



Land at Whitlocks, Bishopstone, Wiltshire

PLANNING STATEMENT

Including Affordable Housing Statement and
Draft Heads of Terms

Prepared on behalf of: Cherrington Planning for The Clumber
Trustee Co Ltd and Quay Hill Trustee Co Ltd

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1. Introduction

1.1 This Planning Statement has been prepared in support of a detailed planning application, on behalf of The Clumber Trustee Co Ltd and Quay Hill Trustee Co Ltd ('the Applicant'), in respect of land at Whitlocks, Bishopstone, Salisbury, Wiltshire ('the Site'), as defined on the Site Location Plan (**Appendix 1**). The Site is located within the authority of Wiltshire Council (WC).

1.2 The proposed description of development for this application is as follows:

Detailed Planning application for the Erection of 9no. dwellings including 4no. Affordable Homes with associated infrastructure.

1.3 This Application follows a withdrawn Application (**Ref: PL/2025/03116**); a Full Planning application for the Erection of 15no. dwellings including 6 Affordable Homes with associated infrastructure. This Application addresses comments raised during the course of PL/2025/03116 and the reasons for withdrawing the application.

1.4 Located between Meadow View and Whitlock Rise, the site is accessed directly from the Broad Chalke Road from its southern boundary. Sitting within one of 6 clusters of built development that make up Bishopstone (as identified in the Bishopstone Plan), the Application Site is located at the eastern edge of the village, comprising approximately 1.29 hectares (c.3.2 acres) of farmland and barns used for overwintering cattle.

1.5 The full red line incorporates the area proposed for development along with areas for Biodiversity Net Gain, which creates a buffer to the north of the site, and a package treatment plant that will service the development. The area to be developed is approximately 0.73 hectares.

1.6 The Site forms land that is identified in the Bishopstone Plan as land within the village capable of development and is an identified built area in the Bishopstone Plan. With existing housing developments either side of the site, the proposals represent a coherent and logical location for development that is consistent with adjacent land uses and retains the overall settlement pattern, providing a genuine opportunity to deliver sustainable development at a scale that is commensurate to its physical setting as part of Bishopstone.

1.7 The emerging Local Plan was submitted for examination on the 28th November 2024 but does not currently form part of the Development Plan. Therefore, this Planning Statement is focused on the extant Development Plan, principally the Wiltshire Core Strategy (WCS).

- 1.8 The Inspector wrote to Wiltshire Council (WC) in December 2025 expressing that the emerging Wiltshire Local Plan is currently unsound but could be made sound if substantial further work is undertaken within a realistic timetable. (**APPENDIX 2: Inspectors' post Stage 2 hearings Letter 22 December 2025**)
- 1.9 A response to the Inspector was issued by Wiltshire Council on the 30th January including a programme of works to address the Inspector's concerns and to identify two options for the Inspector's consideration: Option A – Plan end date of 2038 or Option B – extending the plan period to 2042. (**APPENDIX 3: Wiltshire Council's Letter to Inspectors 30.01.26**)
- 1.10 The emerging Local Plan remains capable of being a material consideration in the determination of this planning application however the weight to be afforded to the emerging Local Plan is considered limited. This is discussed further within this Planning Statement in the context of paragraph 49 of the NPPF.
- 1.11 It is the accepted position of WC that it cannot demonstrate a sufficient supply of deliverable housing sites to meet its 5-year housing land supply requirements. At the time of drafting this Planning Statement, the land supply position is calculated to be approximately **2.42yrs** (Housing Land Supply Statement – June 2025 – Base Date April 2024). This figure was recently confirmed at Appeal (**PINS Ref: APP/Y3940/W/25/3369892** - November 2025).
- 1.12 This represents a serious and significant shortfall and the consequence of this is that the presumption in favour of sustainable development (the 'tilted balance') is engaged. In applying the tilted balance, this requires planning applications to be determined in accordance with paragraph 11d of the NPPF and for planning permission to be granted unless the adverse impacts of doing so would **significantly** and **demonstrably** outweigh the benefits.
- 1.13 The starting point for the determination of this planning application must therefore be that the presumption in favour of sustainable development, (the 'tilted balance') is engaged and planning permission should only be refused where the provisions of paragraph 11d of the NPPF would suggest that development should be resisted.
- 1.14 A Community Consultation was undertaken in November 2024 where the original 15-unit scheme was presented. In general, the scheme was positively received.
- 1.15 The proposals for this Application were presented prior to the usual Bishopstone Parish Council meeting on the 19th January 2025 where the public were also invited to attend and again the scheme was positively received.
- 1.16 Full details of this engagement, and how this process has been considered in the preparation of this planning application, are set out in the *Community Consultation Report* and *Community Consultation Addendum* submitted with this application.

- 1.17 The purpose of this Planning Statement is to set out the planning justification for the proposed development, taking into account the relevant policies and objectives of the Development Plan alongside material considerations, including the NPPF (December 2024).
- 1.18 This Planning Statement demonstrates how the proposals constitute a sustainable pattern of development that is consistent with the specific policies contained within the Development Plan and critically, that any harm arising does not significantly or demonstrably outweigh the benefits of the proposals.
- 1.19 This Planning Statement is structured as follows:
- **Section 2** introduces the site, including the wider context and relevant planning history;
 - **Section 3** introduces the proposed development;
 - **Section 4** outlines the relevant planning policy context for the consideration in the assessment of the proposals;
 - **Section 5** assesses the proposed development within this context;
 - **Sections 6 and 7** set out the Affordable Housing Statement and Draft Heads of Terms respectively; and
 - **Section 8** undertakes the 'planning balance' and overall conclusion.
- 1.20 This planning application is supported by a suite of technical reports, surveys and site investigations which demonstrate that the proposals are appropriate and will deliver a well-planned and sustainable pattern of development. The documents which form this application are listed within the supporting *Cover Letter*.
- 1.21 This Planning Statement, when read alongside the suite of supporting documents, demonstrates that the proposed development represents a sustainable pattern of development that is in broad compliance with the Development Plan. Moreover, any harm resulting from the development, does not meet the threshold that would justify a refusal.
- 1.22 Accordingly, it is respectfully concluded that there is a compelling and justifiable case for planning permission to be granted.

2. Site Context & Planning History

Site Location

- 2.1 Sitting within the Cranborne Chase National Landscape and the Chalke Valley, the 'Small' (as defined in Wiltshire's Core Strategy) village of Bishopstone is rural in nature, but not isolated, with good road links to Salisbury which is situated c.6 miles to the northeast of the village with its railway links to London.
- 2.2 As a 'Small' village Bishopstone does not have a defined settlement boundary however, as defined in the Bishopstone Plan (2015), there are six main clusters of development that make up the village, as shown in Figure 1 below.
- 2.3 Bishopstone itself benefits from a Local Pub - The White Hart and a Village Hall with a full and busy programme of activities such as Pilates, yoga, play groups and a community café.
- 2.4 There are bus stops to the west and east of the site with the bus stops to the east within 80m of the proposed access. These have services to Salisbury and Shaftesbury with the number 29 bus running from Bishopstone to Salisbury and Shaftesbury every hour and the 29A servicing Salisbury and Broad Chalke via Bishopstone.
- 2.5 Whilst Bishopstone does not have a primary school of its own, provision is provided at Broad Chalke and Coombe Bissett, both of which have capacity. Broad Chalke, 2 miles from the site, has capacity for 210 with 199 in attendance. Coombe Bissett, 3 miles from the site, has capacity for 119 with 99 on the register¹. Both schools are accessible by public bus via the 29 and the 29A
- 2.6 The closest train station is located approximately 7 miles (15 minute drive or 39 minute cycle) from the Site. Salisbury Railway Station serves the South Western and Great Western Railway lines, offering regular services to Portsmouth Harbrough, Cardiff Central, Exeter St Davids, Romsey and London Waterloo.

¹ <https://www.get-information-schools.service.gov.uk/>

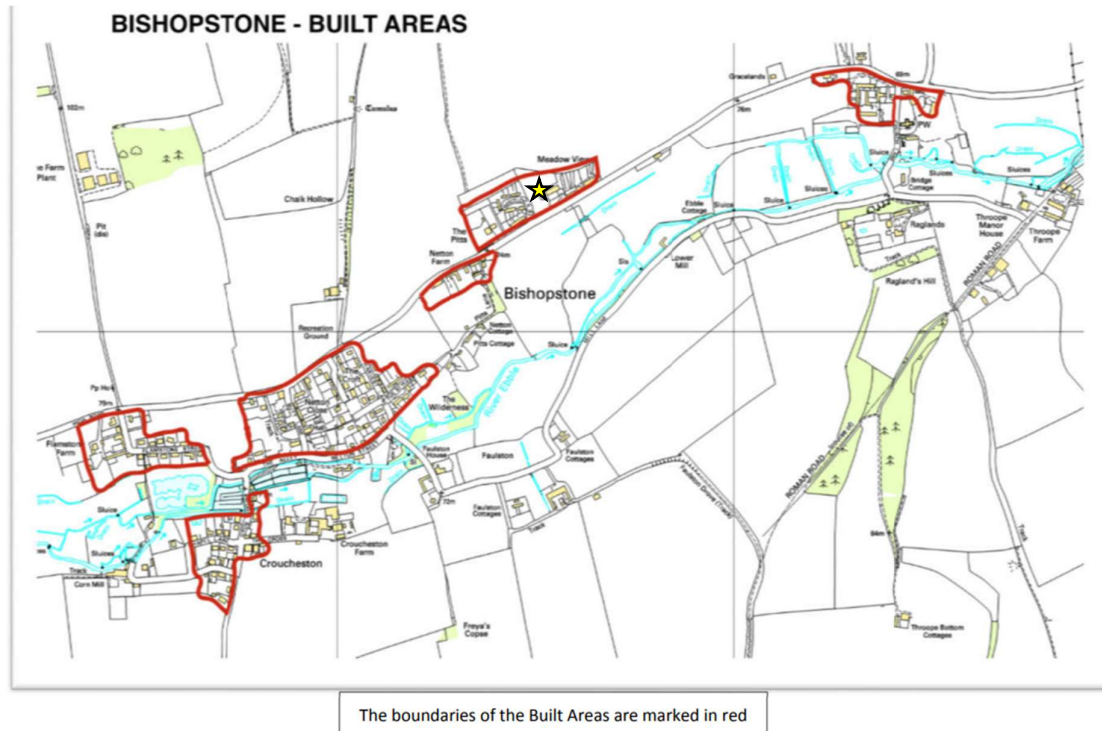


Figure 1: 6 x Built areas that make up Bishopstone village as defined in the Bishopstone Plan (yellow star indicates site)

- 2.7 The full redline of the site extends to approximately 1.29 hectares. This red line incorporates the area proposed for development along with areas for Biodiversity Net Gain and a package treatment plant that will service the development. The area to be developed is approximately 0.73 hectares.
- 2.8 The separate red line area to the south is an area of land retained specifically for the purpose of providing a package treatment plant, BNG and Nutrient Neutrality Mitigation Strategy. The land surrounding this southern red line area is owned by Wiltshire Wildlife Trust, having been purchased in 2024 from The Clumber Trustee Co Ltd and Quay Hill Trustee Co Ltd (applicant). Communication and collaboration with Wiltshire Wildlife Trust was undertaken in the preparation of the proposals for both the 15 and 9 unit applications.

Landscape

- 2.9 On an incline, the Site borders open countryside to the north and tapers down to the southern edge of the site bordering the Broad Chalke Road, with the western and eastern boundaries of the site bordering existing residential development.
- 2.10 The Site is situated within a designated landscape, sitting within the Cranborne Chase National Landscape and the Chalke Valley.

- 2.11 The elevated location of the Site and the local ridge and river valley (River Ebble) landforms mean the Site is perceived in a variety of views from the local landscape, albeit in the context of existing development either side of the site; however these views are limited by topography intervening built form, vegetation and landform.
- 2.12 The proposed site and extended areas are typical agricultural grazing land with some dilapidated agricultural barns.
- 2.13 There is a Public Right of way (**Ref: BST015**) that crosses to the north of the proposed position of the Package Treatment Plant.

Ecology

- 2.14 The Site is situated within an agricultural landscape, albeit with existing residential properties on either side and is predominantly managed by arable and grazing practises, alongside established residential developments either side.
- 2.15 The application site is comprised of relatively species-poor grassland, woodland and scrub habitat; which are common and widespread habitat types likely abundant in the local area.
- 2.16 The Site also lies within the catchment of the River Avon Special Area of Conservation and is therefore subject to nutrient neutrality requirements.
- 2.17 The site has evidence of the previous presence of badgers in the area with precautionary working methods required for reptiles and nesting birds.

Arboriculture

- 2.18 An *Arboricultural Method Statement*, *Tree Protection Plan* and *Tree Constraints Plan* have been submitted with this application. No category A trees have been identified on the site.
- 2.19 The proposed development necessitates the loss of some small trees to necessitate the access and erection of proposed dwellings, however their contribution to the landscape character of the Site and surrounding area is considered limited. Their loss can readily be mitigated by new tree and shrub planting which are proposed as part of the overall masterplan for landscaping.
- 2.20 The development proposed abuts the RPZ of Shelterbelt 1 and therefore to comply with BS5837:2012 recommendations, mitigation measures will need to be applied. These are detailed in section 6 of the *Arboricultural Method Statement*.

- 2.21 All of the remaining surveyed trees (including the off-site Norway Maple) can be fully protected in accordance with BS5837:2012 recommendations (as shown on the *Tree Protection Plan*) for the duration of the demolition and construction phases of work on this project.

Flood Risk and Drainage

- 2.22 The EA Flood Map for Planning confirms that the Application Site is located entirely within Flood Zone 1 (low probability) and in respect of the risk from surface water flooding the Site is categorised as at Very Low risk of flooding. In respect of groundwater flooding the Site is within an area where groundwater flooding is not likely. The proposed development is therefore suitable for the level of flood risk (from all sources) associated with the Site.

