

Land at Home Farm, Warminster

Planning and Affordable Housing Statement

Bellway Strategic Land

24 April 2026

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Contents

1.0	Introduction	1
	Application Documents	2
2.0	Application Site and Context	4
	Consultation, Engagement and Design Evolution	7
	EIA Screening	7
3.0	Summary of the Proposed Development	9
4.0	Policy and Statutory Considerations	10
	The Development Plan	10
	Other Material Considerations	12
	Key Policy Considerations	14
5.0	Principle of Development	16
6.0	Housing Delivery and Mix	18
7.0	Heritage	20
	Historic England Pre Application	20
	Heritage Design and Impact	20
	Heritage Balance	22
8.0	Landscape and Visual Impact	23
9.0	Design and Amenity	25
10.0	Flood Risk and Drainage	28
11.0	Transport and Movement	30
	Access	30
	Parking	31
	Travel Plan	32
	Summary	32
12.0	Ecology, Arboriculture and Lighting	33
	Ecology and Biodiversity	33

	Arboriculture	35
	Lighting	35
13.0	Sustainability and climate change	37
14.0	Other environmental matters	38
	Noise and Air Quality	38
	Waste	39
	Nutrient Neutrality	39
15.0	CIL, S106 and Conditions	41
	CIL	41
	S106 Heads of Terms	41
16.0	Planning Balance and Conclusion	42
	The Development Plan	42
	The Public Benefits of the Proposal	42
	The Heritage Balance	43
	The Tilted Balance	43

1.0 Introduction

- 1.1 This Planning and Affordable Housing Statement has been prepared by Lichfields on behalf of Bellway Homes Ltd (hereafter referred to as ‘the Applicant’), to support a planning application for Land at Home Farm, North of Boreham Road, Warminster (‘the Site’), for the following development (the ‘Proposed Development’):

“Full planning permission for residential development (Use Class C3) comprising 135 dwellings with associated private amenity space and car/cycle parking, a comprehensive landscaping scheme to include publicly accessible amenity space, sustainable drainage features, new tree planting and associated works. Alterations to the existing Home Farm access from Boreham Road, including demolition of a section of boundary wall, and new vehicular, cycle and pedestrian routes through the site. Restoration and widening of existing pedestrian opening in the wall to Boreham Road. All associated infrastructure works”.

- 1.2 The purpose of this Planning Statement is to assess the Proposed Development against relevant planning policy and other material considerations. To do this, it draws from other documents and information accompanying this application to which the reader should refer for further detail.
- 1.3 The Site is not allocated for housing in the adopted Wiltshire Core Strategy / Housing Site Allocations Plan, nor in the draft Local Plan which is currently submitted for examination – albeit Inspectors have requested that the Council withdraws this Plan as it is considered unsound. Wiltshire Council will now be required to prepare a new Local Plan under the new plan making system, to meet the full standard method housing requirement, with work commencing by 30 June 2026.
- 1.4 The draft Local Plan, which was proposing to meet 59% of Wiltshire’s housing requirement, identified a need for a minimum of 90 homes to come forward in Warminster via the Neighbourhood Area Designation i.e. a Neighbourhood Plan [note that this figure is only likely to increase under the new Local Plan, given the step change in housing numbers across the district]. The Regulation 14 pre-submission consultation on the draft Neighbourhood Plan commenced on 26 January 2026 and closes on 23 March; this draft allocates the Site (Land East of The Dene (Home Farm)) for 90 dwellings and circa 6ha of land for public open space/biodiversity enhancements i.e. it has been identified as the site to deliver housing to meet Warminster’s need over the next Plan period.
- 1.5 The overriding policy context for this application is therefore:
- 1 Wiltshire Council is unable to demonstrate a five-year housing land supply (5YHLS) and adopted planning policies relating to the spatial strategy and locational housing policies are out of date; the presumption in favour of sustainable development and associated tilted balance is therefore engaged in accordance with para. 11 of the NPPF (2024). The delivery of housing proposed in this application should be given very substantial weight, along with substantial to moderate weight given to the numerous other benefits detailed in this Statement; there are no adverse impacts which would significantly and demonstrably outweigh these benefits. The proposed development is in a sustainable location, makes effective use of land, will deliver a well-designed place

and will provide much needed affordable housing across a range of types and tenures. It is also a detailed application submitted by a housebuilder, with the proposed housing therefore capable of delivery within the next 5 years.

- 2 Wilshire's draft Local Plan identifies an outstanding housing need for Warminster (accounting for all proposed allocations in the draft Plan – which will need to increase to meet full housing need in the forthcoming new Local Plan) of 90 dwellings. The Regulation 14 Neighbourhood Plan identifies this Site as the proposed allocation to meet this need. The evidence base to the Neighbourhood plan demonstrates that the draft allocation is based on a thorough assessment of all potential land in Warminster. This application has been prepared in full support of that draft allocation, to demonstrate the Site is available, deliverable and suitable and all technical constraints can be overcome/mitigated.

- 1.6 The proposals have been subject to pre-application engagement with the local community, Wiltshire Council (Planning, Highways and Conservation) and Historic England, and feedback has informed the application. Further detail is provided in Section 2.0 and the accompanying Statement of Community Involvement (SCI).

Application Documents

- 1.7 This Statement, should be read in conjunction with the following documents:

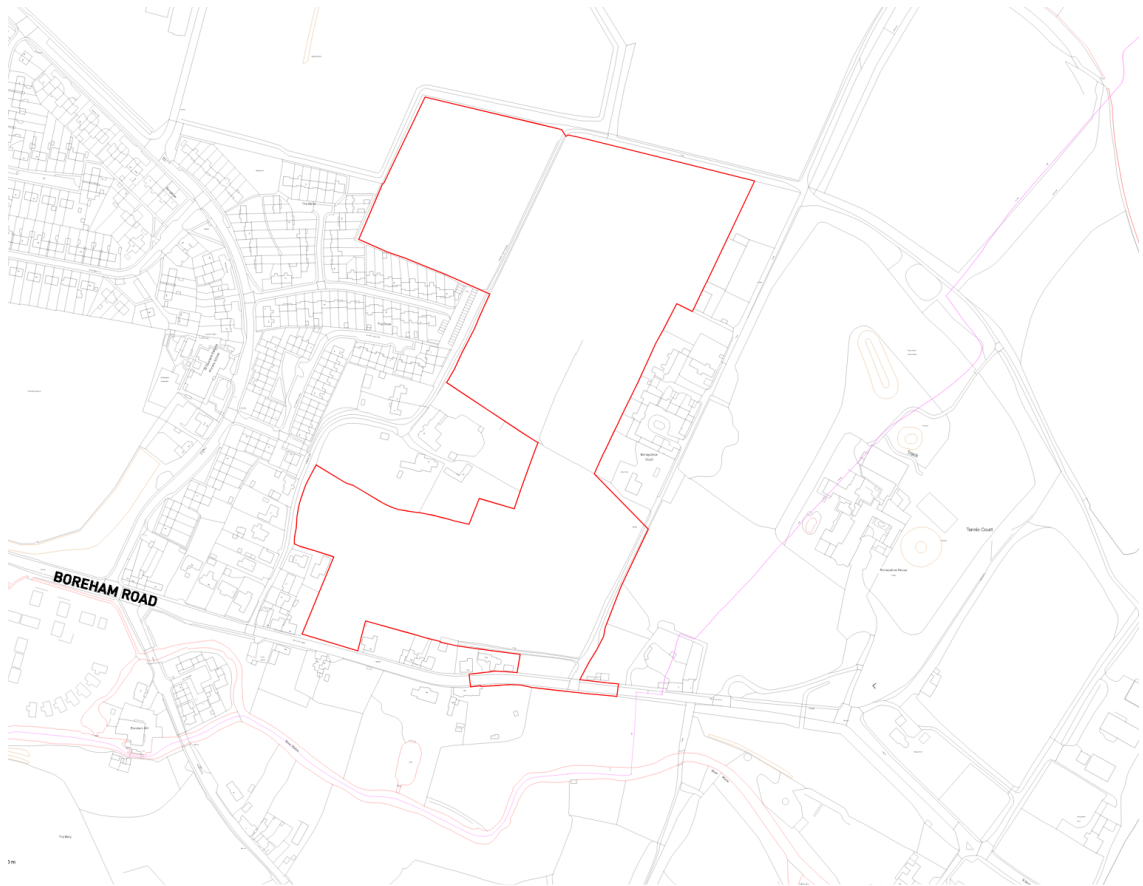
- 1 Application Form, CIL Form 1, Ownership Certificates
- 2 Covering Letter
- 3 Drawings package (see Annex 1 of Covering Letter)
- 4 Design and Access Statement
- 5 Air Quality Assessment
- 6 Noise Impact Assessment
- 7 Ecological Impact Assessment
- 8 Biodiversity Net Gain Report and Metric
- 9 Statement of Community Involvement
- 10 Flood Risk Assessment and Drainage Strategy Report
- 11 Sequential Test (Flooding) Report
- 12 Heritage Impact Assessment
- 13 External Lighting Design Strategy
- 14 Section 106 Statement / Heads of Terms (Section 16 of this Planning Statement)
- 15 Energy and Sustainability Statement
- 16 Transport Statement
- 17 Travel Plan
- 18 Landscape and Visual Impact Assessment
- 19 Archaeology Desk-Based Assessment

- 20 Waste Audit
- 21 Nutrient Neutrality Assessment
- 22 Arboricultural Impact Assessment
- 23 Fire Statement

2.0 Application Site and Context

- 2.1 The site extends to approximately 10.5ha and is located on the eastern edge of Warminster. It comprises four agricultural field parcels; two to the north and two to the south which are connected by a shared field boundary at the centre of the site. There are hedgerows and trees interspersed throughout the site.

Figure 1: Site Location Plan



Source: Pegasus

- 2.2 The Site has a strong association with Warminster's eastern edge, with the settlement boundary running along the western edge of the Site and the main link road into Warminster, Boreham Road, along with some existing residential properties, running along the south of the Site. The wider Site context comprises:
- To the North: The Warminster Garrison and land associated with the MOD, beyond which lies the Battlesbury Hillfort Scheduled monument (c. 730m north).
 - To the South: The existing access road that runs through the site adjoins Boreham Road which runs along the southern boundary of the Site, with a number of residential dwellings including two Grade II listed buildings (The Cotes and the Stable Building), with a small part of the site to the south-east located within the Bishopstrow Conservation Area. Two lengths of the Boreham Road boundary wall are located within the Site. Wiltshire Council has identified the majority of this wall as a non-designated

heritage asset, except for the length of wall located immediately west of The Cotes, which is considered to form part of the Grade II listed building.

