

MINUTES
of the Planning Advisory Committee
held on Monday 22nd November 2021 at 7.00pm
at
Warminster Civic Centre, Sambourne Road,
Warminster BA12 8LB

Membership:

Cllr Allensby (West)	*	Cllr Macdonald (East)	AB
Cllr Fraser (West)	*	Cllr Robbins (East)	*
Cllr Jeffries (North)	A	Cllr Syme (Broadway) Chairman	*
Cllr Keeble (West) Vice Chairman	*		

Key: * Present A Apologies AB Absent

In attendance:

Officers: Tom Dommert (Deputy Town Clerk), Judith Halls (Office Manager), Stuart Legg (Parks and Estate Manager) Stuart Atherton (Committees and Administration Clerk)

Wiltshire Council & Warminster Town Council: Cllr Parks.

Members of the public in attendance: 13.

PC/21/054 Apologies for Absence

Apologies were received and accepted from Cllr Jeffries.

PC/21/055 Declarations of Interest

No declarations of interest were received under Warminster Town Council's Code of Conduct issued in accordance with the Localism Act 2011.

PC/21/056 Minutes

PC/21/056.1 The minutes of the meeting held on Monday 18th October 2021 were approved as a true record and signed by the chairman.

PC/21/056.2 There were no matters arising from the minutes

Signed.....Date.....

PC/21/057 Chairman's Announcements

There were no Chairman's announcements.

PC/21/058 Questions

There were no questions submitted in advance by members of the committee.

Standing Orders were suspended at 7:05pm to allow for public participation

PC/21/059 Public Participation

6 members of the public spoke on planning application: PL/2021/09013 – Land west of Westbury Road.

Andrew Lee spoke in objection of the planning application - see attached notes

Dr A.D. Greig spoke in objection of the planning application - see attached notes

Ian Tinsley spoke in objection of the planning application - see attached notes

Len Turner spoke in objection of the planning application, particularly that it ignored the Neighbourhood Plan, which had been endorsed by the community of Warminster, and would increase problems with flooding.

Dr. Kim Porter spoke in objection of the planning application, saying that the proposed density was out of character for the area and existing homes, and it would adversely impact on the much loved nature reserve of Arn Hill and set a precedent for similar development.

Chris Marsh of Pegasus Group spoke in support of the planning application - see attached notes

Cllr Parks addressed the meeting. Cllr Parks is the Wiltshire Councillor for Warminster North and Rural. He explained he was unable to offer opinion or reach a decision regarding this application at this point as he also sits on the Wiltshire Council Western Area Planning Committee. He is also a Warminster Town Councillor although he does not sit on the Town Council's Planning Advisory Committee.

Cllr Parks requested that it was recorded in the minutes, that he spoke solely on behalf of Cllr Jeffries who was unable to attend the meeting. He reported that Cllr Jeffries opposed the Westbury Road application on the grounds that the site is outside of the Settlement Policy Boundary, the site falls within a flood zone, it would be entirely inappropriate for this location and it would also spoil the vista of that side of the town.

Standing Orders were reinstated at 7:27pm

PC/21/060 Reports from Unitary Authority Members

There were no reports from Unitary members.

Signed.....Date.....

PC/21/061 Planning Application

PL/2021/09013 Outline planning consent - some matters reserved. Erection of up to 205 no. dwellings, community hub, public open space, access, infrastructure and associated works, with all other matters reserved. Land West of Westbury Road, Land West of Westbury Road, Warminster.

Cllrs voted in objection to the application based on the following points:

- The proposed development is contrary to the national and local planning policy. The development sits outside the Settlement Policy Boundary.
- The proposed development is not in keeping with the stylistic context or scale of the local area.
- There is a protected verge that would be adversely affected by the development.
- There is great biodiversity in this area and protected species which would be adversely affected by the development.
- The proposed development will have a negative impact on the amenity of other residents by increasing the risk of flooding elsewhere in the town.
- The proposed development falls within flood zone 2 & 3. There will be a loss of water courses leading to increased flooding across Warminster, where the sewerage system currently struggles to cope. Wessex Water have already reported that there is a significant rise in water levels in the area. The recreational areas mentioned within the proposal are situated in the zone 3 areas. This would render them boggy and unusable at regular intervals.
- The development will cause traffic problems such as traffic generation, access and safety problems. There would be increased cross town traffic due to the need of access to services that sit on the opposite side of town, bringing gridlock to the already congested town centre.
- This development should not be permitted on land outside the Policy Settlement Boundary, as other land is available and allocated for housing in the area. Allowing it would create a dangerous precedent.
- The layout and density of the proposed development is inappropriate.
- The proposed development will adversely affect the vista of and from the hills which are a key cultural and heritage feature of Warminster.
- The type of housing proposed will not satisfy local housing needs. The 'affordable housing' proposed is beyond the reach of those in housing need.
- The development will increase phosphate levels and associated problems, particularly having an adverse impact on local rivers

Members also asked for Cllr Parks to 'call in' the application.

PL/221/09289 Lawful development: Existing use Lawful Development Certificate for use of Property as HMO 49 Woodcock Road Warminster BA12 9DG

It was resolved that there was no objection to the application.

Signed.....Date.....

PL/2021/09023 Proposed construction of a sewage pumping station, a rising main, gravity sewers and associated manholes. Land off Goodwin Close, Warminster, BA12 0DE

It was resolved that there was no objection to the application.

PL/2021/10497 Listed building consent (Alt/Ext) Single storey rear extension and replacement windows. 64 Victoria Road, Warminster, BA12 8HF

It was resolved that there was no objection to the application.

PL/2021/10263 Single storey rear extension and replacement windows
64 Victoria Road, Warminster, BA12 8HF

It was resolved that there was no objection to the application.

PC/21/062 Tree applications

PL/2021/10294 T1 - Ash tree - Fell due to signs of Ash Die back and cavities at base of tree. 11 Canons Close, Warminster, BA12 9LA

Members noted the application.

PL/2021/10380 T1 - Copper beech tree - fell-Infected by M. giganteus. Please refer to 1 Houghton Close Tree Report V1 (T8 of TPO W/87/00001/MIXED) The garden has heavy tree cover with a young, well established copper beech to the east of the garden. Suggest this would suffice as a replacement tree. 1 Houghton Close, Warminster, BA12 9QZ

Members noted the application.

