

Origin3 Ref. – 25-017

Development Management
Economic Development and Planning
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

13th July 2026

Dear Sir/Madam,

Request for Pre-Application Advice – Proposed Residential Development – North End Works, Ashton Keynes

This request for pre-application advice has been made by Origin3 on behalf of North South Land Ltd, relating to the proposed redevelopment of the North End Works industrial site, north of Ashton Keynes in Wiltshire.

The emerging proposals are for the residential-led redevelopment of the industrial site, comprising up to 300 dwellings (at the current stage), with the potential for a flexible employment, commercial and/or leisure floorspace, public open space, green infrastructure, ecological enhancement, drainage, access, parking, demolition, remediation, site preparation works and associated infrastructure.

North End Works is a substantial previously developed site which has historically been used for aggregate processing, concrete product manufacturing and associated industrial operations. Holcim UK (formerly Aggregate Industries UK Ltd) has confirmed that, following a rationalisation of its wider business operations, manufacturing operations have ceased. Holcim will retain a presence on site whilst delivering remaining stock to customers, before vacating the site in 2027.

The purpose of this pre-application enquiry is to seek Wiltshire Council's initial advice on the principle of a residential-led redevelopment of this previously developed industrial site. In addition, the applicant is seeking the Council's view on the application of Vacant Building Credit, and the planning route for demolition, remediation and enabling works. A separate formal request for an Environmental Impact Assessment Screening Opinion will be submitted pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

For the avoidance of doubt, this pre-application enquiry is primarily concerned with matters of principle and planning strategy, rather than detailed technical advice on individual disciplines. A forthcoming planning application would be accompanied by the necessary technical assessments, enabling all relevant technical matters to be properly considered at that stage.

The pre-application submission comprises the following documents:

- Pre-application form
- Covering Statement
- Site Location Plan
- Concept & Framework Plans
- A Proposal for Change Vision Document (June 2026)
- Holcim Statement

The appropriate pre-application advice fee of £4,351.90 will be paid for Level 6 (Large Scale Major) advice by the applicant, North South Land Ltd, calculated as 10% of the application fee based on the site area of 17.52 hectares.

Site Background, Location and Context

The Site is located to the south-west of South Cerney, east of Somerford Keynes and north of Ashton Keynes. The Site and Ashton Keynes fall within Wiltshire Council's administrative area, while South Cerney and Somerford Keynes lie within Cotswold District Council's administrative area in Gloucestershire. The administrative boundary with Cotswold District lies approximately 400m to the east / north-east of the eastern edge of the Site at its closest point.

The Site extends to approximately 17.5 hectares / 43 acres and is located to the east of Ashton Road, from which existing vehicular access is taken. The Site lies within the Cotswold Lakes, formerly known as the Cotswold Water Park, which comprises a series of former gravel and aggregate extraction pits that now accommodate a range of leisure, recreation, tourism and ecological uses.

North End Works has been in long-established industrial use associated with aggregate processing, concrete product manufacturing and sales distribution since the early 1960s. The Site has most recently been operated by Holcim UK, formerly Aggregate Industries UK Ltd. Prior to the establishment of the manufacturing-related uses, the Site formed part of a wider sand and gravel extraction area permitted in 1952. The adjoining worked areas to the east and south have since flooded and now form Lake 26, used by Whitefriars Sailing Club, and Lake 27, which is in private use.

Planning permission was granted in 1962 for the establishment of a concrete block-making business on land forming part of the present Site, including the provision of a hardstanding measuring approximately 300ft by 300ft. Since that time, a number of further permissions have been granted for industrial buildings and associated operations, including the importation of inert aggregate materials for the manufacture of building products and the relocation of aggregate processing activities from other local quarry sites. The Site has therefore evolved over a sustained period as an established industrial complex within the Cotswold Lakes area.

As detailed and illustrated in the accompanying Vision Document, the Site presently comprises a range of factory buildings, ancillary buildings, workshops, stores, office buildings, staff welfare facilities, substations, demountable structures, conveyors, batching towers, aggregate bins, silos, hoppers and external operational yard areas. The Site is predominantly hard surfaced, comprising compacted gravel, concrete and block paving.

The Site is therefore clearly previously developed land, having comprised a substantial industrial facility with extensive areas of hardstanding, buildings, structures and associated operational infrastructure.

