

# Grafton NDP site allocations report: residential and commercial land

## Contents

1. The purpose of this report.....	4
2. Introduction and background to the site allocation process.....	4
3. Result of the Call for sites .....	5
4. Part 1: Residential allocation .....	6
5. The Housing Requirement .....	6
6. <i>The pool of residential sites</i> .....	7
7. Part 2: Economic Development land allocation.....	8
8. What next? .....	8
9. Appendix 1: Grafton NDP site selection methodology (February 2023) .....	10
10. Introduction.....	10
11. The site allocation process .....	11
12. Planning Policy Context .....	12
13. Assessment Criteria and planning conditions.....	12
14. Planning constraints maps.....	12
15. The Call for Sites .....	13
16. The Development Plan for Grafton Parish.....	14
17. Wilshire Core Strategy (2015).....	14
18. Kennet District Local Plan (2004).....	25
19. North Wessex Downs Area of Outstanding Beauty Management Plan 2019-2024 .....	26
20. Assessment Criteria based on planning policy review.....	30
21. Housing allocation .....	30
22. Employment Land Allocation.....	31
23. Appendix 2: Individual sites returned form call for sites .....	34
24. Appendix 3: Economic Development Land Allocation .....	57
25. Appendix 4: Site Assessment Matrix .....	62
26. Appendix 5: Analysis of 20/02218/FUL.....	63
27. Appendix 6: Parish Council Meeting Minutes.....	66

November 2024

Grafton NDP for Grafton Parish Council  
Site Allocation Report



## The purpose of this report

28. This report is an initial summary of the planning policy implications of the call for sites undertaken in support of the Grafton Parish Neighbourhood Development Plan. The call for sites occurred in summer 2023. This report is an initial summary for consideration by Wiltshire Council whether Strategic Environmental Assessment is required. If the response is affirmative, Grafton Parish Council will seek support from AECOM through Locality to have a suitable SEA Environmental Report prepared.

## Introduction and background to the site allocation process

29. On 25 April 2022, the Grafton NDP Steering Group (SG) together with Andrea Pellegram Ltd. led a community consultation event in the Coronation Hall. In that event, there was significant community support for new housing and commercial development in the parish which, due to its location in the countryside and the AONB, has not received a development allocation for some time. Residents wished to have some new homes to allow their community to grow sustainably and also hoped that they could perhaps have a shop or other community facility that would allow them to remain close to home whilst being able to do basic shopping.
30. The steering group explored these aspirations in the community survey which was undertaken over the summer of 2022. **Appendix 2 of the main NDP** shows the results of this survey. It also shows that the community wishes to have some new housing and a community shop of some description.
31. The steering group decided that given these community aspirations, it would be appropriate to run a call for sites in the parish where local landowners could put forward sites that might be available for limited development.
32. The steering group, working with their planning consultant Andrea Pellegram Ltd. prepared a methodology document for agreement with Wiltshire Council and the North Wessex Downs AONB Board. Neither organisation offered any specific advice on the wording or approach in the methodology and this was therefore, in the absence of comment, adopted by the steering group as the appropriate method. The full site allocation methodology, and the basis of this current report, is copied in **Appendix 1 below**.
33. The communication plan for the Call for Sites was agreed at the meeting of the Grafton Parish Council on May 15<sup>th</sup> 2023. Following this the Call for Sites began on May 16<sup>th</sup> and ran until July 28<sup>th</sup>, 2023. The communication attached was published on the Grafton Parish website and in the June edition of Grafton Parish News. It was posted on parish notice boards in each village and sent out by email to landowners.
34. This report has been prepared as set out in that 2022 methodology, but also pays regard to emerging policies in the Local Plan Review insofar as they are relevant, particularly with regard to the housing requirement.
35. This document is split into two parts:
- Part 1: Residential allocation;

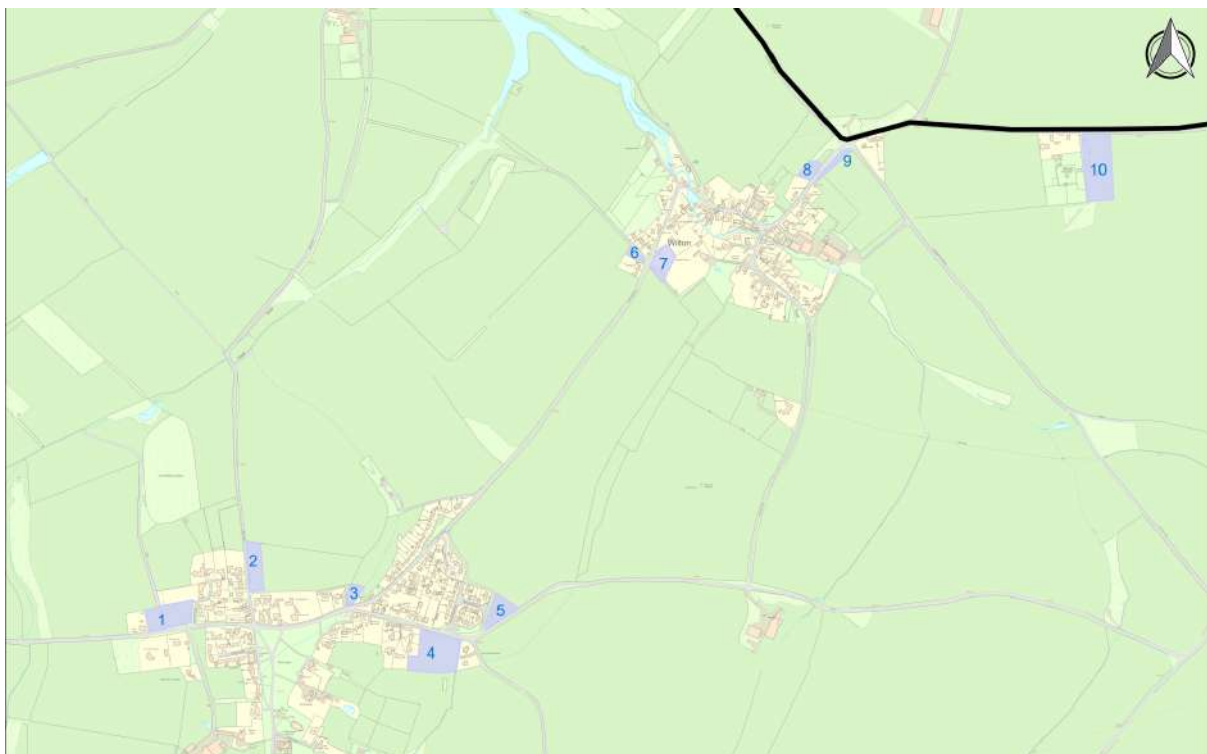
- Part 2: Commercial allocation.

36. **This document and its interim recommendations and conclusion will be provided to AECOM who will undertake a Strategic Environmental Assessment (SEA) of the proposed allocation. The information arising from the SEA will then be used to finalise the allocation proposals and any required mitigation will be included in the individual site allocation policies.**

### Result of the Call for sites

37. **Appendix 2** is a summary of the results from the call for residential sites. **Appendix 3** shows the results for commercial sites.
38. **Figure 1** shows the location of each site and the reference number that will be used to identify them.

