

**Malmesbury Church of England
Primary School**

Planning Statement

Permanent Footpath and Temporary Haul Route

Final

Prepared by LUC

April 2026



Malmesbury Church of England Primary School

Planning Statement Permanent Footpath and Temporary Haul Route

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Chapter 1

Introduction

1.1 This Planning Statement has been prepared by LUC on behalf of Malmesbury Church of England (CE) Primary School (referred to as 'the Applicant' or 'the School') to accompany a full planning application for the 'Proposed Development'.

"Construction of a new path, to be used as a temporary vehicle access route during construction for the proposed extension of Malmesbury Church of England Primary School"

Overview of the Proposals

1.2 Malmesbury CE Primary School is a state school which serves the local community. A separate planning application (Ref: PL/2025/07919) has been submitted by the Applicant to extend school places from 420 to 630 places by building nine additional classrooms and associated facilities, and a multi-purpose hall along with internal alterations to the existing building. The application also proposes a new car park and vehicular access from Gleiser View, reconfiguration of the existing car park, new pedestrian and cycle routes, and landscaping improvements including new play areas and a MUGA.

1.3 Following discussions with Wiltshire Council and the consultee comments received in relation to application ref: PL/2025/07919, the need for the Proposed Development was identified to improve connectivity and maximise pedestrian permeability in Malmesbury. The Proposed Development will also be used for a temporary haul road to support the construction of the proposals detailed in application ref: PL/2025/07919.

1.4 At a meeting between the project team and Wiltshire Council in December 2025 the long term management and ownership of the footpath was discussed. It is considered that the Applicant; being neither the landowner or an appropriate organisation to manage or own a public footpath not for the private use of the school, won't be responsible for the Proposed Development post construction. It is the Applicant's position that Wiltshire Council will adopt the footpath prior to it being operational. The Applicant is open and willing to engage in discussion to progress the Proposed Development adoption by Wiltshire Council.

1.5 Both Persimmon Homes and Malmesbury Town Council are supportive of the Proposed Development. Both were engaged prior to this planning application being submitted.

1.6 The temporary construction access route will be constructed at the early stages of the construction of application ref: PL/2025/07919. It is the intention that the permanent footpath extension is constructed upon completion of the development of application ref: PL/2025/07919.

Supporting Documents

1.7 Following a review of Wiltshire Council's planning validation checklist, the planning application is accompanied by and will need to be read in conjunction with the following documents and plans:

- Supporting Cover Letter
- Application Form and Certificate of Ownership
- Location Plan
- Site/Block Plan
- Existing Site General Arrangement Plan
- Footpath - Landscape General Arrangement
- Landscape General Arrangement & School Extension Proposals
- Demolitions Plan
- Tree and Vegetation Removals Plan
- Existing and Proposed Elevations
- Existing and Proposed Section
- Design and Access Statement
- BNG Assessment
- BNG Metric
- Arboricultural Impact Assessment
- CIL Additional Information Form
- Preliminary Ecological Assessment and Protected Species Surveys
- Flood Risk and Drainage Constraints Note
- External Lighting Strategy Statement
- Footpath Lighting Layout Plan
- Planning Statement
- Tracking Plan
- Topographical Survey

Structure and Content of this Report

1.8 This Planning Statement describes the application proposal and provides an assessment of the Proposed Development in the context of relevant national, regional and local planning policy and other material considerations.

1.9 Following the introduction of the project, this report is structured as follows:

- Chapter 2 provides information on the need for the development and the background to the application site (the 'Site');
- Chapter 3 provides a description of the Site and its surroundings and planning history;
- Chapter 4 describes the Proposed Development;
- Chapter 5 sets out the national and local planning policy context and other material planning considerations;
- Chapter 6 confirms the principle of development with respect to the need for the footpath extension and temporary haul route, and it appraises the Proposed Development against the relevant planning policies with respect to technical considerations; and
- Chapter 7 summarises the Statement and the benefits it would provide, should it be granted planning permission.

Chapter 2

Need for Development

2.1 The Proposed Development is required to support the extension of Malmesbury CE Primary School proposed under application ref: PL/2025/07919 and to improve connectivity and maximise pedestrian permeability in Malmesbury.

School Extension

2.2 The Proposed Development is associated with the separately submitted planning application ref: PL/2025/07919. On this application, planning consultees, the public and elected members commented and highlighted the need for a permanent footpath extension. The Applicant is supportive of this and the benefits this will create. The footpath will form an important supporting infrastructure alongside the School extension proposal which is supported by the Wiltshire Core Strategy, the Malmesbury Neighbourhood Plan and Wiltshire School Places Strategy. Evidence for the need for the School extension is included in application ref: PL/2025/07919.

