

PLANNING STATEMENT

in support of an

Application for Permission in Principle

for

**The erection of up to 9 dwellings (including 5
affordable homes)**

at

Land to the North of Windley Ridge

Lottage Road

Aldbourn

Marlborough

SN8 2JZ.

CONTENTS

1.0	Introduction	1
2.0	Site Description and Planning History	1
3.0	The Proposed Development	4
4.0	Planning Policy Context	4
5.0	Planning Assessment	15
6.0	The Principle of Development & Planning Balance	16
7.0	Conclusions	18

1.0 INTRODUCTION

- 1.1 Artland Ltd has been instructed by Mr Mark Drake to submit a Permission in Principle (“PiP”) application for the erection of up to nine dwellings (to include 5 affordable homes) on land to the north of Windley Ridge, Lottage Road, Aldbourne, Wiltshire.
- 1.2 The Housing and Planning Act 2016 provides PiP may be granted for housing-led development. The National Planning Practice Guidance (PPG) advises that PiP is an alternative way of obtaining planning permission that separates the consideration of matters of principle for proposed development from the technical detail of the development.
- 1.3 There are two stages to a permission in principle consent. The first stage (permission in principle stage) establishes whether a site is suitable in-principle and the second (technical details consent) stage is when the detailed development proposals are assessed.
- 1.4 The Government’s guidance sets out that the scope of the first stage of permission in principle is limited to location, land use and the amount of development.
- 1.5 This statement provides an assessment of the applicable planning policies and the key material planning considerations relevant to the principle of development. Details of the precise form of the development and detailed design would be considered at the technical details stage.

