

## **Formal Objection by Sutton Benger Parish Council**

### **Planning Application PL/2025/09825: Land at Gate Farm, Sutton Benger – Outline Application for up to 90 Dwellings**

Sutton Benger Parish Council formally objects to the above planning application on the following material planning grounds, having regard to the statutory development plan and all other material considerations.

In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

#### **1. Conflict with the Adopted Neighbourhood Development Plan and Spatial Strategy**

**1.1 The Sutton Benger and Draycot Cerne Neighbourhood Development Plan (NDP) was formally made in March 2025** and therefore forms part of the statutory development plan.

1.2 The NDP confirms that Sutton Benger has no requirement for further housing allocations, having already met its housing needs in line with Wiltshire Council's strategic requirements. This conclusion was reached following extensive consultation and assessment of the village's infrastructure capacity, sustainability and character.

1.3 The proposal is therefore in direct conflict with:

- **Wiltshire Core Strategy Core Policy 1 (Settlement Strategy)**, which directs development to sustainable locations and requires development in Large Villages to be proportionate and infrastructure-led;
- **Core Policy 2 (Delivery Strategy)**, which requires development to accord with the plan-led system; and
- **National Planning Policy Framework (NPPF) paragraphs 13 and 29–30**, which place significant weight on recently made and up-to-date neighbourhood plans.

1.4 Approval of this application would fundamentally undermine the adopted Neighbourhood Development Plan and the integrity of the plan-led system.

#### **2. Housing Saturation and Cumulative Impact**

2.1 Since the adoption of the NDP in March 2025, Sutton Benger has already been subject to substantial additional housing approvals.

**2.2 Sutton Benger Parish Council have calculated the percentage increase in dwellings since the 2011 census and compared this with the English National average. The growth in the number of dwellings in England since 2011 is 16.5%. If this planning application is approved for 90 homes the Sutton Benger housing number in 2011 of 403 dwellings will have grown to 719 dwellings representing a 79.6% increase at 4.8 times the national average. No community is able to absorb this level of growth; it is ridiculous and must be rejected. Please see the associated document showing the details for this calculation.**

2.3 These developments represent a significant and rapid increase in the size of the village. Sutton Benger is now saturated with new housing, and the Parish Council is experiencing increasing difficulty accommodating additional residents and vehicles.

2.4 The proposed development of up to 90 further dwellings would represent a disproportionate and unreasonable scale of growth, contrary to:

- **Core Policy 2**, which requires development to be consistent with strategic and local planning objectives.
- **Core Policy 61 (Transport and New Development)**, which requires cumulative impacts to be acceptable; and
- **NPPF paragraph 110**, which requires development to avoid unacceptable cumulative transport impacts.

2.5 The application fails to adequately assess or mitigate the cumulative effects of recent and consented development on highways, infrastructure and village character.

2.6 The large village status for Sutton Benger belies the lack of services and facilities available, currently the village has no shop, no café and no post office. All residents must travel by car for these services to Christian Malford of The Pitt Stop for local services and Chippenham for larger shops. The addition of 90 more homes with an average 1.5 cars per household adds 135 more vehicles to the already busy local roads.

2.7 Education, Sutton Benger Primary school is run by The Blue Kite Academy. There are currently 165 children on role with a maximum capacity of 210. There are an additional 106 homes already approved that will probably absorb this capacity. The additional 90 for this application and 9 for Land at Arms Farm would over run the capacity of the local school, its facilities and access points causing knock on challenges for the Academy and staff.

### **3. Foul Drainage, Sewerage and Infrastructure Capacity**

3.1 Sutton Benger is served by an ageing foul drainage and sewerage system which is already known to be under significant strain. The Parish Council is aware of existing problems associated with groundwater infiltration, limited hydraulic capacity and localised flooding, particularly during wetter periods.

3.2 The application proposes connection to the existing sewer network but fails to consider that sufficient capacity exists, or that any required upgrades will be delivered prior to occupation.

