

Planning Statement

Including
Affordable Housing Statement

Land lying to the west of Semington Turnpike, Semington

December 2025

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1.0 Introduction

1.1 Hollins Strategic Land (herein referred to as “HSL” or “The Applicant”) is seeking outline planning permission for up to 48 dwellings and a village shop (all matters reserved other than access) at land Turnpike Close, Semington.

1.2 The proposed description of development is:

Outline planning application for up to 48 dwellings, a village shop (use class F2(a)) and associated green infrastructure (all matters reserved other than access).

1.3 This Planning Statement sets out:

- A description of the site and surroundings;
- The scope of the development proposal;
- The statutory and planning policy context of the site and application proposals; and
- Assessment of the proposals against the statutory and planning policy context and other material considerations and technical matters relevant to the site proposal.

1.4 This Statement will provide an overview of the site and the proposed development, the proposals’ compliance with the adopted Development Plan for Wiltshire Council (WC) and other material considerations.

1.5 Submitted with this Planning Statement are the following:

- Planning Application Forms and Certificate - via the Planning Portal ref PP-14496635.
- Site Location Plan
- Access Plan – Ref 4234-F01 rev B
- Parameter Plan – Ref 2483-URB-XX-XX-DR-UD-9002
- Illustrative Master Plan – Ref - 2483-URB-XX-XX-SK-UD-9001 Rev 05
- Topographical Survey – Ref - S18-1093 prepared by JLP
- Geophysical Survey Report - SUMO-22742 (August 2025) – Sumo Geo Surveys
- S106 Proforma
- Waste Audit Statement
- Drainage Management Strategy - HYD1097_TURNPIKE.CLOSE_DMS (November 2025) -Betts Hydro Consulting Engineers
- Flood Risk Assessment – HYD1097_TURNPIKE.CLOSE_FRA (November 2025) – Betts Hydro Consulting Engineers.
- Phase I Geo-Environmental Assessment Report – AF/C6161/14230 (June 2025) – Brownfield Solutions Ltd.

- Transport Statement (November 2025) – Eddisons
- Noise Impact Assessment - 25.203.1.R2 (November 2025) – Professional Consult Limited
- Arboricultural Report - AWA6865 (November 2025) – AWA Tree Consultants
- Utilities Search Report (May 2025) – Brownfield Solutions Ltd
- Preliminary Ecological Appraisal (June 2025) prepared by Collington Winter
- Biodiversity Net Gain Assessment (November 2025) prepared by Collington Winter
- Statutory Biodiversity Metric (November 2025) prepared by Collington Winter.

2.0 The Site & Surroundings

- 2.1 The application site is 2.6ha and comprises of land lying west of Semington Turnpike. The land is vacant and has previously been used for livestock sales. The land is generally flat.
- 2.2 The site is bound to the north and east by residential development at Kendall Lane, existing properties at St Georges Place and properties located off Turnpike Close, with employment and industrial units located beyond. To the south is an existing tree belt, hedgerow and the A361. To the west, the site is bound by tree and hedgerow cover.
- 2.3 The site is accessed via the southern boundary from the A361 and from Turnpike Close.
- 2.4 The site is known locally as the 'Auction Field', which relates to the site being previously used as an auction site for the sale of livestock.
- 2.5 The site is within walking/cycling distance of a number of services and facilities. Bus services run along through Semington with stops in close proximity to the site. More information is available in the submitted Transport Statement.

Planning History

- 2.6 A review of the Wiltshire Council planning search facility reveals that there are a number of historic planning applications concerning the site itself, though none are directly relevant to the application proposals. These include the following
 - *Application ref: W/75/01115/HIS, approved February 1976; Continuation of use of Portable Timber Hut used in connection with Implement sale on 5 occasions each year.*
 - *Application ref: W/77/01058/HIS, approved January 1978; Continuation of use of portable timber hut used in connection with implement sales on 5 occasions in each year.*
 - *Application ref: W/80/01472/HIS, approved January 1981; continuation of use of portable timber huts used in connection with Implement Sales.*
 - *Application ref: W/82/00502/HIS, withdrawn July 1982; Permanent sale field with enhanced facilities.*
 - *Full planning application ref: W/83/01351/FUL, approved December 1983; Continuation of use of portable timber huts used in connection with implement sales (renewal).*
 - *Full planning application ref: W/90/00012/FUL, approved February 1990; Use of timber hut used in connection with implement sales*

3.0 The Proposed Development

- 3.1 The proposed description of development is as follows:

'Outline planning application for up to for up to 48 dwellings, a village shop (use class F2(a)) and associated green infrastructure (all matters reserved other than access).'

- 3.2 The submitted Illustrative Masterplan demonstrates how the site could deliver a residential development of up to 48No. dwellings and a village shop in accordance with the policy objectives of the SNP.

Market and Affordable Housing

- 3.3 There will be a mix of house types, including detached, semi-detached, cottage terraced housing and live above the shop type apartments. The proposals will deliver 30% affordable housing, in accordance with the policy requirement. The tenure split is to be agreed with the LPA.

Village Shop (use class F2(a))

- 3.4 The village shop will cover an area of up to 280m². The illustrative Village Shop Concept Plans and Elevations are shown in the DAS and demonstrate that a suitably designed ground floor shop could be delivered, with apartments on the upper floor.

Green Infrastructure

- 3.5 The proposals retain the established site boundaries and aims to create on site biodiversity enhancements as well as central open provision.

4.0 Planning Policy Context

- 4.0 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that *‘regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise’*.
- 4.1 Therefore, the starting point for the consideration of any planning application is the Development Plan. It is also relevant that material considerations will include national policy as set out in the National Planning Policy Framework (NPPF) (2024) and the National Planning Practice Guidance (NPPG).

