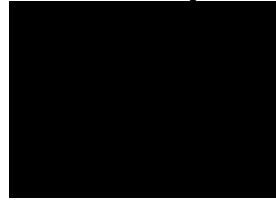


Mr Kevin Dyer



Dear Wiltshire Development Management,

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

I strongly object to the proposed development of 47 dwellings off White Street and agree closely with the objections raised by Counsellor D Muns, Ms G Ackerman and others who have responded to the consultation. Although as a resident of 1a White Street since February 2005 I have a clear interest in any development that potentially affects my property, I have been regularly involved in local community developments and activities throughout my time in the village, including site assessments for housing development. The site lies in open countryside outside the village's defined Limits of Development and consequently permission should be granted only in exceptional circumstances, the criteria for which have not been met in the Developer's proposal.

The cumulative potential impacts on highway safety, local congestion, flood risk, residential amenity, biodiversity, heritage character, agricultural land and village capacity are not capable of adequate mitigation. Just because construction might be feasible in technical and engineering terms does not militate for development at any cost to the community or environment. Moreover, large-scale urbanized development as proposed in the application in an area of few jobs and limited amenity or infrastructure will only exacerbate congestion on the already busy road network and seems in direct contradiction to sustainable development priorities, the NPPF, Wiltshire Core Strategy Policies and the made West Lavington Neighbourhood Plan, as articulated below.

Traffic flow onto White Street and the White Street / A360 junction

The proposed access strategy is unacceptable. White Street is a narrow rural lane and the junction with the A360 has obvious 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. Further, the access from the proposed estate into White Street does not adequately address the potential for conflict with other road users (including agricultural traffic) or the increase in road movements arising from deliveries, refuse and other services. The Developer is also assuming the land bordering White Street is in local authority ownership: I believe the proposed course of footpaths and access road would cross land that is in private ownership.

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. Wiltshire Core Strategy 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.

At the personal level, my property is directly aligned with and adjacent to this junction and I use it every day as either cyclist, motorcyclist or car driver. I categorically assert that, even given the Developer's engineering proposal to improve the sight lines, it is not safely feasible. I regularly cycle out of this junction and even with the closer proximity to the 'give way' line that a cyclist enjoys, the deceptive bend on the A360 hides from view vehicles approaching from the south and great care is required before joining the main highway. Drivers of cars and especially the many agricultural or goods vehicles that emerge from this junction must view the A360 from a more restricted position owing to the length of their vehicles – no amount of paring back the boundary verge will improve this sightline perspective without requisitioning significant land either from Wyneshore House or my own property at 1a White Street. The verges themselves are not regularly maintained by the Council (which cannot afford to do so on even a monthly basis in the growing seasons) and this would need to be an assured obligation prior to any potential engineering efforts to improve line of sight; I and my neighbours maintain the verges outside our hedges and plant them to encourage both the street scene and biodiversity. I understand that the pre-application advice the Developer received from Wiltshire Council's Highways adviser indicated that road safety mitigation measures of such a scale would be a pre-requisite to planning permission being granted and consequently seems indicative of a site unsuitable for development at the proposed scale. In the current economic climate, I do not believe such highways rectification, adjustment and continued maintenance is probable or even possible.

Furthermore, a 47-dwelling estate would materially intensify use of this constrained lane and junction already identified by the Neighbourhood Plan evidence as problematic. Existing residents (practically half the number of proposed new dwellings) already use the single-track roads of Rickbarton, All Saints' Road and Church Lane to emerge onto the A360 during times of congestion. For the relatively low number of vehicles currently involved this is acceptable. Potentially trebling the vehicle movements attempting to emerge onto the A360 at busy periods will produce unacceptable movements along these even narrower, highly unsuitable minor roads.

The Developer has intimated that the collision rate at this junction is insignificant. This relies on the fortunate fact that there have been recent no fatalities or serious injuries. However, I have personally witnessed multiple accidents at the junction which drivers have resolved between themselves over the last 21 years, and my late wife was involved in a collision requiring repairs to her vehicle and that of the other party. This is not a hazard-free junction by any stretch of the imagination: the risks of collision are real.

The Developer has also promoted the site based upon access to public transport: this is somewhat disingenuous. While the village is indeed served by bus routes,

these are of limited value to commuters and travellers as the services do not operate at times convenient to most modern working or social lifestyles, hence the over-reliance by the majority on private cars. Without improvements to the frequency and period of bus operation (which currently ceases too early each day in my view) any reliance on public transport is not a factor which should weigh strongly in favour of the application.

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 would be encouraged to use Rickbarton, All Saints Road and Church Lane to overcome visibility issues (and each of these other junctions also have restricted visibility issues).

Congestion on White Street, All Saints Road, Church Lane and Rickbarton

As highlighted above, White Street, All Saints Road, Church Lane and Rickbarton are single-vehicle-width lanes with no public passing places. Reliance on relatively inaccessible 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, agricultural and construction traffic. There are no footpaths beyond the White Street/A360 junction.

