

Planning Statement Addendum

Project:	PL/2025/09484 Land North of Swindon Road, Royal Wootton Bassett	Date:	September 2026
Subject:	Implications of the August 2026 National Planning Policy Framework	tor&co Reference:	227627

1.0 Introduction

- 1.1 This Planning Statement Addendum has been prepared by tor&co on behalf of Gleeson Land in respect of planning application ref. PL/2025/09484 for outline residential development on land north of Swindon Road, Royal Wootton Bassett.
- 1.2 The application seeks outline planning permission with all matters reserved except access for up to 135 dwellings, the creation of a new vehicular access with footways from Swindon Road, provision of informal and formal open space, together with associated highways, landscape, earth works and level changes, foul and surface water drainage facilities, utilities provision and other associated and necessary infrastructure. The proposal would provide 40% affordable housing.
- 1.3 The application was submitted under the December 2024 National Planning Policy Framework. A revised National Planning Policy Framework was published on 17 August 2026 (2026 NPPF), replacing the December 2024 Framework.
- 1.4 This Addendum has been prepared at the request of Wiltshire Council to provide an update in regard to the implications of the 2026 NPPF for the determination of the application. It should be read alongside the submitted Planning Supporting Statement and other supporting application documents.
- 1.5 The revised NPPF is relevant to the determination of the application as it changes the approach to housing development outside of settlement (Policy S5), placing greater emphasis on the need to approve development, well-related to the settlement and where there is a housing need, unless any harm would substantially outweigh these benefits.
- 1.6 There is a well-established, agreed and pressing need for additional housing in Wiltshire and whilst there will be some inevitable harm arising from the development, in terms of the change from agricultural greenfield land to urban land, it is important to clarify that no substantial harm has been identified through the application process. In terms of the benefits, collectively and in some cases individually, these are substantial. Planning permission should be granted.

- 1.7 The assessment below considers in detail the national decision-making policies relevant to the proposal and whether they alter or reinforce the planning case set out in the submitted Planning Supporting Statement.

2.0 August 2026 National Planning Policy Framework

- 2.1 The 2026 NPPF was published on 17 August 2026 and replaces the December 2024 Framework. Its policies are material considerations which must be taken into account in decision making from the date of publication. The national decision making policies should be read alongside the policies in the development plan, while plan making policies should not be used when determining development proposals.
- 2.2 Annex A states that development plan policies, or parts of policies, which are materially inconsistent with the national decision-making policies should be given very limited weight, except where they have been examined and adopted or made against the 2026 NPPF. Other development plan policies should not be given reduced weight simply because they were adopted before the Framework was published.
- 2.3 Of particular relevance to this application, Policy S3 requires decisions on development proposals to apply a presumption in favour of sustainable development and directs development outside settlements to be considered under Policy S5.
- 2.4 The following section considers the implications of the relevant national decision-making policies for the proposal. The conclusions of the submitted Planning Supporting Statement remain unchanged except where addressed below.

3.0 Planning assessment

Principle of development

- 3.1 As set out in the submitted Planning Supporting Statement, the site lies outside the defined settlement boundary for Royal Wootton Bassett and is not allocated for development. The proposal therefore conflicts with Core Policy 2 of the Wiltshire Core Strategy.
- 3.2 Royal Wootton Bassett is identified as a Market Town within the Core Strategy. The site lies on the northern edge of the town, with residential development beyond Swindon Road, and is within walking and cycling distance of local services and schools, with employment opportunities available nearby. The submitted Planning Supporting Statement therefore identifies the site as a sustainable location for residential development.
- 3.3 The relationship of the site with the wider pattern of development on the northern edge of Royal Wootton Bassett is also relevant. Immediately to the west, Wiltshire Council's Strategic Planning Committee resolved on 16 June 2026 to grant outline planning permission for up to 425 dwellings and associated mixed-use development at Midge Hall Farm (ref. PL/2025/02340),

subject to completion of a Section 106 agreement. In assessing that proposal, the case officer described the site as forming a *“transitional edge of settlement parcel between the built-up extent of Royal Wootton Bassett to the south and open countryside to the north beyond the M4 corridor”* and considered that it occupied *“a visually and functionally transitional position”* in defining a new settlement edge. The officer report also recorded that the Midge Hall Farm site is *“located outside but adjacent to Royal Wootton Bassett, which is classified as a Market Town”*. This recent assessment of the immediately adjoining land further reinforces the conclusion that the application site is physically well related to Royal Wootton Bassett.