PL/2021/10458 T1 Purple Beech Reduce the height by up to 3 metres Reduce lateral branches on 3 sides by up to 2 metres and the neighbours side by up to 1 metre General pruning to round over and balance the shape. 60 Boreham Road, Warminster, BA12 9JL

Members noted the application.

PC/21/063 Communications

Members resolved to issue a media release expressing opposition to PL/2021/09013, Erection of up to 205 no. dwellings, community hub, public open space, access, infrastructure and associated works, with all other matters reserved. Land West of Westbury Road, Land West of Westbury Road, Warminster. Cllr Syme was appointed spokesperson on this issue.

Meeting closed at 8:03pm

Next meeting 13th December 2021

Signed.....Date.....

Need or desire

Mr Chairman, councillors.

My name is Andrew Lee and I'm a resident of the Woodlands.

To consider this application we must distinguish between desire and need.

Desire is when a family are in a comfortable house and would like to move on to a slightly bigger house or perhaps to a different area, urban or rural, coastal or with maybe a view.

Need is when you are living in squalid rented accommodation. You have a young family. You need more space. You want to have security. A home of your own without being moved on every year by the landlord.

The difference matters because this application is for a rural site cultivated since the Iron Age

at the foot of Arn Hill in a sensitive landscape setting

It is beyond the settlement boundary – confirmed in 2020

National Planning Policy Framework 77 is clear:

In this setting - planning should respond to local need

That is need not desire.

It should be genuinely affordable housing (not with a capital A and H)

Market price housing is only allowed to finance affordable housing

This application may offer houses that respond to desires, it does not in any shape or form, respond to needs.

Why?

Barratt say they will be building 70% of homes to market price

In their literature they reference an average market price in Warminster of £318,000.

We know the average wage in this area is £27,800

Banks will not lend beyond 3 times salary

Lets do the maths.

Even with a generous deposit – say £40,000 an average local person could afford only £123,400

Compare that to £318,000 or even the £255,000 which would be the cost of Affordable Housing which would be the minority of the houses that Barratt say they will build. Affordable Housing, with a capital A and H, is meant to be priced at 20% below market housing.

In conclusion this application does not meet a genuine local housing need.

So it should be rejected for failing the tests of NPPF 77.

And because it is beyond the settlement boundary and in a rural setting and in a sensitive landscape setting too, I suggest the very principle of development should be refused.

Please reject this application

Thank you

The Barratt planning application Executive Summary opens with the statement below:



Westbury Road, Warminster
Barratt Bristol
Flood Risk Assessment & Drainage Strategy

Executive Summary

This site-specific FRA has been produced in accordance with the requirements of the NPPF, Planning Practice Guidance (PPG), and EA advice notes, and demonstrates that the proposed development will be safe from flood risk and that it will not increase flood risk elsewhere.

The site is located mostly within Flood Zone 1 with a low flood risk (less than 1:1,000 or 0.1% annual probability of flooding from rivers). The low parts of the site adjacent to the watercourse are Flood Zones 2 and 3 having a high risk of flooding. The proposed dwellings will only be in Flood Zone 1.

The proposed residential development is classified as 'More Vulnerable' and is in Flood Zone 1; the proposed residential development is suitable in this zone and the NPPF Sequential and Exception Tests are not required. Other less vulnerable uses will be in Flood Zones 2 and 3 in accordance with the NPPF/PPG compatibility.

