



Colerne Industrial and Storage Park Planning Statement

(including Affordable Housing Statement, Statement of Community
Involvement and draft Heads of Terms)

Project Reference: 250236

Prepared for: Kemble Business Park LLP

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- Appendix 1: Airfield Documentation
- Appendix 2: Extract from the Community Consultation

Appendix 3: Skeleton CEMP
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1 Introduction

- 1.1 This Planning Statement has been prepared by Q+A Planning Ltd ('Q+A') on behalf of Kemble Business Park LLP. The Statement incorporates an Affordable Housing Statement, Statement of Community Involvement and draft Heads of Terms for a planning obligation.
- 1.2 It supports a planning application for the redevelopment of Colerne Industrial and Storage Park, Bath Road, Colerne SN14 8HT. The development description is as follows:

'Outline application (with all matters reserved except access) for the demolition of existing buildings and structures and the erection of up to 150 dwellings (Use Class C3), with associated vehicular access from Bath Road and associated works including internal estate roads (illustrative), infrastructure, open space, landscaping and other works'.

- 1.3 The purpose of this Statement is to provide details of the application proposals, describe the site and its surroundings, review the planning policies and material considerations relevant to the site, apply the relevant policy tests to the proposals, identify key benefits of the application scheme, and draw conclusions as to the site's suitability for the proposed development.
- 1.4 Detailed research and investigations have been carried out by a professional team of consultants on behalf of the Applicant. The following documents are submitted in support of the planning application in accordance with the relevant national and local validation requirements and are summarised in Table 1.1 below.

Table 1.1 Submitted Documents

Document	Author
Application Form and Certificates	Q+A Planning
Planning Statement (this document) <i>including Affordable Housing Statement, Statement of Community Involvement and draft Heads of Terms</i>	Q+A Planning
Design and Access Statement	BBA Architects and Planners
Landscape and Visual Impact Assessment	Nicholas Pearson Associates
Employment Land Review	Alder King
Transport Assessment	PEP
Travel Plan	PEP
Heritage and Archaeology Statement <i>including a Historic Buildings Assessment and Heritage Impact Assessment</i>	Bristol and Bath Heritage Consultants
Arboricultural Impact Assessment <i>Including Tree Survey</i>	Treework Environmental Practice
Preliminary Ecological Assessment	Nicholas Pearson Associates
Qualitative Obtrusive Light Statement	Light Pad
Flood Risk Assessment and Drainage Assessment	Rappor
Phase 1 Geo-Environmental Desk Study Report	Earth Environmental
Noise Impact Assessment	MACH Acoustics

- 1.5 The following drawings accompany the application:

Table 1.2 Submitted Plans

Drawing Title	Drawing Reference	Rev	For Determination / Illustrative
Location Plan	3746-2-1001	C	Determination
Site Plan – As Existing	3746-2-1002	C	Determination
Illustrative Masterplan	3746-2-1204	F	Illustrative
Built Form Parameters Plan	3746-2-1205	E	Determination
Access, Movement and Connectivity Parameter Plan	3746-2-1206	E	Determination
Illustrative Masterplan 1-5000	3746-2-1207	D	Illustrative
Proposed Site Access and Improvements to Bath Road	2169.14_R1		Determination
Illustrative Landscape and Ecology Plan	NPA 30254 XX XX DR L 1002	P02	Illustrative
Landscape and Ecology Parameters Plan	NPA 30254 XX XX DR L 1003	P01	Determination

1.6 The drawings are labelled ‘for determination’ or ‘illustrative’ based on their connection to the matters reserved for future determination.

1.7 The remainder of the Planning Statement is structured as follows:

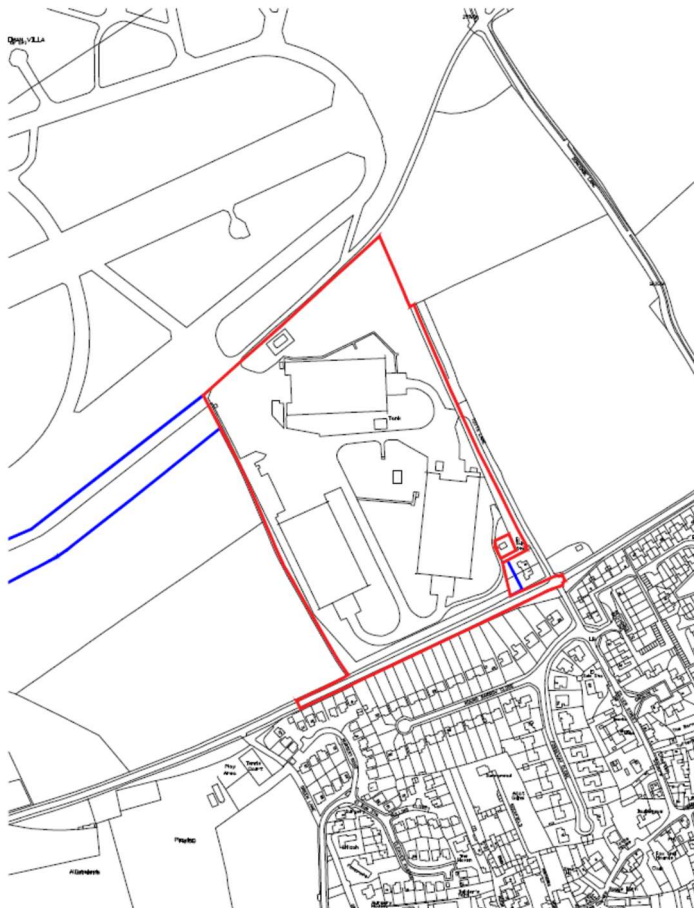
- Section 2 describes the location, characteristics and planning history of the application site and its surroundings.
- Section 3 provides the Sustainability Statement.
- Section 4 sets out the Statement of Community Involvement.
- Section 5 describes the proposed development.
- Section 6 provides the Affordable Housing Statement.
- Section 7 outlines the planning policy context, including the National Planning Policy Framework (NPPF), the development plan and other material considerations.
- Section 8 assesses the scheme against the NPPF and relevant development plan policies and demonstrates compliance.
- Section 9 presents the draft Heads of Terms for a Planning Obligation.
- Section 10 provides the overall summary and conclusions.

2 Application Site, Surrounding Area and Planning History

Application Site

- 2.1 The application site extends to 7.12 hectares and comprises three hangars (Nos. 18, 19 and 20) together with surrounding hardstanding and areas of grassland (see Figure 2.1). Approximately 44% of the site is developed either with hangars or hardstanding. Hangar 18 occupies the western part of the site, Hangar 19 is located in the north-eastern area, and Hangar 20 sits to the south-east. The hangars are large, utilitarian structures originally associated with the former airfield to the north, although they are now in private ownership.

Figure 2.1 Site Location Plan



- 2.2 The three hangars provide a combined gross internal area of approximately 14,382 sq.m. Of these, only Hangar 19 is currently occupied, on a flexible agreement outside the Landlord and Tenant Act 1954, while Hangars 18 and 20 remain vacant. Further detail on the specification of each building, together with the marketing undertaken, is set out in the Employment Land Review.

- 2.3 The site falls within the Cotswolds National Landscape (CNL) designation, alongside the remainder of Colerne Parish.
- 2.4 Immediately to the north of the site lies the former RAF Colerne (see below), while the existing village of Colerne is situated to the south, beyond Bath Road. To the east, the site is bounded by Totts Lane, with open fields beyond. At the corner of Bath Road and Totts Lane there is a pair of semi-detached houses with gardens extending to the rear. The land to the west of the site also comprises undeveloped fields
- 2.5 The land is generally flat and contains trees and shrub vegetation primarily located along the site boundaries. The tree survey forming part of the Arboricultural Impact Assessment identifies a mix of native deciduous species (Ash, Sycamore, Rowan, Norway Maple, Hawthorn and Field Maple) and non-native coniferous species (Lawson Cypress and Western Red Cedar). The trees are predominantly BS 5837 Category B and Category C. Site boundaries comprise security fencing formed of concrete posts with wire chain-link mesh and barbed wire, and sections of metal palisade fencing are also present within the site.
- 2.6 Access to the site is taken from a west–east internal road running along the perimeter of the former airfield, which connects to a priority junction with Bath Road approximately 1 km west of the site. The access road meets Bath Road at an acute angle.
- 2.7 In terms of public rights of way, the Transport Assessment identifies the following:
- Public Footpath COLE15 links the Colerne Industrial Park access road, south of the former RAF Colerne, with Bath Road approximately 110 m west of the site. South of Bath Road, the footpath continues for around 225 m along Green Lane towards Bath Road within the village.
 - Public Footpath COLE2 lies around 230 m east of the site, running north-east to meet Public Bridleway COLE49, which then continues west to join Doncombe Lane approximately 225 m north-east of the site.
 - Public Footpath COLE11 originates just east of the Colerne Industrial Park access road on Bath Road and continues south-east to meet Footpath COLE12 and the wider network of paths to the south-west of Colerne.
- 2.8 The red line boundary identifies the area of the proposed development. The blue line denotes additional land within the applicant's ownership, including the existing access and part of the gardens of the two residential properties located to the south-east of the site.

Surroundings

- 2.9 The application site is located on the northern edge of the village, and immediately south of the airfield.

Colerne Village

- 2.10 Colerne is a large village in Wiltshire, located approximately 6.5 km north-east of Bath. It forms part of Colerne Parish, which comprises three related settlements: Colerne Village, North Colerne and Thickwood. The Neighbourhood Plan estimates the population of the parish at around 3,000 residents¹.
- 2.11 Colerne High Street lies approximately 350 m to the south of the site. It accommodates shops and services, including a convenience store, post office, doctor's surgery, public houses and a café.
- 2.12 The Colerne Conservation Area is located around 120 m south of the application site at its closest point, although it is physically and visually separated from the site by 20th-century housing and the C151 Bath Road. The Heritage and Archaeology Statement records that the Conservation Area contains 84 listed buildings, all but two of which are listed at Grade II. The exceptions are the Church of St John the Baptist (approximately 470 m from the site), listed at Grade I, and Daubenys (around 250 m from the site), a medieval longhouse listed at Grade II*.

Colerne Airfield

- 2.13 Colerne Airfield lies to the north and north-west of the application site. The Heritage and Archaeology Statement records that it comprises the former runways and a large hangar associated with the RAF Aircraft Storage Unit (ASU) and Maintenance Unit (MU) constructed in 1939. The north-eastern part of the former airfield is now occupied by the Army's 21st Signal Regiment and is known as Azimghur Barracks. Three areas of housing along Doncombe Lane are excluded from the barracks and comprise a mix of privately-owned residential estates and properties leased back to the Ministry of Defence (MoD) by housing companies for service accommodation.
- 2.14 The MoD currently intends to dispose of Azimghur Barracks in 2030. Between the airfield and the barracks, at the northern edge of the airfield, lies a 4.4 ha site containing a Satellite Ground Station constructed in 1989 as part of the military's Skynet system. It is presently understood that this facility will be retained following disposal of the airfield and barracks.
- 2.15 Following the permanent closure of the aerodrome and the cessation of aviation operations at Colerne, the Aerodrome Traffic Zone (ATZ) and Flight Restriction Zone (FRZ) have been formally disestablished (i.e. removed). Documentation confirming their removal is provided at **Appendix 1**. These were previous significant constraints on earlier development proposals on this site.
- 2.16 The applicant is aware that the Defence Infrastructure Organisation (DIO) promoted the redevelopment of part of the airfield site through the previous Local Plan Review process. This promotion related to land at Azimghur Barracks, proposing up to 500 new dwellings and a new local centre following demolition and clearance of existing military buildings and facilities. For the avoidance of doubt, this promotion did not relate to the application site.

¹ Paragraph 2.1 of the Colerne Neighbourhood Plan, Part A: Development Plan

Planning History and Lawful Use

- 2.17 The site has previously been the subject of several planning applications, which are presented in Table 2.1.

Table 1.1 Planning History

Reference	Description	Status
17/11623/OUT	Outline Planning Submission for Proposed Residential Development for up to 80 Residential Units and a Care Home	Withdrawn 26/04/2018
16/01972/OUT	Outline Application for Demolition of Existing Hangars and a Residential Led Mixed Use Redevelopment (up to 136 Dwellings and 10no Retirement Homes, 1000sqm of B1 Offices and Public Open Space). All Matters are Reserved for Future Consideration with the exception of Access and Landscaping	Withdrawn 28/11/2016
14/09302/OUT	Demolition of Hangars 18 & 19 and Redevelopment to Create up to 101 Homes & 1000sqm of B1 Space	Withdrawn 05/03/2015
N/13/01567/FUL	Change of Use from B8 to Live/Work & Associated works (Renewal of 10/00444/FUL)	Approved 11/11/2013
N/11/03148/FUL	Change of Use of Former Aircraft Hangers to Residential & Commercial Use	Approved 02/04/2013
N/10/00444/FUL	Change of Use from B8 to Live/Work & Associated works	Approved 03/11/2010

- 2.18 The previous planning permissions provide context in demonstrating that a form of residential development has been accepted in principle on the site. These permissions have now expired. Accordingly, the lawful use of the site remains B8, permitting storage within the hangars and on the associated hardstanding. This forms the baseline position for the planning assessment.

Summary

- 2.19 The application site is located to the north of Colerne Village and to the south of Colerne Airfield. It extends to 7.12 hectares and comprises three hangars (Nos. 18, 19 and 20) together with surrounding hardstanding and areas of grassland. The site lies within the CNL, consistent with the wider parish. It is a brownfield site with a lawful B8 storage use, although only one of the three hangars is currently occupied under a flexible lease. The hardstanding areas can also be used intensively for open storage.
- 2.20 The site occupies a sustainable location close to Colerne village (see Sustainability Statement at Section 3), with convenient access to a range of local services. Although Colerne Airfield lies immediately to the north, the cessation of aviation activity means the site is no longer constrained by the former Aerodrome Traffic Zone (ATZ) or Flight Restriction Zone (FRZ). The promotion by the Defence Infrastructure Organisation (DIO) for development at Azimghur Barracks is entirely separate from, and unrelated to, these proposals.

3 Sustainability Statement

Introduction

- 3.1 Colerne is defined as a large village in the WCS and Core Policy 1 says that development will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Given the age of the policy, we discuss the extent to which this is up to date within our planning assessment at Section 8. However, to inform the assessment, we have provided a Sustainability Statement as it relates to access to services.
- 3.2 This Statement addresses three main aspects of sustainability:
- The provision of services within a settlement and the surrounding area;
 - Public transport accessibility to larger settlements;
 - The quality of pedestrian routes to services and public transport stops; and
 - The DfT connectivity tool.
- 3.3 These issues are each be assessed in turn as they apply to Colerne, to demonstrate the sustainability of the site.

Facilities and Services in Colerne and Surroundings

- 3.4 Colerne is well-served with facilities and services, with two local stores, and a primary school less than 400m from the site. Beyond these amenities, the village is well provided with a choice of GPs, churches and pubs, as well as a café, social club, village hall, florist and post office.
- 3.5 The Transport Assessment highlights the following local services:
- The Firs Surgery, some 160m south west of the site.
 - Colerne CoE Primary School is some 370m to the east of the site on Quarry Lane. The nearest secondary schools are The Corsham School in Corsham some 9km to the east of the site and Sheldon School some 12km east of the site in Chippenham. Wiltshire College and University Centre are also in Chippenham. There are a number of public and private schools in Bath including Ralph Allen School as well as the University of Bath.
 - A playing field, tennis courts, a children's play area, skate park and allotments are approximately 250m to the south west of the site, south of Bath Road, adjacent to Green Lane. Colerne Rugby Football Club (RFC) is some 400m south west of the site on the north side of Bath Road.
 - Colerne Village Hall is some 450m east of the site on Martins Croft. This regularly holds a number of local activities, clubs and activities for people of all ages.
 - Luckham Park country house and estate is some 1.9km north east of the site on Bath Road in Thickwood. It has a restaurant, hotel, spa and holds weddings and events. Euridge Manor is some 2km north east of the site near Thickwood and also provides hotel accommodation and holds corporate events and weddings.

- Local employment includes Azimghur Barracks and at Octavia wine services to the south west of the site adjacent to Colerne RFC. SABIS Educational Summer Camp is based at Hardwick Hall which is some 3km north west of the site to the west of Fosse Way. At Oaks Farm on Road Hill there are a number of industrial businesses including NSN Engineering Services. There are small service, leisure / tourism, agricultural and industrial businesses in The Shoe, along the A420 between The Shoe and Marshfield and in Box.
- Wiltshire Council owns the former Calder House Independent School site in Thickwood. It is now known as The Northwood Centre and will operate as a satellite campus of an existing Wiltshire special needs school.
- Further employment is at Castle Combe some 6.5km north east of the site with the Racing Circuit and The Manor House hotel as well as tourist and leisure facilities. There is a large MoD presence in Corsham and a wide range of employment opportunities in Bath and Chippenham.

3.6 We have also produced a schedule of nearby services, as shown in Table 3.1.

Table 3.1 Nearby Services

Category	Name	Approximate Distance from site
Church	Colerne Evangelical Church	0.6 km
	St John the Baptist Church	0.7 km
Shops	Bright's Village Store	0.5 km
	Colerne Stores	0.7 km
Pub	The Fox & Hounds	0.5 km
	The Six Bells Inn	0.4 km
Café	Colerne Café	0.7 km
Social Club	Colerne Liberal Club	0.5 km
Community Space	Colerne Village Hall	0.7 km
Medical Centre	Three Shires Medical Practice	0.6 km
	The Firs Surgery	0.4 km
Primary School	Colerne C of E	0.4 km
	Batheaston Primary School	5.6 km
Secondary School	St Mark's School	8.9 km
	The Corsham School	7.0 km
Outdoor Sports Facility	Colerne Recreational Grounds	0.4 km
	Colerne Rugby Football Club	0.5 km
Bus Stop	St John's Church	0.6 km
Railway Station	Bath Spa	11.0 km
Post Box	Grocyn Close	0.3 km
Post Office	Colerne Post Office	0.5 km

Connectivity to Larger Settlements

3.7 Colerne benefits from a good level of bus provision, with services to nearby settlements. The village is served by routes 228 and 636, which together provide approximately 11 stops per day in all directions. These routes also connect to larger centres including Bath and Chippenham, offering access to a wider range of facilities such as secondary schools, larger retail provision, the railway network, and additional employment opportunities.

- 3.8 Bus service 228 (Faresaver) operates between Colerne and Bath city centre approximately every two hours during the day from Monday to Saturday. The first morning service arrives in Bath at around 08:00 and also serves Ralph Allen School in Claverton Down. The final return service departs Bath at 17:30. In Bath, the service stops on Dorchester Street, within a 1–2-minute walk of Bath Spa railway station and Bath bus station, providing convenient access to a wide range of local and regional rail and bus connections.
- 3.9 Service 636 (Faresaver) operates Monday to Friday between Chippenham and Marshfield, with three services per day towards Chippenham and four services per day towards Marshfield, all stopping at Colerne. One Chippenham-bound service also serves Corsham, while two Marshfield-bound services call at Corsham. Services to Chippenham stop at Sheldon Secondary School and at Chippenham bus and railway stations, providing convenient access to a wide range of local and regional rail and bus connections.
- 3.10 Although there is no dedicated cycle infrastructure in the local area, the surrounding rural lanes are generally well-suited to cycling, being narrow, lightly trafficked, and subject to low vehicle speeds.
- 3.11 Overall, the site is well-located between Bath and Chippenham, benefitting from bus services to both settlements and good cycling access. A broad range of facilities is therefore accessible within Colerne and the wider area.

Pedestrian Access to Public Transport Stops

- 3.12 Footways are generally provided alongside local roads in Colerne, including Bath Road, High Street, Quarry Lane, Silver Street and Doncombe Lane. An approximate 1.5-metre-wide footway runs along the southern side of Bath Road between the playing field/skate park on Green Lane and Quarry Lane. A short path also links Bath Road with the playing fields and Green Lane. No footway is present on the northern side of Bath Road adjacent to the site.
- 3.13 A footway is provided on Silver Street for approximately 150 metres south of Bath Road, with a further section continuing for around 180 metres. Footways are also present on Quarry Lane and on Doncombe Lane between Bath Road and Azimghur Barracks. In addition, a footway is provided on the southern side of Bath Road between Quarry Lane and Thickwood Lane.
- 3.14 The nearest bus stops are located on Quarry Lane outside Colerne Primary School, approximately 150 metres south-east of the site. Additional stops are situated near the Church of St John the Baptist, around 550 metres to the south-east close to the village centre. These stops serve routes 228 and 636.

Connectivity Tool

- 3.15 The Department for Transport Connectivity Tool is referred to in Policy TR3 of the new NPPF in respect of locating development in sustainable locations. Part 2 of this policy states that it should be used alongside other relevant quantitative or qualitative evidence in assessing the connectivity of particular locations proposed for development.

- 3.16 The Transport Assessment refers to this in paragraph 2.6.8 and states that application site at Colerne achieves an overall connectivity score of 31, indicating a good level of sustainable accessibility for a rural village. It also reports that the village of Colerne has an overall connectivity score of 35.

