

Our ref: DS/Hassan/PiP

4th March 2026

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Dear Sir/Madam,

Town and Country Planning Act 1990

**Permission in Principle for two dwellings at Upper Castle Combe,
Chippenham, SN14 7HA.**

Introduction

1. We are instructed by the owner of the above site, Emily Hassan, to prepare and submit this Permission in Principle (PiP) for the construction of 2 dwellings at the above site.
2. This application is submitted in accordance with the PiP regime, under which consideration is limited to the matters of location, land use, and the amount of development. All other matters will be submitted for consideration at the Technical Design Consent (TDC) stage.
3. Notwithstanding the above, an illustrative proposed block plan is submitted alongside this application to demonstrate the potential site layout, including the indicative location of the access, dwellings, garages, parking spaces, and manoeuvring area.
4. Please find enclosed in support of this application:
 - The completed planning application forms and certificates;
 - Planning, Design and Access Statement (this letter);
 - Site Location Plan, numbered H-JH-01;
 - Proposed Block Plan, numbered H-JH-02;
 - The application fee of £1,176.

Background

5. Upper Castle Combe forms part of Castle Combe and sits on higher ground to the east of the historic core of the village. Prior to the historic North Wiltshire Local Plan being produced, there was a discussion on whether Castle Combe should be considered as a village (settlement). It was concluded to not class it as a settlement to prevent pressure of development

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impacting the special historic area of the main (lower) Castle Combe village, due to its worldwide historic recognition. However, Upper Castle Combe sits away from the main historic hub of the village and development here would not be harmful to the historic character and appearance of Castle Combe village.

6. The site is currently part of a larger block of land on the south side of the unnamed track, which serves houses on the north side of the track and other dwellings to the west. About 160m to the west of the application site, the unnamed lane continues north-west as a bridleway CCOM15.
7. The application site measures some 0.18 hectares (0.46 acres) and is located off a single track unnamed lane, which leads to the junction of West Yatton Lane and the B4039. Chippenham sits around 6km to the south west of Upper Castle Combe.
8. The application site is currently in use as allotments. These allotments, and the additional allotments to the west of the application site, are owned by the applicant. The applicant intends to offer the current allotment holders alternative plots on the land to the west, where there are surplus allotment plots available.
9. The site is within the Bath and Bradford-on-Avon bat buffer zone Special Area of Conservation (SAC), Castle Combe Conservation Area and the Cotswolds National Landscape.
10. The Environment Agency Flood Map shows that the site is located within Flood Zone 1. The Council's Strategic Flood Risk Assessment Data Explorer shows that the site has a negligible risk from groundwater flooding.

Proposal

11. The proposed dwellings will sit to the north of the plot, facing the lane, with gardens to the south. The site will be accessed at the north east corner, adjacent the existing track that accesses the allotments. See the block plan for details.

Permission in Principle criteria

12. The PiP consent route is an alternative way of obtaining planning permission for a housing-led development which separates the consideration of matters of principle for the proposed development from the technical details of the development. The route has 2 stages: the first stage (PiP stage) establishes

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whether the site is suitable in-principle, and the second stage (TDC stage) is when the detailed development proposals are assessed.

Relevant Planning Policies

13. Under the provisions of sections 58A and 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. At the current time, the statutory development plan in respect of this application comprises of the National Planning Policy Framework (NPPF) (Revision December 2024) and the Wiltshire Core Strategy (WCS) (adopted January 2015).

National Planning Policy

14. We understand that the NPPF is relevant to new proposals and that the NPPF expects local planning authorities (LPAs) to plan positively for sustainable development. The three objectives to sustainability are economic, social and environmental, these are reflected in the policies of the NPPF as well as local policies.
15. Paragraph 11 of the NPPF sets out (inter alia); *"Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:*
 - 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 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".*
16. Footnote 8 states; *"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".*
17. Paragraph 61 makes clear that *"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed".* It

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continues; *"the overall aim should be to meet an area's identified housing need"*.