**Figure 1: Sites put forward in the 2023 call for sites**



Source: Andrea Pellegram Ltd. under OS licence 100066489. SCALE 1:10,000

## Part 1: Residential allocation

### The Housing Requirement

39. In Spring 2023, the steering group sought assistance from Wiltshire Council. Whilst it had been established that the community of Grafton were in favour of new housing development through an allocation, the Council were consulted to ask if it had a view on the number of dwellings that the NDP should seek to provide. In an email from March 2023, the LPA wrote:

*In terms of identifying a number to plan for, you may be aware that Wiltshire Council are currently undertaking a review of our adopted Wiltshire Core Strategy (the 'Local Plan review') which will set new housing requirements for our next plan period (2020-2038) – including specific local level requirements to help guide neighbourhood plans. We are still in the process of working up the new Local Plan housing requirements so unfortunately, we cannot as yet provide you with a figure.*

*The Wiltshire Core Strategy (WCS) presents our current housing requirements, and covers the period 2006-2026. Within the WCS indicative housing requirements are provided at the county's larger settlements and within the rural 'community areas'. Grafton parish falls within the Pewsey Community Area. The council's most recent Housing Land Supply Statement (2021), which monitors the number of planning permissions that have been granted over the WCS plan period, shows that as at March 2021 the number of homes delivered in the Pewsey Community Area had already exceeded the indicative number of homes planned for the Pewsey Community Area up to 2026. However it should be noted that the WCS indicative requirements are 'at least' figures so should not be seen as a limit to options for further sustainable growth, where there is evidence to support it.*

*Until such time as we are able to share emerging Local Plan neighbourhood planning requirements, we'd recommend that a local housing needs survey is undertaken for your parish area which will identify the level of need for affordable housing in Grafton parish. This will help to build a robust evidence base for your neighbourhood plan in terms of identifying local affordable housing needs to be planned for.*

*We have put in a request with our colleagues in the council's Housing team for them to initiate a local housing needs survey for Grafton parish. Please be aware due to the number of requests for housing needs surveys and limited resources there is an expected delay on this service at the moment.*

40. In the event, Wiltshire Council did not have sufficient resources to undertake the survey or offer any further advice to the steering group.
41. The Local Plan Review Pre-Submission Review (July 2023) retains the approach in Core Strategy Policy 1 that development in Small Villages will be limited to respond to local needs and to contribute to their vitality. The additional consideration of vitality is a change from the previous Core Strategy approach which only allowed for housing to be provided to meet locally identified needs and that primarily for rural workers.

42. Emerging Local Plan Policy 2 allows for infill development in small villages and where it does not elongate the village or consolidate an existing sporadic loose knit area of development. Infill development is defined as “the filling of a small gap within the village that is only large enough for not more than a few dwellings, generally only one dwelling...”, however “...Exceptions to [infill will] be considered through the neighbourhood plan process or DPDs.”
43. Para. 3.47 of the emerging local plan acknowledges that neighbourhood plans will be a source of housing supply over the plan period. In para 3.53, for areas like Grafton where there is no identified housing requirement, the plan suggests that “an estimate is made of how many homes will be built over the plan period based on past performance”. Para 4.267 states that the reviewed Local Plan will not set out explicit requirements for parishes that only contain small villages (such as Grafton) however, this does not mean that there can be no growth in these areas.
44. Para 4.267 of the Pre-Submission draft local plan states:

*As set out in other policies in the Plan new housing development will be limited to infill within the built-up area of Small Villages or should be geared towards meeting local affordable needs through exception sites, or up to 20 homes, or 5% of the size of the settlement (whichever is the lower).*

45. **This indicates that the Grafton NDP could allocate a site, potentially as an exception site for 100% affordable or a lower figure if there was justification on the grounds of scheme viability); 20 homes; or 5% of 280 households (14 homes). However, this is not a requirement in the adopted Core Strategy, and the community consultation evidence indicates that there is a preference toward market housing, so allocations for market housing should also be explored.**

### ***The pool of residential sites***

46. The call for sites returned 9 sites which were proposed for residential development. These are summarised in **Table 1** and shown in **Figure 1** and they form the pool of sites from which selection will be made.

**Table 1: Pool of promoted residential sites**

Reference number	Site name	Settlement location
1	Land north of A338	East Grafton
2	Land east of Dark Lane	East Grafton
3	Land north of Wilton Road	East Grafton
4	Land south of A338	East Grafton
5	Land east of Hungerford estate	East Grafton
6	Land west of Grafton Road	Wilton

7	Land east of Grafton Road	Wilton
8	Land in North Wilton	Wilton
9	Land south of Roman Road	Wilton

47. These sites are assessed against the criteria from the methodology individually in **Appendix 2** (below). The assessment concluded that Site 1, and Site 4 and 5 jointly, were potentially suitable for housing and capable of delivering the needs identified in the community survey. The outcomes of the site assessment are provided at **Appendix 4** (below).
48. On 20<sup>th</sup> September 2024, the Parish Council conducted a consultation event to present the sites that were deemed potentially suitable. 60 people of the 720 who live in the parish attended the meeting and there was significant support for either or both sites to be allocated.

## Part 2: Economic Development land allocation

49. Only two sites were proposed for economic development, shown and assessed in **Appendix 3**: a farm shop in East Grafton and a Bakehouse Café in Wilton associated with the Wilton Windmill.

## What next?

50. The findings of the assessment were used to inform which sites should be ruled out from further consideration and which site(s) could be taken forward as an allocation.
51. This report will be passed on to AECOM for them to undertake the SEA for the sites that the Council decide should undergo further consideration
52. The site selection methodology set out the necessary steps to allow sites to be developed in Grafton which are repeated here. The steps highlighted in bold have already been completed:
- Parish Council agrees there is a need for a housing allocation.
  - A suitable method how to allocate land is agreed with the LPA. This includes the criteria that will be used to assess the suitability of individual sites. The proposed methodology was sent in an email to the LPA for comment (dated 20 Feb 2023).
  - The Parish Council undertakes a “call for sites” asking landowners to put forward land that they wish to be considered.
  - The sites are assessed against the criteria from the methodology. The findings of the assessment are used to inform which sites should be ruled out from further consideration and which site(s) could be taken forward as an allocation.
  - The SG seeks advice from the LPA on whether strategic environmental assessment (SEA) of any proposed allocations is required. If SEA is deemed to be required, the SG will commission an Environmental Report to be prepared which will consider all available sites.



- f. The sites are assessed against the criteria and results of the SEA, and a shortlist of suitable sites is prepared.
- g. The SG draws up proposals how the site should be developed and seeks agreement with the landowner that the provisions of the NDP are deliverable<sup>1</sup>.
- h. The final list of sites is agreed by the steering group. This may involve an element of community consultation.
- i. The site is allocated in the draft NDP including conditions for development. The conditions set out specifically how the site(s) should be developed including necessary infrastructure.
- j. The NDP is subject to community consultation (referred to as Regulation 14 consultation).
- k. The NDP is amended following consultation and submitted to the LPA who then undertakes further consultation (referred to as Regulation 16 consultation).
- l. The NDP, including the site allocation, is subject to an independent Examination.
- m. A referendum is held in Grafton Parish, and if the NDP passes with a majority, the NDP is “made”.
- n. Once the NDP is made, the site can be developed, subject to detailed planning approval.

## Appendix 1: Grafton NDP site selection methodology (February 2023)

### Introduction

53. Grafton Parish Council began to prepare its neighbourhood development plan (NDP) in Spring 2022. The Parish Council convened a steering group (the SG) to lead the process. The SG's first major activities were to hold a community meeting to agree the content and vision for the NDP and then to undertake an online survey of the residents to understand what they wished for the NDP to cover.
54. The survey of 78 responses indicated that around a third of respondents would consider moving within the parish if a home that met their needs was available. Most of the respondents (77%) would wish to purchase their new home rather than rent, and there was equal demand for 2, 3 and 4+ bedroom homes. Most of the respondents would be willing to pay over £1000 a month indicating that though there is some demand for affordable housing, this is not over and above what would normally be expected through Wiltshire Council's planning policies. When asked whether respondents would support the provision of new housing in the parish, 78% indicated that they would, though there was a strong preference for affordable housing being provided with restrictions for local people.
55. The survey also showed that 58% of local people must go outside the parish for shopping and 88% would support the creation of a new farm shop or community shop. The local shop would be desired to meet day to day needs of food and drink, cleaning products and toiletries, etc. More generally, there was 90% support for creation of new local businesses.
56. The SG has accordingly decided that the NDP should seek to allocate land for housing and employment.
57. A request was made to Wiltshire Council who are the Local Planning Authority (LPA) asking what the requirement for new housing in the parish was. WC indicated that East Grafton is classified as a Small Village, and as such falls outside of the scope of emerging Neighbourhood Plan requirements in the Local Plan – which only provides rural housing requirements for the Large Villages and Local Service Centres. As such proposed housing allocations in such locations would need to be underpinned by evidence to show an identified need, and to show that allocated sites are of an appropriate scale for the settlement.
58. This document is the first step in identifying suitable land for housing in Grafton Parish as an allocation in the NDP. Once this allocation is made and the NDP becomes part of the Wiltshire Development Plan<sup>2</sup> the identified land can be developed in the manner set out in the NDP. Without this allocation, it would be difficult for Grafton parish to secure any additional housing or employment because of the constraints posed by the North Wessex Downs AONB (which

<sup>2</sup> The Development Plan is defined to include the adopted Wiltshire local plan, in this case the Core Strategy, and any neighbourhood plans that have passed referendum and have been "made" (adopted) by Wiltshire Council. The full list of development plan documents are provided in a later section of this report.

entirely covers the parish), the countryside location and the significant heritage assets in the parish.

