

Rep ID: Warm001	
Consultee code: General Public	Consultee Organisation (if applicable): resident
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>I am pleased with the scale of growth proposed for Warminster which should allow it to thrive both economically, socially and ecologically. It is a huge relief to me to see that the mass identification of further green field sites is not necessary. I consider that the development of Brownfield sites to be of paramount importance as these sites, developed well, ensure that town centres remain vibrant, that public transport services are more likely to be used and our greenspaces remain just that. The development of brownfield sites also allows us to have good links with our past using historic development patterns of towns alongside improving the general 'streetscene' of the town. It is difficult to see how a brownfield target may be set as surely a key aspiration is to not have any derelict or underused town sites?</p>	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	

I believe that the key to retaining Warminster's town centre as a vibrant place is to retain parking within the town - it must be almost unique in that you can not only park and do your large weekly shops in town centre supermarkets (Waitrose, Morrisons and Lidl) but from the same base you can also visit larger outlets like Argos and B and M alongside using small local shops like the butcher or the friday market stalls. It is vital to retain this and accordingly it is vital to not only retain good parking provision in the town (which it currently has) but not to create those 'out of town developments' where people have to drive to (i.e. Trowbridge retail parks etc). We haven't got an out of town retail park and I'm pretty sure we don't want one! It is also vital to keep our retail 'tight' to the housing to encourage people to walk in wherever possible.

Warminster has a unique geography and history which will hopefully dictate the size and scale of the town moving forwards. Owing to the presence of Salisbury Plain and the lack of public access to the north of the town and the lack of public roads to the south (Smallbrook area), not to mention the prominent by-pass, the town cannot grow in every direction. It has significant ancient monuments on many sides (Battlesbury, Scratchbury, Arn Down and Cop Heap to name a few) and a good number of nature reserves in the forms of Smallbrook Meadows, Arn Hill and Cop Heap. No-one has to walk very far to get to the countryside and I am eager to see this preserved.

Warminster needs more cycle routes offering alternative safe routes and more bridleways and footpaths offering access to the countryside. It is a constant failing of our countryside that people drive to get there. It is a nonsense that people load dogs into cars daily to walk them and a nonsense that people load cycles onto car racks to drive somewhere to use them. Integrating our transport system is key to making people leave the car at home.

WA3. Is this the right pool of potential development sites?

Land at The Dene may have already been the subject of an inspector's report but that should not mean it does not get a fair evaluation now - other sites may be even less suited to development but not have the benefit of an inspector's report. The land identified at 1 - North Warminster (2069, 2070 and 2071) is among the least suitable sites (though the land on Imber Road is the better of the 3 parcels) - although Imber Road is a public road, it is a cul-de-sac ending at the range boundary, likewise Elm Hill is a narrow rural road that is also a cul-de-sac ending at the range boundary. the junction of Elm Hill, Copheap lane and the Portway is frequently congested and difficult, it is not a suitable area of town to introduce more traffic too. the link between Elm Hill and Imber Road is not even a continuous public footpath let alone a public road. Additionally Elm Hill provides recreational resources for countless people and has good public rights of way links to as much of the downs as the MOD permits us to get

through. Development on this side of the town is remote from the town, involves significant hills and restricted transport links. The mix of woodland and open fields (and nearby SSSI and chalk grassland) provides an important habitat for wildlife, especially owls and other birds of prey. Likewise the land identified at 9 - Land at New Farm - encroaches unnecessarily into Warminster's green spaces with the land to the north of Westbury Road being the least suitable - the land is flanked by significant woodland, much managed as a reserve, and the open fields provide valuable hunting ground for the birds living in the woods. It is also visible from the town and would very much spoil the outlook of the rising chalk slope if the bottom of it suffered creeping development. Land to the south of Westbury road (also parcel 9) is better suited to development insofar as it links well with Westbury Road but it drains poorly, is a long walk to town and lacks connectivity owing to the railway line. We really do need to limit habitat loss and areas to the north of town on the chalk are especially valued by people.

WA4. What land do you think is the most appropriate upon which to build?

Other than an intelligent use of all brownfield sites, sites 2, 3, 4 and 5 make the most sense for transport links and for keeping the town 'tight' to existing development. They appear to have the lowest impact on the environment. Parts of 9 may have potential but there are significant problems with links across the railway and drainage.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

We have to look to making Wiltshire carbon neutral and we have to improve the way we get around - we need people to live at sites where they are likely to walk or cycle to work, to the doctors or dentists or to the shops or to entertainment venues and this means keeping developments close to the town on flat sites. In addition we have to stop destroying established wildlife habitat. Planning obligations to provide more habitat than they destroy are a hopeless sop - when you take a hedge out you destroy everything that lives there - not just the hedge. Estates these days are a maze of close boarded fences and small gardens with little in the way of habitat for anything other than us - we really can't afford to lose any more and need to value the greenspaces that we have.

WA6. Are there any issues or infrastructure requirements that should be identified?

No, though re-iterate the importance of planning for integrated transport.

Further comments

No

Rep ID: Warm002	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
Brownfield areas should be the NO1 development targets and NOW following the pandemic town centres need to be completely re thought with housing, small shop options looked at the create life and vibrancy in town centres which creates a more artisan village atmosphere in the town centre. This review CANNOT address yet the impact of COVID and as such needs much more thought and imagination	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
All good things but please apply some imagination to the developments. Infrastructure is currently at full stretch - no develop should take place until infra structure is in place. I am also very concerned about the highways and roads and impacts on	

surrounding villages. Noisy speeding vehicles are a constant blight on village communities and very little is done (because there is no money) to offer proper thought out solutions to these problems.

WA3. Is this the right pool of potential development sites?

Only develop new green field sites when the town centre and brown field sites ave been redeveloped.

WA4. What land do you think is the most appropriate upon which to build?

Re use peaty abandoned shops and premises littered through the town

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

more green space (not used for housing) more trees in the town. Better control of speed and noise of vehicles and all surrounding A roads. Address the appalling littering on the A36 and bypass route - building more houses will make this worse WC can't keep on top of it now

WA6. Are there any issues or infrastructure requirements that should be identified?

Green space and greening of communities

Further comments

I think the timing of the review needs to be re thought in the light on the pandemic. There have been profound changes in the retail environment, and the town needs to thrive to attract people jobs and money. Only when the council has addressed the town centre should it move onto sprawling development elsewhere. The premises next the St lawrence church are a testament to how poorly the town has handled regeneration. For whatever reason that is the case, other buildings in the town cannot slip into disuse, disrepair and failure.

Rep ID: Warm003

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Chapmanslade Parish Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WA1. What do you think to the scale of growth? Should there be a brownfield target?

The scale of growth is very large and concentrated at the west end of Warminster. Care should be taken in design and layout to ensure residents of these developments have suitable access using sustainable transport and active travel not only to the town centre and facilities but also to neighbouring settlements. Although the requirement for additional housing is small it would be useful to set a brownfield target and to minimise the use of greenfield land for development.

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

We mainly agree with these priorities but would ask for less emphasis in priority 3 on parking and more emphasis overall on active travel and cycling.

WA3. Is this the right pool of potential development sites?

The potential development sites offer a wide range of options for the future.

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Site 9 contains important GBI and is also strategically positioned to carry off road active travel routes to both Frome and Westbury via Upton Scudamore and Chapmanslade. These routes could form extended GBI. Consideration should be given to bridging the railway line at the south of this site for active travel access to Crusader Park and beyond in order to reduce the use of carbon emitting vehicles.

WA6. Are there any issues or infrastructure requirements that should be identified?

Education – There is a requirement for adult and further education that needs to be based in Warminster so that the settlement is more self-sufficient reducing the need to travel.

Transport – Warminster has very few off highway cycle multiuser paths and has poor connections for cycling to neighbouring villages and towns. These must be a priority to enable active travel choices as well as improved public transport options.

Further comments

Our overall view is that housing planning cannot be disconnected from schemes to reduce climate change. In Chapmanslade's case considerations must be made to how much traffic will increase with increased building, especially to the west of Warminster. A fundamental update of the Town and Planning Act is required to make Climate Action Plans etc. workable by making climate impact a key factor of every planning application. Additionally, future and existing sites need a new infrastructure of connections that encourage active and sustainable transport such as cycling and walking, with vehicular traffic being increasingly reduced in access to routes that pass through residential areas.

Rep ID: Warm004	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Sport England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
No Comment	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Creation of a healthy, inclusive sustainable town. this can be done in part through the use of 'Sport England and Public Health England' Active Design: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design when designing new housing and in environmental improvements	

WA3. Is this the right pool of potential development sites?

No: Sport England would have a statutory objection to sites 1 and 2. there would be loss of playing field. We would expect replacement prior to development but NOT on flood plains and should be in a suitable accessible area. This is in line with the NPPF paragraph 97.

We would be concerned about sites in the proximity of cricket sites in relation to new housing due to possible ball strike.

WA4. What land do you think is the most appropriate upon which to build?

Non-sporting land

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

See above

WA6. Are there any issues or infrastructure requirements that should be identified?

No

Further comments

No

Rep ID: Warm005	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
Lower, all development should be on brownfield sites	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Reduction in car usage in and around town, the streets are narrow, currently roads into the Car Park can not cope with an increase in capacity. More should be done to prioritise cycling and walking around the town and provide safe infrastructure for cyclists & walkers. Copheap Lane is like a race track at some times, making crossing difficult.	

WA3. Is this the right pool of potential development sites?

Sites 2, 8, 4

WA4. What land do you think is the most appropriate upon which to build?

Brownfield sites

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Site 1 lacks decent infrastructure to access, the location both Imber Road & Elm Hill are not suitable for an increase in traffic transiting through.

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm006	
Consultee code: General Public	Consultee Organisation (if applicable): N/A
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
I think the figure should be lower. There are already problems in the town with NHS access (you have to wait for more than a month for an appointment at the surgery, and for 6 months for an appointment at the NHS dentist), traffic problems (traffic jams in town centre), air pollution, and sewage overload.	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Number one priority should be environmental protection. Protect our green spaces and wildlife. Reduce the carbon footprint of Warminster. Both Wiltshire Council and Warminster Town Council have declared climate emergency. The list above doesn't reflect that.	

WA3. Is this the right pool of potential development sites?

I object to you building on any of the sites mentioned.

WA4. What land do you think is the most appropriate upon which to build?

None.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Yes, environmental factors. Stop building new houses, retrofit the existing houses, protect green spaces and wildlife.

WA6. Are there any issues or infrastructure requirements that should be identified?

The environment.

Further comments

I object to you building on site 3242. It is a beautiful green field with trees and wildlife. Lots of people use it for walking and dog-walking (it's a public amenity). There is no proper access to the site for traffic.

Rep ID: Warm007	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
Yes and it should not exceed the original suggestion of 60 homes and no greenfield sites should be considered.	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
WE definitely need to expand the GP surgery. No building should take place in areas of potential flooding, as this impacts on the local environment we are so lucky to have Smallbrook meadows and the park. Tree planting should also be considered in and around all potential development.	

WA3. Is this the right pool of potential development sites?

Possibly not sure

WA4. What land do you think is the most appropriate upon which to build?

No easy answer, but trying to ensure that not all the internal areas of green are built on.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

It is important that there are reasons for people to want to visit the town centre, trying to help and support small, local businesses, cafes and bars. Allowing a reasonable amount of these to have space for outside seating. Ensuring that parking costs are not prohibitive to encouraging the public to visit the town and working in town.

WA6. Are there any issues or infrastructure requirements that should be identified?

No

Further comments

Rep ID: Warm008	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
WA3. Is this the right pool of potential development sites?	
Grounds of objecting to development on Plot 5: 1. The development contravenes local development plans and policies. The land is outside the settlement boundary.	

2. Local people oppose the development by an overwhelming majority: less than 4% of the developers' respondents approved of it. Local and democratic opinion should prevail. I believe the local MP also opposes the development.
3. There is plenty of development land and potential already in Warminster; the fact developers are sitting on it should not permit the developers here to take over a greenfield site.
4. There is no need for further development of this sort in Warminster. Developing Warminster is not going to help the County's housing need when there are very limited employment opportunities here unless Warminster is envisaged to be just a commuter town, contrary to what the developers say.
5. The flooding issue is well-documented by recent pictures; the flood risk assessment is simply wrong, as neighbours whose gardens flood will attest. Any proposal to drain the site into nearby water-courses will not work as the existing water courses are insufficient, as is also well-documented. The knock-on effect on existing homes hasn't been assessed and is likely to make current flooding in them worse.
6. The site will suffer subsidence; the houses proposed will have too great a mass to be supported by the land. The resulting houses will be unstable, uninsurable, unmortgageable and uninhabitable. The development would become a no-go area.
7. Proposed road access is inadequate and will pose dangers to other traffic and pedestrians, including school children. The snicket known as "Dorothy Walk" would likely become a second road access point. Dorothy Walk is not even suitable as an emergency access, as the developers propose, as it is pedestrianized, narrow, and bounded by trees.
8. The development is wholly out-of-keeping with the area. The Minister has Saxon origins; other nearby buildings have a historic character or else are well-hidden individual dwellings, unlike the proposed development. The development would also destroy well-acknowledged highly-important actual and potential archeology going back to Saxon times, or earlier.
9. The development would destroy wildlife habitats for flora and fauna. There are protected and priority species on the site which, of course, would be terminated as the built environment will engulf their habitats. The proposals are unclear which trees would be felled across Dorothy Walk in order to accommodate either the road across it or the widened emergency access road (a fire engine couldn't get through the trees as they currently stand).
10. Dorothy Walk doesn't belong to the developers; they have no right to develop it, put a road over it, or cut down its trees. Dorothy Walk, and the wider development site, is a local amenity for walking and pleasure enjoyed by many local people and is part of the conservation area intended to provide a conserved, un-built environment. The development proposed would destroy it and would upset the necessary balance between the urban and the rural.

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

As a general matter, there should be no new building in Warminster. What is currently planned to the west of town is excessive. That development, and any new developments, are not supportable by local jobs nor the transport infrastructure that will be needed to permit commuting. It will not benefit the town as it is too far away; people will shop where they work, in the larger conurbations they will commute to. All this is being done in an area recently subject to flood warnings; for much of the winter large areas of this land have been constantly under standing water. It will increase the flood risk to the remainder of the town. As regards the nine proposed areas for potential development, those numbered 5, 6, 7, 8 and 9 are already in the region of the planned huge development to the west of town and should be avoided. They are all prone to flooding and will further increase the flooding risk for the rest of town. One area deserves special mention - Number 5 on the plan, known locally as 'Dorothy Walk'. This was subject to a planning application recently (13/05089/FUL) which was fiercely resisted by residents and turned down. I set out below some of the grounds for resisting any development on that land. Finally, there is a large amount of residential property in Warminster which is unused. Whilst it is principally over shops it would accommodate many if not all of the people sought to be housed in the additional 60 new homes envisaged. The Council should concentrate on getting that accommodation back into use.

Rep ID: Warm009	
Consultee code: Other	Consultee Organisation (if applicable): Boon Brown
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
.A presumption in favour of brownfield with a built in understanding of abnormal costs of development.	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Yes	
WA3. Is this the right pool of potential development sites?	

Yes

WA4. What land do you think is the most appropriate upon which to build?

Land in the north western sector of the town west of Westbury Road and South of the A350.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

No

WA6. Are there any issues or infrastructure requirements that should be identified?

Personal electric vehicle dedicated pathways similar to cycle paths.

Further comments

We are in support of the allocation of land at 44 and 48 Bath Road, SHELAA Ref. 1030, LPR Ref Site 7. Careful control of the development of the site via Local Plan allocation or planning application would allow for controlled landscaping techniques to form a robust and attractive northern boundary to this sector of the town. Development of the site would tie in well with the built development northern line formed by Crusader Park employment center.

The site is served by a pavement into the town however, it is envisaged that the site will benefit further in sustainability terms from its proximity to Core Strategy allocated site CP2 (West Warminster Extension) directly to the south-west.

