

Warminster Neighbourhood Plan 2

Housing Sites Allocations Topic Paper

January 2026

Introduction

This topic paper addresses the sites allocation process and its outcomes that was followed by the Warminster Neighbourhood Plan (WNP) Steering Group as part of the production of the second edition of the plan.

It summarises each stage and provides links/references to key associated evidence bases and documents. These should be referred to in conjunction with this paper.

This paper addresses procedures up to the publication of the Draft Regulation 14 WNP (second edition). It will be updated following the results and responses to that process.

Warminster Neighbourhood Plan Evidence Base

The topic paper refers to a range of documents and studies and Steering Group resolutions that have informed the sites allocation process and allocation material in the Neighbourhood Plan (NP). These are all itemised in the WNP Regulation 14 Evidence Base, and can be accessed via the following link:

<https://www.warminsterplan.com/evidence-base>

Housing Site Allocation Context

National Planning Policy Framework

Paragraph 74 of the National Planning Policy Framework (NPPF) states ‘Neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites....’.

NPPF (2024) Paragraph 14 states that where a local plan is considered ‘out of date’ and the NPPF Para 11 ‘tilted balance’ is applied, weakening Local Plan policies in decision making, ‘the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply: a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).

The Neighbourhood Plan Steering Group resolved to progress site allocations to meet NPPF criteria upon the Dec 2023 NPPF updates coming into force, extending the protective period to five years.

Wiltshire Local Plan

The WNPR is required to be informed by the emerging Local Plan Review. Wiltshire Council submitted the Wiltshire Local Plan1 to the Secretary of State for Housing Communities

and Local Government for independent examination on 28 November 2024. Policy 58 of the emerging Local Plan sets the neighbourhood designation requirement for Warminster at 90 dwellings. As such, alongside existing strategic housing allocations at the West Warminster Urban Extension, it is expected that a further 90 dwellings will be delivered through local site allocations over the period to 2038.

During the review process Wiltshire Council could not demonstrate it had maintained a sufficient supply of developable land across Wiltshire. Therefore Paragraph 11 of the NPPF was triggered, increasing pressure on Warminster from un-planned speculative development.

Local Housing Need

The Warminster Housing Needs Assessment (Dec 2022) identifies the specific housing needs of the community to inform the WNP approach to housing policy and allocations. It identifies that over the following 5 years, there is likely to be a minimum shortfall of 90 Affordable and specialist dwellings for Warminster. These are homes for people who's needs cannot be met through open market housing.

The average salary to afford to buy an entry level house in Warminster is estimated to be £48,000. This is higher than many working households, so Affordable Housing options are essential for the town's community.

Warminster Neighbourhood Plan Site Allocation Aims

By including housing allocation sites with capacity for at least 90 dwellings in the draft Neighbourhood Plan, the community can:

- **Influence Growth:** Help secure new homes in the most appropriate locations with the least environmental and community harm.
- **Secure Benefits:** Negotiate and secure **affordable housing, new green spaces, and vital infrastructure** improvements alongside the development.
- **Guide Design:** Retain greater influence over the design, layout, and overall look of new developments.
- **Plan-Led Growth:** Reduce the likelihood of unplanned, speculative development cropping up in other locations across the town.

Sites Allocation Process

The sites allocation process has followed a standard pathway as required by NDP Regulations and guidance.

1 Steering Group Decision to undertake a Sites Assessment and Allocation Process

The WNP Steering Group resolved to progress a sites allocation process at its meeting on 7th March 2024 following the publication of the December 2023 NPPF. This version of the NPPF extended the protection period for Neighbourhood Plans from two to five years after they are 'made,' provided the plan allocates sites to meet local housing requirements.

Making this decision to undertake a sites assessments process did not assume that sites will be allocated.

The process commenced after the updating of the objectives and majority of policies within the WNP review process. The assessment, selection and proposed allocation policies were therefore able to give weight to and be informed by these as well as policies within the current made WNP. This sequencing has provided an increased level of responsiveness to the process and draft allocations.