2.3 The footpath will deliver active travel infrastructure improvements reducing reliance on cars which supports local and national policies on lower carbon travel opportunities by creating safer routes.

2.4 The Proposed Development will include the provision of a temporary construction access route for the school extension proposed under application ref: PL/2025/07919. This will be in place temporarily before the permanent footpath is constructed.

2.5 Persimmon Homes; who have provided the land being used for the School extension as part of the Section 106 agreement with Wiltshire County Council (Ref. 16/06401/FUL) and are the Backbridge Farm developer, are supportive of the Proposed Development.

Consultation with Wiltshire Council

2.6 The Applicant has previously been in discussions with Wiltshire Council regarding the school extension proposal through discussions for application ref: PL/2025/07919. This included a meeting that was held with the Council in December 2025 where the need for the footpath extension was discussed. Wiltshire Council's Planning and Highways Development Management Officer stated that the permanent footpath extension is required to support the proposed school extension and connectivity in the local area.

2.7 After this meeting, correspondence between the Agent and Wiltshire Council established that the planning application detailing the permanent footpath and temporary construction access route should be submitted separately to application ref PL/2025/07919.

2.8 Correspondence from the Agent to Wiltshire Council dated 5th March 2026 stated that the Applicant will not be the long term organisation responsible for the footpath operation and management.

2.9 The Agent notified Malmesbury Town Council; who own land within the Proposed Development Site Boundary, that the planning application containing the proposals was going to be submitted. Malmesbury Town Council have been engaged in relation to the Proposed Development through planning application ref: PL/2025/07919.

Chapter 3

Application Site and Context

Site Location

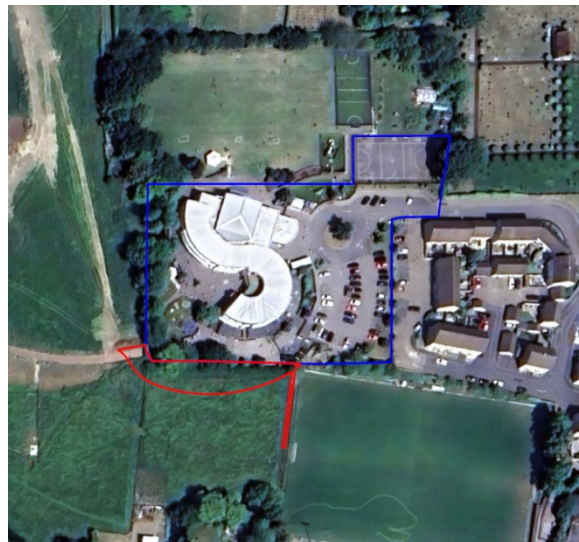
3.1 The Proposed Development is located to the south of Malmesbury CE Primary School in the north-west of Malmesbury, on Tetbury Hill, within the administrative boundary of Wiltshire.

3.2 The Site's surroundings include Malmesbury Victoria Football Club to the south-east and Backbridge Farm development to the west.

3.3 The proposals will provide public access by linking Poole Road in the east, through a footpath extension proposed under application ref: PL/2025/07919, to the Backbridge Farm development in the west. The Proposed Development will provide a link from Backbridge Farm to the wider Malmesbury urban area.

3.4 A Location Plan has been submitted to support this application and the planning application. An aerial photo of the application Site is shown in red in **Figure 3.1** below. The wider School extension is also shown in blue.

Figure 3.1 Location Plan



The Application Site

3.5 The application Site is located within the settlement boundary of Malmesbury and the Malmesbury community

area. The land that will accommodate the Proposed Development is 815m².

3.6 The Site comprises a south-facing meadow that gradually falls towards the Tetbury Avon. A large hedgerow, with occasional tree clumps, separates the school's southern boundary from the application site.

Planning History

3.7 This Proposed Development is in connection to a separately submitted planning application for the extension of Malmesbury CE Primary School ref: PL/2025/07919 which has the following description:

“Extension of Malmesbury Primary School from 420 to 630 places by building nine additional classrooms and associated facilities, and a multi-purpose hall. Internal alterations to existing building. New car park and vehicular access from Glesier Way, reconfiguration of the existing car park, new pedestrian and cycle routes, and landscaping improvements including new play areas and a MUGA.”

