

Planning Statement

“Demolition of redundant farm buildings and construction of 4 no. dwellings”

In respect of:

Guest Farm, Rixon Gate, Ashton Keynes, Wiltshire, SN6 6PH

On Behalf of:

J West Developments Ltd.

Date of Document

April 2026



McLOUGHLIN
PLANNING



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1.0 Introduction

- 1.1. McLoughlin Planning has been instructed by J West Developments Ltd. ("the Applicant") to prepare and submit a Full Planning Application to construct 4 no. dwellings at Guest Farm, Rixon Gate, Ashton Keynes, Wiltshire, SN6 6PH ("the site").
- 1.2. The Applicant recently obtained pre-application advice from Wiltshire Council ("the Council") for a 4-unit residential development at the site. The pre-application advice, which has been appended to this Statement, was supportive of the principle of residential development in this location. However, concerns were raised regarding the design/layout and the potential impact on the setting of the nearby Ashton Keynes Conservation Area.
- 1.3. This Planning Statement will explain how the proposal has been revised to address these concerns, and it will set out an unequivocal case for planning permission to be granted. The Planning Statement is structured as follows:
 - **Section 2** – Site Description and Planning History
 - **Section 3** – Planning Policy Context
 - **Section 4** – Analysis of Planning Considerations
 - **Section 5** – Conclusion
 - **Section 6** – Appendix: Historic Map and Pre-application Advice Letter
- 1.4. The Planning Application is accompanied by the following documents:
 - Architectural Drawings – Tyack Architects
 - Bat Emergence and Re-Entry Surveys – Arbtech
 - Biodiversity Net Gain Assessment – Arbtech
 - Biodiversity Net Gain Metric – Arbtech
 - Preliminary Ecological Appraisal – Arbtech
 - River Condition Assessment – Arbtech
 - Tree Survey – Arbtech
 - Highways & Transport Technical Note – The Transport Consultancy (TTC)
 - Flood Risk Assessment – K-Ten Consulting



2.0 Site Description and Planning History

Site Description

- 2.1. The site comprises a series of redundant agricultural buildings on a site measuring approximately 0.4 hectares. The site is located at the junction of Rixon Gate and Kent End at the eastern end of the village of Ashton Keynes. Bradstone Sports Field is located to the east of the site. Undeveloped fields are located to the south, with a single dwelling located immediately west of the site. The principal built-up part of the village is situated to the west and north-west of the site.
- 2.2. There is a Public Right of Way (ref: AKEY22) that runs down the centre of the site from the existing access point at Rixon Gate to the fields to the south-east. AKEY22 eventually joins up with AKEY21 to the east which runs through the centre of the playing surface at Bradstone Sports Field.
- 2.3. An unnamed stream or similar type of watercourse is located along the eastern boundary of the site. This results in small segments of the site being in Flood Zone 2, but the majority of the site is in Flood Zone 1, the lowest-risk category.
- 2.4. The site is within the Zone of Influence for the North Meadow Special Area of Conservation (SAC).

Planning History

- 2.5. The application site has not been the subject of any recent or relevant planning applications. However, the semi-detached properties to the west of the site were the subject of two planning applications, as summarised below.
 - N/82/00935/F – Extension to dwelling for self-contained accommodation – Approved, 14 December 1982.
 - N/79/01042/OL – For agricultural bungalow & Garage – Refused, 24 September 1979



3.0 Planning Policy Context

- 3.1. This Section of the Statement sets out the planning policies that are relevant to the determination of this planning application. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions should be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 3.2. In this case, a significant material consideration is the fact that the Council is unable to demonstrate a Five-Year Housing Land Supply, which renders the Development Plan out-of-date pursuant to footnote 8 of paragraph 11 d) of the National Planning Policy Framework. This will be discussed in greater detail below.

Wiltshire Core Strategy

- 3.3. The Core Strategy was adopted in January 2015 and is the primary Development Plan document for determining planning applications in Wiltshire. It provides up-to-date strategic planning policy for Wiltshire, covering the period up to the year 2026. The policies most relevant for dealing with the proposal are as follows:
- **Core Policy 1: Settlement Hierarchy** – Ashton Keynes is categorised as a Large Village. The policy states development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.
 - **Core Policy 2: Delivery Strategy** – this sets out the indicative housing requirements throughout Wiltshire, with the figure for the Malmesbury Remainder (excluding the town) as 510 dwellings.
 - **Core Policy 13: Spatial Strategy: Malmesbury Area** – this identifies Ashton Keynes as a Large Village which supports housing growth in accordance with Core Policy 1.
 - **Core Policy 50: Biodiversity and Geodiversity** – All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.
 - **Core Policy 57: Ensuring High Quality Design and Place Shaping** – A high standard of design is required in all new developments. Development is



expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

- **Core Policy 58: Ensuring the Conservation of the Historic Environment** – Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance.
- **Core Policy 67: Flood Risk** – This states that: “*Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice.*”

Ashton Keynes Neighbourhood Plan 2015 - 2026

- 3.4. The Neighbourhood Plan was made in May 2017, and it also forms part of the Development Plan for any application within Ashton Keynes. Policies HSP1 and HSP2 together support and allocate residential development at the AB Carter Haulage site. Planning permission was granted at the site for 10 dwellings in September 2022 (ref: 20/09696/FUL) and the development has now been constructed.
- 3.5. Policy HSP3 supports applications for residential developments on windfall and infill sites within the Settlement Boundary, subject to criteria regarding scale, form, amenity and access.

National Planning Policy Framework (NPPF)

- 3.6. The NPPF was most recently updated in December 2024 and is a material consideration in all planning decisions in England. This update led to an increase in Wiltshire Council's annual housing requirement, which in turn caused its five-year housing land supply to fall even further, with the shortfall figure confirmed as 2.42 years in a recent appeal decision dated 22 October 2025 (ref: 3363961).
- 3.7. The NPPF provides formal guidance to all parties involved in the planning system and covers a wide range of issues relating to sustainable development. The most relevant paragraphs within the NPPF for this proposal are summarised below.



Paragraph 11 c) - Presumption in Favour of Sustainable Development

- 3.8. For decision taking, Paragraph 11 c) states that sustainable development means *"approving development proposals that accord with an up-to-date Development Plan without delay."*
- 3.9. The term 'out-of-date' is defined in Footnote 8 of the NPPF and it states it applies to situations like the one Wiltshire Council is currently experiencing, where a local planning authority cannot demonstrate a five-year supply of housing. Therefore, if there were to be any conflict found with the Development Plan, planning permission should still be granted unless limb i. or ii. of Paragraph 11 d) below is applicable.