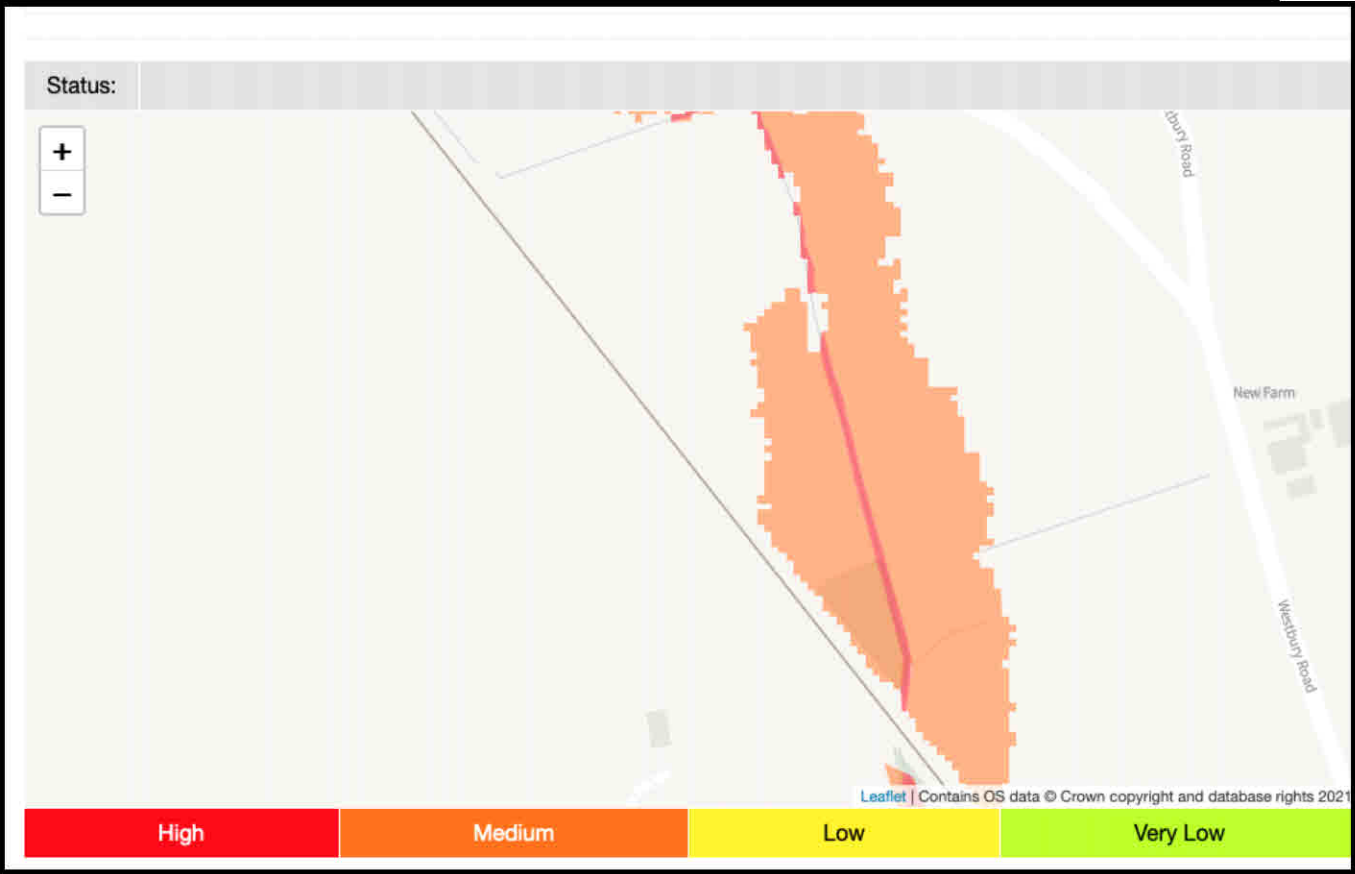
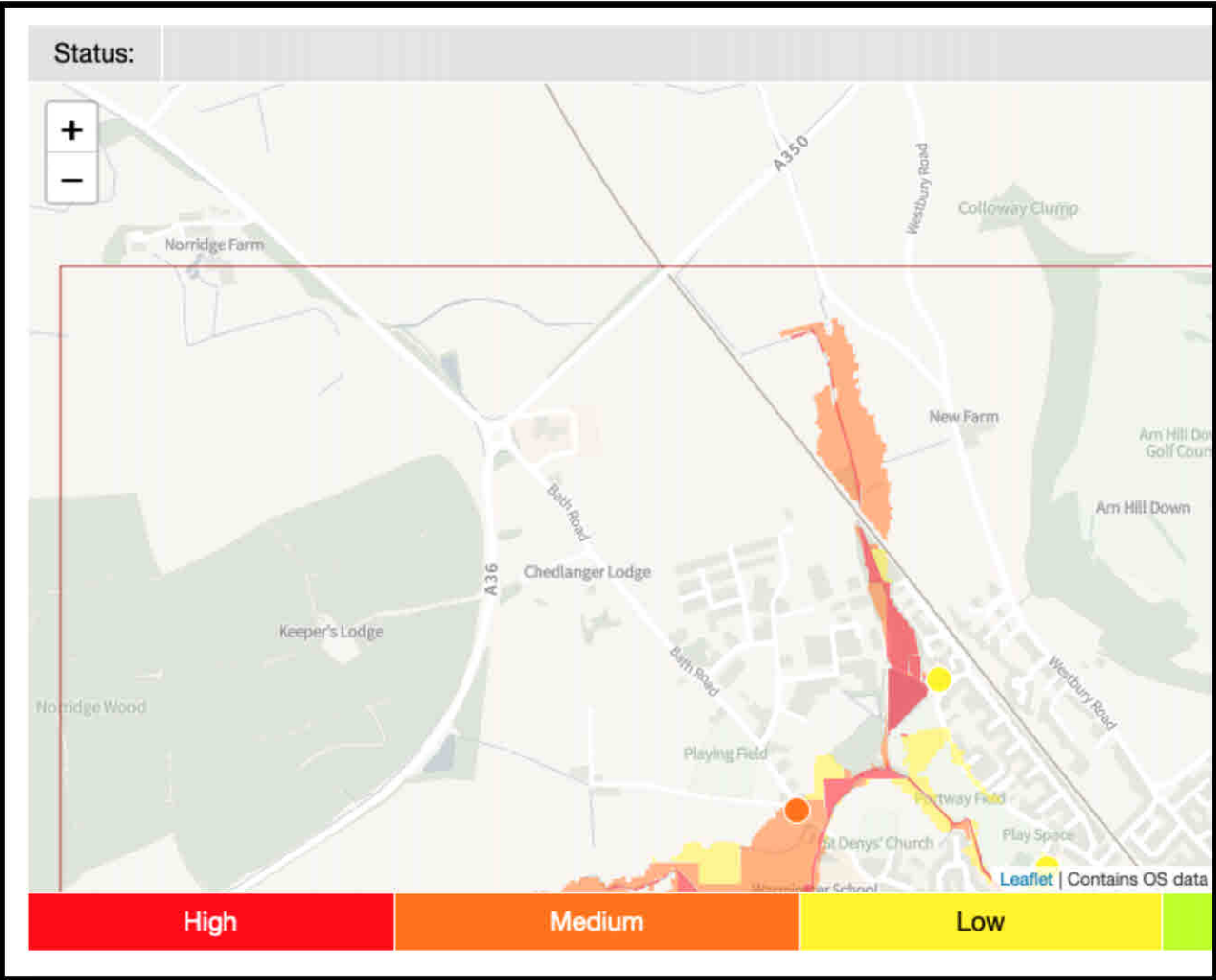
Maps from a number of sources all show that the proposed housing site for 205 new houses lies in a known area of flood risk. Sources for these maps are:

1. <https://www.getthedata.com/flood-map/warminster> Warminster Flood Map.
2. <https://riverlevels.uk/flood-warning-upper-wylfe-from-brixton-deverill-to-warminster#.YYEpWC-l3Fx> River Levels - Upper Wylfe from Brixton Deverill to Warminster, Flood Warning Area Details, Longbridge Deverills, Henfords Marsh, Boreham, Water Lane and Norton Bavant, Region: South West, Counties covered: Wiltshire, Watercourses covered: River Wylfe.
3. <https://check-long-term-flood-risk.service.gov.uk/map?easting=387146&northing=146072&map=SurfaceWater> Environment Agency, Learn More About this Area's Flood Risk.

Maps are shown on page 2, 3 and 4, all showing the same pattern of flood risk. The flood pattern agrees with the map provided within the Barratt flood risk assessment on page 7, yet Barratt rates the flood risk as low with a 0.1% risk, whereas the three source Maps show the level of risk to be 10 x higher than this, at 1% using the most optimistic outlook, or medium risk at the most pessimistic.

Flood Map 1 shows that the risk of flooding is categorised as Medium with a middle patch running down the middle described as High. The second map below this shows an expanded view of the same map illustrating the extent of flooding onto the proposed development site highlighting the medium and high risk areas.

