

12th November 2025

Our Ref: SWLC.LPC6238

Development Services – North
Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Dear Sir/Madam

Town and Country Planning Act 1990
Re: Permission in Principle for the erection of 1 No new dwelling
in lieu of the existing stables and welfare facilities at
Woodside End Stables, Greenhill, Wiltshire, SN4 8EH

Please find enclosed a duly completed Permission in Principle (PiP) application for the erection of a single new dwelling at Woodside End Stables, Greenhill, Wiltshire, SN4 8EH. The site in question is shown below, and the proposed new dwelling will replace the existing stables and associated storage structures, as well as the separate welfare premises.



The application approach is defined in the National Planning Practice Guidance (PPG), as below;

The permission in principle consent route is an alternative way of obtaining planning permission for housing-led development which separates the consideration of matters of principle for proposed development from the technical detail of the development. The permission in principle consent route has 2 stages: the first stage

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(or permission in principle stage) establishes whether a site is suitable in-principle and the second ('technical details consent') stage is when the detailed development proposals are assessed.

This establishes that the application is a two-stage process, with the first stage solely intended to establish whether the site is suitable in principle and the second stage then considering the detailed development proposals and potential impacts. The Government's guidance sets out that the scope of the first stage of permission in principle is limited to location, land use and the amount of development.

It is the purpose of this Planning Statement to focus on the principle of development at this location only. Any further details in respect of the intended dwelling and its acceptable assimilation will be submitted at the technical details stage. I will of course provide an overview of the planning policy context and an assessment of the key material planning considerations, demonstrating the proposal's acceptability.

BACKGROUND CONSIDERATIONS

The application site's planning history highlights that the current equestrian use is both an established, and in part, potentially tolerated position. The yard is a brownfield site used for commercial and private purposes. It comprises a T shaped stable building range, with fodder, bedding and tack storage space. The majority of the stable range is constructed from concrete blocks with timber framing to the front. The rest of the structure is more fully constructed as a timber framed range.

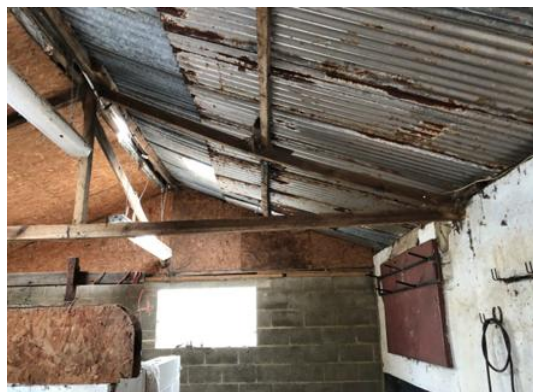
Behind the stable building there are two separate storage structures. Finally, to the western side of the site is a welfare structure providing shelter and kitchen/toilet facilities. This structure is understood to comprise an old mobile home that has been clad with timber boarding. Pictures of all the structures on site are inserted below.





It is important to compare the buildings on site with those on the neighbouring site, historically known as Brockhurst Farm Stables.

By application reference PL/2021/07191 planning permission was granted for the conversion of the former stable buildings thereat, to create 1 No new dwelling. As the pictures below shown the buildings in question were a mix of concrete blockwork and more rudimentary infill sections.





The above approval was never enacted as planning permission was subsequently granted by application reference PL/2022/08003 for the erection of a large new 'replacement' dwelling in lieu of an adjacent sanctioned replacement dwelling and the above residential conversion. The conversion established the increased physical spread as a fallback argument.

These considerations are believed to be material to the assessment of the enclosed application. There are no reasons to suggest that the residential conversion of the existing stable building would not be supported on the same basis and comparable application of planning policy. The sites are direct neighbours, and the second photograph on the previous page includes the newly built dwelling in the background.

As the case officer's delegated report noted, regarding the approved conversion; *'... any additional structural intervention for the overall stability of the outbuilding and the works proposed are mostly internal including fitting of insulation and alterations to existing external materials'*.