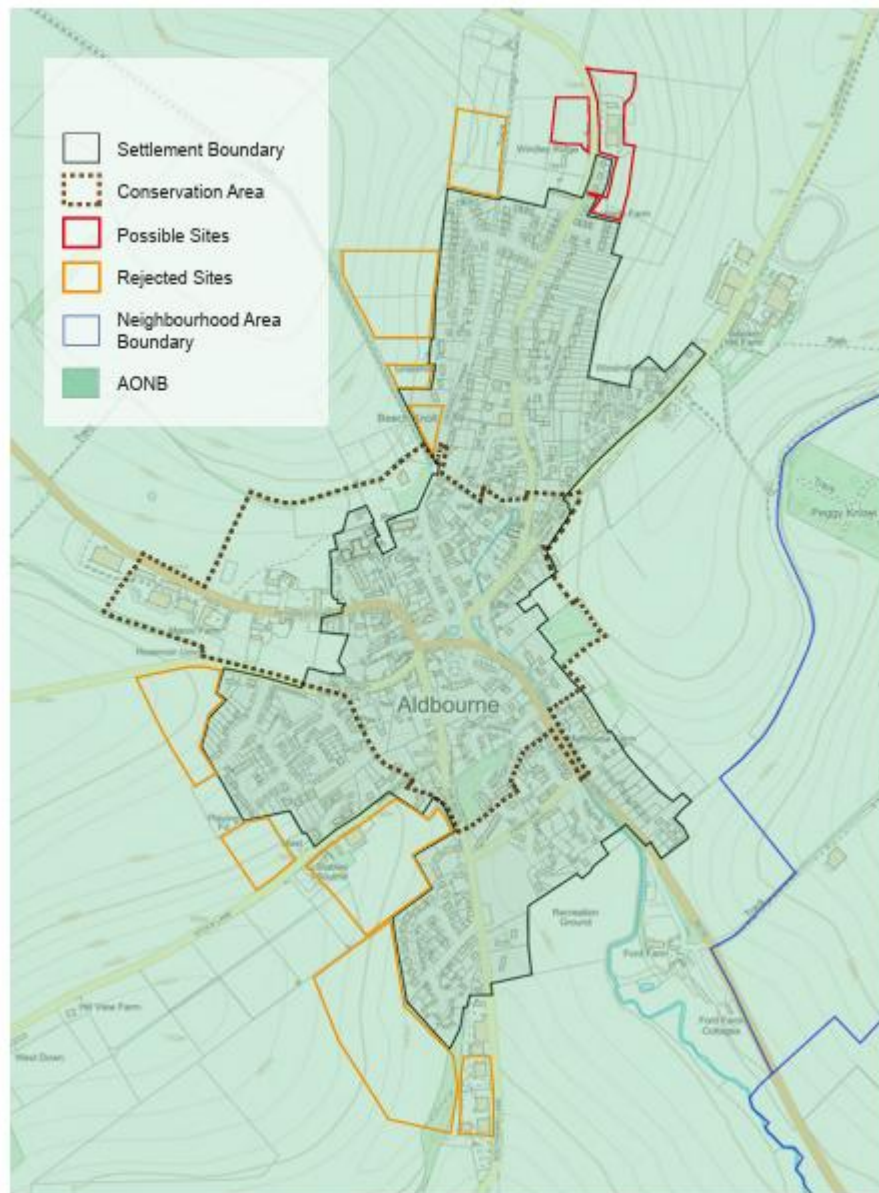
2.0 SITE DESCRIPTION & PLANNING HISTORY

- 2.1 The Site comprises an area of grazing land that lies to the north of the property known as Windley Ridge on northern outskirts of the village of Aldbourne. It lies opposite Lottage Farm where outline planning approval has been granted for up to 32 houses under 21/01004/OUT.
- 2.2 This site is level and is accessed off Lottage Road as one exits the village to the north



- 2.3 Aldbourne is defined as a 'Large Village' within the Wiltshire Core Strategy and The North Wessex Downs National Landscape washes over both the village and the site.

2.4 The following plan shows the application site and its proximity to the settlement boundary



Aldbourne Neighbourhood Development Plan 2021 – 2036

A review of magic map (<https://magic.defra.gov.uk/>) confirms that there are no other designations, or site specific constraints affecting the application site

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The proposal seeks PiP for the erection of up to nine dwellings on the application site that would be served from the existing vehicular entrance off Lottage Road.
- 3.2 The straight alignment of the road and typical road speeds on the approach to the village (which is subject to a 30mph speed limit) would allow appropriate visibility splays to be provided.
- 3.3 It is anticipated that the development would primarily consist of two-storey dwellings, with a strategic transition to single-storey units toward the northern boundary. This would serve to soften the transition between the built form and the open countryside and provide a graduated transition that respects the site's natural topography and preserves the rural character when approaching from the north.

4.0 PLANNING POLICY CONTEXT

4.1 National Planning Policy

- The National Planning Policy Framework (December 2024) (the "NPPF") sets out the government's overarching planning policies for England with a presumption in favour of sustainable development.

Paragraph 11(d) that is often referred to as the "tilted balance" records that this presumption applies in circumstances where the policies which are most important for determining the application are out-of-date unless the application of policies in the NPPF provides a strong reason for refusing the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

The following paragraphs of the NPPF are relevant to PiP and the consideration of

this application:

- Paragraph 39 recognises that PiP can help secure developments that will improve the economic, social and environmental conditions of the area and provides that decision-makers at every level should seek to approve applications for sustainable development where possible.
- Paragraph 61 states 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. The overall aim should be to meet an area’s identified housing need and in doing so address the needs of groups with specific housing requirements.
- Paragraph 73 emphasises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and notes that PiP can help to bring such sites forward.
- Paragraph 78 explains that LPAs should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years’ worth of housing against their housing requirement set out in adopted policies, or against their local housing need where the strategic policies are more than 5 years old. The supply of deliverable sites, should also deliver a buffer as set out in the policy.
- Paragraph 82 notes that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.
- Paragraph 189 provides that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues

- Paragraph 190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.
- In this instance and having regard to the development approved at Lottage Farm this proposal is not considered to be major development for the purposes of NPPF paragraph 190.



4.2 *The Local Development Plan*

4.3 Planning law and in particular, Sections 38(6) of the Planning and Compulsory Purchase Act 2004 and 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The same considerations apply to applications for PiP.

