

PLANNING, DESIGN AND ACCESS STATEMENT

**LAND ADJACENT TO TRUANT HOUSE, FROXFIELD,
MARLBOROUGH, SN8 3JY**

ON BEHALF OF MR. DANCE



TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

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APPENDIX 1 - Examples of HEB houses

1. INTRODUCTION

- 1.1 This Planning, Design and Access Statement has been prepared by RAW Planning Ltd to accompany accompany a full planning application for the construction of a single residential dwelling, garage, associated access, landscaping and formalised parking for the adjacent All Saints Church. The application is submitted on behalf of Mr. Dance ("The Applicant") and relates to land he owns to the west of Truant House, Froxfield, Marlborough, SN8 3JY (the "Application Site").
- 1.2 This report builds upon the earlier pre-application enquiry (Ref: ENQ/2024/01162) and responds directly to the issues raised by Wiltshire Council. It provides a comprehensive justification for the development within the context of national and local planning policy and is supported by a suite of technical reports prepared by qualified specialists.
- 1.3 Mr Dance and his partner have lived in the village for 17 years, and they actively contribute to the community both socially and practically. They live at Truant House which is a large dwelling on a generous plot with a swimming pool. Mr Dance and his partner wish to remain in the village following retirement but with a proportionate sized home. The proposed dwelling would provide for this with it being a modest single storey dwelling, well designed to blend into the landscape. The community have expressed support for them to remain in the village and advocate the proposed new dwelling.
- 1.4 This application is supported by a full drawing package prepared by Milton Architects and HEB Homes, along with the following technical reports:
- Ecological Appraisal prepared by Joanna Graham Ecology Ltd;
 - Groundwater and Drainage Assessment prepared by Calibro Consulting;
 - Transport Note prepared by Nick Culhane Highways Consultant;
 - Archaeological Desk-Based Assessment prepared by Forum Heritage Services, and
 - Arboricultural Impact Assessment prepared by SJ Stephens.

2. THE APPLICATION SITE AND SURROUNDINGS

- 2.1 The application site is located on a parcel of land on the western side of the small village of Froxfield. The settlement of Froxfield is located close to the valley floor through which the River Dun (a tributary of the River Kenent) flows, although the site itself is higher up the valley slope. In its wider context, Froxfield lies between the settlements of Hungerford and Marlborough, 3-miles to the east and 7-miles to the west respectively.



Figure 1: Aerial photograph of application site

- 2.2 Froxfield benefits from a number of services and facilities, including a public house (The Pelican), church, village hall, furniture store, as well as several independent commercial businesses. There are also regular bus services within Froxfield which provide easy travel to Marlborough and Hungerford, and the rural settlements between.
- 2.3 The site within the red line area extends to 0.15ha and comprises a parcel of greenfield land. The north of the site is bound by Church Lane and to the east is Truant House and its associated garden. To the south is the Froxfield Stream and Bath Road (A4) and to the west is All Saints Church and agricultural land.
- 2.4 In relation to national and local land designations for the purpose of planning policy, the site and surrounding landscape lie within the North Wessex Downs National Landscape. The site is also located within the Froxfield Conservation Area and within the setting of listed All Saints Church. Due to the

site's topography slopes gently southwards, with the northern section lying wholly within Flood Zone 1 and thus suitable for development.

3. THE PROPOSALS

- 3.1 The proposal is for a modest, four-bedroom dwelling of contemporary but agricultural form, together with a double garage, associated access, and landscaped garden.
- 3.2 The proposed dwelling has been designed by HEB Homes who are specialists in contemporary rural housing that combines high quality architectural design with precision off-site construction. The HEB system utilises a prefabricated timber kit that is manufactured under controlled conditions to ensure excellent build quality, high levels of insulation and energy efficiency. Examples of existing HEB homes can be found in Appendix 1.
- 3.3 This approach allows the main elements of the building to be assembled on site within a short period, significantly reducing the construction programme compared with traditional methods. As a result, there would be less disturbance to nearby residents and the wider village in terms of noise, dust and construction traffic. The method also minimises waste and ensures a consistent, high-quality finish, aligning with the project's sustainability objectives and the wider aims of the NPPF and Wiltshire Core Strategy to promote efficient, low-carbon construction.
- 3.4 The dwelling will be positioned on the higher northern part of the site, within Flood Zone 1, with finished floor levels raised to a minimum of 111mAOD to mitigate groundwater risk. The design incorporates a simple low-profile form with high-quality materials, intended to assimilate with its surroundings and ensure a neutral impact on heritage assets as confirmed at pre-application stage.