National Planning Policy Framework (NPPF) (2024):

- 4.2 The NPPF sets out the Government’s planning policies for England and how these should be applied. It establishes sustainable development having three overarching objectives which are economic, social and environment objectives (para. 8). It confirms these objectives are interdependent and need to be pursued in mutually supportive ways. In respect of the social role, the aim is to support and enhance communities through the provision of a sufficient number and range of homes for the future, whilst creating well designed/attractive places, which have strong amenity provision to benefit community wellbeing.
- 4.3 Paragraph 11 of the NPPF confirms *“Plans and decisions should apply a presumption in favour of sustainable development”*. For decision-taking, this includes:
- c) approving development proposals in accordance with an up-to-date development plan without delay; or*
 - d) 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 strong 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, 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*
- 4.5 Paragraph 39 of the NPPF states that:

Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

The Development Plan

4.6 In accordance with Section 70(2) of the 1990 Act and Section 38(6) of the 2004 Act, the statutory development plan for the site comprises the:

- Wiltshire Core Strategy (adopted January 2015) (WCS), which predates the issue of the current NPPF;
- Saved policies for the West Wiltshire District Local Plan; and,
- Semington Neighbourhood Plan (adopted March 2025) (SNP) forms part of the development plan and its policies should therefore be given appropriate weight.

Wiltshire Core Strategy (adopted January 2015) (WCS)

4.7 The following WCS policies are relevant to the application proposals:

- CP1: Settlement Strategy;
- CP2: Delivery Strategy;
- CP3: Infrastructure requirements;
- CP15: Spatial Strategy: Melksham Community Area;
- CP41: Sustainable construction and low-carbon energy;
- CP43: Providing affordable homes;
- CP45: Meeting Wiltshire's housing needs;
- CP46: Meeting the needs of Wiltshire's vulnerable and older people;
- CP50: Biodiversity and Geodiversity;
- CP51: Landscape;
- CP52: Green Infrastructure;
- CP57: Ensuring high quality design and place shaping;
- CP58: Ensuring conservation of the historic environment;
- CP60: Sustainable transport;
- CP61: Transport and new development;
- CP62: Development impacts on the transport network;
- CP64: Demand management;
- CP67: Flood risk; and,
- CP68: Water resources.

West Wiltshire District Local Plan

4.8 The following WWDLP policies are relevant to the application proposals:

- U1a: Foul water disposal;
- U2: Surface water disposal;

- U4: Ground source protection areas; and,
- I1: Implementation.

Semington Neighbourhood Plan (adopted March 2025) (SNP)

4.9 The following SNP policies are relevant to the application proposals:

- Policy SEM 3: Communications Infrastructure;
- Policy SEM 5: Public Rights of Way and Cycle Network;
- Policy SEM 6: Green Blue Infrastructure and Nature Recovery;
- Policy SEM 8: Design and Local Distinctiveness;
- Policy SEM 9: Pre-application Community Engagement;
- Policy SEM 10: Land to the west of Turnpike Close (the Auction Field);
- Policy SEM 11: Community Facilities; and,
- Policy SEM 12: Sustainable construction.

Emerging Development Plan

4.10 The Examination of the emerging Local Plan Review (eLPR) has been paused. The Hearing sessions began on 11 November 2025, but the examining Inspectors quickly decided that significant further work was required. At the time of writing this Statement, it is not known when the work will be undertaken by or when the Hearing sessions will resume. The eLPR must be given limited weight in the decision-making process.

Other Local Documents

- 4.11 **Strategic Housing and Economic Land Availability Assessment** (July 2017) - The site (reference: 724) was identified as being suitable and achievable for residential development, whilst also being available. It was identified as having a capacity of 100 units and being developable in the short term.
- 4.12 **Housing Land Supply Statement** (June 2025) - The latest HLSS has a base date of April 2024 and states that the Council has a deliverable housing supply of 2.4 years.
- 4.13 **Green and Blue Infrastructure Strategy for Wiltshire** (February 2022) - This Strategy aims to embed green and blue infrastructure into development and place-making. The Council recognises the importance of Green and Blue Infrastructure (GBI) as they support access to nature and healthy lifestyles, and provide high quality landscapes and beautiful places for people to live, work and visit.
- 4.14 **Wiltshire Design Guide** (2024) - The primary aim of this SPD is to elaborate on Core Strategy policy 57, which requires a high standard of design in all new developments. The Vision for the SPD states “appreciating context and focusing on what is important for shaping the future should give a clear direction to designs coming forward in Wiltshire, allowing them to make a positive contribution to its character”.
- 4.15 **Briefing Note No. 24-20** (17 December 2024) sets out that WC cannot demonstrate the required five year housing land supply and states the following with regard the implications for decision-taking:

Prior to the publication of the revised NPPF the council was already in a position where it was unable to demonstrate the requisite housing land supply (see member Briefing note 24-18) and the 'tilted balance' was applied. The same implications for determining planning applications therefore continue to apply, however with other particular factors to consider because of changes to the NPPF. Firstly, the magnitude of the shortfall in supply is now substantial and the weight to be given to improving housing supply greater compared to when the council had a more marginal supply. However, and following on from this, the presumption in favour of sustainable development now requires decision-takers to have particular regard to key policies as set out in footnote 9 of the NPPF (highlighted in paragraph 3.d above) to ensure that proposals that can help improve housing land supply are properly and thoroughly assessed against the key policies.

The Government's response to the NPPF consultation growth agenda reiterates its Plan for Change. This sets out a commitment to rebuilding Britain, delivering 1.5m new homes along with the critical infrastructure that underpins economic growth. It further sets out that this will be achieved in part by reforming the planning system, and radically boosting the supply of housing, while delivering homes and places that are high-quality and genuinely affordable. The approach to applying the presumption in favour of sustainable development should be seen with this national objective in mind.

