

Planning Statement

Application for Full Planning Permission for the Construction of 2 no. Dwellings

In respect of:

Land adjoining 'Windrush', High Road, Ashton Keynes, Wiltshire, SN6 6NX

On Behalf of:

Partridge Homes (Cotswolds) Ltd.

Date of Document

December 2025



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1.0 Introduction

- 1.1. McLoughlin Planning has been instructed by Partridge Homes (Cotswolds) Ltd. ("the Applicant") to prepare and submit a Full Planning Application to construct 2 no. dwellings at the unnamed site immediately to the south of the dwelling known as 'Windrush' on High Road, Ashton Keynes, Wiltshire, SN6 6NX ("the site").
- 1.2. The Applicant recently obtained approval of Permission in Principle (PIP) to construct two dwellings at the site (ref: PL/2024/08139) on 11 August 2025. This gives the Applicant the option to apply for Technical Details Consent (TDC) to add to their PIP approval to comprise a Full Planning Application. Alternatively, the Applicant is applying for Full Planning Permission, using the PIP approval as the planning policy foundation for the proposed development.
- 1.3. The purpose of this Planning Statement is to set out the planning justification reasons as to why Full Planning Permission should be granted. The Planning Statement is structured as follows:
 - **Section 2** – Site Description and Planning History
 - **Section 3** – Planning Policy Context
 - **Section 4** – Analysis of Planning Considerations
 - **Section 5** – Conclusion



2.0 Site Description and Planning History

Site Description

- 2.1. The site comprises a collection of dilapidated former agricultural buildings in the village of Ashton Keynes. The site is located on High Road towards the southern end of the village adjacent to a bungalow known as 'Windrush' on its northern boundary. The River Thames flows past the site near its southern boundary, with the new houses of Maisey Mews located further south of the site.
- 2.2. The proximity of the River Thames to the south of the site means that the site is mostly within Flood Zone 2, according to Environment Agency mapping data. The site is also within the Zone of Influence for the North Meadow Special Area of Conservation (SAC).

Planning History

- 2.3. The recent approval of Permission in Principle at the site for two dwellings is the only relevant planning decision for this application. The decision is summarised below.

Reference	Description	Decision
PL/2024/08139	Permission in Principle for the construction of 2 no. dwellings	Approved – 11 August 2025



3.0 Planning Policy Context

- 3.1. This Section of the Statement sets out the planning policies that are relevant to the pre-application enquiry. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states planning decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2. In this case, a significant material consideration is the fact that the Council is unable to demonstrate a five-year housing land supply, which renders the Development Plan out-of-date pursuant to footnote 8 of paragraph 11 d) of the National Planning Policy Framework. This will be discussed in greater detail below.

Wiltshire Core Strategy

- 3.3. The Core Strategy was adopted in January 2015 and is the primary Development Plan document for determining planning applications in Wiltshire. It provides up-to-date strategic planning policy for Wiltshire, covering the period up to the year 2026. The policies most relevant for dealing with the proposal are as follows:
- **Core Policy 1: Settlement Hierarchy** – Ashton Keynes is categorised as a Large Village. The policy states development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.
 - **Core Policy 2: Delivery Strategy** – this sets out the indicative housing requirements throughout Wiltshire, with the figure for the Malmesbury Remainder (excluding the town) as 510 dwellings.
 - **Core Policy 13: Spatial Strategy: Malmesbury Area** – this identifies Ashton Keynes as a Large Village which supports housing growth in accordance with Core Policy 1.
 - **Core Policy 50: Biodiversity and Geodiversity** – All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.
 - **Core Policy 57: Ensuring High Quality Design and Place Shaping** – A high standard of design is required in all new developments. Development is



expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

- **Core Policy 67: Flood Risk** – This states that: *"Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice."*

Ashton Keynes Neighbourhood Plan 2015 - 2026

- 3.4. The Neighbourhood Plan was made in May 2017, and it also forms part of the Development Plan for any application within Ashton Keynes. Policies HSP1 and HSP2 together support and allocate residential development at the AB Carter Haulage site. Planning permission was granted at the site for 10 dwellings in September 2022 (ref: 20/09696/FUL) and the development has now been constructed.
- 3.5. Policy HSP3 supports applications for residential developments on windfall and infill sites within the Settlement Boundary, subject to criteria regarding scale, form, amenity and access.

National Planning Policy Framework (NPPF)

- 3.6. The NPPF was most recently updated in December 2024 and is a material consideration in all planning decisions in England. This update led to an increase in Wiltshire Council's annual housing requirement, which in turn caused its five-year housing land supply to fall even further, with the shortfall figure confirmed as 2.42 years in a recent appeal decision dated 22 October 2025 (ref: 3363961).
- 3.7. The NPPF provides formal guidance to all parties involved in the planning system and covers a wide range of issues relating to sustainable development. The most relevant paragraphs within the NPPF for this proposal are summarised below.