There is limited car parking anywhere in the village and in this part of West Lavington in particular. Care workers at Dauntsey House regularly park at the widest part of White Street (at the site of the proposed estate road access). The modest number of vehicles that can be accommodated here does not create congestion, but any new development would remove this amenity from local people, causing congestion issues around Duck Street or other local narrow lanes in order that these important local employees could park locally then walk to their place of work. No consultation, consideration or provision has been made for them by the Developer. The regular church worship services and major events such as weddings and funerals already create significant congestion on White Street, which is respectfully accepted by residents owing to its short-lived nature: this would be exacerbated by the proposed development as it would remove current parking capacity for such events, reducing local community amenity value.

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.

The resulting congestion would not be an abstract inconvenience. It would affect highway safety, emergency access, pedestrian safety, residential and employee amenity, agricultural operations 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.

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, no practical 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 vehicle trip rates at the site access would fail to assess the real-world operation of the local network by all users and therefore is not supported by the NPPF.

The application should be refused unless the applicant can demonstrate, through a full area-wide transport and pedestrian use 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. I have regularly witnessed first-hand many occasions when the A360 has been closed to traffic (particularly when temporarily blocked by long vehicles encountering each other at the narrow Church Street chicane – a daily occurrence) showing the real-world impact this development would have on Rickbarton in particular. Cars meeting each other halfway with one needing either to reverse back onto a busy A-road or the other reversing 200m up a steep hill have been a common occurrence, as has been damage to banking, driveways and vehicles attempting such manoeuvres. Indeed, in the last fortnight residents at the blind junction of Rickbarton and White Street have had their parked car damaged (wing mirror smashed off) by a driver attempting to circumvent a temporary blockage in the All Saints' Road/Church Street/Duck Street chicane. These issues exist already and would very likely be significantly worsened by the proposed development.

Flooding and surface-water drainage

The proposal is unacceptable in flood-risk terms. I alongside many village residents have personally witnessed repeated flooding at the A360 bend opposite Duck Street and at Duck Street, where water is forced up through drains to flood roads and properties. This has been an annual occurrence in practically every year I have lived here (often several times in a season), not a remote or theoretical “1 in 100 years” concern. Moreover, flooding in each of the last three years has become more extensive and on many previous occasions properties have been damaged. In addition, during periods of heavy rain onto waterlogged ground the footpath behind my house and No 1 White Street (WLAV10) regularly becomes a small stream flowing into White Street after heavy rainfall; conversion of pasture to impermeable surface will likely increase this occurrence.

As a further relevant example, several years ago I and other residents witnessed a heavy flow of water running down the A360 from the fields behind Dauntsey's School shortly after new sports pitches and car parks had been constructed. The school's installed flow-attenuation basin was unable to restrict the surface flow. The soil and topography there is near-identical to the proposed development site. Several properties in Sunnyside and Orchard place experienced running surface water through their gardens, and properties on the High Street opposite the Churchill Arms

were flooded. Dauntsey's School had to improve their flood mitigation measures – which has been successful to date – but the school had space and volume available at their site which enabled this to happen. This is a recent and perfect example of the increased flood risk associated with building over the subsoil slopes of Strawberry Hill (Greensand over Clay – the British Geological Survey indicates that drainage is slow: <https://webapps.bgs.ac.uk/Memoirs/docs/B06850.html>). The proposal to convert so much agricultural land to dense housing behind White Street and rely on existing drainage along the boundary of Wyneshore House will not be acceptable even if the flow is dammed back for attenuated release: even these ditches flood into White Street during periods of heavy autumn and winter rain (and contribute to the downstream flooding at the Duck Street bend on the A360).

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.

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 can and does already become 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”.

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.

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 Neighbourhood Plan evidence already identified overlooking concerns from nearby residents in respect of this site. 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.

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.

Conflict with the made West Lavington Neighbourhood Plan and Local Housing Needs

The Neighbourhood Plan addressed both local and broader anticipated housing needs from 2017-2026 and remains the current plan (an updated planning exercise is pending). Of note, the Developer has selectively based many of their assumptions and calculations using the 2021 census data, which was not available when the Neighbourhood Plan was created and agreed with Wiltshire Council. To date, the plan has been delivered against, indeed, it has been exceeded in terms of new dwellings. The existing plan required provision be made for the needs of young and growing families, and in so doing the Hedges House development removed a significant number of dwellings for the elderly. The Devizes Area population figures from the 2021 Census clearly indicate a local and wider area increase in the ageing population and the anticipated need is now for both younger families and the more elderly to have appropriate housing choices. The developer cannot claim alignment with the Neighbourhood Plan while also citing the 2021 population statistics. At the public meeting of the Parish Council on 7th May 2026 the Developer made clear that they 'do not build bungalows': evidently, they are not prepared to offer solutions that meet the housing needs of the local and broader area.

Consequently, the developer's claim that their proposal accords with the Neighbourhood Plan or area housing needs is misleading at best. The site was considered very carefully 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 traffic visibility, harm and intrusion into 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.