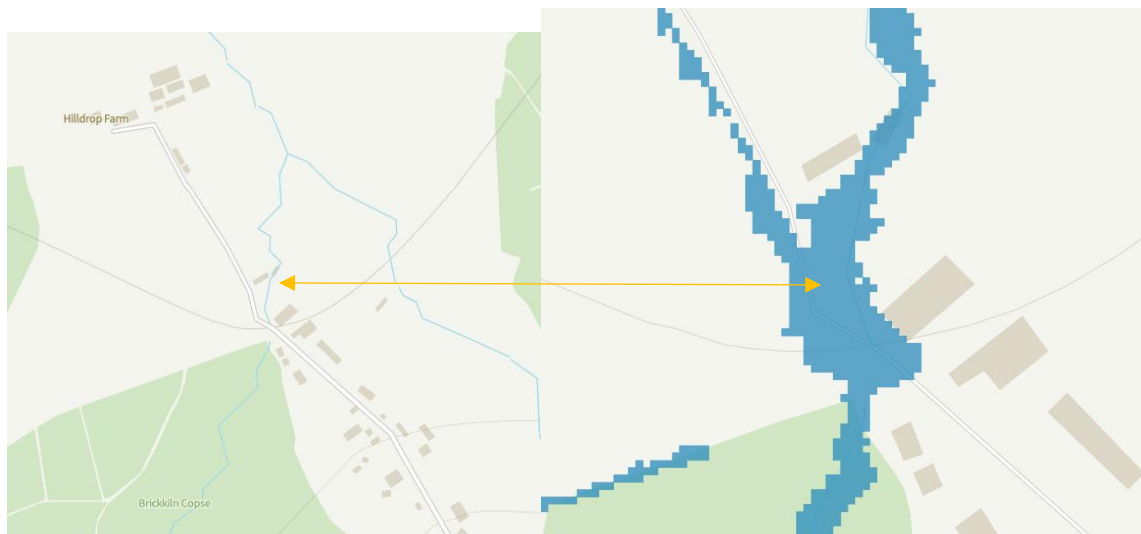
It was also noted in any event that policy CP48(i) of the Wiltshire Core Strategy (WCS) *'allows extensions and alterations that would preserve the character of the existing building, the replacement of existing dilapidated external material and the removal of the unfavourable roof and existing lean-to rear extension is considered to enhance the existing character of the building and subsequently the immediate setting/landscape.'*

No objection was received from your Council's Highways Officer with regard to access or highway safety in general. Although comparatively remote from local services it was also concluded that this is not a practical location for alternative uses, sequentially preferred by CP48.

Over and above the comparable benchmarking between the adjacent sites, supporting the reasonable assumption that an application as a matter of consistency, for a subsequent policy compliant conversion would be likely to be approved, it is also noteworthy that other residential development has been recently sanctioned on Greenhill at The Claypits, involving the stationing of caravans for residential purpose (LPA Ref PL/2023/04820).

The officer's delegated report in that regard opined that, *'although occupiers would be car dependent, that is to an extent an inevitability with countryside locations'*. Indeed, he went on to state that, *'it would be difficult to sustain an objection on appeal that the site is genuinely so remote and unreasonably far from facilities and services that it would be considered 'away from existing settlements'*.

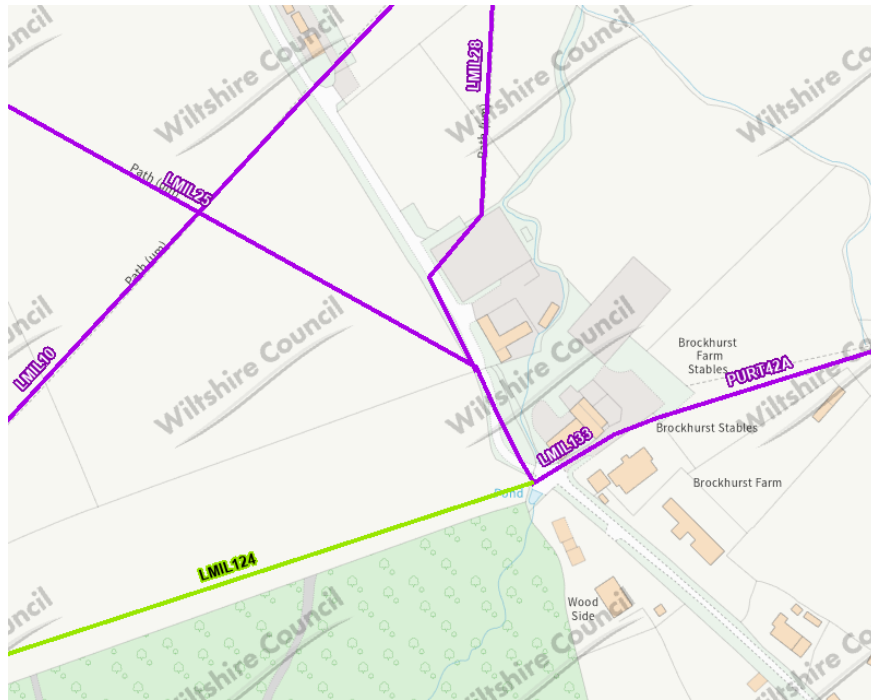
The area's flood mapping, to the left below, shows that the application site lies in Flood Zone 1. There is however an open drainage ditch that runs along the south eastern side of the enclosed yard. In this regard the right hand side extract shows there is evidence of surface water drainage along the access road and reflective of the drainage ditch routing.



