

**Land North of Swindon Road, Royal
Wootton Bassett**
Planning Supporting Statement

Gleeson Land
November 2025

tor
&co



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Executive summary

This planning statement is submitted to support an outline planning application by Gleeson Land (Gleeson) for residential development on land north of Swindon Road in Royal Wootton Bassett. tor&co has coordinated the application preparation and provided planning, engagement and heritage services.

The proposed description of development is:

“Outline planning application with all matters reserved except for access for up to 135 dwellings, the creation of new vehicular access with footways from Swindon Road, provision of informal and formal open space, together with associated highways, landscape, earth works and level changes, foul and surface water drainage facilities, utilities provision and other associated and necessary infrastructure.”

As set out in the Written Ministerial Statement of 31 July 2024, we are in the midst of the “most acute” housing crisis in living memory. The National Planning Policy Framework continues to provide a clear steer about the importance of delivering sufficient housing to meet housing need and ensure adequate provision of affordable housing. WC has a **significant and serious shortfall** in its requisite housing land supply position, being only able to demonstrate 2.42 years of the required 5 years (June 2025).

Land north of Swindon Road is close to local facilities, employment opportunities and sustainable transport links. The site provides a significant opportunity to deliver a high-quality residential development in a sustainable location, to help address this acute housing need.

The submitted proposals will also provide the following significant benefits:

- Up to 135 new homes providing a mix of sizes and tenure, including affordable housing
- Biodiversity Net Gain of at least 10%, secured through new habitat creation, sensitive landscaping and ecological mitigation
- Sustainable Drainage Systems to manage surface water and improve local resilience to flooding
- The delivery of publicly accessible open space, which will benefit new and existing residents
- Economic benefits through construction activities and increased local population

The proposal represents a sustainable development that will deliver significant social, economic and environmental benefits. When assessed against the National Planning Policy Framework (NPPF) and the Wiltshire Core Strategy (WCS), the benefits are demonstrably outweighing any limited conflict with policy, and the application should therefore be approved without delay.

1.0 Introduction

- 1.1 This statement is submitted in support of an outline planning application for up to 135 new homes on land north of Swindon Road, Royal Wootton Bassett.
- 1.2 The site lies within the administrative area of Wiltshire Council (WC), which is the local planning authority.
- 1.3 tor&co is acting on behalf of Gleeson Land (Gleeson) who controls the site. The application is made in outline, with all matters reserved except access, which is submitted in detail.
- 1.4 The proposed description of the development is as follows:

“Outline planning application with all matters reserved except for access for up to 135 dwellings, the creation of new vehicular access with footways from Swindon Road, provision of informal and formal open space, together with associated highways, landscape, earth works and level changes, foul and surface water drainage facilities, utilities provision and other associated and necessary infrastructure.”

- 1.5 This Statement describes the site and surroundings, the proposal, and the existing planning policy context that relates to the site. This statement should be read alongside the submitted application forms and drawings.

Documents submitted for approval

- Site boundary plan (ref. STN-GEN-SW-DR-MP-01, rev E)
- Parameter plan – land use (ref. STN-GEN-SW-DR-MP-07, rev D)
- Proposed access arrangement (ref. P22-2466)

Documents submitted in support

- Planning statement (including planning obligations draft heads of terms), prepared by tor&co
- Design and access statement, prepared by Stantec
- Landscape and visual impact assessment, prepared by BMD
- Statement of community involvement, prepared by tor&co
- Desk-based heritage assessment, prepared by tor&co
- Flood risk assessment and drainage strategy, prepared by PJA
- Transport assessment, prepared by Pegasus Group
- Framework residential travel plan, prepared by Pegasus Group
- Ecological impact assessment, prepared by EAD
- Biodiversity net gain metric, prepared by EAD
- Outline waste management strategy plan prepared by Mayer Brown
- Arboricultural impact assessment, prepared by BMD
- Energy and sustainability statement, prepared by Daedalus Environmental
- Geo-environmental site investigation report, prepared by BRD
- Lighting Impact Assessment, prepared by The Lighting Bee

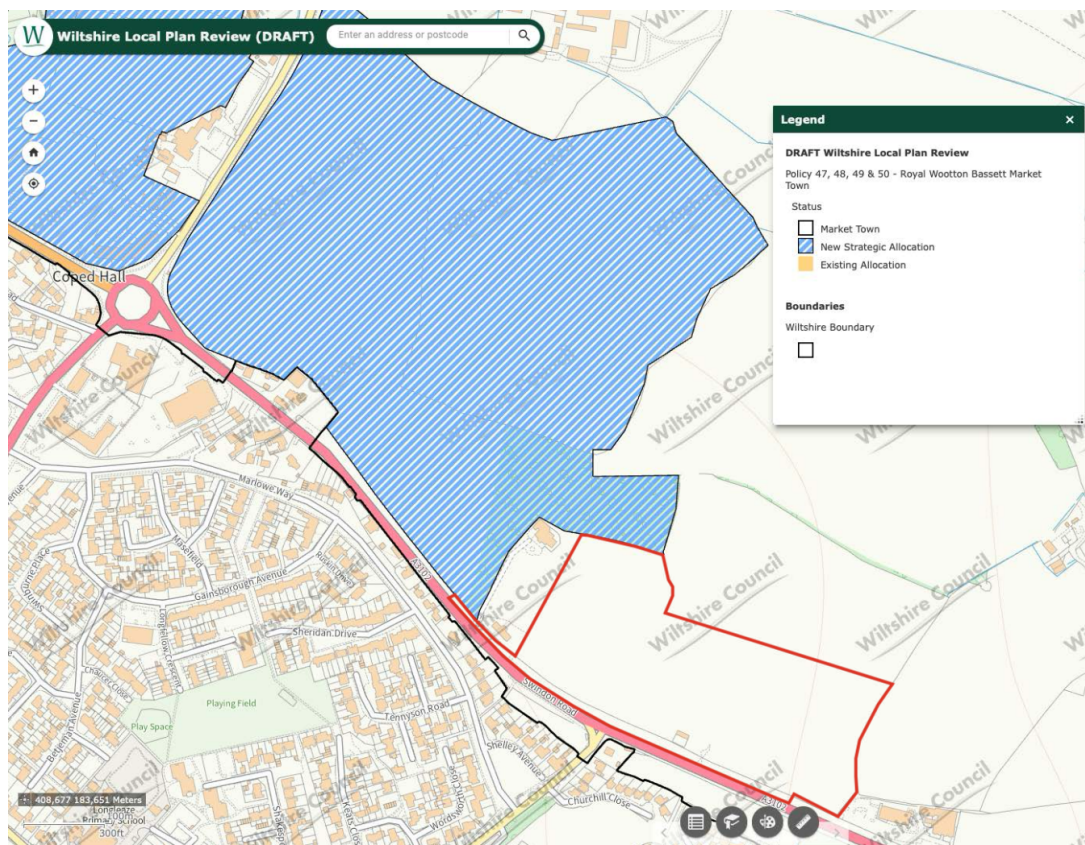
- Utility statement, prepared by BTS
- Air quality assessment, prepared by Cass Allen
- Noise assessment, prepared by Cass Allen
- Tree constraints plan (ref. 1989-TCP-001-A, rev A)

2.0 Site and its surrounding

Application site details

- 2.1 The application site extends to approximately 6.5 hectares and comprises a single agricultural field. It is enclosed on all sides by existing vegetation including trees and hedgerow planting. The site lies on the northern settlement edge of Royal Wootton Bassett, with Swindon Road defining the southern boundary and existing residential development lying beyond.
- 2.2 Elmcroft House, an existing residential property, lies immediately to the west. To the east, lies the Churchill Hotel and its car park, alongside agricultural land and a solar array. To the north, the site is bordered by additional agricultural land and hedgerows, with the M4 motorway lying further to the north.
- 2.3 The site is located to the east of the draft local plan allocation at Midge Hall Farm (draft policy 49) and a current planning application on that site (WC reference: PL/2025/02340), as shown on the extract from the online draft policies map below.

Figure 1: Extract from the draft policies map showing the application site in relation to the draft Local Plan allocation (policy 49)



- 2.4 The site is in a sustainable location for residential development being located on the northern edge of Royal Wootton Bassett, a designated market town within the Wiltshire Core Strategy (WCS), and a second-tier settlement to the three principal settlements. The site is within walking and cycling distance of a

range of local facilities and amenities, including both primary and secondary schools.

- 2.5 Royal Wootton Bassett also benefits from its close proximity with Swindon. Coped Hall Business Park, situated to the north of the town and in proximity to the site, further contributes to the employment provision.
- 2.6 The site currently has no dedicated pedestrian or cycle infrastructure along its immediate frontage, with the exception of a short 115m footway on the southern side of the carriageway. There is no footway on the northern side adjacent to the site, however a footway will be introduced as part of the development to ensure there is safe pedestrian connection between the site and nearby schools, and the town.
- 2.7 There are no statutory designated sites within or adjacent to the Site, and there are no European- designated sites (Special Areas of Conservation, Special Protection Areas or Ramsar Sites) within 10km of the Site.
- 2.8 Four statutory sites of nationally designated importance occur within 5km of the Site, including three Sites of Special Scientific Interest (SSSIs) and one Local Nature Reserve (LNR). The closest of these is Jubilee Lake LNR; located approximately 0.9km to the north-west. The Site lies within a SSSI 'Impact Risk Zone' in respect of residential development.
- 2.9 Six non-statutory Local Wildlife Sites (LWS), one Wiltshire Wildlife Trust (WWT) reserve and two Protected Road Verges (PRV) occur within 2km of the Site; the closest is Jubilee Lake Fields LWS, which lies approximately 0.8km north-west.
- 2.10 Designated heritage assets within a 1km radius of the site include two scheduled monuments and eight grade II listed buildings. Additionally, the Wootton Bassett conservation area is located 955 metres south west of the site boundary. The closest designated heritage assets to the site comprise the, as well as The Marsh (LB2) and Midge Hall (LB3), both also grade-II listed.
- 2.11 The proposed development site contains two designated heritage asset, the grade-II listed milestone located opposite Noremarsh Road (LB1) and the scheduled monument called post mill at Church Hills (NHLE number 1018126), located within the northern part of site. The Wiltshire Historic Environment Record (HER) records the scheduled monument as a windmill mound (TOR 42) and it records a series of undated earthworks (TOR 40), partly within the site and extending to the north west.
- 2.12 A comprehensive tree survey has been undertaken in accordance with the British Standard. This identifies a total of eight individual trees, two tree groups, six hedgerows and one area of woodland within the site.
- 2.13 The site lies within Flood Zone 1 and therefore has a low risk of fluvial flooding. It also assessed as being at very low risk of canal and reservoir flooding, and at low risk of tidal, surface water, groundwater and sewer flooding.

