

**OUTLINE PLANNING APPLICATION, WITH ALL
MATTERS RESERVED EXCEPT FOR THE MAIN POINT OF
ACCESS FROM DEVIZES ROAD, FOR THE DEMOLITION
OF EXISTING BUILDING, AND DEVELOPMENT OF UP TO
80 DWELLINGS, PUBLIC OPEN SPACE, DRAINAGE,
LANDSCAPING AND ANCILLARY WORKS**

ON BEHALF OF REDCLIFFE HOMES LTD

**LAND NORTH OF DEVIZES ROAD, HILPERTON,
TROWBRIDGE**

Planning Statement

February 2026

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PLANNING



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REPORT CONTROL

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1.0 INTRODUCTION

- 1.1 On behalf of our client, Redcliffe Homes Ltd, Grass Roots Planning have been instructed to prepare and submit an outline planning application, with all matters reserved except for access, for the demolition of an existing building and development of up to 80 dwellings, public open space, drainage, landscaping and ancillary works, at land north of Devizes Road, Hilperton, Trowbridge ('the site'). The site lies within the administrative boundary of Wiltshire Council (WC).
- 1.2 The site forms the first phase of an emerging strategic allocation set out within Wiltshire Council's new Local Plan for 600 dwellings (Policy 53 – 'Land North-East of Hilperton, Trowbridge'), providing the principal access into the development, a road sufficiently wide enough and designed to accommodate a bus link and the rest of the allocation, and circa 80 dwellings.
- 1.3 Part of the site was subject to a previous application (Application Ref: PL/2022/07977) which sought detailed permission for 36 dwellings, which was refused in December 2023 predominantly based on perceived lack of sufficient survey information and incompliance with the Trowbridge Bat Mitigation Strategy (TBMS), as well as a lack of s106 agreement. No appeal was lodged following the refusal of planning permission.
- 1.4 Since this time, several meetings have been held with the Council's Planning Policy Team and other key stakeholders regarding the emerging allocation and a Statement of Common Ground (SoCG) in respect of the wording of the policies related to this site has been agreed between the Council and the various parties which control the wider site (see further details of this in Section 4).
- 1.5 Whilst the application seeks outline planning permission only, the documents and plans submitted set a number of parameters that any future reserved matters application would need to adhere to, to ensure that a high-quality design can be achieved.
- 1.6 Given that Redcliffe Homes are already involved in the site as the developer of this land, it is likely that units will be able to come forward within the next five-year period, subject to a timely planning permission. This will assist with meeting five-year housing land supply, which is currently estimated to be circa 2.4 years in Wiltshire. Delivery of sites such as this are critical to maintaining a five-year housing land supply; the development of this site in the manner suggested also underpins the wider allocation's deliverability by bringing forward this first phase of new homes.

1.7 The application is supported by the following technical plans and documents as follows:

- Application Forms & Certificates;
- Affordable Housing Statement prepared by Grass Roots Planning;
- Air Quality Assessment prepared by Entran;
- Arboricultural Impact Assessment prepared by David Jarvis Associates;
- Design & Access Statement prepared by Thrive;
- Draft s106 Heads of Terms;
- Ecological Impact Assessment prepared by GE Consulting;
- Biodiversity Net Gain calculations & report prepared by GE Consulting;
- Flood Risk Assessment prepared by Rappor;
- Drainage Strategy prepared by Rappor;
- Framework Travel Plan prepared by Pegasus;
- Heritage Impact Assessment prepared by EDP;
- Landscape & Visual Appraisal prepared by David Jarvis Associates;
- Lighting Assessment prepared by Highways Lighting Solutions;
- Landscape Plans prepared by David Jarvis Associates;
- Noise Assessment prepared by Entran;
- Statement of Community Involvement prepared by Grass Roots Planning;
- Transport Statement prepared by Pegasus;
- Access Plans prepared by Pegasus:
 - Proposed Site Access Arrangements (Ref: Figure 5.1)
- Plans prepared by Thrive:
 - Site Location Plan - 01 (Ref: LP-01_Rev P4)
 - Concept Masterplan - 01 (Ref: CMP-01_Rev P10)
 - Combined Parameter Plans - 01 (Ref: CPP-01_Rev P4)

2.0 SITE DESCRIPTION

- 2.1 The site is located on the north-eastern edge of the settlement of Hilperton. It is bound by Devizes Road and the A361 roundabout to the south-east, existing residential properties on the south-west, agricultural fields to the north and Public Right of Way (PRoW) to the east that connects to Whaddon Lane to the north.
- 2.2 The site comprises two field parcels last used as horse paddocks, with an area of scrubland; and is relatively flat with a gentle gradient from west to east. It contains a building which previously was used for residential purposes and as a stable. A site aerial is shown in figure 1 below.



Figure 1. Site Location

- 2.3 Hilperton is a village located circa 1.3 miles to the north-east of the town centre of Trowbridge. It is separated from Trowbridge by a small number of fields which constitute what is locally known as the 'Hilperton Gap'.
- 2.4 Hilperton has a small number of services and facilities including a public house 'The Lion and Fiddle' located on Devizes Road, Hilperton Church of England primary school, St Michael's

Pre-School, a village hall, a play park, St Michael and Angels Church, the Trowbridge Rugby Football Club and Movevolution Fitness Centre. Paxcroft Mead and Trowbridge have a variety of services including Paxcroft Café, Budgens Store, Paxcroft Pharmacy, Roundstone Doctors Surgery, Paxcroft Mead Community Centre, Busy Bees Nursery, Bellefield Primary School, St Augustine's Catholic College, The John of Gaunt School, Harris, Hill & Gibbons Veterinary Group, Oriental Dragon Chinese Takeaway, Canal Road Industrial Estate, Doric Business Centre, among others.

- 2.5 The site does not lie within a National Landscape, Site of Special Scientific Interest, landscape designations or within a conservation area or Flood Zones 2/3. The site is located within the yellow and grey zones, as identified in the Trowbridge Bat Mitigation Strategy (TBMS), associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC).
- 2.6 There are no listed buildings located within 500m and there are no PROWs that cross the site; however, there is a footpath running alongside but outside of the site's eastern boundary.
- 2.7 The site's size is approximately 4 ha.

3.0 PROPOSED DEVELOPMENT

- 3.1 The proposed development for which we are seeking outline planning permission with all matters reserved except for the main point of access from Devizes Road comprises the demolition of an existing building, and development of up to 80 dwellings, public open space, drainage, landscaping and ancillary works. An extract of the concept master plan is shown below:



Figure 2. Concept Master Plan

- 3.2 In respect to the residential element of the scheme, a varied mix of housing has been proposed as a response to local need. The following is provided:
- Up to 80 dwellings with 30% of these homes (a total of 24) being affordable units;
 - A mix of 1, 2, 3 and 4 bedroom properties;
 - Whilst the application is for outline permission, it is anticipated that dwellings would range between terraces, semi-detached and detached properties; and
 - Of the 23 affordable properties there will be a mixture of Social Rent (70%) and Shared Ownership (30%).
- 3.3 The vehicular access for the site is proposed to be taken from the south-eastern boundary off the roundabout at the Devizes Road and A361 junction, with a primary street corridor running towards the north that will measure 18.3m wide and includes a 6.5m carriageway, a tree lined boulevard and a cycleway on one side.

- 3.4 The proposal includes the provision of pedestrian and cycle connectivity between the site access, the PRow to the east, local facilities and the wider Hilpertown area. There is a clear hierarchy of streets and spaces within the layout to aid permeability and encourage walking and cycling.
- 3.5 The layout of the illustrative master plan is the result of careful consideration of the site's constraints and opportunities and responds to the character and landscape of the site and the wider area.
- 3.6 The existing boundary trees and hedgerows will be retained and enhanced where possible. A 50m wide habitat corridor along the eastern boundary of the site will provide a dark route for bat flight path and opportunity for Biodiversity Net Gain (BNG).
- 3.7 The scheme will deliver a play area and areas of public open space throughout the site, including the 50m green/bat corridor to the east, a 10m corridor from the south towards the north of the site, and a 5m landscape buffer to the south-western boundary. These will be accessible not only to the new residents but to existing residents in the area.
- 3.8 Planting new tree avenues and hedgerows is also proposed, with drainage basins and surrounding green open space to provide biodiversity enhancements.
- 3.9 Attenuation features in the form of ponds are proposed in the eastern and southern parts of the site, with below-ground attenuation also proposed. These areas will also provide enhanced habitats and landscaping to achieve a biodiversity net gain.
- 3.10 The proposed scheme would create a high-quality and a distinctive neighbourhood to complement the vernacular character of Hilpertown Village. The proposed homes will be traditional in form, the material and colour palette will form part of a RM application, but it is envisaged that it will be based on building materials found traditionally in Hilpertown such as a palette of bath stones, earth reds, white and creamy render, including predominately buff coloured stone with multi- red facing brick, grey slate roofs and dark red roof tiles, along with detailing which reflects the existing style of Hilpertown area. Further details are provided within the Design & Access Statement.
- 3.11 Parking will be provided in accordance with Wiltshire Council standards, with one space for one-bedroom homes, two spaces for two and three-bedroom homes, and three spaces for four-bedroom homes. Additional visitor parking will be provided across the development to achieve 20 per cent. All houses will have Electric Vehicle charging points.

- 3.12 Cycle parking/storage will be provided for each dwelling to meet Wiltshire Council standards, either within the rear of garages or in dedicated sheds located in rear gardens.

4.0 PLANNING STATUS & SITE HISTORY

Planning Status

- 4.1 The site lies outside of the settlement boundary on the north-eastern periphery of Hilperton and within/adjacent to Trowbridge which is identified as a Principal Settlement within Core Policy 1, and identified as a 'strategically important centre and a primary focus for development', aiming to provide a significant level of jobs and homes.
- 4.2 As an extract of the planning policy maps shows below in figure 3, the site is not subject to any specific constraints such as National Landscape, Flood Zone 2/3, Site of Special Scientific Interest (SSSI) or within a conservation area. The site is located within the yellow and grey zones, as identified in the Trowbridge Bat Mitigation Strategy (TBMS), associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC).