Rep ID: Warm010

Consultee code: Statutory Body

Consultee Organisation (if applicable): Wessex Water

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WA1. What do you think to the scale of growth? Should there be a brownfield target?

Where developing on brownfield sites opportunities must be realised to redirect surface water from the foul water networks and limit the surface water flows from site using multi benefit SuDS schemes.

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

In view of the Wiltshire Council's comments made under "Scale of Growth" for Warminster and in view of the timescales available for comment we will engage further on potential development in Warminster when pertinent to do so.

WA4. What land do you think is the most appropriate upon which to build?

Please see response under WA3.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Please see response under WA3.

WA6. Are there any issues or infrastructure requirements that should be identified?

Please see response under WA3.

Further comments

Rep ID: Warm011	
Consultee code: Other	Consultee Organisation (if applicable): Woodland Trust
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
WA3. Is this the right pool of potential development sites?	

We highlight that Site 8 is adjacent to ancient woodland (Norridge Wood PAWS (Grid reference: ST85954587)), which is defined as irreplaceable by the NPPF and is afforded special protection from development (NPPF para 175c).

An appropriate buffer is needed between any ancient woodland site and any new development to ensure that the development does not adversely impact, directly or indirectly, the ancient woodland (which would be in contravention of the NPPF). We urge that the site allocation boundary is reduced to incorporate this buffer at this stage of the plan process, to ensure the need for an adequate buffer is not compromised later. As a precautionary principle, a minimum 50m buffer should be maintained between a development and the ancient woodland, including through the construction phase.

We note that Norridge Wood is a PAWS - a Plantation on Ancient Woodland Site - which is equally protected under NPPF para 175c. This remains irreplaceable habitat due to the rich soils that have developed over hundreds of years of continuous woodland cover and which, through careful management, can be restored to healthy ancient woodland.

Our Planner's Manual for Ancient Woodland and Veteran Trees

(<https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/>) provides more information.

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm012	
Consultee code: General Public	Consultee Organisation (if applicable): Resident
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
The brownfield target should be as high as possible. The focus on farmland should be as minimal as possible.	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
How do these fit in with the need to address climate change and achieve carbon reduction? There needs to be a clear focus on the easy access to multiple outside spaces for families and particularly children, given the clear evidence on the benefits to mental health, not just a twee tame park in the centre of town. These spaces need to be where families can access natural habitats in various places.	

WA3. Is this the right pool of potential development sites?

The area planned alongside the A36 is already a travesty and will be detrimental to wildlife populations with such high density of houses. Why are you considering building on a County wildlife site (area 1), this should not be considered. Why are you considering building on flood zones (area 9 and area 2), this should not be considered.

WA4. What land do you think is the most appropriate upon which to build?

Brownfield sites. Land that is NOT in a flood zone. Smaller pockets of land that can create communities and not great swathes of farmland removing the rural feel of the town.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

How does low cost housing fit into this? Not building on flood zones. Creating easy access to open and green spaces for every development, which will become a haven to residents, benefitting their mental health. Recreation (not formal) away from the town centre. What will the environmental impact of these houses be on the area? How is the governments targets in relation to reducing climate change built into the plans? How does this fit into the sustainability and transformation plan for the regional & local health economy? Access for the increasing number of elderly in the population.

WA6. Are there any issues or infrastructure requirements that should be identified?

Clear and sustainable plans for safe walking and cycling routes around and through the town and vicinity. Incorporating the need to improve the populations wellbeing and mental health, so not just looking at formal sport and leisure facilities, but at other areas

and activities that improve wellbeing and mental health, such as easy access to open and green spaces amongst wildlife. Stop trying to corral everyone into the town park, which has limited appeal to those who aren't very young or very old. Safeguarding the environment more widely, to reduce carbon emissions and actively act to reduce climate change and the effects of climate change.

Further comments

The vast expanse of housing planned next to the A36 is horrendous!
How can the council guarantee the longevity in a good state of repair of the housing stock planned?

Rep ID: Warm013	
Consultee code: Landowner	Consultee Organisation (if applicable): Context Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM13
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>4.1 Warminster has itself been a victim of a narrow base of sites to meet housing demand. Compound delays to the WWUE are directly attributable to the chronic under-delivery outlined. The Council risks making the same mistake again if the base of supply is not widened through the Local Plan Review process. Supply has been choked off because 'all the eggs were placed in one basket'.</p> <p>4.2 Whilst an outline planning approval has been granted for the main part of the WWUE this took 5 years to be approved. The phased delivery of reserved matters submissions will not be a quick process. The suggestion within the 'Planning for Warminster' document that 900 homes will be delivered by 2026 appears unachievable and is not corroborated by the 2019 Housing Land Supply Statement which indicates forecast supply to be 470 dwellings during this period.</p>	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

WA3. Is this the right pool of potential development sites?

7. THE ALTERNATIVE SITES

Site 1- North Warminster, land north of Elm Hill and land south of Elm Hill

7.1 The site selection report for Warminster acknowledges that this site is poorly related to Warminster. The landscape is referenced to be highly sensitive particularly given the hillslope location of the site. A development of the size being promoted would be inappropriate at a site which does not bound the settlement of Warminster.

7.2 The 'Planning for Warminster' document records that a primary school is required for the development to go forward. A primary school typically requires a development of around 800 dwellings to fund and sustain. The site whilst large is not of adequate size to include development of a school. Development on the scale proposed for this site would significantly exceed the ESS. This site should be discounted in stage 3 (the next phase) of the assessment.

Site 2 – Land north of Woodcock Road, land south of the Railway Line and Land east of the Dene

7.3 This site was removed as a potential allocation at the time of the WHSAP. The Inspector in his report noted that 'there is likely therefore to be a significant cumulative impact on the setting of both designated and undesignated heritage assets in the area...serious doubts remain over whether a form of development would be possible that would not have an unacceptable degree of impact on the character, appearance or significance of heritage assets. This would be contrary to the requirements of the NPPF'.

7.4 He went on 'notwithstanding the need for housing, I am not convinced that the benefit of development would outweigh potential harm in this location. The allocation of the site is therefore unjustified and contrary to national policy and it should be removed'.

7.5 The merits of an outline planning application for the site were tested at the same time and it was withdrawn to avoid a refusal. As well as serious concerns about the impact on designated and non-designated heritage assets there were substantial objections from the landscape officer and the highways team.

7.6 Given the planning history of this site it should not have reached this stage of the process. It should be removed at this stage from consideration.

Site 3 – Land adjacent to Fanshaw Way

7.7 This is a green field site which relates very poorly to the settlement. It only adjoins the settlement on its north eastern boundary. If developed it would appear as an oddly detached intrusion of residential development into the countryside. The landscape setting of Warminster at this point is extremely important and this development would cause significant landscape harm.

7.8 Planning permission has previously been refused for residential development of this site which included the land to its west. The development would need to be accessed from a modest residential cul-de-sac. It would not be suitable for a significant development and it cannot be altered to be made more suitable. This site should also be discounted on highways grounds.

7.9 The site is identified as being vulnerable to ground water flooding which should lead to it being discounted given there are sequentially more preferable sites from a flooding perspective.

Site 4 – Land at Warminster Common and land south of Wren Close

7.10 This site only borders the settlement boundary on its northern edge. With agricultural fields to its west and east, development would protrude significantly from the existing built form of the settlement and unacceptably harm landscape character. Planning permission was previously refused on two occasions for a large residential development of these fields.

7.11 The Council's analysis recognises the site is unfavoured having regard to its likely impact on traffic. It is more ecologically sensitive than other options and there is inadequate evidence regarding whether a development could be designed to suitably mitigate for impact on bats and dormice. For these reasons this site should be discounted.

Site 5 – Land at Church Street

7.12 Significant portions of this site are located in flood zone 2 as well as being vulnerable to both fluvial and groundwater flooding. As such it would clearly not be a sequentially preferable site to develop when alternative sites such as Site 8 are located outside of the flood zone and can reasonably be developed without increasing flood risk on or off site.

7.13 The site performs an important role as part of the setting of the Grade II* Parish Church of St Denys and the Warminster conservation area. A planning application was refused permission in 2013 with 9 separate reasons for refusal for a proposal of 60 dwellings on the site. Several of the reasons were not matters of detail but in principle objection to the prospect of a residential development of the site.

7.14 It is very clear that given the position adopted by the Council previously in respect of a planning application, and the heritage and flooding constraints in particular, this site should be discounted at this stage.

Site 6 – Land adjacent 89 Bath Road, Warminster

7.15 This site forms part of the housing land supply of gypsy and traveller pitches for the HMA. It is required to deliver 4 pitches in line with the permission granted in 2015 (as outlined in the 2018 Five Year Supply Statement for Gypsy and Traveller Sites - August 2019).

7.16 The Council are reliant on this site coming forward for this purpose to avoid a shortfall in the supply of gypsy and traveller sites becoming apparent. The opportunity cost of developing for residential housing would be too great in this instance given the challenges faced to deliver gypsy and traveller pitches within the county.

7.17 The site is in any event a small site which would only be suitable for a minor residential development. As such it would fail to provide an element of affordable housing which is required as part of the overall housing mix to ensure that the objectively assessed need of the HMA is met. The site should be discounted on the basis of these factors.

Site 7 – 44 and 48 Bath Road

7.18 This site is opposite Site 8, adjoining the Crusader/Warminster business park. The 'B Class' type uses directly to the east of the proposed site might have the potential to create nuisance were this site to be taken forward. The existing access would require significant improvement on land which appears to be outside of the parcel to provide the necessary splays.

7.19 This side of the Bath Road has a more commercial character and this is likely to be perpetuated if the industrial estates are expanded as envisaged in the Neighbourhood Plan. A residential development in this location would appear incongruous having regard to surrounding land uses. This site would be better suited to an employment allocation were it to be developed.

7.20 Planning permission was refused in 2018 for 3 reasons to develop the site for a total of 6 dwellings. The application failed to provide a noise impact assessment and was considered to be potentially prejudicial to the amenities of future occupants given the site's relationship to the industrial estate. Development of the site was considered to contravene landscape and ecology protection policies. Development of the scale envisaged would also not provide for affordable housing. For these reasons this site should be discounted.

Site 9 – Land at New Farm, Warminster

7.21 This site is physically removed from Warminster. Only a small portion of the site would adjoin the built form of the town. This site would greatly extend the form of Warminster harming its distinctive and contained layout. It would be the most damaging of the presented options in terms of landscape impact. The Council's assessment describes the area where this development would attach to the settlement as a sensitive rural edge.

7.22 Development on the scale proposed for this site would significantly exceed that envisaged in the ESS and is clearly sequentially less favourable than other development sites like Site 8. This site should be discounted in stage 3 of the assessment.

WA4. What land do you think is the most appropriate upon which to build?

THE PROPOSAL SITE

5.1 My Client's land known as Site 2091 'Land between Bath Road and the A36 is shown in the below (Fig 4) and (Fig 5). [see attachment WARM13 for figures and mapping]

5.2 The land holding incorporates approximately 4ha of developable land when taking into account the need to safeguard existing trees. The existing western boundary would be proposed for further tree planting in the form of a belt of a minimum of 10m in width which would be likely to reduce the developable area by a further 0.2ha. WC would require on site open space provision and it is proposed to at least meet the minimum level required.

5.3 Warminster has adequate levels of employment space being planned for when taking into account the WWUE will provide 6ha and the balance is to be provided through smaller allocations. The land to the north east of my Client's site is also put forward through the NP for allocation in future for employment needs. The shortfall in development within Warminster has been shown to be in housing numbers rather than employment space. It is considered that my Client's land could be expected to contribute up to 130 dwellings towards the unmet housing requirement of which 30% would be affordable dwellings.

5.4 The land between Bath Road and the A36 could be amalgamated with the land parcel which direct adjoins it to the north (OM005) (see Fig 6). Both landowners are clients of Context Planning Ltd and they are able to commit to work together to bring forward the sites as one development. Given that the Council's consultation expresses a preference for these sites to be amalgamated the following sections of this representation consider the merits of the combined site (see Fig 7) [see attachment WARM13 for figures and mapping] which is known by the Council as Site 8. Site (OM005) is approximately 3.5Ha in size and has been previously promoted as being capable of delivering up to 110 dwellings.

Accessibility

6.1 The Council's provisional assessment outlined within the Site Selection Report for Warminster scores the site as 'amber' for accessibility. The basis for this grading is the distance the site sits from the centre and the effect this will have on accessibility of those services and facilities. However, the site is not categorised as having an unacceptable level of accessibility.

6.2 In respect of accessibility it is important to recognise that the WWUE will both greatly increase the level of services and facilities close to Site 8 whilst also delivering much improved connections to the centre of Warminster.

6.3 There is a specific requirement outlined within the WCS CP31 for the WWUE to provide a new bus service to the town centre. WC's Infrastructure Delivery Plan makes clear that the bus service should be a 30 min frequency (on weekday daytimes) connecting the WWUE and the town centre and that this will be delivered early on in the development. There will also be a bus service provided for school children to get to Kingsdown School which is on the eastern side of Warminster town centre.

6.4 The below (Fig 8) [see attachment WARM13 for map] is an extract from the travel plan which supports the approved outline application which shows a new bus route with a 30 min frequency to be delivered servicing the roundabout access from Bath Road. The provision of the bus service is a requirement of the WWUE. The allocation of Site 8 will increase patronage of the new bus service making it a more sustainable long-term service. In light of these points it can reasonably therefore be taken into

account in considering the suitability of my client's land. This point notwithstanding my client's land performs comparatively well to other candidate Warminster sites.

6.5 Site 8 benefits from excellent connections to both the A350 and A36 and would reduce the level of cross-town traffic which is an acknowledged problem within Warminster. my client's land benefits from its close proximity to the Warminster Services which is less than 300m from Site 8. The Warminster services provides a Travelodge hotel. Several restaurants including Little Chef, Burger King and Subway. It also has a BP garage and shop which provide for daily shopping requirements.

6.6 The WWUE will soon provide for a local centre with use classes A1-A5, D1 (now largely Class E) community facilities and a new one and a half form primary school. There is a public footpath which connects the lane off Bath Road directly into the WWUE so it will be possible in the future for pedestrians and cyclists to access the local centre of the WWUE directly without needing to walk alongside the Bath Road and back into the development.

6.7 Site 8's has excellent access to employment opportunities. The Crusader Business Park and Warminster Business Park are located within walking distance of the site and are major employment sites within Warminster. The WWUE also proposes an area of employment comprising some 6 hectares at the northern tip of the allocation. Given also the proximity to the A36 and A350 the site is well located for local employment opportunities with excellent communications links.

6.8 The Warminster Neighbourhood Plan (NP) is a made plan and therefore forms part of the Development Plan. Fig 9 is an extract from the NP which shows the land to the east of my client's land has also been identified as a new/potential employment site. This is significant for two reasons firstly it shows that further employment is proposed within walking distance of my client's site thereby further enhancing its sustainability credentials and secondly the principle of development to the north of the existing settlement area has been considered to be acceptable in principle and the settlement will be expanded in this direction.

6.9 Access can be gained from the site onto the Bath Road. There is an existing access junction onto Bath Road which offers good visibility splays in both directions. The access would be capable of dealing with an increase in traffic.

Fig 9 – Neighbourhood Plan spatial expression of development strategy [see attachment WARM13 for map]

6.10 The WWUE would come forward in advance of Site 8 in terms of its delivery, with it benefitting from an existing outline planning permission and reserved matters in the process of being prepared for the portion of the allocation. The Council itself predicts that 900 homes will be delivered by 2026. Site 8 would likely be brought forward in a similar manner with an outline application to be followed with reserved matters submissions. Implementation of an allocation would be unlikely to occur before the northern tip of the WWUE is built out, particularly because there is a commitment in the draft phasing for the employment land at the northern tip of the WWUE to be delivered early in the programme.

6.11 The 'amber' score for accessibility is, it is respectfully put, an unreasonable position to adopt. At the point at which Site 8 would be built out, it would have excellent accessibility to all necessary services, facilities and job opportunities on foot but also a highly regular connection by bus to the centre of the town itself. For the above reasons a 'green' score would be more appropriate.