- To the West: Existing residential development accessible off Woodcock Road and The Dene, including three grade II listed buildings (The Pavilion To East of Grange Farmhouse and 15 and 17 Grange Lane), and
- To the East: Home Farm and Bishopstrow Court (residential dwellings) with large agricultural barns to the north-east which have approval for conversion to residential, with a shared access road running north-south, and beyond this the Bishopstrow Hotel and Spa (Grade II Listed) with its associated parkland.

- 2.3 The site has good sustainable transport links into Warminster, with Bishopstrow Road bus stop 100m west of the site which is served by bi-hourly buses into the centre of Warminster. The site is traversed and bound by various Public Rights of Way (PRoWs) and is within walking distance of a local convenience store, Warminster Sports Centre, St George's Primary School and Kingdown Secondary School.

Ecology

- 2.4 There are no statutory ecological designations on the Site. The nearest statutory ecological designated is the River Avon Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), approximately 85m to the south. Salisbury Plain Special Protection Area (SPA), SAC and SSSI is approximately 800m north. Two others SSSI's are located within 5km: Scratchbury and Cotely Hills SSSI is located approximately 1.4km to the east and Upton Cow Down SSSI is located approximately 4.7km to the north west.
- 2.5 The closest designated nature conservation area is the River Wylde Local Nature Reserve (LNR) located approximately 600m to the west and on the southern edge of Warminster.
- 2.6 The site is within the Hampshire Avon Catchment, meaning that development on the site needs to demonstrate phosphate neutrality.

Landscape and Heritage

- 2.7 There are no landscape designations on the Site. The Cranborne Chase and West Wiltshire Downs National Landscape is located approximately 1km to the south at its closest point.
- 2.8 In addition to the wall to the west of The Cotes (Grade II) noted above, there are other heritage designations in close proximity. Two listed buildings sit north of Boreham Road adjacent to the southern boundary of the Site, the Grade II Listed 'The Cotes' and a Grade II listed former Stables. The Grade II Listed Pavilion is to the east of The Grange Farmhouse and is Grade II Listed. 15 and 17 Grange Lane, are approximately 50m west. The Bishopstrow Hotel and Spa (Grade II Listed) is approximately 170m east.
- 2.9 Within close proximity of Bishopstrow House, and to the east of the Site, are three Scheduled Monuments: two Bowl Barrows, funerary monuments dating from the Late Neolithic period to the Late Bronze Age; and a King Barrow, a type of funerary monument known as a long barrow dating from the Early and Middle Neolithic periods (3400-2400 BC). Approximately 730m to the north is Battlesbury Camp (Scheduled Monument), an Iron Age hillfort, unenclosed Iron Age settlement, cemetery, three bowl barrows and a field system located on raised ground.

- 2.10 A small part of the Site, at its south-eastern corner, crosses into the Bishopstrow Conservation Area, along Boreham Road only. The Conservation Area borders part of the southern and eastern boundaries along Boreham Road and the Bishopstrow Court / Home Farm access road.
- 2.11 The boundary wall to the south, adjoining Boreham Road, has been identified as a non-designated heritage asset, with the length of wall immediately west of The Cotes, having recently been identified as forming part of the Grade II listed building.

Flooding

- 2.12 The site is located within fluvial flood risk zone 1. There are no areas of surface water flood risk in the areas of the proposed for access/residential development. The site is located within an area at risk of groundwater flooding, as identified in Wiltshire's SFRA, with a possibility of groundwater emerging at the surface locally (medium groundwater flood risk), with a small area to the south of the site subject to high groundwater flood risk.

Planning history

- 2.13 The site was subject to an outline planning application in 2016 (ref. 16/10502/OUT), submitted by Hallam Land for:
- “Demolition of existing agricultural building, removal of a section of boundary wall, and residential development of up to 135 dwellings with associated access, landscaping and open space (Reserved matters: Access).”*
- 2.14 The application was submitted in support of the Site's draft allocation in Wiltshire's Housing Sites Allocations Plan (WHSAP) for 100 dwellings. Whilst Historic England (HE) raised no objection to the planning application, they did raise concerns at the examination of the WHSAP and as a result the site was removed as an allocation (noting that this was notwithstanding Wiltshire Council's position that the Site could be brought forward in a manner acceptable from a historic environment perspective).
- 2.15 The Inspector's comments are important, particularly regarding the potential of the north-western area of the site for development. At paragraph 97 of the Inspector's report, it was recognised that the Council's Heritage Impact Assessment for the proposed allocation concluded that *“limited development to the north west of the site would avoid harm to heritage assets”*. The Inspector noted that the draft policy allowed development at the southern parts of the site, hence deletion of the allocation, but referenced that development in the northwest corner would not result in the same degree of harm to heritage assets. The Inspector stated this should be dealt with via the Local Plan Review.
- 2.16 On publication of the Inspector's Report, Hallam Land withdrew its planning application.
- 2.17 The Application now submitted by Bellway has been developed to positively respond to the evidence base and comments made by the Inspector and Historic England on the WHSAP draft allocation and (withdrawn) Hallam Land application (along with their associated evidence base / consultee comments) and follows extensive consultation with Historic England, Wiltshire Council and the Local Community as outlined within the SCI. The development now proposed protects and enhances the southern field as public open space,

with development contained to the north-western part of the Site. It fully addresses issues that have previously been raised about development in this location.

Consultation, Engagement and Design Evolution

- 2.18 The accompanying Statement of Community Involvement (SCI) outlines the steps the Applicant has taken to engage with the local community, which include:
- 1 A pre-application submission to Wiltshire Council in August 2025. A meeting with the case officer was held in early December 2025 to discuss the proposals. A written pre-application response was received on 19 March 2026;
 - 2 An in-person consultation event was held at Warminster Civic Centre on 19 November 2025. The Applicant offered a focussed consultation session with Warminster Town Council ahead of the consultation, however Warminster Town Council declined attendance. A pre-meet to the main public session was attended by the local residents' group East Boreham Business and Resident Action Group (EBBRAG);
 - 3 A consultation website, with an accompanying survey, was available for submission of comments between 5 November 2025 - 5 December 2025 and publicised via issue of leaflets to local residences; and,
 - 4 A discussion regarding the site was held with the Warminster Neighbourhood Plan Steering Group on 8 January 2026.
- 2.19 Further details regarding comments and material consulted upon can be found within the accompanying SCI. Key themes identified in the feedback provided during the community consultation were:
- 1 Requirement for affordable housing;
 - 2 Ecology and Biodiversity;
 - 3 Heritage Impact; and,
 - 4 Transport implications.
- 2.20 Bellway and its project team have considered the submitted feedback, and responses are provided within the SCI.
- 2.21 With regards to the pre-application response, given time between pre-application submission and receipt of response, the nature of the proposed development and its planning context had evolved. Therefore, advice was reviewed and reflected where still relevant / applicable only
- 2.22 Further direct pre-application engagement with Wiltshire Council's Conservation department identified that Listed Building Consent (LBC) would be required to agree the detailed schedule of works required to re-open a pedestrian entrance to the site via a Grade II Listed section of boundary wall along Boreham Road. An application for LBC is being prepared and will be submitted under separate cover.

EIA Screening

- 2.23 We have considered the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The scheme is one to which the EIA Regulations

may apply because it falls within Schedule 2 Part 10(b), as an urban development project where the site area exceeds 5ha. For Schedule 2 developments, the EIA Regulations require that EIA is undertaken where *“the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.”* Schedule 2 developments are not automatically subject to EIA.

- 2.24 Lichfields submitted a negative screening request to Wiltshire Council on 17 February 2026. In our view, given the nature of the proposed development and likely effects that have been identified, we consider that EIA is not required. Consequently, this application is not accompanied by an Environmental Statement. Environmental effects have, however, been thoroughly assessed and mitigation is explained in the documents which accompany this application.
- 2.25 Informal feedback from Wiltshire Council on 22 April 2026 confirmed agreement to the conclusions of the submitted screening request / the completed EIA Screening Checklist i.e. this is not considered EIA development, noting a formal Screening Opinion would follow.

3.0 Summary of the Proposed Development

3.1 This application seeks: “*Full planning permission for residential development (Use Class C3) comprising 135 dwellings with associated private amenity space and car/cycle parking, a comprehensive landscaping scheme to include publicly accessible amenity space, sustainable drainage features, new tree planting and associated works. Alterations to the existing Home Farm access from Boreham Road, including demolition of a section of boundary wall, and new vehicular, cycle and pedestrian routes through the site. Restoration and widening of existing pedestrian opening in the wall to Boreham Road. All associated infrastructure works*”.

3.2 The proposals are set out in detail in the Design & Access Statement, and on the planning drawings, in the Heritage Impact Assessment and within the Landscape & Visual Impact Assessment. In summary, the proposals comprise:

- 1 Demolition of part of the southern boundary wall to widen the existing Home Farm / Bishopstrow Court access from Boreham Road;
- 2 Restoration of the existing (boarded up) pedestrian access through the southern boundary wall to/from Boreham Road;
- 3 Construction of 135 new dwellings (C3 residential use) comprising 1-5 bedroom houses, contained to the north-western section of the site, including 40% affordable housing. All homes will be two storeys in height. The mix is as follows:

Size	Market	Affordable	Total
1 Bed (flat)	0	6	6
2 Bed	8	16	24
3 Bed	30	30	60
4-bed	39	2	41
5-bed	4	0	4
Sub Total	81	54	135
Total	135		

- 4 A new access through the southern field connecting Boreham Road to the proposed residential development to the north-west, enabling vehicular, cycle and pedestrian access, whilst also enhancing the existing vehicular access to Home Farm / Bishopstrow Court (including a new passing place) and to the rear of two properties fronting Boreham Road;
- 5 Comprehensive landscaping scheme including undergrounding of overhead cables, creation of c. 6 hectares of public open space with tree and other planting, significant areas protected and enhanced for wildlife, provision of equipped children’s play space, a number of new foot and cycle ways through the site and enhancements to existing on-site Public Rights of Way (PRoW), and wider connections into off-site PRoW;
- 6 Site-wide sustainable drainage system with a drainage basin, swales, rills etc. incorporated into the landscape design; and
- 7 Car and cycle parking to serve the development, including electric vehicle and bike charging.

4.0 **Policy and Statutory Considerations**

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications are to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and the extant permission are material considerations.

The Development Plan

- 4.2 The Statutory Development Plan for Wiltshire comprises:
- 1 Wiltshire Core Strategy (WCS), adopted in January 2015 and incorporating the saved policies from former District Local Plans;
 - 2 Wiltshire Housing Site Allocations Plan (2020);
 - 3 Minerals and Waste Policies; and,
 - 4 Warminster Neighbourhood Plan (2016).
- 4.3 The made Neighbourhood Plan (2016) for Warminster is out of date. Warminster Town Council is in the process of preparing an updated Neighbourhood Plan (NP2), and undertook Regulation 14 consultation between 26 January and 23 March 2026. It is anticipated that the NP2 will be submitted for independent examination in Summer 2026.