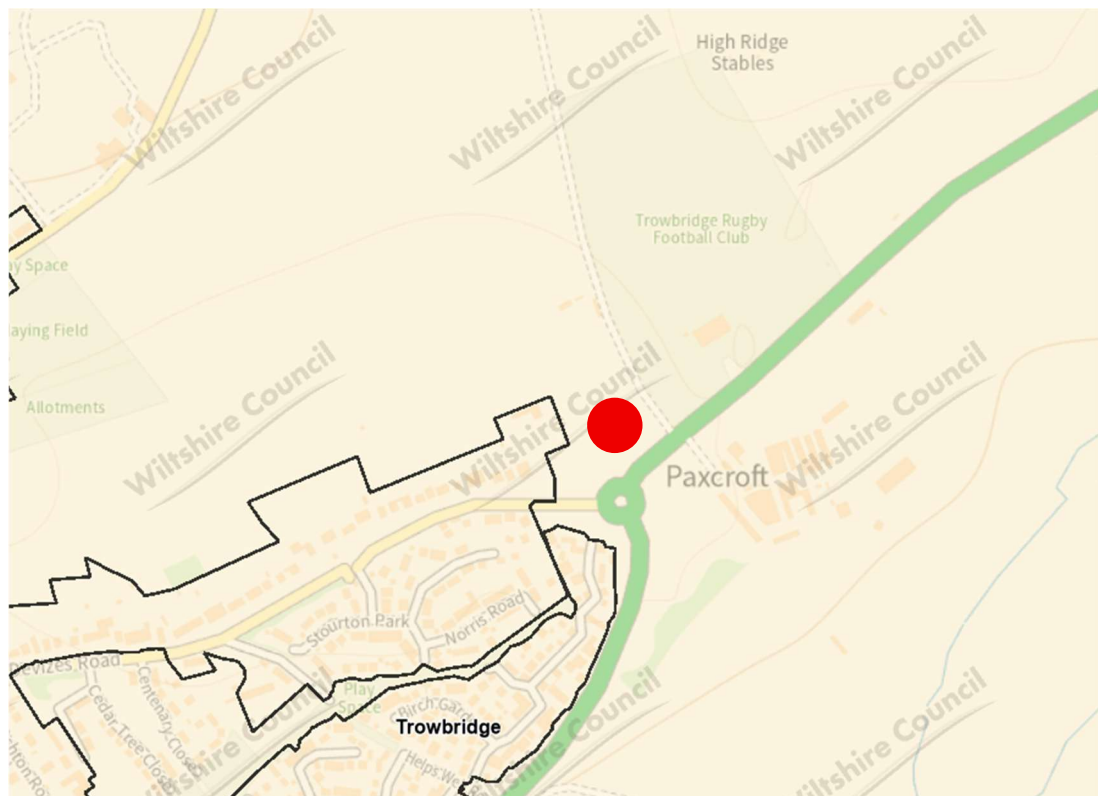


Figure 3. Extract of Wiltshire Planning Policy Maps (approximate site location shown in red)

- 4.3 There are no Public Rights of Way (PRoW) within the site, but a byway (HILP21) lies directly to the east, a bridleway (HILP25) to the south-east and footpaths further to the west as shown in figure 4 below.

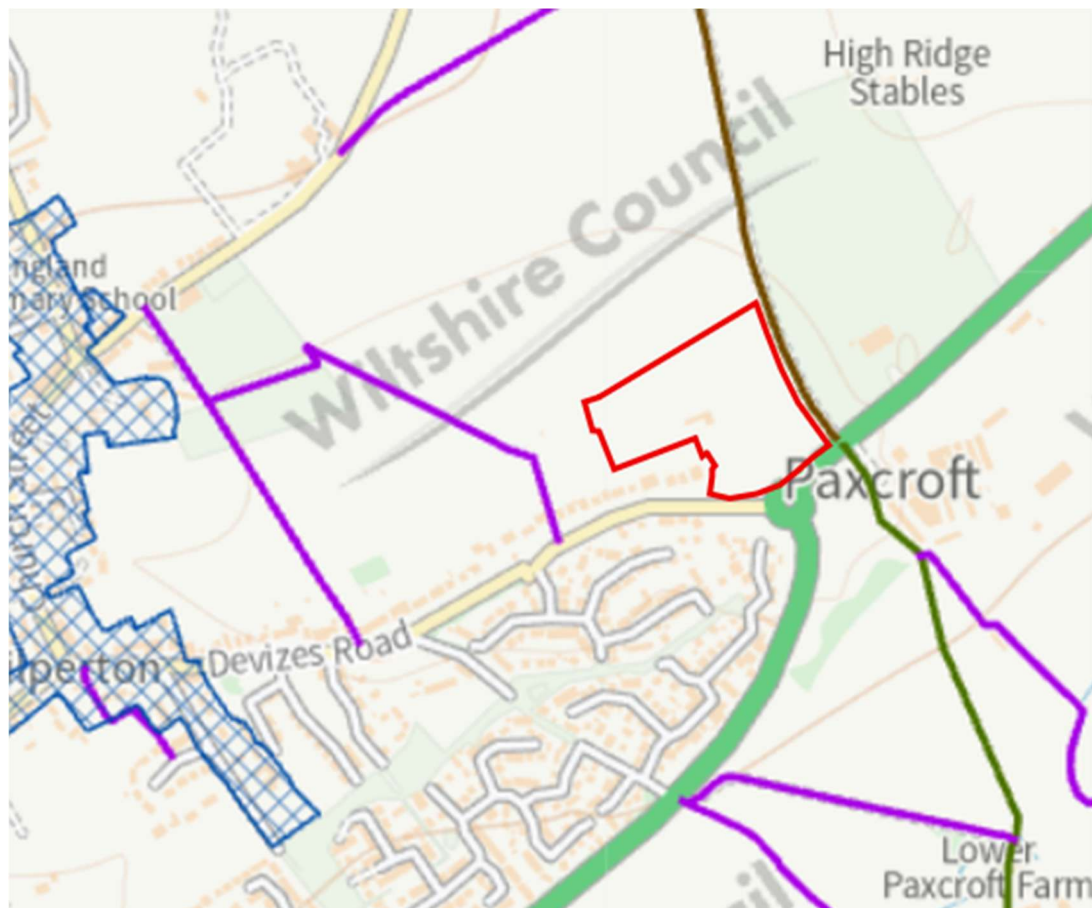


Figure 4. Extract of WC's Planning Policy Map showing the site (red), Conservation Area (hatched in blue) and PROWs (byway in brown, bridleway in dark green, footpath in purple)

Emerging Local Plan

- 4.4 Wiltshire's draft Local Plan identifies a number of strategic allocations to meet housing and employment needs across the county over the next plan period. With respect to Hilperton, the proposed allocation is for 600 dwellings (Policy 53 – 'Land North-East of Hilperton'), together with a primary school, convenience store, and early years learning facility (see Council's masterplan below). The site forms part of this emerging allocation and would effectively be the first phase of the wider development.

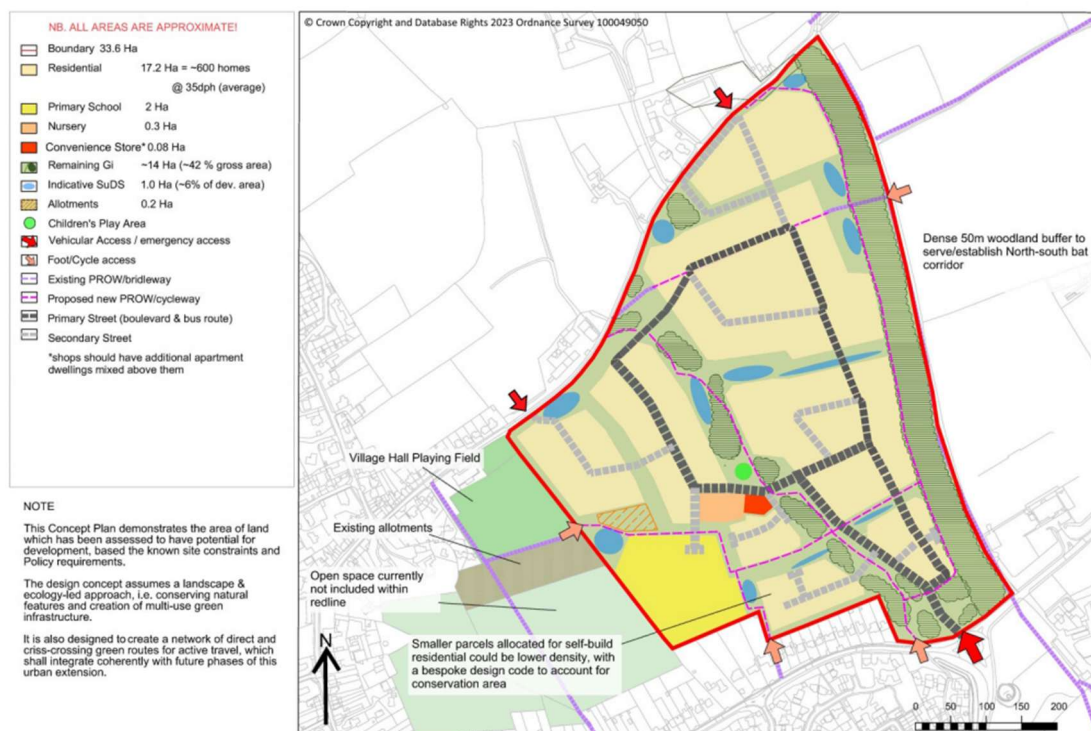


Figure 5. Land North-East of Hilperton, Trowbridge WC's Concept Plan

Planning History

4.5 Previous planning applications on the site are as follows:

- **PL/2022/07977** – Application for full planning permission for demolition of existing building (residential/stable block) and the erection of 36 dwellings, formation of new vehicular access from A361 and Devizes Road roundabout, landscaping, drainage and other associated infrastructure works (amended details). Land North of Devizes Road, Hilperton, Trowbridge, BA14 7QS. Refused December 2023.

4.6 Other applications of relevance within the nearby area:

- **PL/2023/10559** - Outline application (with all matters reserved except for access) for the demolition of existing farm buildings and the erection of up to 180 residential dwellings (Class C3) with associated infrastructure including landscaping, open space, surface water drainage and internal access roads. Approved January 2026.
- **PL/2023/05469** – Application for full planning permission for the erection of a freestanding McDonald's Restaurant. Land to the east of Hilperton Drive and the A361 roundabout and to the west of 63a, 63b and Units 1E And 1F at Paxcroft, Hilperton, Wilts, BA14 6JB. Refused November 2023.
- **17/04354/FUL** – Application for full planning permission for construction of a 440m long, 3m wide path/training track around perimeter of floodlit pitch, consisting of geotechnical membrane covered with 125mm deep type 1 stone, topped with 25mm deep "Redgra" type cinder finish dressing contained by wooden edging. Land

Opposite Paxcroft Farm, Paxcroft, Hilperton. Approved October 2012. Approved July 2017.

