

Warminster Neighbourhood Plan

Steering Group Meeting Minutes Monday 15th September, 2pm Warminster Civic Centre

1. **Attendance:** Cllr. Phil Keeble (Chair), Harriet James, Len Turner, Cllr. Barrie Pirie, Cllr. Liz Lee, Cllr. Andrew Cooper (online), Tom Dommett and Clare Collier.

Apologies: Nick Earle, Sam Hill, Jon Ellis, Iain Perkins, and Peter Ruscoe.

2. **Approval of the minutes from the meeting held on 25th June and 24th July 2025**

The minutes of the meeting held on 25th June were approved, subject to the following amendment:

Harriet expressed disappointment with the response received from Sophie Davies regarding mitigation queries to be changed to Harriet expressed disappointment with the response received from Sophie Davies regarding sewage mitigation queries.

The minutes of the meeting held on 24th July were approved, subject to the following amendment:

The Steering Group no longer believe they have to allocate above 90 dwellings to provide extra affordable housing as more sites are coming forward change to The Steering Group no longer believe they have to allocate so many dwellings to provide extra affordable housing as more sites are coming forward.

3. **Response to Land East of the Dene residents' questions to be approved**

The Steering Group discussed the responses, drafted by Place Studio, to the queries and concerns submitted by residents following the Community Engagement Meeting held on 6th August 2025. After much consideration, members unanimously signed off the responses (question responses at the end of the meeting minutes). It was noted that the full notes from the Community Engagement Meeting, additional questions, responses and information pack will be included in the Consultation Statement.

Action: The Group requested a flow diagram to show the next stages of the NP process.

It was confirmed that if the Site Allocation is progressed to the Regulation 14 Consultation, LUC will need to finalise the Strategic Environment Assessment report (SEA). Statutory consultees (Wiltshire Council, Environment Agency, Historic England and Natural England) will be consulted on the SEA at the Plan's pre-submission Regulation 14 Consultation.

Members considered the Land East of the Dene proposal to be robust. Considering the current shortfall in Wiltshire's Land Supply, it was felt likely that the proposal would be supported by

Wiltshire Council Planning. The Group therefore thought that Site Allocation should remain in the draft plan, allowing the community the opportunity to comment during the Regulation 14 Consultation. A final decision on the way forward with Site Allocation will be made by the Steering Group at the scheduled meeting in October.

By including the Site Allocation within the Plan, a degree of influence will be retained over what can be incorporated into any development. It was discussed that specific restrictions should be included within the Plan to ensure control of the development.

4. Community projects to be signed off

The Group approved the proposed Community Project List subject to a few minor changes.

5. Any other business

- Wessex Water was contacted to obtain their view of the reviewed Ashley Coombe/Fanshaw Way site proposal. They confirmed that the reviewed proposal brings residential development closer to the water recycling centre and as such raises greater concern, principally the potential for future residents to suffer fly nuisance.
- The developers of the Land South of Wren Close had requested a meeting with the Steering Group to discuss their site proposal further. It felt that they should submit their comments at the Regulation 14 Consultation stage.
- The Group raised the point that it would be necessary to produce the Plan in accessible formats.

6. Date of next meeting

Thursday 9th October 2025, 6pm at the Civic Centre.

Agreed Responses to Issues Raised by Land East of the Dene Residents, EBRAG and Bishopstrow Hotel Representatives

Introduction

The following questions and answers have been collated from the questions asked by individuals at the Land East of the Dene Community Engagement meeting on 6th August 2025 and in subsequent emails. They address the issues raised by most feedback. To avoid repetition, they address topic areas but not every single question individually. They do not address opinions expressed by some attendees. These may still be addressed through further consultations where justifying evidence is presented. All questions and opinions are recorded and will be addressed through the coming stages of the WNP process and added to engagement feedback in the WNP consultation documents.

Steering Group Qualifications and Due Diligence

Several responses questioned the town planning qualifications within the WNP Steering Group and team. It was suggested that consultant advice was being accepted without proper assessment by a professionally qualified planner or that proper due diligence was being undertaken. As a result, the sites assessment process is unsound.

