



PLANNING, DESIGN & ACCESS STATEMENT

On behalf of: Ms P Browning

Site: Land in East Grafton (to the north of the A338), East Grafton, Wiltshire SN8 3DB (Easting: 425416 – Northing: 160569)

Proposal: Erection of 1 no. new dwelling with associated access, parking, landscaping and private amenity space.

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1. Introduction

- 1.1 This Statement has been prepared by Fowler Architecture & Planning Ltd in relation to the submission of a Full Planning Application by Ms P Browning to Wiltshire Council for the *'Erection of 1 no. new dwelling with associated access, parking, landscaping and private amenity space'* at Land in East Grafton.
- 1.2 The purpose of Section 5 of this Statement is to provide an assessment of the proposal having regard to the development plan and other material considerations.

2. Site Description

- 2.1 The application site falls within the Parish of Grafton, in the western part of the village of East Grafton.
- 2.2 The site is broadly rectangular, and comprises vacant grassland that extends to 0.21ha. With regards to topography, the development site is flat.
- 2.3 The site is sandwiched between residential properties to the east and west. To the north of the site lies agricultural land, and to the south lies other dwellings to the south of the A338.
- 2.4 An existing access point runs through the site to the eastern side, leading to the agricultural land to the north of the site (within the applicant's ownership).
- 2.5 The site is accessed from the south, off the A338, which is the main throughfare through the village. The nearest public right of way is footpath GRAF6, which lies some 115m to the south of the site.
- 2.6 The site falls outside, but adjacent to, the East Grafton Conservation Area, and is washed over by the North Wessex Downs National Landscape (formally the AONB).
- 2.7 The nearest listed buildings lie around 130m to the east of the site.
- 2.8 The site is not subject to any tree preservation orders, and does not fall in an area that is known to be at risk of flooding.

3. Planning History

- 3.1 A pre-application enquiry (ENQ/2024/01201) was submitted to the Council in August 2024 to explore the acceptability of the *'erection of 9 no. dwellings with associated access, parking, landscaping and private amenity space'* on Land in East Grafton.
- 3.2 The proposed 9 no. units were proposed on the application site, and the adjacent paddock (which is under separate ownership).
- 3.3 A site meeting was held with the planning officer, and the response was received on the 26 March 2025. A summary of the pre-app response is as follows:
- The erection of 9 no. dwellings would likely be considered to exceed the limits of what could be considered infill development.
 - The Council cannot demonstrate the requisite five-year housing land supply and can demonstrate a 2.03 years supply.
 - The visual appearance of the development should be informed by its local context, using scales, forms and materials suitable for the area.
 - It was suggested that a heritage statement should be submitted with any follow up application.
 - It was suggested that flood risk / groundwater flooding and drainage information should be submitted with any follow up application.
 - It was suggested that ecological information should be submitted with any follow up application.
 - In highways terms, a more cohesive scheme was recommended, which includes provision for a footway across the site frontage to provide some connectivity to the main part of the village and its services.

4. Proposed Development

- 4.1 The proposed development is for the *'Erection of 1 no. new dwelling with associated access, parking, landscaping and private amenity space'*.
- 4.2 The dwelling will be located centrally within the site, with its principal elevation facing south.
- 4.3 The dwelling will be 2-storey, with a single-storey lean to located to the east elevation. A single-storey, three-bay garage will be located to the south of the dwelling (to the front of the site), with the principal elevation facing east.
- 4.4 The proposed dimensions for the new dwelling are as follows: a main plan width of 15.1m, a main plan depth of 8m, with a height of 6m to the eaves and 8.9m to the ridge. The two-storey rear extension will measure 5.9m by 5.6m with a height of 5.6m to the eaves and 8.4m to the ridge. The single-storey lean-to extension measures 4m by 5.5m with a height of 4.7m.
- 4.5 The dwelling is proposed to be constructed brick under a clay plain tile roof. The windows will be painted timber with brick arched headers and stone cills. An entrance canopy will be located to the south elevation.
- 4.6 The proposed garage will measure 9.7m by 6.7m with a height of 2.5m to the eaves and 5m to the ridge. The materials will be a brick plinth with oak posts and timber weatherboarding under a clay plain tile roof – to match the proposed house.
- 4.7 The proposed dwelling has a total GIA of 274sqm, while the garage measures 54sqm (GIA).
- 4.8 The existing site access will be altered to serve the proposed development and to meet highways standards and to ensure the access provides a perpendicular approach with the A338. A new access point will be created from the existing track to serve the new dwelling. In addition, a rumble strip will be installed on the existing track – creating a separate, but maintained, access to the fields beyond. Two garage spaces are proposed, with additional parking and turning space available within the site.