Paragraph 11 c) - Presumption in Favour of Sustainable Development

- 3.8. For decision taking, Paragraph 11 c) states that sustainable development means *"approving development proposals that accord with an up-to-date Development Plan without delay."*



- 3.9. The term 'out-of-date' is defined in Footnote 8 of the NPPF and it states it applies to situations like the one Wiltshire Council is currently experiencing, where a local planning authority cannot demonstrate a five-year supply of housing. Therefore, if there were to be any conflict found with the Development Plan, planning permission should still be granted unless limb i. or ii. of Paragraph 11 d) below is applicable.

Paragraph 11 d) - Tilted Balance

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

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

Paragraph 14 - Neighbourhood Plans

- 3.10. *"In situations where the presumption at paragraph 11 d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:*
- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
 - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement."*
- 3.11. The Ashton Keynes Neighbourhood Plan was in May 2017 made over eight years ago and it contains policies and allocations designed to meet its identified housing requirement, thus satisfying both criteria. Therefore, with the Development Plan out-of-date pursuant to paragraph 11 d), the high threshold set out within paragraph 14 of allowing new housing development contrary to the Neighbourhood Plan, having significantly and demonstrably adverse impacts, does not apply to this application. In summary, the Neighbourhood Plan is also out-of-date.



Paragraph 168 - Planning and Flood Risk

- 3.12. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.



4.0 Assessment of Planning Considerations

4.1. The purpose of this section of the Statement is to set out why planning permission should be granted having fully assessed all of the relevant planning considerations, with each of the following taken in turn:

- Principle of Development
- Design and Layout
- Flood Risk and Drainage
- Biodiversity
- Highway Safety and Parking
- Effect on Living Conditions of Neighbouring Residents

Principle of Development

- 4.2. The principle of constructing two dwellings at the site was established when Permission in Principle (PiP) was granted by Wiltshire Council in August 2025. The Council acknowledged that, despite being contrary to the spatial strategy set out in the Core Strategy, material considerations outweighed this conflict, and the PiP was approved.
- 4.3. Purely in Development Plan terms, the location of the proposed development conflicts with Core Policy 1 of the Core Strategy because of the site's position outside of the Ashton Keynes Settlement Boundary. However, as detailed in the previous Section of this Statement, the Core Strategy and the Neighbourhood Plan are both out-of-date and the NPPF's presumption in favour of sustainable development is engaged, hence the PiP was approved on this basis.
- 4.4. Contextually, the site is very much within the built-up area of the village, with dwellings located to the north and south of the site. Most notably, the recently constructed 18 dwellings at Maisey Mews have extended the built form of Ashton Keynes further south, nearly 300 metres beyond the defined Settlement Boundary.
- 4.5. Ashton Keynes is defined as a Larger Village due to its service provision, which includes a primary school, village pub, village shop and village hall, all within reasonable walking/cycling distance of the application site. The site is a sustainable location, as confirmed by the case officer for the PiP application. The Inspector who allowed the 18 dwellings at Maisey Mews to the south of the application site was quoted by the



case officer, confirming that *"I find no fundamental conflict, therefore, with the spatial strategy of the development plan in this regard."* Maisey Mews is further from the village centre than the application site, therefore the proposed development is by definition a more sustainable location.

- 4.6. NPPF paragraph 11 d) i. states that planning permission should be granted for sustainable development such as this unless areas of particular importance provide a clear reason for refusing the development. In this case, the technical conflict with the Development Plan created by the site's position outside of the Settlement is not a clear reason for refusal because the Plan is out-of-date as this is outweighed by the site's sustainable location and its residential context. The proposal is therefore acceptable in principle, subject to addressing the other site-specific considerations, which will be undertaken in the following paragraphs of this section of the Statement.