Summary

- 3.17 Colerne is defined as a 'large village' and, together with its wider Parish, benefits from a strong and well-distributed level of local service provision, including shops, medical practices, community facilities, recreational spaces and a primary school, all within convenient walking distance of the application site. The village is supported by regular bus services on routes 228 and 636, providing direct connections to Corsham, Batheaston, Bath, Chippenham and Marshfield, with onward access to secondary schools, rail stations and major employment centres. Although there is no dedicated cycle infrastructure, the surrounding rural lanes offer suitable conditions for cycling, and footways along key village roads ensure safe pedestrian access to services and public transport stops. The DfT Connectivity Tool demonstrates good accessibility for both the site and the wider village and these factors confirm that the location is well-connected to facilities locally and further afield, consistent with national planning policy for development in 'large village' settlements.

4 Statement of Community Involvement

Introduction

- 4.1 Policy DM1 of the National Planning Policy Framework (NPPF) states that proposals for major development should be informed by early engagement with neighbours and the local community, as well as with the local planning authority, statutory consultees, infrastructure providers, registered providers of social housing and other relevant bodies where appropriate, to identify and seek to resolve key planning matters prior to the submission of a planning application.
- 4.2 Proposals for this site have previously been subject to extensive public engagement, and the applicant considers that the key issues raised in the past remain relevant to the current scheme. The present proposals have also been the subject of a formal pre-application enquiry.
- 4.3 This section reviews and responds to the principal issues raised through earlier proposals, identifies any matters arising from the Neighbourhood Plan, and summarises the key points from the pre-application enquiry. The masterplan has been prepared with full awareness of this feedback. Detailed justification on the planning matters raised is provided in Section 8 and this is signposted where relevant.

Previous Public Engagement

- 4.4 Attached at **Appendix 2** is an extract from the Community Consultation section of the Planning Statement that accompanied application 17/11623/OUT. Paragraph 4.6 of this document reports the following in respect of the Parish Council's response.
 - *'Happy with the principle of residential development on the site and felt this could be advanced;*
 - *Concerned about the overall density of development which needed to be clarified and justified;*
 - *Concerned about the design and appearance of the development and felt strongly that it needed a local flavour to be acceptable and did not want a standard house type;*
 - *Concerned about traffic issues;*
 - *Concerned about integration;*
 - *Wanted starter homes for younger people rather than regular social housing; and*
 - *Wanted on-going dialogue with the developer to improve the design.'*
- 4.5 It is recognised that there was a subsequent objection from the Parish Council dated 4th January 2018. In summary, these were as follows:
 - Affordable housing: concern over the use of vacant building credit.
 - Transport and access: need for a roundabout and concerns over infrastructure capacity, sewage limitations, and public transport and the suitability of Tutton Hill as a connection to the A4.

- Core Strategy: the fact that at the time Wiltshire Council could demonstrate a five year supply of housing.
- Proximity to Airfield and the safety and operational risks.
- Neighbourhood Plan and potential alternative sites.

4.6 We also noted the comments from the Neighbourhood Plan Steering Group because, at the time they were dated (January 2018), the Plan was being prepared.

4.7 Our initial response to the key issues raised previously is set out below, with further details provided in subsequent sections:

- **Residential development:** the site is previously developed land in an edge-of-village location, and Wiltshire Council cannot demonstrate a five-year supply of housing; therefore, this sort of site is a priority for residential development.
- **Affordable housing:** the concerns over Vacant Building Credit are noted, although this is a policy mechanism and the outcome of applying the policy. However, unlike previous schemes, the development still results in 17 affordable units, which is a policy-compliant level of affordable housing (see Section 6).
- **Density:** although layout is a reserved matter, the indicative masterplan has carefully considered density in the context of the significant built form already on the site and prevailing densities within Colerne. The provisional density of 21 dwellings per hectare is within the range seen in the village (15 to 33), whilst the built form onsite is a decrease from 19% to 10%.
- **Integration:** the applicant's team has carefully considered the extent to which there is connection to the village and has committed to delivering footpaths on Bath Road and facilitating connections to the wider public rights-of-way network.
- **Design and appearance:** whilst appearance is a reserved matter, the design intent summarised in the Design and Access Statement is for appearance to be influenced by local vernacular, settlement-edge character, landscape setting, and the scale and density of surrounding development.
- **Access and traffic:** a new roundabout on Bath Road is not supported by Wiltshire Council, but off-site traffic calming is proposed. Vehicular access to the site would be provided via a new simple priority junction on Bath Road, some 145m west of the Silver Street junction.
- **Infrastructure:** there is a Community Infrastructure Levy in place in Wiltshire. There may be some deductions for any in-use buildings, but the total payable will be confirmed prior to commencement of development.
- **Airfield:** following the permanent closure of the aerodrome and the cessation of aviation operations at Colerne, the Aerodrome Traffic Zone (ATZ) and Flight Restriction Zone (FRZ) have been formally disestablished (i.e. removed).

4.8 In terms of the Neighbourhood Plan, we consider this in the Section below.

Neighbourhood Plan

- 4.9 The Colerne Neighbourhood Plan 2021–2036 (CNP) was ‘made’ in March 2022. It states that, *“with due regard to all higher planning policy, the Plan expresses community aspirations for future development within the parish until 2036.”* The relevant NP policies are addressed in Sections 7 and 8 of this Statement.
- 4.10 Topic Paper 1: Site Evaluation sits alongside the CNP. Section E considers the search for developable land and generally avoids development north of the C151 (Bath Road), where the application site is located. The reasons given relate to preserving the landscape setting of Colerne village and prioritising brownfield development.
- 4.11 Section H explicitly addresses the application site and states:
- ‘One of these, known locally as the “Three Hangars” site, is a 7.5 hectare brownfield light-industry site. It has been the subject of multiple withdrawn planning applications in recent years. It is subject to safeguarding restrictions imposed by the adjacent MoD Satellite Ground Station (SGS), which are likely to remain. It was contended in response to previous applications that intensive residential redevelopment of this site would be out of scale with and destroy the character of the old village by an over-sized addition, and that its development could set up a ‘domino effect’, damaging the preservation of this green strip as a whole.’*
- 4.12 The Annex includes a site assessment covering the application site. This refers to the SHELAA (2017) conclusion that the land was *“developable in the long term”* and provides a series of technical local assessment considerations.
- 4.13 In response to the key issues raised:
- **Access:** It is agreed that access should be taken from the C151, and this forms part of the proposal.
 - **Landscape:** Landscape effects are addressed through a detailed Landscape and Visual Impact Assessment.
 - **Ecology:** All required ecological surveys have either been completed or are underway, and appropriate mitigation is incorporated within the masterplan.
 - **Settlement Pattern:** While comments on the settlement edge are noted, this is a substantial brownfield site with characteristics distinct from other land north of the C151. The proposed design and proposed connections enable a natural extension to the village within a generous landscape setting.
 - **Satellite Ground Station:** Development is set away from the northern boundary. Previous advice from the MoD confirms that two-storey buildings of traditional construction would not conflict with safeguarding requirements, although tree heights will need to be managed. This is not considered a constraint to development.
- 4.14 The planning policy considerations raised in the CNP are addressed in Sections 7 and 8.

Pre-Application Enquiry

4.15 A pre-application enquiry was submitted to the Council in 2025, and a written response (together with consultee comments) was issued on 13 November 2025. The applicant's design team has carefully tracked and responded to the matters raised. However, since that time Wiltshire Council has withdrawn its emerging Local Plan, rendering certain elements of the pre-application advice out of date. The key statutory and policy considerations are assessed in detail in Sections 7 and 8.

4.16 An important conclusion from this advice was as follows:

'However, much as the CNP Part A sets out there is a need to be agile to changing circumstances in particular around the adjacent MoD land. In my opinion, the land between that and the C151 (including this site) ought to be considered within that same plan-led, masterplanned approach in collaboration with the local community'.

4.17 In response to this suggestion:

- The need to remain agile to changing circumstances is noted.
- The indication that development north of the C151 could be considered is also noted, subject to the usual qualifications.
- Since the advice was issued, the draft Wiltshire Local Plan has been withdrawn and the new Plan has only just commenced preparation.
- The site is not part of MoD land and is in entirely separate ownership.
- The emerging proposals referenced in previous representations by the DIO to the draft Local Plan relate to other landholdings and are not connected in any way to the application site.
- This is confirmed in the CNP Topic Paper 2: A Concept Statement for the MoD Estate which relates to housing opportunities in the North Colerne area on the Azimghur Barracks site.

4.18 Accordingly, while the suggestion is acknowledged, it does not represent a justified or practical option for this site. The application site is in single ownership and can be delivered independently without reliance on third parties, whereas the land referenced above is not connected in any way to the application site and is within a different part of the Parish.

Summary

4.19 The applicant has previously engaged extensively on the future of this site. Despite sustained marketing and letting exercises (see Section 8 and the Employment Land Review), the site has not proved to be a successful employment location. It is a brownfield site, and Wiltshire Council is currently unable to demonstrate a five-year supply of housing. The land also lies immediately adjacent to the settlement boundary and is well connected to the village centre. These factors collectively indicate that the site is a priority location for residential development, subject to meeting the necessary statutory and planning policy tests.

- 4.20 The applicant's team has been cognisant of previous feedback on earlier development proposals and, where possible, has reflected this within the emerging design, recognising the outline nature of the application. This feedback has also informed the scope and depth of the supporting evidence. The roundabout access solution, which had strong local support, was not endorsed by Wiltshire Council's highways department at pre-application stage. It would also require more intrusive engineering works, reduce opportunities for tree retention, and potentially result in landscape impacts within the National Landscape. For these reasons, it could not be incorporated.
- 4.21 It is acknowledged that there are local concerns regarding the extension of the village north of the C151. While the proposal would introduce new housing in this location, the site already contains substantial built development immediately adjacent to the village boundary, albeit currently without any functional connection to the village. Neighbouring land parcels do not share the same level of existing development and would need to be assessed on their own merits. The suggestion that this site should be considered alongside other landholdings is not reasonable, and the application site can be delivered independently without reliance on third parties.
- 4.22 Overall, it is considered that the key issues have been addressed, and the applicant remains open to ongoing dialogue with the Parish Council and the wider community regarding the future of this previously developed site.

5 Proposed Development

Introduction

- 5.1 In this Section, we explain the proposed development. The description of development is as follows:

‘Outline application (with all matters reserved except access) for the demolition of existing buildings and structures and the erection of up to 150 dwellings (Use Class C3), with associated vehicular access from Bath Road and associated works including internal estate roads (illustrative), infrastructure, open space, landscaping and other works’

- 5.2 Other than the drawings relating to the point of access to the development, all other matters are reserved for future determination. However, a series of parameter plans have been submitted for determination, enabling the anticipated development envelope to be assessed.
- 5.3 This section, with reference to the Design and Access Statement, explains the approach to the illustrative layout, the fixed development parameters, access and movement, and landscaping.

Illustrative Masterplan

- 5.4 As set out in the Design and Access Statement, the Illustrative Masterplan (see Figure 5.1 overleaf) has been prepared to demonstrate a potential approach to accommodating up to 150 dwellings on the site, alongside supporting green infrastructure, sustainable drainage features, biodiversity enhancements, public open space, and appropriate vehicular and pedestrian access arrangements.
- 5.5 The Illustrative Masterplan has evolved in response to the site analysis work, landscape considerations, and pre-application feedback received from Wiltshire Council. Particular attention has been given to the relationship between the proposed development and the surrounding landscape setting, the retention and reinforcement of green infrastructure, ecological considerations, and the transition between the settlement edge and the wider countryside.
- 5.6 The principal vehicular access is proposed from Bath Road to the south of the site, and this element of the scheme is submitted in full. An internal layout is also presented, together with development parcels. The movement routes shown within the Illustrative Masterplan are indicative only and will be refined through the Reserved Matters process. The indicative layout demonstrates how up to 150 dwellings could be accommodated, with an indicative distribution as shown in Table 5.1.

Table 5.1 Indicative Mix of Residential Accommodation

	No.	%
2 Bed	44	29.3
3 Bed	87	58.0
4 Bed	19	12.7
Total	150	

Figure 5.1 Indicative Masterplan

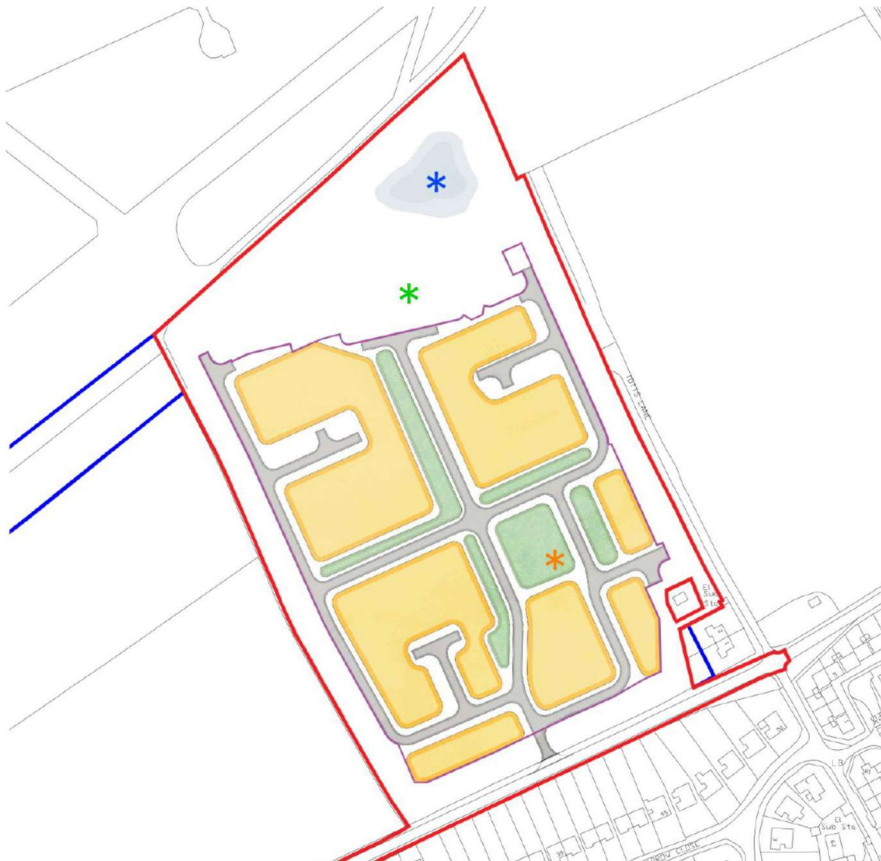


- 5.7 The Design and Access Statement demonstrates that the adjacent residential character areas typically range between approximately 15 and 33 dwellings per hectare. The application site extends to approximately 7.1 hectares and occupies a transitional position between the village edge and the wider former airfield landscape. The proposed scheme would have a density of approximately 21 dwellings per hectare gross, which is judged as appropriate in the context of an edge of settlement brownfield site.

Parameters

- 5.8 Alongside the illustrative masterplan is a built form parameter plan (see Figure 5.2), which defines the developable area and provides expected areas of built form, access roads and public open space within those areas and is informed by the illustrative masterplan. The extent of the developable area is approximately 4.5 hectares, with a generous landscaped area included on the site perimeter and to the north.
- 5.9 The parameter plan sets a maximum ridge height of 9.5 metres above ground level (or two storeys) for the residential development.
- 5.10 The reserved matters would confirm the layout, scale, appearance and landscaping within these parameters. This is presented as single-phase development.

Figure 5.2 Parameters Plan



Landscape and Ecology Parameter Plan

5.11 The submitted Landscape and Ecology Parameter Plan identify the key measures incorporated within the scheme to avoid, minimise, and mitigate adverse effects, whilst securing landscape and ecological enhancements. Key elements comprise:

- Existing Trees and Tree groups to be retained and protected in accordance with BS.5837.
- Existing scrub to be retained and protected in accordance with the recommendations of the ecological appraisal.
- Proposed no-build landscape and ecology buffers (minimum 10m wide), with lighting controlled to avoid unacceptable light spill.
- Proposed biodiverse/ species rich grassland habitat (target calcareous grassland), including within Sustainable urban drainage (SUDs) feature, as part of open area of landscape.
- Proposed above ground SUDs attenuation feature.
- Provision for a dedicated bat building, subject to detailed ecological requirements.
- Proposed tree lined streets.

- 5.12 All retained vegetation will be protected during construction and incorporated into the long-term landscape management strategy for the development.

Transport and Accessibility

- 5.13 Vehicular access to the development is proposed via a simple priority junction on the C151 road. This element is submitted in full and considered to be appropriate given the anticipated level of use; appropriate visibility splays will be ensured. Elsewhere, the road will be improved with two new pedestrian crossings and a new footway on the north side. This will ensure pedestrian access to both the primary school and the village beyond. An Access, Movement and Connectivity Parameter Plan is also provided.
- 5.14 Additional active travel routes are also proposed to the north and the east, which will connect the site to the public right of way network, via Totts Lane and the access road to the south of the airfield. Discussions with the council have indicated that vehicular access along Totts Lane may be restricted, allowing for a traffic-free link to Silver Street and the village centre.
- 5.15 In addition, the illustrative movement strategy identifies the potential for a wider recreational and connectivity route linking existing public rights of way to the west of the site with routes surrounding Doncombe Lane and the wider countryside

Summary

- 5.16 The Illustrative Masterplan shows how up to 150 dwellings can be accommodated on the 7.1 hectare site, supported by green infrastructure, SuDS, biodiversity enhancements, public open space and appropriate access arrangements. Its form responds to site analysis, landscape considerations and pre-application feedback, ensuring a sensitive transition between the village edge and the wider countryside. The indicative mix and resulting density of around 21 dwellings per hectare align with the character of nearby residential areas.
- 5.17 A built-form parameter plan defines a developable area of approximately 4.5 hectares, supported by generous landscaped buffers and a maximum ridge height of 9.5 metres. Landscape and ecology measures include retained vegetation, 10-metre ecological buffers, biodiverse grassland habitats, above-ground attenuation, a dedicated bat building and tree-lined streets, all secured through long-term management.
- 5.18 Access will be taken from Bath Road via a priority junction, with improved pedestrian infrastructure including new crossings and a footway to the primary school and village. Additional active travel links will connect the site to the public rights of way network, with potential restrictions on Totts Lane enabling a traffic-free route to Silver Street. A wider recreational and connectivity route is also identified, linking rights of way west of the site with routes around Doncombe Lane.

6 Affordable Housing Statement

- 6.1 Core Policy 43 of the WCS requires that at least 30% (net) affordable housing be provided within the 30% affordable housing zone, in which the application site is located. Policy HO8(4) of the NPPF states:

‘Where development proposals include the reuse or redevelopment of vacant buildings, any affordable housing contributions which are due should be reduced by a proportionate amount, equivalent to the gross floorspace of the existing building or buildings. This does not apply to vacant buildings which have been abandoned, or to major development on land within or released from the Green Belt (to which the requirements in policy GB8 apply).’

- 6.2 This is known as Vacant Building Credit (VBC).

- 6.3 There is no Core Strategy policy on the application of VBC in Wiltshire. Therefore, VBC applies to the policy as an important material consideration. The planning practice guidance states at Paragraph: 027 Reference ID: 23b-027-20190315:

‘Where there is an overall increase in floorspace in the proposed development, the local planning authority should calculate the amount of affordable housing contributions required from the development as set out in their Local Plan. A ‘credit’ should then be applied which is the equivalent of the gross floorspace of any relevant vacant buildings being brought back into use or demolished as part of the scheme and deducted from the overall affordable housing contribution calculation. This will apply in calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided.

The existing floorspace of a vacant building should be credited against the floorspace of the new development. For example, where a building with a gross floorspace of 8,000 square metre building is demolished as part of a proposed development with a gross floorspace of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought.’

- 6.4 Paragraph: 028 Reference ID: 23b-028-20190315 states that the vacant building credit applies where the building has not been abandoned. The two vacant hangars have not been abandoned and as evidenced in the Employment Land Review, there have been extensive attempts at securing new occupiers. We note the following from the evidence:

- The buildings are vacant, redundant and extensively marketed, and there is clear evidence they have not been abandoned. Despite ongoing investment and refurbishment, they are no longer capable of attracting sustained employment use.
- The marketing record shows aborted lettings, short-term leases, intermittent occupation, long-term marketing activity, and extensive engagement with prospective occupiers.
- The evidence demonstrates prolonged and active marketing, continued investment, and that the persistent vacancy reflects a lack of sustained occupier demand, rather than any strategy ahead of redevelopment.

6.5 Therefore, VBC applies to this development.

6.6 Since this is an outline application, the precise VBC calculations would need to be applied at Reserved Matters stage as it is reliant on the total proposed residential floorspace. However, indicative calculations can be undertaken to inform the expected affordable housing provision.

6.7 The inputs are as follows:

- Existing Vacant Buildings (2 out of the 3 hangars): 8,402 sq.m GIA
- Proposed Residential Floorspace (indicative): 13,060 sq.m GIA

6.8 We can apply this information to the VBC calculation

- Difference: 13,060 sq.m GIA (proposed) - 8,402 sq.m GIA (vacant buildings) = 4,658 sq.m
- Difference as a proportion of proposed: 4,658 sq.m GIA / 13,060 sq.m GIA = 0.3566 (or 35.66% of the policy requirement)
- Reduction calculation: $0.3566 \times 30\% = 0.106998$ or 10.70%

6.9 Therefore, 10.7% of 150 residential units equates to 16.05 affordable units. This would be rounded up to 17 units. Therefore, the proposal is for up to 17 affordable units out of the total maximum of 150 residential units. This is reflected in the indicative mix between market and affordable at Table 6.1.

