

PL/2026/02443 - Land at White Street, West Lavington, Wiltshire, SN10 4HR

Formal Objection

I object to the proposed development of 47 dwellings off White Street. The proposal is contrary to **Wiltshire Core Strategy** and the made **West Lavington Neighbourhood Plan** and is inconsistent with the **National Planning Policy Framework (NPPF)**. The cumulative impacts on highway safety, local congestion, flood risk, residential amenity, biodiversity, agricultural land and village capacity are not capable of being adequately mitigated.

1. Principle of Development & Location

The Council's written pre-application response (ENQ/2025/00848) makes clear that the proposal was considered unacceptable in principle at that stage. Officers explicitly stated that the development lies outside the defined Limits of Development for West Lavington and therefore within open countryside, where residential development is strictly controlled and only permitted in exceptional circumstances. An open market-led proposal for up to 47 dwellings was found not to meet any of the exception criteria set out in paragraph 4.25 of the Wiltshire Core Strategy. This weighs significantly against the proposal and confirms that it conflicts with the adopted spatial strategy. (https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237)

The pre-application response repeatedly emphasises the importance of avoiding harsh or abrupt urban edges, minimising suburban design influences, and ensuring a soft and verdant transition to the countryside. Officers advised that only a well-designed, low-density and landscape-led scheme could potentially reflect the character of this location. A 47-dwelling estate significantly exceeds what could reasonably be described as low-density within this sensitive rural edge context and therefore conflicts with this advice.

The Council's landscape advice also confirms that the site may qualify as a 'valued landscape' in NPPF terms due to its contribution to local character, community value, important views, and the setting of the Conservation Area. Even if this threshold were debated, the inherent beauty of the countryside and the contribution of the site to the village's rural setting attracts strong policy protection.

2. Highways Safety

The proposed access strategy is unacceptable. White Street is a narrow rural lane and the junction with the A360 has known visibility constraints. The West Lavington Neighbourhood Plan site-selection evidence specifically identified that this site (Site 3, "Behind High Street/Orchard

Place/White Street”), had “limited visibility” at the junction and that White Street was a “narrow lane” which may be inadequate to support new dwellings. It also recorded that “any substantial increase in development” would require the junction issue to be solved before development could proceed. ([https://www.westlavington.org.uk/documents/documents-2018/np-2018/West Lavington NDP Housing Site Selection Methodology.pdf](https://www.westlavington.org.uk/documents/documents-2018/np-2018/West%20Lavington%20NDP%20Housing%20Site%20Selection%20Methodology.pdf))

The NPPF requires development impacts on highway safety and congestion to be capable of being mitigated to an acceptable degree, and states that development may be refused where there would be an unacceptable highway-safety impact or severe residual cumulative impacts on the road network.

(https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

Wiltshire Core Strategy Core Policies 60 and 61 require new development to reduce the need to travel by private car, support safe and efficient movement, and demonstrate through transport assessment that all transport users have been properly considered.

(https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237)

A 47-dwelling estate would materially intensify use of a constrained lane and junction already identified by the Neighbourhood Plan evidence as problematic. The application should therefore be refused unless and until the applicant demonstrates, with robust junction modelling, visibility surveys, swept-path analysis and cumulative traffic assessment, that safe access can be achieved without harming the rural character of White Street or displacing risk elsewhere – both of which are at risk as vehicles are encouraged to use Rickbarton, All Saints Road and Church Street to overcome visibility issues.

White Street, All Saints Road, Church Lane and Rickbarton are single-vehicle-width lanes with no meaningful public passing places. Reliance on private driveways as informal passing bays is not a planning solution. It creates conflict between residents, pedestrians, cyclists, horse riders, delivery vehicles, emergency vehicles, refuse vehicles and construction traffic.

The NPPF requires applications to create places that are safe, secure and attractive and to prioritise pedestrian and cycle movements. This proposal would do the opposite by adding daily vehicle movements to a network of lanes that cannot accommodate two-way traffic safely or efficiently.

(https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

The resulting congestion would not be an abstract inconvenience. It would affect highway safety, emergency access, pedestrian safety, residential amenity and the functioning of the village. This is inconsistent with Wiltshire Core Strategy Core Policy 61 on transport and new development, and with Core Policy 57, which requires high-quality design and place-shaping that responds positively to local context and protects the amenity of existing residents.

(https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237)

Wiltshire Council's Highways pre-application advice expressly warned that any significant increase in traffic movements at the White Street / Church Street / A360 junction may be considered unacceptable and could form a reason for refusal. This concern arises from restricted visibility and the constrained geometry of the junction. This aligns precisely with the Neighbourhood Plan site assessment and reinforces the conclusion that the access arrangements represent a fundamental constraint rather than a matter of detailed mitigation.