- 3.4 Wiltshire Council is currently unable to demonstrate a five year supply of deliverable housing sites, with a current supply of 2.8 years, as confirmed at the Wiltshire Council Western Area Planning Committee meeting on 19 August 2026.
- 3.5 Policy S5(1)(j) of the 2026 NPPF provides for development outside settlements where it would address an evidenced unmet need. This expressly includes housing where the local planning authority cannot demonstrate a five year supply, provided the development is physically well related to an existing settlement and is of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure. Such development should be **approved** unless the benefits would be **substantially outweighed** by adverse effects when assessed against the national decision-making policies.
- 3.6 The proposal falls within these circumstances. The Council's housing land supply shortfall establishes an evidenced substantial unmet need for housing. The site is physically well related to Royal Wootton Bassett and the application demonstrates that development of the scale proposed can be accommodated, with the necessary access, drainage, utilities, open space and other infrastructure provided or secured through appropriate planning conditions and obligations.
- 3.7 The 2026 NPPF therefore provides more explicit support for the principle of development than the December 2024 Framework. The submitted Planning Supporting Statement relied principally on the presumption in favour of sustainable development arising from the Council's housing land supply shortfall. **Policy S5(1)(j) now expressly identifies housing development outside settlements as capable of approval in these circumstances.**
- 3.8 This is also relevant to the weight to be given to the conflict with Core Policy 2. Insofar as the restrictive effect of Core Policy 2 would prevent development which satisfies Policy S5(1)(j), it is materially inconsistent with the national decision making policy. Annex A states that development plan policies, or parts of policies, which are materially inconsistent with national decision making policies should be given **very limited weight**.
- 3.9 **The 2026 NPPF therefore materially strengthens the policy support for the principle of development and the planning case for approval of this application.**

Housing delivery

- 3.10 The proposed development would deliver up to 135 homes in the context of an evidenced, acute, unmet need for housing.
- 3.11 Policy HO7 states that substantial weight should be given to the benefits of providing homes which contribute towards meeting the evidenced accommodation needs of the community.
- 3.12 The delivery of up to 135 homes would make a meaningful contribution towards meeting Wiltshire's housing needs. In accordance with Policy HO7, this benefit should be afforded substantial weight.

Affordable housing

- 3.13 The proposed development would provide 40% affordable housing in accordance with Core Policy 43 of the Wiltshire Core Strategy, equating to up to 54 affordable homes. The tenure and mix would be agreed with the Council and secured through the Section 106 agreement.
- 3.14 Policy HO8 requires development proposals to meet or exceed up to date development plan requirements for affordable housing. The proposal is consistent with that approach, and the delivery of 40% affordable housing represents a significant social benefit.

Sustainable location and transport

- 3.15 Policies TR3 and TR6 provide the relevant national decision making framework for sustainable transport and transport impacts. Development which could generate a significant amount of movement should be located in sustainable locations, limiting the need to travel particularly by private car and offering a genuine choice of transport modes. Such development should also be supported by an appropriate Transport Assessment and Travel Plan.
- 3.16 The submitted Planning Supporting Statement and Transport Assessment explain that the site lies on the edge of Royal Wootton Bassett and is within walking and cycling distance of a range of services and facilities. The proposal incorporates improvements to pedestrian and cycle infrastructure along Swindon Road, together with connections to existing public transport infrastructure.
- 3.17 The submitted Transport Assessment concludes that suitable access can be provided for all modes and that the development would not materially affect the existing safety or operation of the local highway network.
- 3.18 The application is also supported by a Framework Residential Travel Plan designed to reduce reliance on single-occupancy vehicle journeys.
- 3.19 The proposal is therefore consistent with the principles of Policy TR3 and TR6. This conclusion is also relevant to Policy S5(1)(j), supporting the conclusion that the site is physically well related to Royal Wootton Bassett

and that development of the scale proposed can be appropriately accommodated.