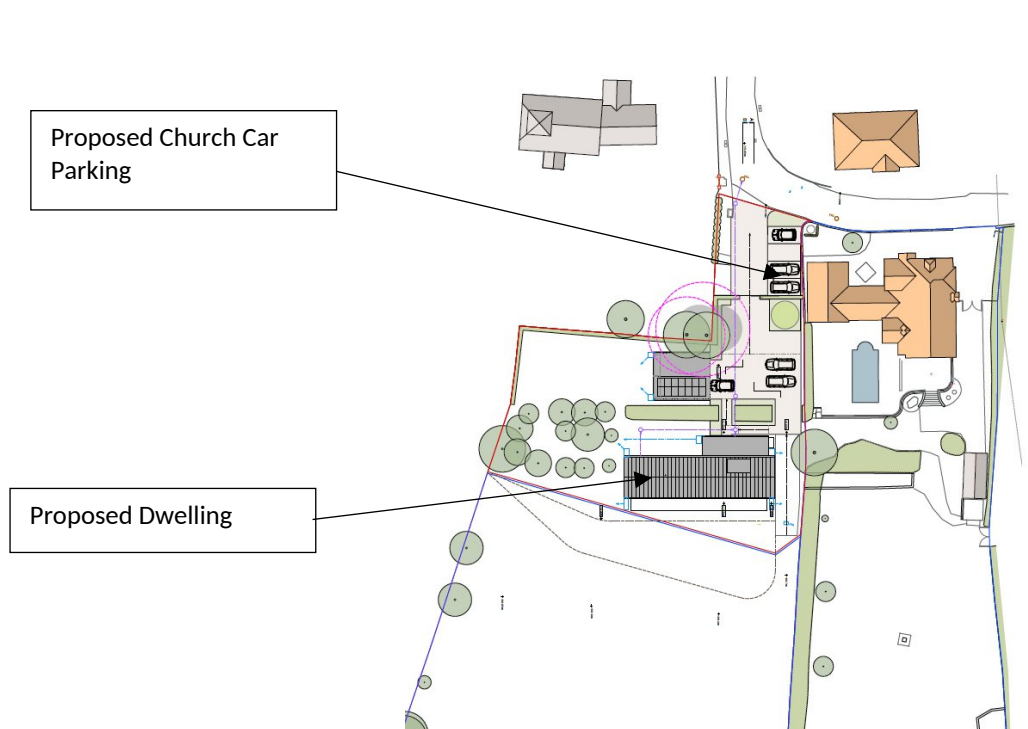


Figure 2: Proposed Site Layout

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- 3.5 To the south of the access would be a double garage with capacity for two vehicles in addition to a turning area with parking for two visitor spaces. Cycle parking would be provided within the garage. The existing laurel hedge would remain in situ which would screen the dwelling from the church and Church Lane to the north.
- 3.6 It is also proposed to provide a dedicated car park for church users in the absence of an existing facility. At this location, there has been unofficial parking for the church which the previous owner (a local farmer) sectioned off from his land. However, it was never officially gifted to the church. When the applicant purchased the land, their intention was always to retain the parking facility for the church and the village. This application allows an opportunity to incorporate four formalised car parking spaces which has the added benefit of a visual improvement.

4. RELEVANT PLANNING POLICIES

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is considered to be a material consideration which attracts significant weight.

4.2 This section refers to relevant national planning policy and guidance as well as Development Plan policies that provide the planning policy framework for this enquiry that should be considered. It deals with the following layers of policy and guidance:

- National Planning Policy Framework (NPPF); and
- The Development Plan (including Neighbourhood Plans).

4.3 National Planning Policy Framework (NPPF)

4.4 The NPPF outlines national guidance and the Government's policies on the many different aspects of planning. The latest version of the NPPF was published in December 2024.

4.5 Paragraph 60 sets out Central Government's objective to significantly boost the supply of homes, identifying that to support this objective it is important that a sufficient amount and variety of land can come forward where it is needed.

4.6 Paragraph 70 recognises that small sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.

4.7 Paragraph 83 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

4.8 Paragraph 123 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

4.9 Section 12 is entitled "Achieving well-designed places". Paragraph 131 explains that good design is a key aspect of sustainable development. Paragraph 135 sets out that planning policies and decisions should ensure that developments will add to the overall quality of their area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history, including the surrounding built environment and landscape setting.