Heritage and Flood Risk

6.12 Site 8 has been scored 'green' for flood risk and the land is situated exclusively in flood zone 1 (Fig 10) [see attachment WARM13 for map]. As such it passes the first step of the exclusionary criteria adopted by the Council. There are likewise no local flooding issue designations for the site and no history of drainage problems experienced at the land. There are no barriers to developing the site in this regard.

6.13 Site 8 has been scored 'green' in respect of its likely impact on heritage assets. The below (Fig 11) [see attachment WARM13 for map] illustrates that the land is situated approximately 800m from the conservation area boundary and St Denys Church (the closest listed building). The site can be developed without affecting these heritage assets.

Landscape

6.14 Site 8 falls within the Cley Hill greensand and chalk terrace (G4) character area in the Wiltshire Landscape Character Assessment (2007) (WLCA). The most significant landscape feature within this area is Cley Hill, a chalk knoll hillfort which provides extensive views over surrounding areas. More generally the landscape character area comprises flat to gently undulating farmland. The field pattern consists of mostly medium sized, generally regular fields, often enclosed by mainly intact hedgerows with hedgerow trees.

6.15 The feature of Norridge Wood to the north west of Warminster is identified as a strong feature. The A36 and A350 which cut through the landscape to the west of Warminster are referenced as disturbing the landscape pattern in the WLCA.

6.16 Views into the site are limited. The land is raised above the A36 which was formed in a cutting. The top of the highway embankment is then marked by significant vegetation in the form of a dense belt of trees in the southern half of the site and more sporadic trees within an established hedgerow to the northern part of the site. The eastern boundary of the site with the Bath Road has a dense belt of trees running the length of the northern part of the site (OM005) sealing off views into this part of the site from the east.

6.17 Parcel 2091 has a hedged boundary with the Bath Road. Some views are possible into the site through established gateways but generally views are relatively limited. Views are of the fields themselves with a number of agricultural buildings in the foreground.

6.18 The only possible views into the wider site would be from the elevated position of the ridge of Cley Hill. The distance between the site and Cley Hill is approximately 3km at this point. Taking into account the distance and the strong intervening tree planting, particularly along the south part of the western boundary, the impact on views from Cley Hill would be extremely limited. It is proposed that the landscape approach which is to be adopted at the WWUE could likewise be taken forward within Site 8.

6.19 The 'Planning for Warminster' document advises that significant landscape mitigation measures will be required and that the western part of the site formerly formed part of the Norridge Wood Ancient Woodlands and that the impact on historic landscape character should be assessed.

6.20 The suggestion is for the existing tree lined buffer to be augmented with additional planting along the length of the western boundary of the fields to provide a denser planted screen. The WWUE proposes woodland structure planting comprising of locally indigenous species to create a strong edge and separation between the town and the countryside. The current proposed allocation could be designed to dovetail with this strategy.

6.21 The introduction of the A36 bypass of Warminster in 1986 led to removal of part of Norridge Wood to facilitate its route. There are small remnants of the woodland which lie outside of Site 8 but the site itself is principally well managed agricultural land (Fig 12) [see attachment WARM13 for map]. It is not possible to discern without a detailed arboricultural report whether the band of trees highlighted below with blue arrows formed part of the wood. Map regression analysis indicates this could possibly be the case.

6.22 The well treed area at the northern tip of the site appears to have been planted more recently and based on map regression work did not form part of Norridge Wood. Any allocation of Site 8 would need to be 'landscape led'. The mature tree belts would be retained as a feature within the development so it should not be viewed as a ground to not allocate the site.

6.23 Overall the current site is less sensitive in landscape terms than the WWUE which is located in closer proximity to Cley Hill with views across the land. Given that the principle of the WWUE has been found to be acceptable it is argued that Site 8 can likewise be considered acceptable. The land in question forms a logical conclusion to the WWUE being situated as it is between two main roads to the west and east and a small access road to the south. It is adjacent to the WWUE and represents the completion of the infilling of the gap between the bypass and Warminster to the north and west of the settlement.

6.24 The land is situated in between the A36 and the Bath Road. The site offers unparalleled visual and physical containment when compared to competing sites on the fringes of Warminster. The landscape has been affected at this point by the introduction of the A36, the large roundabout, and to a lesser but still noticeable extent by the Bath Road.

6.25 The presence of these roads has limited the parcel of land size to reduce its usefulness for modern agricultural practices. There is clearly no argument to be made with this site that it may set a precedent for further expansion of the town, being contained as it is by the roads. In plan making terms it should be seen as a desirable site which may benefit from the WWUE facilities and enhanced connectivity whilst allowing for the necessary expansion of the town at a site which is not prominent from public view points.

6.26 The Council's assessment scores Site 8 'red' in terms of landscape impact. This is explained as being on the basis that there is a risk of landscape impacts through urban encroachment on the countryside in a location which does not adjoin the settlement boundary. The analysis does however go on to state that 'the site does however adjoin an existing allocation. Development that is well planned and subject to phasing could be able to overcome these concerns and be appropriate in this location'.

6.27 On the basis of this reasoning a score of 'red' seems unwarranted. Any, and indeed every, site which is coming forward as an option involves an urban encroachment on a countryside location. As has been referenced above the delivery of the site will not come forward in advance of the WWUE which will remove this concern about the site appearing isolated from the settlement.

6.28 The Council are heavily reliant on the WWUE both in terms of ongoing 5 year housing land supply and overall housing trajectory. It is included as part of the committed supply and outline planning permission is in place on the land directly to the south of Site 8. There is no question therefore that the WWUE will happen and the assessment of Site 8 should be re-graded to recognise this.

6.29 Given that the overall assessment of Site 8 identifies that it can be brought forward in a phased way without harm occurring to the landscape the score of 'red' should be revisited and a 'green' should be awarded for the site.

Traffic

6.30 Site 8 has been scored 'amber' for traffic with reference made to the site being 1500m away from a congested corridor. This is presumed to be a reference to the B3414 High Street/Market Place which experiences congestion at peak times.

6.31 The 'Planning for Warminster' document explains that the concern is principally that 'future development growth may increase pressure on east to west routes via Warminster town centre – only two routes currently facilitate this internal movement. This may cause rat running through the residential and rural roads'.

6.32 Site 8 would, in combination with the services and facilities which the WWUE will bring, act to contain traffic movements and limit flows into the centre of Warminster. All out-commuting from the settlement would be undertaken by direct connections to the A36 and A350. Vehicle movements into the centre of the town are likely to be primarily to reach the secondary school and for services and employment in the centre.

6.33 The WWUE will also deliver an enhanced bus service to Kingdown School which Site 8 could both benefit from and support through increased patronage. This along with a half hourly service into the centre of Warminster are secured by S106 legal agreement. The potential impact of further residential development would be somewhat mitigated in this location. Traffic flows into the congested area are unlikely to materially affect the existing situation.

6.34 Development of any of the other candidate sites could potentially result in similar if not higher levels of traffic movements given the poorer connectivity these sites will have. It is recognised that each site is scored 'amber' for traffic, so the scoring system does not say Site 8 is any better or worse in terms of transport impacts than other sites. This notwithstanding, Site 8 has, in our view, a better chance of being more self-contained, given its links to the WWUE and the existing surrounding employment sites, than other candidate sites. In this regard there is a strong argument that Site 8 could score 'green' for traffic.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered

generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

8. CONCLUSION AND REQUEST FOR CHANGES THROUGH THE LOCAL PLAN REVIEW CONSULTATION

8.1 The overall housing figure for Wiltshire should be increased to deliver flexibility in the supply of new housing and to avoid the Council losing a 5 year land supply. The Council previously published that throughout this plan period they would plan to maintain a 6 years (+ 5% buffer) housing land supply at all times. The overall housing figure mooted in the ESS would fail to achieve this and should be increased accordingly. The revisions to the plan are not 'positively prepared' or 'justified' having regard to the NPPF (paragraph 35 tests) failing to be aspirational.

8.2 Warminster has under provided for housing over the first 13 years of the plan period with just 39% of houses built over the first 65% of its duration, 498 homes behind where we might expect to be had development proceeded in an even way. The ESS fails to take into account the chronic under-provision of housing within Warminster, instead relying on the overprovision elsewhere in the Trowbridge HMA and rolling forward the housing targets which have not been met. The ESS should be seeking proportionate growth in each town.

8.3 Further greenfield land release(s) should be made at Warminster to re-distribute growth more evenly. Currently just 1.8% of the residual requirement for housing in the HMA is shown to be provided at Warminster, despite its size, containment and sustainability credentials. It has proven difficult to identify adequate supply in Trowbridge and part of this growth could be re-distributed to increase surety of supply.

8.4 None of the growth strategies (TR-A, TR-B or TR-C) will meet the required level of need and the ESS should be revised to deliver an ongoing housing land supply of 6 years (+ buffer).

8.5 Warminster currently has a very narrow base of housing land supply which should be widened to ensure that the chronic under-provision which has partially undermined the settlement's role within the county does not continue.

8.6 Context Planning Ltd represent both landowners in the proposed 'Site 8' and we can confirm that the amalgamation of the parcels is accepted by both landowners who would work together in bringing forward any allocation.

8.7 Site 8 and its proximity to the WWUE means that it will be able to both benefit from and support services and facilities in the larger allocation. Bus service improvements to the town and Kingdown Secondary School have been secured by legal agreement in the outline planning permission for the WWUE. The site is superbly located for employment with the nearby industrial estates and benefits from excellent connections to the A350 and A36. There are no heritage or flooding impediments to developing the site, unlike the majority of the alternative sites.

8.8 Site 8 is relatively well visually contained and will soon be viewed in the context of the WWUE. Existing mature tree lines within the site would be retained in any

Site 8, Warminster development layout. A significant landscaping scheme of further structural planting would come forward to reinforce the character of the site. The site is extremely well contained by the Bath Road and the A36 and it represents the opportunity to 'complete' development to the west of the town. Overall, the site is less sensitive in landscape terms than the WWUE.

8.9 Development of the site would be well contained with pedestrian and cycle access to all the facilities required for day-to-day living would be possible. With the development of the WWUE this will become a much less peripheral location. Improved public transport connections to the town will also be made.

8.10 Overall it is considered that Site 8 represents the most sustainable site of the presented options for development and that the option of extending the WWUE to the north is the most appropriate strategy for expanding Warminster. Each of the alternative sites presented for Warminster have significant in principle reasons why they would not be appropriate options as has been outlined.

8.11 There is a well-articulated case that the ESS will not meet the housing need identified for Wiltshire and would leave no flexibility in supply. It is essential that the overall housing target for Wiltshire and the Trowbridge HMA is increased. The chronic under-provision of housing in Warminster needs to be addressed through the allocation of more growth at the town. Site 8 represents the most appropriate location to meet the demand for growth and the Council are respectfully required to amend the ESS to allow for increased growth in Warminster and to allocate Site 8 for residential development in the draft plan.

Rep ID: Warm014	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): David Jarvis Associates
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Octavia Homes Ltd	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM14
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Octavia Homes considers that more emphasis should be placed on Warminster as a focus for growth within the Trowbridge HMA. The Interim Sustainability Appraisal indicates that the additional level of development proposed for Warminster will only have a minor adverse effect with regard to impacts on the historic environment and landscape. It also indicates that there would only be a minor adverse impact on highway congestion, compared to moderate adverse at Westbury. This indicates that Warminster can accommodate additional levels of growth. It is a sustainable location with a good level of facilities and public transport provision and should therefore be considered for higher levels of growth.</p>	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	

A further priority should be to deliver additional community amenities in the form of public open space, in conjunction with additional housing growth to enable delivery of such spaces.

WA3. Is this the right pool of potential development sites?

No.

Octavia Homes wish to promote land at Ashley Coombe in Warminster for residential development, as indicated on the attached plans. It is considered that the land can be brought forward either as a single plot or as two distinct phases, depending on how the Council's housing strategy for Warminster evolves over the coming years • Plot 1 – a 1.5ha plot with direct access onto Ashley Coombe, which can be brought forward immediately for a residential development of approximately 40 dwellings, as a logical and sustainable option to meet the small residual housing need currently identified at Warminster, and a first phase of development that could eventually take in Plot 2 (below).

- Plot 2 – this is a larger portion of land adjoining Ashley Coombe and which would be brought forward as a further phase (80 dwellings approximately) following or in conjunction with development of plot 1 (above). In terms of constraints, it is recognised that part of the site lies within the 250m Sewage Treatment Works buffer zone and this area will remain undeveloped to ensure no conflicts with the STW. You will note that Plot 2 also takes in land off Fanshaw Way, which the Council has already identified as a site for further assessment as part of the current Reg.18 Local Plan Review consultation (referred to as “Site 3 – Land adjacent to Fanshaw Way”). All land is within the control of Octavia Homes and so is included as a single comprehensive plot. Octavia Homes have looked in more detail at the Fanshaw Way plot (site 3) and consider that its characteristics lends itself more effectively to delivery as part of the wider site promoted here, as opposed to a stand-alone site.

On this basis, Octavia Homes advises that Plot 1 is a suitable site for development now, as a substitute for the Fanshaw Way plot (Local Plan Review assessment site 3). Should Plot 2 come forward as an allocation, it is considered that the Fanshaw Way site should come forward as part of development of this wider plot. It would be utilised as part of a site-wide drainage strategy, for biodiversity/green infrastructure enhancement as well as to potentially provide a secondary access, certainly for pedestrians/cyclists. It would also accommodate an area of public open space that would be easily accessible to the wider Warminster community.

WA4. What land do you think is the most appropriate upon which to build?

Further housing provision at Warminster will require development of one or more greenfield sites on the edge of the settlement.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

No

WA6. Are there any issues or infrastructure requirements that should be identified?

No

Further comments

No

Rep ID: Warm015	
Consultee code: Other	Consultee Organisation (if applicable): East Boreham Residents Action Group
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Considering the scale of growth already agreed for Warminster until 2026, it is considered fair that only a further 60 houses are required until 2036. Building purely residential developments, without integral supporting infrastructure puts undue extra pressure on existing infrastructure such as medical, emergency services, roads, transport, schools etc. These additional 60 houses should come from brownfield sites or existing sites agreed for development in the 2026 Plan and definitely not further greenfield sites. The brownfield site target should always exceed the greenfield particularly greenfield sites outside the designated development boundaries around market towns and approved by Wiltshire Core Strategy.</p> <p>As regards the scale of growth for Wiltshire, CPRE have produced a report stating Wiltshire has already exceeded its required housing totals by 140% and therefore challenges the need for any further development throughout Wiltshire until 2036.</p>	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

Warminster town centre consists of empty shops, betting shops, tattoo parlours, charity shops, hairdressers, coffee shops and only a few quality specialist retail shops to draw residents into the centre to spend money as indicated as one of your priorities – the only exception is the excellent range of supermarkets that it is suspected actually draw residents into the town centre. The danger of building only residential developments is that it creates dormitory towns with residents then commuting to other towns for employment and shopping. The Warminster Urban Extension (WUE) initiative is the way forward – encompassing houses, employment areas and supporting infrastructure within one site.

WA3. Is this the right pool of potential development sites?

No. Due to the low number of houses Wiltshire believe are required (disputed by the CPRE) in Warminster, only windfall, brownfield sites or existing approved development sites should be considered. No greenfield sites should be included particularly those outside town development boundaries such as several of those indicated for Warminster.

WA4. What land do you think is the most appropriate upon which to build?

The WUE is capable of absorbing these additional 60 houses. Why develop other greenfield sites, with various degrees of development problems, when the plans for WUE include sites for employment and infrastructure (schools, medical facilities, shops etc). The other sites identified for 60 houses are purely residential bring increased pressure to the existing stretched town infrastructure. Windfall, brownfield sites or the WUE will meet this additional figure for Warminster until 2036.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered

generally or in respect of individual sites?