3.8 The Proposed Development directly abuts the school extension site boundary.

3.9 The area of land for the school extension was included in the Persimmon Homes planning application that was granted on 22 October 2021 (ref: 16/06401/FUL). This development is known as Land at Backbridge Farm and has the following description:

“Proposed Residential Development Comprising 201 Dwellings (Use Class C3) and the Provision of Land for the Potential Expansion of Malmesbury Primary School, New Vehicular Access, Public Open Space, Landscaping and other Associated Infrastructure Works.”

3.10 The Backbridge Farm development is located to the west of the Proposed Development Site boundary.

3.11 Please see other relevant planning history relevant to the Proposed Development below.

Table 3.1 Relevant Planning History

Application Reference and Decision	Description
N/03/01841/FCM – Application Granted August 2003.	Construction of a new fourteen class primary school together with car parking, sports pitches, playing areas and access road.

Chapter 4

The Proposed Development

4.1 The Proposed Development seeks full planning permission for:

“Construction of a new path, to be used as a temporary vehicle access route during construction for the proposed extension of Malmesbury Church of England Primary School.”

4.2 The Proposed Development will connect the Backbridge Farm development to the wider Malmesbury area through the construction of a new footpath extension, creating a pedestrian connection between the footpaths from the east and west of the school.

4.3 The Proposed Development also includes the temporary use of a construction haul road, and once construction is completed, the route will function solely as a pedestrian link between Sillars Green to the west and Poole Road to the east.

4.4 Further details on the design of the footpath can be found in the accompanying Design and Access Statement, however a summary of the key points is set out below.

Layout

4.5 The development of the proposals has been informed by the Site's constraints, notably the close proximity of the Malmesbury Victoria Football Pitch and sloping topography, predominantly within a flood risk zone. The DAS explains the process in finding the optimum location for the route, with multiple alternative options reviewed and discounted during the design development process. The proposal will deliver a fully accessible and well-integrated pedestrian link.

4.6 The layout has been designed to avoid existing trees and ecological features wherever possible, with minor adjustments made to accommodate level changes and drainage. The DAS provides further detail on the elements of the layout.

Scale

4.7 The Proposed Development is modest in scale and appropriate to its function. It features a single continuous pedestrian route of approximately 67m in length and 2m in width. Including associated landscape works, the Proposed Development is 815m².

Landscaping

4.8 Following the removal of the temporary haul road, the landscape strategy focuses on reinstating and enhancing the green corridor. Key components include surface treatment, soft landscape reinstatement, planting enhancements, tree removal and drainage. Landscape plans and further detail is available within the DAS.

Trees

4.9 The Site includes some lower value Category B-C2 (T85), Category U (T86) and Category C (G87) trees which will be removed to facilitate the development of the footpath extension in the east corner.

4.10 An existing hedgerow is also featured on the Site which provides screening to the school playground, while this will mostly remain in situ, a small section will be removed in the eastern corner (Category C2 - G84). Appropriate measures would also be put in place to ensure that all trees and hedgerows within close proximity to the site will be adequately protected during implementation of the works.

4.11 This is detailed in the Tree Survey prepared by SJ Stephens Associates.

Flood Risk

4.12 The Proposed Development is sited within Flood Zone 2 and 3 and so the proposal is supported by a Flood Risk Assessment and Drainage Constraints document prepared by AKT.

4.13 The proposed pedestrian footpath is of a small scale and constructed of permeable material. A formal positive drainage system is not considered necessary or proportionate and the design approach seeks to maintain existing drainage patterns so that the proposals remain neutral in terms of flood risk impact. Therefore, it would not be considered to have any adverse impact upon surface water drainage or result in any increase in flood risk. The report also details while there is some risk of surface water flooding, surface water can be drained as it would under natural conditions.

Chapter 5

Planning Policy Context

5.1 This Chapter outlines the relevant planning policy and guidance, identifying the key considerations which should be taken into account when determining the application.

Statutory Development Plan

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

5.3 The statutory development plan for the application Site comprises:

- Wiltshire Core Strategy Development Plan Document (DPD) adopted January 2015
- Saved policies of the former North Wiltshire Local Plan (adopted June 2006, saved June 2009)
- Malmesbury Neighbourhood Plan (made February 2015)

The Wiltshire Core Strategy

5.4 The Wiltshire Core Strategy was adopted in January 2015. The following policies are considered relevant to the application:

- **Core Policy 3: Infrastructure Requirements** states that in ensuring the timely delivery of infrastructure, development proposals must demonstrate that full regard has been paid to the council's Infrastructure Delivery Plan and Schedule and all other relevant policies in the plan. The policy will be delivered by the development management process, including using planning conditions and obligations to secure the delivery of infrastructure.
- **Core Policy 50: Biodiversity and Geodiversity** states that development proposals must demonstrate how they protect features of nature conservation as part of the design rationale. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. All development should seek opportunities to enhance biodiversity.
- **Core Policy 51: Landscape** states that 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.

