



North of Seagry Road,
Great Somerford, Wiltshire

Planning Statement

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1 Introduction

- 1.1 Vision Planning is instructed by N Davies and E Turtle to prepare and submit an outline planning application for the *“erection of 8 self build dwellings, associated works and landscaping (access not reserved).”*
- 1.2 This Planning Statement is accompanied by the following reports and drawings:
- Drawings – BHPH Architects
 - Site Location Plan – ref 3919.P.100
 - Proposed Illustrative Site Layout – ref 3919.P.101 rev A
 - Parameter Plans – ref 3919.P.102
 - Existing Site Layout – ref 3919.P.103
 - Plot Parameters – P1-2 – ref 3939.P.104
 - Plot Parameters – P3-4 – ref 3939.P.105
 - Plot Parameters – P5-6 – ref 3939.P.106
 - Plot Parameters – P7-8 – ref 3939.P.107
 - Design and Access Statement (January 2026) – BHPH Architects
 - Transport Statement (February 2026) – Cole Easdon Consultants
 - Travel Plan Statement (February 2026) – Cole Easdon Consultants
 - Stage 1 Road Safety Audit (January 2026) – Cole Easdon Consultants
 - Flood Risk Assessment and Drainage Strategy (February 2026) – Cole Easdon (in two parts)
 - Interim Ecological Impact Assessment (February 2026) – Ethos Environmental Planning
 - Heritage Report (February 2026_ – Worlledge Associates
 - Archaeological Impact Assessment (February 2026) – Armour Heritage
 - Landscape and Visual Appraisal (January 2026) – LVIA Ltd
 - Arboricultural Impact and Mitigation Statement (January 2026) – Wadey Trees

2 Site Description and Development Proposal

- 2.1 The application site (“the Site”) is shown on the accompanying location plan, and is shown indicatively, edged red, at Figure 1 below.
- 2.2 It is 0.5 hectares in area.

Figure 1: Site location



- 2.3 The Site is located towards the south west of Great Somerford’s central crossroads, formed by Seagry Road, West Street, Top Street and Dauntsey Road.
- 2.4 At its closest point, the Site is approximately 75 metres from the Volunteer Inn, which is Grade II Listed.
- 2.5 To the south east of the Site are two new housing developments, described further in section 3.
- 2.6 The proposal is described in the drawings referred to in paragraph 1.2.
- 2.7 It is for 8 self build plots, meeting the statutory definition of Self-build and custom housebuilding plots.

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- 2.8 As described in the *Transport Statement*, vehicular access would be onto Seagry Road, towards the western boundary of the Site but outside the root protection area of the category A oak tree near to the Seagry Road frontage (T065 in the *Arboricultural Impact and Mitigation Statement (AIMS)*). The two poplars to the east of the oak (T063 and T064 in the *AIMS*) would be removed to enable the creation of the access.
- 2.9 Pedestrian access would be via a separate footway joining Seagry Road in the Site's south eastern corner. The footway is proposed to be extended along the northern side of Seagry Road, to a new crossing point demarcated with a dropped kerb and tactile paving, to link up to the existing footway on the southern side of Seagry Road. (See drawing ref 10524/202 rev C in the *Transport Statement*).
- 2.10 Drawings ref 10524/202 rev C also shows that adequate visibility is provided for motor vehicles and pedestrians.
- 2.11 The surface water drainage solution is described in the *Flood Risk Assessment and Drainage Strategy*. Essentially it involves sub base storage below the access road and driveways, discharging to an attenuation basin and then to the boundary ditch along the northern side of Seagry Road.
- 2.12 The proposal would retain a 5 metre buffer from the line of trees to the east of the site in order to retain commuting and foraging opportunities for bats, as set out in the *Interim Ecological Impact Assessment*.
- 2.13 Given that the dwellings would be self build and that the Site area is 0.5 hectares, the development would be exempt from biodiversity net gain requirements.

Figure 3: Approved Planning Layout and Location Plan



3.6 The appeal Inspector's conclusions were, in summary:

- In relation to the Council's first reason for refusal, re the site being in open countryside and so contrary to the Core Strategy and Neighbourhood Plan in principle – the site's development would conflict with the Core Strategy's spatial strategy, although not with the Neighbourhood Plan, because *"...there are no policies within the GSNP which explicitly prohibit residential development at the appeal site."* This means that the proposal conflicts with the development plan when read as a whole.
- In relation to the Council's second reason for refusal, re the site being in an area with limited local facilities – *"... the site is a suitable location for the development having regard to the accessibility of services and facilities..."* because Great Somerford *"...contains a fair number of services and facilities, many of which are within an easy, short walking distance from the site."* Other needs would be met further afield, and bus services are limited, but the NPPF *"...recognise(s) that sustainable transport solutions will vary between urban and rural areas..."*, and the *"...the scheme is accompanied by a Travel Plan that would provide measures to help reduce the need to travel, particularly by private car. Moreover, a sustainability statement setting out energy efficiency measures, such as electric vehicle charging points, could be secured*

by a condition."

