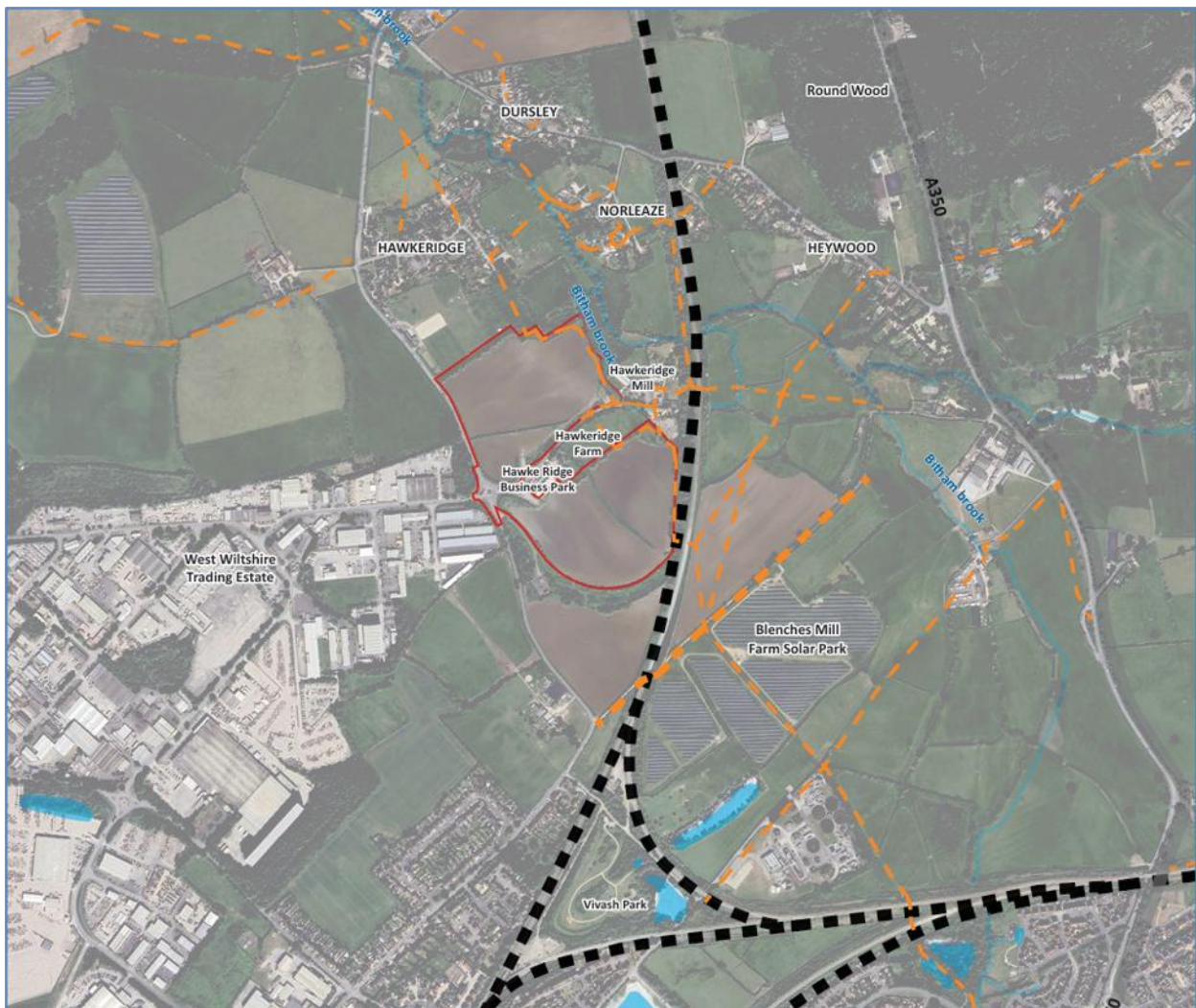

Planning Statement

Applicant: Hawke Ridge Business Park Ltd and Bellway Homes Ltd

Date: July 2026

Site: Hawke Ridge Business Park, Westbury BA13 4LD

Proposal: Erection of: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works.



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- 1.0 Introduction
- 2.0 Relevant background information
- 3.0 Description of proposals
- 4.0 Planning policy context
- 5.0 Planning assessment
- 6.0 Planning balance and conclusion

1.0 Introduction

- 1.1 PlanningSphere act for Hawke Ridge Business Park Ltd (NB. the landowner and prospective commercial developer) and Bellway Homes Ltd (NB. the prospective residential developer).
- 1.2 The joint applicants have instructed the submission of a full planning application proposing a comprehensive development of Hawke Ridge Business Park (HRBP) comprising: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive-through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works.
- 1.3 The mixed-use planning application scheme has been formulated following the failure to attract employment occupiers to commit to the site. This follows a sustained 12+ year period of site marketing with the benefit of: (i) a development plan allocation for employment; (ii) an extant outline planning permission for employment; (iii) significant upfront investment in site infrastructure including a 4-arm roundabout and access spurs to the north and south land parcels and an on-site foul drainage pumping station and rising main connection to the Westbury sewage treatment works; and (iii) advance planting of perimeter green infrastructure.
- 1.5 The landowner, via their marketing agents, submitted a pre-application enquiry in respect of a mixed-use residential-led proposal in 2024. Following the eventual receipt of pre-application advice in December 2025, Bellway Homes agreed terms with HRBP Ltd to jointly progress a full planning application submission and deliver the proposals.
- 1.6 The application proposal has been informed by baseline surveys across a range of technical disciplines, market testing, an Environmental Impact Assessment (EIA) screening opinion request, a process of pre-application engagement with Natural England, and local community and stakeholder engagement, as summarised in the Statement of Community Involvement.
- 1.7 This statement sets out: relevant background information, including a full overview of the planning history of the site and adjacent sites, and summary of marketing history; a summary of the full application proposals; the planning policy context; and planning assessment including the matters relating to the principle of development, matters covered by Environmental Statement, and other technical assessments, proposed s.106 Heads of Terms; and a planning balance and conclusion section.
- 1.8 The scope of full planning application is set out in the submitted Validation Schedule and comprises the following information:
 - Planning application fee: £105,336.00¹ plus a £91.00 Planning Portal administration fee
 - Planning application forms, CIL Form, ownership certificate and notices: PlanningSphere
 - Site Location Plan: Pegasus
 - Site-wide Architectural Drawing Pack (12 No. Plans): Pegasus
 - House Type Drawing Pack (62 No. Plans): Pegasus
 - Non-Residential Drawing Pack (11 No. Plans): Angus Meek Architects
 - Access Drawing Pack (2 No. Plans): IMA Transportation Planning
 - Engineering and Drainage Drawing Pack (38 No. Plans): Tumu Consulting
 - Landscape Drawing Pack (20 No. Plans): Greenhalgh LA

¹ Full planning application fee calculated on the basis of 249 dwellings plus the total non-residential floor space 4,191 sqm GEA
PlanningSphere Limited, Spaces Northgate House, Upper Borough Walls, Bath BA1 1RG www.PlanningSphere.co.uk T: 07827944638
Registered in England at the above address Company number 8817487 VAT number 177 6172 78

- Landscape Visualisations: Greenhalgh LA
- Tree Protection Plan: Assured Trees
- Solar PV Specification Sheet for Commercial Development: DMEGC
- Environmental Statement (17 No. Chapters², Technical Appendices and a Non-Technical Summary): coordination by Entran with input from the wider multidisciplinary consultant team
- Agricultural Land Classification Statement: LRA
- Arboricultural Impact Assessment: Assured Trees
- Arboricultural Method Statement: Assured Trees
- Biodiversity Net Gain Report and Metric (Excel Spreadsheet): Ethos Environmental
- Design and Access Statement: Pegasus / Angus Meek Architects
- Economic Benefits Report: Greengage
- Education Impact and Mitigation Statement: EHP
- Energy Strategy: AES
- Fire Statement: Bellway Homes
- Flood Risk Assessment and Drainage Strategy: Tumu Consulting
- Flood Risk Sequential Test: DPP
- Heritage and Archaeology Statement: Bristol and Bath HC
- Landscape Design Statement: Greenhalgh LA
- Lighting Impact Assessment: DfL
- Market Advice Report: Knight Frank
- Planning Statement: PlanningSphere
- Retail Assessment: Grass Roots Planning
- Shadow Habitat Regulations Assessment: Ethos Environmental
- Statement of Community Engagement: Conversation PR
- Transport Assessment and Travel Plans: IMA Transport Planning
- Waste Minimisation Statement: PlanningSphere
- Accommodation Schedule: Pegasus / Angus Meek Architects
- Validation Schedule: PlanningSphere

² Specialist ES Topic Chapters include: Transport and Access; Air Quality; Noise and Vibration; Landscape and Visual Amenity; Ecology and Biodiversity; Water Quality, Hydrology and Flood Risk; Soils, Geology and Contaminated Land; Archaeology and Cultural Heritage; Socio Economics, Population and Human Health; and Climate Change

2.0 Relevant Background Information

(i) Site Location and Context

- 2.1 HRBP is located approximately 1.5km north of Westbury town centre and 5km to the south of Trowbridge and is defined as strategic employment land in the adopted Wiltshire Core Strategy (WCS) under Policies CP2 and CP32. The site comprises the existing four-arm roundabout and two parcels of arable agricultural land totalling 14.58ha.



Figure 1: Extract from Site Location Plan

- 2.2 The site lies within the A350 corridor route near to the employment sites of West Wiltshire Trading Estate and the White Horse Business Park, Trowbridge. The site is located 100 metres east of the West Wilts Trading Estate and 2km south of the A350/ A363 junction near Yarnbrook. It is bound by Hawkeridge Road to the west (B3097), a railway line to the east,

and agricultural land to the north and south. Westbury Railway Station lies approximately 1.3km to the south of the site.

- 2.3 The site is accessed from the B3097 via a four-arm roundabout. The B3097 forms one of the main connecting routes into Westbury to the south. Via this route, the site links to the A350, which is one of the primary north-south vehicular movement routes between Chippenham and the M4 Junction 17 in the north and the A36 in the south. The nearest bus stops are within 400m of the site on the B3097. Further information on the site accessibility and location is set out in the ES Chapter 7: Transport and Access and Transport Assessment.
- 2.4 There is an extensive existing public footpath network that connects the site to wide countryside. HEYW6 (part), HEYW7 and HEYW8 (part) were subject to a Stopping Up and Diversion Order that was considered at appeal. An Order Decision was issued on 23rd March 2017 (Order Ref: FPS/Y3940/5/5). The proposed development has been designed to align with the Order and when implemented the Council's Definitive Map will be updated to reflect the Order Decision, as illustrated in plan shown in Figure 2 below.

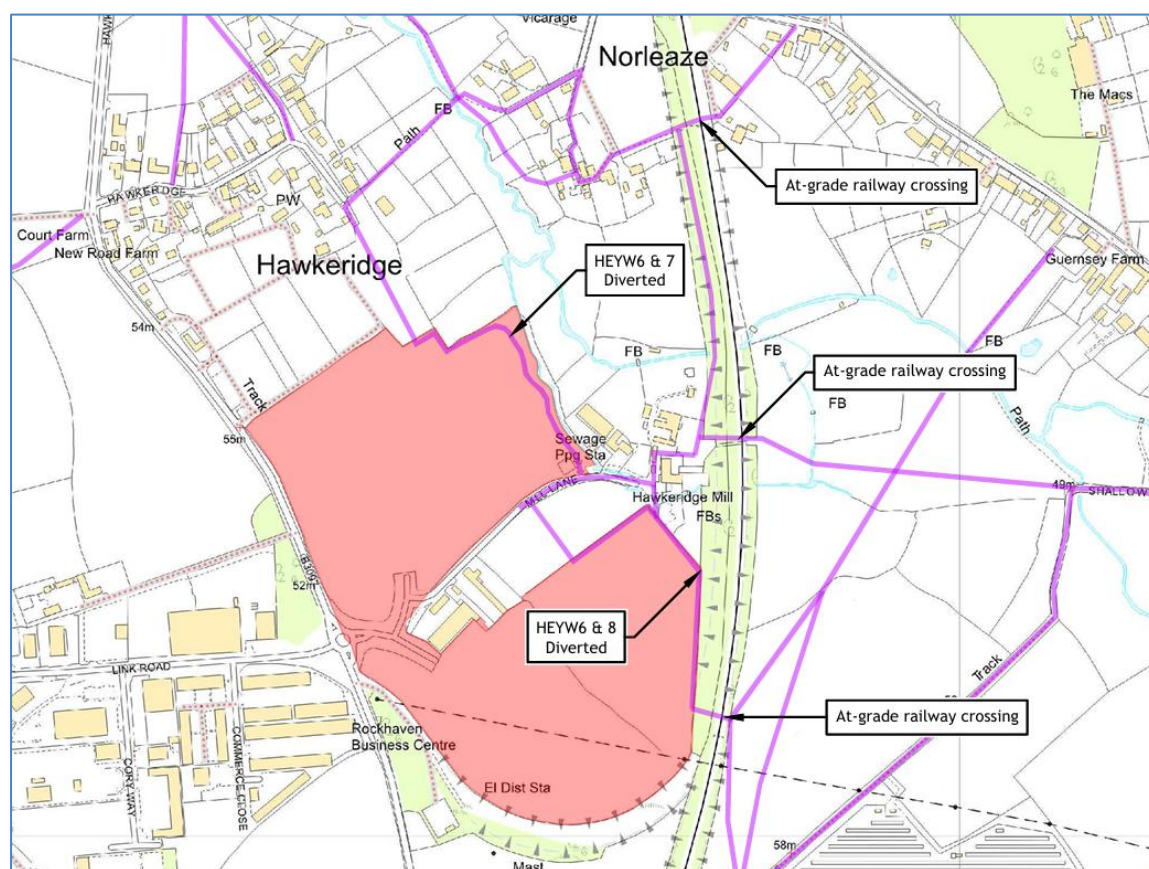


Figure 2. Extract from the Public Rights of Way Plan appended to the Transport Assessment

- 2.5 The Site has been classified as subgrade 3b in the Agricultural Land Classification Report, which notes the high topsoil clay content and poor drainage, which means that the land is generally too wet for spring machinery land access and arable cropping, and is therefore largely limited to autumn sowing.
- 2.6 The Site is bisected by Mill Lane with the proposed development split across two areas either side of the road. Located on Mill Lane between these two development areas is the grade II listed Hawkeridge Farmhouse and its associated residential curtilage and ancillary

outbuildings, Hawkeridge Barn (NB. now a residential dwelling), and a group of existing employment buildings. For further information on the heritage context refer to ES Chapter 14: Archaeology and Cultural Heritage.

- 2.7 The two parcels of land are mostly enclosed by vegetation, physically and visually containing the site with defensible boundaries. Part of the existing perimeter vegetation is 'advanced planting' associated with the partial implementation of outline planning permission 15/04092/VAR – see planning history below. For further information on the site topography and landscape context refer to ES Chapter 10 – Landscape and Visual Amenity.
- 2.8 The B3097 Hawkeridge Road forms the western boundary of the Site. There is hedgerow to the northern boundary. The eastern boundary is defined by Bitham Brook and southern boundary is defined by the embankment of a previously dismantled railway siding that was constructed during the Second World War to service munitions factories on what is now the West Wilts Trading Estate.

(ii) Application Site Planning History and Lawful Use

- 2.9 Hawke Ridge Business Park is allocated in the Council's Core Strategy (2015) for a mix of B class employment uses under Core Policies 2 and 34. The lawful use of the site, as existing, is agricultural land.
- 2.10 Recorded planning history on the Council's public access system for Hawke Ridge Business Park includes the following decisions:

Reference	Description	Decision
PL/2026/02393	EIA screen opinion request in respect of current mixed-use proposal	EIA Required 01.06.2026
PL/2021/09252 Amazon	Development of a new industrial warehouse (Use Class B8) with ancillary office and associated parking, van storage, van staging areas and ancillary infrastructure.	Withdrawn 31.03.2023
17/01201/REM HRBP NB. extant	Reserved Matters application relating to appearance, landscaping, layout, and scale: (15/04092/VAR): Erection of 20 No. commercial units (numbers 1-12 and 14-21) (Class B1, B2 and B8) and associated works	Permitted 20.07.2017
16/12236/FUL HRBP NB. Lapsed	Erection of 1 drive through retail unit (Class A5/A3); 3 retail units (Class A5); and 1 convenience store (Class A1) and associated works.	Permitted 21.04.2017
16/06752/REM HRBP NB. Extant	Application for approval of reserved matters relating to appearance, landscaping, layout and scale (15/04092/VAR Erection of 4 No. Warehouse Units -Use Class B8- and associated works).	Permitted 10.11.2016
16/06637/ADV HRBP Implemented	2 x internally illuminated entrance signage to Hawke Ridge Business Park, Westbury	Permitted 08.08.2016
15/04092/VAR HRBP NB. implemented	Variation of condition 10 of planning permission 14/10780/VAR relating to archaeological works	Permitted 30.07.2015
15/01093/FUL HRBP NB. Implemented	Formation of new vehicular turning head and associated works– discharge of condition 2 – maintenance plan	Permitted 04.01.2016
14/10780/VAR HRBP NB. Superseded	Variation of condition 3 of planning permission 14/03118/OUT to enable the development to be implemented on a phased basis.	Permitted 22.12.2014
14/07418/ADV HRBP	Sale/letting board for new Hawkeridge Business park recently consented under W/03118/OUT	Permitted 29.04.2014
14/03182/FUL HRBP NB. Implemented	Erection of pumping station.	Permitted 26.09.2014
14/03118/OUT HRBP NB. Superseded	Formation of new business park (Class B1, B2 and B8) access and associated works.	Permitted 26.09.2014

Table 1. Site Specific Planning History

- 2.11 The four arm roundabout and associated landscaping works were implemented pursuant to a variation to the original outline planning permission (Ref: 15/04092/VAR). The drainage infrastructure and associated pumping station were implemented pursuant to planning permission 14/03182/FUL.
- 2.12 Condition 5 of the implemented outline planning permission 15/04092/VAR references at total ceiling of employment floorspace of 45,520 sqm of which no more than 12,000 sqm would be Class E (formerly Class B1). However, by virtue of the expiry of the reserved matters time limit condition i.e. it is no longer procedurally possible to submit any further reserved matters applications pursuant to the extant OPP 15/04092/VAR.
- 2.13 Various reserved matters and full application for roadside uses were secured speculatively to support the marketing of the site. Two of the reserved matters permissions for employment units remain extant: 17/01201/REM and 16/06752/REM.
- 2.14 The Amazon application (PL/2021/09252) for the northern plot protracted due to a combination of case officer mal-administration and excessive delays relating to ecology consultation responses. As a consequence, Amazon withdraw their application resulting in a significant loss of inward investment.
- 2.15 On 1st June 2026, the Council confirmed, contrary to expectation, that the proposed development would require EIA (PL/2026/02393). In its screening assessment the Council cited, in the absence of detailed information and reports, potential significant effects in relation to: (i) ecology impacts upon the Bath and Bradford on Avon SAC for Bats and the Picket and Clanger Woods SSSI/Ancient Woodland; and (ii) traffic generation and associated impacts upon the Westbury Air Quality Management Area (AQMA).
- 2.16 In the interest of expediency, the applicant team decided to accept the Council's decision on a without prejudice basis and are committed to submitting a full planning application with an Environmental Statement as scoped out in the Validation Schedule.

