

PL/2026/00195 Land to the West of Westbury Road, Warminster. Infrastructure - or lack of it

Objection:

The application is for 205 houses. The Wiltshire Local Plan already identifies that plans for 1,700 houses have been approved and are in the process of being built out.

The Wiltshire Local Plan identifies key constraints in terms of education, health provision and sustainable transport.

NPPF requires that adequate infrastructure is in place to support development. This is demonstrably not the case with the 1,700 homes already granted planning permission. It is frankly inexplicable how they can accommodate a further 205 homes that have not yet been granted permission and from which minimum contributions are being requested. None of these are reflected in the applicant's proposals and where Officers have commented, the comments do not make sense or tally with the Wiltshire Local Plan.

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1. The Local Plan

The Local Plan is relatively light on detail and provision for infrastructure to support the over 1,700 houses for which planning permission has already been granted within Warminster.

The applicant's assertion that the slow progress in building these homes out is in some way a justification for approving their application is bizarre and contradicts common sense. If the identified infrastructure is inadequate to support 1,700 homes, then the probability of it supporting 1,900 homes, just because 205 will be delivered more quickly (and there is absolutely no guarantee of that) is zero.

I urge you to ignore this suggestion by the applicant as unsupportable.

The identified infrastructure needs in the Local Plan (updated last in September 2023) are in three areas: Healthcare, Education and Sustainable Transport.

On Education the Local Plan comments: *"Additional school places at both primary and secondary levels will be required to support the level of development planned at Warminster by the Local Plan and the Wiltshire Housing Site Allocations Plan. The strategic West Warminster Urban Extension site will deliver a new primary school along with contributions provided towards the expansion of Kingdown Secondary School."*

On Healthcare the following concerns are recorded: *"Warminster has one GP surgery that is understood to have capacity issues. There are not currently any redevelopment plans to help to*

overcome these capacity issues, and development must avoid placing additional pressure on services and support expansion with financial contributions.”

On Sustainable Transport the Local Plan notes the following: *“The West Warminster Urban Extension site will deliver new link roads connecting from Bath Road to Victoria Road and St Andrew’s Road. Financial contributions towards a new and/or enhanced bus service linking the site with Warminster town centre, Kingdown School and the east of Warminster will be sought. New and improved footways and cycle tracks will be provided within and outside of the site to secure good connectivity to the town and adjoining communities.”*

That is the infrastructure as identified in the Local Plan, so now let’s take a look at what is happening as regards the current application for another 205 houses.

2. NPPF

If that is what the Local Plan has identified as infrastructure needs for Warminster, how does that meet the requirements of the National Planning Policy Framework. Because remember that even where the Local Plan may be considered out of date, NPPF rules must be followed when making planning decisions.

The following four measure in NPPF are, demonstrably not met and adding the applicant’s site would simply make matters worse.

NPPF 35 requires that: Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (***such as that needed for education, health, transport, flood and water management, green and digital infrastructure***). Such policies should not undermine the deliverability of the plan.

NPPF 110 says: Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

NPPF 100 notes: It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a) give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications; and
- b) work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Finally NPPF 101: To ensure faster delivery of other public service infrastructure such as health, blue light, library, adult education, university and criminal justice facilities, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. **Significant weight should be placed on the**

importance of new, expanded or upgraded public service infrastructure when considering proposals for development.

3. Education

a) secondary

The Local Plan has identified a need for more places in Warminster's only secondary school, Kingsdown School, to be delivered by a school extension, asked for one new primary school and further nursery provision.

That is to support the building of 1,700 new homes that already have planning permission. In addition and anecdotally, Kingsdown School is currently full and struggling to provide places.

The planned expansion to Kingsdown School is for 300 places, funded by developer contributions from the Western Urban Extension.

Using the same multiples used by the Education Department to calculate places required at the applicant's site, that would suggest the 1,700 houses already with planning permission will require 340 secondary school places.

The applicant's site would require a further 40 secondary school places if it was granted planning permission.

