



Joe Richardson
Senior Planning Officer
Wiltshire Council
Monkton Park Offices
Monkton Hill
Chippenham
SN15 1ER

13th February 2025

Ref. SP22-1068

Dear Mr Richardson,

**Addendum to Planning Statement and response to consultation comments
Outline Planning Application for Residential Development (Ref: PL/2024/09976)
Land at Southampton and Junction Road, Alderbury**

Following the submission of the above planning application, we wish to provide an Addendum to the original Planning Statement, to discuss the implications of recent changes to national and local planning policy, and the influence this will have on the Council's assessment of the planning application. In addition, we also provide a response to the Parish Council and neighbour comments received through the public consultation process.

Whilst we note that a number of statutory consultation comments have also been received, separate technical responses are being prepared to address these matters individually.

Planning Policy Context

Following the submission of this planning application, there have been some significant changes to the planning policy context that should be considered in the assessment of these proposals. These changes include the publication of a revised version of the NPPF (12th December 2024) and the submission of the Wiltshire Local Plan for examination on 28th November 2024. These policy changes, along with the implications for the assessment of this application will be considered in greater detail below.

Revised NPPF December 2024

At the time of submitting this planning application, the Government had commenced a consultation process on a revised version of the NPPF. The proposed consultation document was considered within the original Planning Statement, but limited weight could be afforded to the proposed changes at that stage.

On 12th December 2024, the Government published a revised version of the National Planning Policy Framework (NPPF), bringing forward a number of changes that were included within the earlier consultation process. The revised NPPF now holds full weight and is a material consideration in the assessment of this planning application.

Housing Land Supply & Local Housing Need

One of the most significant changes included within the revised NPPF is the deletion of the 4-year housing land supply requirement, where Local Planning Authorities had an 'advanced local plan'. This reduced 4-year

requirement was introduced by the December 2023 NPPF update and was relevant to Wiltshire, as their Local Plan review had reached an advanced stage at that time (beyond Regulation 18 Stage).

At the point of submitting this planning application, the December 2023 NPPF was the adopted version of the NPPF and so formed a key material consideration in decision making for planning applications. This required that Wiltshire only needed to demonstrate a 4 year, rather than a 5-year supply of housing land. Whilst there was still some debate over whether this could be achieved, Wiltshire's position was nevertheless significantly strengthened against the reduced requirement.

Following the publication of the new NPPF in December 2024 the NPPF was revised to remove the 4-year housing land requirement. Paragraph 78 of the NPPF (December 2024) requires the Council to maintain a five-year housing land supply and as the Council's Strategic Housing Policies were adopted more than five years ago, the housing land supply is required to be maintained against the identified local housing need.

In addition, the new NPPF and accompanying Planning Practice Guidance has introduced a 'New Standard Method' for calculating local housing need. For Wiltshire, the new housing need figure is 3,525 dwellings per annum, which is significantly larger than the previous 1,917 dwellings per annum, calculated under the previous standard method.

In addition, the Council is also required to include a 5% buffer to ensure choice and competition in the market for land, as required under Paragraph 78 of the NPPF. Once the buffer has been applied and using the currently identified supply of 8,193 dwellings (published June 2024) there is little doubt that Wiltshire are significantly short of achieving their required 5 year housing land supply requirement.

A recent appeal decision for new housing within Wiltshire (Appeal Ref: APP/Y3940/W/24/3345598) was issued on 21st January 2025. This is attached at **Document 1**, and is the most recent assessment of the Council's housing land supply against the 2024 NPPF. The Inspector notes at paragraph 6, that the Council agreed that they can only demonstrate **2.03 years'** supply of housing, against their 5-year requirement.

In light of this substantial shortfall, the tilted balance in favour of sustainable development is now engaged for the purposes of assessing this planning application, in accordance with Paragraph 11 d) of the NPPF. This means that planning permission should only be refused if the adverse impacts of the development significantly and demonstrably outweigh its benefits.

As confirmed within 'Hopkin Homes & Cheshire East' Supreme Court judgements, the extent of the shortfall is material to the level of weight which should be placed on the material benefit arising from addressing this shortfall.

In the original Planning Statement we placed Significant weight on the social benefits arising from the provision of open market housing and Very Significant weight on the social benefits arising from the provision of affordable housing. However, in light of the declining housing market position, we consider that very significant weight must also be afforded to the provision of open market housing, due to the significant lack of housing land supply which the Council current has to address.

Wiltshire Local Plan Review

At the time of submitting this planning application, the Wiltshire Local Plan had reached an advanced stage of preparation and was expected to be submitted to the Secretary of State in late 2024. The Wiltshire Local Plan Review has been prepared using the previous housing need calculations, which, as discussed above, provided for a significantly lower housing need than required by the new NPPF's 'New Standard Method'.

On 28th November 2024, the Wiltshire Local Plan was submitted for examination to the Secretary of State. The Local Plan has identified a housing need of 36,740 homes (2,041 dwellings per annum)(calculated using the 2023 NPPF standard method).