2 Call for Sites

Warminster Town Council undertook a local 'Call for Sites' between 20 May and 14 June 2024. It invited local people and land owners to put forward proposals for land and sites in Warminster that could be suitable for future development.

The process invited forms to be submitted that provided details of the sites to enable assessment.

These sites were added with sites already identified through the Wiltshire Local Plan Strategic Housing and Employment Land Availability Assessment (SHELAA) to form a pool of sites to be assessed which might be suitable for meeting the town's development needs in the future.

Fifteen sites were put forward for consideration in the Site Assessment process.

3 Technical Assessment

All sites were subject to an independent technical assessment of suitability, feasibility and availability. This was undertaken by consultant Land Use Consultants (LUC) which was appointed for Warminster Town Council by Locality, the Government's agent in administering technical and grant support for NP groups.

The final Warminster Sites Assessment Report was received by the Steering Group in January 2025. This work provides a high level, technical assessment of the sites put forward for consideration in this process. It does not determine which sites should be allocated and instead serves as technical evidence to inform the WNPR process.

- LUC undertook informal dialogue with site promoters to help ensure there were no factual errors in the report. Feedback from Wiltshire Council and the Steering Group have also informed the report.
- A set of criteria were developed and applied to each site to test and record the impacts of development of each site by LUC in the Sites Assessment Report. Overall scoring is given to each site against each criteria as a tool to portray sites and help inform decision making.

It assessed each site against a range of criteria and prided an assessment rating for each one:

- Red - significant detrimental impact likely e.g. directly affects Listed Building with no mitigation
- Pink - some detrimental impact likely
- Amber - possible detrimental impact, e.g. adjacent to Listed Building, or unlikely to contribute positively towards
- achieving NP objective
- Light Green - some positive impact likely or some positive contribution towards achieving NP objective
- Dark green - significant positive impact likely
- White - No Issue/Neutral impact

Seven sites were considered to either have a likely positive impact (site 4), or neutral impact if developed for residential use:

- Site 4: Land at Church Street
- Site 2: Bath Road
- Site 10: Land East of Damask Way
- Site 13: Land East of the Dene (Home Farm)
- Site 14: Yew Tree (Boreham Road)
- Site 15: Ashley Coombe

One site was considered to have a possible detrimental impact if taken forward at the scale the promoters are putting forward. If a smaller scale of development was considered then there was considered to have no issue / neutral impact.

- Site 8: Land West of Westbury Road (New Farm)

A link to the report and its assessment summary can be found on the Neighbourhood Plan website evidence page.

4 Steering Group Sites Workshop 13th January 2025

Seven members of the Steering Group, plus the Town Clerk, Project administrator and two Neighbourhood Plan Consultants (Place Studio) came together to consider the Site Assessment Outputs and continue the process of evaluating the sites which best meet the vision and objectives of the WNP. Aims of the workshop were to:

1. Soundly identify potentially suitable site allocation options towards meeting the identified Warminster Neighbourhood Plan (WNP) housing requirement and local housing needs, to be taken forward for consideration through community engagement.
2. To establish potential criteria to minimise potential harmful impacts of development and optimise delivery of WNP objectives on sites identified as options.
3. Identify and provide robust reasons why sites are not considered suitable to be taken forward as options for allocation.

Workshop Outcome

It was agreed the following sites should be taken forward as options for community consideration:

- Sites 13 Land East of the Dene (est' capacity 135 dwellings),
- Site 14 The Yew Tree (capacity 2 dwellings)
- Site 15 Ashley Coombe (capacity 79 dwellings)

A decision was outstanding on Site 4 Land at Church Lane and deferred to a later meeting (see below).

The three sites have a combined capacity of c214 dwellings. This is sufficient to both meet the Local Plan Housing requirement and potentially support the allocation of land to address the estimated shortfall in Affordable Housing need of 90 dwellings.

It was also agreed that information on all sites would be shared for informal (pre-Regulation 14) community consultation and feedback.