Other Relevant Documents:

- 4.16 **The Government's Plan for Change** is referred to in BN 24-20, which confirms that it "sets out a commitment to rebuilding Britain, delivering 1.5m new homes along with the critical infrastructure that underpins economic growth. It further sets out that this will be achieved in part by reforming the planning system, and radically boosting the supply of housing, while delivering homes and places that are high-quality and genuinely affordable" (BN, para. 7). The BN then states that "the approach to applying the presumption in favour of sustainable development should be seen with this national objective in mind" (para. 7).
- 4.17 **Written Ministerial Statement** (December 2024), 'Building the Homes we need' was made on 12.12.2024, alongside the 2024 NPPF. It starts by stating that the Government "has inherited an acute and entrenched housing crisis" and continues to set out how the Government will tackle the housing crisis "because the alternative is a future in which a decent, safe, secure and affordable home is a privilege enjoyed only by some rather than being the right of all working people".
- 4.18 The WMS sets out why it is raising housing targets and confirms that the revised SM "will have the effect of altering the distribution, increasing numbers in those places facing the most acute affordability pressures while maintaining ambitious targets across the whole of the country".
- 4.19 The WMS stresses the importance of the plan-led system but also states:

Rapidly driving up planning consents in the context of a system with woefully inadequate local plan coverage will increase the number of permissions secured outside of local plan allocations in the short-term. This is necessary if we are to see the scale of delivery we need to meet our commitment to 1.5 million homes. Therefore, where it applies, the presumption in favour of sustainable development must have real teeth. The changes we make today ensure that the presumption carries real weight, acting as a significant adjustment to the decision-making balance in favour of approving development.

5.0 Technical Considerations

Flood Risk Assessment and Drainage Management Strategy

- 5.1 A Flood Risk Assessment (FRA) and Drainage Management Strategy (DMS) has been prepared by Betts Hydro Consulting Engineers to support the planning application. The proposals are at a 'low' flood risk.
- 5.2 The FRA confirms that the site lies within Flood Zone 1, giving the site the lowest risk of river and sea flooding. Consultation held with the Environment Agency, Wessex Water and Wiltshire Council has identified no previous instances of flooding within or near the site.
- 5.3 There are some surface water areas identified on site. These areas correspond with existing low points and ponding of water. Mitigation techniques are suggested including the use of elevated finished floor levels to create safe overland flow routes in the event of any surface water and groundwater flooding.
- 5.4 The Drainage Management Strategy provided has reviewed three methods for the management and discharge of surface water including discharge via infiltration, discharge to watercourse; and discharge to public sewer. Given the sites flat topography and the absence of natural drainage features, it is understood that the site currently drains into the ground over an extended period. This combined with surrounding developments suitable infiltration rates, has guided an infiltration led approach to the discharge of surface water.
- 5.5 The Drainage Management Strategy proposes a combination of infiltration-based features be utilised. These are to be provided to BRE365 standards in accordance with the CIRIA SuDS Manual.
- 5.6 The surface water drainage system for the site will be designed to allow for the 1 in 100yr storm events, with 45% allowance for Climate Change. Specific discharge rates are to be confirmed following onsite infiltration testing.
- 5.7 With regards to the discharge of foul water generated by the proposal, it is proposed that the site will connect to the public foul water sewer network within Turnpike Close.
- 5.8 The FRA and DMS have considered the relevant matters and confirm that the development of the site can be appropriately designed and managed to not result in flood risk in line with policy CP67 of the WCS and climate change and flooding policies of the NPPF and can utilize and build upon the existing drainage regime in the area for an efficient use of infrastructure.

Trees

- 5.9 The tree survey concludes that there are 21 individual trees and 11 tree groups situated on the site boundary.
- 5.10 There is no Cat A trees. The majority of tree and groups retention are Cat 'C'. All established trees and groups are proposed for retention.

Ecology and Biodiversity Net Gain

- 5.11 The Preliminary Ecological Assessment (PEA) describes the site as a grassland field bound by hedgerows and broadleaved trees. It sets out enhancement recommendations for the site such as bat/bird boxes, planting of linear features and the inclusion of hedgehog highways.
- 5.12 The BNG Assessment sets out the baseline position. Based on the most recent surveys, it is likely that some off site credits or habitat bank units will be required to ensure a 10% net gain is achieved.

Ground Conditions

- 5.13 Brownfield Solutions have produced a Phase 1 Geo-Environmental Desk Study Report (AF/C6161/14230) in light of the above.
- 5.14 The overall risk to health from on-site soil contamination is moderate/low to low, whilst the risk from off-site sources of contamination is considered to be very low. It is also noted that risk from permanent ground gases is moderate/low and radon is not considered to pose a risk. The overall risk to controlled waters is low.
- 5.15 Intrusive investigations at detailed design stage will confirm the most suitable foundation solution and to obtain parameters for concrete classification, floor slab and highways design. Infiltration is potentially viable.
- 5.16 In light of the above, the proposals are compliant with Policies CP67 and CP68 of the WCS.

Archaeology

- 5.17 Sumo Geo Surveys have produced a Geophysical Survey Report in support of the application. The report states that “No magnetic responses have been recorded that could be interpreted as being of definite archaeological interest” and as such it is not considered necessary to conduct further archaeological investigations.

Noise

- 5.18 A Noise Impact Assessment has been produced by ‘Professional Consult’.
- 5.19 In summary, the report concludes that the proposed development will meet acceptable noise levels in both internal and external amenity areas.

Transport

- 5.20 Eddisons have prepared a Transport Statement (TS) to support the planning application. In summary, the TS concludes that:
- the proposed development accords with relevant national and local policy aims with regards to transport and highways matters.
 - the site is accessible by a multitude of sustainable transport modes. This includes walking, cycling and public transport, affording alternatives to car travel. Bus stops are close by, enabling opportunity for access by bus to larger surrounding settlements.
- 5.21 The access road for the site will be taken from a new priority-controlled T-junction located at Turnpike Close. This access will achieve visibility splays in line with Manual for Streets guidance. This access road will also include traffic calming measures and turning heads alongside associated cul-de-sacs. As such, the site will be accessed by safe and efficient vehicular access arrangements.
- 5.22 Refuse collection vehicle and a fire tender are able to safely access and manoeuvre throughout the site as evidenced within the swept path analysis. Car parking is to be provided to adoptable standards.