Landscape and visual effects

- 3.20 Policy N2 requires development proposals to consider the environmental qualities of land, including landscape character and the natural beauty of the countryside, and to identify opportunities for those qualities to be conserved or enhanced.
- 3.21 The application is supported by a Landscape and Visual Appraisal which assesses the effects of the proposed development on landscape character and visual receptors. The appraisal concludes that, following establishment of the proposed landscape mitigation, effects on landscape character would be Minor Adverse and visual effects would be no greater than Minor Adverse.
- 3.22 The Council's Landscape Officer confirmed on 18 May 2026 that there was no objection, subject to conditions. The Officer was generally satisfied that the Landscape and Visual Appraisal had been undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment and expressly agreed with its general conclusions regarding the residual landscape and visual effects of the development.
- 3.23 The Landscape Officer also recognised the relationship of the site with the wider planned growth of Royal Wootton Bassett. In particular, the response notes that the site lies between two substantial development sites which were identified as allocation sites through the Local Plan Review process and concludes that the application site would more likely be perceived as an infill site between those areas of planned growth rather than an outlier of development in the rural countryside.
- 3.24 The Officer was also supportive of the design strategy to leave a significant proportion of the northern part of the site free from built development, both to provide an appropriate setting for the scheduled monument and to avoid built development appearing prominently on the skyline in views from more sensitive receptors.
- 3.25 The Landscape Officer identified a number of detailed matters to be addressed at reserved matters stage, including tree planting, urban greening, SuDS integration, landscape management and detailed hard and soft landscape design. These matters do not alter the overall no objection position and can be appropriately addressed through reserved matters and planning conditions.
- 3.26 The proposed development therefore accords with the objectives of the 2026 NPPF in relation to landscape character and the natural environment. The Council's consultation position confirms that there is no landscape objection to the principle of the development, subject to appropriate detailed design and landscape mitigation.

Agricultural land

- 3.27 Policy N2 requires development proposals to consider the quality of agricultural land and, where significant development of agricultural land is necessary, to use areas of poorer quality land where possible.
- 3.28 A detailed Agricultural Land Classification survey undertaken in July 2026 confirms that all agricultural land within the site is Subgrade 3b. No best and most versatile agricultural land is therefore present within the site.
- 3.29 The proposed development would therefore not result in the loss of best and most versatile agricultural land.

Ecology and biodiversity

- 3.30 Policy N2 requires development to minimise adverse effects on biodiversity and take suitable opportunities to connect to and strengthen ecological networks.
- 3.31 The proposed development incorporates an integrated landscape and ecological strategy, including new hedgerow and tree planting, wildflower meadow, native scrub planting and SuDS features with associated wetland habitats. Existing ecological features are retained and protected wherever practicable, including the northern hedgerow which provides an important bat foraging and commuting route.
- 3.32 The application is supported by a suite of ecological surveys and assessments. Following its review of the submitted information, the Council's Ecologist confirmed on 30 July 2026 that there was no objection, subject to conditions. The Ecologist concluded that the submitted ecological information was adequate to inform the application, and that no further ecological surveys were required at this stage.
- 3.33 In relation to protected species, the Ecologist confirmed that sufficient information had been provided to demonstrate that the favourable conservation status of bats could be maintained, subject to the proposed mitigation. The Council also welcomed the retention of the northern boundary as a dark foraging and commuting corridor and the District Level Licence obtained from Natural England in relation to great crested newts. Further ecological mitigation, enhancement and protection measures can be secured through the recommended planning conditions and subsequent reserved matters applications.
- 3.34 The proposed development is subject to the statutory requirement to deliver at least 10% Biodiversity Net Gain. The submitted Biodiversity Metric demonstrates that this can be achieved, with the detailed delivery and long-term management of the biodiversity enhancements to be secured through the statutory Biodiversity Gain Plan and a Habitat Management and Monitoring Plan. The Council's Ecologist has accepted the submitted baseline biodiversity information and has raised no objection to the proposed approach, subject to the identified requirements.

- 3.35 Policy N2 also requires integrated nest boxes, commonly known as swift bricks, to be incorporated into development unless there are compelling technical reasons preventing their use or making them ineffective. The Ecological Impact Assessment (EAD Ecology, 2025) states that a minimum of one Schwegler Type 1A integrated swift box (or similar approved) per unit (135 total) would be incorporated into new buildings within the Site. This commitment can be addressed through the detailed design of the scheme at reserved matters stage and secured by condition.
- 3.36 The proposal therefore accords with the objectives of Policy N2 relating to biodiversity and nature recovery. The Council's latest consultation position confirms that there is no ecological objection to the proposed development, subject to appropriate conditions and the statutory Biodiversity Net Gain requirements.