Due to the length of the workshop, a follow-up session on the 20th January resolved that site 4, Land at Church Road (capacity c60 dwellings) should not be taken forward to community engagement. Whilst site 4 was rated as potentially the most suitable in the LUC technical report, the site was not considered to perform as well as others when considered against WNP objectives, in particular the emerging policy to designate the land as a local green space and local knowledge of flood risk.

Following the completion of the workshop, information was received by the Town Council that consent had been granted for the development of site 2 at Bath Road. This site will therefore not be progressed further as an allocation site, subject to confirmation with the owner.

A copy of the Steering Group Workshop Report can be accessed via the Evidence Base pages on the WNP webpages.

4 Strategic Environmental Assessment / Habitats Regulation Assessment (SEA/HRA)

To be 'made', a Neighbourhood Plan must meet certain Basic Conditions. These include that the making of the plan "does not breach, and is otherwise compatible with, EU obligations." One of these obligations relates to Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'.

This is often referred to as the strategic environmental assessment (SEA) Directive. The SEA Directive seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing plans and programmes. The SEA Directive is transposed into English law through the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 1 and it is these regulations that WNP will need to be compatible with. Sites allocation is one of the most environmentally impactful parts of any plan. This is exacerbated within Warminster due to its particular relationship with environmental sensitivities. The SEA Regulations require that WNP is subject to the SEA process.

Screening

The process begins with a screening to determine if the draft WNP is likely to have significant environmental effects, and hence whether SEA is required. Wiltshire Council, as the 'Responsible Authority'¹ under the SEA Regulations², is responsible for undertaking an SEA screening process which has been carried out in accordance with the requirements of European Directive 2001/42/EC³, often known as the Strategic Environmental Assessment (SEA) Directive, which has been transposed into English law by the SEA Regulations.

In its screening report dated August 2023, Wiltshire Council considered that the draft WNP is likely to have significant environmental effects and accordingly a Strategic Environmental Assessment is required.

It should be noted that this screening opinion was provided on the emerging plan policies before the Steering Group resolved to progress housing site allocations.

Strategic Environmental Assessment

Locality appointed Land Use Consultants (LUC) to undertake a full SEA of the draft WNP (second edition). At this point it did not include site allocations.

Following the decision of the Steering Group to add site allocations to the draft plan, LUC undertook a SEA review of all 15 promoted sites to provide an additional sites focused environmental assessment of alternatives. Together with the Sites Assessment Report of suitability the SEA report (January 2025) further informed Steering Group in shaping responsive sites allocation draft policies.

Following the decision to shortlist and allocate two sites within the draft WNP, LUC updated the first SEA report in order that it coordinated a comprehensive assessment of the WNP including sites. The updated draft report was received in November 2025 to be finalised for Reg 14 consultation.

All SEA related documentation including that relating to sites is available for reference in the document evidence base.

Addressing Habitats Regulations

An early draft of the Plan also underwent a Habitats Regulations Assessment (HRA) screening from Wiltshire Council. The Council's ecologist has confirmed that, having been screened under the Habitats Regulations, an appropriate assessment (AA) will be required and the WNP be subject to appropriate assessment due to the potential for recreational effects on the River Avon SAC.

This will be undertaken by Wiltshire Council as the competent authority at the formal stages of consultation - Regulation 14 and 16.

6 Informal Pre-Regulation 14 Engagements

Neighbourhood Planning Regulations require that the Qualifying Body (WTC) undertake Regulation 14 consultation. However, it is best practice to engage the community and stakeholders informally prior to this in building evidence and shaping policy.

Following the 'Call for Sites' consultation, The Steering Group has sought to optimise opportunities for local people and stakeholders to inform and comment on emerging sites related evidence and proposals through a programme of informal pre-regulation 14 engagements which have influenced the draft Regulation 14 Plan.

Informal Community Sites Allocation Consultation

Public consultation was held from 8th March to 6th April 2025 to gather feedback from the local community on the proposed shortlisted sites.

Throughout the consultation period, residents were encouraged to share their views through an online survey, with paper copies made available request. An information leaflet was also produced to provide background on the WNP and Site Allocation Process.