- 5.23 The application is supported by a site access drawing with visibility splays.
- 5.24 The proposed development would have a negligible impact on the local highway network and will not result in a 'unacceptable' or 'severe' impact on the operation of the highway network or highway safety.
- 5.25 The scheme accords with WCS policy CP60, CP61 and CP62.

6.0 Housing Land Supply

Deliverable housing land supply

- 6.1 Para. 78 of the NPPF confirms that WC should identify a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set by their local housing need, given their strategic policies are more than five years old. It also requires a buffer of 5% to ensure choice and competition in the market for land.
- 6.2 The current LHN figure is 3,492 dwellings per annum (dpa), which equates to 17,460 homes over a 5 year period and 18,333 with a 5% buffer. WC has recently published a Housing Land Supply Statement (HLSS) 2025, with a base date of April 2024, using the previous LHN figure of 3,525 dpa. WC has confirmed that it can only demonstrate a 2.42 years supply of deliverable housing land.

Area	Annual Local Housing Need (LHN)	5-year housing requirement	5-year housing requirement plus buffer*	Deliverable supply 2024-2029	Number of years deliverable supply
Wiltshire	3,525	17,625	18,506	8,945	2.42

Figure 1: Table 2a of HLSS 2025

- 6.3 This equates to a shortfall of 9,561 homes. This represents a serious and substantial shortfall, as acknowledged in Briefing Note no. 24-20 (see para. 14).
- 6.4 WC acknowledges that *“it is imperative that the housing land supply is continually replenished with new planning permissions and site allocations to ensure that housing requirements in the future can be met”* (Briefing Note 25-04). There is a critical need to allow suitable sites, such as the application site which is a Neighbourhood Plan allocation, to come forward now to meet WCs shortfall.

7.0 Planning Considerations

- 7.1 This section assesses whether the proposal complies with the development plan as a whole and addresses other material considerations.

Compliance with the Development Plan

- 7.2 Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of applications/appeals must be made in accordance with the development plan unless material considerations indicate otherwise.
- 7.3 As set out in Section 4 of this Statement, the development plan comprises of the Wiltshire Core Strategy (WCS), saved policies for the West Wiltshire District Local Plan (WWDLP) and the Semington Neighbourhood Plan (SNP). The development plan policies relevant to the principle of the proposed development are CP1, CP2 and CP15 of the WCS and SEM10 of the SNP. The proposals are assessed against these most important policies in turn below.
- 7.4 However, it should first be noted that, in accordance with para. 11 of the NPPF, the most important policies for the determination of this application are out-of-date and this includes CP1, CP2, CP15. This is because the Council can only demonstrate a deliverable housing land supply of 2.42 years which represents a significant and serious shortfall.

WCS Policy CP1

- 7.5 CP1 sets out the Settlement Strategy in line with a hierarchy: Principal Settlements, Market Towns, Local Service Centres, Large and Small Villages. Semington is identified as a Large Village. The policy states the following about Large Villages:

Large Villages are defined as settlements with a limited range of employment, services and facilities.

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.

- 7.6 The application site is allocated for residential development and a village shop under policy SEM 10 of the SNP. Policy SEM 10 confirms that the housing element should meet local needs, as required by WCS policy CP1. The housing mix will be secured at Reserved Matters (RM) stage, but the LPA can secure a scheme that meets local needs by imposing a condition.
- 7.7 Policy SEM 10 also requires the site to provide a village shop. The policy justification sets out that the closure of the previous shop and post office “*was regretted almost immediately*” (SNP, para. 6.47). The community identified an opportunity to secure a village shop via the SNP which, as required by WCS policy CP1, would improve local facilities.
- 7.8 The application proposals evidently comply with WCS policy CP1.

WCS Policy CP2

- 7.9 CP2 does not permit development outside the defined limits of development, set out in the policies map, except in defined circumstances. The application site was not within the defined limit of development, as originally set by the WCS policies map. However, as allowed by policy

CP2, the limit of development has been altered through the identification of the site for development through the SNP.

- 7.10 Policy CP2 confirms that, within the defined limits of development of Large Villages, there is a presumption in favour of sustainable development.

- 7.11 The proposals represent sustainable development and therefore comply with WCS policy CP2.

WCS Policy CP15

- 7.12 CP15 sets out the spatial strategy for the Melksham Community Area (MCA). It provides an indicative number of new homes but does not set a ceiling figure. Growth in the MCA over the plan period may consist of a range of sites in accordance with CP1 and CP2.

- 7.13 As stated above, the proposals comply with policies CP1 and CP2 and as such, the proposals also comply with CP15.

SNP Policy SEM 10

- 7.14 The SNP reflects the views of the local community. It is “*based on robust information and analysis of the local area*” (SNP, para. 1.16). Hollins Strategic Land LLP has proactively engaged with the Neighbourhood Plan Steering Group (NPSG) and Parish Council (PC). This process resulted in the application site being allocated for residential development and a village shop, under policy SEM10. The policy has 4 limbs, which are considered in turn below. It is demonstrated that the proposals comply with SEM 10.

1: The site is allocated for the development of approximately 40 dwellings and a village shop (use class F2(a))

- 7.15 The application proposals accord with this limb. The proposals are for up to 48No. dwellings, an amount that has been agreed with the NPSG and PC through the Community Engagement Process (CEP) that preceded the submission of this application. As set out by the NPSG in the appended Statement of Community Involvement (SoCI):

Policy 10 of the NP allocates the Auction Filed for “approximately 40” homes. The design and layout which HSL presented at this consultation event was for 48 homes. HSL was keen to point out that the density of build and housing footprint was broadly contained within the original HSL plan for 40 homes on the site. This had been achieved by a variety of small changes, such as two semi-detached buildings (so 4 properties) becoming two 3 home terraces (so 6 properties).

By and large, villagers didn’t seem too agitated by the increase in numbers, though they were against any more.