Heritage and Archaeology

- 2.23 The site is not in a Conservation Area nor are there any Listed Buildings or Scheduled Monuments on, or in proximity to, the site.
- 2.24 A Geophysical Survey was undertaken of the site and commented on during the process of Withdrawn Application **PL/2025/03116**.
- 2.25 At the time the County Archaeologist commented:

"The geophysical survey did not reveal any anomalies that might represent the presence of buried archaeological remains within the application site. The survey did detect the line of three modern services and anomalies probably indicative of spreads of modern debris.

In view of the results of the geophysical survey, I am satisfied that no further archaeological assessment is justified prior to the determination of this application. As geophysical survey cannot authoritatively prove a negative and the anomalies resulting from modern disturbance may mask archaeological features, there will be a need for some archaeological investigation should the proposed development be permitted. This can be secured by an appropriately worded condition(s)..."

- 2.26 Circumstances have not altered at the site, therefore it can be assumed that the same conclusions will be reached and therefore there are no archaeological concerns on the site, and WC are invited to provide appropriate conditions to accompany the application.

Planning History

- 2.27 Withdrawn Application **PL/2025/03116**: *Full Planning Application, for the erection of 15 no. residential dwellings, with 6 no. Affordable homes and 9 no. open market dwellings with associated infrastructure on land at Whitlocks, Bishopstone, Salisbury.*
- 2.28 It is important, at this early juncture, to summarise the comments that were received during this process as these have informed the proposals for this application.
- 2.29 As the site is located within the Cranborne Chase National Landscape, comments were received from their Principal Landscape and Planning Officer. It should be noted that these comments did not constitute an objection.
- 2.30 The Officer's comments included concerns relating to:
- The spread of development "beyond any 'infill' line between the existing developments" and that "plots 9 to 15 would need to be removed, and the upper slope retained as a grassy hillside".
 - The new access point "could change the landscape character of the road and associated verge" due to the level of hedgerow removal required coupled with the topography of the site.
 - The choice of plant species chosen for the domestic areas of the development.
- 2.31 No objections were made by Drainage, Natural England and Waste.
- 2.32 Bishopstone Parish Council also commented on the application. It is important to note that the council did not object to the principal of development on the site, but that the scale of development proposed was considered too large for its rural setting.
- 2.33 Highways commented that parking and turning were acceptable along with the additional vehicles on the highway. Other comments included:
- Concerns over planting on front not being set back 2m from the highway which would affect visibility which they argue can't be achieved;
 - Cycle parking provision;
 - Pedestrian footway requested to improve connectivity with housing either side.
- 2.34 Salisbury and Wilton Swifts requested that Swift boxes be included within the scheme.



- 2.35 Following the above comments, the scheme has been revised, taking the above comments on board. The proposals now better reflect the spread of adjacent development. On the eastern side of the development, the two pairs of semi-detached dwellings (plots 3 to 6) are in line with the dwellings at Meadow View, with the entirety of the plots not extending further northwards than the curtilages of the existing development.
- 2.36 To the west, the parking and garages for plots 8 and 9 will not extend beyond the garden boundaries of the northernmost dwellings on Whitlock Rise. The area to the north of site is under the applicant's control and will be retained as a grassed area for ecological enhancements, creating a BNG buffer that will enhance the natural beauty of the area, along with the additional site wide planting proposed. These revisions to the proposed scheme respond positively to concerns from the Cranborne Chase National Landscape and the Parish Council.

3. Proposed Development

Development Quantum & Design

- 3.1 This application seeks detailed planning permission for the construction of 9 dwellings; 40% (4no.) of which will be Affordable, landscaping, associated access creation and infrastructure as presented within the Proposed Site Plan (**Doc Ref: PL-02-B**).
- 3.2 A key component of the design strategy has been landscape considerations, taking into careful consideration comments made by the Cranborne Chase National Landscape made under the Withdrawn Application PL/2025/03116 as discussed in paragraphs 2.27 – 2.36 above.
- 3.3 In formulating the proposals, it was important to the Applicant to have an open book, community minded approach to the proposal so a community consultation was undertaken for the previous 15-unit scheme and subsequently a consultation was undertaken for the proposals subject to this application. The purpose being to gauge the community's response and to look to the community for suggestions and feedback on the proposals.
- 3.4 Attention is drawn at this juncture to the supporting *Community Consultation Report & Addendum* which has been submitted with this application, which sets out the approach to the consultation and resultant feedback. The feedback received has been considered and concerns have been taken onboard and where possible, fed into the planning application.
- 3.5 The overriding feedback from the January 2026 consultation was positive, with a:
- Positive reception to the reduce number of houses.
 - Positive reaction to the affordable housing.
 - Positive reaction to the design of the houses and the variance of dwellings.
 - Positive reaction to the increased area of grassland at the rear of the site.
- 3.6 The proposed design adopts the rural farmstead character typical of Bishopstone and the wider Ebble Valley, using a broken cluster of single- and two-storey forms with simple gabled roofs to sit quietly within the Cranborne Chase National Landscape.
- 3.7 A locally distinctive palette of natural slate, plain clay tiles, textured render, red brick and knapped flint anchors the building in its setting, while dark-stained timber boarding to upper-storey elements helps these forms visually recede against the hillside backdrop to the north.

- 3.8 Glazing is used sparingly as barn-style openings, maintaining the simplicity associated with traditional rural buildings. Together, the form, layout and materials create a sensitive, low impact proposal that fits comfortably within the established character of the Ebble Valley.
- 3.9 Each dwelling is provided with private amenity space. Bike and bin storage is provided in garages and/or carports and parking provision to required standards is provided.
- 3.10 There is ample space within curtilages for the storage of bins for waste and recyclable waste, with a bin collection point identified on the proposed site plan (**Doc Ref: PL-02-B**).
- 3.11 The key features of the proposed development are as follows:
- 9 new homes, including affordable housing at 40%;
 - A mix of house types and sizes to meet locally identified need;
 - Pedestrian link.
- 3.12 Landscape is also key consideration in the design scheme with the proposed built form complemented by a comprehensive landscape strategy as presented on the Illustrative Landscape Masterplan (**Doc Ref: 24.1835 Land at Bishopstone-LVIA 30 Jan 26 P3**). The key elements of the landscape design strategy include:
- Softening the transition to the wider countryside by reinforcing the existing hedgerow boundaries.
 - Strengthen and reinforcement of the existing settlement pattern, respecting the wider topography and avoiding the placement of built form on more elevated areas of the Site.
 - Retention of Public Right of Way to the north of the package treatment plans.
 - Trees & hedgerows are retained where possible with new tree and hedge planting proposed along with a comprehensive BNG scheme.
- 3.13 In summary the scheme will be built to high design standards, using sustainable design principles (energy-efficient construction, provision for electric vehicle charging, etc.) and vernacular architecture that respects local character. This will provide quality housing in a sustainable location, within existing built form of the village, helping meet development needs without sprawl.

Proposed Housing Mix

- 3.14 This proposed development of 9 dwellings provides a mixture of detached, semi-detached and bungalow units with plots positioned to make the most of the views but also to avoid overlooking of neighbouring units, ensuring that privacy is retained (**Doc Ref: PL-02-B**).
- 3.15 The scheme provides for a policy compliant level of affordable housing at 40% (4 semi-detached dwellings). Tenure is to be discussed with the Housing Officer as part of the planning application process. Units 3, 4, 5, & 6 are designated as the Affordable dwellings.
- 3.16 Affordable housing discussions have been held with Whitehorse Housing, a local Wiltshire Affordable Housing provider, who have expressed interest in taking on the Affordable element. Working with a local affordable housing provider from early outset was important to the scheme to meet the requirements of the Applicant to ensure that, where possible, the affordable units were made available to the local community in the first instance, and to help to address the concerns raised at the Community Consultation, that the units were made available, where possible, for local people in the local community.
- 3.17 The proposed housing mix is as follows:

Unit	Sqm	Sqft	Beds
1	120.0	1291	3
2	120.0	1291	3
3	80.0	860	2
4	88.0	950	3
5	88.0	950	3
6	80.0	860	2
7	156.0	1679	4
8	156.0	1679	4
9	175.0	1884	4/5

Table 1: Proposed Housing Mix

Vehicular Access

- 3.18 The scheme seeks to introduce an access approximately mid-way along the frontage onto the Broad Chalke Road. In doing so, the existing substandard access will be blocked off. To ensure that the proposed access is safe and suitable to serve the proposal, the recorded 85th percentile speeds from the speed survey have been used to demonstrate visibility splays in accordance with Manual for Streets, as shown on the submitted Access Drawing found at Appendix 4 of the submitted *Transport Statement* (TS) (**Doc Ref: 6002/001/C**).

- 3.19 Swept path analysis has been conducted to demonstrate that refuse vehicles and a fire tender can be accommodated by the proposed access as shown at Appendix 5 of the TS (**Doc Ref: 6002/201 Rev. E & 203 Rev. B**).
- 3.20 The proposed scheme provides safe and suitable access to the site and internal layout will be achieved for all users. Any significant impacts from the development on the transport network and in terms of capacity and congestion or on highway safety will be cost effectively mitigated to an acceptable degree. It can therefore be concluded that the proposals follow the guidelines set out in NPPF, PPG, the Wiltshire Core Strategy, and the Local Transport Plan.

Pedestrian Connectivity

- 3.21 Following commentary from Highways during Withdrawn Application **PL/2025/03116**, consideration has been given to pedestrian connectivity along the front (southern) portion of the site. However, for engineering reasons; including an existing telegraph pole, landscape impact and connectivity to 3rd party land at Whitlocks Rise, this has not been possible.
- 3.22 A pedestrian link has been provided to the western side of the development, adjacent to the Affordable Units (3, 4, 5, & 6) creating pedestrian access through to the Broad Chalke Road on the Meadow View side of the development and ongoing access to bus stops on either side of the carriageway. This prevents pedestrian's having to walk along the road at the front of the site.

Parking

- 3.23 The scheme provides a policy compliant number of parking spaces – 27no. total, including ample visitor spaces. The proposed visitor spaces are distributed throughout the site and predominately comprises on-street parking bays to reduce the level of on-street parking, maintaining the operation of the street and footways.
- 3.24 Parking is detailed on the Site Plan (**Doc Ref: PL-02-B**) which sets out the proposed provision for on-plot parking, garages, visitor spaces. EV Charging points will be provided within the development.

4. Policy Context

Development Plan

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications should be in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 In this case the relevant development plan comprises the following:
- Wiltshire Core Strategy (WCS) – adopted January 2015
 - Wiltshire Housing Site Allocations Plan – adopted February 2020
 - The Bishopstone Plan – 2015
 - Cotswolds National Landscape Management Plan 2025 – 2030
- 4.3 WC is currently in the process of preparing a Local Plan Review, this was submitted for Examination in November 2024. The Inspector recently wrote to Wiltshire Council in December 2025 expressing that the emerging Wiltshire Local Plan is currently unsound but could be made sound if substantial further work is undertaken within a realistic timetable. WC's response (30th January 2026) details a programme of works and presents 2 options for plan periods for the Inspector's consideration. Given that the letter outlines adoption in 2027, and the unknown response of the Inspector, the status of the emerging Local Plan as a material consideration in the determination of this planning application can only still be afforded limited weight.
- 4.4 Where appropriate, reference is made to the Local Plan Review below.

Wiltshire Core Strategy

- 4.5 The strategic planning framework for Wiltshire is currently set out in the adopted Wiltshire Core Strategy (WCS) which covers the plan period to 2026. Within the WCS Bishopstone is identified as a 'small' village, which is identified Principal Settlement through **Core Policy 1**.
- 4.6 CP1 recognises and accepts that modest development may be appropriate at Small Villages, to respond to local needs and to contribute to the vitality of rural communities.
- 4.7 **Core Policy 2** sets out the delivery strategy for development across Wiltshire to 2026. The policy sets out the delivery of at least 42,000 homes, with a minimum housing requirement of 10,420 dwellings within the South Wiltshire Housing Market Area (HMA), within which the Application Site is located.

- 4.8 In this context, it should be noted that the housing requirements provided for each Principal Settlement, Market Town and Community Areas are 'indicative' requirements. Within the WCS (paragraph 4.20) it is stated that:

"The indicative figures also allow a flexible approach which will allow the council ... to respond positively to opportunities without being an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan." (Our emphasis)

- 4.9 It is therefore the case that the indicative housing requirements are not intended to act as a target or cap on development and that where sustainable development opportunities exist, the WCS, specifically the delivery strategy (Core Policy 2), is not intended to frustrate such opportunities, where these support the strategic objectives of the Plan.

- 4.10 Within the limits of development, as defined on the Policies Map, there is a presumption in favour of sustainable development. Outside of these defined limits, development is restricted, unless permitted by other policies of the plan ('exception policies').

- 4.11 Bishopstone, a small village, does not have a defined settlement boundary, however the Bishopstone Plan, at Appendix B, identifies six clusters of Built Area, of which the Site falls into. Core Policy 2 states that outside the defined limits of development:

"At the Small Villages development will be limited to infill within the existing built area. Proposals for development at the Small Villages will be supported where they seek to meet housing needs of settlements or provide employment, services and facilities provided that the development: i) Respects the existing character and form of the settlement ii) Does not elongate the village or impose development in sensitive landscape areas iii) Does not consolidate an existing sporadic loose knit areas of development related to the settlement."

- 4.12 The proposals arguably meet all the criteria identified in Core Policy 2, and will make a contribution to housing need in the village through the provision of smaller homes of different types, including Affordable Housing provision.

- i. The proposed scheme respects the existing character and form of the settlement being situated between an existing cluster of development.
- ii. The proposals do not elongate the village, and whilst the development is within a sensitive landscape area comprehensive mitigation has been provided to ensure the impacts of the proposed development are minimised.
- iii. The proposals round an existing identified (The Bishopstone Plan) cluster of development that make up the character and typography of Bishopstone. The proposals are not within a sporadic loose knit area of development.

