

PL/2026/00195 Land to the West of Westbury Road, Warminster. Housing density, rural development and overdevelopment

Objection:

The application is for 205 houses. This exceeds the number that the council's own officer recommendation of a maximum of 184 houses. Further the application is out of keeping with the neighbourhood thereby breaching NPPF 129 (d). It should be rejected on these grounds.

However in addition the site is in a demonstrably rural setting. It does not comply with any of the exceptions which are required to build in a rural setting. Contrary to the applicants statement, this was **NOT** discussed or concluded upon during the Planning Inquiry.

What was discussed was the landscape setting, which it was agreed gave rise to some modest harm. However that is a completely different issue to the principle of developing a rural site in the first place.

Finally this is a rural site and the applicant's plans do not comply with NPPF 82 and should therefore be rejected.

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1. Overdevelopment

This planning application is for 205 houses. The last application on this site, whilst a different application, was also for 205 houses on the same land area. The observation of the Council's Urban Design Officer was that the indicative plan only demonstrated that 184 dwellings could be accommodated on the site.

The current application is different from the previous application in one significant aspect. In order to keep the same number of houses but to keep them out of flood zones 1 and 2, the housing has been compacted into an even smaller area of land.

Given the observation of the Urban Design Officer on the previous application, we should expect that, if anything, the current area planned for housing, being smaller, would accommodate even fewer houses.

The applicant has attempted to skate around this objection by saying that the application is for "up to" 205 houses.

This is, frankly, nonsense. Read the applicants own planning statement and it is abundantly clear that the applicant has no intention of building any fewer than 205 houses. All the calculations they have made are predicated on them building 205 houses.

This is overdevelopment, and the applicant is well aware of this.

They will tell you that the overdevelopment issue can be saved for the "reserved matters" application.

This would be a waste of everybody's time.

You and the planners (and we suspect the applicant) will be well aware that overdevelopment of a site is something that can be considered at outline planning. It frequently is considered at this stage and it has certainly been used as grounds for refusing an application elsewhere.

Examples include:

Land North East of Mickleton Gloucestershire GL55 6UF (10 September 2025)

Land Off Longsight Road, Langho Bounded By Railway, Northcote Park and Wildmans Farm (26 June 2025)

Land at (SO 8244 5124) Old Malvern Road Powick (11 October 2024)

I respectfully suggest that this is overdevelopment and that is sufficient grounds to turn the application down on.

2. Density of development

Whilst the applicant may argue that some Local Plan policies are out of date by virtue of a lack of a five year land supply, it remains a fact that NPPF must be followed and used to assess harms or benefits in the tilted balance.

In that respect we have to consider the provisions of NPPF 129 which requires planning policies **and decisions** should support development that makes efficient use of land, taking into account:

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change;

Clearly this is a greenfield site and hence there is no regeneration involved.

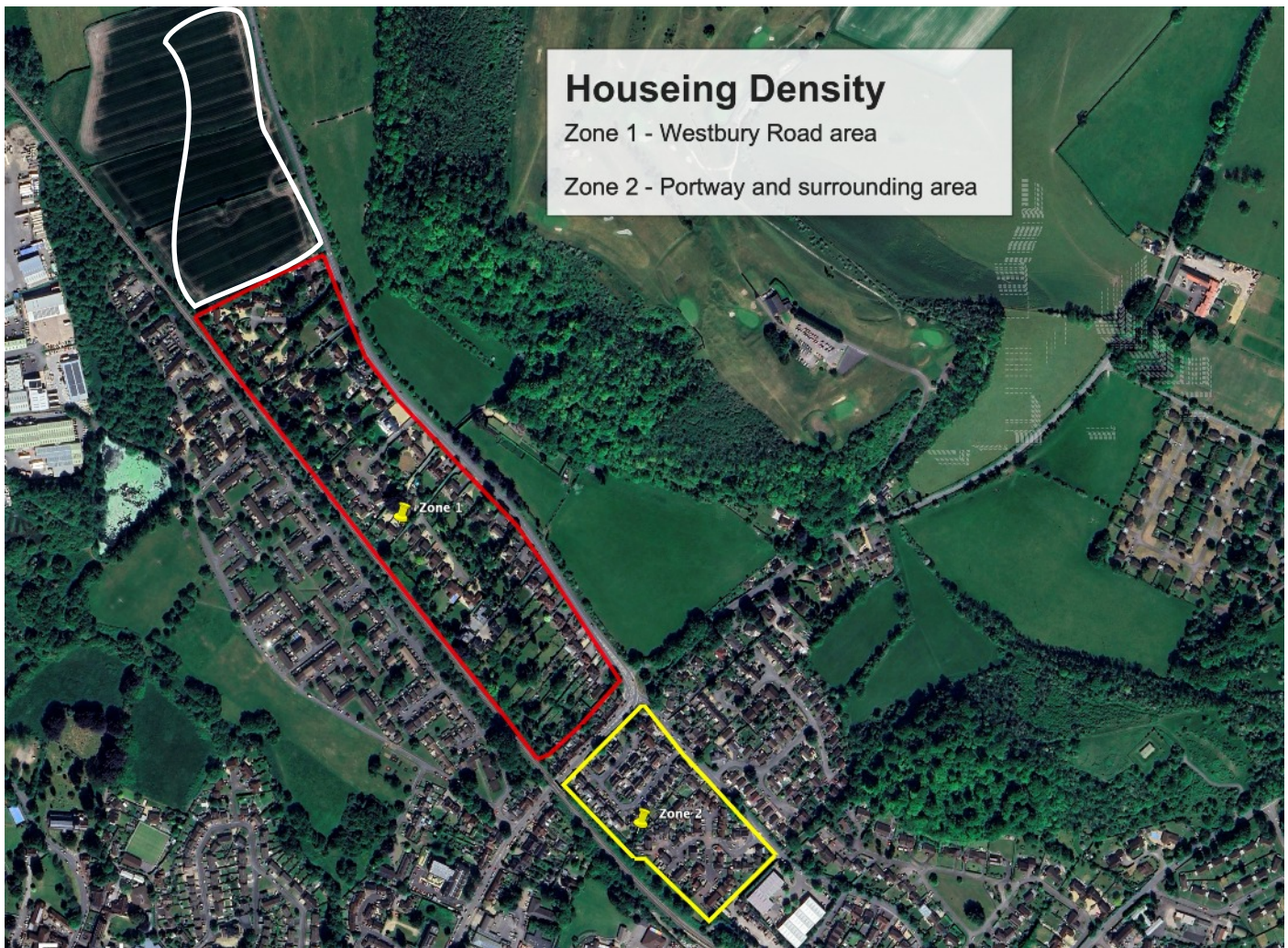
However the new development will be a significant departure from the housing density along Westbury Road. This is both in terms of the density of housing and the proposed garden sizes in the indicative layout.

