

Land at Gate Farm, High Street, Sutton Benger
Planning Application Ref: PL/2025/09825

Planning Supporting Statement (incorporating Statement of Engagement and Affordable Housing Statement)

Addendum Note

September 2026

This Addendum notes amendments to the Planning Statement (dated December 2025) as follows:

(deletions denoted with strikethrough and highlighted blue)

(amendments / additions highlighted yellow)

(note that all plans and drawings referenced are those submitted separately, not those in the PS)

1. Introduction and Background

- Paragraphs 1.1 and 1.3 amended
- Tables 1.1 and 1.2 amended

2. Site Context

- Paragraphs 2.5, 2.8, 2.21, 2.22, and 2.23 amended
- Paragraph 2.24 added

3. Development Proposals

- Paragraphs 3.4, 3.5, 3.7, 3.9, 3.20, 3.22, 3.27 and 3.28 amended

4. Statement of Engagement

- No amendments

5. Planning Analysis

- Paragraphs 5.1 to 5.30 replaced
- Paragraphs 5.36, 5.39, and 5.66 to 5.70 amended

6. The Planning Balance and Sustainable Development

- Paragraph 6.2 replaced
- Paragraphs 6.4 to 6.6 amended

SECTION 1: INTRODUCTION AND BACKGROUND

Paragraph 1.1 amended, to read:

This Planning Statement (incorporating the Statement of Engagement and Affordable Housing Statement), has been prepared by Gillings Planning on behalf of Gleeson Land Limited (*the Applicant*), and is submitted in support of a planning application (in outline form) for up to 90 dwellings (class C3) on “Land at Gate Farm, High Street, Sutton Benger” (*the site*). It is prepared and submitted in accordance with policy DM1 (1b) of the National Planning Policy Framework, August 2026 (NPPF) to set out how this proposal is consistent with the relevant Development Plan and national decision-making policies; the outcome of pre-application engagement and how the proposals evolved as a result; and reference to potential planning obligations.

Paragraph 1.3 replaced, to read:

This Statement provides a planning analysis to demonstrate that the submitted proposals are acceptable in planning terms and in accordance with relevant planning policy and guidance. Where there is conflict with the Development Plan, it is noted that ~~the tilted balance is engaged, and where this Planning Statement confirms that the limited landscape harm identified does not significantly and demonstrably outweigh the benefits of the proposal,~~ policy S5 of the NPPF supports the principle of sustainable development outside of settlements – where paragraph 1. (j) is applied, and the benefits of the proposal are not substantially outweighed by any adverse effects, the presumption in favour of sustainable development should be applied, and planning permission granted.

Table 1.1: Schedule of Supporting Documentation – to be deleted and replaced with:

Document Title	Prepared by	Document Ref / Date – Submitted December 2025	Document Ref / Date – Submitted August 2026
Desk Based Archaeological Assessment (DBA)	tor&co	November 2025	Not updated
Design and Access Statement (DAS)	Stantec	December 2025	August 2026
Ecological Impact Assessment (EcIA)	EAD Ecology	December 2025	Not updated
Biodiversity Net Gain Metric and Calculations (BNG)	EAD Ecology	December 2025	September 2026
Flood Risk Assessment (FRA)	Rodgers Leask	November 2025	September 2026
Drainage Strategy (DS)	Rodgers Leask	November 2025	September 2026
Geo-Environmental Desk Study Phase 1 (GeoEnv)	Rodgers Leask	November 2025	Not updated
Ground Investigation Report	Rodgers Leask	-	April 2026
Heritage Statement	tor&co	November 2025	August 2026
Landscape and Visual Impact Assessment (LVIA)	Tyler Grange	December 2025	September 2026

Document Title	Prepared by	Document Ref / Date – Submitted December 2025	Document Ref / Date – Submitted August 2026
Energy and Sustainability Statement	Daedalus	November 2025	Not updated
Transport Assessment	Pegasus Group	December 2025	Not updated
Framework Residential Travel Plan	Pegasus Group	December 2025	Not updated
Preliminary Arboricultural Impact Assessment (AIA)	Tyler Grange	November 2025	August 2026
Utility Statement	BTS Property Consultancy	December 2025	Not updated
Waste Management Strategy	Rodgers Leask	November 2025	Not updated
Planning Statement incorporating Statement of Engagement and Affordable Housing Statement	Gillings Planning	December 2025	(Addendum) August 2026