5. Planning Policy

- 5.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) states that in dealing with an application for planning permission the LPA shall have regard to the provisions of the development plan, so far as material to the application; any local finance considerations, so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 5.2 For the purpose of this application, the development plan includes the **Wiltshire Core Strategy (CS)** adopted January 2015 covering the period 2006 to 2026, and retained saved policies (not deleted by the adoption of the CS) of the **Kennet District Local Plan 2011 (LP)** adopted in 2004.
- 5.3 The policies of the LP that are considered most relevant to this pre-application enquiry are listed below:
- CP1: Spatial Strategy
 - CP2: Delivery Strategy
 - CP18: Pewsey Community Area
 - CP51: Landscape
 - CP57: Ensuring High Quality Design and Place Making
 - CP58: Ensuring Conservation of the Historic Environment
 - CP60: Sustainable Transport
- 5.4 In terms of Neighbourhood Planning, the Parish of Grafton has been designated as a neighbourhood area (March 2022), but the plan remains at a developing stage. The **Draft Grafton Parish Neighbourhood Plan 2025-2040 (NP)** was issued in May 2025, and is a consideration to the determination of this application.

- 5.5 Policy 1 of the NP outlines the proposed sites for allocation within the NP period to address the needs and aspirations of the local community. The Land west of Grafton Place is allocated under Policy 1b for the development of up to 8no. dwellings – comprising both the application site, and the adjacent land to the east.
- 5.6 The NP confirms that the parcel of land is well-related to the built form of the settlement and would represent an appropriate infill opportunity, consolidation development along the A338 while not extending the village.
- 5.7 The Government’s policies are within the revised **National Planning Policy Framework** (the Framework) published December 2024 that describes how the planning system should achieve sustainable development and when the presumption in favour of sustainable development is engaged. The **Planning Practice Guidance** (PPG) provides further interpretation of the policies of the Framework.

6. Planning Statement

Principle of Development

- 6.1 Policy CP1 'Settlement Strategy' identifies the settlements where sustainable development will take place to improve the lives of all those who live and work in Wiltshire. It identifies a four-tier settlement hierarchy involving, in descending order, Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages.
- 6.2 East Grafton is designated as a 'Small Village,' in the lowest tier of settlements, as defined by Policy CP18 'Spatial Strategy: Pewsey Community Area' (PCA) where it states development should be in accordance with the settlement strategy set out in Policy CP1. Policy CP1 states that: *'Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities'*.

Housing Land Supply

- 6.3 The LPA's latest Housing Land Supply Statement confirms that the Council has just 2.4 years of housing supply against its requirement – this represents a substantial shortfall. The LPAs development plan policies relating to housing delivery are therefore considered out of date accordingly.
- 6.4 Planning applications will therefore be considered in line with paragraph 11 of the NPPF which states that where relevant policies are considered out of date permission will be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a "strong reason" for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. The only locations where this position would not apply is in locations with recently made Neighbourhood Plans that allocate land for housing. Paragraph 14 of the Framework advises that 'in situations where the presumption (at paragraph 11d) applied to applications involving

the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply: (a) the neighbourhood plan became part of the development plan five year or less before the date on which the decision is made'. In this case, the Parish of East Grafton are in the process of preparing their NP. The plan is current in draft form - therefore this does not apply.

- 6.5 As set out below, development of up to 1no. dwelling on this site would not lead to any unacceptable harm in terms of landscape and scenic beauty, heritage impacts, or any other specific technical issues. Paragraph 11d(i) of the Framework is therefore satisfied accordingly.
- 6.6 Paragraph 11 of the Framework goes on to state that proposals should only be refused if the adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. Decisions should also apply a presumption in favour of sustainable development, which can be achieved through three dimensions defined in Paragraph 8 as: economic, social and environmental.

