

5th December 2025

Our Ref: 857/A3/OA

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0117 930 0413

James Taylor
Principal Planning Officer
Wiltshire Council
Monkton Park Offices,
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Dear James,

REVISED PROPOSALS PURSUANT TO APPLICATION PL/2025/03672

LAND EAST OF BIDDESTONE LANE, YATTON KEYNELL

In connection with the full planning application for the above site, we are now pleased to submit the revised application details that have been the result of a prolonged period of work that has been undertaken since the consultation stage, which seeks to address issues raised as part of that process and provide clarity on a number of subject areas.

A document and drawing schedule are provided at Appendix A which lists the updated plans and documents, along with their revision numbers.

We will now go on to provide an overview of the amendments made in respect to the application proposals and set out how specific consultation responses have been addressed. Where relevant, we have flagged the consultee responses that we have specifically responded to under the various issue headings.

The Amended Proposals

Overall, the proposals have been altered to positively address the consultation comments received. In summary, the most significant changes are as follows:

- Enlargement of the flood compensation area at the southern end of site (with associated red line enlargement) and associated landscape proposals
- Revision to the layout of the western affordable block to remove courtyard parking and replace with a mix of parking in front and to the side of plots
- Some house type substitutions for certain plots so that they sit more comfortably within their curtilage
- Introduction of drystone walling to frontages of plots along the main spine road
- Extension of a tree lined street (single sided) around the corner of Plot 8
- Extension of the footpath around Plots 24-25 to provide a more legible walking link for occupiers on southeastern corner

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- Relocation of pump station further away from houses

Response to Consultees

We have set out below our response to each of the key statutory consultee responses that have been received in connection with the application, and where relevant, how additional information, plan amendments and design and other controls are proposed to address various points raised.

Each of the following headings sets out the key issue, and specifically the various consultee responses that it responds to.

Change to Red Line Plan

The red line boundary has been amended to incorporate the additional flood compensation area to the south of the site, as requested through discussions with the Lead Local Flood Authority. This ensures that all land necessary to deliver the agreed flood mitigation strategy is now included within the application site, allowing the compensatory works to be secured and implemented in full as part of the development proposals.

In addition, and for completeness, the red line has been updated to encompass the proposed access arrangements, including the works required within the public highway. As these revisions bring land within the control of the Highway Authority into the application boundary, we have served the requisite Notice on the Highways Authority.

Highways

The Local Highway Authority (LHA) commented on the proposed development on 16 May 2025 to confirm that the visibility splays at the proposed site access are appropriate to serve the development along with the Biddestone Lane/A420 junction, and that the junctions within the village are able to accommodate the proposed development.

Their response also raised matters to be addressed, including wider accessibility concerns, requirement to upgrade the local PRoW (YKEY15) and the need to connect to YKEY16 which itself connects to the existing facilities and amenities within the settlement. Further details were also requested in relation to the site layout. A meeting was held between the local highway and planning officers and the applicant's highways consultants (Pegasus) on 05 June 2025 to discuss the outstanding matters. It was agreed that the access strategy is suitable to serve the proposed development, that Yatton Keynell is agreed to have a variety of facilities and amenities (more than other villages in Wiltshire), that the proposed new footway on the alignment of PRoW route YKEY15 is appropriate and that YKEY16 is able to be widened to 1.8 metres.

Pegasus have provided a Transport Note (TN) to address the matters raised by the LHA, specifically the local and wider site accessibility, the nature and suitability of Biddestone Lane, and the proposed internal site layout.

The TN demonstrates that the scheme benefits from direct, walkable access to a wide range of local facilities including the primary school, shop, surgery, village hall and play areas. To address concerns about the condition of PRoW YKEY15, the TN confirms the delivery of a new 2-metre surfaced footway

along the route, ensuring an all-year-round connection into the village. Following further dialogue, highways officers have confirmed that this approach is acceptable in principle, and the applicant is also willing to contribute towards the widening, surfacing and lighting of YKEY16 where required.

The LHA had suggested that a link through third-party land (the recreation ground) near the village hall should be explored; however, the TN explains that this is not achievable due to landownership constraints. Notwithstanding this, the combination of the new surfaced link along YKEY15 and the ability to improve YKEY16 secures a continuous, safe and policy-compliant pedestrian route into the village, resolving the concerns raised about reliance on a mown verge and unadopted connections. The TN also notes that pedestrian demand from the development will be low and comfortably accommodated by existing and proposed infrastructure.