Your identification of site 2074 & 2075 (MOD property) as possible development sites were rejected by the MOD during the drafting of the 2026 plan. The present withdrawal of Armed Forces from Germany and expansion of military sites around Salisbury Plain, including Warminster, make it extremely unlikely this policy will be changed. A visual inspection of the existing integration of MOD buildings and facilities on the proposed sites will reinforce this view.

No factors have changed for Site 603 since rejection within the draft 2026 plan by the examining Planning Inspector. These factors included environmental, access, effect on surrounding heritage sites and Bishopstrow Conservation Area, loss of excellent agricultural land and phosphate discharge into the River Wyle/Avon. It is unclear why this site has been included again when so many of Wiltshire Councils specialist officers, local residents and English Heritage objected so strongly to the planning application for this site during the same period. This site was also rejected by 2 previous examining Planning Inspectors during review of planning applications – why therefore is Strategic Planning wasting time by including this site?

WA6. Are there any issues or infrastructure requirements that should be identified?

Wiltshire Council policy should be to develop sites with employment and supporting infrastructure integral to the site, without imposing additional strain on existing services or creating dormitory towns.

Further comments

[NAME REDACTED] the Government appointed Planning Inspector who reviewed the draft Wiltshire Council 2026 Plan and on 23rd January 2020 reported his findings to Wiltshire Council, concluded site 603 should be deleted from the draft Plan or the whole Plan would become null and void. Nothing has changed within site 603 since that finding and therefore it is very surprising the site has been included again until 2036. Does its inclusion mean the 2026 Plan is now null and void and is he aware it has been included again?

It is also believed Wiltshire Council have still to complete a SFRA 2 for Warminster which according to the national planning framework negates the ability to approve any development until it is completed.

Rep ID: Warm016	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): The Campaign to Protect Rural Wiltshire (CPRE)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>There should be total constraint on any future additional house building until the current western development programme is near completion.</p> <p>There is potential in the town centre for brownfield redevelopment of unviable office or retail units.</p>	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
<p>Reappraisal of the town centre is a priority in order to determine its relationship with huge greenfield development area. This should be carried out by the Neighbourhood Plan in partnership with Wiltshire Council.</p>	

Transport infrastructure. Does the new development area, and all other outlying more recent developments have safe cycle and pedestrian access to the town and the station. If not, they must be planned in. Improvements to bus access to all areas, good bus stops and regularity.

WA3. Is this the right pool of potential development sites?

All the sites listed have strong environmental constraints. None should be considered at this time nor until a post Covid report is prepared giving the true state of local employment, workplace growth and commuting. Consideration of any greenfield site has to be examined from an environmental view, and climate change considerations, before all else.

WA4. What land do you think is the most appropriate upon which to build?

Emphasis should be on brownfield, encouragement to small business units and start-ups. Access to and use of the rail station takes priority over any road improvements.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

The Covid-19 pandemic has highlighted the need for people to get out into the countryside for the physical and mental health so the need to protect undesignated green fields as well as green belt and AONB's is vital. The areas immediately adjacent to urban centres should be protected and should benefit the local population as sources of recreation, enjoyment (visual and physical) and food production.

New buildings must conform to highest levels of construction using high standards of insulation, triple glazing, solar panels, Biomass boiler, heat pumps etc.
WC to work with Town and Parish Councils to achieve sustainable development and town centre improvements and taking into account climate change, carbon reduction, the value of preserving wildlife, the importance of maintaining open green spaces for health, exercise and wellbeing and respecting the importance of Warminster's surrounding landscape and heritage.

WA6. Are there any issues or infrastructure requirements that should be identified?

Any bypasses along the A350 will only encourage WC to "realise their dream" of an A350 "expressway" to the south coast which must be discouraged because Highways England have always advised that the preferred routes are either, M4/ A34/ M3/M27 or M4/ A46/ A36/ M27.
The Trans Wilts train route has proved very successful despite early pessimism so therefore Warminster's train station amenities need improving to come in line with this successful service.

Further comments

Rep ID: Warm017	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): PlanningSphere
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Footstep Active Living Ltd (FAL)	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM17
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>(ii) Spatial Strategy and distribution of growth in the Trowbridge HMA</p> <p>4.7 Warminster falls within the proposed Trowbridge Housing Market Area, which replaces the former North and West Housing Market Area. The change from three to four HMAs is broadly supported. However, for the reasons explained below, we do not consider that the spatial strategy for delivering the growth is sound on the basis of deliverability, or through acknowledgement of societal change that has been accelerated by the covid pandemic.</p> <p>4.8 The Regulation18 spatial strategy for the HMA is reliant to high degree on the delivery of the strategic growth options at Staverton and Hilperton as part of the growth strategy for the principal settlement of Trowbridge. At the other end of the settlement hierarchy, it is noted that the Regulation 18 Spatial Strategy is relying upon Neighbourhood Plans to deliver housing growth at Large Villages and other rural settlements in the rural hinterland outside principal settlements and market towns across the whole county.</p>	

4.9 Wiltshire Council has a poor track record in timely delivery of large urban extension strategic sites, such as Ashton Park in Trowbridge and the West Warminster Urban Extension, both of which were allocated in the adopted Core Strategy. As noted in the planning history section above, the WWUE only received outline permission in December 2020 following a 5-year planning process. Reserved matters will need to be approved, and infrastructure implemented before the WWUE can commence the delivery of housing.

4.10 At the other end of the scale, Neighbourhood Plans have failed to make any real meaningful contribution to housing delivery in Wiltshire. For example, the Warminster Neighbourhood Plan is effectively a 'constraint plan', which did not make any provision for additional housing growth.

4.11 Given that the covid-pandemic has accelerated the trend towards flexible home-working and internet shopping, and that there is now a clear road map to the decarbonisation of private transport (electric vehicles), with transformation expected to take place over the plan period to 2036, we submit that the proposed Regulation 18 spatial growth strategy is too weighted towards the principal settlements. We consider that more growth should be directed towards market towns and rural areas. This approach would place less reliance upon volume home builders to deliver a small number of complicated strategic sites (for which there is poor delivery track record in Wiltshire) and would enable a greater role for SME regional housebuilders to deliver the housing requirement through a larger number of smaller scale housing developments in market towns and rural areas.

4.12 In the context of Wiltshire Council not currently being able to demonstrate a 5-year housing land supply across its whole administrative area (NB. 4.56 years in the last published Annual Monitoring Report with a base date of April 2019), combined with the NPPF requirements, as summarised above, and the importance of the SME sector in delivering smaller and medium sized sites to diversify choice of new housing provision, it is in our view imperative that the Council allocates sufficient smaller/medium sized sites at the Market Town level of the identified settlement strategy. This is particularly important in the Trowbridge HMA where the deliverability of large-scale strategic sites is both technically and politically challenging.

4.13 Under the proposed growth strategy for Warminster, the Local Plan Review identified need for Warminster is 2050 homes over the plan period 2036. Having regard to existing commitments the residual need is estimated at 60 homes. The Council is anticipating that a c.130 homes will come forward through windfall/brownfield opportunities over the plan period to 2036.

4.14 Therefore, for the reasons outlined above, and to ensure the delivery of new open market and affordable homes in the Trowbridge Housing Market Area, it will be imperative that additional housing allocations are made in the Local Plan Review to ensure continuity of supply over the plan period to 2036.

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

WA4. What land do you think is the most appropriate upon which to build?

Introduction

1.1 PlanningSphere have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of the Footstep Active Living Ltd (FAL) who are the prospective purchasers of the subject site, land at Church Street, Warminster. The subject site is outlined on the Site Location Plan shown at Appendix A [see attachment WARM17].

1.2 This representation follows a previous application proposal by a volume home builder who no longer has an interest in the site (LPA Ref:13/05089/FUL). The development potential of the site has been re-assessed from first principles by FAL who have commissioned drainage, heritage, transport and landscape technical appraisals. These studies have confirmed that the site is technically deliverable.

1.3 This representation contends that in order to meet the required plan making test of 'soundness' and maintain mixed-tenure housing delivery in the Trowbridge Housing Market Area over the plan period to 2036, it will be necessary for the Council to allocate of the subject site for residential development and public open space in the Local Plan Review.

1.4 We would welcome an opportunity to discuss the promotion of this site through subsequent stages of the Local Plan Review with the Council's Spatial Planning Team in due course.

(i) Site Description and Context

2.1 The subject site extends to approximately 4.08 hectares and lies to the north west of Church Street, Warminster. The prospective allocation site is outlined in red in the Site Location Plan at Appendix A. [see attachment WARM17 for map]

Figure 1: extract from the Landscape Scoping Report which shows the location of the site in relation to the existing built extent of the town. [see attachment WARM17 for map]

2.2 The subject site lies to the north west of the town centre. A full description of the site's location and non-car accessibility is set out in the Transport Technical Note at Appendix C [see attachment WARM17]. This report also includes details of the proposed principal point of vehicular access, which has been discussed informally with the Highway Authority.

2.3 The site's heritage context is sensitive due to the proximity of the grade II* listed St Denys' Church and other heritage assets that are proximate to the site. An assessment of the relationship of the subject site with existing heritage assets, and the archaeological potential, is set out in the Heritage Assessment at Appendix D [see attachment WARM17].

2.4 A full description of the topographical and landscape context is set out in the accompanying Landscape Scoping Report at Appendix E [see attachment WARM17].

2.5 Noting the proximity of the River Were which crosses part of the site, a preliminary Flood Risk Assessment and Drainage Strategy has been formulated to assist in identifying the potential developable area, and the measures that will be required to mitigate against flood risk. The Drainage Strategy is included at Appendix F [see attachment WARM17].

(ii) Existing Lawful Use and Planning history

2.6 The subject site has an established existing lawful use as agricultural land but is not presently in productive use. Planning history recorded on the Council's public access system includes the following speculative application submitted by Redrow Homes: [see attachment WARM17 for tables]

Reference Description Decision

13/05089/FUL

Development of 60 residential dwellings, open space, sustainable urban design, vehicular and pedestrian accesses, landscaping and related infrastructure and engineering works.

Refused

04.03.2014

2.7 Other relevant planning history includes recent approval of the West Warminster Urban Extension outline planning permission, as summarised in the table below:

Reference Description Decision

15/01800/OUT

WWUE

Demolition of a series of agricultural sheds and one residential dwelling and the delivery of up to 1,000 dwellings (Class C3); a local centre of 0.56ha (to accommodate commercial development falling under Use Classes A1-A5, C2, C3 and D1); an employment area of 5.6 hectares (to accommodate various businesses falling under Use Classes B1, B2 and B8); a primary and part-secondary school (Use Class D1); formal and informal recreational open space including children's play areas, allotments and changing facilities; car parking; hard and soft landscaping including a noise bund along part of the western boundary; storm water attenuation ponds; foul and surface water drainage infrastructure; and provision of road access infrastructure to include roundabout accesses on Bath Road and Victoria Road.

Permitted

15.12.2020

(iii) Existing planning policy context and constraints

2.8 The Development Plan for the site comprises:

- Wiltshire Core Strategy (adopted January 2015);
- Warminster Neighbourhood Plan (made November 2016); and
- Wiltshire Housing Site Allocation Plan (adopted February 2020)

2.9 Applicable designations from the Wiltshire Core Strategy proposals map are shown in Figure 2 below: [see attachment WARM17 for map]

3.0 Suitability of the Site for a Mixed Tenure Housing Allocation

(i) Legal ownership and delivery mechanism

3.1 The subject site is owned by four individual landowning parties. Footstep Active Living Ltd have a long-term option agreement.

(ii) Developable Area Parameters

3.2 Having regard to the site constraints and opportunities, which have been evaluated in detail by the project team, the project landscape architect has formulated a parameter plan, identifies the extent of developable area. This extends to approximately 1.7 ha. Applying a 35 dwelling per hectare (dph) density yields a potential site capacity of 60 No. residential units.

Fig 3. Extract from the Proposed Parameter Plan – shown in full at Appendix B [see attachment WARM17]

3.3 The elements of the indicative Parameter Plan include the following:

- Vehicular access: is proposed via a simple priority junction from Bath Road / Church Street with footways and cross over details. A design that has been informally agreed with the Highway Authority is shown in the Transport Technical Note, which is included at Appendix C of this statement.

Fig 4. Extract from the Proposed Access Plan from Appendix D of the Transport Technical Note, showing the proposed priority junction [see attachment WARM17]. The internal spine road will then cross the River Were to provide access to the potential residential development site.

- Ecological mitigation: the subject site is not located in a bat consultation zone. However, it is acknowledged that the watercourse and habitat on site that has potential support protected species. There is clear potential for ecological enhancement through the provision of green and blue infrastructure. The Parameter Plan at Appendix B also makes provision of dark green buffers against existing hedgerows to ensure that proposals will not adversely affect bat foraging activity. Given the size of the landholding it is considered that it will be possible to address the 10% biodiversity net gain requirement on site.

- Landscape and heritage mitigation: the Landscape Scoping Report at Appendix E includes a landscape strategy that also takes account of the Heritage Assessment set out in Appendix D. The site already benefits from existing vegetated boundaries. The landscape strategy recommends a strengthening of the boundary to the south to screen views Church of St Denys and its associated graveyard. Similarly, it is proposed to also strengthen the northern boundary to provide enhanced screening from the

public open space and existing residential development to the north and east. There is potential to improve the surfacing and functionality of the public right of way that crosses the site, whilst retaining the rural experience for future users. The proposed Western field will be offered as public open space and will act as a permanent buffer between the business park to the west and proposed development. This area of the site could also include community allotments.

- Drainage: FAL instructed Campell Reith to provide a flood risk mitigation and drainage strategy – a summary technical note is included at Appendix F. Detailed fluvial flood modelling of the River Were has been undertaken. This has confirmed that safe access can be obtained from Bath Road, and a suitable housing developable area, as annotated on the Parameter Plan, can be created outside the 1:100 flood plain (with an 85% climate change allowance). Due to a high water table, drainage via infiltration is not likely to be feasible. The surface water drainage strategy has been designed to drain positively into the River Were via a headwall arrangement combined with drainage swales and attenuation basins as part of a combined green and blue infrastructure strategy. Foul drainage will be discharged to the adopted foul sewer that runs through the site as a connection point to be agreed with Wessex Water.

(iii) Proposed further work in progress to develop the evidence base

3.4 Following the submission of the Regulation 18 representations, the project team will commission the following further work:

- Arboricultural survey
- Geophysical survey
- Infiltration testing
- In-season ecological surveys

3.5 The project team will be willing to share this information as part of an evolving technical evidence base with the Council's Spatial Planning Team.

3.6 At the appropriate time, FAL, will appoint a masterplan architect / urban designer to formulate an illustrative masterplan. This will then be tested internally before being progressed as a pre-application enquiry. Feedback from the pre-application enquiry can then be added to the technical evidence base in advance of the Local Plan Review examination in due course. FAL will commit to undertaking public consultation in advance of submitting any formal planning application.

