[redacted]

9 July 2026

Development Management
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

PLANNING REFERENCE	PL/2026/03375
PROPOSAL	Outline planning application for demolition of 5 and 6 Storridge Road and up to 165 dwellings, with public open space, landscaping, SuDS and access from Storridge Road. All matters reserved except access.

Dear Sir or Madam,

OBJECTION TO PL/2026/03375: LAND OFF STORRIDGE ROAD, WESTBURY

I am writing as a local resident to object to this application in the strongest possible terms. I recognise that Wiltshire needs more homes, including affordable homes. However, housing need does not make every field suitable for development and it does not remove the Council's duty to assess the particular planning harms of this site.

I have reviewed the submitted planning statement, appeal decision, noise assessment, transport assessment, flood risk and foul drainage documents, ecological material, socio-economic statement, Design and Access Statement and Statement of Community Involvement. This is the fourth application promoted by the same developer on this land. The three earlier applications were refused, and the appeal concerning up to 200 dwellings was dismissed after a public inquiry in August 2024. The present proposal reduces the maximum number of homes to 165 and pulls the built development farther from the West Wiltshire Trading Estate, but it does not remove the fundamental questions about the principle of development, the long-term relationship with the trading estate, sustainable access, drainage and infrastructure.

The applicant places heavy reliance on its claimed 2.42-year housing land supply and on the withdrawal of the emerging Local Plan Review. Those are material considerations, but they are not a blank cheque for speculative development. The previous Inspector applied the tilted balance with a 3.85-year supply and still dismissed the appeal because the adverse impacts significantly and demonstrably outweighed the benefits. The Council must carry out the same site-specific exercise now, rather than treating the housing supply position as an answer in itself.

Summary of my material planning objections

- The site remains outside the Westbury settlement boundary, unallocated and in the countryside in planning policy terms. The 2024 Inspector gave significant negative weight to the same conflict with Core Policies 1, 2 and 32 and the Wiltshire Housing Site Allocations Plan.

- The revised acoustic case depends on a precise layout, barrier block, room orientation, a 3 metre bund with a 3 metre screen and 1.8 metre screening to every private garden, although layout, scale, appearance and landscaping are reserved matters.
- The foul drainage analysis is visibly out of date. It still describes 200 dwellings, relies on Wessex Water correspondence from 2019 and uses an obsolete delivery timetable ending in 2026.
- The scheme is not well served by public transport. The Ham bus stops are not currently served and any return of buses depends on an unfunded and unprogrammed repair to the Station Road rail bridge, plus decisions by third parties.
- The transport model predicts arms at or above practical capacity and, in some cases, close to or above theoretical capacity. The key local junction would receive about 7 per cent more peak-hour traffic from this development alone.
- Surface water disposal depends on a positive outfall through an existing culvert system towards Biss Brook, with formal consent, legal rights, capacity, adoption and long-term maintenance still to be demonstrated.
- The application does not provide a current, deliverable response to pressure on schools, healthcare and other services. The draft Section 106 heads are broad and the socio-economic statement contains a material arithmetic error which overstates first-occupation spending.

1. The principle of development remains contrary to the adopted spatial strategy

The starting point is the adopted development plan. The applicant itself accepts that the site lies outside the defined settlement boundary for Westbury and is not allocated for housing. The Inspector who determined APP/Y3940/W/24/3340811 found that the land was therefore in the countryside in planning policy terms and that development conflicted with Core Policies 1, 2 and 32 of the Wiltshire Core Strategy and with the Wiltshire Housing Site Allocations Plan. He gave that conflict significant negative weight and concluded that the site was not an appropriate location for development of this type. Those findings were made about this land after a full public inquiry and remain highly relevant.

The applicant now describes the proposal as "essentially in-fill development" because there is existing or permitted development around the site. That description does not change its policy status. It remains a large greenfield extension beyond the settlement boundary. The permission at Glenmore Farm does not allocate this field, move the adopted boundary or turn the remaining countryside between existing areas into an automatic housing allocation.

The withdrawal of the Local Plan Review on 19 May 2026 makes the lack of an up-to-date replacement plan more serious, but it does not erase the adopted plan. Planning law still requires decisions to be made in accordance with the development plan unless material considerations indicate otherwise. The applicant's housing supply case is a material consideration and the tilted balance may be engaged, but the 2024 appeal demonstrates that the tilted balance is not an instruction to approve. At paragraph 135 the Inspector expressly rejected that approach and found that the harms significantly and demonstrably outweighed the benefits.

