

SUMMARY OF S. TILBURY LETTER OF OBJECTION

Why the "we already have permission for six houses anyway" argument doesn't work

The applicant argues that because they already have a Class Q permission to convert one of the barns into six dwellings, the council should approve this scheme as a "better" alternative. The PC's consultant takes this apart:

- A "fallback" planning permission only carries weight if the new scheme is **equally or less harmful** than the fallback.
 - Recent appeal decisions (Roundabout Farm 2023; Stonehall Farm 2025) make this clear.
 - The PC's view: this scheme is **manifestly worse** than the Class Q. Six new-build bungalows on a cul-de-sac with gardens, lighting, vehicles and access road is significantly more intrusive than converting one existing barn within its existing footprint.
 - Therefore the existence of the Class Q is **not a reason to approve** the new application.
 - The fact that the applicant has bothered to apply for this alternative scheme **also suggests they don't actually intend to build the Class Q** as approved.
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Why the "brownfield" claim is wrong

- The applicant repeatedly calls the site "previously developed" or "brownfield."
 - That is **incorrect on the face of national policy** — agricultural land is expressly excluded from the brownfield definition.
 - The applicant themselves admitted during the Class Q process that at least a substantial part of the land was last used for agriculture.
 - There is **no recognised category** of "previously developed agricultural land" — that is something the applicant has invented.
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Why this is the wrong place for new housing

- The site is **outside the settlement boundary** of Braishfield, in open countryside.
- Pucknall is a hamlet of **two principal farmsteads** in working countryside, some distance from the main part of Braishfield.
- It has **no public services, no facilities, no amenities, no shops, no schools, no buses**.

- Residents of any new houses would be **entirely dependent on cars** for every single trip — shopping, school, work, doctor, leisure.
 - That is the **opposite of sustainable development** as defined in the Local Plan and the National Planning Policy Framework.
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Which Local Plan policies the application breaks

The PC's letter cites these specific local policies that the application conflicts with:

- **Policy COM2** (Settlement Hierarchy) — restricts development outside settlement boundaries to limited exceptions, none of which apply.
 - **Policy E1** (High Quality Development) — requires proposals to integrate with and respect the character of the area. This proposal does not.
 - **Policy E2** (Protect, Conserve and Enhance the Landscape) — requires proposals not to harm the landscape character of the area. This proposal does.
 - **Policy T1** (Managing Movement) — requires development to be connected to existing pedestrian, cycle and public transport networks. This site is not.
 - **Policy COM7** (Affordable Housing) — requires a financial contribution equivalent to 20% of Residual Land Value for six dwellings in a designated rural area. The applicant has **not addressed this** at all.
 - The forthcoming new NPPF (consultation December 2025) Policy S5 also restricts development outside settlements.
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What's wrong with the design

- The proposed bungalows are **poorly designed**, with no attempt to make them sympathetic to their setting.
- A cul-de-sac of six new-build dwellings with private gardens would be **completely out of character** with the surrounding countryside and farmsteads.
- The proposed **2-metre acoustic fence** along the western boundary would be visually harmful, with no evidence it has been thought through.
- The proposed predominant boundary treatment (post-and-rail fencing) is at odds with the **Braishfield Village Design Statement**, which calls for soft, hedged boundaries appropriate to a rural setting.
- The applicant has provided **no Landscape Visual Appraisal**, no sectional plans, no proper visualisations — there is no way to properly assess the visual impact from the application material.
- The applicant's only image is a single "Street Scene CGI" with no indication of what view it represents.

Heritage — six listed buildings nearby

- A **high proportion of the buildings in Pucknall hamlet are listed** because of their historic or architectural significance.
- The PC consultant identifies **six listed buildings in close proximity** to the application site.
- The applicant has provided **no Heritage Impact Assessment**.
- It is therefore **not possible to confirm** that the proposal would not harm the setting of these listed buildings — which is a serious gap in the application.

Wildlife and biodiversity — the surveys aren't good enough

- The applicant's own ecologist acknowledges that **"the local area has high value for commuting, roosting and foraging bats."**
- Despite this, **no full bat survey has been carried out** — only a daytime walkover.
- The PC says the council should require a **full bat survey** before the application can proceed.
- The applicant's biodiversity calculations appear to rely on **trees in private gardens** counting toward biodiversity net gain. Natural England guidance does not allow this, because long-term retention of trees in private gardens cannot be guaranteed. The biodiversity matrix should be checked carefully.
- The site is also within **15km of the New Forest SPA**, a protected European site. Six new dwellings would add to recreational pressure on the New Forest. The applicant should be required to assess and mitigate this — they haven't.

What's also missing from the application

The PC's letter identifies that the applicant has provided **no useful supporting information** on a long list of points:

- No Landscape Visual Appraisal.
- No sectional plans or verified visualisations.
- No assessment of visual impact on receptors.
- No lighting impact assessment.
- No Heritage Impact Assessment for six nearby listed buildings.
- No full bat survey.

- No recreational pressure assessment for the New Forest SPA.
- No analysis of how the Braishfield Village Design Statement has been applied.
- No reference to the affordable housing financial contribution required under COM7.

The PC's view: the **onus is on the applicant** to demonstrate that the proposal is acceptable, and they have completely failed to do so.

The PC's bottom line

- The proposed cul-de-sac would be a **suburban intrusion** into a countryside landscape of open fields and agricultural buildings, with **no need or precedent** in Pucknall.
- The dwellings have **no design merit** and have ignored the rural setting and the Braishfield Village Design Statement.
- The harm caused would be **significantly and demonstrably greater** than any benefits — and significantly worse than the existing Class Q permission too.
- The impact on ecology and biodiversity has **not been properly assessed**.
- For all these reasons, the **application should be refused**.