Table 6.1 Indicative Market and Affordable Housing Mix

	Market	Social, Affordable or Intermediate Rent	Total	%
2 Bed	39	5	44	29.3
3 Bed	77	10	87	58.0
4 Bed	17	2	19	12.7
Total	133	17	150	

6.10 At this outline stage, the affordable mix is indicative.

6.11 Reflecting the pre-application advice:

- 60% of the units (10 units) will be being for Affordable Rented housing,
- 40% of the units (7 units) being provided for Affordable Home Ownership that could comprise of Shared Ownership and First Homes.

6.12 The precise tenure split will be agreed with the Council's Housing Enabling Team at Reserved Matters stage alongside the details and distribution of the affordable housing units, reflecting the design guidance.

- 6.13 Pre-application advice sought the inclusion of 1-bed affordable units. While the precise mix is not for determination at outline stage, it is entirely possible to adapt some of the indicative 2-bed affordable homes to 1-bed units subject to feedback from the Registered Provider. These are expected to be houses rather than flats or maisonettes, reflecting the prevailing character of the area.
- 6.14 In accordance with planning policy, the affordable dwellings (other than any First Homes) will be transferred to a Registered Provider approved by the Council, or to the Council itself, on a nil-subsidy basis.

7 Planning Policy

Introduction

- 7.1 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990, the relevant development plan comprises:
- Wiltshire Core Strategy (2015)
 - Wiltshire Housing Site Allocations Plan (2020)
 - Saved Policies of the North Wiltshire Local Plan (2011)
 - Colerne Neighbourhood Plan (CNP) 2021-2036
- 7.2 Relevant material considerations include national policy, namely the National Planning Policy Framework (NPPF), together with any applicable supplementary planning documents. This Planning Statement therefore assesses the application proposals in the context of the relevant planning policy framework and all other material considerations

Development Plan

Wiltshire Core Strategy (2015)

- 7.3 The Wiltshire Core Strategy (WCS) was adopted in January 2015 and sets out the Council's spatial vision, key objectives, and overall principles for development in the county. An extract from the Policies Map is set out at Figure 7.1 below.

Figure 7.1 Extract from Policies Map



Notes: Wiltshire Interactive Policy Map with layers from WCS and Saved Policies from the North Wiltshire Local Plan switched on. Ste boundary is approximate, please refer to submitted Site Location Plan for precise boundary.

7.4 The site is located immediately adjacent to the Settlement Framework Boundary of Colerne (black edge) and within the Colerne Affordable Housing Zone (yellow overlay). The site is also located within the Cotswold Area of Outstanding Natural Beauty (AONB), now known as the National Landscape.

7.5 Core Policy 1 sets out the overall settlement strategy for Wiltshire and identifies settlements on a tiered basis, highlighting where future growth should be located and the form it should take. Colerne is defined as a large village and states that large villages are defined as settlements with a limited range of employment, services and facilities. In terms of development, it 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’

7.6 Paragraph 4.15 states that *‘at Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries’*.

7.7 Core Policy 2 sets out the delivery strategy for Wiltshire, which seeks to provide at least 42,000 homes over the plan period. Of these, a minimum of 24,740 homes is to be provided within the North and West Wiltshire housing market area. Table 1 provides an indicative housing requirement for the ‘Corsham remainder’ of 175 new dwellings in Corsham Community Area, as defined by Core Policy 11. It also states that:

‘This will be delivered in a sustainable pattern in a way that prioritises the release of employment land and the re-use of previously developed land to deliver regeneration opportunities, and to limit the need for development on Greenfield sites, with approximately 35% of development taking place on previously developed land.’

7.8 For sites within the limits of development, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages. Except in the circumstances permitted by other policies referred to in paragraph 4.25, the policy states that development will not be supported outside the limits of development. One of the relevant exceptions is Core Policy 37 relating to Military Establishments.

7.9 The application site is not in MOD ownership and, although it formed part of a former Military Establishment, the hangars have long since been in commercial use. Wiltshire Council has applied this policy to analogous sites, although the pre-application advice for this site questioned whether it was appropriate to do so. Notwithstanding this, the policy raises several broad planning considerations that are relevant to the proposals, including the relationship to the existing settlement in terms of location and scale, and matters relating to building footprint and floorspace. These issues are addressed further within the planning assessment at Section 8.

- 7.10 Core Policy 11: Spatial Strategy for the Corsham Community Area and this defines that over the plan period (2006 to 2026), approximately 1,395 homes will be provided, of which about 1,220 should occur at Corsham. Approximately 175 homes will be provided in the rest of the Community Area. It also states that:

‘Growth in the Corsham Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.’

- 7.11 The policy also states that development proposals in the Corsham Community Area will need to demonstrate how the relevant issues and considerations listed in paragraph 5.62 will be addressed. Paragraph 5.62 sets out a series of specific planning issues for the Corsham Community area. Most of these are specific to Corsham, but there is a reference to the re-use of redundant MoD sites, the need for developer contributions and transport assessments. The final sentence of the third bullet point states that:

‘All major development sites coming forward in the wider Corsham area must clearly demonstrate that the proposal will be well integrated into the existing settlements and enhance the character of the area. A masterplan should be prepared for each site in conjunction with the community’

- 7.12 The final two bullet points are relevant to the application site, as follows:

- *‘all development within the Community Area will need to conserve the designated landscape of the Cotswolds Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics*
- *all development will maintain the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation, having particular regard to the Wiltshire Bats SAC Guidance’*

- 7.13 The application site is an existing employment site, albeit only one of the three hangars is occupied. Core Policy 35: Existing Employment Sites safeguards Principal Employment Areas and sets assessment criteria for the redevelopment of sites last within employment use within Principal Settlements, Market Towns, Local Service Centres and Principal Employment Areas. Since this site is not within a settlement or Principal Employment Area, strictly speaking this policy would not apply although we note there is a Neighbourhood Plan policy that also addresses employment uses. Contextually part v. is relevant that states:

‘v. There is valid evidence that the site has no long term and strategic requirement to remain in employment use; the ability of the site to meet modern business needs must be considered, as well as its strategic value and contribution to the local and wider economy both currently and in the long term. It must be shown that the site is no longer viable for its present or any other employment use and that, in addition, it has remained unsold or un-let for a substantial period of time (at least 6 months), following genuine and sustained attempts to sell or let it on reasonable terms for employment use, taking into account prevailing market conditions.’

- 7.14 We have reviewed all other planning policies in the Core Strategy, considering pre-application advice. We note the following are relevant:

- CP3: Infrastructure Requirements – this requires that all new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Infrastructure requirements will be delivered directly by the developer and/or through an appropriate financial contribution prior to, or in conjunction with, new development.
- Core Policy 41: Sustainable Construction and Low Carbon Energy – this requires that new development will be encouraged to incorporate design measures to reduce energy demand and sets out a requirement for a Sustainable Energy Strategy outlining the low-carbon strategy for the proposal.
- Core Policy 43: Providing Affordable Homes – this requires that on sites of five or more dwellings, affordable housing provision of at least 30% (net) will be provided within the 30% affordable housing zone.
- Core Policy 45: Meeting Wiltshire's Housing Needs – this requires that new housing, both market and affordable, must be well designed to address local housing need incorporating a range of different types, tenures and sizes of homes to create mixed and balanced communities
- Core Policy 50: Biodiversity and Geodiversity – this requires that development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale, that all development should seek opportunities to enhance biodiversity and that sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment.
- Core Policy 51: Landscape – this requires that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. It also states that proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas.
- Core Policy 55: Air Quality – this states that development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity.
- Core Policy 56: Contaminated Land – this requires that development proposals which are likely to be on or adjacent to land which may have been subject to contamination will need to demonstrate that measures can be taken to effectively mitigate the impacts of land contamination on public health, environmental quality, the built environment and amenity

- Core Policy 57: Ensuring High Quality Design and Place Shaping – this policy states that a high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. In respect of major developments, xiii expects applications to be accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place.
- Core Policy 58: Ensuring the conservation of the historic environment – the policy states development should protect, conserve and where possible enhance the historic environment. It also states that distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.
- Core Policy 60: Sustainable Transport – this states that the council will use its planning and transport powers to help reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire.
- Core Policy 61: Transport and Development – this states that new development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives.
- Core Policy 62: Development Impacts on the Transport Network – this states that Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages
- Core Policy 64: Demand Management – this states that demand management measures will be promoted where appropriate to reduce reliance on the car and to encourage the use of sustainable transport alternatives.
- Core Policy 67: Flood Risk – this states that all new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.
- Core Policy 68: Water Resources – this states that development must not prejudice the delivery of the actions and targets of the relevant River Basin or Catchment Management Plan, and should contribute towards their delivery where possible

Wiltshire Housing Site Allocations Plan 2020

- 7.15 The Plan does not make any allocations for the Corsham Community Area (which includes Colerne). However, its appendices define boundaries for all settlements in the county.

Saved Policies of the North Wiltshire Local Plan 2011

- 7.16 The North Wiltshire Local Plan 2011 was adopted in June 2006, setting out the spatial strategy for the District at that time. On the 27th of June 2009, the Secretary of State issued a direction setting out the policies within the North Wiltshire Local Plan 2011 that can be 'saved' beyond this date. Many of its policies have since been replaced by the WCS and Paragraph 232 of the NPPF states that policies that were adopted or made prior to the publication of the Framework should be given due weight to their degree of consistency with it (i.e. the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).
- 7.17 Accordingly, given that the saved policies of the North Wiltshire Local Plan predate the NPPF by some margin, it is considered that they would carry limited weight in relation to the proposal. The pre-application advice has identified the following policies as relevant to the application proposal.
- NE14 Trees, Site Features and the control of development – this states that Permission will not be granted for proposals that would result, or be likely to result, in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features that could be successfully and appropriately incorporated into the design of a development.
 - NE18: Noise and Pollution - development will only be permitted where it would not generate, or itself be subject to, harm upon public health or cause pollution to the environment by the emission of excessive noise, light intrusion, smoke, fumes, other forms of air pollution, heat, radiation, effluent or vibration
 - T5: Safeguarding - Development affecting public rights of way, cycle and pedestrian routes will only be permitted where satisfactory provision, in terms of safety, attractiveness and convenience, is made to retain or divert the existing or proposed route.
 - CF3: Provision of Open Space - proposals for new housing development will be required to make provision for open space on site, to provide 15m² for Local Parks and 3m² for play areas per person.

CNP 2021-2036

- 7.18 The CNP (CNP) was made in March 2022 and covers the period 2021–2036. It is presented in two parts: Part A (Development Plan) and Part B (Design Statement). As a 'made' neighbourhood plan, it forms part of the development plan. Being more recent than the WCS, any conflict between the two must be resolved in favour of the policy contained in the later document, in accordance with Section 38(5) of the Planning and Compulsory Purchase Act 2004 (as amended).
- 7.19 The CNP is supported by two topic papers: Topic Paper 1 (Site Evaluation) and Topic Paper 2 (A Concept Statement for the MoD Estate). These documents do not constitute policy but provide background material relevant to the interpretation of CNP policies. Topic Paper 2 does not apply to the application site.
- 7.20 The CNP covers the whole of Colerne Parish, including the Village of Colerne, North Colerne and Thickwood, with an approximate population of 3,000 (paragraph 3.2 of the CNP). Understanding the role and function of the wider parish is important, as it relates directly to the overall sustainability of the area. Paragraphs 2.17 and 2.18 states:

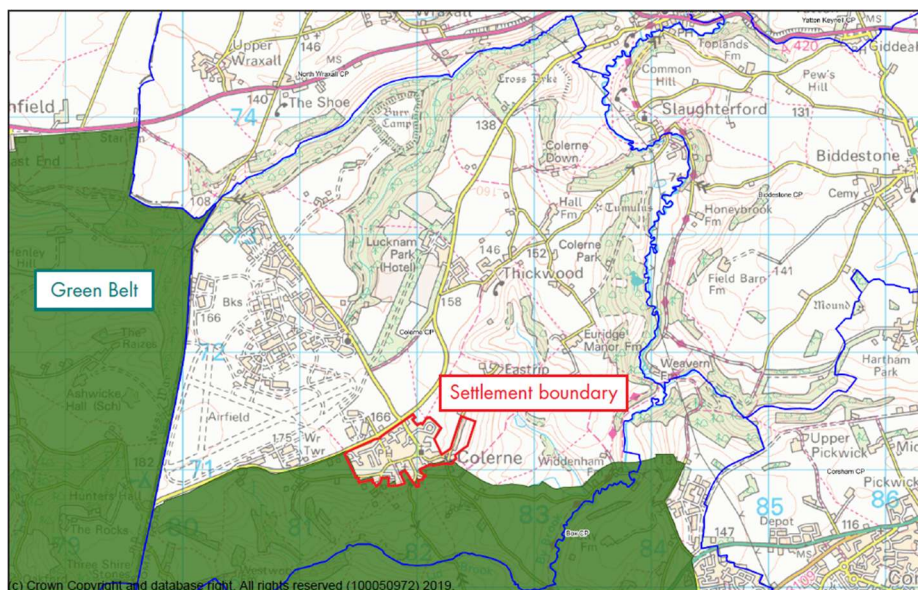
'The parish is well-served by community facilities such as the Primary School, two GP Surgeries, some small shops, four pubs or social clubs, two sports fields and play-parks and a Village Hall. These, together with many groups supporting recreational and social activities, help to keep the community alive, welcoming and vibrant.'

'Centred on a true English village in spirit, character and history, the parish of Colerne is now a large community of about 3,000 but still comprises a working village and environs -- not just residential, not just retirees, not a 'second-home ghetto', but enlivened by working folk, young families and their activities.'

7.21 Paragraph 3.7 of the CNP states that the Plan has adopted an indicative forecast for the Plan Period Housing Need of 35-40 dwellings. Paragraph 3.2 sets out a series of community preferences including preference for smaller scale developments (less than 25 houses). However, this is not a policy. There is also strong support for the Plan's development principle of 'brownfield over greenfield'.

7.22 Section 3. Part iii of the CNP includes current land availability constraints.

Figure 7.2 Extract from Page 15 from the CNP



7.23 Paragraph 3.15 then states the following:

'The Settlement Boundary is in turn bordered entirely by Green Belt or greenfield agricultural land with the exception of one ex-RAF hangar site (now an industrial storage complex) which is not deemed developable for residential for reasons outlined in Topic Paper #1'

7.24 This paragraph explicitly relates to the application site and acknowledges that it is the brownfield site closest to the settlement boundary and located outside the Green Belt. The concerns identified regarding residential development relate primarily to its scale and its potential impact on the character of the village, as well as the perceived precedent it may set. These comments from Topic Paper 1 have been addressed within the Statement of Community Involvement. In addition, it is considered that there has

been a significant change in circumstances since the CNP was prepared, which is relevant to the conclusions reached. This matter is assessed further in Section 8.

- 7.25 At paragraph 3.30, the CNP identifies the strategic positioning for the Plan which states at parts 3 and 4:

‘3. to retain the integrity of the central village by keeping its current settlement boundary, this being a sustainable proposition in light of future brownfield potential;

4. recognition of a potential requirement to revise this Plan on the adoption of the Local Plan Review (2023) and/or as a result of emerging MoD land disposal plans.’

- 7.26 Under Section 4 (i) Planning Themes, there is an objective to preserve current land usages north of the C151 and paragraph 4.2 states that there is *‘The objective of preserving the identity of the old village could be jeopardised by the apparent availability of developable land between the airfield and the C151’*.

- 7.27 Under Section 4(ii), paragraph 4.21 sets a vision that *‘the corridor of existing greenfield and light industry to the north of the village has retained current usages dedicated to agriculture, recreation and employment’*. This also relates to the CNP aim to preserve the status quo in respect of the application site.

- 7.28 Paragraph 4.22 sets out nine objectives that give practical effect to the vision. While all nine have some relevance to the application site, the first three are particularly pertinent:

‘1. To ensure that development is sympathetic with the landscape and agricultural character of the parish and the Cotswolds National Landscape; and with the character of its varied built environments [NE1-4 and Design Statement];

2. To ensure that housing development maintains the community’s demographic and economic balance, encourages community coherence, fosters integrated community growth, and retains proportionality for the village and its hinterland [BE3,5];

3. To encourage the provision of housing aimed at identified local needs, and on a scale that does not overwhelm the existing settlements [BE3 i, iv];’

- 7.29 Turning to the policy themselves, we note following are relevant:

- Policy BE1: Character and design – this policy requires developments to achieve high-quality, context responsive design by positively addressing the National Model Design Code and the Colerne Design Statement, respecting surrounding character in form, height, materials and massing.
- Policy BE2: Heritage – this states that when considering the impact of a proposed development on the significance of a designated heritage asset as set out in the Colerne Historic Environment Record, great weight should be given to the asset’s conservation

- Policy BE3: Housing policy – this policy requires housing developments to provide a mix of homes that meet local needs across all age and income groups, deliver affordable housing through recognised tenure routes where required, and are particularly supported where they achieve this on previously-developed land
- Policy BE5: Sustainable Design and Construction – this policy states that development should maximise practicable energy efficiency while remaining consistent with local character and reduce energy demand and incorporate on-site renewable energy generation, where appropriate.
- Policy NE1: Landscape and Natural Environment – this policy states that future development must maintain open rural landscape gaps between Colerne and neighbouring settlements to retain the parish's overall landscape character. Development will only be supported where it complies with the Bat SAC Planning Guidance and avoids adverse effects on European sites, core roosts and associated sensitive habitat.
- Policy NE2: Green Infrastructure and Biodiversity – this policy states that development must demonstrate a positive and sensitive response to green infrastructure and biodiversity and delivering a minimum 10% biodiversity net gain on-site or, where impracticable, nearby. It also states that proposals will only be supported where they comply with the Bat SAC Planning Guidance and avoid adverse effects on European sites, Core Roosts, and functionally linked habitats
- Policy NE4: Key Views – this policy states that the scale, layout, and massing of development proposals should be designed to respect and, where practicable, to enhance an affected Key View as shown in the details of the policy and the Key Views Report (the application site is only partially visible from View 2, see Figure 7.3).
- Policy EB1: Existing and Future Employment Opportunities – this policy states that the repurposing of land and buildings currently used for employment will not be permitted unless evidence is produced to show that redevelopment for alternative employment use is not possible or viable. Policy EB1 therefore effectively accepts that there will be circumstances where the repurposing of land and buildings currently used for employment purposes is appropriate, subject to adequate justification.
- Policy SE2: Electrical charging points – this policy requires that all new houses where dedicated parking is provided should have an appropriately located charging point
- Policy SE3: Lighting schemes – this policy requires that development must show how it will minimise light pollution by reducing sky glow, glare and light spill, and by controlling light intensity, spectrum and duration of use. Proposals should also demonstrate that lighting has been designed to optimise energy efficiency
- Policy CHWB3: Walking and cycling – the policy states that new or rerouted public footpaths and cycleways should be aligned sensitively with landscape and wildlife corridors, and development adjoining Public Rights of Way should provide appropriate links to them. All new routes must be designed to be as accessible as feasibly possible for all users.

Figure 7.3 Key View 2 from CNP



Supplementary Planning Documents

7.30 As part of the production of the supporting documentation, the applicant's wider team have considered the following guidance, where appropriate to an outline planning application,, including:

- Wiltshire Planning Obligations Supplementary Planning Document – Adopted May 2015
- Waste Storage and Collection: Guidance for Developers Supplementary Planning Document –November 2016 (latest published update 2020)
- Wiltshire Air Quality Strategy Supplementary Planning Document – March 2019
- Bath and Bradford on Avon Bats Special Area of Conservation: Planning Guidance for Wiltshire – August 2020
- Wiltshire Design Guide – Adopted October 2023
- Cotswolds National Landscape Management Plan 2025–2030 –March 2024
- Art and Design in the Public Realm: Guidance for Wiltshire - 2024

Emerging Development Plan

7.31 The previous emerging Wiltshire Local Plan was withdrawn from examination on 22nd May 2026 following a decision on 19th May 2026 due to '*significant soundness concerns*' on the Plan from the Inspectors examining the Plan, including strategic level concerns.

- 7.32 Wiltshire Council announced on 30th June that in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2026, Wiltshire Council is preparing a new local plan. The Council has launched a Call for Sites exercise which runs between 9th July and 30th September 2026. The applicant has put forward the application site for consideration in this exercise.
- 7.33 The Council have also commenced consultation on the scope of the Local Plan, which runs until 30th September 2026. This exercise includes a Baseline Survey of Area (2026-2045) and as part of the Social Baseline, this sets out a minimum housing need of 3,463 per year.
- 7.34 The key dates are for the 30 month process to start from October 2026, with consultation in April 2027 and then March 2028 with the Plan submitted to examination in October 2028 and adoption in April 2029.

National Planning Policy Framework

- 7.35 The Government published a revised National Planning Policy Framework (NPPF) in August 2026. It sets out the government's policies for plan-making and for making decisions on development proposals in England. Paragraph 1 of Chapter says that it is a material consideration of critical importance. The NPPF includes a series of national decision-making policies and Annex A states that these policies must be taken into account in decision-making from the day of its publication.
- 7.36 Paragraph 3 says the national decision-making policies in the NPPF are a material consideration in making decisions and should be read alongside the policies in the development plan. It also states that planning decisions must also reflect relevant international obligations and statutory requirements.
- 7.37 Paragraph 7 states that the national decision-making policies should also be read as a whole (including relevant footnotes and annexes) and explains that some of these policies 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.
- 7.38 The development plan covering the application site is out of date and the Council cannot demonstrate a five-year supply of deliverable housing sites. As a result, the national decision-making policies in the NPPF carry significant weight. We summarise the policies as they apply to the application.