- 7.16 The proposals are also for a village shop (use class F2(a)).

2a: The housing proposal should meet local needs

- 7.17 The policy requires that the residential element of the scheme meets local needs, as identified in the Semington Parish Housing Needs Survey (2021), the Swindon and Wiltshire SHMA 2017, and any subsequent updates. The Applicant would welcome discussions with the LPA during the application process with regard housing mix.

- 7.18 However, it is to be noted that an indicative housing mix was consulted upon as part of the CEP and was well received. The consultation event demonstrated how the development could accommodate a housing mix comprising of 1/2 bedroomed apartments above the shop, 2/3

bedroomed terraced cottages, 3-bedroomed semi-detached and 4-bedroomed detached homes, while incorporating 30% affordable homes comprising of affordable rent and discounted market sale homes. As confirmed in the Report by the NPSG, *“the mix of homes also seems to have village support, with varying degrees of enthusiasm for homes for older people, first-time buyers, younger people and people with mobility issues”*.

- 7.19 Part 2a of the policy requires that the site delivers at least 30% affordable housing in line with the current WCS policy requirement (or higher in line with the emerging Wiltshire Local Plan Review). As confirmed, the eLPR can only be afforded limited weight in the decision-making process given its stage of preparation. The proposals will deliver 30% affordable housing and the tenure mix can be agreed with the LPA during the application process.

2b: The housing proposal should include a site-specific flood risk assessment and all development will need to pass the sequential test from all sources of flooding.

- 7.20 A Flood Risk Assessment (FRA) has been submitted with the application. It confirms that the site lies within Flood Zone 1, giving the site the lowest risk of river and sea flooding. Further consultation held with the Environment Agency, Wessex Water and WC has identified no previous instances of flooding within or near the site. Although the FRA demonstrates that there is a Main River 710m north-west and an Ordinary Watercourse located 570m to the south-east, the fluvial flood risk from these rivers is ‘low’ based on the surrounding topography and distance from the site.

- 7.21 The FRA confirms that, based on long-term flood risk mapping, small areas towards the southern boundary and to the north-west are shown to be within areas with medium and high chance of surface water flooding. These areas correspond with existing low points and ponding. As such, mitigation is proposed, including setting finished floor at appropriate levels and designing safe overland flow routes to meet post development scenarios.,.

- 7.22 The SNP was Made prior to the September 2025 update to the National Planning Practice Guidance (NPPG). The NPPG states the following:

Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied. (Para. 027 Reference ID: 7-027-20220825)

- 7.23 This confirms that a Sequential Test is not required for this application.

2c: The housing proposal should meet the requirements of the Semington Character Statement and reflect the existing low-medium density character of the wider area.

- 7.24 The submitted Design and Access Statement (DAS) demonstrates compliance with this element of policy SEM10. Again, this matter was discussed during the CEP and was well received.

2d: The housing proposals should not be occupied until the village shop is constructed and capable of occupation for its intended use (secured by planning condition).

- 7.25 The location and indicative design of the village shop were discussed during the CEP and were well received. The NPSG, PC and local community are keen for the shop to be located in the southeastern corner of the site, as shown on the indicative layout. As set out by the NPSG I the SoCI, *“those attending gave wholehearted support to a commercial shop”* and *“the location was ... strongly supported”* because it would attract passing A361 trade, assisting viability.

- 7.26 The Applicant will agree the wording of the condition with the LPA during the application process.

3: The development proposal will be expected to be informed by robust and meaningful community engagement, in accordance with the Semington Pre-application Engagement Protocol.

- 7.27 As referenced above, the Applicant has undertaken the CEP and each stage of the process was agreed with the NPSG and PC. Following the making of the SNP, the applicant met with NPSG/PC virtually and in person at the Village Hall to discuss initial concepts for the site and to agree upon the extent of community engagement. A Consultation Event facilitated by the PC and led by Hollins Strategic Land LLP was then held on Saturday 13th September 2025 from 10.30am to 3pm. This provided an opportunity for the community to meet the PC and HSL to discuss the application proposals. [appendix consultation slides]

- 7.28 As set out in the SoCI, the material for the event was supplied by HSL¹, in the form of information boards covering topics such as planning context, design parameters, illustrative site plans, housing style and local shop plan. The content had been agreed with the NPSG.

- 7.29 35 people attended the event, some staying for over half an hour to raise questions, discuss issues and write comments (22 feedback forms were returned, plus 16 post-its left on the day). The PC also published the material online and allowed further consultation responses to be submitted. The written information was analysed and the NPSG report that forms part of the SoCI summarises the main points.

- 7.30 If requested, the NPSG/PC will undoubtedly confirm that the development proposals have been informed by robust and meaningful engagement, in compliance with SEM 10.

3a: The development should include high quality open space, including recreation areas.

- 7.31 As demonstrated on the submitted Parameters Plan, Illustrative Masterplan and within the DAS, the development will include green infrastructure provision including a Local Area for Play (LAP). It is anticipated that the LPA will secure the delivery of the open space by approving the Parameters Plan. The s106 Agreement will secure the management and maintenance of the open space in perpetuity.

3b: The development should include the retention of trees and hedgerows with the provision of new areas landscaping

- 7.32 As confirmed in the submitted Arboricultural Report and DAS, the proposals have been designed to ensure the retention of trees and hedgerows. Furthermore, the DAS demonstrates how the site could be suitably landscaped through tree lined streets, planting within POS areas and the strengthening of existing vegetated boundaries.

3c: The development should include pedestrian and cycle linkages through the site particularly linking into the existing PROW network and to facilitate access to key facilities in the village (including the shop) via the east and northern site boundaries

- 7.33 As shown in the DAS, Parameter Plan and Illustrative Layout, the proposals accord with this requirement of SEM 10. The site will be accessed via Turnpike Close, with footways linking to existing provision.