- In relation to the Council's third reason for refusal, re urbanisation of a rural site – *"...the proposed development would have an acceptable effect on the character and appearance of the area..."* because:
 - *"...The appellant's landscape evidence demonstrates that the scheme would be well screened from the majority of public viewpoints around and within the village by this housing and by intervening greenery, including that which lines Seagry Road..."*
 - From the nearby public right of way, as this edge of Great Somerford is already developed *"...The proposed development would effectively replicate the existing relationship between the settlement and its rural edge, albeit the interface of that relationship would be brought a short distance further to the south."*
- In relation to the Council's fourth reason for refusal, re there being no S106 agreement dealing for affordable homes or other financial contributions, the appellant provided a Unilateral Undertaking which responded to this.
- In relation to other relevant matters, the Inspector noted that:
 - *"The public highway network into and out of the village is typically rural and attracts typical rural recreational and business uses. However, there is no substantive evidence that the road network is under any severe strain at the moment or would be when the cumulation of prospective developments around the village, including this scheme, are taken into account."*
 - *"...(T)here is no specific evidence that the sewer network would be unable to accommodate the additional households."*
 - *"An issue is referenced with regard to the Primary School, but I understand it has been resolved."*
 - *"The separation distances would ensure that the proposed houses would have an acceptable effect on the living conditions of existing residents with reference to light, outlook and privacy."*
 - *"Biodiversity net gain is deliverable within the scheme."*
- The Inspector then noted that Wiltshire Council could only demonstrate

4.7 years housing land supply against a 5 year requirement, so the tilted balance was engaged and the balance was as follows:

- Benefits of new housing, *"...including a mixture of family sized housing and locally needed affordable housing..."* – substantial weight.
- Economic benefits – significant weight.
- *"...(T)he conflict with development plan and modest loss of high-grade farmland would not significantly and demonstrably outweigh the benefits..."*

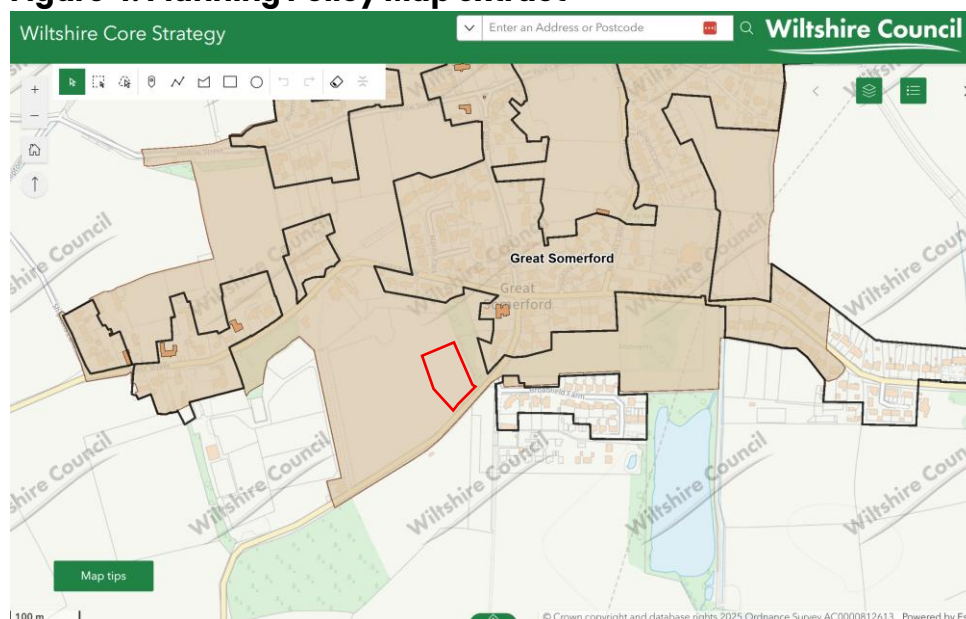
4 Relevant planning policy context

- 4.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and section 70 (2) of the Town and Country Planning Act 1990 require planning applications to be determined in accordance with the adopted development plan unless material considerations indicate otherwise.
- 4.2 The most relevant current adopted development plan documents for the application Site comprises the Wiltshire Core Strategy, adopted January 2015, and the Great Somerford Neighbourhood Plan 2016-2026, made November 2017.
- 4.3 The emerging Wiltshire Local Plan has now been submitted for examination, so has some limited weight in planning decisions.
- 4.4 Other material considerations include the National Planning Policy Framework.