- 4.13 It must be noted however that Core Policy 2 is a policy that is based on a housing requirement that pre-dates the NPPF requirement to identify Local Housing Need (LHN) on the basis of the standard methodology. Core Policy 2 is a policy that can be considered 'most important' (pursuant to paragraph 11d of the NPPF) and therefore, in the context of the acknowledged housing land supply shortfall and the basis upon which CP2 was constructed, it is reasonable to conclude that for the determination of this application it is out of date.
- 4.14 The WCS is premised on a housing requirement which is out of date and therefore the wider Spatial Strategy, which functions to distribute development to meet identified needs, is also considered to be out of date. In any event, indicative housing requirements established in the WCS are not intended to act as an arbitrary cap on development, as explained above.
- 4.15 The relevant policies set out in the WCS are summarised below.
- 4.16 **Core Policy 3** requires that all new development will provide the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposed development. Infrastructure requirements will be delivered directly by the developer and/or through an appropriate financial contribution.
- 4.17 **Core Policy 33: Spatial Strategy: Wilton Community Area** sets out the specific issues to be addressed in planning for the Wilton Community Area.
- 4.18 **Core Policy 41** sets out the sustainable construction and low-carbon energy requirements of the WCS. New development, building conversions, refurbishments and extensions will be encouraged to incorporate design measures to reduce energy demand. All proposals for major development will be required to submit a Sustainable Energy Strategy alongside the planning application outlining the low-carbon strategy for the proposal.
- 4.19 **Core Policy 43** sets out the requirement for affordable housing delivery on sites of 5 or more dwellings. The site lies within the 40% requirement for affordable housing. **Core Policy 45** requires that dwellings must meet the needs of the locality in terms of tenure type and size of dwelling.
- 4.20 Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale as required by **Core Policy 50**. All development proposals should seek opportunities to enhance biodiversity and deliver no net less in the overall biodiversity value of a site.
- 4.21 **Core Policy 51** requires development proposals to protect, conserve and where possible enhance landscape character. It further states that development must not have a harmful impact upon landscape character and for any negative impacts to be mitigated.

- 4.22 **Core Policy 57** requires a high standard of design in all new developments. New development will need to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through; enhancing local distinctiveness; retaining and enhancing existing landscaping and natural features; positively responding to existing townscape and landscape features. Applications for major development should be accompanied by a detailed Design and Access Statement.
- 4.23 **Core Policy 60** seeks to reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire. In particular, this will be achieved by planning developments in accessible locations and promoting sustainable transport alternatives to the use of the private car.
- 4.24 **Core Policy 62** requires new development to provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stage. **Core Policy 64** seeks to promote measures where appropriate to reduce reliance on the car and to encourage the use of sustainable transport alternatives.
- 4.25 **Core Policy 67** requires that all new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.
- 4.26 **Core Policy 68** states that development within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and groundwater quality.
- 4.27 **Core Policy 69** seeks to reduce the potential environmental effects on the River Avon SAC including mitigation and prevention measures.

Salisbury District Local Plan Policies 2011

- 4.28 Following the adoption of the WCS, a number of the Local Plan policies were 'saved' and will be replaced as part of the local plan review. This includes **Policy C6** which requires development proposals to have regard for the high quality of the landscape.

The Bishopstone Plan

- 4.29 The Bishopstone Plan (2015), whilst not an adopted Neighbourhood Plan and therefore not part of the statutory development, is still capable of being a consideration of material weight in the determination of this planning application; particularly Appendix B that identifies the Built Areas within the village.

Cranbourne Chase National Landscape Partnership Plan 2025 – 2030

- 4.30 The **Cranborne Chase National Landscape Partnership Plan 2025–2030** is the statutory management plan for the National Landscape, prepared by the Cranborne Chase National Landscape Board. The Partnership Plan sets out a shared vision, key objectives and priorities to guide the conservation and enhancement of the landscape’s natural beauty, biodiversity, cultural heritage and special qualities, whilst recognising that National Landscapes are living, working places where carefully designed development may be appropriate.
- 4.31 The proposals at Whitlocks have been developed with full regard to the objectives and priorities of the Partnership Plan and align with its overarching purpose in the following key respects.

Green and Blue Infrastructure Strategy

- 4.32 The Wiltshire Green Blue Infrastructure (GBI) Strategy, adopted in February 2022, provides an overarching strategy for the next eight years. The Strategy focuses on the natural environment and how, through the creation of a strong, well considered network of green and blue corridors and spaces, it can support adaption and resilience to climate change, halt loss of and improve biodiversity. The Strategy sets out a long-term vision, strategic goals and principles for delivering green and blue infrastructure across Wiltshire by a range of partners and stakeholders.

Wiltshire Design Guide

- 4.33 The Wiltshire Design Guide was adopted in March 2024 and sets out the approach to appreciating the context of proposals and focusing on what is important in design and place shaping to ensure that future development makes a positive contribution to the physical character and heritage of the locality. The guide supports WCS Core Policy 57 in achieving high standards of design in new development.

Material Considerations

- 4.34 The National Planning Policy Framework (NPPF – December 2024) sets out the Government’s planning policies and how these should be applied and is a material consideration in the determination of planning applications.
- 4.35 **Section 2** confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, identifying the three overarching objectives which need to be pursued in mutually supportive ways, these being the economic, social and environmental objectives.

- 4.36 **Paragraph 9** of the Framework confirms that these are not criteria against which every decision can or should be judged and that planning policies and decisions should play an active role in guiding development towards sustainable solutions.
- 4.37 **Paragraph 11** establishes both plans and decisions should apply a presumption in favour of sustainable development. This states for decision-taking this means:
- “c) approving development proposals that accord 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.*
- 4.38 **Section 4** requires local planning authorities to approach decisions on proposed development in a positive and creative way and that decision-makers at every level should seek to approve applications for sustainable development where possible.
- 4.39 **Paragraph 49** requires that planning authorities may give weight to relevant policies in emerging plans in accordance with, the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the relevant policies, and the degree of consistency to the NPPF.
- 4.40 **Section 5** sets out the Government’s objective of “significantly” boosting the supply of new homes. **Paragraph 61** confirms the importance of bringing forward a sufficient amount and variety of land where it is needed in order to ensure that the Government’s objective is delivered.
- 4.41 **Section 8** requires planning policies and decisions to aim to achieve healthy, inclusive and safe places which: promote social interaction; are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life; and enable and support healthy lifestyles.

- 4.42 **Section 9** (Promoting sustainable transport): In assessing applications for development there should be a consideration of the opportunities to promote sustainable transport modes and ensuring that safe and suitable access to the site can be achieved for all uses. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.43 **Section 11** requires planning policies and decisions to promote an effective use of land in meeting the needs for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Local planning authorities should refuse applications which they consider fail to make effective use of land.
- 4.44 At **Section 12** the Framework recognises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. The Framework is explicit in its reference that good design is a key aspect of sustainable development.
- 4.45 To achieve this planning policies and decisions should ensure that developments (**Paragraph 135**):
- a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

- 4.46 **Section 14** requires the planning system to support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.
- 4.47 In planning for climate change, **Paragraph 164** requires new development to avoid increased vulnerability to the range of impacts from climate and for new development to be planned for so that it can reduce greenhouse gas emissions, such as through its location, orientation and design.
- 4.48 When assessing planning applications, local planning authorities should ensure that flood risk is not increased elsewhere (**Paragraph 181**).
- 4.49 **Section 15** requires planning policies and decisions to contribute to and enhance the natural environment. Through **Paragraph 187** this should include minimising impacts on, and providing net gains for, biodiversity.

Local Plan Review

- 4.50 The Wiltshire Local Plan Review was submitted for examination in November 2024 and will replace the WCS as the key Development Plan document for the borough.
- 4.51 The emerging plan is capable of being a material consideration in the determination of this application, if the Inspector's latest concerns can be addressed, and the weight that can be attributed to the plan increases as it advances through the examination process. This is limited at the time of writing.
- 4.52 It is explained in the NPPF (paragraph 49) that local planning authorities may give weight to relevant policies in emerging plans, but in doing so this must consider (amongst other matters) the extent to which there are unresolved objections, the less significant the unresolved objections, the greater the weight that may be given.
- 4.53 In this context, the Local Plan examination Inspectors wrote to Wiltshire Council on the 22nd December 2025 setting out their initial views on the next steps of the Wiltshire Local Plan (**Appendix 6**) identifying several significant issues. These Key Findings relevant to this application include:

Housing Need - The housing requirement is out of date.

- The Local Housing Need (LHN) calculation was already more than two years old at submission.
- Inspectors require:
 - Rebasing the Plan period to 1 April 2023
 - Recalculating housing need
- Extending the Plan period would significantly increase the housing requirement.

Stepped Housing Requirement

- The proposed stepped approach is not justified, not positively prepared, and not supported by evidence or SA.
- It could unnecessarily delay housing delivery.
- Alternative distributions of housing should be tested instead.

Plan Period

- Proposed adoption in **2027** means the Plan will no longer meets the NPPF minimum 15-year requirement.
- Inspectors indicate the Plan period should likely be **extended to 2042**.
- This would require recalculating housing and employment needs and identifying additional land.

- 4.54 The Inspector is satisfied that there is sufficient prospect that the existing legal compliance and soundness deficiencies identified could be overcome. This is, however, subject to the Council outlining an achievable timetable for the preparation and submission of additional evidence that would not unreasonably delay the progress of the Examination.
- 4.55 A programme of works has now been provided along with 2 plan period Options; Option A 2038, and Option B 2042. This does not mitigate the matters of 'significant concern' raised by the Examination Inspectors, however it does provide some indication as to how and when those matters will be addressed. Notwithstanding this, only limited weight can still be given to the emerging Local Plan (pursuant to paragraph 49 of the NPPF).
- 4.56 Whilst only limited weight can be given to relevant policies within the emerging Local Plan at this time, those relevant policies are summarised below.
- 4.57 **Policy 1 Settlement Strategy** details that Development at Small Villages will be limited to respond to local needs and to contribute to their vitality.
- 4.58 **Policy 2** details the Delivery Strategy across Wiltshire between 2020 and 2038 and an additional housing phasing requirement of 10,290 (Phase 1 2024 -2031) and 18, 370 (Phase 2 2031 – 2038). Housing sites are identified within and on the edge of settlement boundaries where development will be supported. Additional housing allocations can be identified through local communities preparing neighbourhood plans and a subsequent site allocation Development Plan document.
- 4.59 Development proposals should support a move to carbon neutrality and adaption to climate change in accordance with a number of criteria detailed in **Policy 4**. **Policy 5** notes that all developments will be required to provide for necessary on-site and where appropriate off-site infrastructure requirements arising from the proposals.

- 4.60 **Policy 76 Providing affordable homes** sets out that at least 40% will be required on sites of ten or more dwellings in areas not designated as rural. The tenure and mix on all sites would normally be the following proportions 65% Affordable Housing for Rent, 10% Shared Ownership and 25% First Homes, but can be reviewed and negotiated on a site-by-site basis.
- 4.61 **Policy 78 Meeting Wiltshire's housing needs**, requires that new housing is well designed to address local housing needs incorporating a range of different types, tenures and sizes of homes. Dwellings should meet Nationally Described Space Standards and provide for accessible and adaptable dwellings to meeting Building Regulations Part M4(2) and M4(3).
- 4.62 **Policy 83** requires that proposals demonstrate that they will contribute positively to health and wellbeing promoting healthy lifestyles. In accordance with **Policy 84**, major new development should make provision for public open space and play facilities.
- 4.63 **Policy 88** includes the requirement for proposals to protect and enhance biodiversity and geodiversity habitats and features of nature conservation. Development proposals should achieve a minimum of 20% biodiversity net gain in accordance with **Policy 89**.
- 4.64 **Policy 98 Ensuring high quality design and place shaping** requires a high standard of design is required in all new developments, noting a number of criteria which proposals should respond to.
- 4.65 With regards to air quality, **Policy 101** states that proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels where air quality is a concern to protect public health, environmental quality and amenity.

Housing Land Supply

- 4.66 The revised NPPF (December 2024) sets out a clear core aim to meet the Government's pledge to deliver 1.5 million new homes in the next five years. Central to this ambition is the introduction of mandatory housing targets for each Local Authority area which is to be calculated by way of a new Standard Method.
- 4.67 WC's most up to date Housing Land Supply Statement is dated June 2025, with a base date of April 2024.
- 4.68 WC is now required to demonstrate a five-year supply, including a 5% buffer and must apply the revised LHN for decision-taking immediately. The consequence of this is that WC is now only able to demonstrate a **2.42 yrs** supply.



- 4.69 This was confirmed in the recent appeal decision in respect of 'Land off Sherston Road, Malmesbury', dated 26th November 2025 (**PINS Ref: APP/Y3940/W/25/3369892**).
- 4.70 Accordingly, paragraph 11d of the NPPF (the 'tilted balance') is triggered and the presumption in favour of sustainable development applied. In such circumstances, the key consideration of the benefits associated with the development and the level of weight attributed to them versus any resultant harm, i.e. the planning balance, is the correct basis upon which this application should be determined.

5. Planning Assessment

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 It is also the case that Section 70(2) of the Town and Country Planning Act 1990 provides that, in dealing with proposals for planning permission, regard must be had to the provisions of the Development Plan, so far as material to the application, and to any other material considerations.
- 5.3 This section outlines the key considerations for the determination of this planning application.

Principle of Development

- 5.4 On the basis of the extant development plan (the WCS), the Application Site is not identified as a location for development, and it falls outside of the defined settlement limits (settlement boundary) where restrictive open countryside policies apply. Consequently, the proposed development is contrary to the adopted WCS policies CP1, CP2 and CP20.
- 5.5 Whilst there is a general presumption against development in Small villages, with Bishopstone, being identified as a “Small village” in the Wiltshire Core Strategy (WCS), some very modest development may be appropriate at small villages to respond to local needs and to contribute to the vitality of rural communities.
- 5.6 Paragraph 73 of the NPPF recognises the important contribution that small and medium sized sites can make to meeting the housing requirements of an area, which are often delivered quickly. It also places a considerable emphasis on windfall sites, in paragraph 73d that Local Authorities should “...support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes” (underlined for emphasis).
- 5.7 The use of windfall sites within Small villages was further supported in a recent appeal decision (**PINS Ref: APP/Y3940/W/24/3351527**) where the Inspector stated at paragraph 31 that:

“....there have been chronic problems with housing delivery at the first tier settlements; and the Council has been unsuccessful in resisting a number of recent appeals at lower tier settlements including Large and Small Villages. The inevitable conclusion is that, although some representations claim that development is not necessary, new house building will be required on unallocated sites. Priority should be given to the more sustainable locations.” (underlined for emphasis).