3.0 Relevant planning history

- 3.1 There is no relevant planning history for the application site itself.
- 3.2 As noted in paragraph 2.3, the neighbouring site to the west is a draft allocation in the emerging Wiltshire local plan and is subject to a planning application for up to 425 dwellings (reference: PL/2025/02340), with all matters reserved except for access from Hook Road and Swindon Road. This application remains under consideration.

EIA screening

- 3.3 In July 2025, a request for an Environmental Impact Assessment (EIA) Screening Opinion was submitted to WC for the proposed development of up to 135 Dwellings on the site.
- 3.4 WC issued its decision in September 2025, confirming that an EIA was not required (ref. PL/2025/06027).

Pre-application engagement

Pre-application advice request

- 3.5 In accordance with paragraph 40 of the National Planning Policy Framework (NPPF) (December 2024, as amended), the applicant submitted a formal request for pre-application advice to WC in June 2025 (ref. ENQ/2025/01114). While some internal consultation responses were received, no meeting has been offered by the appointed case officer to date, and no formal written advice has been received. The applicant has reviewed the feedback received and responded accordingly, and in the absence of the meeting and formal pre-application advice, has decided to proceed with the submission of the application.

Public engagement

- 3.6 The submitted Statement of Community Involvement (SCI), prepared by tor&co, summarises the outcomes of the public consultation undertaken. A dedicated project website launched in July 2025 provided information on the emerging proposals and enabled local residents to submit feedback, register for updates and indicate support. A total of 1,214 flyers were distributed to local households, signposting to the website and providing contact details for further comments.
- 3.7 In total, 80 responses were received. Key concerns related to infrastructure capacity, including traffic on the A3102 and Stoneover Lane, as well as pressures on local healthcare, schools and utilities. Respondents also stressed the importance of accessible open space, inclusive play provision, and the protection of wildlife, countryside views and local character.
- 3.8 Some respondents expressed conditional support particularly where development would deliver affordable housing, smaller homes (such as 1-2 bedroom dwellings and bungalows), and high-quality, sustainable design.

- 3.9 All feedback was reviewed and thematically analysed to inform the evolution of the scheme. Section 6.0 of the SCI sets out the changes made to the proposals following the consultation.

4.0 The proposed development

Introduction

4.1 This planning application is made in outline with all matters reserved except access. Full details of the site layout, scale, appearance, access, and landscape treatment will be the subject of future consideration through a separate reserved matters (RM) application.

4.2 The proposed description of development is as follows:

‘Outline planning application with all matters reserved except for access for up to 135 dwellings, the creation of new vehicular access with footways from Swindon Road, provision of informal and formal open space, together with associated highways, landscape, earth works and level changes, foul and surface water drainage facilities, utilities provision and other associated and necessary infrastructure.’

4.3 The application includes the following drawings for approval, which, along with the development description, establish the framework for the detailed design of the proposals

- Site boundary plan (ref. STN-GEN-SW-DR-MP-01, rev E), prepared by Stantec
- Parameter plan – land use (ref. STN-GEN-SW-DR-MP-07, rev D), prepared by Stantec
- Proposed access arrangement (ref. P22-2466) prepared by Pegasus Group

4.4 The application is also supported by a range of technical reports.

Overview

4.5 Land North of Swindon Road provides an opportunity to create a sustainable and attractive extension to the market town, inspired by the context of and local character of Royal Wootton Bassett.

Design approach

4.6 The land use parameter plan (ref. STN-GEN-SW-DR-MP-07, rev D), prepared by Stantec, illustrates the distribution of proposed land uses across the site. The parameter plan accommodates up to 135 dwellings, 40% of which will be delivered as affordable housing.

4.7 The parameter plan, for which approval is sought, provides 2.47 hectares of public open space incorporating attenuation basins, a play area and informal and formal open space. The illustrative masterplan, within the Design and Access Statement (DAS), demonstrates how the Wiltshire Open Space Standards (2023) can be met on site, ensuring the delivery of accessible, well-connected and high-quality open spaces in accordance with local requirements.

4.8 The vision for the site is to provide play space and a trim trail, through a nature-based play environment that are connected through a network of spaces across the site. The landscape treatment of the open space will be informed by existing

character and designed to integrate fully with the development while enhancing the setting of the scheduled ancient monument, as described in detail in the DAS.

- 4.9 The majority of existing hedgerows and trees will be retained, with a 5-metre buffer from built form where feasible, to protect habitats. The parameter plan incorporates these features within the development layout. Where hedgerow loss is unavoidable, compensatory planting and habitat creation will be delivered.
- 4.10 A comprehensive landscape strategy has been developed to retain and enhance existing trees and hedgerows, supplemented with new planting and green infrastructure corridors. Locally appropriate native species will be used to reinforce the distinctive pattern and character of the site. This approach will help assimilate the development into its setting and deliver biodiversity benefits.
- 4.11 Building heights and layout have been informed by the site's topography, (130-137 AOD), ensuring that built form remains in keeping with the surrounding context. This will ensure that the development does not break the tree line or dominate wider views.

Access and movement

Proposed access arrangement

- 4.12 Access to the site for all modes is proposed via a ghost island priority right-turn lane junction, located approximately 115 metres east of Stoneover Lane, as shown on the submitted Proposed Access Arrangement plan (Ref. P22-2466) prepared by Pegasus Group. The access is in the approximate location of the existing gated field access to provide appropriate junction separation to Stoneover Lane and has been sited in consideration of the vertical profile of Swindon Road.
- 4.13 Swept path analysis of the junction for a refuse vehicle, the largest vehicle anticipated to regularly service the site, is presented in Figure 4.2 of the submitted Transport Assessment (TA).
- 4.14 An additional access for pedestrians and cyclists is proposed approximately 120 metres west of Stoneover Lane, also shown on the access arrangement plan, which can also operate as an emergency access.
- 4.15 The access road will comprise a six-metre-wide carriageway with three-metre-wide footways/cycleways on both sides. The western footway/cycleway is proposed to end immediately west of the site access but is designed not to prejudice future connections to the Council's footway/cycleway proposals linking Royal Wootton Bassett and Swindon.
- 4.16 The eastern footway/cycleway will continue along the northern side of Swindon Road for approximately 320 metres, providing a potential link between the proposed development and the adjacent Midge Hall Farm site.
- 4.17 A controlled Toucan crossing point is proposed around 170 metres west of the proposed access, enabling safe pedestrians/cyclists access to existing infrastructure, including local bus stops to the south.

- 4.18 The footway on the southern side of Swindon Road within the vicinity of the site will be widened to three metres will connect to the existing footway on Stoneover Lane. This will include the removal of an existing vehicle layby located on the northern side of Swindon Road, with all works to be undertaken within existing public highway.
- 4.19 Visibility splays at the proposed junction can be provided in accordance with the recorded 85th percentile speeds, including wet-weather adjustments (summarised in Table 2.2 within the TA), and in accordance with the DMRB guidance for a 40mph speed limit. This is shown on the submitted proposed access arrangement plan.
- 4.20 It is anticipated that an extension of the 40mph speed limit on Swindon Road could be promoted in due course, subject to completion of the Traffic Regulation Order (TRO) process.

Internal road network

- 4.21 The internal road network will be determined at reserved matters stage. It is anticipated that road layouts will generally follow Manual for Streets (2007), Manual for Streets 2 (2010) and the Wiltshire Design Guide (2024), or any other prevailing guidance at the time.

Parking

- 4.22 Car and cycle parking provision will be confirmed at reserved matters stage but is anticipated to follow WC's parking guidance. All dwellings will be provided with Electric Vehicle charging points in accordance with national and local guidance.

Travel plan

- 4.23 A Framework Residential Travel Plan (FTP) is submitted as a standalone document. It outlines initial measures to reduce single occupancy vehicle use by future residents. The FTP will form the basis of a Full Travel Plan, which will be secured as part of a Section 106 agreement or planning condition.

Conclusion

- 4.24 The TA confirms that the site is well-located with appropriate walking, cycling and public transport links, providing genuine alternatives to single occupancy travel in accordance with both Paragraph 110 and Paragraph 115 of the NPPF.
- 4.25 The TA concludes that the development can be accessed by all modes, and that the trip impact will not materially affect the existing safety or operation of the local highway network.
- 4.26 The TA concludes that there are no highway or transportation constraints identified that would prevent the proposed development.