Wiltshire Core Strategy (WCS)

- 4.4 The WCS was adopted in 2015 and replaced the South Wiltshire Core Strategy as well as a number of policies from the former district council's local plans. It provides the overarching planning policy framework for Wiltshire for the period up to 2026, noting it is now over 10 years old and various policies are out of date. It only plans for development over the period to 2026.
- 4.5 The following policies are relevant to the proposals, albeit a number are now considered out of date:
- Strategic Objective 3: Providing everyone with access to a decent, affordable home
 - Core Policy 1: Settlement Strategy
 - Core Policy 2: Delivery Strategy
 - Core Policy 3: Infrastructure Requirements
 - Core Policy 31: Spatial Strategy for the Warminster Community Area
 - Core Policy 41: Sustainable Construction and Low Carbon Energy
 - Core Policy 43: Providing Affordable Homes
 - Core Policy 45: Meeting Wiltshire's Housing Needs
 - Core Policy 50: Biodiversity and Geodiversity
 - Core Policy 51: Landscape

- Core Policy 52: Green Infrastructure
- Core Policy 53: Wiltshire's Canals
- Core Policy 57: Ensuring high quality design and place shaping
- Core Policy 58: Ensuring the Conservation of the Historic Environment
- Core Policy 60: Sustainable Transport
- Core Policy 61: Transport and Development
- Core Policy 62: Development Impacts on the Transport network
- Core Policy 63: Transport Strategies
- Core Policy 64: Demand Management
- Core Policy 67: Flood Risk
- Saved Policy NE18: Noise and pollution
- Saved Policy H4: Residential Development in the Open Countryside

4.6 The site is not allocated in the WCS.

Wiltshire Housing Site Allocations Plan (WHSAP)

4.7 The Wiltshire Housing Site Allocations Plan was approved by Council on 25 February 2020. Its purpose is to revise settlement boundaries with regards to Principal Settlements, Market Towns, Local Service Centres and Large Villages across Wiltshire and to allocate new sites for housing to assist the LPA in demonstrating a five year housing land supply up to the end of the current Plan period (2026).

4.8 As previously mentioned, the site was previously allocated in the draft WHSAP before being removed by the inspector at examination on the grounds of a Historic England objection in relation to potential effects on Battlesbury Scheduled Monument and wider views. It is considered that the current application has overcome the issues raised by Historic England and the Inspector at examination as a result of a redesign of the proposals/protecting the southern field from development. This approach was referenced by the examining inspector in his concluding report. Whilst the Site is not allocated within the WHSAP, and even with the action undertaken by Wiltshire Council to try to increase housing supply through the emerging Local Plan, Wiltshire still cannot demonstrate a five year housing land supply. There is, therefore, a need for suitable sites, such as this, to come forward.

Emerging Local Plan

4.9 The Wiltshire Local Plan Review was submitted to the Secretary of State on 28 November 2024 under the December 2023 NPPF plan-making system. Stage 1 and 2 hearings took place in relation to the emerging Local Plan. Following consideration of key issues raised within the early hearings, the Inspectors wrote to Wiltshire Council setting out that the Wiltshire Plan could not be recommended for adoption as submitted. Wiltshire Council will now need to decide whether to withdraw the Local Plan review, or proceed to request the Inspector's recommendation (which would be for non-adoption).

- 4.10 Either way, Wiltshire Council will need to begin to prepare a new Local Plan under the December 2024 NPPF plan-making system (and the new NPPF on adoption), seeking to meet the full housing requirement established by the new standard method.

Emerging Warminster Neighbourhood Plan

- 4.11 Warminster Town Council is in the process of preparing a Neighbourhood Plan. Regulation 14 consultation commenced on Monday 26 January and closes on Monday 23 March 2026. The site (Site 13: Land East of the Dene (Home Farm)) is a draft allocation (the only large housing allocation, having been shortlisted from 15 sites and then from 3 sites during previous rounds of consultation) identified to deliver 54 market dwellings and 36 affordable dwellings, approximately 6ha of public open space, landscape buffering and biodiversity enhancements. This application is in accordance with these requirements, albeit it exceeds the 90 homes (which should be considered a minimum in any case).
- 4.12 One other site is allocated for residential development of 2 market dwellings through the conversion of the existing public house (the Yew Tree, Boreham Road).

Supplementary Planning Documents

- 4.13 Adopted Supplementary Planning Documents (SPDs) are material planning considerations in the determination of planning applications, albeit they do not form part of the adopted development plan.
- 4.14 The Wiltshire Design Guide Supplementary Planning Document was formally adopted by Wiltshire Council on 25 March 2024 and is relevant to the determination of this application. The Design Guide sets out the approach to appreciating context and focusing on what is important in design and place-shaping. It offers detailed 'expectations' on what new development should provide with regards to architectural quality, movement, public spaces, identity and nature considerations. This application is in accordance with these expectations.

Other Material Considerations

National Planning Policy

- 4.15 The revised National Planning Policy Framework (NPPF) was published in December 2024 and is a material consideration for planning applications; as clarified at Annex 1, its policies should be taken into account when dealing with applications from the day of its publication (para. 231). One of the central threads of the NPPF is the achievement of sustainable development. This is defined as having three key dimensions: social, economic and environmental (para 8). The following chapters of the NPPF are of relevance to this application:
- 1 Chapter 2: Achieving sustainable development
 - 2 Chapter 5: Delivering a sufficient supply of homes
 - 3 Chapter 6: Building a strong, competitive economy
 - 4 Chapter 8: Promoting healthy and safe communities
 - 5 Chapter 9: Promoting sustainable transport

- 6 Chapter 11: Making effective use of land
- 7 Chapter 12: Achieving well-designed places
- 8 Chapter 14: Meeting the challenge of climate change, flooding and coastal change
- 9 Chapter 15: Conserving and enhancing the natural environment
- 10 Chapter 16: Conserving and enhancing the historic environment
- 11 Annex 1: Implementation

Significant Housing Need

- 4.16 Paragraph 11 of the NPPF confirms decisions should apply a presumption in favour of sustainable development:

c) approving development proposals that accord with an up-to date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date [our emphasis], granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 4.17 Footnote 8 confirms that in relation to housing applications, the “*policies which are most important for determining the application are out-of-date*” include situations where the Local Authority cannot demonstrate a 5-year supply of deliverable housing sites (with the appropriate buffer), or the housing delivery test result falls below 75%.

- 4.18 As set out in the new NPPF, until such a time as a new Local Plan is adopted with a housing number below that of the new Standard Method (which is now highly unlikely, and Wiltshire will need to prepare a new Local Plan immediately which plans for the full housing requirement), and where the current strategic policies are more than 5 years old (as is the case with Wiltshire), the local housing need is calculated based on the new Standard Method + 5% (Para. 78). WC’s annual housing requirement has increased significantly from 1,917 to 3,525 dwellings per annum (dpa), which over 5 years almost doubles from 9,585 dwellings to 18,506 dwellings (the latter with a 5% buffer); a significant increase in required supply of 9,000 dwellings.

- 4.19 Wiltshire Council confirmed in June 2025 that its housing land supply now sits at 2.42 years; this equates to a shortfall of almost 10,000 homes. Recent appeal decisions have not interrogated this further, as it has been agreed via Statements of Common Ground that the Council is far short of demonstrating a 5-year housing land supply. **Para. 11d of the NPPF is therefore clearly engaged.**

Emerging Draft NPPF

- 4.20 The Ministry of Housing, Communities and Local Government (MHCLG) published proposed reforms to the National Planning Policy Framework on 16 December 2025 (consultation closed 10 March 2026). This currently holds no material weight for determination of planning applications. Despite this, the trajectory of the NPPF clearly demonstrates a greater weight in favour of sustainable development in order to meet national and local housing requirements, and the Government's intention is to adopt in Summer 2026; it is therefore likely to be relevant to determination of this planning application.
- 4.21 Within the consultation, MHCLG outlined draft 'Policy S5', which sets out a stronger presumption in favour of sustainable development for development sites adjoining or outside the settlement boundary, outlining that the following development should be approved outside the settlement boundary, unless the benefits of doing so would be substantially outweighed by any adverse effects [list not exhaustive]:
- "j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test²⁸), and where the development would:*
- i be well related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or*
 - ii comprise major development for storage and distribution purposes which accords with policy E3."*
- 4.22 It is important to note that the proposals would align with draft Policy S5 part j. i.

Key Policy Considerations

- 4.23 Our review of the policy framework has identified the following policy considerations that need to be considered in determining this planning application:
- 1 The Principle of Development
 - 2 Housing Delivery and Mix
 - 3 Heritage
 - 4 Landscape and Visual Impact
 - 5 Design and Amenity
 - 6 Flooding
 - 7 Transport and Movement
 - 8 Ecology, Arboriculture and Lighting
 - 9 Sustainability and Climate Change
 - 10 Other Environmental Matters

4.24 Our assessment of the proposed development against these considerations is set out in Sections 5 to 15.

5.0 Principle of Development

- 5.1 The starting point for decision making is Section 38(6) of the Planning and Compulsory Purchase Act 2004. This requires that determination should be made in accordance with the development plan unless material considerations indicate otherwise. In Wiltshire, the development plan is out of date due to being more than 5 years old, the Council does not have a 5-year housing land supply and the key policies for the supply and location of housing should be attributed limited if any weight. As set out at para. 4.16-4.19 above, Para. 11d is therefore engaged. This has been accepted by Wiltshire Council in determination various recent applications and at appeals.
- 5.2 Paragraph 11d of the NPPF requires that permission be granted unless:
- i. *“the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”*
- 5.3 In relation to (i), development of this Site would not impact on any Footnote 7 areas or assets afforded protection, such that this would warrant refusal. In relation to (ii) the following sections of this Planning Statement and the accompanying technical documents demonstrate that there are no adverse impacts which would significantly and demonstrably outweigh the benefits of this proposal, which are substantial. **The presumption in favour of sustainable development (NPPF Paragraph 11d) therefore applies.**
- 5.4 Warminster is an accessible location for growth, and the site is a sustainable location for development, adjacent to the settlement boundary and located in close proximity to local services. Warminster is one of Wiltshire’s Market Towns, sitting only below the principal settlements of Chippenham, Trowbridge and Salisbury in the settlement hierarchy, and above the local service centres and large and small villages; as a Market Town it provides services and facilities to serve both its own population and that of the surrounding rural area. In addition, the proposed development directly adjoins the existing settlement boundary to the west/south and falls outside of land subject to constraints such as Flood Zones 2/3. It is therefore relatively unconstrained, well located to link into and support sustainable transport choices, and would integrate well with existing communities, facilities, services and employment opportunities, as well as making efficient use of land.
- 5.5 There are no constraints that would preclude the development of the site.
- 5.6 Very significant weight must be given to the provision of both market and affordable housing in the context of an immediate and pressing need – particularly where the proposals exceed current policy requirements for affordable housing, aligning with what was stated to be emerging need in the draft Local Plan (40% as opposed to 30%) and in the draft Neighbourhood Plan (40%).
- 5.7 At least moderate weight must be given to the delivery of significant public open space/landscaping/tree planting proposed, and biodiversity net gain which materially

exceeds the required 10%. As summarised in the following sections, and detailed further in the supporting technical notes, these benefits significantly outweigh any impacts of the proposed development.