- **Core Policy 52: Green Infrastructure** states that development shall make provision for the retention and enhancement of Wiltshire' green infrastructure network, and ensure that suitable links to the network are provided and maintained. Developers will be required to retain and enhance existing on site green infrastructure. If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality will be required.
- **Core Policy 57: Ensuring High Quality Design and Place Shaping** requires a high standard of design in all new developments, including extension, alterations, and changes of use of existing buildings. 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.
- **Core Policy 61: Transport and New Development** states that 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.
- **Core Policy 62: Development Impacts on the Transport Network** states that developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.
- **Core Policy 67: Flood Risk** states that development proposed in Flood Risk Zone 2 and 3 will need to refer to the SHLAA 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.

Malmesbury Neighbourhood Plan

5.5 The Neighbourhood Plan was made on the 25th February 2015, and comprises part of the statutory development plan for Wiltshire.

5.6 Policy 1, Land to the north west of Malmesbury, states that land is allocated for *"approximately 170 dwellings of mixed types and tenures and for an extension to Malmesbury CE School"*. The allocation is subject to the following requirements:

- a. The development shall be designed to be in keeping with the character of the historic town centre and the

overall approach to build form, street layout and landscape and to minimise any visual impact on the setting of the town and the Cotswolds AONB.

- b. The site layout shall include provision for the construction of a new bridge suitable for pedestrians and cyclists across the River Avon to Park Road and for the provision of pedestrian and cycle links to Tetbury Hill and the town centre by way of the school access and public footpath 'MALM 24'
- c. A comprehensive masterplan shall be submitted to the Local Planning Authority for approval which ensures a fully integrated and co-ordinated development.

5.7 The Policy continues that a masterplan should be submitted to the LPA to ensure a fully integrated and co-ordinated development. This masterplan has been approved with the approval of the Backbridge Farm development, and the land has been set aside for the School extension.

5.8 The masterplan also needs to maximise the pedestrian permeability in order to improve walkability in the Malmesbury extensions.

5.9 Policy 11 allocates land for the extension of Malmesbury CE Primary School.

5.10 Policy 12: Primary School expansion states that the school expansion must be in step with the demand created by housing development.

5.11 Policy 13: Neighbourhood Plan Design Guide states that all developments should take into account the Design Guide to ensure a high quality of design that respects the specific character of Malmesbury Town and the surrounding area.

5.12 Task 8.9 of the Neighbourhood Plan Design Guide states that to achieve high quality public spaces, *"pedestrian and cycle routes must link together potential destinations, such as new housing, the town centre and schools"*. It continues to set out that new routes must clearly link potential destinations, providing a safe and welcoming environment to facilitate walking and cycling.

Other Material Considerations

National Planning Policy Framework

5.13 The National Planning Policy Framework (NPPF) sets out the national planning policies for England. The NPPF was originally published in 2012 and was subsequently amended, most recently in December 2024. The relevant chapters of the NPPF are:

- Chapter 8 - Promoting healthy and safe communities
- Chapter 9 - Promoting sustainable transport

■ Chapter 12 - Achieving well designed places

5.14 Paragraph 109 states transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. The paragraph continues to set out that this should involve making transport considerations an important part of early engagement with local communities.

5.15 Paragraph 101 states that significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.

5.16 Paragraph 115 states that it should be ensured that sustainable transport modes are prioritised taking account of the vision for the Site, the type of development and its location, and that safe and suitable access to the Site can be achieved for all users.

5.17 Paragraph 117 states applications for development should *"give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas"*.

5.18 Paragraph 129 states that planning policies and decisions should support development that makes efficient use of land and takes into account "the availability and capacity of infrastructure and services - both existing and proposed - as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use."

Wiltshire Core Strategy Review

5.19 The Wiltshire Core Strategy is being reviewed to 2036. The Wiltshire Local Plan Review was submitted to the Secretary of State for Housing Communities and Local Government for independent examination on 28 November 2024.

5.20 The Council received the response from the Inspectorate on 27 February 2026 setting out the options to either withdraw the Local Plan from examination or request the Inspectors to draft a final report which would recommend non-adoption. The Council have now scheduled Cabinet and Council Meetings in May 2026 to take a report.

Planning for Malmesbury (September 2023)

5.21 Planning for Malmesbury was produced as part of the Wiltshire Local Plan review. The Shaping Priorities (PSP) sit alongside the spatial strategy for Malmesbury and one of their purposes is to describe what growth intends to help deliver and how change should be managed.