The officer advice further demonstrates that the acceptability of the proposal is contingent on extensive third-party highway works, monitoring, surfacing, path widening, travel planning and behavioural interventions. Reliance on such a scale of mitigation is indicative of a site that is not inherently suitable for development of this scale and nature.

3. Highways Related Issues

The proposal is likely to generate rat-running through All Saints Road, Church Lane and Rickbarton as drivers seek alternatives to White Street and the A360 junction. These lanes are not designed to function as distributor roads. They are narrow residential lanes with poor visibility, limited pedestrian refuge, constrained junctions and no safe passing infrastructure.

This raises a cumulative highway issue. The NPPF requires the decision-maker to consider cumulative impacts on the road network, not merely the technical capacity of the immediate site access. A transport assessment that focuses only on peak-hour trip rates at the site access would fail to assess the real-world operation of the local network and therefore is not supported by the NPPF.

(https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

The application should be refused unless the applicant can demonstrate, through a full area-wide transport assessment, that the development would not cause unsafe or severe cumulative impacts on White Street, All Saints Road, Church Lane, Rickbarton and their junctions with the A360. Anecdotal evidence from occasions when the A360 has been closed to traffic shows the real-world impact this development would have on Rickbarton in particular. Cars meeting each other halfway with one needing to either reverse back onto a busy A-road or the other reversing 200m up a steep hill were a common occurrence, as was damage to banking and driveways.

4. Flooding and Surface-Water Drainage

The proposal is unacceptable in flood-risk terms. Existing local evidence shows repeated flooding at the A360 bend opposite Duck Street and at Duck Street, where water is forced up through drains and floods roads and properties. This is not a remote or theoretical "1 in 100

year” concern. Local residents report repeated flooding in each of the last three years and on many previous occasions with properties damaged.

The NPPF is clear that inappropriate development in areas at risk of flooding should be avoided, that development must be safe for its lifetime without increasing flood risk elsewhere, and that planning authorities must consider all sources of flood risk, including surface water and climate change. It also requires planning authorities to ensure that flood risk is not increased elsewhere which would be the case even if the water was held onsite and attenuated before releasing it into the network.

(https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

The current field allows rainfall to permeate naturally. Replacing it with roads, roofs, driveways and compacted gardens will inevitably alter the hydrology. Attenuation may slow discharge, but it does not remove the additional burden on a drainage network that local evidence shows is already overwhelmed. The relevant test is not whether the applicant can calculate a theoretical discharge rate on paper; it is whether the development will avoid increasing flood risk elsewhere in the real drainage catchment. On the evidence of repeated flooding downstream, that test is not met.

The West Lavington site-selection evidence also recorded public concern about surface-water flooding “particularly in view of the previous problems in this part of the village”.

([https://www.westlavington.org.uk/documents/documents-2018/np-2018/West Lavington NDP Housing Site Selection Methodology.pdf](https://www.westlavington.org.uk/documents/documents-2018/np-2018/West_Lavington_NDP_Housing_Site_Selection_Methodology.pdf))

Permission should be refused unless the Lead Local Flood Authority is satisfied, using up-to-date local flood-history evidence and climate-change allowances, that the proposal would not worsen flooding at the A360, Duck Street or surrounding properties. Planning officers should also seek recent flooding evidence from the parish council showing real-world impact of hydrology issues surrounding the site and not simply rely on hypothetical modelling.

5. Density, Overlooking and Loss of Privacy

The proposed two-storey dwellings behind High Street and Orchard Place would result in unacceptable overlooking and loss of privacy, particularly for Orchard Place, which is a cul-de-sac of bungalows. The change in scale and relationship would be harmful to existing residential amenity.

The NPPF requires planning decisions to create high-quality, beautiful and sustainable places and to secure a high standard of amenity for existing and future users. Wiltshire Core Strategy Core Policy 57 similarly seeks high-quality design and place-shaping, including protection of residential amenity and positive response to the existing townscape, landscape and local

character. (https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237)

The Neighbourhood Plan evidence already identified overlooking concerns from nearby residents in respect of this site. (<https://www.westlavington.org.uk/documents/documents-2018/np-2018/West Lavington NDP Housing Site Selection Methodology.pdf>)

The proposal would introduce an estate-scale development into a sensitive location where the relationship with existing bungalows, rear gardens and open countryside has not been shown to be acceptable.

6. Neighbourhood Plan Conflict

The applicant's claim that the proposal accords with the Neighbourhood Plan is misleading. The site was considered in the Neighbourhood Plan evidence base but was not allocated. The site-selection document identified this site (Site 3) as "Behind High Street/Orchard Place/White Street" and expressly concluded that it was "Not recommended for allocation".