Chapter 4: Decision-making policies

- 7.39 Chapter 3 of the NPPF provides a set of general decision-making policies which should be read with the rest of the thematic policies in the other chapters. The relevant policies to this application are as follows:

- **Policy DM1: ‘Preparing development proposals’.** This policy states that Major developments are expected to undertake proportionate early engagement with communities, the planning authority and relevant consultees, and to submit a concise planning statement explaining policy compliance, how the scheme has evolved through engagement, and any proposed planning obligations. All other development should provide only the minimum information needed for a decision, with pre-application discussions required where indicated in the NPPF or where proposals raise complex issues such as heritage impacts.
- **Policy DM3: ‘Determining development proposals’.** DM3 states that when considering development proposals, local planning authorities are expected to work positively and proportionately with applicants, focusing on the scale and complexity of the proposal, taking account of pre-application engagement, consulting statutory or internal bodies only where necessary, and seeking solutions (through conditions or obligations) where these can make a development acceptable.
- **Policy DM6: ‘Use of planning conditions and obligations’.** This policy states that planning conditions should only be imposed where they are necessary, relevant, precise and reasonable, and must not be used to secure payments, require land to be given up, or restrict permitted development rights without clear justification.
- **Policy DM7: ‘Relationship with other regulatory regimes’.** The policy requires that development proposals should be assessed on the basis of whether they would be an acceptable use of land. Matters which are controlled by separate regulatory regimes may, in the context of a particular development proposal, be a material consideration where they have land-use implications. Decision-makers should assume, unless there is clear evidence to the contrary, that those separate regimes will operate effectively.

Chapter 4: Achieving Sustainable Development

7.40 Policy S3 requires decision-makers to apply the presumption in favour of sustainable development. For sites that are located outside settlements, policy S5 should apply. S5 identifies categories of development outside settlements that may be supported, and states that these developments should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF. Two of the categories of development which ‘should be approved’ apply to the application site:

- Redevelopment of previously developed land (S5(1)(d));
- Residential development addressing unmet housing need where the authority cannot demonstrate a five-year supply (S5(1)(j)), and where 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 (S5(1)(j)(i)).

7.41 Part 2 of Policy S5 states 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. We address this test in Section 8 of this Statement.

7.42 Policy S6: 'Neighbourhood plans and the presumption', states that *'For development proposals involving the provision of housing, the benefits of approving development are likely to be substantially outweighed by the adverse effects where a proposal would conflict with a neighbourhood plan, 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 allocations to meet its identified housing requirement (see policy HO2).

Chapter 5: Meeting the challenge of climate change

7.43 This chapter sets out policies to shape places in ways that contribute to radical reductions in greenhouse gas emissions and adapt to the full range of current and potential impacts of climate change, by minimising vulnerability and improving resilience. Relevant policies include:

- Policy CC2: Mitigation of climate change. This states that development should mitigate climate change by prioritising sustainable travel, reducing the need to journey, conserving energy and resources, reusing existing materials, supporting low-carbon and decentralised energy, and protecting or enhancing habitats that store carbon. Significant weight is given to proposals that improve the energy efficiency of existing buildings or draw energy from district heat networks, renewable or low-carbon source
- Policy CC3: Adaptation to climate change. This states that development should be planned and designed to minimise vulnerability to climate-change impacts by locating development where flood and coastal-change risks can be safely managed, incorporating SuDS, reducing overheating through design and green infrastructure, and including proportionate wildfire-mitigation measures where relevant. Significant weight is given to proposals that improve the resilience of existing buildings and public spaces to anticipated climate-change effects.

Chapter 6. Delivering a sufficient supply of homes

7.44 This objective of the policies in Chapter 6 is to support the delivery of a substantial increase in the supply of homes, by ensuring that a sufficient amount and variety of land can come forward where needed. In respect of national decision making policies, the following are relevant:

- **Policy HO7: 'Meeting the need for homes'.** This policy states that substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence.

- **Policy HO8: ‘Providing affordable homes’.** This policy states that development proposals should meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures relevant to the location, including the minimum proportion of Social Rent. Part 4 states that *‘Where development proposals include the reuse or redevelopment of vacant buildings, any affordable housing contributions which are due should be reduced by a proportionate amount, equivalent to the gross floorspace of the existing building or buildings’.*
- **Policy HO13: ‘Build out of residential and strategic sites’.** HO13 states that proposals for major development involving the provision of housing should be capable of bringing the housing forward within a reasonable period, taking into account the proposed tenure mix for the development, local market conditions (including absorption rates) and the development history of the site.

Chapter 12. Making Effective use of land

- 7.45 The NPPF explains that the objective of the policies in this chapter is to promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 7.46 Policy L2 requires decision-makers to give substantial weight to development that remediates poor-quality land or makes more effective use of vacant, underutilised or redundant land and buildings.
- 7.47 Policy L3 requires development to achieve appropriate densities by making efficient use of land, taking full account of housing and other development needs, local market conditions, infrastructure capacity and improvement potential, site connectivity, and the need to secure well-designed, attractive and healthy places. Part 2b of policy L3 states that outside settlements, and on land at the edge of existing built-up areas which is allocated or has permission for development and so will form part of a settlement (as defined in the glossary at Annex B), development footprints should make the best use of a site’s development potential, taking into account the policies in the NPPF.

Chapter 14. Achieving well-designed places

- 7.48 The NPPF reports that the objective of the policies in this chapter is to promote high quality, healthy, inclusive and sustainable places. The following national decision-making policies are relevant.
- Policy DP3 requires development to respond positively to its context and deliver well-designed, attractive, healthy and sustainable places by reflecting key principles of liveability, climate resilience, nature recovery, movement, built form, public space and identity, with substantial weight given to proposals that demonstrably achieve high design quality.
 - Policy DP4 requires design quality to be embedded throughout the evolution, assessment and delivery of development, with local planning authorities ensuring robust design review, clear and accurate approved plans, and preventing any post-permission changes that would materially diminish the quality of the approved scheme.

Chapter 15. Promoting sustainable transport

7.49 The NPPF reports that the objective of the policies in this chapter is to ensure that transport considerations are taken fully into account in the preparation of development proposals, using a ‘vision-led’ approach. The following national decision-making policies are relevant to the application proposal:

- Policy TR3 requires development to be located where it can support sustainable movement patterns, maximise accessibility, make effective use of existing and planned transport infrastructure, avoid or mitigate significant transport and environmental impacts, and—particularly in rural areas—enhance opportunities for walking, wheeling, cycling and public transport, with connectivity assessed using the Connectivity Tool alongside other evidence.
- Policy TR4 requires transport to be integral to site design by prioritising walking, wheeling, cycling and public transport, ensuring safe, inclusive and attractive street layouts, providing appropriate and well-located parking (including EV charging), supporting efficient servicing and emergency access, and applying national design guidance to secure high-quality, place-making-led movement networks.
- Policy TR6 requires developments that generate significant movement to be supported by proportionate transport assessments, statements and travel plans that reflect the transport vision for the site, assess future movement scenarios and cumulative impacts, and ensure that proposals are refused where they would result in severe transport network effects or unacceptable highway safety impacts, taking account of mitigation and wider sustainable movement improvements.
- Policy TR8 requires development to protect and enhance public rights of way and, where possible, to extend, link or improve them to deliver better access to green spaces, new and circular routes, safe and convenient connections to services and facilities, and stronger links with public transport.

Chapter 16. Promoting healthy communities

7.50 **Policy HC3: ‘Community facilities and public service infrastructure serving new development’** requires major development generating significant additional population to identify and provide the community facilities and public service infrastructure needed to make it acceptable, using national standards where local ones are absent, and securing timely delivery through planning conditions and obligations so that required facilities are available when the development is first occupied.

Chapter 17. Pollution, public protection and security

7.51 The objective of the policies in this Chapter 17 is to ensure that new development is appropriate for its location, taking into account risks posed by pollution and other hazards; that any impacts which development might have are taken into account; and that sufficient provision is made for development required for public safety and security. The following national decision making policies are relevant to the application proposal:

- **Policy P2: Ground conditions.** Policy P2 requires development to be supported by competent assessment demonstrating that ground conditions, including contamination and land instability, can be safely mitigated so that the site is suitable for its intended use, with remediation achieving at least the Part IIA standard and responsibility resting with the developer or landowner.
- **Policy P3: Living Conditions and Pollution.** This policy ensures development is appropriate for its location by securing healthy living conditions, avoiding or mitigating unacceptable pollution effects (including air, noise, light and water impacts), protecting vulnerable groups, sustaining compliance with national pollutant limits, and assuming effective operation of separate pollution control regimes unless evidence shows otherwise.
- **Policy P4: Impact of Development on Existing Activities.** The policy requires new development to integrate effectively with existing businesses, community facilities, public services and defence activities so they do not face unreasonable restrictions, with applicants acting as the ‘agent of change’ by identifying impacts early and securing mitigation before occupation, including in cases involving changes of use or effects on electronic communications networks.
- **Policy P5: Maintaining Public Safety and Security.** Policy P5 requires development to anticipate and mitigate malicious threats and other hazards by designing for occupier safety, addressing risks in locations where large numbers of people congregate, ensuring hazardous uses do not increase major accident risks, and supporting safe development within consultation zones around hazardous, aerodrome and nuclear sites following engagement with relevant authorities.
- **Policy P6: Land and Operations for Defence and Public Safety.** This policy attaches substantial weight to the importance of defence and public safety sites, facilities and infrastructure, requiring support for their modernisation or expansion and ensuring other development does not harm their operational capability unless suitable alternative provision is secured, applying P4 where operational noise may affect proposed development.

Chapter 18. Managing flood risk and coastal change

7.52 The NPPF confirms that the objective of the policies in this chapter is to ensure development is planned and designed in ways that minimise flood risk, secure safe and resilient places, and avoid inappropriate development in areas vulnerable to flooding or coastal change. The following national decision-making policies are relevant.

- **Policy F4: ‘Assessing flood risk for decision-making’** requires development proposals in Flood Zones 2, 3a and 3b—and certain proposals in Flood Zone 1—to be supported by proportionate site-specific flood risk assessments addressing all sources of flooding and informing the application of the sequential and exception tests.
- **Policy F5: ‘The sequential test’** requires new development to be steered to areas of lowest flood risk unless no reasonably available alternative sites exist, with exemptions only in limited circumstances such as allocated sites or minor development.

- **Policy F6: ‘Development in areas at risk of flooding from rivers or the sea’** requires incompatible uses in Flood Zones 2, 3a and 3b to be refused, and in other cases requires the exception test to demonstrate wider sustainability benefits, safety for the lifetime of the development, and no increase in flood risk elsewhere.
- **Policy F7: ‘Ensuring development is safe from flooding’** requires development in areas at risk of flooding to be refused unless vulnerable uses are located in the lowest-risk parts of the site, safe access and egress are provided, residual risks are managed, flood-resilient design is incorporated, and flood risk is not increased elsewhere.
- **Policy F8: ‘Sustainable drainage systems and watercourses’** requires development affecting site drainage to incorporate SuDS designed to national standards, with long-term maintenance secured, and to avoid enclosing watercourses unless compelling reasons exist.

Chapter 19. Conserving and enhancing the natural environment

7.53 The NPPF states that the policies in this chapter aim to protect and enhance the natural environment, secure nature’s recovery, and ensure development avoids significant harm to biodiversity, geodiversity and landscape character. The following national decision-making policies are relevant.

- **Policy N2: ‘Improving the natural environment’** requires development to conserve and enhance landscape character, habitats and natural features; use poorer-quality agricultural land where significant development is necessary; strengthen ecological networks; incorporate nature-based solutions; minimise biodiversity impacts; and include integrated features for priority species such as swift bricks.
- **Policy N3: ‘Trees in new development’** requires new streets to be tree-lined unless inappropriate, ensures species selection and placement support climate adaptation and infrastructure needs, and requires long-term maintenance of existing and newly planted trees.
- **Policy N4: ‘Protected Landscapes’** requires development within Protected Landscapes to be limited in scale, sensitively designed, and to avoid harm to their statutory purposes, with substantial weight given to conserving natural beauty, wildlife and cultural heritage; major development should be refused except in exceptional circumstances and where in the public interest.
- **Policy N5: ‘Maintaining the character of the coast’** requires development to maintain the character of undeveloped coast, support improved public access, avoid hindering the England Coast Path, and ensure development in Heritage Coast areas respects their special character.
- **Policy N6: ‘Areas of particular importance for biodiversity and geodiversity’** requires strict protection for internationally, nationally and locally designated sites, refusal of development causing loss or deterioration of irreplaceable habitats unless wholly exceptional, and assessment of impacts both within and outside designated areas.

Chapter 20. Conserving and enhancing the historic environment

7.54 The NPPF confirms that the policies in this chapter aim to conserve heritage assets in a manner appropriate to their significance, recognising them as an irreplaceable resource and ensuring they contribute positively to sustainable development. The following national decision-making policies are relevant.

- **Policy HE4: ‘Securing the conservation of heritage assets’** requires development to maintain or secure uses consistent with the conservation of heritage assets, avoid or minimise harm to their significance, justify any harm to designated assets, disregard deterioration caused by deliberate neglect, and consider enabling development only where it would secure the asset’s future conservation.
- **Policy HE5: ‘Assessing effects on heritage assets’** requires proportionate assessments of heritage significance and the effects of proposals (including on setting), clearly identifying whether impacts are positive, neutral, harmful or result in total loss, and using appropriate expertise and historic environment records.
- **Policy HE6: ‘Proposals affecting designated heritage assets’** requires substantial weight to be given to the conservation of designated heritage assets, supports proposals with positive effects, and requires any harm to be weighed against public benefits, with substantial harm or total loss only justified in exceptional or wholly exceptional circumstances depending on the asset’s status.
- **Policy HE7: ‘Decisions on non-designated heritage assets’** supports proposals that have a positive effect on non-designated heritage assets and requires harm or loss to be weighed in a balanced judgement against the benefits of the proposal, having regard to the scale of harm and the asset’s significance.
- **Policy HE8: ‘World Heritage Sites’** requires development affecting World Heritage Sites to pay particular regard to their significance and Outstanding Universal Value (including setting and buffer zones), retain features that make a positive contribution, be informed by management plans and impact assessments, and be assessed in accordance with HE5 and HE6 where loss or harm occurs.
- **Policy HE9: ‘Conservation areas’** requires development within or affecting conservation areas to conserve buildings and features that make a positive contribution, reflect the area’s special architectural or historic interest in design, and assess any loss having regard to the element’s contribution to the conservation area’s overall significance, in line with HE5 and HE6.
- **Policy HE10: ‘Loss or removal of heritage assets’** requires reasonable steps to ensure new development proceeds where loss of an asset is proposed, requires proportionate recording and public accessibility of information about the asset, and requires archaeological assets to be preserved in situ where feasible or otherwise properly investigated, recorded and archived.

National Planning Practice Guidance

7.55 The Guidance provides additional advice in relation to the various aspects of planning including biodiversity, air quality, design, the effective use of land, the historic environment, housing and town centres and retail. Of relevant to the application site are the following elements:

- National Landscape: Paragraph: 039 Reference ID: 8-039-20250129 highlights the statutory duty in respect of National Landscapes, which in turn references the DEFRA guidance. This notes the statutory purposes of National Landscapes are '*conserving and enhancing the natural beauty of the area of outstanding natural beauty*'.
- Supporting more effective use of land: Paragraph: 001 Reference ID: 66-001-20190722 concerns the type of evidence to determine whether land should be reallocated to a more deliverable use and factors to take into account include the planning history, marketing evidence and any change of circumstances. It also notes that it is relevant to consider whether the alternative use would address an unmet need.
- Vacant building credit: Paragraph: 026 Reference ID: 23b-026-20190315 states that national policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings.

7.56 There are other elements of the practice that are not listed here but are relevant to the consideration of the application and are addressed through separate supporting documents if necessary.

Summary

7.57 This section assesses the policy framework relevant to the proposed uses, having regard to the adopted development plan and other material considerations. In respect of the planning issues arising from the proposed development, we have identified the key issues and policies that apply.

- Principle of Development, addressing:
 - Spatial Strategy – Settlement Boundary - considering Core Policies 1, 2 and 11 of the WCS and policies in the CNP and NPPF Policy S5 (Development outside settlements) and L1 (Settlement hierarchy and spatial strategy).
 - Spatial Strategy - Scale and Sustainability – considering Core Policies 1 and 2, 60 and 61 of the WCS policies in the CNP and NPPF Policies L2 and L3 (Optimising density and efficient use of land).
 - Employment Land – considering Core Policy 35 of the WCS and Policy EB1 in the CNP and NPPF Policy E1 (Supporting economic growth).
 - Previously Developed Land – considering the support in the development plan and NPPF Policy L3 (Making best use of land).

- National Landscape – alongside the statutory duty to conserve and enhance the natural beauty of the National Landscape, considering Core Policies 11 and 51 of the WCS, and Policy NE1 of the CNP and NPPF Policy N4 (Protected Landscapes).
- Character and Appearance – considering Core Policies 11 and 57 of the WCS, and Policies BE1 and NE4 of the CNP and NPPF Policy DP3 (Key principles for well-designed places).
- Trees and Landscape – considering Core Policy 51 of the WCS, Saved Policy NE14 of the North Wiltshire Local Plan, and Policies NE1 and NE2 of the CNP and NPPF Policy N3 (Trees in new development).
- Transport – considering Core Policies 60, 61, 62 and 64 of the WCS, Saved Policy T5 of the North Wiltshire Local Plan, Policy CHWB3 of the CNP and NPPF Policies TR3 (Locating development in sustainable locations), TR4 (Street design, access and parking), TR6 (Assessing transport impacts) and TR8 (Public rights of way).
- Heritage – considering Core Policy 58 of the WCS and Policy BE2 of the CNP and NPPF Policies HE4 (Conservation of heritage assets), HE5 (Assessing effects), HE6 (Designated heritage assets), HE7 (Non-designated heritage assets), HE9 (Conservation areas) and HE10 (Loss or removal of heritage assets).
- Flood Risk and Drainage – considering Core Policies 67 and 68 of the WCS and NPPF Policies F4 (Assessing flood risk), F5 (Sequential test), F6 (Exception test), F7 (Ensuring development is safe from flooding), and F8 (Sustainable drainage systems).
- Ecology – considering Core Policies 11 and 50 of the WCS, and Policies NE1 and NE2 of the CNP and NPPF Policies N2 (Improving the natural environment) and N6 (Areas of particular importance for biodiversity and geodiversity).
- Lighting – considering saved Policy NE18 of the North Wiltshire Local Plan, Policy SE3 of the CNP and NPPF Policy P3(e) (Artificial light impacts).
- Sustainable Construction – considering Core Policy 41 of the Core Strategy, Policy BE5 of the CNP and NPPF Policy DP3(2)(b) (Climate mitigation and adaptation through design).
- Noise – considering saved Policy NE18 of the North Wiltshire Local Plan, Core Policy 55 of the WCS and NPPF Policy P3(d) (Noise impacts).
- Ground Investigation - considering Core Policy 56 of the WCS and NPPF Policy P2 (Ground conditions).
- The Planning Balance, both from a statutory perspective under Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the ‘the presumption in favour of sustainable development’ under NPPF Policies S3 and S5.

8 Planning Assessment

Introduction

8.1 Taking into account the development plan and the requirements of national planning policy outlined in Section 7 of this Statement, the key issues relevant to the determination of this application are considered to be as follows:

- Principle of Development, addressing:
 - Spatial Strategy – Settlement Boundary
 - Spatial Strategy – Scale and Sustainability of Location
 - Loss of Employment Land
 - Previously Developed Land
- Effects on National Landscape;
- Approach to Design and Character of Area;
- Trees and Landscape ;
- Heritage;
- Transport;
- Flood Risk and Drainage;
- Ecology;
- Lighting;
- Sustainable Construction;
- Noise;
- Ground Investigation; and
- The Planning Balance.

8.2 We assess the proposal's effects and its compatibility with the relevant policies below.

Principle of Development

Spatial Strategy – Settlement Boundary

8.3 Colerne is defined as a large village in the WCS, and the application site lies on its edge. It is therefore outside the defined settlement boundary. This approach is retained in the CNP. Consequently, Core Policy 2 of the WCS would only permit development outside the settlement boundary where one of the exceptions in paragraph 4.25 of the supporting text applies.

8.4 The CNP also concludes that the application site is unsuitable for residential development. However, it does not impose additional restrictions on the land beyond those within the WCS, nor does it preclude development on the site - as it would allow for employment development. This Planning Statement directly addresses the reservations identified in the Neighbourhood Plan.