## The site allocation process

59. The stages of allocating land for development in a neighbourhood plan are summarised here:

- a. Parish Council agrees there is a need for a housing allocation.
- b. A suitable method how to allocate land is agreed with the LPA. This includes the criteria that will be used to assess the suitability of individual sites. The proposed methodology was sent in an email to the LPA for comment (dated 20 Feb 2023).
- c. The Parish Council undertakes a “call for sites” asking landowners to put forward land that they wish to be considered.
- d. The sites are assessed against the criteria from the methodology. The findings of the assessment are used to inform which sites should be ruled out from further consideration and which site(s) could be taken forward as an allocation.
- e. The SG seeks advice from the LPA on whether strategic environmental assessment (SEA) of any proposed allocations is required. If SEA is deemed to be required, the SG will commission an Environmental Report to be prepared which will consider proposed sites.
- f. The sites are assessed against the criteria and results of the SEA, and a shortlist of suitable sites is prepared.
- g. The SG draws up proposals how the site should be developed and seeks agreement with the landowner that the provisions of the NDP are deliverable<sup>3</sup>.
- h. The final list of sites is agreed by the steering group. This may involve an element of community consultation.
- i. The site is allocated in the draft NDP including conditions for development. The conditions set out specifically how the site(s) should be developed including necessary infrastructure.
- j. The NDP is subject to community consultation (referred to as Regulation 14 consultation).

<sup>3</sup> To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular: a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

- k. The NDP is amended following consultation and submitted to the LPA who then undertakes further consultation (referred to as Regulation 16 consultation).
- l. The NDP, including the site allocation, is subject to an independent Examination.
- m. A referendum is held in Grafton Parish, and if the NDP passes with a majority, the NDP is “made”.
- n. Once the NDP is made, the site can be developed, subject to detailed planning approval.

## Planning Policy Context

- 60. Grafton Parish has significant “planning constraints” which mean, in a practical sense, that it is difficult to obtain speculative planning permission for housing and commercial proposals in the parish. It is for this reason that the NDP seeks to allocate sites because in doing so, it will ensure that the sustainable growth of the community by only allowing that specific development.
- 61. It is acknowledged that a Local Plan review is currently underway. At the time of writing, a draft plan has been submitted to the planning inspectorate meaning that it can be given at least some weight in shaping this plan’s policies, particularly regarding the proposed spatial strategy and what this means for the distribution of development moving forward. In terms of Grafton, the draft spatial strategy continues to focus development away from the rural area to more sustainable locations, however, carries forward the notion that some development could be allowed at small settlements if brought through neighbourhood plans or rural exception sites. The draft plan is unlikely to dramatically alter the requirements for any site allocation in the parish.
- 62. A full policy review is included in **Appendix 1 [of the methodology]**.

## Assessment Criteria and planning conditions

- 63. The call for sites will ask for land either for housing or commercial development. Once the sites have been submitted to the SG, they will be assessed against the criteria shown in **Appendix 2 of the methodology**.
- 64. Any new development will need to meet the planning requirements of the Wiltshire Core Strategy. Until a site has been allocated and a scheme has been designed, it is not possible to understand the full extent of what that development needs to deliver. However, there are some basic requirements that are highly likely and these are set out as minimum planning conditions in **Appendix 3 of the methodology**.

## Planning constraints maps

- 65. A series of maps of the parish have been created and are available to view on the Parish Council’s website. These maps will assist potential site proposers to understand the constraints they face (in relation to the policies set out in Appendix 1 [of the methodology]) and also can be

used for those proposers who do not have access to online mapping to draw site outlines upon, if that is helpful.

## **The Call for Sites**

The call for sites will be limited to land within the parish boundary (the neighbourhood area) and only to land under the control or ownership of the proposers.

# APPENDIX 1 [of the methodology]: PLANNING POLICIES AND CONSTRAINTS

## The Development Plan for Grafton Parish

- Saved Policies from the Kennet District Local Plan – adopted April 2004
- Wiltshire Core Strategy – adopted January 2015
- Minerals and waste core strategies and development control policies (not included here)

## Wiltshire Core Strategy (2015)

Relevant extracts (not all policies are copied in total)	Relevance for the site allocation exercise
<p><b>Core Policy 1: Settlement Strategy</b></p> <p>Large and Small Villages Large Villages are defined as settlements with a limited range of employment, services and facilities. Small Villages have a low level of services and facilities, and few employment opportunities.</p> <p>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. The Large and Small Villages are: see area strategies, Chapter 5.</p>	<p>Core Policy 1 indicates that the parish is not appropriate for large-scale development. Only limited development will be allowed in small villages and will be difficult outside small villages (i.e. the open countryside).</p>
<p><b>Core Policy 2: Delivery Strategy</b></p> <p><b>Outside the defined limits of development</b></p> <p>Other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. <b>The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans.</b> At the Small Villages development will be limited to infill within the existing built area. Proposals for development at the Small Villages will be supported where</p>	<p>The policy indicates East Grafton is a small village where limited development will be possible. Outside these villages, opportunities for development will be limited to agricultural and small business purposes (including their on-site staff).</p> <p>This policy also makes it possible for the NDP to allocate land for housing and employment uses. Without an allocation, and only in East Grafton, development will only be allowed where it is infill, unless the proposal meets local needs.</p>

<p>they seek to meet housing needs of settlements or provide employment, services and facilities provided that the development:</p> <p>i) Respects the existing character and form of the settlement</p> <p>ii) Does not elongate the village or impose development in sensitive landscape areas</p> <p>iii) Does not consolidate an existing sporadic loose knit areas of development related to the settlement.</p>	<p>The NDP will meet local needs identified in the survey and will seek to allocate land for housing and employment.</p> <p>The allocation will need to be within the existing character of the parish, should seek to fit into a compact urban form with existing development.</p>
<p>4.25 The Core Strategy also includes 'exception policies' which seek to respond to local circumstance and national policy. In doing so these represent additional sources of supply to those detailed at paragraphs 4.22 and 4.24. These policies are listed overleaf:</p> <ul style="list-style-type: none"> <li>• Additional employment land (Core Policy 34)</li> <li>• Military establishments (Core Policy 37) • Development related to tourism (Core Policies 39 and 40)</li> <li>• Rural exception sites (Core Policy 44)</li> <li>• Specialist accommodation provision (Core Policies 46 and 47)</li> <li>• <b>Supporting rural life (Core Policy 48)</b></li> </ul>	<p>Exception sites are for 100% affordable housing (or for some cross-subsidising market rate development) which is not what the NDP is seeking to do. The housing requirements of the community have been informed by a local survey which concluded that there was an equal preference for 2, 3, and 4+ bedroom homes, and affordable dwellings.</p>
<p><b>Core Policy 3 Infrastructure requirements</b></p> <p>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.</p>	<p>The allocations will be required to accommodate necessary infrastructure requirements.</p>
<p><b>Core Policy 18 Spatial Strategy: Pewsey Community Area</b></p> <p>Small Villages: Alton Priors / Alton Barnes, Charlton St Peter, Chirton, <b>East Grafton</b>, Easton Royal, Ham, Hilcott, Little Bedwyn, Manningford Bruce, Marden, Milton</p>	<p>This confirms that East Grafton is the only small village in the parish.</p>

Lilbourne, Oare, Rushall, Stanton St Bernard, Wilcot, Woodborough and Wootton Rivers.	
<p><b>Core Policy 34 Additional employment land</b></p> <p>Outside the Principal Settlements, Market Towns and Local Service Centres, developments will be supported that:</p> <ul style="list-style-type: none"> <li>i. are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements; or</li> <li>ii. support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification; or</li> <li>iii. are for new and existing rural based businesses within or adjacent to Large and Small Villages; or</li> <li>iv. are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council.</li> </ul> <p>Where they:</p> <ul style="list-style-type: none"> <li>a. meet sustainable development objectives as set out in the policies of this Core Strategy and</li> <li>b. are consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity and</li> <li>c. are supported by evidence that they are required to benefit the local economic and social needs and</li> <li>d. would not undermine the delivery of strategic employment allocations and e. are supported by adequate infrastructure.</li> </ul>	<p>Any employment land allocation or policies must ensure that new sites are part of the existing settlements or linked to agriculture or are rural businesses. These businesses should serve local needs if possible. They must also not cause harm or disturbance to their neighbours.</p>
<b>Core Policy 39 Tourist development</b>	New tourism and visitor businesses would be appropriate in Grafton Parish and might