Planning Policy Context and Principle of Development

The Adopted Development Plan for Wiltshire relevant to this pre-application enquiry comprises:

- Wiltshire Core Strategy 2006-2026, incorporating saved policies from district Local Plans/DPDs (adopted January 2015);
- Wiltshire Housing Site Allocations Plan (adopted February 2020);
- Wiltshire and Swindon Waste Core Strategy 2006 – 2026 (July 2009);
- The Wiltshire and Swindon Minerals Development Control Policies DPD (September 2009); and,
- Ashton Keynes Neighbourhood Plan 2015 - 2026 (Made, May 2017).

The Wiltshire Core Strategy provides the strategic framework for Wiltshire for the period to 2026. Given the age of the plan and the current housing land supply position, relevant policies will need to be considered in the context of national policy and the tilted balance, where engaged.

The Site is not allocated for residential development, however, the proposals are upon an extensive, previously developed industrial site, with existing buildings and hardstanding, and the proposed redevelopment would provide an opportunity to make efficient use of previously developed land, secure remediation and

environmental improvements, and deliver new housing and potentially employment floorspace following the cessation of the existing industrial use.

The Site is not identified as a safeguarded employment site within the adopted Development Plan. Accordingly, while the existing lawful industrial use and employment function of the Site may be relevant material considerations, there is no site-specific employment safeguarding designation which would preclude consideration of an alternative residential-led redevelopment.

The applicant also notes that the Wiltshire Local Plan Review has been withdrawn from examination. The adopted Development Plan therefore remains the starting point, but this is against the backdrop of the age of the Core Strategy and Wiltshire Council's current housing land supply position.

Housing Land Supply

Wiltshire Council's latest published housing land supply position identifies 2.8 years of deliverable housing land supply¹. The proposal would make a meaningful contribution towards housing delivery in Wiltshire on a substantial previously developed site. This is a significant material consideration in favour of the principle of redevelopment, subject to the resolution of site-specific technical matters.

Emerging Development Proposals

The emerging proposals comprise approximately 300 dwellings within Use Class C3, together with a complementary element of employment, commercial or care home and/or leisure floorspace, public open space, green infrastructure, access, drainage, remediation and associated works. The proposals will also explore opportunities for internal pedestrian and cycle connections, including links through the green infrastructure network, where achievable.

The accompanying Vision Document identifies the opportunity to deliver a high-quality residential-led redevelopment set within the Cotswold Lakes, supported by a landscape-led framework and a complementary element of employment, commercial or care home and/or leisure floorspace where feasible and viable. This includes the potential for a gateway use close to the site entrance, public open space overlooking Lake 26, internal pedestrian and cycle connections, enhanced green infrastructure, habitat creation, surface water management and a more positive long-term relationship with the adjoining lakeside environment.

Given the existing nature of the site, including extensive areas of hardstanding, existing buildings and associated industrial structures, the redevelopment will require the removal of existing structures and the lifting of existing concrete surfaces. It is anticipated that, where appropriate, existing concrete and hardstanding materials would be crushed and reused on site as aggregate to help form a suitable development platform.

This approach would reduce the need to export material from the Site, limit the requirement to import material, and assist in delivering a comprehensive remediation and redevelopment strategy for the Site. Further details of the proposed demolition, remediation, and development platform strategy would be provided as part of any future planning application.

Early engagement has commenced with local parish councils and identified stakeholders. This engagement will continue as the proposals progress, with wider public consultation to follow as more detailed proposals emerge. The applicant is committed to an open dialogue with local communities and stakeholders in order to explain the rationale for the redevelopment, understand local priorities, concerns and opportunities, and help inform the future of the Site. Feedback received to date has been positive in relation to the proposed redevelopment of the Site.

