

PLANNING STATEMENT ADDENDUM

**PERMISSION IN PRINCIPLE FOR THE
PROPOSED ERECTION OF UP TO SIX
DWELLINGS (ONE SELF-BUILD)**

**LAND AT WAYSIDE, 12 CHITTOE HEATH,
BROMHAM, WILTSHIRE, SN15 2EH**

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1.0 INTRODUCTION

- 1.1 LPC (Trull) Ltd submitted a Permission in Principle (PiP) application, on behalf of Mr and Mrs Seed, on the 07 August 2026 for the erection of up to six detached dwellings on previously developed land at Wayside, 12 Chittoe Heath, Bromham, Wiltshire, SN15 2EH.
- 1.2 The PiP application was supported by a Planning Statement, dated 06 August 2026, which provided a description of the site and proposed development, an overview of the planning policy context, and an assessment of the key material planning considerations, demonstrating the proposal's acceptability within the context of the national 'presumption in favour of sustainable development' as set out within the December 2024 National Planning Policy Framework (NPPF).
- 1.3 The Government published a new NPPF on the 17 August 2026 which is a key material planning consideration and of critical importance to the assessment of the PiP application. The wholly restructured NPPF sets out new clear and rules-based national policies for both plan-making and for making decisions on development proposal and how these are expected to be applied.
- 1.4 The purpose of this Addendum to the Planning Statement is to provide an overview of the new NPPF and an assessment of its impact on the consideration of the development proposed within the PiP application. The new NPPF came into force on the day it was published and of significant importance to the PiP application are the new national decision-making policies in relation to achieving sustainable development. They indicate the development the subject of this PiP application is now acceptable in principle under the new NPPF.

2.0 NATIONAL PLANNING POLICY FRAMEWORK 2026

- 2.1 The Government's overview of the NPPF explained that "under the leadership of the new Prime Minister, it is more focused than ever on building the homes our country needs and delivering good growth in every postcode". The Government is committed to tackling the acute and entrenched housing crisis in England, including by means of a bold overhaul of the planning system.
- 2.2 The new NPPF is a key part of wider planning reforms (being delivered via the Planning and Infrastructure Act 2025) which aim to accelerate development and tackle the housing crisis. The new NPPF sets out national planning policy in a clearer and more comprehensive manner and incorporates a number of substantive reforms designed to boost housing supply and unlock economic growth.
- 2.3 The Government explains that the new decision-making policies in the NPPF, which have been separated from those relating to plan-making, will:
 - a. make development management more certain, consistent and streamlined
 - b. standardise policies that apply across the whole of England
 - c. reduce duplication and avoid unjustified local deviation from national policy in local plans
- 2.4 The NPPF continues to highlight that planning law (Section 38(6) of the Planning and Compulsory Purchase Act 2004) requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. However, the national decision-making policies in the NPPF are a material consideration of "**critical importance**" for plan making and for decision taking (Paragraphs 1 - 3).
- 2.5 Some of the national decision-making policies now indicate how much weight "the government would expect a particular consideration to be given, including cases where it is appropriate to give substantial weight to certain benefits, and the limited circumstances in which it is expected that permission would be refused" (Paragraph 7).

- 2.6 The former presumption in favour of sustainable development (the “tilted balance”) now has a different weighting more in favour of development. The former stated that planning permission should be granted unless “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits” (Paragraph 11.d.ii of the 2024 NPPF), whereas the new NPPF says development should be approved “unless the benefits of doing so would be **substantially outweighed** by any adverse effects”. The new presumption is much more tilted in favour of sustainable development. The Government has described the new presumption as a “default yes” policy, and there needs to adverse effects to substantially outweigh the benefits.
- 2.7 The Government explained that to ensure that the decision-making policies in the NPPF have an immediate impact, they come into effect from the day of its publication. There are no transitional periods or arrangements (other than for plan-making), the Implementation section of new NPPF at Annex A clearly states that development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in NPPF should be given **very limited weight**.
- 2.8 The critical importance of the NPPF as a material planning consideration will in certain circumstances overrule the primacy of the Local Plan. The NPPF clearly advises that Local Plan policies which are materially inconsistent with national decision-making policies in the NPPF should be given very limited weight. This applies in Wiltshire because its Settlement Strategy (Core Policies 1 – 3), as explained within the original Planning Statement, is materially inconsistent with national decision-making policies (Policies S3 – S5). It is clear that preference has to be given, or the starting point, is the new NPPF in this instance and then only very limited weight is given to the relevant out-of-date / materially inconsistent policies of the Local Plan. This implication of this significant shift in national planning policy on the PiP the subject of this application is outlined within the following section.