Answer:

The Neighbourhood Plan process is community led. Members of the Steering Group are volunteers representing the community of Warminster. Some are town councillors with significant hands-on

experience in addressing town planning issues. Throughout the WNP review process there has been an open opportunity for members of the community to join the WNP Steering Group.

The Town Council has appointed a chartered town planner with significant experience in supporting successfully made plans. The consultant represents Warminster Town Council and has no conflicts of interest. There is confidence in the advice on the consultants employed by the Town Council to work with the Steering Group.

The Sites Assessment process along with other evidence bases supporting the updated Plan have been produced by appropriately skilled and qualified professionals. All evidence is open to consultation and formal examination.

There is due diligence embedded within the Neighbourhood Plan making process. Neighbourhood Plan making is a formal and legal process. There are opportunities to provide formal representations by statutory bodies and other external checks, including an examination by an Inspector within the process. These points were articulated at the meeting and set out in Neighbourhood Plan making regulations. These are expanded upon in other questions and answers.

Lack of Transparency of Process

It was suggested that the engagement process lacked transparency and was potentially biased. Communication and engagement were woefully inadequate. Residents who may be impacted by development were not aware of engagements and should have been directly contacted. Assessment and shortlisting of Land East of the Dene was done with no community input and no regard was given to previous well-organised strong objections to previous development proposals.

Answer:

Whilst it is not accepted that the consultation process was woefully inadequate, it is acknowledged and unfortunate that some residents have stated they were not aware of the opportunities to engage in the process so far.

The Steering Group has undertaken the following informal stages of engagement:

- Press releases were distributed with coverage in local newspapers such as the Wiltshire Times.
- An advert was included in the new Warminster Journal.
- Social media coverage via the council Facebook Page – which was shared widely by others such as Spotted in Warminster and Heart of Warminster.
- Promotion via the Warminster Town Council and Warminster Neighbourhood Plan websites.
- Posters have been distributed.
- There was a board display in the Civic Centre promoting the consultation.
- Radio interviews have been held e.g. with Warminster Community Radio

Direct email has been sent to people who have signed up to receive Warminster Neighbourhood Plan updates. Residents are encouraged to register with the Neighbourhood Plan to directly receive future updates of WNP consultations at:

<https://www.warminsterplan.com/contact>

There are no specific guidelines for informal stages of engagement prior to the required regulatory consultation stages. However, a record of all steps undertaken is kept and will be included within a Consultation Statement. This must satisfy the Neighbourhood Plan Examiner that the Plan has been produced with proportionate and effective community and stakeholder engagement.

In relation to potential promoted sites, the Steering Group undertook what is called a Call for Sites where developers and landowners put forward 15 sites for consideration. This process was public.

Material relating to all 15 sites were subject to independent technical assessment using a nationally recognised methodology to assess their potential suitability, achievability and availability. The Steering Group carefully considered the assessment of all the sites, together with their potential to achieve local neighbourhood plan objectives and policies. Addressing both technical assessment and assessment against WNP objectives, it identified three that it felt had the greatest potential from the options available.

These sites and the assessment report on all 15 promoted sites were consulted on informally, giving people their first chance to say whether they agree or disagree with the sites assessment and view of the Steering Group or if they prefer any of the other sites put forward. A promotional campaign was undertaken over a six-week period with the aim of engaging the public with the site allocation process. Public consultation ran from 8th March and closed on 6th April 2025.

The Town Council is required to undertake a formal six-week period of pre-submission 'Regulation 14' consultation. This is scheduled for early 2026. The proposed approach to addressing local housing needs within WNP will be published for consultation as part of the 'pre-submission' (Reg 14) Neighbourhood Plan. All members of our community, landowners promoting sites and statutory bodies such as Wiltshire Council, Historic England, Environment Agency and Natural England will have an opportunity to comment on the draft Plan during a six-week public consultation.

The Steering Group and Town Council has a duty to review and publish responses to all duly made representations in preparing a second 'submission' version of the Plan that will be subject to a further six-week (Reg 16) consultation, examination and referendum undertaken by Wiltshire Council.