(iii) Comment on the subject site (Site 5 in the Site Selection Report)

4.15 It is understood that the external consultants acting for the Council have assisted in assessing prospective development sites. Wiltshire Council's high-level summary assessment of Site 5 (the subject site) is set out in the table below: [see attachment WARM17 for map]

4.16 The high-level 'traffic light' assessment of the subject site is not considered to be well founded. We have set out comments below in respect of the five criteria in the table below: [see attachment WARM17 for table]

WC Traffic Light Assessment PlanningSphere Response Accessibility The MWT assessment at Appendix C confirms that the subject site (5) is highly accessible. On this basis, we agree with the 'green' categorisation. Flood Risk Parts of the site lie within

in Flood Zone 1, 2 and 3. The proposed developable area and vehicular access lies wholly within FZ1. A technical solution is available for flood risk mitigation as described in Flood Risk and Drainage Strategy technical note at Appendix F. Surface water attenuation and disposal at less than the existing greenfield run off rate to existing watercourses can also be achieved. On this basis, we agree with the 'orange' categorisation but the report at Appendix F demonstrates how the flood risk constraint can be addressed. Heritage The Heritage Assessment at Appendix D assesses the relationship of the site with the identified heritage assets, including the grade II* listed church. The Parameter Plan has considered the proximity of this heritage asset, and through the strengthening of the existing screen planting it has been concluded that that setting of church can be preserved. On this basis, we agree with the 'orange' categorisation. Landscape The subject site is not located within a designated AONB and is not subject to local level landscape designations. The landscape strategy that has informed the Parameter Plan, will provide adequate landscape mitigation as explained in the Landscape Appraisal at Appendix E. On this basis, we agree with the 'green' categorisation. Traffic The Transport Technical Note explains that it will be possible to formulate an appropriate vehicular access in the form of a simple priority access junction to service the proposed allocation from Church Street / Bath Road (see Appendix C). On the basis that it has been demonstrated that an access solution is available, and that this has been informally agreed with the Highway Authority, we disagree with the 'orange' categorisation and have re-assigned a 'green' categorisation.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

In strategic planning terms, we are concerned that the growth distribution strategy set out in the Regulation 18 consultation draft is too weighted towards large scale complex sites adjacent to principal settlements. Having regard to societal and technological changes that have been accelerated by the covid-pandemic, we advocate a more decentralised strategy to meet the growth requirement with more development distributed to market towns and rural areas. Such an approach would enable the SME housing building sector to play a greater role in the delivery of the housing requirement, which would ensure a more diverse and

even supply of new housing over plan period. SME developers also tend to deliver housing at a higher build and design quality than volume home builders, as has been shown in consumer satisfaction surveys.

5.2 In order to meet the test of soundness, we consider that the Council should allocate the subject site. This is on the basis that the subject site is: (i) available; (ii) technically deliverable; and (iii) is viable for delivery early in the plan period.

5.3 In summary, the allocation of the subject site would deliver the following benefits:

- A site suitable for delivery of circa 60 homes by an SME home builder and viable to deliver a 30% element of affordable housing provision.
- Given the site's sustainable location and close proximity to the town centre the site may be appropriate for the provision of specialist care or age-related housing
- A safe and suitable vehicular access solution from Church Street / Bath Road.
- The ability to mitigate the impact of development on the wider landscape.
- The ability of address ecological constraints and deliver biodiversity net gain on site.
- A drainage strategy that will mitigate against flood risk as part of an integrated green and blue infrastructure strategy.
- Provision of a substantial areas of onsite publicly accessible open space and allotments.
- Provision of public access through the site connecting into the wider footpath network and maximizing opportunity for non-car accessibility.

5.4 Given we have demonstrated that the subject site is suitable and technically deliverable, we request the Council acts proactively to plan for housing need in the Trowbridge Housing Market Area and allocate site 303 for approximately 60 No. dwellings and associated public open space.

PlanningSphere have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of the Footstep Active Living Ltd (FAL) who are the prospective purchasers of the subject site, land at Church Street, Warminster. The subject site is outlined on the Site Location Plan shown at Appendix A.[see attachment WARM17]

This representation follows a previous application proposal by a volume home builder who no longer has an interest in the site (LPA Ref: 13/05089/FUL). The development potential of the site has been re-assessed from first principles by FAL who have commissioned drainage, heritage, transport and landscape technical appraisals. These studies have confirmed that the site is technically deliverable.

This representation contends that in order to meet the required plan making test of 'soundness' and maintain mixed-tenure housing delivery in the Trowbridge Housing Market Area over the plan period to 2036, it will be necessary for the Council to allocate of the subject site for residential development and public open space in the Local Plan Review.

We would welcome an opportunity to discuss the promotion of this site through subsequent stages of the Local Plan Review with the Council's Spatial Planning Team in due course.

Rep ID: Warm018

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WA1. What do you think to the scale of growth? Should there be a brownfield target?

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Please ensure you protect and value our local green space as designated in the Warminster Neighbourhood Plan. It is greatly cherish and used by thousands of people and yet constantly under threat of opportunistic development as Folly Lane designed LGS and Allotments are adjoining/bordering core developments either current e.g. 2026 plan WWUE or future 2036 plan and landowners all have either pre-apps or SHLAA status. West Warminster has taken all the development Warminster has to deliver to date. Please don't look to let us loose this last remaining areas of great importance.

The pandemic has taught us people value nature and ease of access within the town to these open wild spaces or green places to work and enjoy. We would love the freedom to do more with these spaces, so please don't under value them and dismiss them as a waste with your new formula which is not available to the public. Give them more protection, help the community shape where they live.

Rep ID: Warm019	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Asset Sphere Ltd
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM19
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
The scale of growth is achievable and realistic. NO brownfield target required	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Sustainable materials and constructions techniques	

WA3. Is this the right pool of potential development sites?

yes

WA4. What land do you think is the most appropriate upon which to build?

The land north of Bishopstrow Road, Warminster with sympathetically designed houses using sustainable methods of construction and materials

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

no

WA6. Are there any issues or infrastructure requirements that should be identified?

EV Charging network

Further comments

Rep ID: Warm020	
Consultee code: Landowner	Consultee Organisation (if applicable): Context Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM20
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>4. WIDENING THE SUPPLY BASE IN WARMINSTER</p> <p>4.1 Warminster has itself been a victim of a narrow base of sites to meet housing demand. Compound delays to the WWUE are directly attributable to the chronic under-delivery outlined. The Council risks making the same mistake again if the base of supply is not widened through the Local Plan Review process. Supply has been choked off because 'all the eggs were placed in one basket'.</p> <p>4.2 Whilst an outline planning approval has been granted for the main part of the WWUE this took 5 years to be approved. The phased delivery of reserved matters submissions will not be a quick process. The suggestion within the 'Planning for Warminster' document that 900 homes will be delivered by 2026 appears unachievable and is not corroborated by the 2019 Housing Land Supply Statement which indicates forecast supply to be 470 dwellings during this period.</p>	

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

7. THE ALTERNATIVE SITES

Site 1- North Warminster, land north of Elm Hill and land south of Elm Hill

7.1 The site selection report for Warminster acknowledges that this site is poorly related to Warminster. The landscape is referenced to be highly sensitive particularly given the hillslope location of the site. A development of the size being promoted would be inappropriate at a site which does not bound the settlement of Warminster.

7.2 The 'Planning for Warminster' document records that a primary school is required for the development to go forward. A primary school typically requires a development of around 800 dwellings to fund and sustain. The site whilst large is not of adequate size to include development of a school. Development on the scale proposed for this site would significantly exceed the ESS. This site should be discounted in stage 3 (the next phase) of the assessment.

Site 2 – Land north of Woodcock Road, land south of the Railway Line and Land east of the Dene

7.3 This site was removed as a potential allocation at the time of the WHSAP. The Inspector in his report noted that 'there is likely therefore to be a significant cumulative impact on the setting of both designated and undesignated heritage assets in the area...serious doubts remain over whether a form of development would be possible that would not have an unacceptable degree of impact on the character, appearance or significance of heritage assets. This would be contrary to the requirements of the NPPF'.

7.4 He went on 'notwithstanding the need for housing, I am not convinced that the benefit of development would outweigh potential harm in this location. The allocation of the site is therefore unjustified and contrary to national policy and it should be removed'.

7.5 The merits of an outline planning application for the site were tested at the same time and it was withdrawn to avoid a refusal. As well as serious concerns about the impact on designated and non-designated heritage assets there were substantial objections from the landscape officer and the highways team.

7.6 Given the planning history of this site it should not have reached this stage of the process. It should be removed at this stage from consideration.

Site 3 – Land adjacent to Fanshaw Way

7.7 This is a green field site which relates very poorly to the settlement. It only adjoins the settlement on its north eastern boundary. If developed it would appear as an oddly detached intrusion of residential development into the countryside. The landscape setting of Warminster at this point is extremely important and this development would cause significant landscape harm.

7.8 Planning permission has previously been refused for residential development of this site which included the land to its west. The development would need to be accessed from a modest residential cul-de-sac. It would not be suitable for a significant development and it cannot be altered to be made more suitable. This site should also be discounted on highways grounds.

7.9 The site is identified as being vulnerable to ground water flooding which should lead to it being discounted given there are sequentially more preferable sites from a flooding perspective.

Site 4 – Land at Warminster Common and land south of Wren Close

7.10 This site only borders the settlement boundary on its northern edge. With agricultural fields to its west and east, development would protrude significantly from the existing built form of the settlement and unacceptably harm landscape character. Planning permission was previously refused on two occasions for a large residential development of these fields.

7.11 The Council's analysis recognises the site is unfavoured having regard to its likely impact on traffic. It is more ecologically sensitive than other options and there is inadequate evidence regarding whether a development could be designed to suitably mitigate for impact on bats and dormice. For these reasons this site should be discounted.

Site 5 – Land at Church Street

7.12 Significant portions of this site are located in flood zone 2 as well as being vulnerable to both fluvial and groundwater flooding. As such it would clearly not be a sequentially preferable site to develop when alternative sites such as Site 8 are located outside of the flood zone and can reasonably be developed without increasing flood risk on or off site.

7.13 The site performs an important role as part of the setting of the Grade II* Parish Church of St Denys and the Warminster conservation area. A planning application was refused permission in 2013 with 9 separate reasons for refusal for a proposal of 60 dwellings on the site. Several of the reasons were not matters of detail but in principle objection to the prospect of a residential development of the site.

7.14 It is very clear that given the position adopted by the Council previously in respect of a planning application, and the heritage and flooding constraints in particular, this site should be discounted at this stage.

Site 6 – Land adjacent 89 Bath Road, Warminster

7.15 This site forms part of the housing land supply of gypsy and traveller pitches for the HMA. It is required to deliver 4 pitches in line with the permission granted in 2015 (as outlined in the 2018 Five Year Supply Statement for Gypsy and Traveller Sites - August 2019).

7.16 The Council are reliant on this site coming forward for this purpose to avoid a shortfall in the supply of gypsy and traveller sites becoming apparent. The opportunity cost of developing for residential housing would be too great in this instance given the challenges faced to deliver gypsy and traveller pitches within the county.

7.17 The site is in any event a small site which would only be suitable for a minor residential development. As such it would fail to provide an element of affordable housing which is required as part of the overall housing mix to ensure that the objectively assessed need of the HMA is met. The site should be discounted on the basis of these factors.

Site 7 – 44 and 48 Bath Road

7.18 This site is opposite Site 8, adjoining the Crusader/Warminster business park. The 'B Class' type uses directly to the east of the proposed site might have the potential to create nuisance were this site to be taken forward. The existing access would require significant improvement on land which appears to be outside of the parcel to provide the necessary splays.

7.19 This side of the Bath Road has a more commercial character and this is likely to be perpetuated if the industrial estates are expanded as envisaged in the Neighbourhood Plan. A residential development in this location would appear incongruous having regard to surrounding land uses. This site would be better suited to an employment allocation were it to be developed.

7.20 Planning permission was refused in 2018 for 3 reasons to develop the site for a total of 6 dwellings. The application failed to provide a noise impact assessment and was considered to be potentially prejudicial to the amenities of future occupants given the site's relationship to the industrial estate. Development of the site was considered to contravene landscape and ecology protection policies. Development of the scale envisaged would also not provide for affordable housing. For these reasons this site should be discounted.

Site 9 – Land at New Farm, Warminster

7.21 This site is physically removed from Warminster. Only a small portion of the site would adjoin the built form of the town. This site would greatly extend the form of Warminster harming its distinctive and contained layout. It would be the most damaging of the presented options in terms of landscape impact. The Council's assessment describes the area where this development would attach to the settlement as a sensitive rural edge.

7.22 Development on the scale proposed for this site would significantly exceed that envisaged in the ESS and is clearly sequentially less favourable than other development sites like Site 8. This site should be discounted in stage 3 of the assessment.

WA4. What land do you think is the most appropriate upon which to build?

5. THE PROPOSAL SITE

5.1 My Client's land is shown in the below (Fig 4) and (Fig 5). [see attachment WARM20 for figures]

5.2 The land holding incorporates approximately 3.5ha of developable land when taking into account the need to safeguard existing trees along the boundaries and a belt of trees which cross the site. The existing western boundary would be proposed for further tree planting in the form of a belt of a minimum of 10m in width which would be likely to reduce the developable area by a further 0.2ha. WC would require on site open space provision and it is proposed to at least meet the minimum level required.

5.3 Warminster has adequate levels of employment space being planned for when taking into account the WWUE will provide 6ha and the balance is to be provided through smaller allocations. The land to the east of my Client's site is also put forward through the NP for allocation in future for employment needs. The shortfall in development within Warminster has been shown to be in housing numbers rather than employment space. It is considered that my Client's land could be expected to contribute up to 110 dwellings towards the unmet housing requirement of which 30% would be affordable dwellings.

5.4 The land at Brick Hill could be amalgamated with the land parcel which direct adjoins it to the south (2091) (see Fig 6) [see attachment WARM20 for figure]. Both landowners are clients of Context Planning Ltd and they are able to commit to work together to bring forward the sites as one development. Given that the Council's consultation expresses a preference for these sites to be amalgamated the following sections of this representation consider the merits of the combined site (see Fig 7)[see attachment WARM20 for figure] which is known by the Council as Site 8. Site (2091) is shown in the SHELAA as having capacity for up to 132 dwellings and it is 4.3Ha in size.

6. THE CASE FOR ALLOCATING POTENTIAL DEVELOPMENT SITE 8

Accessibility

6.1 The Council's provisional assessment outlined within the Site Selection Report for Warminster scores the site as 'amber' for accessibility. The basis for this grading is the distance the site sits from the centre and the effect this will have on accessibility of those services and facilities. However, the site is not categorised as having an unacceptable level of accessibility.

6.2 In respect of accessibility it is important to recognise that the WWUE will both greatly increase the level of services and facilities close to Site 8 whilst also delivering much improved connections to the centre of Warminster.

6.3 There is a specific requirement outlined within the WCS CP31 for the WWUE to provide a new bus service to the town centre. WC's Infrastructure Delivery Plan makes clear that the bus service should be a 30 min frequency (on weekday daytimes) connecting the WWUE and the town centre and that this will be delivered early on in the development. There will also be a bus service provided for school children to get to Kingsdown School which is on the eastern side of Warminster town centre.

6.4 The below (Fig 8) [see attachment WARM20 for figure] is an extract from the travel plan which supports the approved outline application which shows a new bus route with a 30 min frequency to be delivered servicing the roundabout access from Bath Road. The provision of the bus service is a requirement of the WWUE. The allocation of Site 8 will increase patronage of the new bus service making it a more sustainable long-term service. In light of these points it can reasonably therefore be taken into account in considering the suitability of my client's land. This point notwithstanding my client's land performs comparatively well to other candidate Warminster sites.

6.5 Site 8 benefits from excellent connections to both the A350 and A36 and would reduce the level of cross-town traffic which is an acknowledged problem within Warminster. my client's land benefits from its close proximity to the Warminster Services which is less than 300m from Site 8. The Warminster services provides a Travelodge hotel. Several restaurants including Little Chef, Burger King and Subway. It also has a BP garage and shop which provide for daily shopping requirements.

6.6 The WWUE will soon provide for a local centre with use classes A1-A5, D1 (now largely Class E) community facilities and a new one and a half form primary school. There is a public footpath which connects the lane off Bath Road directly into the WWUE so it will be possible in the future for pedestrians and cyclists to access the local centre of the WWUE directly without needing to walk alongside the Bath Road and back into the development.

6.7 Site 8's has excellent access to employment opportunities. The Crusader Business Park and Warminster Business Park are located within walking distance of the site and are major employment sites within Warminster. The WWUE also proposes an area of employment comprising some 6 hectares at the northern tip of the allocation. Given also the proximity to the A36 and A350 the site is well located for local employment opportunities with excellent communications links.

6.8 The Warminster Neighbourhood Plan (NP) is a made plan and therefore forms part of the Development Plan. Fig 9 [see attachment WARM20 for figure] is an extract from the NP which shows the land to the east of my client's land has also been identified as a new/potential employment site. This is significant for two reasons firstly it shows that further employment is proposed within walking distance of my client's site thereby further enhancing its sustainability credentials and secondly the principle of development to the north of the existing settlement area has been considered to be acceptable in principle and the settlement will be expanded in this direction.

