

REPORT: 26.110 Planning Application PL/2026/04207 Land East of Church Road, Laverstock
SUBJECT: Submission for Planning Application PL2026/04207 (Up to 110 Houses at Church Road)
Report Author: Cllr. Ian McDonald
DATE: 1st September 2026

1. Report Summary

A report to councillors to approve the Parish Council response submission to Wiltshire Council regarding the above Outline Planning Application.

2. Background

December 2020

An Outline Planning Application was submitted to build 135 houses on a site at Church Road Laverstock, adjacent to Laverstock Down and Cocky Down. The Parish Council strongly opposed the application and submitted its response with reasons on 16th February 2021.

April 2023

A revised application for the same number of houses at the same location was submitted. The Parish Council reiterated its opposition and its original arguments, together with additional arguments supported by evidence in the newly ‘made’ Neighbourhood Plan.

November 2023

As a result of preparing its response to Wiltshire Council on a pre-submission draft Local Plan under a public consultation exercise under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, it became clear that some of the arguments which applied to policy 30 in the draft Local Plan, also applied to the Outline PA and so further arguments, objecting to the PA, were submitted.

February 2024

The developers revised the Outline PA, seeking now to build only “up to 50” houses and claiming the revised application was compliant with the ‘emerging’ Local Plan, policy 30.

April 2024

The developers further revised the Outline PA, amending the proposal to now build “up to 49” houses; adding misleading annotations to the Parameters Plan; and moving the northern access further southwards on a revised Vehicular and Pedestrian Access proposal.

August 2024

Wiltshire Council refused the Application

January 2025

The developers gave notice of appeal on 28/01/2025, against Wiltshire Council’s decision to refuse the Application.

October 2025

The Application was approved on appeal (APP/Y3940/W/25/3359108).

July 2026

Notwithstanding the successful appeal, the developer did not pursue the approved planning application **PA 20/11598/OUT**. Instead, the developer submitted a revised outline planning application, increasing the number of houses from “up to 49” to “up to 110” and including some dwellings of 2.5 and 3 storeys.

3. Summary

The Parish Council has consistently objected to the development of the land on the east side of Church Road, Laverstock, and in doing so has reflected the feelings of residents who submitted 500+ objections to the application in April 2024. As an applicant has no limit on the number of times they may seek planning permission, the history of the applications is listed in the Background for future reference.

The nature of planning and development shifted seismically with the publication of the National Planning Policy Framework (NPPF) in August 2026 and the balance is now heavily tilted in favour of development. This, combined with the already obtained permission on appeal for 49 houses on the site, effectively closes the door on any hope of permanently preventing development. However, the new NPPF and the applicant’s reliance on stale and inadequate data does provide some arguments (including some strong ones) we can still make at local level with the aim of postponing and constraining development.

Councillors should be aware that the author (and any AI assistance used) is not an expert in planning matters and has no planning qualification. While care has been taken to ensure accuracy, the reasons for objection may contain errors.

4. Recommendation

- a) That the Parish Council approves the response of “Object with reasons” to the outline Planning Application PL2026/04207
- b) That the Parish Council approves the text of the submission for PL2026/04207 as set out below.

Laverstock and Ford Parish Council Objects to the Outline Planning Application PL2026/04207 for the following reasons:

1. Procedural Deficit and Reliance on Obsolete Transport Data

The Transport Assessment fails to comply with National Planning Policy Framework (NPPF) (August 2026) Policy TR6(4). It relies on pre-pandemic traffic counts from March 2019, which do not capture current network behaviours or the operational effects of the Church Road Traffic Regulation Order introduced in October 2024. “Growthing” outdated data using TEMPro 8.1 assumes an uninterrupted linear progression and ignores seven years of real-world behavioural, distribution and network changes.

Capacity modelling using JUNCTIONS 10 is therefore based on an idealised network that omits active parking restrictions and altered traffic flows, producing unreliable Ratio of Flow to Capacity (RFC) values. The baseline is invalid, and the resulting impact assessment is speculative rather than evidence-based.