- 5.8 Ultimately, WC does not have a five-year supply of deliverable housing land and there is a significant shortfall of housing and affordable homes, resulting in a land supply of just **2.42yrs**. In such circumstances, and in accordance with paragraph 11 of the NPPF, including footnote 8, policies which are the most important for determining applications are out of date. In this case these 'most important' policies are CP1, CP2 and CP20.
- 5.9 There is little doubt that the proposals meet the overarching objectives of the planning system identified at Paragraph 11 of the NPPF:
- **Economic objective:** the proposal will contribute towards growth in the housing market, the creation of jobs within the development industry and increased local expenditures. The proposal will also have a positive economic impact via increased New Homes Bonus and Council Tax receipts as well as CIL contributions.
 - **Social objective:** the development will provide housing to meet the identified needs of present and future generations in a well-designed and safe environment bolstering the local community through providing homes including affordable for local people and the inevitable creation of numbers to support the local primary schools.
 - **Environmental objective:** the proposal will make a positive contribution towards the built environment, safeguarding local landscape character, ecological interests and embracing the principles of sustainable construction embodied within the Building Regulations.
- 5.10 These proposals will make a small, but valuable and eminently deliverable, contribution towards the current housing land supply shortfall. It is considered that no adverse impacts of developing the site in the manner proposed will arise so as to outweigh the benefits of meeting future housing need. As such, the principle of residential development must be accepted in accordance with the NPPF.
- 5.11 Core Policies 1 and 2 do not preclude development within Small Villages and indeed Core Policy 2 specifically alludes to "*some very modest development may be appropriate at Small Villages, to respond to local needs and to contribute to the vitality of rural communities*" and therefore does not preclude development such as this.
- 5.12 The current housing shortfall requires a flexible planning approach, reducing the weight of these policies, engaging the presumption in favour of sustainable development and the tilted balance. Therefore, the proposed location, use and quantum of residential development at the site does accord with local and national planning policy.

- 5.13 The principle of development at this site, irrespective of its conflict with extant (and out of date) development plan policies, is firmly established. In such circumstances, the determination of this planning application should be focused on the site-specific considerations, on the basis that as a matter of principle, the development of the application site is accepted.
- 5.14 The conformity of the proposed development with the development plan, in this case the WCS, when read as a whole is considered below.

The Bishopstone Plan

- 5.15 As with all small villages, Bishopstone does not have a formal boundary. The Bishopstone Plan however indicates, in their view, the village extent as indicated in Figure 1 above, within which the proposed site sits.
- 5.16 The Plan states that *"...people agree that some infill housing would be acceptable as long as the character of the village is maintained; those houses should be for young people from the village and of a type that would be affordable to them"*. The plan goes on to say that *"infilling should only be allowed within the "built areas" as shown on the map in Appendix B"*. Appendix B is shown in Figure 3 above, within which the proposed site sits.
- 5.17 The Bishopstone Plan acknowledges that some development is required to ensure the vibrancy of the village and to ensure that it does not become a retirement community by providing homes for young families and the children of existing residents.
- 5.18 Material weight should be applied to the Bishopstone Plan's role in the decision-making process, and the proposals accord with the ideology of the Bishopstone Plan, infilling within an area outlined as an infill site, providing a mix of smaller homes in a range of types that will appeal to smaller families and downsizers with an element of much needed affordable housing.

Landscape Character

- 5.19 The Application Site is located within the Cranborne Chase National Landscape and as such paragraph 189 and 190 of the NPPF are of relevance to the determination of this application.
- 5.20 The NPPF is clear (paragraph 189) that 'great weight' should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscape, the latter being applicable in this case. This does not impose a blanket restriction on development within the National Landscape, rather it seeks to apply the highest level of protection in order to meet the objectives of conserving and enhancing landscape and scenic beauty.

- 5.21 Footnote 67 of the NPPF confirms that whether a proposal ‘constitutes’ major development is a matter for the decision taker and that this should be based on a consideration of the nature, scale and setting and whether the proposal could have significant adverse impact on the purpose of its designation. It is a matter of judgement and context.
- 5.22 Whilst this is for the decision taker it is pertinent to state that for the reasons of scale, nature and setting, the development proposals do not constitute major development for the reasons discussed in the paragraphs below and within this planning statement as a whole.
- 5.23 A *Landscape and Visual Impact Assessment* (LVIA) is submitted as part of this planning application. The LVIA assesses the existing landscape context, character and sensitivities of the Site. The proposed development has been designed to deliver a high-quality landscape-led pattern of development that responds appropriately to its physical setting and sensitivities.
- 5.24 It is acknowledged that there will inevitably be some adverse visual effects from the introduction of built form into currently undeveloped land. Great and careful regard has therefore been given to visual amenity and the landscape character of the area and its role within the Cranbourne Chase National Landscape during the design of the proposals.
- 5.25 It is important to note at this juncture that sites may differ in the extent to which they exhibit the special qualities of the National Landscape and that not all parts of the National Landscape are equal dependent on their context.
- 5.26 The proposals sit within the existing built-up area as defined in the Bishopstone plan, with development on two sides, and respect the existing character and form of the village. The proposed plans are considered a betterment of the existing “eyesore” as many residents described the site at the community consultation. It is acknowledged in the LVIA that *“Key mitigating factors are the site’s location within a designated “Built Area” as well as the local pattern of development already found along Broad Chalke Road.”*
- 5.27 A range of mitigating factors reduce the significance of these effects, notably: the siting of development in the context of existing settlement on either side; the inclusion of the BNG Buffer to the north; retention of the central ash trees ; sensitively-designed limited built form, including locally-characteristic materials and varied articulation, softening the appearance of built form in the landscape. As a result, visual effects will be limited.
- 5.28 It is acknowledged that the Cranbourne Chase National Landscape is also a Dark Skies reserve, and a lighting plan has been supplied to address external lighting impact.

- 5.29 There will be beneficial effects on landscape features including vegetation within the Site, owing to the range of structural vegetation being introduced including large areas of wildflower meadow. The landscape approach is set out through the Illustrative Landscape Masterplan (**Doc Ref: 24.1835 Land at Bishopstone-LVIA 30 Jan 26 P3**).
- 5.30 Pre-mitigation, the Overall Level of Effect of the proposed development is considered to be Major/Moderate – Moderate. As explained within the LVIA, the potential landscape sensitivities associated with the Site have been assessed in detail which, in turn, informs the overall strategy and design approach. Any landscape effects will be mitigated as far as possible, with the Overall Level of Landscape Effect being reduced to Moderate with the new planting helping enhance the setting of the overall development.
- 5.31 The LVIA concludes that:
- “As a result of the appraisal of landscape and visual effects, it has been determined that that the proposed development would not have an unacceptable adverse impact on the landscape resource or views and visual amenity. The proposed dwellings will be integrated into a designated ‘Built Area’ with a layout and density commensurate with other residential development within the village. Furthermore, despite the increase in built form, the proposed development will not be unduly prominent nor detract from the landscape resource or the area’s visual amenity. Taking account of the indicative landscape scheme and the enhancement recommendations coupled with the established character of the local area, the development can be undertaken so that the proposed residential development will integrate into the receiving landscape.”*
- “The proposed development will not be significantly detrimental to any of the key characteristics or descriptions of the site and the surrounding landscape as identified in this document. The proposed development can be undertaken in compliance with the relevant guidance and policies in the Cranborne Chase National Landscape Partnership Plan 2025–2030, the NPPF, the Wiltshire Core Strategy, and the emerging Wiltshire Local Plan..”*
- 5.32 The development will achieve at least a 10% Biodiversity Net Gain (BNG), in line with new national requirements, meaning the habitat value after development will be greater than the baseline. Landscaping plans include habitat creation (e.g. native tree and hedgerow planting, wildflower areas) to enhance local biodiversity. With the wildflower BNG buffer to the north, the proposals seek to further conserve and enhance the natural beauty of the site as required by the amended s.85 of CRow Act (**Section 85 of the Countryside and Rights of Way (CRow) Act 2000, as amended by the Levelling-up and Regeneration Act 2023**).

- 5.33 The proposed development is therefore considered to be consistent with the Cranborne Chase National Landscape Partnership Plan 2025–2030, the NPPF, the Wiltshire Core Strategy (WCS Core Policy 56), ensuring that the proposals do not have a harmful impact upon the landscape character and, through the delivery of appropriate mitigation and sensitive design, it ensures that the objectives of this policy are satisfied. In doing so, resulting in a development pattern that is also consistent with WCS Core Policy 57, by delivering a high-quality pattern of development that responds positively to its landscape setting.
- 5.34 Additionally, removing the cattle use stops the ongoing effluent pollution, improving soil and water quality. Overall, the site's environmental condition will improve, fulfilling the requirements of leaving the National Landscape's natural environment in an improved state.
- 5.35 Overall, the approach to landscape matters is consistent with the WCS and Section 15 of the NPPF.
- 5.36 Based on the above, there is not considered to be any conflict arising with CP51 (WCS) and accords with Paragraph 135 & 189 of the NPPF.

Residential Amenity

- 5.37 Whilst Residential Amenity is not defined in Planning Law, Core Policy 57 of the WCS states that proposals should have regard to: *"... the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)."* This is a widely accepted definition of residential amenity.
- 5.38 Core Policy 57 does not prevent development which affects neighbouring properties, but it does require development to have regard to neighbouring amenity, privacy and overlooking ensuring that existing occupiers would still have a high standard of amenity.
- 5.39 This is addressed through the proposals careful regard of separation distance, height, depth, mass, scale and bulk and location in relation to neighbouring properties, gardens and window positions. Adequate space is provided between dwellings, both neighbouring and within the development, ensuring adequate daylight and sunlight provision along with adequate privacy.
- 5.40 Plots 7 & 8 have been specifically orientated to ensure that there is no overlooking and where there are windows at first floor level these are hallway or bathroom windows which can be frosted.
- 5.41 It is therefore concluded that the proposals accord with CP57.

Accessibility and Transport

- 5.42 An objective of the WCS is to reduce the need to travel by private car, which WCS Core Policy 60 seeks to achieve by planning for developments in accessible locations and promoting sustainable transport alternatives to the use of the private car.
- 5.43 This application is supported by a *Transport Statement* (TS). The purpose of the TS is to quantify the impact of the development in highways and transport terms and to assess the impact the additional movements by all modes would have on the operation of the transport and highway network.
- 5.44 The TS shows that the existing use could generate between 14 and 18 two-way daily movements. The proposals would generate the proposal could generate 5 two-way movements during the morning peak hour period and 4 two-way movements during the evening peak hour period. The scheme would therefore generate 38 two-way daily movements.
- 5.45 Alongside the assessment on the highway network, the TS demonstrates how the proposed development supports sustainable movement patterns which reduces the reliance on private car use.
- 5.46 The TS summarises that:

"....application site is located within walking and cycling distance of local public transport connections. Bus stops are conveniently located within easy walking distance from the site, providing access to bus services to the surrounding area. It is evident that the application site is located in an accessible area with genuine opportunities for residents and visitors of the site to travel to/from the application site using sustainable modes of transport."

- 5.47 The Transport Statement concludes that:

"Having undertaken an analysis of the local highway network, it has been demonstrated that the development would not result in an unacceptable impact on highway safety, and the residual cumulative impacts on the road would not be severe. The proposal would lead to but a few vehicle movements on the local highway network. Additionally, the existing use generates slow and heavy vehicles, which this proposal will remove from the network. As a result, the traffic generated by the site will be minimal and have an insignificant impact when dispersed across the local network."

- 5.48 The Statement goes on to say that:

"It has been demonstrated that:

- There are genuine opportunities for residents and visitors to travel.*
- to/from the application site using sustainable modes of transport;*

- *The proposed site access would be safe and suitable to serve all users;*
- *The parking provision and internal road layout reflects current national*
- *and local guidance; and*
- *The local highway network can accommodate the traffic generated by the site during the peak hour periods without resulting in a severe residual cumulative impact on the network.”*

5.49 The proposals are in compliance with the objectives of Core Policy 60, Core Policy 61 and Core Policy 62.

5.50 The proposals are also consistent with the NPPF, with particular reference to paragraph 116 where it states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe. The TA clearly demonstrates that this is not the case for the development as proposed.

Pedestrian Connection

5.51 The development scheme includes a pedestrian connection from (and to) the Site to enable residents to safely exit the site and walk to the adjacent bus stop. This approach supports wider strategies for reducing the reliance on private car and encouraging more sustainable movement choice (WCS Core Policy 60).

Design and Layout

5.52 WCS Core Policy 57 requires a high standard of design from all new development, with the expectation that development will create a strong sense of place, drawing on the local context and being complementary to the locality. In addition, the NPPF recognises that good design is a key aspect of sustainable development.

5.53 The proposals subject to this application provide for 9 dwellings, set within a high quality built and natural environment which responds sensitively and positively to the site-specific constraints and opportunities. This demonstrated through the Site plan **(Doc Ref: PL-02-B)**.

5.54 It was important that the proposals kept the density of dwellings low to minimise the impact on the National Landscape and provide a mix of units that compliments the neighbouring residential developments whilst paying homage to the landscape and village character along with recognising village need.

5.55 The site is topographically interesting being on a slope, it was important therefore to work with the landscape to address privacy, overlooking, overshadowing etc. for both neighbouring dwellings and those within the site, whilst also paying heed to the views into and from the site.

