropriately contribute to the natural environment;
- insufficient information to demonstrate that foul and surface water can be satisfactorily managed without adversely affecting neighbouring land; and
- potential construction-related impacts arising from the extremely close relationship between the proposed development and No. 63.

Taken together, these matters demonstrate that the proposal is not simply a matter of accommodating an additional dwelling within an available parcel of land. The quantum, siting, scale and form of development proposed are fundamentally constrained by the site's relationship with No. 63 and the surrounding built environment.

The proposal therefore fails to demonstrate that the site can accommodate the development without unacceptable harm to neighbouring residential amenity, local character, highway safety and the natural environment.

The development conflicts with the relevant policies of the National Planning Policy Framework (August 2026), including Policies DP3, P3, TR6, N2 and F8, together with the relevant provisions of the Wiltshire Core Strategy, including Core Policies 57, 61 and 64.

In particular, the proposal fails to satisfy the requirement for development to respond appropriately to its context, provide acceptable living conditions for existing and future occupiers, operate safely, protect and enhance the natural environment and satisfactorily address drainage.

The fact that the application is for a single dwelling does not outweigh these site-specific harms. The benefits of providing an additional dwelling must be balanced against the significant and demonstrable adverse impacts identified above.



For these reasons, and given that the substantive concerns raised in relation to the previous application remain unresolved, my clients respectfully request that planning permission be refused.

Yours faithfully

Lloyd Jones MRTPI
Director



Appendix A – Relevant Planning Policies

The Wiltshire Core Strategy (adopted Jan 2015)

- CP1 – Settlement Strategy,
- CP2 – Delivery Strategy,
- CP3 – Infrastructure Requirements,
- CP26 - Spatial Strategy for the Tidworth Community Area,
- CP41 - Sustainable construction and low-carbon energy,
- CP43 – Providing affordable homes,
- CP45 – Meeting Wiltshire’s housing needs,
- CP46 – Meeting the needs of Wiltshire’s vulnerable and older people,
- CP50 – Biodiversity and Geodiversity,
- CP51 – Landscape,
- CP52 – Green Infrastructure,
- CP55 – Air Quality,
- CP57 – Ensuring High Quality Design and Place Shaping,
- CP58 – Ensuring the Conservation of the Historic Environment,
- CP60 – Sustainable Transport,
- CP61 – Transport and New Development,
- CP62 – Development Impacts upon the transport network,
- CP63 – Transport Strategic
- CP64 – Demand Management, and
- CP67 – Flood Risk

Devizes Neighbourhood Plan

- H2 Strategic Policy Intent – Built Environment & Sustainability



- T1 Strategic Policy Intent - Getting Around
- ESD1 Strategic Policy Intent - Environment & Sustainability