- 5.8 Further, the proposed development accords with the emerging Warminster Neighbourhood Plan allocation, and presents an opportunity to make efficient use of land through exceeding the allocation for a minimum of 90 dwellings.
- 5.9 The NPPF para. 11d presumption is clearly engaged. Wiltshire is in clear and pressing need of the housing proposed, at the earliest opportunity, and the evidence submitted with this planning application demonstrates that this is a suitable, viable, deliverable and sustainable location for housing development. Further, as a detailed planning application submitted by a housebuilder who will build out the development, there is certainty that the site will deliver housing within the 5-year period, assisting with WC's current shortfall.
- 5.10 In principle, the Proposed Development is acceptable.

Emerging Neighbourhood Plan

- 5.11 The Regulation 14 draft Neighbourhood Plan adds further weight to the in-principle acceptance of the proposed development. The site is draft allocated for the delivery of 90 dwellings, following a comprehensive assessment of sites within/adjoining Warminster's settlement boundary which concluded that Land at Home Farm ('east of the Dene') was the most suitable for delivering the homes that Warminster needs over the next plan period.
- 5.12 It is noted that the draft Neighbourhood Plan allocates the site for 90 dwellings (draft Policy HC3); this is on the basis that the draft Local Plan identified a requirement for Warminster to deliver a 'minimum of 90 dwellings' via the Neighbourhood Plan. This figure is a minimum, and on the basis the draft Local Plan was planning for a housing number far below that now required by the new standard method/new plan making regime, this number is only anticipated to increase.
- 5.13 Further, Warminster's local housing need assessment prepared as part of the evidence base for the Neighbourhood Plan identified a need for 90 affordable dwellings, which at 40% would require delivery of 225 new dwellings in total (at 30% this would require delivery of 300 dwellings). There is also a requirement to make most efficient use of land, and following detailed technical assessment and pre-application engagement with key consultee and stakeholder, the site was concluded to have capacity for 135 dwellings. This meets the requirement for a 'minimum of 90 dwellings', assists in meeting affordable housing need (54 of the 90 required dwellings) and makes most efficient use of land, in accordance with Core Policy 57 of the Core Strategy and the NPPF (existing and emerging).
- 5.14 Bellway has made representations to the draft Neighbourhood Plan, supporting the site's allocation, providing the technical evidence base to support its capacity to deliver 135 dwellings and clarifying some elements of the evidence base/draft policy text. In principle, the Neighbourhood Plan supports the delivery of housing on the site as proposed in this planning application, and the evidence base concludes Land at Home Farm is the most appropriate site to meet Warminster's housing needs. The emerging Neighbourhood Plan is anticipated to be submitted for examination in Summer 2026 and made in late 2026.

6.0 Housing Delivery and Mix

- 6.1 Wiltshire's Core Strategy and subsequent Housing Sites Allocations Plan allocated the development of 1,000 dwellings within Warminster, primarily within the West of Warminster Urban Extension. The Core Strategy identified a housing requirement of 1,920 dwellings for Warminster Town during the lifetime of the Core Strategy. Core Policy 45 of the Wiltshire Core Strategy requires development to incorporate a range of type, tenure and size for both affordable and market dwellings, reflective of local need in line with the Wiltshire Strategic Housing Market Assessment or subsequent Strategic Housing Market Assessments.
- 6.2 Warminster Town Council's NP2 Regulation 14 Consultation was supported by a Warminster Housing Needs Assessment (2023) (WHNA) prepared by arc⁴ Limited, which forms the most up to date housing needs assessment for Warminster. The WHNA and the Draft Local Plan outlined Warminster's additional housing need to 2036 to be 2,050 dwellings. The WHNA identified a shortage of 2 and 3-bedroom family market rented housing with off-street parking, with need primarily driven by in-comers to Warminster, with demand for both rental and home-ownership.
- 6.3 As outlined in table 6.1 below, 62% of the proposed dwellings are 2-3 bed homes. Of the market housing, 46.8% of the provision is 2-3 bed dwellings, all with off-street parking provision. Further, 48% of the market housing is 4-bed family housing, again with parking. The balance between provision of 2 to 3-bed dwellings and larger dwellings is to meet the identified need for downsizing of the ageing population of Warminster (paragraph 2.22 of the WHNA), and to provide an increase in family housing to balance the ageing population. Further, the proposed site is a suitable location for family homes, in close proximity (450m) to the local primary school and nursery, 600m from Bishopstrow College and will accommodate substantial public open space with equipped play facilities. The mix of market housing is therefore considered appropriate in the context of the WHNA and the sustainable location of the site, and aligns with Core Policy 45 of the WCS.
- 6.4 WCS Policy 43 outlines requirements for affordable housing (30% in the Warminster area), with tenure split to be agreed in line with Policy 45. The emerging Draft Local Plan establishes affordable housing requirements under Draft Policy 76 which, whilst not afforded weight given the emerging Plan has been found unsound, does provide an evidence base of up to date affordable housing need as follows:
- 1 Provision of 40% affordable housing;
 - 2 Tenure split of 65% Affordable Housing for Rent, 10% Shared Ownership and 25% First Homes; and,
 - 3 Affordable housing should be distributed across the whole site in small clusters and should be designed to be indistinguishable from other development.
- 6.5 Bellway has sought to meet this up to date need as part of its plans for Land at Home Farm, exceeding the requirements of adopted policy, with the mix set out in Table 6.1 below.

Table 6.1 Housign Mix by Tenure and Size

Size	Market	% (Market only)	Affordable	% (Affordable only)	% (Total)
1 Bed (flat)	0	0	6	11.1	4.4
2 Bed	8	9.8	16	29.6	17.7
3 Bed	30	37	30	55.5	44.4
4-bed	39	48	2	3.7	30.3
5-bed	4	6.2	0	0	3.7
Sub Total	81	100%	54	100%	100%

- 6.6 A total of 54 affordable dwellings will be provided within the development, which is 40% of the total housing provision, exceeding the 30% requirement for Warminster as set out in adopted CS Policy 43. Bellway is directly responding to the need identified within the emerging Wiltshire Local Plan and the WHNA, as well as that proposed in the emerging Neighbourhood Plan (which responds to the Local Plan evidence base) – notwithstanding these emerging policies carry no weight at present. It is important to recognise that this is a significant uplift, which we consider should attract **very substantial weight** in the planning balance. This is a significant benefit of the proposed development.
- 6.7 The affordable housing will be tenure blind and the layout plans demonstrate it is dispersed throughout the development between market housing. It comprises a mix of tenures including social rented and shared ownership, across a range of sizes/house types which reflect that set out under Draft Policy 76 of the emerging Local Plan i.e. 65% Affordable Housing for Rent, 10% Shared Ownership and 25% First Homes. This split is outlined in Plan ref. P22-1991-DE-02-A-16. The applicant would welcome the opportunity to discuss the proposed split with Wiltshire Council as part of the determination of this application, to accord with current need where possible.
- 6.8 The Proposed Development will therefore provide a balanced, sustainable, inclusive and vibrant community contributing significantly towards meeting the wide and diverse range of housing needs in Wiltshire. The housing mix accords with and exceeds adopted Policy 43 and Policy 45 and the latest housing needs assessment, and aligns with the aims for affordable housing provision in the draft Local Plan (which is based on an evidence base reflective of up to date housing needs) and Warminster draft Neighbourhood Plan.

7.0 Heritage

- 7.1 CS Policy 58 outlines that development should protect, conserve and where possible enhance the historic environment with designated heritage assets and their settings being conserved and where appropriate enhanced in a manner appropriate to their significance.
- 7.2 The Site's heritage context is outlined in Section 2.0 of this report, and Section 4 of the accompanying Heritage Impact Assessment.

Historic England Pre Application

- 7.3 A pre-application enquiry was submitted to Historic England (HE) in April 2025 to seek commentary regarding the proposed development, following HE's engagement with the site in the Wiltshire Housing Sites and Allocations Plan examination (6 March 2019).
- 7.4 Historic England's response (15 May 2025) is summarised as paragraph 2.14 of the accompanying Heritage Impact Assessment (HIA) prepared by Lichfields. Three recommendations were made as part of the pre-application response to inform ongoing design work:
- 1 'We would strongly encourage the development of a comprehensive HIA which uses Landscape and Visual Analysis to determine which assets are likely to be impacted (rather than just an arbitrary boundary). A more detailed HIA will be able to inform the development of the masterplan insofar as how harm from the proposals to designated heritage assets can be minimised using good design and, where necessary, screening.'
 - 2 'The HIA should also utilise the Historic England Good Practice Advice Note 3 (GPAN3): The setting of Heritage Assets. We would particularly draw your attention to any impacts from the increased lighting of the area that will inevitably accompany the proposals, and the effectiveness of vegetation screening.'
 - 3 'If vegetation screening is to be used to reduce any impacts of the proposals, we would encourage a considered approach which utilises depth of planting rather than a linear boundary.'
- 7.5 These recommendations have been fully addressed by the proposed scheme.

Heritage Design and Impact

- 7.6 Key features have been incorporated into the design proposal to accommodate the surrounding heritage setting of the site:
- 1 Retention of a visual corridor between Battlesbury Hillfort and Bishopstrow Conservation Area, with glimpsed views from the proposed Boreham Road access;
 - 2 Re-opening and repair of the wall to the west of The Cotes (Grade II) to form a new pedestrian entrance to the south-west of the Site to facilitate pedestrian access;
 - 3 Siting of residential development to the north-west of the site to preserve views from Grade II Listed Bishopstrow House Hotel;
 - 4 Scattered tree-planting throughout open space to the south of the Site;
 - 5 Non-linear tree-planting to the north-western development edge; and,

- 6 Physical separation of residential development and Bishopstrow Conservation Area;
- 7 ‘Sinking’ the access road to mitigate impacts on views from Grade II Listed Bishopstrow House Hotel;
- 8 Provision of low bollard lighting along the access road to reduce visual impacts for Grade II Listed Bishopstrow House Hotel; and,
- 9 Reinforcement of existing hedgerows and new tree planting to visually screen the proposed homes from south-facing views.

7.7 The accompanying HIA outlines the effects of the development on each of the designated and non-designated heritage assets. These effects are summarised in table 8.1.