The site is not isolated

- 6.7 While the site is located outside of any defined settlement policy boundary, it is not isolated within the meaning of the Framework.
- 6.8 The site is located to the west of East Grafton, adjacent to the existing residential development of Park Cottage and Tuesley, Grafton Place. The site is therefore within the built-up area of the village, with residential development to the east and west, as well as to the south, on the opposite side of the A338 – as confirmed within the Draft NP.
- 6.9 The village itself has a varied form of development, with a mix of frontage development along the A338 to the east, and cul-de-sac developments further east and north. Additionally, the plot and dwelling sizes within East Grafton vary significantly, there are a number of dwellings set within large plots and set back some distance from the road, while others comprise of smaller dwellings, either detached or semi-detached still with decent size amenity space.

- 6.10 As such, 1no. new dwelling on this site is considered to correctly respond to this existing character and form of the settlement.
- 6.11 The proposed development would infill a gap in the built-up area, respecting the existing pattern and character of development in the village. The Site relates to and forms part of the village, utilising an existing area of unused land that sits between existing residential properties. Consequently, the proposed development would not elongate the village or impose development in sensitive landscape areas.
- 6.12 It is considered that the principle of development is acceptable, and the provision of 1 no. new dwelling would make a small contribution to housing supply within the Borough. It would also add to the stock of this size of home in line with the objectives of the Framework.
- 6.13 In addition, the site is allocated (in conjunction with the land to the east of the site) for up to 8no. dwellings. It is considered that the site can comfortably accommodate the proposed 1no. dwellings and is a suitable form of development.
- 6.14 In summary, there is inherent logic for determining this site is within the built area of East Grafton. It forms part of the physical fabric of the village, adjacent to existing residential dwellings to the immediate east and west. The pattern of development is compatible with the existing form of the settlement, which is varied and contains a number of cul-de-sac developments to the western side of the village. The proposed development would fit comfortably within this site.

Delivering Sustainable Development

- 6.15 A key objective of the Framework is to support the government's objective of significantly boosting the supply of homes. Support for the development is outlined at paragraph 70 of the Framework that confirms small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly – especially at a time when Local Planning Authorities cannot deliver a sufficient supply of housing.
- 6.16 The application proposal is not considered to give rise to any adverse impacts which would significantly and demonstrably outweigh the benefits.

- 6.17 As noted above, Wiltshire Council can only currently demonstrate 2.4 years of housing supply. Consequently, Development Plan policies relating to housing delivery are to be considered out of date. These are the policies most important for determining the planning application, and instead, planning applications should be considered in line with paragraph 11 of the Framework.
- 6.18 First, in terms of landscape, the site falls within the North Wessex Downs National Landscape. The proposed development is for the erection of up to 1no. dwellings. In this case, there are a number of existing dwellings within close proximity to the site, so 1no. new dwelling in this location would not be seen as unusual. The Application site is not located in an isolated location, and it is not considered that the proposed development would be a harmful addition to the character and appearance of the locality.
- 6.19 In terms of designated habitats, there are no recorded habitats relating to the site or on land immediately adjacent. Biodiversity is considered in more detail in the below sections.
- 6.20 In terms of heritage impacts, the site falls within the East Grafton Conservation Area. A heritage statement has been prepared by Forum Heritage Services in support of this application and is considered in more detail in the below sections.
- 6.21 To summarise, there are no specific adverse impacts in terms of landscape, habitats and heritage, and as such the benefits of the application proposal would clearly outweigh any harm caused.
- 6.22 In respect of the scale of the proposed development, the following section on character and appearance describes how the scale has been informed by the local context in accordance with Policy CP57. In this regard it is important to note the following matters:
- The site is located adjacent to established residential development, and comprises a small paddock which is considered to be a logical location for a new dwelling within the built-up area;
 - The presence of established and mature screening to the boundaries ensuring the site is well-contained with the capacity to accommodate change;

- The style and appearance of the proposed dwelling is not dissimilar to existing dwellings within the locality.
- The scale of the proposed dwelling would be in proportion to its plot and would not appear cramped with appropriate separation distances to boundaries.