The reduction from 200 to 165 homes is relevant, but it is still a substantial, speculative development outside the boundary. A numerical reduction does not resolve the in-principle conflict. The Council should give full and careful weight to the Inspector's findings, rather than allowing repeated applications to wear down an objection which has already been tested at inquiry.

2. Noise, future living conditions and the agent of change principle are still fundamental

The previous appeal was not dismissed on a minor technical point. The Inspector found that the quality of accommodation would be unacceptable for a significant proportion of future residents and called this a "fundamental issue". He also found that it had not been satisfactorily demonstrated that the development

would avoid future risks to the operation of the West Wiltshire Trading Estate, which he recognised as a large and economically important employment area.

The new Noise Assessment seeks to answer that refusal by removing the northern housing area and relying on a very particular form of development. Its modelling assumes all of the following:

- a barrier block along the northern edge of the housing area;
- specific dwelling orientation and internal room layouts, with habitable rooms placed on quieter facades;
- a 3 metre earth bund topped by a 3 metre acoustic screen;
- 1.8 metre noise-screening fences or walls around every private garden; and
- one of three tested layout options, with Option 1 specifically developed to meet the targets and Options 2 and 3 testing changes to gaps and height in the barrier block.

This exposes a basic mismatch in the application. The proposal is in outline and all matters except access are reserved. The report itself says that details and drawings of the three layouts are to be provided outside the report. An outline permission for "up to 165 dwellings" does not, by itself, secure the tested arrangement, the number and position of gaps, building heights, internal room plans, quiet facades or long-term retention of the barrier block. These are not cosmetic details. They are the basis on which the consultant says the principal reason for dismissing the last appeal has been overcome.

The modelling also depends on survey work undertaken in August 2023. The long-term positions were monitored from 3 to 10 August and 25 to 31 August 2023, while the eastern position was measured for only about 20 minutes on 31 August. The report records wet periods and wind speeds above 10 mph, with one long period removed. A trading estate is dynamic. Businesses, machinery, operating hours and tenants can change. The Inspector previously found that interviews with current occupiers and assumptions about their expansion did not capture unrestricted future businesses or changes in company plans. That concern is not answered merely by relabelling a modelled uplift as a theoretical worst case.

The theoretical scenario is constructed by increasing noise until the consultant considers an adverse effect would begin at existing nearby dwellings. This is not the same as testing every reasonably foreseeable unrestricted use of the trading estate. The previous Inspector specifically explained that existing residents at Hawkeridge Park are not an equivalent constraint because future residents on the appeal site would be much nearer and could experience different effects, including tonality. He also noted that the statutory nuisance threshold is more severe than the lower thresholds used to protect ordinary residential amenity.

Even under the applicant's own theoretical scenario, the assessment predicts target exceedances in living rooms and bedrooms for all three layout options. Option 1 has six living rooms 0 to 1 dB above target, two living rooms 1 to 2 dB above target and four bedrooms 0 to 1 dB above target. The other options also contain exceedances. The consultant dismisses these as imperceptible and uses general internet comparisons with whispers, rustling leaves and libraries. That contextual material does not answer the planning question: whether it is appropriate to place a new residential neighbourhood beside an unrestricted strategic employment area when acceptable conditions depend on a highly engineered layout and permanent acoustic infrastructure.

The proposed bund and screen would have a combined height of 6 metres, and every private garden would require permanent 1.8 metre acoustic enclosure. These measures have visual, design, maintenance and replacement implications which are not fully assessed at this outline stage. If a screen deteriorates, is altered by a householder or is not replaced like-for-like, the acoustic assumptions may no longer hold. The management and enforcement mechanism is therefore central, not incidental.

For these reasons, I do not consider that the Council can safely conclude that the appeal reason has been overcome. At the very least, the Environmental Health Officer should commission or require an independent review of the acoustic evidence, current monitoring and future-use assumptions. Any acceptable scheme would need a binding parameter plan which fixes the tested acoustic layout, building heights, orientation,

quiet facades, room disposition, bund, screen, garden barriers and permanent maintenance arrangements before outline permission is granted. If those essential details cannot properly be fixed at this stage, the application should be refused.