6.9 Access can be gained from the site onto the Bath Road. There is an existing access junction onto Bath Road which offers good visibility splays in both directions. The access would be capable of dealing with an increase in traffic.

6.10 The WWUE would come forward in advance of Site 8 in terms of its delivery, with it benefitting from an existing outline planning permission and reserved matters in the process of being prepared for the portion of the allocation. The Council itself predicts that 900 homes will be delivered by 2026. Site 8 would likely be brought forward in a similar manner with an outline application to be followed with reserved matters submissions. Implementation of an allocation would be unlikely to occur before the northern tip of the WWUE is built out, particularly because there is a commitment in the draft phasing for the employment land at the northern tip of the WWUE to be delivered early in the programme.

6.11 The 'amber' score for accessibility is, it is respectfully put, an unreasonable position to adopt. At the point at which Site 8 would be built out, it would have excellent accessibility to all necessary services, facilities and job opportunities on foot but also a highly regular connection by bus to the centre of the town itself. For the above reasons a 'green' score would be more appropriate.

Heritage and Flood Risk

6.12 Site 8 has been scored 'green' for flood risk and the land is situated exclusively in flood zone 1 (Fig 10) [see attachment WARM20 for figure]. As such it passes the first step of the exclusionary criteria adopted by the Council. There are likewise no local flooding issue designations for the site and no history of drainage problems experienced at the land. There are no barriers to developing the site in this regard.

6.13 Site 8 has been scored 'green' in respect of its likely impact on heritage assets. The below (Fig 11) [see attachment WARM20 for figure] illustrates that the land is situated approximately 800m from the conservation area boundary and St Denys Church (the closest listed building). The site can be developed without affecting these heritage assets.

Landscape

6.14 Site 8 falls within the Cley Hill greensand and chalk terrace (G4) character area in the Wiltshire Landscape Character Assessment (2007) (WLCA). The most significant landscape feature within this area is Cley Hill, a chalk knoll hillfort which provides extensive views over surrounding areas. More generally the landscape character area comprises flat to gently undulating farmland. The field pattern consists of mostly medium sized, generally regular fields, often enclosed by mainly intact hedgerows with hedgerow trees.

6.15 The feature of Norridge Wood to the north west of Warminster is identified as a strong feature. The A36 and A350 which cut through the landscape to the west of Warminster are referenced as disturbing the landscape pattern in the WLCA.

6.16 Views into the site are limited. The land is raised above the A36 which was formed in a cutting. The top of the highway embankment is then marked by significant vegetation in the form of a dense belt of trees in the southern half of the site and more sporadic trees within an established hedgerow to the northern part of the site. The eastern boundary of the site with the Bath Road has a dense belt of trees running the length of the northern part of the site (OM005) sealing off views into this part of the site from the east.

6.17 Parcel 2091 has a hedged boundary with the Bath Road. Some views are possible into the site through established gateways but generally views are relatively limited. Views are of the fields themselves with a number of agricultural buildings in the foreground.

6.18 The only possible views into the wider site would be from the elevated position of the ridge of Cley Hill. The distance between the site and Cley Hill is approximately 3km at this point. Taking into account the distance and the strong intervening tree planting, particularly along the south part of the western boundary, the impact on views from Cley Hill would be extremely limited. It is proposed that the landscape approach which is to be adopted at the WWUE could likewise be taken forward within Site 8.

6.19 The 'Planning for Warminster' document advises that significant landscape mitigation measures will be required and that the western part of the site formerly formed part of the Norridge Wood Ancient Woodlands and that the impact on historic landscape character should be assessed.

6.20 The suggestion is for the existing tree lined buffer to be augmented with additional planting along the length of the western boundary of the fields to provide a denser planted screen. The WWUE proposes woodland structure planting comprising of locally indigenous species to create a strong edge and separation between the town and the countryside. The current proposed allocation could be designed to dovetail with this strategy.

6.21 The introduction of the A36 bypass of Warminster in 1986 led to removal of part of Norridge Wood to facilitate its route. There are small remnants of the woodland which lie outside of Site 8 but the site itself is principally well managed agricultural land (Fig 12) [see attachment WARM20 for figure]. It is not possible to discern without a detailed arboricultural report whether the band of trees highlighted below with blue arrows formed part of the wood. Map regression analysis indicates this could possibly be the case.

6.22 The well treed area at the northern tip of the site appears to have been planted more recently and based on map regression work did not form part of Norridge Wood. Any allocation of Site 8 would need to be 'landscape led'. The mature tree belts would be retained as a feature within the development so it should not be viewed as a ground to not allocate the site.

6.23 Overall the current site is less sensitive in landscape terms than the WWUE which is located in closer proximity to Cley Hill with views across the land. Given that the principle of the WWUE has been found to be acceptable it is argued that Site 8 can likewise be considered acceptable. The land in question forms a logical conclusion to the WWUE being situated as it is between two main roads to the west and east and a small access road to the south. It is adjacent to the WWUE and represents the completion of the infilling of the gap between the bypass and Warminster to the north and west of the settlement.

6.24 The land is situated in between the A36 and the Bath Road. The site offers unparalleled visual and physical containment when compared to competing sites on the fringes of Warminster. The landscape has been affected at this point by the introduction of the A36, the large roundabout, and to a lesser but still noticeable extent by the Bath Road.

6.25 The presence of these roads has limited the parcel of land size to reduce its usefulness for modern agricultural practices. There is clearly no argument to be made with this site that it may set a precedent for further expansion of the town, being contained as it is by the roads. In plan making terms it should be seen as a desirable site which may benefit from the WWUE facilities and enhanced connectivity whilst allowing for the necessary expansion of the town at a site which is not prominent from public view points.

6.26 The Council's assessment scores Site 8 'red' in terms of landscape impact. This is explained as being on the basis that there is a risk of landscape impacts through urban encroachment on the countryside in a location which does not adjoin the settlement boundary. The analysis does however go on to state that 'the site does however adjoin an existing allocation.

Development that is well planned and subject to phasing could be able to overcome these concerns and be appropriate in this location'.

6.27 On the basis of this reasoning a score of 'red' seems unwarranted. Any, and indeed every, site which is coming forward as an option involves an urban encroachment on a countryside location. As has been referenced above the delivery of the site will not come forward in advance of the WWUE which will remove this concern about the site appearing isolated from the settlement.

6.28 The Council are heavily reliant on the WWUE both in terms of ongoing 5 year housing land supply and overall housing trajectory. It is included as part of the committed supply and outline planning permission is in place on the land directly to the south of Site 8. There is no question therefore that the WWUE will happen and the assessment of Site 8 should be re-graded to recognise this.

6.29 Given that the overall assessment of Site 8 identifies that it can be brought forward in a phased way without harm occurring to the landscape the score of 'red' should be revisited and a 'green' should be awarded for the site.

Traffic

6.30 Site 8 has been scored 'amber' for traffic with reference made to the site being 1500m away from a congested corridor. This is presumed to be a reference to the B3414 High Street/Market Place which experiences congestion at peak times.

6.31 The 'Planning for Warminster' document explains that the concern is principally that 'future development growth may increase pressure on east to west routes via Warminster town centre – only two routes currently facilitate this internal movement. This may cause rat running through the residential and rural roads'.

6.32 Site 8 would, in combination with the services and facilities which the WWUE will bring, act to contain traffic movements and limit flows into the centre of Warminster. All out-commuting from the settlement would be undertaken by direct connections to the A36 and A350. Vehicle movements into the centre of the town are likely to be primarily to reach the secondary school and for services and employment in the centre.

6.33 The WWUE will also deliver an enhanced bus service to Kingdown School which Site 8 could both benefit from and support through increased patronage. This along with a half hourly service into the centre of Warminster are secured by S106 legal agreement. The potential impact of further residential development would be somewhat mitigated in this location. Traffic flows into the congested area are unlikely to materially affect the existing situation.

6.34 Development of any of the other candidate sites could potentially result in similar if not higher levels of traffic movements given the poorer connectivity these sites will have. It is recognised that each site is scored 'amber' for traffic, so the scoring system does not say Site 8 is any better or worse in terms of transport impacts than other sites. This notwithstanding, Site 8 has, in our view, a better chance of being more self-contained, given its links to the WWUE and the existing surrounding employment sites, than other candidate sites. In this regard there is a strong argument that Site 8 could score 'green' for traffic.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

8. CONCLUSION AND REQUEST FOR CHANGES THROUGH THE LOCAL PLAN REVIEW CONSULTATION

8.1 The overall housing figure for Wiltshire should be increased to deliver flexibility in the supply of new housing and to avoid the Council losing a 5 year land supply. The Council previously published that throughout this plan period they would plan to maintain a 6 years (+ 5% buffer) housing land supply at all times. The overall housing figure mooted in the ESS would fail to achieve this and should be increased accordingly. The revisions to the plan are not 'positively prepared' or 'justified' having regard to the NPPF (paragraph 35 tests) failing to be aspirational.

8.2 Warminster has under provided for housing over the first 13 years of the plan period with just 39% of houses built over the first 65% of its duration, 498 homes behind where we might expect to be had development proceeded in an even way. The ESS fails to take into account the chronic under-provision of housing within Warminster, instead relying on the overprovision elsewhere in the Trowbridge HMA. The ESS should be seeking proportionate growth in each town.

8.3 Further greenfield land release(s) should be made at Warminster to re-distribute growth more evenly. Currently just 1.8% of the residual requirement for housing in the HMA is shown to be provided at Warminster, despite its size, containment and sustainability credentials. It has proven difficult to identify adequate supply in Trowbridge and part of this growth could be re-distributed to increase surety of supply.

8.4 None of the growth strategies (TR-A, TR-B or TR-C) will meet the required level of need and the ESS should be revised to deliver an ongoing housing land supply of 6 years (+ buffer).

8.5 Warminster currently has a very narrow base of housing land supply which should be widened to ensure that the chronic under-provision which has partially undermined the settlement's role within the county does not continue.

8.6 Context Planning Ltd represent both landowners in the proposed 'Site 8' and we can confirm that the amalgamation of the parcels is accepted by both landowners who would work together in bringing forward any allocation.

8.7 Site 8 and its proximity to the WWUE means that it will be able to both benefit from and support services and facilities in the larger allocation. Bus service improvements to the town and Kingdown Secondary School have been secured by legal agreement in the outline planning permission for the WWUE. The site is superbly located for employment with the nearby industrial estates and benefits from excellent connections to the A350 and A36. There are no heritage or flooding impediments to developing the site, unlike the majority of the alternative sites.

8.8 The sites are relatively well visually contained and will soon be viewed in the context of the WWUE. Existing mature tree lines within the site would be retained in any development layout. A significant landscaping scheme of further structural planting would come forward to reinforce the character of the site. The site is extremely well contained by the Bath Road and the A36 and it represents the opportunity to 'complete' development to the west of the town. Overall, the site is less sensitive in landscape terms than the WWUE.

8.9 Development of the site would be well contained with pedestrian and cycle access to all the facilities required for day-to-day living would be possible. With the development of the WWUE this will become a much less peripheral location. Improved public transport connections to the town will also be made.

8.10 Overall it is considered that Site 8 represents the most sustainable site of the presented options for development and that the option of extending the WWUE to the north is the most appropriate strategy for expanding Warminster. Each of the alternative sites presented for Warminster have significant in principle reasons why they would not be appropriate options as has been outlined.

8.11 There is a well-articulated case that the ESS will not meet the housing need identified for Wiltshire and would leave no flexibility in supply. It is essential that the overall housing target for Wiltshire and the Trowbridge HMA is increased. The chronic under-provision of housing in Warminster needs to be addressed through the allocation of more growth at the town. Site 8 represents the most appropriate location to meet the demand for growth and the Council are respectfully required to amend the ESS to allow for increased growth in Warminster and to allocate Site 8 for residential development in the draft plan.

Rep ID: Warm021	
Consultee code: Landowner	Consultee Organisation (if applicable): Ministry of Defence
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM21
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>1. Background</p> <p>1.1 The Defence Infrastructure Organisation (DIO), on behalf of the Ministry of Defence (MOD) welcomes the opportunity to comment on the Wiltshire Local Plan Review Consultation. The consultation relates to a number of documents including the Emerging Spatial Strategy, Empowering Rural Communities, and Addressing Climate Change and Biodiversity Net Gain through the Local Plan. In addition, a series of settlement specific papers have been published which highlight potential development locations and place shaping priorities. The DIO manages the Defence Estate on behalf of the MOD.</p> <p>The MOD has a number of operational establishments within Wiltshire and has a long and proud history of working with the Community, which is reflected in both local level and county wide liaison meetings, such as the MCI Partnership. Additionally, MOD establishments provide civilian employment and training opportunities and many service personnel and their families choose to settle within the County both during and after their military service.</p>	

1.2 The MOD welcomes the opportunity to work closely with Planning Authorities in the development of policies and strategies within the Development Plan. As recognised in the National Planning Policy Framework, it is important that Planning Authorities consult with the MOD during the preparation of their plans and take into account the need to safeguard operational sites.

I would like to draw your attention to paragraph 95 of the National Planning Policy Framework (February 2019), which states: “Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:… b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”

2. Representations

Spatial Strategy

The MOD is supportive in principle of the preparation of the Wiltshire Local Plan Review Spatial Strategy and is broadly supportive of the Plan’s objectives. However, the MOD has concerns regarding sections of the Plan that would affect the operational abilities of certain MOD sites.

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

2.5 Warminster

2.5.1 Site 1 ‘North Warminster, Land North of Elm hill, Land South of Elm Hill’. The site is owned by the MOD and is part of an operational site. It is not available for disposal and consideration for residential development at this time. Please remove it from further consideration and assessment in the local plan process.

2.5.2 Site 2 Part of the site (SHELAA ref 2075 ‘Land South of the Railway Line’) is owned by the MOD. Further assessment of the site for residential development is supported, subject to there being no access through the MOD estate to the north of the railway line.

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm022	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Aecom
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Wainhomes Severn Valley Lt	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM22a WARM22b
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Warminster</p> <p>Warminster is identified within the existing Core Strategy as a Market Town and is the focus of development within the Warminster Community Area. From a Trowbridge Housing Market Area (HMA) perspective Warminster has an important role to play alongside Bradford-on-Avon, Trowbridge and Westbury.</p> <p>It is clear from delays in the delivery of existing allocations at Trowbridge and as set out in the Wiltshire Local Plan Review: Interim Sustainability Appraisal report that the emerging Local Plan Review is likely to see a reduced housing requirement at Trowbridge and possibly Bradford-on-Avon. Consequently, this will result in a greater amount of development to be re-distributed to Warminster and Westbury as the most sustainable settlement options.</p> <p>It is already the case that delivery within the Trowbridge HMA has been slow and this is the case for the major strategic allocation at Warminster. It is the case that the North and West Wiltshire HMA has consistently been unable to demonstrate a robust 5-year housing land supply, with the latest figures showing this may currently be as low as 4.29 years based on the Council's evidence.</p>	

This suggests that the Council's previous strategy has failed to deliver and this may well have been as a result of making a series of large strategic allocations which by their nature require long lead in times. However, it is also suggested that a greater mix of smaller sites could help boost the land supply situation. With this in mind we would actively encourage a greater mix of allocations sizes as part of the Local Plan Review.

We feel this should provide positive support for the delivery of existing permissions, support smaller growth to the settlement and note there are plenty of opportunities to do so. We also consider it to be advantageous for the Council to consider favourably proposals for applications which make existing permissions work more effectively in terms of residential delivery.

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

WA4. What land do you think is the most appropriate upon which to build?

Land north of Grovelands Way

Wainhomes are in the process of securing a land interest in land to the north of Grovelands Way. The Site benefits from outline planning permission (17/05360/OUT) for the delivery of a retirement community, including the delivery of a proportion of retirement bungalows (C3 use).