- 7.34 The proposals can facilitate a potential link to the northern boundary. Following the CEP, it is envisaged that an A-frame barrier will be erected at the northern site boundary to deter any potential connection being used by motorcycles; a number of people asked if this would be

¹ Consultation Event Material to be found within SoCI

possible during the Consultation Event and the applicant would be happy for a condition to be imposed requiring such a deterrent to be erected within the site boundary.

3d: The development should include safe access, including vehicular access, which should not be directly from the A361 and the provision of sufficient car and cycle parking

- 7.35 As confirmed in the submitted Transport Statement, the development can be accessed via Turnpike Close in a safe and sustainable manner. The amount of parking is of course for consideration at RM stage, but the illustrative layout demonstrates how appropriate parking for the dwellings and shop could be delivered.

3e: The site lies within the height and bird strike safeguarding zone of RAF Keevil and the development should not impact on the operation and capability of that military airfield.

- 7.36 Compliance with this requirement will be confirmed via consultation as part of the application process.

4: In line with SEM12, a Sustainable Energy Statement should be submitted to demonstrate the measures to adapt to climate change impacts.

- 7.37 This requirement is one that will need to be addressed at RM stage and the LPA can impose a condition on the outline permission requiring the submission of a Sustainable Energy Statement with the RM application.

Summary

- 7.38 The application site is allocated for the proposed development in the SNP. The development plan policies relevant to the principle of the proposed development are CP1, CP2 and CP15 of the WCS and SEM10 of the SNP. It has been demonstrated that the proposals are compliant with each of these policies. The Technical Reports, summarised in Section 6 of this Statement, demonstrate that the proposals would comply with wider relevant policies.
- 7.39 The application proposals are in accordance with the development plan and should be approved without delay.

Material Considerations

- 7.40 As stated, the policies which are most important for determining the application are out-of-date. In such circumstances, para. 11 of the NPPF states that permission should be granted unless:
- i. The application policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. Any adverse impacts of doing so would significant 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*
- 7.41 There are no relevant areas or assets of particular importance that would provide a strong reason for refusing the development proposed. The site is allocated and the proposals comply with the development plan. As such, there are no adverse impacts to significantly and demonstrably outweigh the benefits, which are numerous and substantial in weight.

Benefits of the proposed development

- 7.42 The proposed development would provide the following social, economic and environmental benefits:

Social Benefits

- A. Provision of a Village Shop.
- B. Contribution of (up to) 48 deliverable homes to boost supply.
- C. Contribution of (up to) 14 affordable homes to meet an acknowledged shortfall.
- D. Provision of high quality public open space, accessible to existing residents and managed in perpetuity, responding to an acknowledged shortfall.

Economic Benefits

- E. Provide employment opportunities for the construction industry and benefit the wider construction industry supply chain.
- F. Result in spending in nearby local shops and businesses.
- G. Employment creation via the village shop.

Environmental Benefits

- H. Biodiversity enhancement.
- I. Facilitating energy efficient homes.
- J. Ecological design enhancements such as bat / bird boxes.
- K. Delivery of locationally sustainable development and enhanced sustainability for Semington.

- 7.43 These benefits are assessed in turn below. The following hierarchy of weight is used.

Positive weight	Negative weight
Substantial	Substantial
Significant	Significant
Moderate	Moderate
Limited	Limited
None	None

Social benefits

A: Provision of a Village Shop

- 7.44 As stated, the SNP confirms that the closure of the previous shop and post office “*was regretted almost immediately and there have been persistent calls from villagers since then for a replacement*” (SNP, para. 6.47). The SNP continues to stress how villagers commented on the need for more facilities in Semington during the SNP process and provides the following example comment:

I'd like to see more socially-centred places. A village shop to encourage walking and social interactions

- 7.45 Additionally, as stated within the SoCI, the members of the community that attended the Consultation Event “gave wholehearted support to a commercial shop”.
- 7.46 The reintroduction of a shop for Semington residents is undoubtedly of social value to the community.

Benefit	Positive weight
Provision of a village shop	Significant

B: Contribution of (up to) 48 deliverable homes to boost supply

- 7.47 It is evident that WC has failed to provide the required amount of housing and will continue to do so for some time:
- The current deliverable housing land supply is only 2.42 years, which can be described as woeful, and represents a serious and substantial shortfall, as acknowledged by WC in BN No. 24-20.
 - This supply equates to a shortfall of 9,561 homes;
 - There has been a persistent shortfall of deliverable housing land since April 2019, with the supply worsening year on year from 2021.
 - The WCS was supposed to deliver at least 42,000 homes between 2006 and 2026, but there will be a shortfall of 1,031 dwellings against that minimum requirement which is of course significantly below an up to date needs assessment based on the revised SM.
 - The housing requirement set out in the eLPR will only meet 59% of the revised LHN.
 - WC has accepted that it will have to begin work on a new LP immediately after the eLPR is adopted and it is possible that the new LP will not be adopted for a number of years.
 - A 20% buffer will need to be applied to the 5-year assessment from July 2026.
- 7.48 It is evident that the current development plan is failing to provide the required amount of housing and is not significantly boosting housing. BN 24-20 acknowledges that the “*magnitude of the shortfall is now substantial and the weight to be given to improving housing supply greater compared to when the council had a more marginal supply*” (para. 6).
- 7.49 The weight to be afforded to the provision of (up to) 48 dwellings, on a site which is allocated for housing in the SNP, is therefore substantial.