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- 4.10 Section 16 is entitled “Conserving and enhancing the historic environment”. Paragraph 205 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).
- 4.11 Paragraph 208 states that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimal viable use.
- 4.12 **The Development Plan**
- 4.13 The Statutory Development Plan covering the application site comprises the Wiltshire Core Strategy (2015). The most relevant policies in the consideration of this application are as follows:
- 4.14 **Core Policy 1 (Settlement Strategy)** sets out the settlement strategy for Wiltshire stating development at small villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.
- 4.15 **Core Policy 2 (Delivery Strategy)** sets out a housing requirement for Wiltshire of 42,000 homes over the Plan Period (2006 to 2026). The Policy states that in Small Villages, development will be limited to infill within the existing built area, and goes on to state that proposals will be supported where they seek to meet the housing needs of settlements. New development must meet three criteria: a) respect the existing character and form of the settlement; b) not to elongate the village or impose development in sensitive landscape areas, or c) not to consolidate an existing sporadic loose knit area of development related to the settlement.
- 4.16 **Core Policy 14 (Marlborough Community Area)** identifies Froxfield as a ‘Small Village’ in the settlement hierarchy.
- 4.17 **Core Policy 51 (Landscape)** requires development to protect, conserve and where possible enhance landscape character and to not have a harmful impact upon landscape character with any negative impacts mitigated as far as possible through sensitive design and landscape measures.
- 4.18 **Core Policy 57 (Ensuring high quality design and place shaping)** sets out 14 criteria which all new developments must meet, including alterations to existing buildings. Specifically, criterion (iv) requires development to be sympathetic to, and conserve historic buildings, and criterion (xii) requires the use of high standards of building materials and finishes.

- 4.19 **Core Policy 58 (Ensuring the conservation of the historic environment)** states that development should protect, conserve and enhance the historic environment. Designated heritage assets should be appropriately enhanced in a manner appropriate to their significance.

Wiltshire Local Plan Review

- 4.20 The Wiltshire Local Plan Pre-Submission draft 2020-2038 (Reg 19) Submission Version carries moderate weight. In this draft plan, Froxfield is identified as a small village within the “Swindon Rural Area”. Within this area, the draft Plan states at paragraph 4.264 that housing proposals help to support the role rural settlements have as an important part of the Settlement Strategy. At paragraph 4.267, the Plan states that at small villages, there is no specific requirement for the scale of housing growth, but the plan states that this does not mean that there can be no additional growth in these areas. The text goes on to remark that new housing development will be limited to infill within the existing built up area of small villages.
- 4.21 Draft Policy 1 (Settlement Strategy) states that development at small villages will be “*limited to respond to needs and to contribute to their vitality*”.

Froxfield Conservation Area Character Appraisal and Management Proposals (February 2007)

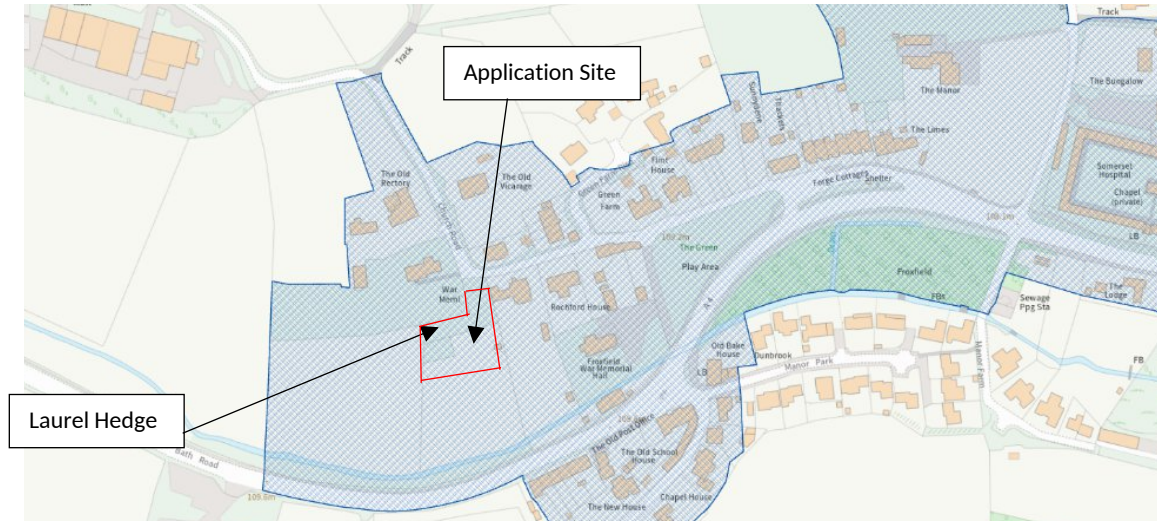


Figure 3: Extent of Froxfield Conservation Area (blue hatching) [source: Wiltshire Council website]