Housing delivery statement

- 4.27 The proposed development makes provision for up to 135 new homes, offering a range of sizes, from one-bedroom apartments to larger family homes. Of these homes, 40% will be made affordable in accordance with Core Policy 43

(CP43) *Providing affordable homes* of the adopted Core Strategy. These will potentially include First Homes, affordable / social rent, and shared ownership properties. Exact details of the size and mix of the open market homes and the tenure of affordable housing will be discussed and agreed upon with WC during the determination of the application.

- 4.28 The intention is to ensure a policy-compliant type, mix and size of homes are provided to meet the local housing need and promote a diverse community.
- 4.29 The precise location of the affordable housing units will be agreed at the RM stage, but WC's guidance recommends that they should be provided in clusters of no more than 15 units to achieve integration within the development.
- 4.30 As summarised below, but detailed in the supporting technical reports, the site is free from any exceptional constraints to development.

Biodiversity and ecological enhancement

- 4.31 An Ecological Impact Assessment (EclA) has been prepared by EAD Ecology to assess the ecological implications of the proposed development.
- 4.32 Baseline surveys identified the following in relation to protected and notable species:
- Common and widespread invertebrate species were recorded, and significant populations of notable species are unlikely
 - eDNA samples from ponds within 250m of the site tested positive for great crested newt (GCN). Site itself provides sub-optimal terrestrial habitat for GCN and common amphibians, including common toad
 - No reptiles or hazel dormouse were recorded and are both assumed to be absent
 - Suitable nesting habitat is present for widespread bird species, Priority Species such as dunnock, song thrush and whitethroat
 - No badger setts were identified, although mammal tracks indicate occasional foraging or passage by a badger
 - At least eight bat species were recorded foraging and commuting within the site, including low numbers of Myotis species, lesser horseshoe bat, long-eared bat species and barbastelle. Activity was highest along the northern boundary of the site, which provides the most valuable habitat for foraging and commuting bats
 - Two trees on the northern boundary were identified as having 'High' (PRF-M; suitable for multiple bats) bat roost suitability, though further surveys confirmed no roosts. One building in the south of the site had 'Low' bat roost suitability, and surveys confirmed the presence of a likely day roost of individual or small numbers of pipistrelle species (common and widespread bat species); this is a low conservation status roost
 - Site supports suitable habitat for brown hare and hedgehog. Brown hare was confirmed to be present, but the site is of limited importance for this species. Hedgehog presence is assumed. Habitat for polecat and harvest mouse is sub-optimal, but their presence is considered possible.

- 4.33 The proposed development incorporates an integrated landscape and ecological strategy, including new hedgerow and tree planting, wildflower meadow, native scrub planting and SuDS ponds with associated wetland habitats.
- 4.34 Through these measures the development will achieve a biodiversity net gain of 1.43 Habitat Units (+10.54%) and 1.20 Hedgerow Units (+16.30%), as set out in the submitted Statutory Biodiversity Metric.
- 4.35 Measures to avoid, mitigate and compensate negative effects and deliver ecological enhancement include:
- Construction management measures to prevent pollution through dust, surface-water runoff and ground water
 - Retained hedgerows and mature trees protected from disturbance during construction through the use of temporary barriers in accordance with BS5837:2012
 - Construction would be implemented under a Natural England Great Crested Newt District Level Licensing (DLL) Scheme. Through this Scheme, off-site compensation habitat for great crested newt would be delivered through Natural England
 - Pre-construction badger survey to confirm the absence of badger setts within the Site. Any newly dug setts that would be damaged or disturbed during construction would be subject to a Natural England Badger Development Licence, to enable temporary or permanent closure prior to the start of construction
 - Construction-management measures would be adhered to during construction to protect badger welfare, and that of other mammals potentially present on-site
 - Site clearance (including hedgerow and scrub removal) undertaken outside of the bird- nesting season or preceded by a search of suitable habitats for nesting birds
 - No lighting would be left on during the night during the construction period. Any security lighting would be positioned at low-height and motion activated on short-timers. The lighting design for the development would ensure that lighting impacts to bats were minimised, including maintenance of a dark corridor along the northern boundary
 - Removal of the building with a bat roost would be subject to a Natural England Bat Mitigation Licence
 - Provision of bat and bird habitat (e.g., bat tubes/bricks, swift boxes) within new dwellings
 - A destructive search for hedgehogs would be undertaken prior to the removal of suitable habitats. Hedgehog passes created within new garden fences to allow hedgehogs to move around and through the site.
- 4.36 A Construction and Ecological Management Plan (CECoMP) will be prepared to detail measures to ensure habitat and species protection during construction. A Habitat Management and Monitoring Plan (HMMP) will be prepared to detail how retained and proposed habitats will be managed in the long-term.

Trees

- 4.37 The submitted Arboricultural Impact Assessment (AIA), prepared by BMD, evaluates the direct and indirect impacts of the proposed development upon existing trees. Where necessary, the AIA provides details of mitigation and tree protection.
- 4.38 The landscape strategy has been designed to retain and integrate existing trees wherever possible. However, some conflict is unavoidable due to access and visibility requirements. The development will require:
- The partial loss of 1no. tree group of C category retention value
 - The partial loss of 1no. hedgerow
 - G2 (mixed species) will be cut back on the southern side to allow clearance for the new footpath and access visibility splays. The partial loss of this scrub-like group will be of a negligible impact to the site or the wider setting
 - H1 (mixed hedgerow) will be partially removed in 4no. small sections to accommodate vehicular and pedestrian access from Swindon Road. The combined area of hedgerow removal totals approx. 20metres. The sections of hedgerow removal will not be of a harmful impact to the character and appearance of the area.
- 4.39 The landscape proposals will compensate for the removals and offer a significant improvement to the existing canopy cover across the site. None of the trees proposed for removal are afforded statutory protection by a TPO or Conservation Area. The trees are not considered aged or veteran and therefore the principles for refusal of development proposals on such grounds within the NPPF (para. 193(c)) would not be considered applicable.
- 4.40 The AIA provides an overview of the recommended tree protection measures including:
- Tree protection fencing (TPF) to form a construction exclusion zone (CEZ) to protect the retained trees during construction. The indicative location of the TPF is illustrated on the draft tree protection plan at appendix 3 of the AIA. A recommendation of the specification of the TPF is provided at appendix 4. The CEZ will be in place prior to the commencement of works on site and will not be removed until confirmation from WC
 - Construction of a self-binding gravel footpath within the RPA of T1 (common ash), which can be achieved without adverse impact to the tree subject to a sensitive methodology outlined in the AIA
 - Minor surface works proposed within RPAs will not be of a detrimental impact to the health and vitality of trees subject to the recommendations within the AIA
 - Recommendations for safely installing utilities and services within RPAs.

Sustainability and energy

- 4.41 The energy and sustainability statement, prepared by Daedalus Environmental, describes how the proposed development will adopt sustainable construction principles with a focus on climate change mitigation and adaptation. The statement demonstrates how the scheme aligns with relevant national and local

policy requirements and confirms the Applicant's commitment to delivering a highly sustainable development.

4.42 The proposals have been designed to achieve the Future Homes Standard and WC's requirements. Key measures include:

- A fabric-first approach to achieve highly energy efficient dwellings, with building orientation maximised for solar gain where possible
- No natural gas connection to the site
- Heating and hot water will be supplied via highly efficient low carbon air source heat pumps which will be complemented with roof integrated solar PV panels
- The dwellings will therefore be 'zero carbon ready' from the outset and on a trajectory to become operationally zero carbon over time
- High quality broadband will be provided in line with Approved Document R
- Accessibility to local services and sustainable transport options will encourage residents to prioritise active travel and public transport
- Electric vehicle charging points provided in line with policy
- Buildings will be designed and specified to adapt to a changed climate:
 - Overheating will be managed through considered design
 - Retention of existing trees and additional planting will provide more comfortable microclimates in warmer weather
 - Landscape strategy delivering multi-functional benefits, supporting increased biodiversity and enhancing the overall aesthetic
 - Integrated SuDS to manage surface water
- The development will employ a combination of highly efficient fixtures, fittings and appliances to reduce domestic water use to achieve the 110 l/p/d target
- Embodied carbon will be reduced by applying sustainable design principles, including informed material selection and the use of re-used and recycled materials during construction
- Construction and operational waste will be managed in line with the principles of the Waste Hierarchy.

4.43 The final design solution and associated detail will be provided at RM stage.

Surface and foul water drainage

Surface water drainage

4.44 The submitted Flood Risk Assessment and Drainage Strategy, prepared by PJA, confirms that surface water from the proposed development will be through a new attenuation basin, with controlled discharge to the ordinary watercourse along the eastern boundary of the site at a rate of 8.9l/s. This represents a 30% betterment on the greenfield runoff rate (QBar).

4.45 In addition, a conveyance swale is proposed along the northern extent of the developable area. Further multifunctional SuDS features will be considered and integrated at the reserved matters stage to ensure compliance with the required water quality standards.

- 4.46 The report demonstrates that the proposed development can be delivered sustainably and that, with the implementation of the proposed drainage strategy, flood risk will not be increased on-site or elsewhere, satisfying the requirements of the NPPF.

Foul water drainage

- 4.47 The foul drainage strategy sets out two potential solutions for the management of foul flows. The preferred option (Option 1) is a new gravity connection to Manhole 4931 to the east of the site. Alternatively, a pumped connection (Option 2) could be provided to the existing public foul sewer in Stoneover Road via a new rising main. Discussions with Wessex Water are ongoing to agree the final point of connection for the development.