Paragraph 11 d) - Tilted Balance

"where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

Paragraph 14 - Neighbourhood Plans

- 3.10. *"In situations where the presumption at paragraph 11 d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:*
- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
 - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement."*
- 3.11. The Ashton Keynes Neighbourhood Plan was in May 2017 made over eight years ago and it contains policies and allocations designed to meet its identified housing requirement, thus satisfying both criteria. Therefore, with the Development Plan out-



of-date pursuant to paragraph 11 d), the high threshold set out within paragraph 14 of allowing new housing development contrary to the Neighbourhood Plan, having significantly and demonstrably adverse impacts, does not apply to this application. In summary, the Neighbourhood Plan is also out-of-date.

Paragraph 175 - Sequential Test for Flood Risk

- 3.12. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).

Paragraph 215

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



4.0 Assessment of Planning Considerations

4.1. The purpose of this section of the Statement is to set out why planning permission should be granted, having fully assessed all of the relevant planning considerations, with each of the following taken in turn:

- Principle of Development
- Design and Layout
- Impact on the Setting of the Ashton Keynes Conservation Area
- Biodiversity
- Mitigation of Recreational Pressure on an SAC
- Arboriculture
- Flood Risk and Drainage
- Highway Safety and Parking
- Effect on Living Conditions of Neighbouring Residents

Principle of Development

- 4.2. The Council acknowledged in their pre-application advice that, despite being contrary to the spatial strategy set out in the Core Strategy insofar as the site is located outside of the Settlement Boundary for Ashton Keynes, *"the site is not considered to be an unsuitable location for a small residential development."*
- 4.3. The Council went on to acknowledge that future occupiers of the four proposed dwellings would have good access to local services within the village. They also noted that the site is adjacent to the Settlement Boundary on two sides. The Council acknowledged in their pre-application advice that, considering the site's location in proximity to Ashton Keynes' services and amenities, the conflict with the Settlement Boundary is outweighed by the benefits of the site's location, particularly in the context of the Council's Five-Year Housing Land Supply (5YHLS) deficit.
- 4.4. Purely in Development Plan terms, the location of the proposed development conflicts with Core Policy 1 of the Core Strategy because of the site's position outside of the Ashton Keynes Settlement Boundary. However, as detailed in the previous Section of this Statement, the Core Strategy and the Neighbourhood Plan are both out-of-date



and the NPPF's presumption in favour of sustainable development is engaged, hence the planning application is permissible on this basis.

- 4.5. Contextually, while the site is located at the eastern end of the village, it is also within its built-up area and not in an isolated countryside location, with dwellings located to the north and west of the site on the opposite side of Rixon Gate. Ashton Keynes is defined as a Larger Village due to its service provision, which includes a primary school, village pub, village shop and village hall, all of which are within an approximate 10-minute walk of the site.
- 4.6. NPPF paragraph 11 d) i. states that planning permission should be granted for sustainable development such as this, unless areas of particular importance (National Landscape, National Park, Conservation Area, etc., none of which are directly applicable to this site) provide a clear reason for refusing the development. In this case, the technical conflict with the Development Plan created by the site's position outside of the Settlement is not a strong reason for refusal because the Plan is out-of-date as this is outweighed by the site's sustainable location, its residential context and the Council's housing deficit. Redevelopment of the site will also present the opportunity to enhance the setting of the nearby Conservation Area, which will be discussed in greater detail below. The proposal is therefore acceptable in principle, subject to addressing the other site-specific considerations, which will be undertaken in the following paragraphs of this section of the Statement.

Design and Layout

- 4.7. The existing dwellings located on Rixon Gate, Kent End and Ashfield differ in their size, architectural style and materials used in their construction. There is no prevailing architectural character in this part of Ashton Keynes, with dwellings in this part of the village having been constructed in different periods. The pre-application advice requested that the design and layout of the proposed dwellings should have an agricultural appearance to reflect the former agricultural use of the site.
- 4.8. The four dwellings have been designed with traditional Cotswold vernacular style in terms of their roof pitches, proportions, window detailing and building materials, which include a mixture of reconstituted Cotswold stone, timber cladding, and slate roofs. The layout of the development has been designed to replicate a traditional farmstead with the buildings arranged in a courtyard, with main dwellinghouses flanked by subservient garage/storage outbuildings.



- 4.9. The arrangement of Plot 1 replicates the existing corrugated metal building that is positioned along the north-west boundary of the site, adjacent to Rixon Gate. The principal elevation faces south into the courtyard with a south-facing garden enclosed by a low boundary wall and a five-bar gate.
- 4.10. Plot 2 is located to the south of Plot 1, with its principal elevation facing onto the central estate road around which the four dwellings are positioned. This features a principal dwellinghouse with a separate outbuilding in the north-west corner of the plot, with a vehicular access off the main estate road.
- 4.11. Plot 3 is in the eastern corner of the site, facing towards Plot 1 to the north. This is comprised of a two-storey dwelling with a subservient one-and-a-half storey wing with an integral garage at ground floor level with accommodation above, served by a traditional dormer window. Finally, Plot 4 has been designed to appear as the principal farmhouse of the courtyard at the southern end of the site, designed with an 'L' shaped plan form and a rear garden overlooking fields to the south.
- 4.12. The new dwellings would have similarities with the style of the Cotswold stone houses found on Rixon Gate, while being constructed in a holistic manner with a cohesive palette of materials that complements their surroundings. The proportion and detailing of the dwellings are typical of detached properties found in the southern Cotswolds area. The development would draw on the local context and complement the locality, thus complying with the guidance contained in Core Policy 57, which advocates a high standard of design and for development to create a strong sense of place. The proposal also follows the brief set by the Council during pre-application discussions, which requested that the development be designed to acknowledge the former agricultural use of the site.

Impact on the Setting of the Ashton Keynes Conservation Area

- 4.13. The Council's pre-application response did not object to the removal of the redundant farm buildings in place of new residential dwellings, however they had concerns that the introduction of an overly suburban form of development could potentially have a negative impact on the setting of the Ashton Keynes Conservation Area.
- 4.14. The Council did not refer to the Ashton Keynes Conservation Area Appraisal (AKCAA) in their pre-application assessment. This document was published in 1998 and its only mention of the application site is in Chapter 3.12, which is introduced as follows:



"Opposite the junction into Kent End from Happy Lands and Rixon Gate there is a working farm."