- 4.22 The site falls within the designated Froxfield Conservation Area. The Character Appraisal and Management Proposal was prepared in 2007.

Material Considerations

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- 4.23 Paragraph 11(d) of the National Planning Policy Framework (NPPF, December 2023) establishes the so-called “tilted balance.” This applies where a local planning authority cannot demonstrate a five-year supply of deliverable housing land, rendering its relevant housing policies out-of-date. In such circumstances, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole. Wiltshire Council’s latest published position confirms that it can only demonstrate a 2.42 year supply of housing land which less than half the required amount. This very substantial shortfall means that the tilted balance is engaged in this case, requiring the application to be determined positively unless material harm is identified that clearly and demonstrably outweighs the benefits.

5. PLANNING ASSESSMENT

Principle of Development

- 5.1 Froxfield is identified as a 'Small Village' within Core Policy 14 of the Wiltshire Core Strategy. Small Villages do not have settlement boundaries, and Core Policy 2 states that new development should constitute infill within the existin built area.
- 5.2 The application site, whilst not sitting within the main body of the village, does sit comfortably with the existing pattern of development, as shows in the Figure Ground diagram at Figure 4. The proposed dwelling would abut the built area of the village on Church Road. The site is closely contained by existing development: to the east lies Truant House, a substantial dwelling, and to the north the Grade II* listed All Saints Church and its churchyard. In this context, the site forms the western extent of the village and would effectively "round off" the settlement edge. The proposed dwelling would be functionally and visually linked to the village and would not be read as an isolated home in the countryside.
- 5.3 Church Road is a very low trafficked road, and due to the location by the bend in the road, the few vehicles which use it are travelling at a low speed. Therefore, the location of the site would allow the future occupier to access the range of local services, including a public house, church, village hall, and bus services to nearby towns such as Marlborough and Hungerford. The accessibility of these facilities, combined with the modest scale of the scheme, demonstrates that the proposal would represent a sustainable form of development consistent with the objectives of the NPPF to promote rural vitality.
- 5.4 The Council currently cannot demonstrate a five-year housing land supply, with only 2.42 years available. Consequently, paragraph 11(d) of the NPPF the tilted balance is engaged. In such circumstances, permission should be granted unless adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.
- 5.5 In this case, the pre-application response confirmed that no harm would arise to heritage assets or to the wider landscape character. Technical reports now address all outstanding matters relating to ecology, drainage, highways, and archaeology, with no identified constraints. Given these circumstances, it is submitted that the proposed dwelling would not cause harm.

- 5.6 Against the substantial shortfall in housing land supply, the provision of a self-build dwelling, together with the formalisation of car parking for the adjacent church, are clear public benefits. The tilted balance is therefore engaged, and permission should be granted.