3.0 PLANNING ASSESSMENT

- 3.1 The original Planning Statement explained that the proposed development benefited from the national ‘presumption of sustainable development’ (Paragraph 11.d.ii of the former 2024 NPPF) due to the Council’s current 2.8 years housing land supply position and status of the adopted Local Plan; the Wiltshire Core Strategy (WCS). The national policy advised that permission should be granted for residential development schemes unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 3.2 The proposed development would make efficient use of previously developed land and deliver both social and economic benefits, and there would be no planning harms, apart from the speculative nature of the application thus not aligning with the plan-led approach as outlined within the WCS. However, due to the age of the Local Plan and the Council’s substantial housing land supply shortfall the Planning Statement demonstrated that the weight to be given to the harm is limited, and explained why significant weight should be placed on the moderate to substantial benefits of the proposed development and therefore any adverse impacts of granting permission would not significantly and demonstrably outweigh the benefits.
- 3.3 The assessment remain relevant but the development is now acceptable in principle because the new NPPF introduces a permanent presumption in favour of sustainable development, replacing the previous “tilted balance” approach under paragraph 11 of the 2024 NPPF as noted above. The presumption is now clearly structured within Chapter 4 ‘Achieving Sustainable Development (within policies S3 – S6). There is no qualifying criteria or threshold; Policy S3 ‘Presumption in Favour of Sustainable Development’ clearly states that “Decisions on development proposals should apply a presumption in favour of sustainable”.

- 3.4 Policy S3 goes on to state that Policy S4 ‘Principle of Development Within Settlements’ should be applied when considering development proposals within settlements, and Policy S5 ‘Principle of Development Outside Settlements’ applied for development proposals outside settlements. These policies are of **critical importance** to the development the subject of this current PiP application, and add further justification for the granting of PiP. The development is no longer purely acceptable within the context of the former “tilted balance”, it is now acceptable in principle from the outset due to its alignment with the new national decision-making policies.

Policy S4 ‘Principle of Development Within Settlements’

- 3.5 Policy S4 (1) states that development proposals within settlements 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 as a whole. The NPPF however introduces a new ‘settlement’ definition which is as follows:

Settlement: *Includes cities, towns, villages and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the development is complete. This includes areas defined as a settlement in the development plan (whether using defined settlement boundaries or equivalent terms, or criteria for identifying settlement extents where boundaries have yet to be defined). Settlements do not include hamlets and scattered groups of houses located outside predominantly built-up areas, unless specifically defined as a settlement in the development plan. For the purpose of this Framework they also exclude villages which lie within and are defined as part of the Green Belt in the development plan.*

- 3.6 The application site lies within the village of Chittoe Heath; it is not identified as a settlement within the WCS, which has the now out-of-date approach to defining settlements, but is a rural settlement with a main built-up area and has formerly had two Churches (the Chittoe Heath Methodist Chapel being within 100m of the application site) and is currently served by businesses such as the Collins Farm Shop and Café, the village garage and Pagets Farm Shop. The original Planning Statement described Chittoe Heath as one of Bromham’s five hamlets being considered for housing allocations as part of the emerging Neighbourhood Plan, however

under new national decision-making policies S3 and S4 there is a presumption in favour of sustainable, and there are no adverse effects associated with the proposal that would substantially outweigh its benefits.

Policy S5 'Principle of Development Outside Settlements'

- 3.7 Notwithstanding the above, it is recognised that the Local Planning Authority (LPA) will need outline its own interpretation of the new definition of 'settlement', and therefore should it take a contrary view Policy S5 will be relevant, and in this case lends strong support for the principle of development currently proposed. However, in the absence of any tested policy the applicants are entitled to interpret the definition of a settlement as one of five hamlets served by facilities and recognised by the Parish as a sub division of that parish.
- 3.8 Policy S5 (1) sets out a list of developments that are acceptable in principle outside settlements, unless the benefits of doing so would be substantially outweighed by any adverse effects. The developments listed within S5 (1) are those that have typically been supported by both national and local planning policy such as agricultural, rural and tourism developments, and gypsy, traveller or travelling showpeople accommodation. However, there is a significant change in policy position with a much broader range of developments being permitted in principle, with the headline being residential and mixed-use developments within reasonable walking distance of a well-connected station.
- 3.9 The developments that are acceptable in principle outside settlements and apply to the current proposal are however outlined within Policy S5 (1) 'c', 'd', and 'e' which are as follows:
- c. The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the existing building. In the case of proposals for a replacement building, it should be for the same use and not disproportionately larger than the one it replaces;*
 - d. The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential);*

e. Limited infilling within groups of houses;