- 5.56 The key drivers of the design stem from the landscape context of the site as well as the design and material choices being made to ensure that they fit with the local village vernacular, with choices such as flint and slate made with the aim of creating a quality well designed development on a prominent site in the village.
- 5.57 Full details of the design rationale are set out in the *Planning Support Document* (**Ref: DAS REV A_Planning Support Document_Whitlocks**) which provides a comprehensive assessment of the context of this site and how the proposals respond to its physical context, both in terms of its relationship to existing development.
- 5.58 It is clearly demonstrated within the *Planning Support Document* (**Ref: DAS REV A_Planning Support Document_Whitlocks**) that the proposed development supports the objectives of WCS Core Policy 57 and section 12 of the NPPF, by securing a high quality and sustainable pattern of development.
- 5.59 It is also relevant to add that it is acknowledged that the updated NPPF at paragraph 11(d) does set out that 'securing well-designed places' should be a consideration in the tilted balance exercise, with footnote 9 referencing design paragraph 135, which requires developments to (inter alia): 'add to the overall quality of the area' (a), 'are visually attractive as a result of good architecture, layout and appropriate and effective landscaping' (b); 'are sympathetic to local character and history, including the surrounding built environment and landscape setting' (c) '...maintain a strong sense of place' (d).

Drainage and Flood Risk

- 5.60 This application is supported by a *Flood Risk Assessment & Drainage Strategy* which confirms that the Application Site located entirely within Flood Zone 1 for surface water flooding i.e. at a low risk of such flooding.
- 5.61 The site sits above the flood plain of the River Ebbles, within Flood Zone 1, and would appear to be underlain by chalk. Given the expectation of good ground infiltration, it is proposed to dispose of surface water directly to ground via soakaways and porous paving. These would be sized to accommodate a 1 in 100-year storm with an additional allowance of 45% for climate change.
- 5.62 Overall Flood Risk from all sources has been assessed as Low Risk in the accompanying Flood Risk Assessment.
- 5.63 Foul flows are proposed to be treated by a package treatment plant that would then discharge to a drainage field. It is proposed to install a package treatment plant as no adopted foul sewers are available to serve this development. The plant would be located off-site just to the south of the public highway. Treated flows will discharge to ground via a drainage field. Percolation & BRE testing is underway, and results will be provided once available.

- 5.64 The drainage strategy has been designed to meet the requirements set out in WC's 'Drainage and Betterment Strategy' document. The proposals are therefore in line with the NPPF and CP67.

Ecology

- 5.65 This application is supported by an *Ecological Appraisal* which describes the current ecological interests within and around the site, which have been assessed through standard desk and field-based investigations. It then considers the potential ecological impacts and opportunities for ecological enhancement and identifies the necessary additional measures to avoid, mitigate or provide compensation impacts, and the mechanisms for secure such measures.
- 5.66 As referenced in the *Ecological Appraisal*, although beyond 2km, three important international sites are located within 20km which are vulnerable to nutrient inputs and recreational pressure:
- River Avon SAC; approximately 4km to the north
 - The New Forest SPA, SAC and Ramsar; approximately 13km to the south-east
 - Salisbury Plain SPA; approximately 18km to the north
 - In addition, there is one SAC designated for bats within 30km of the application site. Mottisfont Bats SAC is 23km to the east and supports an important population of the rare barbastelle *Barbastella barbastellus*. It is one of only six known maternity sites in the UK (2002 data) and the only one in Hampshire.
- 5.67 The impact on the River Avon SAC has been addressed through the submitted *NNAMS* and *Shadow HRA*.
- 5.68 The baseline ecological investigations which informed the *Ecological Appraisal* include a desk study, habitat survey, and further detailed (Phase 2) surveys relating to reptiles.
- 5.69 The *Ecological Appraisal* concludes that:
- "The application site was comprised of relatively species-poor cropland, grassland, woodland and scrub habitat, which are common and widespread habitat types likely abundant in the local area. In themselves, the habitats have value at the site level only, however, it is the potential secondary function of supporting protected species that may elevate the ecological value. The proposed development may adversely impact upon badger, bats, nesting birds and reptiles."*

The application site lies within impact zones for internationally designated sites regarding nutrient pollution and recreational pressure as a result of increases in population as a result of new residential development. The development will be required to demonstrate Nutrient Neutrality and mitigate recreational increases, likely through a financial contribution.

Updating survey for badger setts should be carried out prior to commencement of construction due to the presence of badgers in the area. Precautionary working methods for badger, reptiles and nesting birds should be adopted during site clearance works.

A lighting strategy should be designed to minimise lighting disturbance from the proposed development and to ensure no additional lighting onto boundary habitats.

Biodiversity net gain applies to this project and a 10% net gain is required. Areas within the red line boundary have been designed specifically for habitat creation and enhancement in order to address this statutory requirement.

The proposed development presents the opportunity to enhance the application site for species by providing additional bat roosting spaces and specialist bird nesting spaces."

- 5.70 Following the recommendations given in the Ecological Appraisal, targeted reptile surveys were carried out within the application sit. The report concludes that:

"During the survey, no reptiles were found. These results rule out the likelihood of a high population of reptiles present, however due to the ideal habitats in the surrounding areas, the site still has potential to support occasional foraging reptiles within the edges of grassland fields. Habitats suitable for foraging reptiles are present, generally around the edges of the fields. The scrub habitats provide suitable breeding and hibernating habitats.

As these habitats are present, any works proposed may injure or kill any individual reptiles that may be present on site at the time of works. Therefore, to protect reptiles which may be present at the time of works, a Precautionary Method of Working of vegetation clearance should be followed.

Habitat connectivity should not be destroyed therefore vegetation loss on the northern boundary should be minimized and the woodland habitat retained. A hibernaculum should be created to relocate any reptiles which may be present during works, and this should be retained post works."

- 5.71 A Lighting Strategy has been submitted as part of this application to ensure lighting disturbance to bats is minimised from the proposed development and to ensure that no additional lighting onto boundary habitats as well as respecting the Dark Sky Reserve.

- 5.72 Nutrient Neutrality & Biodiversity Net Gain are addressed separately below.
- 5.73 The decision maker is invited to apply relevant conditions to the application to address the points raised by the Ecologists within the Ecology Appraisal and the Reptile Report as well as include a condition for Swift Boxes.
- 5.74 It is therefore concluded that the site is in accordance with Relevant Legislation as outlined in the Ecological Appraisal and Planning Policy including the NPPF and Core Policy 50 & 69 of the WCS.

Biodiversity Net Gain (BNG)

- 5.75 As of 12 February 2024, BNG is a mandatory requirement and a BNG Assessment has been prepared which objectively measures the net biodiversity impacts of the proposed development. The BNG assessment has been undertaken using the Statutory Biodiversity Metric (last updated 12 February 2024).
- 5.76 Informed by landscape proposals (**Doc Ref: 24.1835 Land at Bishopstone-LVIA 30 Jan 26 P3**), assumptions can be made regarding the habitats present post-development, made up of habitats retained in their current state (with no change), habitats retained and enhanced, and newly created habitats.
- 5.77 The biodiversity value of all newly created and enhanced habitats and their contribution to BNG is set out within the Biodiversity Net Gain Assessment. The overall BNG position associated with the proposed development is summarised as follows:

Table 4: BNG Calculation		
	Habitat Units	Hedgerow Units
Total Net Unit Change	0.99	0.5
Total Net % Change	24.95%	0 baseline units - % cannot be calculated

- 5.78 It is therefore clear that the proposed development is capable of providing for substantial net gains in BNG, in excess of the mandatory requirements. Set against extant development plan policies, in this case Core Policy 50, where appropriate measures should be secured to ensure no net loss of biodiversity, the proposal subject to this application are entirely consistent with the objectives of this policy and exceed, by some considerable margin, the overall biodiversity value post development.

- 5.79 It is noted that through the emerging Local Plan (draft Policy 89 – Biodiversity net gain) requires development to achieve a minimum of 20% BNG. This represents a draft policy that is subject to considerable objection through the Local Plan process and is yet to be subject to the scrutiny of the Examination process. It remains a draft policy and therefore has limited weight in the determination of this planning application.

Shadow HRA

- 5.80 The sHRA considers the potential impacts of the proposed development on European sites located within the project's Zone of Influence (Zoi). It considers the potential for Likely Significant Effects (LSE) on European Sites to arise as a result of the proposed development.
- 5.81 Taking into account the Zoi that has been adopted for assessment, the sHRA has considered impacts on the following European site:
- River Avon SAC;
- 5.82 The potential for Likely Significant Effects, through the HRA screening process cannot be ruled out in respect of the following for the River Avon SAC in terms of the recreational and water quality impacts and for the New Internationally Protected Sites Complex, these potential effects relate to the recreational impacts.
- 5.83 These impacts are assessed within Stage 2 of the HRA. All other impacts on European Sites have been screened out, for reasons set out in the sHRA.
- 5.84 Current nutrient levels in the River Avon SAC suggest that any net increase in phosphate from new development is likely to have an adverse effect on the integrity of this SAC and there it is necessary to demonstrate that the proposed development can achieve nutrient neutrality.
- 5.85 A nutrient neutrality budget for the proposed development has been calculated, using Natural England's Nutrient Budget Calculator which predicts an annual phosphorus export of 1.12kg TP/year.
- 5.86 To mitigate this impact, the Applicant proposes to deal with all Foul Waste through a Package Treatment plant along with land use net change.
- 5.87 A Nutrient Neutrality Mitigation Strategy has been submitted with this application which shows that the proposed development will generate -0.07 kg TP/yr and is therefore nutrient neutral. It can therefore be concluded that the proposed development will not prevent the Conservation Objectives of the River Avon SAC from being achieved.



- 5.88 In doing so, ensuring that no adverse effects on the integrity of the River Avon would occur from water quality impacts and that the proposals are consistent with WCS Core Policy 50 and Section 15 of the NPPF.

Summary

- 5.89 As demonstrated within this section, and supporting documents, the proposed development is consistent with the policy requirements set out in the WCS and the NPPF
- 5.90 Where a conflict does exist with development plan policies this relates to the overarching spatial strategy and the distribution of growth requirements identified within the WCS. Such policies do not reflect or provide for up-to-date housing needs and as such they are policies which are out of date.
- 5.91 When read as a whole the proposals subject to this application are consistent with the development plan.

6. Affordable Housing Statement

- 6.1 WCS Core Policy 43 requires sites of five or more dwellings to make provision for at least 30% or 40% affordable housing, depending on the 'affordable housing zone' development is located within.
- 6.2 The Application Site is located within the 40% affordable housing zone and therefore the proposed development of 9 dwellings requires a minimum of 4 dwellings (rounded up) to be provided. The proposals subject to this planning application provide a policy compliant level of affordable housing.
- 6.3 WCS Core Policy 43 confirms that affordable housing tenure will be negotiated on a site-by-site basis to reflect the nature of the development and local needs. The proposed affordable housing units are 3, 4, 5, & 6 with tenure to be agreed with the Affordable Housing Officer.
- 6.4 Working with a local affordable housing provider from early outset was important to the scheme to meet the requirements of The Trust to ensure that, where possible the affordable units were made available to the local community in the first instance and to help to address the myriad concerns at the Community Consultation that the units were made available for local people in the local community.
- 6.5 Affordable housing discussions have been held with Whitehorse Housing a local Wiltshire Affordable Housing provider, who have expressed interest in taking on the Affordable element.

Delivery of Affordable Housing

- 6.6 The precise delivery schedule for affordable housing will be confirmed through agreement with WC as part of the S106 process, including appropriate triggers to ensure the timely delivery of affordable housing.

7. Draft Heads of Terms

- 7.1 In accordance with the Wiltshire Council Community Infrastructure Levy (CIL) Charging Schedule (May 2015), the proposed development will be liable for CIL.
- 7.2 WCS Core Policy 3 requires that all new development provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposed development.
- 7.3 The proposed development will deliver 9 dwellings and this will include affordable housing at the policy compliant level of 40% (4 units).
- 7.4 The applicant, The Clumber Trustee Co Ltd and Quay Hill Trustee Co Ltd, are willing to enter into negotiations with WC to agree planning obligations, to be secured via a Section 106 agreement. Such obligations will need to satisfy the relevant tests, specifically they must be:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 7.5 At this stage, the following planning obligations are considered likely to be relevant to the proposed development.
- On-site Affordable Housing provision (40%),
 - Financial contributions towards education provision.
 - Financial contribution towards Public Rights of way
 - Financial contribution towards waste
 - Financial contribution to Open Space, Play and Sports Pitches.
- 7.6 The consistency of such obligations with the Regulation 122 tests and paragraph 58 of the NPPF will need to be established as part of the negotiations and discussions between relevant parties as planning obligations are finalised.

8. Planning Balance and Conclusion

- 8.1 The proposals for the *Detailed Planning application for the Erection of 9no. dwellings including 4 Affordable Homes with associated infrastructure* are supported by a suite of supporting documents, technical reports and surveys, which demonstrate that the proposals respond positively and sensitively to site specific constraints and opportunities, resulting in high quality and sustainable pattern of development.
- 8.2 Section 5 of this Planning Statement considers the proposals against the relevant policies of the Development Plan, in this case the WCS and The Bishopstone Plan (which carries some **limited weight**). In doing so, it demonstrates that when read as a whole, the proposed development is in accordance with such policies. Where there is a conflict, this relates to the location of the application site, outside the settlement boundaries, and the fact that the Site is not identified as an allocation within the adopted development plan, the WCS.
- 8.3 The development plan, specifically the WCS, provides the strategic planning framework for the Plan period up to 2026, it is therefore a document which was prepared in response to a level of housing need that no longer reflects the up-to-date Local Housing Need for Wiltshire. The replacement plan, the Local Plan Review, has been submitted for Examination and has found to be unsound at this stage with matters for resolution. Whilst it is capable of attracting some weight in the decision-making process, this weight must be reduced until such time that the Examination process has concluded. Pursuant to paragraph 49 of the NPPF, and the level of unresolved objections, only **limited weight** can be given to the emerging Local Plan at this time.
- 8.4 The Spatial Strategy (CP1) and Development Strategy (CP2) do not provide an up-to-date policy framework for the delivery of housing to meet current need. As such, these policies must be considered out of date and the weight attributed to any conflict with these policies reduced, such that in this case, only limited weight should be given to any conflict.
- 8.5 It is the accepted position of WC that it cannot demonstrate a sufficient supply of deliverable sites to meet current housing need. The current position is that there is a **2.42yrs** supply of housing which represents a significant and serious shortfall in housing delivery.
- 8.6 The consequence is that paragraph 11d of the December 2024 NPPF is engaged and the presumption in favour of sustainable development (the 'tilted balance') is triggered. For decision-taking this means that planning permission should be granted unless the application of policies set out in the Framework (as per Footnote 7) provides a strong reason for refusing development, or where any adverse impacts of granting planning permission would **significantly** and **demonstrably** outweigh the benefits.