Heritage and archaeology

- 3.37 The submitted heritage assessment identifies less than substantial harm to the significance of designated heritage assets arising from changes within their setting. The application site also contains the scheduled monument comprising the post mill at Church Hills. The scheme has been designed to avoid development on the monument itself and incorporates a 50 metre buffer around it as open space.
- 3.38 Policies HE4 to HE6 provide the relevant national decision-making framework. Policy HE6 requires substantial weight to be given to the conservation of designated heritage assets, with greater weight applying to assets of greater importance. Any harm to a designated heritage asset is a matter of considerable importance and weight.
- 3.39 Where harm would arise, Policy HE6 requires the effect on the asset and its significance to be weighed against the public benefits resulting from the proposal.
- 3.40 The public benefits of the proposal include the delivery of up to 135 homes in an area with an evidenced unmet housing need, including up to 54 affordable homes, publicly accessible formal and informal open space, biodiversity enhancements, improvements to walking and cycling infrastructure, economic benefits and the provision of supporting infrastructure.
- 3.41 Importantly, Policy HO7 now expressly requires substantial weight to be afforded to the housing delivery benefit. The introduction of Policy S5(1)(j) also provides express national policy support for the principle of development in circumstances where there is an evidenced unmet need. These changes reinforce the weight of the public benefits which fall to be considered in the heritage balance.
- 3.42 The 2026 NPPF therefore does not fundamentally alter the approach to assessing the identified heritage effects but strengthens important elements on the public benefits side of the balance.

- 3.43 Historic England initially commented on 21 January 2026, identifying less than substantial harm to the significance and setting of the scheduled Post Mill at Church Hills and requesting the submission of an Archaeological Management Plan. Following submission of that document on 8 April 2026, Historic England confirmed on 30 April 2026 that it had no objection, subject to the Archaeological Management Plan and its implementation being secured by condition or through the Section 106 Agreement.
- 3.44 The Council's Conservation consultation subsequently recorded no objection on 14 May 2026. Taken together, these responses confirm that the identified heritage harm does not provide a reason to withhold permission, subject to the proposed mitigation.
- 3.45 In relation to archaeology, the site has already been subject to archaeological evaluation comprising 43 trial trenches. The investigations identified historic agricultural activity and former field boundaries, together with an area of medieval activity and limited Romano-British evidence. No further remains associated with the scheduled post mill were identified. The Council's Archaeology Officer initially objected on 2 January 2026 pending further information but subsequently confirmed on 5 May 2026 that there was no objection, subject to a condition securing an appropriate programme of archaeological investigation.

Climate change and sustainability

- 3.46 Policies CC2 and CC3 require development proposals, where relevant, to contribute to climate change mitigation and adaptation through measures including sustainable patterns of movement, good access to facilities, energy-efficient design, green infrastructure and sustainable drainage.
- 3.47 The application is supported by an Energy and Sustainability Statement and incorporates measures relating to sustainable transport, green infrastructure and SuDS, with the detailed design of the development to be addressed at reserved matters stage. The 2026 NPPF does not alter the conclusions reached in the submitted Planning Supporting Statement in this respect.

Flood risk and drainage

- 3.48 Policies F4 to F8 provide the relevant national decision making framework for flood risk and drainage. They seek to ensure that flood risk is appropriately assessed, that development is safe for its lifetime without increasing flood risk elsewhere and that sustainable drainage is incorporated where appropriate.
- 3.49 The site lies within Flood Zone 1. The submitted Flood Risk Assessment and Drainage Strategy concludes that flood risk can be appropriately managed through SuDS, with attenuated discharge to the existing ditch along the eastern boundary. Infiltration has been demonstrated not to be feasible, and the proposed strategy follows the surface water disposal hierarchy. The submitted Planning Supporting Statement similarly concludes that flood risk

has been adequately managed and that off-site flood risk would not be increased.