<p>Outside the Principal Settlements and Market Towns, tourist and visitor facilities should be located in or close to Local Service Centres or Large and Small Villages and, where practicable, be located in existing or replacement buildings. Any proposal needs to carefully consider the need to protect landscapes and environmentally sensitive sites with the objective of providing adequate facilities, enhancing enjoyment and improving the financial viability of the attraction. If new buildings are required in the countryside for tourist development, these should be directed towards the Local Service Centres and Large and Small Villages.</p> <p>In exceptional cases development may be supported away from the Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages where it can be demonstrated that all of the following criteria are met:</p> <ol style="list-style-type: none"> <li>i. There is evidence that the facilities are in conjunction with a particular countryside attraction.</li> <li>ii. No suitable alternative existing buildings or sites exist which are available for re-use.</li> <li>iii. The scale, design and use of the proposal is compatible with its wider landscape setting and would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas.</li> <li>iv. The building is served by adequate access and infrastructure.</li> <li>v. The site has reasonable access to local services and a local employment base.</li> </ol> <p>Extensions to existing facilities should be appropriate in scale to their location and help to ensure the future viability of the business, including farm diversification schemes.</p>	<p>be suitable to include in commercial land allocations, provided criteria are met. It would be preferable if tourism and visitor businesses were located in the existing settlements and not the open countryside.</p>
--	--

<p>Proposals for camping and touring caravan sites (including extensions) will be supported where they can be accommodated without adverse impact on the character and appearance of the landscape and meet criteria iii to v above.</p>	
<p><b>Core Policy 43 Providing affordable homes Provision</b></p> <p>On sites of five or more dwellings, affordable housing provision of at least 30% (net) will be provided within the 30% affordable housing zone and at least 40% (net) will be provided on sites within the 40% affordable housing zone. Only in exceptional circumstances, where it can be proven that on-site delivery is not possible, will a commuted sum be considered.</p> <p>The provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need, mix of affordable housing proposed and, where appropriate, the viability of the development. All affordable housing will be subject to an appropriate legal agreement with the council.</p> <p>This level of provision should be delivered with nil public subsidy, unless otherwise agreed by the council.</p> <p><b>Tenure</b></p> <p>Tenure will be negotiated on a site-by-site basis to reflect the nature of the development and local needs as set out in Core Policy 45 (Meeting Wiltshire's housing needs).</p> <p><b>On site distribution and standards</b></p> <p>Affordable housing units will be dispersed throughout a development and designed to a high quality, so as to be indistinguishable from other development. In determining the level of integration that can be achieved, consideration will be given to the practicalities of management and maintenance associated with the proposal</p>	<p>The housing allocation should include between 40% and 30% affordable housing depending on the size of the site.</p>

whilst still ensuring affordability, particularly in developments of flats.	
<p><b>Core Policy 45 Meeting Wiltshire's housing needs</b></p> <p><b>Type, mix and size</b></p> <p>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.</p> <p>Housing size and type, including any distinction between flats and houses, will be expected to reflect that of the demonstrable need for the community within which a site is located. The Wiltshire Strategic Housing Market Assessment identifies the housing needs of Wiltshire. Any variation to this will need to be justified through the production of new, sound evidence from either an updated Strategic Housing Market Assessment or other credible evidence source.</p> <p><b>In relation to affordable housing, other sources of credible evidence include the council's housing register and local needs surveys.</b></p>	<p>The community survey indicates that local demand is for an equal mix of 2/3/4+ bedroom properties.</p>
<p><b>Core Policy 48 Supporting rural life</b></p> <p><b>New shops</b></p> <p>New shops in villages will be supported where they are small in scale and would not threaten the viability of nearby centres. Farm shops will be supported where they utilise existing buildings, are small in scale and cause no unacceptable impact on nearby village shops or the character of the area.</p>	<p>New shops and farm shops to meet local needs are supported.</p>
<p><b>Core Policy 50 Biodiversity and geodiversity Protection</b></p> <p>Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered,</p>	<p>The Environment Act sets a minimum mandatory target of 10% Biodiversity Net Gain. This is different to the requirement for no net loss of local biodiversity resource which is required through Core Policy 50. Developments need demonstrate both 10% BNG in line with the Environment Act and no</p>

<p>and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.</p> <p>All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.</p> <p>Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy. 264</p> <p><b>Biodiversity enhancement</b></p> <p>All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.</p> <p><b>Local sites</b></p>	<p>net loss of local biodiversity resource in line with Core Policy 50.</p> <p>Site allocations should avoid land that is currently protected such as SSSIs, protected habitats, hedges, mature trees, and other areas that have high natural value.</p>
---	--

<p>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. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:</p> <ul style="list-style-type: none"> <li>i. cannot reasonably be avoided</li> <li>ii. are reduced as far as possible</li> <li>iii. are outweighed by other planning considerations in the public interest</li> <li>iv. where appropriate compensation measures can be secured through planning obligations or agreements.</li> </ul> <p>Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.</p>	
<p><b>Core Policy 51</b></p> <p><b>Landscape</b></p> <p>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. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:</p> <ul style="list-style-type: none"> <li>i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field</li> </ul>	<p>The allocations must pay regard to the North Wessex Downs AONB management plan.</p> <p>If it is the case that the NDP is subject to Strategic Environmental Assessment regulations, the Environmental Report and the NDP will need to consider the landscape implications of individual sites.</p>

<ul style="list-style-type: none"> <li>ii. boundaries, watercourses and waterbodies.</li> <li>iii. The locally distinctive character of settlements and their landscape settings.</li> <li>iv. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.</li> <li>v. Visually sensitive skylines, soils, geological and topographical features.</li> <li>vi. Landscape features of cultural, historic and heritage value.</li> <li>vii. Important views and visual amenity.</li> <li>viii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.</li> <li>ix. Landscape functions including places to live, work, relax and recreate.</li> <li>ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.</li> </ul> <p><b>Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas.</b></p>	
<p><b>Core Policy 52 Green infrastructure</b></p> <p>Development shall make provision for the retention and enhancement of Wiltshire's green infrastructure network, and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to:</p>	<p>The site allocations will also be required to provide "green infrastructure" which is landscaping, planting, retention of existing important trees and hedgerows, preservation of waterbodies, etc. Replacement green infrastructure may be required where it is necessary to lose what is already there.</p>

<ul style="list-style-type: none"> <li>i. retain and enhance existing on site green infrastructure</li> <li>ii. make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards</li> <li>iii. put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development</li> <li>iv. provide appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy</li> <li>v. identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.</li> </ul> <p>If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.</p>	
<p><b>Core Policy 58 Ensuring the conservation of the historic environment</b></p> <p>Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance.</p>	<p>Allocations should protect, conserve and enhance the historic features in Grafton Parish (listed buildings, scheduled monuments and Conservation Areas).</p>
<p><b>Core Policy 67 Flood Risk</b></p> <p>Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic</p>	<p>Allocations should not be in Flood Zones 2 and 3.</p>

<p>Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice.</p> <p>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.</p>	
<p><b>Core Policy 61 Transport and new development</b></p> <p>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.</p> <p>As part of a required transport assessment, the following must be demonstrated:</p> <ul style="list-style-type: none"> <li>i. That consideration has been given to the needs of all transport users, where relevant, according to the following hierarchy: a. Visually impaired and other disabled people b. Pedestrians c. Cyclists d. Public transport e. Goods vehicles f. Powered two-wheelers g. Private cars.</li> <li>ii. That the proposal is capable of being served by safe access to the highway network.</li> <li>iii. That fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development.</li> </ul> <p>Where appropriate, contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.</p>	<p>New development must have suitable and safe access and be accessible by sustainable modes of transport.</p>