In relation to Biddestone Lane, the LHA raised concerns over carriageway width and the ability of the lane to absorb additional traffic. The TN provides updated traffic data showing that the lane already accommodates nearly 2,000 daily movements. Against this baseline, the development would add only around 30 two-way trips in the AM peak and 26 in the PM peak, equivalent to one additional vehicle every two minutes, which the TN concludes is not material. The LHA has already confirmed no objection to the A420 junction or to junctions within the village, and visibility splays at the site access are agreed as appropriate.

Finally, the LHA requested additional detail on the internal layout, including tracking, internal visibility splays, EV charging, cycle parking and boundary-adjacent parking widths. The TN provides all requested information through updated drawings and appendices, demonstrating that the layout is suitable for adoption and consistent with national design guidance. Having addressed each of the concerns raised in the consultation response, the TN concludes that there are no remaining transport or highway reasons to resist the development.

Housing Enabling

While the application provides the full 22 affordable homes, several aspects of the proposed affordable provision required amendment. These include adjustments to the tenure/unit size balance (with additional 2b4p houses needed and a reduction in 3b5p units), ensuring the stated floorspaces match the minimum 85% NDSS requirements, and revising plans for the adapted bungalow and ground-floor maisonette to meet M4(2) standards, with level-access showers and dedicated disabled parking. It was also suggested that some parking for the affordable plots should be relocated as they were not well associated with certain dwellings.

The Housing Enabling comments have been fully reviewed and addressed through amendments to the scheme. The tenure has been confirmed, and the unit size balance has been revised to align with the Council's requirements, with additional 2b4p houses now incorporated and a corresponding reduction in 3b5p units. All affordable unit floorspaces have been checked against the Nationally Described Space Standards and updated to ensure they meet or exceed the required 85% threshold.

Parking arrangements for the affordable plots have been rationalised to ensure that parking is clearly associated with each dwelling and appropriately located. Spaces that were previously detached or insufficiently related to the dwellings they served have been repositioned to provide convenient, well-overlooked, and directly attributable parking. Collectively, these changes ensure that the affordable

housing offer now meets the Council's expectations in full and delivers a policy-compliant, well-integrated element of the wider scheme.

Archaeology

The LPA Archaeologist advised that a geophysical survey should be undertaken, and followed by, depending on the results, archaeological trial trenching to test anomalies and confirm the site's archaeological character.

A geophysical survey was carried out which informed a written scheme of investigation for trial trenching which was agreed with the county archaeologist prior to commencing. The trial trenching has been completed which highlighted there was nothing of particular note recorded, with the area of potential archaeology within the south-west relating to quarrying and levelling activity of a likely modern date. Full details are set out in the accompanying report by Cotswold Archaeology (Dated December 2025)).

Ecology

The Council's Ecologist issued an objection pending further information regarding the following,

- Confirmation of Great Crested Newt mitigation via submission of a District Level Licensing Impact Assessment & Conservation Payment Certificate (IACPC); and
- A corrected statutory Biodiversity Net Gain metric with accurate baseline habitats, condition assessments and updated habitat plans.

In respect of BNG, clarification was also requested on whether the on-site ditch qualifies as a watercourse under the statutory metric, with all documents needing to align on baseline habitat values.

The ecological matters raised by the Council have now been fully responded to. A District Level Licence will be submitted to confirm Great Crested Newt mitigation for the development, addressing the first outstanding point in full. In parallel, the Biodiversity Net Gain (BNG) assessment is in the process of being updated to reflect the revised site layout, ensuring that all baseline habitats, their condition assessments, and the associated habitat plans are accurately represented in the corrected statutory metric. The revised report and metric will be submitted when available shortly.

Lastly, it is confirmed that the shallow ditches within the site do not meet the definition of a watercourse for the purposes of the BNG Regulations and are therefore not treated as such within the metric. This clarification ensures that the BNG outcome is both technically robust and policy compliant. Collectively, these updates resolve the issues raised by the Council's Ecologist and allow the application to proceed on a sound ecological basis.