- 8.5 Given that the application site is previously developed land, the exemptions available to brownfield sites are extensive. These could include intensive employment redevelopment, tourism uses, or specialist accommodation, subject to the wider requirements of the relevant policies. Accordingly, the principle of redeveloping the site is not precluded by the development plan.
- 8.6 The main exception that could apply is Core Policy 37: Military establishments, which Wiltshire Council has applied to analogous former MoD sites in the past. Pre-application advice questions whether this policy should apply, given that the site is no longer owned by the MoD and had been in commercial storage use for several years. However, the site was originally a military installation, and the buildings were designed as aircraft hangars, with the associated design constraints such structures present for employment uses.
- 8.7 In our view, whether Policy 37 applies or not should not be determinative to the overall principle of development, because there are other strong supporting factors that justify the redevelopment of a previously developed, edge-of-settlement site. Notwithstanding this, we note the following points from Policy 37:
- It states that redevelopment of redundant MoD sites will be supported where they are well-related to an existing settlement in terms of both location and scale. The application site lies immediately on the edge of an existing settlement, and is clearly 'well-related' to it.
 - It states that redevelopment proposals should not exceed the existing building footprint and floorspace unless they are well-related to an existing settlement. As evidenced in the Design & Access Statement, the proposed development parameters align with the existing built form of the site and, in any event, the site is well-related to an existing settlement.
 - It states that the focus will be on employment-led development, but importantly other uses are not precluded. These other uses should be determined through a masterplanning approach with the local community. Extensive masterplanning with the local community has previously taken place on this site, during which the merits of residential development were recognised (see Section 4).
 - It states that development at operational or redundant sites should enhance the overall character of the site. The site is currently characterised by large utilitarian hangar structures and hardstanding. Its replacement with a sensitively designed residential development in a generous landscaped setting will undoubtedly enhance the site's character.
 - It states that all development at operational or redundant sites should mitigate adverse impacts on local infrastructure and should not erode the character of the surrounding area. As explained throughout this Section, the development seeks to mitigate its impacts and preserve the area's character.
 - Finally, it states that proposals should ensure that the cultural and historical significance of the military facilities on the site are understood and inform future development. This matter is addressed in the submitted Heritage and Archaeology Statement.
- 8.8 In respect of the principle of development on the application site, it is acknowledged that there is a degree of inconsistency with the spatial strategy dimension of the development plan, but only insofar as the proposal is for residential development outside the

settlement boundary. However, the weight attached to this inconsistency should be substantially reduced for the following reasons:

- There is no up-to-date Local Plan for the area since the emerging Local Plan was withdrawn.
- The Council has an acknowledged shortfall in housing land supply (see planning balance section).
- The CNP was prepared in the context of anticipated changes to the wider airfield site and was expecting that there was going to be a need to revise the Plan in 2023.
- The CNP included an allocates only five dwellings against an identified need of 35–40 over the plan period.
- This is a previously developed site on the edge of a settlement, where planning policy prioritises redevelopment.
- The exception categories allow for a range of redevelopment scenarios.
- The Military Establishments exception category under Policy 37 of the WCS allows for other uses, and the development proposals reflect the intent of this policy, even if it is ultimately concluded that the policy does not apply.

8.9 Policy S3 of the NPPF sets out the presumption in favour of development and for sites outside settlements Policy S5 applies. The presumption would apply to the application site on two counts, because it is previously developed land (category d) and would meet an unmet housing need and is physically well-related to an existing settlement (category j, i).

8.10 Overall, the principle of redeveloping previously developed land on the edge of a large village is supported by the development plan and relevant material considerations, including the NPPF.

Spatial Strategy - Scale and Sustainability of Location

8.11 Colerne is defined as a large village, and Core Policy 1 expects development to be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The CNP anticipated 35–40 dwellings for the area, although this figure was necessarily indicative, and the Plan recognises that a review may be required if circumstances change.

8.12 In addition, Policy 37 of the WCS requires consideration of the scale of development and its relationship with the existing settlement.

8.13 In this context, ‘scale’ relates to the overall quantum of residential development rather than scale as a reserved matter. When judging scale in the context of spatial strategy, two points are relevant:

- The scale of residential development is connected to the sustainability of the settlement.
- When considering scale on a previously developed site, the characteristics of the site itself are relevant. For example, national planning policy requires the best use to be made of previously developed land.

8.14 It is recognised that 150 dwellings exceed the indicative expectation in the CNP, but this does not mean it is unacceptable in spatial planning terms. Therefore, our justification for the development being of an appropriate scale is as follows:

- Colerne Parish is described in the Neighbourhood Plan as a *“large community of about 3,000 but still comprises a working village and environs - not just residential, not just retirees, not a ‘second-home ghetto’, but enlivened by working folk, young families and their activities”*. The area plainly has vibrancy and a strong level of local services.
- Our sustainability assessment in Section 3 concluded that the village and its surroundings benefit from a good level of local service provision, including shops, medical practices, community facilities, recreational spaces and a primary school, all within convenient walking distance of the application site. The settlement is supported by regular bus services on routes 228 and 636, providing direct connections to Corsham, Batheaston, Bath, Chippenham and Marshfield, including links to secondary schools and both Bath and Chippenham rail and bus stations. Although there is no dedicated cycle infrastructure, the surrounding rural lanes offer suitable conditions for cycling, and footways are present along key village roads, ensuring safe pedestrian access to services and public transport. Taken together, these factors demonstrate that the site is well located in relation to local and wider facilities, consistent with national planning policy which recognises the need for flexible approaches to sustainable transport in a large village settlement.
- A development of 150 dwellings could result in a population yield of around 360 persons (dependent on mix), meaning the overall population of the Parish would increase by approximately 12%. This is a modest percentage increase but would help support the vitality of existing services, consistent with the broad aims of Core Policy 1.
- The site is previously developed land, and the gross density of 21 dwellings per hectare compares with the village average of between 15 and 33 dwellings per hectare. It is also noteworthy that around one-third of the site is dedicated to mitigation and is not part of the developable area. Bearing in mind the need to make the best use of land and the proposed densities, this is judged to be entirely reasonable.

8.15 Therefore, although the 150 dwellings proposed exceed the indicative level expected in the CNP, this does not render the development excessive in scale from a spatial planning perspective.

Loss of Employment Land

8.16 The application site represents employment land, with one of the three buildings currently occupied on a flexible tenancy. The application is accompanied by an Employment Land Review (ELR), produced by Alder King, which assesses the site against the policy tests in Core Policy 35 of the WCS and Policy EB1 of the CNP. The assessment addresses the following matters:

- a) Whether the site is fit for purpose.
- b) Whether the site has been marketed for employment use.
- c) Whether the site is required to support the local economy.
- d) Whether it is possible to redevelop the site for alternative employment use.

- 8.17 In respect of (a), the ELR advises that while the hangars are physically suitable for occupation, offering good floorspace and high ceilings capable of accommodating HGVs, the site is significantly hampered by poor accessibility to the strategic road network. Although the M4 motorway is less than five miles away ‘as the crow flies’, access requires travelling along indirect and narrow rural lanes that are wholly unsuitable for large-scale industrial or commercial traffic. Several prospective tenants have advised that the site’s poor connection to the motorway network makes it unsuitable for employment uses.
- 8.18 Turning to point (b), the ELR confirms that the site has been actively marketed since 2020, with a particular focus on Hangar 18, which was refurbished in 2022 and would therefore be the most attractive proposition. Alder King undertook the marketing of the site, demonstrating considerable flexibility in pricing and letting arrangements in response to weak demand at this location. However, no consistent occupiers have been secured over the last six years. Although some prospective occupiers were initially attracted by low rents and ample floorspace, all were ultimately deterred by the site’s poor connectivity.
- 8.19 The ELR also considers whether the site is necessary to support the local economy, addressing point (c). To do so, it analysed the Functional Economic Market Area (FEMA) in which the site sits, centred on the A350 corridor. Alder King found that 97.6ha of land is allocated for employment within the FEMA, of which 78.6ha remained available at the time of writing. In addition, Wiltshire’s Employment Land Review (2023) identified a maximum total demand of 89ha for employment uses (including offices) within the FEMA, meaning that more than sufficient employment land is already allocated. Market analysis also shows that 156,185m² of industrial floorspace is currently available in the FEMA, including high-quality newbuild facilities close to the motorway, such as Indurent Park, which compete directly with the Colerne site. Overall, the wider area is very well provided with employment floorspace, much of which is more suitable for large-scale employment activity than the application site. As such, the site is considered surplus to requirements and not needed to support the local economy.
- 8.20 Finally, point (d) addresses whether the site could be redeveloped for alternative employment uses. Alder King undertook a detailed viability analysis of a newbuild employment-led scheme, which demonstrated that for such a scheme to be viable, rents would need to be between £13 and £17 per square foot, compared with current market levels of £8.50 to £11.50. Such an uplift in rental values is not realistic, and the report therefore concludes that redevelopment for alternative employment uses is not viable.
- 8.21 In summary, the Employment Land Review concludes that the site is surplus to local employment needs and provides clear evidence to justify its redevelopment for non-employment purposes under Policy EB1(a) of the CNP.

Previously Developed Land

- 8.22 The site is previously developed land in an area where there is no five-year supply of housing, and this means it is given elevated status within both the development plan and national planning policy when the principle of development is considered.
- Core Policy 2 of the Core Strategy seeks to deliver sustainable development through the re-use of previously developed land, aiming for at least 35% of land to be on brownfield sites.

- Policy S3 and S5 of the NPPF applies the presumption in favour of sustainable development to previously developed land and says that proposals should be approved.
- Policy L2 of the NPPF says that substantial weight should be given to the benefits where a development proposal where it would be making better use of vacant and underutilised land and buildings by redeveloping underutilised retail and business sites.

8.23 In Wiltshire, there is no five-year supply of deliverable housing sites and no up-to-date Local Plan. Therefore, the starting point is to look positively on the redevelopment of previously developed land and indeed, it is evident this benefit should be given very substantial supporting weight within the planning assessment.

Conclusion on Principle of Development

8.24 Subject to the effects on the National Landscape other site-specific considerations, the case for the redevelopment of the application site for residential purposes is compelling. Our main points are as follows:

- The site is previously developed land, and both national and local policy give significant weight to redeveloping such sites, especially where they help meet identified housing needs.
- Any inconsistency with the spatial strategy carries reduced weight because the Council lacks a five-year housing land supply and has no up-to-date Local Plan.
- The development plan does not prohibit redevelopment of the site and although it lies outside the settlement boundary, the principle of development can be supported through a range of exemptions.
- The intent of Core Policy 37 aligns with the proposal even if it does not apply because it is well related to the settlement, capable of accommodating residential uses and can enhance the character of the area.
- The site is not needed for employment purposes: it has poor strategic accessibility, has been marketed extensively without success, sits within an area with ample employment land supply, and cannot viably be redeveloped for modern employment uses.
- The scale of development is appropriate for a large village, supports local facilities, makes efficient use of previously developed land, and reflects local densities.

Effects on the National Landscape

8.25 The application site is in the designated the Cotswolds National Landscape (CNL) alongside the remainder of Colerne Parish. There is a statutory duty in section 85 of the Countryside and Rights of Way Act 2000 as amended by section 245 of the Levelling-up and Regeneration Act 2023 to seek to further the purpose of conserving and enhancing the natural beauty of National Landscapes.

8.26 Policy N4: Protected Landscapes states that development proposals should be limited in scale and extent and sensitivity located and designed to avoid harm to the statutory purposes and special qualities of the Protected Landscape. It also states that substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas. Part 2 of Policy N4 states that proposals for major development within Protected Landscapes should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest

8.27 The application is accompanied by a detailed Landscape and Visual Impact Assessment (LVIA) consistent with the GLVIA 3rd edition to inform judgements on the effects on the National Landscape. In respect of the site itself, the LVIA notes the following:

- The site consists of previously developed land containing three large former aircraft hangars and associated hardstanding.
- The wider locality is valued for its Cotswolds National Landscape (CNL) designation and recognised special qualities, including gently undulating plateau/wolds farmland contrasting with the more strongly defined By Brook valley.
- The immediate context is influenced by the settled character of Colerne, North Colerne, Thickwood, and the adjacent former airfield.
- Local variations in enclosure arise from mature woodland and other vegetation features within the surrounding landscape.
- Aside from being located within the CNL, the site itself has very limited landscape value or contribution to natural beauty, due to the presence of large hangars, extensive hardstanding, utilitarian fencing and poor-quality lighting.
- The wider former airfield and its built elements further diminish natural and scenic qualities in the immediate area.

8.28 In terms of visual context, the LVIA concludes:

- The site's visual context is shaped by landform, existing built form, extensive vegetation and its relationship with nearby residential areas and public rights of way.
- Visibility across the site is variable and seasonal, with summer leaf cover providing strong containment and integration, while winter views remain largely restricted by roadside vegetation, built form and landform.
- The value and sensitivity of views are influenced by the site's location within the CNL and the presence of key views identified in the CNP.
- Local sensitivity is moderated by the site's existing brownfield character, including large-scale airfield structures and the well-settled context of Colerne and the former airfield.

8.29 The LVIA concludes the following on visual matters:

- The development will create long-term, permanent landscape change by replacing three former aircraft hangars and hardstanding with residential development, open space and planting.

- The scheme will form a logical extension to the existing residential settlement, which itself lies within the CNL.
- Although the change represents a noticeable shift in character at the site and immediate settlement edge, wider landscape effects are limited due to existing site conditions and the retention and strengthening of boundary vegetation.
- Landscape effects range from moderate beneficial and slight/moderate adverse at the site level, reducing to slight or negligible effects (both beneficial and adverse) on surrounding and wider landscape receptors.
- As planting matures, landscape containment and integration with the wider landscape will increase, further reducing effects over time.
- Effects on tranquillity are balanced and limited, resulting in a neutral to slight adverse effect, reflecting the trade-off between the removal of existing detracting features and the introduction of residential activity and lighting.
- Overall effects on the CNL are limited and localised, with the development relating well to the adjacent settlement and incorporating embedded mitigation that ensures very limited impact on the special qualities of the wider CNL.

8.30 The statutory duty requires the conservation and enhancement of the natural beauty of the CNL. The proposed development meets this duty by replacing large, utilitarian hangar structures with a well designed residential scheme set within a generous landscape setting. The LVIA confirms that the scheme incorporates embedded mitigation, including minimising any vegetation removal, limiting the northern extent of development and building height, and providing landscape buffers.

8.31 Core Policy 51 requires development to protect, conserve and, where possible, enhance landscape character. The CNP similarly expects development to respect the landscape, agricultural character and built form of the parish and the CNL. The LVIA demonstrates that the proposal meets these requirements: it avoids harmful landscape effects, delivers a clear enhancement through the removal of large utilitarian structures, and integrates sensitively with the CNL through strong landscape design and embedded mitigation.

8.32 Policy N4 of the NPPF states that major development within a National Landscape should be refused unless exceptional circumstances are demonstrated. Whether the proposal constitutes “major development” under footnote 59 is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the statutory purposes for which the area has been designated or defined. It is noted that the LVIA identifies no significant adverse impact on the purposes of the CNL. Nevertheless, in recognition of the scale of up to 150 dwellings, the following section addresses the three assessment tests in full.

a) The need for the development, including in terms of any national considerations such as maintaining a sufficient supply of minerals, and the impact of permitting it, or refusing it, upon the local economy;

8.33 There is a substantial and acknowledged unmet need for housing in Wiltshire. The recent Secretary of State decision in Melksham (reference APP/Y3940/W/25/3373278) confirmed that the five-year housing land supply stands at only 2.16 years, equating to a shortfall of 10,405 dwellings. The Secretary of State concluded that this represents a very significant deficit and accordingly afforded significant weight to the delivery of

market housing. In addition, the evidence demonstrates that the site is not required for employment purposes.

8.34 The CNP allocates only five dwellings against an identified need of 35–40 over the plan period and therefore even if this lower need was to be met, it would still require development in the CNL.

8.35 Since the CNP was produced, the housing need for Wiltshire has increased substantially. The Core Strategy identified a requirement of 2,100 dwellings per year between 2006 and 2026. The Baseline Survey of Area (2026–2045), prepared as part of the Social Baseline for the emerging Local Plan, identifies a minimum need of 3,463 dwellings per year. This represents an increase of 1,363 dwellings per year, equivalent to a 64.9% uplift. Applying this uplift to the CNP's previously calculated minimum need results in a revised requirement of between 58 and 66 dwellings per year.

8.36 In this context:

- There is a pressing and evidenced need for residential development in Wiltshire, including within Colerne. Any development within Colerne will necessitate development within the CNL area, and the scale of unmet need reinforces the importance of delivering suitable sites where they arise.
- Permitting the development will deliver clear economic benefits, including new population supporting the viability of local services such as the school, alongside construction-phase investment and employment.
- The site currently provides limited economic value, and refusal would leave a deteriorating previously developed site in place, preventing the delivery of the economic, social and environmental benefits associated with its redevelopment.
- While the previously calculated minimum need does not itself extend to 150 dwellings, the characteristics of this previously developed site, including its ability to accommodate a well-designed scheme without encroaching on greenfield land, mean that the requirement to make the most efficient and effective use of such land is a significant exceptional factor in this case.

b) The cost of, and scope for, developing outside the Protected Landscape, or meeting the need for the development in some other way

8.37 The application site is previously developed land, and national policy requires such land to be reused and optimised wherever possible. Redevelopment of this specific site cannot occur outside the designated landscape, as the location of the previously developed land is fixed; any alternative location would, by definition, fail to regenerate the site and would instead displace development onto greenfield land elsewhere.

8.38 Furthermore, the entirety of Colerne Parish lies within the CNL. As a result, any development required to meet local housing needs must, unavoidably, take place within the National Landscape. The Neighbourhood Plan recognises this spatial reality, identifying an indicative requirement of 35–40 dwellings and already accepting that new housing will come forward within the CNL.

8.39 In this context, the proposal represents the most sustainable and policy-aligned option: it reuses previously developed land, avoids greenfield encroachment, and delivers a beneficial and efficient use of a deteriorating site that cannot be delivered elsewhere. The development therefore accords with national policy expectations for making best use of previously developed land, even within designated landscapes.

c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated.

8.40 There will be no significant detrimental effects on the environment, landscape or recreational opportunities. The site is a private, previously developed parcel of land with no public access and limited existing landscape value. Its current character is defined by utilitarian airfield structures, hardstanding and degraded vegetation, all of which reduce sensitivity and diminish the contribution the site makes to natural beauty.

8.41 The LVIA confirms that the presence of large-scale airfield buildings already moderates local landscape sensitivity, meaning that the degree of change arising from redevelopment is substantially less than would occur on an undeveloped greenfield site. The proposed scheme incorporates embedded mitigation, including minimised vegetation removal, controlled northern extent and building height, and robust landscape buffers, ensuring that the development is appropriately contained and integrated.

8.42 In reality, the replacement of deteriorating hangars with a landscape-led residential scheme will improve the visual quality of the site and strengthen the transition between village and countryside. This change results in a net enhancement of natural beauty consistent with the statutory duty under Section 85, demonstrating that development within the National Landscape can be delivered without harm and with clear environmental and landscape benefits.

8.43 Taken together, these factors demonstrate that exceptional circumstances exist to redevelop this previously developed land within the National Landscape. In summary:

- All development in Colerne Parish necessarily occurs within the CNL, and the development plan anticipates new housing within this designation. There is no spatial alternative outside the National Landscape to meet local housing needs.
- The existing hangars detract from the appearance and qualities of the CNL, whereas the proposed residential scheme with reduced building height and substantial landscape buffers will form an integrated and visually appropriate extension to the village. As such, there would not be a significant adverse impact on the purposes for which the area has been designated or defined, and the development will improve the transition between village and countryside.
- The southern side of Colerne is constrained by Green Belt as well as the CNL, so redeveloping previously developed land to the north provides one of the few realistic opportunities to deliver additional housing adjacent to the settlement boundary. This represents the most sustainable and least harmful location for accommodating growth.

- The development delivers substantial benefits comprising 150 homes, including affordable housing, contributing directly to an acknowledged housing land supply shortfall which must be urgently addressed. The increased population will support the viability of local services and generate wider economic benefits, ensuring that the redevelopment of this previously developed site delivers significant social and economic gains.
- The proposal replaces deteriorating airfield structures with a landscape-led scheme that enhances natural beauty, accords with the statutory duty under Section 85, and demonstrates that development within the National Landscape can be delivered without harm and with clear environmental improvements.

8.44 Therefore, overall, the evidence shows that the effects on the National Landscape are acceptable, moderated, and in several respects beneficial. The proposal meets the statutory duty and all relevant policy requirements, and the combination of spatial constraints, previously developed land status, landscape enhancement and substantial public benefits clearly establishes that this is an exceptional situation where redevelopment within the National Landscape is justified.

Approach to Design and Character of Area

8.45 The application is submitted in outline with only point of access provided in detail. Therefore, detailed matters on layout, appearance and landscaping are reserved for future approval. However, the application commits to a developable area, which sets out the extent of landscaping. It also provides an indicative masterplan that shows the sort of development that could be delivered within this developable area.

8.46 The Design & Access Statement provides further detail on the approach to design as follows:

- The Illustrative Masterplan has evolved in response to the site analysis work, landscape considerations and the pre-application feedback received from Wiltshire Council. In particular, consideration has been given to the relationship between the proposed development and the surrounding landscape setting, the retention and reinforcement of green infrastructure, ecology, and the transition between the settlement edge and the surrounding countryside.
- The layout proposes a principal vehicular access from Bath Road to the south of the site, with an internal movement structure extending through the development area. The arrangement of development parcels and movement routes shown within the illustrative masterplan is indicative only and will be subject to further refinement through the Reserved Matters process.
- Areas of open space are indicated throughout the illustrative layout, including landscaped corridors following primary roads, a central area of amenity space and a large, landscaped area toward the northern part of the site which accommodate drainage infrastructure. The detailed arrangement, extent and character of these spaces, including green and blue infrastructure design will be developed further through subsequent Reserved Matters submissions.

- The outline proposals seek to establish a framework for development which responds positively to the site context and aligns with the principles of Core Policy 57 and the Wiltshire Design Guide, including the importance of landscaped design, reinforcing local distinctiveness, and achieving an appropriate relationship between built form, movement and green infrastructure.