Development Plan

- 4.5 Figure 4 below is an extract from Wiltshire Council's interactive planning policy mapping. It shows that the Site, edged red, is:
- Outside but adjoining the settlement boundary (black line)
 - Within the conservation area (lighter brown shading) and relatively near to a listed building (darker brown shading) – the Volunteer pub.

Figure 4: Planning Policy Map extract



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- 4.6 On the basis of the Policies Map, and the policies considered to be important in the determination of the Broadfield Farm applications referred to in section 3, the most relevant policies are listed below.
- 4.7 Core Policy 1: Settlement Strategy defines a hierarchy of settlements across Wiltshire, and explains the role that each level of settlement is intended to play in that hierarchy.
- 4.8 Great Somerford is defined as a Large Village. Core Policy 1 notes the following in that regard.

Large and Small Villages

Large Villages are defined as settlements with a limited range of employment, services and facilities. Small Villages have a low level of services and facilities, and few employment opportunities.

Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.

- 4.9 Core Policy 2: Delivery Strategy sets Wiltshire's housing requirement between 2006 and 2026 of "*at least 42,000 homes*".
- 4.10 Core Policy 2 also defines Great Somerford as being within the North and West Wilts Housing Market Area, which has a housing requirement of 24,740 dwellings between 2006 and 2026.
- 4.11 Core Policy 43: Providing Affordable Homes requires the provision of 40% affordable housing on housing sites of five or more dwellings in Great Somerford.
- 4.12 The following more generic policies are also likely to be considered relevant in the determination of this application. The extract below are the most relevant parts of those policies.

Core Policy 50

Biodiversity and geodiversity

Protection

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. 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.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, 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.

Biodiversity enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Core Policy 51

Landscape

Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.
- ii. The locally distinctive character of settlements and their landscape settings.
- iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.
- iv. Visually sensitive skylines, soils, geological and topographical features.
- v. Landscape features of cultural, historic and heritage value.
- vi. Important views and visual amenity.
- vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.
- viii. Landscape functions including places to live, work, relax and recreate.
- ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.

Core Policy 57

Ensuring high quality design and place shaping

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

- i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced
- ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development
- iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting
- iv. being sympathetic to and conserving historic buildings and historic landscapes
- v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy)
- vi. making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area
- vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the

consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)

- viii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site
- ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network)
- x. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials
- xi. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future
- xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm
- xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place
- xiv. meeting the requirements of Core Policy 61 (Transport and New Development).

Core Policy 58

Ensuring the conservation of the historic environment

Development should protect, conserve and where possible enhance the historic environment.

Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:

- i. nationally significant archaeological remains
- ii. World Heritage Sites within and adjacent to Wiltshire
- iii. buildings and structures of special architectural or historic interest
- iv. the special character or appearance of conservation areas
- v. historic parks and gardens
- vi. important landscapes, including registered battlefields and townscapes.

Distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).

Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.

4.13 The Great Somerford Neighbourhood Plan includes no additional policies that directly affect the Site.

4.14 This Neighbourhood Plan was made in November 2017, which is significant in terms of the weight to be given to it in the context of paragraph 14 of the NPPF below.

Other Materials Considerations

4.15 The current National Planning Policy Framework, published in December 2024, includes a number of relevant considerations.

- 4.16 Paragraph 11d, along with footnote 8, explains that where a local planning cannot demonstrate a 5 year housing land supply then the “tilted balance” set out in 11dii applies, along as it is not disapplied by the factors in 11di.

11. Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

[...]

For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance⁷ 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 combination⁹.

⁶ As established through statements of common ground (see paragraph 28).

⁷ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

⁸ This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); 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. See also paragraph 232.

⁹ The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.

- 4.17 Wiltshire Council concluded in its latest Housing Land Supply Statement (*Briefing Note 25-04*, June 2025) that it could only demonstrate 2.42 years of housing supply – well below the 5 year requirement.

Summary

We have now completed the update to Wiltshire’s housing land supply position. The current position is a **2.42 years** supply using a base date of 1 April 2024. This will be used to inform decision-taking of planning applications and appeals.