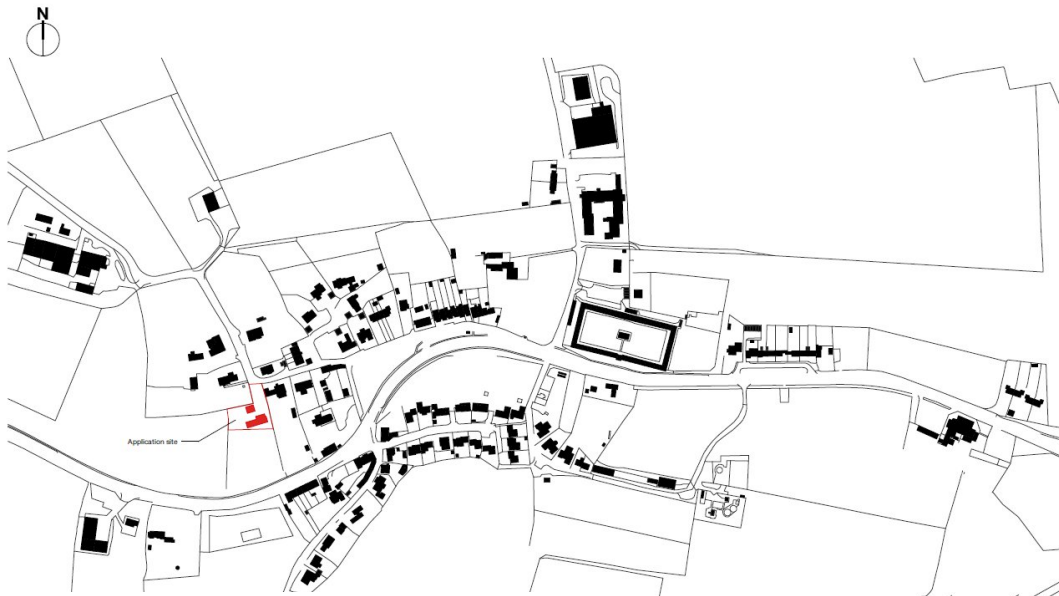


Figure 4: Figure Ground Diagram (drg no. 2405/2_002 Rev B)

Impact on North Wessex Downs National Landscape

- 5.7 Whilst the site is located within the North Wessex Downs National Landscape, this is a landscape designation that washes over a large settlement and does not in itself make the site a particularly sensitive landscape area. Nonetheless, due to the topography rising up towards the site from the A4 (to the south), coupled with the existing natural screening along the A4 and to the west of the site, the site cannot be seen from any public vantage points.



Figure 5: View from proposed dwelling location looking south towards the A4



5.8 *Figure 6: View looking north towards laurel hedge which screens the site from Church Road. Blue line represents approximate position of dwelling.*

he proposed dwelling is a simple, single storey 'agricultural' style dwelling that would appear as a rural building within the setting of Froxfield as a settlement. It is a similar approach taken to the dwelling which was approved at Green Farm, 300m to the north west of the application site (ref: PL/2021/05662).

- 5.9 The new dwelling at Green Farm is two storey with a total floor area of 255sqm (footprint of 166sqm). The officer's report for this application remarks that whilst the dwelling would be partially visible from a small number of locations, it would be seen as part of the existing built form. The dwelling has been constructed as seen in Figure 7 below.



Figure 7: Dwelling approved under PL/2021/05662 [source: Google].

- 5.10 This application proposal is for a slightly smaller dwelling than Green Farm Rise as it extends to 227sqm floor area with a footprint of 162sqm. With it being 1.5 storeys, it would be more screened from public view. Accordingly, the dwelling in its proposed location would not compromise the special landscape qualities and scenic beauty of the North Wessex Downs National Landscape.

Groundwater and Flood Risk

- 5.11 A Groundwater and Flood Risk Assessment prepared by Calibro Consulting (October 2025) confirms that the dwelling can be safely located within Flood Zone 1, outside areas at risk of fluvial or surface water flooding. Groundwater mapping indicates potential shallow groundwater across the site; accordingly, the dwelling floor level is to be set at a minimum of 111mAOD, above the low-to-moderate risk threshold.
- 5.12 Surface water will be managed via sustainable drainage (SuDS), with infiltration subject to testing. If infiltration is not feasible, discharge to the Froxfield Stream is possible. The foul water will be pumped up to Church Road. These measures ensure compliance with Core Policy 67 and fully address the Council's earlier concerns.

Highways

- 5.13 A Highways Technical Note has been prepared by Nick Culhane Highway Consultant Ltd (August 2025). This included an Automatic Traffic Count survey which confirmed very low traffic flows and speeds (85th percentile below 20mph). Visibility splays exceed Manual for Streets requirements, and forward visibility for right-turning vehicles is acceptable at the recorded speeds.
- 5.14 The access arrangements have been improved to provide four formalised parking spaces for the church and turning areas to enable all vehicles to exit in forward gear. The report concludes that the development will not result in any adverse impact on highway safety or efficiency, fully addressing the points raised at pre-application stage.

Ecology

- 5.15 An Ecological Appraisal prepared by Joanna Graham Ecology Ltd (August 2025) confirms the site comprises low-value habitats requiring no further surveys. Recommended mitigation includes sensitive lighting, protection of tree roots, and precautionary clearance outside nesting season. Enhancements including bird and bat boxes, native planting and log piles will be provided.
- 5.16 As the proposal is for a single self-build dwelling, the statutory Biodiversity Net Gain (BNG) requirement does not apply. Nevertheless, the scheme secures ecological enhancement consistent with Core Policy 50 and the NPPF.