- 4.15. This is referring to Guest Farm, which is no longer a working farm and has not been for over 20 years. The most recent use of the site was 'Guest Farm Enterprises' approximately 15 years ago, which comprised dog kennels, rabbit hutches, bird houses and a shop selling pet food. No further mention of the site is made, which is unsurprising considering that it is outside of the Conservation Area.
- 4.16. The AKCAA describes the houses on Kent End and Ashfield in Chapter 3.11, which are the houses within the Conservation Area that are closest to the application site, stating that they are typical post-war or later 20th-century dwellings of no particular architectural merit. The houses of Kent End and Ashfield are described as follows:

Morphology: *"On the north-east side the earliest council housing are incongruously large on bare plots but separate enough to allow views through to countryside beyond. On south-west, later council and private housing similar in scale but denser with much smaller plots."*

Details: *"On both sides incongruous constant eaves heights with little apparent division between dwellings, some gabled dormers, plastic gutters, fascia, soffit/barge boards, boarded and mesh fences."*

- 4.17. The redundant buildings at the application site do not make a positive contribution to the setting of the Conservation Area, the lack of mention in the AKCAA is evidence of this. It is clear from the relevant sections of the AKCAA that the redevelopment of the redundant farm buildings at Guest Farm would not inherently harm the setting of the nearby Conservation Area. This is because the part of the Conservation Area that is closest to the application site comprises post-war and later 20th century dwellings is little historic or architectural significance making, at best, a neutral contribution to the character and appearance of the Conservation Area.
- 4.18. The existing buildings at the site are rusting corrugated metal structures and due to the lack of any activity over the last 15 years they have become dilapidated and they detract from the setting of the nearby Conservation Area. The proposal therefore presents an opportunity to enhance the setting of the Conservation Area with a cohesive residential development to improve the appearance of this part of the village.
- 4.19. Under the section labelled 'Guidance Recommendations' for Rixon Gate, the advice within the AKCAA informing new development states:



"Careful consideration of design and use of natural materials is to be given to any proposals for alterations, extensions, new infill buildings or redevelopment at the north or adjacent to the Thames Path.

- 4.20. The Thames Path is a public footpath located approximately 70m to the east of the site running north-south through the Bradstone Sports Field. Although the site is not adjacent to the Thames Path the site is partially visible from it through the car park of the Sports Field. Importantly, the AKCAA does not state that sites adjacent (or in the vicinity of) the Thames Path should not be developed. Instead, guidance is provided on how infill buildings or redevelopment should be designed, advising the use of natural materials. As set out in the paragraphs above covering design, the proposed dwellings have been designed with natural materials including reconstituted Cotswold stone, slate roofs and timber cladding, which comply with the AKCAA requirement.
- 4.21. The current layout and positioning of the site is self-contained and distinctly separate from the dwellings of Kent End and those adjacent to the Thames Path. When this is considered in conjunction with the use of natural materials and with the proposed agricultural/Cotswold style and layout advocated in the pre-application advice, the result would be a modest enhancement to the setting of the Conservation Area.
- 4.22. Historic maps show (see **APPENDIX**) that the historic core of the village centres around the church and the pub, which is the case for most villages. This should be viewed together with the map on page 40 of the AKCAA, which shows the Conservation Area boundary with a dotted blue line and the listed buildings in red. The positioning of the listed buildings is a key giveaway as to what constitutes the historic core of the village and therefore the parts of the Conservation Area that have the highest level of historic and architectural significance. Note that Kent End, Ashfield and the eastern portion of the village contain no listed buildings. The village has slowly expanded generally in an easterly direction away from its historic core along the axis of High Road, Back Street, Church Walk and Gosditch.
- 4.23. Concluding on the matter of the development's impact on the setting of the Conservation Area, the site is located outside of the Conservation Area and would remain distinctly separate from it due to its self-contained nature and the hard boundary formed by the Rixon Gate road. Despite this site context, the Applicant has worked extensively with the Architect to design a scheme that addresses the concerns raised in the pre-application advice relating to the need to retain an agricultural character and use materials that respect the setting of the Conservation Area. The



proposal meets these requirements and complies with the guidance set out in Core Policies 57 and 58, with the resulting development providing a modest enhancement to the setting of the Conservation Area.

- 4.24. Finally, in the unlikely event that the Council found the development caused harm to the setting of the Conservation Area, the Council would have to define the level of harm, something that was not done in the pre-application response. Considering the site is outside of the Conservation Area, the design qualities of the proposal set out above and its self-contained nature, the harm could only realistically ever be at the lower end of 'less than substantial'.
- 4.25. NPPF paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (in this case, the Ashton Keynes Conservation Area), this harm should be weighed against the public benefits of the proposal. In other words, less than substantial harm does not justify refusal on its own, and it must be balanced against the benefits, such as the provision of housing when the Council is unable to meet its housing requirements.

Biodiversity

- 4.26. A Preliminary Ecological Appraisal (PEA) and Bat Emergence and Re-Entry Survey (BERS) enclosed with the application concludes that with appropriate mitigation, precautionary measures, and Biodiversity Net Gain delivery, the proposed development is unlikely to result in significant ecological constraints. This complies with Core Policy 50, which states that developments shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.
- 4.27. The PEA states that while the site lies within an area mapped as coastal and floodplain grazing marsh, it fails to meet most of the qualifying criteria and is therefore unlikely to constitute a Section 41 Priority Habitat in its current condition. Habitats present on site are generally of low to moderate ecological value, though they provide foraging and commuting opportunities for a range of species.
- 4.28. Several statutory designated sites occur within 2km of the site, notably Cotswold Water Park Site of Special Scientific Interest (SSSI). However, the PEA found that there would be no direct impacts on the SSSI as a result of the proposed development.



- 4.29. Three of the buildings on site (B1, B2 and B3) were assessed as having low potential for roosting bats, while others had negligible value. The BERS states that while there is a risk to bats as a result of the proposed development, this can be mitigated by soft removal of potential roosting features within Buildings B1, B2 and B3 to be conducted under ecological supervision prior to demolition.
- 4.30. The site offers nesting opportunities for common birds, though no active nests were recorded. Vegetation clearance should not be done during the main breeding season, unless supervised by an ecologist. Grassland and scrub habitats provide limited suitability for reptiles and amphibians, therefore precautionary working methods are recommended rather than further surveys. No evidence was found for badger setts, dormice, great crested newts, or riparian mammals, and impacts to these species are considered unlikely.
- 4.31. In terms of Biodiversity Net Gain (BNG), the BNG Assessment states that the site generates 1.54 area-based habitat units, 0.02 linear-based habitat units and 0.40 watercourse-based habitat units in its baseline. In order to achieve a minimum +10% BNG uplift for both, a minimum of 1.69 area-based habitat units, 0.02 linear-based habitat units and 0.44 watercourse-based habitat units are required.
- 4.32. Recommendations for achieving the target include creating wildflower meadows and trees in communal areas (as private gardens cannot contribute to BNG calculations), a vegetated ditch along the southern boundary, and a strip of mixed scrub along the eastern boundary. This will be provided in conjunction with the purchase of off-site credits where necessary, to ensure the required 10% BNG uplift.