- 3.10 The development the subject of this PiP application results in the redevelopment of previously developed land which forms a part of the main built-up area at Chittoe Heath. The existing holiday units and stable building will be replaced. The proposed development therefore benefits from the support from criteria ‘c’, ‘d’, and ‘e’ of Policy S5 (1), however it squarely aligns and has the full support of criterion ‘d’.
- 3.11 The land complies with the NPPF’s definition of ‘previously development land’ and the planning history of the site demonstrates this is an established area of common ground with the LPA. The national decision-making policy is clear that the current use of the land does not need to be residential due to the reference to a “change of use to residential or mixed-use including residential” being permitted. The PiP scheme will however see the redevelopment of the established residential land (C3 ‘Dwellinghouse’ use albeit restricted to holiday accommodation), and smaller equestrian area, for new dwellings to meet a local need. As such, should the site be considered to fall outside of a ‘settlement’, its redevelopment is now acceptable in principle under Policy S5 (1) ‘d’.
- 3.12 It is therefore clear that the presumption in favour of sustainable development, as set out within Policy S3, applies to the proposed development and it is acceptable in principle. Policy S5 (2) however outlines that in applying the policy, “the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances”.
- 3.13 The new NPPF now limits the situations or policies which require developments to be refused in specific circumstances. There are 15 specific circumstance, rather than generic policies, which include the following:

- failure to satisfy the retail sequential test (TC3)
- proposals for the extraction of peat at new or extended sites (M5)
- proposals that do not make efficient use of land (L3)
- development of a poor design (DP3)
- development that has severe impact on the transport network (TR6)
- proposal for hot food takeaways in certain locations (HC5)
- development at risk of flooding in certain circumstance (F6 & F7)
- developments that result in significant harm to biodiversity (N2) or impact on areas of particular importance for biodiversity and geodiversity (N6)
- proposal for major development within protected landscapes other than in exceptional circumstance (N4)
- developments that would cause harm to the significance of a designated heritage asset, unless the harm justified / outweighed by public benefits (HE6)

3.14 None of the national decision-making policies indicate that permission should be refused for the development the subject of this PiP application. There are therefore no adverse effects which need to be considered against the benefits of the proposal. Policy S5 (2) is satisfied and the development remains acceptable in principle.

3.15 Parts (3), (4), and (5) of Policy S5 are not relevant to the current proposal. Part (3) relates to 'isolated homes', Part (4) relates to developments that do not fall within any of the Policy S5 (2) categories, and Part (5) relates land within the Green Belt or designated as Local Green Space.

3.16 It is however considered important to highlight the new NPPF definition of 'isolated homes', which are permitted by Policy HO11 'Isolated Homes in the Countryside'. The Court of Appeal within the Braintree District Council v Secretary of State [2018] noted that the NPPF did not then define 'isolated' and held that an isolated home is one that is physical and spatially separate or remote from a settlement. The new NPPF however clarifies that, for the purposes of the new national decision-making policies around achieving sustainable development, isolated homes are "those lying outside settlements or groups of houses". The application site forms

part of a group of houses within Chittoe Heath and is not isolated within the context of any up-to-date planning policies.

- 3.17 The proposed development the subject of this PiP therefore fully complies with Policy S5 (1) to (5) and is therefore acceptable in principle.