Yet the education team have asked for a zero contribution from the applicant towards secondary places. As there is no other state funded secondary schools within a three mile radius, the assumption must be made that Kingsdown School will provide for the applicant's site if it was given planning permission. Yet bizarrely no contribution is sought. We can only conclude that this is in breach of NPPF 35 that says contributions should be sought, and NPPF 100 that suggests choices should be available for secondary schools. Clearly in this instance there is no choice and the existing school does not have the capacity required to meet the education needs of pupils aged 11-16 from any new site over and above the 1,700 homes already planned for.

b) primary

The same is true for the 56 primary school places that have been assessed as being required if the applicant's site were to be approved.

The Western Urban Extension will result in a new primary school as it is recognised the other primary schools in the area are full. That new primary school is expected to accommodate 420 pupils.

Using the same metrics that the Education Department applied to the applicant's site, the 1,700 homes already approved for Warminster would require 464 new primary school places. Add on the 56 from the applicant's site and that suggests a requirement of 520 new places.

Yet the provision envisaged with developer contributions committed already is for just 420 new pupils.

Why is no contribution being sought from the applicant for new primary school places?

There is a clear need.

Either the applicant should be required to make provision for primary education to extend the existing new primary school, or the application should be dismissed as there is evidently a lack of education infrastructure to support it.

c) early years - pre school

Finally I have commented in detail on the Education requirement elsewhere (comment number: WC-26-02-362482 submitted 6 February). In summary when making the

assessment of developer contribution to early years (pre school) education, in 2021 the education team used a multiplier of £17,522 per placement.

In 2026 the exact same multiplier has been used as was used in 2021.

So despite inflation and a gap of five years between assessments, the Education team is asking for a contribution per place of just £17,522.

Inflation across those 5 years is approximately 25%. In other words, £17,522 in 2021 terms would need to be £21,900 today.

Wiltshire Council is struggling with an accumulated Dedicated Schools Grant deficit that it expects to be £104.5m at the end of 2025/26. In 2027/28 that deficit will be added into the council's finances eliminating all of Wiltshire Council's reserves.

Residents and councillors should want to know why when the council faces such a large deficit on its schools budget, it is not asking for an appropriate contribution from developers towards providing school places.

None of which takes away from the central point that Wiltshire Council cannot demonstrate adequate education provision for the extra pupils that would be the result of approving the applicant's plans.

And hence this application if approved would be in breach of both NPPF 35 and NPPF 100.

4. Healthcare

No plans have been agreed to provide the healthcare infrastructure necessary to support either the 1,700 homes that already have planning permission or the 205 proposed by the applicant.

The Local Plan accurately identifies that: *"Warminster has one GP surgery that is understood to have capacity issues."*

This is a serious failing in infrastructure provision.

It is true that the last application submitted for this site did not seek a developer contribution. That is for the simple reason that when the local health authority were asked, they were changing from being a CCG to an ICB and the correspondence was lost in the move. The ICB (Bath Swindon and Wiltshire ICB or BSW) have confirmed to me in writing that: *"During the transition from the former Clinical Commissioning Groups (CCGs) to the ICB in 2022, a small number of planning consultations were not received or processed correctly. This was an isolated administrative issue linked to the merger. The previous absence of a response should not be taken as an indication that no additional health capacity is required."*

The applicant meanwhile is suggesting to you that the fact that no contribution was asked for last time means none is required this time.

The ICB also confirmed their position as follows: *"We are aware that a new planning application has been made for 205 homes at Westbury Road in Warminster and are currently assessing the implications of the proposed development on local health services. "Primary care services in Warminster are already under substantial pressure. Taking into account both the proposed 205 homes and wider planned housing growth for the area, our current modelling shows that additional primary care capacity will be required and we have already been successful already in securing Section 106 funding for additional primary care services."*

BSW ICB will be feeding back comments to Wiltshire Council on this application and will encourage our local practices to do so as well. Where our assessment confirms that new growth will generate additional demand for health services, we will request appropriate Section 106 developer contributions to help support the necessary expansion of local health infrastructure."

Given the current state of the GP surgery at The Avenue and the fact that at least 1,700 new homes are anticipated, it is inconceivable that either the ICB or Wiltshire Council can conclude that no contribution is required.