Mitigation of Recreational Pressure on an SAC

- 4.33. The application site is within the inner Zone of Influence (ZoI) of the North Meadow Special Area of Conservation (SAC). Wiltshire Council, along with Swindon Borough Council and Cotswold District Council, has adopted a Mitigation Strategy to help protect this internationally important biodiversity site. This involves developers making financial contributions on a per-dwelling basis to help fund the Mitigation Strategy, the aim of which is to generate funds protect these areas from the perceived increase in recreational pressure that new residential developments create.
- 4.34. The SAC Mitigation Strategy states that this money generated will contribute to funding the following initiatives designed to protect the SAC from recreational pressure:



- On-site Strategic Access Management and Monitoring (SAMM).
 - Off-site Suitable Alternative Natural Greenspaces (SANGs).
 - Staff – including on-site wardens.
 - Education and awareness – including information packs for new residents and social media/online campaigning.
 - Infrastructure – including the provision of temporary boardwalks in muddy areas, temporary signage and dog waste bins.
 - Monitoring – visitor surveys and habitat impact studies.
- 4.35. Sites within a 4.2km radius of the SAC are within the inner ZoI, with the application site being located approximately 1km from the SAC at its nearest point. The SAC Mitigation Financial Contribution for residential developments of 50 dwellings or fewer is £812 per dwelling. Therefore, for a 4-unit development, the fee payable would be £3,248 + the Council's £125 administration fee = a total of £3,373.
- 4.36. Once this application is validated by the Council, the Applicant will commit to paying this amount by signing a Section 111 Agreement. This will ensure that the Applicant is legally required to pay the £3,373 prior to the commencement of development, thus successfully mitigating against the recreational pressure that the residential development may cause to the SAC.

Arboriculture

- 4.37. The Tree Survey was completed using ground-based visual assessment. A total of four individual trees and nine groups of trees were surveyed, including off-site boundary trees within the influencing distance of the site. Numerous smaller shrubs and trees were present, but did not meet the minimum diameter thresholds required for inclusion. Each tree or group was assessed for species, size, age class, physiological and structural condition, and overall quality, and then categorised in accordance with the BS5837 cascade chart as Category A (high quality), B (moderate quality), C (low quality), or U (unsuitable for retention).
- 4.38. The results show a mix of tree quality across the site. Several boundary groups and individual trees were assessed as Category B or C, indicating moderate to low quality with remaining life expectancies of 10 to 40 years. A small number of trees and groups were categorised as U due to poor condition, decline, historic damage or management



practices such as topping, meaning they are unsuitable for long-term retention. No assessment of statutory protection, such as Tree Preservation Orders (TPOs), was undertaken, as BS5837 assessments are independent of such designations.

- 4.39. The Survey includes a detailed Schedule of Trees and a Tree Constraints Plan illustrating Root Protection Areas (RPAs) for all retained Category A, B and C trees. The RPAs identify minimum areas that should remain undisturbed during development to ensure that it can proceed without undue harm to healthier trees.
- 4.40. The Survey recommends that further arboricultural documentation should be prepared, including an Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan, to ensure retained trees are adequately protected during construction. However, these can be conditioned and do not have to be provided at this stage.

Flood Risk and Drainage

- 4.41. A Flood Risk Assessment (FRA) has been prepared by K-Ten Consulting to support the proposed development. The site comprises former agricultural land adjacent to a minor tributary of the River Thames, with a largely flat topography between 83.3 and 83.7m Above Ordnance Datum (AOD) and permeable superficial deposits supporting infiltration. Environment Agency mapping confirms that the majority of the site lies within Flood Zone 1, with only small marginal areas along the north-eastern and southern boundaries intersecting Flood Zones 2 and 3.
- 4.42. Modelled EA flood data (River Thames: MRL to St Johns, 2014, updated 2017) demonstrates that the developable footprint sits above predicted flood levels, including the 1% Annual Exceedance Probability (AEP) plus 70% climate change scenario. The proposed Finished Floor Level (FFL) of 83.49m AOD provides a 300mm freeboard above the worst-case design flood level. Consequently, fluvial flood risk to the development is low, and safe access/egress is achievable via Rixon Gate.
- 4.43. Core Strategy Policy 67 requires that where development is proposed within Flood Zones 2 or 3, the Sequential Test must be informed by the Strategic Flood Risk Assessment (SFRA) and the Strategic Housing Land Availability Assessment (SHLAA). In this case, although the wider site boundary marginally touches Zones 2 and 3, all built development is intentionally located within Flood Zone 1. Therefore, the Sequential Test is satisfied on-site: the most vulnerable elements are directed to the



area of lowest flood risk, in accordance with Policy 67 and guidance within the NPPF and PPG.

- 4.44. Surface water flood risk, groundwater risk, sewer flooding risk, and artificial sources are all assessed as low, with permeable paving and infiltration forming the preferred Sustainable Drainage Strategy (SuDS) strategy, or attenuated discharge to the adjacent river if required. The FRA confirms that the development will remain safe for its lifetime without increasing flood risk elsewhere.

Highway Safety and Parking

- 4.45. The application is accompanied by a Highways & Transport Technical Note written by The Transport Consultancy, which sets out that the development is acceptable. This is because it incorporates sufficient car and bicycle parking facilities in accordance with the Local Plan and the Local Transport Plan Cycling Strategy. The proposed vehicular access will achieve a junction geometry that is sufficient to ensure safe visibility for residents exiting the site. The total number of daily vehicle movements is likely to be in single figures, which would have a negligible impact on the capacity of the local highway network.
- 4.46. The proposed development also includes the provision of a new vehicular access to the semi-detached property adjacent to the site. This is to ensure the neighbouring property will benefit from its own vehicular access and not have to access their property through the application site. The owner of this property currently parks their car within the application site on an informal basis, but this option would no longer be available to them once the development is commenced. The Applicant would be satisfied with a planning condition ensuring delivery of the neighbour's new access prior to the commencement of development.

Effect on Living Conditions of Neighbouring Residents

- 4.47. The only neighbouring property that would be potentially affected by the proposal is the former Guest Farm house, to which the buildings located on the site were ancillary when the farm was operational. The dwelling borders the site to the south-west and there would be approximately 20m between it and the nearest dwelling at Plot 2. This would be a side-to-rear relationship. The dwelling at Plot 4 would be closer to the neighbouring dwelling, but only the corner of a rear projecting wing at a 45-degree angle.



- 4.48. The layout of the proposed dwellings has been designed to ensure the living conditions of those living in the neighbouring dwelling in terms of privacy loss, light restriction and overbearing will not be harmed. A new vehicular access would be constructed for the neighbouring property, as set out in the preceding subsection above.