(iii) Surrounding context: planning history, pending and emerging schemes

- 2.17 The planning history relating to permitted, pending and emerging schemes, and the site's proximity to the West Wiltshire Trading Estate, North Acre and Brook Lane employment areas, which supports 4,890 employees across all three employment areas³. This represents an important part of the spatial context within which the application site is located.
- 2.18 The wider planning context of permitted and proposed schemes adjacent to The Site, and to the northwest of Westbury, is illustrated in Figure 3. The associated analysis of the site specific and wider planning history, which is highly relevant to the assessment of the application proposal, is set out in subsections (iii)- (vi) below.

³ Source: *Business Register and Employment Survey Data, ONS via NOMIS (2024)*

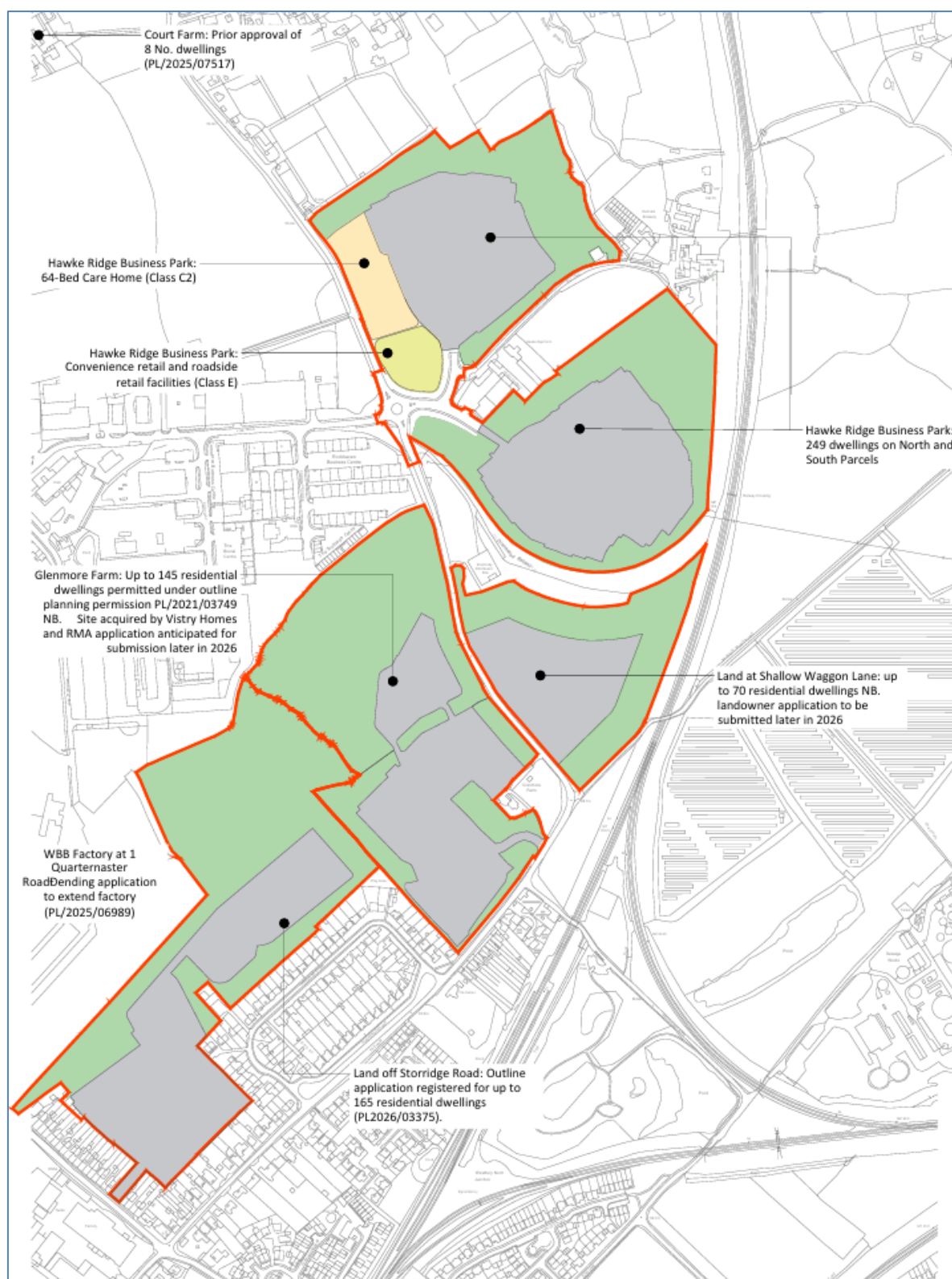


Figure 3. Extract from Cumulative Plan showing permitted, pending and proposed residential sites to the NW of Westbury

(iv) Land at Glenmore Farm PL/2021/03749 & APP/Y3940/W/24/3345598

2.19 Details of the Glenmore Farm decision are summarised in the table below:

Reference	Description	Decision
PL/2021/03749 PINS Ref: 2245598	Residential development (use class C3) for up to 145 homes, community orchard, children's play areas (LEAP), tree planting, habitat creation and ecology buffers and mitigation; site drainage and associated infrastructure. All matters reserved except for access.	Refused 11.03.2024 Appeal allowed 21.01.2025

Table 2. Glenmore Farm Planning History



Figure 4: Extract of Glenmore Farm Illustrative Masterplan showing location of this residential scheme to the south west of the Hawke Ridge Business Park application site and to the south of the West Wilts Trading Estate.

- 2.20 The appeal was allowed on the grounds of lack of housing land supply and application of the tilted balance 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.
- 2.21 The Glenmore Farm Statement of Common Ground confirms that the area is a sustainable location with accessible walking and/or cycling routes into the town, and its services and facilities. It is notable that The Site is located closer to north and south bound bus stops on the Hawkeridge Road than the Glenmore Farm site.
- 2.22 Several iterations of the Illustrative Masterplan were submitted to WC by the appellant to address concerns regarding design, ecology and noise. A Noise Impact Assessment prepared by Stantec was submitted as part of the planning application in 2021 and updated in 2022. Discussions took place on noise given the proximity of the site to the West Wilts Trading Estate to the north and other traffic related noise. The appellant sought to demonstrate in the Illustrative Masterplan that a layout could be achieved where noise levels would remain within good practice guidance levels without the need for bunds or high acoustic fencing. This was accepted by the Inspector through the use of planning conditions.
- 2.23 The Inspector's decision letter includes a section on living conditions for future residents. Para 22 of the decision letter states that:
- 22. The indicative layout has been designed to ensure that living conditions for future residents would be suitable, in specific relation to noise from the nearby trading estate, nightclub and traffic. This is through embedded mitigation and a suitable layout. The Council's Public Protection team have not raised objections, subject to planning conditions, that would control internal and external noise levels. These would ensure that windows in habitable rooms could be opened and would not rely on mechanical ventilation. This would be necessary to ensure suitable future living conditions, and based on the evidence before me, this would be secured [conditions 13 and 14].*
- 2.24 Conditions 13 and 14 in the appeal decision relate specifically to noise mitigation. However, similar conditions are unlikely to be required for application proposal as it is located further away from the general industrial units on the WWTE.
- 2.25 Para 23 of the decision letter references potential odours in this location:
- 23. Claims of odour from a nearby resource recovery centre were raised. That site is subjected to a permit from the Environment Agency and odour is regulated through the agency. The site is further away from the source than existing dwellings, and although future residents may be subjected to unpleasant odours from time to time, this would not lead to unacceptable future living conditions.*
- 2.26 At the time of writing it is understood that Vistry Homes have entered into an agreement to acquire the land and it is anticipated that a reserved matters application will be submitted later in 2026.

(v) Land off Storridge Road, Westbury PL/2022/09842 & APP/Y3940/W/24/3340811

- 2.27 This site comprises c. 9.92ha of agricultural land between The Ham/Hawkeridge Park and West Wiltshire Trading Estate, to the north of the Glenmore Farm site.
- 2.28 Planning application PL/2022/09842 was refused on 16th February 2024 and dismissed at appeal APP/Y3940/W/24/3340811 on 30th August 2024. The description is as follows:

Outline application for the demolition of number 13 and 14 Storridge Road and the erection of up to 200 dwellings (including affordable housing), with public open space, structural planting, landscaping, and sustainable drainage system (SuDS) and vehicular access point. (All matters reserved except for means of access)

- 2.29 The outline application was dismissed for 7 No. reasons including: conflict with the Council's spatial strategy; insufficient information regarding the ability of the site to accommodate 200 dwellings including affordable housing; proximity to West Wiltshire Trading Estate and implications for adverse impacts on future residents from noise; inadequate storm/surface water discharge solution; insufficient information regarding Appropriate Assessment particularly with regard to bat mitigation; inadequate information to demonstrate no net loss of biodiversity or that the scheme could deliver the BNG proposed; and a failure to provide and/or secure any mechanism to ensure that the provision of essential infrastructure, services and amenities made necessary by the development could be delivered.
- 2.30 The reasons for refusal fell away at appeal apart from housing land supply and the dispute regarding whether the proposed areas allocated for built development would be acceptable with regard to ecological and noise concerns.
- 2.31 In the planning balance, the Inspector stated that the proposal failed to comply with the Council's spatial strategy and that there would be significant adverse effects regarding the living conditions of the future occupiers of the development with regard to noise from the WWTE. It was noted that the trading estate has very few restrictions on noise (although the additional noise arising from the Venom nightclub would be extremely limited in terms of harm to the living conditions of future residents due to infrequency of outdoor licenced events). The Inspector concluded that it had not been satisfactorily demonstrated that the proposal would not create potential future risks to the operation of the WWTE i.e. the agent of change principle.
- 2.32 Regarding ecology, the Inspector concluded that the proposal would not harm the integrity of the Bat SAC, either alone or in-combination with other projects and that the site had the capacity to accommodate proposed ecological works.
- 2.33 The Council stated under cross-examination at the Inquiry that if the Inspector found no harm against ecology and a tilted balance, then the appeal should be allowed. However, the Inspector did not agree. This was because of the adverse impacts of the proposal due to the poor quality of accommodation that would be provided with a significant proportion of the proposed dwellings required to be closed windows for significant periods of time to create adequate living conditions.
- 2.34 A revised outline planning application was submitted in May 2026 for up to 165 No. dwellings was registered in June 2026. This proposal includes a more extensive area of public open space than the previously refused scheme. A summary of the Planning History for Land off Storridge Road is set out below:

Reference	Description	Decision
PL/2026/03375	Outline application for 165 No. dwellings and associated works	Pending
PL/2022/09842 PINS Ref: 3340811	Demolition of number 13 and 14 Storridge Road and the erection of up to 200 dwellings (including affordable housing), with public open space, structural planting, landscaping, sustainable drainage system and vehicular access point.	Appeal dismissed 30.08.2024

Table 3. Land off Storridge Road Planning History

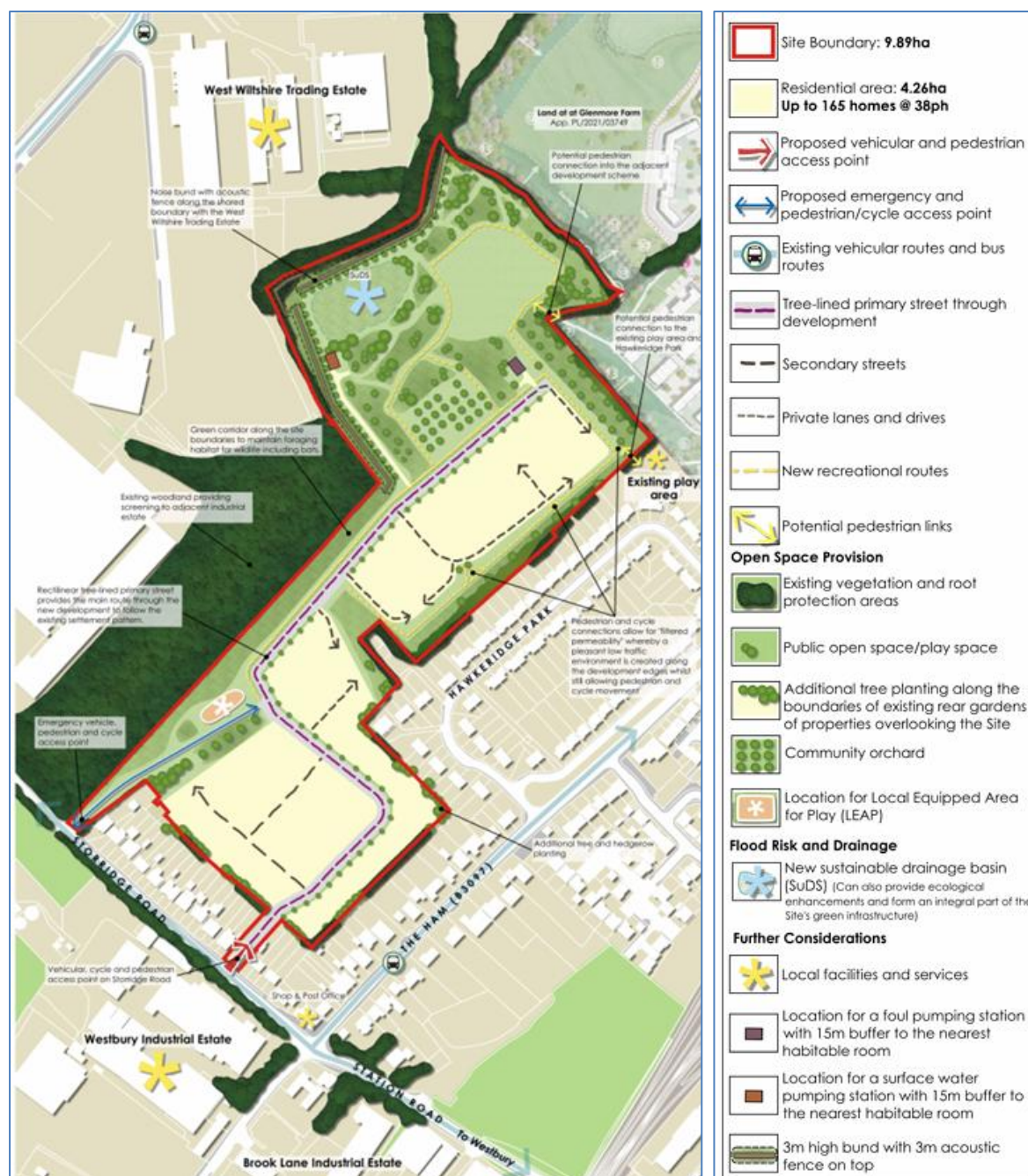


Figure 5: Extract of illustrative masterplan for the Land off Storridge Road – 2026 pending application

(vi) Land at Shallow Waggon Lane

- 2.35 The owner of the arable land to the south of The Site, which is accessed from Shallow Waggon Lane, is promoting a scheme of circa 60-70 dwellings. It is understood that a speculative outline planning application will be submitted in later in 2026.

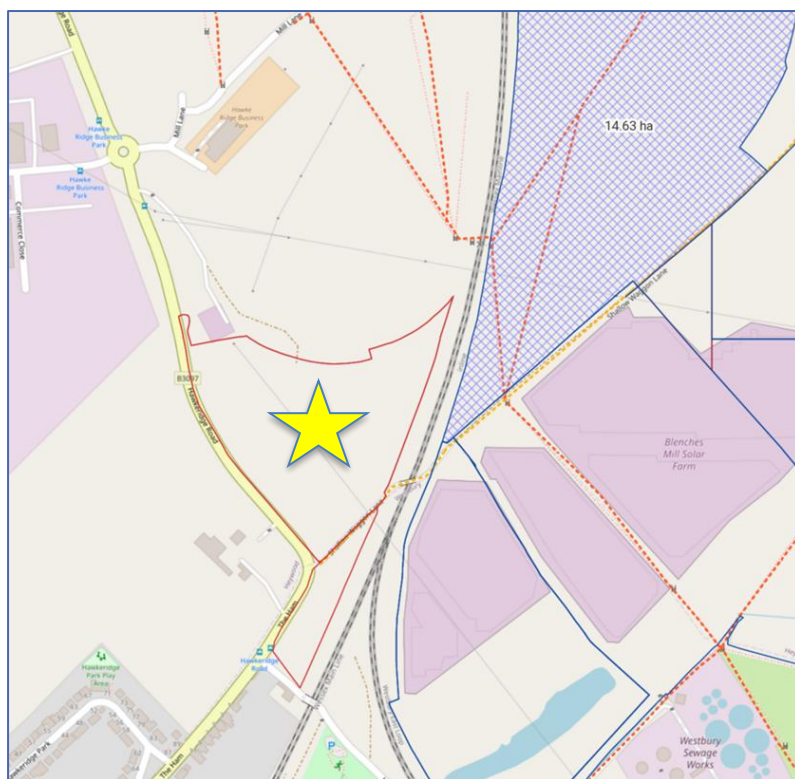


Figure 6: The land at Shallow Waggon Farm, which is being promoted for residential development, is identified by the yellow star and outlined in red

(vii) Land at Court Farm

- 2.36 Court Farm, which lies approximately 600m to the north west of HRBP roundabout, has been subject to following decision, albeit for a relatively minor residential proposal.