Without a contribution, Wiltshire Council cannot demonstrate an infrastructure for health which meets the NPPF requirement to support housing that has already received planning permission. It certainly cannot demonstrate an infrastructure that justifies approval of a further 205 houses.

Especially given that the Local Plan determines there is only a need for a further 40 new houses between now and 2038.

5. Sustainable Transport

The Local Plan refers to: *“New and improved footways and cycle tracks will be provided within and outside of the site to secure good connectivity to the town and adjoining communities.”*

In respect of the applicant’s site, obviously this is a long way from the Western Urban Extension.

We have shown in a separate paper on WARM 16 that the footpath that is essential to make the applicant’s site sustainable, is in fact inappropriate and cannot be made compliant with Department for Transport requirements or Equality Act 2010 requirements without substantial work. None of which has either been requested from the applicant or conditioned on them.

The other sustainable route offered by the applicant is along the east side of Westbury Road. It is proposed to drive a cycleway and footpath along what is currently a protected verge. The applicant has urged Wiltshire Council to acknowledge that there is no longer any need for the verge to be protected.

This has the advantage of allowing the proposed cycleway/footpath to go ahead.

Interestingly, shortly after the Planning Inquiry concluded, Wiltshire Council erected new “protected verge” signs along the route.

This begs a simple question. Was that a gratuitous waste of taxpayers money because the verge is indeed no longer worthy of protection.

Or is the protected verge valid. In which case there is no justification for the cycleway/footpath.

In either event, the cycleway/footpath ends at the foot of Elm Hill and it is far from clear how that will connect to the currently inadequate footways along Cop Heap Lane or the Portway. Neither can accommodate both cycles and pedestrians. So in terms of connectivity, in terms of sustainability and in terms of adequate infrastructure, the cycleway/footpath fails to provide what is required.

The applicant’s site is therefore in clear breach of NPPF 110.

6. Other

The Local Plan fails to take account of the need to accommodate traffic generated by new planning applications. Detailed traffic measurements have not been incorporated into the applicant’s plans.

What is clear is that traffic volumes along the Westbury Road have increased significantly since 2021.

Unfortunately where traffic surveys are carried out, they have a habit of being done in holidays and other off peak times which gives a misleading impression of regular traffic volume.

One such survey carried out by Auto Surveys Limited on the Westbury Road between 14th and 20th August (in the middle of the school summer holidays) identified:

Northbound: 4,674 vehicles a day

Southbound: 4,792 vehicles a day

Passing any given point in either direction, that equates to an average of under 400 vehicle movements an hour across all 24 hours.

Looking at the peaks, the survey identified a peak of 734 vehicle movements in either direction at 4pm. That's 12 vehicles a minute.

And this is in the school holidays.

We undertook our own traffic survey from the 3-9 November (ie in term time) looking at peak hours between 8 and 9 in the morning and again between 4 and 5 in the evening.

That revealed the following average traffic movements in either direction at a given point during weekdays:

Between 8 and 9 am: 1,021

Between 4 and 5 pm: 971

Unsurprisingly these are much higher than the figures recorded by Auto Surveys Limited, but importantly they are not out of line with their findings.

Now imagine a motorist trying to turn onto the Westbury Road at peak hours with an average of 16 cars a minute going past in either direction.

It is clear that no adequate assessment of traffic volumes has been carried out. The applicant's site would add around 300 vehicles to the Westbury Road. Westbury Road is already congested and dangerous. I refer you to p72 of the applicant's Planning Statement which quotes the Council's Highways Officer as follows: ***"WARM 16 is necessary to offset the relatively inhospitable pedestrian access along Westbury Road, which is subject of relatively high traffic flows being a key commuter route into and out of the town."***

Approving this application will significantly increase traffic on the Westbury Road, whatever alternative provisions are made. No infrastructure improvements have been included in the Local Plan to mitigate the increase in traffic on an already congested road. Regardless of whether or not sustainable options are available to link the site to the town centre (and I contend they are not available) the Westbury Road traffic problem has not been addressed. This must therefore be assessed as a "disbenefit" when looking at the planning balance of the site.