5.0 Conclusion

- 5.1. The purpose of this Planning Statement is to set out the reasons why full planning permission should be granted for 4 no. dwellings at the site. Section 1 of the Statement sets out the proposed development, Section 2 sets out the site context and planning history, and Section 3 sets out the local and national planning policies that are relevant to the proposal.
- 5.2. Section 4 of the Statement sets out the main planning considerations that the Council will need to assess before making its decision. The principle of development was found to be acceptable despite being located outside the settlement boundary for Ashton Keynes. This is because of the proximity of the site to the services and amenities in the village and the Council's 5YHLS shortfall triggering the presumption in favour of sustainable development.
- 5.3. The design and layout of the proposal was found to be consistent with other neighbouring residential dwellings. The design and layout follows the pre-application advice, which requested that the development incorporate an agricultural aesthetic due to the site's former use as farm buildings. This results in a development that will enhance the setting of the nearby Conservation Area.
- 5.4. Subject to precautionary methods and mitigation, the Statement sets out that the development can be carried out without harming protected species or their habitats. A 10% BNG uplift can be achieved through a combination of on-site measures and the purchase of off-site credits. The perceived recreational pressure on the North Meadows SAC will be mitigated by financial contributions towards the Council's adopted SAC Mitigation Strategy.
- 5.5. The Arboricultural Survey recommends that further arboricultural documentation should be prepared to ensure retained trees are adequately protected during construction. Ultimately, the development can be carried out without compromising the healthy trees on site that are worthy of retention. The Flood Risk Assessment and Drainage Strategy sets out the flood mitigation measures and surface/foul water drainage infrastructure that is compliant with the relevant policies and guidance.
- 5.6. Finally, the Statement sets out that the development would provide adequate parking spaces on site and that traffic movements to and from the site would not result in a highway safety issue, with the visibility splay for the new intersection with Rixon Gate



having been demonstrated. The living conditions of the occupants of the only neighbouring property would not be harmed.

- 5.7. A comprehensive assessment of all the relevant planning considerations has been undertaken in this Statement. The result is a proposed development for 4 dwellings that can be approved, having regard for the Development Plan and NPPF. The Applicant has worked extensively with the Architect and McLoughlin Planning to ensure the requests of the Council that were set out in its pre-application advice have been followed to create a development that can be supported by the Council.



6.0 Appendix: Historic Map of Ashton Keynes & Pre-application Advice

1898 Ordnance Survey – Source: www.oldmapsonline.org



Joe Seymour
De La Bere House
Bayshill Road
Cheltenham
GL50 3AW

Development Services
Wiltshire Council
Tel: 0300 456 0114
developmentmanagement@wiltshire.gov.uk

22 May 2025

Application No:	ENQ/2025/00451
Application Type	Pre-application Enquiries
Proposal:	Demolition of redundant farm buildings and construction of 4 no. dwellings.
Location:	GUEST FARM, RIXON GATE, ASHTON KEYNES, SWINDON, SN6 6PH
Case Officer:	David Millinship

Dear Sir/Madam

I refer to your pre-application enquiry which was lodged/registered on 19 March 2025.

In response to your enquiry I hope you find the following information helpful.

Please note that this advice represents an officers' informal opinion based upon the information you have provided. It is given without prejudice to any decision the Council may make on any subsequent formal planning application. In particular, a planning application will be the subject of publicity and consultation in accordance with the Council's procedures which may bring to light additional issues, and as you will be aware, advice offered is based on the planning policies that apply at the time of writing.

Site description and constraints

The application site comprises a farmyard located close to, but not within the limits of development (LoD) of the 'large village' of Ashton Keynes¹ that extends to the north-west. As such, for planning purposes the site is within open countryside. The Village Conservation Area (VCO) also skirts the north-western intervening boundary of the site (shared with the public highway at Rixon Gate). The Farmyard (Guest Farm) is thought to have been first constructed in the first quarter of the 20th Century but the land would have been farmed in conjunction with the earlier farmsteads (Rixon Gate and Kent End Farm and settlement back to the 1700s and earlier.

Bradstone Playing Fields extend to the north-east (on the opposite side of the River Isis), grassland/pasture (thought to have been previously associated with Guest Farm) extends beyond the south-eastern site boundary. A public footpath (numbered: AKEY22) bisects the site linking the village to the open countryside to the south-east. A single dwelling is located to the west (the council's records hold the address as 'The Annex' at Guest Farm but it appears to now be occupied independently).

A small section of the site, north-eastern area, is in Flood Zone 2 as the River Isis (a tributary of the Thames) runs adjacent to the north-eastern boundary, but the majority of the site is in Flood Zone 1,

¹ As defined by Core Policy 13 (Malmesbury Community Area) of the Wiltshire Core Strategy.

the lowest-risk river flooding category with no notable risk of surface water flooding on site or to adjacent land.

The site is within the Zone of Influence for the North Meadow and Clattinger Farm Special Area of Conservation (SAC) and is within the impact zone of the Cotswold Water Park Site of Special Scientific Interest (SSSI). The SSSI boundary is located approximately 100 metres to the north, extending also to the south-west.

The site itself includes a farmyard, farmhouse and annex. The farm buildings appear to be within a poor state of repair.

Development Proposal

The pre-application is seeking the local planning authority's (LPA) advice on a development comprising the demolition of the existing farm buildings and construction of four detached dwellings, including creation of a new site access and associated, parking, manoeuvring areas, detached garages and outdoor amenity spaces (gardens).

Planning History

Application Reference	Description of Development	Decision
N/82/00935/F	Extension to dwelling for self-contained accommodation	Approved with Conditions (14/12/1982)

PLANNING POLICY

DEVELOPMENT PLAN COMPLIANCE HERE

Wiltshire Core Strategy – Adopted 2015

Core Policy 1 – Settlement strategy;
Core Policy 2 – Delivery strategy;
Core Policy 13 – Malmesbury Community Area;
Core Policy 41 – Sustainable Construction and Low Carbon Energy;
Core Policy 45 – Housing Needs;
Core Policy 48 – Supporting Rural Life;
Core Policy 50 – Biodiversity & geodiversity;
Core Policy 51 – Landscape;
Core Policy 55 – Air Quality;
Core Policy 56 – Contaminated land;
Core Policy 57 – Ensuring high-quality design and place shaping;
Core Policy 58 – Ensuring the conservation of the historic environment;
Core Policy 60 – Sustainable Transport;
Core Policy 61 – Transport and Development;
Core Policy 62 – Development impacts on the transport network;
Core Policy 64 – Demand Management;
Core Policy 67 – Flood Risk.

Policy HSP3 – Additional Housing Developments;
Policy HSP4 – Mix of housing types and tenure;
Policy HSP6 – Housing for Older People;
Policy INP1 – Flood risk mitigation in new developments;
Policy INP2 – Road and Pedestrian Safety;
Policy ENP1 – Protection of biodiversity and wildlife sites;
Policy ENP2 – Environmental infrastructure and accessibility;
Policy ENP3 – Enhancing the landscape character of the Parish and retaining the character of the village including the tranquillity of its setting;
Policy HCP1 – Local character.