Table 1.2: Drawing Schedule – to be deleted and replaced with:

DRAWING TITLE	DRAWING REFERENCE Submitted December 2025	DRAWING REFERENCE Submitted September 2026
Site Wide Plans – for approval		
Site Location Plan	STN-GEN-SW-DR-MP-02F	-
Parameter Plan	STN-GEN-SW-DR-MP-10 C	STN-GEN-SW-DR-MP-10 G
General Arrangement Plan Access	P25-0894 PEG XX XX DR C 100 P2	P25-0894 PEG XX XX DR C 100 P4
Illustrative Plans / Drawings – for information only		
Illustrative Site Layout	STN-GEN-SW-DR-MP-06 C	STN-GEN-SW-DR-MP-06 G
Illustrative Landscape Mitigation and Enhancement Plan (ILMEP)	17958/P08	17958/P08 B

SECTION 2: SITE CONTEXT

Paragraph 2.5 to be amended as follows:

The site extends to **4.95 4.97** ha (which includes for 0.02ha of highway carriageway, to allow for the visibility splays) and is broadly square in shape, with access to the southwest of the site...

Paragraph 2.8 to be amended as follows:

The Landscape and Visual Impact Assessment by Tyler Grange and accompanying this application, confirms that the site is not the subject of any landscape designation, which indicates that it is not part of a **valued landscape as per paragraph 187 of the NPPF 'protected' or 'national' landscape as defined in the NPPF 2026**). It also confirms that the site is not considered 'valued' in and of itself. Whilst the site itself is devoid of built form, it is however strongly influenced by the residential dwellings and character to the east and south, which are visible across the site and readily appreciable from the landscape beyond the site to the west and north.

Paragraphs 2.21 and 2.22 to be replaced as follows:

~~The Wiltshire Local Plan Review is being prepared and was submitted to the Planning Inspectorate for examination on the 28th of November 2024. A focussed hearing session considering the Duty to Cooperate was held on 24th June 2025 and the Inspector has subsequently confirmed the Plan can progress to the next stage. Further Hearing sessions (stage 2) are understood to have commenced on the 11th of November 2025, with a second week of stage 2 hearings due to commence on the 2nd of December. Stage 3 hearings are anticipated to commence on the 10th of February 2026, with a additional stage 3 hearings programmed for the weeks 2nd and 16th of March 2026.~~

~~The most recent Local Development Scheme (March 2025) indicates that adoption of the Wiltshire Local Plan Review is anticipated for quarter 4 of 2025, though given the current stage of proceedings, this is unlikely. Draft policies of the emerging Local Plan therefore will hold very limited weight at this time.~~

The Wiltshire Local Plan Review submitted for Examination in November 2024 has now been withdrawn, and the Council has announced its intention to commence work on a new Local Plan – with a 30-month plan process expected to begin at the end of October this year. There are no draft policies that will carry any weight in determination of this planning application.

Paragraph 2.23 to be amended as follows:

Both the **NPPF** National Planning Policy Framework (published August 2026, “NPPF”), and the National Planning Practice Guidance (“NPPG”) are also a material consideration to the determination of this planning application. The Wiltshire Design Guide (adopted 2024) also forms a supplementary planning document of relevance. Those policies and parts of relevance to the proposal are set out **at Appendix 1**.

Paragraph 2.24 to be added:

The Council has most recently published its land supply as **2.8 years** (in June 2026, base date April 2025), with an identified supply of housing of 10,268 units against a requirement of 18,310 units across a five-year period - although a recent appeal decision (dated 18th July 2025) for a scheme of 2 no. dwellings on 'Land at Gate Farm' (LPA Ref. PL/2024/07903) confirmed the Council's five-year supply position to be **2.03 years**. Notwithstanding that the latest Housing Delivery Test (published 17th August 2026) suggests that the Council has delivered 93% of its housing requirement between 2022 and 2025, clearly the LPA cannot demonstrate a five year supply of deliverable housing sites, in accordance with the approach set out in Annex D of the NPPF – and the shortfall is substantial.