Reference	Description	Decision
PL/2025/07517	Prior approval for the conversion of barns to 8 dwellings.	Permitted 22.12.2025

Table 4. Land at Court Farm Planning History

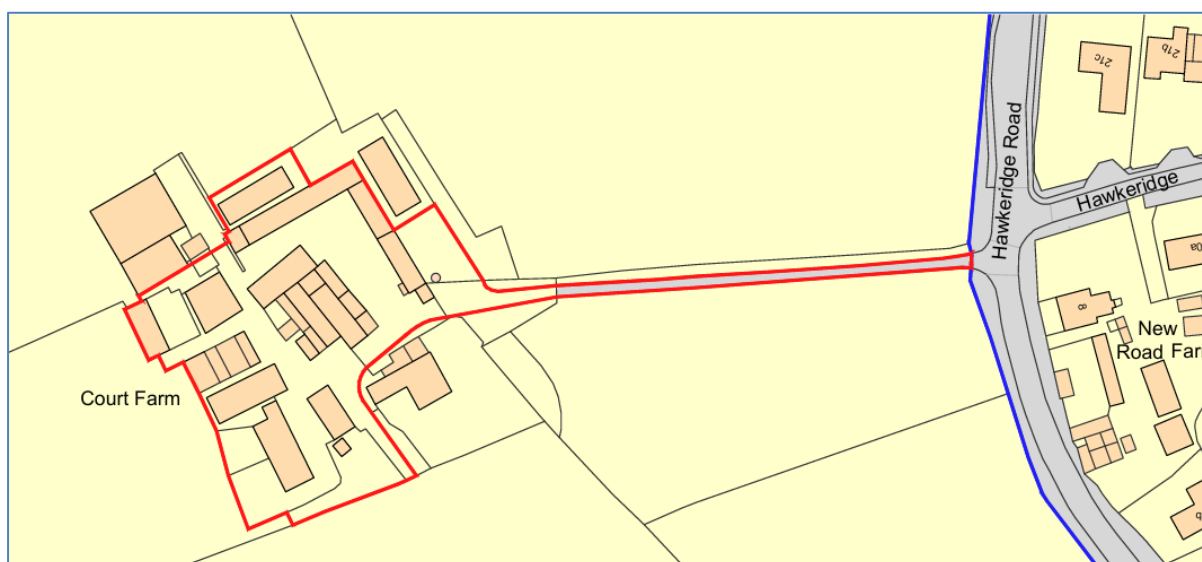


Figure 7. Land at Court Farm – a permitted barn conversion scheme of 8 No. units to the NW of HRBP

(iv) Application Site Pre-application Enquiry ENQ/2024/01667

- 2.37 A pre-application enquiry supported by a Vision Document and a Marketing Report was submitted by Carter Jonas on behalf of HRBP Ltd in November 2024.
- 2.38 In October 2025, the planning case officer provided individual internal consultation responses. A final over-arching response from the Planning Officer was received on 19th December 2025. It is notable that the written advice was issued prior to withdrawal of the Regulation 19 Local Plan, as fully documented in the Planning Policy Section 4.0 below.
- 2.39 A summary of the issues raised in the pre-application advice is set out below with applicant comments:

Pre-application Advice (ENQ/2024/01667)	Applicant comments
The mixed-use proposal constitutes a Local Plan departure and conflicts with WCS Policies 2 & 32 The NPPF's 'tilted balance' would not apply on grounds of potential impacts on designated heritage assets, protected species and flood risk pursuant to footnote 7.	The Environmental Statement (ES) has robustly assessed the technical impacts of the proposal. The ES concludes, when account is taken of the proposed mitigation, there will be no significant effects. On this basis, the NPPF's 'tilted balance' is applicable to the determination of the application proposal, as explained in Section 5.0. The planning 'tilted balance' assessment set out in Sections 5.0 and 6.0 of this statement makes the case that planning permission should be granted pursuant to Paragraph 11dii of NPPF.
Employment Land Review 2023 (ELR) recommends resisting change of use proposals on allocated employment sites. The ELR evidence base for Emerging Local Plan (ELP) supports the rolling forward of the employment allocation.	The emerging Local Plan has now been withdrawn – refer to the planning policy Section 4.0 of this Statement. The pre-application advice did not engage with the submitted site-specific marketing evidence. The ELR, which was prepared as part of the now withdrawn ELP, is out of date, and a new evidence base will be required to support the new Wiltshire Local Plan. An analysis of the site marketing, an overview of the employment land market, and site-specific viability appraisals, is set out in the Market Advice Report prepared by Knight Frank, which supports the concerns raised by the Local Plan Inspectors. On this basis the ELR (2023) is considered to be an outdated document which should not be ascribed any weight in the assessment of this planning application. The Knight Frank analysis and evidence conclusively demonstrates that the employment allocation is unviable and that The Application site is not required to meet the longer-term employment land supply needs.
Risk of coalescence	This comment is not considered to be well founded in spatial planning terms noting the substantial gap from the northern boundary of the site to Hawkeridge Village, and the defensible boundary to east defined by the Bitham Brook. Figure 3 (above) shows the emerging spatial context of permitted and proposed residential schemes to the north west of Westbury.
Unsustainable location: i.e. lack of suitable walking and cycle routes to local schools and facilities	This comment is comprehensively addressed in the Transport Assessment, which demonstrates that the proposal (with mitigation) is acceptable in terms of

	locational sustainability and will provide genuine active travel opportunities and access to public transport. The Education Report discusses the travel to school matter.
Requirement for high standard of design in compliance with WCS Policy 57, the Wiltshire Design Guide SPD (2024), Building for a Healthy Life (HE), and the National Design Guide	The proposal follows best practice in placemaking and is in compliance with Future Homes Standards. Refer to the DAS and Landscape Design Statement.
Climate change and sustainable construction guidance.	Refer to the submitted Energy Strategy, which demonstrates the approach to sustainable construction.
Heritage – justification for setting impact required	The design process has taken into the account the setting of the grade II Hawkeridge Farmhouse. The fallback position of the employment allocation and extant RMA approvals is also a material consideration. Refer to ES Chapter 14 (Cultural Heritage) and the technical appendices which sets out a comprehensive heritage impact assessment.
Archaeology – notes the evaluation completed in September 2011 and recommends the provision of a Written Scheme of Investigation (WSI)	No pre-determination archaeology is required. Refer to ES Chapter 14 and the technical appendices
Residential Amenity – WCS Policy 57 requires a high standard of amenity for existing and future occupiers	The scheme has been designed to deliver a high standard of residential amenity for future occupiers and preserve the amenity of existing nearby residents. Refer to the DAS.
Air Quality, Noise and Odour assessments	Refer to ES Chapter 8 (Air Quality) and ES Chapter 9 (Noise and Vibration). Odour has been scoped out on the basis the Westbury Sewage Treatment Works lies further than 500m from the southern site boundary.
Highway safety, locational sustainability and parking advice	The access and movement strategy, as assessed in ES Chapter 7, and the Transport Assessment, has conclusively demonstrated that the proposal, with mitigation, can be accessed safely and has an appropriate level of non-car accessibility. Parking provision for the residential and commercial elements of the proposal will be provided in compliance with the Council's maximum parking standards.
Ecology and biodiversity advice pursuant to WCS Policy 50, Trowbridge and Westbury Bat Mitigation Strategy, and to note proximity of the Clanger Wood SSSI.	The proposal has been informed by seasonal ecology surveys and consultation with Natural England. An ecology assessment is set out in ES Chapter 11 (Ecology and Biodiversity). The proposal is also supported by a Biodiversity Net Gain Assessment demonstrating compliance with mandatory BNG and a shadow Habitat Regulations Assessment. The proposal makes explicit provision of an onsite SANG as part of comprehensive landscape strategy to mitigate the potential for additional recreational pressure on the Clanger Wood SSSI.
Landscape and Visual Impact assessment required pursuant to WCS Policy CP51. Acknowledgement that landscape and visual impacts are likely to be acceptable with mitigation.	The proposal follows a landscape-led design approach. This is explained in the Landscape Design Statement. Refer to ES Chapter 10 (Landscape and Visual Amenity)
Flood risk mitigation and drainage advice and compliance requirement.	The proposed built development, road and buildings, lies wholly within Flood Zone 1. The drainage strategy has

	been informed by ground water monitoring and percolation testing. The drainage and flood mitigation strategy is set out in ES Chapter 12 (Water Quality, Hydrology and Flood Risk) and the standalone FRA and Drainage Strategy.
Section 106 – advice on contributions and Affordable Housing provision (mix and tenure)	Pre-application advice on affordable housing tenure mix and housing typologies has directly informed the overall housing mix. The Education Report confirms that no education contributions are required. Refer to the draft Heads of Terms in Section 5.0 of this Statement.
Community consultation advice	The Statement of Community Involvement explains the community engagement that has been undertaken and how this has informed the proposals.

Table 5: Summary of pre-application matters and applicant comments

(v) Pre-application Enquiry with Natural England: Submitted November 2025

- 2.40 A pre-application enquiry has been submitted to Natural England under their Discretionary Advisory Service (DAS) with the objective of agreeing the buffers and scope of mitigation that may be required to mitigate recreational pressure on the Clanger Wood SSSI habitat used by bats associated with the Bath and Bradford on Avon Special Area of Conservation (SAC).
- 2.41 A meeting was held between Ethos Environmental Planning and Natural England on Monday 9th February to discuss the pre-app. Natural England advised that they have been in dialogue with the promoters of the Storridge Road site, and requested the preparation of a comprehensive masterplan showing Glenmore Farm, Storridge Road and Hawke Ridge Business Park site to demonstrate how the respective onsite SANG / POS / PROW enhancements could work in combination to reduce the potential for recreational pressure on the Clanger Wood SSSI.
- 2.42 Natural England also confirmed that the advance planting that was undertaken by the landowner pursuant to the employment outline permission could be included as part of the mitigation for the current proposal. The proposed buffer widths around the Site perimeter were also agreed as part of the DAS process.

(vi) Site Marketing

- 2.43 The history of comprehensive, continuous and proactive marketing of the site, in excess of 12 years, has been fully documented by the incumbent marketing agents, Carter Jonas. A peer review of the marketing process has been undertaken by Knight Frank as set out in their Market Advice Report. The landowner has advised that the withdrawn Amazon application, as documented in the planning history section above, has had a significant blighting effect in discussions between the landowner and prospective occupiers of the allocated employment site. Further commentary on the viability of the employment allocation is set out in Section 5.0 of this Statement.

3.0 Description of the Proposals

- 3.1 This Section outlines a summary of the finalised proposal that is submitted as a full planning application. As noted in the Introduction, the proposals have been informed by: pre-application consultation with both Wiltshire Council and Natural England; baseline surveys across the full range of applicable disciplines to establish and understand the site constraints; a full review of applicable planning policy requirements; local community consultation; and market testing. A full description of the proposals is set out in Design and Access Statement, Landscape Design Statement, and Transport Assessment.

(i) Description

- 3.2 Full planning permission is sought for:

Erection of: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works.

(ii) Summary of scheme components and POS metrics

- 3.3 The proposal comprises the following key elements:
- A commercial frontage scheme located on the north parcel comprising: a retail convenience store; 3 No. flexible retail / leisure units (Class E); a drive-through retail unit (Class E); and a 64-bed nursing home.
 - A singular point of vehicular access utilising the existing four-arm roundabout to Hawke Ridge Business Park including the access spur tails to the respective north and south parcels.
 - Car and cycle parking provision in accordance with the Council's standards.
 - Two-storey new housing development (249 No. residential units) distributed on the balance of the north parcel and south parcels.
 - All housing designed to meet Future Homes Standards.
 - Two No. Suitable Alternative Natural Greenspace (SANGs) located on the north and south parcels.
 - Perimeter green and blue dark corridors and public open space linking to the SANGs.
 - Allotments and equipped play areas
 - Off-site highway works and enhancements to the existing bus stop as part of active travel strategy providing connectivity to Westbury and beyond.
 - Off-site public rights of way enhancement to the existing public footpath network.
- 3.4 The key metrics relating to the provision of public open space, including SANG provision, are as follows:
- Formal POS area: 2,302 sqm
 - Incidental POS area: 57,077 sqm
 - Total SANG Area (NB. within the incidental POS)
 - Total Public Open Space: 59,379 sqm

(iii) Site Wide Masterplan

- 3.5 The mixed-use layout has been informed by best practice place-making principles and is explicitly landscape and ecology-led. The layout has also had regard to the Council's Urban Design SPD (2023) and other applicable national design guidance.



Figure.8 Extract from the Site Wide Illustrative Masterplan

(iv) Landscape and Ecological Strategy

- 3.6 Seasonal ecological surveys, policy analysis and pre-application discussion with Natural England and the Council, has established a clear understanding of the ecological baseline condition of the Application Site.
- 3.7 This, together with the Lighting Assessment, Arboricultural Assessment; Drainage Strategy and Landscape and Visual Impact Assessment (LVIA) has informed a landscape-led design approach to the masterplan.



Key  Site boundary  Existing trees and vegetation - RPA shown in magenta, refer to Arb survey for further info Soft works  Proposed strategic tree  Proposed street tree  Proposed hedgerow - ornamental  Proposed hedgerow - native  Proposed native woodland planting  Proposed ornamental planting - car park screening and groundcover  Proposed riparian focal mix - in infrastructure areas  Proposed ornamental planting - on plot curtilage, sunny aspect  Proposed ornamental planting - on plot screening, sunny aspect  Proposed ornamental planting - on plot curtilage, shady aspect  Proposed ornamental planting - on plot screening, shady aspect  Proposed native marginal planting mix  Proposed bulb planting  Proposed amenity grassland  Proposed native meadow grassland  Proposed wetland grass mix  Proposed mown path Hard works Refer to TUMU/Pegasus drawings for all residential hard surface proposals  Proposed reinforced grass  Proposed tarmac  Proposed blockpaving - bracken  Proposed bonded rubber play bark - natural colour mix  Proposed self binding gravel  Proposed 1.8 m high metal palisade fence and matching gate  Proposed 1.2 m high timber post and rail fence and matching gate  Proposed seat - Funitubes Cheshunt  Proposed picnic bench - Braxap Land Picnic Bench  Proposed bin - Braxap Winchester Canopied Litter Bin  Proposed stone glacial boulders  Proposed hard wood sleepers and tree trunks			
Notes: This drawing is for planning purposes only, do not construct from this drawing. Any species substitution must be verified with Greenhugh Landscape Architect Excavations: Contractors must ensure they have full information relating to services and drainage positions before undertaking any excavations. Root barriers to be used in association with tree planting adjacent to kerbs, services and hard surfaces etc.			

Figure 9. Extract from Proposed Site-Wide Landscape Plan and Key

- 3.8 The proposals provide integrated green and blue infrastructure including the provision of: onsite areas of public open space; two Suitable Alternative Natural Greenspace (SANG) areas and a circular link; and dark permitter buffers that are integrated with the surface water drainage strategy.
- 3.9 The proposed landscape off site works relate to enhancements to the existing PROW network as part of an integrated strategy, combined with the onsite SANG provision, as part of a mitigation strategy to minimise the potential for additional recreational pressure on the Clanger Wood SSSI.

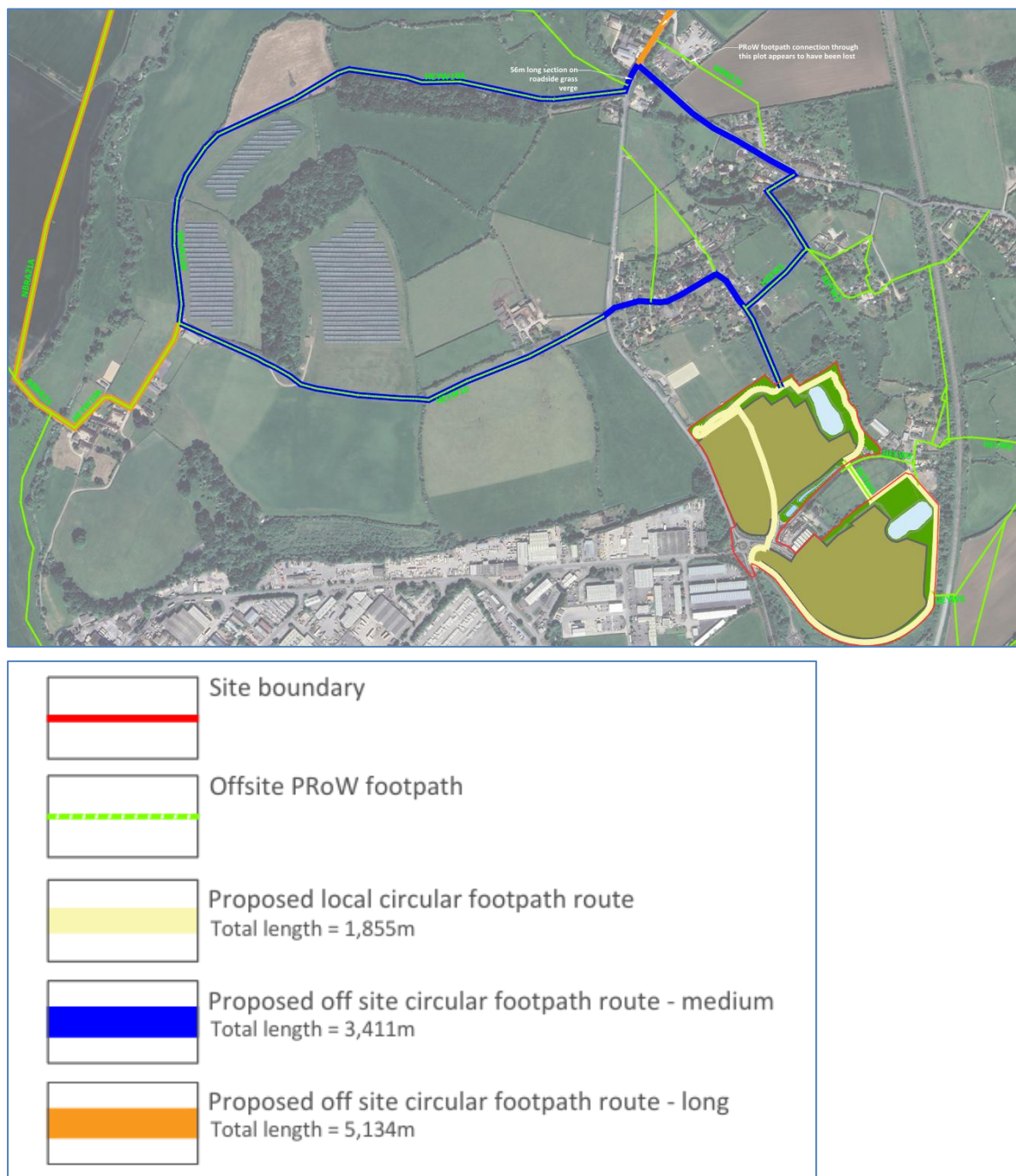


Figure 10. Extract from Proposed Circular Footpath Routes Plan

(v) Access and Parking

- 3.10 Vehicular access will be provided from the existing four arm roundabout that serves Hawke Ridge Business Park. Additional off-site works relating to a new pedestrian crossing point to the south of the roundabout and associated geometrical changes to enhance cycle and pedestrian connectivity is proposed and will be secured via a s.278 agreement.