Supplementary Design Guidance

- The Wiltshire Design Guide (adopted by the council April 2024);
- Ashton Keynes Conservation Area Statement (June 2016 – supporting document of the AKNP);
- Conservation Principles (Historic England – 2015);
- Conservation Area Appraisal, Designation and Management – Historic England Advice Note 1 (Second Edition – February 2019);
- The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning: 3 (2nd Edition – December 2017).

CONSULTATIONS

Consultation responses have been summarised below. Full responses will be issued alongside this response.

Conservation (Wiltshire Council) – No comment

The development does not lie within the consultation remit and conservation do not intend to comment.

Drainage Consultant – No objection in principle

The development will be required to be supported by a Flood Risk Assessment that includes a holistic assessment of all sources of flooding and the risks posed to the development as well as ensuring that no increased risk of flooding to adjacent land would occur. A drainage strategy should be included along with reference to the EA's and the council's guidance. Sequential Test considerations are a planning matter for the LPA to determine.

Highways Development Management (Wiltshire Council) – No objection subject to design amendments and s.278 agreement (highways act).

Rights of Way (Wiltshire Council) – No objection providing the footpath is retained

The footpath should be retained and incorporated into the design. Design advice is given within the full response.

ASSESSMENT

Housing Land Supply

The National Planning Policy Framework was revised in December 2024. This has reintroduced the requirement to meet five years' worth of deliverable sites and a buffer to be applied to the five-year housing requirement in all circumstances, and has revised the Local Housing Need calculation to establish the five-year housing requirement. These factors have resulted in a substantial increase in the five-year housing requirement to be met from the previous calculation. When this is assessed against the housing land supply which can be delivered within five years, the recalculation shows a significant reduction in the number of years supply. The resulting position shows that the Council can currently demonstrate a 2.03 years housing land supply of housing at a unitary authority level. This is considered to be a substantial shortfall.

The absence of a five-year housing land supply is a material consideration in the determination of this application. In accordance with Paragraphs 78 and 11(d) of the National Planning Policy Framework (NPPF), for applications involving the provision of housing, where there is a shortfall in the supply of deliverable housing sites, the most important policies for determining the application should be considered out of date. The current housing land supply shortfall is a factor that must be considered in the planning balance and in this case, as a five-year housing land supply cannot be demonstrated, the weight that can be applied to the most important policies for determining this application should be assessed and altered in the light of the shortage in housing land supply. The proposal must be assessed against the national policy context of the need to boost housing supply and the benefits of delivering new homes whilst having particular regard to the key policies set out in paragraph 11(d) and the relevant Footnotes of the NPPF.

Principle of development

When considering planning applications for new dwellings, one of the key issues to assess is the location of the proposed development in relation to the established limits of development. The limits of development define the boundary between the built-up area of a settlement and the surrounding countryside and are set in place to ensure sustainable growth, efficient use of land and resources, and to ensure that new housing is located near existing services, infrastructure, and transport links.

The site is located within open countryside and is not allocated for any future development. Within open countryside, new housing is generally restricted to rural exceptions or conversion of existing buildings. Whilst there are existing buildings at the site, the proposal does not involve any conversions and appears to be a scheme to replace farm buildings with open market housing (with no rural exceptions sought). The site is also not considered to be within the definition of 'previously development land' (brownfield land) (PDL) that both the NPPF and WCS seek to prioritise for redevelopment over agricultural sites.

This is contrary to the spatial development and new housing policies of the WCS (core Policies 1 and 2) and AKNP (Policy HSP3) and is considered to be harmful to the adopted development strategy for the area and a matter that is given negative weight in the overall balance.

However, as you have stated within the submitted Pre-Application Statement (PAS) that the council is unable to demonstrate a 5yrHLS so its housing delivery policies can be considered to be out-of-date. The LPA also agrees with your assessment of the AKNP also being out of date with para. 14 of the NPPF not being engaged.

NPPF para. 11d is engaged and, should it be considered that no strong reasons for refusing the development, due to adverse impacts on protected areas or assets of particular importance, would arise (para. 11d(i) and Footnote 7) and that any adverse impacts would significantly and demonstrably

outweigh the benefits (should the permission be granted) it is possible the LPA could support a redevelopment of the site in some form.

The site is not considered to be an unsuitable location for a small residential development. Future occupiers would have good access to local services within the village and it is noted that the village settlement boundary (as defined by Map-AK1 within the AKNP) skirts the site on two sides, with the recreation ground extending along the north-eastern boundary. As such, the negative weight given to the conflict with Core Policies 1 and 2 of the WCS and HSP3 of the AKNP can be somewhat tempered by the site location.

In rural areas NPPF para. 82 advises that decisions should be responsive to local circumstances and support housing developments that reflect local needs. Para. 83 goes on to state that:

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

The AKNP is a good starting point when considering local needs as it forms part of the development plan and was drafted to aid with the delivery of the strategic needs set out within the WCS but at a local level. The AKNP identified a need for 11 new homes to be built by 2026 with a emphasis on the need to secure more smaller homes and dedicated affordable and accessible housing. A site for a development of 11 homes was allocated by the AKNP elsewhere in the village (and has now been mostly built out).

So the development of Guest Farm would be a windfall development which the NPPF encourages LPAs to support “*through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes*”. The site is not within the settlement boundary and is not PDL (as confirmed above) but is not necessarily in an unsuitable location so has some potential to be supported if it can be considered the development would meet local needs (contrary to the NPPF, WCS Core Policy 45 and AKNP Policy HSP4).

The site is unlikely to be large enough to be able to support dedicated affordable units, but could meet some of the need for smaller one, two and three bedroom homes and/or accessible units. Greater positive weight would be given to a housing mix that meets local needs. The current housing mix proposed would not be given positive weight.

However, the starting point remains the development plan that does not support an open market housing development in this location. The scheme would be contrary to the development plan but, if public benefits can be reasonably expected to be generated to a scale that outweighs the harm (to the development strategy for the area) the LPA could be in a position to support a future development. This requires considerations of all matters before a conclusion can be made.

The first and most pertinent considerations relate to the possible presence of strong reasons to refuse any future application due to impacts of the development on protected areas or assets of particular importance (as defined by NPPF Footnote 7). Relevant to this site location, there is potential for the development to cause adverse impacts on a heritage asset (by impacting on the setting of the Village Conservation Area) and possible impacts on the North Meadow SAC and the Cotswold Water Park SSSI.

Natural Environment (impact on protected habitat, biodiversity value of the site and flood risk)

On-site habitat and protected species considerations

The site is mostly occupied by buildings, but has a small area of orchard tree planting that (although a small area) could be considered to possess a high habitat value with the possibility that individual trees could be considered to be 'veteran trees'. There are also several mature trees within the woodland strip that skirts the site along the River Isis, wrapping around to the rear field boundary and along the site frontage shared with the public highway.