Planning Inspectorate and Wiltshire Council Position

- 3.18 The Planning Inspectorate issued an appeal decision (reference 6005664) on the 18 August 2026, the day after the publication of the new NPPF, granting planning permission for 110 dwellings on Land West of Spratts Farm, Queenborough Road, Southminster, Essex, CM0 7AD. The appeal is significant because a key material planning consideration which lead to the decision was the scheme's compliance with Policy S5 (1) 'h' of the new NPPF. The Inspector confirmed the new policy provision that allows development outside settlements applied and confirmed there were no national decision-making policies which state such proposals should be refused.
- 3.19 The application of the new national policy aligns with assessment provided above for this current PiP. It demonstrates that new Policy S5 permits development outside settlements which would not traditionally have been permitted in principle (albeit may have been permitted under the 'tilted balance'). It shows the critical importance of the new NPPF in action, and the Government's 'default yes' position towards boosting the supply of housing.
- 3.20 The new NPPF was published only a week ago but the clear overview and advice issued by Officers of the LPA to the Western Area Planning Committee (WAPC) at its meeting on the 19 August 2026 is useful and significant.
- 3.21 The WAPC was considering an outline planning application, reference PL/2025/00626, for 58 dwellings on land North of Berryfield Lane, Melksham, SN12 6DT. Prior to the debate the Area Development Management Team Leader provided an overview of the Council's current Housing Land Supply position, the new NPPF, and weight to be given to

the WCS. A recording of the meeting can be seen in full on the Council's [website](#), but these observations highlight the clear information and advice given to members of the WAPC:

*"It might sound pedantic but we have got a significant shortfall whether it's 2.16 years [as determined by the Inspector at the Snarlton Farm Appeal Decision dated 30 July 2026], 2.42, or the very latest published statement on housing land supply across the whole of Wiltshire at 2.8. **It's far far short of the 5-year requirement, and that shortfall is very very significant. It's not limited. It's very very significant and it merits very substantial weight in every planning balance for housing development**"*

- 3.22 The Officer advised the Council has a shortfall of ten and a half thousand dwellings, and twelve hundred affordable homes, and the implications;

"They [the housing deficit] merit substantial weight in planning balance for any housing development whether it is within a settlement or without a settlement or outside a settlement".

- 3.23 The Officer then advised the weight to be given to the benefits of residential schemes within the context of the new NPPF and national-decision making policies:

*"Decision makers must continue to assess every single proposal on its individual merits, but you must balance the identified harms against **the now substantial benefits of housing delivery. So previously it was demonstrably significant, now its substantial. So the Government have elevated the way you must now give to housing growth**". and*

"The NPPF has very material planning considerations weight. ... It recognises the primacy of the local plan. However, the local if our local plan is in part or wholly inconsistent with the new NPPF or has a failing strategic policy or restrictive policies at a time we've got a housing land supply deficit it means that that made adopted local plan can only be given very limited weight in any planning balance, not limited, very limited. That's the words from the NPPF".

- 3.24 The information and advice offered by Officers to the WAPC applies across the board to all decision makers and aligns with the assessment provided with paragraphs 3.1 to 3.17 above.

4.0 CONCLUSION

- 4.1 The Government's publication of the new NPPF on the 17 August 2026 has had a significant impact on the assessment of the PiP application for the erection of up to six detached dwellings on previously developed land at Wayside, 12 Chittoe Heath, Bromham, Wiltshire, SN15 2EH.
- 4.2 The 2026 NPPF introduces a new presumption in favour of sustainable development (Policy S3) and introduces "default yes" policies for certain types of developments within and outside settlements (Policies S4 & S5). The development the subject of this PiP application can be classified as falling within a settlement and / or the redevelopment of previously developed land and is therefore acceptable in principle under the new national decision-making policies.
- 4.3 The new national decision-making policies have primacy over the out-of-date Local Plan in this case due to the critical importance that should be afforded to the new NPPF and the "very limited weight" that should be afforded to the Spatial Strategy of the Local Plan because it is materially inconsistent with national decision-making policies. The new NPPF policies on achieving sustainable development indicate that the proposed development is now acceptable in principle.
- 4.4 The PiP application has a narrow focus with only the principle of the proposed residential development being considered. The scope of the assessment is limited to the **location, land use and amount of development**. However, issues relevant to these 'in principle' matters should be considered at the permission in principle stage. Other matters should be considered at the technical details consent stage. The new NPPF provides support in principle for the proposed development and there are no other matters or policies that indicate that PiP should be refused.
- 4.5 The application as originally submitted was considered to be acceptable within the context of the 2024 NPPF presumption in favour of sustainable development. The new NPPF strengthens the presumption in favour of development with more weight in favour of development. However,

notwithstanding these points, national policy now supports the principle of development and therefore it is respectfully requested that PiP be granted.