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. This proposal is contrary to the plan-led approach, is beyond the scale of the made Neighbourhood plan and proposes a dwelling density that would be harmful to the existing community and selectively considers Wiltshire's housing needs. Planning permission should therefore be refused.

Loss of agricultural land

The proposed development site has been confirmed as productive Grade 2 agricultural land. As such, 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 or meet the 'exceptional circumstances' criteria for the permanent change of land use.

During my time as a resident, the proposed site was regularly used as grazing land; there remains a demand locally for such land today. In my view the owners deliberately allowed the site to re-wild in order to make it seem derelict and unattractive for agricultural purposes. This understandably resulted in the site being used increasingly as a habitat for wildlife (see below regarding biodiversity loss). I have correspondence supporting my view from Mr John Huggett, who purported to represent the owners when approached to consider sale of the site for agricultural and community allotment purposes in February 2023. The owners' aim has always been to consider the maximum urban development potential of the land, to the detriment of any possible community or continued agricultural value.

Biodiversity loss and adequacy of ecological surveys

The site has local biodiversity value. The Neighbourhood Plan site-selection evidence described the field as "undisturbed" and "harbouring a variety of biodiversity value".

The Developer's own habitat and wildlife surveys demonstrate that the whole of the Strawberry Hill feature and surrounding fields support bats, reptiles, nesting birds and other wildlife using the site. I can personally attest that badgers, foxes, deer and rabbits, not to mention hedgehogs and mice, regularly roam through and inhabit the proposed development site since the removal of grazing sheep (and much wildlife was present when the sheep were also on the land).

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.

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: a few promised 'hedgehog runs' will play only lip service to biodiversity matters.

I witnessed with others the extensive cutting back and clearing of the field in question shortly before biodiversity surveys were undertaken. I also believe the reptile mats were disturbed. This pre-clearance and disturbance cast doubt on

whether the ecological baseline presented for planning consideration is reliable. While I encourage planning officers to require an independent ecological review and, if necessary, repeat surveys at the correct times of year and under appropriate site conditions, I doubt that the habitats will fully redevelop in the near term given the evident lengths to which the owners and their agents have gone physically to promote and prepare the site for housing development. The current biodiversity net gain calculation provided by the Developer based on a degraded or artificially suppressed baseline should be given very little weight.

The site currently acts as a soft buffer between the nearest existing dwellings and the conservation area. To build at such density on this site would eliminate the buffer zone and impact on the conservation area with resulting biodiversity loss owing to adjacent pressure on natural habitat. The extensive lighting needed for such a development would also have significant impact on nocturnal species – owls and bats in particular would be affected (and the local area supports many communities of these species; an abandoned owl fledgling was rescued just last week from Strawberry Hill, just 400m from the site).

Overdevelopment and cumulative pressure on the village

West Lavington is identified as a Large Village within the Wiltshire Core Strategy: only limited infill or small-scale development is accepted within Wiltshire's Core Policies. Since development of our Neighbourhood plan, West Lavington has already absorbed substantial recent growth, including developments of 8 houses on a former brown field site (Wheatsheaf Mews), 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. Wiltshire's policy framework does not support disproportionate development that materially alters village form or character. The density proposed is appropriate to a town, not a village setting. The site also lies outside the accepted village settlement boundary, does not represent an infill location and the proposal bears little relationship to the character of historic housing form that has evolved in the Lavingtons and Littleton Panell over time. In fact, the proposed development appears focussed solely on maximising the number of habitable units that can be placed on the site.

While population predictions and falling birth rate indicate the local primary school should be able to accommodate the increase in anticipated numbers, many local families continue to struggle to secure places for their children, resulting in increased car journeys to other schools in the area. We know the education assessment would require additional facilities and funding to accommodate increase at the local secondary school.

Foul drainage will also be a factor: I understand the Duck Street pumping station is not designed or built for larger scale sewage processing and is adjacent to the stream for surface water run-off in the local drainage basin. The Developer has asserted that a sewage access point has been identified by Wessex Water and that the suggested dwelling density modelling should be within the pumping station's existing capacity. At the public meeting on 7th May 2026 the Developer further suggested this was, in fact, a problem for Wessex Water to address once they had

connected new dwellings to the foul drain system. This is not an attractive statement and seems to shirk responsibility for sustainable development. Furthermore, the Developer has admitted that to access the existing sewage system they would need to dig through existing properties to reach the main sewer – owners of which have not been consulted. Without strong evidence being submitted to Wiltshire's planning officers that supports the sewage modelling, this application should be refused – not least for the potential risks and impact during construction but also once the site is commissioned.

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.

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. =

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 and infrastructure concerns and agricultural/ecological value. The cumulative burden of yet another large development on a small rural community weighs strongly against permission.

Conclusion

For the reasons above, the application conflicts with the **NPPF, Wiltshire Core Strategy Core Policies 1, 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, increased pressure on infrastructure, loss of agricultural land, biodiversity harm and overdevelopment.

I firmly believe that planning permission for this application should be **refused**.

Yours Sincerely,

Kevin Dyer