The reasons were directly relevant to this application: inadequate access, harm from widening White Street, limited visibility, harm to the Conservation Area setting, biodiversity value, and demonstrable harm outweighing benefits. The same evidence also recorded that Wiltshire Council officers had concerns about limited visibility at the A360 junction and the inadequacy of White Street to support a number of new dwellings.

(<https://www.westlavington.org.uk/documents/documents-2018/np-2018/West Lavington NDP Housing Site Selection Methodology.pdf>)

The NPPF presumption in favour of sustainable development supports proposals that accord with an up-to-date development plan; it does not support proposals that mischaracterise a rejected site as if it were an allocation.

(https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

The pre-application advice confirms that there are **no** policies within the made West Lavington Neighbourhood Plan that support development of this scale or in this location. This directly contradicts any assertion by the applicant that the proposal aligns with, or is supported by, the Neighbourhood Plan. The site's omission from allocation was a conscious and evidence-led decision, and that evidence remains a highly material consideration.

This proposal is contrary to the plan-led approach and should be refused.

7. Loss of Agricultural Land

The site is productive agricultural land. If it comprises best and most versatile agricultural land, namely Grade 2, the NPPF requires decision-makers to recognise its economic and other benefits. The NPPF also states that where significant development of agricultural land is necessary, poorer-quality land should be preferred to higher-quality land. In this case, given recent development in West Lavington, this development cannot be deemed necessary. (https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

The pre-application response confirms that the site comprises Grade 2 agricultural land, which constitutes Best and Most Versatile land. National policy requires substantial weight to be given to the protection of such land, particularly where the development is not necessary and where alternative locations exist. In the absence of exceptional justification, the permanent loss of high-quality agricultural land weighs against the proposal.

8. Biodiversity Loss

The site has local biodiversity value. The Neighbourhood Plan site-selection evidence described the field as “undisturbed” and “harbouring a variety of biodiversity value”. Local residents also report bats, reptiles and other wildlife using the site. ([https://www.westlavington.org.uk/documents/documents-2018/np-2018/West Lavington NDP Housing Site Selection Methodology.pdf](https://www.westlavington.org.uk/documents/documents-2018/np-2018/West_Lavington_NDP_Housing_Site_Selection_Methodology.pdf))

The NPPF requires planning decisions to minimise impacts on biodiversity, provide net gains, protect ecological networks and support priority or threatened species such as bats and hedgehogs. It further states that if significant harm to biodiversity cannot be avoided, mitigated or compensated, planning permission should be refused. (https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

Wiltshire Core Strategy Core Policy 50 requires development proposals to demonstrate how features of nature-conservation value will be protected, retained, buffered and managed, and how unavoidable impacts will be mitigated and compensated. Residents are not satisfied that the development has undertaken this work. (https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237)

The reported cutting back of the field shortly before surveys, and alleged disturbance or movement of reptile mats, casts doubt on whether the ecological baseline is reliable. Planning officers should require independent ecological review and, if necessary, repeat surveys at the correct time of year and under appropriate site conditions. A biodiversity net gain calculation based on a degraded or artificially suppressed baseline should be given little weight.

9. Overdevelopment

West Lavington has already absorbed substantial recent growth, including developments of 50 homes and 19 homes elsewhere in the village. A further 47 dwellings would mean over 100 new homes in a very short period, imposing cumulative pressure on roads, drainage, local services, landscape character and community infrastructure.

The NPPF requires sustainable development to align growth and infrastructure, reflect local circumstances, and take account of the character, needs and opportunities of each area.

(https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

Wiltshire Core Strategy Core Policy 3 concerns infrastructure requirements, and Core Policy 48 supports rural life by improving access to services and infrastructure rather than overwhelming rural communities. (https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237)

The issue is not opposition to housing in principle. It is that this particular site was assessed through the Neighbourhood Plan process and rejected for sound planning reasons. Those reasons remain valid: poor access, flood risk, harm to character, residential amenity concerns and ecological value. The cumulative burden of yet another large development on a small rural community weighs strongly against permission.

10. Conclusion

For the reasons above, the application conflicts with the **NPPF, Wiltshire Core Strategy Core Policies 3, 50, 57, 60, 61, 67 and 68**, and the made **West Lavington Neighbourhood Plan** evidence base. The proposal would cause unacceptable harm through highway danger, congestion, rat-running, increased flood risk, loss of amenity, loss of agricultural land, biodiversity harm and overdevelopment.

Taken cumulatively, the pre-application advice reinforces and corroborates the objections set out above. The Council's own officers identified fundamental conflicts with the settlement strategy, open countryside protection, highways safety, landscape character, conservation area setting, agricultural land protection and design expectations. These are not minor or technical shortcomings; they go to the heart of whether the proposal represents sustainable development. It is clear that the harms arising from this proposal significantly and demonstrably outweigh its benefits, even having regard to the current housing land supply position.

Planning permission should be refused.