8.7 Footnote 7 of the NPPF refers to the following.

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”

- 8.8 Footnote 7 is engaged where development would conflict with policies relating to habitats sites protected under the Habitats Regulations and the National Landscape. In this case, the proposed development is within the River Avon (Hampshire Avon) catchment and the Cranbourne Chase National Landscape. This is discussed further in the accompany Shadow HRA and the LVIA.
- 8.9 As Footnote 7 is engaged it is therefore required to demonstrate that the proposal will not result in an adverse effect on the integrity of the River Avon SAC or where it does provide appropriate mitigation and the Cranbourne Chase National Landscape.
- 8.10 As discussed in paragraphs 5.113 onwards relating to the Shadow HRA, appropriate mitigation has been provided through the delivery of a Package Treatment plant for Foul waste created by the proposals
- 8.11 It can therefore be concluded that that the proposed development will not result in an adverse effect on the integrity of the River Avon SAC, the relevant Footnote 7 constraints are appropriately addressed and do not provide a clear reason for refusal. In these circumstances, the presumption in favour of sustainable development applies and the tilted balance under paragraph 11(d) of the Framework is therefore engaged.
- 8.12 Indeed, it is important to note there was no objection to the NNAMS & sHRA during the process of withdrawn Application (**Ref: PL/2025/03116**).
- 8.13 The NPPF is clear (paragraph 189) that ‘great weight’ should be given to conserving and enhancing landscape and scenic beauty in National Parks however this does not impose a blanket restriction on development within the National Landscape, rather it seeks to apply the highest level of protection in order to meet the objectives of conserving and enhancing landscape and scenic beauty.
- 8.14 Footnote 67 of the NPPF confirms that whether a proposal ‘constitutes’ major development is a matter for the decision taker it can be concluded that for the reasons of scale, nature and setting the development proposals do not constitute major development for the reasons discussed above

- 8.15 The NPPF (paragraph 212) confirms that when considering the impact of a proposed development on the significance of a National Landscape, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 8.16 Accordingly, when the benefits of the proposed development are considered, those policies within the framework relating to National Landscape interest (as outlined in footnote 7), do not provide a strong reason to refuse or resist the application. Therefore, the tilted balance, in this context can be applied.
- 8.17 It therefore follows that the decision-making process must undertake the planning balance and assesses whether the adverse impacts of granting planning permission would **significantly** and **demonstrably** outweigh the benefits of the proposed development.
- 8.18 This Planning Statement demonstrates that the proposed development is consistent with the development plan, specifically the WCS when it is read as a whole. Where there is conflict, this relates to spatial distribution policies which must be considered out of date, the reasons for this set out within this statement. Therefore, any conflict with extant development plan policies must only attract limited weight.
- 8.19 In terms of the benefits associated with the proposed development, the socio-economic benefits of new housing are becoming increasingly important during the ongoing housing and cost of living crisis. In its 30 July 2024 letter to housing industry stakeholders, the Ministry of Housing, Communities and Local Government (MHCLG) stated that the only route to improving national prosperity, and the living standards of working people, is through sustained economic growth, and emphasised that building more homes is fundamental to unlocking this growth.
- 8.20 The application proposals will deliver economic, social and environmental benefits as follows:

Economic Benefits

- 8.21 Paragraph 85 of the NPPF confirms that ‘significant weight’ should be placed on the need to support economic growth. This reflects the fact that the economic contribution that house building makes to the UK economy has been shown to be significant and wide-ranging. It contributes directly to gross domestic product through the economic output that it creates, while also supporting a significant employment base and contributing to public finances through the tax revenues that it generates. More broadly, house building activity also plays a key role in stimulating further demand and economic activity through its extensive supply chains and networks, which in turn generates additional output, employment, spending and tax contributions.²
- 8.22 One in 20 jobs in England were in the construction sector in 2021, equating to approximately 1.3 million jobs³. These include workers involved in building and renovating homes, as well as supporting infrastructure. Jobs in construction include entry-level apprenticeships and traineeships, as well as roles that require specialist skills and management experience. House building also plays an important role in generating economic output. In 2023, house building contributed £53.3 billion of economic output to national economy, the majority of which (87%) was generated by private sector housing.⁴
- 8.23 The proposed development will aid in supporting local businesses and services, supporting construction jobs and increased workforce in a location which has a strong employment base. Whilst limited in time, the development will generate economic benefits through the construction period. Economic benefits will also be associated with the future spending of occupants of the development in local shops and services and council tax receipts, alongside the Community Infrastructure Levy.

Social Benefits

- 8.24 The proposed development will provide for 9 new homes, including 40% affordable properties in a sustainable location that has access to a range of services and facilities. The proposals provide for a range of house types, sizes and tenures set within a high quality natural and built environment, infilling between an existing cluster of built development.

² Lichfields, 2024, *The Economic Footprint of Home Building in England and Wales*

³ Homes England, 2023, *Fact Sheet 8: The Economic, social and environmental benefits of new homes.*

⁴ Lichfields, 2024, *The Economic Footprint of Home Building in England and Wales*

- 8.25 WC cannot demonstrate a 5 Year Land supply. The proposals provide a modest but meaningful windfall contribution to housing supply at a time when supply is failing to meet demand. This includes delivering smaller market homes that align with local needs, diversifying a housing stock currently dominated by large homes.
- 8.26 The proposals deliver Affordable Housing, securing 40% affordable homes on-site, helping local people access housing.
- 8.27 Government Statistics **Live Table 600: Number of households on local authority housing registers**⁵ shows that Wiltshire have 1607 people on the housing register in 2025.
- 8.28 Given the lack of affordable housing delivery caused by lack of housing supply the contribution of 4 affordable homes is a significant benefit in the public interest.
- 8.29 The delivery of new housing represents a significant benefit. The consequence of not building enough homes is that buying a home has become increasingly unaffordable, as the cost of a home is increasing more quickly than earnings. Homes England⁶ states that in 2002 the median salary in England was £20,739 and the median house price was £102,000, equating to an affordability ratio of 4.92. By 2022, the median salary was £33,208 and the median house price was £275,000, equating to an affordability ratio of 8.28.
- 8.30 The average housing price in Wiltshire (October 2025) is £328,000, similar to October 2024 but an increase of 4.6% from December 2023. Average monthly private rent in Wiltshire was £1052 in November 2025, an increase of 8.1% from £973 in November 2024. The average price paid by first-time buyers in Wiltshire was £264,000 in October 2025, an increase of 5.5% from December 2023.⁷
- 8.31 The increasing cost of housing represents a significant barrier to home ownership and with costs raising in Wiltshire, from prices which are already above the national average, the benefits associated with housing delivery are considered to be significant.
- 8.32 This should also be considered in the context of a significant housing land supply shortfall, with supply is equal to just 2.42yrs. The proposed development will provide for a modest level of market and affordable housing and as a detailed planning application, it is capable of making an important contribution to housing delivery in the short term.

⁵ <https://share.google/IHBdhBoOaZiLs2OuN>

⁶ Homes England, 2023: *Fact Sheet 1: The need for homes*.

⁷ <https://www.ons.gov.uk/visualisations/housingpriceslocal/E06000054/>

Environmental Benefits

- 8.33 The environmental benefits associated with the proposed development are considered to be significant both in terms of physical on-site provision but also in the wider context of delivering sustainable patterns of development.
- 8.34 The site is recognised as being in a sustainable location, with a range of services and facilities accessible by means other than the private car to serve day to day needs. This includes employment, education and leisure/recreation. This is achieved by access to existing local bus service provision with pedestrian connection provided to safely facilitate access to the bus.
- 8.35 The proposed development maximises opportunities for low or zero carbon efficiencies, through the design of new homes (fabric first) alongside the inclusion of solar PV and Air Source Heat Pumps, contributing to significant reductions in the carbon emissions associated with this development. The effects of climate change are taken into account in the proposed drainage strategy which will ensure that the proposals do not increase the risk of flood elsewhere through the use of appropriate Sustainable Urban Drainage techniques.
- 8.36 The proposals also support significant enhancements to the overall biodiversity value of the site, in excess of the mandatory requirements. Contributions to off-site mitigation measures to address the potential impacts of the proposed development on designated European Sites, in particular phosphorus load, ensures that the proposed development does not have any adverse effects on the integrity of European sites.
- 8.37 The proposals are set within a high-quality landscape setting with access to the wider open countryside supporting healthy living and protects the amenity of existing and new residents.

Conclusion

- 8.38 In conclusion, the application accords with the Development Plan when read as a whole and any conflict identified, in this case the location of the application site outside the currently defined settlement limits, must be considered in the context of the tilted balance/presumption in favour of sustainable development.
- 8.39 Pursuant to the requirements of the NPPF, the determination of this planning application must be undertaken by applying the planning balances and only refused where identified harm would significantly and demonstrably outweigh the benefits.



- 8.40 This Planning Statement, when read alongside the suite of supporting documents, demonstrates that the proposed development represents a sustainable pattern of development that is in broad compliance with the Development Plan, meets the Exceptional Circumstances Tests outlined in the NPPF along with Footnote 7 of Paragraph 11d thereby allowing the Tilted Balance to be engaged. Moreover, any harm resulting from the development, does not met the threshold that would justify a refusal.
- 8.41 Accordingly, it is respectfully concluded that there is a compelling and justifiable case for planning permission to be granted.



APPENDIX 1

SITE LOCATION PLAN

P L A N N I N G

This drawing is copyright and the property of DMWA Ltd Chartered Architects. It may not be copied reproduced or altered in any way without their written authority.

This drawing is for planning purposes only.

All dimensions to be checked on site and any discrepancies reported to the Architect immediately. All structural and specialist elements/components/details, including glazing, are to be approved by the Structural Engineer or Specialist Contractor.

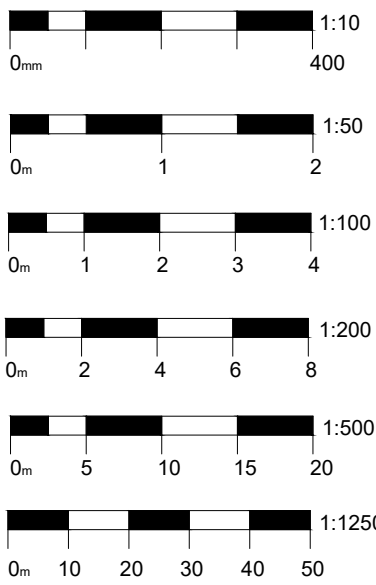
DESIGNERS RISK ASSESSMENT:
HEALTH AND SAFETY
THE CONSTRUCTION DESIGN AND MANAGEMENT REGULATIONS 2015
Building Products and Construction Execution Hazards

Common/everyday hazards associated with Building Products and Construction processes are not listed below and will be assumed to be controlled by the Principal Contractor following good safety, management and site practice procedures.

The proposed works are designed on a well established method of construction, which can be carried out by a competent contractor. However, should the contractor find any area of concern he must inform the designer immediately in order that appropriate action can be taken.

THESE DRAWINGS ARE FOR PLANNING PURPOSES ONLY.

Structures to be removed



B	Highways/Landscape updates	28.01.26
A	Highways/Landscape updates	26.01.26
Rev	Comment	Date

Project: New Dwellings
Land at Bishopstone,
Salisbury, Wiltshire

Client: Cherrington Planning

Drawing Title: Location & Block Plans

Job No: 250821
Drawn: RM | NH
Date: 04.02.2026
Scale: as indicated @ A1

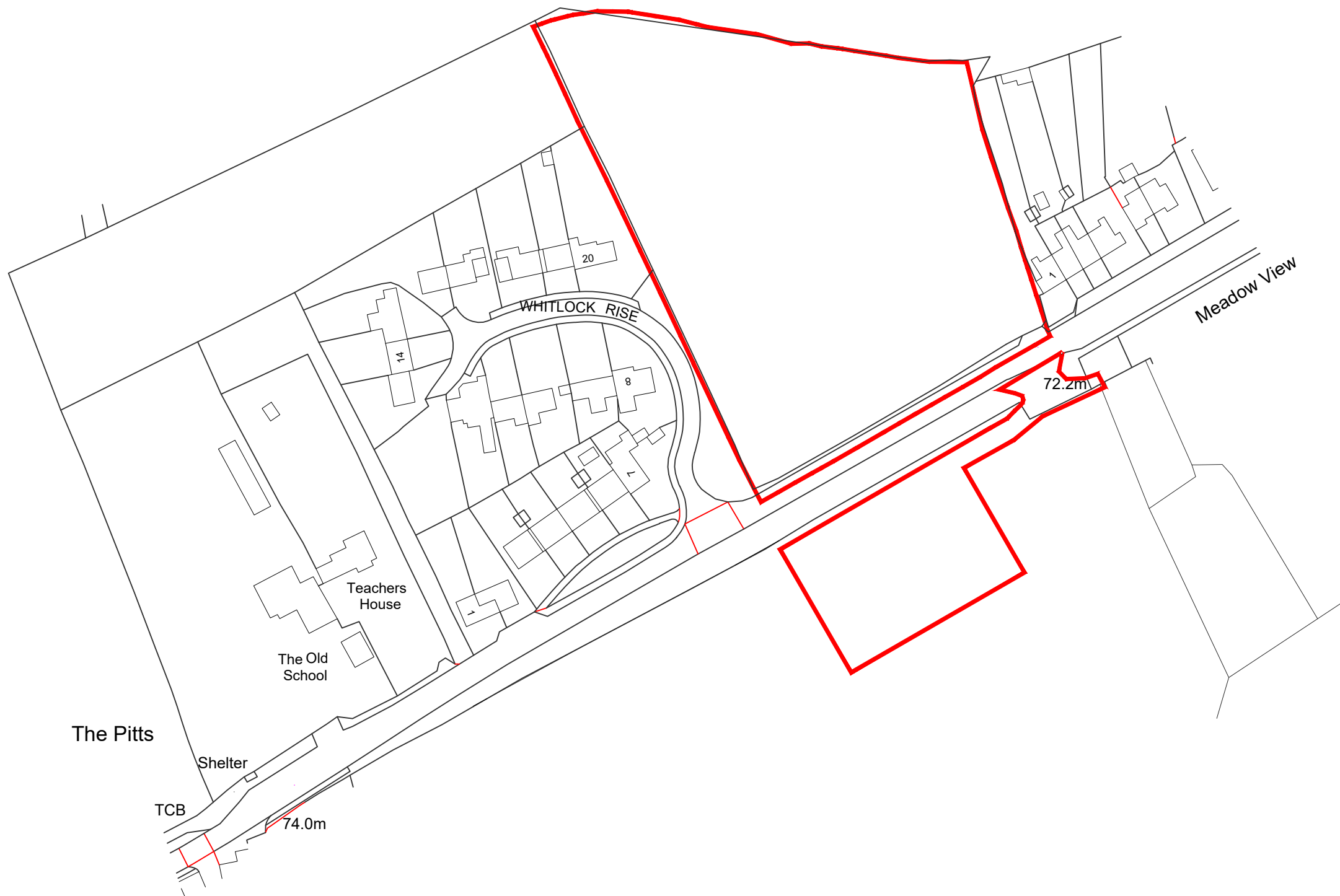
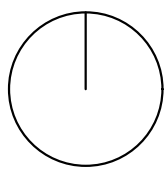
Drawing No: PL01