4.4 The development plan relevant to the proposed development is the Wiltshire Core Strategy (WCS) (adopted January 2015), which includes saved policies from the former Kennett Local Plan. The key local policies relevant to the statutory scope of a PiP application - specifically regarding location, land use and amount of development, are as follows:

- 5 Core Policy 1: Settlement Strategy
- 6 Core Policy 2: Delivery Strategy
- 7 Core Policy 14 Marlborough Area Strategy
- 8 Core Policy 43 Providing Affordable Homes
- 9 Core Policy 44 Rural Exception Sites
- 10 Core Policy 45 Meeting Wiltshire's needs
- 11 Core Policy 50 Biodiversity and Geodiversity
- 12 Core Policy 51 Landscape
- 13 Core Policy 57 Ensuring high quality design and place shaping
- 14 Core Policy 60 Sustainable Transport
- 15 Core Policy 61 Transport & Development
- 16 Core Policy 67 Flood Risk

Taking each of these in turn, we would comment further as follows:

Core Policy 1: Settlement Strategy

Aldbourne is categorised in the Local Plan as a large village. Large villages are defined as settlements with a limited range of employment, services and facilities.

The policy provides that 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 and supported in order to help retain the vitality of these communities.

- Core Policy 2 Delivery Strategy

The delivery strategy notes that development will not be permitted outside the limits of development, as defined on the policies map. other than in circumstances permitted by the exception policies within the plan.

- Core Policy 14 Marlborough Area Strategy

The policy identifies that approximately 240 homes are to be provided in the wider Marlborough Community Area in the plan period to provide sustainable and measured growth that will also help to deliver affordable housing in the Community Area and improve access to open market housing.

- Core Policy 43 Providing Affordable Homes

The policy provides that on sites of five or more dwellings in the Marlborough Area, affordable housing provision of at least 40% (net) will need to be provided.

- Core Policy 44 Rural Exception Sites

The Spatial strategy allows for carefully managed development outside of settlement boundaries such as providing affordable housing. These ‘exception policies’ are outlined in para. 4.25 of the Strategy and include Core Policy 44 that relates to Rural Exception Sites.

This policy allows for the allocation of, or granting of planning permission for, small sites comprising affordable housing only as an exception to normal policies. The policy sets out the criteria against which such proposals will be evaluated and under what circumstances schemes solely for affordable housing may be permitted.

As an exception to normal policy therefore, and where it can be demonstrated that a proposed development will meet a particular locally generated need that cannot be accommodated in any other way, the council may permit small scale residential development (10 dwellings or fewer) outside but adjoining the development limits of Local Service Centres and Large Villages, or adjacent to the existing built area of Small Villages.

In those circumstances, the inclusion of open market housing will not normally be supported. However, the policy recognises that there may be situations where some market housing may be considered appropriate provided the majority of the development being for affordable housing; where otherwise the site would be unviable without cross-subsidy.

This exception to policy allows housing for local need to be permitted, solely for affordable housing, provided that:

- i. the proposal has clear support from the local community

- ii. the housing is being delivered to meet an identified and genuine local need
- iii. the proposal is within, adjoining or well related to the existing settlement
- iv. environmental and landscape considerations will not be compromised
- v. the proposal consists of 10 dwellings or fewer
- vi. employment and services are accessible from the site
- vii. its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement
- viii. the affordable housing provided under this policy will always be available for defined local needs, both initially and on subsequent change of occupant.

- Core Policy 50 Biodiversity and Geodiversity

Core Policy 50 seeks to ensure the protection of important habitats and species and the enhancement of biodiversity; restricting development which would result in the loss of trees, hedges or other features that contribute to the character of the area.

The mandatory requirement to provide a Biodiversity Net Gain (BNG) of 10% would be addressed at Technical Details Stage and consequently there is no need to submit a Biodiversity Gain Plan or a detailed metric as part of this application.

- Core Policy 51 Landscape

The application site lies within the North Wessex Downs National Landscape and the NPPF advises that great weight should be given to conserving and enhancing its landscape and scenic beauty (paragraph 189).