2. Failure to Meet Mandatory Accessibility Requirements

The applicant has not submitted an Outline Site Layout Masterplan. This omission prevents compliance with NPPF 2026 Policy HO5(1)(b), which requires major housing proposals to

demonstrate at outline stage that at least 40% of dwellings meet M4(2) accessibility standards.

Without a layout, the applicant cannot demonstrate that 110 dwellings, including 44 accessible units, can be safely accommodated alongside the Esso high-pressure oil pipeline easement (12–24m wide), and required firebreaks, without forcing a substandard, cramped layout that violates Wiltshire Core Strategy (WCS) Core Policy 57 regarding design quality and spatial adequacy.

3. Insufficient Ecological Mitigation and Habitat Regulation Failures

The application does not satisfy the Conservation of Habitats and Species Regulations 2017. The proposed northern greenspace (2.33ha) cannot accommodate a continuous, high-quality circular walking route meeting Natural England's 2.3–2.5km minimum standard (not overlapping or reversing onto the same pathways). The applicant's own figures (0.75km and 1.5km routes) confirm this deficiency.

Fragmented paths will not divert recreational pressure from the New Forest Special Area of Conservation (SAC). The absence of a masterplan also undermines the Nutrient Neutrality Strategy required under WCS Core Policy 50, leaving risks from surface runoff and pet waste unmanaged.

4. Omission of Critical Traffic Node and Under-Reporting of Vehicle Movements

The Transport Assessment excludes the Laverstock Road / Manor Farm Road junction — a critical node, rendering any micro-simulation or JUNCTIONS 10 model that ignores this node fundamentally flawed. Its exclusion invalidates the applicant's trip distribution matrices, masks the true volume of vehicles heading toward the A36 rat-run, and renders data on capacity, congestion, and cumulative infrastructure risks completely unreliable.

Two nodes are monitored for the Manual Classified Count (MCC) in the Transport Assessment: the A338/A30/Church Road Roundabout and the Bourne Avenue/Laverstock Road mini-roundabout. The critical impact node at Laverstock Road/Manor Farm Road junction is absent. Traffic (including school traffic, buses and traffic originating in Laverstock) entering or leaving via Manor Farm Road has not been recorded at the nodes selected by the applicants. The under-recording errors are therefore compounded throughout the linear modelling process, and the cumulative impacts on the connected sub-standard Milford Mill Road corridor are completely ignored.

Wiltshire Council's own surveys recorded over 41,000 vehicles in 11 days on Manor Farm Road (February–March 2025), averaging 3,727 vehicles per day which represents a traffic volume equivalent to more than 58% of that recorded on Church Road in a traffic speed survey in September 2025 (6,340 vehicles per day).

5: Unmitigated Severe Cumulative Impacts on Sub-Standard Off-Site Infrastructure

The development will generate significant additional vehicle movements through the sub-standard Milford Mill Road corridor. This corridor is constrained by a historic, single-track medieval bridge, severe railway arch clearance limits, and persistent seasonal flooding within the River Bourne floodplain. The applicant has omitted this critical local network route from its study.

Manor Farm Road / Milford Mill Road form a rat-run to the A36 Southampton Road with access to a substantial range of employment and retail opportunities as well as access to the New

Forest and Southampton. Its popular use by Laverstock residents is augmented by Salisbury traffic in both directions. Both roads are subject to 20mph speed restrictions.

Flooding is an intractable problem on Milford Mill Road: Wiltshire Council confirmed to the Parish Council in February 2024 that “The land surrounding Milford Mill Road forms part of the flood plain. The surface level of the carriageway is very little different to that of the surrounding land and as such is prone to flooding. There is a proposed scheme to improve the way that water discharges from our drainage system to the river. While this will make a positive impact on flooding, it will not prevent floods from occurring.”

The cumulative traffic volume from 110 suburban households will worsen structural delays and threaten highway safety along a structurally deficient link, causing a severe residual impact that cannot be cost-effectively mitigated, contrary to WCS Core Policy 62 and NPPF TR6(4).

6: Unmitigated Severe Localized Road Safety Risk to Vulnerable Pedestrians

Laverstock’s highly concentrated school cluster releases approximately 1,900 students simultaneously into a village network of 3,000 residents. The applicant failed to survey the critical 15:00–16:15 school dismissal window, instead sampling only 16:30–18:30. This omission violates NPPF TR6(3). Testing a standard commuter peak when school gates are clear masks the true peak congestion and pedestrian vulnerability window.