18. Paragraph 73 emphasises that *"small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built out relatively quickly"*.
19. Paragraph 78 states that (inter alia); *"Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities 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 set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*
 - a) 5% to ensure choice and competition in the market for land; or*
 - b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply"*.
20. Paragraph 116 states; *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"*.
21. Paragraph 135 sets out (inter alia); *"Planning policies and decisions should ensure that developments:*
 - a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)"*.

Local Planning Policy

22. We consider that the following WCS policies are relevant to this application.
23. Core Policy 1: Settlement Strategy. *"In line with Core Policy 1, the delivery strategy seeks to deliver development in Wiltshire between 2006 and 2026 in the most sustainable manner by making provision for at least 178ha of new employment land and at least 42,000 homes"*.

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24. Paragraph 4.26 of Core Policy 1 shows a table which highlights the housing requirement for each Community Area. The indicative requirement for the Chippenham Community Area is 580.
25. The most relevant part of the summary of Core Policy 1 states; *"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"*.
26. Core Policy 2 says in relation to this; *"sustainable development within the limits of development or at Small Villages should not be constrained just because requirements have been reached. For these reasons the overall housing requirement is shown as "at least", while the area strategy figures are "indicative" "*.
27. Core Policy 2: Delivery Strategy – *"At the Small Villages development will be limited to infill within the existing built area. Proposals for development at the Small Villages will be supported where they seek to meet housing needs of settlements or provide employment, services and facilities provided that the development:*
i) Respects the existing character and form of the settlement
ii) Does not elongate the village or impose development in sensitive landscape areas
iii) Does not consolidate an existing sporadic loose knit areas of development related to the settlement".
28. Core Policy 2 Paragraph 4.34; *"The delivery strategy defines the level of growth appropriate within the built up area of small villages as infill"*.
29. Core Policy 10: Spatial Strategy for the Chippenham Community Area – *"Development in the Chippenham Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1"*.
30. Core Policy 50: Biodiversity and Geodiversity – *"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"*.

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31. Core Policy 51: Landscaping – *"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"*.
32. 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"*.
33. Core Policy 58: Ensuring the conservation of the historic environment (inter alia) – *"Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:
iv. the special character or appearance of conservation areas"*.
There is no Conservation Area Statement or Appraisal to refer to when considering this proposal.
34. Core Policy 58 continues; *"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)"*.
35. Core Policy 61: Transport and New Development – *"New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives"*.
36. Core Policy 67: Flood Risk – *"Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice"*.

Planning Considerations

Principle of Development

37. Core policies 1 and 2 of the WCS comprise of the overarching strategy for new developments in Wiltshire. Additionally, Core Policy 10 relates to the Chippenham Community Area. Whilst Upper Castle Combe is not designated as a "Small" or "Large Village" in the WCS, by function it is still a village. The Large Village of Yatton Keynell is located some 2km to the south east.

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38. We consider the proposal could be determined with infill development in mind, which is acceptable in small villages if it meets the criteria set out in CP2. There are dwellings to the east and north; there is a meeting room to the west and industrial buildings to the south.
39. The definition of infill is described in the WCS, Core Policy 2, paragraph 4.34; infill is defined as the filling of a small gap within the village that is only large enough for not more than a few dwellings, generally only one dwelling. This site is a small gap, suitable for 2 dwellings, within the village of Upper Castle Combe.
40. In accordance with the infill criteria set out in Core Policy 2 of the WCS, the development will respect the existing character and form of the settlement by using quality materials that compliment the surrounding existing dwellings as well as implementing suitable landscaping to further enhance the character of the area. It will not elongate the village or consolidate an existing sporadic loose knit area of development relating to the settlement.
41. However, the site is within a sensitive landscape area, being within the Castle Combe Conservation Area and the Cotswolds National Landscape. This has been considered and will be considered further at the TDC stage. The proposed dwellings and landscaping will enhance the character of the area.
42. The site is not within an isolated location, it is surrounded by dwellings and employment units. It is clear that Castle Combe (including Upper Castle Combe) is a village which hosts many businesses and services, including; garage, Castle Combe Congregational Church, Merlin Motorsport car parts shop, Castle Combe Circuit, Wiltshire College & University Centre at Castle Combe Circuit, UPS Access Point, Wiltshire Wood Recycling, Gloucester Wood Recycling, Stonewood Builders, The Castle Inn, The White Hart, Castle Combe Village Hall, St. Andrew's Church and Manor House Golf Club.
43. With the above in mind, we consider this site to be a sustainable location. The village is well served by public transport; Faresaver buses (95 and 95A) stop at Upper Castle Combe at around a 2 hourly basis, 6 days a week, and travels to the neighbouring village of Yatton Keynell and the nearby town of Chippenham. The bus stops are on the B4039, within walking distance of the site.
44. Yatton Keynell is also easily accessible by bicycle, as well as Chippenham, being around 4 miles south east of Upper Castle Combe.