## Kennet District Local Plan (2004)

Relevant extracts (not all policies are copied in total)	Relevance for the site allocation exercise
<p>Saved policy HC34 Recreation provision on large housing sites</p> <div data-bbox="323 616 738 1059" style="border: 1px solid black; padding: 10px;"> <p><b>Policy HC34</b></p> <p><b>RECREATION PROVISION ON LARGE HOUSING SITES</b></p> <p>In new residential developments of 20 or more dwelling units recreational open space will be required to be provided on the basis of 2.43 ha/1000 people, comprising:</p> <ul style="list-style-type: none"> <li>a. equipped play space - 0.31ha/1000 people</li> <li>b. casual play space - 0.41ha/1000 people</li> <li>c. formal sports/pitches - 1.71 ha/1000 people</li> </ul> </div>	<p>For an allocation of 20+ dwellings, these calculations will indicate the recreational provision requirements.</p>
<p>Saved policy HC35 Recreation provision on small housing sites</p> <div data-bbox="323 1171 738 1496" style="border: 1px solid black; padding: 10px;"> <p><b>Policy HC35</b></p> <p><b>RECREATION PROVISION ON SMALL HOUSING SITES</b></p> <p>New residential developments of between 5 and 19 dwellings, which do not form part of a larger scheme or potential scheme, will be expected to provide land for children's recreation on the basis of 0.72 ha/1000 people.</p> </div>	<p>For an allocation of 19 or fewer houses, these calculations will indicate the recreational provision requirements.</p>

<p>Saved policy HC37 Demand for Education</p> <div data-bbox="333 416 751 1106" style="border: 1px solid black; padding: 10px; background-color: #f8d7da;"> <p><b>Policy HC37</b></p> <p><b>DEMAND FOR EDUCATION</b></p> <p>In the case of new housing developments involving 25 or more dwellings or 1 hectare of land (irrespective of the number of dwellings) the Local Planning Authority will need to be satisfied (having regard to advice from the LEA) that the primary and secondary education needs of the population of the new development can be met either by existing school infrastructure or through improvements to the existing school infrastructure. A contribution towards improvement of the existing school infrastructure will be sought where there is evidence that demonstrates that the need for the improvement is a consequence of the new housing development. The contribution will be related to the education needs generated by that development.</p> </div>	<p>A housing scheme of 25+ houses or over 1 hectare of land will be required to make a contribution to education provision.</p>
---	---

## North Wessex Downs Area of Outstanding Beauty Management Plan 2019-2024

Relevant extracts (not all policies are copied in total)	Relevance for the site allocation exercise
<p>7.37 Key Issues Key issues with the potential to have significant influence on the AONB's Development Special Qualities:</p> <ul style="list-style-type: none"> <li>b) New large free-standing dwellings as replacement dwellings in the open countryside.</li> <li>c) The change of use of land to domestic garden use.</li> <li>d) The loss of rural character through suburbanising influences from new development (new fencing, lighting, signage, parking areas, paved</li> </ul>	<p>The allocation should be compact against the current built settlement form and should avoid individual developments in the open countryside.</p> <p>Gardens in the new allocation will not be so large as to create new building plots at a later date.</p> <p>Design including landscaping materials and external features will be in a style appropriate to the countryside.</p> <p>Where possible, previously developed land will be preferred for site allocations.</p>

<p>footpaths, loss of native hedgerows and creation of new garden areas).</p> <p>e) New housing developments on greenfield sites.</p> <p>f) The threat of incremental housing development outside settlements from conversions, redevelopments or rural workers' accommodation which are not clearly beneficial.</p> <p>g) Impact on dark skies and tranquillity of high-powered external lighting, especially where poorly directed or in an exposed location (not usually subject to planning control).</p> <p>o) Development that results in a material loss of tranquillity and/ or impact on the dark night skies within the North Wessex Downs or its setting.</p> <p>p) Development that does not provide for or support existing Green Infrastructure.</p>	<p>The new developments will be expected to provide a lighting strategy that preserves the tranquillity and dark skies of Grafton.</p> <p>The new developments will be expected to provide suitable green infrastructure, help nature connectivity and recovery and provide biodiversity net gain (10%).</p>
DE 02 Encourage high standards of design, comprehensive landscaping where required, traditional building styles, energy conservation and innovation that respect historic settlement patterns and the distinctive character of the North Wessex Downs	The new developments will be of a high quality and standard of development reflecting the historic building styles in Grafton Parish and will demonstrate high levels of energy efficiency.
DE 08 Avoid and reduce light pollution, including control of lighting schemes or other developments that threaten the integrity of dark night skies over the North Wessex Downs.	The new developments will prepare a lighting strategy that will protect the integrity of the dark skies over Grafton Parish.
DE 11 Encourage the use of planning briefs or master plans which guide developments within and on the edge of the North Wessex Downs and take account of AONB purposes	The NDP should contain site masterplans for the site allocations.

<p>DE 16 Encourage local communities to identify local needs and assist in the conservation and enhancement of local distinctiveness through the preparation and development of Neighbourhood Plans, Parish Plans, Village Design Statements, Neighbourhood Development Orders and other initiatives</p>	<p>The NDP will be a means for the local community to have a strong influence in future development in the parish.</p>
<p>DE 17 Encourage economic growth, new responsible tourism opportunities and diversification of the local economy within the overall aim of conserving and enhancing the natural beauty of the AONB.</p>	<p>New businesses in the parish are welcome where they are for local tourism or meet local needs.</p>
<p>8.18 Key Issues (community)</p> <p>e) Loss of affordable housing, reducing the social mix within settlements and leading to a loss of essential rural skills and services</p> <p>k) Opportunities and risks for the AONB associated with new instruments such as Neighbourhood Plans, which may form an increasingly important element of local decision-making.</p> <p>r) The need for local sources of employment and opportunities for local people to develop skills that could support them into self-employment or enterprise</p>	<p>The provision of affordable housing to meet local needs is supported.</p> <p>Support for local employment generating activities.</p>
<p>CO 04 Support projects to promote community use of renewable energy sources consistent with AONB objectives.</p>	<p>The allocations should produce renewable energy if possible.</p>
<p>CO 13 Support good practice examples of community approaches that respond to locally identified needs and promote them as an inspiration to others (e.g. the establishment of local housing trusts, support for new village shops, community transport schemes, etc.).</p>	<p>The AONB Management Board should support the NDP and its allocations.</p>

CO 14 Support communities in landscape-led approaches to enabling the availability of housing for identified local needs that will be – and will remain – genuinely affordable in perpetuity, consistent with AONB purposes.	The allocations should provide long-lasting opportunities for local people to live and work in Grafton Parish.
--	--

## Appendix 2 [of the methodology]: Assessment Criteria

### Assessment Criteria based on planning policy review

<b>Meets fully</b>	<b>Meets partially but could meet fully with mitigation</b>	<b>Fails</b>
--------------------	---	--------------

### Housing allocation

Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	
Deliverable	Will the development be completed within 5 years of when the NDP is made?	
Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	
Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	
Community survey	Can the site provide a range of 2-4+ bedroom homes?	
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	
Core Policy 50	Can the site provide 10% biodiversity net gain?	

Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	
Core Policy 61	Does the development have safe access on to the road network?	
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	

## Employment Land Allocation

Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	
Deliverable	Will the development be completed within 5 years of when the NDP is made?	
Core Policy 2	Is the site within or adjacent to either East Grafton or Wilton villages?	
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	
Core Policy 61	Does the development have safe access on to the road network?	


Core Policy 34	Is the site part of the existing settlements or linked to and existing agriculture or a rural business?	
Core Policy 34 and 39	Is the proposed site or business compatible with a countryside location (if not located in an existing settlement)?	
Core Policy 34	Does the proposal meet local needs?	
Core Policy 34	Will development on this site give rise to disturbance of neighbouring properties?	
Core Policy 39	Will the site be used for a new tourism or visitor business with a “link” to the location?	
Core Policy 39	Does the site have good road access?	
Core Policy 50	Can the site provide 10% biodiversity net gain?	
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	



## Appendix 3 [of the methodology]: Anticipated planning conditions (minimum)


- All planning applications will be accompanied by a site masterplan.
- Due to AONB location, any proposals submitted on allocated sites must be submitted in full (as opposed to an outline application).
- A Landscape and Visual Assessment will be required for any planning application.
- Appropriate Heritage assessments will be required for most planning applications.
- Allocations will be required to provide necessary infrastructure according to Core Policy 3.
- SUDS/permeable surfaces and good on-site surface water management will be required.
- Recreation provision will be made as appropriate.
- Biodiversity net gain of 10% will be achieved on-site if possible.
- Provision of necessary infrastructure according to the provisions of the Wiltshire Core Strategy will be provided.
- A lighting strategy that will preserve the Dark Skies status of Grafton Parish and the North Wessex Downs AONB will be prepared and delivered.

## Appendix 2: Individual sites returned form call for sites

1	Land north of A338	East Grafton
 <p>Scale 1:1250</p>		
<p>Proposal: The site area is 0.6ha, and its current use is agricultural land. There are no legal constraints on the use of this land for housing. We believe that the site is suitable for residential development, and capable of accommodating between 6 and 8 houses.</p>		
<p>Planning History: None</p>		
Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes
Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	Yes. The site lies between the main settlement and Park Cottage.


Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	Yes
Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	Yes
Community survey	Can the site provide a range of 2-4+ bedroom homes?	Yes. The size of the site is extensive and the proposal is for up to 8 houses. It should be possible to have a range of house types on this site.
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	Yes
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	The trees on site may be able to be accommodated in the development. Alternatively it may define the limits of the land parcel for development.
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	Yes
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	It is within the existing settlement and impacts would be localised to the village. There are no PROWs which the site may be visible from. As such will not have an unusual impact with appropriate design and mitigation.
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes, the existing farm track could be enhanced.

Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	<p>It is adjacent to but outside the Conservation Area. It is not near any listed buildings. Views of the green are blocked by existing development.</p> <p>PL/2024/07689 was approved for the development of a dwelling inside the conservation area on the opposite side of the road. The officer report confirmed this part of the historic setting of the conservation area has already been altered by virtue of the approved developments and it is considered that the proposed development would not result in such demonstrable harm to this part of the Conservation Area to warrant a reason for refusal.</p>
Core Policy 61	Does the development have safe access on to the road network?	Yes from the A338 or Grafton PI which are 30 MPH roads.
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1

2	Land east of Dark Lane	East Grafton
 <p>Scale 1:1250</p>		
<p>Proposal: The area of the site is 0.55ha and its current use is agricultural land. There are no legal constraints on the use of this land for housing. We believe that the site is suitable for residential development and capable of accommodating between 6 and 8 houses.</p>		
<p>Planning History: None.</p>		
Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes
Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	Yes. The development is tight against the current built up area, though it is on an undeveloped section of Dark Lane.


Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	Yes, however site adjoins settlement on two sides however would require landscaping to form new edge to settlement.
Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	Yes
Community survey	Can the site provide a range of 2-4+ bedroom homes?	Yes. The size of the site is extensive and the proposal is for up to 8 houses. It should be possible to have a range of house types on this site.
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	Yes
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No impact other than potentially a small loss of hedgerow to accommodate access in 30 MPH zone.
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	NA
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	Possibly in the short term. May lead to increased levels of light pollution. Long term, it is adjacent to the existing settlement and with appropriate design may not have an unusual impact.

Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	No likely provision needed
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	It is adjacent to but outside the Conservation Area. It is not near any listed buildings. Any impacts could be addressed through careful design.
Core Policy 61	Does the development have safe access on to the road network?	Dark Lane provides access to the site and is a narrow (single track road) and increased traffic would therefore cause access issues such as poor visibility splays.
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1

3	Land north of Wilton Road	East Grafton
 <p>© Crown copyright and database right. All rights reserved (NO OS LICENSE) 2023</p>		
Scale 1:1250		
<p><b>Proposal:</b> The site area is 0.1ha, and its current use is agricultural land. There are no legal constraints on the use of this land for housing. We believe that the site is suitable for residential development and capable of accommodating between 1 and 2 houses.</p> <p><b>Planning History:</b> none</p>		
Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes
Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	Yes
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	Yes



Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	No
Community survey	Can the site provide a range of 2-4+ bedroom homes?	No – the large plot size for 2 homes indicates larger home are preferred.
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	May be unviable due to number of units proposed.
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No impact
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	NA
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	The site is within the settlement and should not have an unusual impact on the AONB.
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes. There is a water feature running on the eastern boundary. This could be enhanced to provide an enhanced nature corridor.
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	Yes. It is currently a green gap within the conservation area and may have a harmful impact on its character.
Core Policy 61	Does the development have safe access on to the road network?	Yes, onto the A338.
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1.

4	Land south of A338	East Grafton
 <p>Scale 1:1250</p>		
<p>Site is a c. 0.9 hectare parcel of land located on the Southern Side of the A338 as motorists enter the village from the east. Proposal: Up to 15 houses and/or farm shop. Site is an open parcel of land which 'reads' as a paddock though is mainly used for storage of agricultural machinery etc.</p> <p>Planning History: Yes –</p> <ul style="list-style-type: none"> <li>18/11168/FUL: Erection of 15 dwellings with access onto A338, formation of bus stop lay-by on A338, parking and associated landscaping with change of use of agricultural land to residential garden land – refused 19/08/2019.</li> <li>20/02218/FUL: Repeat of above application in context of housing land supply shortfall.</li> </ul> <p>Application refused for following reasons:</p> <ol style="list-style-type: none"> <li>Conflict with Settlement Hierarchy and Delivery Strategy (Core Policy 1 and Core Policy 2) in the context of speculative development. <i>"...the limits of development may only be altered through identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans. The application site is not identified for development in a Development Plan Document or Neighbourhood Plan."</i></li> <li>Lack of 'exceptional circumstances' for 'major development' in the AONB for the purposes of NPPF para. 183 and footnote 64. The definition of 'major development' is a matter for the decision maker, in this case due to the number of units on the site. Notably, it is confirmed that landscape impacts would be localised and the</li> </ol>		


application could have been supported (including the AONB unit consultee and CPRE) with appropriate, sensitive design.

3. Lack of a legal agreement to secure essential infrastructure – there is no reason why this could not be delivered.
4. The market element of the proposal would fundamentally undermine Core Policy 44, meaning that it could not be supported as a speculative proposal otherwise it could risk setting a precedent for other developments elsewhere in the County.

Overall, the planning history suggests that the site may be suitable for development if appropriately designed and can meet local needs. There is extensive comment on the site from planning officers and statutory consultees which can inform the basis of a site allocation. Further analysis of planning application could be undertaken if site was proposed for allocation. It is important to note that Grafton Parish Council was in support of both applications which suggests it could possibly be supported again by the community as a proposed allocation.


Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes
Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	Yes. It is adjacent to the current developed area on three sides and therefore could logically fill an 'undeveloped gap'.
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	Yes. It adjoins development on three sites.
Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	Yes
Community survey	Can the site provide a range of 2-4+ bedroom homes?	Yes
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	Yes
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes

Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No impact. TPO on site would need to be protected.
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	Yes. No development within root protection zone of TPO.
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	Likely to be suitable. In 20/02218/FUL, AONB unit and CPRE supported application subject to sensitive design. Officer report confirms impacts would be localised and therefore it may be possible to identify an appropriate quantum and mitigation measures.
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes though there are no particular features of interest. This potentially could be informed by the planning history.
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	No impact. 20/02218/FUL confirms development to west screens the site from the conservation area. So not considered that the conservation area would be affected by the proposals. Neutral impact.
Core Policy 61	Does the development have safe access on to the road network?	Yes via the A338
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood zone 1

5	Land east of Hungerford estate	East Grafton
 Scale 1:1250		
Proposal: up to 3 houses. No planning history.		
Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes
Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	Yes. It is adjacent to the existing settlement at Hungerford estate.
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	Yes
Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	Not specifically on this site – however it is the same title as site 4 and


		could be delivered jointly.
Community survey	Can the site provide a range of 2-4+ bedroom homes?	Potentially.
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	May be unviable due to number of units proposed.
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No impact
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	NA
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	Requires further assessment. It is adjacent to the built up area and development adjoining the site is visible meaning there will be limited change in character from the A338, however, immediate views of the site from a small section of PRoW 'GRAF2' may be negatively impacted.
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes – the existing track could be enhanced for sustainable transport access
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	No
Core Policy 61	Does the development have safe access on to the road network?	Safe access could be created from Hungerford Road.

Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1
----------------	--	--------------

6	Land west of Grafton Road	Wilton
		
Scale 1:1250		
Proposal: up to 3 houses. No planning history. Site is grassed area of approx. 0.2 ha. Large hedgerow/trees along northern edge.		
Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes
Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	Yes
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	Yes since it is infill between Chapel Hill cottage and the Wilton settlement.
Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	No




Community survey	Can the site provide a range of 2-4+ bedroom homes?	Not likely due to the small number of dwellings proposed.
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	May be unviable due to number of units proposed.
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No impact
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	Adjoining hedgerows / trees should be retained. Tree survey may be required.
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	No since it is infill for an existing settlement and site is well screened.
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes but there are no particular features to enhance presently identified.
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	No.
Core Policy 61	Does the development have safe access on to the road network?	Yes via Grafton Road and the farm track to the north of the site.
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1.