External lighting

- 4.48 The submitted lighting impact assessment, prepared by The Lighting Bee, confirms that the proposed external lighting strategy has been designed to be minimal and sensitive while still meeting adoptable standards for roads, footpaths and other key areas of the development. All lighting will be in accordance with industry standards, guidance and recommendations to ensure an adequate level of illuminance for security, safety and amenity throughout the site, whilst limiting obtrusive light, over-lighting, energy consumption and impacts on ecological receptors.
- 4.49 The site is classified as Environmental Zone E3, and the proposed lighting will adhere to the parameters for this zone. Additional mitigation measures are also proposed to further reduce impacts to ecological receptors.
- 4.50 Overall, the assessment concludes that the proposed lighting strategy will not give rise to significant impacts on sensitive receptors. A detailed lighting assessment, including calculations, will be submitted at the RM stage to demonstrate that light spill from street lighting, external lighting and internal light spill from buildings will meet the ecological requirements identified in the assessment.

Noise

- 4.51 The submitted noise assessment, prepared by Cass Allen, presents the results of a noise and vibration survey carried out at the site in accordance with relevant local and national planning guidance. Noise and vibration levels at the site are dictated by road traffic noise emissions from Swindon Road.
- 4.52 The assessment has been undertaken in line with ProPG guidance.
- 4.53 The findings confirm that the proposed development is considered to be acceptable subject to the incorporation of acoustically upgraded glazing and ventilation and acoustic screening around gardens. These measures will be refined further at the detailed design stage and secured through a suitably worded planning condition.
- 4.54 Compliance with noise criteria in Building Regulations Part O has also been considered. The report advises some bedrooms will need to be designed so that windows can remain closed at night without the room overheating; this will be addressed and confirmed at the detailed design stage.

- 4.55 Ground-borne vibration levels at the site have been measured and are considered suitable for residential development.
- 4.56 Overall, the assessment concludes that the site is suitable for the development in noise and vibration terms, subject to the imposition of suitably worded planning conditions where necessary.

Waste management

- 4.57 As set out in the submitted outline waste management strategy, prepared by Mayer Brown, it is the intention that waste will be 'designed out' at each of the design process for the development and that sustainable waste management facilities and integrated recycling infrastructure will be integral to the final scheme.
- 4.58 With regards to construction, a detailed site waste management plan will be developed by the contractors using the following principles:
- The SWMP will operate within Construction Management Plan and will establish the waste responsibilities within the management team
 - Waste management recycling targets will be set that are specific to the development proposals
 - Procedures will be set for waste classification/determination of material as inert, non-inert and hazardous
 - Dedicated material storage areas and collection arrangements for waste requiring off-site disposal will be provided
 - Good site management and careful construction scheduling will minimise the generation of unused materials
 - A Materials Management Plan will be completed, declared and submitted to the Environment Agency for approval, prior to commencement.
- 4.59 Operationally, the development will provide waste and recycling facilities in accordance with Wiltshire's guidance, with a Detailed Operational Waste Management Plan to be submitted at Reserved Matters stage.

Utilities

- 4.60 The submitted utility assessment, prepared by BTS, confirms that the development can be suitably served by existing electricity, potable water, sewage and telecommunications connections, with further investigation required to confirm the capacity for the electricity, potable water and foul water.
- 4.61 Pre-application enquiries have confirmed that connections to the existing 11kV and 33kV network can be made, subject to diversions and a legal crossing agreement for the 33kV cable.
- 4.62 Thames Water (TW) has confirmed the capacity to supply the first 50 of the proposed 135 dwellings, and that these can be supplied from the existing mains in Stoneover Lane. TW can carry out network modelling and upgrade planning as the application process progresses. TW has a statutory obligation to provide water to all new homes and as such, we can assume that all the units can be connected.

- 4.63 With regards to a foul water connection, a formal foul capacity enquiry has been made to Wessex Water (WW) by the Applicant to progress the modelling of a gravity connection to the existing WW network. A manhole located in Swindon Road near the Churchill Pub (MH4931) has been identified as a possible point of connection.
- 4.64 No gas connection is proposed as the development will only use electricity in compliance with the Future Homes Standard.

Archaeology and built heritage assessment

- 4.65 The submitted desk-based heritage assessment, prepared by tor&co, provides an outline of the archaeological potential of the site and study area and examines the effects of any historic or existing impacts upon that potential.

Built heritage and historic landscape

- 4.66 The assessment concludes that the proposed development will result in less than substantial harm to the significance of designated heritage assets through development affecting their setting. This means that paragraph 215 of the NPPF is engaged, requiring any harm to be outweighed by the public benefits of the scheme. The significant public benefits include:
- Delivery of 135 new homes across a broad range of types and sizes, including policy-compliant affordable housing. This will make a significant contribution to meeting identified local housing needs and to improving WC's five-year housing land supply
 - Provision of publicly accessible formal and informal open space, offering recreation and amenity benefits for both new and existing residents and supporting healthy, active lifestyles
 - A reduction in existing surface-water-related issues affecting neighbouring residents, achieved through the implementation of a comprehensive, controlled site-wide drainage strategy
 - Economic benefits arising from construction activity alongside longer-term expenditure from new residents that will support local shops, services and community facilities
 - Financial contributions secured through the Section 106 agreement assist in delivering local infrastructure, services and community improvements.
- 4.67 A series of mitigation and design principles have been formulated for the scheme to ensure the protection and appreciation of the scheduled monument and its wider setting.
- No development will take place on the monument itself, ensuring its fabric and form are fully protected
 - A 50m buffer zone will be established around the scheduled monument to restrict built form in its immediate vicinity
 - The buffer zone will provide green open space, a play area, and integrated cycle and footpaths
 - An interpretation board will be installed within the buffer area to share information on the scheduled monument and its history, enhancing local understanding and appreciation

- Enhanced vegetation boundaries will be introduced to further protect and visually frame the heritage asset.

Archaeology

- 4.68 The desk-based assessment identified that overall, there is a high potential for archaeological remains to be present within the site. Following correspondence with the County Archaeologist, it was agreed that a programme of archaeological trenching would be undertaken prior to the submission of this planning application. In September 2025, Curra Terra completed the evaluation works, which comprised the excavation of 43 trenches. This confirmed evidence of historic agricultural activity and former field boundaries within the site, no further remains associated with the post mill scheduled monument were identified.
- 4.69 An area of concentrated archaeological activity was recorded in the eastern part of the site, likely representing medieval occupation or land use. Limited evidence of Romano-British date was also recorded, though these remains were of low archaeological significance and reflective of dispersed, low-status rural settlement activity identified in the wider landscape.
- 4.70 The evaluation confirmed that the potential for significant prehistoric or early-medieval remains within the site is low, with any surviving features likely to be residual and of limited archaeological interest. The medieval and post-medieval evidence aligns with the known agricultural use of the site and the wider pattern of rural activity associated with Royal Wootton Bassett.
- 4.71 The results of the archaeological investigations will inform a proportionate and robust mitigation strategy. This will include an appropriate programme of investigation and recording, and the preparation of an archaeological management plan to ensure the long-term protection and positive management of the post mill scheduled monument and its setting.
- 4.72 The County Archaeologist has confirmed that further mitigation will be required, which can be appropriately secured by means of a condition attached to any planning consent granted.

Conclusion

- 4.73 The submitted desk-based assessment concludes that, subject to the implementation of an appropriate mitigation strategy, the proposed development will not result in any significant adverse effects on known or potential heritage assets and that the archaeological interest of the site has been adequately considered in accordance with national and local policy requirements.

5.0 The Development Plan

- 5.1 Section 73 of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the Development Plan unless material planning consideration indicate otherwise.
- 5.2 The development plan relevant to the application is comprised of:
- The Wiltshire Core Strategy (adopted January 2015)
 - The saved policies of the North Wiltshire Local Plan 2011 (adopted June 2006, saving direction June 2009)
 - Wiltshire and Swindon Core Waste Strategy (2006-2026).
- 5.3 The extent to which the proposed development complies with the policies contained in the development plan is set out below.
- 5.4 Reference is included to the Royal Wootton Bassett Neighbourhood Plan, the boundary of this plan lies adjacent to the site. However, the site is not in the Neighbourhood Plan Area and therefore this document is not part of the development plan for this site.
- 5.5 Other material considerations include the NPPF December 2024, that sets out the Government planning position and is critical to this case as set out in section 6 of this statement.

Wiltshire Core Strategy

Strategy for growth

- 5.6 The Wiltshire Core Strategy (WCS) was adopted in January 2015 and sets out the spatial strategy for Wiltshire over the period 2011-2026.

Delivery strategy

- 5.7 WCS Core Policy 2 (CP2) establishes the delivery strategy and requires provision of *at least* 42,000 new homes. The WCS includes strategic allocations to cover the plan period, but there is only one in Royal Wootton Bassett for 100 dwellings at Rugby Club, Stoneover Lane.
- 5.8 The site is outside of the defined settlement boundaries set by the WCS. Policy CP2 provides the policy framework for development outside defined settlement boundaries. It states that development outside the “*defined limits of development*” will not be permitted unless those limits are altered through the identification of sites for development in subsequent site allocation or neighbourhood plans. The site is not allocated for development in the site allocations document or the neighbourhood plan.
- 5.9 However, WCS CP2 also recognises that its housing figures are indicative and should be applied with flexibility. Paragraph 4.20 states that “*the indicative figures also allow a flexible approach which will allow the council... to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development.*” In

considering that the Council confirmed in a Planning Committee report dated 21st of January 2025 that Wiltshire has a significant housing land supply shortfall, the relevance of this policy in evaluating the proposals contribution to housing need and delivery is clear.