Figure 11. Extract from Proposed Off-site Access Plan

- 3.11 The internal layout has been tracked-tested for refuse, service and delivery vehicles.
- 3.12 Car parking will be provided in accordance with the Council's maximum parking standards in a combination of dedicated commercial car parking for the proposed retail and nursing home elements along with visitor and staff cycle storage as follows:

- Care Home: 27 No. car parking spaces and 10 No. cycle parking spaces
- Retail and Drive Thru': 44 No. carparking spaces and 12 No. cycle parking spaces.

- 3.13 Residential car parking will be provided in accordance with the Council's maximum standards: 571 No. spaces (allocated) and 53 No. visitor on street spaces. Cycle parking will be provided at 2 No. secure spaces per plot either in a garage or a shed within the rear garden.
- 3.14 EV charging infrastructure will be provided in accordance with Part S of the Building Regulations.

(vi) Site Wide Drainage Strategy

- 3.15 The Drainage Strategy has been informed by a site investigation, ground water monitoring, analysis of national SuDs requirements, and an iterative design development process as part of the landscape-led design process.
- 3.16 Surface water will be conveyed around the site in swales, attenuated in detention basins and positively discharged into Bitham Brook at less than the green field run off rate with the required climate change factor.
- 3.17 Foul drainage will connect into the existing mains system that was installed as advance infrastructure to support the marketing of the allocated and permitted employment site.

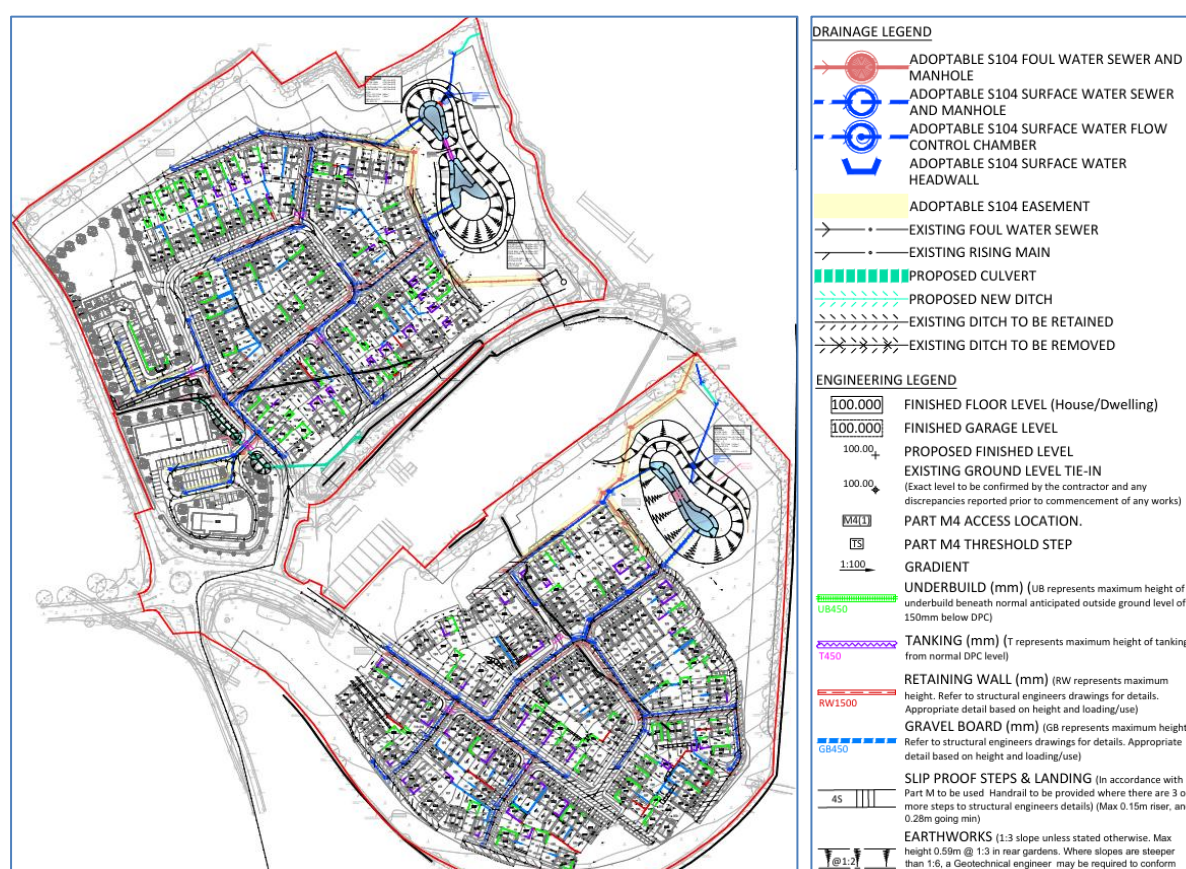


Figure 12. Extract from Proposed Drainage Strategy Plan with Key

(vii) Commercial Proposals

- 3.18 The non-residential scheme will provide retail services and amenities to future residents and the existing and emerging residential and business communities.
- 3.19 The nursing home layout has been designed to comply with Care Quality Commission (CQC) standards providing secure accommodation for frail elderly and dementia patients, and also those households in need of respite temporary care provision for relatives.



Figure 13 Extract from the Frontage Commercial Proposed Site Layout Plan

3.20 The proposed retail units are designed in contemporary style for maximum flexibility of layout for end-user fit out. The proposed care home follows a more conventional approach to the superstructure with pitched roof and a pallet of materials and detailing that responds to the local vernacular character of the wider area, as explained in the DAS.

3.21 The proposed external materials are summarised below:

Care Home:

- Walls: Buff brick with projecting brick detailing; and fibre cement weatherboard cladding
- Roof: slate grey fibre cement tiles
- Window and doors: powder coated aluminium (RAL: 7016)
- Black uPVC Rainwater Goods
- Grey Metal Railings (RAL: 7016)

Retail Units:

- Buff brick with projecting brick detailing
- Kingspan AWP wall cladding panels – RAL 7016
- Kingspan RW trapezoidal roofing panels
- Aluminium Grey window and door frames - RAL 7016
- aluminium rainwater goods - RAL 7016

Drive Thru:

- Kingspan AWP wall cladding panels – RAL 7016
- Timber cladding
- Kingspan single ply roofing panels
- Aluminium Grey window and door frames - RAL 7016
- Aluminium rainwater goods - RAL 7016

(vii) The Housing Proposals

3.22 The housing layout has been informed by best practice place-making principles, as explained in the DAS.

3.23 Full Information on the housing mix is set out in a separately submitted Accommodation Schedule and is summarised in the table below:

Tenure	1 Bed	2 Bed	3-bed	4-bed +	Total
Open Market	-	21	84	44	149
Affordable Rent	14	23	17	6	60
Shared Ownership	-	9	6	-	15
First Homes	6	14	5	-	25
Total	20	67	112	50	249

Table 6. Housing Mix Summary

3.24 The proposed housing external materials are as follows:

- Walls brick: red multi; red; and buff
- Walls reconstituted stone
- Walls render: white through colour

- Roofs: concrete plain tiles; slate grey; double roman red & brown
- Windows and doors: uPVC
- Rainwater goods: black uPVC

3.25 The external materials will be distributed in three distinct character areas, as illustrated in the extract below:

RESIDENTIAL CHARACTER AREA	FACING MATERIAL		ROOF MATERIAL		DOOR / CANOPY DETAILING	WINDOW DETAILING
	PRIMARY	SECONDARY	PRIMARY	SECONDARY		
SPINE ROAD RESI	 BUFF BRICK	 OFF-WHITE RENDER	 SLATE EFFECT CONCRETE TILES		 ANTHRACITE GREY DOOR WITH MATCHING FLAT ROOF CANOPY	 ANTHRACITE UPVC WINDOWS
RURAL EDGE	 RED MULTI BRICK	 RECON STONE	 RED DOUBLE ROMAN TILES	 SLATE EFFECT CONCRETE TILES	 ANTHRACITE GREY DOOR WITH LEAVED FRONTED CANOPY (TILE COLOUR TO MATCH ROOF)	 WHITE UPVC WINDOWS
URBAN CORE	 RED BRICK	 OFF-WHITE RENDER	 BROWN DOUBLE ROMAN TILES	 SLATE EFFECT CONCRETE TILES	 SAGE GREEN DOOR WITH LEAVED FRONTED CANOPY (TILE COLOUR TO MATCH ROOF)	 WHITE UPVC WINDOWS

Figure 16. Exact from DAS showing the distribution of external materials

(vii) Sustainability Strategy

- 3.26 The mixed-use scheme has been designed with a commitment to a fabric first approach that utilises sustainable construction methods to reduce energy consumption and operational carbon emissions. This will be achieved through maximising the use of sustainable materials and cutting embodied emissions, minimising waste and increasing recycling, conserving water resources, incorporating green and blue infrastructure and sustainable drainage, factoring in climate change and sustainable travel opportunities.
- 3.27 The residential scheme has been designed to comply with the government Future Homes Standards. Each house will incorporate passive solar design principles and Air Source Heat Pumps as a low carbon source of space heating and hot water. Refer to the enclosed Energy Statement which sets out more information.

(viii) Waste Minimisation Strategy

- 3.28 The enclosed Waste Minimisation Statement sets out the proposed waste minimisation strategy for the site during the construction phase.

(ix) Implementation

- 3.29 The implementation of the mixed-use proposals, as a single phase of development, is based on the following indicative programme:
- Full planning permission granted: January 2028
 - Commencement of works on site: April 2028
 - First occupation / legal residential completion: April 2029
 - 60 residential units per annum to be delivered from April 2029.
 - Anticipated earliest completion of the care home and retail/commercial and drive thru will be from April 2029

4.0 Planning Policy Context

(i) Statutory Development Plan

- 4.1 The statutory development plan comprises: (i) Wiltshire Core Strategy (adopted 2015); (ii) saved policies of the West Wiltshire District Plan 2011 (saved in 2015); and (iii) Wiltshire Housing Sites Allocation Plan (adopted in 2020).

(ii) Applicable Designations

- 4.2 Hawke Ridge Business Park is located in the A350 corridor between Westbury and Trowbridge, adjacent to the West Wiltshire Trading Estate, and is allocated as a strategic employment site under WCS Policy CP2. The allocation relates to 14.7ha of land for a mix of B class uses.

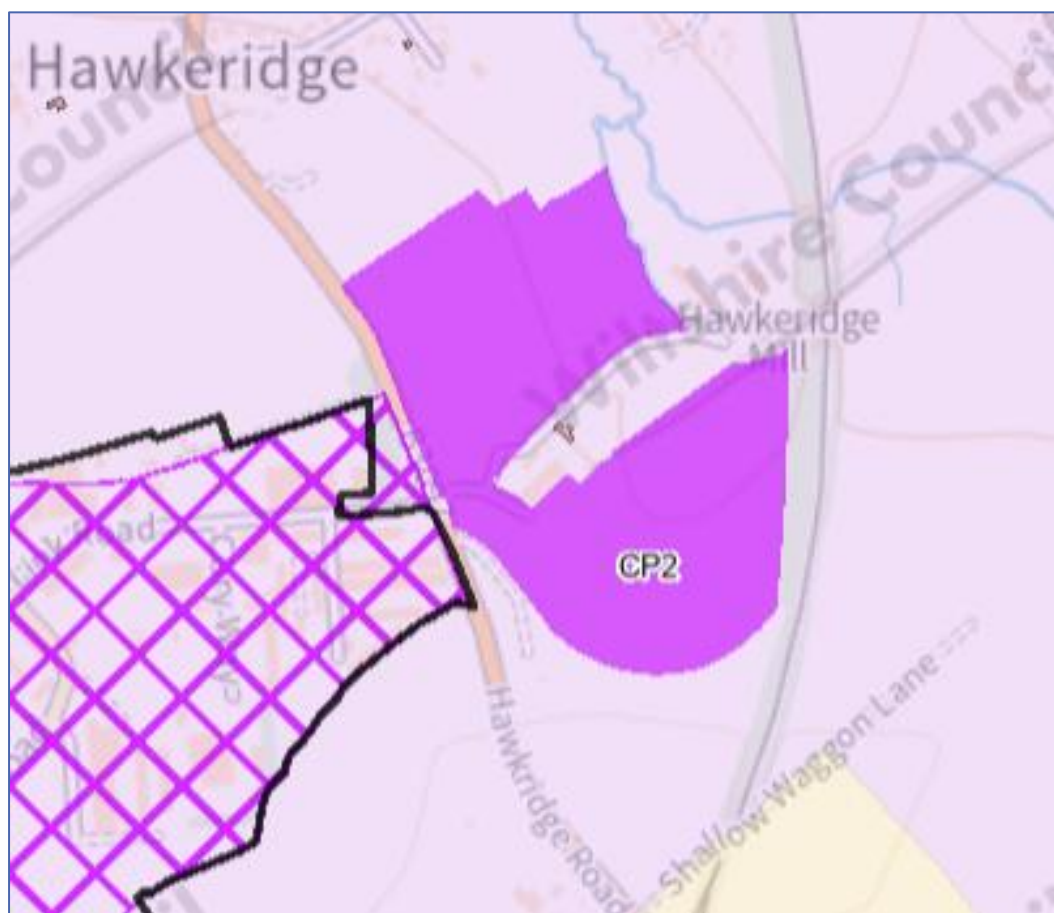


Figure 14: Extract of Wiltshire Interactive Policy Map showing the site (purple shading) as an Employment strategic site (WCS Policy CP32: Westbury Community Area) and within the wider 40% affordable housing zone (coloured purple under Policy CP43).

- 4.3 The majority of both parcels of land fall within Flood Zone 1 with only the areas immediately adjacent to the Bitham Brook in Flood Zones 2 and 3. Areas of the site are however subject to medium - high surface water flood risk, particularly around Bitham Brook and its surroundings to the east.

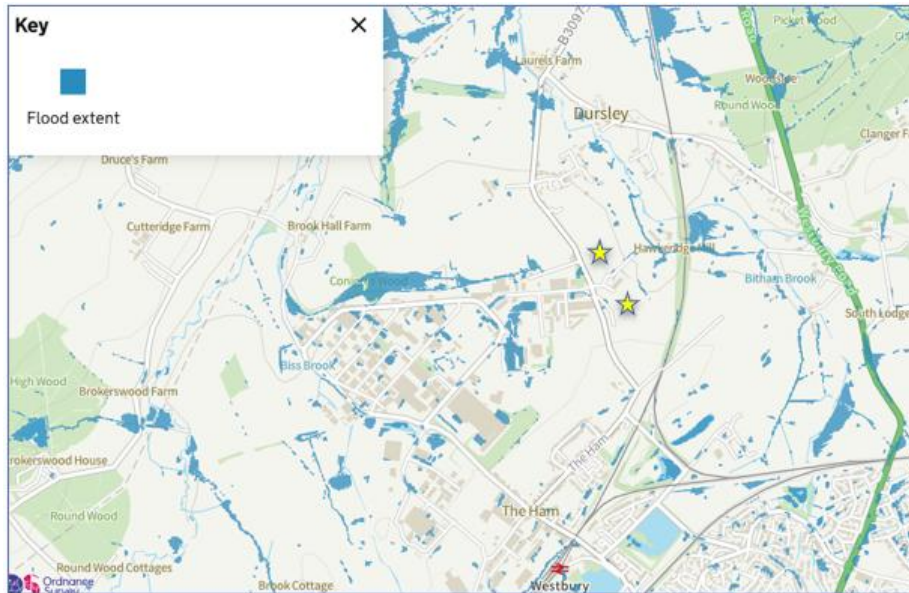


Figure 15: Extract of Environment Agency Flood Maps for Planning locating Parcels A and B (denoted by yellow stars) in Flood Zone 1 but noting local areas around the site with medium – high risk of surface water flood risk.

- 4.4 The site is located within the Bath and Bradford on Avon Bats Special Area of Conservation ('SAC') consultation zone
- 4.5 The Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) SPD is applicable to the site. Relevant extracts from the mapping within the SPD are set out below. A small portion of the eastern part of the site is located in the 'red' consultation zone due to the proximity of the site to Clanger Wood SSSI to the east. No built development is proposed in this area.

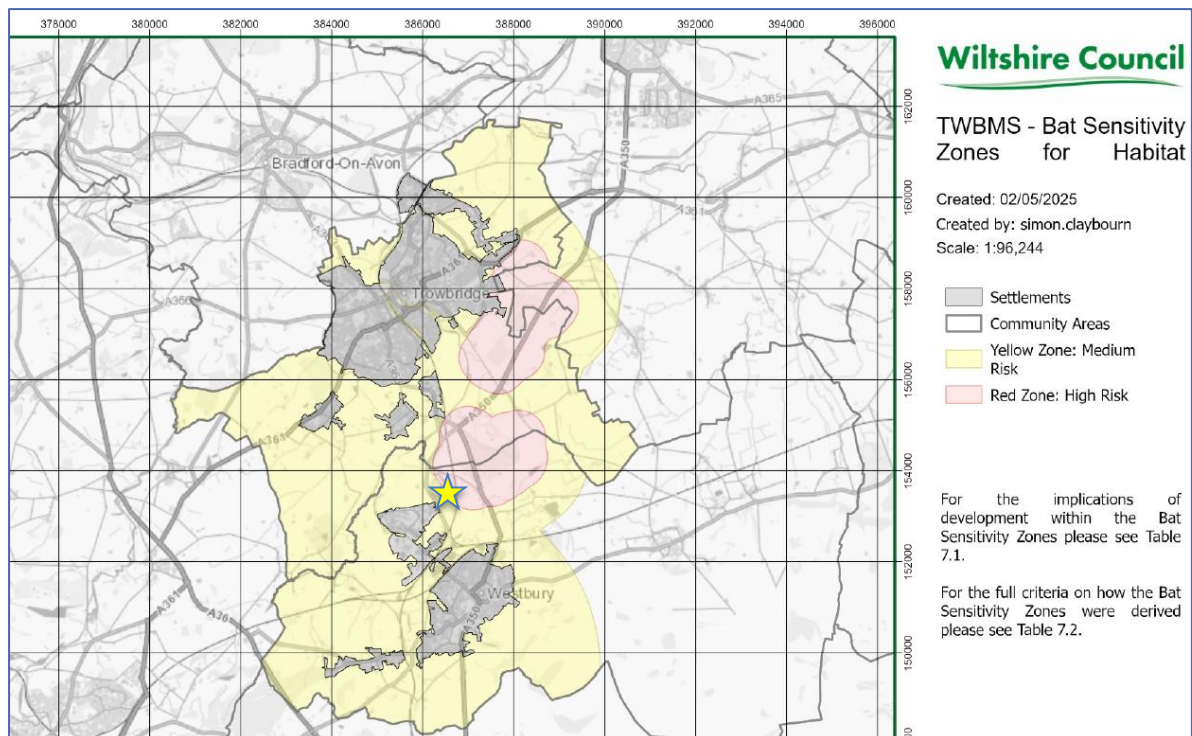


Figure 16. Extract from the Bat Sensitivity Zone for Habitat from the TWBMS SPD (2025)

- 4.6 The grade II listed Hawkeridge Farmhouse and its associated ancillary outbuildings, Hawkeridge Barn, is located on Mill Lane between both land parcels.