Whilst this housing need figure falls significantly below the 2024 NPPF housing need calculation, transitional arrangements have been provided for within the December 2024 NPPF, where local plans are being advanced during this period.

These arrangements sets out that where a new Local Plan has been submitted for examination before 12th March 2025, it will be assessed for soundness against the December 2023 NPPF, and not the revised December 2024 version.

The submitted local plan, therefore, meets a housing need against the old version of the NPPF, which follows an acceptable approach outlined in the NPPF. However, until the Plan is examined, and found to be sound, the emerging Local Plan, which plans for a far reduced housing need than is required by the new NPPF, holds very limited weight in the assessment of this application.

Any application must be considered under the 2024 Local Housing Need until such time as the emerging Local Plan reaches point of adoption. The Council's timescales for adoption of the Local Plan are very optimistic at best. Having reviewed the latest evidence from the Planning Inspectorate, no plans found sound and adopted in 2024 were adopted within one year of submission for examination and the average time was over two years.

Therefore, we consider that there is very limited possibility that the emerging Local Plan would be far enough advanced by the time of decision making for this application for the housing need in the emerging plan to carry sufficient weight to be a material consideration in the determination of this application.

Summary on Policy Position

On the basis of the above, assuming the highly likely scenario that this application is determined prior to the adoption of the new Local Plan, the housing need for the area is set by the New Standard Method included within the NPPF 2024.

As confirmed by the recent appeal decision at Westbury, the Council agree that they can only demonstrate a 2.03 housing land supply, against the 5-year requirement. This places the Council at a significant shortfall in their housing provision, and the tilted balance in favour of sustainable development would therefore be engaged in the determination of this application.

The resultant outcome is that the Council must place further weight on the benefit arising from the delivery of housing. To date, the consultation responses from various internal and external consultees have raised no significant concerns that cannot be addressed via the submission of additional information and further supporting technical evidence.

As outlined in our planning statement, we consider that the only adverse impacts arising from the development would be the conflict with the spatial strategy and some landscape harm. However, the Council's Landscape Officer has raised no concern in this regard. As such, we consider that it would be illogical for the Council to conclude that the adverse impacts arising from the conflict with the spatial strategy alone would significantly and demonstrably outweigh the benefits of the development, when assessed against a backdrop of only 2.03 years housing land supply.

We consider that once the correct mechanisms for determining this application, as enshrined within the NPPF, are applied to this application, that the outcome of the balancing exercise under paragraph 11 d) should be the granting of planning permission for this development.

Consultation Responses

Alderbury Parish Council

Alderbury Parish Council submitted comments in response to this application on 12th December 2024. Their letter states that the Parish Council object to this application, whilst noting that there are several aspects of the application which are supported. These positive elements include:

- The retention of the allotments and improvement to these facilities to support their continued use;
- The provision of on-site environmental mitigation;
- Inclusion of significant areas of open green space;
- The proposed mix of houses, which responds to specific local needs for single-level properties and smaller homes.

The applicants have sought to work closely with Alderbury Parish Council throughout this application process and we therefore seek to respond to matters raised within their consultation response below.

Site outside of Alderbury Settlement Boundary

The Parish Council raise an in-principle objection to the application, as the site is located outside of the defined settlement boundary for Alderbury. The application site is an undeveloped field and is classed as 'open countryside'. However, the site is surrounded by existing housing development on three of its edges. This existing development also echoes the position of the development boundary for the settlement, which effectively borders the application side on three sides.

Whilst it is clear that the site sits outside of the defined boundary at present, we consider that, due to the proximity to the development boundary, the site benefits from the same accessibility and connectivity within the settlement as those areas within the defined boundary. On this basis, development on this site will be viewed within the context of the existing settlement and not as an isolated parcel of land within the open countryside.

In terms of the need for additional housing, Alderbury is identified as a Large Village within the Wiltshire Core Strategy, regarded as a sustainable settlement, and a location for development growth to meet the needs of the settlement.

In light of Wiltshire Council's inability to provide anywhere close to the required levels of housing land, additional sites need to be considered for housing development outside of the identified settlement limits. On this basis, the provision of sympathetic residential developments on sites that are well connected to, and accessible within sustainable settlements should be considered positively, in order to boost the delivery of housing within Wiltshire.

Impact on Neighbouring properties

The Parish Council have queried the impact of the proposed development on some existing neighbouring properties, in particular 'Copper Beech End' at Junction and existing houses on Oakwood Grove.

This application is submitted in Outline form, with details of layout and design being reserved for future assessment. The indicative layout that accompanies the application shows a potential layout option that could be achieved.

This has had regard to appropriate separation distances between existing dwellings, to maintain privacy and outlook. Whilst the impact of development on private views is not a matter that should influence the planning process, the detailed design of the properties themselves, and their positioning within the site will be fully considered as part of any subsequent reserved matters application, to minimise disturbance and impact on neighbours.