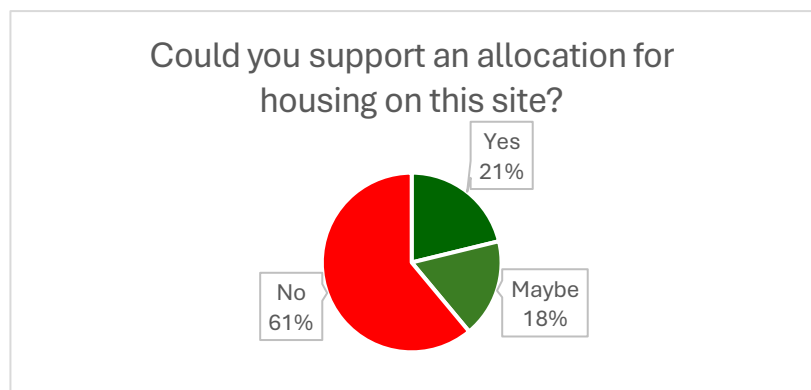
A public drop-in event took place at the Warminster Civic Centre on Saturday 8th March from 10am to 3pm. Information boards were displayed to provide background information on the Site Allocation process and Steering Group members were available to answer questions and engage with attendees. A total of 13 members of the public attended the event. Display board were at the Civic Centre for the entire 8th March to 6th April 2025 period.

Consultation sought community views on the potential allocation of the three shortlisted sites:

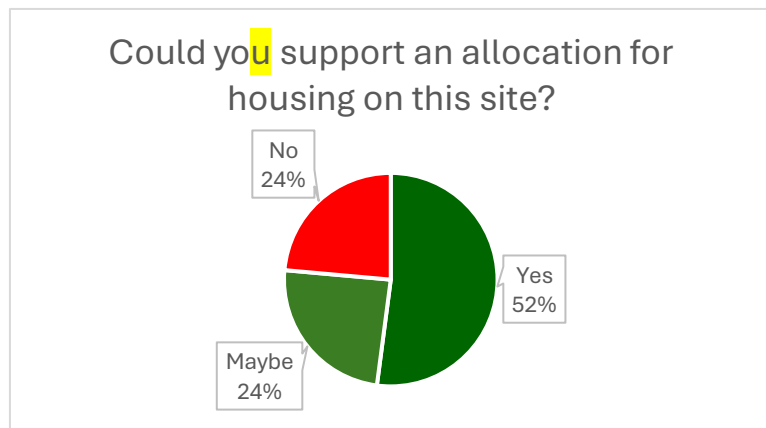
- Site 13: Land East of the Dene (Home Farm)
- Site 14: Yew Tree (Boreham Road)
- Site 15: Ashley Coombe

A total of 670 surveys were completed. People were asked 'Could you support an allocation for housing on this site?'. They were also asked to give reasons for their answer and 'What do you think should be taken into account when considering the potential allocation of this site?' Response summary:

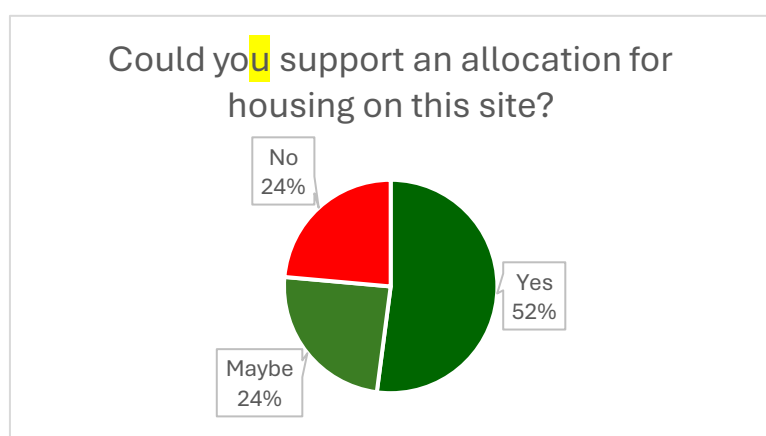
Site 13, Land East of the Dene (Home Farm)



Site 14, Yew Tree;



Site 15, Ashley Coombe;



Feedback from the surveys has been used to consider whether sites should be progressed to formal Reg 14 consultation and to identify issues that associated draft policies address.