The North Wessex Downs National Landscape Management Plan 2025–2030 seeks to conserve and enhance the distinct Landscape Character Types and their valued qualities. The plan supports the provision of affordable housing that meets

evidenced local need (right development, right place) and meets the purposes of the National Landscape to conserve and enhance natural beauty. It notes that proposals should demonstrate an understanding of, and respond to, local context and natural beauty with the aim of embodying a sense of place throughout the process with any new development displaying a design quality worthy of a nationally designated landscape.

The Neighbourhood Plan Examiner's Report considered that the Lottage Farm site had a neutral impact on the AONB. The AONB Unit's Landscape and Planning Officer raised no objection to the outline planning application for Lottage Farm but highlighted the need to ensure that at reserved matters stage, building heights were suitably resolved to avoid development creeping inappropriately up the valley side.

We respectfully submit that similar considerations would apply to the application site and that subject to appropriate design and detailing, the development of the site is unlikely to cause harm to the wider landscape of the AONB.

The development would also provide the opportunity to reinforce the entrance to the village which is noted as an important transition between the open countryside and the village itself.

Whilst the principle of new housing development in this location within the National Landscape has been found to be acceptable at Lottage Farm, there would inevitably be an incremental impact on the landscape and a degree of conflict with Core Policies 51, 57 and Policy 15 of the NP.

As stated, any specific concerns related to those matters can be addressed and adequately mitigated in the detailed design of the buildings and landscaping at the

Technical Details stage.

- Core Policy 57 Ensuring high quality design and place shaping

New development should enhance local distinctiveness relating positively to its setting and should make an efficient use of land having regard to its impact on adjoining uses and buildings.

It is considered that the scale of development is appropriate for the site and will not result in any unacceptable loss of amenity to nearby occupants or future occupants of Lottage Farm.

Again, any specific issues relating layout, outlook, and privacy can be resolved as part of the Technical Details submission.

- Core Policy 60 Sustainable Transport

Paragraph 110 of the NPPF recognises that sustainable transport opportunities differ between urban and rural settings. The site is directly served by the Windmill Close bus stop, which provides a multi-directional service (Routes 46A, 48, 48A, and X46) connecting residents to the primary employment and service hubs of Swindon, Marlborough, and Hungerford.

Additionally, the integration of the Wiltshire Connect on-demand service ensures that the location should be considered to be an accessible location aligning with sustainable transport objectives of Core Policy 60.

Electric Vehicle Charging Points would be included in the detailed design to facilitate the use of ultra-low and zero emission vehicles and further support the

sustainable modes of transport in the future.

- Core Policy 61 Transport & Development

Core Policy 61 requires development proposals to demonstrate that they are capable of being served by safe access to the highway network. In this respect, there is adequate visibility to ensure that vehicles entering or exiting a site can do so safely.

Additionally, it should be noted that in considering the Lottage Farm application, the Highways Officer confirmed that he was satisfied there were no highway capacity issues in relation to Lottage Road and the network of roads and junctions through the village

- Core Policy 67 Flood Risk

The site lies in flood zone 1 and is less than 1 ha, so a site-specific Flood Risk Assessment (FRA) is not required.

A small area of the Site is identified as having a Low Chance i.e. between a 0.1% and 1% chance each year of surface water flooding, with a lesser area being identified as having a Medium chance (between 1% and 3.3% chance each year)

The latter relates to an area behind the roadside hedge which would not form part of the built development. The site is underlain by chalk and infiltration testing indicates that there is has good ground permeability into the chalk that would enabler the use of infiltration-based drainage systems. The details of the Surface Water Drainage Scheme would submitted at the technical details stage.

In relation to foul drainage, Thames Water raised no objection to the Lottage Farm

application on the basis that the scale of the proposed development would not materially affect the sewer network. This clearly suggest there would be adequate capacity in the network to service the application site.

Thames Water recognises that the catchment is subject to high infiltration flows during certain groundwater conditions and that these can surcharge the sewer network. Whilst there is no doubt that Parish Council will be concerned that any additional waste could exacerbate this situation; the drainage scheme would be designed to prevent any run-off or exceedance flows leaving the site. The form of containment would ensure the existing issue is not exacerbated, but potentially improved.

