



Statement on behalf of Lavington School (03/04/19)

In support of

H1.4 East of Lavington School

Further to the inclusion of H1.4 within the Examination (to be discussed 16th April 2019) this statement has been submitted prior to the close of business on Thursday 11th April. Our position broadly is as follows:

- The Wiltshire Housing Site Allocations Plan (WHSAP) should be amended to include (again) H1.4 because it will deliver at least 15 houses before 2022;
- The emerging Market Lavington Neighbourhood Plan (MLNP) already supports this site (H1.4);
- The WHSAP Stage 4 Sustainability Assessment (Atkins) also supports the inclusion of this site in the WHSAP;
- Nevertheless, the WHSAP should not (belatedly) rely on the MLNP to deliver the site before 2026;
- The MLNP will hopefully progress, but it is a complex document;
- Generally, Neighbourhood Plans are prone to becoming snagged and delayed by unforeseen events and information. The MLNP may be 3 or 4 years away from completion – and could delay the delivery of at least 15 much needed houses;
- The reasons why H1.4 was removed, prior to the last Modification Stage, is not justified. It was also unexpected. The School objected at the Proposed Modification stage in November 2018. (See Appendix 1 for ease of reference).
- It is even clearer now (April 2019) that those responsible for the removal of H1.4 from the WHSAP (June -July 2018) promoted – unfairly in our opinion - a fear that too much land was being allocated for housing in the HMA. However, having attended the first day of the Examination (02/04/19) it is clear Wiltshire Council needs to re-instate this housing site – now – so that it will contribute to meeting the minimum housing requirements set out in the Core Strategy (CS).
- The removal of H1.4 from the WHSAP was not based on any clear environmental, social or economic justification in a Sustainability Appraisal, but a last-minute political intervention, without any substantive popular support.
- We are willing to enter into a Statement of Common Ground with Wiltshire Council (draft at Appendix 2).



- The school also wish it to be known that it has explored several different options regarding access to the site, taking advice from highways and traffic consultants.
- A number of solutions remain open, however the preferred option is that:
 - a. The main entrance to the school will be relocated, hence the current access to Lavington School will be an exclusive access to the H1.4 site.
And;
 - b. The new access to the school will need to be built on the southern perimeter of the school site using adopted highway and school land, and allow for a one way system for buses and cars to drop off and pick up children.
- The intention is this new access will benefit the school and village of Market Lavington in two principal ways:
 - a. To remove the significant Health and Safety concerns at present where school buses are forced to turn around in the main school yard where children all congregate before and after school.
 - b. To encourage all school traffic to approach from the West and hence reduce traffic congestion in Market Lavington at rush hour
- As all will be well aware of, national financial pressures on schools resources is significant, and the relocation of the school access is not feasible within the current school budget.
- Hence the developers of the H1.4 site will be funding the access relocation as part of any development plan.

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Benchmark Development Planning Ltd

Philip Salaman
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1

Appendix



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9th November 2018

Dear Sir or Madam

Please find attached our objection to the PC 3 and Annex A Table 4.1 Housing Land Supply, as part of Schedule of Proposed Changes to the draft WHSAP consultation. It has been prepared by Benchmark Planning, a development consultant contracted by the school.

We object to the removal of the SHLAA site ref 3443 : Land to the east of Lavington School as potential land for housing development.

Regards,

Philip Salaman

School Governor

Objection to PC 3 and Annex A Table 4.1 Housing Land Supply

Housing Allocation H1.4 East of Lavington School, Market Lavington					
PC48	Housing Allocation H1.4		To reflect the resolution of Wiltshire Council's Cabinet, all sites at Market Lavington are proposed to be deleted from the WHSAP. The reason	Delete section titled 'H1.4 East of Lavington School, Market Lavington'; delete site boundary map at Figure 5.4; delete paragraphs 5.36 to 5.37. Re-number subsequent paragraphs.	<ul style="list-style-type: none"> • TOP/04C: Topic Paper 4 – Developing Plan Proposals Addendum (July 2018); • CATP/06: Devizes Community Area Topic Paper (July 2018).
Proposed change ref number	Policy/Para reference	Key Issue/Rep numbers	Reason for Proposed Change	Proposed Change	Evidence Base for Proposed Change (Document Library reference)
			for this is that there is a comfortable five-year housing land supply position in the East HMA such that there is not a strategic imperative for sites to be allocated through the WHSAP at Market Lavington. Furthermore, significant progress has been made on the preparation of the Market Lavington Neighbourhood Plan, and given the strong five-year supply position in the East HMA, the Council can defer the consideration of potential housing allocations at Market Lavington to the emerging neighbourhood plan.		<ul style="list-style-type: none"> • DEM/03: Wiltshire Council Cabinet Resolution (3rd July 2018) available at https://cms.wiltshire.gov.uk/mqAi.aspx?ID=77768