- **W/12/01169/FUL** – Application for full planning permission for proposed rugby ground including clubhouse, store, sports pitches with floodlighting and associated landscape bunding, access and parking. Land Opposite Paxcroft Farm, Paxcroft, Hilperton. Approved October 2012.

Pre-Application Engagement and Consultation

- 4.7 In line with the requirements of the NPPF, the Localism Act 2011 and Wiltshire Council Statement of Community Involvement (2020), a programme of pre-application community and stakeholder consultation was carried out at the beginning of 2026 between 9th January and 1st February, and a Statement of Community Involvement (SoCI) has been submitted alongside the other documents that accompany the planning application.
- 4.8 The activities undertaken as part of the consultation process included:
- Communication via emails with the Clerk to Hilperton Parish Council and with the Ward Councillor;
 - A postcard sent to local residents providing details of the consultation process;
 - A bespoke project website www.devizesroad-hilperton.com was launched on 9th January 2026 providing further information on the plans, a way to provide feedback and detail of how to get in touch with the team via telephone or email.
- 4.9 A total of 40 responses were received during the consultation period (9th January – 1st February 2026), comprising:
- 39 comments via the online Consultation Questionnaire; and
 - 1 comment via direct email.
- 4.10 In addition to this, several meetings have been held with the Council and other promoters of the wider allocation and this has culminated in a Statement of Common Ground (SoCG) being prepared as part of the Local Plan evidence base. As part of this evidence base, an alternative masterplan was agreed between parties, an extract of which is shown below in figure 6:

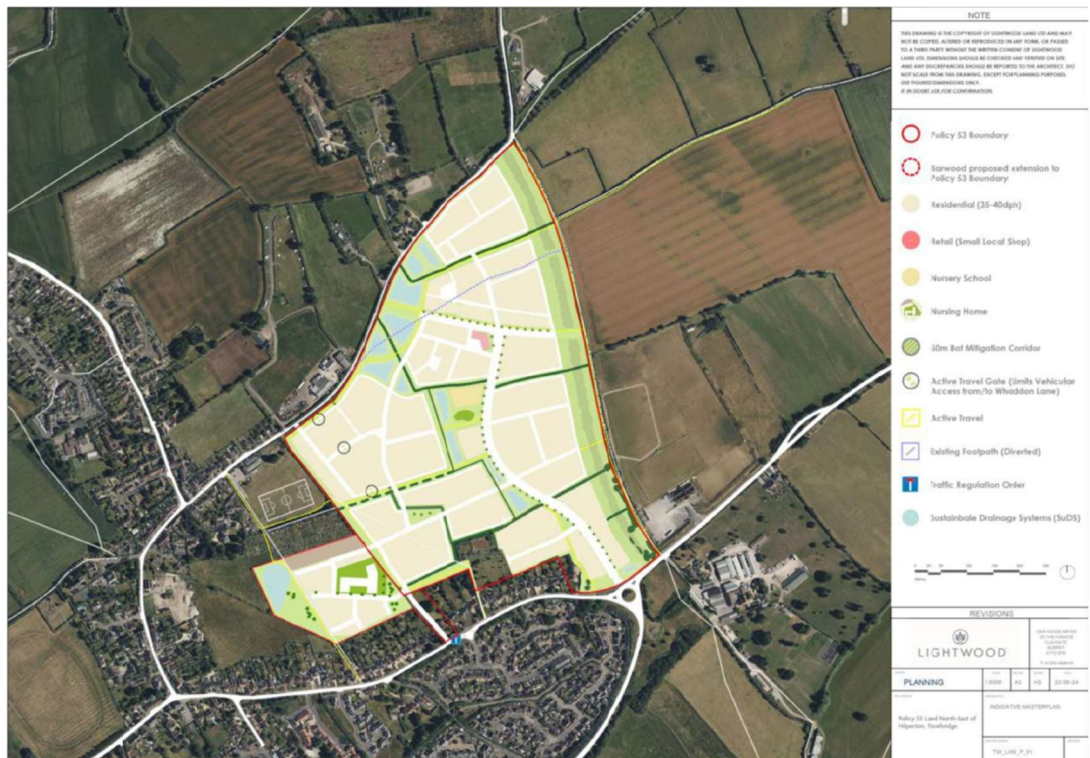


Figure 6. Extract of Developer Concept Plan from agreed SoCG

4.11 A summary of the feedback received is included in the SoCI.

5.0 PLANNING POLICY

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless other material considerations indicate otherwise.
- 5.2 In this case, the development plan which applies to these proposals comprises:
- The Wiltshire Core Strategy (adopted January 2015)
 - Wiltshire Housing Site Allocations Plan
 - Hilperton Neighbourhood Plan (made November 2018)
- 5.3 The ‘other material considerations’ referred to in the Act would include the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG), and relevant Supplementary Planning Guidance (SPG) or Supplementary Planning Documents (SPD) (emerging and adopted) such as the Trowbridge Bat Mitigation SPD.

Wiltshire Core Strategy

- 5.4 The Wiltshire Core Strategy (CS) provides strategic planning policy for Wiltshire and covers the period up to 2026.
- 5.5 The relevant CS policies to the application’s assessment are set out below:

Core Policy 1: Settlement Strategy – identifies the settlements where sustainable development will take place: Principal Settlements, Market Towns, Local Service Centres, and Large and Small Villages. Trowbridge is identified as a Principal Settlement and Hilperton as a Large Village.

Core Policy 2: Delivery Strategy – in line with Policy 1, this strategy aims to deliver development by making provision for a minimum provision of 42,000 homes, with the scale of proposed development reflecting the size and range of services and facilities associated with each settlement. This policy states that development will not be permitted outside of settlement boundaries.

Core Policy 3: Infrastructure Requirements – sets out that new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal.

Core Policy 29: Spatial Strategy for the Trowbridge Community Area – sets out that development within the Trowbridge Community Area (which includes Hilperton) should be in

accordance with the Settlement Strategy set out in Core Policy 1 where Hilperton is defined as a Large Village.

Core Policy 41: Sustainable construction and low-carbon energy – states that new development should incorporate design measures to reduce energy demand. This policy confirms that all major development proposals will be required to submit a sustainable energy strategy outlining the low-carbon strategy for the proposal.

Core Policy 43: Providing affordable homes – sets out the required provision of affordable housing within the 30% and 40% affordable housing zones. It states that provision of affordable housing may vary on a site-by-site basis, and tenure will be negotiated on a site-by-site basis. This policy indicates that affordable housing units will be dispersed throughout the development and designed to a high quality so as to be indistinguishable from other development.

Core Policy 45: Meeting Wiltshire's housing needs – states that the type, mix and size of new housing must address local housing need to create mixed and balanced communities. This policy states that the Wiltshire Strategic Housing Market Assessment identifies the housing needs of Wiltshire, and any variation to this will need to be justified through the production of new, sound evidence from either an update Strategic Housing Market Assessment or other credible evidence source.

Core Policy 50: Biodiversity and geodiversity – this policy highlights that development proposals must demonstrate how they protect, retain and enhance features of nature conservation and geological value, and when this is not possible, ensure the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource.

Core Policy 51: Landscape – states that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact on landscape character, while negative impacts must be mitigated as far as possible through design and landscape measures. This policy highlights that proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s).

Core Policy 52: Green infrastructure – states that development should retain and enhance the Council's green infrastructure network, and sets out that suitable links to the network are provided and maintained making provision for accessible open spaces, and ensuring long term management of the green infrastructure related to the development proposals.

Core Policy 57: Ensuring high quality design and place shaping – states that all new developments should have a high standard of design and create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new developments should be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire.

Core Policy 58: Ensuring the conservation of the historic environment – highlights that development should protect, conserve and where possible enhance the historic environment.

Designated heritage assets and their settings must be conserved and where appropriate enhanced in a manner appropriate to their significance.

Core Policy 60: Sustainable transport – states that the council 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.

Core Policy 61: Transport and new development – sets out that new development should be located and designed to reduce the need to travel particularly by car, and to encourage the use of sustainable transport alternatives. It also sets out the consideration that a Transport Assessment must demonstrate. Where appropriate, contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives.

Core Policy 62: Development impacts on the transport network – indicates that developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. Proposals for new development should not be accessed directly from the national primary route network outside built-up areas, unless an over-riding need can be demonstrated.

Core Policy 64: Demand management – sets out that demand management measures will be promoted where appropriate to reduce reliance on the car and to encourage the use of sustainable transport alternatives. These measures include car parking management such as residential parking standards and smarter choices measures to influence people's travel behaviour towards more sustainable travel options (i.e. travel plans) among others.

Core Policy 67: Flood Risk – states 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.

Wiltshire Housing Site Allocations Plan

- 5.6 The Wiltshire Housing Site Allocations Plan (WHSAP) was adopted in February 2020 with the aim to distribute and allocate sites for housing development in accordance with Core Policy 1 and 2 of the Wiltshire Core Strategy and to revise where necessary settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages.
- 5.7 The application site is within the North and West Wiltshire Housing Market Area, it lies outside of the Hilperton settlement boundary and is not an allocated site for housing.

Hilperton Neighbourhood Plan

- 5.8 The Hilperton Neighbourhood Development Plan (HNDP) was ‘made’ in November 2018 and covers the period 2017 – 2026. It forms part of the Development Plan. The relevant policies within the HNDP are the following:

Policy 2: Housing – states that in order to meet local market and affordable housing needs new development will be encouraged within the settlement boundary of Hilperton and exceptionally in the countryside where it satisfies national and strategic policies.

Policy 3: Heritage and Design – sets out that applications for development should demonstrate how they have paid attention to the village design statement as appropriate.

Policy 4: Sustainable Transport – highlights that development proposals within the plan should demonstrate:

- That the site itself is directly and adequately served by the existing network of paths. Where there is no direct physical link into the network from the development, a link should be provided or, where this is impracticable, contributions made to upgrading the overall local system in lieu.
- Where appropriate, contributions will be sought to upgrade footpaths to cycle paths, provide road crossings at appropriate points, improve surfaces and signage. Contributions may also be sought to improve the local bus service.
- This policy states that particular priorities for local investment are:
 - Improving path links that facilitate safe foot or cycle journeys to and from Trowbridge.
 - Providing safe crossings where paths cross roads (e.g. Elizabeth Way).
 - Upgrading footpaths to cycle paths where possible, and in particular across the Hilperton Gap.
 - Improving bus service frequency and range of destinations.
- In relation to bat habitat this policy confirms that proposals will only be implemented where it can be demonstrated that there will be no deterioration of bat habitat as a result of lighting or changes to hedgerows and trees along proposed and existing paths.