Table 7.1

Heritage Asset	Designation	Development Effects on setting and significance
Bishopstrow Conservation Area	Conservation Area	Low level of less than substantial harm
2 Boreham Road Boundary Wall	Non-designated	Low degree of harm
Bishopstrow House Hotel	Grade II Listed	Less than substantial harm at the lowest end of the scale
The Cotes, Stables and 209-215 Boreham Road	Grade II Listed and non-designated (respectively)	Preserved
15 & 17 Grange Lane	Grade II Listed	Preserved
Pavilion to the East of Grange Farmhouse and the Grange	Grade II Listed and non-designated (respectively)	Preserved (Pavilion) Very low harm (The Grange)
Bishopstrow Home Farm	Non-designated	Low harm
King Barrow and two Bowl Barrows (in Bishopstrow House Grounds)	Scheduled Monuments	Preserved
Battlesbury Camp Monuments	Scheduled monument	Preserved
Middle Hill Round Barrow and Middlehill Settlement and associated cultivation earthworks	Scheduled monument	Preserved

7.8 Overall, the proposal is considered to have a low level of less than substantial harm to the significance of heritage assets of medium importance (the Bishopstrow Conservation Area and Grade II Listed Bishopstrow House Hotel). Low or very low harm to the significance of non-designated heritage assets is identified (Home Farm, the Grange and the Boreham Road Boundary Wall). Design features have been implemented to protect and conserve these assets, among others, where possible in accordance with Core Policies 57 and 58 of the Wiltshire CS. The setting and significance of all remaining heritage assets are preserved following the development.

7.9 Great weight must be given to the less than substantial harm to designated heritage assets identified within the planning balance, in accordance with the NPPF. The low/very low

harm must be assessed against the benefits of the proposed development, as outlined in paragraph 216 of the NPPF.

Heritage Balance

- 7.10 It is necessary to weigh the overall heritage harm, which is at the lower end of less than substantial, against the public benefits arising from the proposal in line with paragraph 215 of the NPPF. The conclusions on this are set out at Section 15.

8.0 Landscape and Visual Impact

- 8.1 CS Policy 51 states that development should not have a harmful impact upon landscape character and should protect, conserve and where possible enhance it. Any negative impacts arising from development should be mitigated as far as possible through sensitive design and landscape measures. The policy sets out a series of criteria that proposals need to demonstrate in order to show that landscape character has been conserved and where possible enhanced. Emerging Local Plan Policy 91 outlines requirements for development proposals to respect local features that add to a distinctive sense of place and echoes extant CS Policy 51 with regards to protect, conserve and, where possible, enhance landscape character.
- 8.2 On a National basis, the site is located in the Salisbury Plain and West Wiltshire Downs National Character Area (NCA). Locally, as identified in the West Wiltshire District Landscape Character Assessment (Chris Blanford Associates, December 2006), the site is in the Greensand and Chalk Terrace Landscape Type, and related subgroup Landscape Character Area (LCA) Warminster Greensand and Chalk Terrace.
- 8.3 The accompanying Landscape and Visual Impact Assessment ('LVIA') prepared by Pegasus confirms that the site and the immediate landscape is of **medium** landscape value overall, predominantly due to it being typical of the landscape surrounding the edge of Warminster. The susceptibility of the site's landscape to the proposed development is medium. The landscape sensitivity is therefore identified as medium overall.
- 8.4 The proposed development integrates a series of landscape features to accommodate visual setting of the site. Views which have informed the design process, as outlined in the LVIA, include:
- Local PRoW viewpoints (WARM40, WARM41, WARM39, WARM78, BISH6);
 - The Imber Range Perimeter Path and Wessex Ridgeway long distance route viewpoints;
 - Local Highways (Boreham Road); and,
 - Local places of interest, and sites of historic interest (Bishopstrow House Hotel, visitors to Battlesbury and Middle Hill).
- 8.5 These views have been established as important as a result of on-site specialist review and liaison with Historic England. Bellway sought to agree viewpoints as part of pre-application engagement with Wiltshire Council, but did not receive a response to this query.
- 8.6 Pegasus' assessment of the views identified a series of locations within the site that require sensitive landscape design in order to reduce harm in line with Policy 51 of the Core Strategy. Key landscape interventions include:
- 1 Siting of residential development to the north-west of the site only, retaining a visual corridor between the Bishopstrow Conservation Area and Battlesbury Hillfort;
 - 2 Tree and hedgerow planting to screen the residential development from north-eastern views from PRoW and the Salisbury Plains Special Protection Area and Site of Special Scientific Interest; and,
 - 3 Maintenance of parkland-style tree planting throughout the southern area of public open space in a manner typical of the Warminster Greensand and Chalk terrace LCA.

- 8.7 These themes have supported the landscape design as outlined within the accompanying Landscape Masterplan (ref. P22-1991_EN_05B) and detailed landscape design.
- 8.8 14 viewpoints have been assessed to identify the impacts of the proposed development (LVIA Appendix 3). 4 ATVs have been prepared to review the year 1 and year 15 change to the visual setting as a result of the development (LVIA Appendix 4), including night-time equivalents.
- 8.9 In summary, the changes arising from the development account to a **medium** magnitude of change and when combined with the **medium** sensitivity, have a **moderate adverse** effect on the baseline landscape character of the site itself and its immediate landscape context.
- 8.10 The LVIA identifies no change to any of the key characteristics of the Warminster Greensand and Chalk Terrace LCA, with potential **negligible** effects to perceived perceptual effects from lighting/increased traffic movements.
- 8.11 The topography of the site has **medium sensitivity** to the type of development. The site's topography is of medium value to the LCA, which produces medium sensitivity. There is a **low** magnitude of change to the topography of the site as a result of the proposed development, resulting in only a **minor adverse** effect, with mitigation planting proposed to screen level changes.
- 8.12 Trees and hedgerows are identified to have a high susceptibility to change, demonstrating **high** sensitivity. Overall, there is a localised **negligible** magnitude of change and a **negligible** adverse effect as a result of the development. The impact has been mitigated, including planting resulting in an increase in quantity of trees overall. The magnitude of change on tree resource would be **medium beneficial**. This would be **major beneficial** within the site once the trees mature in the context of the Greensand and Chalk Terrace LCA, in accordance with Core Policy 51.
- 8.13 The maximum impact of change is **minor adverse** at 15 years post development, with some **major beneficial** impacts with respect to trees. Whilst there are therefore some minor adverse landscape/visual effects (as would be expected for a greenfield development), there are also beneficial effects – including through considerable tree planting – and these must be weighed in the planning balance.
- 8.14 In summary, the proposed development is primarily identified / viewed within the existing urban context of Warminster's eastern edge. Substantial mitigation is proposed to reduce visual impacts, and the proposed site layout retains key visual features. No harm is identified that would preclude the development on the basis of CS Policy 51.
- 8.15 Furthermore, the scheme also results in wider landscape benefits including improvements to existing PROWs and extensive new areas of public open space, recreational routes, play provision and general amenity spaces. Approximately 56% of the site is opened up as accessible greenspace; **this should be afforded substantial weight in the planning balance.**

9.0 Design and Amenity

9.1 Core Policy 57 of the Wiltshire Core Strategy sets out that all development is required to demonstrate high quality design with regard to built form and materiality, and should enhance local distinctiveness by respecting landscape and historic features, while protecting views and biodiversity. Developments must also maximise sustainability in construction and operation, result in efficient land use, demonstrate compatibility with surrounding buildings, and safeguard the wellbeing and amenity of occupants and neighbours. The Wiltshire Design Guide (2024) establishes further design principles for consideration for design of new development.

9.2 The accompanying Design and Access Statement and accompanying plans prepared by Pegasus outline the design of the proposed development in detail. Key design features are considered below.

Layout, Scale and Massing

9.3 The layout has been informed by the comments made by WC and the Inspector in relation to the Hallam Land scheme and following consultation with Historic England in May 2025, and in consideration of the site's setting and constraints. As such, the proposal focusses the development of all buildings in the north-western corner of the site, with the two southern fields free from built form, retaining a north-south visual corridor to retain key views between Bishopstrow Conservation Area and Battlesbury Hillfort.

9.4 The southern area of the site is reserved as public open space with the introduction of a drainage basin in this area. A development free corridor would be retained along the eastern boundary of the site and through the centre where the northern and southern parcels meet, retaining the open visual and physical relationship between the site and Grade II Listed Bishopstrow House Hotel, as outlined in Section 7 and the accompanying Heritage Impact Assessment.

9.5 The development of residential units along the north-western boundary provides a logical extension to Warminster, with the residential density equating to 29.7 dwellings per hectare, whilst maintaining efficient use of land in accordance with Part vi of Core Policy 57. The proposed internal access arrangement runs through the southern fields and serves the proposed residential development in the north of the Site, following a logical pattern with a mixture of tarmac and paving surface finishes.

9.6 The proposed residential units would be a mix of 1 (garages) and 2 storey buildings (main dwellings), as demonstrated by the Site Layout Plan (ref. P22-1991 _DE_02_M_03).

9.7 Stepping has been introduced along the northern and southern elevations of the buildings to add visual interest. This also provides dual aspect apartments in the corners of buildings (2-bedroom units), improving residential amenity.

Design and Appearance

- 9.8 The proposed development includes high quality-built design, materials and boundary treatments as shown on the submitted details. It aims to deliver homes with a contemporary architectural design and materials palette in keeping with the character of Warminster.
- 9.9 15 individual high-quality house types are proposed across the total of 135 new homes. These house types have been carefully selected to foster a sense of place within the development and to remain in keeping with the surrounding context. Dwellings will feature the following façade treatments:
- Marshalls Dymock Bronze Brick;
 - Marshalls Dewstone Wren Brick;
 - Parex Rendr Sany Earth; or,
 - Beckstone Golden tumbled Recon Stone.
- 9.10 Roof Tiles will be Slate grey or Red, with varying screen wall materials and distinguishing features, such as chimney placement and quoining, to be dispersed for visual interest. The high-quality materiality is dispersed throughout the scheme as identified in the Material Strategy (ref. P22-1991 -DE-02—06).
- 9.11 Street scene drawings (ref. P22-1991-DE-04) are also submitted , indicating how character and interest is achieved through the range of built form, roof and elevation treatments proposed.

Landscaping and Open Space

- 9.12 Comprehensive landscaping provision is proposed. Currently, the fields are private and cannot be enjoyed by the public. However, as a result of the development, the southern, undeveloped portion of the site will be opened for public access. The scheme would link into the existing PROW network and provide access across the Site for pedestrians, including to the provided public open space, which would include the re-opening of the historic pedestrian access in the south west of the site (plus deliver associated repair works to the boundary wall). The scheme is over 50% open space (c. 5.9ha) which represents a significant opportunity to deliver enhancements to biodiversity and provide substantial space for local recreation.
- 9.13 The wider Site will benefit from extensive tree planting (231 trees) and soft landscaping measures including planting of grass turf, amenity grassland, native shrubs, wildflower meadow and wet meadows, along with trees delineating along proposed internal roads. Full details of proposed landscaping provision are indicated on the submitted landscaping drawings (ref. P22-1991_EN_05B).
- 9.14 The Landscape Plan also incorporates Locally Equipped Areas for Play for the benefit of all future residents and site users.