- 4.18 Paragraph 14 explains the scenario in which a made Neighbourhood Plan can affect the application of the tilted balance:

14. In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).

4.19 The fact that the Neighbourhood Plan was made more than 5 years ago means that the Neighbourhood Plan does not itself tilt the balance against the development proposal.

4.20 As the Site lies within Great Somerford's conservation area, the NPPF's heritage policies will also be important considerations. The most relevant of these are set out below.

207. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

4.21 The draft NPPF, released in December 2025, is also capable of being a material consideration¹, although we note that the associated *"Proposed reforms to the National Planning Policy Framework and other changes to the planning system"*, released alongside the draft NPPF, says:

"It is proposed that the Framework would be a material consideration from the day of publication of the final version. This means, as has been

¹ Cala Homes (South) Ltd v Secretary of State for Communities and Local Government [2011] EWHC 97 (Admin)

the case in previous versions of the Framework, that the policies of the revised Framework will need to be taken into account when making decisions from that date.”

4.22 In any event, the likelihood is that this application will be determined after the new NPPF has been finalised, so we include the most relevant draft National Decision-Making Policies below.

4.23 Policy S3 sets out the presumption in favour of sustainable development, and cross refers to policy S4 for developments within settlements and policy S5 for developments outside settlements.

S3: Presumption in favour of sustainable development

1. Decisions on development proposals should apply a presumption in favour of sustainable development. This means:
 - a. Policy S4 in this Framework should be applied when considering development proposals within settlements;
 - b. Outside settlements, policy S5 should be applied; and
 - c. In all locations, development proposals that accord with an up-to-date development plan and also the decision-making policies in this Framework should be approved without delay.

4.24 The Glossary at Annex B defines a “Settlement” as follows:

Settlement: Includes cities, towns, villages and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the development is complete. This includes areas defined as a settlement in the development plan (whether using defined settlement boundaries or equivalent terms, or criteria for identifying settlement extents). Settlements do not include hamlets and scattered groups of houses located outside predominantly built-up areas, unless specifically defined as a settlement in the development plan.

4.25 In general terms, there is a case to make that a site adjoining, but outside, a settlement would be within a settlement such that policy S4 applies, in the same way that a site in a Small Village with no settlement boundary may well still be within a settlement. However, this is largely academic because, whether the site is within or outside a settlement, the tilted balance applies.

4.26 If policy S4 applies on the basis that the site is within a settlement, then S4 1. sets out the equivalent of the current 11 d) ii. tilted balance, only disapplied by the limited factors in S4 2., none of which apply to this proposal.

S4: Principle of development within settlements

1. Development proposals within settlements should be approved 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.
2. In applying policy S4, the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include (but are not restricted to) situations where the development proposal would:
 - a. Have an unacceptable impact in relation to:
 - i. the allocation or safeguarding of land for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or
 - ii. the application of the policies in this Framework for safeguarding existing open space, sport and recreation facilities (HC7), Local Green Space (HC8), designated wildlife habitats (N6) and for managing development within residential curtilages (L2); or
 - b. Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made which does not increase the risk of flooding either on or off-site); or
 - c. Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.

- 4.27 If policy S5 applies on the basis that the site is not within a defined settlement boundary, then S5 1. j. sets out the equivalent of the current 11 d) ii. tilted balance, with S5 2. disapplying the tilted balance in a similar way to 11. d) i. now.

S5: Principle of development outside settlements

1. Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, 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:
 - a. Development proposals which are for: agriculture, horticulture and forestry; outdoor sport and recreation; allotments; cemeteries and burial grounds; mineral extraction; engineering operations and infrastructure (including for transport, energy and water); roadside facilities in accordance with policy TR5; and national defence and security;
 - b. Development for rural businesses and services, including tourism, where a location outside settlements is shown to be necessary;
 - c. The re-use, extension, alteration or replacement of an existing building, so long as the existing building is of permanent and substantial construction, and any extension or alteration will not result in a disproportionate increase in size compared to the existing building²⁴;
 - d. The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential);
 - e. Limited infilling within groups of houses;
 - f. An exception site as provided for in policy HO10, or development brought forward under a Community Right to Build Order or Neighbourhood Development Order;