Trees

- 5.17 An Arboricultural Impact Assessment by SJ Stephens Associates (October 2025) has been submitted in support of the application. The report identifies a small number of generally low-to- moderate quality trees and hedges within and adjoining the site. None of which are protected by a Tree Preservation Order, although as the site lies within a Conservation Area, permission would be required for any proposed works. Two small failing saplings and short sections of laurel hedge are proposed for removal, with all remaining trees to be retained and safeguarded in line with BS 5837:2012.
- 5.18 Appropriate protection measures are proposed, including tree protection fencing, ground protection, and areas of no-dig construction to avoid root disturbance. The new garage will sit partly within the root protection areas of several trees but will be constructed on a no-dig slab using a cellular confinement system to protect underlying roots. Only minor pruning is required to allow for construction and future clearance.
- 5.19 Subject to these precautions being followed, the report concludes that the scheme will have no unacceptable impact on existing trees. The retained vegetation will continue to contribute positively to the site's character and setting, in accordance with Core Policy 57 of the Wiltshire Core Strategy and national planning policy.

Heritage and Archaeology

- 5.20 The application site falls within the Conservation Area, but it is not specifically mentioned as having a special character in the Froxfield Conservation Area and Character Appraisal.
- 5.21 Truant House is listed as a locally important 'unlisted' building. In total, 39 buildings and structures of particular merit have been noted as these are considered to contribute positively to the character and appearance of the Conservation Area.

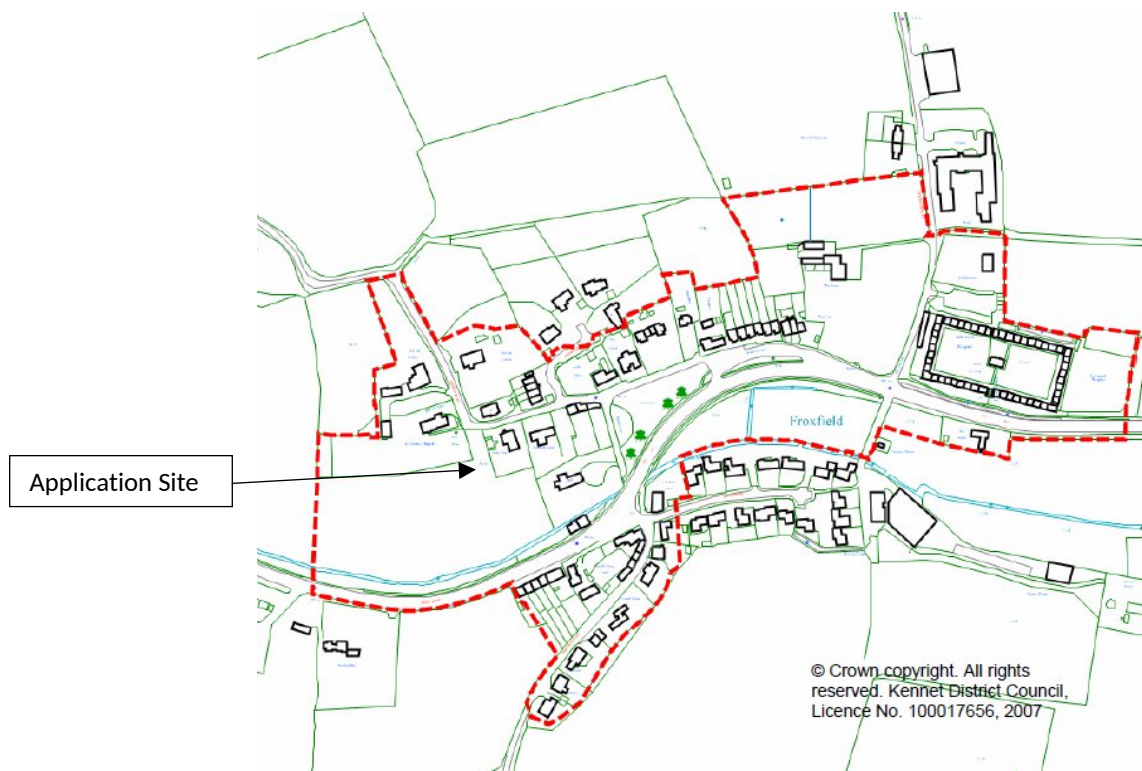


Figure 8: Froxfield Conservation Area

- 5.22 The Church is believed to date from the 12th century and is a surviving medieval structure constructed of flintwork. The Historic England official ID no. is 1034080.