- 5.10 The proposed development conflicts with WCS CP2 as it lies outside the defined settlement boundary and is not an allocated site. Nonetheless, the scheme is in accordance with the overarching requirements to deliver development to meet needs in a sustainable manner and given local housing need (discussed in detail in section 6) this should be considered within the planning balance.

Other relevant policies of the Core Strategy

Housing

- 5.11 Core Policy 45 (CP45) *Meeting Wiltshire's housing needs* mandates that residential development should incorporate a range of types, tenures and sizes of homes. Whilst the specific details on dwellings and tenure are yet to be confirmed and will be considered at the RM stage, it can be noted that the proposed development will incorporate a variety of housing types and tenures, ranging from 1 to 5-bedroom homes in accordance with this policy.
- 5.12 CP43 sets a requirement for sites of five or more dwellings to provide at least 40% affordable housing for sites within this zone. The development is proposing to meet this requirement and will deliver a policy-compliant level of affordable housing.

Design and quality

- 5.13 Core Policy 57 (CP57) *Ensuring high quality design and place shaping*, requires a high standard of design to be adopted across all new developments, including making a positive contribution to the retention and enhancement of existing important landscaping and natural features, making efficient use of land, maximising opportunities for incorporation of sustainable construction techniques, and for major applications to be accompanied by a design and access statement (DAS).
- 5.14 A DAS has been submitted as part of this application, detailing how the site is suitable for development and proposing parameters to address the above considerations within the design. The Wiltshire Design guide (WDG), a Supplementary Planning Document (SPD), formally adopted in by the Council in March 2024 sets out key expectations for new housing and mixed-use developments. This has been considered in detail throughout the DAS and the development of this scheme.
- 5.15 The proposal presents a sustainable and environmentally conscious design as set out in the Energy and Sustainability report, that integrates energy efficiency and climate responsive features from the outset. Building orientation maximises natural daylight and passive solar gain, while a relatively low-density layout limits overshadowing between dwellings.
- 5.16 Together these measures align the development with CP57.

- 5.17 CP57 also requires development to achieve appropriate levels of residential amenity, including protection from noise and vibration.
- 5.18 As outlined in section 4.0 of this statement, the submitted noise assessment confirms that the proposed development is acceptable in acoustic terms, subject to mitigation. These measures will be refined further at the detailed design stage and secured through a suitably worded planning condition.
- 5.19 Compliance with Building Regulations Part O has also been considered. The assessment identifies that some bedrooms will require the ability to maintain closed windows at night to prevent overheating; this will be addressed through detailed design.
- 5.20 Ground-borne vibration levels at the site have been measured and are considered suitable for residential development.
- 5.21 Overall, the noise assessment confirms that the site is suitable for residential development and that any required mitigation can be secured by condition.

Landscape

- 5.22 Core Policy 51 (CP51) *Landscape* dictates how proposals should protect, conserve, and enhance the existing landscape character of the local area, and must not create any harmful impacts on the landscape, to be mitigated appropriately where unavoidable.
- 5.23 The landscape strategy for the proposed development has been informed by the existing landscape and visual context of the site and surrounding area and draws upon principles and objectives established within the WCS. It identifies approaches to landscape protection and enhancement which are both sensitive and considerate of the sightlines to and from the proposed development.
- 5.24 The proposed public open spaces and green ecological corridors are key features of the development. They will provide a range of informal landscape planting and treatment, as well as public open space to take account of their relationship to the surrounding landscape and market town context, whilst building on opportunities for further amenity provision for the future residents onsite. These multi-functional and accessible spaces will create social settings for new and existing residents, offering a safe and effective amenity space with clear natural surveillance from the adjacent properties and will offer the optimum setting for local wildlife and biodiversity to flourish in line with ecologist recommendations. Open space is therefore considered a vital provision to support the health, well-being, and social cohesion of the forthcoming local community, representing a core vision of the development.
- 5.25 The landscape and visual impact assessment (LVIA) prepared by BMD considers the potential landscape and visual effects as a result of the proposed development upon:
- Landscape character, including physical landscape resources
 - Views and visual amenity experienced by people.
- 5.26 The LVIA draws together the landscape and visual baseline information and summarises the key mitigation and enhancement measures, forming part of the

iterative design process and maximising the positive influence of the Proposed Development on its surrounding context. Landscape and visual effects have been assessed following three stages: during construction; immediately on completion (Year 0); and during operation after establishment of landscape mitigation (Year 15).

- 5.27 The assessment concludes that landscape effects have been assessed to be of Moderate Adverse within the Site at Construction stage and at Completion (Year 0), reducing to Minor / Moderate Adverse at Year 15. At the district level, effects on landscape character would be Minor Adverse within LCA 3 Swindon Fringe and LCT Urban Fringe Scarp at all stages.
- 5.28 Visual effects at the construction stage and at completion (Year 0) have been assessed to range between Moderate to Minor Adverse at locations close to the Site such as on Swindon Road and nearby Public Rights of Way or on Public Rights of Way at vantage points in the local landscape within 2km. Effects on more distant views including those from Lydiard Park (Registered Park and Garden) would be Negligible. Operational effects in the long term (Year 15) would be no greater than Minor Adverse as the landscape scheme matures and filters views or screens the development from view.
- 5.29 As described in the LVIA Methodology at Appendix A, Major and Substantial effects are considered to be material to decision making, with Moderate effects having the potential to be material to decision making. Based on the above summaries of the assessment, it is considered that the proposed development accords with the landscape and visual requirements of planning policies and guidelines and can be accommodated without giving rise to important material landscape and visual effects.
- 5.30 CP51 also requires proposals to protect against intrusion from light pollution. As outlined in Section 4.0 the submitted lighting assessment concludes that the proposed lighting strategy will not give rise to significant impacts on sensitive receptors. A detailed lighting assessment, including calculations, will be submitted at the RM stage to demonstrate that light spill from street lighting, external lighting and internal light spill from buildings will meet the ecological requirements identified in the assessment.

Heritage

- 5.31 Core Policy 58 (CP58) Ensuring the conservation of the historic environment emphasises that development should 'protect, conserve, and where possible enhance the historic environment.'
- 5.32 In terms of built heritage and historic landscape, as set out in Section 4.0 of this planning statement and the submitted desk-based heritage assessment, the proposed development would result in less than substantial harm to the significance of designated heritage assets through effects to their setting. Paragraph 215 of the NPPF is therefore engaged, requiring any harm to be outweighed by the public benefits of the scheme. These public benefits are summarised at paragraph 4.70 of this statement.
- 5.33 Regarding archaeology, the submitted desk-based heritage assessment confirms there is a high potential for archaeological remains to be present within the site. Following consultation with the County Archaeologist, an agreed programme of trenching was carried out prior to the submission of this

application. This confirmed evidence of historic agricultural activity and former field boundaries, with no further remains associated with the post mill scheduled monument identified.

- 5.34 Concentrated archaeological activity was recorded in the eastern part of the site. Limited evidence of Romano-British date was also recorded, though these remains were of low archaeological significance and reflective of dispersed, low-status rural settlement activity identified in the wider landscape.
- 5.35 The evaluation concluded that the potential for significant prehistoric or early-medieval remains within the site is low, with any surviving features likely to be residual and of limited interest. The identified medieval and post-medieval evidence aligns with the known agricultural use of the site and the wider pattern of rural activity associated with Royal Wootton Bassett.
- 5.36 The findings of the archaeological investigations will inform a proportionate and robust mitigation strategy, including an appropriate programme of investigation and recording, and the preparation of an archaeological management plan to ensure the long-term protection and positive management of the post mill scheduled monument and its setting. The County Archaeologist has confirmed that further mitigation will be required, which can be appropriately secured by means of a condition attached to any planning consent granted.
- 5.37 Overall, the proposed development has been carefully designed to avoid, minimise, and mitigate impacts on the historic environment and archaeology. Any less-than-substantial harm to heritage assets is outweighed by the significant public benefits of the scheme, and appropriate mitigation measures will ensure the long-term protection and management of archaeological features. The proposals therefore fully accord with Core Policy 58 and relevant national planning policy.

Highways and access

- 5.38 Core Policy 60 (CP60) *Sustainable transport* states how WC will support developments which reduce reliance on vehicular travel, through an avoidance of parking spaces to be provided, whilst still ensuring adequate provision for residential properties. The policy encourages the installation of EV charging points and advocates for the enhancement of sustainable, safe, and efficient movement within and to development sites, via the improvement of pedestrian and cycle links, and access to public transport options.
- 5.39 The site is located on the edge of the market town of Royal Wootton Bassett and has been established as a suitable location for this scale of development, with no constraints in highways and access terms. The proposal aligns with the policy by facilitating a modal shift away from private cars by enhancing pedestrian and cyclist connectivity across the site and making provision to access to public transport from the site, encouraging and making accessible non car journeys. As set out in the Energy and Sustainability Statement submitted as part of this application, all the proposed dwellings with associated parking will have dedicated EV charging points. Additionally, dedicated visitor parking spaces will also include charging provision, supporting the transition to low emission travel.
- 5.40 Core Policy 61 (CP61) *Transport and new development* requires that development should minimise the need to travel by car and promote

sustainable transport options. The policy sets out a hierarchy of users, prioritising disabled people, pedestrians, cyclists, and public transport over goods vehicles, powered two-wheelers, and private cars. The submitted Transport Assessment (TA) demonstrates that the site is well-located with safe access for all users and provides opportunities for residents to travel sustainably, offering a genuine alternative to single-occupancy car journeys in accordance with Paragraphs 110 and 115 of the NPPF.