-
- g. Development which would address an evidenced unmet need for gypsy, traveller or travelling showpeople accommodation²⁵, provided it meets the criteria in policy HO12;
 - h. Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services²⁶; physically well-related to a railway station or a settlement within which the station is located; is of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and where the development would not prejudice any proposals for long-term comprehensive development in the same location;
 - i. The development of land allocated for that purpose in the development plan (where this lies outside settlements); and
 - 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 sites²⁷ or scores below 75% in the most recent Housing Delivery Test²⁸), and where the development would:
 - i. be well related to an existing settlement²⁹ (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or
 - ii. comprise major development for storage and distribution purposes which accords with policy E3.
2. In applying this policy, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.
 3. Development proposals comprising isolated homes, which are those lying outside settlements or groups of houses, should not be approved other than in accordance with policy HO11.
 4. Any other development proposals which do not fall within one of the categories set out above should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.
 5. The preceding parts of this policy do not apply to development proposals in the Green Belt or on land designated as Local Green Space, which should instead be determined in accordance with policies HC8, GB6, GB7 and GB8. However, where development is not inappropriate in the Green Belt (as set out in policy GB7), proposals should also be approved 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.

4.28 Policy S6 reflects paragraph 14 in the current NPPF.

S6: Neighbourhood plans and the presumption

1. For development proposals involving the provision of housing, the benefits of approving development are likely to be substantially outweighed by the adverse effects where a proposal would conflict with a neighbourhood plan, provided the following apply:

-
- a. The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
 - b. The neighbourhood plan contains allocation to meet its identified housing requirement (see policy HO2).

4.29 Policy HO7 explains that substantial weight should be given to the benefits of providing homes that contribute to an evidenced need, including a lack of 5 year housing land supply:

HO7: Meeting the need for homes

- 1. In applying the policies in this Framework, substantial weight should be given to the benefits of providing accommodation that will contribute towards meeting the evidenced needs of the local community, taking into account any up-to-date local housing need assessment, and other relevant evidence (including the extent to which there is a five year supply of deliverable housing and traveller sites, and performance against the Housing Delivery Test).

4.30 Policy HO8 relates to the provision of affordable homes:

HO8: Providing affordable homes

- 1. Development proposals should meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures relevant to the location, including the minimum proportion of Social Rent. This should be provided on-site unless:
 - a. Off-site delivery on an alternative nearby site would optimise the quality or quantity of homes built; or
 - b. A cash payment in lieu of on or off-site provision can be justified robustly, and the agreed approach contributes towards the objective of creating mixed and balanced communities.
- 2. Development proposals that include military affordable housing should not be required to meet development plan requirements for the mix of affordable housing tenures (including the minimum proportion of Social Rent). These proposals should:
 - a. Demonstrate an evidenced unmet need for military affordable housing (as provided by the Ministry of Defence); and
 - b. Meet development plan requirements for the proportion of affordable housing on the site. This includes where military affordable housing is the only form of affordable housing provided, or where military affordable housing is delivered alongside other tenures of affordable housing.
- 3. Where development proposals meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures, including the minimum proportion of Social Rent properties, a flexible approach should be taken to the application of any development plan requirements relating to the size of market homes, taking into account prevailing market conditions.

4.31 It is notable in this regard that “*up-to-date development plan requirements*” are set out in plan making policy HO5 (extract only below), and include a reference to affordable housing only being required as part of major development.

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- 4.32 Policy HO5 also requires the identification of sites to meet the need for self and custom build housing.

HO5: Meeting the needs of different groups

1. The development plan should, at the most appropriate level, set out policies to address the housing needs of different groups assessed under policy HO1. This should include:
 - a. In relation to affordable housing:
 - i. setting requirements for the type and mix of affordable housing (applying the definition in Annex B) required to meet identified local needs, including the minimum proportion of Social Rent homes required, as part of major development. In Designated Rural Areas, development plans may set affordable housing requirements for residential developments which are not major development; and
 - ii. setting a specific affordable housing requirement (or requirements) for major development involving the provision of housing on land which is proposed to be released from the Green Belt, or which may be approved on land within the Green Belt³².
 - b. In relation to accessible housing, setting out the proportion of new housing that should be delivered to requirement M4(2) and M4(3) of the Building Regulations. M4(2) requirements should reflect local levels of need, and should ensure that at least 40% of new housing delivered over the course of the plan is delivered to M4(2) or M4(3) standards.
 - c. Identifying sites, or setting requirements for parts of allocated sites, which can provide specific types of housing where there is an identified need, including (but not limited to):
 - i. specialist housing for older people;
 - ii. purpose-built accommodation for students;
 - iii. plots for self and custom build housing; and
 - iv. sites suitable for gypsies and travellers and travelling showpeople, including sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. Sites identified for travelling showpeople should have regard to their need for mixed-use yards with both residential accommodation and space for storage of equipment.
 - d. Setting out policies for the mix of tenures to be provided on sites for 150 homes or more. This mix should be informed by the needs of different groups assessed under policy HO1.