Consultations will include open access to legally required supporting documents. These will include sites related evidence and a Consultation Statement. The examination will consider if engagement and consultation has been adequately undertaken within the Plan drafting process, if the WNP preparation and content has met legal requirements. Referendum within Warminster's community will be organised by Wiltshire Council. Only if it achieves a majority in favour can the updated WNP come into force.

The Town Council and Steering Group value feedback on the quality of its communications and engagement and will consider points raised.

Concerns were raised about the low public response rate to the survey and the democracy of the decision to shortlist the site. Only c4% of Warminster's adult population took part in WNP sites engagement and 61% of respondents did not support potential development of the site.

Answer:

Steering Group has made clear that the wider housing choice and Affordable Housing shortfall factors that were articulated by Cllr Keeble at the meeting and expressed in engagement feedback are also to be balanced with site specific issues raised. The consultation was initial to gauge feedback before deciding how to progress to the formal consultations (Regulation 14).

It is acknowledged that despite the efforts to engage local people in the opportunity to provide initial feedback on sites assessment set out above, the proportion of Warminster's community that responded was low. The following further formal stages of engagement on the emerging draft

updated Neighbourhood Plan provides an opportunity to obtain a greater level of feedback from across the community.

Need for Housing Allocations

There were questions about the number of houses required for Warminster, with residents questioning why the team had accepted a consultant's view that 300+ houses were needed to achieve 90 affordable homes.

Answer:

At the meeting Councillor Keeble set out the reasons why Warminster Town Council has resolved to explore the opportunity to allocate land for housing development within the updated Warminster Neighbourhood Plan. His introduction text has been supplied to residents.

Wiltshire Council has identified a 'requirement' of c90 dwellings to be planned for by the updated Warminster Neighbourhood Plan. This is in addition to existing commitments for the Western Urban Extension. This is not a figure identified by Warminster Town Council. The Local Plan is currently at examination. Its housing strategy will be considered by the examiners of that process.

It is not the case that the Steering Group has suggested 300+ homes. The Housing Needs Assessment report identified an unmet need for more affordable housing. The Steering Group is keen to explore how to optimise securing Affordable Housing to meet this local need. In the new Local Plan, Affordable Housing will be set at 40%, therefore 90 affordable homes delivered through developer contribution would require 225 houses to be built. The maximum number of dwellings put forward in the three shortlisted sites was 216. If proposed for allocation, the number of dwellings at Land East of the Dene would be restricted as part of the mitigation process in response to addressing constraints.

Flawed and Pre-ordained Site Assessment Process

Several questions focused on the technical aspects of the assessment and shortlisting planning process.

There was a failure to check facts and bias within the assessment process.

One of the main points was the Steering Group's decision not to reassess other sites on the original long list after a shortlisted site was removed.

Following the withdrawal of Land at Ashley Coombe the WNP sites assessment process now only has one shortlisted option. There is a consideration that the decision to allocate the site is already made. The selection process is a mockery. It should be reviewed or stopped.

Answer:

The Neighbourhood Plan Steering Group agreed to consider a site allocation as part of the review of the Neighbourhood Plan. Councillor Keeble's introduction text expands upon the reasons.

It is undertaking a process set out by national guidance. It has used a nationally recognised expert consultant (LUC) to undertake assessments. The consultant was selected for Warminster by the Government's neighbourhood planning agent 'Locality'. The assessment process has not been concluded as formal consultation will enable rigorous review of its outcomes by statutory bodies and further local input from residents. No decision has been made to propose allocation of the site.

Informal stages of engagement including that related to possible site allocation will be recorded and inform the first formal draft updated Neighbourhood Plan.

The Call for Sites undertaken by Warminster Town Council was open to all owners and all sites including 'brownfield' sites within the town. It obtained responses from owners of 15 sites. It can only consider sites voluntarily promoted and made available by owners. From the 15, three sites were shortlisted. However, information about all 15 were provided to the public.

No alternative preferred option site was put forward by responses to the recent engagement. Shortlisted sites may not progress to site allocation if the public does not support site allocation at the formal Regulation 14 consultation stage or the referendum. In addition, other material issues may arise during the remaining plan making process which may influence possible site allocation outcome.