The application site is nearly completely laid to hard surfacing so the technical detailed stage provides an opportunity to improve the site's porosity and design a suitable sustainable drainage strategy that also demonstrates that a suitable residential environment will be created, adopting flood resistant measures if considered necessary. The horse schooling arena shown below will also no longer be needed and its compacted surfacing can be removed to improve both porosity and biodiversity.



With regard to the background considerations, believed to be material to the planning balance I shall review in due course, the footpath plan extract inserted below highlights the confluence of several paths in close proximity. Vehicular access to the application site is shared with Hildrop Farm to the north, where the road, shared with the footpath shown below (LMIL28) becomes private, past Brockhurst Farm.



Finally, the site lies within the outer zone of influence (4.2 – 9.4km) for the North Meadow National Nature Reserve (NNR)/Site of Special Scientific Interest (SSSI) component of North Meadow and Clattinger Farm SAC, notified as an exceptional example of lowland meadow with a very high proportion of the surviving UK population of snake's head fritillary. Within this area, there is evidence that housing development contributes to the deterioration of the SAC. A Recreational Mitigation Strategy (RMS) has been agreed upon with Natural England, involving contributions secured under Section 111 of the Town and Country Planning Act, 1990 (as amended). The applicant will enter into such an agreement for this application, and as such, the Council will be able to conclude that the protected site will be adequately safeguarded, in accord with Wiltshire Core Strategy Core Policy 50 and the legal duties under the Habitat Regulations 2017.

THE PROPOSAL

Permission in Principle is sought for the erection of 1No new dwelling, redeveloping the existing equestrian yard and replacing the various stables, storage facilities and welfare premises rather than explore their conversion as a staged approach. The existing concrete hardsurfacing will be removed too.

The site as a whole measures approximately 1200m² in area and will utilise the existing access, and return the associated equestrian land to farm land. All potential

comings and goings associated with the site's unrestricted equestrian use will be removed.

The site's established planted boundaries will be retained and augmented as part of the second stage technical details submission.

PLANNING POLICY CONTEXT

National Planning Policy

The NPPF (December 2024), and associated PPG, sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions. The policies within the following chapters of the NPPF are relevant to the assessment of the proposed development:-

- Chapter 2 – Achieving Sustainable Development
- Chapter 4 – Decision-making
- Chapter 5 – Delivering a Sufficient Supply of Homes
- Chapter 9 – Promoting Sustainable Transport
- Chapter 11 – Making Effective Use of Land
- Chapter 12 – Achieving Well-Designed Places
- Chapter 15 – Conserving and Enhancing the Natural Environment

The Local Development Plan

The NPPF highlights that planning law (section 70 [2] of the Town and Country Planning Act 1990 and section 38 [6] of the Planning and Compulsory Purchase Act 2004) requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

The associated PPG confirms that the same applies to an application seeking permission in principle; "A decision on whether to grant permission in principle to a site following a valid application ... must be made in accordance with relevant policies in the development plan unless there are material considerations, such as those in the National Planning Policy Framework and national guidance, which indicate otherwise" (Paragraph: 011 Reference ID: 58-011-20180615).

At the current time the statutory development plan in respect of this application consists of the Wiltshire Core Strategy (WCS) (Adopted January 2015); and the 'saved' policies of the North Wiltshire Local Plan (NWLP) 2011 (Adopted June 2006), and Lydiard Millicent Neighbourhood Development Plan (LMNDP) (2021). In that regard the following policies are believed to be relevant to the enclosed application.

Wiltshire Core Strategy (2015)

Core Policy 1: Settlement Strategy

Core Policy 2: Delivery Strategy

Core Policy 3 Infrastructure Requirements

Core Policy 19: Spatial Strategy for the Royal Wootton Bassett and Cricklade Community Area

Core Policy 41 Sustainable Construction and Low-Carbon Energy

Core Policy 45 Meeting Wiltshire's Housing Needs;

Core Policy 44: Rural Exceptions Site

Core Policy 48: Supporting Rural Life

Core Policy 50: Biodiversity and Geo Diversity

Core Policy 51 Landscape

Core Policy 57: Ensuring High Quality Design and Place Shaping

Core Policy 60: Sustainable Transport

Core Policy 61: Transport and New Development

Core Policy 64: Demand Management

Core Policy 67: Flood Risk

Core Policy 67 Flood Risk;

Core Policy 68 Water Resources.