- 5.41 To further encourage sustainable travel, a Framework Residential Travel Plan (FTP) has been submitted as a standalone document. This sets out initial measures to reduce single-occupancy vehicle use, which will form the basis of a Full Travel Plan to be secured via a Section 106 agreement or planning condition.
- 5.42 Core Policy 64 (CP64) *Demand management* sets out that the provision of parking associated with well-designed residential development will be based on minimum parking standards. The proposed development scheme has been designed to meet these minimum parking standards and is, therefore in accordance with this policy. The precise layout of the scheme and associated parking provision will be the subject of a future reserved matters application.
- 5.43 Core Policy 62 (CP62) *Development impacts on the transport network* requires developments to provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. The TA concludes that suitable access to the site can be provided for all modes, and that the trip impact associated with the development proposal will not have a material effect on the existing safety or operation of the local highway network. There are no valid highway or transportation reasons which should prevent the proposed development.
- 5.44 Overall, the proposals demonstrate full compliance with the relevant transport policies, promoting sustainable and accessible travel, providing safe access for all users, while mitigating any potential impacts on the local highway network.

Drainage

- 5.45 Core Policy 67 (CP67) *Flood Risk* requires all new developments to include measures to reduce the rate of rainwater run-off and improve rainwater infiltration (SuDS) unless site or environmental conditions make these measures unsuitable.
- 5.46 The submitted FRA and Drainage Strategy confirm the proposed surface water drainage provides a sustainable solution and will help minimise flood risk across the development. This will be achieved through the construction of SuDS in the attenuation basins, as well as multifunctional SuDS features to provide sufficient water quality treatment.
- 5.47 The proposal therefore complies with this policy.

Ecology

- 5.48 Core Policy 50 (CP50) *Biodiversity and geodiversity* require development proposals to demonstrate how they protect features of nature conservation and geological value as part of the design rationale, and all development should seek opportunities to enhance biodiversity where possible.

- 5.49 As set out in section 4.0 of this statement, the proposed development incorporates an integrated landscape and ecological strategy, including new hedgerow and tree planting, wildflower meadow, native scrub planting and SuDS ponds with associated wetland habitats.
- 5.50 The Biodiversity Net Gain (BNG) metric submitted with this application confirms that the development will achieve the 10% mandatory biodiversity net gain requirement. Specifically, the proposals deliver 1.43 Habitat Units (+10.54%) and 1.20 Hedgerow Units (+16.30%).
- 5.51 Further, the submitted Ecological Impact Assessment (EclA) identifies measures to avoid, mitigate, and compensate for any potential adverse ecological effects, all of which will be implemented as part of the development.
- 5.52 In summary, the proposed development fully complies with CP50 by protecting existing ecological features and delivering measurable biodiversity enhancements.

Sustainability

- 5.53 Core Policy 41 (CP41) *Sustainable construction and low-carbon energy* seeks to encourage new development to incorporate design measures to reduce energy demand and for properties to be well insulated as appropriate to achieve this.
- 5.54 The submitted energy and sustainability statement, prepared by Daedalus Environmental, describes how the proposed development will adopt sustainable construction principles with a focus on climate change mitigation and adaptation. The statement demonstrates how the scheme aligns with relevant national and local policy requirements and confirms the Applicant's commitment to delivering a highly sustainable development.
- 5.55 The energy and sustainability measures are summarised in section 4.0 of this statement. The final design solution and associated detail will be provided at RM stage.
- 5.56 The scheme is therefore compliant with policy CP41.

Air Quality

- 5.57 Core Policy 55 (CP55) *Air quality* requires development proposals that may exacerbate existing areas of poor air quality to demonstrate that effective mitigation can be implemented to protect public health, environmental quality and amenity.
- 5.58 The submitted air quality assessment, prepared by Cass Allen, confirms that the site is suitable for residential development in air quality terms. The site is not within or near an Air Quality Management Area (AQMA), and existing air quality is primarily influenced by traffic emissions from Swindon Road. The M4 to the north is also likely to influence local background pollutant concentrations.
- 5.59 Potential construction phase dust soiling and particulate matter (PM: PM10) health effects were assessed qualitatively, resulting in Medium and Low Risk levels being identified, respectively, in the absence of mitigation. Suitable best

practice mitigation measures have been recommended within the report, and no significant residual air quality impacts are expected.

- 5.60 A detailed atmospheric dispersion modelling exercise was undertaken to predict nitrogen dioxide (NO₂) and PM (PM₁₀ and PM_{2.5}) concentrations at relevant sensitive receptor locations within the study area during the operation of the development. The results show that these pollutant levels will be below the relevant Air Quality Objectives (AQOs), with no requirement for additional mitigation.
- 5.61 Overall, the AQA concludes that the proposed development will not give rise to unacceptable air quality effects and that there are no air quality constraints to the granting of planning permission. The proposal, therefore, accords with Core Policy 55.

Contamination

- 5.62 Core Policy 56 (CP56) Contaminated land requires development proposals to demonstrate that any land contamination can be effectively mitigated to protect public health, environmental quality, the built environment and amenity. It also requires confirmation that the site is, or can be made, suitable for its proposed end use.
- 5.63 The findings and recommended actions set out in the submitted Geo-Environmental Site Investigation report, prepared by BRD, demonstrate that the site can be made suitable for its proposed residential use, subject to further investigation at the appropriate stages of development. With these measures secured through appropriately worded planning conditions, the proposal accords with the requirements of Core Policy 56.

Saved policies of the North Wiltshire Local Plan 2011, adopted June 2006

- 5.64 Whilst a number of policies in the plan are saved, the plan is time-expired, inconsistent with the NPPF and out of date in that it does not allocate land to meet present needs. The policies it contains (including H4, which restricts housing development outside the settlement boundaries) should be afforded very little, if any.
- 5.65 Nevertheless, the proposed development also accords with the following saved policies in the NWLP.
- 5.66 Policy NE14 seeks to protect landscape features such as hedges and trees where they can successfully and appropriately be incorporated into the design. Landscape features have been incorporated into the design, including the retention of boundary hedgerows where practicable.
- 5.67 The submitted Arboricultural Impact Assessment (AIA) evaluates the current state of trees on the site, detailing their condition and categorising them according to their retention value. The survey identified eight individual trees, including predominantly semi-mature common ash and hawthorn, with two silver birch beyond the western boundary. A couple of trees show extensive canopy decline due to ash dieback. The survey documented two groups of category C trees, primarily comprising scrub-like trees and outgrown vegetation, along with six hedgerows in good to fair condition that provide important low-level screening, boundary containment and habitat corridors. A woodland of

category B retention value, located off-site beyond the northwest boundary, shows good initial establishment and potential long-term value.

- 5.68 The proposed design has sought to incorporate the existing trees / hedgerows and minimise the requirement for any removal. However, due to access and visibility requirements, there is some conflict with trees and hedgerows, which is considered unavoidable. The proposed development will therefore require the partial loss of one group of category C trees and some sections of hedgerow. None of the trees proposed for removal are aged/veteran or afforded statutory protection by a TPO or Conservation Area, and as the scale of removal is limited, the loss is considered to have a negligible impact on the site and its wider setting. The landscape proposals will also compensate for the removals and offer a significant improvement to the existing canopy cover across the site.
- 5.69 Policy T5 seeks to protect public rights of way. There are, however, no public right of way locations on the site.
- 5.70 Policy CF3 requires new housing development to make provision for open space on site. The illustrative masterplan demonstrates this provision of required open space.

Wiltshire Reg 19 Local Plan

- 5.71 WC is currently preparing the Wiltshire Local Plan Review (WLPR). The plan was submitted to the Secretary of State for examination in November 2024 and stage 2 hearings commenced in November 2025, however the Planning Inspectors examining the plan have paused these sessions due to the level of additional work required and the implications that may have on the strategy.
- 5.72 As such, the plan is still at a relatively early stage. There remain unresolved well-founded objections to the Local Plan and serious concerns about the consistency of the plan with the NPPF. Therefore, it carries very limited weight.
- 5.73 The site is not allocated for development within the Reg 19 draft plan. However, the plan sets the *minimum* number of houses that should be provided over the plan period (although it should be noted this is based on the previous standard method, the plan benefiting from transitional arrangements) and has an expectation that non-allocated sites will also contribute towards housing delivery.
- 5.74 Policy CP1 (now P1) remains relatively unchanged, except for minor wording.
- 5.75 Policy CP2 (now P2) has been updated to reflect a new delivery strategy to provide at least 36,740 homes over the plan period (2020 and 2038), to be split into three phases. There are serious objections to this element of the plan due to inconsistency with the NPPF.
- 5.76 As noted above, the Plan is being considered under transitional arrangements, following the December 2024 update to the NPPF, and therefore has not met the housing requirement identified using the new standard method. The Council's latest 5YHLSS (base dated April 2024) confirms that under the new Standard Method Wiltshire's housing need is 3,525 dpa, which would be a requirement of 63,450 over the plan period.