SECTION 3: DEVELOPMENT PROPOSALS

Paragraphs 3.4 and 3.5 to be amended as follows:

The proposed development is to be controlled by:

- Land Use and Access Parameter Plan (ref: STN-GEN-SW-DR-MP-10G)
- Site Access Plan General Arrangement Plan Access (ref: P25-0894 PEG XX XX DR C 100 P2P4)
- Site Location Plan (ref: STN-GEN-SW-DR-MP-02F)

An illustrative masterplan drawing (Illustrative Site Layout ref. STN-GEN-SW-DR-MP-06GG) is also provided (albeit for information only and not submitted for approval) in order to demonstrate at least one way in which 90 dwellings could be accommodated on the site. Other illustrative drawings are included, as listed in Section 1, but for information purposes only.

Paragraph 3.7 to be amended as follows:

Land Uses

The parameter plan demonstrates that the proposal comprises the following land uses and elements:

Residential Development Area (3.36 3.37 ha), which will accommodate:

- Up to 90 dwellings (use class C3), including both market and affordable homes.
- Primary infrastructure for the site, such as internal primary roads and access.
- Parking to serve the residential dwellings.
- Landscaping and SuDS.

Green Infrastructure Area (1.59 1.58 ha), which will accommodate:

- Public open space within the development, along with other green infrastructure and landscaping.
- Biodiversity enhancement (providing a contribution towards the overall biodiversity net gain in conjunction with off-site units).
- Drainage attenuation features, including a drainage basin(s).
- Other associated infrastructure (including a sub-station).

Paragraph 3.9 to be amended as follows:

As shown on the parameter and access plans, the main access for pedestrians and cyclists will be at the southeastern most corner of the site. From here, pedestrians and cyclists can link from the wider road network in Sutton Benger, and access the network of new footpaths/cycle routes to be provided within the site. A shared 3 metre-wide pedestrian / cycle route will be provided within the site along the southern boundary – as shown on the parameter plan.

Paragraph 3.20 to be amended as follows:

The parameter plan, showing up to 90no. dwellings on a (developable site area) site of 4.95 ha in total, demonstrates a maximum density of just over 18 dwellings per hectare (dph) across the site. This

correlates to ~~just under 27~~ 26.7 dph within the residential development area proposed (~~3.36~~ 3.37 ha). This is considered to be an appropriate density with regard to the site's context, being that of a low density approach for the site's edge of settlement location, whilst maximising the site's development potential and making efficient use of land, in accordance with policy.

Paragraph 3.22 to be amended as follows:

As evidenced within the LVIA submitted, landscaping forms an integral and crucial role within the overall design for the site, to ensure that the development will be 'landscape led' as described within the accompanying LVIA. Green Infrastructure, which includes Public Open Space, parameters are fixed at this stage, as above, which extends to some ~~1.59~~ 1.58 ha across the site.

Paragraph 3.27 to be amended as follows:

In relation to biodiversity net gain (BNG), the applicant commits to a net gain of at least 10%, where the BNG Assessment as submitted alongside this planning application (~~as part of the EclA~~) and the Technical Note (dated September 2026), both prepared by EAD Ecology relates. At present, and based on the illustrative layout (and landscaping plan), the proposed development would likely result in a net loss of ~~9.12~~ 8.45 habitat units (~~-45.31~~ -41.76%) and a net gain of ~~1.77~~ 1.75 hedgerow units (~~+71.41~~ +70.64%) can be secured.

Paragraph 3.28 to be amended as follows:

As a result, an additional ~~11.18~~ 10.47 habitat units would be required to achieve 10% Biodiversity Net Gain; the additional habitat units will be achieved by biodiversity offsetting, through the acquisition of offsite units/provision (likely secured via planning condition and/or s106 agreement). This however cannot be fixed until RM stage.