(iii) Wiltshire Core Strategy (2015)

- 4.7 Applicable Core Strategy policies include:

- CP1: Settlement Strategy
- CP2: Delivery Strategy
- CP3: Infrastructure Requirements
- CP32: Spatial Strategy Westbury Community Area Strategy
- CP38: Retail and Leisure
- CP41: Sustainable Construction & Low Carbon Energy
- CP43: Providing Affordable Homes
- CP45: Meeting Wiltshire's Housing Needs
- CP46: Meeting the Needs of Wiltshire's Vulnerable and Older People
- CP50: Biodiversity and Geodiversity
- CP51: Landscape:
- CP52: Green Infrastructure
- CP55: Air Quality
- CP57: Ensuring High Quality Design and Place-shaping
- CP58: Ensuring Conservation of the Historic Environment
- CP60: Sustainable Transport
- CP61: Transport and Development
- CP62: Development Impacts on Transport Network
- CP64: Demand Management
- CP67: Flood Risk
- CP69: Water Resources

(iv) Regulation 19 Wiltshire Local Plan (2024)

- 4.8 A Regulation 19 iteration of the Wiltshire Local Plan Review (ELP) was submitted to the Secretary of State for Housing Communities and Local Government for examination on 28th November 2024. Following fundamental concerns raised by planning inspectors in respect of the spatial strategy, plan period and insufficient consideration of reasonable alternatives, the Council issued a Notice of Withdrawal of ELP pursuant to Section 22 of the Planning and Compulsory Purchase Act 2024 on 22nd May 2026. Accordingly, no weight can be ascribed to the development management policies and allocations contained within the now withdrawn ELP.
- 4.9 Wiltshire Council's Cabinet meeting of 25th June 2026 approved the commencement of the Wiltshire Local Plan in accordance with regulations introduced under the Levelling-up and Regeneration Act 2023 which came into force on 25th March 2026.
- 4.10 A Commencement Notice was published on 30th June 2026, which formally confirmed the comment of the new 'Wiltshire Local Plan'. The new local plan regulations mandate a faster 30-month digital-first plan-making system. A timetable has also been published, which advises the commencement of 'scoping consultation' in September 2026 followed by the various milestone stages of the plan making process culminating in anticipated adoption in April 2029.

(v) Wiltshire Employment Land Review Update (2023)

4.11 The ELR (2023) was prepared as part of the evidence base to support the now withdrawn Regulation 19 Wiltshire Local Plan (2024). The ELR, in Figure 4.17 identifies that there is 2.1ha of demand for industrial land at Westbury – i.e. less than Devizes, Malmesbury, Wootton, Corsham, Calne etc. The report goes on to identify 2ha of vacant space at the WWTE as shown in Figure 6.12.

4.12 Paragraph 6.3.10 the report states:

"At Bradford on Avon, Trowbridge, and Westbury there is indicative demand for up to 5.2 ha for Offices and 5.6 ha for Industrial. There are seven sites in this area, comprising 44.1 ha of land. All these sites are existing or allocated and at low or medium risk of non-delivery. There is significantly more supply than demand in this area. Some of the demand arising from the rest of the FEMA, outside the settlements, could also be met on these sites."

4.13 Paragraph 6.3.15 states:

"In the rest of A350 FEMA, comprising the rural area, there is cumulative demand for up to 20 ha of employment land. Whilst this demand will be spread across the rural part of the FEMA and largely met on many small sites, some of this demand could potentially be met at two sites at Mere and Pewsey – with around 2 ha of land available. The sites associated with the settlements that are discussed above, if delivered, could help to meet this demand. There is potential excess supply of 36 ha at Trowbridge and Westbury; 4 ha at Devizes; and 4 ha at Warminster if all potential sites are delivered."

4.14 The key points raised at Examination Hearing session, which took place on 13th November 2025, included the following matters raised in respect of the ELR:

- ELR has too much focus on local demand and insufficient evidence in respect of demand for strategic logistics provision; and
- ELR evidence is over reliant on forecasting models, based on older data sets, and does not sufficiently reflect more recent market signals.

4.15 The Joint Planning Inspector's letter following the examination hearing (Ref: I.D 12 dated 22nd December 2025) set out comments under the heading 'Employment Need and Delivering the Employment Requirement' (Paragraphs 19-21). The letter opined that:

"...further work will be needed to recalculate the employment land requirement".

4.15 The Inspectors also set out comments under the heading 'Planning for Strategic Logistics Development' (Paragraphs 22 and 23). The letter opined that

"...there are further deficiencies of the Plan and Policy 64 in terms of the approach to strategic logistics development adjacent to the M4 Junction 17. In that respect, we acknowledge that the evidence basis for identifying a specific quantum of logistics development in the plan to address regional and local needs is not currently available".

...

“...it follows that main modifications will be required to refine the criteria-based approach set out in Policy 64 for national and regional logistics development adjacent to M4 Junction 17. For effectiveness, we recommend that this would be most appropriately achieved through a new policy focussed specifically on strategic logistics development.”

- 4.16 Noting the issues raised at the 2025 Examination, and the subsequent comments made by the joint inspectors in their letter dated 22nd December 2025 (Reference ID.12), it is clear that no weight can be given to the ELR (2023) nor the proposal to retain the employment allocation of the site, in the determination of this planning application. This is on the basis that the ELR is outdated and a new employment land supply and logistics evidence base will need to be formulated to support the new Wiltshire Local Plan plan-making process targeting assessment of land for logistics around Junction 17 of the M4, in particular. This view is also supported by the advice set out in the Knight Frank Report that is included in this submission.

(vi) Emerging Heywood Neighbourhood Plan

- 4.17 The site lies within Heywood Parish, which has been designated as a Neighbourhood Plan Area. At the time of writing, no programme of next steps in relation to the draft Heywood & Hawkeridge Neighbourhood Plan 2020-2036 has been published. Enquiries have been submitted to Wiltshire Council’s Neighbourhood Plan Manager to ascertain whether any further plan making work is in prospect but no response has been received.

(vii) NPPF and NPPG

- 4.18 National planning policy and guidance is set out in the February 2025 iteration of the NPPF and web-based guidance in the NPPG (from 2014).
- 4.19 A summary of the applicable NPPF policies is set out below:
- Achieving sustainable development: 7-10
 - The presumption in favour of sustainable development: 11-14
 - Decision making: 38, 48-51
 - Delivering a sufficient supply of homes: 61
 - Ensuring the vitality of town centres: 91,94
 - Promoting healthy and safe communities: 96
 - Promoting sustainable transport: 109, 115, 116, 117
 - Making effective use of land: 124, 125, 129
 - Achieving well-designed places: 131, 135
 - Meeting the challenge of climate change, flooding and coastal change: 161, 164, 166, 170, 173, 181
 - Conserving and enhancing the natural environment: 187, 193
 - Conserving and enhancing the historic environment:
 - Annex 1: Implementation: 231-233
- 4.20 Of particular relevance to this proposal are: Paragraph 11d ii (i.e. the engagement of the Framework’s ‘tilted balance’); and Paragraph 38:

38. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

(viii) NPPF Consultation Draft

4.21 A consultation draft NPPF was published between 17th December 2025 and 10th March 2026. A new NPPF is expected to be published by Q2/Q3 2026⁴. Although the document is currently only a consultation draft and therefore carries very limited weight, if implemented in its current form, the presumption in favour of sustainable development would be strengthened.

4.22 Policy S5 of the consultation draft states:

1. Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework:

4. Any other development proposals which do not fall within one of the categories set out above should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.

4.23 The following criteria are potentially applicable to the application proposal:

h. Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services; physically well-related to a railway station or a settlement within which the station is located; is of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and where the development would not prejudice any proposals for long-term comprehensive development in the same location;

j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test), and where the development would:

i. be well related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or ...”

(ix) Nationally Described Space Standards (DCLG: March 2015)

4.23 These space standards represent a technical planning standard which is a material consideration in the assessment planning applications. In Wiltshire, NDSS standards are only applicable to affordable housing provision.

⁴ In the event that the planning application is undetermined following the publication of the new NPPF, a revised Planning Statement will be issued to re-assess the application proposals against the newly published NPPF.

(x) Wiltshire Design Guide SPD (2023)

- 4.24 This Supplementary Planning Document expands upon Core Policy 57 Ensuring high quality design and place shaping in the adopted Core Strategy. The content has been structured around the 10 characteristics of design⁵ as recognised in the National Design Guide and responds to local priorities and expectations whilst maintaining regard to each of the 10 characteristics, as required by the NPPF (Paras 133 - 135) and corresponding Planning Practice Guidance on Design. The guide is intended to ensure that new developments are well grounded in their locality and create a positive sense of place.

(xi) Supplementary Planning Documents and Guidance

- 4.25 In addition to the Wiltshire Council Design Guide, the following published guidance has been identified by the Council in pre-application advice and has informed the development proposals.

- Air Quality SPD 2025
- Trowbridge and Westbury Bat Mitigation Strategy SPD 2025
- Waste Storage and Collection: Guidance for developers SPG (January 2017)
- Wiltshire Local Transport Plan 2011-2026 (adopted 2015) including the Car Parking Strategy and Cycling Strategy (adopted 2015)
- Wiltshire Council's Waste Core Strategy (adopted July 2009)
- A Green and Blue Infrastructure for Wiltshire: Wiltshire's Natural Environment Plan 2022-2030
- Wiltshire Local Cycling and Walking Infrastructure Plan (LCWIP)
- Active travel infrastructure design standard 2022
- Active travel parking standards and design guide 2022
- LTN1/20: Cycle Infrastructure Design (July 2020)
- Open Space provision in New Housing Developments: A Guide (SPG)
- Wiltshire Council's Playing Pitch Strategy (February 2017)
- Wiltshire Green and Blue Infrastructure Strategy (February 2022)⁵

(xii) Wiltshire Housing Land Supply

- 4.26 Following publication of the December 2024 iteration of the NPPF, Wiltshire Council's annual housing requirement has been significantly increased from 1,917 to 3,525 dwellings per annum. At the time of writing, Wiltshire Council has published an updated Housing Land Supply Statement in June 2026 with base date of April 2025. Table 2a stated that Wiltshire can demonstrate a supply of 10,268 homes over period 2025-2030, which translates into a claimed 5-year housing land supply of **2.8 years**. This constitutes a severe and persistent shortfall in housing land supply.

(xiii) Affordable Housing

- 4.27 Core Policy 43 (CP43) of the Wiltshire Core Strategy outlines the Council's approach to achieving their target of 13,000 affordable homes over the plan period. The Council has adopted a dual-zone approach with The Site falling within Heywood Parish which is subject

⁵ The GBI Strategy focuses on the natural environment and how by creating a strong, well considered network of green and blue corridors and spaces we can support adaption and resilience to climate change, halt loss of and improve biodiversity and contribute to the health and wellbeing of our communities.

to the 40% affordable housing provision zone. As at 31st March 2025 there were 3,999 households on the waiting list in the area administered by Wiltshire Council⁶.

⁶ *DCLG Housing Statistics, Live Table 600: Number of Households on local authority housing registers (waiting lists)*

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5.0 Planning Assessment

- 5.1 Section 38 (6) of the Town and Country Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine planning applications in accordance with the development plan unless material considerations indicated otherwise.
- 5.2 The enclosed planning application seeks permission for: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works.
- 5.3 The Planning Assessment section of this report sets out an assessment of: the principle of development; an overview of the technical Environmental Statement (ES) chapters; the various other non-ES technical reports; an affordable housing statement; and section 106 heads of terms. A planning balance assessment is set out in Section 6.0.

(i) Principle of Development

- 5.4 The assessment of the principle development for this mixed-use proposal requires consideration of the following matters: (i) the viability of The Site's employment allocation; (ii) the application of the retail sequential test and impact assessment; (iii) the application of the flood risk sequential test; and (iv) consideration of the suitability of the site to accommodate the mixed-use proposals noting the engagement of the NPPF's 'tilted balance' and the application of the NPPF's three-dimensional sustainability tests.

Viability of Employment Allocation

- 5.5 The applicant purchased The Site in 2007 as a prospective strategic employment site. At this time there was a prospect that the 'Glenmore Link', which was part of the Westbury Eastern by-pass proposal would be delivered. However, the Eastern by-pass was rejected following a public inquiry with the decision letter issued in 2009 citing severe environmental damage and weak traffic evidence.
- 5.6 Notwithstanding the rejection of the Eastern Westbury by-pass, The Site was subsequently promoted through the development plan making process. The planning merit of the proposed employment allocation was considered at an Examination in Public. The Site was subsequently allocated for employment use under WCS Policy CP2. In parallel with the development plan promotion, outline planning permission for B Class employment uses was secured in 2014, as documented in the planning history set out in Section 2.0 above.
- 5.7 A comprehensive and sustained marketing process commenced in 2012, which is documented in the Marketing Report. To further optimise the site marketing the landowner secured speculative employment reserved matters permissions for employment buildings and a full planning permission for roadside uses, as documented in the planning history set out in Section 2.0 above. Additionally, the landowner installed a new four arm roundabout, a foul drainage pumping station and rising main connection to the Westbury Sewage Works, and green infrastructure in the form of advance planting. The intent behind this significant speculative investment in site infrastructure was to attract interest from prospective large employment footprint logistics occupiers.

- 5.8 Over a sustained period of 12+ years of site marketing, the employment allocation was undermined by the approval of speculative employment development on agricultural land at the White Horse Business Park in Trowbridge, and other locations along the A350 corridor. It also became increasingly apparent during the marketing process that other more strategic locations in Wiltshire, notably the M4 and A303 corridors, were considered by the market to be more attractive locations for logistic occupiers.
- 5.9 The sustained site marketing process did however finally result in a subject to planning deal being agreed with Amazon, as is documented in the planning history summary in Section 2.0 above. In summary, a full planning application was submitted for a logistics hub on the northern land parcel in late 2021. Unfortunately, the Council did not prioritise or proactively manage the planning application. After a protracted planning process Amazon withdrew their application in March 2023 and unfortunately this inward investment opportunity was lost.
- 5.10 The withdrawal of the Amazon application in 2023 has a subsequent negative impact on the site marketing process. The blighting impact of the Amazon withdrawal combined with wider changes in the logistics market, led the landowner and their agent advisors to conclude that The Site is no longer viable as strategic employment site.
- 5.11 The Peer Review of Marketing and Market Update Report prepared by Knight Frank has confirmed the integrity of the robust and sustained 12 + year marketing process. However, on the basis of the site-specific marketing evidence, analysis of employment land supply and demand, and site-specific viability testing, Knight Frank has concluded the following:
- The Site is not a suitable location for inward investment in logistics
 - The Site does not lie within a catchment that includes the type of company that can afford new build accommodation on a serviced site at prevailing rates.
 - Competing non-allocated sites have been permitted, which in turn have undermined the site's allocation.
 - This leaves The Site only capable of attracting manufacturing occupiers or locally-based SMEs who have been unable to sustain the capital values and rents necessary to make new construction viable.
- 5.12 Furthermore, the Council's Employment Land Review (2023), which was cited in the Council's pre-application advice, is out of date and will need to be updated to support the new Wiltshire Local Plan.
- 5.13 It is therefore concluded that it is entirely legitimate in planning terms, and having regard to market signals, for the landowner to seek an alternative viable mixed-use development solution for The Site.

Retail Impact Assessment

- 5.14 The enclosed Retail Assessment is required because the proposed commercial / retail floorspace exceeds the 200 sqm GIA threshold that is set out in WCS Policy 38. In considering this element of the proposal it is material to note that planning permission was granted for similar scaled retail roadside scheme in 2017, as documented in the planning history in Section 2.0 above.
- 5.15 A proportionate Retail Assessment, pursuant to Paragraph 94 of the NPPF, has been undertaken to demonstrate that the proposed commercial development does not generate a significant adverse impact on Westbury town centre.

- 5.16 The conclusions of the Retail Assessment are summarised as follows: (i) the proposal presents no threat to the investment within Westbury town centre and the proposal would not deter investment within the centre; (ii) the impacts associated with the proposal are low, and represent no threat to the vitality and viability of Westbury town centre; (iii) the assessed impacts are not 'significantly adverse', and the proposal is in compliance with the retail guidance in the NPPF; and (iv) the proposal will deliver significant positive qualitative impacts that will benefit the local economy, environment and social inclusion. On this basis the proposal is compliant with WCS Policy 38 and the NPPF.

Flood Risk Sequential Test

- 5.17 The enclosed Flood Risk Sequential Test (FRST) was commissioned on a precautionary basis noting that all roads and residential development are wholly located within Flood Zone 1. It is only the surface water connections from the proposed built connections, which are water resilient elements of development, which cross Flood Zones 2 and 3 to connect into the Bitham Brook watercourse as part of the site wide surface water drainage strategy. Because these connections comprise 'development' the applicant team took an, on balance view, that Paragraph 175 of the NPPF is triggered.
- 5.18 The FRST has been undertaken on a Wiltshire-wide basis to assess whether there are any reasonably available alternative sites that could accommodate the proposed residential development at a lower risk of flooding, in accordance with the NPPF and the Flood Risk and Coastal Change Planning Practice Guidance (September 2025).
- 5.19 Following comprehensive review, the FRST concludes that no alternative site demonstrates a reasonable prospect of being delivered at a similar point in time to the application site, as required by national planning policy and guidance. On this basis, it was concluded that The Site represents the most sequentially preferable location for the proposed development within the defined search area. The Sequential Test is therefore passed.

