

UK Government's prioritising of a 'brownfield first' approach to house building: developing brownfield, disused and under-utilised sites.

Objection:

The Government is prioritising a 'brownfield first' approach to boost house building by encouraging development on previously developed land. This application is on existing agricultural land (the 'green buffer') and outside the Warminster settlement boundary. There exists substantial brownfield sites for potential development within the settlement boundary which could easily meet the target housing number for Warminster identified in the evolving Neighbourhood Plan (some 90 dwellings).¹

This application fails to meet the government's 'brownfield first' approach and prioritisation.

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The 'Brownfield first' approach.

The UK government is prioritising a "brownfield first" approach to boost housing, targeting 1.5 million new homes by encouraging development on previously used land. Key strategies include implementing "brownfield passports" for faster planning; utilizing the £68 million Brownfield Land Release Fund to unlock sites; and updating the National Planning Policy Framework (NPPF) to favour redevelopment.

Key Aspects of the Government's approach include:

- **Brownfield Passports:** The government is introducing "brownfield passports" to fast-track approval for development on suitable urban sites. This system aims to create a presumption in favour of development, making it easier to secure planning permission on brownfield land.
- **Planning Reform:** The NPPF is being updated to ensure that brownfield development is accepted in principle.
- **Funding and Support:** The Brownfield Land Release Fund (BLRF) provides grants to local councils for site remediation, decontamination, and infrastructure improvement, such as upgrading water and internet access.
- **Targeted Development:** The approach focuses on urban areas, derelict land, and under-utilised sites like car parks to reduce urban sprawl and protect green spaces.

¹ See the Neighbourhood Plan (<https://warminsterplan.com>)

- Increased Certainty: A call for evidence on the "brownfield passport" and other initiatives aims to reduce the risk, cost, and uncertainty for developers, promoting faster project delivery.
- This strategy aims to drive economic growth while transforming neglected spaces into vibrant, sustainable communities.

Brownfield sites already have access to existing infrastructure (including utilities and transport) and are ideal for reducing urban sprawl; utilise existing urban outlay; improve extant environmental impact; support nearby existing amenities and are more likely to promote local building and construction businesses.

Sustainable Housing. Some 20-50% of a building's energy use comes from building it, not heating it. The 'greenest' building is one already built.²

The NPPF December 2024 (amended 7 February 2025)³

The NPPF Section 11 (Making effective use of land) states:

- Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. NPPF 124 states "strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or '**brownfield**' land".
- give substantial weight to the value of using suitable **brownfield** land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
- promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lockups and railway infrastructure.
- Under NPPF 126 local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on **brownfield** registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by the use of compulsory purchase powers where appropriate.

² The Sunday Times, 15 February 2026.

³ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

‘Brownfield’ Development Potential in Warminster

Definition: A brownfield site is previously developed land that is currently abandoned, disused or under-utilised. In addition, empty retail/business premises have been identified as potential residential development opportunities (most of those in Warminster have been empty for some considerable time) and also council owned/run car parks represent space which can also be developed (all in accordance with the NPPF guidance above).

Over the last 20+ years a number of brownfield sites and former retail premises have been developed as residential properties. Of particular note are Imber Court and Crescent Place retirement complexes; former antique shops on Silver Street; the old police houses on Station Road; the four houses on the corner of Fairfield Road and Station Road; and the block of homes on the former Scout site on Station Road.

The Neighbourhood Plan 2026

The Neighbourhood Plan 2026 (covering a period out to 2038) is in consultation stage but identifies the need for up to 90 dwellings to meet the needs of Warminster (see footnote 1). Page 43 of the draft plan considers town centre housing and its findings are:

- “Town centres are changing from retail to mixed uses, restoring diversity and community life. Housing is recognised as an important part of this mix” (c.26).
- “Converting under-used or empty upper floors into small town centre flats can provide entry level housing, helping to meet a need identified in the Warminster HNA” (c.27).
- “The Warminster TCMP has analysed the potential for residential development in spaces above shops” (c.28).
- The conclusion is that “within Warminster town centre planning proposals for change of use of existing floorspace to residential use will be supported subject to meeting relevant criteria.....” (Objective 8 of the Neighbourhood Plan).

The population of Warminster consensus is *“develop on brownfield sites, infill in town centre to make use of empty buildings”*.

Below is a list of potential sites based on a spot survey conducted in November 2025 (it is not exhaustive):

- East Street:
 - Empty site between old Post Office and retirement home
 - Masons Arms site
 - Old Post Office building
 - Old Nat West Bank site
 - 5 premises along north side of East Street
- Market Place:
 - Empty site between My Dentist and old Wiltshire Carpets shop.
 - Old M&Co site.
 - Old town hall (corner of Weymouth Street)

- Old Barclays Bank site
- Old Cordon site.
- Old La Dolce Vita restaurant
- Demolition site next to St Lawrence church
- Old Organ Inn
- Original Factory Shop
- George Street:
 - Old Homemakers annex
 - Old Scholars site
- Silver Street:
 - Old Annabelle's gift shop
 - Old Happy Days Dog grooming
 - Old Silver Street vets
 - Old Silver Street News
 - Old management accountants premises next to above
- Weymouth Street/Chinn's Court:
 - Site between former AJ's Club and Barber Animal Feeds
 - Old John Barleycorn nightclub
 - Old music studio on Chinn's Court carpark.
- Three Horseshoes/Cornmarket/North Row/ Station Road:
 - Land behind old police houses
 - Old M&Co staff carpark
 - Warminster Community Hub
 - Cornerstone Warminster
 - Dewey House (old Foodbank)
- The Close/Portway:
 - Old Progression Physio site
 - Vacant plot to left of Old Fire Station
 - Vacant plot behind Athenaeum Theatre.
- Victoria Road:
 - Potential vacating of Warminster Preparatory School site
- Factory Lane:
 - Old Cookery School site
- Council owned carparks:
 - Fairfield Road
 - The Central carpark (The Avenue)
 - Chinns Court
 - Civic Centre
- Military estate:
 - It has not been possible to assess the considerable military estate in Warminster Garrison but it is assumed that some potential must exist to develop what consists of substantial brownfield space.

On an objective assessment of the sites and opportunities above, there is sufficient 'brownfield' land to accommodate a minimum of 90 new homes within Warminster.

Summary

The government is prioritising a 'brownfield first' approach to boost house building. The land west of this Westbury Road application fails to follow this prioritisation in every respect – none of it is on brownfield land (not least it is on good quality agricultural land outside of the settlement boundary). There is more than sufficient potential brownfield and under-utilised development land within Warminster which would more than meet the identified housing target of 90 residences of mixed nature.

There is not only no need to agree to a speculative application on a non-brownfield site, but also an obligation on Wiltshire Council to work to bring the brownfield sites forward in preference to a speculative 'green' one. As there is sufficient brownfield land available, there is a duty placed on Wiltshire Council to ensure that they comply with NPPF 124 by making it policy to bring forward brownfield land first. There is a secondary duty to take a proactive role in promoting brownfield opportunities. Several of those identified are council owned land.

Wiltshire Council cannot consider a speculative 'green' site until it can demonstrate compliance with the requirements of NPPF 124 and 126 and both identify the brownfield opportunity and take proactive steps to bring it forward. Such development would prove far more sustainable than the applicant's plans and serve to considerably revitalise the town and local community.