Flood Map 1 - Warminster Flood Map

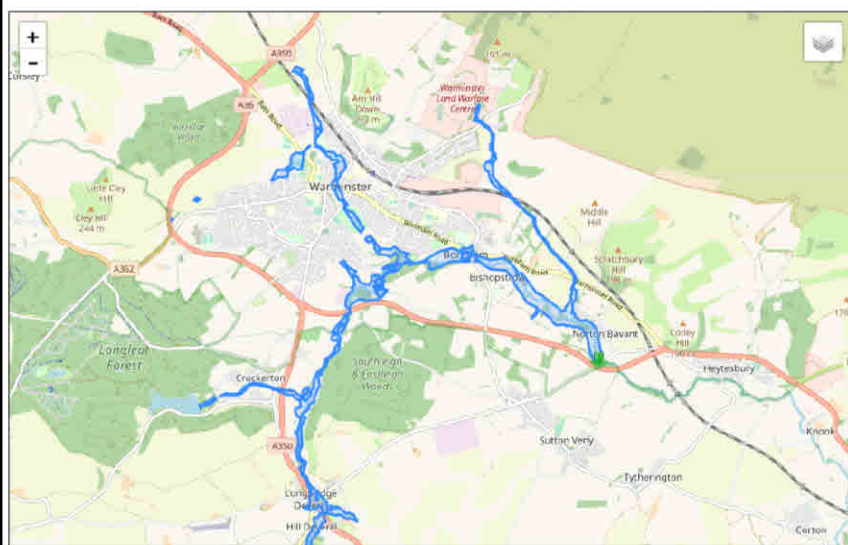


Flood Map 2 - River Levels, Flood Warnings, South West, upper Wylfe from Brixton Deverill to Warminster

Area covered by this alert location

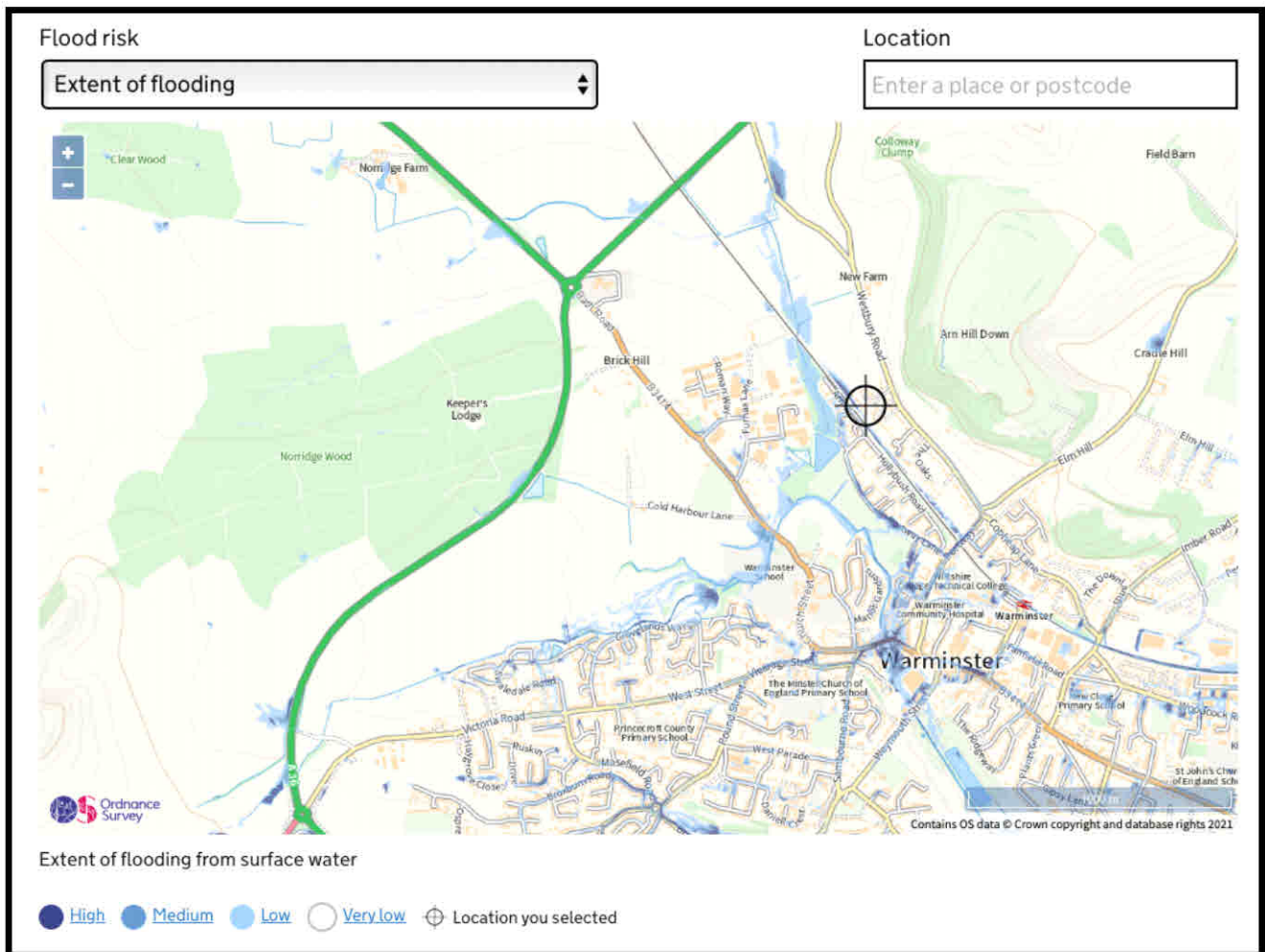
The area bounded in blue on the map shows the area covered by flood alerts and warnings for Upper Wylfe from Brixton Deverill to Warminster.

Icons on the map show nearby level monitoring stations. They are not necessarily related to this particular flood warning area.



Note: the area shown on the map is the area covered by flood alerts and warnings. It is not a live map of current flooding. The area covered broadly equates to the area where the risk of flooding in any year is greater than 1% (the "hundred year" flood risk).

The area covered broadly equates to the area where the risk of flooding in any year is **greater than** 1% (the "hundred year" flood risk). The statement is made clear by the caption below the lower map, exceeding by tenfold, Barratt's estimation of 0.1%.