Housing Land Supply

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45. Wiltshire Council are currently in a position where they cannot demonstrate a 5 year Housing Land Supply (HLS). The Council acknowledges that it only has 2.02 years of HLS. This means that local policies, cannot be seen as being up-to-date and that housing developments in locations outside the settlement boundary, but well-related to other land uses, should be considered as being suitable, in accordance with paragraph 11(d) of the NPPF.
46. The application site is well related to the surrounding residential area of (Upper) Castle Combe, the nearby Large Village of Yatton Keynell and the local market town of Chippenham.
47. The NPPF recognises that small sites are often built relatively quickly and great weight should be given to housing sites within existing settlements.

Character and Appearance

48. The details of the massing and scale of the proposed dwellings will be determined in the TDC submission stage, but the design will ensure that the dwellings will respect the Cotswolds National Landscape and Castle Combe Conservation Area. It will also reflect the general character of the surrounding residential land uses and the village of Castle Combe in general whilst being at a suitable housing density.
49. The indicative site plan shows that the site can accommodate 2 dwellings that would front the road, reflecting the line of the existing dwellings on the opposite side of the road. This along with the use of high quality, complimentary materials for the dwellings will ensure they blend in with the existing residential character of the area. The generous gardens will be appropriately landscaped which will aid the dwellings to be in keeping with and integrate well within the character of the area.
50. The site is surrounded by established vegetation and trees which will, in the main, remain as part of the proposal. Not only will this preserve the character, setting and appearance of the site and its surroundings but it will ensure that the important landscape and habitat features will remain whilst keeping views in and out of the site to a minimum.

Residential Amenity

51. It is not anticipated that the proposed dwellings would overlook, overshadow or have an overbearing impact on occupants of the proposed or surrounding dwellings. The site is of sufficient scale to provide appropriately sized private garden.

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52. The TDC stage will include details to show that the proposals will not create unacceptable living conditions, a lack of privacy, nor have an adverse impact on the residential amenities of the proposed and surrounding dwellings.

Highways and Access

53. The site is accessed via a single track, unnamed road, which currently serves the allotment plots, 4 dwellings and a meeting room at the end of the track. The vehicular movements created by the development would not be substantially greater than the movements to and from the existing site.

54. The advice of a professional Highways Technician has been sought and their opinion of the access to the site is as follows:

From personal experience allotments generate a fair amount of traffic February – November, with the requirement to water everyday May – September this does typically generate at least two one-way trips per day per plot, and seven days a week. Equally while the plot holder may live within walking distance it is often easier to drive if carrying equipment, and so a build-up of parked vehicles can occur morning and late afternoon.

Two residential units will typically generate four two-way movements each day. Therefore, there should be no traffic generation increase, and if anything there is an argument to say that the need for vehicles to pass on the narrow access may in fact reduce.

To ease the path of resistance it may be easier to provide a passing place, but not essential. However, it will be necessary to allow for fire tender and refuse vehicle access to the future two units. Providing a passing place would be a net benefit and there is an argument to say that only the two unit proposal would allow an improvement that addresses a long standing issue.

55. The apron access into the dwellings can also be used as a passing place, which would improve the function of the road for other users. A Highways Report could be submitted at the TDC stage if necessary.