Amenity

- 9.15 The proposed development has considered the amenity of neighbouring residential properties throughout the design process.
- 9.16 Where the proposed dwellings share a rear interface with dwellings at The Dene, a 5m buffer has been retained between the existing hedgerow boundary and the proposed rear garden boundaries, to be managed by a management company as secured by a S106. This buffer retains a substantial separation distance between the proposed and existing dwellings to retain a sense of privacy and limit any sense of overlooking or noise. A buffer has also been retained between dwellings at Home Farm, with some tree planting between the dwellings and proposed access road to enhance visual screening for the proposed dwellings.
- 9.17 The proposed building heights have been retained at two storeys and a distance of circa 20m has been maintained between proposed dwellings and neighbouring dwellings at The Dene. Alongside tree planting, this will ensure no detrimental impacts on the amenity of residents in existing properties. to reduce any inappropriate massing that may contribute to a feeling of over-crowding or imposing structures for existing dwellings at The Dene.
- 9.18 The proposed lighting strategy includes the use of bollard lighting on the estate road access to minimise impacts of new lighting for any guests of the Bishopstrow House Hotel. The lighting will also be directional, minimising light pollution.
- 9.19 Consideration has been given to the amenity of local residents, and the proposed buffers, landscape strategy and provision of recreational spaces accord with the requirements of Core Policy 57.

Summary

- 9.20 The proposed development has been designed to a high quality to ensure the enjoyed experience of both future residents and existing neighbours of the site. The proposed layout of the development is of an appropriate scale and density, and the amenity of existing residents is preserved. Landscape, Heritage, Biodiversity and sustainability have been incorporated into the design, as outlined throughout this Planning and Affordable Housing Statement. The proposed development therefore accords with WCS Policy 57.

10.0 Flood Risk and Drainage

- 10.1 CS Policy 67 states that all new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground unless site or environmental conditions make these measures unsuitable.
- 10.2 The accompanying Flood Risk Assessment (FRA) prepared by Ardent sets out the flood risk of the site and provides full detail of the proposed Drainage Strategy features.

Surface Water

- 10.3 As outlined in Section 2, the site is located within fluvial flood risk zone 1. There are no areas of surface water flood risk identified in the area of the site proposed for access/residential development. The site is located within an area at risk of groundwater flooding, as identified in Wiltshire's SFRA, with a possibility of groundwater emerging at the surface locally (medium groundwater flood risk). The proposed access is located in an area of high groundwater flood risk.
- 10.4 Site investigations have been undertaken to assess the groundwater flood risk within the site, and to determine that the use of infiltration devices is viable within a drainage strategy. The results are outlined within the accompanying Ground Investigation Report prepared by Wilson Associates. Groundwater flood risk is accommodated through the raising of residential units above the surface water flood risk level.
- 10.5 Surface water drainage systems are proposed to accommodate the 100 year +45% climate change storm events. Run-off is proposed to discharge to the ground via nitration.
- 10.6 Infiltration swales are proposed as a form of Sustainable Drainage Systems (SuDS), which are incorporated into the surface water network. The proposed swales drain into two attenuation basins towards the south of the site, as identified in the Drainage Strategy (ref. 2204791-ACE-XX-XX-DR-C-0601-B Sheets 1 and 2). Infiltration testing has been completed in the location of the attenuation basin, identifying a suitable discharge rate of 1.42×10^{-5} m/s.
- 10.7 The proposed development accommodates the requirements of WCS Policy 67.

Sequential Test

- 10.8 The aim of the sequential test is to 'steer new development to areas with the lowest risk of flooding from any source,' (NPPF para 174). Paragraph 175 states that the sequential test is to be used in areas:
- "known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."*
- 10.9 Paragraph ref. 027 Reference ID: 7-027-20220825 of the Planning Practice Guidance (17 September 2025) outlines that the sequential test should be applied 'proportionately,' setting out that:

“Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.”

- 10.10 The proposed development is suitably located outside fluvial flood zones 2 and 3, and surface water flood risk is mitigated by design, as demonstrated in the accompanying FRA, in accordance with Planning Practice Guidance. As identified in paragraph 10.3, the site is identified within Wiltshire’s SFRA as being within an area of medium groundwater flood risk, where there is a possibility of groundwater flooding. On this basis, the application is accompanied by a Sequential Test prepared by DPP Planning, which accord with the relevant requirements of the NPPF and NPPG (ref. 6876CA).
- 10.11 The Sequential Test identifies 126 sites within Wiltshire capable of delivering a similar scope of development. Following filtering based on designations (e.g. National Landscape), flood risk and other factors identified at pages 23 and 24 of the accompanying Sequential Test, no reasonably available lower-risk alternative sites are identified. The Sequential Test is therefore passed.

Foul Drainage

- 10.12 The proposed Foul Drainage Strategy accommodates a peak foul flow rate of 6.3 l/s. Water flows are proposed to be collected from dwellings and conveyed via a gravity sewer network toward the identified connection to the Wessex Water foul sewer at Boreham Road.
- 10.13 Wessex Water have confirmed capacity for connection (FRA Appendix I). Connection is proposed to be secured via the S106 agreement.

Summary

- 10.14 The proposed development suitably accommodates all surface and foul drainage through a comprehensive drainage strategy. The proposal is supported by an agreed connection for foul sewage with Wessex Water. Sustainable Drainage features have been suitably identified to control surface water run-off. Groundwater emergence risk is accommodated through raising of the proposed dwellings. The proposed development accords with WCS Policy 67 and Chapter 14 of the NPPF.

11.0 **Transport and Movement**

- 11.1 CS Policies 60 and 61 seek to help reduce the need to travel particularly by private car by encouraging the sustainable, safe and efficient movement of people in Wiltshire. It looks to achieve this by:
- developing in accessible locations;
 - promoting sustainable transport alternatives;
 - maintaining and selectively improving the local transport network; and,
 - promoting demand management measures.
- 11.2 CS Policy 62 requires developments to provide appropriate mitigation measures to offset any adverse impacts on the transport network at both construction and operation stages.
- 11.3 CS Policy 64 encourages demand management measures where appropriate to reduce reliance on the car and encourage sustainable transport alternatives including residential parking standards based on minimum parking standards.
- 11.4 A Transport Assessment and Travel Plan, prepared by Ardent, accompany this application, and full details of the transport and access strategy can be found in these documents; a summary is provided below. The proposed active travel and vehicular access layouts are also shown on submitted drawing refs. 2204791-ACE-XX-XX-DR-C-0507F and P22-1991_DE_02_B_15 XXX.
- 11.5 Overall, the transport assessment (TA) concludes that:
- The proposed development would result in a maximum increase of 136 trips by car in peak hours;
 - The proposed development would not result in unacceptable impact on highway safety;
 - The impacts of the development on the road network are not severe and in highways terms are acceptable;
 - The proposed vehicular access is considered suitable by the Local Highway Authority;
 - The site is well served by local bus routes, and is within a 34 minute walk or 9 minute cycle of the local train station;
 - The proposed site layout accommodates several improvements to pedestrian connectivity between existing rights of way.

Access

Vehicular

- 11.6 Vehicular access is proposed via improvements to the existing access to Home Farm/Bishopstrow Court off Boreham Road. A meandering estate drive is proposed to link the proposed homes to Boreham Road.
- 11.7 The proposed access requires the removal of a section of the Boreham Road boundary wall located to the south of the site (albeit a reduced extent to that proposed under the previous

Hallam Land application, where a new/separate access was proposed). This facilitates the enlargement of the access, accommodating suitable visibility-splays (Drawing ref. 2204791-ACE-XX-XX-DR-C-0507D), and improved access to Bishopstrow Court/Home Farm.

- 11.8 The proposed vehicular access arrangements have been agreed in principle with Wiltshire Council as the Local Highways Authority through pre-application consultation. Boundary wall removal has been kept to the absolute minimum reflective of the need minimise heritage impacts whilst also creating a safe access. The proposal has been discussed with Historic England.

Pedestrian access

- 11.9 Pavements will be provided alongside the vehicular access, and is further enhanced by the restoration of the existing opening in the Boreham Road Boundary wall at the south-west site boundary (currently boarded up and unsafe) and provision of meandering pedestrian footways through the open space to join the main access in the heart of the site. New pedestrian connections are also proposed to nearby PRoWs, as identified in the Movement Strategy (ref. P22-1991_DE_02__10).

Parking

- 11.10 Each proposed dwelling is served by suitable car parking spaces as required by the “*Wiltshire Local Transport Plan 2011-2026: Car Parking Strategy*” (March 2011) (the ‘Transport Plan’) and as summarised in the table below and as illustrated in the accompanying Parking Strategy (ref. P22-1991_DE_02__05). A total of 28 guest car parking spaces are proposed, in excess of the 0.2 guest spaces provided required per dwelling (which would require 27 spaces) by the Transport Plan. EV Charging is proposed in accordance with building regulations.

Table 11.1

Number of Beds	Parking Spaces per Dwelling
1-bed	1
2-bed	2
3-bed	2
4-bed	3
5-bed	3

- 11.11 Cycle parking is proposed in line with the requirements of the Transport Plan and in accordance with Core Policy 61, providing:
- 1 covered space per bedroom for up to 3-bedroom dwellings;
 - 3 covered spaces per unit for 4-bedroom dwellings;
 - 4 covered spaces per unit for 5-bedroom dwellings; and,
 - 1 visitor space per 20 bedrooms.

- 11.12 Long-stay cycle parking is provided in garages and rear gardens of dwellings, with short-stay cycle parking provided in the public realm in the form of Sheffield stands (27 spaces total).

Travel Plan

- 11.13 A Residential Travel Plan prepared by Ardent Consulting Engineers has been prepared to encourage use of sustainable transport modes following completion of the development.

- 11.14 The Travel Plan outlines the implementation of the below measures:

- 1 Appointment of a Travel Plan Co-ordinator;
- 2 Provision of Travel Information Packs for future residents;
- 3 Promotion of walking and cycling measures within welcome packs;
- 4 Provision of travel information on an ongoing basis for future residents; and,
- 5 Provision of information regarding car share/car club bays in the local area.

- 11.15 These measures would be secured and funded by a mechanism established within the S106 Agreement.

Summary

- 11.16 The proposed development is sustainably located, and incorporates measures to improve pedestrian and cycle connectivity, including the provision of a large area of public open space and recreational footways. Safe and suitable access is provided for vehicles and pedestrians, as agreed with the Local Highway Authority, with minimal no material impacts on the local traffic. The proposed Travel Plan will encourage use of sustainable modes of transport.