- 5.77 Revised P2 further states that proposals for development at Market Towns will be supported within and on the edge of settlement boundaries were identified in the Area Strategies, and that additional housing allocation may also be identified through neighbourhood plans.
- 5.78 CP51 is to be replaced by Policy 91 *Conserving and enhancing Wiltshire's landscapes* and reinforces the need to maintain an existing sense of place and landscape character within development, encouraging proposals to be designed to conserve and enhance existing views.
- 5.79 Policy 98 (formerly CP57) on *high-quality design*, remains relatively unchanged, with the addition of a new clause (vii) which encourages the incorporation of trees, parks, orchards, and SuDS. The proposed public open space, and attenuation basin support this aim of the new plan and will contribute towards the overall BNG onsite, which meets the required 10%.
- 5.80 CP60 on *Sustainable Transport* has been updated as Policy 70 and continues to support development proposals which promote active travel and enhance connectivity for pedestrians and cyclists. The new Local Plan provides an additional aim within this policy which advocates the increased delivery of EV charging points within forthcoming developments.
- 5.81 Policy 73 *Transport demand management* is proposed to replace CP64 and also provides additional measures to ensure the increased delivery of electric vehicle charging infrastructure, as well as a stronger encouragement to incorporate cycle paths and cycle parking within new development.
- 5.82 CP50 is proposed to be replaced by Policies 88 *Biodiversity and Geodiversity*, and 89 *Biodiversity Net Gain*. Policy 88 reiterates the values of CP50 to avoid and mitigate potential impacts of development on ecological networks, and to avoid disturbance to habitats. It integrates new requirements to incorporate a minimum of two integral bird nest bricks per dwelling, integrated bat boxes, overhanging eaves suitable for nesting, and hedgehog highways in all new development proposals. Other features such as native planting, and nature recovery in the public realm are encouraged within the updated position. Policy 89 states that development must achieve a minimum of 20% BNG (above the national target of 10%), however, this policy is yet to be tested at an examination.
- 5.83 Revised Policy 85 (formerly CP41) contains new requirements for residential development to achieve zero-carbon standards, through energy-efficient designs and increased use of renewables. The proposed dwellings onsite are proposed to be energy efficient and would therefore satisfy this requirement.
- 5.84 Policy 95 *Flood risk* is proposed to replace CP67 and provides an updated approach to flood risk management on development sites, including a requirement for all major development to achieve a 20% betterment on greenfield runoff rates. An emphasis is placed on the implementation of SuDS.
- 5.85 Policy 76 *Providing affordable homes* (formerly CP43), states a continued requirement for the delivery of at least 40% affordable housing on sites of 5 or more dwellings or 0.5ha or more in Designated Rural Areas. As per the Policies Map, the site is situated within this area and as such the policy will apply.

- 5.86 Policy 78 *Meeting Wiltshire's housing needs* (formerly CP45) highlights that housing development will be supported where the housing size and type reflect the needs of the local community within which the site is located.
- 5.87 The policies within the WLPR have received objections from third parties and the public examination has been halted pending further work and should therefore be attributed very limited weight at this stage. Significantly, even if adopted, due to the transitional arrangement the plan will fall seriously short of meet the new housing requirement for Wiltshire and therefore, great weight should be given to delivery of new housing to help meet this need.

Wiltshire and Swindon Core Waste Strategy (2006-2026)

- 5.88 The Wiltshire and Swindon Core Waste Strategy document forms one element of the wider Wiltshire and Swindon Minerals and Waste Development Framework and sets out the overarching strategy for waste management across the area.
- 5.89 Policy WCS5 requires that new developments demonstrate how the most sustainable options for waste management have been considered and incorporated into proposals.
- 5.90 Policy WCS6 further requires that development proposals provide suitable facilities to enable occupiers to recycle and compost waste, including space for the source separation and storage of different waste streams.
- 5.91 The accompanying energy and sustainability report details the waste management measures and confirms that the approach fully aligns with the policies set out in the Wiltshire and Swindon Core Waste Strategy.

Royal Wootton Bassett Neighbourhood Development Plan

- 5.92 The Royal Wootton Bassett Neighbourhood Plan (RWNP) was made in April 2018. The site is outside the neighbourhood plan area, but adjacent to it and therefore consideration is given to the plan from a design perspective, but it does not form part of the development plan for this site.
- 5.93 Whilst housing development is supported within the RWNP, local residents have emphasised they would like to see limited new development which reflects the character, appearance, materials and styles found in the town.
- 5.94 The community does however recognise a strong need to provide additional affordable housing in the local area, in particular starter homes to allow young people to get on the housing ladder.
- 5.95 Where new housing developments are provided, the RWNP supports the provision of high quality green open space, that is well maintained, safe and accessible. The development proposes to deliver 10% BNG, including the creation of public open spaces in support of this vision.
- 5.96 The RWNP also sets out requirements to ensure a mix of housing to meet local housing needs. The DAS and illustrative masterplan demonstrate how the local evidence of need, as provided by WC, can be incorporated into the scheme.

- 5.97 Whilst this application is in outline and not within the Neighbourhood Plan area, the key design principle are considered in through the DAS.

6.0 The National Planning Policy Framework and tilted balance

Principle of development

- 6.1 The NPPF sets out the government's objective to significantly boost the supply of homes to meet local needs, confirming that *"the overall aim should be to meet as much of an area's local identified housing need as possible"* (paragraph 61). This is a long-standing commitment that has been given greater emphasis recently in recognition that we are in *"the most acute housing crisis in living memory"* (Written Ministerial Statement 31 July 2024).

Updates to the Standard Method

- 6.2 The government published the current Standard Method for calculating housing need (SMCHN) on 12 December 2024. The SMCHN increases WC's annual requirement from 1,917 to 3,525 dpa resulting in a substantial shortfall of only 2.42 years supply (Housing Land Supply Statement Published June 2025). A significant and serious shortfall. This acute position triggers the presumption in favour of sustainable development set out in paragraph 11d of the NPPF.
- 6.3 What is more, the emerging Local Plan is being considered under the transitional arrangements, and therefore only provides for 36,740 homes compared to an identified housing requirement for 63,450. As such, even if the emerging plan proceeds through the examination process, it will not provide a remedy to address the housing need in Wiltshire.
- 6.4 WC accepts that it cannot demonstrate a five-year supply. In acknowledgement of the government's priority to boost significantly housing delivery (NPPF paragraph 61), a shortfall in housing land supply is serious concern. In this context, the NPPF is clear that the appropriate response from local authorities is to grant additional planning permissions in circumstances where the adverse impacts of doing so would not significantly and demonstrably outweigh the benefits (particularly when there are few if any, site constraints) (paragraph 11d as set out below).
- 6.5 Footnote 8 to paragraph 11 confirms that where authorities cannot demonstrate *"a five-year supply of deliverable housing sites"* policies should be considered 'out-of-date', which is the case here, and the presumption in favour of sustainable development is triggered (the engagement of the tilted planning balance), paragraph 11d) states:

"where there are no relevant development plan policies, or the policies which are most important for determining an application are out of date, granting permission unless:

- the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing development proposed; or*
- any adverse impacts of granting permission 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.”

- 6.6 This application should be supported on the basis that it will provide much needed new homes to address the acute and serious shortfall of homes in Wiltshire. As discussed further in this section, and through the application material, the site represents sustainable development that would make the effective use of this well-located site. There are no policies, identified in footnote 7 that would present development or provide a strong reason for refusal. It is noted that footnote 7 includes designated heritage assets but as discussed in the Desk-Based Heritage Assessment and below, the built and archaeological heritage assets do not present a strong reason for refusal.

Sustainable development

- 6.7 The following section assesses the scheme against the key objectives of the NPPF, demonstrating that it would deliver clear economic, social and environmental benefits in line with national policy. These benefits should carry significant weight in the planning balance.
- 6.8 Paragraph 7 of the 2024 NPPF states that the purpose of the planning system is to contribute to the objective of sustainable development and defines sustainable development as *“meeting the needs of the present without compromising the ability of future generations to meet their own needs”*.
- 6.9 Paragraph 8 goes on to state that achieving sustainable development means that the planning system has three overarching objectives; an economic objective, a social objective and an environmental objective, and that these objectives should be delivered through the preparation and implementation of plans, and the application of policies in the framework.
- 6.10 A key aspect of achieving sustainable development is ensuring that major development provides affordable housing to meet local needs (paragraph 66). As set out in early in this statement, the proposed development will deliver affordable housing in accordance with the development plan policies and designed to meet local needs, meeting this requirement. These social benefits should be afforded significant weight. Further benefits are discussed below in regard to the relevant sections of the NPPF.

Building a strong and competitive economy (NPPF section 6)

- 6.11 One of the three dimensions of sustainable development is the economic role which is defined in paragraph 8 of the NPPF as *“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”*.
- 6.12 It is the government’s position that housing construction contributes significantly to the economy and therefore provides economic benefit. Statistics from the Home Builders Federation suggest that 135 homes would:
- Support the employment of approximately 469 people

- Provide approximately 5 apprentices, graduates or trainees
 - Increase open space, community sport, and leisure spending by approximately £121,500
 - Generate approximately £3,600,000 in tax revenue, including £271,687 in council tax revenue
- 6.13 WC is failing to deliver sufficient new housing to meet current needs. It is essential to ensure that there is a sufficient mix of homes to meet needs, in addition to providing affordable homes and delivering economic benefits.
- Promoting sustainable transport (NPPF section 9, specifically paragraphs 110 and 115)**
- 6.14 Paragraph 109 of the NPPF sets out the transport issues that should be considered from the earliest stages of development proposals so that:
- “a) making transport considerations an important part of early engagement with local communities;
- b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;*
- c) understanding and addressing the potential impacts of development on transport networks;*
- d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;*
- e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and*
- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”*
- 6.15 Paragraph 110 goes on to state that the planning system should actively manage patterns of growth in support of these objectives, but that “*opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan making and decision making.*”
- 6.16 The proposed development realises the opportunities presented by the existing and emerging transport infrastructure along the A3102 corridor, providing new pedestrian and shared cyclist pathways as well as direct connection to the bus stops. These measures ensure that residents have genuine alternatives to private car travel for local and longer journeys.
- 6.17 What is more, the site is well connected to local services and facilities, within suitable walking and cycling distance, and therefore will offer new residents a genuine choice in travel modes in accordance with paragraph 115. The accompanying Transport Assessment confirms that the development will deliver

safe and suitable access and will not give rise to any significant impacts on the transport network.