Saved Policies North Wiltshire Local Plan 2011 (2006)

H4 Residential Development in the Open Countryside

Lydiard Millicent Neighbourhood Development Plan (LMNDP) (2021)

• Policy LM3 – Local Gap

PLANNING ASSESSMENT

As set out in paragraph 012 of the PPG, the matters to be considered when determining permission in principle applications are limited to location, land use and the amount of development. This application relates to the construction of 1No dwelling on a parcel of previously developed equestrian land located outside the defined settlement boundary of a recognised settlement, although it should be stressed that the new residential development at The Claypits acknowledged that the site is reasonably located for access to services and facilities.

In terms of assessing this PiP proposal against the adopted WCS and the spatial strategies, namely: CP1, CP2 and CP19 (the spatial strategy for Royal Wootton Bassett and Cricklade), under which the development falls, the site is located in the countryside.

Policy CP2 of the adopted WCS indicates that other than in "circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map".

This proposal does not therefore satisfy any of the 'exception policies' listed in paragraph 4.25, although as part of the planning balance to be relied on it is material to note that the application of Core Policy 48, as evidenced on the immediately adjacent site in similar circumstances, forces the conclusion that there is a very reasonable prospect of delivering residential accommodation on this site as relevant fallback.

Previously Developed Land is defined (WSC Page 323) as Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes, where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation ground and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape on the process of time. The application site is previously developed land.

The NPPF at section 11 promotes the effective use of land in meeting the needs for housing and at paragraph 125 gives substantial weight to the value of using suitable brownfield land, albeit ideally within settlements, but also promoting development of under-utilised land and buildings where that would help meet identified needs for housing.

Paragraph 72 to the NPPF is repeated below as it highlights the issue of housing need.

‘Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.’

Planning policies should identify a supply of:

- a) specific, deliverable sites for five years following the intended date of adoption; and
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

The NPPF confirms that the Council needs to provide a five year Housing Land Supply (HLS). As a result of recent changes to the way housing need is calculated, introduced by Government, the Council is unable to demonstrate a five-year supply of deliverable housing sites. Currently, the Council can only show a 2.42 year supply.

As a result of this housing land supply shortfall, NPPF paragraph 11 is engaged and local plan policies which seek to restrict the supply of housing whilst there is a supply deficit should be considered 'out-of-date' and full weight cannot be afforded to these policies. In this case that includes policies CP1,2 and 19.

As set out within the NPPF the presumption in favour of sustainable development (the 'tilted balance') set out in paragraph 11d)ii. is engaged whereby permission should be granted for new housing unless any adverse impacts of doing so would "significantly and demonstrably outweigh the benefits."

This assessment is well rehearsed throughout the Council area, and I would draw attention to a recent appeal approval for another PiP submission by application reference PL/2025/00998. The Inspector fully recognised the site's *locational shortcomings by direct reference to a similar policy conflict identified above and at paragraph 14 stated 'I find that the appeal site is **not optimally located** in terms of minimising the use of private car (sic) to reach Kington Langley and other nearby towns and larger settlements'* (my emphasis). In applying the planning balance though the modest contribution to the area's housing supply was assigned substantial weight. He also afforded *'modest favourable weight to the scheme's economic and environmental benefits along with a larger quantum of favourable weight to the utilisation of a brownfield site'* (paragraph 22).

Consequently, based on the same logic, the adverse impacts of the proposal associated with its location outside the development boundary and conflict with policies of the WCS, would not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. Therefore, the presumption in favour of sustainable development applies which is a material consideration that weighs heavily in favour of allowing the enclosed development.

In terms of development in rural areas, and mindful that this is not an isolated site within the meaning determined by the Braintree case, the NPPF requires at paragraph 98 that planning policies and decisions recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable. The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist. Taking a logical approach therefore where the Development Plan's housing policies are out of date these considerations can reasonably be applied to the application development as the local needs are irrefutable, and the potential coming and goings from the site's full livery and teaching etc would be less for a single household.

Windfall housing such as the application proposal make an important and budgeted contribution to the housing supply position. Moreover, *'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly'* (NPPF paragraph 73)

In light of the very substantial housing supply deficit your Council has of course published a Briefing Note (No.24-20) which set out the implications of the NPPF and revisions to the standard methodology on its housing land supply position. It explains that due to the change to the standard methodology, which is used to calculate local housing need, the number of homes the Council must plan for on an annual basis has increased from 1,917 to 3,525 (the annual Local Housing Need figure), an increase of 84%. There is clearly a large scale issue to address that requires a positive approach to all housing developments.