5.22 PSP2 states development is supported by infrastructure including providing for the younger population, improving

traffic congestion and parking issues, the provision of local sports and leisure, the provision of adequate early years and primary school places and improvement and protection of Green and Blue Infrastructure.

Wiltshire Design Guide (2024)

5.23 The primary aim of this SPD is to elaborate on Core Strategy Policy 57, which requires a high standard of design in all new developments

Wiltshire Local Transport Plan 2025 -2038 (LTP4)

5.24 The fourth Wiltshire Council Local Transport Plan 2025 - 2038 (LTP4) was endorsed at full council on 11 March 2025 and sets out the long-term strategic objectives and policies for transport in Wiltshire.

5.25 Policy A1 states that to avoid unnecessary travel, reduce the need to travel through enabling access to services, jobs and other destination within closer reach. The Policy continues to states that providing opportunities to access the essentials closer to home can make travel by active travel and public transport more feasible and attractive options, and can lead to travelling fewer miles overall.

5.26 Policy S1 sets outs to enable active travel to be the preferred choice for shorter journeys by improving dedicated walking/cycling routes, journey safety, access and quality.

Chapter 6

Key Planning Considerations

6.1 This Chapter describes the key planning considerations associated with the Proposed Development.

Principle of Development

Need for the Proposed Development

6.1 The Proposed Development will ensure the delivery of additional sustainable travel infrastructure for Malmesbury.

6.2 The land for the school extension has been allocated under Policy 1 of the MNP which identifies the delivery of “*approximately 170 dwellings of mixed types and tenures and for an extension to Malmesbury CE School*”. The school extension has been set aside and secured in the Section 106 agreement between the developer and the Council for the Backbridge Farm development. This agreement expires in October 2031 (ten years from the date of the agreement), after which the land will default back to Persimmon Homes for their use.

6.3 The need for the Proposed Development was identified by Wiltshire Council through planning application ref: PL/2025/07919. This planning application is a response to this request from Wiltshire Council, and local elected members and residents.

6.4 The Proposed Development will provide a direct and safe pedestrian connection between the Backbridge Farm development and Malmesbury town centre. In doing so, it accords with Core Policy 3: Infrastructure Requirements, as it responds to identified local infrastructure needs and supports the delivery of sustainable movement networks in line with the Council’s Infrastructure Delivery Plan.

6.5 The Proposed Development accords with Core Policy 61 which seeks to reduce the need to travel, particularly by private car, and to encourage the use of sustainable transport alternatives. By providing a high-quality, permanent pedestrian route between key trip generators, the Proposed Development will promote walking as a realistic and attractive mode of travel. This will support modal shift, reduce reliance on private car use and contribute positively to health, environmental and social outcomes.

6.6 The Proposed Development is needed to construct the proposals under application ref: PL/2025/07919. The temporary haul route use of the Site will only occur if application ref: PL/2025/07919 is constructed. The temporary

haul route was agreed through discussions with Wiltshire Council on application ref: PL/2025/07919 as the best option to reduce temporary construction impacts on residents in the local area. A Tracking Plan has been submitted as part of this application detailing that the proposed temporary construction routes can be achieved.

6.7 Paragraph 101 states that significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development. It is considered that the permanent footpath will create new improved active transport infrastructure of high quality that will serve existing and future residents in Malmesbury and users of the neighbouring school.

6.8 Paragraph 109 states transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. It is considered that the Proposed Development has been informed through the masterplan created as part of the Backbridge Farm development, consultation on application ref: PL/2025/07919 and policy in the MNP.

6.9 Paragraph 117 states applications for development should *"give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas"*. It is considered that the Proposed Development will improve pedestrian and cycle movements in the local area including connections to Malmesbury town centre.

6.10 Paragraph 129 states that planning policies and decisions should support development that makes efficient use of land and takes into account *"the availability and capacity of infrastructure and services - both existing and proposed - as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use."* It is considered that the Site's proposed location between neighbouring developments, its proposed BNG enhancements and limited environmental impacts, would constitute an improved use to the lands current function.

6.11 PSP2 states development is supported by infrastructure including providing for the younger population, improving traffic congestion and the provision of adequate early years and primary school places. The Proposed Development will deliver sustainable transport infrastructure improvements to application ref: PL/2025/07919, improved pedestrian permeability for local residents and reduce private car usage.