Design and Layout

- 4.7. The dwellings located on High Road differ in their size and style, and there is no prevailing architectural character in this part of Ashton Keynes. The recently constructed 18 dwellings at Maisey Mews and Oaklake House to the south of the site have been constructed using reconstituted Cotswold stone and plain Cotswold shade roof tiles. The proposed dwellings would use similar materials to ensure they would integrate effectively into the street scene.
- 4.8. The two dwellings have been designed to mirror each other on their principal elevation, with a projecting gable on one side with a two-bay integral garage on the other. Two gabled dormer windows are to be located above the garage to break up the roof line and provide architectural interest to the roofscape. A lean-to section to the front will accommodate the front porch and part of the integral garage, while the dwelling will also have a matching lean-to on the rear elevation to provide additional kitchen/dining space at ground floor level.
- 4.9. The new dwellings would be seen as a continuation of the style of Maisey Mews and Oaklake House when entering Ashton Keynes along High Road from the south. Equally, when travelling south out of the village, the appearance of the two dwellings would assimilate with other new dwellings that have been built in the vicinity. The proportion and detailing of the dwellings are typical of detached properties found in the southern Cotswolds area. The development would draw on the local context and complement the locality, thus complying with the guidance contained in Core Policy 57.



Flood Risk and Drainage

- 4.10. The site is located within Flood Zone 2 due to its proximity to the River Thames, the origin of which is approximately 5 miles away from the site. As a result, the river is akin to a stream in its depth, flow and general appearance as it passes the application site along its southern boundary. In assessing the flood risk for the PiP application, the Council concluded the following:

"The additional details submitted demonstrate that development of the site could be achieved without the development being at risk from flooding or resulting in increased flood risk elsewhere. There is thus no objection to the proposal on flood risk grounds."

- 4.11. The PiP application was submitted with a Sequential Test, which demonstrated that there were no suitable alternative sites for new-build residential development within the Parish of Ashton Keynes, to which the Council agreed when approving the application. Since the PiP application was submitted, changes to the Planning Practice Guidance (PPG) mean that a Sequential Test is not required if a site-specific Flood Risk Assessment is being provided, which was the case for the PiP application, as it is for this application.
- 4.12. The Flood Risk Assessment and Drainage Strategy (FRA) provided by K-Ten Consulting confirms that future residents would remain safe through appropriate mitigation measures. Design flood levels indicate that the 1% Annual Exceedance Probability (AEP) level plus 35% climate change uplift is 83.02 metres Above Ordnance Datum (AOD), while High Road to the north sits at 83.50 metres AOD, ensuring a safe dry access/egress route during extreme flood events. The site also benefits from Environment Agency advanced flood warning systems, enabling proactive evacuation procedures.
- 4.13. The drainage strategy proposes a Sustainable Drainage Systems (SuDS)-based approach, aiming to replicate natural runoff and ensure no increase in flood risk off-site. Although infiltration potential is uncertain, an adjacent watercourse provides an acceptable discharge point if soakaways prove unsuitable. Attenuation is provided through tanked permeable sub-base (30% voids) and cellular storage (95% voids), limiting discharge to the calculated greenfield runoff rate of 0.3 litres per second (l/s) for all storms up to the 1-in-100-year event, plus 40% climate change. Hydraulic



modelling demonstrates that the system accommodates critical storm durations when combined attenuation is used.

- 4.14. Surface water quality requirements are met through permeable construction, which satisfies SuDS treatment indices relative to pollution hazard levels for low-risk residential land use. A detailed maintenance plan ensures long-term performance and system resilience. Overall, the FRA concludes that, subject to mitigation, the development is safe, compliant with Core Policy 67 and paragraph 168 of the NPPF, and will not increase flood risk elsewhere.

Biodiversity

- 4.15. The site is located within the Inner Zone of Influence (ZoI) of the North Meadow and Clattinger Farm Special Area of Conservation (SAC). In May 2023, Wiltshire Council adopted an Interim Recreation Mitigation Strategy (2023-28), which requires developers of new residential units to pay £811.75 per dwelling to fund the Mitigation Strategy to help mitigate against the 'recreational pressure' on the SAC that is generated by additional residential development within the ZoI.
- 4.16. The Mitigation Strategy requires a payment of £811.75 per dwelling. For the PiP application, the applicant signed a Section 111 Agreement committing to pay a total of £1,898.50 ($811.75 \times 2 + £275.00$ S.111 fee). Consequently, the location of the site within the Inner ZoI of the SAC will not preclude planning permission from being granted as this issue has already been dealt with.
- 4.17. A Preliminary Ecological Appraisal (PEA) enclosed with the application concludes that while most of the existing habitats are of low to moderate ecological value, further consideration and action are required for some protected species before development can commence. The work required for each relevant species is summarised as follows:
- Reptiles – The Reptile Survey enclosed with the application found that reptiles are likely to be absent from the site and therefore no impacts from the development are predicted.
 - Bats – The buildings and on-site trees were found to have negligible potential for roosting bats. Therefore, no further activity surveys are necessary, provided a suitable lighting strategy is implemented that maintains a dark corridor along the adjacent river.