Policy 5: Infrastructure and Developer Contributions – sets out that developer contributions from Community Infrastructure Levy and Section 106 agreements will be used, where appropriate, to deliver local infrastructure identified in the Community Actions.

Emerging Local Plan

- 5.9 In addition to the adopted development plan, the emerging Wiltshire Local Plan is a material consideration in the determination of the application. The Council has now progressed its Regulation 19 Draft Local Plan (Pre-Submission Draft 2020–2038) which was formally

submitted to the Secretary of State for Housing Communities and Local Government for independent examination on 28 November 2024.

- 5.10 At the time of writing, the Inspectors have provided a 'Detailed Stage 2 Post Hearings Letter' setting out their initial views on the next steps of the Plan Examination. In summary, the letter sets out the further work that the Inspectors consider necessary to overcome the shortcomings they have identified.
- 5.11 While the emerging Local Plan has been submitted for examination, it has not yet been adopted and therefore does not form part of the statutory development plan. In accordance with national planning policy, the weight to be attributed to emerging policies is dependent on the stage of preparation, the extent of unresolved objections, and the degree of consistency with national policy.
- 5.12 At this stage, it is considered appropriate that the emerging Wilshire Local Plan is afforded moderate weight. This reflects the fact that the plan has reached an advanced stage in the plan-making process, but that it remains subject to examination and potential modification prior to adoption. From our own experience, such examination processes can take in the region of 2-3 years from submission, and may require additional consultation, changes to the plan, and both main and minor modifications.
- 5.13 The application site forms part of a proposed strategic allocation within the emerging Local Plan (WLP Policy 53: Land North-East of Hilperton, Trowbridge) which main function is to provide additional homes (approximately 600 dwellings) over the Plan period (see figure 5 in Section 4 of this Statement), including a primary school, convenience store, and early years learning facility. The principle of development on the site has therefore been considered through the plan-making process, albeit this does not predetermine the outcome of the application. The emerging policy context is accordingly a relevant material consideration, to which moderate weight should be attached alongside the adopted development plan and other material considerations.
- 5.14 The relevant policies to the application's assessment included within the Emerging Local Plan are set out below:
- WLP Policy 1: Settlement Strategy
 - WLP Policy 2: Delivery Strategy and WLP Policy 3: Housing Delivery
 - WLP Policy 3: Reserve Sites for Housing and Broad Locations for Growth
 - WLP Policy 5: Securing Infrastructure Provision from New Development
 - WLP Policy 52: Trowbridge Principal Settlement
 - WLP Policy 53: Land North-East of Hilperton, Trowbridge

- WLP Policy 70: Sustainable Transport
- WLP Policy 72: Development Impacts on the Primary and Major Road Networks
- WLP Policy 73: Transport Demand Management
- WLP Policy 76: Providing Affordable Homes
- WLP Policy 78: Meeting Wiltshire's Housing Needs
- WLP Policy 85: Sustainable Construction and Low Carbon Energy
- WLP Policy 88: Biodiversity and Geodiversity
- WLP Policy 89: Biodiversity Net Gain
- WLP Policy 91: Conserve and Enhancing Wiltshire's Landscape
- WLP Policy 95: Flood Risk
- WLP Policy 98: Ensuring High Quality Design and Place Shaping
- WLP Policy 99: Ensuring the Conservation of the Historic Environment

National Planning Policy Framework (NPPF)

- 5.15 The NPPF sets out the Government's planning policies for England – at the heart of which is the 'presumption in favour of sustainable development'. The NPPF was revised significantly in December 2024 and included, amongst other key changes, the implementation of a new method of calculating annual housing need and amendments made to policy regarding housing land supply.
- 5.16 Relevant paragraphs from the NPPF to the application's assessment includes the following:
- **Paragraph 8** – sets out that achieving sustainable development relates to three objectives – namely, social, economic and environmental roles.
 - **Paragraph 10** – states that at the heart of the Framework is a presumption in favour of sustainable development.
 - **Paragraph 11** – states that, for decision taking, LPAs should apply the presumption in favour of sustainable development by:
 - “(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.

- **Footnote 7** – “The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park or defined as Heritage Coast; irreplaceable habitats; designated heritage assets; and areas at risk of flooding or coastal change”.
- **Footnote 8** – clarifies that in respect to whether a policy is out-of-date or not, for applications that involving the provision of housing, policies should be considered out of date where the local planning authority cannot demonstrate a five year supply of deliverable housing sites; or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.
- **Paragraph 61** – says that the Government’s objective is to significantly boost the supply of homes, by ensuring that a sufficient amount and variety of land comes forward where it is needed.
- **Paragraph 78** – requires that LPAs should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement, including the addition of an appropriate buffer.
- **Paragraph 96** – requires places to be healthy, inclusive and safe, promoting social interaction, ensuring that crime and disorder does not undermine the quality of life, and enabling and supporting healthy lifestyles, and enable and support health lifestyles – for example through the provision of sports facilities.
- **Paragraph 109** – outlines that transport issues should be considered at the earliest stages of producing development proposals, using a vision-led approach and development should, realise opportunities presented by existing and proposed transport infrastructure.
- **Paragraph 110** – makes it clear that significant development should be “focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”.
- **Paragraph 116** – says that development should only be refused on highways ground if the residual cumulative impact on the road network would be severe, or there would be an unacceptable impact on safety.
- **Paragraph 117** – requires development proposals to prioritise pedestrian and cycle movements over cars, as well as facilitating access to high quality public transport.

It also requires schemes to address mobility, create places that are safe, secure and attractive, allow for the delivery of goods, and enable charging of electric vehicles.

- **Paragraph 118** – requires travel plans to be provided where development would generate significant amounts of movement, with applications being supported by transport assessments.
- **Paragraph 124** – states that there should be an effective use of land to meet the need for homes and other uses.
- **Paragraph 131** – sets out that good design is fundamental to sustainable development.
- **Paragraph 135** – states the importance of ensuring that developments are visually attractive, add to the overall quality of the area, establish a strong sense of place, optimise the potential of a site, are sympathetic to local character, and create places that are safe, inclusive and accessible.
- **Paragraph 137** – sets out that design quality should be considered throughout the evolution of a scheme.
- **Paragraph 164** – states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change; and help to reduce greenhouse gas emissions through location, orientation and design.
- **Paragraph 170** – requires development to be located outside of areas which are at the highest risk of flooding.
- **Paragraph 187** – asks decisions to recognise the intrinsic character and beauty of the countryside and provide net gains for biodiversity.
- **Paragraph 198** – also requires applications and developments to ensure the likely effects of pollution on health, living conditions and the natural environment arising from the development are considered and mitigated for to minimum potential adverse effects.
- **Paragraph 195** – sets out that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (including cumulative effects), unless an appropriate assessment has been undertaken which has concluded that there will be no adverse effects.

Emerging National Planning Policy Framework

- 5.17 The Government’s proposed revisions to the National Planning Policy Framework (NPPF), published for consultation in December 2025, together with the accompanying Written Ministerial Statement (WMS), represent a clear and deliberate shift in national planning policy towards significantly boosting housing delivery in the most sustainable locations. Whilst the revised NPPF remains in draft form and therefore attracts limited weight at this stage, the trajectory of policy is both unmistakable and highly relevant to the consideration of the proposals at land north of Devizes Road.

- 5.18 In particular, the emerging policy framework places increased emphasis on addressing acute housing need and making more effective use of land at the edge of existing settlements.
- 5.19 The Written Ministerial Statement (WMS) made by the RtH Matthew Pennycook on the 16th December 2025, when launching the consultation on the proposed changes to the NPPF, sets a very clear tone and direction for national planning policy. It reaffirms the government's commitment to deliver 1.5m homes during the course of the current parliament and also sets out the stark statistics behind what is commonly termed the 'Housing Crisis':
- 1.3 million people languishing on social housing waiting lists;
 - Millions of low-income households forced into unaffordable private rented housing; and
 - More than 170,000 homeless children living in temporary accommodation.
- 5.20 The WMS also identifies the serious economic effects that not addressing the housing crisis has also caused, which are commonly overlooked.
- 5.21 The WMS is a material consideration that places greater emphasis on the imperative of dramatically boosting the supply of housing and the importance of achieving this to boost the national economy. This also reinforces the substantial weight that should be given to proposals which make a meaningful contribution to housing supply, particularly in areas where need is acute and delivery has fallen consistently short of targets.
- 5.22 Policy S5 applies to land that lies outside of settlements and sets out that permission should only be granted in such locations if that development falls within one of a range of categories. One of these categories, set out in the emerging policy, reads:
- "j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing ..., and where the development would:*
- i. be well related to an existing settlement ... and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;"*
- 5.23 The draft NPPF therefore places increased emphasis on directing development to locations that are well related to existing settlements and that support walking, cycling and public transport use. It explicitly promotes development at the edge of settlements where it can take advantage of existing services, facilities and infrastructure, thereby reducing the need to travel and supporting healthier, more sustainable communities.

- 5.24 Where a development meets policy S5, in that context, permission should be granted ‘*unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework*’.
- 5.25 Whilst the current NPPF clearly recognises the important role that large strategic sites can play in achieving the boost in housing supply that the Government wants to achieve, and importantly sustaining reliable and consistent levels of supply in the medium to long term (see paragraph 77 of the current Framework), the proposed changes add even more emphasis to their importance.
- 5.26 It is now proposed, as part of one of the six strategic policies that are put forward to underpin the aim of delivering the substantial increase in housing supply that the Government wants to engender, that land for ‘large-scale’ and mixed-use development should be specifically identified in an area’s Development Plan. Policy HO4 sets out the requirements for locations to meet this requirement which include:
- Be able to deliver suitable supporting infrastructure, with specific reference to the need for such development to take advantage by existing and planned infrastructure and also engender sustainable transport solutions;
 - Be located where unrealistic levels of self-containment do not need to be assumed;
 - Provide access to sufficient services and employment opportunities within the development itself; and
 - Addressing strategic environmental opportunities and safeguards.
- 5.27 The proposed changes to the NPPF also introduce a suite of policies which are specifically directed at the determination of planning applications for housing development, set out in policies HO7 to HO13.
- 5.28 Policy HO7 emphasises the importance of delivering a sufficient supply of homes and makes clear that substantial weight should be given to proposals which contribute positively to housing delivery, particularly where there is an identified shortfall or unmet need.
- 5.29 Policy HO8 reinforces the significance of meeting affordable housing needs, highlighting the expectation that housing proposals should respond to identified local requirements and contribute towards addressing affordability pressures.
- 5.30 Policy HO9 broadens the scope of housing considerations beyond conventional market housing, recognising the need to provide for a wider range of groups, including older people and those with disabilities. The policy supports the delivery of specialist accommodation and

accessible housing, including homes built to enhanced accessibility standards, in order to meet diverse housing needs.