Benefit	Positive weight
Contribution of up to 48 deliverable homes to boost supply.	Substantial

C: Contribution of (up to) 14 deliverable homes to boost supply

- 7.50 The NPPF states that “the overall aim should be to meet as much of an area’s identified housing need as possible” and it continues to state “including with an appropriate mix of housing types for the local community” (para. 60). The eLPR recognises that “appropriate tenure and affordability are key to meeting housing needs and to developing mixed, balanced and inclusive communities” (para. 5.55).
- 7.51 Additionally, it is worth referring again to the significantly increased housing requirement at this stage. As stated, the WMS sets out why the Government is raising housing targets and confirms that the revised SM “will have the effect of altering the distribution, increasing numbers in those places facing the most acute affordability pressures”. The woeful deliverable land supply will of course impact on affordable housing delivery.
- 7.52 In the decision on appeal 3321957 (dated 20/03/2024), the Inspector stated that “there has also been a persistent shortfall of affordable housing delivery in the area and the Council’s Housing Waiting List has grown by 158% since 2015” (para. 108). The Inspector referenced the Appellant’s Proof of Evidence, which is extracted below:

- 5.22. The Council publish only limited information on affordable housing need and delivery across the authority area. However, in response to a Freedom of Information request related to an appeal at Land West of Semington Road the Council provided the appellant with data on the net affordable housing delivery and how this compares with the WCS Policy CP43 requirement for 650 additional affordable dwellings per annum. For the period since the WCS was adopted in 2015 the figures demonstrate that a shortfall of 22% against the target has accrued:

Figure 4: Net Affordable Housing Completions in Wiltshire Compared with WCS Requirement

Year	Net Affordable Housing Delivery	Net Affordable Housing Target	Numerical Shortfall	Shortfall as a % of Identified Needs
2015/16	366	650	-284	-44%
2016/17	361	650	-289	-44%
2017/18	528	650	-122	-19%
2018/19	689	650	39	+6%
2019/20	577	650	-73	-11%
2020/21	539	650	-111	-17%
Totals	3,060	3,900	-840	-22%

- 5.23. The under-delivery of affordable homes has resulted in fewer properties being available to those in the greatest need; a factor which will inevitably have contributed to the Council’s Housing Waiting List having grown by over 158% since the adoption of the WCS in 2015, from 1,853 households in 2015/16 to 4,785 households in 2021/22²⁷. There is a chronic need for additional affordable housing and that need has grown rapidly over the past seven years since the WCS was adopted.

Figure 2: Extract from Appellant’s Planning Proof of Evidence for appeal 3321957

- 7.53 The Inspector described this as a “pressing context” (see para. 108) when deciding that the 30% affordable housing provision would be very significant.
- 7.54 The Storridge Road appeal decision (dated 30/08/24) (ref: 3340811) confirmed that the shortfall against the WCS target has in fact increased to 936, from the 840 shortfall referenced in Figure 3 above.

- 7.55 WC recently confirmed that, as of 01/05/25, the waiting list was 4,003 households. It is important to acknowledge that the households on the waiting list are real people or families in real need now who have been let down by a persistent failure to deliver enough affordable houses. The pressing need/context referenced in the aforementioned appeal decisions evidently remains and the application should be decided in this context.
- 7.56 The eLPR evidence base also recognises the pressing need for affordable housing in Wiltshire. Volume 2 of the Wiltshire Local Housing Needs Assessment Update identifies the overall affordable housing need, concluding that there is a need for a total of 30,010 households over the 18-year period 2020 – 2038, equivalent to an average of 1,667 per annum. The Report continues to state that *“the need for affordable housing and affordable home ownership in particular is very high”* (para. 4.53). The Housing Delivery Paper states that *“equally important to delivering the number of new homes needed over the plan period, the Plan must also provide for different housing needs”*. It continues to state that *“a main task of the plan is, however, is to contribute to the supply of affordable homes in the tenures sought by local communities, whether rented, shared equity or first homes”*.
- 7.57 The pressing need for affordable homes across Wiltshire results in the policy-compliant affordable housing provision being a benefit of substantial weight.

Benefit	Positive weight
Contribution of up to 14 affordable homes to meet an acknowledged shortfall and local need.	Substantial

D: Provision of Green Infrastructure, managed in perpetuity

- 7.58 The NPPF confirms that *“access to high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities”* (para. 102). The Open Space Assessment Update (OSA) also recognises the importance of open space, stating that *“high quality, multifunctional open space also plays an important role in helping to tackle the current climate and ecological emergencies and in supporting the health and wellbeing of Wiltshire’s residents”*. Table 4 of the OSA lists the numerous benefits of Green Infrastructure (see overleaf).
- 7.59 The OSA assesses the existing GI provision. It confirms that there are shortfalls in some open space typologies in the Melksham area, including amenity green space, play space for children and play space for youth. See table 28 of the OSA, extracted overleaf.

Table 28 Open space supply (ha) in urban analysis areas (by parish)

Parish	Allotments	Amenity Green Space	Park and Recreation Ground (Combined)	Play Space (Children)	Play Space (Youth)
Amesbury	-2.14	0.09	1.41	-2.42	-3.23
Box	-0.33	0.23	10.06	-0.81	-0.99
Bradford-on-Avon	0.51	-2.20	0.10	-1.37	-2.82
Bulford	-1.27	-4.57	-3.43	-1.20	-1.47
Calne	-4.06	-1.93	-13.81	-3.58	-5.17
Chippenham	-4.18	21.75	-19.49	-8.12	-10.17
Corsham	-1.13	2.15	-7.55	-2.14	-3.77
Cricklade	-0.80	2.63	-1.58	-0.86	-1.21
Devizes & Roundway	-0.64	11.60	-12.08	-3.28	-4.76
Downton	1.09	0.10	-3.26	-0.17	-0.94
Durrington	-1.68	1.15	-5.96	-1.73	-1.93
Hilperton	-0.28	-4.15	2.50	-0.94	-1.61
Laverstock	-1.08	16.44	16.28	-1.55	-2.39
Lyneham and Bradenstoke	-0.92	2.60	-4.16	-1.21	-1.66
Malmesbury	-0.99	-3.00	-4.86	-0.68	-1.72
Marlborough	-1.19	22.23	0.28	-1.75	-2.55
Melksham & Melksham Without	-1.99	-0.27	0.99	-4.43	-6.40
Mere	2.28	-1.50	3.67	-0.55	-0.94