- 4.33 Based on the definition of “*major development*” in the NPPF’s glossary, this application is not for major development, so there is no need for this application to provide affordable homes. This reflects Paragraph: 023 Reference ID: 23b-023-20190901 of the current Planning Practice Guidance.

- 4.34 Policy HE6 and HE9 are relevant given the Site’s location within a conservation area.

HE6: Proposals affecting designated heritage assets

1. When considering the potential effect of a development proposal on a designated heritage asset, substantial weight⁷⁴ should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.
2. Development proposals which would have a positive effect on designated heritage assets should be approved.
3. Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term re-use of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.
4. Where a development proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the development is necessary to achieve substantial public benefits that outweigh the harm or loss, or if all of the following apply:
 - a. The nature of the heritage asset would otherwise prevent all reasonable uses of the site; and
 - b. No suitable use for the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is not possible; and
 - d. The harm or loss is outweighed by the benefit of bringing the asset back into use.
5. Within this context, development which would cause substantial harm to, or the total loss of, the significance of grade II listed buildings, or grade II registered parks or gardens, should be exceptional; while development which would cause substantial harm to, or the total loss of, assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional⁷⁵.

HE9: Conservation areas

1. Development proposals within or affecting the significance of conservation areas should:
 - a. Retain and restore buildings and other features which make a positive contribution to the character or appearance of a conservation area wherever possible; and
 - b. Consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development.
2. Not all elements of a conservation area will necessarily contribute to its significance. Where a development proposal would result in the loss of a building or other element which contributes to the character or appearance of a conservation area that is desirable to preserve or enhance, the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole, and the effects of this considered in accordance with policies HE5 and HE6.
3. Proposals that preserve those elements of a conservation area that make a positive contribution to it (or which better reveal its significance) should be approved.

5 Planning Balance

Principle

- 5.1 In our view, while this proposal is likely to conflict with Core Policies 1 and 2 because the Site is outside the defined settlement boundary of Great Somerford, other material considerations outweigh this in principle conflict to such an extent that this application should be approved.
- 5.2 The “tilted balance” set out in paragraph 11 d) ii. of the NPPF applies because:
- Wiltshire cannot demonstrate a five year supply of deliverable housing sites. According to footnote 8 of the NPPF, this means that “...the policies which are most important for determining the application are out of date”;
 - the only “...areas or assets of particular importance...” potentially affected by this development proposal are heritage assets, and the application of NPPF policies relating to heritage assets does not provide “...a strong reasons for refusing the development proposed...”. We explain this conclusion at paragraphs 5.15 to 5.18 below.
- 5.3 Therefore, NPPF 11 d) ii. explains that permission should be granted unless “...any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in (the NPPF) taken as a whole.”
- 5.4 NPPF paragraph 14 explains that, in some circumstances, the Great Somerford Neighbourhood Plan may have been “likely to significantly and demonstrably outweigh the benefits”, but not where the neighbourhood plan is more than 5 years old. The Great Somerford Neighbourhood Plan was made in November 2017, so is significantly more than 5 years old, so this does not provide additional protection.
- 5.5 Additionally, as we note at paragraph 3.6, the Inspector who considered the appeal across Seagry Road from the Site concluded that the appeal proposal was not in conflict with the Neighbourhood Plan because it contains no policies which explicitly prohibit residential development at the appeal site, and the same would be the case with this application and this Site.
- 5.6 We demonstrate below that the adverse impacts of this proposal do not

significantly and demonstrably outweigh the benefits, so permission should be granted.

Housing Delivery

- 5.7 The proposal would deliver 8 new homes in an area with a housing shortfall, and these homes would be self-build.
- 5.8 Policy HO7 of the December 2025 draft NPPF explains that *“substantial weight should be given to the benefits of providing accommodation that will contribute towards meeting the evidenced needs of the local community...”*
- 5.9 While the draft NPPF is not yet finalised, it is a material consideration. In any event, even before the draft NPPF had been released, appeal Inspectors were giving the delivery of housing substantial² or significant³ weight in appeal decisions in Wiltshire.
- 5.10 In our view, therefore, the delivery of new homes must be given **substantial positive weight** in the planning balance.