- 5.31 Lastly, Policy HO13 is of particular relevance to large-scale and mixed-use housing developments which are likely to be delivered in phases. It sets out expectations for securing a consistent and high-quality design approach across the lifetime of such schemes, including the early establishment of overarching design principles. The policy also encourages consideration of planning conditions to ensure that development is implemented in a timely and coordinated manner.

6.0 PLANNING CONSIDERATIONS

6.1 With consideration of the previous reasons for refusal on part of the land, the public consultation and technical information, the key issues to consider are as follows:

- The need for market and affordable housing;
- Whether the site lies within an accessible location for development, and whether the principle of development is acceptable;
- The proposal's impact on ecology, and whether the proposals comply with the Trowbridge Bat Mitigation Strategy;
- The proposal's impact on highways;
- Whether the proposals make adequate provision for flood risk and drainage;
- The proposal's impact on trees; and
- Whether there are other material considerations that outweigh the benefits of the scheme.

6.2 A planning balance assessment is then undertaken, alongside consideration of compliance with the development plan, in Section 7 of this statement.

The Need for Housing

Market Housing

6.3 Wiltshire Council adopted their Core Strategy in 2015 and set an annualised requirement of 2,100 dwellings per annum. In 2020, the housing figures within that Core Strategy become over five years old and therefore out-of-date. The standard method for calculating housing need indicates an annual requirement of 3,525 dwellings per year.

6.4 WC are currently unable to demonstrate a five-year housing land supply (5YHLS), estimated to be 2.42 years according to the Council; this is equivalent to a deficit of 9,561 homes over the next five years (see figure 7 below).

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

Figure 7. Extract of 2024 AMR Report showing 5YHLS position

6.5 This means that there is insufficient housing proposed, allocated or permitted to meet five years' worth of housing need in WC. Proposals of this scale, subject to a timely permission, can be delivered within five years, particularly where there is already a housebuilder involved

(as opposed to an outline consent that is secured and then needs to be disposed on the open market).

- 6.6 According to WC, the latest Housing Delivery Test results indicates that the Council has met 135% of its housing targets over the previous three years. Notwithstanding this, when considering the annual housing requirement since the start of the plan period, and the housing need once the Core Strategy requirement became out of date in 2020, there is a deficit of over 1,200 homes against need to date, as shown by the table below. This will be exacerbated in the next five years if there are insufficient permissions to meet supply targets.

Table 1. Housing Requirement vs Delivery – Wiltshire

Year	Housing Req't	Housing Delivery	Surplus/Deficit
2006/07	2,100	2,071	-29
2007/08	2,100	2,662	+562
2008/09	2,100	1,885	-215
2009/10	2,100	1,657	-443
2010/11	2,100	2,077	-23
2011/12	2,100	1,779	-321
2012/13	2,100	1,725	-375
2013/14	2,100	2,249	+149
2014/15	2,100	2,118	+18
2015/16	2,100	1,746	-354
2016/17	2,100	2,690	+590
2017/18	2,100	2,428	+328
2018/19	2,100	2,699	+599
2019/20	2,100	1,799	-301
2020/21	1,981	1,926	-55
2021/22	2,041	1,862	-179
2022/23	1,952	2,425	+473
2023/24	3,525	1,825	-1,700
Total	38,899	37,623	-1,276

- 6.7 Furthermore, whilst WC have submitted their Local Plan which is currently at examination, this is based on a housing requirement of 36,740 dwellings across the plan period 2020 – 2038 (equivalent to 2,041 homes per annum). Whilst planning for this provision is considered to be acceptable under the transitional arrangements set out within the NPPF (as the Plan was submitted for examination before the 12th March 2025), the plan does not seek to meet housing requirements in full for those that are desperately in need of homes, and will be subject to an immediate review once adopted.

- 6.8 The Council are also anticipating a stepped housing requirement as follows:

Table 3.1 Housing requirement phasing			
	Pre-plan adoption (2020-2024)	Phase 1 (2024-2031)	Phase 2 (2031-2038)
Housing requirement (Additional dwellings)	8,080	10,290	18,370

Figure 8. Stepped Housing Requirement proposed in the Local Plan

- 6.9 The Inspectors who are examining the Local Plan have already indicated that a proposal to ‘step’ the housing requirement will not be considered acceptable, as it is *‘neither positively prepared nor justified’* and that this would *‘serve to unnecessarily delay meeting identified housing needs’* (Ref: ID12). As such, it is possible that the Council will need to reconsider its position on such matters, and consideration needs to be given to boosting housing supply within early stages of the plan period, which this application seeks to do by bringing forward a first phase of a large-scale allocation.
- 6.10 Accordingly, we consider that there is a significant need and demand for market housing across Bristol which is fuelled by a lack of supply in this area. As such, the proposals meet favourably with delivering a minimum need of 42,000 dwellings over the plan period in accordance with Core Policy 2.

Affordable Housing

- 6.11 The provision of affordable housing, and the related need, is a strong material consideration in respect of the assessment of this application – the scheme would provide policy compliant affordable housing at 30% (equivalent to 23 units, if the full balance of 80 homes is delivered at RM stage).
- 6.12 Information sought under a Freedom of Information Request to the Council has established that there are currently 3783 households on the waiting list seeking an affordable home in Wiltshire, with 448 number of households selecting Trowbridge as their preferred option.
- 6.13 The Housing Federation’s report “People in Housing Need” (September 2020) identifies that, while local housing registers serve an important administrative function, they do not give a full picture of how many people are in need of a home. This is because various factors suppress the numbers on formal registers including matters such as barriers to entry relating to people’s ability and knowledge to register their need formally with a Council, and feelings

related to the hopelessness of being able to secure a home in an area where little development that delivers affordable housing is occurring.

- 6.14 Housing need is also dynamic, and increases over time as people fall into housing need due to various factors including children growing into adulthood, couples separating, economic circumstances etc. The housing register figures should, therefore, be viewed as very much the minimum indication of need in the area. This identified need is also for rented affordable products only, there will be additional demand for other forms of affordable housing that a development would deliver such as first homes and shared ownership products. Determining the level of need for these products is notoriously hard as Council's rarely hold data for this, given applicants register with individual housebuilders/providers.
- 6.15 However, the Local Housing Needs Assessment (LHNA) which supports the emerging Local Plan (November 2024) indicates that currently there is a net affordable housing need of 2,301 households (paragraph 4.20 of the Wiltshire Local Housing Needs Assessment Update: Volume II¹). Between 2020 – 2038, the LHNA indicates that there is a total affordable housing need of 30,010 dwellings over the plan period (see figure 33 of the LHNA Volume II), equivalent to 1,667 dwellings per year. Of those 30,010 households, 7,062 are those that are unable to afford to rent or own market housing², with the remainder able to afford private rent but are aspiring to home ownership.
- 6.16 This is a significant number of households aspiring to own a home, as well as a significant number of households that are unable to afford private rent, and, if unprovided for, may result in an increase in the number of housing benefit claimants living in private rented housing increasing.
- 6.17 Data obtained from the Council indicates that in terms of affordable housing completions, there is a deficit of over 1,000 affordable homes delivered against the target set out in Core Policy 43 of 13,000 homes across the plan period (equivalent to 650 dwellings per annum) (see table 2 below). As such, boosting the supply of affordable homes, as soon as practically possible is therefore key to addressing this. Additionally, as set out, currently the Council can demonstrate a housing land supply equivalent to 2.42 years.

¹ https://www.wiltshire.gov.uk/media/12020/Wiltshire-Local-Housing-Needs-Assessment-Update-Vol-2-2022/pdf/Wiltshire_Local_Housing_Needs_Assessment_Update_Vol_2_2022.pdf?m=1695745989010

² Para 4.52 of Volume II LHNA (November 2024)

Table 2. Annual Affordable Need vs Net Delivery of Affordable Homes since 2009

Year	Annual Affordable Need	Net Delivery	Shortfall/Surplus
2009/10	650	564	-86
2010/11	650	648	-2
2011/12	650	626	-24
2012/13	650	711	+61
2013/14	650	645	-5
2014/15	650	635	-15
2015/16	650	412	-238
2016/17	650	433	-217
2017/18	650	593	-57
2018/19	650	752	+102
2019/20	650	621	-29
2020/21	650	556	-94
2021/22	650	688	+38
2022/23	650	643	-7
2023/24	650	532	-118
2024/25	650	319	-331
TOTAL	10,400	9,378	-1,022

- 6.18 Accordingly, there is a strong and well-defined need for affordable housing across Wiltshire and within Trowbridge; the scheme will deliver policy compliant affordable housing on site and therefore it is considered that the proposals meet favourably with policy 43 of the adopted Core Strategy.

Principle of Development

Accessibility

- 6.19 The site lies outside of the settlement boundary of Trowbridge, where the principle of development is not normally acceptable. However, the site does lie within an accessible location for development as demonstrated by the transport evidence prepared by Pegasus, which accompanies this application.
- 6.20 This demonstrates that the site is located within appropriate walking and cycling distance, and within bus journey time, of a number of local services and amenities located within Paxcroft Mead and Hilperton including a primary school, a children's nurse, a village hall and community centre.

6.21 The existing footway and cycle networks are considered to provide safe and appropriate pedestrian and cycle routes between the site and the local amenities and facilities, including bus stops and connections onto Trowbridge town centre.

6.22 As such, we consider that despite the site lying outside of the settlement boundary, the development would provide opportunities to travel via means other than the private car, with options of walking, cycling and utilising public transport available to reach everyday facilities.

6.23 This was also agreed as part of the previous application on a smaller part of the site, in which the officer's report comments:

'The closest convenient store is 1.6km from the site and the primary school and community centre are accessible by foot within 20 minutes. Within 500 metres of the site is the local bus stop (Paxcroft Farm and Helps Well Road). The Council's Highway Officer has confirmed that Trowbridge Rugby Club and existing housing, Paxcroft Farm employment site, cycle routes, the A361 route (including bus routes), Paxcroft Mead School and community facilities are all within reasonable distance.'