6.12 LTP 4 Policy A1 states that to avoid unnecessary travel, reduce the need to travel through enabling access to services, jobs and other destination within closer reach. Policy S1 sets identifies active travel to be the preferred choice for shorter journeys. This should be achieved through improving

dedicated walking/cycling routes, journey safety, access and quality. The Proposed Development will deliver a new dedicated pedestrian route, increasing opportunities to access amenities through improved active travel networks reducing private vehicle journeys.

6.13 The Proposed Development is intended to serve both the school extension, the Backbridge Farm development and the wider local area. The Proposed Development will only be constructed and delivered if planning application ref. PL/2025/07919 is constructed. The Backbridge Farm planning application has already received planning permission and is currently under construction. As the suitability of the site for the two neighbouring developments is accepted in the scenario the Proposed Development is constructed, it is therefore considered that the principle of development is appropriate. The Proposed Development represents a logical, coordinated and sustainable form of infrastructure provision which will support existing committed development and deliver wider community benefits.

6.14 it is intended to serve would be demonstrated should the Proposed Development be constructed, The Proposed Development is intended to serve both the school extension, the Backbridge Farm development, and the wider local area. The Proposed Development will only be constructed and delivered if planning application ref. PL/2025/07919 is approved. The Backbridge Farm planning application has already received planning permission and is currently under construction.

6.15 As such, the suitability of the site to accommodate infrastructure serving these neighbouring developments would be clearly demonstrated should the Proposed Development be constructed. Its delivery would represent a coordinated and efficient approach to meeting the identified needs arising from committed development in the area, ensuring appropriate provision is made in a sustainable and timely manner. In this respect, the Proposed Development should be afforded significant weight as it directly supports approved growth and contributes to the proper planning of the area.

6.16 Overall, the Proposed Development constitutes sustainable infrastructure that is well-related to its surroundings and delivers clear functional and planning benefits. It supports the coordinated development of the surrounding sites, delivers essential temporary construction access routes, improves accessibility, and aligns fully with the strategic objectives of the development plan. As such, the proposal is considered acceptable in principle and compliant with Core Policies 3, 61 and 62 of the Local Plan and the NPPF.

Suitability of the Site

6.17 The following alternative options were reviewed during the design development process and subsequently dismissed:

- Option 1: Access through the Malmesbury Victoria Football Club grounds and diagonally across the south meadow. Dismissed because it would be too disruptive to the Football Club and would run in close proximity to the Tetbury Avon.
- Option 2: Via Tetbury Hill and south along the access track, skirting the edge of the school sports pitch and passing through the trees north of the development site. Dismissed because large construction vehicles would struggle along Tetbury Hill, causing disruption to residents; the route would remove too much of the school playing fields; and it would require significant additional tree removals.
- Option 3: Access via the school's main entrance on Poole Road, through the existing school car park, across the Reception playground, and into the development site to the south. Dismissed because it would remove valuable playground space for the Reception year group and require further tree removals.
- Option 4: Access via the school's main entrance on Poole Road, through the playground north of the main building, around the south of the school sports pitch, and through the trees into the development site. Dismissed because it would remove valuable playground space, take out too much of the playing fields, require significant additional tree removals, and create unacceptable conflict between pupils and construction vehicles.

6.18 It is considered that the Proposed Development is the most suitable site for the proposals and accords with relevant Policy and guidance in the MNP.

Technical Considerations

Design and Landscape

6.19 Core Policy 51: Landscape states that 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.

6.20 Core Policy 52: Green Infrastructure states that development shall make provision for the retention and enhancement of Wiltshire's green infrastructure network, and ensure that suitable links to the network are provided and maintained. Developers will be required to retain and enhance existing on site green infrastructure. If damage or loss of

existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality will be required.

6.21 In Core Policy 57: Ensuring High Quality Design and Place Shaping requires a high standard of design in all new developments, including extension, alterations, and changes of use of existing buildings. 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. The Proposed Development is visually and spatially in line with the wider school and residential context, and does not introduce any visual or physical impacts beyond those typical of local pedestrian infrastructure.

6.22 The Proposed Development landscape strategy focuses on reinstating and enhancing the green corridor following removal of the temporary haul road. Key components include:

- Surface treatment: A durable, low-maintenance macadam surface, suitable for year-round use.
- Soft landscape reinstatement: Topsoil replacement and reseeded of disturbed areas with a robust native wildflower meadow mix.
- Planting enhancements: Introduction of native hedgerow and shrub planting along the route, including 3 proposed trees, to strengthen biodiversity and provide a softer edge to the path.
- Tree removal: Removal of 3 trees and a section of hedgerow.
- Drainage: Incorporation of crossfalls to manage surface water sustainably.