Note that the Environment Agency describes the risk as low. They further define this term as: *Flood risk from surface water - **Low risk** - each year this area has a chance of flooding of between 0.1% and 1%. They state flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding.* The recent trend for wetter weather with unpredictable rain patterns makes this problem more, rather than less likely.

All three sources describe a risk of flooding significantly higher than the Barratt Executive Summary, which described the risk as *< 1 in 1,000 or 0.1% annual probability of flooding from rivers*, whereas the real risk from official sources is described as medium, *> 1% or between 0.1 - 1.0%*. Barratt's interpretation of the same source data as *very low* (page 38 1st para), can only be seen as incorrect and is unsupported by the data sources. The data indicates that the flooding risk is 10X greater at the most optimistic prediction or significantly higher at medium to high (Map 1 - Warminster Flood map).

The risk of flooding is not only from rivers, quoted as the sole source of flooding in the Barratt Executive summary, but also from surface water and ground water. These are quoted by the Environment Agency as:

Surface water - Very low risk. This information is suitable for identifying which parts of counties or towns are at risk, or have the most risk the approximate extent and depth of flooding. It is unlikely to be reliable for a local area and very unlikely to be reliable for identifying individual properties at risk.

Other flood risks - Groundwater - Flooding is possible in the local area when groundwater levels are high.



Groundwater - flooding is possible in the local area when groundwater levels are high. In areas with a high groundwater table, there is a risk of groundwater infiltration into sewers and drains. This can lead to sewer flooding.

From the location plan Barratt have offered on page 6, it can be seen that the proposed development site and the flood risk zones overlap.

Barratt mitigate the level of flooding by referring only to flooding from *Sea, rivers, surface waters and reservoirs* in their planning document whereas the risks from groundwater flooding is not mentioned within the Barratt flooding assessment.

The Appendix I, page 41 confidently asserts that Sewer flooding has never been recorded in the vicinity. It would be surprising if it had as the land remains green belt without development or sewers to flood from. This confident assertion should therefore be ignored.

On closer inspection of maps and data from the Environment Agency, the maps alongside show that a significant area covering the proposed development site is classified as medium risk (upper map).

The lower map shows more clearly the low risk areas as being extensive within the footprint of Barratt's proposed development (page 6).

Surface water, draining onto the land from rainfall falling onto the development, could only make this problem worse.

The high water table covering this area produces groundwater flooding every year, often extensive looking like a lake, and is noticed by local inhabitants from the vantage point of Arn Hill whilst walking their dogs. This would further contribute to the flooding risk and risk infiltration into sewers and drains.



Barratt's development site location plan



Existing elevations and gradients within plan

Barratt state, within the Executive Summary, that surface water from the proposed development will discharge into the watercourse running through the site.

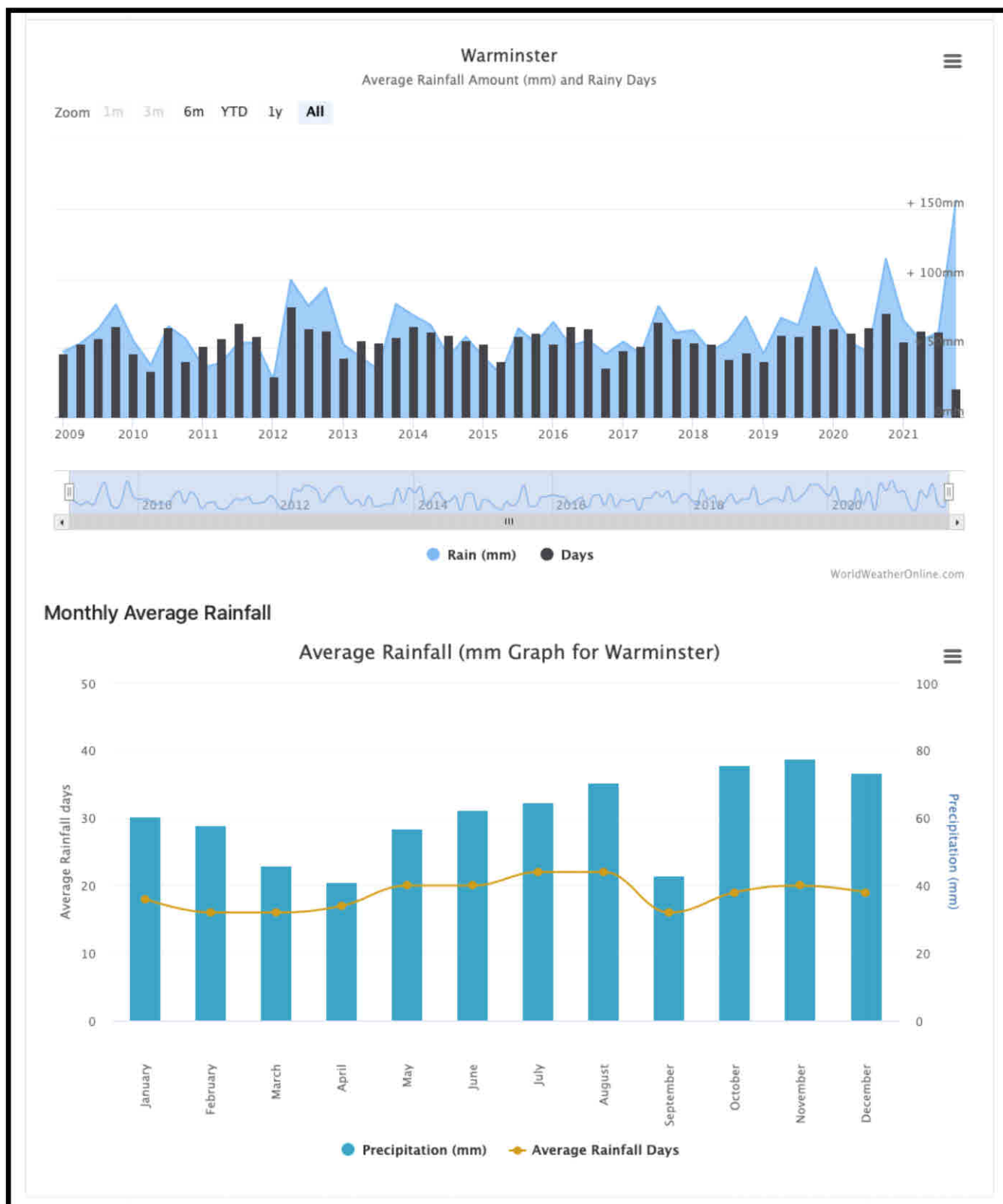
The site has a high water table with frequent groundwater flooding, visible after heavy rain, often taking many days to weeks to subside or be reabsorbed into the water saturated land. Surface water relies on rapid drainage into land which cannot occur if the land is saturated. Surface water would therefore exacerbate groundwater flooding.