3. The submitted foul drainage evidence is stale and is not a reliable basis for a 2026 decision

The Foul Drainage Analysis is one of the clearest weaknesses in the submission. Although included in a 2026 application, it is plainly a recycled document prepared around the previous 200-dwelling proposal. Its executive material still refers to development of up to 200 dwellings. Its programme refers to marketing the site in 2019, a sale in 2020, first occupations in 2021 or 2022 and full flows by 2026. That timetable is now impossible and demonstrates that the analysis has not been properly updated for the current application.

The capacity position relies principally on Wessex Water correspondence from May 2019 and earlier exchanges dating back to 2016. The 2019 view was based on the network and development circumstances then known. The local development picture has materially changed since that time, including permissions which the current Transport Assessment itself treats as committed development. I do not assert without evidence that every permitted scheme drains to the same pumping station, but that is exactly why a fresh, scheme-specific Wessex Water assessment is required. A seven-year-old response cannot establish present capacity for a new 165-home proposal.

The historic Wessex correspondence also identifies significant constraints which should not be deferred. These include numerous pipelines and services across the site, a required 15 metre clear stand-off from the Hawkeridge Park pumping station because of odour, noise and vibration, operational problems associated with rising mains, and the possibility that diversion would be restrictive. The current report says that detailed arrangements will be agreed later and indicates that an additional on-site pumping station may be needed for parts of the development.

Before determination, the Council should require an updated foul drainage strategy based on the 165-dwelling scheme, current survey information, current cumulative commitments and a new written response from Wessex Water. It should confirm actual network and pumping capacity, connection points, easements, stand-offs, any diversion works, emergency storage, access for maintenance, ownership, adoption and delivery. These are matters of whether the development can be serviced safely and lawfully, not details which should be left until after the principle has been granted.

4. The location remains car dependent and the public transport solution is speculative

The current Transport Assessment is more recent than the one submitted previously and I acknowledge that it now identifies the Glenmore Farm and Mane Way permissions as committed development. However, its own evidence shows that the site is poorly served by reliable public transport and that many everyday destinations are beyond convenient walking distance.

The stops on The Ham are not currently served because of the defective Station Road rail bridge. The operational stops identified in the assessment are generally about 944 to 1,097 metres from the site, with quoted walking times of roughly 12 to 14 minutes. Services are limited and the routes listed generally have no Sunday service. Westbury railway station is about 1,046 metres away, while Westbury Junior School is about 1,811 metres away, the Infant School about 1,960 metres, the nursery about 1,964 metres and the High Street about 2,058 metres away. The secondary school is beyond 2 kilometres and the assessment describes a walk of around 31 minutes.

The applicant suggests that the Station Road bridge might be repaired and that buses could then be rerouted past the site. It offers only to consider a proportionate contribution. There is no identified total cost, confirmed funding package, agreed programme, legal commitment from the bridge owner, highway authority or bus operators, or guarantee that a service will actually use The Ham after the work. A possibility controlled by several third parties cannot be counted as an existing or deliverable public transport benefit.

There is also a direct inconsistency within the submission. The Building for a Healthy Life table in the Design and Access Statement states that all homes would be within easy reach of a bus stop along The Ham, while the Transport Assessment accepts that The Ham stops are not currently served. The Council should judge the scheme on the services that are available and secured, not on an illustrative future scenario.

Many of the suggested cycle connections are recommended on-road routes rather than segregated infrastructure. For families with young children, older residents and less confident cyclists, that is not an equivalent alternative to convenient public transport. Given the distance to schools, shops, healthcare and much of the town centre, the realistic outcome is high private car use and demand for more than one car in many households. Parking provision and the exact housing layout are reserved, so the Council cannot yet test whether the scheme will accommodate that demand without pavement parking, verge parking or pressure on surrounding roads.

5. The cumulative highway evidence shows a network under strain

The Transport Assessment uses a single day of manual classified counts on Thursday 1 May 2025, covering the morning and evening peaks. A one-day survey is a limited basis for a development of this size, particularly where several junction models required adjustment because the initial modelled queues did not match the observed queues. The sensitivity of the results to survey-day conditions and calibration assumptions should be independently scrutinised.