4.5 *Emerging Planning Policy*

4.6 The Wiltshire Local Plan Review is under independent examination to replace the aging 2015 Core Strategy. Although it preserves the current spatial strategy, it lacks full compliance with the latest December 2024 NPPF. Recent intervention by the Planning Inspectorate has flagged deficiencies in the evidence base and policy alignment, with the result that in late 2025, the Inspectors paused hearings to demand more work on housing need and employment land.

4.7 *Neighbourhood Plan*

4.8 The Aldbourne Neighbourhood Development Plan (ANDP) 2020–2036 acknowledged the suitability of the land to the north of Windley Ridge (ANP2) as a preferred site for residential development and supported development on part of the site.

4.9 While the ANDP records that (ANP2) was initially withdrawn by the landowner during the Regulation 14 stage, leaving only Lottage Farm for formal allocation;

this withdrawal was a procedural decision rather than a reflection of the site's planning merits.

- 4.10 It is important to note that following the grant of Outline permission (Ref: 21/01004/OUT) for the Lottage Farm site, the ANDP's primary housing strategy has now been exhausted such that the plan's delivery capacity had been spent.
- 4.11 In failing to include active site allocations, the plan therefore no longer meets the criteria for protection under NPPF Paragraph 14(b) and the 'tilted balance' under Paragraph 11(d)(ii) is engaged.
- 4.12 Accordingly, where Wiltshire Council's housing land supply remains in a critical deficit (approximately 2.41 years) and the ANDP is now silent on further delivery, the restrictive policies of that plan should be afforded minimal weight compared to the national imperative to boost the supply of homes.

5.0 **PLANNING ASSESSMENT**

5.1 *Environmental Impact Assessment*

- 5.2 The application site is situated within a 'Sensitive Area' as defined by Regulation 2(1) of the EIA Regulations 2017 (a National Landscape). Consequently, having regard to the thresholds detailed in Category 10(b), the site will need to be screened by the Council to determine the requirement for an Environmental Impact Assessment.
- 5.3 The Council is therefore formally requested to adopt a Screening Opinion under the Town and Country Planning (EIA) Regulations 2017, supported by the evidence provided within this statement. While the site's location within a National Landscape (Sensitive Area) necessitates formal screening, the assessment of 'significance' must be applied proportionately and consistently.
- 5.4 In reaching its conclusion, the Council's attention is drawn to the site at Lottage Farm, located immediately opposite the application site. Despite that scheme being

ARTLAND LTD

significantly larger in scale, the Council concluded in March 2023 that an Environmental Impact Assessment (EIA) was not required.

- 5.5 Given that the current proposal is of a lesser scale, we submit that it would be both inconsistent and procedurally disproportionate to conclude that this scheme would result in 'significant environmental effects' under the Schedule 3 selection criteria. Furthermore, having had regard to potential cumulative impacts when considered with the Lottage Farm scheme, we maintain that the combined effects would not reach the threshold of significance required to trigger an EIA. The Council is, therefore, invited to adopt a negative Screening Opinion.

6.0 THE PRINCIPLE OF DEVELOPMENT AND PLANNING BALANCE

- 6.1 Although contrary to the overarching spatial restrictions of Policies CP2 and CP14, the scheme complies with the specific requirements for Rural Exception Sites under Core Policy 44 which allows essential local-needs housing in locations where development would otherwise be prohibited.
- 6.2 The Aldbourne Neighbourhood Plan identifies that Lottage Farm could potentially deliver around 32 of Wiltshire's provisional target of 40 houses. The development proposed in the application would address the shortfall whilst also providing much needed affordable homes. The Housing Needs Study identified a target of 17 affordable homes of which it is anticipated the development at Lottage Farm will potentially provide 14 homes (40% of 32). The development at Windley Ridge in proposing 5 affordable homes would also address that shortfall.
- 6.3 Wiltshire Council currently lacks a five-year housing land supply (5YHLS), and as a result pursuant to paragraph 11(d), the presumption in favour of sustainable development is engaged, so 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 this Framework taken as a whole