(Source: Annex A EXAM.01 p18+19 – Sept 2018)

- The land to the east of Lavington School is identified in the emerging Neighbourhood Plan (Sept 2018) as follows:


SITE	Indicative No.'s	Policy Requirements
Site 5 - SHLAA 3443 Lavington School	15	is to be satisfactorily managed and now sustainable drainage can be provided without adverse impacts on or off site. 12. Highways report indicated that access complying with Regulations was possible but would need to be designed with care. The quantum was reduced on suggestion of Wiltshire Council to match the HSAP.



2. Consultants assessing emerging sites for housing at Market Lavington 2016 support this site coming forward for development, in the following terms:

Site 5 - Lavington School unused fields SHLAA ref 3443	
Site Area (ha)	0.92
Description	Unused school fields on the north west edge of the village.
Map	
Wiltshire Council SHLAA conclusions	Unknown
AECOM Conclusions and Recommendations	<p>The site has been brought forward as part of the SHLAA call for sites process and as such is available for development; it is in keeping with surrounding land uses with only minor constraints such as access improvements.</p> <p>AECOM capacity estimate of 20 dwellings</p>

Site Reference and Name

<i>Site Reference and Name</i>	
Site Reference	Site 5
Site Name	Lavington School unused fields
Map	
Photo	

Background Information

<i>Site location and use</i>	
Site location /address	Lavington School unused fields
Parish Name	Market Lavington
Site area (ha)	0.6
SHLAA site reference (if applicable)	3443

Context

Surrounding land uses				
<p>Is the site: Greenfield: Land (or a defined site) usually farmland, that has not previously been developed.</p> <p>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.</p>	Greenfield	Brownfield	Mixture	Unknown
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Existing/ previous use	Not in use			
<p>Site planning history Have there been any previous applications for development on this land? What was the outcome?</p>	No planning applications have been recorded at this site.			

Suitability

This section is to note any constraints to development, such as planning policy, environmental designations (national and local), access, proximity to amenities and services, infrastructure, heritage and impact on the surrounding area.

Suitability

Is the site within / adjacent to / outside the existing built up area?	The site is adjacent to the existing built up area.
How would development of this site relate to the surrounding uses?	The site would relate well to the surrounding uses. The Lavington secondary school is located immediately to the west of the site; there is an existing residential area to the south, and a wooded area (Canada Woods) to the north, which provides screening of the site.
How the site is currently accessed? Is it accessible from the highway network?	Access to the site is currently through the school grounds which would not be suitable if developed. There is potential for further access to be created via Park Road, however this requires further landscaping etc.

Environmental Considerations

What is the distance from the edge of the site to any of the following	Distance	Comments
Important green space?	<400m	Canada Woods is situated immediately adjacent to the sites north boundary. Additionally the Manor House Woods are

		located 330m west of the site. The Market Lavington Allotment Gardens are located 700m to the west.
Sites designated as being of national importance	>800m	The Salisbury Plain SSSI is located 1600m to the south east.
Sites designated as being of local importance	>800m	The Oakfrith Wood LNR is located 3200m north east.
Agricultural Land Classification	No data is available	There is no data available for Agricultural Land Classification for this area. However, it is greenfield land. The Wiltshire 2012 SHLAA output report notes that it is not currently in use

Heritage considerations

Proximity of site to the following sites / areas	Proximity	Comments
Conservation Area	Site is not within or adjacent to a conservation area	The Market Lavington conservation area is located 330m east of the site.
Scheduled Monument (SM)	Site is not on or adjacent to a SM	
Registered Parks and Gardens	Site is not within or adjacent to a Registered Park and Garden	
Listed buildings	Site does not contain or adjoin a listed building	
Historic Environment Record (HER)	Site not on or adjacent to a HER	

Community facilities and services

What is the distance to the following facilities (measured from the edge of the site)	Distance (metres)	Observations and comments
Town / local centre / shop	>800m	1300m to the Co-op food shop in Market Lavington.
Bus Stop	<400m	150m to bus stop at junction of Park Road and The Spring.
Primary School	<400m 400-800m >800m	1700m to St Barnabas Primary School on Drove Lane.