The assessment predicts about 95 additional two-way vehicle trips in the morning peak and 94 in the evening peak. At The Ham, Station Road, Brook Lane and Storridge Road junction, this is an increase of about 6.9 per cent in the morning and 7.0 per cent in the evening, the largest local proportional impact identified. That is not an immaterial change for residents who use this junction every day.

The applicant's own capacity methodology says a Ratio of Flow to Capacity of 0.85 is the practical capacity threshold and 1.00 is the theoretical threshold. In the 2031 modelling, the Station Road arm at the key local junction reaches 0.90 in the morning peak with development. The West End arm at Station Road, West End and Haynes Road also reaches 0.90. At the Warminster Road and Haynes Road junction, the modelling shows the A350 Warminster Road arm at 0.97 in the morning and 1.15 in the evening with development, while Haynes Road reaches 0.90 in the morning. The detailed model output records long delays and queues on the most constrained arm.

The applicant repeatedly argues that this development adds only 0.01, 0.02 or 0.03 to some of those ratios and that background growth and committed development create more of the pressure. That does not make the additional traffic harmless. Cumulative assessment exists precisely because each new scheme adds to the same finite network. A junction already above practical capacity has no meaningful spare margin merely because the theoretical failure point has not yet been reached.

Upgraded pedestrian crossings may improve crossing control, but they do not create road capacity and may affect traffic progression at busy periods. The Council should require the highway authority to address the cumulative position openly, including the interaction of the new crossings, Station Road bridge restrictions, school traffic, industrial traffic and committed housing. A robust construction traffic management plan, routing plan and restrictions on HGV movements would also be essential because Storridge Road and The Ham are residential roads and the previous Inspector recognised temporary harm during construction.

6. Surface water disposal and existing drainage infrastructure are not yet sufficiently secured

The Flood Risk Assessment places the site in Flood Zone 1, but that is not the end of the drainage question. The site falls substantially from about 69 metres to 52 metres and the ground is considered unsuitable for infiltration. The proposed solution therefore depends on storing water on site and making a positive discharge at a restricted rate of 12.88 litres per second to an existing ditch and 225 mm culvert system which ultimately drains towards a tributary of Biss Brook.

The report describes the basin sizing and SuDS strategy as preliminary and confirms that formal land drainage consent will be required. It also anticipates adoption of principal drainage features by Wessex Water or another network operator, while some private SuDS features may be maintained by individual householders. The submission does not yet demonstrate final legal rights to use the complete outfall route, the current structural condition and hydraulic capacity of the receiving culvert, the terms of adoption, responsibility for clearance and repair, or a fully designed exceedance route if a blockage or event exceeds design capacity.

This is particularly important because several existing foul and water assets cross or project into the site, including rising mains, overflow infrastructure and the Hawkeridge Park pumping station. The relationship between those services, finished ground levels, the acoustic bund, roads, housing, the attenuation basin and access for maintenance must be demonstrated on one coordinated plan. The Council should not rely on separate consultants assuming that each element will fit at reserved matters.

I am not claiming that the proposal will inevitably flood. I am saying that the applicant has not yet proved that the proposed positive outfall is legally, physically and operationally deliverable for the lifetime of the development. The relevant consents, capacity confirmation, adoption route, management plan and protection of existing infrastructure should be resolved before outline permission, not left as an open-ended condition after the principle is established.

7. Local services are not assessed adequately and claimed benefits are overstated

The applicant estimates that the development could add about 383 residents. This would place additional demand on schools, GP services, roads, public transport, open space, waste services and other local infrastructure. Yet the application does not contain a current, detailed assessment of available school places or primary healthcare capacity tied to specific, deliverable projects. In the community consultation material, concerns about schools and GP provision are effectively described as matters outside the developer's scope, with reliance placed on future contributions.

The draft Section 106 heads of terms are not a substitute for that evidence. They identify 40 per cent affordable housing and general open-space obligations, with highway or public transport measures "as necessary" and other contributions to be identified later. There is no clear schedule of specific education or healthcare works, costs, delivery bodies or timescales. The previous Inspector gave no positive weight to a general healthcare contribution because it was not tied to identified works. The Council should not repeat that position by approving first and seeking a practical use for money afterwards.