- 6.4 In July 2025, Wiltshire Council published an update to Briefing Note 24-20, citing a five-year housing land supply of 2.41 years. This figure was calculated using the then-current 'Standard Method' baseline. However, this statement is now out of date as it fails to account for the application of 20% buffer (NPPF Paragraph 78(b). where there has been under-delivery of housing under Housing Delivery Test. This indicates that the housing deficit becomes even more acute than reported.
- 6.5 In this respect, Footnote 7 provides that the presence of a National Landscape only disengages the presumption in favour of sustainable development where the application of landscape policies would provide a 'strong reason for refusing' the proposal. In this instance, it is clear that the development could be delivered without material harm to the 'valued qualities' of the designation and consequently no such reason for refusal exists.
- 6.6 The development would also produce short term benefits to the construction industry. The NPPF recognises that “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly.” (paragraph 73).
- 6.7 The development would support the vitality of the local community and also deliver ecological benefits associated with the requirement to deliver 10% Biodiversity Net Gain that will be considered during the technical details stage.
- 6.8 In summary, the proposal would provide a valuable contribution toward addressing the critical deficit in the Council’s five-year housing land supply. In accordance with the presumption in favour of sustainable development set out in Paragraph 11(d) of the NPPF, the policies most important for determining the

application are deemed out-of-date and therefore the significant social and economic benefits of delivering new homes in this location would significantly and demonstrably outweigh any minor conflict with Local Plan policies when assessed against the Framework taken as a whole.

- 6.9 Recent planning appeals including those at Sherston Road, Malmesbury – Appeal Ref: APP/Y3940/W/25/3369892 and Land North of Bath Road, Corsham, SN13 9XR - Appeal Ref: APP/Y3940/W/25/3370482 weight heavily in favour of granting PiP for the current application. The justification for the subject site can be stated in similar terms to that provided at Paragraph 49 of appeal decision for Bath Road:

However, there is no dispute between the parties that the Council cannot demonstrate a 5-year supply of housing.²⁵ In such situations NPPF paragraph 11 d) is engaged.²⁶ The effect of this is two-fold. Firstly, it renders the policies which are most important for determining the application ‘out-of date’. This means the conflict with WCS Policies 1 and 2 carries limited weight. Secondly, the planning balance shifts in favour of the grant of consent as a result of the ‘tilted’ balance in paragraph 11d)ii). Only if harm “significantly and demonstrably” outweighs the benefits of the development, should consent be refused.

7.0 CONCLUSION

- 7.1 The application seeks Permission in Principle for the construction of nine dwellings that would help meet an identified and genuine local need.
- 7.2 Footnote 8 of paragraph 11 (d) of the NPPF provides that in situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites, permission should be granted unless 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.

- 7.3 Whilst it is recognised that the development lies outside the settlement boundary and within the National Landscape, we submit that the scheme can be designed to ensure that no unacceptable harm is caused to the landscape character of the area and the National Landscape. In common with Lottage Farm, any concerns relating to the protection of the landscape would be capable of being successfully mitigated through sensitive technical design to accord with the Aldbourne Parish Community Character and provide a mix of housing types to meet the demographic needs of Aldbourne including the need for affordable homes and homes for local people to downsize to.
- 7.4 The presence of the National Landscape should not itself be a bar to development that would serve a clear public interest and would help secure the long-term social and economic sustainability of the village given that the proposal would constitute a compliant Rural Exception Site pursuant to Core Policy 44.
- 7.5 The Neighbourhood Plan evidence base has already confirmed that the site is suitable for development and had clear support from the local community. Its absence from the final plan was a matter of timing, not technical or environmental harm. Consequently location, land use and amount of the development should be considered to be acceptable in principle.
- 7.6 As identified, significant weight should be accorded to the delivery of new housing, particularly to help mitigate the Council's acute housing land supply shortfall having regard to the Government's objective to significantly boost the supply of homes.
- 7.5 Accordingly, the benefits of the proposal development particularly in light of the shortage of housing land supply indicate that the application should be supported and the Council is therefore respectfully encouraged to approve the application.