Barratt organised a ground sample survey of the proposed development site on 8 March 2021. The results from this suggest that the ground was dry except for three samples at TP1, TP2 and TP18. Although this sounds encouraging, the survey was undertaken during a month of low rainfall. The weather on the previous 4 days had been relatively dry compared with the subsequent 4 days which were predominantly wet.



The graph on page 7 demonstrates the rainfall weather pattern for Warminster between 2009 to 2021. March, April and September are seen as having lower rainfall.

Samples taken on 8 March 2021 followed a period of mostly dry weather, whereas the weather changed on 9 March 2021 with four days of wet weather following the sampling (see pages 8 and 9). Had the sampling taken place during wet months, the picture would have been very different, with the likelihood of most samples showing the presence of water.

Warminster - Rainfall trends 2009 - 2021 - Source: <https://www.worldweatheronline.com/warminster-weather-averages/wiltshire/gb.aspx>



The charts below show the rainfall and temperature patterns on the four days preceding the sampling of soil, most of which were dry.

04.03.2021, THU			
Wind: 4-5 m/s, ☼ N,N-E, Pressure: 1029-1021 hPa, Humidity: 84-86%			
Overnight	+4°C		Mainly Cloudy
Morning	+5°C		Mainly Cloudy
Afternoon	+6°C		Mainly Cloudy
Evening	+5°C		Mainly Cloudy
05.03.2021, FRI			
Wind: 5-6 m/s, ☼ E,N-E, Pressure: 1037-1029 hPa, Humidity: 67-69%			
Overnight	0°C		Snow and Rain
Morning	+1°C		Snow and Rain
Afternoon	+5°C		Rain
Evening	+2°C		Occasional Showers
06.03.2021, SAT			
Wind: 3-4 m/s, ☼ E, Pressure: 1039-1031 hPa, Humidity: 63-65%			
Overnight	-2°C		Cloud
Morning	-1°C		Light Cloud
Afternoon	+6°C		Light Cloud
Evening	+2°C		Cloud
07.03.2021, SUN			
Wind: 2-3 m/s, ☼ N, Pressure: 1032-1024 hPa, Humidity: 64-66%			
Overnight	-2°C		Cloud
Morning	0°C		Light Cloud
Afternoon	+5°C		Light Cloud
Evening	+3°C		Cloud

The charts below show the rainfall and temperature patterns on the four days following sampling of soil, all of which were wet.

09.03.2021, TUE			
Wind: 4-5 m/s, ☼ W, Pressure: 1025-1017 hPa, Humidity: 68-70%			
Overnight	+1°C		Rain
Morning	+4°C		Mainly Cloudy
Afternoon	+9°C		Light Cloud
Evening	+4°C		Rain
10.03.2021, WEN			
Wind: 10-11 m/s, ☼ S,S-W, Pressure: 1012-1004 hPa, Humidity: 94-96%			
Overnight	+6°C		Occasional Showers
Morning	+9°C		Occasional Showers
Afternoon	+11°C		Occasional Showers
Evening	+11°C		Occasional Showers
11.03.2021, THU			
Wind: 11-12 m/s, ☼ W, Pressure: 1005-997 hPa, Humidity: 79-81%			
Overnight	+3°C		Occasional Showers
Morning	+5°C		Occasional Showers
Afternoon	+7°C		Occasional Showers
Evening	+6°C		Occasional Showers
12.03.2021, FRI			
Wind: 11-12 m/s, ☼ W, Pressure: 1009-1001 hPa, Humidity: 68-70%			
Overnight	+4°C		Occasional Showers
Morning	+5°C		Occasional Showers
Afternoon	+7°C		Rain
Evening	+5°C		Rain
13.03.2021, SAT			

Conclusions

- Barratt propose to build a development of 205 houses on land which they acknowledge as being at risk from flooding.
- Barratt have dramatically underestimated the risk of flooding. They state that the risk is 0.1%. Reputable sources including the Environment Agency show this risk to be significant at a risk of 1% at the most optimistic and medium to high risk otherwise.
- Barratt have only quoted a risk of flooding from Rivers, Sea and Reservoirs. They have not looked at groundwater flooding, which is the reason that the intended plot floods.
- Barratt have confidently asserted that there has never been a recorded case of sewage flooding within the area. The reason for this is that there have been no houses built upon this land for sewage flooding to occur.
- Sewage flooding is a real risk when there is significant surface water flooding during times of high groundwater saturation or groundwater flooding, which would be most likely to occur over winter months.
- Barratt undertook ground/soil sampling and found that most samples were dry excepting samples TP1, TP2 and TP 18, which were not. This sampling took place in one of the driest months of the year after a spell of relatively good weather. The results would have been less favourable had the sampling taken place during October, November or December, months of heavy rainfall.
- During months of heavy rainfall such as October, November and December, local residents have witnessed groundwater flooding on an annual basis that often takes up to a week to clear.
- Groundwater flooding of the site is a real, significant and frequent problem during winter months.
- For the above reasons, I would argue that the Barratt Proposed Development PL/ 2021/09013 is in breach of Wiltshire County Planning Regulations because they do not satisfy *Developer's guidance notes on Surface water soakaways* produced from surface rain falling onto the ground from the roofs of 205 dwellings as well as that falling onto the proposed road and pavement structure because:
 - Item **5. Areas at risk of groundwater flooding** which states - **There are instances where infiltration to ground is inappropriate and soakaways will not work. The groundwater level is a major factor in determining whether a soakaway is viable or not. A high groundwater table is an indication of limited infiltration potential.**
Groundwater levels also fluctuate with the seasons, therefore it is imperative to determine the maximum level taking into account seasonal variability. This can be done by monitoring on-site or consulting nearby historical borehole records (no such records exist for this proposed development site). This will ensure that the soakaway will perform as expected under a range of circumstances and when needed. The worst-case scenario is typically heavy rain falling onto saturated soil with the groundwater recharged. The soakaway should be designed to work even under these conditions.
- For the above reasons, I would argue that the Barratt Proposed Development PL/ 2021/09013 is in breach of **Department for Environment, Food and Rural Affairs, Sustainable Drainage Systems, Non-statutory technical standards for sustainable drainage systems, March 2015** which states:
 - Under **Volume Control - S6** Where it is not reasonably practicable to constrain the volume of runoff to any drain, sewer or surface water body in accordance with S4 or S5 above, the runoff volume must be discharged at a rate that does not adversely affect flood risk.