8.47 In our view, the key policy-based design issues associated with this development concern the impact on the character of the area and the integration of the development with the village. There is also a concern expressed in the CNP in respect of developing north of the C151.

8.48 With respect to character, the Design and Access Statement sets out how local distinctiveness has informed the evolution of the proposals. In our view, the development would respect the character of Colerne for the following reasons:

 - Colerne's historic core is focused around the High Street and Market Place (the designated Conservation Area), with modern residential growth occurring to the north (between the application site and the Conservation Area), east and west.
 - These modern additions have created an irregular built form at the village edge, typically softened by landscaped buffers extending away from the historic core. For example, Character Area A8 (as defined in the Design and Access Statement) extends beyond Quarry Lane to the east.
 - The highest density identified in the Design and Access Statement is Character Area A9 (Forrester Green) at 33 dwellings per hectare. The proposal's gross density of 21 dwellings per hectare sits comfortably within the village's overall density range of 15–33 dwellings per hectare and is therefore reflective of established character.
 - A residential extension incorporating a generous landscaped buffer is consistent with previous modern growth in the village and represents a logical continuation of the settlement pattern, making effective use of previously developed land.

8.49 In terms of integration, the site currently lacks a convenient pedestrian connection to the village. The proposals address this through new footways and crossing facilities designed to link the development with village services. Footways are proposed on both sides of the vehicular access and along the northern side of Bath Road across the site frontage. Pedestrian refuge islands on Bath Road will provide safe connections to existing facilities and the footway on the southern side of the carriageway. These measures will ensure that the development integrates effectively with the village centre and wider area.

8.50 Although the CNP notes a reservation about development north of the C151, it does not impose any specific policy constraint preventing development in this location. The application site comprises previously developed land capable of being integrated into the settlement, with landscape effects that can be appropriately mitigated. There are no design-related reasons that would preclude development on this part of the land north of the C151, and any future proposals elsewhere would need to be assessed on their individual merits.

- 8.51 Given that detailed permission is sought only for the developable area and access, the impact on local character is acceptable. The site represents a logical extension to the village, utilising previously developed land in a manner consistent with other modern additions. The proposed landscaped buffer will ensure a seamless transition at an appropriate density, reinforcing the established settlement pattern. Accordingly, the development accords with Core Policies 11 and 57 of the WCS, Policies BE1 and NE4 of the CNP, and reflects the design principles set out in NPPF Policy DP3 (Key principles for well-designed places).

Trees and Landscape

- 8.52 A tree survey was undertaken by Treework Environmental Practice in March 2026, followed by the preparation of a Tree Constraints Plan, Tree Schedule and Tree Constraints Summary. The survey identified 57 individual trees and tree groups on the site: 26 category B, 24 category C, 7 category U, and none in category A. The higher-quality category B trees are concentrated along the southern boundary, forming a line of mature Norway Maples and Lawson Cypressess.
- 8.53 An Arboricultural Impact Assessment (AIA) was subsequently completed in June 2026. This confirms that 16 trees and groups are proposed for removal, comprising nine category B trees, four category C groups, part of a category C hedge, and two category U features. Most of the category B trees to be removed are Cypress trees on the southern boundary. Their removal is proposed because they are non-native and detract from the character of the CNL. Removing these trees will also create additional space for the adjacent Norway Maples to mature. Further tree removal is required to provide sufficient space for the development to proceed. The AIA notes the following:
- Crown lifting is proposed on several retained trees to provide adequate clearance for the Bath Road footway and carriageway. This pruning will be minor and will not harm the health or structure of the trees.
 - All retained trees will be incorporated into the landscape scheme, with appropriate protection secured through the Tree Protection Plan.
 - Along Bath Road, special protection measures will ensure no harm occurs during the installation of the new footway. Root Protection Areas will be safeguarded through construction exclusion zones, preventing ground-level activities that could damage roots.
 - Particular care will be required around the retained Norway Maples on the southern boundary, where the proposed footway encroaches into their Root Protection Areas. Full details of the footway design and tree protection measures will be submitted at reserved matters stage. The AIA recommends no-dig construction and the use of porous surfacing to avoid root damage.
- 8.54 The indicative landscape design provides for habitat retention, ecological buffers, new habitat creation, improved ecological connectivity and dedicated bat mitigation measures. The scheme will deliver measurable biodiversity enhancements through biodiverse grassland, native tree planting and scrub habitats, supported by long-term management. A minimum of 10% Biodiversity Net Gain (BNG) will be achieved through a combination of on-site and off-site provision, in accordance with statutory requirements.

- 8.55 The proposed SuDS attenuation features are designed to contribute positively to biodiversity and integrate with the local landscape, avoiding an engineered or intrusive appearance.
- 8.56 Retained vegetation, new planting, open space, ecological buffers and integrated SuDS features will together establish a robust green infrastructure network. This will reinforce local character, support biodiversity, enhance climate resilience and create an attractive setting for the development. While detailed design will be addressed at reserved matters stage, the Landscape and Ecology Parameters Plan and the defined developable area provide clear justification for the proposed approach.
- 8.57 Accordingly, the proposed tree retention strategy and sensitive landscape approach accord with Core Policy 51 of the WCS, Saved Policy NE14 of the North Wiltshire Local Plan, Policies NE1 and NE2 of the CNP, and reflect the requirements of NPPF 2026 Policy N3 (Trees in new development), which seeks to ensure that existing trees are protected, integrated and enhanced as part of high-quality, well-designed schemes.

Transport

- 8.58 The application is supported by a comprehensive Transport Assessment (TA) and a Residential Travel Plan. The TA reviews the site's accessibility, internal layout and access arrangements, and assesses the potential traffic impacts on the surrounding road network arising from the proposed development. The key conclusions of this assessment are as follows:
- The site is within an appropriate walking/cycling distance of local facilities such as bus stops, primary school and village shop. A wider range of employment, education and other facilities and amenities are accessible by bus or short car journey.
 - The proposed site access has previously been agreed with WC as part of previous applications and would be satisfactory to serve the levels of traffic and types of vehicles using it with suitable visibility splays to be provided.
 - The site access allows for suitable pedestrian access, with a further pedestrian access points proposed.
 - The provision of a residential development would significantly reduce HGV movements on the local road network which is a significant highway operation and safety benefit.
 - The car and cycle parking provision would be provided in accordance with guidance provided in the Wiltshire parking and cycling strategies.
 - The highway works including new pedestrian footway and crossing points would improve local pedestrian and safety conditions and benefit both the development site and the existing users of the local highway network with further works at Ford reducing vehicle speeds.
 - The traffic analysis has confirmed there would be no material impact on the safety or operation of the local highway network as a result of the development proposals and counterbalancing any potential traffic impacts elsewhere in the network.

- 8.59 Appendix 9 of the TA sets out the proposed off-site highway improvements at both Bath Road and in Ford.
- 8.60 Overall, the TA demonstrates that the proposed development is well-located, with good accessibility to local services; that its layout and access arrangements are appropriate for the intended use; and that the proposals would not give rise to any detrimental impacts on the wider highway network. On this basis, the application accords with Core Policies 60, 61, 62 and 64 of the WCS, Saved Policy T5 of the North Wiltshire Local Plan, Policy CHWB3 of the CNP, and the requirements of NPPF 2026 Policies TR3 (Locating development in sustainable locations), TR4 (Street design, access and parking), TR6 (Assessing transport impacts) and TR8 (Public rights of way).

Heritage

- 8.61 The application is supported by a Heritage and Archaeology Statement comprising three components: a baseline assessment, a historic buildings assessment, and a heritage impact assessment.
- 8.62 The baseline assessment identifies Colerne Conservation Area as the nearest designated heritage asset, located approximately 120 m to the south. The Conservation Area contains 84 listed buildings, all of which are visually separated from the site by the C151 and later residential development. The site itself forms part of the former RAF Colerne airfield, constructed between 1939 and 1941 and used actively during the Second World War. The airfield ceased active use in 1976 and closed entirely in 2025, with the associated army barracks scheduled for closure in 2030. The airfield is recognised by the local authority as a non-designated heritage asset of low to medium historic significance.
- 8.63 The historic buildings assessment identifies the three onsite buildings as L-Type hangars, a mass produced wartime building type characterised by steel construction and parabolic turf covered roofs. The hangars are not well preserved: the original roof coverings have been replaced with bituminous materials, the roofline has been altered, and several ancillary structures have been lost. Nonetheless, the distinctive parabolic roof form remains, and the buildings retain some group value as part of the wider airfield. Overall, the hangars are assessed as having low heritage significance, with better preserved examples of this building type found elsewhere nationally.
- 8.64 The heritage impact assessment considers five relevant non-designated heritage assets and evaluates the potential effects of the development on each, balancing these against the public benefits of the scheme. The assets are assessed as follows:
- Colerne Airfield: A minor degree of harm would arise from the proposals; however, the application site represents only a small portion of the airfield and the majority of historic features will remain. The airfield will therefore continue to exhibit low, approaching medium, heritage significance.
 - Stanton air-raid shelter: This feature is heavily overgrown and may not be present. The area is proposed as a dark corridor and will not be affected by the development. No impacts are anticipated.

- Remains of four WWII-era trenches: These features were identified through aerial photography but are no longer visible at the surface and are likely buried. If they survive, the development would result in their loss; however, they are assessed as having low heritage significance.
- L-Type aircraft hangars: The three hangars would be lost as part of the proposals. Their significance is assessed as low due to their ubiquity and the extent of later alterations.
- Mechanical and electrical plant building: This building has limited heritage significance and is indicatively proposed for retention. No adverse impacts are anticipated.

8.65 The assessment concludes that the principal heritage impacts comprise the loss of three hangars of low heritage significance and a minor degree of harm to Colerne Airfield, which has low to medium significance. These impacts can be mitigated through an appropriate programme of recording in accordance with NPPF 2026 Policy HE10.2. Ultimately, the limited level of harm must be weighed against the public benefits of the development, which are set out within the Heritage and Archaeology Statement and summarised in the planning balance section of this Planning Statement.

8.66 Overall, the proposed development will have limited impact on non-designated heritage assets and is consistent with Core Policy 58 of the WCS, Policy BE2 of the CNP, and the heritage requirements of NPPF 2026 Policies HE4.1 and HE5.1.

Flood Risk and Drainage

8.67 A Flood Risk Assessment (FRA) and Drainage Strategy accompany the application. These assess flood risk from all potential sources and demonstrate how surface water can be managed appropriately across the site.

8.68 The FRA confirms that the site is at low or negligible risk from all forms of flooding. The site occupies an elevated position and is located well away from any rivers, meaning tidal and fluvial flooding are highly unlikely; accordingly, it lies within Flood Zone 1. The underlying geology indicates that groundwater flooding is very unlikely, and no risks have been identified from sewers or reservoirs. There is some potential for limited pluvial flooding, although Environment Agency mapping is conservative in this respect and indicates that any surface water flooding would be shallow, with depths likely to be less than 0.3 m.

8.69 The Drainage Strategy sets out how sustainable drainage systems (SuDS) will be used to manage surface water on site. It follows the SuDS hierarchy, which requires drainage options to be considered sequentially. This begins with rainwater harvesting, followed by infiltration, and then other forms of drainage. Rainwater harvesting will be encouraged within the scheme, with detailed proposals to be developed at reserved matters stage.

8.70 Infiltration was then assessed. The underlying geology and historic testing suggested that infiltration would be feasible, and further testing undertaken in February 2026 confirmed that infiltration rates are sufficient to support infiltration as a suitable method of surface water discharge.

- 8.71 The Drainage Strategy therefore proposes that surface water will ultimately be discharged to ground via infiltration, using a combination of techniques including soakaways, permeable paving and an infiltration basin.
- 8.72 Soakaways within private gardens will manage roof drainage, while permeable paving will drain private driveways and parking areas. Tree pits will intercept runoff from pavements. Surface water from the private and adopted highway network will be directed to an infiltration basin located in the north of the site via a positive drainage network comprising gullies, pipes and manholes. The infiltration basin has been designed to provide attenuation for the 1-in-100-year storm event, with an additional 45% allowance for climate change.
- 8.73 Foul water will be discharged via a pumped connection to the existing public sewer to the south, subject to approval from Wessex Water.
- 8.74 In summary, the submitted Flood Risk Assessment and Drainage Strategy confirm that the site is not subject to flood risk and that surface water can be managed appropriately without increasing flood risk elsewhere. The proposals therefore accord with Core Policies 67 and 68 of the WCS and NPPF 2026 Policies F4 (Site-specific Flood Risk Assessment) and F7 (Ensuring development is safe from flooding).

Ecology and Biodiversity Net Gain

- 8.75 This application is accompanied by a Preliminary Ecological Appraisal (PEA) together with a Landscape and Ecology Parameters Plan and an Illustrative Landscape and Ecology Plan.
- 8.76 The PEA assessed the significance of on- and off-site habitats and the potential for protected species to use the site. Three SSSIs lie within 3km, along with the Bath and Bradford-on-Avon Bats SAC. The locality is characterised by calcareous landscapes and supports diverse bat species, including some of Wiltshire's largest Greater Horseshoe Bat populations.
- 8.77 On-site habitats mainly comprise hangar buildings, hardstanding and modified grassland, with smaller areas of more species-rich neutral and calcareous grassland, trees and boundary hedgerows. Some grassland contains calcareous indicator species, although not at levels associated with priority habitat. Hedgerows include a young hawthorn/blackthorn hedge and a native species-rich hedge along the western boundary.
- 8.78 No evidence of badgers was recorded, although an updated walkover is recommended at reserved matters stage. Hazel dormouse is considered unlikely due to limited connectivity. Brown hare has been recorded on site, and hedgehog are known nearby; therefore hedgehog highways and sensitive vegetation-clearance methods will be used. Reptiles, amphibians and invertebrates are considered unlikely due to limited suitable habitat.
- 8.79 The site has strongest potential for bats. Boundary vegetation provides good foraging and commuting habitat, and all three hangars contain potential roost features. Hangar 18 has moderate potential for day roosts and high potential for day and night roosts within its plant building. Bat surveys are ongoing.

8.80 The key findings are as follows:

- Statutory Designated Sites: Boundary vegetation supports SAC-associated bats, including confirmed Lesser Horseshoe night-roosting; mitigation delivered through bat-sensitive lighting and dark corridors; further bat surveys required.
- Non-statutory Designated Sites: Northern part of site overlaps Colerne Airfield LWS but supports only modified grassland; mitigation through biodiverse grassland and native scrub; no further surveys needed.
- Habitats: Loss of trees, hedgerows and grassland plus potential PROW-related pressure on off-site calcareous meadow; mitigation through retention, native planting, calcareous seed mixes and protective fencing; no additional surveys beyond BNG work.
- Bats: Lighting, roost loss and commuting disruption pose key risks; mitigation includes dark corridors, sensitive lighting, strengthened boundaries, a bat building and integrated boxes; emergence, activity and tree-roost surveys ongoing, with mitigation embedded in the parameters plan.
- Badger: No setts found but new ones could appear; no current mitigation required; update survey needed before RM or works.
- Other Mammals (Hedgehog, Brown Hare): Potential harm during clearance and loss of hare habitat; mitigation through hedgehog highways and sensitive vegetation clearance; no further surveys required.
- Birds: Risk to nesting birds and loss of nesting habitat; mitigation via seasonal clearance restrictions, pre-works checks and integrated bird boxes; no further surveys required.
- Reptiles & Amphibians: Potential harm during vegetation clearance; mitigation through sensitive clearance methods; no further surveys required.

8.81 The Landscape and Ecology Parameters Plan identify the measures incorporated to avoid, minimise and mitigate ecological effects while securing enhancements. This should be assessed alongside the other parameter plans.

8.82 The baseline BNG value of the site is 25.26 area habitat units and 4.27 hedgerow units. The completed baseline metric is provided separately. Based on the Illustrative Landscape and Ecology Plan, a provisional BNG of +10% is achievable, although some tree units may need to be purchased depending on final design.

8.83 Therefore, the proposal accords with Core Policies 11 and 50 of the WCS, Policies NE1 and NE2 of the CNP, and NPPF 2026 Policies N2 and N6.

Lighting

8.84 The application is accompanied by a qualitative obtrusive light statement for operational obtrusive light effects (preliminary) as a result of the proposed development. This recognises that the site includes artificial lighting associated with existing former hangars, high-level floodlights, and column-mounted luminaires, with additional operational and security lighting at Azimghur Barracks contributing to increased night sky brightness. The key findings of the assessment are as follows:

- **Precautionary Lighting Zone:** Although the site lies within an E2 Low District Brightness area, lighting will be designed to E1 Dark Sky thresholds to minimise vertical and horizontal spill toward sensitive receptors.
- **Residential Amenity:** Rear elevations of Round Barrow Close will remain within ILP obtrusive-light limits, with separation distances and careful luminaire design ensuring no additional mitigation is required.
- **Ecological Protection:** Perimeter buffers of 10 m (west, south, east) and up to 15 m (north) will be maintained as low-light corridors, with part-night operation and narrow-beam distribution preserving dark conditions essential for bat roosting, foraging and commuting.
- **Lighting Design Parameters:** Proposed luminaires use flat-glass, zero-tilt, 2700 K warm-white fittings with Dark Sky approval, PIR activation and 6 m mounting heights, reducing spill, glare, blue-light emissions, sky glow and energy use.
- **Landscape & Dark Sky Character:** Controlled luminaire placement, reduced blue-light output and part-night operation limit visual prominence in long-distance views and are expected to improve overall dark-sky character across the National Landscape

8.85 The qualitative assessment confirms that the external lighting strategy can balance operational needs with protection of residential amenity, ecological function and landscape character, with careful design and controls mitigating spill, glare and sky glow; forthcoming baseline measurements, detailed design and quantitative ILP/BCT assessments will refine mitigation and ensure the scheme remains appropriate to its sensitive rural and ecological context.

8.86 Therefore, the lighting strategy and embedded mitigation accord with relevant National Landscape and biodiversity policies and are consistent with saved Policy NE18 of the North Wiltshire Local Plan, Policy SE3 of the CNP, and NPPF 2026 Policy P3(e) (Artificial light impacts).

Sustainable Construction

8.87 The Design and Access Statement confirms that the design intent is to adopt a fabric-first approach, prioritising high levels of insulation and airtightness to reduce operational energy demand and improve sustainability. It also explains that the illustrative masterplan has been developed with consideration of passive solar gain, building orientation, green infrastructure and sustainable drainage. The proposed attenuation areas and SuDS features support sustainable water management and biodiversity enhancement across the site.

8.88 Given the open nature and orientation of the site, there are opportunities to incorporate roof-mounted PV panels, while garden sizes can accommodate air-source heat pumps or other renewable technologies where appropriate.

8.89 The Design and Access Statement explains that detailed design at reserved matters stage should aim to exceed minimum Building Regulations energy-performance standards where practicable and viable, and should have regard to the emerging Future Homes Standard. It also states that proposals should seek to incorporate::

- Electric vehicle charging infrastructure;

- Energy efficient lighting and appliances;
- Water efficiency measures;
- Sustainable drainage systems; and
- Passive solar design principles where appropriate.

8.90 Therefore, insofar as is possible at outline stage, the design intent is consistent with Core Policy 41 of the WCS, Policy BE5 of the CNP, and NPPF 2026 Policy DP3 (Key principles for well-designed places).

Noise

8.91 The application is accompanied by a Noise Assessment (Façade Assessment), which evaluates the existing environmental noise climate and the façade performance required to achieve appropriate internal noise levels within future dwellings. A detailed environmental noise survey established typical daytime and night-time noise levels at the site, forming the basis for the façade assessment.

8.92 Design criteria have been set with reference to BS8233:2014, WHO Community Noise Guidelines, Approved Document F and Approved Document O, covering both background ventilation and overheating scenarios. The façade assessment demonstrates that:

- A minimum façade attenuation of 25 dB is required to meet the most onerous background-ventilation condition, driven by maximum night-time noise events.
- Suitable minimum sound-reduction indices for windows and solid façade elements have been identified to ensure compliance with BS8233 internal noise limits under closed-window, background-ventilation conditions.
- For Part O overheating compliance, natural ventilation via openable windows is feasible, as external night-time noise levels fall below allowable façade limits for this mode.

8.93 Overall, the report concludes that the adoption of the façade performance recommendations outlined in Section 4.1, and the proposed development can achieve the required internal noise level criteria for both planning and Building Regulations purposes.

8.94 The report concludes that, with the façade performance recommendations set out in Section 4.1, the proposed development can achieve the required internal noise criteria for both planning and Building Regulations purposes.

8.95 At pre-application stage, comments were raised regarding potential noise and vibration impacts on future occupiers from air-source heat pumps (ASHPs) and from the nearest neighbouring properties. Although detailed layout is not for determination at this stage, the evidence indicates that an appropriate design solution for ASHPs can be achieved within the development.