The outline planning permission was varied in May 2020 (19/07198/VAR) in order to create a more flexible and implementable planning permission by allowing the proposals to be delivered in stages. The Site is sustainably located relative to the existing centre of Warminster and will be set against the backdrop of the western strategic allocation when that is finally delivered. It is a location where development has already been permitted and is a logical point for Warminster to expand. The proposals

consented include proposals to deal with the Sites most notable constraint, associated with flood risk and the implementation of those works would be essential to the consideration of alternative proposals.
Accordingly, it is a logical location at which proposals which contribute to boosting land supply in the shortmedium term should be considered favourably. Wainhomes plans to bring forward potential further options for the Site which more closely align to other development it is currently in the process of delivering across Wiltshire currently.
Wainhomes would like to proactively work with the Council on proposals and considers that the Grovelands site would offer a logical location in which to allocate land for residential development. We look forward to working with the Council on such proposals.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm023	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Blue Fox Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Hannick Homes Ltd	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM23
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
WA3. Is this the right pool of potential development sites?	

Our representations consider the pool of potential development sites. This is addressed in full within the attached representations.

Planning for Warminster

The Planning for Warminster consultation paper explains that the new strategy proposes a requirement of 2,050 homes for the plan period 2016-2036. This compares to the current strategy as set out in the Wiltshire Core Strategy, to provide for 1,920 homes over the plan period 2006-2026. Taking into account planning completions and commitments, this leaves a further 60 homes to be accommodated up until 2036. This residual figure is based on additional levels of growth at the West Warminster Urban Extension.

The future strategy for Warminster continues to focus on the West Warminster Urban Extension. It is recognised within the Planning for Warminster Paper that the extant allocation has the potential to deliver a higher number of homes than was anticipated by the Wiltshire Core Strategy. It is explained that up to 2026 the allocation is expected to deliver approximately 900 homes and a further 650 homes before the end of the new plan period to 2036.

Within the current Wiltshire Core Strategy (Core Policy 31) the West Warminster Urban extension is identified to provide for 900 dwellings, along 6ha of employment. The Wiltshire Council Strategic Planning Committee (June 2018) resolved to granting outline planning permission, subject to the completion of a S106 Agreement, for the up to 1,000 dwellings along with a local centre, 5.6ha of employment, a primary and part-secondary school, alongside open space, allotments, car parking and changing facilities (LPA Ref: 15/01800/OUT). The subsequent S106 Agreement was confirmed in December 2020.

In granting planning permission this provides the comfort that the specific requirements of the adopted Wiltshire Core Strategy, as set out in Core Policy 31, will be delivered. The grant of planning permission also demonstrates the increased capacity of the urban extension area to accommodate levels of growth above that identified in Core Policy 31. We support the recognition in the Planning for Warminster Paper that this urban extension area, as defined in the Wiltshire Core Strategy, will continue to be the focus of growth at Warminster. In doing so, providing for development in excess of that originally envisaged in the Wiltshire Core Strategy.

The recently consented outline planning application for 1,000 dwellings, incorporates significant areas of the land allocated within the Wiltshire Core Strategy. However, some land parcels remain undeveloped and are not covered by the recent planning permission. This includes further land controlled by Hannick Homes, located at the north eastern extent of the allocated area, to the west of Warminster School, south of Bath Road.

This land currently comprises 15 acres of agricultural within the defined allocated area. This land is well placed to provide a logical development area in the context of the specific allocation requirements set out in the Wiltshire Core Strategy whilst also ensuring that proposals at this location are both consistent and responsive to the disposition of land uses set out in the approved outline planning permission.

Site specific studies and investigations are on-going in order to determine the extent of the developable area. A key consideration relates to matters of flooding, specifically the extent to which Flood Zones and their associated flood risk, represent a constraint to development at this site. This is currently being investigated in order to provide the confidence that an acceptable development scheme can be delivered which does not result in any adverse impacts arising from flooding.

Notwithstanding this, it is considered that the opportunity to provide residential development remains available at this specific location. For the sake of clarity, we wish to express through our representations that this land remains suitable, available and achievable. As a consequence, this justifies the continuation of the defined allocation area through the Local Plan Review process.

Development of this land will also be consistent with the approach set out in the Planning for Warminster Paper as it continues to support the delivery of new homes at the West Warminster Urban Extension area.

The Trowbridge Alternative Development Strategies (ADSs) consultation document explains that the emerging preferred strategy is based on an assumption that current plan allocations remain deliverable and necessary to support the supply of land for housing development.

The recent grant of outline planning permission at this allocation area supports the assumption set out in the ADSs. Therefore, we support this approach and the continued recognition that the strategic allocation at West Warminster remains central to the development strategy for the town.

Given that the additional land controlled by Hannick Homes falls within the defined allocated area, the principle of development at this location remains and this is supported. Additional development at this site will increase the overall capacity of the West Warminster Urban Extension and therefore support the preferred approach for the town as expressed through the current consultation.

As joint developer for the recent outline planning application, Hannick Homes are well placed to ensure that additional proposals for development will support the wider objectives of a comprehensively planned pattern of development at the West Warminster Urban

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered

generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm024	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Walsingham Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Redrow Homes	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM24a, WARM24b
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>WILTSHIRE LOCAL PLAN REVIEW CONSULTATION</p> <p>We write on behalf of our client, Redrow Homes (Redrow), in response to the consultation on the Wiltshire Local Plan Review 2016-2036, specifically in relation to their interests in land at Folly Lane, Warminster.</p> <p>The site comprises a parcel of land to the west of Warminster and the east of the A36 and forms part of the West Warminster Urban Extension (WWUE) Strategic Allocation in the currently adopted Wiltshire Core Strategy 2006-2026. It also benefits from an endorsed Masterplan for residential and associated POS (LPA Ref: 16/01323/MAS).</p> <p>Background</p> <p>The Wiltshire Core Strategy (WCS) was adopted in January 2015 and covers the period up to 2026. The WCS commits to the delivery of a minimum of 42,000 new homes by 2026, it does not set a ceiling on the overall number of houses to be delivered. As part of this commitment, the WCS seeks to deliver approximately 2,060 new homes within the Warminster Community Area,</p>	

with at least 1,920 to be delivered at Warminster. Core Policies 2 and 31 allocate land at West of Warminster for a mixed-use development to include 6ha of employment land and 900 dwellings, over the Plan period up to 2026.

In accordance with the requirements of Core Policy 2, a masterplan was prepared by Persimmon Homes Ltd, Hannick Homes and Developments Ltd and Redrow Homes Ltd. The masterplan was modelled on delivering 1550 dwellings and 6 hectares of employment land over a period up to 2032/33.

The masterplan was endorsed at a Strategic Planning Committee meeting on the 15th June 2016 and is a material consideration in subsequent planning decisions.

The Endorsed Masterplan was modelled on a housing capacity of 1,550 homes. The table below summarises planning consents and applications in the WWUE masterplan area up to the present day: [see attachment WARM24a for table]

Planning for Warminster

As outlined in the table above, to date there have been planning applications, consented or pending, for a total of 1,475 homes.

As such there is a residual capacity of 75 dwellings remaining based upon the proposals modelled in the Endorsed Masterplan.

As stated at paragraph 9 of the Planning for Warminster document currently under consultation, the new strategy proposed by the Local Plan Review requires the provision of 2,050 homes in and around Warminster for the period 2016-2036.

Redrow are in agreement with the Council's assessment at paragraph 11 of the Planning for Warminster document which states the following:

"The Warminster West Urban Extension is the most significant developable commitment at the town. The planning application process has identified a capability to deliver a higher number of homes than was anticipated by the Wiltshire Core Strategy. In line with the Wiltshire Core Strategy allocation, the urban extension is to deliver approximately 900 homes prior to 2026. A remainder of approximately 650 additional homes is to be delivered up to 2036. As illustrated by the diagram above, this equates to a significant number of homes that are already planned for at Warminster."

The document states that homes already built and those already in the pipeline can be deducted from this total requirement of 2,050. The Council have indicated that a total of 1,989 dwellings have already been delivered since 2016 or are in the pipeline. It is unclear whether the Council have included all of the WWUE capacity within this number. Footnote 1 goes further to define homes in the 'pipeline', but does not specify that homes within the confirmed WWUE capacity of 1,550 have been included in the number deducted from the total requirement. We would suggest that this clarified in the next stage of plan making by included an amended footnote as follows:

1In Warminster 173 dwellings have been built between 2016-2019 and, at 1 April 2019, 1,816 homes are already in the pipeline (i.e. they have planning permission, resolution to grant planning permission, are allocated in the Core Strategy under Policy CS31 or in the Wiltshire Housing Site Allocations Plan). (our amend)

As the WWUE is still to be fully delivered and the Council have confirmed it has the capacity for 1,550 dwellings, Redrow also consider that the WWUE should be re-allocated within the final Local Plan Review and any related policy should confirm the capacity as set out by the endorsed masterplan.

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

WA4. What land do you think is the most appropriate upon which to build?

Land at Folly Lane

By our assessment the remaining residual capacity in the WWUE allocation would deliver 75 dwellings towards the requirement of 2,050 homes set out in the consultation document. The Land at Folly Farm (as outline red in Appendix 1) forms part of the WWUE allocation and is identified in the Endorsed Masterplan for residential development with an area identified as Landscape Buffer / Semi-Natural Green Space / Ecology Parks on the western boundary. The site is outlined in red on an extract from the masterplan below: [see attachment WARM24a for masterplan]

Redrow have carried out initial technical work to inform an initial layout. The initial layout has demonstrated that the site can achieve a suitable layout that provides up to 55 dwellings, whilst incorporating the landscape buffer to the west. They anticipate submitting the proposals for pre-application consultation this month with a full planning application to follow in due course. We trust that the information above is of assistance to Policy Officers in confirming that the site is, available, achievable and suitable for development pursuant to the endorsed WWUE masterplan and in confirming the capacity of the site, subject to planning approval.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm025

Consultee code: Statutory Body

Consultee Organisation (if applicable): Natural England

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WARM25

WA1. What do you think to the scale of growth? Should there be a brownfield target?

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

Comments on Principle Settlements and Market town site selection reports

General comments on final proposed sites for assessment

During the site appraisal stage and before selecting which sites to take forward as allocations in the plan, the following may be useful to ensure opportunities for biodiversity net gain are secured:

- Does the site present significant risks to biodiversity? If so, have alternative sites with lesser impacts been explored?
- What site specific recommendations can help delivery biodiversity net gain, for example what further survey work may be required at the planning application stage?
- Whether the site can accommodate on-site biodiversity net gain provision or whether there is a need for off-site contributions?

What types of habitat creation or enhancement are most appropriate?

- Does there need to be any restrictions on the type of development that will be acceptable or particular parts of the site that should be not be developed?

During the site selection process, potential sites should be judged in accordance with all policies in the NPPF, including selecting land with the least environmental value, where consistent with other policies. The Biodiversity Metric can be useful during this process to understand the opportunities on a site, test indicative biodiversity net gains and to ensure sites of high biodiversity value are not selected.

Natural England encourages developers, promoting sites for inclusion in the plan to use its Discretionary Advice Service, to discuss opportunities for biodiversity net gains on individual sites. This helps to ensure evidence is provided and appropriate ways to deliver biodiversity net gain can be included in site allocations if they progress. This can also help speed up the planning application stage. Further details on Natural England's Discretionary Advice Service is provided here.

Protected Landscapes – general comments

All development allocations, including those within settlements, should carefully consider impacts on the landscape and scenic beauty of the Protected Landscape (PL), including cumulative impacts and impacts on the settings of PL to ensure the highest status of protection is given to the PL, in line with NPPF para 172. We request that a Landscape and Visual Impact Assessment (LVIA) is carried out for allocations, particularly those outside of existing settlement boundaries, to assess the impacts on the character of the landscape and the visual impacts. Whilst such a LVIA would not be as detailed as one for a planning application, sufficient information e.g. on visual baseline, number of dwellings and key viewpoints are required to inform our advice.

Allocations within the existing built up area may also benefit from a LVIA e.g. where extensive green spaces contribute to the character of the settlement, particularly when viewed from high points in an AONB and such views are recognised as one of the special qualities of the PL.

All development within PLs or their settings should:

- respect and enhance local landscape character;
- be of the highest design quality;

- include appropriate green infrastructure;
- incorporate appropriate enhancement measures e.g. landscape enhancement or access improvements, in line with the relevant NP/AONB Management Plan or local landscape character assessment. Biodiversity net gain should also be delivered (in line with a local plan policy/other local strategy).

Planning for Warminster

Site 9 (SHELAA reference 3676) encroach in the rural landscape and appears to impact on ecological connectivity in the locality. Further assessment required to determine impacts on mobile species and overall biodiversity impact.

All proposed allocation fall within the zone of influence for the Salisbury Plain SPA strategic solution.

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm026	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pegasus Group
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Barratt Homes Bristol	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM26
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>An executive summary of the key points within these representations are provided below:</p> <p>Housing Requirement</p> <ul style="list-style-type: none"> • Whilst we support a higher housing requirement, there are concerns that the LHNA is based on evidence which is too old to have captured recent market signals, particularly in respect of employment data. This evidence base should be revisited and refreshed to ensure the Council is planning appropriately for the development needs of the county; • The proposed plan period needs to be extended to ensure compliance with the NPPF. This would require an extension to 2038 as a minimum; however, we would advocate for an extension to 2040 to provide an additional contingency in case of delays; • There does not appear to have been any consideration to uplift the housing requirement on the basis of meeting affordable housing needs. Indeed, the evidence suggests this would be something worth exploring at least and a modest increase to the housing requirement could ensure that all affordable housing needs are met effectively. <p>The Spatial Strategy</p>	

- Given the deficiencies of the Core Strategy in achieving several of its key aims, it is concerning that the Council have assumed rolling forward its development distribution is a sound approach. Rising affordability issues, increased levels of out-commuting and the need for a radical response to the climate emergency requires at least a consideration of an alternative approach to distribution between the HMAs to be considered, even if this is ultimately to be discounted.
- Neighbourhood Plans will, no doubt, have a role to play; however, the plan needs to clearly define this, including the development needs to be planned for within NHPs. Care also needs to be taken to ensure that deferring decisions to NHPs will not adversely affect the delivery of housing.
- Whilst maximising the potential for delivery on brownfield sites is supported, it is difficult to see what the benefit of identifying brownfield targets is in realising this. A conservative windfall allowance coupled with the identification of large brownfield sites at allocations will ensure a reliable estimate can be built into projections, without having a potentially adverse impact on housing land supply.

Trowbridge Housing Market Area

- Trowbridge's role as a principal settlement within Wiltshire means that it should be a focus for continued growth. However, existing commitments and constraints around the majority of the town means that development at Hilperton is the only logical location for further growth over the plan period.
- Our concerns with the evidence base on which the housing requirement has been disaggregated notwithstanding, a reduced requirement over the plan period for Trowbridge makes sense given potential deliverability issues.
- The identification of land for development to deliver housing beyond the end of the plan period is supported on the basis that there is an opportunity at least to deliver more housing in the plan period.
- However, uncertainty around delivery on the Ashton Park allocation coupled with the short plan period means that delivering the identified housing requirement in the plan period may not be feasible. This may need to be mitigated through additional site allocations at Trowbridge or elsewhere within the HMA (e.g. Warminster).

Addressing Climate Change and Biodiversity Net Gain

- We are supportive of measures to reduce carbon emissions and improve biodiversity within the county. Any development management policies will need to take account of any emerging legislation or policies at a national level.
- The de-carbonisation of transport will be important in reducing emissions and there is no justification for a more dispersed approach to development as a result. However, analysis has shown that self-containment has deteriorated within the county with increased levels of out-commuting to locations such as Bath, Bristol and Swindon, the majority of which is done by car.
- Improving the self-containment of the county's principal settlements and market towns should still be a focus of the plan; however, the failures of the Core Strategy means that the approach to achieve this needs some further consideration.