There is also a material arithmetic error in the Socio-Economic Statement. It applies an estimated first-occupation expenditure of £7,700 to "383 new households" and reports a benefit of about £2.9 million. The scheme proposes up to 165 homes, not 383 households. At the applicant's own rate, the maximum calculation is £1,270,500. The statement has treated the predicted number of residents as though each resident were a separate household, overstating this claimed benefit by about £1.68 million. This should be corrected before any weight is attached to the figure.

Construction employment and household spending are real considerations, but much of the construction benefit is temporary and ordinary household spending is a generic consequence of almost any housing development. Council Tax and Section 106 or CIL payments are not free-standing benefits where they are required to mitigate the demands created by the new population. The appropriate question is whether the development leaves local infrastructure able to serve both existing and future residents. On the present evidence that has not been demonstrated.

8. Too much of the proposed solution is left to reserved matters

Only access is submitted for approval. Layout, scale, appearance and landscaping are reserved. The application therefore asks the Council to accept the principle and maximum quantum before it knows the

final number and mix of houses, exact building heights, parking layout, street form, relationship with existing homes, detailed SuDS, lighting, energy strategy or the acoustic design on which acceptability depends.

This is especially problematic because the claimed solution to noise is layout-specific, the ecology case relies on fixed dark corridors and buffers, and the drainage case relies on space for storage, utilities and maintenance. Each discipline is competing for the same land. A later reserved matters application cannot be allowed to trade away an acoustic gap, ecological buffer, service easement or basin capacity in order to fit the maximum housing number after outline consent has established an expectation of 165 homes.

The Design and Access Statement indicates a mix of two and three-storey buildings, but there is no binding height or storey parameter before the Council. The 6 metre acoustic structure would create a substantial engineered edge to the trading estate, while private gardens would be enclosed by acoustic fencing or walls. The combined effect on outlook, character, surveillance, permeability and the quality of the northern edge needs to be assessed as an actual design, not assumed from an illustrative framework plan.

The Sustainable Energy Statement also states expressly that there is no fixed energy or sustainability strategy at outline stage and that technologies may be installed where possible and appropriate at reserved matters. Aspirational references to solar panels, heat pumps and low-carbon design should therefore be given limited weight unless secured by measurable requirements.

9. Ecology, habitats mitigation and biodiversity gain must be secured without erosion

The ecological evidence is more current than in earlier applications and I do not suggest that ecology alone necessarily prevents all development. However, the Shadow Habitats Regulations Assessment identifies likely significant effects in the absence of mitigation, including recreational pressure and effects on bat habitat and dark corridors. Its conclusion depends on the proposed mitigation being fixed, funded, delivered and maintained.

The Ecological Impact Assessment relies on a full 30 metre northern buffer, including a 15 metre dark core and a 15 metre transition area, minimally lit corridors, a detailed lighting strategy, a Landscape and Ecological Management Plan and long-term management. The Biodiversity Net Gain material reports gains of 16.95 per cent for habitat units and 11.95 per cent for hedgerow units. Ten per cent is the statutory minimum, so the claimed excess should carry weight only if the same habitats, condition targets and 30-year management are legally secured.

The Council should ensure that reserved matters, acoustic earthworks, paths, lighting, drainage features, garden extensions, utility corridors and management access cannot reduce the dark buffer or the calculated biodiversity units. The required habitats mitigation, monitoring, funding, lighting limits and management organisation should be contained in enforceable conditions and the Section 106 agreement before permission is issued. General promises to deal with these matters later are not enough where the HRA conclusion depends on them.

10. Other evidence remains old or incomplete

The Phase 1 Geoenvironmental Assessment is dated May 2016, around ten years before this application. It identifies a low to medium contamination risk, possible external sources, historical quarrying, radon and ground-gas issues, and recommends Phase 2 intrusive work including trial pits, boreholes and gas monitoring. A condition may be suitable for ordinary verification work, but a decade-old desk study should not be treated as current evidence that no constraint exists, particularly beside an active industrial estate and where ground levels and drainage infrastructure are important to the design.

Taken together with the outdated foul drainage report and the deferred energy, acoustic, drainage and layout details, this reinforces the impression that the application seeks an outline principle first and intends to solve several interdependent constraints later. That is risky on a site which has already been refused

three times and dismissed at appeal because the quality of the proposed living environment was not acceptable.