The Steering Group has resolved to withdraw its shortlisting of land promoted at Ashley Coombe because the owner withdrew the scheme submitted for assessment. This is a sound decision as the previously promoted site and scheme is no longer available. This is a distinct issue and does not impact the consideration of Land East of the Dene on its own merits.

The formal consultation, examination and referendum process that will follow will resolve the outcome of the WNP review. The next Regulation 14 consultation process provides a further opportunity for local people and owners to promote alternative outcomes to draft WNP policies. The Steering Group will continue to have full regard to local input and duly made representations. The sites process is therefore ongoing and unresolved.

What Changed Circumstance Justify Shortlisting?

Residents pointed out that the site has a history of failed planning applications and was previously dismissed by a government inspector.

It was questioned whether there are changed circumstances since the 2019 rejection of the site at examination that justify its shortlisting through the WNP process.

Answer:

Planning legislation and the planning policy context has changed since 2019. The outline of the proposal put forward for the site has also changed. In previously excluding the site, the Inspector, Mr Lee commented that potentially a future proposal might be acceptable. But the reasons that found previous proposals unacceptable remain material today.

The Neighbourhood Plan process and its Call for Sites is a distinct new process that the owners of all sites are entitled to engage in without prejudice. However, previous planning history is a factor in assessment of sites. They are and will be primary considerations that will be addressed further through formal consultations with statutory bodies and examination potentially, should an allocation be proposed. Site allocations have the ability to include criteria to address and mitigate impacts through policy.

The engagement scheme was considered to indicate the intent of developer to expand development across the whole site utilising the proposed access road. Residents felt that the community would not be able to enforce mitigation measures and covenants, given past failures to enforce measure at other sites.

Answer:

Site allocations within a neighbourhood plan can only be proposed where the site has been made available for development by its owner and the owner supports the amount of development and site criteria proposed within an associated allocation policy.

Only a land use allocation can define a development amount, areas to be protected from development and additional measures to protect resident amenity, landscape, heritage and wildlife, amongst other criteria. This is the strongest possible method to proactively ensure that development is contained within defined locations and that land to be protected is not further developed.

Any site allocation policy will include necessary safeguards and mitigation requirements. These will be used to assess any following planning applications and apply conditions or legal requirements. These must be discharged or implemented to the satisfaction of the Local Planning Authority. By ensuring the agreements are tightly worded and timed, by having good relationship with the developers so agreements are delivered, by monitoring compliance and bringing pressure on enforcing bodies to see they are enforced. Any failure or breach of such conditions or legal agreements is an offence.

Even if a WNP site allocation could secure 5 years of protection against speculative development, what protection would be provided after that?

Answer:

If WNP allocates sufficient housing towards meeting its identified housing requirement (as set out by Wiltshire Council) it can qualify all of Warminster for NPPF Paragraph 14 protection from speculative development even when Wiltshire Council cannot demonstrate it has a supply of developable housing land allocated to meet Government requirements. Currently Wiltshire Council cannot demonstrate this. It may not in the coming years. Councillor Keeble's presentation explains the implications of this. After five years from potential making or adoption of WNP such protection will lapse. Warminster Town Council will therefore be able to consider a further update of the Plan.

Site-Specific Issues and Objections

Questions highlighted specific issues with the "Land East of the Dene/Home Farm" site.

Heritage

The impact on adjacent heritage assets and Bishopstrow Conservation Area were primary reasons that development of the site was considered unacceptable by the Planning Inspectorate in 2019. These factors remain unchanged. Other sites with fewer or no heritage constraints were not shortlisted. The impact on the open rural setting of the Grade II listed Bishopstrow House Hotel is unacceptable and will undermine its valuable contribution to the local economy.

Answer:

There are a number of factors in assessing sites set out in the associated report and Steering Group evidence. Heritage and setting factors have significant weight in this and will require proportionate consideration. Formal consultation (Regulation 14) will include obtaining responses from Historic England and Wiltshire Council that will influence the submission Plan.