Self-Build

- 5.11 The application proposes to deliver 8 self build plots.
- 5.12 Under the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), local planning authorities have a *“Duty to grant planning permission etc”, i.e. to “give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority’s area arising in each base period.”*
- 5.13 The table at paragraph 1.13 of the *Design and Access Statement* demonstrates that Wiltshire Council has not given sufficient planning permissions to meet this duty, and this is further confirmed by the following:
- Appeal reference APP/Y3940/W/23/3317252, for 26 self build dwellings at Land to the East of Waitrose, Malmesbury. This appeal was allowed on 9 March 2024, and the Inspector noted that:

“... the Council has not satisfactorily demonstrated that it has granted

² E.g. APP/Y3940/W/25/3367502, APP/Y3940/W/24/3353040 and APP/Y3940/W/24/3348374

³ E.g. APP/Y3940/W/25/3359108, APP/Y3940/W/24/3353055, APP/Y3940/W/24/3352160, APP/Y3940/W/24/3349801, APP/Y3940/W/24/3349828 and APP/Y3940/W/24/3351265

enough permissions to meet the demonstrated demand for self-build development in its area, and the level of self-build delivery in its area is far worse than that suggested by its data.

Given what would appear to be a considerable level of under deliverability against a high level of demand for self-build development, I find that I should give substantial weight to the self-build nature of the proposal. The delivery of such is a clear public benefit that attracts significant weight in the heritage balance."

- Appeal reference APP/Y3940/W/25/3361696, for 3 to 4 self build dwellings at Land at Tiddleywink, Yatton Keynell. This appeal was dismissed on 3 September 2025, but in relation to self building housing, the Inspector noted that:

"The main parties agree that there is an unmet need for self-build and custom house building (SBCH) plots, and the Council does not dispute that it is failing to meet its statutory duty under The Self-Build and Custom Housebuilding 2015 Act (as amended) in relation to provision of SBCH."

- Application reference PL/2024/11637, for a self build dwelling at Land to the south of B4042, Long Goss, Little Somerford, considered by the Northern Area Planning Committee on 2 July 2025. The committee report notes that:

"As well as providing a definition for SCH, the SBCH Act also places a duty on LPAs to provide a certain number of SCH per year... The Council has met part of the demand in base period 6, however, the demand in base periods 7 to 9 is wholly unmet to date. Therefore, based on the cumulative demand, the Council has a significant undersupply..."

- 5.14 On that basis, the delivery of 8 self build dwellings should be given **substantial positive weight**, as is the case with the Malmesbury appeal referred to above. This is in addition to the substantial weight to be given to housing delivery generally.

Heritage

- 5.15 The accompanying *Heritage Report* notes the lack of a Conservation Area Appraisal to enable the significance of the Conservation Area to be understood, and notes that the Neighbourhood Plan identifies only the tree lined avenue as having heritage significance, not the remainder of the Manor House's former parkland.

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- 5.16 On that basis, the *Heritage Report* concludes that:
- *“The significance of the tree lined avenue and the qualities of its approach to the Manor House would be preserved;*
 - *The existing setting of the Manor House would be preserved;*
 - *Subject to suitable landscaping and detailed matters of design and siting the proposed development would integrate with the overall character of the village and not result in harm.*
- Should it be considered that the development would result in harm, then it can only be concluded that this harm would derive from the development of part of the former parkland. Given the evidence above it would be reasonable to conclude that this harm, which would be at the bottom end of the scale of less than substantial could be minimised by design and landscaping.”*
- 5.17 Therefore, there is some doubt about whether the proposal would result in any heritage harm, partly because landscaping and detailed design could mitigate any impacts. However, if there is any residual heritage harm, this harm would be at the bottom end of less than substantial.
- 5.18 While heritage impacts need to be given great weight, this impact is only **minor negative at worst**.
- 5.19 If the Local Planning Authority considers the proposal to result in heritage harm then, according to paragraph 215 of the NPPF, any harm must be balanced against public benefits. As we explain above and below, the public benefits are:
- The delivery of housing in an area with a significant housing shortfall
 - The delivery of self build homes in an area with a significant shortfall
 - Arboricultural enhancements
 - Surface water drainage enhancements
- 5.20 On that basis, the internal heritage balance supports the approval of the application, so there is no heritage reason to refuse the application, and also no strong reason to disapply the tilted balance in paragraph 11 d) ii of the NPPF.

Transport and Access

- 5.21 Given the proximity of the Site to the appeal site referred to at paragraph 3.4, and to the appeal Inspector's conclusion that the appeal site *"...is a suitable location for the development having regard to the accessibility of services and facilities..."*, then the Site must also be considered to be a suitable and accessible location for development.
- 5.22 The *Transport Statement* demonstrates that the Site can be safely accessed, both by motor vehicles and pedestrians, so there is no reason to refuse the application in this regard.
- 5.23 For these reasons, transport and access impacts are **neutral**.