SECTION 5: PLANNING ANALYSIS

Delete Section 5 text paragraphs 5.1 to 5.30, and replace as follows:

- 5.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications is to be made with regard to the Development Plan, unless material considerations indicate otherwise. This is reiterated at paragraph 3 of the National Planning Policy Framework (“NPPF”), which also makes it clear that the NPPF is a material consideration in decision making and goes on to note (at 1.f of *Policy DM3: Determining development proposals*) that local planning authorities should *“Not refuse applications for development which should clearly be approved, having regard to their accordance with the development plan, the policies in this Framework and any other material considerations”* (1.f).
- 5.2. The NPPF (at Annex A) also confirms that the policies of the Framework *“...are material considerations which must be taken into account in decision-making from the day of its publication”* and goes on further to note that where Development Plan policies are materially inconsistent with the national decision-making policies set out in the NPPF they are to be given ‘...very limited weight’. Specifically, in applying a presumption in favour of sustainable development, policy S3 (1c) of the NPPF notes that *“...development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay”*.
- 5.3. The Development Plan in this case (where it is of relevance to these proposals, as noted in section 2 above, and **at Appendix 1**) is the Wiltshire Core Strategy (adopted 2015), the saved policies of the North Wiltshire Local Plan (adopted 2011), and the Sutton Benger and Draycot Cerne Neighbourhood Development Plan (NHDP) (made 2025).
- 5.4. In this context, the decision-making policies from the NPPF and those from the Development Plan which are most important in the determination of this application are listed at **Appendix 1** - along with commentary as to whether or not those policies are considered to be consistent with the national decision-making policies of the NPPF.
- 5.5. This section considers the application proposals against those relevant policies – by applying a presumption in favour of sustainable development it considers the principle of development to be acceptable where the proposal is for development that will address an evidenced unmet need for housing on a site that is physically well-related to an existing settlement – and that the benefits of approving the application would not be substantially outweighed by any adverse effects when assessed against the national decision-making policies of the NPPF. It then goes on to assess the proposed Access to and within the site – finding that this is suitable and safe, and finally concludes that the proposal complies with the Development Plan and NPPF in all other respects and should be approved without delay.
- 5.6. Reference is made in this section to assessments set out in the technical reports that have been submitted in support of the planning application (as noted in section 1 of this Planning Statement). Those reports, and their conclusions, should be referenced in full as part of the assessment of the planning application.

Presumption in favour of sustainable development

5.7. The NPPF makes it clear (at paragraph 15) that “the purpose of the planning system is to contribute to the achievement of sustainable development...”, which is essentially to meet “...the needs of the present without compromising the ability of future generations to meet their own needs” (paragraph 16). Paragraph 17 of the NPPF goes on to note that in seeking to achieve sustainable development the planning system has three overarching objectives, as follows:

“ ...

- a. *An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b. *A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible community facilities, public service infrastructure and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c. *An environmental objective – to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution”.*

5.8. Chapter 4 of the NPPF goes on to provide the policies to be applied in achieving sustainable development – setting out (at *Policy S3: Presumption in favour of sustainable development*) that decisions on proposals should apply a ‘presumption in favour of sustainable development’ – which means applying policy S5 outside of settlements (such as this).

5.9. This general presumption is reflected in the Development Plan, with *Core Policy 1: Settlement Strategy* confirming that new development is to be directed towards the most sustainable and accessible locations in Wiltshire. *Core Policy 2: Delivery Strategy* goes on to state that development will be delivered in the most sustainable manner, and distributed across the Housing Market Areas.

5.10. However, whilst noting that within the defined limits of development a presumption in favour of sustainable development is applied, *Core Policy 2* goes on to state that outside of those defined limits, only development that falls within an ‘exception policy’ (such as that listed under *Policy H4: Residential development in the open countryside* of the Saved Plan) is permitted.

5.11. In this case, the development proposed does not meet the criteria of an ‘exception site’ otherwise permitted. and it is acknowledged therefore (notwithstanding that this policy is inconsistent with the NPPF insofar as consideration of this site is made, and therefore only limited weight should be applied to it) that the proposals conflict with the Development Plan in this regard – being on a site outside of the settlement boundary. To this extent, there is also a conflict with saved *Policy H4* of the North Wiltshire Local Plan and *Policy SB11* of the Neighbourhood Plan (where the proposal represents new development in the countryside, not meeting an exception).

5.12. Turning to the NPPF, and in terms of adopting (under *Policy S3*) a presumption in favour of sustainable development. As this site is located outside of the settlement boundary, this means that

Policy S5: Principle of development outside settlements should be applied (S3.1b) in determining whether the proposals meet with that presumption and should therefore be approved.