- Otters and Water Voles – The River Thames is adjacent to the site and is a potential habitat for otters. Precautionary measures and a pollution prevention plan are recommended during construction to minimise disturbance or contamination.
 - Amphibians – A nearby pond scored 'good' for Great Crested Newt habitat suitability. The developer intends to use a District Licence from NatureSpace to mitigate the risk of an offence being committed during works, which negates the need for further surveys.
 - Birds – Nesting and foraging opportunities were found to be present across the site. Vegetation removal and building demolition should occur outside the bird nesting season (March to August inclusive) or be preceded by a pre-works survey to confirm the absence of active nests.
 - Other – The PEA recommends the incorporation of biodiversity enhancements into the new development, such as native plantings and nesting boxes for species such as Swifts and House Sparrows, to achieve a net gain in biodiversity.
- 4.18. Consequently, provided the recommendations of the PEA are followed, which can be secured by appropriately worded planning conditions, the development will comply with Core Policy 50 and national planning guidance relating to biodiversity.
- 4.19. A Biodiversity Net Gain (BNG) Preliminary Design Stage Report has also been provided which assesses the ecological implications of the proposal in terms of its ability to achieve BNG. The proposal requires the removal of most existing on-site habitats, including areas of neutral and modified grassland, tall ruderal vegetation, bramble scrub, individual trees, developed land and buildings. Although the highest-value ecological feature, the adjacent River Thames and its riparian zone, will not be disturbed.
- 4.20. Using the Statutory BNG Metric, the development generates a habitat net percentage change of -38.19%, representing a deficit of 0.18 habitat units required to meet the mandatory 10% BNG target. Hedgerow units remain unchanged, with a net percentage change of 0.00%, leaving a small additional requirement of 0.07 hedgerow units for compliance. Watercourse units also show 0.00% change, creating a further shortfall of 0.06 units to achieve the required gain.



- 4.21. Due to the fact that on-site opportunities for habitat retention or creation are insufficient to compensate for losses, biodiversity offsetting will be required. The Applicant will therefore secure off-site habitat creation or enhancement either through a habitat bank operator, a broker, or a trading platform to achieve the 10% uplift in BNG. Any off-site provision will be legally secured for a minimum of 30 years and registered on the national biodiversity gain sites register.

Highway Safety and Parking

- 4.22. The application is accompanied by a Transport Statement written by Helix Transport Consultants, which sets out that the development is acceptable. This is because it incorporates sufficient car and bicycle parking facilities in accordance with the Local Plan and the Local Transport Plan Cycling Strategy. The proposed vehicular access will achieve a junction geometry that is sufficient to ensure safe visibility for residents exiting the site. Finally, the total number of daily vehicle movements is likely to be in single figures, which would have a negligible impact on the capacity of the local highway network.

Effect on Living Conditions of Neighbouring Residents

- 4.23. The dwelling at Plot 1 is positioned at the northern end of the site, nearest to the dwelling known as 'Windrush', while the dwelling at Plot 2 is positioned at the southern end of the site, nearest the dwelling known as 'Oaklake House', on the other side of the river. The proposed location and orientation of the two dwellings will continue the linear pattern of development on the eastern side of the road. The distances between Plots 1 and 2 and the other aforementioned dwellings would not result in any inherent issues relating to light restriction, overbearing or privacy loss.



5.0 Conclusion

- 5.1. The purpose of this Planning Statement is to set out the reasons why full planning permission should be granted for 2 no. dwellings on the land south of 'Windrush' in Ashton Keynes. The principle of this development was established by the Council's approval of Permission in Principle (PiP) in August 2025.
- 5.2. This Statement has explained how the detailed proposal complies with the relevant local and national planning policies. The first three Sections of this Statement introduce the proposed development, establish the site context and planning history, and summarise the key local and national planning policies.
- 5.3. The fourth Section of the Statement sets out the main planning considerations following the establishment of the principle of development. The PiP application also established that development of the site could be achieved without it being at risk from flooding or resulting in increased flood risk elsewhere. The Applicant's FRA confirms this with the addition of a Drainage Strategy to ensure surface and foul water can be safely discharged.
- 5.4. The financial contribution to offset potential harm to the nearby SAC has already been paid as part of the PiP application. Therefore, in terms of biodiversity, it is now a case of managing on-site protected species through appropriate mitigation measures, which are set out in the enclosed PEA and can be secured by appropriately worded planning conditions. Off-site credits will be sourced to ensure a 10% uplift in BNG can be achieved as there is insufficient space to achieve this on-site.
- 5.5. This Statement has also found that there would be no harm caused in terms of safe operation of the location highway network, or to the living conditions of neighbouring residents. Consequently, with no other material planning considerations to analyse, the proposed development should be approved without unreasonable delay.



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