POS

The POS and play requirements arising from the development have been reviewed in light of the Council's updated calculations. The scheme provides the required areas of on-site public open space, with in excess of the required 3,495m² integrated into the masterplan. However, given the site's immediate adjacency to the established recreation ground, which already accommodates equipped play provision serving the village, the inclusion of a further on-site equipped play area would not represent the most effective solution. Accordingly, the applicant proposes to meet the equipped play

requirement through the off-site financial contribution of £53,136.00 identified by the Council, securing improvements to the existing facilities within the vicinity.

In addition, whilst the development generates a need for 1,518m² of sports pitch provision, this will be addressed through the requested off-site financial contribution of £15,180.00, with the Council's Leisure Strategy Infrastructure Officer confirming the target site for investment. All on-site POS will be managed in perpetuity by a private management company in accordance with the Council's requirements.

PROW

The Public Rights of Way matters raised have been addressed directly through the access strategy set out within the Transport Technical Note. The PRow officer expressed support for exploring a route through the recreation ground; however, as confirmed in the TN, a pedestrian link across this adjacent land cannot be delivered due to landownership constraints. This position has already been discussed with the Local Highway Authority. Notwithstanding this, the applicant has indicated a willingness in principle to provide an informal mown path to the northern site boundary should officers consider this beneficial, although Pegasus has advised that this is not necessary given the scheme already secures a formal, surfaced pedestrian route between the site and The Street.

In relation to the definitive alignment of YKEY15, the scheme allows for a 2-metre surfaced footway that runs through the site slightly south of the PRow alignment. To the north of the site, south of Biddestone Lane, the route will be surfaced and 2m wide to enable it to become a 'formal pavement'.

While the suggestion of a new link between YKEY17 and YKEY15 lies outside of the applicant's control and what is necessary to make the development acceptable in planning terms, the applicant is willing to contribute the requested £11,000 towards PRow improvements within the parish along with a contribution to improve YKEY16 enabling resurfacing and lighting to the rest of the route.

Landscape

The Landscape Officer raises a detailed objection, setting out that the site lies within the setting of the Cotswolds National Landscape and away from the settlement edge, in a landscape character area where the strategy is to conserve and strengthen existing rural features. The Officer disagrees with the LVA's central conclusion that the site can absorb the proposed development, considering it instead an isolated extension into open countryside that would erode the village's rural setting, urbanise Biddestone Lane, and undermine the distinctive transition between settlement and countryside.

A major concern raised relates to impacts on PRow YKEY15. The Officer considers that the proposed layout would fundamentally change this to a narrow linear POS enclosed by suburban housing, resulting in a major adverse visual effect that would persist even after 15 years of mitigation. Rooflines would also remain visible in long views from the National Landscape, altering the perception of settlement form. The proposal is also criticised for failing to reflect local vernacular in its materials, boundary treatments, street lighting, layout and SUDs design, with insufficient use of local stone, inappropriate tree species, gaps in landscape mitigation on sensitive boundaries, and an engineered attenuation basin that does not accord with the Design Guide.

The Landscape and Visual Appraisal Addendum confirms that the revised layout and landscape strategy have been strengthened in direct response to the Council's landscape comments. Key amendments include additional boundary planting, particularly along the north-western edge adjacent to the National Landscape, using larger canopy species such as oak and lime to reinforce containment and better integrate the development. Further native shrub and tree planting has been introduced around the SuDS features, including wet woodland clumps and marginal planting, to improve their visual integration. The southern open space has also been enhanced with increased structure planting, and frontage drystone walling has been incorporated along the main spine road to reflect local character as set out in the response to the Urban Design comments below.

In responding to concerns about the visual experience along PRoW YKEY15 and potential perceived "pinch points," the Addendum explains that built form remains set back, with a wide linear greenspace forming the route. Additional planting will soften views, maintain openness, and create an attractive edge as the scheme matures. The Addendum also addresses concerns over potential roofline visibility: existing mature vegetation along Biddestone Lane already provides containment, and the strengthened boundary planting will, over time, further filter views from both the National Landscape and nearby footpaths. The limited hedgerow removal required for the site access (c. 15m) will be offset by reinforced hedgerow planting and new native hedges within the landscape proposals.