Flood Risk

The existing site conditions and vulnerability to surface water flood risk have been a key matter for consideration as part of this planning application. The application is supported by a Flood Risk Assessment and Drainage Strategy, which has also been updated to address comments raised by the Lead Local Flood Authority (LLFA).

This drainage strategy has included a variety of sustainable drainage techniques, such as the installation of a hydro-brake chamber, detention basin, attenuation tank and permeable paving across the site, to ensure that surface water will be intercepted, contained and released at an appropriate rate, to prevent flooding on the site itself or in downstream locations. This will ensure the water which falls within the site would be retained and released at a slower rate than the current greenfield run-off rate, meaning an enhanced drainage solution compared to the existing would be achieved.

Traffic

The application has been considered by both Wiltshire Highways and National Highways, where the individual traffic impact of this site, along with the cumulative traffic impact of other recent developments have been assessed. There has been no objection raised to the proposals from a highway perspective and the impact of the development, in terms of traffic generation, on the local highway network is not considered to be harmful.

As part of the public consultation event, it was suggested that a safe-walking route be provided from Clarendon Road, through the application site onto Junction Road and through the Firs Road development to the primary school. This was addressed in paragraph 6.75 and 6.76 of the Planning Statement, as this unfortunately isn't deliverable due to ecological and legal access issues.

Neighbour Consultation Responses

A total of 39 neighbour comments have been received in connection with this application. Some of these raise similar points to those covered above, others have been considered below:

Principle of Development

Concerns have been raised by some of the locals in relation to Alderbury not having sufficient infrastructure and facilities to support more housing. As discussed above, Alderbury is a sustainable settlement and considered suitable for development growth. In terms of ensuring that suitable infrastructure is available to support the development, the applicants have agreed to make appropriate financial contributions towards a range of local improvements. These include contributions towards education provision; waste management processes; and pedestrian connectivity within the village. These payments will be secured via a signed legal agreement to help

ensure that infrastructure and facilities within Alderbury are suitable to accommodate the additional 47 dwellings proposed by this application.

Flooding

Similar to the matter raised by the Parish Council, local residents have raised the matter of surface water flooding on the site, and have concerns about how this will be managed. As discussed above, the application has been accompanied by a site specific Flood Risk Assessment and has proposed a detailed drainage strategy to accommodate surface water within the site.

A number of sustainable drainage systems (SuDS) have been provided, to help intercept, attenuate and manage the discharge of surface water from the site. This will ensure that the site itself is not vulnerable to flooding and flood risk downstream is not exacerbated or created by these proposals.

Amenity

There have been a number of individual objections to the proposed development on the basis of the impact on existing homes. The main concerns relate to loss of privacy, overlooking, loss of daylight, loss of views and noise and pollution.

As explained above, the application is submitted in Outline form, where the details design and layout are yet to be agreed. The indicative layout does maintain separation distances to neighbouring properties in accordance with the Council's adopted standards, to avoid any unacceptable impact to residential amenity of these adjoining occupiers. However, this is a matter for further consideration as part of any reserved matters application.

In terms of noise impact and pollution caused by the proposed development, this application has been supported by a Noise Assessment and Air Quality Assessment, which do not raise any matters of concern that would suggest that the introduction of 47 dwellings in this location would be harmful to existing neighbours as a result of noise or pollution issues.

Ecology

Whilst the loss of an existing green field to provide residential development is inevitably going to result in a change to the biodiversity value of the site, this application has been landscape-led and maintains key existing landscape features, incorporates large areas of green space, and looks to provide ecological enhancements where possible. The application will achieve the required 10% biodiversity net gain, by both on-site measures and off-site contributions.

The application has been supported by a Preliminary Ecological Appraisal, which provides a thorough assessment of the ecological value of the site. Feedback is awaited from the Council's Ecology Officer in relation to the ecological impact of the proposals. A separate response will be provided, if required, once these comments have been provided.

Highways and Traffic

As discussed above, the application has been considered by both National Highways, in relation to the impact on the trunk road network (A36) and Wiltshire Highways, in response to local highways matters. There has been no objection raised in relation to the principle of an additional 47 dwellings and any concerns about the resulting

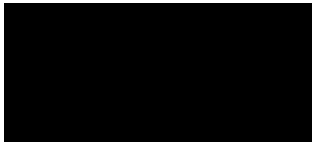
impact on the highway network. Additional enhancement measures have been requested, to support non-car travel, which will be secured via a legal agreement.

Landscape

The application proposes a sympathetic development for this edge-of-village location. The proposals retain all but one existing tree, allowing the established planting to form a key feature within the new development. Comments received from the Council's Landscape Officer confirm that the site is well-contained visually within the landscape and the conservation and enhancements proposed within the scheme will provide a pleasant environment for new housing.

We request that this letter is appended to the online application file and taken into account during the assessment of the proposals. Should you wish to discuss any specific topic raised within this letter further, please don't hesitate to contact me.

Yours sincerely,



Anna Brindle

Associate

Enc.