- 8.96 In terms of neighbouring amenity, the closest existing dwellings are the semi-detached properties fronting Totts Lane. Once complete, the development will not adversely affect these dwellings, as the landscaped buffer will sit between the new built form and their rear boundaries. During construction, a Construction Environmental Management Plan (see Appendix 3 for a skeleton CEMP) will be required to manage and control amenity impacts for these properties, as well as those on Round Barrow Close and elsewhere.
- 8.97 Overall, the noise implications of the proposal are consistent with saved Policy NE18 of the North Wiltshire Local Plan, Core Policy 55 of the WCS, and NPPF 2026 Policy P3(d) (Noise impacts)

Ground Investigation

- 8.98 A Phase I Geo-Environmental Desk Study accompanies the application. The purpose of the report is to assess the presence and likely extent of any potential environmental hazards (soil, groundwater and ground gas) within the site.
- 8.99 The study notes that the site's historic use as an airfield, together with its current industrial use, presents potential sources of contamination including hydrocarbons, toxic metals and asbestos-containing materials. Potential receptors include future residents, construction workers and controlled waters, as the site lies above a Principal Aquifer. Potential pathways comprise direct contact with contaminated soils and the migration of contaminants through leaching into groundwater. The likelihood of contamination via these pathways is considered low, although the consequences would be moderate. The overall risk rating is therefore moderate-to-low, and further intrusive investigation is recommended. A Phase II investigation is anticipated at detailed design stage.
- 8.100 The Phase I study also considers risks associated with radon and unexploded ordnance (UXO). The site lies within a Radon Affected Area, with an estimated 5–10% of properties affected; basic radon protection measures are therefore recommended. In relation to UXO, the risk from German ordnance is assessed as low, while the risk from Allied UXO is assessed as medium. As a precaution, it is recommended that open excavation works are supported by a UXO specialist and that UXO Safety and Awareness Briefings are provided to all ground personnel.
- 8.101 It is considered that sufficient evidence has been provided to demonstrate that the proposal accords with Core Policy 56 of the WCS and NPPF 2026 Policy P2 (Ground conditions), subject to the recommended Phase II intrusive investigation being secured by condition prior to commencement of development.

Planning Balance

- 8.102 In addressing the planning balance, both the statutory test under Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the presumption in favour of sustainable development in Policies S3 and S5 of the NPPF are relevant.
- 8.103 Policy S3 of the NPPF sets out the presumption in favour of sustainable development and part 1b says that outside settlements policy S5 should be applied. The proposed development falls within two of the categories of development that should be approved unless the benefits of doing so would be substantially outweighed by adverse effects. These are:

- Redevelopment of previously developed land (S5(1)(d));
- Residential development addressing unmet housing need where the authority cannot demonstrate a five year supply (S5(1)(j)) where the development physically well related to an existing settlement and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure (S5(1)(j)(i)).

8.104 In applying this policy, Policy S5 says that 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.

8.105 Within the supporting documentation, we have thoroughly assessed the impacts from the proposals, and it is concluded that none of these would warrant a conclusion that the development should be refused under the wording of the NPPF policies. Of note, we conclude the following:

- In respect of the National Landscape, effects on the CNL are limited and localised, with the development relating well to the adjacent settlement and incorporating embedded mitigation that ensures very limited impact on the wider special qualities. It is our judgement that exceptional circumstances are shown to justify major development under the three categories set out in Policy N4:
 - There is a substantial, evidenced and urgent need for new housing development in Wiltshire, including within Colerne, with a five-year supply of only 2.16 years and a shortfall of 10,405 dwellings;
 - The site is previously developed land located entirely within the CNL, and because the whole parish lies within the designated landscape, any development to meet local housing needs must occur within the CNL; redevelopment of this specific brownfield site cannot be delivered elsewhere, and alternative locations would displace development onto greenfield land.
 - There will be no significant detrimental effects on the environment, landscape or recreational opportunities, as the LVIA confirms that existing airfield structures already moderate sensitivity and that embedded mitigation, including controlled building height, limited vegetation removal and strong landscape buffers ensures appropriate containment. The replacement of deteriorating hangars delivering a net enhancement to natural beauty and strengthening the village–countryside transition.
- In respect of habitats, although the site shows evidence of bat activity and lighting, roost loss and commuting disruption present key risks; mitigation including dark corridors, sensitive lighting, strengthened boundaries, a bat building and integrated boxes is embedded within the parameters plan.
- In respect of heritage assets, the principal impacts comprise the loss of three hangars of low heritage significance and a minor degree of harm to Colerne Airfield (low to medium significance), which can be appropriately mitigated through a proportionate programme of recording.

8.106 It is our judgement, none of these impacts mean that the development should be refused under the policies within the NPPF.

8.107 Policy S6: Neighbourhood plans and the presumption is also relevant since this is a housing development. It states that the benefits of approving development are likely to be substantially outweighed by the adverse effects where a proposal would conflict with a neighbourhood plan, providing two categories are met. These are (a) the neighbourhood plan became part of the development plan five years or less before the decision date; and (b) the neighbourhood plan contains allocations to meet its identified housing requirement.

8.108 In our view, the only in principle conflict with the CNP is that the site lies outside the settlement boundary, which also engages WCS policies that are themselves out-of-date. We acknowledge comments regarding development north of the C151, but this does not alter the position on policy.

8.109 The CNP was made in March 2022 and therefore falls within the five-year period until March 2027. However, it allocates only five dwellings against an identified need of 35–40 over the plan period and explicitly states that it *“cannot fully meet the plan period’s housing need”* (paragraph 3.31). As a result, the conditions in part 1b do not apply.

8.110 In summary, the Council’s spatial strategy is out-of-date due to its failure to deliver a sufficient supply of homes. The presumption in favour of sustainable development applies under the new NPPF and this says that planning permission should be granted unless the benefits of doing so would be substantially outweighed by adverse effects.

8.111 The positive benefits include:

- The provision of 150 new homes on a previously developed site will make a significant contribution towards meeting identified housing needs in Wiltshire, at a time when the Council is unable to demonstrate a five-year housing land supply (it can just show 2.16 years).
- The development will provide 17 affordable homes, contributing towards the delivery of affordable housing consistent with planning policy.
- By redeveloping previously developed land, the scheme will support the efficient use of land and reduce pressure for housing development on greenfield sites elsewhere in Wiltshire.
- The additional resident population will support the viability of local services and facilities within Colerne through increased spending, helping to sustain the village
- The development is expected to generate additional pupil numbers, which will assist in supporting the long-term sustainability of Colerne CofE Primary School, which currently has spare capacity.
- The construction phase will generate employment opportunities and expenditure within the local economy, with associated benefits extending through the construction supply chain.
- A high-quality indicative layout is shown in order to deliver a natural extension to Colerne to creating an attractive and well-connected neighbourhood.

- Generous areas of public open space are included in the indicative layout improving recreational opportunities for both existing and future residents.
- A substantial landscape buffer will be established around the development, helping to integrate the scheme into its surroundings while delivering ecological enhancements. The buffer will maintain a dark corridor for bats, supporting continued movement through the area and avoiding adverse effects on local bat populations.
- The scheme will deliver active travel improvements, including new footways and crossing facilities on Bath Road, enhancing pedestrian connectivity and accessibility. Improvements to Totts Lane and connections to existing public rights of way will improve access to local services, facilities and the wider CNL.

8.112 The loss of employment land is considered neutral, as the Employment Land Review provides clear justification for its release.

8.113 The negative impacts are limited, and with embedded mitigation are judged to be minor when set against the substantial benefits:

- Limited Effects on the National Landscape
- Possible negative impact on bat habitat, but embedded mitigation limits this impact
- Minor degree of harm to Colerne Airfield as a non-designated heritage asset.

8.114 Therefore, the development is of a category that should be approved unless the benefits of doing so would be substantially outweighed by adverse effects. This is a powerful material consideration in support of the proposed development.

8.115 In summary, the proposed development delivers a wide range of significant benefits which, when balanced against the limited and mitigated harms, clearly demonstrate that the benefits are not substantially outweighed by adverse effects. In accordance with Policies S3 and S5 of the NPPF and given the out-of-date spatial strategy and acute housing need, the presumption in favour of sustainable development applies. The evidence therefore provides a compelling justification for granting planning permission.

Overall Planning Assessment Conclusion

8.116 In summary, our findings are as follows:

- **Principle of Development:** The site's position outside the settlement boundary creates a degree of policy conflict, but its status as previously developed land, the absence of a five-year housing land supply, the lack of an up-to-date Local Plan and clear evidence that the land is no longer required or viable for employment use all substantially reduce the weight of that inconsistency. National policy strongly supports the reuse of previously developed land, and Core Policy 37 provides a relevant framework that aligns with the proposal even if not determinative. Taken together, the evidence demonstrates that the redevelopment of this well-located brownfield site for housing is justified in principle and supported by material considerations.

- **Effects on the National Landscape:** Although the site lies within the CNL, the LVIA confirms that effects are limited and localised due to the existing brownfield character, strong landscape containment and embedded mitigation. Replacing large utilitarian hangars with a landscape-led residential scheme enhances natural beauty and meets the statutory duty under Section 85. Exceptional circumstances are demonstrated through acute housing need, the requirement to reuse previously developed land, the lack of alternative locations within the parish and the economic and social benefits of redevelopment. Overall, the proposal accords with Core Policy 51, the CNP and the NPPF tests for development within a National Landscape.
- **Approach to Design and Character of Area:** The outline scheme establishes a landscape-led framework that responds to local distinctiveness, settlement-edge character and the transition between village and countryside. The indicative masterplan shows how development can be integrated through green infrastructure, open space and appropriate densities consistent with the wider village pattern. The proposals align with Core Policy 57 and the Wiltshire Design Guide, demonstrating that a well-connected, sensitively designed extension to Colerne can be achieved at reserved matters stage.
- **Trees and Landscape:** Existing vegetation and boundary features provide strong containment and are retained and reinforced to support landscape integration. The proposed buffers, open spaces and green corridors ensure that the development respects the settlement edge, enhances ecological value and contributes positively to the landscape structure of the CNL.
- **Heritage:** The heritage assessment identifies limited impacts, comprising the loss of three low-significance hangars and a minor degree of harm to the wider Colerne Airfield as a non-designated heritage asset. These effects can be appropriately mitigated through proportionate recording, and no unacceptable harm arises to designated heritage assets. The proposal therefore accords with relevant heritage policies and statutory duties.
- **Transport:** The scheme provides a safe and suitable access from Bath Road and establishes an internal movement structure to be refined at reserved matters stage. Active-travel improvements, including new footways, crossings and enhanced public-rights-of-way connections, will improve pedestrian accessibility and support sustainable movement patterns consistent with Core Policy 60 and national policy.
- **Flood Risk and Drainage:** A robust SuDS strategy is embedded within the masterplan, incorporating attenuation areas and multifunctional green infrastructure. These measures ensure effective surface-water management, reduce flood risk and deliver biodiversity enhancement in accordance with Core Policy 67 and national guidance.
- **Ecology:** The site's bat activity is addressed through a comprehensive mitigation strategy including dark corridors, sensitive lighting, strengthened boundaries, integrated roost features and a dedicated bat building. These measures are embedded in the parameters plan and ensure that ecological impacts are avoided or minimised, consistent with Core Policy 50 and national biodiversity objectives.

- **Lighting:** The lighting strategy adopts precautionary E1 thresholds, minimising spill, glare and sky glow to protect residential amenity, landscape character and bat ecology. Low-impact luminaires, dark corridors, part-night operation and careful orientation ensure compliance with ILP and BCT guidance and maintain dark-sky conditions within the CNL.
- **Sustainable Construction:** A fabric-first approach underpins the design intent, prioritising insulation, airtightness, passive solar gain and opportunities for renewable technologies such as PV panels and air-source heat pumps. Future Homes Standard principles, EV charging, water efficiency and SuDS integration ensure that the development can exceed minimum regulatory requirements and deliver long-term sustainability benefits.
- **Noise:** The façade assessment confirms that internal noise standards can be achieved under BS8233, WHO and Approved Documents F and O, with appropriate façade performance and ventilation strategies. Air-source heat pump noise can be addressed through layout and design, and construction impacts will be controlled through a Construction Environmental Management Plan, ensuring no unacceptable effects on future or existing residents.
- **Ground Investigation:** Site investigations demonstrate that the land is suitable for residential redevelopment subject to standard mitigation, with no constraints that would prevent the delivery of the proposed scheme.
- **Planning Balance:** The Council can demonstrate only a 2.16-year housing land supply, and development plan policies are out-of-date policies. The application scheme will contribute 150 homes to meeting the evidenced (and substantial) need for new housing. It will do so in manner that delivers substantial benefits including affordable housing, brownfield reuse, landscape enhancement, ecological gains, active-travel improvements and economic uplift. Adverse effects are limited and mitigated and it is evident that none of these effects would substantially outweigh the benefits that the application scheme will deliver.

9 Draft Heads of Terms for a Planning Obligation

- 9.1 Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, as amended requires planning obligations only to be sought when they meet all of the following tests:
- 'a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development.
- 9.2 The pre-application response listed Heads of Terms. At this stage, a full justification for each contribution has not been provided. Therefore, setting out these topics is for
- Affordable Housing
 - Education
 - Open Space and Play
 - Health
 - Public Transport
 - Off Site Highway Works
 - Public Art
 - Waste and Recycling
- 9.3 The applicant will work with the Council to agree the detail of these Heads of Terms during the determination process if they meet the statutory tests.

10 Summary and Conclusions

- 10.1 This Planning Statement supports a planning application at Colerne Industrial and Storage Park, Bath Road, Colerne SN14 8HT for the following development:

‘Outline application (with all matters reserved except access) for the demolition of existing buildings and structures and the erection of up to 150 dwellings (Use Class C3), with associated vehicular access from Bath Road and associated works including internal estate roads (illustrative), infrastructure, open space, landscaping and other works’

- 10.2 We have demonstrated that the site occupies a sustainable location on the edge of a large village and the village and wider Parish benefits from a range of local services including shops, medical facilities, recreation areas and a primary school all within walking distance. Regular bus services connect Colerne to Bath, Chippenham, Corsham and Marshfield, providing access to secondary schools, rail stations and wider employment opportunities. Safe pedestrian routes and suitable rural lanes for cycling further reinforce the site’s accessibility. These factors contribute to the site’s sustainable credentials.
- 10.3 There has been extensive historic engagement, including earlier applications, Parish Council feedback and Neighbourhood Plan considerations. Issues raised in the past relating to density, design, integration, access, affordable housing, landscape and ecology have directly shaped the current masterplanning approach. We have explained how concerns about settlement-edge character, landscape impact and access north of the C151 have been addressed through a landscape-led design, strengthened green infrastructure, improved pedestrian connections and a policy-compliant affordable housing offer.
- 10.4 The Illustrative Masterplan shows how up to 150 dwellings can be accommodated on the 7.1-hectare site, supported by green infrastructure, SuDS, biodiversity enhancements, public open space and appropriate access arrangements. Its form responds to site analysis, landscape considerations and pre-application feedback, ensuring a sensitive transition between the village edge and the surroundings. The indicative mix and resulting gross density of around 21 dwellings per hectare align with the character of nearby residential areas.
- 10.5 A built-form parameter plan defines a developable area of approximately 4.5 hectares, supported by generous landscaped buffers and a maximum ridge height of 9.5 metres. Landscape and biodiversity measures include retained vegetation, 10-metre ecological buffers, biodiverse grassland habitats, SuDs, a dedicated bat building and tree lined streets, all secured through long-term management.
- 10.6 Access will be taken from Bath Road via a priority junction, with improved pedestrian infrastructure including new crossings and a footway to the primary school and village. Additional active travel links will connect the site to the public rights of way network, with potential restrictions on Totts Lane enabling a traffic-free route to Silver Street. A wider recreational and connectivity route is also identified, linking rights of way west of the site with routes around Doncombe Lane.

10.7 Subject to the effects on the National Landscape other site-specific considerations, we concluded that the case for the principle of redevelopment of the application site for residential purposes is compelling. Our main points are as follows:

- The site is previously developed land, and both national and local policy give significant weight to redeveloping such sites, especially where they help meet identified housing needs.
- Any inconsistency with the spatial strategy carries reduced weight because the Council lacks a five-year housing land supply and the policies are not up to date.
- The development plan does not prohibit redevelopment of the site and although it lies outside the settlement boundary, the principle of development can be supported through a range of exemptions.
- The intent of Core Policy 37 aligns with the proposal even if it may not apply, because it is well related to the settlement, capable of accommodating residential uses and can enhance the character of the area.
- The site is not needed for employment purposes: it has poor strategic accessibility for employment purposes, has been marketed extensively without success, sits within an area with ample employment land supply, and cannot viably be redeveloped for modern employment uses.
- The scale of development is appropriate for a large village, supports local facilities, makes efficient use of previously developed land, and reflects densities consistent with national policy expectations.

10.8 When assessing the National Landscape effects and site specific issues, we concluded the following:

- National Landscape: LVIA shows effects are limited and localised. Removing hangars and delivering a landscape-led scheme enhances natural beauty. Exceptional circumstances are demonstrated through housing need, brownfield reuse and local economic benefits.
- Design and Character: A landscape-led, locally responsive framework integrates well with the settlement edge and reflects village character. The indicative masterplan shows a well-connected, sensitively designed extension.
- Trees and Landscape: Existing vegetation provides strong containment and will be reinforced. Buffers, open space and green corridors ensure a sympathetic settlement edge and ecological enhancement.
- Heritage: Impacts are limited to the loss of low-significance hangars and minor harm to Colerne Airfield as a non-designated heritage asset, mitigated through proportionate recording. No unacceptable harm to designated assets.
- Transport: Safe access from Bath Road and a logical internal layout. Active-travel improvements strengthen pedestrian connectivity and support sustainable movement.
- Flood Risk and Drainage: A robust SuDS strategy manages surface water effectively, reduces flood risk and provides biodiversity benefits.
- Ecology: Bat impacts are mitigated through dark corridors, sensitive lighting, strengthened boundaries and integrated roost features.

- Lighting: Low-impact lighting protects amenity, landscape character and bat ecology, maintaining dark-sky conditions.
- Sustainable Construction: Fabric-first design with opportunities for renewables, EV charging and water efficiency ensures long-term sustainability.
- Noise: Internal standards can be met, ASHP noise can be managed, and construction impacts will be controlled through a CEMP.
- Ground Investigation: Investigations confirm suitability for residential development subject to standard mitigation.

10.9 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications be determined in accordance with the statutory development plan unless material considerations indicate otherwise. In this situation, the planning policies are out of date and, under Policies S3 and S5 of the NPPF, the presumption in favour of sustainable development is engaged. The NPPF therefore requires that the application be approved without delay unless the benefits of doing so would be substantially outweighed by adverse effects. In the case of this site, the NPPF is a powerful material consideration.

10.10 The benefits of the proposal are substantial and include:

- The provision of 150 new homes on a previously developed brownfield site will make a significant contribution towards meeting identified housing needs in Wiltshire, at a time when the Council is unable to demonstrate a five-year housing land supply (it can just show 2.16 years).
- The development will provide 17 affordable homes, contributing towards the delivery of affordable housing consistent with planning policy.
- By redeveloping previously developed land, the scheme will support the efficient use of land and reduce pressure for housing development on greenfield sites elsewhere in Wiltshire.
- The additional resident population will support the viability of local services and facilities within Colerne through increased spending, helping to sustain the village
- The development is expected to generate additional pupil numbers, which will assist in supporting the long-term sustainability of Colerne CofE Primary School, which currently has spare capacity.
- The construction phase will generate employment opportunities and expenditure within the local economy, with associated benefits extending through the construction supply chain.
- A high-quality indicative layout is shown in order to deliver a natural extension to Colerne to creating an attractive and well-connected neighbourhood.
- Generous areas of public open space is included in the indicative layout improving recreational opportunities for both existing and future residents.
- A substantial landscape buffer will be established around the development, helping to integrate the scheme into its surroundings while delivering ecological enhancements. The buffer will maintain a dark corridor for bats, supporting continued movement through the area and avoiding adverse effects on local bat populations.

- The scheme will deliver active travel improvements, including new footways and crossing facilities on Bath Road, enhancing pedestrian connectivity and accessibility. Improvements to Totts Lane and connections to existing public rights of way will improve access to local services, facilities and the wider CNL.

10.11 Therefore, it is considered that planning permission should be granted.

List of Appendices:

- Appendix 1: Airfield Documentation
- Appendix 2: Extract from the Community Consultation
- Appendix 3: Skeleton CEMP
- Appendix 4: Waste Audit

Appendix 1



Ministry
of Defence

**Defence Airspace and Air Traffic
Management (DAATM)**

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Crawley
RH6 0YR

Email: [DAATM-
AirspaceConsultation@mod.gov.uk](mailto:DAATM-AirspaceConsultation@mod.gov.uk)

30 November 22

Dear Stakeholders,

**PROPOSAL TO DISESTABLISH THE COLERNE AERODROME TRAFFIC ZONE AND
FLIGHT RESTRICTION ZONE**

1. I am writing to inform you of some proposed changes regarding the airfield and airspace at Colerne. Bristol University Air Squadron flying activity was relocated to Boscombe Down several years ago and it has now been decided that there will be no further requirement for regular aviation activity at the unit. The airfield's runways and taxiways have already been marked up to show that the surfaces are disused. The Aerodrome Traffic Zone (ATZ) and Flight Restriction Zone (FRZ) are no longer required for the protection of aircraft at Colerne, thus will be disestablished.

2. Colerne currently has a standard Aerodrome Traffic Zone (ATZ), a circle of 2 nautical mile radius centred on 51 26 27.88N 002 16 44.68W from the surface to 2000ft Above Aerodrome Level, that is activated by NOTAM only. The Flight Restriction Zone¹, which is applicable to unmanned aircraft only, is currently active H24. There are two Helicopter Landing Sites (HLS) that will be retained for use by rotary aircraft operating to Azimghur Barracks. Additionally, there is a High Intensity Radio Transmission Area (HIRTA) at Colerne that is not associated with aviation activity and will remain in place.