- 11.17 In summary, the proposed development accords with WCS Policies 60 and 61, and paragraphs 117 and 118 of the NPPF. The Site can be safely accessed by all modes and will not result in impacts upon the local or strategic highway network subject to the delivery of the mitigation proposed.

12.0 Ecology, Arboriculture and Lighting

Ecology and Biodiversity

- 12.1 CS Policy 50 sets out that proposals must demonstrate how they protect features of nature conservation and geological value and that there is an expectation that such features should be retained, buffered and managed favourably in order to maintain ecological value, connectivity and functionality in the long-term. Further, all development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.
- 12.2 Major development must include measures to deliver biodiversity gains through restoring, enhancing and creating habitats. EPR has undertaken various surveys on site which have informed the Ecological Appraisal (EA) identifying:
- The existing habitat baseline;
 - Potential for ecological constraints, including protected species;
 - Impacts on local designations; and
 - Mitigation, compensation measures and enhancement opportunities for ecology and biodiversity net gain.

Surveys

- 12.3 EPR's desk and field-based baseline investigations have identified that no statutory or non-statutory designations would be materially affected by the proposed development. Notwithstanding this, phase 2 surveys were undertaken relating to the following species:
- 1 Breeding Birds;
 - 2 Bats;
 - 3 Badgers;
 - 4 Amphibians;
 - 5 Reptile Survey (including Grass Snakes); and,
- 12.4 The results of the surveys found that:
- 1 53 species of Breeding Bird were identified on site and in the local vicinity. One legally protected species was identified in the environs, but was not located seen on site (the Red Kite). The breeding bird assemblage was considered to be of Local-District level importance. There may be disturbance to nesting birds through loss of hedgerow, nesting and foraging habitat;
 - 2 Development may cause disturbance for foraging and commuting bat habitat, though no bat roosts were found on site. Six bat species were recorded across night-time walkover surveys between April-September (Noctule, Common and Soprano Pipistrelle, Myotis sp., Serotine and Nycatalus sp.). Static bat detector surveys identified 14 species (see EcIA para 3.66) between July to October. The Site was assessed to have only a small number of habitats that are suitable for bats. No

commuting routes were identified, though hedgerows and treelines around the site were identified as slight paths;

- 3 A Badger latrine was identified in February 2023. No setts were identified. One mammal track was identified in the southeast of the site. An April 2025 survey found no setts on or adjacent to the site, with one mammal track considered to be used by Badger found crossing the southeastern track into the Site from Bishopstrow House Hotel.
- 4 No ponds are within the site, and the nearest pond (85m south) was unable to be assessed, however had a history of no positive results for Great Crested Newt habitat in previous surveys. Toad habitat is present on site and is considered likely to support this protected species;
- 5 Grass Snakes, the Common Lizard and Slow Worm were identified on site. There may be injury or death for reptile species as a result of site clearance and loss of habitat without mitigation.

Mitigation

- 12.5 Responding to these elements and the on-site surveys, mitigation features have been included in the design to reduce any impacts on the key ecological features. These include:
- Retention and enhancement of hedgerows and associated bat-suitable habitat;
 - Implementation of a Construction Environmental Management Plan for protection of breeding birds, reptiles and bat species;
 - Completion of a bat-sensitive Lighting Strategy (ref. WLC1413-1300-002_R3 and WLC1413-1300-001_R3);
 - Planting of grassland and habitat suitable for reptiles;
 - Inclusion of one swift brick per dwelling for breeding birds;
 - Contributions to the Wiltshire Council strategic mitigation schemes with regards to the River Avon SAC and Salisbury Plan SAC and SPA.
- 12.6 The accompanying EcIA outlines that there are no significant effects for any of the identified species following the implementation of the mitigation measures outlined above. The proposed development accords with the requirements of Policy 50 of the CS.

Biodiversity Net Gain

- 12.7 The Environment Act 2021 requires all new development to demonstrate a 10% biodiversity net gain. The Planning Practice Guidance (Paragraph: 006 Reference ID: 74-006-20240214) sets out that plan-makers should not seek a higher percentage of BNG than the statutorily set 10% on an area-wide basis or for individual developments unless justified.
- 12.8 A Biodiversity Net Gain (BNG) Assessment accompanies the planning application. This confirms that the site is more than capable of delivering +10% BNG. Detailed calculations, based upon the detailed landscaping proposals, demonstrate that the site achieves a net gain of +9.95 habitat units (+38.37%), +5.94 hedgerow units(+62.79%), significantly and materially exceeding the 10% requirement in all areas. This is a significant benefit, to be given **moderate to substantial weight in the planning balance**.

- 12.9 A Habitat Management and Monitoring Plan (HMMP) will be required by condition, to secure BNG habitats for a period of at least 30-years.

Arboriculture

- 12.10 An Arboricultural Impact Assessment (AIA) prepared by Aspect Arboriculture outlines the impacts of the proposed development on trees. The accompanying Landscape Masterplan (ref. P22-1991_EN_05B) outlines tree and hedgerow planting as part of the development.
- 12.11 This proposal has taken a careful approach to ensure that most trees and hedgerow are retained. It also proposes the planting of 231 new trees and additional hedgerow, which has achieved benefits for biodiversity, residential amenity and landscape impacts. Unfortunately it has not been possible to retain all trees; 5 will need to be removed along with short sections of hedgerow. Of the 5 trees to be felled, 2 are of low quality (Cat C), and 2 need removing because they are dead or dying (Cat U). 1 tree to be removed is of moderate quality, though cannot be retained due to location within the developable area of the site. Where hedgerow is removed, this is to facilitate access surrounding the proposed residential area of the site. The minimum quantity of hedgerow has been removed to allow safe highway movements.
- 12.12 Mitigation for the tree and hedgerow loss is proposed through the substantial planting of additional trees, and through hedgerow enhancement. This is identified on drawing refs. P22-1991_EN_05, 06 and 07 prepared by Pegasus.
- 12.13 Trees of importance, including veteran Ash trees located south-east of the proposed development area, are proposed to be protected through the construction period. A tree protection plan identifies (Appendix C of the AIA) the root protection areas and proposed identified trees of importance, which have been considered in the design of all elements of the proposal. An Arboricultural Method Statement is proposed to be prepared under condition following determination of the application. This detailed arboricultural information has directly informed the layout and detailed design of the proposed development, ensuring the proposed houses and associated infrastructure avoid trees of importance on site, protecting their long term viability.
- 12.14 Substantial tree and hedgerow planting should be afforded **moderate weight in the planning balance**. The loss of one Category B tree should be weighed against the benefits of the proposal in the planning balance.

Lighting

- 12.15 A Lighting Design Considerations and Environmental Report has been prepared by William Lighting Consultants Ltd, in close consultation with EPR ecology, in response to the presence of Bat species on site. The Proposed Lighting Strategy (drawings refs. WLC1413-1300-001_Ro and WLC1413-1300-002_Ro) has been prepared to reduce lighting at the site boundaries, where bat activity is primarily located, and to accommodate light shielding where siting near identified bat habitat is unavoidable.
- 12.16 Visual impacts of lighting on local designated sites (e.g. the Salisbury Plains SSSI and SPA) have also been considered. Visualisations have been prepared and reviewed within the

accompanying LVIA (Appendix 4), identifying lack of impact on the dark skies in line with Core Policy 57 and Core Policy 51.

- 12.17 Lighting has been incorporated into the scheme only where required, and responds to and accommodates the requirements established by the presence of bat species surrounding the site.

13.0 Sustainability and climate change

- 13.1 CS Policy 41 sets out that new development is encouraged to incorporate design measures to reduce energy demand and that development should be well insulated and designed to take advantage of natural light and heat as well as use natural air movement for ventilation. The Policy states that in all cases the impact of these requirements on the viability of development will be taken into consideration.
- 13.2 The proposed development incorporates a series of sustainability measures as outlined in the accompanying Sustainability Report prepared by AES Sustainability Consultants. At the outset, this proposal is energy efficient, future proofed and exceeds the standards established in Policy 41 of the Core Strategy. AES outline fundamental considerations of Part L of the Building Regulations, and of the proposed Future Homes Standards. The proposed development has been prepared with a Fabric First approach with regards to Energy Reduction, prioritising sustainable methods for energy and heat generation. The Sustainability Report outlines that the development will:
- 1 Provide PV panels for supplementing gas boilers for heating systems;
 - 2 Comply with Part L baseline CO₂ emissions for all house types;
 - 3 Accommodate PV panels for supplementing gas boilers for heating systems;
 - 4 Accommodate the Future Homes Standards provision of air source heat pumps on plots where this is required, supplemented by PV Panels;
 - 5 Provide cross-ventilation where possible to avoid overheating risk;
 - 6 Not exceed water usage of 110/litres/person/day; and,
 - 7 Provision of EV charging for all homes, and provide EV charging for 50% of communal parking spaces.
- 13.3 A Waste Report has been prepared by Turley, which sets out that during construction, 95% of non-hazardous excavation waste and 80% of non-hazardous construction waste will be diverted from landfill. The waste hierarchy will be adhered to for management of waste, and monitoring, management and implementation of the proposed measures will be secured via a Construction and Environmental management Plan.
- 13.4 In consideration of the measures outlined above, the proposed development accords with WCS Policy 41.

14.0 Other environmental matters

Noise and Air Quality

- 14.1 Saved Policy NE18 of the North Wiltshire Local Plan states that development is only permitted where it would not generate harm upon public health or cause pollution to the environment. CS Policy 55 provides a list of potential measures that can be used to effectively mitigate emission levels in order to protect public health, environmental quality and amenity.

Noise

- 14.2 A Noise Assessment (NA) has been prepared by Ardent Consulting Engineers. It outlines that environmental noise surveys were conducted in October 2025, which identified average ambient sound level of 60 dB $L_{Aeq, T}$ adjacent to Boreham Road during the day and 50 dB $L_{Aeq, T}$ at night. To the north of the site, ambient sound levels were an average of 40 dB $L_{Aeq, T}$ during the day and 33 dB $L_{Aeq, T}$ during the night.
- 14.3 The NA modelling assesses that areas at the southern boundary of the site would be considered low risk to increases in noise as a result of the development. The central and northern areas are considered to have negligible risk during the day and night.

Air Quality

- 14.4 An Air Quality Assessment (AQA) has been undertaken by Ardent Consulting Engineers with regards to assessing the impacts of the construction and operation phased of the proposed development on Air Quality.
- 14.5 During construction there is potential for levels of dust as a result of groundworks that may have impacts for pollution and neighbouring amenity. Bellway is committed to ensuring that this is managed and the following measures will be included in the CEMP, which can be conditioned. The AQA identifies a series of mitigation measures (appendix C of the AQA) for implementation during construction to mitigate any impacts on air quality, including:
- 1 Preparation of a stakeholder communication plan, including community engagement;
 - 2 Available contact details displayed during construction for details of Air Quality manager;
 - 3 Prepare a Dust Management Plan (DMP) for approval by the Local Authority;
 - 4 Record and monitor all exceptional dust incidents;
 - 5 Regular site inspections to ensure compliance with DMP; and,
 - 6 Plan the site construction layout and machinery to ensure dust causing activities are located away from nearby receptors, as far as possible.
- 14.6 The impacts during operation are solely resultant of road traffic emissions. These are not significant, and are unlikely to result in pollution concentrations above baseline Air Quality Assessment Levels.