- Under **Flood risk within the development - S8** The drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur during a 1 in 100-year rainfall event in any part of: a building (including a basement); or in any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.
- Under **Flood risk within the development - S9** The design of the site must ensure that, so far as is reasonably practicable, flows resulting from rainfall in excess of a 1 in 100-year rainfall event are managed in exceedance routes that minimise the risks to people and property.
- For the above reasons, I would argue that the Barratt Proposed Development PL/2021/09013 is in breach of ***The National Planning Policy Framework (NPPF)*** published 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. This sets out the government's planning policies for England and how these are expected to be applied. The regulations, of which the most important are highlighted in red, state:
 - Under **Planning and Flood Risk:**
 - **160. Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as local flood authorities and internal drainage boards.**
 - **161. All plans should apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk**
 - **162. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.** The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.
 - **164. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:**
 - **(a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and**
 - **(b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.**
 - **165. Both elements of the exception test should be satisfied for development to be allocated or permitted.**

WTC – Planning Committee (Westbury Planning Application PL/2021/09013)

Chairman,

Thank you for the opportunity to speak. My name is Ian Tinsley. I have lived in Warminster for nearly thirty years and in my present home for twenty. I should declare that my current property backs onto the site of the proposed application. I believe you have had the opportunity to read a report I have made a contribution to but my main focus for objection is that this is bad for the whole of Warminster, not just those residents of Westbury Road.

I oppose this application on a wide range of planning points, including:

- This is an opportunistic development on behalf of the proposed developer.
- It fails to meet a local housing need.
- It is in excess of the housing numbers identified for the Warminster area.
- It represents a form of urban sprawl, completely out of keeping with the setting.
- Adds to the liability on already stretched services in Warminster.
- Is sited on a known flooding area.
- Adds to an already inadequate road/traffic problem in Warminster.

I shall concentrate on two others:

Firstly, the **Settlement Boundary**:

While no settlement boundary is sacrosanct, the edge of a town and an established boundary act as a useful division between the urban landscape and the rural setting.

With Warminster, the northern settlement boundary has been established for some 20 years and was reconfirmed in February 2020. The land to the north has been farmland for centuries and representative of the specific setting of Warminster as an attractive market town set into its rural setting, including the unique feature of Salisbury Plain.

Most planning authorities resist development outside the settlement boundary but could make exceptions such as:

- Buildings that promote the development and/or diversification of agricultural and other rural based businesses.
- The provision of facilities for outdoor sport, recreation, allotments, cemeteries and burial sites.
- Extensions or alterations to existing buildings.

Clearly this application meets none of those. Indeed, I suggest that, if it were approved, would then set an unwelcome precedent for the whole of the settlement boundary.

Secondly, **Biodiversity and the environmental impact**:

This application sits under the Arn Hill ridge and western rim of Salisbury Plain. As a resident for twenty years I can confirm that it is an area rich in biodiversity with

regular sightings of buzzards, deer, foxes, owls, badgers and numerous small mammals and birds and insect life.

The developer claims that this application will achieve " *a biodiversity net gain and important trees and hedgerows protected*". This claim is always made by developers and based on a government formula which gives a highly simplistic positive position based on preserving the current biodiversity unit score plus 10% either by enhancing the proposed site or by paying for improvements elsewhere.

This formula has attracted increasing criticism, including in *The Times* this year, since developers build on sites now (destroying habitats) with a promise that a compensatory biodiversity will be created over the next 30 years.

I invite you to apply your common sense to this case. Two hundred and five houses on these fields will destroy habitats and human activity will deter wild life. Roads, drive ways, pavements and foundations simply remove biodiversity. A few planted trees and garden space is no substitute and, in thirty years, the developer will not be around to account for this destruction.

Thank you.

WARMINSTER TOWN COUNCIL 22.11.21

Speech Notes

Key points:

- Barratt has been promoting site through CSR and believes this to be the right location for new housing at Warminster
- Site will pick up identified CSR need at Warminster and deliver much-needed affordable housing for local people
- Residents will be concerned about EA re-zoning of flood risk; development shown to avoid all but lowest risk area and will attenuate runoff
- Site offers on-site phosphate treatment to achieve neutrality – we believe it is the only site around Warminster capable of doing so
- Layout incorporates landscaping buffers, including to Upton Scudamore, and will achieve overall biodiversity net gain
- Applicant has engaged extensively in lead-up to the proposals, including webinar, press ad, etc. informing late changes to the proposals
- Supported by Network Rail and working on appropriate diverted PROW route that maintains quality and increases inclusivity
- While junctions spec'd to 50mph, supportive of speed reduction to 30mph or 40mph and S106 mechanism to provide funding for necessary TRO
- Scheme will also deliver footway/cycleway enhancements to Westbury Road, while protecting and enhancing flora on verge
- We are happy to answer questions

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Town Clerk
Warminster Town Council
Sambourne Rd
Warminster
Wiltshire
BA12 8LB

20 November 2021

Dear Sir

OBJECTION TO PLANNING APPLICATION PL/202/09013
BARRATT HOMES – WESTBURY ROAD, WARMINSTER

Introduction. Situated beneath the chalk downland, with its abundant flora and fauna, Warminster lies on the edge of the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB).¹ As you approach Warminster from the north, down Westbury Road, to the east is the western edge of Salisbury Plain and Arne Hill and to the west is open farm lands. The outskirt of Warminster along Westbury Road is populated with houses of a certain character, promoting the charm of the town.