It is accepted by the Steering Group that the concerns raised in relation to previous proposals remain of great weight. Further heritage impact assessment will be required to judge any proposal. This may conclude no development is appropriate or that limited development may be acceptable with mitigation. This process is ongoing through the WNP review. Formal consultation will secure

responses from statutory consultees including Wiltshire Council and Historic England which will inform the potential suitability of the site and extent of any potential allocation. If these and other reasonable concerns are not adequately addressed the site is unlikely to progress to allocation.

The assessment of heritage impact is not concluded. The Steering Group is required and committed to giving heritage issues significant weight in the ongoing process.

Environment

Questions were also raised about the potential harmful impact of development on biodiversity, bats and the International Dark Sky Area.

Answer:

These issues are usually addressed through criteria within any site allocation. These are linked to relevant policies within the Wiltshire and Warminster Plans. The Steering Group very strongly support protection of Warminster's environment the International Dark Skies. It is highly likely that the draft WNP update will contain robust local policies to ensure their protection across the town. Independent Habitats Regulations Appraisal is part of the WNP review process. It will have regard to any amended policies and their potential impacts and mitigations on designated habitats. The HRA will be available for public examination at formal consultation stages.

The onus will be on the developer to ensure biodiversity net gain, protections in conformity with strategic and local policy are addressed through development proposals. To help ensure such policies are fully effective it is essential that Wiltshire Council can demonstrate it has an up to date Local Plan and sufficient housing supply or Warminster must qualify for NPPF paragraph 14 protection.

Wiltshire Council has much greater difficulty challenging developers or winning planning appeals where plan-led control has been lost. It was explained; this is something Warminster Town Council seeks to re-secure for the whole town through the Neighbourhood Plan sites allocation process.

Flood Risk

It is suggested that the sites assessment and shortlisting process has failed to address NPPF policy adequately in respect of assessment of flood risk from all sources. Proof of compliance with national planning policies, specifically for a Strategic Flood Risk Assessment (SFRA2) and documents proving the site passes the "sequential and exception tests" for flood risk were sought.

Answer:

Sites assessment evidence is and will continue to be published for consultation with statutory bodies including the Environment Agency and Wiltshire Council. This will ensure all necessary assessments have been undertaken robustly for the purposes of plan making.

It is believed that the sites assessment process has followed the correct process for plan making. However, all policy matters relating to flood risk and management of water will be addressed through consultation with statutory bodies in the coming formal Regulation 14 consultation. Any errors raised can be addressed prior to submission.

The site assessment states: The site is in Flood Zone 1. The site is generally not likely to be subject to surface water flooding. There is a small area of risk in the south west of the site, south of Grange Farm, however development is not proposed in this area. However, local knowledge of flooding

obtained through the recent community engagement is a valuable area of additional feedback that will be taken into account.

Any proposed site allocation in WNP requires the developer to undertake necessary flood risk assessment associated with a planning application.

The land is grade 3a agricultural land - not poor quality as stated.

Answer:

The site assessment states “The site comprises a mix of 'other' land and Grade 3a agricultural land. There would therefore be some loss of best and most versatile land.” This is weighed against other site factors in the overall assessment.

Highway Access Safety

Evidence of two road traffic incidents demonstrates that the proposed access onto Boreham Road is not safe. An access would also necessitate unacceptable demolition of the existing boundary wall which is a non-designated heritage asset.

Answer:

The site assessment considers the site to be relatively well located to make walking and cycling for shorter trips viable. Safe access to and from and around any site is an essential and primary requirement of any development scheme. Wiltshire Council Core Strategy and Local Plan contain policies to secure this. Failures to demonstrate highway safety are strong reasons for rejecting proposed development. Site assessment has not flagged the site as incapable of delivering safe access. However, the evidence of traffic incidents demonstrates an issue that needs to be considered and addressed through a transport assessment and scheme. This is normal criteria in any site allocation.

The need for removal of part of the historic wall along Boreham Road, which is a non-designated heritage asset, to obtain access is an issue that will both need to be weighed against the benefits of providing homes and be minimised.