We note the concern that the site could be perceived as isolated from the main body of the village due to the presence of the recreation ground between the development and existing built form. However, the recreation ground itself forms an integral part of Yatton Keynell's settlement fabric and is experienced locally as a well-used community space rather than a separation, gap in the village or agricultural land. The site therefore sits immediately alongside an established and active component of the settlement, not beyond it. The proposed development will front towards this area, strengthening natural surveillance, improving connectivity, and reinforcing the role of the recreation ground as a central piece of shared, multifunctional green infrastructure.

In functional terms, the development will be fully integrated with the village through the delivery of surfaced pedestrian routes, including the formalised 2-metre footway along YKEY15 and the connection to YKEY16, which together provide direct, convenient access to the primary school, shop, surgery, village hall and wider services. As a result, the development will operate as a natural extension to the settlement, with clear relationships to the village, rather than as an isolated or detached enclave.

Overall, while the design changes improve integration and mitigate landscape and visual effects, the Addendum concludes that they do not materially change the original LVA judgements.

Urban Design

Concerns were raised regarding character and architectural detailing. Proposed boundary walls and garages are shown in brick, which the Officer states is uncharacteristic of Yatton Keynell, where local stone predominates. The absence of mid-height stone boundary walls, an important and defining local feature, further weakens contextual integration. Several plots were identified with blank or weak side elevations to streets and open spaces, where corner-turning are required to achieve active frontage. Additional connectivity both in terms of vehicular and pedestrian was requested to be reviewed with loops suggested in both.

The revised layout has been carefully considered in light of the Urban Design Officer's comments, and several meaningful amendments have been made to strengthen placemaking, reinforce local character and align the scheme more closely with Building for a Healthy Life principles. The structure of the street network has been improved so that movement is more legible, with private drives visually integrated and pedestrian permeability enhanced through clearer, continuous links, particularly the surfaced connection to YKEY15. The design now ensures that the ends of shared private drives tie into the wider pedestrian network to the north.

In response to comments on boundary treatments and materials, all frontage and garage structures have been amended to use stone rather than brick, reflecting the established village vernacular. Mid-height dry stone walls, which form a defining characteristic of Yatton Keynell and neighbouring schemes such as Drovers Green, have now been incorporated along the principal street to reinforce a coherent, locally distinctive public realm.

Further refinements have been made to house types in order to avoid blank or weakly articulated elevations at key corners and open-space interfaces. The relevant plots have been re-designed to introduce appropriately scaled habitable-room windows on both ground and first floors, ensuring active frontages and improving natural surveillance. Together, these amendments significantly strengthen the character, coherence and legibility of the scheme, ensuring that it accords with Core Policy 57 and delivers the high-quality place-shaping sought by the Council.

Flood Risk and Drainage

Following the detailed comments issued by Wiltshire Council's Drainage Engineer, a meeting was held on 3 September between AtkinsRéalis (LLFA) and the Applicant's drainage consultants to agree a resolution to the comments raised. It was confirmed at that meeting that a revised Flood Risk Assessment and Drainage Strategy would be prepared to address all outstanding technical matters ahead of determination, enabling the use of a single drainage compliance condition in the event that planning permission is granted. The revised documentation provides the requested justification for greenfield runoff parameters, incorporates a full 30% betterment on discharge rates, updates the attenuation design, and includes sensitivity testing for surcharged outfall conditions. Supplementary modelling has also been prepared to demonstrate the capacity and performance of the attenuation basin, flood compensation measures, and exceedance routing across the site.

Further investigations into the downstream ditch connectivity have been completed to confirm the mechanism by which flows continue beyond the site, responding directly to LLFA queries on the suitability of the outfall. Additional blue-green SuDS features and source-control measures have been incorporated where practicable within the revised layout to improve climate resilience and multifunctional placemaking benefits. Collectively, these updates ensure that the drainage strategy now fully responds to the LLFA's technical requirements and delivers a robust, policy-compliant solution capable of being secured via a single pre-commencement condition.

Conclusions

In summary, the revised proposals represent a comprehensive and positive response to the comments received during consultation. The layout, drainage, access arrangements, affordable housing mix, landscape and design details have all been refined to address specific points raised by consultees, and further technical work has been undertaken where requested.