5.13. Policy S5 is clear in noting that certain forms of development can be approved outside of settlements – “...*unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies...*”(of the Framework). Here, it is considered that the development proposal represents that set out at S5.1j), where it comprises development that would:

- Address an evidenced unmet need (in this case for a proposal involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites); and
- Be physically well-related to an existing settlement and is of a scale which can be accommodated.

The development addresses an evidenced unmet need

5.14. The Council’s minimum housing requirement is set out in *Core Policy 2* (for 42,000 new dwellings across the plan period – equating to 2,100 dwellings per annum). For the ‘rest of Chippenham Community Area’ (outside of Chippenham itself), *Core Policy 10: Spatial Strategy for the Chippenham Community Area* confirms that 580 new homes are to be delivered within the plan period.

5.15. These housing requirements have since been subject to increase under the introduction of the new standard method for calculating housing need, such that the housing need for Wiltshire is now published (in the Council’s latest Housing Land Supply Statement dated June 2026 with a base date of April 2025) as 3,488 dwellings per annum.

5.16. That Housing Land Supply Statement confirms a deliverable supply of 10,268 homes across a five-year period (2025 - 2030), against a five-year requirement of 17,438 new homes, increased to 18,310 new homes when a 5% buffer is applied, as required on the basis of the 2023 Housing Delivery Test result. This shortfall of over **8,000 homes** represents 2.8 years of deliverable supply - a very clear, and significant, shortfall. Against this context, the proposals would address an evidenced unmet need, where they will contribute to housing supply, and therefore engaging part j of policy S5 of the NPPF.

5.17. To this extent, the proposals are in accordance with *Core Policy 1*, which states that, in ‘Large Villages’ (such as Sutton Benger, as defined under *Core Policy 10*), development is limited to that which is ‘***needed to help meet the housing needs of settlements***’, along with that which would also improve employment opportunities, services and facilities. In the context of the increased housing requirement for Wiltshire, and the current lack of identified supply, it is considered that there is a clear and identified housing need not only in Sutton Benger, but throughout Wiltshire. The provision of housing on this site will help contribute to meeting an identified local community need.

5.18. Furthermore, the proposals are compliant with *Core Policy 45: Meeting Wiltshire’s Housing Needs*, where they will include a range of dwelling types, tenures, mix and sizes to meet housing need (albeit that the precise unit mix will be considered and determined at the RM stage), including the provision of 40% affordable housing (in compliance with *Core Policy 43: Providing Affordable Homes*).

5.19. In accordance with *Policy HO7: Meeting the need for homes* of the NPPF substantial weight should be applied to the benefits brought about by this proposal in providing homes that will meet the evidenced accommodation needs of the community. This includes the provision of affordable homes, noted as important under *Policy HO1: Assessing the need for homes*.

The development is physically well-related to an existing settlement and of a scale that can be accommodated