The Barratt Homes (BH) application to build a 205 cramped housing estate on the western side of Warminster Road will spoil any welcoming effect to visit Warminster. It will be an eye sore built on arable land.

Aim. The aim of my letter is to object to the planning application PL/202/09013 on several fundamental grounds.

Objections

Objection 1 – Excess houses for Warminster?

The Warminster Plan, after its current new build programme, leaves it 60 houses short up to its 2036 new build programme. So why does the town require a further 145 houses, being built on arable farmland when there are several brown field sites in and around Warminster? The brown field sites should be developed as affordable houses for the young of Warminster, and not the Affordable Houses that BH (£255,000) is suggesting. Of course the brown field sites would not be economically attractive to BH, but would be to local builders.

¹ www.visitwiltshire.co.uk/towns-and-villages/warminster-p476483

Affordable houses, not government driven minus 20 percent of the cost Affordable Houses, is what Warminster requires for its young, not those purchasers from outside the area who can afford the BH houses (£318,000+). These purchasers on the whole will be working outside of Warminster and as far afield as Bristol, Southampton and London. Hardly an option that looks after those in Warminster who wish to own their own property.

Objection 2 – Flooding

The arable land that BH wants to build on is subject to annual flooding. The flooded fields become a flight path for ducks, migrating geese and swans. It is a sight to behold whether from the railway bridge or from Arne Hill looking down or from Upton Scudamore. With 205 houses, the road and path systems will only increase the flooding situation with rain run off. The planned sports field will either be under water or waterlogged. Where will this water run off go and who will maintain the run off site once BH leave? And what effect will it have on the various properties.

Notwithstanding that, the estate will take away a natural annual occurrence of migrating wildfowl which Warminster and Upton Scudamore residents have beheld for centuries.

Objection 3 – Infrastructure

The population of Warminster is over 24,926 dated 2018.² The Warminster Western Urban Extension, which incidentally fits in with the style of modern houses in that area, has been approved and will increase the population, traffic congestion and put a pressure on the overall infrastructure of Warminster. A housing estate of a further 205 houses equates to an extra 450+ people and 290+ cars will create a further strain on infrastructure. Warminster's infrastructure is currently very frail. Bullet point objections are:

- **GP Surgery.** The Avenue Surgery is the only surgery in Warminster. It has capacity problems right now.
- **Schools.** Warminster schools are at maximum capacity.
- **Sewage.** The sewage system is currently hardly able to cope.
- **Roads.** Warminster has a road network of 270 km. The percentage rate of collisions, injury and death within Warminster is greater than anywhere else in Wiltshire. The rate of killed or seriously injured casualties on roads in Warminster Community Area is 73 per 100,000 persons. This is higher than the rate for Wiltshire (46 per 100,000).³
- **Westbury Road.** The traffic is heavy and it will further increase the congestion. The BH cycle path along Westbury Road will cease at the end of the road, as the road infrastructure is incapable of supporting a cycle path any further. Warminster current casualty figures are hardly encouraging; they are the worst in Wiltshire and this increase of traffic will only exasperate the situation.
- **Parking.** The town does not have enough parking now.
- **Shops.** The high street and adjoining streets is a dearth of empty shops. Building more houses is not going to correct this malaise.
- **Employment.** What additional employment for the young will be created?
- **Community Infrastructure Levy (CIL).** 25 percent of the CIL will not cover any infrastructure improvement within Warminster. And it is interesting to note that Warminster is not on Wiltshire County Council 'strategic projects'.

² Wiltshire Council Community Area Joint Strategic Needs Assessment: Mid Year Population Estimates, Office for National Statistics, 2018

³ Wiltshire Council Community Area Joint Strategic Needs Assessment: Road accidents and safety statistics, Department for Transport, 2016-2018

- **Overall infrastructure.** Warminster is an old town, with a proud heritage going back to Saxon times, though obviously the buildings date from 1500/1600 onwards. The current road and building infrastructure does not in any way allow for modernisation of its infrastructure. The increase in cars would cause grid lock from Westbury Road to the Army camps and into the town centre.

Objection 4 – Environment

Wildlife Rich Areas. 26% of Warminster Community Area is classified as either a Site of Special Scientific Interest (SSI) or a County Wildlife Site (CWS). 3,251 individual species have so far been recorded in Warminster.⁴ As already stated, west of Westbury Road is a wildfowl flight path. Overhead can be seen on a daily basis circling buzzards and red kites. In addition deer graze on those fields. From Arne Hill these can be viewed by walkers, ramblers and 'birders' alike. I know as I walk up there daily.

Turning the grass verge along Warminster Road into a cycle path would destroy a fragile biodiversity that is inherent there. Along there can be found slow worms, lizards, Pyramidal orchids, Bee orchids and the exceptionally rare Large Scabious Mining bee. This bee is nationally rare and its only source of pollen is the Scabious flower found along Westbury Road.⁵

In addition, there are 20 types of butterflies, pheasant and flora. Plus the hedgerows are full of flora and fauna. The BH proposed site is adjacent to Salisbury Plain, nationally known as a Wildlife Rich Area. This wild life, flora and fauna, naturally migrates off the Plain and into the area west of Westbury Road

The projected BH site and cycle path is rich in wildlife, both flora and fauna. The site is not going to benefit the environment at all. In fact it will destroy an ecologically fragile and delicate ecosystem and area.

Conclusion.

I object to the BH proposed building of 205 houses off Westbury Road on the grounds of:

- Building excess houses to Warminster needs and requirements, whereas brown field sites would provide for Warminster building strategy.
- Flooding.
- An infrastructure that the town cannot support which will be further exasperated by 205 houses and all that brings.
 - GP Surgery
 - Schools
 - Sewage
 - Roads
 - Increase in car numbers
 - Parking
 - Shops
 - Employment
- Environmental and Ecological impact on an already fragile area which is wildlife rich.

⁴ Wiltshire Council Community Area Joint Strategic Needs Assessment: Natural England Open Data Geoportal, November 2019, Wiltshire and Swindon Biological Records Centre, April 2019

⁵ 'On the Verge' by Steve Smailes, Warminster Journal 5 November 2021.

I strongly believe the BH application, if agreed, will be detrimental for Warminster and Warminster area as a whole. The BH application should be refused

Yours sincerely

{Signed}

John SM Tulloch MBE