Ecology

- 5.24 The accompanying *Interim Ecological Impact Assessment* ("EcIA") concludes that with mitigation relating to the timing and methods of construction, significant residual effects on most protected species will be avoided.
- 5.25 In relation to bats, the EcIA notes that the proposed layout would retain a 5 metre buffer to the site's east to support foraging and commuting bats, and that *"Although there will be a loss of grassland foraging habitat, replacement habitat within open space and the SuDS feature, alongside protection of commuting corridors, ensures no significant adverse effects on bats, including Annex II species."*
- 5.26 However, further surveys in relation to bats and great crested newts are required, and will be undertaken during spring 2026, with an addendum report then submitted to provide a definitive review of impacts on these two species.
- 5.27 The final EcIA may or may not conclude that the proposal would result in harm to biodiversity. However, if it does conclude harm, this is unlikely to be significant, to the extent that NPPF paragraph 193 a) suggests it should be refused.

Landscape

- 5.28 The accompanying *Landscape and Visual Appraisal* explains that:
- *"The overall weighted level of landscape effect can be considered moderate (i.e. not a material change).*

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- *The visual impact and the significance of the impacts of the development on the open countryside have been assessed as potentially major/moderate (i.e. a material change) without mitigation from viewpoints 5 and 6 that follow a section of footpath GSOM6."*
- 5.29 The *Appraisal* recommends mitigation measures to include screening of the development from the west and concludes, on the basis of that mitigation, "... the development will have a moderate visual impact and a minor landscape impact (i.e. not a material change)."
- 5.30 Therefore, landscape impacts must be considered to be **neutral**, and should not form a reason for refusal.

Trees

- 5.31 The accompanying *Arboricultural Impact and Mitigation Statement* notes that two moderate category poplar trees (T063 and T064) would need to be removed to enable the site access to be delivered, but the scheme has been designed to avoid any harm to any other trees, including the A1 category oak tree T065.
- 5.32 The landscape mitigation planting referred to in 5.29 can be expected to result in the planting of sufficient new trees to deliver an overall arboricultural benefit, which must be given **positive weight** in the balance.

Flood Risk/Drainage

- 5.33 The accompanying *Flood Risk Assessment & Drainage Strategy* explains that:
- The Site has a low risk of flooding from all sources.
 - The surface water drainage strategy is attenuation based, provided by both sub base storage under hard surfaces and an attenuation basin, before drainage to the existing ditch located to the south of the site/north of Seagry Road.
- This strategy would result in a discharge rate of 0.7l/s in all scenarios up to the 1 in 100 year + 45% storm event. This results in a betterment over the current situation, in which for example the current 1 in 100 year discharge rate is 1.74l/s and the 1 in 30 year discharge rate is 1.4l/s.
- 5.34 This surface water drainage rate betterment should be given **positive weight** in the planning balance.

6 Conclusion

- 6.1 This application proposes to deliver 8 self build homes on the edge of Great Somerford.
- 6.2 Given the significant housing shortfall in Wiltshire, this application should be considered against the tilted balance set out in paragraph 11 d) ii. of the NPPF. Heritage impact is at the bottom end of less than substantial at worst, and this is outweighed by a range of public benefits, so the tilted balance is not disapplied by any factors in paragraph 11 d) i. of the NPPF, and the balance is not altered by the existence of the Great Somerford Neighbourhood Plan.
- 6.3 This application would deliver much needed new homes in an area with a significant shortfall and, as the proposal is for self build homes, this application would also help Wiltshire Council meet its statutory duty to deliver self/custom build homes; a duty that it is currently failing to meet. Both of these factors, separately, should be given substantial positive weight in the planning balance.
- 6.4 The proposal would deliver an arboricultural and surface water drainage enhancement, both of which should be given positive weight in the planning balance.
- 6.5 The southern Broadfield Farm site was considered to be a suitable and accessible location for development, so the Site must similarly be considered suitable and accessible in this context. The proposal would be safe for vehicle users and pedestrians, so the highways/transport impact is neutral.
- 6.6 Any material landscape effects would be mitigated by the proposed landscaping enhancements between the Site and footpath GSOM6, so landscape impacts are also neutral.
- 6.7 Ecological effects are not yet finalised, but at this stage it seems unlikely that these effects would be significant enough to trigger a refusal based on paragraph 193a of the NPPF.
- 6.8 On that basis, the adverse impacts of the proposal do not significantly and demonstrably outweigh the harm that would result, so we trust that the application will be approved.