The results have been summarised - see Appendix H of the WNP Consultation Statement.

7 Further Informal Site Promoter Engagement, 5 & 6 July 2025

Following the Site Allocation consultation, online meetings were arranged with the Steering Group and site promoters of shortlisted sites that had received significant public opposition. These meetings provided an opportunity for site representatives to present updates and answer any questions from the Steering Group.

Meetings were held on:

- 5th July 2025 with the planners and developers representing the Land East of the Dene site
- 6th July 2025 with the promoters of the Ashley Coombe site

These sessions helped the Steering Group gain further insight into each proposal and consider how public feedback might be addressed.

Withdrawal of Site 15, Ashley Coombe

At this point the promoter of Site 15, Ashley Coombe, withdrew the site and draft scheme that had been previously promoted, assessed and presented to the community for comments. The promoter tabled an alternative scheme for the location that occupied a different site area and produced a different number of dwellings. In addition, the revised proposed site extended further into a water treatment works buffer zone which is contrary to Wiltshire Council Core Strategy policy. As a result, Steering Group at its meeting on 24th July 2024 had to withdraw the initially promoted Ashley Coombe site from the shortlist. It resolved that it could not substitute the revised scheme because it was materially different and had not been assessed or consulted on.

8 Meeting with East Boreham Residents Action Group (EBRAG) 6 August 2025

A further extra-ordinary dedicated engagement meeting with residents living in close proximity to the Land East of the Dene site was held on 6 August 2025. This meeting aimed to provide an opportunity for residents to share additional feedback on the proposed allocation and raise further questions.

Following the meeting, residents were offered the opportunity to submit any further questions to the council. A copy of the resident engagement meeting notes, additional questions submitted by residents, response from Steering Group and information pack distributed to attendees can be reviewed in Appendix I of the Consultation Statement.

A summary of all consultations and relevant links to consultation material can be referenced in the Warminster Neighbourhood Plan Consultation Statement within the document Evidence Base

9 Steering Group Consideration of Draft Allocation Policies

At its meeting on 9th October 2025 Steering Group considered and resolved draft site allocation texts and agree on the inclusion of two sites (The Yew Tree and Land East of the Dene) within the Regulation 14 Draft of WNP (second edition).

Site allocation policies have regard to and seek to address the matters raised during the preceding sites assessment, consultation and selection process, addressing sustainable development criteria and locally specific matters. These are now within the published draft plan.

10 Regulation 14 Consultation

At its meeting on 11th December 2025 the Steering Group confirmed its resolution to;

- I Maintain Site Allocations as part of the WNP (second edition) draft framework.
- II Include Sites 13 and 14 as draft allocations within the Regulation 14 draft WNP.

Minutes of all Steering Group meetings can be referenced in the WNP review evidence base

Regulation 14 consultation is the first legally required formal public consultation on the whole draft updated Warminster Neighbourhood Plan. It must be undertaken for a minimum of six weeks. Regulation 14 consultation is undertaken by the Qualifying Body

(Warminster Town Council - WTC). WTC has resolved Reg 14 consultation will be undertaken from the end of January 2026 for a period of eight weeks.

All representations duly made will be recorded, reviewed and a response provided. The Steering Group and WTC will resolve any amendments to the draft plan in response to feedback, prior to submission of the draft plan to Wiltshire Council.

The site allocations are proposed as *draft* policies to enable local people across Warminster to consider the detail of the allocation within the wider context of the whole Neighbourhood Plan.

The objective of the consultation is to hear from as many people as possible on the whole plan and the proposed allocations, and on the strength of that response, the housing allocations will either be included in the next version of the Plan, or they will be removed.

A summary of all consultations and relevant links to consultation material can be referenced in the Warminster Neighbourhood Plan Consultation Statement which can also be accessed via the Evidence Base pages on the Neighbourhood Plan website evidence base webpages.