The total site is 10.45 hectares while the actual housing will be pushed into approximately 6 hectares. That leaves 205 houses spread around 6 hectares of land or 34 houses per hectare including gardens. It is usually accepted that a density of 25-50 houses per hectare is "medium density".

The Northern suburb of Warminster along the Westbury Road is rigidly defined with the railway line forming a hard boundary to the west. East of that hard boundary is a distinct and traditional pattern of suburban development.

As you move from the town centre to the edge of the settlement boundary, just beyond The Woodlands, housing density declines.

For simplicity's sake we have divided up the suburb east of the railway line into 2 zones and calculated the housing density per hectare in each zone. They are shown on the map on p3 along with an outline in white of the applicant's site where the houses proposed would be delivered.



The area between Portway and the railway station, the closest part of the suburb to the town centre averages 33 dwellings per hectare (see map on p3 Zone 2).

As you cross over to Westbury Road from Portway, the average density of housing along the Westbury Road averages 7.88 dwellings per hectare (Map on p3 Zone 1). As you see a notable decline. Densities of development below 25 dwellings per hectare are usually considered to be low density.

Take another look at the map. In Zone 2 (outlined in yellow) there are 99 houses. Compare the size of zone 2, with the built envelope on the applicants site outlined in white. Now bear in mind that the area outlined in white is meant to fit in 205 houses!

The applicant's development would not only take the density of development from low density to medium density, it will do so at the Gateway to the town.

This is unacceptable. It is a clear breach of NPPF 129 (d).

In addition it is all of the following:

- “out of keeping with the street scene”
- completely out of place
- unsympathetic to the surrounding built environment
- unsympathetic to the line of development heading north from Warminster town centre
- will significantly detract from the overall look of the area

- Unsympathetic to the local character and history of the town
- Detracts from a sense of place

By contrast, the pattern of development along the Victoria Road from the town centre to the edge of the West Warminster Urban Extension is very different. Here the line of development to the west shows no discernable tailing off. The density of development is consistent and even.

In summary the applicant proposes something that will leave an overdeveloped site and an unappealing and unattractive presentation of the town which will be the first thing visitor's to the town see.

3. Rural area

The applicant's site is demonstrably rural. Three fields most recently planted to wheat and cereal crops. The only housing currently in the area is the farm house (New Farm) on the east side of Westbury Road opposite the north east corner of the applicant's site.

You can look at planning policy any way you wish, you can decide the settlement boundary is out of date. But it is an undisputable fact that this is a rural landscape.

Contrary to the applicant's various statements that the Planning Inquiry agreed everything



except flooding, the issue of the site being a rural location was neither discussed nor concluded upon.

To build 205 houses on a rural site breaks the conditions set by NPPF 82 which states: *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community-led development for housing. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.”*

I will take a look at the need for market rate housing in a separate paper. For these purposes it is sufficient to note that the applicant has put forward plans to offer just 61 Affordable Houses.

The applicant puts great store by offering 30% “Affordable Housing” and wants you to assign significant benefit to the fact. However there are a number of factors you should consider:

- a) Under current Wiltshire Council policy, 30% is the minimum acceptable Affordable Housing provision. So, far from being a generous offer, the applicant is actually offering the minimum number of Affordable Houses they can get away with.
- b) NPPF 82 actually requires that in sites such as these, Affordable Housing should be the majority and market rate housing should only be allowed to facilitate the building of Affordable Housing. In short, the applicant should be offering around 70% Affordable Houses with 30% at market rate to make enough profit to allow for the building of Affordable Houses.

Because the applicant’s plans breach NPPF 82, this application should be dismissed.