6.24 No objection was raised by the highways authority, and no reason for refusal relating to accessibility or sustainability was put forward as part of the Council's delegated decision-making process.

6.25 It should also be noted that, if and when the wider allocation comes forward as part of the Local Plan, this would provide (as currently suggested within policy) a new primary school, convenience store and other infrastructure to support everyday needs, which would be beneficial to both new and existing residents living within this locality.

6.26 Accordingly, we consider that the proposals comply with policies 60 and 61 of the Wiltshire Core Strategy in that they offer reasonable alternatives to travelling via private car and the site lies within an accessible location for development.

Settlement Boundaries & the Spatial Strategy

6.27 As set out, the site lies outside of the settlement boundary however for the reasons set out above, less weight should be applied to these boundaries and the policies connected to them. As demonstrated by the above, the site lies within an accessible location for development.

6.28 Furthermore, the site lies within/adjacent to Trowbridge, which is identified as a Principal Settlement within Core Policy 1, and identified as a *'strategically important centre and a primary focus for development'*, aiming to provide a significant level of jobs and homes. As

such, the provision of homes on the edge of these key settlements is compliant with the Spatial Strategy and the general thrust of Core Policy 1 which seeks to provide larger levels of development within these bigger settlements.

- 6.29 This spatial strategy is also being largely replicated within the new emerging Local Plan, which also identifies the Principal Settlements as Chippenham, Trowbridge and Salisbury, as they are considered to offer the best opportunities to support sustainable patterns of living. As set out in earlier sections of this statement, the site forms part of an allocation within the emerging Local Plan for 600 homes and therefore it is expected that the Council will want to support the first phase of this emerging allocation coming forward.
- 6.30 Accordingly, whilst there may be a technical conflict with Core Policies 1, 2 and 29 of the existing Local Plan, we do not consider that there would be any material harm arising from the delivery of the development given it lies adjacent to the settlement boundary on the edge of a strategically important centre (Trowbridge), and within an accessible location, where there is an opportunity to travel via means other than the private car (i.e. walking, cycling and utilising public transport).

Ecology

- 6.31 Policy CP50 of the Local Plan is the primary policy for consideration of ecological matters in Wiltshire, which is then supported by the Housing & Site Allocations Plan, and the Trowbridge Bat Mitigation Supplementary Planning Document (SPD).
- 6.32 Policy CP50 is clear regarding the following with respect to ecology:

“Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale... Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.... Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out ... otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.”

- 6.33 New site surveys that have been undertaken across the wider site, have been undertaken and an Ecological Impact Assessment (EclA) prepared by GE Consulting which should be read in conjunction with this statement.
- 6.34 The assessment is based on an extensive programme of ecological survey work undertaken between 2022 and 2025, including habitat surveys, protected species surveys and detailed bat activity and roost assessments, and has been carried out in accordance with relevant best practice guidance and policy requirements.
- 6.35 The surveys have identified that the site is dominated by improved grassland of limited intrinsic ecological value, together with boundary hedgerows, scattered trees and areas of scrub, all of which are common and widespread within the local landscape. No irreplaceable habitats are present.
- 6.36 Bats are identified as the key ecological consideration, reflecting the site's location within the consultation zone, and Yellow and Grey Zones for the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and the presence of low-level day roosting by small numbers of greater and lesser horseshoe bats within an existing building.
- 6.37 Development within the 'yellow zone' is expected to ensure there is 'no net loss' of bat habitat on site (demonstrated through the statutory Biodiversity Net Gain metric); that retained core bat habitat remains connected to the wider habitat and is adequately buffered; and that a financial contribution is made towards funding for mitigation for habitat loss.
- 6.38 The scheme has been designed to retain and enhance bat foraging and commuting habitat through the provision of a substantial dark corridor along the eastern boundary of the site (50m wide), significantly exceeding minimum guidance (which requires a minimum 15m buffer to be provided), alongside sensitive lighting controls. The submitted proposals also demonstrate that there is a 'no net loss' of habitat on site, and the applicants can confirm that the contribution requested via the SPD is acceptable. As such, it is considered that the proposals comply with the 'yellow zone' criteria set out.
- 6.39 Turning next to the 'grey zone', the guidance within the TBMS requires that sites of over 50 dwellings or more should provide a SANG / sufficient natural recreational focused greenspace, or contribute towards one. Sites of under 50 dwellings would be expected to contribute to SANG also. Mitigation is expected to be provided prior to first occupation of the site.
- 6.40 Whilst Appendix 1 of the TBMS indicates that a 30ha SANG should be provided as mitigation for recreational pressures, this would not be a proportionate or reasonable response as a

development of 50 dwellings would not have the same impact as a development of 300 dwellings. This is presumably why the TBMS also refers to 'sufficient natural recreational focused greenspace', and not just SANG.

- 6.41 Based on Natural England's guidance of 8 hectares per 1,000 population, at an average occupancy rate of 2.4 people per dwelling, 80 dwellings would require circa 1.5 hectares of greenspace to be provided on site or close by. Given other constraints (for example, the provision of an 18.3m wide corridor to serve the wider emerging allocation), a provision of circa 1 hectare has been provided in the form of the eastern buffer and other public open space on site. It is proposed that this greenspace is provided prior to first occupation to provide a realistic opportunity for residents to utilise this from the very beginning, which would also provide links out to the wider countryside including existing footpaths.
- 6.42 Furthermore, the applicants are willing to make a contribution of £925 per dwelling towards the wider SANG mitigation that is envisaged to come forward as part of the emerging Local Plan. This will be secured via s106 agreement.
- 6.43 It is therefore considered that the proposals put forward comply with the 'grey zone' mitigation required, with alternative recreational greenspace being available prior to first occupation of the scheme, with contributions also delivered to the wider SANG as and when that comes forward.
- 6.44 Based on the above therefore, the EclA confirms that, subject to appropriate mitigation, the development would not give rise to significant adverse effects on statutory or non-statutory designated sites. While the site lies within the consultation zone for the Bath and Bradford on Avon Bats Special Area of Conservation (SAC), detailed assessment demonstrates that potential effects can be adequately mitigated and that the proposals would not result in adverse effects on the integrity of the SAC, either alone or in combination with other plans and projects. A draft Shadow Habitat Regulations (HRA) Assessment has been undertaken and submitted to that effect.
- 6.45 Other protected and notable species, including nesting birds, badger, hedgehog and reptiles, have been considered, with appropriate avoidance and mitigation measures identified where required. The loss of the identified roosts would be mitigated through the delivery of a bespoke bat house and additional bat roosting features, secured via the necessary European Protected Species licensing process.
- 6.46 The EclA and BNG reports confirms that no further survey work is necessary and that, with the implementation of the proposed mitigation, compensation and enhancement measures, the development accords with national policy, the Wiltshire Core Strategy (in particular policy

CP50), and the objectives of the Environment Act 2021, including the delivery of a minimum 10% biodiversity net gain (which will be delivered in combination of on-site and off-site provision).

Highways

- 6.47 Transport matters have been carefully considered in the evolution of the proposed development, with the submitted Transport Assessment prepared by Pegasus demonstrating that the site is appropriately located in accessibility terms and can be safely and satisfactorily served by the local highway network.
- 6.48 The Transport Assessment confirms that the site benefits from a sustainable location, with a range of day-to-day services and facilities within walking and cycling distance, including schools, local centres, community facilities and bus stops along the A361 corridor. Frequent bus services provide connections to Hilperton, Paxcroft Mead, Trowbridge town centre and onward destinations, with Trowbridge railway station accessible by bus, cycle and car.
- 6.49 The proposed principal access from a new fourth arm of the A361 / Devizes Road roundabout has been demonstrated to be safe and suitable for all users. A Road Safety Audit has confirmed that no highway safety issues arise from the access arrangement (which was agreed by the highways authority as part of the previous application), and appropriate provision is made for pedestrians and cyclists through shared footway and cycleway connections and crossing facilities.
- 6.50 An assessment of personal injury collision data confirms that there is no existing pattern of highway safety concern within the vicinity of the site. Recorded collisions over the most recent five-year period are limited in number, with no evidence of clustering or causation that would be exacerbated by the proposed development
- 6.51 The forecast vehicle trip generation associated with up to 80 dwellings is modest in scale, equating to approximately 41 two-way vehicle movements in the AM peak hour and 36 in the PM peak hour. When assessed against existing and future baseline traffic conditions, including background growth to 2031, the development is not predicted to result in any material impact on the operation or capacity of the local highway network.
- 6.52 Junction capacity modelling undertaken demonstrates that the A361 / Devizes Road roundabout, including the proposed new site access arm, would continue to operate well within capacity in both peak periods, with no arms approaching or exceeding capacity thresholds. As such, the residual cumulative impacts of the development are not severe in transport terms.

- 6.53 The proposals are also supported by a Framework Residential Travel Plan, which seeks to encourage sustainable travel choices and secure a reduction in single-occupancy car trips through a package of physical, informational and promotional measures. This approach is consistent with the objectives of Wiltshire Core Strategy Core Policies 60, 61 and 62, which seek to reduce reliance on private car travel and promote sustainable modes of transport.
- 6.54 Overall, the Transport Assessment concludes that safe and suitable access can be achieved, the development is sustainably located, and there would be no unacceptable impact on highway safety or network operation (taking into account the future wider allocation of the site). The proposals therefore accord with the NPPF and with the development plan transport policies for Wiltshire, and there are no transport-related reasons why planning permission should be withheld.

Flood Risk & Drainage

- 6.55 A site-specific Flood Risk Assessment (FRA) and Drainage Strategy have been prepared by Rappor and accompany the application. These documents assess the risk of flooding to the site from all sources and set out an appropriate drainage strategy for the proposed development, in accordance with the National Planning Policy Framework, Planning Practice Guidance and Core Policy 67 of the Wiltshire Core Strategy.
- 6.56 The FRA confirms that the entirety of the site is located within Flood Zone 1, as defined by the Environment Agency Flood Map for Planning, and is therefore at low risk of fluvial flooding. There are no Environment Agency designated main rivers within or adjacent to the site, with the nearest watercourse (Paxcroft Brook) located approximately 750 metres to the south. The assessment further confirms that the site is at low risk from tidal, sewer, reservoir and canal flooding, and that there are no recorded historic flooding incidents affecting the site.
- 6.57 Environment Agency surface water flood mapping identifies only small, shallow and localised areas of surface water flooding (up to 0.2m depth) along parts of the eastern boundary, associated with minor topographical depressions. These areas are isolated, are not connected to wider flow routes, and lie outside of the proposed developable areas. Surface water flood risk across the site is therefore considered to be low, and no flooding is indicated at the proposed site access from Devizes Road.
- 6.58 The FRA also considers groundwater flood risk. Whilst groundwater was encountered during infiltration testing, and the Strategic Flood Risk Assessment identifies the wider area as having a potential for groundwater emergence, there are no recorded incidents of groundwater flooding affecting the site. The assessment concludes that groundwater flooding does not

present a constraint to the proposed development, subject to appropriate construction and drainage design measures.