The introduction of up to 110 dwellings directly feeding into the concentrated Church Road school corridor creates an unmitigated pedestrian-vehicle conflict during peak school drop-off and pick-up hours, violating NPPF 2026 Policy TR3(1)(c) and TR4(1)(c). During the 15:00–16:15 schools dismissal window, the large volume of students creates a continuous pedestrian stream across the local zebra crossing and the proposed additional crossing. This triggers persistent "pedestrian lock" on Church Road, backing up traffic. Adding the outbound trips from a 110-dwelling development directly into this stalled stream will freeze the network, creating an unmitigated traffic safety hazard.

The applicant’s failure to sample, model, or analyse traffic flows during the afternoon school pick-up period leaves severe safety risks unaddressed and invalidates the sustainable transit assertions.

The scale of development poses a direct threat to the many hundreds of school children navigating Church Road, far exceeding the threshold of a manageable residential extension. In October 2025, the Planning Inspector allowed an appeal (APP/Y3940/W/25/3359108) specifically capping development at 49 dwellings. The infrastructure and traffic mitigations accepted by the Inspector were strictly scaled to that low-yield scheme. A 124% increase to 110 units introduces an entirely new, unmitigated order of magnitude for cumulative infrastructure stress and the applicant has evidenced no infrastructure and traffic mitigations to achieve sustainability at the new scale.

7: Unsound Sustainable Transport Assumptions

The Transport Assessment claims a sustainable layout based on proximity to schools. However, it fails to cross-reference local educational capacity constraints or cross-city travel vectors.

The applicant relies on a 2011 Census data to claim that school trips will remain entirely internal and pedestrian-based. This is demonstrably false. Notwithstanding the Department

of Children's Services (Education) comment (7 August 2026) regarding schools' capacity, due to grammar school allocations and parental preferences, students also travel cross-city and further afield by car or bus. This undermines the applicant's walkability claims and breaches NPPF S5(1)(j)(i), which requires residential growth to be matched by actual infrastructure capacity.

The Travel Plan promises £50 travel vouchers; bus passes; an e-bike hub; an e-car club. These are aspirational, not guaranteed behavioural change. Planning decisions must be based on realistic transport behaviour, not optimistic projections.

8. Incongruous Building Heights and Conflict with Local Design Standards

A modern 2-storey house is generally between 6m and 8m high; a 2.5-storey house, generally between 7.5m and 9.5m high; and a 3-storey house, generally between 9m and 12m high. The houses in the neighbourhood of the site and in the majority of the settlement are single storey and two storeys. The proposal represents an incongruous vertical overdevelopment that fails to respect the low-rise character and form of the settlement, directly violating WCS Core Policies 23 and 57, and the Parish Design Guide, which stipulates a maximum building height ceiling of 10 metres with upper storeys integrated within the roof form.

The site lies 2.5km from the nearest rail hub, far beyond the NPPF's 800m threshold for height-based sustainable transport presumptions. No maximum height is indicated in the plan and no justification is provided for exceeding local height limits.

9: Climate Resilience Failures and Unmitigated Risk to Public Safety

The application is in violation of NPPF 2026 Policy CC3(1)(e). The site plan contains no clearly defined permanent firebreak zone against the wildfire threat from the downs; the planting scheme contains no statement of fire risk mitigation; and the unmitigated road layout and road widths, combined with the number of buildings and extended vertical mass of 2.5 and 3 storeys risk creating wind funnels that propagate and accelerate fire, posing a risk to property and public safety.

10. Landscape Harm and Adverse Impact on Cockey Down SSSI

Footfall surveys for Cockey Down SSSI were conducted in midwinter 2022 during school hours—an artificially low-usage period. This underestimates recreational pressure and risks irreversible harm to protected habitats.