3.3 This is contrary to:

- **Core Policy 3 (Infrastructure Requirements)**, which requires all necessary infrastructure to be available or deliverable in a timely manner.
- **Core Policy 67 (Flood Risk)**, which requires development not to exacerbate flooding or drainage problems.
- **NPPF paragraphs 173 and 174**, which require development to be supported by appropriate infrastructure and to avoid environmental harm.

3.4 In the absence of secured sewerage improvements, the proposal risks worsening existing drainage problems, to the detriment of residents, public health and the environment.

### **4. Highway Safety, Traffic Volumes and Speeding**

4.1 The Parish Council objects strongly on the grounds of highway safety, traffic volumes and speeding, particularly at the western end of Sutton Benger High Street (B4069), which forms a principal gateway to the village and the proposed development site.

4.2 High Street already experiences exceptionally high traffic volumes. On 22 December 2025, Perry Payne of the Wiltshire and Swindon Road Safety Partnership visited the Chair of Sutton Benger Parish Council to review traffic conditions at this location. During this visit, Mr Payne formally recognised that traffic volumes at the western end of the village are very high for a rural settlement, averaging approximately 180,000 vehicle movements per month.

4.3 In addition to volume, Sutton Benger experiences serious and persistent speeding problems. Data reviewed by the Road Safety Partnership indicates that:

- on average, approximately 160 vehicles per month travel through this section of High Street at speeds exceeding 50mph; and
- the highest recorded speed within the village is 94mph, demonstrating extreme non-compliance with speed limits and a significant risk to public safety.

4.4 As a result of these findings, Mr Payne has confirmed that he will be engaging with Wiltshire Police and Wiltshire Highways to develop measures to address existing traffic speed and safety issues.

4.5 Further evidence of the severity of the problem is demonstrated by the Parish Council's proactive response. Sutton Benger Parish Council commissioned a feasibility study for pedestrian crossings at two locations on the High Street, which was accepted by the Local Highways and Footways Infrastructure Group (LHFIG) on 8 January 2026. This acceptance has triggered an official pedestrian crossing survey.

4.6 The LHFIG decision reflects formal recognition that:

- current traffic volumes and speeds already present a significant risk to pedestrian safety; and
- mitigation is required not only for existing traffic, but also to account for additional vehicle movements from already approved development.

4.7 At the time the feasibility study was accepted, Sutton Benger is already struggling with the planning permission for a further 118 dwellings, the traffic impacts of which have not yet been fully realised. The need for pedestrian crossing assessment at this stage clearly demonstrates that the highway network is already approaching the limits of safe operation.

4.8 The proposed development of up to 90 additional dwellings, accessed at this sensitive western gateway, would:

- significantly increase vehicle movements at a location already subject to unsafe conditions.
- exacerbate existing speeding behaviour.
- increase risk to pedestrians, cyclists and schoolchildren.
- undermine ongoing safety work by LHFIG, Wiltshire Police and Wiltshire Highways.

4.9 The proposal is therefore contrary to:

- **Wiltshire Core Strategy Core Policy 61 (Transport and New Development);**
- **Core Policy 60 (Sustainable Transport);** and
- **NPPF paragraphs 110 and 115**, which require development to avoid unacceptable and severe highway safety impacts.

## 5. Lack of Sustainable Transport and Car Dependency

5.1 Sutton Benger is served by a very limited bus service, with infrequent timetables and restricted destinations that do not provide a realistic alternative to private car use for work, education, healthcare or leisure.

5.2 In addition, cycle routes to and from the village are not safe or suitable for everyday travel, owing to high traffic speeds, narrow carriageways and a lack of continuous cycling infrastructure.

5.3 As a result, residents of the proposed development would be heavily reliant on private vehicles for almost all journeys, directly contrary to:

- **Core Policy 60 (Sustainable Transport);**
- **Core Policy 1 (Settlement Strategy);** and
- **NPPF paragraphs 108 and 110**, which seek to promote sustainable transport choices and reduce car dependency

## 6. Emerging Wiltshire Local Plan

6.1 The Parish Council notes the **emerging Wiltshire Local Plan**, to which limited weight may currently be afforded in accordance with **NPPF paragraph 48**.