Summary

- 14.7 The proposed development has been prepared in consideration of impacts on noise and air quality. Sufficient mitigation has been proposed during construction and operation to ensure that the proposed development will not cause damage to public health. The proposal is in accordance with Saved Policy NE18 of the North Wiltshire Local Plan and Policy 55 of the CS.

Waste

- 14.8 Policy WCS6 of the Wiltshire and Swindon Waste Core Strategy (2009) states that development providing 10 or more dwellings will be expected to design and provide facilities for occupiers to recycle and compost waste. Wiltshire Council's 'Waste Storage and collection: guidance for Developers' Supplementary Planning Document (SPD) (January 2017) outlines the parameters for design of waste strategies and outlines required contributions for new residential development.
- 14.9 The accompanying Refuse Strategy (ref. P22-1991_DE_02__08) outlines bin collection points for the collection of waste from the proposed development, designed in accordance with the parameters of the Wiltshire Waste Core Strategy.
- 14.10 The Applicant will provide a financial contribution on a per dwelling basis for the provision of bins to facilitate the operation of the proposed development. This contribution will be secured via a S106 agreement.
- 14.11 The accompanying Waste Audit Statement sets out that suitable space for separation, storage and collection of recyclable and non-recyclable waste will be
- 14.12 The proposed development accords with Policy WCS6 of the Wiltshire and Swindon Waste Core Strategy and follows the guidance of the "Wiltshire Waste Storage and Collection: Guidance for developers" SPD.

Nutrient Neutrality

- 14.13 The Conservation of Habitats and Species Regulations 2017 (as amended) (The Habitat Regulations) outline the requirement for development to be nutrient neutral. Natural England's 'Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites' (2022) outlines how development can seek to be nutrient neutral.
- 14.14 The proposed development is sited within the nutrient catchment of the River Wylfe, which forms part of the Hampshire and Avon catchment, and the wastewater catchment of the Warminster Wastewater Treatment Works (WWTW). The proposal must demonstrate that it mitigates for any additional nutrient load as a result of the development, specifically Phosphorous.
- 14.15 The accompanying Nutrient Neutrality Statement (NNS) sets out that the proposed development would result in an increase in phosphorus discharge of 5.76 kg TP/yr. WWTW has a current permit level of 0.50 mg TP/litre, which will reduce to 0.25 mg TP/litre post-2030.

- 14.16 The NNS sets out that the proposed development will achieve nutrient neutrality by:
- Connecting 2 dwellings at home farm to the foul sewer, removing their requirement for a septic tank (reducing nutrient load);
 - Including a surface water treatment train through inclusion of swales followed by sediment forebays within the surface water drainage strategy, resulting in a 46.7% reduction in phosphorus; and,
 - Purchase of offsite mitigation credits via Wiltshire Council Strategic Mitigation Scheme (as a draft allocation within the Warminster Neighbourhood Plan), or via the Environment Bank, to be secured via S106 or condition.
- 14.17 The proposed development would therefore be nutrient neutral and comply with the Habitat Regulations.

15.0 CIL, S106 and Conditions

15.1 CS Policy 3 states that all new development will be required to provide for necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal.

15.2 The proposed development would contribute to the delivery of housing in Warminster as well as providing improvements to community infrastructure through the Community Infrastructure Levy and through developer contributions.

CIL

15.3 The CIL Charging Schedule was approved and came into effect in May 2015 and includes rates to be charged on new residential development. The rate for residential development within Warminster is £55 per sqm (and is index linked). A CIL form accompanies this application.

S106 Heads of Terms

15.4 In accordance with section 122 of the Community Infrastructure Levy Regulations 2010 (as amended) which came into effect on 6 April 2010, planning obligations should only be sought where they are:

- 1 Necessary to make the development acceptable in planning terms;
- 2 Directly related to the development; and
- 3 Fairly and reasonably related in scale and kind to the development.

15.5 At this stage, without prejudice, the following list provides suggested Head of Terms to be discussed and agreed with Wiltshire Council:

- Provision of Affordable Housing;
- Implementation of Travel Plan Measures;
- Delivery, Maintenance and Management of Open Space;
- Biodiversity Net Gain;
- Foul Drainage Connection;
- Any Highways Works Contributions; and
- Nutrient Neutrality (purchase of off-site credits).

15.6 Any required Highway works will be secured via a Section 278 Agreement.

15.7 The above summarises what we consider to be the scope of obligations required in relation to the Proposed Development. However, Bellway reserves its position on viability until such a time as these details are fully scoped, reflecting the mix of benefits being offered by the Proposed Development.

16.0 **Planning Balance and Conclusion**

- 16.1 This Planning and Affordable Housing Statement provides a comprehensive assessment of the Proposed Development of Land at Home Farm, Warminster. The proposed scheme has been subject to pre-application consultation and recent discussions relating to the emerging Warminster Neighbourhood Plan, the feedback from which has informed the proposals. The evidence submitted with this planning application demonstrates that this is a suitable, viable, deliverable and sustainable location for housing development. It is critical that the context to this proposal is the ongoing and substantial need for housing in Wiltshire, evidenced by the shortfall in 5-year supply and the recent evidence base to both the draft Local Plan and the draft Neighbourhood Plan.

The Development Plan

- 16.2 Assessed in the context of Section 38(6) of the Act, the development plan is out of date. The tilted balance at NPPF para 11 (d) confirms that WC should grant permission unless:
- 1 The application of policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or
 - 2 Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF as a whole.
- 16.3 A key issue to be weighed in the balance is NPPF para 215, which is engaged because of the less than substantial harm to the setting and significance of Grade II Listed Bishopstrow House and Bishopstrow Conservation Area. This requires a balance to be made with a view to establishing whether harm outweighs public benefits. In this balance, great weight should be afforded to the conservation of the asset (NPPF para 212).

The Public Benefits of the Proposal

- 16.4 This planning statement confirms that there will be a number of economic, social and environmental benefits including:
- 1 Delivering 135 new homes with a mix of sizes, types and tenures, deliverable within a 5-year period;
 - 2 The contribution towards affordable housing (40%, significantly exceeding current policy at 30%);
 - 3 Delivery of significant public open space (the site is currently private land) which makes use of the landscape features of the site, and incorporation of well-design walking and cycling routes – both via new routes and links into existing;
 - 4 Significant new tree and shrub planting;
 - 5 Provision of equipped children's play space and natural local areas of play;
 - 6 Provision of a scheme of ecological enhancement, with significant biodiversity net gain;
 - 7 Sustainable drainage system which mitigates existing on-site groundwater flood risk; and

- 8 Other economic benefits from the proposal arising from capital investment, construction employment and economic contributions of future residents.

16.5 When these benefits are considered together, they should be afforded very substantial weight.

The Heritage Balance

- 16.6 Section 7 and the accompanying HIA demonstrate that the proposal will lead to less than substantial harm to the setting and therefore significance of the Grade II Listed Bishopstrow House which is contrary to the provisions of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The HIA has demonstrated that the proposal would lead to less than substantial harm to the setting and therefore significance of Bishopstrow Conservation Area. As there would be no direct harm to the character or appearance of the Conservation Area, Section 72 of the Planning (Listed Buildings and Conservation Areas) 1990 Act is not engaged. In line with NPPF para 215 the low less than substantial harm to these heritage assets needs to be weighed against the public benefits of the scheme.
- 16.7 We acknowledge that great importance should be attributed to the significance of these assets but conclude that any harm is very clearly outweighed by the substantial benefits set out above that will arise from the proposed development. The proposed development would cause a low or very low level of harm to the significance of Home Farm, The Grange and the Boreham Road Boundary Wall. The very low/low degree of harm to these non-designated heritage assets, would be balanced against their significance, which is low, in accordance with NPPF Paragraph 216.
- 16.8 NPPF para 11 d (i) clearly states that for decision taking, where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, as is the case here, permission should be granted unless the application of policies in the NPPF that protect areas of particular importance provide a clear reason for refusal. As such, whilst there is a protectionist policy approach, it does not represent a clear reason for refusing planning permission given the benefits that will arise. In simple terms, the harm to the setting of listed buildings and the Schedule Monument should not be a reason for withholding planning permission.

The Tilted Balance

- 16.9 As set out above, the tilted balance in paragraph 11(d) of the NPPF is engaged, such that permission should be granted unless the policies in the NPPF provide a clear reason for refusal, or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 16.10 There are some impacts of the proposed development as discussed in this Planning Statement / supporting technical reports, including:
- 1 Some harm to the landscape because the existing greenfield site would be developed with houses. However, it is recognised by WC that greenfield sites need to be developed to meet future housing needs. Furthermore, the proposal will result in no significant landscape or visual effects post-development and where moderate or minor adverse impacts have been identified, these have been mitigated where possible. Further, there

are some major beneficial effects on the landscape, such as the enhancement to tree resource. As such, very little weight should be attributed to the landscape harm.

- 2 The impact on the setting of Bishopstrow House and Bishopstrow Conservation Area has been discussed above and we acknowledge that the harm must be given great weight. However, we conclude that the very substantial public benefits that have been identified outweigh the harm.

- 16.11 The following summarises the benefits arising from the proposed development, and the weight to be attributed.

Very Substantial Weight

- 1 A significant contribution to new housing in the area, providing up to 135 new homes with a mix of house sizes, types and tenures, deliverable within a 5-year period;
- 2 40% affordable housing, exceeding current policy requirements;

Substantial Weight

- 3 Extensive new, not previously accessible, public open space, with significant landscaping, tree planting and opportunities for leisure and recreation for new and existing residents, equating to approximately 40% of the total site area;

Moderate Weight

- 4 Enhancement to and new links into existing PRoWs, along with provision of new pedestrian and cycle routes;
- 5 A landscape and ecology scheme which delivers biodiversity net gain far exceeding the statutory 10%;
- 6 Significant economic benefits during both the construction and operational phases, including the creation of new jobs and contribution of additional GVA to the local economy.

- 16.12 There are also other wider benefits, which include a site-wide sustainable drainage system which mitigate existing on-site groundwater flood risk.

- 16.13 The tilted balance at NPPF para 11(d) applies and the very substantial public benefits that have been identified outweigh any harm, including the less than substantial harm to the significance of Bishopstrow House and Bishopstrow Conservation Area which has been afforded great weight. Therefore, the case for granting planning permission is clear; the proposed development is clearly acceptable in policy terms and should come forward without delay.

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