11. Community involvement and the continuing Section 52 constraint

The Statement of Community Involvement records 21 online responses and three email responses to the developer's exercise. It records repeated concerns about traffic, infrastructure, schools, GP services, drainage, flooding, ecology and the trading estate. The responses did not lead to a fundamentally different development concept. Many answers simply refer to submitted assessments or possible future contributions. That exercise should not be presented as community support or as resolution of the concerns raised over several applications.

A Section 52 agreement continues to affect a substantial part of the land. I recognise that the previous Inspector gave it limited weight in the planning balance and that it is a separate legal matter rather than an automatic reason to refuse planning permission. However, the Inspector also recorded that it would have to be revoked before development could proceed. The Council should therefore state clearly, before any resolution to approve, the present status of that agreement, the land it affects, the process proposed for discharge and how the public interest will be considered. It should not be treated as an administrative detail after permission.

12. Conclusion and requested decision

The present application is a reduction and redesign of the previous proposal, not a removal of the site's fundamental constraints. The land remains outside the settlement boundary and unallocated. The acoustic case still depends on detailed design and permanent engineered mitigation which the outline application does not fix. Foul drainage relies on stale evidence, public transport relies on a speculative bridge and service solution, highway modelling shows cumulative pressure, and the surface water outfall and infrastructure arrangements are not fully secured. The claimed local benefits are not matched by a specific, deliverable plan for schools, healthcare and other services, and one of the headline spending figures is materially wrong.

Wiltshire Council must determine this application in the public interest and on the evidence before it, not on the repeated assertion that housing need overrides every other consideration. It does not. The 2024 Inspector applied the tilted balance and still concluded that the adverse effects of development on this site significantly and demonstrably outweighed the benefits. The revised application has not yet provided a sufficiently certain or robust basis for a different conclusion.

I therefore ask Wiltshire Council to refuse planning permission for PL/2026/03375.

If officers are nevertheless minded to recommend approval, I ask that the application is determined by the Strategic Planning Committee and that no permission is issued until the Council has, at minimum:

- obtained an independent and current acoustic review, with a binding parameter plan securing the tested layout, building form, room orientation, bund, screen, garden barriers and long-term maintenance;
- received a new Wessex Water capacity response and a current foul drainage strategy for 165 dwellings, including all pumping, easement, diversion, stand-off and adoption requirements;
- secured legal outfall rights, land drainage consent, receiving-culvert capacity, adoption, exceedance routes and funded long-term SuDS maintenance;
- identified a funded and legally deliverable public transport package rather than relying on a possible future bridge repair and possible rerouting of buses;
- published specific, evidenced education, healthcare, highways, habitats and open-space obligations in a completed Section 106 agreement; and

- secured the ecological buffers, lighting limits, habitats mitigation and 30-year Biodiversity Net Gain management on the same layout relied upon in the technical assessments.

Yours faithfully,

JOANNA BOHANA

Documents and decisions referred to

- Wiltshire Council application PL/2026/03375: Application Form and Cover Letter, May 2026.
- Gladman Developments Ltd, Planning and Affordable Housing Statement, May 2026, including Appendix 3: draft Section 106 Heads of Terms.
- Planning Inspectorate, Appeal Decision APP/Y3940/W/24/3340811, dated 30 August 2024.
- Sharps Acoustics LLP, Noise Assessment: Land Off Storridge Road, Westbury, April 2026.
- PJA, Transport Assessment: Land off Storridge Road, Westbury, 2026.
- Flood Risk Assessment: Land off Storridge Road, Westbury, April 2026.
- Foul Drainage Analysis submitted with PL/2026/03375, including Wessex Water correspondence dated principally 2016 to 2019.
- Ecological Impact Assessment, Shadow Habitats Regulations Assessment and Biodiversity Net Gain material submitted with PL/2026/03375.
- Socio-Economic Statement submitted with PL/2026/03375.
- Design and Access Statement and Sustainable Energy Statement submitted with PL/2026/03375.
- Statement of Community Involvement submitted with PL/2026/03375.
- Phase 1 Geoenvironmental Assessment, May 2016.
- Wiltshire Core Strategy, adopted January 2015; Wiltshire Housing Site Allocations Plan, adopted February 2020.
- National Planning Policy Framework, December 2024, as amended February 2025.