6.2 Nevertheless, the emerging plan continues to emphasise directing development to the most sustainable locations, respecting neighbourhood plans, and ensuring infrastructure delivery keeps pace with growth. The proposal runs counter to this direction of travel.

## 8 The loss of rural character of Sutton Benger

**This development would ruin the rural character of the village through.**

- Causing harm to the settlement character and setting.
- The erosion of the rural identity of the village.

- Unacceptable change to the settlement pattern and scale.
- Urbanisation beyond what is planned for the village.

### 8.1. The proposed development fits squarely within the concept of over-development.

- Is completely out of Scale relative to the village size.
- It creates a rate and cumulative growth impact that will be damaging to the current residents
- It consumes open countryside that currently forms part of the rural nature of the village
- It removes the transition between village and countryside.
- It creates an environment that is more urban than rural.

### 8.2. Wiltshire Core Strategy policies that support this objection

#### Core Policy 1 – Settlement Strategy Requires development to be:

- proportionate to the scale and role of the settlement; and
- consistent with maintaining settlement character.

**Key point:** Large villages are **not** intended to absorb unlimited growth. Over-development that alters the character and function of a village is contrary to CP1.

#### Core Policy 2 – Delivery Strategy Requires development to:

- respect the **plan-led approach**; and
- avoid ad-hoc or excessive growth.

**Key point:** This growth which is beyond what is planned for the village equals policy conflict.

#### Core Policy 57 – Ensuring High Quality Design and Place Shaping Requires development to:

- respond positively to the local context.
- maintain the character and identity of settlements; and
- avoid creating an overly urban form in rural locations.

### 8.3. National Planning Policy Framework (NPPF) support

#### NPPF paragraph 130 Requires development to:

- be sympathetic to local character.
- maintain a strong sense of place; and
- avoid poor or incongruous design outcomes

#### NPPF paragraph 174 Protects:

- countryside and landscape character; and
- the intrinsic character and beauty of the countryside

**NPPF paragraph 1** Reinforces the plan-led system and respect for neighbourhood plans.

### 8.5. How this applies *specifically* to Sutton Benger

- Sutton Benger has an adopted NDP (March 2025) stating no further housing is required.
- the village has already absorbed large recent housing growth.
- infrastructure, traffic and services are already under strain; and
- this proposal would represent a step-change in scale and character, not organic growth.

- Erosion of the rural village identity.
- suburbanise the western edge of the village.
- blur the village–countryside transition; and
- cumulatively transform Sutton Benger into a settlement that is materially different in character and function from that envisaged in the NDP.

## **8.6. This proposal represents over-development that would erode the rural character of Sutton Benger.**

*The Parish Council further objects on the grounds that the cumulative scale and rate of development would result in the erosion of Sutton Benger's rural character and village identity. The proposal would represent an over-development of the settlement, extending its built form and suburbanising the western approach, thereby weakening the transition between the village and the surrounding countryside. Note the percentage increase in number of dwellings explained in item 2.2. This development for a further 90 homes would create an increase in dwellings in Sutton Benger of 79.6% since 2011 which is 4.8 times higher than the national average.*

*This would be contrary to Wiltshire Core Strategy Core Policies 1, 2 and 57, which require development to be proportionate to the scale of the settlement and to respond positively to local character, as well as to paragraphs 130 and 174 of the National Planning Policy Framework.*

## **9. Overall Policy Conflict and Conclusion**

9.1 When assessed against the development plan as a whole, the proposal is contrary to:

- **Wiltshire Core Strategy Core Policies 1, 2, 3, 60, 61 and 67;**
- **the Sutton Benger and Draycot Cerne Neighbourhood Development Plan (made March 2025); and**
- **the National Planning Policy Framework, in particular paragraphs 13, 29–30, 108, 110, 115, 173 and 174.**

9.2 The proposal represents an unsustainable, disproportionate and unreasonable further intensification of development in a village that is already saturated with new housing and struggling to accommodate recent growth.

**Sutton Benger Parish Council therefore strongly urges Wiltshire Council to refuse planning permission for application PL/2025/09825.**