Character and Appearance

- 6.23 Policy E1 states *‘A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality’.*
- 6.24 The proposed dwelling has been designed to be of a traditional form, and will be constructed from traditional local materials – being finished in brick under a clay tile roof – which accords with the high-quality design requirements of the CS. The single-storey garage element will also be constructed from brick and timber cladding, with a clay tile roof, to ensure consistency.
- 6.25 The Framework at paragraph 131 confirms the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. It continues at paragraph 157 to confirm the planning system should support the transition to a low carbon future in a changing climate.
- 6.26 As part of this current planning application, consideration has been given to the planning officer’s comments within pre-application response ENQ/2024/01201, and the scheme has been amended to ensure its design is in keeping with the local context of East Grafton.
- 6.27 The proposed dwelling would be in keeping with the other dwellings in the locality – located centrally within the site – having been designed to ensure it is consistent in design terms as the existing dwellings within the locality.
- 6.28 The proposed garage will be located to the front of the site, beyond the existing 2m high hedgerow. The garage is of a low level, and will not have an impact on the character of the area.

- 6.29 It is considered that the development would have no adverse impact upon the local character and would not harm the significance of the surrounding locality and landscape.
- 6.30 In relation to residential amenity, the proposed dwelling will be provided with an adequately sized garden to the north of the site. The site is bound by an existing hedgerow, which will be supplemented to with additional native hedgerows to both the north and east of the site.
- 6.31 The relationship of the proposed dwelling to existing and neighbouring properties follows established amenity and separation distance principles.
- 6.32 The application site is large enough to accommodate the proposed new dwelling and garage, and is considered to be in full accordance with Policy CP57.

Highways

- 6.33 Policy CP61 advises that new development should be located and designed to reduce the need to travel, while CP62 advises that developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network.
- 6.34 A Transport Statement has been prepared by Condon Transport Ltd to support this application. The key findings are as follows:
- **Site Access:** A new vehicular access is proposed via realignment of the existing agricultural gateway. The access will be constructed as a 4.8-metre-wide shared surface crossover and will provide suitable visibility splays of 2.4m x 43m in accordance with the 30mph speed limit on the A338. A Stage 1 Road Safety Audit has been undertaken and did not raise any issues relating to the proposed access arrangements or the proximity of junctions.
 - **Junction Spacing:** The proposed new access junctions and the existing Grafton Place junction are spaced approximately 35 metres apart. While relatively close, this is considered acceptable in the local context and in light of Manual for Streets guidance, which encourages a context-led approach. The Road Safety Audit raised no concerns in this regard.

- **Traffic Impact:** Trip generation forecasts prepared using the TRICS database indicate that the proposed development (Site A) will generate negligible vehicle movements—around 1 to 2 way trips during peak hours and around 5 daily trips. Cumulatively, both sites (up to five dwellings) would generate approximately 26 two-way trips per day. This is not considered to have any material impact on the operation or safety of the local highway network.
- **Parking and Servicing:** On-site parking will be provided in line with Wiltshire Council’s Car Parking Strategy, including provision for cycles, motorcycles, and electric vehicle charging where appropriate.
- **Sustainable Transport Opportunities:** While East Grafton is a rural settlement, it benefits from a range of sustainable transport options, including:
 - The Wiltshire Connect demand-responsive bus service offering flexible, bookable connections to Marlborough, Pewsey, and Hungerford;
 - Limited fixed-route bus services (Route 211);
 - A local network of Public Rights of Way and proximity to National Cycle Route 4;
- **Policy Alignment:** The development aligns with national policy set out in the NPPF and local policy objectives in the Wiltshire Local Transport Plan and the emerging Grafton Parish Neighbourhood Plan. These policies support small-scale rural development and promote active and sustainable travel choices.

6.35 The report concludes that the proposed development represents a small-scale, sustainable form of growth that is appropriately integrated into the local highway and transport context. The development can be safely accessed, generates minimal traffic impact, and is supported by a range of sustainable transport options.

Ecology

6.36 Policy CP50 of the CS states that ‘Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term’.

6.37 An Ecological Assessment has been undertaken by ABR Ecology Ltd. The habitats on site were deemed to be of limited value and have limited potential to support protected or notable species.