Principle of Residential Development

- 5.20 Following changes introduced to the 'Standard Method' of calculating housing need in December 2024 iteration of the NPPF, there has been an increase of 84% of Wiltshire Council's Housing Need: rising from 1,917 to 3,525 homes per annum. The recalculation has led to a significant reduction in housing land supply. At the time of writing, Wiltshire Council claims to be able to demonstrate **2.8** years' supply in its administrative area⁷. This level of housing land constitutes a severe and persistent shortfall in housing land supply.
- 5.21 A consequence of the recent withdrawal of the Regulation 19 Wiltshire Local Plan, is that the inability to demonstrate a 5-year housing land supply will not now be addressed until such time as the new Wiltshire Local Plan is formally adopted, which currently anticipated by 30th April 2029⁸. In this context, it will be essential for the Council to permit sustainable residential proposals in order to maintain housing supply in the short to medium term and ensure the delivery of new homes to meet market demand and local affordable housing need.
- 5.22 The importance of providing a consistent supply of homes is strongly recognised in the NPPF and in recent appeal precedents. The provision of 249 No. homes including policy

⁷ As stated in the Housing Land Supply Statement: Base Date April 2025 (Published in June 2026)

⁸ As stated in the Wiltshire Local Plan Timetable dated 30th June 2026

compliant delivery of 40% affordable homes would make an important contribution to meeting local housing need in accordance with Section 5 of the NPPF.

- 5.23 The evidence presented in the ES, and standalone technical reports, confirms that none of the constraints in Footnote 7 of the NPPF are applicable. The NPPF's presumption in favour of 'sustainable development' is therefore engaged. The conflict with the Council's spatial development policies CP1 and CP2, is outweighed by the following:
- The severity of the housing land supply shortfall, i.e. 2.8 years.
 - Full compliance with applicable development plan (development management) policies, SPDs and legislation – refer to the ES and analysis below.
 - Contribution towards the delivery of the Westbury Community Area Strategy (WCS CP32)
 - Delivery of economic, social, environmental benefits, i.e. meeting the Framework's three-dimensional sustainable development test (as summarised below)
 - Immediately deliverable i.e. the proposal is submitted as full application, the site benefits from existing highway, drainage and green infrastructure, and the project programme indicates that the proposal could contribute a minimum of 120 homes, including 40% provision of affordable housing, towards the Council's 5-year trajectory.
- 5.24 The proposals, as demonstrated in the Environmental Statement and technical evidence base, are considered to meet the NPPF's three-dimensional tests for 'sustainable development' (NPPF: 7-10), as summarised below:

Test 1: Sustainable Location

- 5.25 The Site forms part of an emerging residential growth area to the northwest of Westbury, which has been established by approval of the Glenmore Farm residential scheme, as shown in Figure 3 in Section 2.0. The Glenmore Farm scheme provides an active travel link for cyclists and pedestrians to the roundabout that services Hawke Ridge Business Park. This together with the proposed off-site works will provide a viable active travel route to Westbury, as fully explained in the Transport Assessment⁹.
- 5.26 Existing public transport includes a regular bus service to Trowbridge and Westbury with existing bus stops located proximate to the HRBP roundabout within redline site boundary¹⁰. The bus stops will be upgraded as part of the proposed package of offsite highway works. The Site also The site lies 1.3km from Westbury mainline railway station, which provides direct connections to regional centres in the South West and London¹¹.
- 5.27 The proposal will provide enhancements and links to the existing PROW network for recreational access to the countryside along with the onsite provision public open space a large proportion of which will function as a Suitable Alternative Natural Greenspace (SANG).
- 5.28 The Site lies immediately adjacent to an established principal employment area, the West Wiltshire Trading Estate (WWTE), Northacre and Brook Lane employment areas, which support 4,890 existing jobs¹². The proximity of the WWTE to The Site has potential to provide employment opportunities for future residents that are within walking distance.

⁹ Refer to Transport Statement, Table 3: Accessible Amenities and Distance from Site

¹⁰ Refer to Transport Statement, Table 1: Typical Peak Period Bus Journey Times via Route D1

¹¹ Refer to Transport Statement, Table 2: Rail Commuting Times (July 2026)

¹² Source: Office for National Statistics via the Official Census and Labour Market Statistics (2024)

- 5.29 The proposed onsite convenience store, retail units and drive-through facility will provide local needs / top-up shopping for existing and proposed local residents and employees at the WWTE. These on-site facilities further strengthen the sustainability credentials of site by reducing the need to travel by private car.

Test 2: Socio-economic benefits

- 5.30 The mixed-use proposal will deliver a substantial range of socio-economic benefits. These have been quantified in the Economic Benefits Report and Socio Economics, Population and Human Health, ES Chapter 15. The headline statistics are graphically represented in the following infographic:

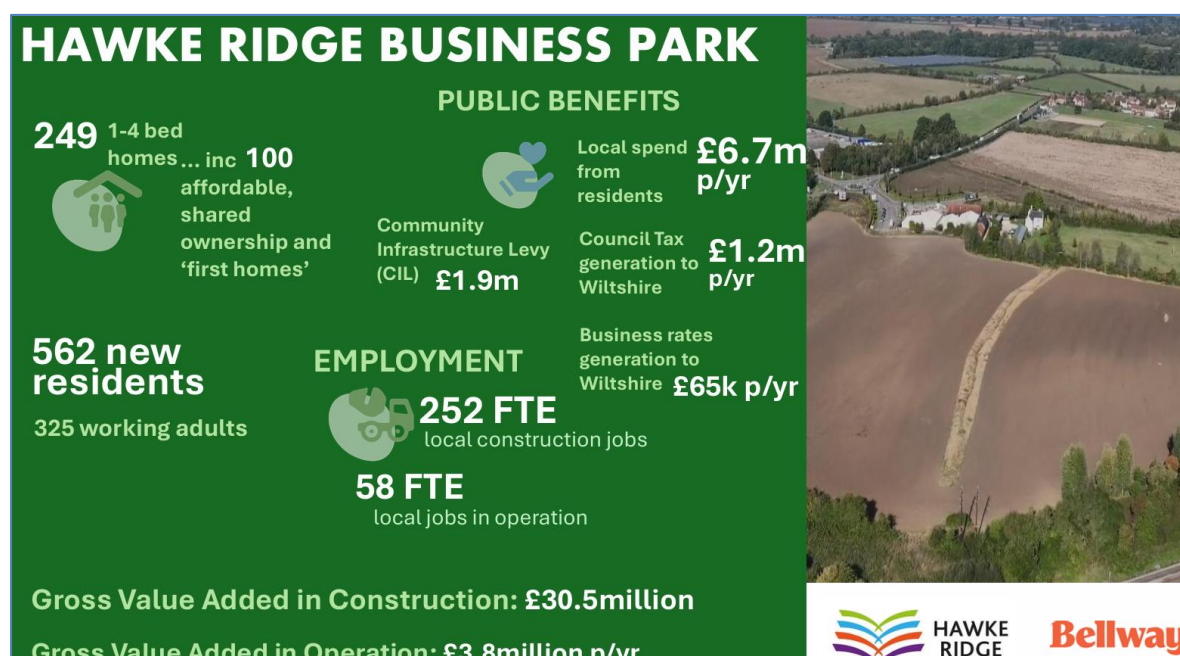


Figure 17. Extract from Infographic included within the Economic Benefits Report

- 5.31 The proposed commercial units will provide a beneficial amenity for employees at the West Wiltshire Trading Estate, which only has one café serving a large employment catchment, as well as for existing and future residents.
- 5.32 The proposed nursing home will meet a local care need for both dementia and domiciliary care and will also provide a facility for respite care. A recent report published by Savills¹³ notes that:
- "After two decades of static supply, the UK elderly care home sector is entering a demand-led growth phase, with a need for 139,000 additional beds over the next decade".*
- 5.33 Socio-economic benefits of housing are recognised by Inspectors in appeal decisions. Government have committed to the delivery of 1.5 million homes across this parliament as a key milestone in their mission to kick start economic growth, set out in its Plan for Change (Dec 2024). This commitment has been further reflected in £100 million grant in aid for Council planning departments to accelerate decision making and the planning reforms set out in the December 2024 NPPF. The clear political commitment to solving the housing crisis, and the role that councils have in addressing this through positive decision making,

¹³ UK Care Home Development Report, Savills (July 2026)

means that the economic benefits of new housing are now vitally important and should be viewed as a crucial component of the planning balance.

- 5.34 The government's mission led approach to increasing housing supply, as well as evidence from the Bank of England and, internationally, the European Commission and International Monetary Fund clearly demonstrate that there is a consistent and pressing requirement to build more homes to meet the significant level of unmet need in Britain, particularly for homes that are affordable. There is also a strong recognition of the need to provide more affordable homes in this mission led approach, which is reflected in both increased policy and funding support.
- 5.35 The housing crisis has arisen because new housebuilding has not kept pace with population growth and household formation rates and due to the shortage in housing stock which is now outstripped by demand, house prices in the UK have continually increased, both in real terms and relative to incomes making them unaffordable or unsuitable for today's needs. The level of affordable housing need in Wiltshire is substantial, as documented in the affordable housing statement below.
- 5.36 Furthermore, the combination of economic benefits including but not limited to those associated with local spending power of future residents, the construction phase, and payments such as S106 commuted sums and Council Tax, should also be acknowledged as forming part of the planning balance.

Test 3 - Environmental objectives

- 5.37 The Environmental Statement includes a wide scope of assessments across applicable disciplines and describes how all environmental impacts will be appropriately mitigated. These are discussed in more detail in subsection (ii) below. In summary, the proposal will deliver on site biodiversity net gain and will also offer flood risk betterment through the provision of integrated green and blue infrastructure as part of landscape and ecology-led design development process that is aligned with the Council's Green and Blue Infrastructure Strategy (February 2022).

Conclusion on the principle of development

- 5.38 For the reasons set out above, including the non-viability of allocated employment site, the engagement of the NPPF's 'titled balance', and demonstrable compliance with the NPPF's 3-dimensional tests for achieving sustainable development, the principle of development is established in spatial planning terms.

(ii) Environment Statement

- 5.39 **Transport and Access (Chapter 7):** The proposed mixed-use development would reduce general traffic relative to the employment uses permitted across the Application Site, delivering a higher level of incorporated mitigation via an active travel link, improved crossing over the B3097, reduced speed limit and enhanced bus stops, in addition to contributions to other off-site accessibility improvements.
- 5.40 The residual effect of the Proposed Development is therefore categorised as **moderate beneficial**, as it would bring effects resulting in material, noticeable improvements to highway conditions relative the employment development permitted on the Application Site.

- 5.41 **Air Quality (Chapter 8):** Dispersion modelling has been carried out to assess the impact of the operational development on local air quality. The results of the modelling indicate that concentrations of relevant pollutants (NO₂, PM₁₀ and PM_{2.5}) will meet the relevant AQS objective levels at nearby sensitive receptors and within the Application Site itself.
- 5.42 The significance of the effects of the emissions arising from the traffic associated with the operation of the Proposed Development is considered to be **negligible** in accordance with the EPUK & IAQM significance criteria. Mitigation measures have been proposed in line with Wiltshire Council's Air Quality Supplementary Planning Document.
- 5.43 **Noise and Vibration (Chapter 9):** The assessment has found that the noise effects at the closest residential properties during construction of the Proposed Development will be a Moderate adverse effect as a worst-case during phases of the construction programme that take place in close proximity to identified receptors. However, the effects will be temporary in nature and limited to receptors closest to the construction works. Typical effects during construction are identified to be not significant. The adoption of best practicable means mitigation measures as outlined in this chapter would control effects for typical working conditions but remain as a major adverse effect as a worst case.
- 5.44 Effects due to changes in road traffic at noise sensitive receptors along the road network serving the Proposed Development are identified to be **not significant**, with effects calculated to be minor even for the most affected road links.
- 5.45 Effects calculated at proposed residential dwellings are calculated to be **Negligible (not significant)** with the incorporation of suitable glazing and attenuated trickle ventilation. Therefore, based on the information and calculations as presented within the noise and vibration chapter, both existing and future residents of the Proposed Development at or around the Application Site will be protected from the dominant sources of noise, assuming appropriate mitigation measures are included within the development to achieve appropriate internal noise levels.
- 5.46 **Landscape Visual Amenity (Chapter 10):** In landscape character terms, the Proposed Development would result in the permanent change of the Application Site from agricultural land to a landscape-led residential development. Whilst this represents the introduction of built form into an area that is currently open and undeveloped, the Proposed Development has been carefully designed to retain important existing landscape features, including mature trees and boundary hedgerows, which will continue to provide a strong structural framework. The Site also has a planning fallback position for employment use and development as documented in Sections 2.0 and 4.0 above.
- 5.47 The proposed dwellings are substantially lower in scale and massing than the existing employment buildings within the West Wilts Trading Estate, which already form a dominant influence on the local landscape character. The development is also comparable in scale with the emerging pattern of residential development associated with approved and proposed schemes at nearby Glenmore Farm (Ref. PL/2021/03749) and Land off Storridge Road (Ref. PL/2026/03375). As the proposed planting matures, the Proposed Development will become progressively integrated within the surrounding landscape, softening views of the new housing and creating a more coherent and well-defined eastern edge to both the West Wiltshire Trading Estate and the expanding settlement of Westbury. Accordingly, the Proposed Development is considered to give rise to a **permanent beneficial effect of minor significance** on local landscape character.

- 5.48 Visibility of the Proposed Development is generally limited to receptors within the Application Site, around its periphery, and from a short section of the nearby PRow network crossing agricultural land to the south-east. During the early years following completion, upper storeys and rooflines would be visible from open viewpoints on the edge of Hawkeridge village. However, as the proposed structural planting establishes and matures, these views would become increasingly filtered, to the extent that in the long term the Proposed Development would be largely screened during the summer months when vegetation is in leaf.
- 5.49 From elevated viewpoints on the Salisbury Plain escarpment and in the vicinity of the Westbury White Horse within the Special Landscape Area, the Proposed Development would be perceived within the context of existing large-scale development, including the West Wiltshire Trading Estate and surrounding solar farms. Given the considerable viewing distance and the presence of these prominent neighbouring developments, the Proposed Development would not be readily distinguishable within the wider landscape.
- 5.50 Overall, the Proposed Development is considered to respond appropriately to its landscape context and would contribute to a more coherent and integrated eastern edge to the West Wiltshire Trading Estate and the settlement of Westbury. Although **some adverse visual effects** would occur for a limited number of receptors in close-range views, these would reduce as the proposed planting matures. In the longer term, the Proposed Development would be well integrated within the surrounding landscape framework and would **not give rise to significant adverse effects** on landscape character or visual amenity.
- 5.51 On this basis, the proposals are considered acceptable in landscape and visual terms and are in conformity with WCS Policies 51 and 52, and the NPPF.
- 5.52 **Ecology and Biodiversity: (Chapter 11):** A comprehensive programme of ecological survey has been undertaken at the Application Site, comprising a desk study, a UK Habitat Classification (UKHab) survey and a range of Phase 2 faunal surveys for bats, breeding birds, hazel dormouse, badger, reptiles, Great Crested Newt, otter and water vole.
- 5.53 One statutory designated site, Picket and Clanger Wood Site of Special Scientific Interest (SSSI), was identified within 2km of the Application Site. The Application Site also lies within the consultation zones of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) and the Salisbury Plain Special Protection Area (SPA), and within the Red and Yellow Zones of the Trowbridge and Westbury Bat Mitigation Supplementary Planning Document (SPD).
- 5.54 The Application Site itself is dominated by arable cropland of low ecological value, with the principal ecological interest concentrated on the boundary hedgerows, the tree-lined eastern railway and watercourse corridor, and the unlit western boundary. These features provide habitat of high importance for bats and connectivity to the wider landscape. Eleven bat species have been recorded, including the Annex II barbastelle, greater horseshoe and lesser horseshoe bats. Other notable species on site include breeding birds (including skylark), badger, reptiles and riparian mammals (otter and water vole).
- 5.55 A range of potential effects has been identified, principally relating to construction lighting and disturbance affecting commuting and foraging bats, breeding birds and other protected species, and to operational lighting, habitat change and recreational pressure affecting the bat SAC and the Salisbury Plain SPA. Prior to mitigation, these effects were considered to be potentially significant at the international level, subject to confirmation through Habitats Regulations Assessment (HRA) screening.

- 5.56 Mitigation measures are proposed to avoid, minimise or offset these effects, including a Construction Environmental Management Plan (CEMP) securing sensitive construction lighting, habitat buffers and precautionary species measures; a permanent lighting strategy designed to maintain retained bat habitat and dark commuting corridors in accordance with BCT/ILP GN08:2023 and the Bat Mitigation SPD; provision of a Suitable Alternative Natural Greenspace (SANG) and a Strategic Access Management and Monitoring (SAMM) contribution to address recreational pressure on the SPA; and a Landscape and Ecological Management Plan (LEMP) securing extensive habitat creation, enhancement and long-term management.
- 5.57 Following the implementation of these measures, no significant adverse effects are anticipated on any ecological receptor, and no adverse effect on the integrity of the internationally designated sites is anticipated, subject to confirmation through HRA screening. The retention of dark commuting corridors and the creation of extensive new habitat result in residual beneficial effects for bats, including a significant beneficial effect for common pipistrelle, and **minor beneficial effects** for a range of other species. The Proposed Development will deliver the statutory minimum 10% Biodiversity Net Gain.
- 5.58 It is therefore concluded that, subject to confirmation of outstanding survey results through the ecological addendum and of the HRA screening conclusions with the competent authority, ecology and nature conservation does not present a constraint to the granting of planning permission for the Proposed Development, and the scheme will deliver measurable net gains for biodiversity in accordance with WCS Policies 50 and 52, the NPPF, and the NERC Act 2006.
- 5.59 **Water Quality, Hydrology and Flood Risk (Chapter 12):** During the construction works there is the potential for a short-term change in the hydraulic regime; potentially leading to ponding of water on site, accidental runoff and increased runoff rates as the impermeable areas are increased. The most significant predicted environmental effects during construction (if left unmanaged) would include an increase of surface water runoff, thereby increasing fluvial flood risk, as well as sediment pollution and chemical pollution of the local watercourses. The main potential effects relate to changes to the current drainage regime, which may result in increases in the volume of surface water runoff. This may impact surface water flooding and fluvial flooding.
- 5.60 There is potential for the operational phase of the Proposed Development to impact upon the water quality of the adjoining water courses. As a result of the Proposed Development there is potential for an increase in hydrocarbons and other chemical loads; accidental spills and/or other wastes discharged to the watercourses.
- 5.61 All potential sources of flood risk at the Application Site have been assessed. The proposed buildings and access roads will be located in areas where the risk of flooding from all sources has been assessed as low.
- 5.62 During the construction phase, a range of mitigation measures have been recommended which should form part of a site-specific Construction and Environmental Management Plan (CEMP) within which all contractor activities will be undertaken. These measures include a temporary drainage network where necessary, to ensure adequate levels of pollution treatment prior to discharge from the Application Site.