A tree survey must be undertaken prior to any works (including site clearance) to assess the quality and potential impacts of the development on trees within the site and within 15 metres of any development. The survey must be prepared by a suitably qualified person and follow the guidance of BS5837:2012 (Trees in Relation to Design). The tree survey will help to inform the site layout as any works that could harm, or result in the removal of high quality or veteran trees will not be permitted.

In the case of the current proposal the new site access will impact upon trees (removed to create it and associated visibility splays) but the quality of these trees and level of impact that may be caused to the other nearby trees that skirt the river is unclear.

With regard to the buildings, they are considered to be in a location with high potential for bats and other protected species to be present. Many of the building also appear to be accessible to a number of species. A detailed protected species survey would be expected to be undertaken to inform any future development proposal and should include details of any mitigation, compensatory and enhancement measures (i.e. bat and bird boxes, compensatory planting).

It is of note that the removal of existing trees will increase the amount of Biodiversity Net Gain (BNG) required to be secured under the statutory condition. It is possible that a scheme that is exempt from providing BNG could be secured as the site has large areas covered by buildings or impermeable surfaces. Should the natural areas (the small orchard, vegetated boundaries) be retained, it appears possible that a *deminimis* exemption could be accepted. However, this could not be achieved under the currently proposed site layout, that would be subject to the statutory BNG condition and need to provide 10% net gain over and above that of the existing site value.

Impact on protected habitats

The site is within the impact zone of the Cotswold Water Park SSSI. However, the scale and nature of the proposal is unlikely to give rise to any adverse impacts, subject to a suitable scheme of foul and surface water drainage disposal with measures to ensure water quality is improved before being discharged. Indicative details of the drainage scheme should be included with any future planning application to at least demonstrate that a viable scheme, that would not increase the risk of flooding to the adjacent river or other land downstream, can be implemented. Full details of the system design would be likely to be secured by condition in order to ensure no adverse impact to with flood risk or water quality matters.

The site is also within the Zone of Influence of the North Meadow SAC. As a residential development it is of a scale and type that could impact adversely on the integrity of the SAC. To ensure mitigation against development with potential to impact on the SAC can be secured Wiltshire Council (along with neighbouring authorities and Natural England) prepared the North Meadows Recreational Mitigation Strategy and to approve the use of agreements under s.111 of the Local Government Act 1972, as well as agreements and unilateral undertakings under section 106 of the Town and Country Planning Act 1990, to secure developer contributions for this mitigation strategy.

The Section 111 approach is an alternative option to pay the financial contributions and can be used by applicants who would not otherwise have a legal agreement. Applicants can also progress bespoke mitigation measures as an alternative approach to this strategy. In this case, payment towards the mitigation strategy, to be secured by s.111 would be the most appropriate option. This payment would need to be made prior to a decision being able to be made on any future planning application (providing a future case officer was satisfied that no other reasons for refusal may exist an invoice can be sent at an appropriate time).

Overall, providing future survey work does not identify any significant on-site impacts that cannot be mitigated against, it is considered there would be no strong reason to refuse a future planning application due to impacts on protected or priority habitat.

Flood Risk

A site-specific Flood Risk Assessment (FRA) is required for this application. The site-specific FRA should demonstrate that the site is not adversely affected by flood risk from different sources, and how the flood risk from all sources will be managed without increasing flood risk to the development itself or elsewhere and to ensure water quality is improved (see above). It should also outline the proposed drainage strategy for the site.

The applicant is referred to the Environment Agency's Standing Advice on how to prepare an FRA, as well as their standing advice for vulnerable developments. The applicant should also review all published Section 19 reports on historic flooding within Wiltshire and incorporate these into their holistic assessment of flood risk, and historic flood events. These reports can be found on the council website here <https://www.wiltshire.gov.uk/article/10592/Overview> .

Given the small area of the site that would appear to be at risk of flooding from the adjacent river (that within FZ2), the LPA does not consider a Sequential Test would be required to be undertaken, providing this is suitably justified in any future FRA with reference to the EA's and council's advice. To make the case against the need for a sequential test more viable development (including access, hard-surfaced manoeuvring spaces) should be removed from the FZ2 area.

It should be noted that the EA have updated their flood maps for planning in March 2025 and these must be used as part of the Flood Risk Assessment of the site.

If it considered that subject to a suitable site layout and drainage design, there is a reasonable likelihood that the site can be made free of flooding and suitable for its intended use.

Contamination

The council holds little records in relation to past uses of the site that could have caused contamination. However, given the relatively strict approach adopted by the NPPF, any future planning application should include some level of historic use assessment to inform the need for further site investigations. If there appears to be evidence of possible contamination, then a desktop assessment and possibly a site investigation should be undertaken.

The council's Public Protection team only offer general standing advice in relation to pre-application enquires but any future application would involve a formal consultation with them, so even a basic level of information about possible contamination would be useful.

Design, including impacts on the conservation area

In considering the design of a proposed development, the local planning authority must ensure that the proposal aligns with the principles set out in the Wiltshire Core Strategy. Core Policy 57: Ensuring High Quality Design emphasises that all new developments, including extensions and changes of use, must

demonstrate a high standard of design that enhances the local character of Wiltshire. Proposals should respond positively to the natural, historic, and built environment, ensuring the retention of important features such as trees and hedges, and integrating effectively into the local setting. Sustainable construction, energy efficiency, and compatibility with surrounding uses are essential.

Design, layout and landscape considerations

Firstly, the site layout is not considered to be acceptable. The use of detached buildings all with detached garages is not an effective use of the site. In this case there is an existing farmyard that has a group of buildings that are low in height and simple in form and detailing. The current proposal would introduce a much more suburban character which I consider would be harmful to the existing street scene and VCO (see below). The loss of a section of the vegetated front boundary, adjacent to the River and entrance to the recreation grounds would also be unacceptable in visual impact terms. The existing site access would be able to be widened without natural features of the site being lost and this should be the main site access. A small pedestrian access nearer to the recreation ground maybe acceptable, possibly incorporating a realigned public footpath (see highways section). However, addition pedestrian access to the site would not be considered to be necessary as the existing opening could be widened to include a footway as well as a road of sufficient width.

In wider landscape terms, the taller replacement buildings would be more visible but within longer distance views of the site they would be seen within the context of the existing built form of the village (albeit as an extension to that built form). The use of materials to reflect the historic dwellings (within the VCO) would help to reduce the visual impact in long distance views, but views from the nearby footpaths and recreation ground

Conservation Area considerations

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act. 1990 (as amended) provides a duty to LPAs when exercising their functions, with respect to any buildings or other land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

More broadly, para. 221 of the NPPF advises that:

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

As a farmyard, the existing site possesses a rural character that reflects the boundary between the open countryside and the village (including the VCA). In broad terms, there is no in principle objection to the loss of the farm buildings but the introduction of an overly suburban form of development would be considered to be harmful to the setting of the VCA resulting in a loss of its significance.