Planning for Warminster

- It is not clear why higher levels of growth were not considered at Warminster, other than a desire for a period of consolidation as the WWUE comes forward. The decision to simply roll forward the Core Strategy requirement is not a reflection of the settlement's actual capacity to accommodate growth beyond that which has already been committed.
- In any event, simply extending the plan period to 2038 as a minimum would uplift the requirement at Warminster sufficiently to require the release of greenfield land to meet its development needs. Affordability issues have been exacerbated by the failure to deliver the WWUE in a timely manner and there is a concern that delivery rates will not be high enough to effectively address this. A more ambitious housing requirement would support the delivery of affordable housing and help to reverse this trend.
- Further growth could also be justified in the context of a concerted effort to improve the settlement's self-containment. If the ambitions of the Core Strategy on this matter are to be realised, it must be accepted that sustainable development, that grows the working-age population and creates the commercial scale necessary for business investment and employment is critical. A greater scale of growth could be justified on the basis that it would deliver the critical mass required to attract inward investment to better balance the jobs to resident workers ratio whilst securing additional facilities which would, in turn, improve self-containment and deliver on the wider environmental and economic goals of the plan.

Land off Westbury Road, Warminster

- Assuming that greenfield sites are required to meet an uplifted housing requirement at Warminster, then Barratt Homes' site off Westbury Road would be an excellent candidate.
- Barratt Homes envisage the next natural extension to the settlement to be along the corridor between Westbury Road and the railway line. Barratt Homes control land that would be capable of delivering a significant urban extension to the town with a range of supporting uses alongside housing. However, given that the residual housing requirement for Warminster over the next period will be significantly less than this figure, a smaller 'first phase' for around 200 dwellings is being promoted for allocation within the emerging Local Plan.
- The site has been subject to a comprehensive suite of technical work which has informed an indicative masterplan for the site's development and shows how the identified constraints can be overcome.
- The site is sustainably located, available and suitable for development. It is backed by a reputable housebuilder and would be capable of coming forward within five years of permission being granted. It is the logical option for further growth at Warminster, should a need for greenfield sites be identified.
- Barratt Homes would be committed to bringing the site forward promptly for development and would support the local plan process by submitting an early planning application. This would allow permission to be granted swiftly and housing delivered in the early years of the plan period.

6. PLANNING FOR WARMINSTER

Scale of Growth

6.1 We note that the intention is to simply roll forward the Core Strategy requirement for Warminster which would require the town to accommodate 2,050 new homes for the plan period (just over 100 dwellings per year). Of this requirement, the majority of this has effectively been committed through the WWUE and supporting site allocations from the Site Allocations Plan. This leaves a residual requirement of around 60 dwellings. Given that the proposed brownfield target for Warminster is 130 dwellings between 2021 and 2031, it is assumed that this residual requirement could be delivered without the need to look at additional greenfield sites.

6.2 Notwithstanding our concerns with the robustness of the evidence base on which the housing requirement has been identified and distributed between the HMAs, there are a handful of obvious reasons why a higher quantum of development should be identified at Warminster specifically.

6.3 The first is the extended plan period to ensure compliance with paragraph 22 of the NPPF. As a minimum the plan period should extend to 2038 if not a little after this to factor in any delays to the plan's preparation (hence why we suggest extending it to 2040). This would require 2-4 additional years to be planned for and would uplift the housing requirement at Warminster by 200-400 dwellings.

6.4 This alone would necessitate the release of additional greenfield land at the settlement to meet housing needs. However, as we have also identified above, there are also affordability issues at Warminster which need to be addressed, having been exacerbated by the failure to deliver the WWUE in a timely manner. Again, this would support the delivery of additional housing to ensure that housing needs are being met. The evidence would need to be reviewed; however, a modest uplift to the housing requirement could go a long way to combating affordability issues within the town.

6.5 Finally, a more holistic approach to development at the settlement needs to be considered. The uplifting in the WWUE has effectively predetermined the location and nature of growth up to 2036. However, this was done through the development management process, rather than a holistic review that would be done through the Local Plan Review. The implications of this additional growth need to be considered in the round, not simply in terms of how it affects the need to deliver housing over the extended plan period.

6.6 As we have set out above, the failure to reverse the growing wave of outcommuting from Wiltshire is indicative of an area that has fallen behind its neighbours in development and economic development terms. The data demonstrates that the area has not been able to provide attractive enough business and employment locations to compete with those at its boundaries such as Bath, Swindon, Bristol and Andover. With the exception of Salisbury, its towns have not been developed to a sufficient scale to attract significant businesses and inward investment, despite individual visions for the market towns to achieve precisely this, being set out many years ago for the current WCS.

6.7 This lack of commercial scale today is essentially acknowledged in the town profiles prepared by Wiltshire County Council in 2017 as part of the Local Plan review. Trowbridge and Warminster are identified as key employment and administrative centres

whose roles should be strengthened. The Warminster Profile acknowledges the Vision for the town in the WCS, indicating that an increase in future housing in Warminster is needed to "facilitate the delivery of improved services and facilities in the town."

6.8 The town profiles also highlight the lack of local workplace employment growth in these towns, which immediately demonstrates the challenge of achieving the Visions set out for them. This is further evidence of how Wiltshire's growing workforce is not being employed locally in these towns.

6.9 This should not be interpreted as an indication that these towns are inappropriate development locations. Indeed, the WCS is clear in recognising that the county's Market Towns have "potential for significant development that will increase the jobs and homes in each town in order to help sustain... services and facilities and promote better levels of self-containment and viable sustainable communities."

6.10 If the stated Visions for Wiltshire's towns are to be realised, it must be accepted that sustainable development, that grows the working-age population and creates the commercial scale necessary for business investment and employment is critical. As is the identification of employment land to provide local employment, accepting that said commercial scale will need to be achieved before demand for employment space materialises. In the meantime, given the level of out-commuting that currently exists, it will be equally critical to ensure residential development is located within sustainable transport corridors that offer fast connections to the region's employment centres such as Salisbury, Bath and Swindon.

6.11 Again, a greater scale of growth could be justified on the basis that it would deliver the critical mass required to attract inward investment to better balance the jobs to resident workers ratio whilst securing additional facilities which would, in turn, improve self-containment and deliver on the wider environmental and economic goals of the plan.

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

Potential Development Sites

6.12 We note the sites that have been identified for potential development and welcome the inclusion of our client's land (site 9) as a site to be taken forward for consideration.

6.13 Whilst a detailed assessment of each site is yet to be undertaken, we would make some general observations about the identified sites based on our own review of potential development options around Warminster.

6.14 Site 1 – It is understood that the site comprises part of the MOD barracks which remain active/operational. We note that the land is also comprised of playing pitches and facilities which may not be suitable for development. Furthermore, significant development in this location may lead to increased traffic through the town centre as development attempts to reach the A36/A350, thus exacerbating air quality issues in the area.

6.15 Site 2 – This site was originally proposed in the Housing Site Allocations Plan (HSAP) for 100 dwellings but was rejected by the Inspector on heritage grounds.

There are less sensitive sites in heritage terms to this one and so this should not be a preferred location for development.

6.16 Site 3 – There are flood risk, sewage and heritage related constraints in this area, albeit we acknowledge this small site may be capable of being delivered without significant adverse impacts. However, it would only make a limited contribution to housing supply even if it were to be found sound.

6.17 Site 4 – Notwithstanding the ecology and air quality constraints, we also understand that land in this area is under disparate ownerships and so the

deliverability of this site is unclear. It is also further removed from the Town Centre and railway station which reduces the attractiveness of using active/public modes of transport to access a wide range of services and facilities.

6.18 Sites 5, 6 and 7 – All sites have limited capacity to deliver housing due to their size and constraints.

6.19 Site 8 – The site is constrained for much the same reasons as Sites 5, 6 and 7; however, we also understand this area to be in relatively disparate ownership and home to a handful of existing properties. As such, the scope for development in this location is considered to be limited.

6.20 Site 9 – Site 9 is our client's site and we elaborate on its constraints and deliverability in the following section.

WA4. What land do you think is the most appropriate upon which to build?

7. LAND OFF WESTBURY ROAD, WARMINSTER

7.1 Barratt Homes control around 36ha, split across three parcels of land either side of Westbury Road, Warminster. These areas are labelled on the below figure. [see attachment WARM26 for figure].

7.2 Barratt Homes see land in this part of Warminster as the next logical location for growth. The long-term ambition is to deliver a sustainable urban extension with a mix of uses alongside significant levels of housing. It should be noted that land in Parcel 2 is not proposed for development, which has been exclusively reserved to deliver open space and BNG.

7.3 However, Barratt Homes are also mindful of the level of growth that has been committed to Warminster in recent years, albeit noting that much of this is yet to be built out. As such, Barratt Homes are only promoting the site for an allocation of around 200 dwellings in the Local Plan Review. The need to extend the plan period by at least two (and ideally four) years will uplift the residual requirement by between 200-400 dwellings. When one applies a buffer to this figure and discounts delivery from windfall sites within the settlement boundary, it is expected that there will be a need to identify some greenfield sites to deliver the housing requirement for the settlement. Development on Barratt Homes' site for around 200 dwellings would, therefore, meet this residual need.

7.4 Greater scales of development could be delivered as well, especially if this is justified by a review of the evidence base or an ambition to seriously address outcommuting and/or affordability issues within the town. However, this can be explored as the plan progresses, or deferred to subsequent rounds of plan making as necessary.

Deliverability

7.5 The Technical Delivery Document summarises the technical work undertaken to date and explains how this has informed the concept plan for the site. This has been appended to these representations for reference. Please note that this was based on delivering around 450 dwellings, not the 200 dwellings being proposed for allocation in this plan.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm027

Consultee code: Statutory Body

Consultee Organisation (if applicable): Environment Agency

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WARM27

WA1. What do you think to the scale of growth? Should there be a brownfield target?

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

Pollution Prevention

Adopted Core Policy 69 details measures required to protect the Hampshire Avon SAC from nutrient pollution. It will be necessary to update this policy to reflect the most recent agreement made between Wiltshire Council, the Environment Agency and Natural England.

Warminster

Part of Site 9 is within SPZ 1 for Arn Hill Boreholes. Ideally this site should be removed for pollution prevention reasons (as explained above).

Sites 5-8 are within SPZ 2-3. Measures should be taken to reduce the risk of contamination of Warminster Malting Public Water Supply boreholes. Could these developments be located outside these zones?

Amesbury, Salisbury, Warminster, Devizes

These areas are within the Hampshire Avon catchment which is currently failing protected area and WFD objectives because of elevated phosphorus. Increased phosphorus levels that may reach the Hampshire Avon as a result of the development should be offset in line with the Environment Agency and Natural England Hampshire Avon Nutrient Management Plan, Memorandum of Understanding and Local Authorities Supplementary Planning documents and other relevant documents/agreements.

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm028	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Historic England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below: WARM28
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Historic England considers that the historic form and character of a historic settlement within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant or underused buildings of historic or architectural interest to help reinforce the character of the town and in turn limit sprawl. An ambitious target is encouraged although the related future capacity (amount of development) must relate to the context of the site(s) and the future form should ensure a good fit with the townscape. Historic England has prepared advice on optimising housing density within historic places which may be helpful.</p> <p>https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/</p>	
WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

Conservation Area Appraisal's and Management Plan's for the town and Bishopstrow, and a Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).

WA3. Is this the right pool of potential development sites?

Conservation Appraisal's and a strategic setting assessment will be important evidence to inform a site's suitability. Disclaimer – Historic England have not undertaken a detailed assessment of the suggested sites in and around the town due to the additional evidence proposed to be gathered. We therefore respectfully reserve judgement on their suitability.

WA4. What land do you think is the most appropriate upon which to build?

Wiltshire council acknowledge that further assessment and consideration of the historic environment is essential to determine whether or not the principle of certain sites is acceptable and if so the form they may take. At present without such evidence in the public domain, Historic England is unable to take a view on whether the Local Plan has been prepared in accordance with legislation, national policy, guidance and advice for the historic environment. Our judgement on such matters will consequently need to be deferred.

Wiltshire Council explored several potential sites during the preparation of the recent Wiltshire Housing Allocations Plan's (2020). No doubt this experience can inform the current plan making process.

Historic England's position on Site 2 East of Deane is illustrated by our previous statement provided for the Planning Inspectorate's Examination of the aforementioned Housing Allocations Plan. <https://www.wiltshire.gov.uk/article/2353/Wiltshire-Housing-Sites-DPD-Examination>

This current consultation suggests a much larger site that may well exaggerate the impact and degree of harm.

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities. Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.

WA6. Are there any issues or infrastructure requirements that should be identified?

We note that the historic environment/heritage assets is an important component part of Wiltshire's infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.

Further comments

It will be important to demonstrate, perhaps in a discrete heritage topic paper, how proposals will have considered and responded to the historic environment, the town's history, character and, in particular, it's landscape setting and surrounding heritage assets. Warminster and Bishopstrow do not appear to have a Conservation Area Appraisal and Management Plan but perhaps more importantly is the apparent absence of a setting assessment to inform considerable potential edge of town expansion.

Rep ID: Warm029

Consultee code: Statutory Body

Consultee Organisation (if applicable): Highways England

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WARM29

WA1. What do you think to the scale of growth? Should there be a brownfield target?

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

Warminster

In the Trowbridge HMA, Warminster is identified as a Market Town. The A36 bypasses Warminster and currently forms a boundary to the built-up area. Two of potential development sites identified for Warminster about the A36. In the review of Site 4: Land at Warminster Common and Land south of Wren Close, Warminster, the issue of noise and air quality arising from proximity to the A36 is recognised. We will seek a suitable buffer between the road and any new development. In the review of Site 8: Land at Brick Hill and Land between Bath Road and A36, noise and air quality are not mentioned, but as with Site 4, the issues equally apply. Further consideration will also need to be given to any other impacts on the integrity of the infrastructure asset including drainage and landscape.

Overall, the Warminster Market Town document recognises that potential impacts on the A36 will need to be assessed. There is no specific reference to impacts on the A36 at Warminster in the Transport Review report, hence we would encourage the transport review work to include an assessment of the A36 at Warminster.

It is assumed that both sites would be accessed off the local road network, not the A36. Highways England would welcome clarification of this within the emerging strategy.

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm030	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Cranborne Chase AONB
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WARM30
WA1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>37. It appears that the existing allocations, on the West of Warminster within the bypass, substantially cover the requirements to 2036 without the addition of a significant number of extra sites. Nevertheless, these allocations are within the setting of this AONB. The principles of the agreed significant strategic landscape planting of large trees to protect the setting of the AONB, to soften and screen views of the development from Cley Hill and Little Cley, and to both 'green' and create on site character and quality should be reaffirmed in the Plan. The western extensions envelope three public Rights of Way which provide access to the wider across the A36 bypass. However, two of those crossings are at road level, which appear to provide significant safety risks to the new inhabitants seeking access to the countryside further west. This AONB Partnership recommends that safer, and improved, access to the countryside in the form of a bridge over the A36 should be included in future plans.</p> <p>38. The allocations amount to around 2000 dwellings plus about 6ha of educational and employment land. That number of people in close proximity to this AONB will inevitably increase the recreational pressures on this AONB, particularly the access land and</p>	

public Rights of Way. This AONB Partnership does, therefore, recommend that, owing to the proximity to this AONB and the additional pressures on the natural beauty, each new dwelling makes a financial contribution to the management of this AONB. 39. In addition, 105 'residual' dwellings are proposed for 4 AONB large villages in the Warminster area. That will increase the pressures on this AONB, and those developments should contribute to sustaining the character and qualities of the landscapes that make this AONB so attractive to people.

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Warm031

Consultee code: Other

Consultee Organisation (if applicable): Railfuture

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WARM31

WA1. What do you think to the scale of growth? Should there be a brownfield target?

WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WA3. Is this the right pool of potential development sites?

WA4. What land do you think is the most appropriate upon which to build?

WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WA6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Planning for Warminster

We support extension of TransWilts services to Salisbury and Southampton. The railway station has a sizeable rural catchment area to its south and there is a case for improving connectivity between train and bus services.