7	Land east of Grafton Road	Wilton
 <p>Scale 1:1250</p>		
<p><b>Proposal:</b> The site area is 0.3ha, and its current use is agricultural land. There are no legal constraints on the use of this land for housing. We believe that the site is suitable for residential development and capable of accommodating 4 houses.</p> <p><b>Planning History:</b> Yes –</p> <ul style="list-style-type: none"> <li>• K/81/1157: Two detached dwellings. Refused 25/02/1982.</li> <li>• 19/01332/FUL: Change of use of land from agricultural to domestic garden and construction of swimming pool. Approved 08/05/2019. [Note: proposed site is still agricultural whilst land to the north was changed to domestic curtilage.</li> </ul>		
Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes

Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	Yes but it is on the outskirts of Wilton on land that is currently agricultural in character. It is not infill.
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	Partially. The land to the north of the site was agricultural land until 2019.
Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	No
Community survey	Can the site provide a range of 2-4+ bedroom homes?	Not likely due to the small number of dwellings proposed.
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	May be unviable due to number of units proposed.
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No impact
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	NA
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	Possibly. It is currently agricultural in character and forms part of the agricultural character of Wilton. PRow GRAF8 passes through/openly adjoins the site.
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes the farm track could be enhanced for sustainable transport and/or natural corridor.

Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	No, it is adjacent to the conservation area but this connection is limited and therefore any harm could be mitigated through careful design.
Core Policy 61	Does the development have safe access on to the road network?	Yes on the Grafton Road and the farm track to the south of the site.
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1

8	Land in North Wilton	Wilton
		
Scale 1:1250		
Proposal: up to 3 houses		
Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes
Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	Limited connection. Site is separated by a large hedgerow buffer. Adjoining property is a cottage disconnected from the wider settlement.
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	No. It would create a new linear spur to the north of the settlement.

Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	No
Community survey	Can the site provide a range of 2-4+ bedroom homes?	No
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	Not likely due to the small number of dwellings proposed.
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No impact
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	NA
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	Yes. It would create a linear spur to the existing compact settlement.
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes but no particular features
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	Yes, it is adjacent to the conservation area but this could be mitigated through careful design.
Core Policy 61	Does the development have safe access on to the road network?	Yes on Wilton Road
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1


9	Land south of Roman Road	Wilton
 <p>Scale 1:1250</p>		
Proposal: Up to 3 houses		
Planning policy	Assessment Criteria	Result
Deliverable	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes
Core Policy 2	Is the site within or adjacent to East Grafton, Wilton or other built up areas?	Yes
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	No. It would create a new linear spur to the north of the settlement.
Core Policy 33	Can the site provide 30% affordable housing on-site (for a site of 10 or more dwellings or larger than 0.5 ha)?	No




Community survey	Can the site provide a range of 2-4+ bedroom homes?	Not likely due to the small number of dwellings proposed.No
Core Policy 41	Can the proposal incorporate design measures to reduce energy demand and reduce carbon emissions?	May be unviable due to number of units proposed.
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No impact
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	NA
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	Yes. It would create a linear spur to the existing compact settlement.
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes but no particular features
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	It might have an impact upon the listed building at Wilton Hill but this could be controlled through careful design.
Core Policy 61	Does the development have safe access on to the road network?	Yes on Wilton Road
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1



### Appendix 3: Economic Development Land Allocation

4	Land south of A338	East Grafton
		
Scale 1:1250		
Planning policy	Assessment Criteria	Result
Available?	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes
Core Policy 2	Is the site within or adjacent to either East Grafton or Wilton villages?	Yes
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	Yes
Core Policy 61	Does the development have safe access on to the road network?	Yes via the A338.
Core Policy 34	Is the site part of the existing settlements or linked to an existing agriculture or a rural business?	Yes – it is within the East Grafton

		Settlement in an infill site.
Core Policy 34 and 39	Is the proposed site or business compatible with a countryside location (if not located in an existing settlement)?	NA
Core Policy 34	Does the proposal meet local needs?	Yes
Core Policy 34	Will development on this site give rise to disturbance of neighbouring properties?	No, impacts can be mitigated through design.
Core Policy 39	Will the site be used for a new tourism or visitor business with a “link” to the location?	Yes – it is presumed that the farm shop would provide locally produced goods.
Core Policy 39	Does the site have good road access?	Yes
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	NA
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	No
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	It is adjacent to but outside the conservation area. It will require sensitive design to ensure that it complements the character of the conservation area.
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1

10	Land east of the Wilton Windmill	Wilton
		
Scale 1:1250		
<p>Proposal is for a café to serve visitors of the adjoining Wilton Windmill – which is a tourist destination. Wilton Windmill is separated from the site by a large hedgerow and is Grade II* listed. Plans have been submitted in support of proposals. Provides an opportunity to enhance the appreciation of the asset and improve infrastructure to support tourist destination by increasing footfall and provide parking.</p> <p>Planning history: Yes –</p> <ul style="list-style-type: none"> <li>17/11620/FUL: Construction of a (relocated) 18th century timber/brick granary. Approved 01/05/2018.</li> <li>K/33994: Provision of a refurbished Shepherds hut to form additional tourist facilities. Approved 04/04/1997.</li> </ul>		
Planning policy	Assessment Criteria	Result
Available?	Is the site available now?	Yes
Deliverable	Will the development be completed within 5 years of when the NDP is made?	Yes

Core Policy 2	Is the site within or adjacent to either East Grafton or Wilton villages?	No but adjacent to an existing tourism destination (see policy 39 below)
Core Policy 2	Does the site allocation fit tightly against existing development so that it creates a compact urban form?	No but adjacent to an existing tourism destination (see policy 39 below)
Core Policy 61	Does the development have safe access on to the road network?	Yes
Core Policy 34	Is the site part of the existing settlements or linked to and existing agriculture or a rural business?	Yes adjacent to existing tourist attraction
Core Policy 34 and 39	Is the proposed site or business compatible with a countryside location (if not located in an existing settlement)?	Yes
Core Policy 34	Does the proposal meet local needs?	Yes
Core Policy 34	Will development on this site give rise to disturbance of neighbouring properties?	No
Core Policy 39	Will the site be used for a new tourism or visitor business with a "link" to the location?	Yes
Core Policy 39	Does the site have good road access?	Yes
Core Policy 50	Can the site provide 10% biodiversity net gain?	Yes
Core Policy 50	Does the site avoid the loss or harm to natural features of ecological value?	No
Core Policy 50	Can natural features of ecological value be protected over the lifetime of the development?	NA
Core Policy 51	Is the proposal likely to have a harmful impact on the AONB landscape?	The site is within the open countryside. The development proposed would need to be

		managed through careful design.
Core Policy 52	Can the proposal make appropriate provision for green infrastructure?	Yes
Core Policy 58	Is the proposal likely to have a harmful impact on the historic environment (listed buildings, Conservation Areas and Scheduled Monuments)?	The proposal would need to be sensitively designed. Any harm may be able to be balanced against the unique benefits of the proposal.
Core Policy 67	Is the site located outside Flood Zones 2 and 3?	Flood Zone 1

## Appendix 4: Site Assessment Matrix

Site:	1	2	3	4	5	6	7	8	9	10
Deliverable?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Available?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Adjoins Settlement?	✓	✓	✓	✓	✓	✓	?	?	✓	-
Compact Form?	✓	?	✓	✓	✓	✓	?	✗	✗	-
Tourism/ <del>agri</del> connection?	-	-	-	✓	-	-	-	-	-	✓
Affordable Housing?	✓	✓	✗	✓	?	✗	✗	✗	✗	-
Meets local Needs?	✓	✓	✗	✓	?	✗	✗	✗	✗	✓
Sustainable Design?	✓	✓	?	✓	?	?	?	?	?	✓
BNG?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
No Ecology Constraints?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Ecological Mitigation	✓	-	-	✓	-	?	-	-	-	-
No AONB Impact?	?	?	✓	✓	?	✓	?	✗	✗	?
Green Infrastructure?	✓	-	✓	✓	✓	✓	✓	✓	✓	✓
No Historic Impact?	?	?	✗	✓	✓	✓	✓	?	?	?
Suitable Access?	✓	✗	✓	✓	?	✓	✓	✓	✓	✓
Flood Zone 1?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Potentially suitable?	✓	-	-	✓	✓	-	-	-	-	✓