Whilst the indicative design of the dwellings suggests they could be constructed to a high-quality, I have concerns over how the new dwellings would be perceived in relation to the existing domestic buildings within the VCO that extend to the north-west. The Design Statement (DS) confirms that several existing houses within the VCO have been used for design inspiration. However, this could result in a pastiche approach that fails to acknowledge the open countryside location of the site and its historic use as a farmyard. The extension of an obviously residential type of built form (over this rural site) would be harmful to the character of the rural village and the VCO.

However, an alternative design approach could be to take inspiration from traditional farm buildings, that generally have simpler forms and incorporate lighter-weight natural materials. Such a design approach can sometimes be quite contrived, but in this case I consider a better approach would be to

respect the rural character of the site in order to maintain a visual separation between the built-up area of the VCO and the existing site that remains within open countryside. This may also present opportunities for the site layout to be revised and for smaller units to be provided (more suited to meet identified local needs and therefore provide greater public benefits). Hypothetically, the LPA could support a development of 5-6 units if the mix was considered to be closer to the smaller units required to meet local needs and the design was less impactful (retaining a broadly rural character).

It is currently considered the proposed site layout and building design would be harmful to the VCO and public benefits would not be sufficient to outweigh this harm. Given that the NPPF affords 'great weight' to the conservation of a heritage asset, it is likely that a future application for this scheme could be refused under the advice of NPPF para. 11d(i) due to the harm to the heritage asset presenting a strong reason for refusal.

Transport and Highways

Firstly, the site is not considered to be within an unsuitable location for a small-scale residential development. Although outside of the village settlement boundary future occupiers would be able to secure safe access to village services by a range of transport modes (most likely cycling and walking). No conflict with the aims of Core Policies 60 and 61. Similarly, management during the construction phase could be secured by a suitable worded condition so compliance with the aims of Core Policy 62 is likely achievable.

It is questionable whether sufficient visibility can be achieved for the proposed new access. It would enter the public highway at a point that appears to be restricted by vegetation that may not be within the applicant's control and would be located close to a pedestrian link from the public highway into the well-used recreation ground. Whether sufficient visibility along the vehicular highway to the north-east can be achieved and maintained is also questionable.

The Local Highway Authority (LHA) have reviewed the proposal and appear to be offering no in principle objection. However, they appear to be accepting that the site has more than one existing vehicular access which does not appear to be the case. A dropped kerb near to the northern point of the site appears to be associated with the pedestrian access into the Rec. grounds rather than the proposed development site. Creating a new access at this point would be problematic as suggested above.

Widening of the existing access would be the preferred option (also in visual terms) as the road is relatively straight and the access would be set away from the recreation ground access where pedestrian movements would be more frequent. The existing access is also relative free of existing vegetation (with any existing appearing to be within the site rather than third-party land) so achieving and maintained visibility splays appears much more feasible.

The creation of a new footway within the public highway along part of the site frontage appears feasible subject to a s.278 agreement between the Applicant and LHA.

The current layout appears to be able to provide sufficient off-road parking and vehicle manoeuvring areas, but the LHA note that currently only two spaces per unit would be insufficient as the garage spaces would not be considered as parking provision in the current design. Bin storage and collection arrangements and secure cycle storage may need to be considered but a solution would appear reasonably able to be designed into the scheme. The use of detached double garages (as well as being an inefficient use of the land) is not strictly necessary in terms of parking provision and it should be considered whether these are necessary, or the land could be better used for amenity space or landscaping. Smaller cycle storage or garden stores could provide secure storage (less visually impactful) in lieu of garages. EV charging for at least one parking space per unit should be shown on any future planning application.

Economic benefits

Para. 85 of the NPPF states that “*Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*”. The proposal presents an opportunity for development with some expectation that economic benefits would be created during the construction phase (but only short-term) and post occupation (payment of council tax, increased support to local businesses). However, due to the small-scale of the development these benefits can only be given limited positive weight in the overall balance.

Other matters

I consider the redevelopment of this site could be of high local interest as it is visible within the street scene, located on the public footpath network and adjacent to the village recreation ground. As such, some form of early engagement with the Parish Council (if not with other local residents) is advised to take place.

The above assessment identifies that the scheme is unlikely to be supported by the policies of the AKNP but, the PC may be able to offer some advice with regards to the local needs of the village (at this particular point in time). Whilst the PC may not support a future development scheme it is likely to be beneficial to secure their views and attempt to address them prior to any formal planning application submission.

SUMMARY

The current proposal is not considered to be a development likely to receive a positive officer recommendation should a formal application for the current scheme be submitted. Harm to the Village Conservation Area (VCO) has been identified as well as harm to the landscape setting of the village due to a suburban extension of the village into open countryside. The harm to the VCO could be a strong reason for refusal in and of itself, as well as being considered cumulatively along with the other identified policy conflicts and adverse impacts.

Further detailed surveys of the ecology value of the site and quality of existing trees are required before firm conclusions can be drawn on any harm that would arise as a result of the loss of the existing buildings and loss of/damage to certain trees.

The proposed housing mix and layout would not be considered to be an effective use of the land that would meet local needs.

However, as the site is closely associated with the village (the settlement boundary and recreation ground skirt it on three sides), future occupiers would have a good level of access to local services. The location is therefore considered to be suitable for a small residential development providing public benefits can be demonstrated to outweigh any identified harm.

It is suggested that a redesign to include smaller units (potentially of a higher number to meet local needs) designed to be more reflective of the simple farm buildings that currently occupy the site, could be considered more favourably in the overall balance.

Validation requirements for a future submission

In addition to the standard requirements for an application of this type, any future planning application for this (or a similar) residential redevelopment should include:

- A Flood Risk Assessment;
- A Preliminary Ecological Survey (if presence of bats or other protected species then further surveys may need to be undertaken prior to determination);

- Full details of existing and new accesses including visibility splays (with certificate B of the app forms signed and notices issued if vis-splays will cross third-party land);
- A basic assessment of historic land uses to identify possible contamination and if likely, a desk based risk assessment should be submitted;
- Some basic justification for the demolition of the buildings versus retention and conversion (if they are proposed to be demolished);
- Justification for the housing mix of any future proposal, with reference to local housing needs assessments;
- A heritage statement to assessment the significance of the Conservation Area in the vicinity of the site and how it can be preserved.

This is not a complete list and additional documents may be requested depending on the time of submission and nature of future proposal.

Yours faithfully

Head of Development Management

Officer's Name: David Millinship
Senior Planning Officer
0300 456 0114
david.millinship@wiltshire.gov.uk



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