The Briefing Note explains that “the changes to the NPPF now require Wiltshire to demonstrate a five-year housing land supply, including a 5% buffer, and must apply the revised Local Housing Need for decision-taking immediately”. When the revised Local Housing Need figure is considered against the Council’s Housing Land Supply figures which can be delivered within five years, it results in a 2.42 years supply. Your Council therefore confirms that the tilted balance should be applied to housing application and highlights that “the magnitude of the shortfall in supply is now substantial and the weight to be given to improving housing supply greater compared to when the council had a more marginal supply”. This changes the weight to be given to applications for positive additions to the housing supply generally. The Council also advises within the Briefing Note that the application of the presumption in favour of sustainable development should be considered within the national aim of radically boosting the supply of housing.

In terms of the implications for plan-making, the Council confirms that because the housing requirement in the emerging Local Plan will meet less than 80% of the revised Local Housing Need, the Council will be expected to begin work on a new Local Plan promptly. However, when the new Local Plan is adopted, the five year Housing Land Supply position will be determined based on the previous Local Housing Need calculation, albeit the updated NPPF requires a 20% buffer to be added, which in essence will require a six-year Housing Land Supply position to be demonstrated.

The Director of Planning clearly advises within the above Briefing Note that “To meet this increased buffer, the council will need to continue to approve planning applications to ensure a sufficient housing land supply can continue to be met at, and beyond, this date”. This is obviously not an encouragement to support those that satisfy the Development Plan but to take a more positive approach to growth involving previously developed land and closely related to existing settlements for instance.

In these circumstances, NPPF paragraph 11d advises that policies which are most important for determining the application (which in this case would include Core Policies 1, 2 and 19) should not be considered up to date. As a result, the presumption in favour of sustainable development as set out at Paragraph 11d of the Framework is engaged, so permission should be granted unless 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.

It is considered that there would be no adverse impacts associated with the approval of the PiP application that would significantly and demonstrably outweigh the benefits. In terms of the benefits, the proposed development would result in the provision of a new dwelling that would contribute towards the substantial deficit in the Council’s five-year housing land supply, which is a significant benefit. The development would also produce short term economic benefits to the construction

industry, and the development would also generate ongoing revenue for the Council from Council Tax etc.. There will also be further benefits that would result from the additional support to the vitality of the local community from the future occupiers of the development reflecting the support for rural housing at paragraph 83 to the NPPF. The development would also deliver ecological benefits associated with the requirement to deliver 10% Biodiversity Net Gain that will be considered during the technical details stage. As a brownfield site the development reduces pressures on greenfield land and will also increase planting generally, removing the exercise arena.

In terms of the harms, the development is considered to comply with the spirit of WCS as it is accessible and not isolated, and prioritises a previously developed site, where the neighbouring recent redevelopment comparison forces the conclusion a consistency of approach would support the existing rural building's residential conversion, and is therefore in accordance with the NPPF. However, without prejudice, and should the Council disagree and identify conflict with the plan-led approach only very limited weight should be attributed to this factor within the overall planning balance because Core Policies 1, 2 and 19 are not only out of date but the scale of the housing deficit is very substantial. The site is well contained, and it will be demonstrated during the technical details stage that the development would not result in any site specific harms, or to the wider environment that cannot be adequately mitigated. As said earlier my client is willing to enter into the anticipated section 111 agreement.

This application is not for a 'major' development, and the site is not 'isolated'. In terms of the paragraphs that are relevant, in addition to those already noted, paragraph 110 outlines that the planning system should actively manage patterns of growth to ensure developments are acceptable. This paragraph is relevant, as it goes on to state that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. The development would result in the effective and efficient use of land in accordance with the objectives of paragraph 129 and can be designed to ensure it will function well and add to the overall quality of the area in accordance with paragraph 135.

The proposed development would contribute towards the Government's aim of significantly boosting the supply of homes in an accessible previously developed location and it is believed that when considering the overall tilted balance, which includes having regard to the key policies for directing development to sustainable locations, making effective use of land, and securing well-designed places, there would be no adverse impacts that stem from the development that would 'significantly and demonstrably' outweigh the benefits, when assessed against the policies in the NPPF.

The contribution made by the approval of minor developments throughout the Wiltshire Council area, towards addressing housing need, should not be underestimated and now has greater importance considering the Council's substantial housing land supply deficit and the Government's objective to radically boost the supply of housing, as identified by the Council within the aforementioned Briefing Note.

I trust the case outlined above and material considerations are clear however if you have any questions to ensure your support please do not hesitate to contact me direct.

Yours faithfully

Simon Chambers
Director

Enc.

Cc: Mr and Mrs McCormack