6.23 The Proposed Development landscape approach prioritises biodiversity, long-term resilience, and ease of maintenance for Wiltshire Council and the school in accordance with Core Policy 52, Core Policy 57 and the Wiltshire Design Guide SPD. Upon construction and completion of the footpath, it will be handed to Wiltshire Council for adoption and long term management.

6.24 The Proposed Development has been carefully designed and considered to deliver a safe and accessibly pedestrian link, including the input of specialist arboricultural and ecological advice. The Proposed Development will present as a simple, well integrated pedestrian route set within a green corridor. Its appearance is intentionally modest, reflecting its function and the surrounding school and residential context in accordance with Core Policy 51.

6.25 Key characteristics include:

- A clean, unobtrusive path surface in a macadam finish.

- Soft landscape edges that blend into the existing grassed areas and planting.
- A naturalistic, green setting that enhances the sense of openness along the southern edge of the school site.

6.26 Overall, the appearance is consistent with local pedestrian infrastructure and supports a safe, attractive, and legible east– west connection.

6.27 The External Lighting Strategy Statement submitted in support of this planning application provides detail about the installation of low-level LED bollard lighting positioned along the footpath to provide safe and uniform illumination. It details that the external lighting design has been developed in accordance with:

- BS 5489-1: Design of road lighting
- BS EN 13201: Road lighting performance requirements
- CIBSE Lighting Guide LG6 – The Exterior Environment
- ILP GN 01/21 – The Reduction of Obstrusive Light
- ILP GN 08/23 – Bats and Artificial Lighting at Night

6.28 The Proposed Development has been designed to:

- Eliminate upward light ratio (0% ULOR)
- Minimise glare through optical control
- Prevent light spill beyond the footpath boundary
- Avoid intrusion into neighbouring properties

6.29

6.30 It is considered that the Proposed Development is of high-quality design, appropriate to the local context and provides landscape and green infrastructure improvements in accordance with Core Policy 51, Core Policy 52 and Core Policy 57 and the Wiltshire Design Guide SPD.

Trees

6.31 Core Policy 52 requires development to retain and enhance Wiltshire's green infrastructure network and requires developers to retain and enhance existing on-site green infrastructure. If loss is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality will be required.

6.32 An Arboricultural Impact Assessment has been prepared by SJ Stephens. A Tree Protection Plan is at Appendix A of the report. The tree survey was prepared in accordance with the recommendations of BS 5837:2012, Trees in relation to design, demolition and construction – Recommendations.

6.33 The following trees are proposed for removal due to the Proposed Development: Category B/C T85 (Category B/C)

and (T86) Category U. Hedgerow group G87 will be removed and a section of group G84. In total, two trees, one tree group and a section of one tree group are proposed for removal to allow the best functional use of the Site.

6.34 In addition, minor directional pruning of the crown of one tree, T34, has been specified to provide clearance to the haul road and footpath. Root protection measures have been specified for the RPAs of all retained trees where required, provided in Appendix B of the report.

6.35 The new footpath and temporary haul road have been kept back from trees to provide adequate separation distances to ensure their future sustainability. The retention of established planting and trees can visually enhance a development, ensuring an appropriate relationship with the wider landscape, per Core Policy 57.

6.36 The Proposed Development therefore accords with Core Policy 52 of the Wiltshire Core Strategy.

Flood Risk and Drainage

6.37 NPPF paragraph 170 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

6.38 The River Avon, a main river, lies to the south and the Site falls within Flood Zone 2 and 3.

6.39 A meeting took place on the 2nd April 2026 between the Agent, project team and Wiltshire Council to discuss flood risk and drainage in relation to the Proposed Development.

6.40 Following the guidance within Annex 3 of the NPPF: the Proposed Development would be classified as Water-Compatible development because it is a non-residential, open-access route with no critical infrastructure or sensitive equipment. The proposed pathway is constructed from durable materials that can withstand temporary inundation during flood events without damage, ensuring safety and continuity of public access.

6.41 Detail in relation to the following drainage considerations were also presented to Wiltshire Council:

- The footpath lies within an area hydraulically connected to the floodplain, so drainage must not increase flood risk on-site or elsewhere.
- Due to the small scale and permeable surrounding landscape, no positive drainage is proposed; runoff will shed naturally onto adjacent grassed areas.
- Existing ground levels will be fully maintained to avoid loss of floodplain storage and preserve natural overland

flow routes and the footpath will follow existing ground levels.

- Positive drainage systems are not necessary or proportionate; the design maintains natural drainage patterns and ensures a neutral flood risk impact.
- The temporary haul road will follow existing levels, with construction-phase surface water management in place; it will be removed and reinstated as a pedestrian route after works.