6.38 The following species/groups are either present or potentially present and the recommended actions are as follows:

- Habitats – the on-site habitats include modified grassland and a species native rich hedgerow along the southern boundary. No priority habitats were recorded. No anticipated impacts to the existing habitats.
- Badgers – badgers have been recorded within the local area. A badger mitigation strategy is detailed within Section 4 of the Ecological Assessment.
- Barn Owls – barn owls are not considered to be impacted by the proposals and no further action is recommended.
- Bats – there are no trees or buildings on the site. The site is deemed to hold ‘negligible potential’ for roosting bats due to a lack of suitable potential roosting features. Therefore, no impact on roosting bats are anticipated.
- Dormice – the hedgerow along the southern boundary holds limited potential for dormice. The risk of encountering a dormouse is considered to be low. A method statement for vegetation clearance and a hedge protection plan is detailed in Section 4 of the Ecological Assessment.
- Great Crested Newts – the site features limited potential for GCN. A precautionary method statement for vegetation clearance is detailed in Section 4 of the Ecological Assessment.
- Nesting Birds – there is potential for nesting birds to be present within the hedgerow on-site. Mitigation for nesting birds is detailed in Section 4 of the Ecological Assessment.
- Hedgehogs – hedgehogs have been recorded within the local area, and the site consists of suitable habitat for this species. A mitigation strategy is detailed in Section 4 of the Ecological Assessment.
- Reptiles and common amphibians – the hedgerow along the southern boundary and grassland on the western and northern side of the site holds limited potential for

reptiles and amphibians. A method statement for vegetation clearance is detailed in Section 4 of the Ecological Assessment.

6.39 It is considered that the proposed development can be sufficiently undertaken in full accordance with Policy CP50 – with no harm to the biodiversity of the site.

Flood Risk

6.40 The site in East Grafton lies wholly within Flood Zone 1 – with a low risk of surface water flooding.

6.41 The site however, does lie within an area at risk of Groundwater Flooding – as noted on the Wiltshire Council Strategic Flood Mapping system.

6.42 With this in mind, a Flood Risk Assessment and Drainage Strategy has been instructed by the applicant, and will be submitted in due course.

Heritage

6.43 Policy CP58 relates to heritage. The policy states *‘Development should protect, conserve and where possible enhance the historic environment’*.

6.44 The site is located outside, but adjacent to, the East Grafton Conservation Area. The Conservation Area was first designated in 1974, and subsequently amended in March with the publication of the Conservation Area Statement.

6.45 A Heritage Statement has been prepared by Forum Heritage Service and is submitted in support of this application. The Statement advises the following:

- The site lies to the north of the north-western part of the East Grafton Conservation Area.
- The Conservation Area is primarily of significance because of the special character of The Green and the cluster of houses, farms and church that fringe this open area of common.

- Approaching East Grafton from the west, there is little opportunity to recognise that one is entering a conservation area, although it is evident that one is approaching a settlement due to the visibility of the mainly modern housing.
- There will be no impact on the ability to experience the designated area, or to be able to understand or appreciate its significance.
- The rural setting to the north of the road adds little to the heritage value of the adjacent part of the conservation area.
- Accepting that settlements grow and change, the proposed site to the north of the A338 offer a location where there will be no harm to the special interest of the important area of The Green and its numerous listed buildings.
- There are no views of significance into or out of the conservation area that will be impacted by the development of this area, and the proposal will allow a moderate level of growth in the village which will balance the minor impact of the introduction of an altered access point to serve the development.

6.46 It is considered that the proposed development will not have an adverse impact on the significance of the East Grafton Conservation Area, and therefore the development is in accordance with Policy CP58.

7. Design & Access Statement

- 7.1 **Amount** – 1 no. dwelling, with associated parking, landscaping and private amenity space;
- 7.2 **Layout** – the creation of one dwelling, located centrally within the site with a three-bay garage to the front, and garden space to the rear (north);
- 7.3 **Scale** – the proposed dwelling will be no higher than 2-storey and will be designed to reflect the character and appearance of the surrounding development and adjacent conservation area;
- 7.4 **Appearance** – a restrained pallet of materials and architectural features will promote local distinctiveness and respond to the opportunities to promote high-quality design;
- 7.5 **Landscaping** – a landscaping scheme of mixed native species can be created to provide a visually attractive environment;
- 7.6 **Access** – vehicular access will be via the existing access, to the south, off A338. The existing access will be altered to ensure it meet current highways standards. Access principles will conform to the Manual for Streets. The amount of residential car parking will have regard to the LPA's minimum car parking standards. The proposed development includes the erection of a three-bay garage – with sufficient turning and parking space to the south of the site.

8. Conclusion

- 8.1 In conclusion, this Statement outlines the reasons why the Council should grant planning permission for the erection of 1 no. dwelling as the scheme accords with the development plan. When applying the presumption in favour of sustainable development, such a scheme in accordance with the development plan should be approved without delay. The Applicant looks forward to the Council granting planning permission.