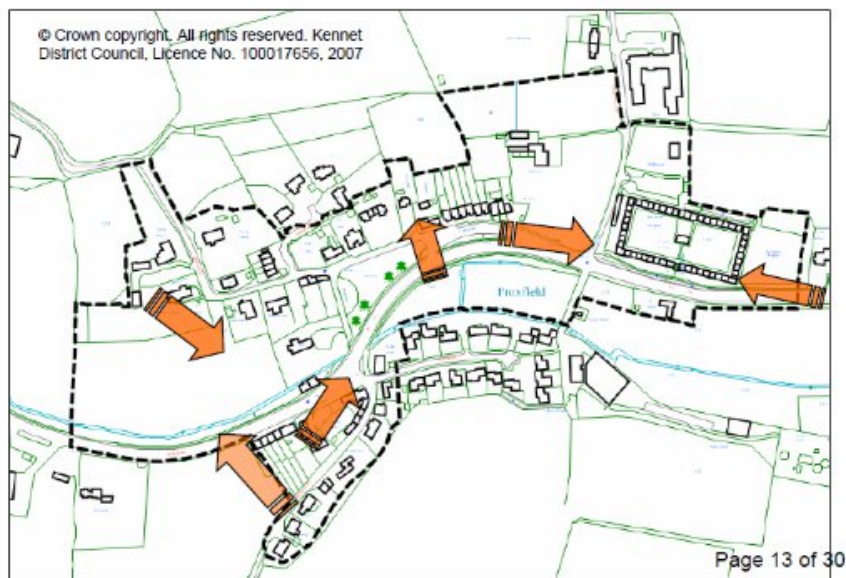


Figure 9: Key Vistas [source: Froxfield Conservation Area Character Appraisal and Management Proposals]

- 5.23 Map 4 on page 30 of the Character Appraisal illustrates a series of “key vistas” into, and from the Conservation Area. One of these identified views is from the churchyard diagonally across to the east and down towards the A4.

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- 5.24 It is assumed this view was identified as it takes in the field within which the site is located along with the southern section of Truant House's garden (permission granted for change of use from agricultural land in 2001 ref: K/42516). This view has now significantly changed since the Appraisal of 2007 by virtue of an 11ft high laurel hedge which runs east-west through the site and largely blocks the views from the churchyard to the land beyond.
- 5.25 An Archaeological Desk-Based Assessment prepared by Forum Heritage Services (August 2025) is submitted with the application. It confirms that there are no designated heritage assets within the site and no recorded archaeological finds or features. The assessment identifies a generally low potential for prehistoric or Roman remains and a moderate potential for Saxon or medieval archaeology near Church Lane, given the proximity to the Grade II* listed Church of All Saints.
- 5.26 The report concludes that there are no heritage constraints that would prevent development of the site. An archaeological watching brief during groundworks for the house and garage is recommended to record any unexpected features of interest.
- 5.27 At the pre-application stage, the Council's Conservation Officer confirmed that the proposed dwelling would have a neutral impact on the setting of the Grade II* listed All Saints Church and the Froxfield Conservation Area. The Forum Heritage assessment concurs with this opinion.

Sustainability

- 5.28 The proposed dwelling has been designed to achieve a high standard of environmental performance in accordance with Core Policy 41 of the Wiltshire Core Strategy and the sustainability objectives of the NPPF. A fabric-first approach ensures high levels of insulation and airtightness, supported by roof-mounted solar panels, battery storage and a heat recovery ventilation system to reduce energy demand and carbon emissions. The dwelling will also be supported by an air source heat pump.
- 5.29 Sustainable drainage measures will manage surface water on site, while native planting, bird and bat boxes and other ecological features will enhance biodiversity in line with Core Policy 50. The scheme therefore represents a sustainable and energy-efficient form of development appropriate to its rural setting.

Planning Balance

- 5.30 The Council has a housing land supply position of 2.42 years. Therefore, there is a very significant shortfall against the requirement to demonstrate a five-year supply of deliverable housing land, as set out at paragraph 78 of the NPPF.