## Appendix 5: Analysis of 20/02218/FUL

72. On 9<sup>th</sup> of July, 2020, planning permission was refused on the site for the erection of 15 dwellings with access onto A338, formation of bus stop layby on A338, parking and associated landscaping with change of use of agricultural land to residential garden land.
73. The application followed a refusal decision in August 2018 for an identical proposal (ref. 18/11168/FUL). The application was submitted as a repeat application due to the Council's Housing Land Supply being under 5 years, which the applicant argued had triggered Paragraph 11(d) of the NPPF – the 'tilted balance' or 'presumption in favour of sustainable development'.
74. The application was refused for the following reasons:
- Conflict with Settlement Hierarchy and Delivery Strategy (Core Policy 1 and Core Policy 2) in the context of speculative development. *"...the limits of development may only be altered through identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans. The application site is not identified for development in a Development Plan Document or Neighbourhood Plan."*
  - Lack of 'exceptional circumstances' for 'major development' in the AONB for the purposes of NPPF para. 183 and footnote 64. The definition of 'major development' is a matter for the decision maker, in this case due to the number of units on the site. Notably, it is confirmed that landscape impacts would be localised and the application could have been supported (including the AONB unit consultee and CPRE) with appropriate, sensitive design.
  - Lack of a legal agreement to secure essential infrastructure – there is no reason why this could not be delivered.
  - The market element of the proposal would fundamentally undermine Core Policy 44, meaning that it could not be supported as a speculative proposal otherwise it could risk setting a precedent for other developments elsewhere in the County.
75. Overall, the planning history suggests that the site may be suitable for development if appropriately designed and can meet local needs. There is extensive comment on the site from planning officers and statutory consultees which can inform the basis of a site allocation. Further analysis of planning application could be undertaken if site was proposed for allocation. It is important to note that Grafton Parish Council was in support of both applications which suggests it could possibly be supported again by the community as a proposed allocation.
76. To inform the requirements for allocation of site 4 – which the site assessment has indicated is the most likely to be potentially suitable for allocation – this report has been prepared to understand the issues raised to inform the basis a potential site allocation.

<b>North Wessex Downs AONB</b>	"The proposal would have harmful visual effects... by reason of the size/quantum of development and the insensitivities of the design... failing to protect, conserve or enhance the visual amenities of the
------------------------------------	--



	landscape hereabouts." <b>A Landscape and Visual Impact Assessment (LVIA) should accompany the application.</b>
<b>'Major Development'</b>	"The proposal - for 15 dwellings on a c.0.9 ha site - comprises 'major' development. As there are no exceptional circumstances... planning permission should be refused for major development, as set out in the NPPF." <b>Consider reducing the quantum of units.</b>
<b>Landscape Impacts</b>	The officer report highlights concerns about landscape and visual impacts. A full application would allow the impacts to be fully defined. "The proposal would be detrimental to the Landscape Character Area (LCA)." <b>A full application submission (including landscaping) is recommended ensure it addresses these impacts.</b>
<b>East Grafton Conservation Area</b>	"A relatively small part of the west side of the site lies within the East Grafton Conservation Area." <b>The report suggests a neutral impact, but a Heritage Technical Note should accompany the proposal to confirm this.</b>
<b>Tree Protection</b>	"The oak tree, T15, will be located within one new residential garden... The new development will increase the pressure for future pruning to control crown growth." <b>An Arboricultural Impact Assessment is recommended.</b>
<b>Ecology</b>	"The southern site boundary is likely to be an important wildlife corridor including for bats and is recommended for retention as a well-established dark vegetation corridor." <b>A Ecological Assessment, Landscape and Ecological Management Plan (LEMP) and a lighting strategy should accompany the proposal.</b>
<b>Lighting</b>	"No street lighting is proposed which is welcomed by the AONB unit, dark skies are a special quality of the AONB." <b>The lighting strategy should avoid street lighting to maintain dark skies and prevent disturbance to protected species.</b>
<b>Renewable Energy and Sustainable Design</b>	"There are no indications of the use of heat pumps, solar panels, or grey water recycling... it is vital that sustainable measures for heating and for conservation of water resources should be employed." <b>A sustainability statement is needed to address these aspects.</b>
<b>Amenity</b>	"Residential amenity – loss of views/outlook from adjoining houses. Disturbance during construction." <b>The design should ensure no loss of privacy / amenity to adjacent properties, and a construction management plan is needed to help mitigate disturbances.</b>
<b>Design</b>	"The dwellings would be of 'traditional cottage designs with use of local materials'... however, the design should be refined further." <b>The materials and design should reflect the rural and historic character of Grafton and enhance the AONB.</b>



<b>Mix/Type</b>	"There is a requirement to provide 6 affordable units within a scheme of 15 dwellings... this would meet the policy requirement and assist in addressing the need for affordable housing in the Pewsey Community Area." <b>Ensure the housing mix reflects community survey findings and local needs for a range of market and affordable units.</b>
<b>Drainage</b>	"The plans need to ensure that surface water drainage from the development is carried away from the A338 and the village." <b>A Drainage Strategy and Flood Risk Assessment should be submitted.</b>
<b>Benefits</b>	"A bus stop lay-by would be constructed on the A338 frontage, and an improved pavement provided for most of the length of this frontage (including a new section of pavement to connect to Byway GRAF2)." <b>These benefits should be included in the allocation.</b>
<b>Contributions</b>	The report notes the need for contributions for infrastructure, including signage for pedestrian safety. <b>Ensure that contributions towards infrastructure (e.g., pedestrian crossing and waste collection) are clearly outlined.</b>

## Appendix 6: Parish Council Meeting Minutes

### Minutes of Grafton Parish Neighbourhood Planning Meeting held at Thatched Barn, Wilton on Monday 21 October 2024 at 19:30 hours

Item	Topic and Actions
	<p><b>Attendees:</b> Mr Richard Pash (Chair), Mr Edward Nelson together with <b>Members of the Public:</b> Mr Bill Clemence, Mrs Ellen Harris, Mr Peter Lemon</p> <p><b>Apologies for absence:</b> Mr Mike Hatherell, Mr David Lemon, Mr George Hosier, Mr Jonathan Lyle, Mrs Emma Dawney.</p>
1.	<b>Matters arising from Neighbourhood Planning Meeting held on 19 August 2024:</b> The minutes of the meeting were approved.
2.	<b>Community Consultation – Sept 20<sup>th</sup>:</b> Mr Pash explained there had a successful Community Consultation meeting on Sept 20 <sup>th</sup> with 60 people attending and positive feedback on the proposals in the Grafton neighbourhood plan. The group agreed that the meeting had gone well and all were encouraged by the number of people attending and the quality of discussion in the meeting. Mr Pash confirmed that he had spoken to all landowners who had submitted proposals, ahead of the meeting.
3.	<p><b>Next Steps.</b> Mr Pash explained the next steps in the development of the Neighbourhood Plan, in what are called “Section 14”, “Section 15” which will allow feedback from parishioners and Wiltshire Council to be taken into account, leading towards a parish referendum “Section 16” on the plans. He explained that Andrea Pellegram was retiring and that her son Nick Pellegram was now taking over the work. Mr Pash explained that he had site visit with with Nick on Oct 18<sup>th</sup> to visit the Parish, the villages and the various locations and sites involved in the Neighbourhood Plan.</p> <p><b>Action:</b> Mr Pash to bring a summary of progress at the next meeting, and to share the latest draft of the NDP document, when ready.</p>
4.	<p><b>Grant Funding – position:</b> Mr Nelson explained that grant funding had been received for Andrea Pellegram Ltd to support the Neighbourhood Plan process in FY 2024/5 for £8023.</p> <p>Mr Pash explained he had been alerted to a fund that could help fund the planned footpath improvements. It is the “Farming in a protected Landscape” scheme otherwise known as FIPL: <a href="https://www.northwessexdowns.org.uk/farming/farming-in-protected-landscapes/">https://www.northwessexdowns.org.uk/farming/farming-in-protected-landscapes/</a>. The group expressed interest and Mr Lemon provided useful guidance from his experience. Mr Pash and Mrs Harris agreed they will contact Jemima Sellwood at FIPL.</p> <p><b>Action:</b> Mr Pash and Mrs Harris to provide an update on FIPL at the next meeting.</p>
5.	<b>AOB:</b> Further meeting dates for 2024 are 16 December.

**Next Grafton Neighbourhood Planning Meeting: Monday 16<sup>th</sup> December 2024 at 19:30, Thatched Barn, Wilton**

**Contact:** [clerk@graftonparish.com](mailto:clerk@graftonparish.com)  
**website:** [www.graftonparish.com](http://www.graftonparish.com)