Secondary School	<1600m	The site is located immediately adjacent to Lavington School.
Open Space / recreation facilities	<400m	The school grounds are located immediately adjacent to the site (these are private) and further playing fields are located 220m south on the opposite side of The Spring Road.
GP / Hospital / Pharmacy	>800m	The Market Lavington Surgery is located 1100m away on the High Street.
Cycle route	<400m 400-800m >800m	There are no National Cycle Network routes in the vicinity of Market Lavington.
Key employment site	>800m	1000m to the Woodlands Yard light industrial site off High Street

Landscape and visual impact considerations

<p>What impact would development of the site have on the surrounding landscape and on important views? Could impacts be mitigated?</p>	<p>The development would have minor impacts on the surrounding landscape and on important views. Canada Woods, to the north of site, should provide screening from agricultural land to the north. Development would be in character with the current land uses found in the sites immediate vicinity.</p>
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Other key considerations

<p>Which Flood risk zone (fluvial) does the site fall within or overlap with?</p>	<p>Zone 3 <input type="checkbox"/></p> <p>Zone 2 <input type="checkbox"/></p> <p>Zone 1 <input checked="" type="checkbox"/></p>	<p>Comments</p>	
<p>Are there any Tree Preservation Orders on the site?</p>	<p>More than one <input type="checkbox"/></p> <p>One <input type="checkbox"/></p> <p>None <input checked="" type="checkbox"/></p>	<p>Comments</p>	
<p><i>Is the site affected by any of the following?</i></p>	<p>Yes</p>	<p>No</p>	<p>Comments</p>
<p>Ecological value? Could the site to be home to protected species such as bats, great crested newts, badgers etc.?</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	
<p>Significant infrastructure crossing the site i.e. power lines/ pipe lines</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>Due to the site location within the School grounds it was not possible to ascertain this information upon site inspection.</p>

Availability

A site is considered to be available if a landowner or developer has expressed an intention to sell or develop the site and that there are no legal or ownership constraints.

Availability

	Yes	No	Comments
Is the site landowner willing to submit the site for development (if known)? Please provide supporting evidence.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site has been put forward as part of the SHLAA call for sites process and is included within the latest (2015) SHLAA register by Wiltshire Council. Further information regarding to the landowner is not currently known.
Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?	<input type="checkbox"/>	<input type="checkbox"/>	Unknown
Is the timeframe for development known? 0-5 years /6-10 years/ 11-15 years?	<input type="checkbox"/>	<input type="checkbox"/>	The time frame for development is not known.

Summary

Conclusions

Site name/number: Lavington School unused fields / site 5

Please mark as appropriate

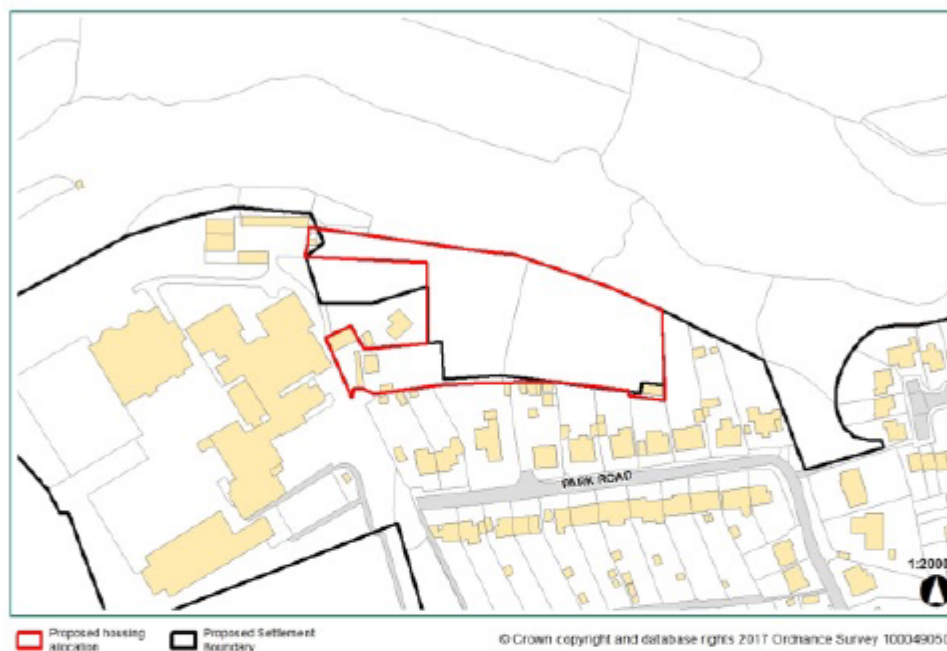
The site is appropriate for development	<input checked="" type="checkbox"/>
This site has minor constraints	<input checked="" type="checkbox"/>
The site has significant constraints	<input type="checkbox"/>
The site is unsuitable for development	<input type="checkbox"/>
Potential housing capacity (number of units)	Unknown
Estimated development timeframe: 0-5 yrs/6-10 yrs/11-15 yrs	Unknown
Recommendation: Site is/isn't suitable, available and achievable	Site is suitable, available and achievable against the criteria set out in DCLG's Planning Practice Guidance.
Explanation / justification for recommendation:	The site has been brought forward as part of the SHLAA call for sites process and as such is available for development, it is in keeping with surrounding land uses

with only minor constraints (such as access).