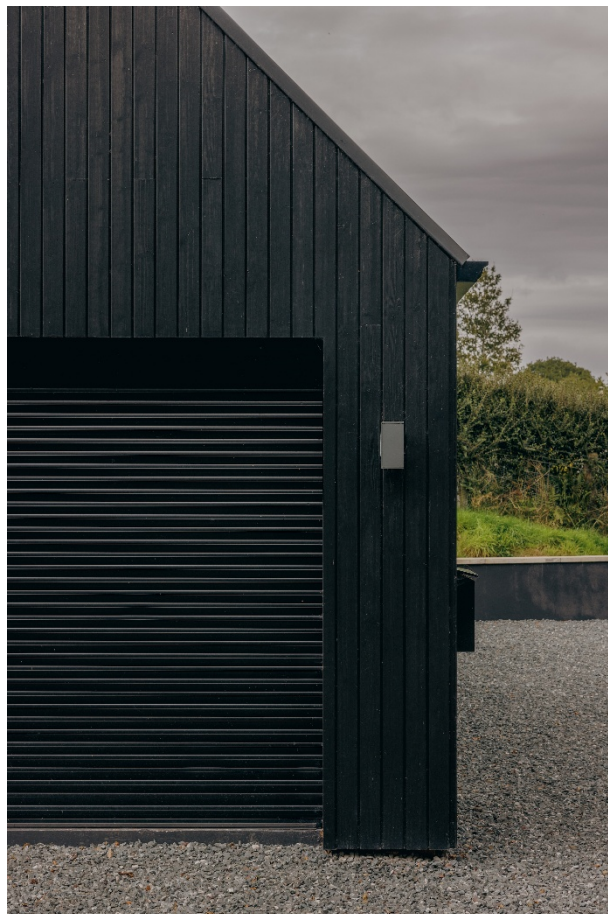
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- 5.31 In this circumstance, paragraph 11 of the Framework is engaged, whereby planning permission should be granted unless (i) policies in the Framework that protect areas or assets of particular importance provide a strong reason for refusing the development, and (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, and 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.
- 5.32 As set out above, the DBA found the proposal would not harm designated heritage assets. Therefore, the NPPF's policies that protect areas or assets of importance do not provide a strong reason for refusing the development.
- 5.33 The proposed development would be located on the edge of the village's built area, in walking and cycling distance of local services. The proposed development would not be isolated, and the development would be in an accessible location with opportunities for travel by public transport. Whilst future occupiers would be likely to use a private car to access services located in larger settlements, paragraph 110 of the NPPF acknowledges that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. Paragraph 83 of the NPPF recognises that where there are groups of smaller settlements, development in one village may support services in a village nearby. The proposal would therefore accord with paragraphs 84 and 110. Limited weight should be attributed to the possible conflict with the Wiltshire Core Strategy policies CP1, CP2 and CP14 as the interpretation of infill is subjective.
- 5.34 The proposed development would not harm the character and appearance of the area, and therefore would satisfy the NPPF's key policies at paragraphs 129, 135 and 139 which together support development that is well-designed and makes efficient use of land taking into account the desirability of maintaining an areas prevailing character and setting, and is sympathetic to local character and history, including the surrounding built environment and landscape setting.
- 5.35 In addition to those key policies, paragraph 73 of the NPPF recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The proposal would provide one additional dwelling, thus making a small but important contribution toward the area's housing requirement. In light of the magnitude of shortfall in the area's housing supply, the provision of one dwelling carries moderate weight in favour of the proposal. Modest weight should also be attributed to the scheme's economic and environmental benefits.
- 5.36 Whilst in our view, the site's location amounts to infill development, any perceived adverse impacts of the proposal associated with its location not being classed as infill (by the decision maker) would not

significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF when taken as a whole. Therefore, the presumption in favour of sustainable development applies towards the grant of planning permission.

6. SUMMARY AND CONCLUSION

- 6.1 The principle of residential development within this location has been considered acceptable due to the location of the site within the built up part of the small village of Froxfield. Furthermore, the current housing land supply position, the site's proximity to services, facilities and sustainable travel opportunities all represent significant material considerations which should weigh heavily in favour of granting planning permission.
- 6.2 The scheme proposes a commitment to a dedicated church car park with parking for 4no. vehicles. The long term nature of this commitment is a community and material benefit that the applicant is pleased to provide.
- 6.3 The proposals have been designed such that the design and layout of the development would respect the heritage and landscape, as well as being acceptable in terms of highway safety, flood risk, neighbouring amenity and safeguarding ecological interests.

APPENDIX 1 – EXAMPLES OF EXISTING HEB HOUSES





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