Designations

¹ Wiltshire Council Housing Land Supply Statement (Published: June 2026, Base date: April 2025)

The applicant recognises that the following matters will need to be considered and addressed in any future planning application:

- Ecology and the relationship with Lake 26 and the Cotswold Water Park SSSI, including layout, buffers, lighting, drainage, construction management and long-term management.
- Flood risk and surface water drainage, noting that the majority of the Site lies within Flood Zone 1, with limited areas along the eastern side shown within Flood Zone 2, and overland surface water flows which follow the Site's existing drainage system. High groundwater will also be an important consideration.
- Land quality, contamination, remediation and the approach to demolition, taking up of hardstanding and creation of a development platform.
- Landscape, visual and design matters, including the Site's relationship with Lake 26, the wider Cotswold Lakes landscape, nearby settlements and Ashton Road.
- Minerals safeguarding having regard to the Site's location within a Mineral Safeguarding Area, historic mineral extraction, subsequent industrial use and existing developed character.
- Any relevant implications of the nearby Barnground safeguarded waste site, including land-use compatibility, amenity and safeguarding matters.

Benefits of Development

Development at North End Works can deliver net gains across all three overarching NPPF sustainable development objectives.

In social terms, the proposals would deliver much-needed new homes contributing to housing delivery in Wiltshire in circumstances where the Council is unable to demonstrate a five-year supply of deliverable housing land. The delivery of housing on previously developed land should be afforded significant positive weight. The proposals would also support new residents who would help sustain services and facilities in nearby settlements, including Ashton Keynes, South Cerney, Somerford Keynes and Cirencester. The development would also provide new public open space and green infrastructure as part of a comprehensive redevelopment of the Site.

In economic terms, the development would generate construction employment and wider supply-chain benefits. The proposed employment floorspace would help retain an employment-generating use on the site, albeit in a form that is more compatible with the proposed residential-led redevelopment and the Site's sensitive lakeside context.

In environmental terms, the proposals would make use of previously developed land shortly to become vacant, consistent with the Government's objective of making effective use of land. The redevelopment would provide the opportunity to remove existing industrial structures, address remediation matters, repurpose existing areas of hardstanding, and secure a long-term use for the Site following the cessation of the existing industrial operations.

The proposals also provide an opportunity to deliver biodiversity net gain, new green infrastructure, improved drainage and surface water management, and a more appropriate long-term relationship with the adjoining lakeside environment and Cotswold Water Park SSSI.

It is acknowledged that the Site is relatively remote from larger settlements and that opportunities for travel by non-car modes are likely to be limited. Accessibility will therefore be an important matter for consideration through the pre-application process and any forthcoming planning application. This needs to be considered in

the specific context of the Site's established industrial use, however, including its substantial previously developed character, the opportunity to secure the reuse of land shortly to become vacant, and the wider benefits associated with housing delivery and environmental enhancement.

Overall, the redevelopment of North End Works provides an opportunity to secure the comprehensive reuse of a substantial previously developed industrial site, deliver much-needed housing, the potential to retain an appropriate element of employment-generating floorspace, and provide environmental improvements following the cessation of the existing industrial use.

The applicant considers that these benefits, together with the Site's previously developed character and the current housing land supply position, provide a strong basis for positively exploring the principle of residential-led redevelopment through the pre-application process.

Vacant Building Credit

Vacant building credit (VBC) is a national planning policy mechanism which seeks to support the reuse and redevelopment of brownfield land. It is provided for by paragraph 65 and footnote 30 of the NPPF, with further guidance set out in the National Planning Practice Guidance (NPPG).

Where vacant buildings are being reused or redeveloped, the NPPF provides that any affordable housing contribution due should be reduced by a proportionate amount, equivalent to the existing gross floorspace of the relevant vacant buildings. NPPG explains the circumstances in which Vacant Building Credit may apply, including where a vacant building is demolished and replaced by new buildings.

Wiltshire Council has no published guidance relating to the application of VBC and the starting point is therefore paragraph 65 and footnote 30 of the NPPF, and the NPPG. Whether a building has been 'abandoned' is a question of fact and degree having regard to certain factors. It will be demonstrated as part of a future planning application that the existing buildings on site have not been abandoned, and have formed part of the lawful industrial use of North End Works which has come to a natural closure.

The vacancy of the buildings would arise as a consequence of Holcim's operational decision to cease its use of the Site, rather than as a result of the buildings being abandoned. It is also relevant that the Site is not subject to an extant or recently expired planning permission for the same or substantially the same development, i.e. residential development. On that basis, the applicant considers that Vacant Building Credit is likely to be relevant to the calculation of affordable housing provision for any future planning application.