- 6.18 A framework residential travel plan is submitted with the application in accordance with paragraph 118 of the NPPF, the implementation of which will assist in reducing the overall level of car movements and help new occupants identify more sustainable modes of travel.
- 6.19 In accordance with paragraph 118 of the NPPF, this application is accompanied by a transport assessment. This concludes that:
- The site is located within reasonable walking and cycling distance of a large range of facilities and services and is a sustainable site for development
 - The design layout of the site will encourage sustainable travel, which will be safe and suitable.
- 6.20 The Transport Assessment concludes that the development will have a limited impact on the local highway network, and any additional vehicle movements generated will not significantly adversely affect the operation of the local the A3102 Swindon Road. As such, the proposed developments meet the tests of the NPPF.

Achieving well-designed places (NPPF section 12)

- 6.21 The NPPF recognises that *“the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development”* (paragraph 131).
- 6.22 The DAS submitted with the application demonstrates that the masterplan has sought to create an inclusive and well-connected community as well as a development that responds to its surroundings and local context. The proposal will make the most efficient use of this sustainable site, in accordance with paragraph 129 of the NPPF. The mix and type of new homes to be provided remain to be agreed with WC, but it will help provide a variety and choice in the market. As such the proposed development will achieve a well-designed place that will add to the overall quality of the area.
- 6.23 Paragraph 133 of the NPPF recognises the importance of design guides and codes and that these can be prepared to support a planning application, as is the case in this instance.

Promoting healthy and safe communities (section 8)

- 6.24 Section 8 of the NPPF recognises the role to be played by the planning system to *“achieve healthy, inclusive and safe places”* (paragraph 96).
- 6.25 In accordance with paragraph 96 of the NPPF, the proposed development makes provision for generous public open space to enable and support healthy lifestyles and provides open market and affordable homes within a permeable layout providing clear and legible pedestrian and cycle connections.
- 6.26 The proposed development is therefore overall considered to satisfy the NPPF objectives because:

- The mix of proposed uses and their arrangement, as shown on the illustrative masterplan, will provide opportunities for meetings between members of the community and will create active street frontages
- The illustrative masterplan has taken account of the need to deliver a safe and accessible environment by proposing a series of clear and legible pedestrian routes, with high quality public open space overlooked by development
- The provision of open space will encourage outdoor activity and therefore a healthy lifestyle, benefitting new and existing residents, as well as encourage interaction between residents and aid in developing a sense of community

Meeting the challenges of climate change and flooding (section 14)

- 6.27 Section 14 of the NPPF highlights the importance of planning in helping “*to support the transition to net zero by 2050, and take full account of climate impacts including overheating, water scarcity, storm and flood risks and coastal change.*” (paragraph 161).
- 6.28 The FRADS submitted with this application confirms that the site is located in flood zone 1 and concludes that the risk of flooding at the site has been adequately managed via the implementation of SuDS to comply with this policy and to ensure that offsite flood risk is not exacerbated as a result of the proposal.

Conserving and enhancing the natural environment (NPPF section 15)

- 6.29 Section 15 of the NPPF requires planning decisions to “*contribute to and enhance the natural and local environment*” in a manner of ways, including “*providing net gains for biodiversity*” and the protection of designated sites (paragraphs 187 and 189).
- 6.30 The Biodiversity Net Gain Assessment submitted with the application demonstrates that the proposed development seeks to maintain and enhance biodiversity onsite through the retention of species-rich hedgerows and trees where possible, landscape planting.

Conserving and enhancing the historic environment (NPPF section 16)

- 6.31 Section 16 of the NPPF emphasises the importance of considering the impacts on the historic environment and in particular designated heritage assets. The application is accompanied by a Desk-based Heritage Assessment.
- 6.32 The assessment concludes that archaeological below ground remains have been identified, since then a programme of evaluation trial trenching, has been conducted in accordance with an approved Written Scheme of Investigation. Subject to the implementation of an appropriate mitigations strategy, the proposed development will not result in any significant adverse effect on known or potential heritage assets, and that the archaeological interest of the site has

been adequately considered in accordance with national and local policy at this stage.

- 6.33 In regard to built heritage and the historic landscape, the report concludes that less than substantial harm to the significance of the designated heritage assets through development affecting their setting. In accordance with paragraph 215 of the NPPF this harm must be outweighed by the public benefits. As set out through this document, the delivery of much need housing in a sustainable location is a significant public benefit, particularly given the housing land supply position in Wiltshire and the housing requirement, that outweighs the less than significant harm identified to the heritage assets.

Summary

- 6.34 The site will make an important contribution towards WC's five-year housing land supply, addressing the shortfall and will provide the following benefits:
- The residential development proposal would assist Royal Wootton Bassett in addressing the urgent demand for market and affordable housing in the local area
 - The provision of a policy compliant 40% affordable housing to meet local needs and contribute towards local housing supply
 - The introduction of publicly accessible open spaces, play space, new planting, and an overall biodiversity net gain of at least 10%
 - Dedicated Electric Vehicle charging for 100% of dwellings with associated car parking spaces
 - The use of photovoltaics on dwellings to contribute towards net zero
 - 25% reduction in potable water usage against the national average
 - The limited environmental constraints associated with the development
 - The creation of new local employment opportunities during construction.

7.0 Infrastructure – Draft Heads of terms for planning obligation

7.1 As part of the planning permission for the proposed development at land north of Swindon Road, Gleeson anticipates entering into a section 106 obligation and section 278 agreement with WC concerning the following matters:

- The percentage, mix, tenure, phasing and transfer of affordable housing units.
- The phasing, management and maintenance arrangements for the delivery of public open space
- The phasing, management and maintenance arrangements for delivery of the surface water attenuation facilities
- Suitable triggers for the payment of a financial contribution towards the provision of primary and secondary school places arising from the proposed development
- Contribution per dwelling toward waste and recycling containers for each unit
- Any arrangements, as might be necessary and reasonable to contain in a legal agreement for the implementation and monitoring of the travel plan
- On and off-site highway works as identified within the Transport Assessment (in conjunction with the works proposed by WC)

7.1 All discussions will need to have regard to WC's Community Infrastructure Levy.

8.0 Conclusion and planning balance

- 8.1 This planning application submitted by Gleeson seeks outline permission (with all matters reserved except the means of access) for residential development at the land north of Swindon Road, in Royal Wootton Bassett. The site is well related to the built form of Royal Wootton Bassett, adjoining the settlement boundary and benefits from being close to Swindon.
- 8.2 There is no doubt that WC has a severe need for new homes that is not going to be remedied by the emerging Local Plan. The site is suitable and available for development now. The approval of the application would facilitate the delivery of high-quality new homes (including affordable homes) and public open space in a large market town close to a range of significant employment opportunities and existing facilities, services, retail and leisure opportunities. The development would foster opportunities for greater self-containment and help to deliver a more sustainable settlement pattern and the WCS vision. The proposed development would make a significant contribution towards meeting WC market and affordable housing needs in a sustainable extension to Royal Wootton Bassett.
- 8.3 The site's development of the scale and form proposed would be consistent with the scale of the settlement and opportunities for growth and contribute to the housing need in Royal Wootton Bassett in a sustainable manner. It would also meet the wider requirements of the housing market and the district as a whole.
- 8.4 Whilst the site lies outside the 'limits of development', it would deliver new homes in general accordance with the WCS aims set out in CP1, CP2 and CP13 and the proposed development is considered to deliver sustainable development that accords overall with the core planning principles set out in the NPPF and the WCS.
- 8.5 This growth should not be restrained by unwarranted caps on the development scale, particularly in the context of the minimum requirements, the current local housing need, and the Government mandate to "boost significantly" the supply of housing land.
- 8.6 In accordance with section 38 (6) of the Planning and Compulsory Purchase Act 2004, there are material considerations that indicate the development should be approved despite being contrary to some elements of the development plan, specifically the acute and serious shortfall of housing.
- 8.7 WC are not able to demonstrate a five-year supply of housing as required by the NPPF, with a current position of 2.42 years. In this circumstance, planning authorities are required to grant planning permission for development unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF, or specific policies in the NPPF indicate that development should be restricted.
- 8.8 While the detailed design would be confirmed at Reserved Matters stage, it has been demonstrated, through the application documentation, that a sustainable, landscape-led development of this scale could comfortably be accommodated on the site. The technical information submitted with the application demonstrates that there are no significant technical or environmental

constraints to the development of this site and that the site is suitable to deliver the development proposed, and where possible mitigation measures have been applied. There are clear social, environmental and economic benefits that would accrue from the proposed development when assessed against the NPPF.

8.9 The proposal will provide the following benefits:

- The delivery of much needed housing that is available now and would make a meaningful contribution to housing land supply across a range of types and tenures, in a sustainable location that would support the town and is consistent with the policy objective to boost significantly the supply of housing
- The delivery of a significant amount of affordable housing in a sustainable location
- The delivery of publicly accessible open space to benefit new and existing residents
- 100% of dwellings with associated parking will have dedicated EV charging points
- Net biodiversity gains of 10%, through ecological enhancement, diversification and habitat creation, improving the low value of the site
- Support for community facilities and local services and facilities through an increase in the local population
- Economic benefits through construction activities and increased local population
- Reduction in surface water drainage issues for neighbouring residents through greater control of surface water drainage from the site.

8.10 In conclusion, the application will provide very substantial benefits, including much-needed market and affordable housing in a sustainable location, which outweigh any harm and should therefore be approved without delay.