Table 4 Benefits provided by GI

Environmental
• Supports and provides biodiversity (which underpins healthy and resilient ecosystems) and species movement/dispersal including through providing habitat, wildlife corridors and stepping-stones. • Provides climate change mitigation and adaptation e.g., through providing flood and soil erosion protection, carbon sequestration and storage, and urban cooling. • Improves air and water quality (pollution absorption and removal). • Enables food production and supports pollination. • Supports and creates attractive and sustainable places and landscapes i.e., quality placemaking and place keeping.
Social/health and wellbeing
• Provides opportunities for outdoor recreation, exercise, play and access to nature. • Provides attractive and safe spaces for people to enjoy and improve social contacts – a key component of ‘liveable’ towns and cities where people want to live. • Supports the development of skills and capabilities. • Improves air and water quality, provides urban cooling and shade, reduces noise pollution. • Provides green active travel routes.
Economic
• Provides attractive places to live and work, attracting inward investment and tourism. • Increased land and property values. • Supports sustainable homes and communities e.g., through providing local food and building materials, encouraging low carbon lifestyles e.g., through well connected and attractive walking and cycling routes. • Provides health and wellbeing benefits that result in avoided healthcare costs. • Provides local food, energy, and timber production. • Climate change mitigation and adaption.

Figure 3: OSA extract

- 7.60 The proposals would deliver significant, attractive, multi-functional on-site public open space. It would be significantly in excess of what would be required by the WCS and consist of an internal footpath, amenity greenspace and play space for children.

- 7.61 As stated, the NPPF confirms that “*access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities*” (para. 103). Indeed, this has been emphasised in recent times due to the pandemic. The on-site green infrastructure provision, which would be managed in perpetuity, is a social benefit to be given significant weight, responding to the deficiencies in the local area.

Benefit	Positive weight
Provision of green infrastructure	Significant

Economic Benefits

E. Provide employment opportunities for the construction industry and benefit the wider construction industry supply chain

- 7.62 The site is deliverable. The site would be sold to a housebuilder and it is anticipated that the development could be built out in c. 2 years from approval of the last reserved matter and so the proposals would provide for 2 years of economic benefits for the construction industry. The House Building Federation (HBF) calculator tool estimates that 48No. dwellings would support the employment of 166 people, provide 2 apprentices, graduates or trainees. It also estimates that the development would generate £1.28m in tax revenue including £96,600 in Council Tax².

F. Spending in Local Shops and Businesses

- 7.63 The permanent economic benefits would accrue to the local shops and businesses in Semington and the surrounding area. The addition of up to 48 dwellings would help to maintain and possibly enhance local services and facilities, through the additional spending power of the new residents, in accordance with WCS policy CP1 and the NPPF.

G. Employment creation

- 7.64 It can be anticipated that the village shop will result in the creation of a number of jobs. The amount will be determined by the operator and the opening hours.

Benefit	Positive weight
Provide employment opportunities for the construction industry and benefit the wider construction industry supply chain.	Significant
Result in spending in local shops and businesses.	
Employment creation	

² Appendix 23: HBF Calculator Estimations

Environmental Benefits

H. Enhance biodiversity

- 7.65 The Preliminary Ecological Appraisal and BNG Assessment demonstrate that the outline proposals would achieve a net gain in biodiversity through a mix of on-site initiatives and off site or habitat unit purchase. Moderate weight is given to this benefit.

Benefit	Positive weight
Enhance biodiversity.	Moderate

I. Provide locationally sustainable development and enhance the sustainability of Semington

- 7.66 As demonstrated in the Transport Statement, there are a number of local services/facilities on offer within easy walking/cycling distance of the site, as well as employment opportunities. There are regular bus services offering regular connections to larger settlements in the surrounding area. The site is locationally sustainable.
- 7.67 Furthermore, the provision of a village shop will enhance the sustainability of Semington. Residents of the village will be able to walk/cycle to the new shop to pick up essential goods, including food. They will no longer need to cycle further afield, catch a bus or drive to do top-up shopping.
- 7.68 The environmental benefit of providing a locationally sustainable development that will also enhance the sustainability of Semington is to be given significant weight.

Benefit	Positive weight
Provide locationally sustainable development and enhance sustainability of Semington	Significant

Summary

- 7.69 The application proposals would deliver a package of social, economic and environmental benefits, including a meaningful contribution to the land supply and affordable housing units. Cumulatively, these benefits would attract substantial weight in favour of the proposal.

Benefit	Positive Weight
Provision of a village shop	Significant
Contribution of up to 48 deliverable homes to boost supply.	Substantial
Contribution of up to 14 affordable homes to meet an acknowledged shortfall and local need.	Substantial
Provision of green infrastructure	Significant
Provide employment opportunities for the construction industry and benefit the wider construction industry supply chain. Result in spending in local shops and businesses. Job creation in village shop	Significant
Enhance biodiversity	Moderate
Provide locationally sustainable development and enhance the sustainability of Semington	Significant
Substantial package of benefits	

Table 1: Weighted benefit

8.0 Conclusion

- 8.1 The site is allocated for housing and a village shop in the made Semington Neighbourhood Plan. The application proposes up to 48 homes and a Village Shop in accordance with Policy SEM10 of the Neighbourhood Plan. The application submission reflects positive engagement with the community of Semington, the Parish Council and Parish Council Neighbourhood Steering Group. The proposals were presented at a community consultation event and supported.
- 8.2 The application submission demonstrates that there are no adverse impacts of developing the site. The proposals deliver a package of social, economic and environmental benefits, including a village shop, a mix of market and affordable homes and green infrastructure. Cumulatively, these benefits would attract substantial weight in favour of the proposals.
- 8.3 The Council accepts that it is unable to demonstrate a 5-year housing land supply. The current position is 2.42 years, which equates to a shortfall of 9,561 homes. Para. 11 of the NPPF indicates that, in such circumstances, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. There are no adverse impacts that would significantly and demonstrably outweigh the benefits. The presumption in favour of sustainable development' applies and the application must be decided in this context.
- 8.4 It has been demonstrated that the application proposals comply with the development plan. The application should be approved without delay.