6.42 Wiltshire Council accepted the findings presented in relation to the Proposed Development at this meeting. It was agreed that a supporting Flood Risk Assessment and Drainage Strategy was not required in support of the planning application.

6.43 The Proposed Development is considered to be an appropriate development in an area at risk of flooding and is in accordance with paragraph 170 of the NPPF.

Ecology and Biodiversity Net Gain

6.44 Core Policy 50: Biodiversity and Geodiversity states that development proposals must demonstrate how they protect features of nature conservation as part of the design rationale. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. All development should seek opportunities to enhance biodiversity.

6.45 Core Policy 52: Green Infrastructure states that development shall make provision for the retention and enhancement of Wiltshire' green infrastructure network, and ensure that suitable links to the network are provided and maintained. Developers will be required to retain and enhance existing on site green infrastructure. If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality will be required.

Habitats and Species

6.46 IES Consulting have carried out a PEA for the proposal, which is submitted with this planning application. A UK Hab habitat survey and associated desk study was carried out to current best practice guidelines, which also informed the BNG Assessment.

6.47 The desk study and survey work have identified the site as being of low ecological value. The proposals have the potential to lead to biodiversity enhancement on the site. The report sets out recommendations for the protection of protected species and further surveys that are to be carried

out to ensure there are no adverse impacts on protected species.

6.48 The Proposed Development lighting scheme has been designed to minimise ecological and environmental impact by:

- Using warm white LED light (2700K)
- Eliminating upward light
- Directing light only onto the footpath surface
- Minimising spill onto adjacent vegetation, hedgerows or habitats
- Avoiding root protection zones (based on the arboriculturist's tree protection plan)

Biodiversity Net Gain

6.49 IES Consulting have undertaken a BNG Assessment using the appropriate Defra metric.

6.50 The survey and analysis using the Biodiversity Metric tool found the site baseline to be 0.29 Habitat Units and 0.25 Hedgerow Units. The proposals to redevelop the site including landscaping will deliver an additional 0.29 Habitat Units and 0.03 Hedgerow Units. This change in Habitat Units represents a Biodiversity Net Gain increase of 102.03% Habitat Units and 12.51% Hedgerow Units which exceeds the national target of 10%.

6.51 The report sets out an additional requirement for a sensitive lighting scheme to retain dark corridors at the perimeter of the site. It is considered that the lighting scheme proposed responds to these requirements.

6.52 The Proposed Development would therefore accord with Policy 50 and 52 of the Wiltshire Core Strategy, the provisions of the NPPF and the mandatory requirement for BNG under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

Temporary Traffic Impact

6.53 Core Policy 62: Development Impacts on the Transport Network states that developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.

6.54 The Proposed Development proposes a temporary haul road to provide construction vehicle access for the new associated Malmesbury CE Primary School extension planning application (ref: PL/2025/07919). This need for this haul route has been identified to manage construction traffic and avoid unacceptable conflict between pupils, residents and construction vehicles that would arise from alternative routes considered as part of the school extension proposals. The

chosen Site maximises connectivity with the adjoining land areas.

6.55 Paragraph 109 of the NPPF requires a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. The paragraph continues to set out that this should involve making transport considerations an important part of early engagement with local communities. The need for the Proposed Development was raised locally in consultee comments from the associated Malmesbury CE Primary School extension planning application ref: PL/2025/07919. The haul road as proposed is in response to comments from Wiltshire Council, and local elected members and residents.

6.56 The Proposed Development therefore accords with Core Policy 62 of the Wiltshire Core Strategy and the NPPF.

Chapter 7

Conclusions and Summary

7.1 This Planning Statement has been prepared by LUC (the Agent) on behalf of Malmesbury CE Primary School (the Applicant), in support of the planning application for the Proposed Development:

“Construction of a new path, to be used as a temporary vehicle access route during construction for the proposed extension of Malmesbury Church of England Primary School”

7.2 This Planning Statement should be read in conjunction with the other reports and documents which accompany this planning application, notably the Design and Access Statement.

7.3 In accordance with the policy review set out in Chapter 5 of this document, the Proposed Development would comply with the relevant national, regional and local planning policy and deliver improvements to connectivity and active travel infrastructure in Malmesbury.

7.4 The Proposed Development has been designed to prioritise biodiversity, long term resilience and ensures that it is in keeping with the setting of the surrounding school and residential context. It has been designed to ensure it is suitable and appropriate for future handover and adoption by Wiltshire Council prior to operation.

7.5 This statement demonstrates that the proposed development complies with the NPPF and Local Plan policy and therefore should be approved.