- 3.50 Following consideration of additional drainage information, the LLFA confirmed on 11 August 2026 that it had no objection, subject to conditions. It confirmed that the proposed surface water disposal strategy follows the disposal hierarchy, supported the proposed SuDS features and confirmed that the submitted calculations demonstrate no flooding in any storm event up to the 1 in 100 year event.
- 3.51 The LLFA also recommended within its informatives that a sequential test be undertaken. Policy F5(2)(b)(ii), however, confirms that where a site is at risk from surface water flooding only, the sequential test need not be applied where a site specific flood risk assessment clearly demonstrates that the proposed layout, design and mitigation would keep occupiers and users safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere. The applicant confirmed to the Council on 20 August 2026 that the submitted Flood Risk Assessment and Drainage Strategy address the identified surface water flood risk on this basis and requested that the Council proceed on that basis and remove the LLFA informative.
- 3.52 The remaining matters identified by the LLFA relate to exceedance flows, interception and detailed SuDS design and can be addressed through condition. The latest consultation response therefore confirms that there is no technical objection from the LLFA to the proposed development on flood risk or drainage grounds.

4.0 Planning balance and conclusion

- 4.1 The August 2026 NPPF materially strengthens the national policy support for the proposed development and the need to address the housing crisis with the delivery of new homes, well related to existing settlements.
- 4.2 Most significantly, Policy S5(1)(j) expressly identifies development which would address an evidenced unmet need as a form of development which should be approved outside settlements unless its benefits would be **substantially outweighed** by adverse effects when assessed against the national decision-making policies in the Framework. The policy expressly identifies the absence of a five year supply of deliverable housing sites as evidence of unmet housing need.
- 4.3 The proposed development satisfies the relevant requirements of Policy S5(1)(j). The Council's 2.8 year housing land supply establishes an evidenced unmet need for housing, the site is physically well related to the existing settlement of Royal Wootton Bassett, and the application demonstrates that development of up to 135 homes can be accommodated having regard to existing and proposed infrastructure. There are no adverse effects that would substantially outweigh the benefits of the delivery of housing.

- 4.4 Policy HO7 additionally states that substantial weight should be given to the benefits of providing homes which contribute towards meeting evidenced accommodation needs. The delivery of up to 135 homes should therefore attract substantial weight in the planning balance. The provision of 40% affordable housing, equating to up to 54 affordable homes, represents a further significant benefit of the proposal.
- 4.5 The principal development plan conflict arises from the site's location outside the defined settlement boundary and the resulting conflict with the restrictive effect of Core Policy 2. The proposal is otherwise well related to Royal Wootton Bassett, which is identified as a Market Town within the Core Strategy, and the application demonstrates that the development can be accommodated without giving rise to technical or environmental effects which would justify withholding permission.
- 4.6 Policy S5(1)(j) now expressly provides for housing development outside settlements in circumstances such as these. Insofar as the restrictive effect of Core Policy 2 would prevent development which meets the requirements of Policy S5(1)(j), it is materially inconsistent with the national decision making policy. Annex A states that development plan policies, or parts of policies, which are materially inconsistent with national decision making policies should be given very limited weight.
- 4.7 The proposal would deliver substantial social benefits through the provision of market and affordable housing. It would also provide publicly accessible open space, biodiversity enhancements, improved pedestrian and cycle infrastructure and economic benefits associated with construction and increased expenditure within the local area.
- 4.8 These benefits must be weighed against the identified adverse effects of the development, including the conflict with the development plan spatial strategy, landscape change arising from the development of an agricultural field and the identified harm to the significance of designated heritage assets.
- 4.9 The 2026 NPPF does not remove the need to undertake that planning balance. It does, however, materially change the national policy context within which it is undertaken. Policy S5 provides express support for the principle of housing development outside settlements where the relevant criteria are satisfied, while Policy HO7 states that substantial weight should be given to the housing delivery benefits.
- 4.10 Overall, the benefits of the proposed development would not be substantially outweighed by its adverse effects when assessed against the national decision making policies in the 2026 NPPF. The proposal therefore falls within the circumstances in which Policy S5 indicates that development should be approved.
- 4.11 The August 2026 NPPF consequently provides additional and material support for the proposed development and strengthens the planning balance



in favour of granting outline planning permission, subject to appropriate planning conditions and completion of the necessary Section 106 agreement.