Rev: B

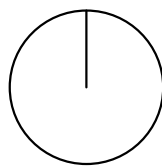
DMW
architects

46a East St, Wimborne, Dorset, BH21 1DX
01202 884024 www.dmwa.co.uk

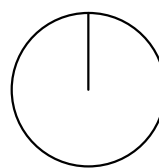
Location Plan
1:1250



EXISTING Site Block Plan
1:500



PROPOSED Site Block Plan
1:500





APPENDIX 2

**Inspectors' post Stage 2 hearings Letter 22 December
2025**

Examination of the Wiltshire Local Plan Review

Inspectors: Philip Mileham BA (Hons) MA MRTPI
Gareth Wildgoose BSc (Hons) MSc MRTPI

Programme Officer: Ian Kemp
Email: ian@localplanservices.co.uk

22 December 2025

Dear Mrs Clampitt-Dix,

Wiltshire Local Plan examination – Inspectors’ post Stage 2 hearings letter

1. Further to the hearing sessions held on 11-13 November 2025 and our post hearings letter sent on 17 November 2025, we are now writing to you to set out our initial views on the next steps of the Wiltshire Local Plan (the Plan) Examination. In summary, having had regard to the written statements received in response to our Matters, Issues and Questions and the subsequent discussions in the hearing sessions to date, we have identified several significant issues in terms of the Plan as submitted which we go on to set out in detail in this letter.
2. We are satisfied at this stage that there is sufficient prospect that the existing legal compliance and soundness deficiencies we have identified could be overcome. This is, however, subject to the Council outlining an achievable timetable for the preparation and submission of additional evidence that would not unreasonably delay the progress of the Examination. The timetable should be provided to us by not later than **5pm on Friday 30 January 2026** and should include provision for monthly progress updates. To assist with the preparation of the timetable, we set out in this letter the further work which we consider to be necessary at this stage to overcome the shortcomings that we have identified so far.
3. In reaching our initial conclusions, we have considered all evidence submitted and representations made relating to the Plan to date, including the written statements and oral contributions at the hearing sessions. Our overall conclusions on soundness and legal compliance will be given in the Final Report, which will be produced taking into account all stages of the Examination. As such, any views expressed in this note are preliminary and may alter in the light of any further evidence that emerges. This includes as part of any subsequent consultation process and any necessary work on the sustainability appraisal (SA) or habitats regulations assessment (HRA). It therefore follows that the views expressed in this letter are without prejudice to the conclusions of our Final Report.

Initial Views and Required Actions

Housing Need and the Housing Requirement

4. As submitted, the housing requirement is 36,738 dwellings over a plan period of 2020 to 2038. This is based on a local housing need calculation (LHN) of 2,041 homes per year. However, the base date of that calculation was 1 April 2022 and more recent Office for National Statistics (ONS) workplace affordability ratios have since been published.
5. The Council has referred to the Planning Practice Guidance (PPG) which advises that the LHN calculated using the standard method may be relied upon for two years from submission of the Plan. However, it is evident that the LHN calculation informing the Plan was already more than two years old when the Plan was submitted on 28 November 2024. The PPG is clear that the LHN calculation should be kept under review and revised where appropriate.
6. It follows that we request the Council to rebase the Plan period to 1 April 2023 to match the date of the median workplace-based affordability ratios (at the time of the Plan's submission). The Council should then recalculate the LHN for the Plan period. In doing so, the housing requirement may also need to be recalculated. If the Plan period were to be extended (see later paragraphs) this would likely result in a significantly higher number of homes to be delivered. This is evident even before any detailed testing of the housing supply and would have significant implications for the examination going forward.

Stepped Housing Requirement / Distribution of Development

7. Turning to the proposal to include a stepped housing requirement in the Plan as submitted, we consider that it is neither positively prepared nor justified. Whilst we note that the HRA indicates that a stepped trajectory should be considered, no clear evidence has been provided to justify at what level the step might be set at or its duration. Furthermore, the level of the step does not appear to have been subject to SA. Evidence was also provided during the hearings that the step was lower than current rates of housing delivery in the County. We are therefore concerned that it is not justified and would serve to unnecessarily delay meeting identified housing needs. In reaching this view, we note that there has not been a significant change in the level of the proposed housing requirement in the Plan when annualised and compared with the Wiltshire Core Strategy (document DP/01). Moreover, the housing trajectory provided in the submitted Plan does not seemingly correspond with a reliance upon strategic sites that would have phased delivery, nor is a majority of housing to be delivered later in the Plan period.
8. The approach pursued is instead influenced by rigidly following a distribution of development between the four Housing Market Areas (HMAs) informed by the Wiltshire Local Housing Need Assessment Update Volume One (document

SD/21). In doing so, the strategy is derived from nutrient neutrality constraints in the HRA (document SD/65) which affects the short-term deliverability of some sites in the Salisbury HMA in advance of upgrades to existing wastewater treatment works. However, in pursuing that strategy, there has been insufficient consideration of alternative distributions of development between the four HMAs which could have supported a much higher rate of housing delivery over the Plan period. This includes the alternative of allocating additional sites in HMAs other than Salisbury to provide sufficient deliverable sites in Wiltshire upon adoption and throughout the Plan period. It is necessary to assess those alternatives, given that they have the potential to be a realistic means of meeting identified housing needs in the early years of the Plan period.

9. Further work is therefore required to consider a range of alternative distributions between the four HMAs to ensure that housing needs can be met in the earlier parts of the Plan period. This should be informed by updates to the SA, which should consider a range of reasonable alternatives.

Proposed Salisbury Area New Community

10. The hearing sessions confirmed our earlier concerns (see document ID1) that there is no substantive evidence to justify the proposed search area for a new community, or the related approach in Policy 21 and the Key Diagram. This is also reflected in the SA Annex 3 (document CD/03U) which provides very little detail on how Policy 21 meets SA objectives. There is also insufficient evidence to inform the HRA conclusion of no likely significant effect on European sites. The latter finding is inconsistent with the Plan, which expects around 300 homes from the new community. In that regard, we do note that there is no evidence of a reasonable prospect that any homes from this new community could realistically be delivered within the Plan period as submitted.
11. Setting aside the inconsistency between the HRA and the Plan, the intention of Policy 21 to confirm the new community only through a future review suggests it is not currently supported by sufficient evidence. The Plan also conflicts with paragraph 22 of the NPPF, which requires that where large-scale developments (such as new settlements or significant extensions to existing villages and towns) form part of the strategy for the area, that policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery. In addition, the evidence provided does not adequately show the likely nature or scale of development likely to come forward, meaning the Plan cannot be modified to meet this requirement.
12. In reaching the above view, it is appreciated that the delivery of large-scale developments may need to extend beyond an individual plan period and the associated infrastructure requirements may not be capable of being identified fully at the outset. However, when taking account of the shortcomings of the SA assessment and the lack of detailed HRA

assessment, the Plan's approach is not justified nor consistent with national policy insofar as seeking to establish the principle for the strategic distribution of development beyond the Plan period and deferring the detail to a future Plan review.

13. We therefore consider that the inclusion of the proposed Salisbury area new community is not supported by sufficient evidence and is unsound. Having considered the extent of work that would likely be required to justify its inclusion in the Plan, we consider that it would not be achievable in a reasonable timescale during this Examination. Accordingly, the proposed Salisbury area new community should be removed from the Plan.

Broad Locations

14. The NPPF paragraph 68 b) allows for the identification of a supply of land for homes for years 6-10 and where possible for years 11-15 years of the Plan, to include broad locations for growth. NPPF paragraph 23, however, indicates that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. In that context, we appreciate that broad locations by their very nature often have a degree of ambiguity in terms of the precise location, scale of development, infrastructure requirements and delivery timescales. Nonetheless, the approach of the Plan to the proposed broad locations still falls considerably short of the expectations of the NPPF. The broad locations have not been identified on the Key Diagram, and need to be more specific in terms of the extent of growth that is expected to be brought forward/required during the Plan period.
15. The lack of certainty regarding the intended broad locations in Chippenham, Melksham and Trowbridge is exacerbated by the approach in Policy 3 and its supporting text which relies on further Development Plan Documents (DPDs) to assist in delivering the strategic objectives of the Plan. As such, there is insufficient evidence to demonstrate that there is a reasonable prospect that the proposed broad locations can be developed within the timescales envisaged. Therefore, we consider there are similar shortcomings to Policy 21 in terms of the demonstration of consideration of alternative approaches to the distribution of development and other locations as described above.
16. It follows that the Council are requested to reassess the inclusion of the broad locations in Chippenham, Melksham and Trowbridge. This should be undertaken as part of the additional work required relating to the distribution of development across the plan area, including revisiting the site selection process and updates to the SA and HRA. It should also include consideration and assessment of reasonable alternatives such as the identification of additional specific allocations in each of those settlements or elsewhere in Wiltshire. Following that process, if the Council was to find that one or more of the broad locations are still required, this should be fully justified in evidence including the contribution required from each along with some further details on their location and extent. The justification should also

include proposed main modifications to the Key Diagram and Policy 3 of the Plan to provide a positively prepared and effective strategy that would enable any broad location(s) to be brought forward by the end of a Plan period (without reliance solely on the preparation of a future DPD).

Reserve Sites

17. We also have concerns about the justification and effectiveness of the approach taken in Policy 3 of the Plan as submitted to reserve sites. This is particularly notable given that their limited scale is likely to offer little contingency for the circumstances of housing land supply shortfall identified in the Plan. There is also concern that the trigger for the release of the reserve sites which relies upon the calculation of land supply on an HMA basis is not justified. No clear evidence has been provided why the reserve sites were not proposed to be allocated to simply provide a further land supply buffer.
18. The Council is, therefore, requested to revisit the status of the proposed reserve sites as part of the additional work required on the site selection process and updates to the SA and HRA. This should include consideration of whether they should be allocated immediately.

Employment Need and Delivering the Employment Requirement

19. To reflect the changes to the housing requirement and those that may be required to the Plan period (see later paragraphs), further work will also be required to recalculate the employment land requirement. As part of that process, the Council should provide additional justification for the approach pursued in the Plan. This should include further assessment and explanation of any intended balance between homes and jobs being planned for in each of Wiltshire's Functional Economic Market Areas (FEMAs). It should also set out the extent to which supply and demand for the numbers of workers and sectoral priorities have influenced the distribution of proposed allocations in the Plan.
20. Notwithstanding the above, there are other evident shortcomings in the approach of the Plan to additional employment land in terms of soundness that will also need to be addressed. A significant concern is the approach of Policy 64 which provides support for the principle of development of unallocated sites within or adjacent to Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages where appropriate to the role and function of the settlement subject to listed criteria. The flexibility afforded in the policy and the absence of prioritisation of the most sustainable locations, serves to demonstrate that there is a deficiency in setting out an overall strategy for the pattern and scale of employment sought to be delivered contrary to NPPF paragraph 20. The spatial strategy therefore lacks justification as the Plan does not bring sufficient employment land forward through allocations and broad locations noting the deliverability risks of some sites identified in the Wiltshire Employment Land Review Update (document SD/20). There is also an evident need for main

modifications to revise the policy for effectiveness to allow opportunities for existing businesses in other locations to appropriately expand.

21. We consider that further work is therefore required insofar as assessing a suitable range of alternative distributions of development between the three FEMAs in the Wiltshire Council area. This should be underpinned by revisiting the approach to site selection that informed the Plan given the potential necessity to identify an additional supply of employment land for an extended Plan period (see later paragraphs). The additional work should include updates to the SA to assess the broader range of reasonable alternatives and the HRA to both inform the proposed modifications to the Plan and to ensure that the cumulative effects are appropriately assessed and addressed.

Planning for Strategic Logistics Development

22. There are further deficiencies of the Plan and Policy 64 in terms of the approach to strategic logistics development adjacent to M4 Junction 17. In that respect, we acknowledge that the evidential basis for identifying a specific quantum of logistics development in the Plan area to address regional and local needs is not currently available. Nonetheless, given the likelihood that planning applications may come forward imminently during this Plan period, it is essential that the policy approach in the Plan is clearly written and unambiguous so that it is evident how a decision maker should react to development proposals for strategic logistics development.
23. It follows that main modifications will be required to refine the criteria-based approach set out in Policy 64 for national and regional logistics development adjacent to M4 Junction 17. For effectiveness, we recommend that this would be most appropriately achieved through a new policy focussed specifically on strategic logistics development. Ideally, such a new policy in the Plan would be supplemented by identifying a new broad location on the Key Diagram or specific allocations to clearly denote the location where the new policy would apply. The identification of a new broad location or alternatively specific allocations would inevitably require additional work to identify the potential scale/boundaries. This process would need to take account of any likely constraints such as capacity of infrastructure and/or protective land-use designations. The identification of a new broad location or specific allocations should also be informed by updates to the SA, including the assessment of reasonable alternatives for bringing sufficient land forward. Updates to the HRA would also be required to assess any proposed changes that the Council provide to us, including in terms of the cumulative effects with plans and projects elsewhere.