3. Wiltshire Council has also recognised the site is developable and deliverable, most recently in 2017, as follows:

H1.4 East of Lavington School, Market Lavington

Figure 5.4 H1.4 East of Lavington School, Market Lavington



- 5.36 Approximately 0.6ha of land to the east of Lavington School, as identified on the policies map, is proposed for development of approximately 15 dwellings.
- 5.37 The site is a field at the north-western edge of the village, adjacent to Manor House Woods County Wildlife Site. Proposals must protect the ecological interest of this designation. Where necessary, mitigation measures will be provided. Mature trees and hedgerows must be retained and additional planting will increase habitat connectivity enhancing biodiversity interest. The site is adjacent to an existing residential area and the school (along with the caretaker's residence). Access to the site would need to be shared with the school. Proposals would need to demonstrate that access arrangements, as well as the housing layout, would not have an adverse impact on the operation of the school. A flood risk assessment would be required and appropriate surface water management measures incorporated. Moreover, impacts of development on existing residential properties (and vice versa) would also need to be assessed through the detailed design and layout process.

Richard Greenwood BA (Hons) BPI MRTPI
Director



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2

Appendix

Statement of Common Ground: Site Availability and Deliverability

Land at H1.4 Land to east of Lavington School (03/04/19)

Preamble

1. The Statement of Common Ground has been prepared in relation to Policy H1 and site allocation H1.4 of the emerging Wiltshire Housing Site Allocation Plan (WHSAP). The purpose of the Statement is to provide the Inspector with a summary of the areas of agreement to assist the Examination of the Plan.

Parties to the statement

2. The parties to this Statement of Common Ground are Wiltshire Council and the site promoters, Lavington School.

Land availability

3. The site promoters confirm that the land referred to as H1.4 East of Lavington School, as set out in the WHSAP Policy H1 (WHSAP.01.011 and EXAM.01.012) and as shown in Figure 5.4 (WHSAP.01.01 p39) is under the ownership of one party and will be made available for residential development to ensure delivery within the remaining Plan Period to 2026.

Land capacity

4. The site promoter and the Council agree that land within the site boundary as shown in the proposed policy H1.4 is capable of delivering at least 15 homes and associated infrastructure.

Deliverability

5. The parties are not aware at today's date of any unusual or abnormal development costs affecting the site consistent with the draft WHSAP requirements.
6. On this basis the site is likely to be viable for housing development taking into account the typical costs that housing development in the Plan Area is likely to bear, such as:
 - i. Submitting a scheme that accords with the development plan, including the draft WHSAP;
 - ii. Provision of policy compliant affordable housing;
 - iii. Provision of contributions towards providing, the services and facilities that are necessary, reasonable and proportionate to mitigate the impacts of the development and/or to meet the needs of future residents of the site, in accordance with the CIL Regulation 122 tests; and
 - iv. Provision of acceptable means of sewage disposal and surface water.

1 [WHSAP.01.01] Wiltshire Housing Site Allocations Plan, Submission Version, July 2018

Development Phasing

7. The site is likely to be developed out by one developer at around 7 homes in the first year and around 8 homes in the second.
8. It is assumed for the purposes of consistency that allocated sites would obtain planning permission by September 2020 taking into account that development of this scale always involves addressing several complex factors.
9. The following factors will or may impact on the timing of development on the site or parts of the site:
 - Design and layout
 - Final detailed agreement, as part of the formal consultation process during the life planning application, about surface and foul drainage, with Wessex Water.
10. On this basis the following is agreed to be a realistic site trajectory to deliver the minimum figure for site capacity identified:

19/20	20/21	21/22	22/23	Total
0	0	7	8	15

**Signatories to the Statement of Common Ground for
H1.4 East of Lavington School**

For Wiltshire Council:

Name: Georgina Clampitt-Dix
Position: Head of Spatial Planning
Signed:
Date: 05/04/19

For the site promoters:

Name: Philip Salaman
Position: Governor of Lavington School
Signed:
Date: 05/04/19