- 5.20. As noted above, and as *Core Policy 10* confirms, Sutton Benger is classed as a 'Large Village' settlement in the adopted settlement hierarchy, where it is recognised that, as a settlement, it benefits from a range of employment, services and facilities. The village is also easily accessible from Chippenham, defined as a 'Principal Settlement'. As a 'Large Village', Sutton Benger and its immediate surrounds can be seen as a sustainable location for growth where development is of an appropriate scale.
- 5.21. Whilst in the 'countryside', the site is not within the Green Belt or a Protected Landscape (i.e. a National Park or designated as a National Landscape) – therefore, it is free of more restrictive landscape constraints. In the context of the increased housing requirement for Wiltshire (as set out further below), and the lack of an identified supply, the site, which is located at the edge of Sutton Benger, can accordingly be considered suitable for accommodating the growth of Sutton Benger (as a Large Village Settlement) in general terms
- 5.22. The Transport Assessment that accompanies the planning application notes that the site is accessible to local services and facilities via walking and cycling routes and can be accessed by sustainable modes of Transport. There are a wide range of facilities close to the site, which can be reached without the use of the private car – including Sutton Benger C of E Primary School, a Doctors Surgery, Sutton Benger park and recreational grounds, pubs and restaurants. The nearest bus stop is approximately 300m to the east of the site, where the number 91 bus provides regular services into Chippenham (approximately 3 miles away).
- 5.23. The proposed density of a scheme of 90 dwellings on the site sits at just under 18dph (against the gross area of the site) and just under 27dhp (when considering the net developable area of the site). As set out in the DAS that accompanies the application, such density is considered entirely appropriate in this context and is reflective of the net densities of other housing developments across Sutton Benger. Notably, the proposed net density is slightly lower than that of the most recent proposal in an edge of village location (on its eastern boundary – where Gladman were the applicant). Overall, the proposal is to be provided at a density and scale that is considered appropriate in the site's context and location, whilst maximising the site's development potential and making efficient use of the land.
- 5.24. This approach is clearly in accordance with *policy L3: Achieving appropriate densities* of the NPPF, which (at 2.b) notes that outside of settlements “...development footprints should make the best use of a site's development potential...”. Point 4 of *policy L3* goes further, to note that proposals which do not do so should be refused. In this context, the proposed density represents development of an appropriate scale for the settlement and which provides an efficient use of the land available for development.
- 5.25. The site is located adjacent to the (western edge) of the settlement boundary for Sutton Benger, and is physically well-related to the village in this regard. It can be considered to be in a sustainable location, being suitable and accessible, and the proposal complies with *Core Policy 1* of the Core Strategy and *policy TR3* of the NPPF in this respect. The nature of the proposed development, being for housing, is entirely appropriate in this location adjacent to the settlement boundary of Sutton Benger, and as a logical extension to its north-western end. Its scale is appropriate in the context of the definition of a 'Large Village' and within its context, where the site benefits from its accessible location to a number of services and facilities.

Conclusion on Principle of Development

5.26. In summary, and against the context of the key policies insofar as they relate to principle of development, the proposals comply with the Development Plan and the NPPF where:

- The site is in a sustainable location, being suitable and accessible, and is free of more restrictive landscape constraints;
- Development on the site would provide a logical extension to the 'Large Village' of Sutton Benger which is physically well-related to the (existing) settlement;
- The proposals make provision for housing and thereby address an evidenced unmet need; and
- Whilst in illustrative form, it is demonstrated that the proposed development (of up to 90 dwellings) would be at a scale and density that is appropriate to the site's context and setting, and which makes efficient use of the land.

5.27. In applying *policy S3* and *policy S5* of the NPPF, it is concluded that the proposals constitute sustainable development in a form that can be approved (where the presumption in favour applies) outside of the settlement boundary.

5.28. It is acknowledged that *policy S5* confirms that certain forms of development (such as this, where it meets the criteria set out in 1(j), 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... (of the NPPF)”. *Policy S5.2* goes on to note that “in applying this 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”.

5.29. Thus, an assessment of any adverse effects must be made to confirm that these do not substantially outweigh the identified benefits. Against the site's context and location, the potential for adverse effects are identified as relating to the potential for landscape or heritage harm.

5.30. These are assessed at **paragraphs 5.37 to 5.72 of the Planning Statement**, (and in greater detail in the updated LVIA and Heritage Statement, submitted alongside the Planning Statement Addendum note), and should be referenced accordingly – where it is concluded that there are no adverse effects identified (for landscape / heritage or any other harm) such that they would constitute a reason for refusal.

5.31. Furthermore, the adverse effects identified (insofar as they cause only limited 'harm') do not substantially outweigh the extensive benefits identified (as set out at **paragraphs 5.73 to 5.95 of the Planning Statement**). In particular, and in applying *policy HO7: Meeting the need for homes* of the NPPF, substantial weight is given to the benefit of providing homes that will contribute to meeting an evidenced need. This alone would outweigh any limited harm identified as adverse effects, notwithstanding the multitude of other benefits identified to which weight is applied in the planning balance.

5.32. It is concluded that, in accordance with *policy S3* of the NPPF, and where *policy S5* has been applied (to proposals on a site outside of the settlement boundary), the presumption in favour of sustainable development should be applied and planning permission granted where the proposal constitutes a 'certain form' of development identified under 1(j) of that policy.. Furthermore, and insofar as full weight is applied, the proposals accord with the relevant policies of the Development Plan and the decision-making policies of the NPPF.