The Plan Period

24. As discussed during the hearing sessions, paragraph 22 of the NPPF - September 2023, amongst other things, requires that strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities, such as

those arising from major improvements to infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

25. Given the extent of work required in this letter, together with the remainder of the hearings programme and consultation process that would likely follow, we consider it unlikely that the Plan would be adopted until 2027. The Plan period may, therefore, need to be extended by at least a further four years to 2042 to ensure that the Plan is consistent with national policy and effective.
26. The implications of extending the Plan period by a further four years would be that the housing and employment requirements would need to be recalculated as previously stated. Further main modifications may also be required to identify sufficient land to ensure that needs could still be met.

Updates to Key Evidence

27. The Council should be mindful that any proposed changes to the Plan will need to be supported by relevant and up-to-date evidence beyond the specific additional work we have already identified in this letter. Adequate and proportionate updates to key evidence, sufficient to inform robust SA and HRA assessments and justify the proposed changes, are likely to be required. The range of evidential updates required will be dependent upon the extent of necessary changes to the distribution of development and identification of new site allocations and/or new or revised broad locations, and their relationship with their surroundings. However, as a minimum they are likely to include updated transport modelling, viability and infrastructure work. In addition, where applicable and relevant, it may be necessary to undertake further localised assessments of potential effects of any new site allocations and new or revised broad locations, such as upon air quality, historic environment, landscape and flood risk.

Other Matters

28. To address our concerns expressed during the recent hearings regarding the identification of strategic policies, we also request that the Council undertake a thorough review of the policies of the Plan having regard to the strategic priorities insofar as they align with Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2024. When undertaking that process, we encourage the Council to be conscious of the differences between strategic and non-strategic policies in the context of NPPF paragraphs 11, 13, 17, 18, 19, 20, 21, 23, 28, 29, 30, 33, 36, 61, 66, 74, 119, 156 and 160.
29. Following on from the legal opinion provided by the Counsel for the Local Planning Authority regarding the ability to partially supersede policies from the existing Development Plan and the Council's further response on this

matter, we also request that the Council clearly sets out which elements of any existing policies the Council proposes to partially supersede through the Wiltshire Local Plan review.

30. The hearings to date have yet to cover the neighbourhood area designation requirements set out in the Plan. However, we are mindful of our soundness concerns regarding the Plan seeking to defer delivery of its strategy and associated strategic objectives to future DPDs. This is also likely to apply to neighbourhood area designation requirements that are included above and beyond the allocations proposed in the Plan.
31. The additional work set out in this letter provides an opportunity for the Council to prepare additional evidence and/or propose modifications to the Plan that provide greater certainty of how neighbourhood area designation requirements are to be delivered. As a minimum it should be made clear how each of the individual requirement figures have been derived and how they are intended to be met (i.e. existing commitments, windfalls or a combination of the two), and whether the Plan incorporates any specific contingencies should the neighbourhood plan process be unable to deliver the identified local needs.
32. The provision for accommodation for Gypsies, Travellers and Travelling Showpeople is not currently addressed by the Plan on the basis that a separate Gypsies and Travellers DPD is under preparation. The Gypsies and Travellers DPD is identified in the Wiltshire Local Development Scheme - March 2025 (document SD/39A) as expected to be submitted for examination in the 3rd quarter of 2025. It follows that we would be grateful for an update of the progress on the preparation of the DPD in response to this letter. The provision of accommodation for Gypsies, Travellers and Travelling Showpeople is necessary to be included in the development plan for consistency with NPPF paragraph 62. As such, we also request that the Council prepare a proposed modification to the Plan that would provide certainty that the matter will be addressed by a separate DPD.

Next Steps and Concluding Remarks

33. We would like to thank the Council and participants for their co-operation during the Examination to date. Assuming that the Council would be content to progress the Examination based on the actions which we have indicated are necessary, we would be grateful of an estimate of the likely timescales associated with the individual actions. In summary the actions are:

Spatial Strategy

- Consider a range of alternative distributions of housing and employment between the four HMAs to determine whether housing needs can be met in the earlier parts of the plan period. This should be informed by updates to the SA and HRA, which should consider a range of reasonable

alternatives, including whether a stepped housing requirement is needed at all.

- Revisit the site selection methodology to identify additional housing and employment land as may be required.

Broad Locations

- Provide additional evidence to demonstrate that there is a reasonable prospect that the broad locations can be developed within the timescales envisaged, or if not, suggest how the soundness issues can be overcome by main modifications.

Potential for Plan Period Extension

- Assess and set out the implications of extending the Plan period to meet the minimum 15-year plan period envisaged by the NPPF making the Plan period run to 2042.
- Update the housing and employment land requirements accordingly.

Potential Main Modifications

Aside from the issues identified above, the following changes will also be necessary to the Plan and should be addressed by the Council in responding to our Initial Findings:

- Deletion of the Salisbury Area New Community Area of Search;
- Amendments to the approach to employment land and strategic logistics (including possible new policy and allocations);
- Clarification of the relationship with the Gypsies and Travellers DPD;
- Explanation of the approach to delivery of requirements in neighbourhood area designations;
- Clarification of the alignment of strategic policies with legislation and national policy, and;
- Amendments to provide greater specificity of the approach to the partial superseding of existing policies.

Evidence and Assessments

- Updates to any key evidence considered necessary to justify the resultant changes proposed to the Plan.

34. We look forward to receiving a response from the Council **by not later than 30 January 2026**. The Council's response should include the intended programme for the next stage of the Examination consisting of the expected dates of completion for each item of work, key milestones and the dates when monthly progress updates will be provided. Ideally the entire programme of works should be completed as soon as possible to avoid unreasonable delay to the examination. Please note that whether the Examination can proceed to the remaining hearings would then be dependent on our consideration of the additional work provided and the responses to a consultation that will follow.

35. Having regard to the amount of time that has already elapsed since the Plan was submitted, we should be informed as soon as possible if the Council is unable to complete the requested additional work in a timescale that would avoid an overly long examination. In those circumstances, we would have to reconsider how best to take the Examination forward.
36. If there are any procedural or other questions arising from this letter, the Council should contact us via the Programme Officer in the first instance. We would be grateful if this letter could be placed on the examination website at the earliest opportunity. We are not inviting, nor envisage accepting, any comments from other examination participants at this stage.

Yours sincerely,

Philip Mileham

INSPECTOR

Gareth Wildgoose

INSPECTOR



APPENDIX 3

Wiltshire Council's Letter to Inspectors 30.01.26

Date: 30 January 2026

Inspectors:

P. Mileham BA (Hons) MA MRTPI

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Programme Officer:

Ian Kemp

Strategic Planning

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Sent by email: ian@localplanservices.co.uk

Dear Mr Mileham and Mr Wildgoose,

Wiltshire Local Plan examination - response to Inspectors' post Stage 2 hearings letter

Thank you for your letter dated 22 December 2025, received on 29 December 2025, following the Stage 2 hearing sessions, setting out your initial views on the next steps of the Wiltshire Local Plan examination¹. We would like to express our appreciation for the constructive guidance you have provided throughout the process to date and take comfort that you consider that the matters you have identified could be overcome. We are grateful to you for adopting a flexible approach to examining Wiltshire's Local Plan as recommended in the Minister's 9 October 2025 letter to the Planning Inspectorate's Chief Executive². We look forward to continuing to work with you to resolve outstanding matters and to achieve an adoptable Plan as soon as possible.

Having carefully considered the issues and actions which you have identified, we have taken steps to put in place the resources and necessary governance structure to allow us to undertake the work necessary to progress the examination expeditiously. We agree with your comment (paragraph 25 of your letter) that it is now unlikely that the Plan will be adopted until 2027. However, we are committed to ensuring adoption as soon as possible.

The details of how we intend to proceed, in response to your letter, have been set out in our 'Proposed Programme of Work', as an attachment to this letter. We have broken the actions you have identified down into workstreams to make it easier to monitor and keep track of progress. You will note that two alternative timelines are proposed, and the reason for this is set out below.

Given the interrelated nature of the work proposed, in many instances the work does not easily break down into discrete items, particularly those that relate to the Spatial Strategy. As such, whilst we have endeavoured to indicate in the Proposed Programme of Work when specific items will be complete, we are suggesting that information relating to progress will be provided within the monthly progress updates. The Proposed Programme of Work seeks to address all of the matters raised in your letter and ought to be largely self-explanatory. However, we draw attention to the following aspects of particular note.

First, under the heading 'Housing Need and the Housing Requirement', your letter requests a rebase of the start of the plan period and recalculation of the Local Housing Need using the input variables at the point of the Plan's submission. The calculation equates to a Local Housing Need of 1,917 dwellings per annum for the rebased Plan. The implications of this for the actions set out in the letter will be incorporated in the work programme.

¹ [Examination Document ID12](#)

² [Matthew Pennycook letter of 9 October 2025](#)

Second, we note in your summary of actions at paragraph 33 of your letter that one of the main tasks, under the heading 'Potential for Plan Period Extension', is to "*Assess and set out the implications of extending the Plan period to meet the minimum 15-year plan period envisaged by the NPPF making the Plan period run to 2042*". Since the hearing sessions, we have given careful consideration to the implications of extending the plan period by a further four years. Our initial assessment is that this would be complex and likely result in significant main modifications being proposed to address the higher number of homes (and potentially land for employment) over the extended plan period, as recognised in paragraph 6 of your letter.

We consider that retaining a 2038 end date for the Plan would provide a much higher degree of certainty that the issues raised can be addressed expeditiously. While technically possible to prepare the evidence to support a plan period to 2042, this would be more complex and time-consuming and therefore inevitably delay the examination. We are also mindful that the work would need to be undertaken without the level of consultation and engagement that we would normally undertake with local communities in the earlier stages of the plan making process.

The attached Programme of Work includes details of work required for both scenarios, retaining the 2038 end date (Option A) and extending to a 2042 end date (Option B). As will be seen, the 2038 option runs to September 2026, while the 2042 option runs to December 2026. It goes without saying that projecting an accurate timeline for Option B has been more challenging.

The council remains of the view that the preferred solution would be to retain the 2038 end date. We recognise the issues raised at paragraph 24 of your letter but consider that it would be preferable to proceed promptly to adoption of a plan with a 2038 end date, rather than delaying to provide for a 2042 end date. If you remain concerned about retaining a 2038 end date, the council considers that these would be best addressed by a main modification to provide for an early review. As discussed at the hearing sessions, commitments to early reviews are contemplated as mechanisms for addressing soundness concerns in both the Planning Practice Guidance³ and the Planning Inspectorate's 'Procedure Guide for Local Plan Examinations'⁴.

The council considers that avoiding the delay that extending the plan period to 2042 would entail is also supported by the revisions to the plan-making system coming into force this year. We discussed at the hearing sessions, in the light of the transitional arrangements in the December 2024 National Planning Policy Framework, the likelihood that we would need to be starting work on a new local plan through the new plan-making system straightaway. Since then, the Government has made it clear that they will set out in regulations final 'backstop' dates for when plan-making must legally have commenced, and "*local planning authorities covered by the NPPF transitional arrangements will have to commence formal plan making (Gateway 1) by 31 October 2026, while those that have a plan that is already over five years old must commence by 30 April 2027.*"⁵ We are also mindful that, in parallel to this, we will be working with our Wessex partners on a new Spatial Development Strategy and, as you will appreciate, would wish to ensure that our plan-making functions are exercised efficiently.

While the regulations have not yet been published, we have recently received a letter from MHCLG (attached to this letter) confirming the expectation that because the housing requirement in our Plan, as submitted for examination, would meet less than 80% of the standard method Local Housing Need, we would be required to start a local plan early in the new plan-making system by publishing our notice to commence plan preparation by 30 June 2026 and our Gateway 1 self-

³ See the section on Plan-making, at paragraph: 050 Reference ID: 61-050-20190315.

⁴ Paragraph 6.13.

assessment by 31 October 2026. This provides further comfort that the council will not delay planning to meet needs in the post-2038 period if it adopts the Plan with its current 2038 end date.

For those reasons, the council's preference would be to pursue Option A (maintaining the 2038 end date) rather than Option B (extending the plan period to 2042) in the Proposed Programme of Work. However, we welcome your views on that issue.

Third, with regard to your request (at paragraph 32 of your letter) for an update on progress on the emerging Gypsies and Travellers Development Plan Document (DPD), we updated the Local Development Scheme in September 2025⁶. A copy of this has been provided to the Programme Officer for the document library. The updated timetable reflects the need to undertake further work to ensure compliance with national planning policy and the revised definition in the Planning Policy for Traveller Sites (December 2024). It includes a further Regulation 19 consultation in the summer with submission programmed for December 2026. We would be happy to update you on progress on this emerging DPD as part of our monthly progress updates.

Fourth, we have not included consultation activity within the Proposed Programme of Work as you have indicated in paragraph 34 of your letter that this will follow completion of the work. In terms of dates for monthly updates, these are as follows: 27 February, 31 March, 30 April, 29 May, 30 June, 31 July and 28 August (and if necessary, 30 September, 30 October and 30 November).

We are committed to working collaboratively to secure a sound and effective Local Plan for Wiltshire. We hope that this letter and the Proposed Programme of Work provide the clarity you require. We look forward to learning your views on whether we should pursue Option A or B in the Programme of Work, and if you have any other issues, please do not hesitate to raise them with us.

Yours sincerely



Nic Thomas
Director - Planning, Economy and Regeneration

Attachments:

Wiltshire Local Plan Examination Proposed Programme of Work, 30 January 2026
Implementation of reforms to the plan-making system, MHCLG, 15 January 2026

⁵ Matthew Pennycook Statement made on 27 November 2025

⁶ Wiltshire Local Development Scheme September 2025