- 6.59 Given that the site is wholly located within Flood Zone 1 and is at low risk from all sources of flooding, the Sequential Test is not required, and the Exception Test does not apply. The proposed residential development is considered appropriate in flood risk terms, and safe pedestrian and vehicular access and egress are available during extreme events via Devizes Road, which is also located within Flood Zone 1.
- 6.60 The Drainage Strategy has been prepared in accordance with national SuDS guidance and Wiltshire Council requirements. Infiltration testing undertaken across the site confirms that infiltration-based drainage is not feasible due to low infiltration rates and the presence of groundwater. As such, an alternative surface water drainage strategy has been developed.
- 6.61 Surface water runoff from the development will be managed through a combination of attenuation ponds and below-ground attenuation, with flows restricted to a greenfield equivalent rate with 30% betterment. The development will discharge surface water at a restricted rate of 2.95 litres per second, based on a discharge rate of 1.68 l/s/ha, ensuring that post-development runoff rates do not exceed existing greenfield conditions. Attenuation has been designed to accommodate the 1 in 100-year storm event plus 45% climate change allowance, with exceedance flows directed safely through the site in line with existing overland flow paths.
- 6.62 Surface water will ultimately discharge to the existing public surface water sewer network in Hilpert Drive, subject to detailed design and agreement with Wessex Water, who have confirmed that the proposed connection is acceptable in principle. Foul water will be drained separately via a gravity system to the existing public foul sewer, also subject to the necessary approvals.
- 6.63 Overall, the submitted FRA and Drainage Strategy demonstrate that the proposed development can be delivered safely without increasing flood risk on site or elsewhere. The proposals are therefore fully compliant with national and local planning policy relating to flood risk and drainage, and no technical objections are anticipated on flood risk grounds.

Trees

- 6.64 Trees and arboricultural matters have informed the proposed development from an early stage, supported by a BS:5837 compliant Arboricultural Impact Assessment and Arboricultural Method Statement prepared by David Jarvis Associates. The assessment

confirms that the site contains a mix of individual trees and tree groups, the majority of which are of low to moderate arboricultural value and are not subject to statutory protection.

- 6.65 Of the trees identified for removal to facilitate the development, approximately 82% are category 'C' trees, which are of limited arboricultural and amenity value and would not normally represent a constraint to development. A small number of higher-quality category 'A' and 'B' trees are unavoidably affected; however, higher-quality boundary and peripheral trees have been retained wherever possible to maintain the enclosed character of the site and provide effective landscape screening, in accordance with Wiltshire Core Strategy Core Policy 51 (Landscape).
- 6.66 The proposals are supported by a robust scheme of replacement tree planting, which will result in a net gain in tree cover across the site. New trees are proposed within public open space, along the principal access route and within private gardens, including specimen and avenue planting capable of reaching maturity without conflict with built form. This approach accords with Core Policies 52 (Green Infrastructure) and 57 (Ensuring High Quality Design and Place Shaping).
- 6.67 Detailed tree protection and construction measures are set out within the Arboricultural Method Statement to ensure the successful retention of trees during construction and into the long term. It is also noted that a previous planning application affecting the southern part of the wider site was assessed by Wiltshire Council's Arboricultural Officer, who raised no objection in tree terms, confirming that development in this location can be accommodated without unacceptable arboricultural harm. Overall, the proposals are considered acceptable in arboricultural terms and fully compliant with relevant Wiltshire policy.

Other Material Considerations

Design

- 6.68 Design is an integral component of sustainable development and has informed the proposals from the outset, in accordance with the National Planning Policy Framework and the National Design Guide. The design rationale for the scheme is set out in detail within the submitted Design & Access Statement prepared by Thrive Architects and is summarised below.
- 6.69 The proposed development has been shaped by a clear understanding of the site's context, constraints and opportunities, including its relationship with Devizes Road, the adjoining settlement edge of Hilperton, existing residential development to the west, and the wider landscape and ecological corridors to the east. The illustrative masterplan demonstrates a

coherent and legible layout, with a clear hierarchy of streets and spaces, strong frontage to key routes, and areas of public open space integrated throughout the site.

- 6.70 The layout responds positively to its edge-of-settlement location by creating a sensitive transition between the built form and the surrounding countryside. Development is arranged to minimise visual impact from the east, with lower densities and generous landscape buffers adjacent to the bat corridor and public right of way, whilst higher levels of enclosure and definition are provided along the primary street and entrance from Devizes Road to create a clear gateway into the site.
- 6.71 In architectural terms, the proposals adopt a traditional and contextual approach, taking cues from the established character of Hilperton and surrounding development. The illustrative appearance indicates a palette of materials including pale buff brickwork, weatherboarding and tiled roofs, with variations in scale, massing and detailing to create visual interest and avoid uniformity. Building heights are limited to a maximum of 2.5 storeys (at key intervals, with the rest of the development proposed at two storeys), ensuring the development remains proportionate and respectful of nearby residential properties and the wider landscape setting.
- 6.72 The scheme also places strong emphasis on the quality of the public realm. Tree-lined streets, green corridors, integrated sustainable drainage features and overlooked areas of public open space contribute to a well-landscaped environment that supports both visual amenity and biodiversity. Pedestrian and cycle connectivity has been embedded into the layout, linking the site to existing routes and encouraging movement through and around the development in a safe and attractive manner.
- 6.73 As this is an outline application, detailed matters of appearance, landscaping, layout and scale will be subject to future Reserved Matters submissions. However, the parameters established through the illustrative masterplan and Design & Access Statement provide a robust framework to ensure that a high-quality, policy-compliant development is delivered. Overall, the proposals are considered to accord with the design objectives of the development plan (including policies 30 and 57 of the CS) and national policy, and would result in a well-designed residential environment that responds positively to its context.

Energy

- 6.74 An Energy Statement prepared by Energist accompanies the application and sets out how the proposed development accords with Policy CP41 (Sustainable Construction and Low Carbon Energy) of the Wiltshire Core Strategy and relevant national policy. The strategy has been prepared in accordance with the principles of the energy hierarchy, prioritising reductions in energy demand before the incorporation of low and zero carbon technologies.

- 6.75 In summary, the proposals adopt a robust ‘fabric first’ approach, with the dwellings designed to meet or exceed current Building Regulations through high-performance building fabric, enhanced insulation levels, improved airtightness, high-performance glazing and energy-efficient lighting and services. These measures significantly reduce overall energy demand and provide a strong foundation for long-term operational efficiency.
- 6.76 Following demand-reduction measures, the development incorporates air source heat pumps to all dwellings to provide space heating and hot water, removing the need for on-site combustion of fossil fuels and supporting the transition to a low-carbon energy system. SAP modelling demonstrates that the proposed development would achieve a 68.4% reduction in regulated CO₂ emissions compared with the Approved Document Part L 2021 baseline, significantly exceeding minimum regulatory requirements and future-proofing the scheme in line with forthcoming changes to Building Regulations
- 6.77 In addition, the development will achieve an aspirational internal water consumption rate of 110 litres per person per day, alongside wider sustainability measures including electric vehicle charging infrastructure, sustainable transport connectivity and consideration of embodied carbon and climate change adaptation. As such, the proposals represent a comprehensive and policy-compliant approach to energy efficiency and sustainability, and accord fully with the objectives of the development plan including Policy CP41.

Landscape

- 6.78 Landscape considerations have been a key factor in the evolution of the proposed development, with the site’s relationship to the surrounding settlement edge, existing vegetation structure and local landscape character informing both the layout and scale of the proposals. The design has sought to respond positively to the site’s transitional location between the built form of Hilperton and the wider rural landscape.
- 6.79 The submitted Landscape and Visual Appraisal (LVA) assesses the proposals against the relevant landscape character context and identifies that the site lies within an established local landscape character area which is not subject to any national or local landscape designation. As such, the site is not afforded a heightened level of landscape protection, but nevertheless requires development to conserve and, where possible, enhance local character, in accordance with development plan policy.
- 6.80 The proposed development has been carefully designed to respect the existing settlement pattern, with built form contained to the western portion of the site and set back from more visually sensitive boundaries. The retention and reinforcement of existing hedgerows,

together with new structural landscape planting, provides a strong framework that integrates the development into its surroundings and softens views from the wider landscape.

- 6.81 The LVA identifies a range of representative viewpoints, including short-range views from nearby public rights of way and roads, as well as longer-distance views from the surrounding landscape. The assessment concludes that, during construction, there would be temporary minor adverse effects. However, following the establishment of the proposed landscape mitigation, effects reduce over time.
- 6.82 At Year 1 of operation, the majority of landscape and visual effects are assessed as minor adverse or neutral, reflecting the introduction of built form at the settlement edge. By Year 15, once mitigation planting has matured, effects are assessed as neutral overall, with the development read as a natural extension to the existing settlement and well contained within the landscape structure.
- 6.83 Importantly, the LVA confirms that there would be no significant adverse effects on the wider landscape character or on key visual receptors. Longer-distance views are either well screened by existing vegetation and landform or limited by the site's context adjacent to existing development, and the proposals do not result in unacceptable harm to landscape character or visual amenity.
- 6.84 Overall, the LVA concludes that the proposals have been sensitively designed and appropriately mitigated, resulting in an acceptable level of landscape and visual effect. The development therefore accords with Wiltshire Core Strategy Core Policy 51 (Landscape), which seeks to protect, conserve and where possible enhance landscape character, and Core Policy 57 (Ensuring High Quality Design and Place Shaping).

Heritage

- 6.85 An Archaeology and Heritage Assessment has been prepared by The Environmental Dimension Partnership Ltd and accompanies this application. The assessment considers the significance of designated and non-designated heritage assets within the site and its wider setting, together with the potential effects of the proposed development, in accordance with the NPPF and relevant development plan policies.
- 6.86 The assessment confirms that the site does not contain any designated heritage assets, as defined in Annex 2 of the NPPF. There are no listed buildings, scheduled monuments, registered parks or gardens, conservation areas or other designated heritage assets within the site itself. The site is also located outside of the Hilperton Conservation Area.