3. The proposed Aeronautical Information Regulation and Control date for disestablishment of the ATZ and FRZ is 03/2023, which is effective from Thu 23 Mar 23. Aerodrome details will also be removed from Military Flight Information Publications by No 1 Aeronautical Information Documents Unit (AIDU) in AIRAC 13/2022, effective 29 Dec 22.

4. If you have any questions, concerns or comments regarding the proposal as outlined above, please contact the undersigned via email to discuss.

Yours faithfully,

Kate Read

K Read
Squadron Leader

¹ Dimensions can be found in [UK AIP ENR 5.1-89](#)



DAP1916 - Statement of Need

Tracking Code: **B2KZHCJ**

BEFORE YOU BEGIN

☒ Please ensure the contents of CAP 1616 Appendix A are referred to prior to completing this form. *

TYPE OF CHANGE

1. Category of Airspace Change

Does your proposal concern Changes to Notified Airspace Design or Planned and Permanent Redistribution of Air Traffic? *

☒ Changes to Notified Airspace Design ☐ Planned and Permanent Redistribution of Air Traffic

☐ Have you previously submitted a Statement of Need?

Please enter a title for this intended change, (max 80 characters): *

Disestablishment of Colerne ATZ and FRZ

2. Title of proposal

Which of the following categories is the proposal being progressed under? *

☒ Permanent ☐ Temporary ☐ Trial

SPONSOR

3. Change Sponsor Details

Please select the appropriate category and complete. *

☐ A Company
☒ An Unincorporated Association or other body
☐ Individual (including sole traders and partnerships)

3b. An Unincorporated Association

Name of Unincorporated Association or other body *

Ministry of Defence

Postcode

RH6 0YR

Country

Town/City

Crawley

Address

Aviation House

Telephone

E-mail

DAATM-AirspaceConsultation@mod.gov.uk

Website address

Primary Point of Contact Name *

[REDACTED]

☐

Requires Airspace Portal Access ?

Telephone *

[REDACTED]

Email *

[REDACTED]

Confirm Email *

[REDACTED]

Additional Contacts

You can add up to 4 additional contacts

+ Add Contact

STATEMENT OF NEED

Independent Aviation/Airspace Consultancy

☐

Is an Independent Aviation/Airspace Consultancy involved in this proposal?

Statement of Need

Please provide a brief 'Statement of Need' clearly explaining what the current/existing situation is **and** what issue or opportunity this proposal is seeking to address.

Further information can be found in CAP1616 *

The aerodrome at Colerne is now permanently closed and there is no requirement to retain the ATZ or FRZ, therefore they can both be disestablished. The Colerne HIRTA and HLS will remain in place as published.

- ☒ Does your proposal represent an administrative change to the Aeronautical Information Publication (Proposed Level 0 change)?

Please confirm below which section of the Aeronautical Information Publication your proposed change relates to. Please use this section to specify the exact details of the nomenclature and / or qualifying remarks you are proposing to change. If your proposal contains large amounts of information (e.g. multiple latitudes/longitudes) please supply the information on a separate email. *

ENR 2.2-1 Colerne ATZ (remove)
ENR 5.1-89/90 Colerne FRZ EG RU144A-E (remove)
VFR Charts
Military flight information publications will be updated by No 1 AIDU

Instrument Flight Procedures

- ☐ Does your proposal have the potential to include a change to and/or new IFPs?

Five-Letter Name Codes (5LNC)

- ☐ Does this request solely concern the reservation of new Five-Letter Name Codes (5LNC) in advance of a future proposal?

CAP1616 Part 1c

- ☐ Is the proposal being progressed against the requirements set out in CAP1616 Part 1c: Airspace Change Process for RNP Instrument Approach Procedures (IAPs) without an Approach Control Service?

DVOR / DME / NDB Rationalisation - RNAV Substitution

- ☐ Is the proposal being progressed against the requirements set out in CAP1781: VOR / DME / NDB Rationalisation: Guidance for the use of RNAV Substitution?

Secretary of State for Transport's priorities

- ☐ Is the proposal being progressed under any of the priorities set by the Secretary of State for Transport or any other CAA priority such as safety or national security?

Airspace Modernisation Strategy *

- ☒ Is the proposal supporting the delivery of the Airspace Modernisation Strategy? If not, please use the text box below to explain how the proposal is not inconsistent with the Airspace Modernisation Strategy

Supports the AMS in not retaining airspace restrictions once they are no longer required. MOD is committed to ongoing review of its airspace needs, alongside CAA airspace classification review team's work.

Additional Information

Please use the box below to add any further information which the CAA should be aware of when considering this submission (for example dependencies on other airspace change proposals and/or funding deadlines)

There is no current aviation activity or ATC based at Colerne, but a notification letter will be emailed to local airspace users (phone call if no email address available:
Garston Farm strip (within ATZ (345/1.25nm))
White Ox Mead Airfield
Lansdown
Charmy Down
Bathhampton
South Wraxhall
Corsham (Wadswick Farm)
Castle Combe
Doynton (Rookery Farm)
North Stoke
Bath/Lansdown
Winsley
Great Western Airports (Brown Shutters Farm Airfield)
Avon hang gliding and paragliding club
Dorset and Somerset Air Ambulance
Wiltshire Air Ambulance
Bath, Wilt, North Dorset Gliding Club
Bristol and Gloucestershire Gliding Club
RAF Keevil

Target AIRAC 02/2023 or first available after that date (mil updates will take effect AIRAC 13/2022). There are no associated SIs or other associated legislation.

SUBMISSION INSTRUCTIONS

Submission

Your form has been successfully submitted. Please keep a copy of this acknowledgement for your records.

Date and Time:

21 Nov 2022 1:45:57 PM

Application Submission Number:

DAP1916V2-575

Please note that the Airspace Regulation team will contact you to acknowledge receipt of your Statement of Need and to confirm the unique ACP reference number (ACP-YYYY-NNN) allocated to this submission. Following receipt of your unique ACP reference number, you will be required to create an associated airspace change proposal on the CAA's Airspace Change Portal (<https://airspacechange.caa.co.uk/>). Please refer to CAP 2385 Airspace Change Portal Important Information Guide.

Given the high number of new airspace change proposals (ACP), together with those proposals which are already in the system, it is possible that the proposal may not be assigned to a Technical Regulator/Account Manager immediately following submission of the Statment of Need. New proposal are allocated on a first come first served basis, unless the proposal is directly related to safety or national security matters, or as directed by the Secretary of State for Transport's priorities.

Once your submission has been assigned to an Account Manager/Case Officer, arrangements will be made for you to attend an Assessment Meeting. One of the key outputs from this meeting will be an indicative timeline for the proposed PPR. For Permanent changes, to enable the CAA to consider your proposed timescales, you will be expected to present dates for the following milestones at the Assessment Meeting:

- DEFINE Gateway
- DEVELOP & ASSESS Gateway
- CONSULT Gateway
- Formal Airspace Change Proposal Submission
- Target AIRAC

The CAA holds Gateway Assessment Meetings on a monthly basis and the annual schedule is published on the CAA's airspace change portal (<https://airspacechange.caa.co.uk/about-airspace-change/>).

Finally, you should also note that from September 2018 any amendments submitted by a Data Originator or ANSP for onward promulgation in the UK IAIP will be subject to the Aeronautical Data Quality Requirements. See Regulation (EU) No. 73/2010 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018 and [CAP 1054: Aeronautical Information Management \(https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=6808\)](https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=6808) guidance material for further information. These requirements will be discussed in greater details during the course of your intial meeting with the CAA.

When you have completed this form, click this button to submit the form for processing. Do not click this button more than once. You will then be provided with further instructions.

Appendix 2

4.0 COMMUNITY CONSULTATION

4.1 Various meetings have been held over the last two years or so with Colerne Parish Council and an open meeting that has also included local residents of the village. The meetings have involved presenting various potential redevelopment options for the site to the Parish Council and local residents to solicit feedback and help evolve the proposals in the lead up to the submission of the previous application. The meetings were held on 24th February, 11th August and 29th September 2015.

4.2 The initial meetings were used to discuss the principle of a comprehensive redevelopment of the site and what the proposals should/could include once a planning application is submitted to Wiltshire Council. The Parish Council accepted that a comprehensive redevelopment should be considered that includes a mix of residential properties, affordable housing and some commercial development. In considering the proposals, the Parish wanted the opportunity to solicit the view of the community before passing final judgement on the redevelopment of the site. To this end, a proposed indicative layout was left with the Parish Council on 11th August so residents could view the proposals for the site and also so they were made aware of the public meeting that was held on 29th September. The format of the public meeting held on 29th September and the issues raised during that meeting are outline below.

PUBLIC MEETING 29TH SEPTEMBER 2015 AT OLD SCHOOL, COLERNE

4.3 The meeting commenced with the development team providing an overview of the project and to also explain that the drawings left with the Parish were an attempt to provide the Parish with an overview of the comprehensive redevelopment of the entire site. The headlines in the development were 135 new dwellings of mixed tenure, 50 bed care home and 2 commercial units for start-up businesses and artisans. Within the development there would be a wildlife corridor around the site and the primary access off the Bath Road. It was also explained that the proposals were the backdrop to a long planning history, brownfield site and the need to provide more sustainable housing in the District. The proposals were produced to show a comprehensive scheme for the site with a balance

between a market viable development and a density suitable to the village. The density shown was also to reflect the density of surrounding development. It was explained that the application to be submitted would be in outline so the design of the dwellings would not be a key issue at this stage.

4.4 Questions were then invited from the public and were essentially on the following lines:

- a. Commercial traffic from the rear access was noisy and dangerous causing nuisance and disturbance to local residents. It was explained that the primary access would be from the Bath Road and therefore the intensity of use of this access point would be significantly reduced. It was also explained that the current access was unregulated and served the commercial uses in the hangars and should the development proceed these commercial uses would be removed and the local environment improved.
- b. The size of development would overwhelm the school and doctors surgery? It was explained that the capacity and school role would be looked at with the Council and should there be additional demand arising from the new population of children generated by the development, S106 monies would be paid to allow the Council to accommodate the growth accordingly. Equally, health provision would also be looked at in a similar fashion. Overall it was explained that the existing physical environment and infrastructure would be improved to accommodate the development.
- c. Was this phase 1 of a larger development? It was explained that the developer owned no further land and accordingly this was the full extent of the development in accordance with the wishes of the Parish to see a comprehensive redevelopment of the site.
- d. Concerns were raised that the density and design of the development was not in keeping with the local village and that more needed to be done to demonstrate that this was not just an alien bolt-on that had no relationship to the village. It was explained that the design concepts shown were conceptual at present and were brought together to show the Parish what a comprehensive development of the site could achieve. The proposal shown was

clearly not a finished or polished product and more work was required in conjunction with the local community in order to get the proposal right. What was necessary from the outset was local involvement on the primary concepts before a planning application was submitted. It was agreed that further work would be done on the visual aspects of the proposal to show that the development would engage the local vernacular and stand apart from a regular PLC housing estate.

- e. Integration was raised as an important aspect of the development to ensure that new and old knitted together. It was confirmed that social and physical integration would be essential and accordingly the design team had included green space and commercial uses that existing residents may use and cross the main road to access. It was agreed that more work needed to be done to ensure ease of access over the Bath Road.
- f. Traffic Calming. It was considered that the Bath Road was a fast and busy road and traffic calming should be looked at. It was suggested that traffic calming could be devised and delivered as part of the proposals in a design that was agreeable with the Parish even if the County felt it was not necessary. It was suggested that the design team pulled together traffic calming options for the Parish to look at.
- g. Traffic Congestion. Concerns were raised that the development would cause significant traffic congestion. It was confirmed that initial traffic studies had been undertaken that revealed that the capacity of the roads were sufficient to accommodate the development. It was also explained that whilst 135 dwellings and the associated cars appeared to generate large numbers, traffic would only flow out mainly during the peak period and this would be spread over a number of hours and therefore avoiding any additional congestion. It was confirmed that further highway work would be undertaken and if there was a need for any junction improvements this would be paid for by the development. It was also explained that the current use of the site is for an unfettered B8 use that has the ability to generate a high level of vehicular movements including heavy vehicles so any new development would need to be measured against this.
- h. Asbestos and reuse of material. It was confirmed that all the concrete would be crushed on site and potentially re-used. Any asbestos on site would be safely removed by the prescribed legislation to ensure that it would not be a hazard to human health.

- i. Housing requirement. It was set out that the Core Strategy had now found its housing supply and therefore what was the justification for this development? It was explained that whilst the Core Strategy had been adopted there was a need to maintain a 5 year housing land supply, which at present was not up to date. Therefore the development could be justified but irrespective of this it was also clear that the site was in a sustainable location and on a brownfield site and accordingly was a priority for development. A member of the Parish Council highlighted that the site formed part of the Core Strategy. It was also explained that the Government had expressed that there is no harm in providing more housing than required where this meets other government objectives.
- j. Ecology Survey. Could the ecology work be viewed and sent to the Parish Council?
- k. Foul drainage. Could the community see the drainage solution to the site and make comments accordingly.
- l. Had any work been undertaken with the CAA with regard to the runway?
- 4.5 Questions from the Parish centred around some of the points above but also included:
 - m. When will the planning application be submitted? It was suggested around Christmas 2015 or close to that.
 - n. Please ensure that there are dropped curb stones with the development for disabled access.
 - o. Please ensure that homes are future proofed to avoid unnecessary add ons and extensions and provide for a mix of house sizes and tenures.
 - p. Please avoid developments like the "Firs"
 - q. Please ensure that adequate parking is provided on the site.
 - r. A question arose about whether a need/demand had arisen for the care home. It was confirmed that no marketing had been done at this stage. It was considered that the Care Home should perhaps be substituted for bungalows or retirement housing where older people can down size and free up larger family homes. Could this be looked at?
 - s. Most considered that market affordable housing should be provided to allow first time buyers to get on the ladder. This should be prioritised over social rented housing.
 - t. Totts Lane. Could this be used as the primary point of access? It was explained that it could possibly be used

to improve connectivity but that it is a bit narrow and was also a bat corridor which would be enhanced further with landscaping.

SUMMARY

4.6 The public meeting provided a healthy debate on the development concepts. Overall it would appear, in general terms that the Parish were:

- Happy with the principle of residential development on the site and felt this could be advanced;
- Concerned about the overall density of development which needed to be clarified and justified;
- Concerned about the design and appearance of the development and felt strongly that it needed a local flavour to be acceptable and did not want a standard house type;
- Concerned about traffic issues;
- Concerned about integration;
- Wanted starter homes for younger people rather than regular social housing; and
- Wanted on-going dialogue with the developer to improve the design.

ACTIONS PRIOR TO SUBMISSION

- Provide perspectives and street scenes to show what the development could look like. These are provided with the application package.
- Show a pallet of materials to reflect the local vernacular. This is explained within the design and access statement.
- Provide a design statement to show how the proposed development has evolved and pulled in the local architecture. This, again, is detailed within the design and access statement.
- Provide a landscape scheme with the development. The landscape detailed are set out within the design and access statement and the landscape and visual impact assessment.
- Show a range of house types to be agreed and discussed with the Parish including sheltered accommodation. The proposals will provide a range of house types and sizes including affordable and retirement housing.

- Look at traffic calming along Bath Road and any junction improvements necessary. A roundabout is provided to give access to the site and slow traffic accordingly.
- Show an access junction to the site.
- Provide the Ecology work to the Parish. A copy of the ecological assessment is submitted with the application a copy of which has been sent to the parish council.
- The drainage solution for the proposed development is also detailed within the FRA and drainage statement supplied with the application.

4.6 Following the withdrawal of the above application, only limited discussions have been had with the Parish Council in the lead up to this application, given the detailed dialogue that has taken place surrounding the redevelopment of the site in the past that has been summarised above. Having said this, a brief discussion has been had with the Parish outlining the nature of the current proposals. The Chair of the Parish Council has said that the issues raised by the Parish in relation to the last application are likely to be the same with this submission. The Parish would like additional time to that allowed under a standard consultation period to consider this submission.

4.7 The key issue for the Parish from brief discussions that have taken place in the lead up to the submission of this application, is the need for the inclusion of a policy compliant level of affordable housing as part of the proposed development.

4.8 During the most recent discussions with the Parish Council it has been explained in this case that due to the previously developed nature of the site and the fact that the hangars are vacant, Government policy on Vacant Building Credit (VBC) comes into force. In simple terms, this means that the floor space of the vacant hangars can be off set against the affordable housing provision that would normally be required. This matter is explored in greater detail within the planning considerations section of the report. In simple terms the floor area of the hangars is greater than that proposed as part of the residential development. In this regard, in accordance with Government policy, no affordable housing can be sought.

Appendix 3

Colerne Industrial and Storage Park

Skeleton Construction Environmental Management Plan (CEMP)

A Construction Environmental Management Plan (CEMP) will be prepared by the Principal Contractor and submitted to the Local Planning Authority for written approval prior to commencement of development. The CEMP will set out the procedures, controls and mitigation measures necessary to manage and minimise environmental effects during the construction phase. It is expected to include:

- **Construction Traffic and Access Management:** Measures to manage construction vehicle movements, routing, delivery scheduling, wheel-washing, and integration with any approved Construction Traffic Management Plan (CTMP).
- **Dust and Air Quality Management:** Defined suppression measures, wheel-washing, damping-down protocols and monitoring arrangements to minimise dust and airborne particulates.
- **Noise and Vibration Control:** Measures to reduce construction noise and vibration, including strategic siting of plant away from sensitive receptors, acoustic screening, and adherence to agreed working hours in accordance with BS 5228.
- **Storage and Handling of Plant, Materials and Potential Contaminants:** Secure, bunded storage areas; controlled refuelling zones; and procedures to prevent accidental releases.
- **Spill Response Procedures:** Clear actions for containment, clean-up and reporting of any spillages, supported by on-site spill kits and trained personnel.
- **Quality, Safety, Health and Environment (QSHE) Management:** Implementation of a QSHE Plan setting out responsibilities, inspection regimes, and compliance monitoring.
- **Site Waste Management Plan (SWMP):** Measures for segregation, recycling, lawful disposal, and duty-of-care compliance for all construction waste streams.
- **Archaeological Oversight:** Provision for an archaeological watching brief during groundworks, including geotechnical investigations, with protocols for recording and reporting any finds.
- **Ecological Supervision:** Ecologist oversight during site clearance and any works affecting retained habitats, including timing restrictions and protection zones.

- Tree and Vegetation Protection: Management plans for retained trees and vegetation, including fencing, root protection areas and monitoring.
- Site Layout and Activity Zoning: A construction layout plan demonstrating how machinery, stockpiles and dust-generating activities will be located as far as practicable from sensitive receptors.
- Construction Lighting Strategy: A lighting design that avoids unnecessary spill, protects residential amenity, and minimises ecological impacts.
- Landscape and Planting Implementation: A scheme for temporary and permanent landscaping, including reinstatement measures and early planting opportunities where feasible.

Q+A Planning, July 2026

Appendix 4

Colerne Industrial and Storage Park

Waste Audit for Outline Application

Wiltshire Council's Waste Storage and Collection SPD require planning applications to demonstrate how waste will be minimised, stored and managed during both construction and occupation. The validation requirement is to provide details of means of minimising waste during the development process; and for encouraging post development recycling. The submitted documentation provides a proportionate approach since this is an outline application and the layout is not for approval and there is no contractor appointed.

Operational Waste (Household Waste and Recycling)

The Design and Access Statement establishes a clear movement and layout structure that enables compliant waste storage and collection at Reserved Matters stage. The internal street hierarchy and block arrangement ensure that dwellings can be served by appropriate bin storage areas, presentation points and collection routes without conflict with pedestrian or landscape features. The Transport Assessment confirms that the proposed access onto Bath Road and the internal road geometry can safely accommodate waste collection vehicles, with adequate turning provision and unobstructed access along the primary and secondary routes. Together, these documents demonstrate that operational waste can be stored, presented and collected safely and efficiently in accordance with Wiltshire's standards.

Construction Waste Management

The Skeleton CEMP provides a comprehensive framework for managing construction waste. It includes a Site Waste Management Plan covering segregation of materials, recycling, lawful disposal and duty-of-care compliance. The CEMP also sets out wider environmental controls that support waste minimisation, including secure material storage, pollution prevention, spill response procedures, dust and air-quality management, ecological supervision and construction traffic routing. These measures ensure that demolition waste from the hangars and construction waste generated during the build phase will be handled responsibly, with appropriate oversight and environmental safeguards.

Materials Efficiency, Embodied Carbon and Demolition Waste

The Design and Access Statement confirms that the detailed Sustainable Energy Strategy will address embodied carbon and demolition waste, supporting Wiltshire's objectives for material efficiency and waste reduction. The overall design approach promotes efficient use of materials and opportunities for recycling and reuse during construction. The removal of the large hangars provides further opportunity for responsible recovery and recycling of materials, reducing the volume of waste requiring disposal.

Integration with Site Layout and Environmental Management

The DAS and Skeleton CEMP together ensure that waste considerations are integrated into the wider environmental management of the site. Construction controls for ecology, arboriculture, lighting and pollution prevention reduce the risk of waste related environmental harm. The movement strategy and access design ensure that operational waste management is compatible with the site's landscape structure, ecological buffers and pedestrian routes.

Conclusion

The Design and Access Statement, Transport Assessment and Skeleton CEMP address comprise the Waste Audit. They demonstrate that operational and construction waste can be safely stored, collected and managed, and that the development aligns with the requirements of the SPD.

Q+A Planning, July 2026