SECTION 5: PLANNING ANALYSIS – Other Amendments

Paragraph 5.36 to be amended as follows:

Overall, the proposal accords with local and national planning policy – including ~~Paragraph 109 and Paragraph 110~~ policies **TR4: Street design, access and parking**, and **TR6: Assessing transport impacts** of the NPPF...

Paragraph 5.39 to be amended as follows:

In summary, the LVIA confirms that the Site is not the subject of any statutory landscape designation. This indicates that it is not part of a **valued protected** landscape as per ~~paragraph 187~~ **policy N4: Protected Landscapes** of the NPPF.

Paragraph 5.66 to be amended as follows:

...The church's immediate and most sensitive setting is wholly unaffected, and any change to its wider landscape backdrop would be negligible. The proposals are therefore assessed as **resulting in no effect on causing no harm, or at most a negligible degree of less than substantial harm**, to the significance of the church.

Paragraph 5.67 to be amended as follows:

The site makes ~~either no contribution, or only a very limited contribution one~~, to the **setting significance** of Gate Cottage and Gate Farmhouse. The layout of the proposed development (as controlled by the parameter plan in terms of general areas of development and green infrastructure), including set-backs and areas of green space, ensures that the character of the historic village core is preserved. ~~Any harm arising, such as minor change to the wider agricultural context of Gate Farmhouse, is assessed as at the lowest end of less than substantial harm~~ The proposals are assessed as **resulting in a low degree of harm to the significance of Gate Cottage and a very low degree of harm to the significance of Gate Farmhouse**, arising principally from change to their wider agricultural context.

Paragraph 5.68 to be amended as follows:

...The ~~level of impact is~~ proposals are assessed as **resulting in a low degree of harm to the significance of the Conservation Area, a low level of less than substantial harm**, which can be further mitigated through sensitive design detailing at reserved matters stage.

Paragraph 5.69 to be amended as follows:

5.69 Overall, it is concluded that there is no harm overall to the (non-designated) Draycot Park or the Church of St James. There is **a low degree of less than substantial** harm identified to three designated heritage assets (Gate Cottage & Farmhouse, and the Conservation Area)– ~~although this is demonstrated, at worst, to be at a low level of less than substantial harm. meaning~~ **It** there is technically (albeit very limited) conflict with Core Policy 58.

Paragraph 5.70 to be deleted and replaced as follows:

In accordance with NPPF **policy HE6(3)**, the identified harm to these designated heritage assets is a matter of considerable importance and weight. In accordance with **policy HE6(4)**, this harm should be weighed against the public benefits resulting from the proposal. The identified harm is limited in degree and arises principally from change within the wider setting of the affected assets rather than from any direct effect upon their fabric or the key elements from which their significance is derived.

SECTION 6: THE PLANNING BALANCE

Paragraph 6.2 to be deleted and replaced as follows:

It has been demonstrated that the proposals can be considered a certain form of development (in accordance with national decision-making policy S5 1j) outside of the settlement boundary, to which the presumption in favour of sustainable development applies, where they make provision for housing on a site that is physical well-related to an existing settlement. Furthermore, and insofar as full weight is applied, the proposals accord with the relevant policies of the Development Plan and the decision-making policies of the NPPF

Paragraph 6.4 to be amended as follows:

The limited landscape harm identified does not substantially significantly and demonstrably outweigh those benefits, and the identified harm falls far short of this 'significant and demonstrable' bar any harm which would be necessary to warrant a refusal (under the national decision-making policies of the NPPF). The site is not identified as an 'asset of particular importance', and there are no key policies from the NPPF that would provide a clear reason for refusal. Furthermore, the NP does not contain policies and allocations to meet its identified housing requirement, and therefore paragraph 14 policy S6 of the NPPF does not apply.

Paragraph 6.5 to be amended as follows:

The tilted balance is engaged, and In applying national decision-making policies S3 and S5 of the NPPF, it is concluded that a presumption in favour of sustainable development is applied – in accordance with paragraph 11(d) of the December 2024 NPPF and that the development should be approved where the (limited) adverse effects identified do not substantially outweigh the identified benefits.

Paragraph 6.6 to be amended as follows:

The NPPF notes that "...the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner..." (paragraph 7 15). Such development is to be achieved across the three overarching objectives of sustainable development (social, economic and environmental).