The development will deliver 55 new homes, including 22 much-needed affordable dwellings, together with new public open space, improved pedestrian connectivity and a robust drainage and biodiversity strategy. The scheme is well-related to the services and facilities within Yatton Keynell, and the updated design and landscape proposals ensure that it sits comfortably within its setting while reinforcing local character.

We trust that the information submitted alongside this letter provides the necessary clarity and comfort to enable the application to be positively determined. We would welcome further discussion on any residual points of detail and remain willing to agree appropriate planning conditions and obligations to in due course.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Olly Ansell', written in a cursive style.

OLLY ANSELL
Associate Director

Appendix A – Schedule of Plans and Documents.

The following documents are submitted to support the revised application details,

- Arboricultural Report (dated November 2025), prepared by Silverback Arboricultural Consultancy Ltd;
- Flood Risk Assessment and Drainage Strategy (Revision B) prepared by Phoenix Design;
- Transport Technical Note (dated December 2025) prepared by Pegasus;
- Landscape and Visual Appraisal Addendum (dated November 2025) prepared by FPCR;
- Logic Air. Monobloc Air Source Heat Pump Specification;
- Archaeological Evaluation Report (dated December 2025) prepared by Cotswold Archaeology;
- Sustainability and Energy Statement (dated November 2025) prepared by Building Energy Experts;

The following drawings are submitted to support the revised application details with the superseded plan referenced where applicable,

Proposed Drawing	Superseded reference
Drainage	
Drainage Strategy ref. 617-P-050 Rev B	617-P-050 Rev A
Landscaping	
Detailed Soft Landscape Proposals Sheet 1 of 2 ref. 24_342_101 Rev D	24_342_101 Rev A
Detailed Soft Landscape Proposals Sheet 2 of 2 ref. 24_342_102 Rev D	24_342_102 Rev A
Highways	
Adoptable Highway Plan ref. 617-P-400 Rev B (New drawing)	N/A
Fire Tender ref. 617-P-405-01 Rev B (New drawing)	N/A
Refuse Vehicle ref. 617-P-405-02 Rev B (New drawing)	N/A
Foul Tanker ref. 617-P-405-03 Rev A (New drawing)	N/A
Layout Plans	
110 Rev A Site Location Plan	110
100 Rev A Site Layout B&W	100
101 Rev A Site Layout Coloured	101
102 Rev A Site Layout House Legend	102
103 Rev A Site Layout Boundary Treatments and Hard Surfaces	103
104 Rev A Site Layout Wall Materials	104
105 Rev A Site Layout Roof Materials	105
106 Rev A Site Layout Tenure	106
107 Rev A Site Layout Ownership	107
108 Rev A Site Layout Services	108
109 Site Layout Bicycle Provision (New drawing)	N/A

Suites 9 & 10
Bristol North Baths
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Sketch Layout Colour (New drawing)	N/A
Sketch Layout Colour with Background (New drawing)	N/A
House Types	
012 Rev A Type D floor plans	012
014 Rev A Type D Elevations	014
023 Rev A Type F Floor Plans	023
024 Rev A Type F+ Floor Plans	024
029 Rev A Type M+ Floor Plans	029
037 Rev A Type P+ Elevations Option 2	037
041 Rev A Type K and KV1 Floor Plans	041
042 Rev A Type K and KV1 Elevations	042
043 Type Ashley Floor Plans	043
044 Type Ashley Elevations	044
060 Rev A Type A2 – Semi – Floor Plans	060
061 Rev A Type A2 – Semi – Elevations	061
063 Rev A Type A2 Terrace Floor Plans	063
064 Rev A Type A2 Terrace Elevations	064
068 Rev A Type A3 Terrace Floor Plans	068
069 Rev A Type A3 Terrace Elevations	069
072 Type A3 Terrace Floor Plan	072
073 Type A3 Terrace Elevations	073
074 Type A2 Terrace x 3 Floor Plans	074
075 Type A2 Terrace x 3 Elevations	075
083 Quad Garage (New drawing)	
Withdrawn Plans	
013 D+ Floor Plans	
016 D+ Elevations	
028 Type M Floor Plans	
030 Type M Elevations – Option 2	