Visitor surveys show 84% of visitors bring dogs, 87% walk dogs off-lead and 47% do not stay on designated paths. The Ecological Impact Assessment acknowledges "Potential for increases in recreational pressure to have adverse impacts upon Cockey Down SSSI." The increase in domestic cat population from 110 houses is estimated to result in the predation of 800 – 1500 small mammals, birds and reptiles annually within a 300m radius.

The proposed SANG is not sufficient to divert residents from the SSSI: it fails compliance with Natural England minimum SANG standards; it is directly adjacent to the SSSI, making displacement unlikely; and it lacks the scale, variety, and separation required to change behaviour.

The SSSI is already in unfavourable recovering condition due to scrub encroachment and lack of grazing. Additional pressure risks irreversible damage to chalk grassland, orchids, butterflies, and invertebrates.

The introduction of extended vertical massing on the gradually rising greenfield topography of the eastern site boundary would introduce a severe visual intrusion. The built volume, proximity and excessive height would create an unmitigated geometric shadow footprint over the soft, natural features of the adjacent Cockey Down Site of Special Scientific Interest (SSSI) during low afternoon sun elevations.

At an afternoon sun elevation of 12° a 10m building casts a shadow of 47m. The sun is at an elevation of 12° or lower for 25% of annual afternoon daylight at the site, creating long and extending shadows from 2pm in winter.

The Landscape and Visual Appraisal acknowledges that the site forms part of the Chalk Downland landscape character area and lies within a Special Landscape Area (SLA). The LVA confirms, “The site is visible from public footpaths on Cockey Down and Laverstock Down.”

The proposal introduces a large suburban extension into a sensitive rural edge, eroding the transition between village and downland. The northern part of the site—proposed as SANG—still results in built form encroaching into open countryside.

By denying a sensitive visual transition into the open countryside and disrupting established panoramic vistas from Designated Parish Viewpoint 10, the scheme causes material harm to the landscape character of the area, in direct conflict with WCS Core Policy 51 and Section 6 of the Parish Design Guide.

The SLA designation requires development to have particular regard to landscape quality. This scheme does not.

11. Unreliable Flood Risk and Drainage Assumptions

The Flood Risk Assessment relies entirely on infiltration SuDS, yet the site contains Head deposits (clay, silt, sand, gravel) which may impede infiltration; groundwater vulnerability is High to Medium-High; and the site is within the River Avon SAC catchment, requiring strict control of runoff quality.

The Parish Council objection here is fully supported by the comments from Drainage (27/08/2026) “The proposed infiltration strategy therefore does not comply with the Wiltshire Council requirements, NPPF, PPG, or National Standards for SuDS.”

Any failure of infiltration systems risks surface water exceedance onto Church Road; pollution entering the River Bourne and Avon SAC; and increased flood risk downstream.

This is a single-point-of-failure drainage strategy.

12. Nutrient Neutrality: Inadequate Phosphate Mitigation and Unproven Off-Site Mitigation

While dwelling numbers more than double compared with the 49-unit scheme, off-site mitigation land increases by only 5.1% (7.05ha to 7.41ha). The applicant has not demonstrated nutrient neutrality for the River Avon SAC, breaching WCS Core Policy 69.

The Nutrient Assessment requires 7.41 ha of temporary fallowing until 2030 and 1.34 ha of permanent fallowing thereafter. This mitigation land is 23.5 km away, disconnected from the development, and dependent on long-term management agreements; future WwTW

upgrades under the Levelling Up and Regeneration Act; and assumptions about infiltration SuDS performance.

This is a high-risk mitigation strategy: it is off-site, remote, and not directly linked to the development; it is aspirational only, relying on future infrastructure upgrades not yet delivered; and it requires perpetual management of land outside the community.

The precautionary principle should apply: if mitigation is uncertain, permission should not be granted.

CONCLUSION:

The proposal for 110 dwellings represents a substantial intensification beyond the already-approved 49-unit scheme, yet the cumulative impact of doubling the scale of development has not been robustly assessed.

The Parish Council objects to Planning Application PL/2026/04207 on the grounds of procedural non-compliance, flawed evidence, ecological risk, infrastructure inadequacy, and conflict with both national and local planning policy. The cumulative deficiencies render the proposal unsound and incapable of supporting a sustainable, safe, or environmentally compliant development of 110 dwellings.