- 5.63 The early phasing of the operational surface water quality elements in addition to temporary water quality treatment measures will minimise the risk of the pollutants entering the downstream watercourses.
- 5.64 A comprehensive SuDS system will be incorporated into the masterplan to provide a 'treatment train' approach that maintains a high standard of water quality prior to discharge to downstream watercourses. This will comprise source and site control features, including attenuation ponds and permeable pavements. Surface water runoff from potentially polluted areas will be discharged via source control measures, which effectively reduce total suspended solids, heavy metals and hydrocarbons in the runoff, thereby providing water quality treatment.
- 5.65 Surface water run-off during both the construction and operational phases will be attenuated using attenuation ponds. By limiting surface water discharge rates from the Proposed Development in accordance with local policy, the risk of increased flood risk on downstream watercourses will be minimised.
- 5.66 The construction and operation of the Proposed Development could have moderate to slight adverse impacts on downstream watercourses (in terms of surface water runoff and water quality) if suitable mitigation were not incorporated. However, with the mitigation measures outlined above, no significant environmental effects are anticipated as a result of surface water runoff.
- 5.67 Foul water from the Proposed Development will be discharged to the off-site sewer network where there is sufficient capacity to receive flows from the development. The connection point for discharging foul water from the Application Site to the existing drainage network was selected in consultation with Wessex Water. The magnitude of the effect on the off-site foul sewer network arising from the Proposed Development is small and will **not represent a significant environmental effect**. On this basis, the drainage strategy is considered to be compliant with WCS Policy 67 and the NPPF.
- 5.68 **Soils, Geology and Contaminated Land (Chapter 13):** Wilson Associates Geo-Environmental Ground Investigation has identified the Application Site to be uncontaminated with regards to human health and controlled waters / groundwater. Whilst laboratory analysis did record a single isolated low-level concentration of the leachable heavy metal contaminant Chromium within an area of localised near surface made ground (which is marginally above the Environment Agency EQS threshold for groundwater), risk assessment concluded that the risk to controlled surface waters / groundwater is **negligible**.
- 5.69 An assessment of the potential impacts during the construction phase has been carried out. This has shown that during this phase of the Proposed Development, land contamination is unlikely to worsen during site activities. Through good site practice and the implementation of suitable standard mitigation measures (such as Personal Protective Equipment (PPE) and implementing techniques as part of the CEMP), any potential temporary impact may be effectively mitigated and the resultant impacts are considered to be **negligible / neutral**.
- 5.70 An assessment of the potential impacts during the operational phase has been carried out. This has shown that during this phase of the Proposed Development, no specific control measures or mitigation measures are currently deemed necessary and the resultant impacts are considered to be negligible / neutral. The potential risk posed by potential migration of landfill-type ground gases to be refined and confirmed through additional ground gas monitoring prior to construction.

- 5.70 The residual impact of the Proposed Development on land contamination is considered to be **negligible / neutral** during both the construction and operational phases.
- 5.71 **Archaeology and Cultural Heritage (Chapter 14):** The only adverse effect identified with respect to built heritage relates to indirect effects upon the contribution made by setting to the significance of the Grade II-listed Hawkeridge Farmhouse through the loss of associated historic farmland and field boundaries. The majority of the building's heritage significance is vested in its architectural and historic special interests for which it is listed: these special interests will remain unaffected. Setting makes a modest contribution to the listed building's overall heritage significance. The key elements of setting – the immediate setting of Mill Lane, the garden to the south of the farmhouse and the long pasture field to its east – will all be preserved, whilst key views of its principal southwest and northeast facing elevations are now framed, as intended, by planting established over 10 years ago during partial implementation of the approved 2014 business park development.
- 5.72 The Proposed Development will therefore only affect the listed building's wider setting, which is already well screened by the landscape planting implemented for the aforementioned 2014 development. Mitigation measures include additional landscape planting to screen the low-rise retail development to the northwest of the farmhouse and the selection of suitable material and colour palettes for the most proximate elements of the Proposed Development with which there will be intervisibility (mostly housing to the north and south) - albeit that intervisibility will generally be filtered through the existing landscape planting to varying extents seasonally. After mitigation, there is considered to be a residual slight adverse significance of effect to the heritage significance of the listed building. Effects when considered alongside the identified cumulative developments within the environs of the Application Site would remain at the **slight adverse level**.
- 5.73 Potential **slight/moderate adverse** effects to the significance of buried archaeological remains have been identified, with a focus of activity of medieval to post-medieval date identified by previous archaeological investigations in the northeast of the Application Site. Structures and a driveway, with associated finds of 12th-14th-century and later pottery, have been identified in this area through historic map repression, geophysical survey and archaeological trial-trench evaluation. These remains are likely to be severely damaged or removed by construction groundworks and associated planting and landscaping. A programme of archaeological mitigation is proposed which would offset the loss of such remains by recording them and making the archive and knowledge thus gained available to the public and archaeological community, in line with the requirements of National Planning Policy. After implementation of the programme of archaeological mitigation the significance of effects upon archaeological remains would reduce to **neutral**. There are considered to be no potential cumulative effects upon buried archaeological remains.
- 5.74 **Social Economics, Population and Human Health (Chapter 15):** The socio-economic assessment has identified that 277 Full Time Equivalent (FTE) jobs would be generated in Wiltshire by the Proposed Development during the six-year construction phase; including jobs directly created by the Proposed Development at the Application Site and those created along the supply chain through the provision of goods and services to the construction process.
- 5.75 Once completed, the Proposed Development is predicted to generate approximately 97 FTE jobs on-site. Considering direct and indirect job creation for local residents within Wiltshire County, the Proposed Development is likely to generate approximately 64 FTE employment opportunities to the target area of Wiltshire County. This will be beneficial to local residents.

Future residents are also predicted to increase household spending in the local economy by £6.7 million.

- 5.76 The Proposed Development will provide 249 residential dwellings of a range of sizes from maisonettes to 4-bed houses including 40% affordable housing and a 64-bed care home, all of which will be beneficial to local residents.
- 5.77 During construction activity, there will negligible effects on human health from the particulate matter and dust generated, as well as noise. During Operation, additional vehicles on the road are not significant enough to generate more air and noise pollution and the effects are negligible.
- 5.78 The assessment has shown that the Proposed Development will have a negligible impact on hospitals and dentists and a minor adverse impact on GP surgeries due to the increased GP to patient ratio. Mitigation has been recommended in the form of contributions for GP surgeries with the residual impact predicted to be negligible.
- 5.79 Considering the predicted child yield and existing provision, the Proposed Development is expected to have a minor adverse impact on childcare provision, a negligible impact on local primary schools, and a negligible impact on secondary schools. Mitigation has been recommended in the form of contributions for childcare services with the residual impact predicted to be negligible.
- 5.80 The Proposed Development will have a negligible impact on crime and provide a variety of open space areas including allotments and play areas resulting in a beneficial impact for future and local residents. To mitigate against increased demand for existing community space, youth services and libraries, contributions are recommended. This will result in a negligible to moderate beneficial residual impact.
- 5.81 In summary, Socio-economic impacts on future and local residents due to the Proposed Development will be **beneficial or negligible**. After incorporation of appropriate mitigation measures, no adverse impacts are predicted.
- 5.82 **Climate Change (Chapter 16):** Prior to mitigation, the climate resilience assessment identified surface water flooding, overheating, soft landscaping failure and water shortages as the principal climate-related risks to the Proposed Development over its design life. The magnitude of these risks increases over time in line with projected increases in temperature, changing rainfall patterns and the greater frequency of extreme weather events.
- 5.83 The Proposed Development incorporates a comprehensive range of embedded climate adaptation measures designed to improve long-term resilience. These include a Sustainable Drainage System (SuDS) comprising attenuation features, permeable paving, rainwater management and controlled discharge; passive building design measures to minimise overheating through building orientation, dual-aspect dwellings, cross ventilation, openable windows and glazing with appropriate solar control; and a robust landscape strategy incorporating climate-resilient planting, habitat enhancement, wetland features and integrated green infrastructure to improve biodiversity and adaptation to future climatic conditions.
- 5.84 Following implementation of these measures, the residual climate resilience effects are predicted to comprise:

- Negligible effects in relation to surface water flooding throughout the assessment period;

- Minor Adverse (not significant) effects associated with overheating throughout the operational lifetime; and
- Negligible effects in the 2030s, reducing to Minor Adverse (not significant) effects in the 2060s and 2090s for soft landscaping, reflecting the long-term uncertainties associated with future climate projections.

5.85 Whilst uncertainty remains inherent in future climate projections, the adaptation measures incorporated within the Proposed Development represent current best practice and provide a robust and flexible framework to enhance resilience throughout the lifetime of the development.

5.86 The Proposed Development also incorporates a range of embedded greenhouse gas mitigation measures to minimise emissions during construction and operation. These include:

- Implementation of a Site Waste Management Plan and Waste Minimisation Strategy during construction;
- Promotion of sustainable travel through the Travel Plan, improved pedestrian and cycle infrastructure, public transport initiatives, car sharing and electric vehicle charging infrastructure; and
- Application of the energy hierarchy through a fabric-first approach, high-performance building fabric, efficient building services and on-site photovoltaic generation to reduce operational energy demand and carbon emissions.

5.87 Following the implementation of these embedded mitigation measures, the residual greenhouse gas effects are assessed as:

- Minor Adverse (not significant) for construction embodied carbon;
- Minor Adverse (not significant) for operational transport emissions; and
- Minor Adverse (not significant) for operational energy emissions.

5.88 The operational transport assessment has been undertaken using current DESNZ greenhouse gas emission factors and therefore represents a precautionary assessment. Transport-related emissions are expected to reduce over the operational life of the Proposed Development as vehicle electrification and wider transport decarbonisation continue.

5.89 Overall, the Proposed Development has been designed to minimise greenhouse gas emissions and improve resilience to future climate change through embedded mitigation and adaptation measures that accord with national policy, the Wiltshire Core Strategy and current best practice. Subject to the implementation of these measures, the residual effects relating to climate change resilience and greenhouse gas emissions are **not considered to be significant** within the context of the Environmental Impact Assessment.

(iii) Non-EIA Technical Assessments

5.90 The application submission includes assessment across a range of technical disciplines which are reported as standalone assessments that have not been scoped in the ES. A summary of the key findings against the various technical disciplines is set out below:

5.91 **Agricultural Land Classification Report:** Paragraph 187 of the NPPF requires planning decisions 'to contribute to and enhance the natural and local environment'. Footnote 65 of the NPPF confirms where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

- 5.92 The report notes that the soils of the site are slowly permeable clays, with significant drainage restrictions, and concludes that wetness limits land quality to Subgrade 3b.
- 5.93 **Arboricultural Survey and Impact Assessment:** confirms that it is only necessary to remove one hedge on the northern parcel. No trees are proposed for removal.
- 5.94 All retained trees and hedges will be protected from development activity by robust physical barriers erected at the extent of their root protection areas (RPAs), which can be secured by a suitably worded compliance planning condition. The proposed development does not require any encroachments into the RPA of a retained tree or hedge.
- 5.95 **Biodiversity Net Gain:** the BNG assessment has confirmed that the proposals is capable of delivering both the on-site SANG required by Natural England and the statutory Biodiversity Net Gain requirement under the Environment Act 2021 and Schedule 7A of the Town and Country Planning Act 1990.
- 5.96 The Proposed SANG would deliver a net gain of 27.0% for area-based habitats and 88.9% for hedgerows, exceeding the statutory 10% requirement and satisfying the relevant trading rules. To demonstrate additionality, a separate minimum-standard SANG test has been undertaken using the same broad layout but excluding the habitat enhancements introduced specifically for BNG. This test results in a 19.3% loss of area-based habitat units, confirming that the reported gain arises from additional grassland enhancement, woodland creation, tree planting and hedgerow enrichment, rather than from the SANG provision alone.
- 5.97 Watercourse units increase by 4.5%, leaving a shortfall of approximately 0.09 units. The shortfall may be addressed on site by further design development or could be addressed through the purchase of off-site credits.
- 5.98 **Design and Access Statement:** the design approach is set out in the enclosed DAS with the design strategy informed by an area context assessment and the LVA process. The design has also been informed pre-application advice from the Council, and consultation with the local community.
- 5.99 The proposed masterplan shows how the proposed mixed-use scheme has responded to the constraints and opportunities of The Site. The spatial layout of the scheme has been driven by landscape and ecology considerations being sensitive to the countryside edge while enhancing existing habitats, to create a place with a substantial quantum of public open space, incorporating SANG.
- 5.100 The proposal will deliver a mix housing that will include both affordable homes and those for open market sale with a range of accommodation sizes suitable for occupation by families.
- 5.101 The submitted Design and Access Statement demonstrates how the proposals respond positively to the requirements of Core Policy 57 Ensuring high quality design and place shaping, the requirements of National Design Guide and WCS Policy CP58: the NPPF, and Council's Design Guide SPD (2023).
- 5.102 **Education Impact and Mitigation Statement:** the forensic analysis of published demographic data, and data provided by the Council following a freedom of information request, concludes that there is no justification for contribution Early Years, Primary or Secondary School places.

- 5.103 **Energy Statement:** demonstrates that the proposals are in full compliance with WCS Policy 41 and that the development is fully future proofed for upcoming changes to the Building Regulations through the omission of on-site combustion. It has been further demonstrated that the calculated internal maximum water consumption will no more than 110 litres per occupier per day.
- 5.104 **Fire Statement:** together with the submitted Fire Tender Tracking Plots demonstrates that the proposal is compliant with approved Building Regulations Document B (Fire Safety).
- 5.105 **Flood Risk Assessment and Drainage Strategy:** In addition to the ES Chapter 12, the application is supported by an FRA and Drainage Strategy, which includes: (i) information on the existing infrastructure and hydrological conditions; (ii) an assessment of flood risk; (iii) mitigation of risk – fluvial, finished floor levels and surface water management; (iv) a surface water drainage strategy aligned with the SuDs hierarchy; (v) management of surface water during construction; (vi) operational maintenance; and (vii) foul water drainage arrangements.
- 5.106 The assessment concludes that:
- The vast majority of the site is located within Flood Zone 1.
 - Small isolated areas adjacent to the Bitham Brook Tributary are located within Flood Zone 2.
 - The proposed built development is located entirely within Flood Zone 1.
 - The site is at very low risk from tidal, groundwater, sewer and reservoir flooding.
 - Surface water flooding represents the principal source of flood risk; however, this can be effectively managed through the proposed drainage strategy.
 - Existing drainage ditches intercept upstream catchment runoff and will be retained or diverted as part of the development.
 - Finished floor levels and development setbacks provide suitable freeboard above modelled flood levels including climate change allowances.
- 5.107 The proposed surface water drainage strategy adopts Sustainable Drainage Systems (SuDS) principles and includes attenuation ponds, permeable paving, rainwater harvesting, retained drainage ditches and controlled discharge to the Bitham Brook Tributary. The drainage system has been designed to accommodate the 1% Annual Exceedance Probability rainfall event with the required climate change and urban creep allowances. The proposed development is therefore considered appropriate in terms of flood risk and drainage.
- 5.108 On the basis that the development will not increase flood risk either on-site or elsewhere, the proposal is compliant with WCS Policy 67; the NPPF, National SuDs guidance and Wiltshire Council's drainage requirements.
- 5.109 **Heritage and Archaeology:** It is concluded that having regard to the fallback position of the employment allocation and unimplemented reserved matters employment schemes, that the identified 'less than substantial harm' arising to the setting of the grade II listed Hawkeridge Farmhouse, would be outweighed by the public benefits of the application proposal, as summarised in Section 6.0. A planning condition secure the recommended archaeological mitigation which will augment previous archaeological assessments undertaken pursuant to outline employment permission. On this basis the proposal is considered to be in compliance with WCS Policy 58, Paragraphs 207 and 212 - 216 of the NPPF and applicable heritage legislation.

- 5.110 **Landscape Statement: has been informed by** fieldwork observations undertaken in the summer of 2025 and more recently in February and March 2026. The Landscape Design Statement covers the Site's background information and context; and outlines proposals which take into account Site constraints and opportunities. The landscape strategy is allied to the recommendations identified within the Landscape and Visual Impact Assessment (LVIA) chapter of the Environmental Statement which accompanies this application. The finalised landscape design accords with WCS Policy 51 and the Council's Green and Blue Infrastructure Strategy (2022).
- 5.111 **Shadow Habitat Regulations Assessment:** has considered the impact of the proposed development pursuant to Regulation 63 of the Habitats Regulations on a mandatory stepwise process. The sHRA includes assessments of the potential impacts upon the Salisbury Plain Special Protection Area and the Bath and Bradford on Avon Special Area of Conservation.
- 5.112 In respect of the Salisbury Plain SPA, it is concluded that in the absence of mitigation the Proposed Development has the potential to affect the integrity of the SPA (qualifying bird features) through recreational disturbance. Proposed mitigation takes the form of the provision of an onsite SANG and Strategic Access Management and Monitoring (SAMM) contribution.
- 5.113 In respect of the Bath and Bradford on SAC, it is concluded that in the absence of mitigation the proposal has the potential to affect the integrity of the SAC through loss and fragmentation of commuting and foraging flyways (development and lighting). No SAC bat roosts are present or affected. Proposed mitigation takes the form of the provision of dark perimeter corridors, and enhanced foraging and commuting habitat through new woodland, hedgerow and species rich grassland creation, in accordance with the Trowbridge and Westbury Bat Mitigation Strategy (2025).
- 5.114 The sHRA concludes in respect of site conservation objectives, that the Proposed Development (taking into account the scheme's mitigation measures) will not have an adverse effect on the integrity of the Bath and Bradford on Avon SAC or the Salisbury Plain SPA.
- 5.115 **Statement of Community Engagement:** demonstrates that the applicant has undertaken thorough pre-application discussions with local stakeholders and the wider community and actively involved them in the design development process in accordance with guidance in the NPPF and the Localism Act 2011. The Statement gives details of all consultation activity undertaken and summarises all comments received and how they have informed the final round of the design changes prior to the submission of the planning application
- 5.116 **Transport Assessment and Travel Plans:** In addition to the ES Chapter 9, the application is supported by a Transport Assessment with an appended residential Travel Plan. The Transport Assessment includes: (i) a comprehensive overview of The Site and surroundings; (ii) an appraisal of accessibility of The Site; (iii) baseline travel data; (iv) an impact assessment of the proposals; (v) mitigation of transport impacts.
- 5.117 Transport Assessment has demonstrated that the proposed development would reduce vehicular travel demand relative to the permitted employment scheme, with further reductions in car use achieved through works and measures to promote active travel. With no adverse residual transport impacts in terms of capacity or highway safety, the proposal is

acceptable in transport terms

- 5.118 The proposed off-site highway works can be secured via a s.278 agreement, and the proposed travel plan monitoring and implementation via a planning obligation. As such, the proposals are considered acceptable in highway terms and are in conformity with WCS CP61.
- 5.119 **Waste Minimisation Strategy:** The enclosed Waste Minimisation Statement sets out the proposed waste minimisation strategy for the site in compliance with WCS Policies 3 and 32; and Waste Core Strategy Policies: WCS1, WCS5, and WCS6.