- 6.87 A number of designated heritage assets are located within the wider study area, including the Hilperton Conservation Area and a number of listed buildings within the historic core of the village. The Archaeology and Heritage Assessment concludes that the site does not form part of the setting of these designated heritage assets in any meaningful or contributory way, due to a combination of distance, intervening development, vegetation, landform and the established settlement pattern.
- 6.88 As such, the proposed development would not result in harm to the significance of any designated heritage assets, either directly or through changes to their setting. The proposals therefore accord with the statutory duties set out in sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with paragraphs 199 and 200 of the NPPF.
- 6.89 In terms of non-designated heritage assets, the Archaeology and Heritage Assessment identifies that the site has potential to contain archaeological remains, particularly of prehistoric origin. This conclusion is informed by desk-based research and supported by the results of geophysical surveys undertaken in 2022 and 2025, as well as trial trenching undertaken in the southern part of the site in 2022.
- 6.90 Importantly, the assessment concludes that while there is archaeological potential within the site, there is nothing identified that would preclude development. Any archaeological remains that may be present can be appropriately investigated, recorded and, where necessary, mitigated through a programme of further archaeological work secured by condition, in accordance with paragraph 205 of the NPPF.
- 6.91 The proposals therefore comply with Core Policy 58 of the Wiltshire Core Strategy, which seeks to ensure that designated and non-designated heritage assets are conserved and, where appropriate, enhanced. The proposals also accord with Core Policy 57, which requires development to respond positively to local character and context, and with Core Policy 67 insofar as it relates to the historic environment and landscape character.
- 6.92 In conclusion, the Archaeology and Heritage Assessment demonstrates that the proposed development would result in no harm to designated heritage assets and that potential effects on non-designated archaeological remains can be satisfactorily addressed through appropriately conditioned mitigation. As such, the proposals are fully compliant with the development plan and national planning policy in heritage terms.

Noise

- 6.93 The submitted Noise Assessment prepared by Entran demonstrates that the proposed development is acceptable in noise terms and accords with relevant national and local

planning policy, including Wiltshire Core Strategy Policies CP57 (Ensuring High Quality Design and Place Shaping) and CP58 (Ensuring the Conservation of the Historic Environment), which require development to provide a good standard of amenity for future occupiers.

- 6.94 The assessment is informed by site-specific noise monitoring and confirms that the prevailing noise environment is dominated by traffic on the A361 and Devizes Road. It concludes that internal noise standards and external amenity criteria can be achieved across the site using standard residential design measures, including typical insulated double glazing and attenuated trickle ventilation, with no requirement for bespoke mitigation or sealed windows.
- 6.95 As such, the development would not result in unacceptable noise impacts and would provide a satisfactory living environment for future residents, in compliance with Wiltshire planning policy.

Air Quality

- 6.96 In addition, an Air Quality Assessment was carried out by Entran to assess both construction and operational impacts of the proposed development on local air quality.
- 6.97 With regard to potential impacts during the construction phase, the Assessment concludes that only limited releases of dust are likely to be generated from on-site activities and that this impact can be effectively mitigated through the implementation of construction mitigation measures (included within the report). Therefore, the residual effects are considered to be negligible.
- 6.98 The report confirms that based on the size and location of the proposed development, construction related traffic flows are not predicted to be significant in terms of total emissions.
- 6.99 Entran conclude that it is not expected that future occupants of the proposed development will be exposed to unacceptable concentrations of pollutants. As such, the proposed scheme is considered to be suitable for its proposed end use and accordingly complies with Core Policy 55 of the Wiltshire Core Strategy.

Agricultural Land Quality

- 6.100 An extract of MAGIC Maps as shown below identifies the site to be Grade 3A agricultural land, which is considered to be Best and Most Versatile (BMV), albeit this is not the highest quality agricultural land (which is Grades 1 and 2). Paragraph 187 of the NPPF requires BMV land to

be avoided where possible, albeit it recognises that there may be wider sustainability implications that necessitate the use of this land.



Figure 9. Extract of MAGIC Maps showing the site as Grade 3a Agricultural Quality

- 6.101 The loss of this small area of BMV land (3.99 hectares), at the lower end of the scale, is considered to be a negligible/minor harm within the planning balance. Furthermore, Wiltshire Council are allocating this land, and indeed land to the north of this site as part of the emerging Local Plan, as a result of reviewing an extensive number of land and site options to inform the Local Plan process, which has been subject to Sustainability Appraisal testing. As such, the Council themselves must consider the loss of this land to be acceptable.

7.0 COMPLIANCE WITH THE DEVELOPMENT PLAN / THE PLANNING BALANCE

- 7.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan, unless other material considerations indicate otherwise. This is repeated within the NPPF, at paragraph 47.
- 7.2 Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development which means *‘approving development proposals that accord with an up-to-date development plan without delay’ (our emphasis)*.
- 7.3 However, as we have set out, the relevant policies which relate to housing are out-of-date due to a lack of five-year housing land supply (estimated at 2.42 years), which includes Core Policy 1, Core Policy 2 and Core Policy 29 – this has been confirmed in recent appeal decisions and accordingly less weight should be applied to these policies, and the ‘tilted balance’ under paragraph 11 of the NPPF applied.
- 7.4 Before proceeding to undertake the ‘tilted balance’, one must first consider strand (i) of paragraph 11(d) of the NPPF, which requires a decision maker to consider whether there are any areas or assets of particular importance which provides a strong reason for refusing the development proposed.
- 7.5 The site does not contain within it a habitats site, Site of Special Scientific Interest, Local Green Space, a National Landscape, a National Park, Heritage Coast, irreplaceable habitat, nor is the land at risk from flooding or contain any heritage assets.
- 7.6 In respect of habitats sites however, the site lies within proximity to the Bath and Bradford-on-Avon SAC and as such falls under the Wiltshire Trowbridge Bat Mitigation Strategy (TBMS) guidance and Habitats Regulation Assessment (HRA) process. Indeed, the previous application was refusal partially on the basis of a perceived lack of compliance with the TBMS, and therefore the HRA guidance, and accordingly, impact on the SAC could not be ruled out. As such, the authority considered that the ‘tilted balance’ was disapplied and permission should be refused.
- 7.7 As set out within the ecology section of this report, the revised ecological surveys required under the TBMS guidance have been taken into account, and mitigation planned accordingly for this purpose. It is considered that the proposals comply with the guidance and various policies set out within the Core Strategy, including policies 50 and 51.

- 7.8 As such, it is considered that part (i) of paragraph 11(d) is met. Therefore, only where the *‘significant and demonstrable’* adverse effects of the proposals outweigh the benefits, should planning permission be refused (i.e., the ‘tilted balance’).
- 7.9 We first consider the proposed benefits of the scheme, which are wide-ranging and substantial. This includes the following benefits of varying positive weight in favour:
- Provision of market housing (Substantial)
 - Provision of affordable housing (Substantial)
 - Delivering a road wide enough to accommodate a new bus link and the wider allocation coming forward (Moderate)
 - Off-site highways improvement works (Minor)
 - Provision of above policy-compliant open space (Minor)
 - Jobs in construction (Minor)
- 7.10 We have also examined other technical matters including highways, flood risk and drainage, heritage, landscape, design, trees, energy, and air quality, and have identified that no adverse effects would outweigh the benefits of the scheme, and the proposals comply with the development plan in this regard.
- 7.11 Turning then to the harms identified by the proposals, these would be as follows:
- Loss of Grade 3a BMV (Minor)
- 7.12 To assist in the assessment of the planning balance, in simple terms, we have listed out the identified benefits of the scheme on one side, with the adverse impacts identified on the other, as shown below:

Benefit	Weight
Provision of market housing	Substantial
Provision of affordable housing	Substantial
Delivering a road wide enough to accommodate a new bus link and the wider allocation coming forward (Moderate)	Moderate
Off-site highways improvement works	Minor

Weight	Adverse Effect
Minor	Loss of Grade 3a BMW

Provision of above policy-compliant open space	Minor

- 7.13 Overall therefore, we consider that the benefits of the proposals outweigh the adverse impacts of the scheme and the presumption in favour of sustainable development applies.

8.0 CONCLUSIONS

- 8.1 This Planning Statement has demonstrated that the proposed development of up to 80 dwellings at land north of Devizes Road, Hilperton represents a sustainable, deliverable and policy-compliant form of development. The proposals have been carefully designed having regard to the site's constraints and opportunities, the surrounding settlement context, and the requirements of the development plan and national planning policy.
- 8.2 The application site forms part of an emerging strategic allocation within the Wiltshire Local Plan for approximately 600 dwellings, and the principle of residential development has therefore been tested through the plan-making process, albeit it is recognised that this is yet to be tested at examination, and therefore appropriate weight to the emerging Local Plan is attributed accordingly.
- 8.3 The scheme would deliver substantial public benefits, including the provision of much-needed market and affordable housing, policy-compliant levels of affordable housing, new public open space, ecological enhancement and biodiversity net gain, and infrastructure to support sustainable transport, including a primary access capable of accommodating future bus provision. These benefits attract significant weight in the planning balance.
- 8.4 All technical matters have been robustly assessed and are supported by a comprehensive suite of technical evidence. The proposals have been demonstrated to be acceptable in ecological terms, including full compliance with the Trowbridge Bat Mitigation Strategy and the Habitats Regulations, with no adverse effects on the integrity of the Bath and Bradford on Avon Bats SAC. There are no technical objections in respect of highways, flood risk and drainage, landscape and visual effects, heritage, trees, noise, air quality, design or energy, and no material harm has been identified that would outweigh the benefits of the scheme.
- 8.5 Whilst the site lies outside the defined settlement boundary, relevant development plan policies are out-of-date due to the Council's inability to demonstrate a five-year supply of deliverable housing sites. In these circumstances, the presumption in favour of sustainable development applies. There are no policies or designations that provide a clear reason for refusal, and the minor and limited adverse effects identified – principally the loss of a small area of Grade 3a agricultural land – are clearly and demonstrably outweighed by the significant benefits of the proposals.
- 8.6 Overall, the development represents a sustainable extension to the settlement of Hilperton, accords with the spatial strategy for growth, and responds positively to both adopted and emerging planning policy. When assessed against the development plan as a whole, material

considerations, and the National Planning Policy Framework, the proposals are acceptable in planning terms and planning permission should therefore be granted.



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