We would welcome the Council's initial advice on the information it would expect to be submitted to support the application of Vacant Building Credit, including the approach to measuring existing gross floorspace, demonstrating the lawful use and vacancy status of the buildings, and applying the credit to the affordable housing calculation.

Remediation, Demolition and Enabling Works

Given the Site's existing industrial character, any future redevelopment will require the demolition of existing buildings and structures, removal of plant and equipment, breaking up of areas of hardstanding, land remediation, and the creation of a suitable development platform.

At this stage, the applicant is considering the appropriate planning route for these works, including whether any elements may fall outside the definition of development, benefit from permitted development rights, require prior approval, or require express planning permission. This will need to be considered having regard to the Town and Country Planning Act 1990, the General Permitted Development Order and the Environmental Impact Assessment Regulations.

The applicant recognises that permitted development rights may be restricted where development is EIA development, and that demolition and site preparation works may need to be considered carefully in the context of any wider redevelopment proposal. The applicant would therefore welcome the Council's advice on the likelihood of planning permission for any demolition, remediation and enabling works, including whether such works should be incorporated within a future planning application.

Environmental Impact Assessment Screening

The applicant recognises that the emerging proposals fall to be considered against Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, having regard to the scale of the Site and the proposed number of dwellings.

A separate formal request for a Screening Opinion will be submitted to Wiltshire Council pursuant to Regulation 6 of the EIA Regulations. That request will be accompanied by a site location plan and a screening assessment addressing the relevant Schedule 3 selection criteria, including the characteristics of the development, the environmental sensitivity of the Site and surrounding area, and the likely nature and significance of any environmental effects.

At this stage, the applicant's preliminary view is that the redevelopment is capable of being brought forward without likely significant environmental effects, subject to appropriate technical assessment, mitigation and construction management. However, the applicant recognises that the Site's industrial history, the proposed demolition/remediation works, and proximity to the Cotswold Water Park SSSI are matters which require careful consideration through the formal screening process.

Pre-Application Advice Requested

The applicant would welcome the opportunity to discuss the emerging proposals with Wiltshire Council and is primarily seeking advice on the principle of residential-led redevelopment of the Site, having regard to its previously developed character, the cessation of the existing industrial operations and the current housing land supply position.

In particular, the applicant would welcome the Council's advice on:

1. The principle of residential-led redevelopment of the Site.
2. The proposed scale and mix of uses, including the potential for complementary employment, commercial, care home and/or leisure floorspace, and the Council's views on the suitability of, and any preference between, these potential non-residential uses.
3. The scope of technical work likely to be required to support a future planning application.
4. The application of Vacant Building Credit and the supporting information the Council would expect to see in order to apply VBC.
5. The appropriate planning route for demolition, remediation and enabling works.
6. The Council's initial views on the likely approach to EIA, noting that a separate formal Regulation 6 Screening Request will be submitted.
7. Any key planning, environmental or infrastructure matters which the Council considers should be addressed as part of the submission of a planning application.
8. Validation requirements for an outline planning application for the works described above.

Description of Development

The applicant would also welcome the Council's initial advice on the appropriate description of development for any future planning application, having regard to the residential-led nature of the proposals, the potential complementary employment, commercial or care home and/or leisure floorspace, and the need for demolition, remediation, site preparation and enabling works (and the requirement for formal consent for some or all of these works).

Based on the emerging proposals, the applicant anticipates that any future application is likely to be submitted in outline, with all matters reserved except for access. An initial working description may be as follows:

Outline planning application, with all matters reserved except for access, for the residential-led redevelopment of North End Works to provide up to 300 dwellings, together with flexible employment, commercial / care home and/or leisure floorspace, public open space, green infrastructure, ecological enhancement, drainage and sustainable drainage infrastructure, vehicular and pedestrian access, internal roads, parking, landscaping, demolition of existing buildings and structures, remediation, site preparation works, formation of development platforms and associated infrastructure and works.

The applicant would welcome the Council's advice on whether this description appropriately captures the likely scope of the application, or whether any elements should be added, removed or described differently.

I would be grateful if you could confirm receipt of this pre-application submission and we look forward to hearing from you shortly with regards to arranging a meeting date.

In the meantime, if you have any queries regarding the above, please do not hesitate to contact me.

Yours faithfully



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