(iv) Residential Amenity

- 5.120 It is concluded that the proposals will preserve the residential amenity of existing adjacent residents through a combination of the provision of buffers and orientation of the proposed dwellings.
- 5.121 New residents will be provided with high quality new homes benefiting from sufficiently sized private garden areas, whilst also enjoying appropriate levels of privacy and outlook. On this basis, the proposal is considered to be compliant with WCS Policy 57.

(v) Affordable Housing Statement

- 5.122 The acknowledged national housing crisis has arisen as a direct consequence of too few houses being completed to keep pace with a growing population, increasing life expectancy, and household formation rates.
- 5.123 Paragraph 61 of the NPPF states:
- “It is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”*
- 5.124 The Ministerial Statement, titled ‘Building the Homes We Need’ published on 30th July 2024 stresses the severity of housing crisis facing the country, which is characterised as ‘..the most acute housing crisis in living memory’.
- 5.125 A subsequent Ministerial Statement also titled ‘Building the Homes We Need’ published on 12th December 2024 states:
- “It is also vital that, alongside the appropriate infrastructure, these reforms also deliver substantial affordable housing. It is vital that local communities can see the benefits of development terms of enhancements to public services and more affordable housing for local people.”*
- 5.126 Core Policy 43 of the Wiltshire Core Strategy (2015) sets the local requirements relevant to this application in terms of delivering affordable housing. The Site lies with the 40% affordable housing provision zone. As at 31st March 2024 there were 8,727 household in need on the waiting list across Wiltshire’s administrative district.
- 5.127 Core Policy 45 relates to the type, mix and size of both market and affordable housing. The policy states that the type, mix and size of new housing should reflect the demonstrable need for the community within which the site is located.

5.128 Pre-application advice on housing mix and tenure was provided by the Council in 2025. The advice set out detailed requirements in respect of affordable housing mix and housing tenure comprising: (i) affordable rent; (ii) shared ownership; and (iii) first homes. It should be noted that this advice informed viability appraisals and the agreed contractual arrangement between the joint applicants. A summary of the proposed 100 affordable housing units, to provided at nil-subsidy, is set out below:

AFFORDABLE HOUSING									
AFFORDABLE RENTED									
1B MAIS	HORNER (1B2P)	549	51.0	2	1		3	1,647	153
	HICKS (1B2P)	549	51.0	2	1		3	1,647	153
1B MAIS	NAILSMITH (1B2P)	631	58.6	2	1		4	2,524	234
	DYER (1B2P)	641	59.6	2	1		4	2,564	238
2B MAIS	WHITE (2B3P)	816	75.8	2	2		3	2,448	227
2B	GRESHAM (BUN)	769	71.4	1	2		4	3,076	286
2B	BAKER (2B4P)	861	80.0	2	2		16	13,776	1,280
3B	TILLMAN (3B5P)	1015	94.3	2	3		17	17,255	1,603
4B	PUBLICAN (4B7P)	1246	115.8	2	4		6	7,476	695
AFFORDABLE RENTED TOTAL							60	52,413	4,869
SHARED OWNERSHIP									
2B	BAKER (2B4P)	861	80.0	2	2		9	7,749	720
3B	TILLMAN (3B5P)	1015	94.3	2	3		6	6,090	566
SHARED OWNERSHIP TOTAL							15	13,839	1,286
FIRST HOMES									
1B MAIS	HORNER (1B2P)	549	51.0	2	1		2	1,098	102
	HICKS (1B2P)	549	51.0	2	1		2	1,098	102
1B MAIS	NAILSMITH (1B2P)	631	58.6	2	1		1	631	59
	DYER (1B2P)	641	59.6	2	1		1	641	60
2B MAIS	WHITE (2B3P)	816	75.8	2	2		2	1,632	152
2B	BAKER (2B4P)	861	80.0	2	2		12	10,332	960
3B	TILLMAN (3B5P)	1015	94.3	2	3		5	5,075	471
FIIRST HOMES TOTAL							25	20,507	1,905
Sub Total (Affordable)							100	86,759	8,060

Figure 18. Extract from Accommodation Schedule setting out the Proposed Affordable Housing provision of 100 No. units.

(vi) S.106 Heads of Terms

5.129 Draft Heads of Terms for the required s.106 agreement to mitigate the impact of the proposals, having regard to pre-application advice and further analysis undertaken by the applicant team, are set out below:

- Affordable Housing: 40% provision in accordance with the housing type and tenure mix prescribed in the pre-application advice
- Air Quality contribution: if justified pursuant to the requirements of the Air Quality SPD taking into account the fallback position of the allocate employment site and implemented outline planning permission.
- Bat mitigation contribution: pursuant to the requirements of TWBMS SPD
- Biodiversity Net Gain credits (NB. purchase off-site provision of water credits in event that an onsite solution for the delivery of 0.09 water habitat units cannot be acheived)
- Education contributions: notwithstanding the pre-application advice, demographic analysis and advice set out in the Education Impact and Mitigation Statement prepared

by specialist consultants, EHP, concludes that no education contributions will be required to mitigate the impact of the development.

- Highways: monitoring and implementation of residential and commercial travel plans; and contributions active travel enhancements e.g. bus stop replacement etc.
- Public Open Space: on site provision and management
- Strategic Access Management and Monitoring: contribution to be determined as part of the Salisbury Plain SPA mitigation.
- Sports pitches and courts: off-site contribution in lieu of on-site provision
- Waste: standard contribution to waste and recycling containers
- Public Rights of Way: route improvements within and adjacent to the site –scope to be agreed

5.130 Other contributions may be identified through the planning consultation process, and subject to meeting the appropriate tests of necessity and reasonableness, consideration will be given to their inclusion.

5.131 Mitigation works proposed on the public highway can be secured under s.278 of the Highway Act 1980.

6.0 Planning Balance and Conclusion

- 6.1 Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 For the reasons set out in Section 5.0 above, and the Market Advice Report prepared by Knight Frank, the comprehensive and sustained site marketing (12+ years), the circumstances around the withdraw Amazon application in 2023, which has blighted the site, and structural changes in the logistics and employment land market, have led the landowner and their advisors to conclude that the application is unviable for employment development.
- 6.3 In this context, it is entirely rational for the joint applicants to have responded to market signals and formulate an alternative viable mixed-use proposal, in partnership with a housing delivery partner, that can benefit from the already installed site access, drainage and green infrastructure and deliver much needed commercial and housing development.
- 6.4 The enclosed full planning application is made in the context of the Government's stated aim in national planning policy to support economic growth through the provision of new commercial development and to significantly boost the supply of homes on suitable sites.
- 6.5 The NPPF's 'presumption in favour of sustainable development' is engaged on the basis that the Council cannot demonstrate a 5-year housing land supply. As noted in Sections 4.0 and 5.0 above, the Council has a persistent lack of housing land supply that will not be addressed until the new Wiltshire Local Plan is adopted in April 2029.
- 6.6 The non-residential element of the proposals will provide new retail and drive-through facilities will be beneficial for commercial occupiers of the adjacent West Wiltshire Trading Estate as well as existing and proposed residents proximate to the site including in the permitted and pending residential schemes identified in the planning history in Section 2.0.
- 6.6 The proposed care home will meet local demand for dementia and domiciliary care provision and respite provision for carers, meeting acknowledged national shortage of care homes.
- 6.7 The housing element of the mixed-use scheme responds to the Council's persistent inability to demonstrate a 5-year housing land supply across its administrative area, and also the acute need for new affordable homes as noted in Section 5.0 above.
- 6.8 The mixed-use masterplan has evolved through an iterative process of design development that has been informed by pre-application engagement with the Council and local community engagement. The finalised design is a culmination of a design process led by the applicant's multi-disciplinary design team and other specialist consultants providing input across a range of applicable site surveys and technical disciplines.
- 6.9 The principles outlined within the Design and Access Statement would secure a high-quality scheme. The NPPF's policies on the delivery of sustainable housing development carry significant weight, and the delivery of the proposed development would support housing and economic development objectives and meet the aims and objectives of sustainable development, securing net gains across all three dimensions of the NPPF's sustainable development tests: economic; social; and environmental.

- 6.10 On the basis of the analysis set out in Section 5.0 above, it is considered that the proposed development comprises sustainable development in the context of national planning policy, set out in the NPPF, and accords with relevant development management policies in the statutory development plan.
- 6.11 The transport, landscape and heritage impacts of the proposed built development are tempered by the planning fallback position of the employment allocation and extant reserved matters employment approvals, as well as the already constructed access infrastructure and street lighting, and in any event are appropriately mitigated by the landscape-led design proposals.
- 6.12 The table below sets out a weighting assessment of the key planning issues to assist the titled planning balance assessment (NB. this graphically represented in 'traffic light' colour coding with each matter assessed at the operational phase of development with proposed mitigation):

Planning Issue	Weight	Comment / Report Reference
Contribution to housing land supply and benefits of housing provision	Beneficial	Comment: estimated delivery of 120 homes within the current five-year housing land supply trajectory with the balance of homes to follow within a further 2-years. References: PS: 4.26 & 5.20; and Accommodation Schedule
Delivery affordable housing	Beneficial	Comment: 40% provision of nil-subsidy affordable housing in accordance with the pre-application advice provided in respect of affordable housing mix and tenure. References: PS 5.113-5.119; and Accommodation Schedule
Delivery of nursing home	Beneficial	Comment: delivery of 64-bed care home will meet a local need for domiciliary, dementia and respite care References: PS 5.32 and Footnote 13
Delivery of convenience retail and Retail/Commercial floorspace	Beneficial	Comment: the retail and commercial development will meet existing and proposed local need for convenience retail and will provide facilities for employees at the WWTE. References: PS 5.14-5.16; and Retail Impact Assessment
Economic Development Benefits	Beneficial	Comment: the proposal will deliver a substantial range of economic development benefits and will make significant contribution to the local area's gross value added (GVA). References: PS 5.30-5.36; Economic Benefits Report and Infographic; and ES Chapter 15 – Socio Economics
Design quality	Beneficial	Comment: the masterplan follows best practice in place-making and is explicitly landscape-led. References: Design and Access Statement; Landscape Statement; and Landscape Visualisations
Traffic	Moderate Beneficial	Comment: noting the planning fallback position of the employment allocation, and

		permitted outline and RMA planning history, the proposed mixed-use scheme would result in a significant reduction in HGV movements. On this basis, the traffic impact has been judged to be minor adverse. References: ES Chapter 7 – Transport and Access; and Transport Assessment and Travel Plans.
Biodiversity net gain	Moderate Beneficial	Comment: the application site will deliver significant biodiversity net gains for area-based habitat and hedgerows significantly in excess of the mandatory 10% requirement. The proposal will also deliver a positive net gain in respect of the Bitham Brook watercourse. References: BNG Report and Metric
Active travel and public transport	Minor Beneficial	Comment: the implementation of the Glenmore Farm residential scheme combined with the proposed off-site works, will deliver viable active travel links to Westbury and the surrounding area. Existing bus stops are within the application site redline and the mainline railway station at Westbury lies 1.3km from the site. References: ES Chapter 7 – Transport and Access; and Transport Assessment and Travel Plans.
Ecological impact	Minor Beneficial	Comment: implementation of the proposed SANG, dark perimeter corridors, new landscape and comprehensive site wide management, and off-site access and enhancement to the PROW network are measures that in combination will ensure that the proposal will not have significant impacts upon the Clanger Wood SSSI, the Bath and Bradford on Avon SAC, and the Salisbury Plain SPA. The provision of new high quality managed habitat has been assessed as having a minor beneficial impact. References: ES Chapter 11 – Ecology and Biodiversity; and shadow Habitat Regulations Assessment (sHRA)
Social and community benefits	Minor Beneficial	Comment: the proposal will introduce a new balanced and mixed residential community to the northwest of Westbury in combination with the adjacent permitted and proposed residential schemes. The package of s.106 contributions will mitigate the impact of proposal. CIL contributions will be available for re-investment in the local area. References: ES Chapter 15 – Socio Economics; Education Impact and Mitigation Statement; and Economic Benefits Report.
Air Quality	Neutral	Comment: the Site does lie within an AQMA. With mitigation the proposal will have a negligible impact on Air Quality.

		References: ES Chapter 8 – Air Quality
Agricultural and soils	Neutral	Comment: although the proposal will result in the loss of arable agricultural land, the site has poor drainage and has been classified as Subgrade 3b. The residual potential contamination impact has been assessed as being neutral. References: ES Chapter 13 – Soils, Geology and Contaminated Land; and Agricultural Land Classification Report
Arboriculture	Neutral	Comment: no existing trees are proposed for removal. Subject to the installation of tree protective fencing during the construction phase there will be no adverse impacts on existing trees to be retained. References: Arboricultural Method Statement.
Archaeology	Neutral	Comment: Archaeological assessment was undertaken pursuant to the extant employment planning permission. The additional archaeological knowledge and understanding gained from implementation of the proposed programme of archaeological mitigation works during the construction phase is considered likely to be sufficient to offset the assessed slight/moderate adverse significance of effect upon buried archaeological remains prior to mitigation, reducing the residual effects to neutral. References: ES Chapter 14 – Archaeology and Cultural Heritage
Noise and vibration	Neutral	Comment: following an analysis of noise surveys the impact of the proposal upon future occupiers will be minor to negligible subject to recommended mitigation. References: ES Chapter 9 – Noise and Vibration.
Sustainable construction, climate change and energy	Neutral	Comment: the mixed-use development follows a fabric first approach to design. The housing scheme has been designed to Future Homes Standards. References: ES Chapter 16 – Climate Change; and Energy Strategy
Water environment, flood risk and drainage	Neutral	Comment: all new buildings and roads will be wholly located in Flood Zone 1. The proposal has been designed in full compliance with national SuDs guidance with surface water being collected and attenuated by swales and ponds and being discharged into the Bitham Brook. Foul drainage will connect into the existing mains system. References: ES Chapter 12 – Water Quality, Hydrology and Flood Risk; Flood Risk Sequential Test; and Flood Risk Assessment and Drainage Strategy.

Built Heritage	Minor adverse	Comment: the site adjoins the curtilage of the grade II listed Hawkeridge Farmhouse. Having regard to the planning fallback position of the employment allocation and employment planning history, the impact of the proposal has been assessed at the slight adverse level. The less than substantial harm to the setting of the Hawkeridge Farmhouse is outweighed by the public benefits of the proposal. References: ES Chapter 14 – Archaeology and Cultural Heritage; Heritage and Archaeology Statement; and PS 6.13 (public benefits)
Landscape and Visual	Minor adverse	Comment: the Site is not subject any national or local landscape designations. With mitigation, at 15 years post development, the proposal will deliver lasting landscape enhancement through maturing with only close-range receptors experiencing a minor adverse impact. References: ES Chapter 10 – Landscape and Visual Amenity; Landscape Statement; and Landscape Visualisations

Table 7. Weighting Assessment of Planning Matters

6.13 The planning and public benefits of the proposal, which form part of the overall planning balance, are summarised as follows:

- A high-quality mixed-use development that is well located and connected to Westbury being adjacent to the existing (and emerging) built-up area, with access to local services and community facilities and public transport links to other higher order settlements.
- Adaptation and full utilisation of existing vehicular access, foul drainage and green infrastructure that was installed to promote the permitted business park.
- Delivery of non-residential development that will provide retail and drive-through facilities for both existing businesses and households, and permitted and pending residential developments, proximate to the site.
- Delivery of new care home that will meet local needs for domiciliary and dementia care and provide respite opportunity for careers in the local area.
- Delivery of 249 No. new homes by a respected public limited company home builder, with a track record of delivery in Wiltshire which will make a valuable contribution towards the Council's well documented housing land supply shortfall, and will ensure continuity of supply while the new Wiltshire Local Plan is being progressed over the 30-month preparation period prescribed by new local plan making regulations.
- Provision of a mix of open market and affordable housing to meet open market housing demand and local housing need including the provision of policy compliant element of 40% affordable housing provided on a nil-subsidy basis.
- Provision of off-site highway works to maximise opportunity for active travel to access local services and facilities.
- Substantial provision of onsite public open space with SANG provision combined with off-site enhancement to the wider footpath network to reduce the potential for recreational pressure on the Picket and Clanger Wood SSSI.

- Provision of onsite biodiversity net gain through habitat retention, enhancement and creation with a net gain of: areas habitats +27.0%%; hedgerow +88.9%; and watercourse +4.5%.
- Coordinated provision of green and blue infrastructure that will attenuate and manage the discharge of surface water so as to not create any downstream flood risk whilst also providing a betterment over the existing situation.
- Construction phase expenditure providing employment and training opportunities on site and local supply chain support.
- Net jobs during the construction phase: c. 277 FTE
- Estimated GVA from the construction phase: £30.5
- Estimated GVA from the operational phase: £3.8m per annum
- Post development on site employment: c.68 FTE
- Future resident expenditure: c.£6.7m
- Council Tax contributions: c.£1.2m per annum
- Business Rates: c.£65k per annum
- Community Infrastructure Levy: c.£1.9m of which 15% will be available to the local Parish Council for reinvestment in local community infrastructure with the 85% balance being available to Wiltshire Council.

- 6.14 The Environmental Assessment and Technical Reports demonstrate that there are no technical or environmental impacts, and/or constraints that would significantly and demonstrably outweigh the substantial benefits of the proposal and specific policies of the Framework and Development Plan do not indicate that development should be restricted.
- 6.15 The proposals will give rise to some limited impacts during the construction phase of the development, but these will be temporary in nature and extent and can be controlled through the use of planning conditions.
- 6.16 In accordance with Paragraph 11d of the NPPF, and on the basis that the proposal is demonstrable compliant with applicable development management policies and legislation, the Council is respectfully requested to grant full planning permission.