56. At least 3 parking spaces will be provided to the side and in front of each dwelling, as well as each having a large garage for parking. This meets, or even exceeds the requirements of the Wiltshire Local Transport Plan - Car Parking Strategy (2011-2026), which states a minimum of 3 allocated parking spaces should be provided for a 4+ bedroom dwelling. There is ample space for turning on site to enable vehicles to egress the site in forward gear.

Landscaping and Ecology

57. The site is located within the Castle Combe Conservation Area. Upon writing this statement, there is currently no supporting statement or appraisal for

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this Conservation Area. However, the impacts of the proposed development on the area will be carefully considered and discussed during the TDC stage.

58. We believe the proposed development will enhance the character of the area by the use of high quality materials that fit in with the character of surrounding dwellings, as well as sympathetic landscaping to enhance the appearance.
59. Ecological surveys will be carried out and submitted for the TDC stage, these will include a Preliminary Ecological Assessment (PEA) and the Biodiversity Net Gain (BNG) metric and report.
60. There is no reason to believe that the development would result in any environmental or ecological harm and there is ample space within and around the application site to provide any ecological enhancements (to create a 10% BNG). Alternatively, off site BNG enhancements could be sought.
61. It is the intention that all of the important existing landscape features around the boundary of the site will remain unaltered as part of the proposal. Additional planting and landscaping will be detailed and discussed at the TDC stage.

Flooding and Drainage

62. The site, which is less than 1 hectare, is located within Flood Zone 1, therefore, there is less than 1 in 1,000 annual probability of flooding from rivers.
63. Regarding drainage, surface water will be disposed of via soakaways and sewage will be disposed of via mains sewer.

Planning Benefits

64. The application proposals will deliver economic, social and environmental benefits. The provision of additional housing will deliver social and economic benefits and the development will help to support local businesses and services by providing homes for people who may work in the village. It will support the local economy as the residents will likely use the local businesses, as well as having employment opportunities in the area. Jobs will be created during the construction process with associated positive economic effects.
65. This is in line with the advice of the NPPF which explains that housing should be located where it will enhance or maintain the vitality of rural communities. This will be the case. The LPA will also receive CIL receipts which represent further economic benefits of the proposals.

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66. In relation to environmental benefits the proposal can secure environmental improvements, including increased planting and Biodiversity Net Gain. Furthermore, the development makes efficient use of land.

Community Infrastructure Levy (CIL)

67. CIL is not a required at this stage but the applicant understands that there will be a need for CIL provision in relation to the proposed dwellings. The relevant forms will be submitted with the stage 2 technical details consent application.

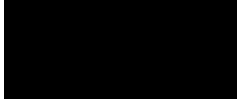
Concluding Summary

68. Section 70(2) of the Town and Country Planning Act 1990 provides that, in dealing with proposals for planning permission, regard must be had to the provisions of the development plan (local plan), so far as material to the application, and to any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that if regard is to be had to the development plan for any determination then that determination must be made in accordance with the plan unless material considerations indicate otherwise.
69. There are some limited opportunities for the provision of residential development sites to exist outside of settlement boundaries. These can both allow villages like Upper Castle Combe and those surrounding to remain vibrant mixed communities that support existing and new community facilities, whilst providing much needed additional local housing. This factor is particularly applicable in light of the significant shortfall of Wiltshire's unmet housing supply need.
70. As highlighted above, Wiltshire Council cannot currently demonstrate the required housing land supply. Resulting in the NPPF Paragraph 11d(ii) presumption in favour of sustainable development being engaged in this case. This explains that planning permission should be granted unless the adverse impacts of approving the development would significantly and demonstrably outweigh the benefits when assessed against the NPPF policies as a whole.
71. We consider that the proposal will not significantly or demonstrably outweigh the benefits when assessed against the NPPF. No harm will result from this proposal and there are clear benefits associated with the development particularly in light of the shortage of housing land supply. We consider that the development therefore represents sustainable development and the tilted balance indicates that a permission in principle should be approved.

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72. We trust that you have all the necessary information that you require to validate and determine this application for Permission in Principle. If the officer does require any information or clarification on any element of the proposal, we invite a discussion during the determination process.

Yours faithfully,



Debbie Silver