**Planning application PL/2021/09778 the land at Station Works, Station Road, Tisbury, SP36QQ**

**Response from Tisbury Parish Council**

**Introduction**

Tisbury Parish Council objects to this application and asks that permission be refused. Our reasons are as follows:

1. While we support the development of Station Works, in line with the Tisbury and West Tisbury Neighbourhood Development Plan (2019-2036), **this application breaches the plan’s policy BL.7** multiple times These breaches are detailed below. It also breaches policy BL.3 on the development of brownfield sites.

2. **The application itself is inadequate**; it lacks important detail and breaches the NPPF as outlined in our previous comments (now repeated in **appendix 1**)**.**

3 **The proposed development is situated adjacent to a Level 3 Flood Zone**; recent excessive flooding demonstrates our concerns over the impact of the development on the risk of future flooding events, as well as the risk of a lack of accessibility to the site and, in particular, the pedestrian access to the site. Also detailed below.

1. **Reasons for objection relating to Tisbury Neighbourhood Plan policy BL7**

**1.1 BL7.4 The size and scale of the development**

In the Neighbourhood Plan the size and scale of the development is estimated at 60 dwellings in two storey buildings plus commercial uses. The unjustified uplift and mix of housing proposed, and the lack of commercial space is discussed throughout this submission. The application specifies a built form of 2, 2.5 and 3 storey, semi-detached and detached properties which is contrary to the design guidelines contained within Policy BL.7 which specifies 2 storey development. This has implications for the visual integrity of this sensitive landscape where the drive is to enhance landscape setting and character in line with national planning policy. (*See submission from Wiltshire Council Urban Design)*

**1.11 Housing Density and Number of Dwellings**

With a total population of 2,253 (2011 Census) the current population density within Tisbury’s revised settlement boundary is 33 persons per ha. The population density proposed (122 persons per ha) is 3.6 times higher and is twice that in the neighbouring Wyndham estate with the following highly damaging effects:

• It actively frustrates place-shaping by creating a distinct ‘ghetto’ whose form and density contrasts to a remarkable extent with those in the village.

• It fails to secure sustainability – it offers homes which will be substantially inferior in amenity, outlook, space and privacy to those in the village.

Tisbury’s built environment is defined as the area bounded by Tisbury’s settlement boundary, excluding the railway station and the Station Works site, which are not currently considered habitable. Tisbury’s settlement boundary includes roads, private gardens, brownfield and small, integrated public spaces, but excludes playing fields, countryside and parkland which surround the settlement, all of which fall outside the settlement boundary.

The developer proposes 86 new homes and a large, 40-person residential home. The developable land amounts to only 2.02 ha and is bounded on the northern side by a strip adjacent to the railway tracks (reserved for railway expansion) and on the other side by steeply sloping woods. Neither of these features offer any amenity to the site and only add to its cramped nature. A map and supporting information are provided at **Appendix 2.**

Based on Intelligent Land’s own assumption of 2.4 occupants per dwelling (as stated to the public meeting on 27th May 2021) and assuming the 40 residents of the home were housed in dwellings of 2.4 persons per dwelling, this equates to a total of 102 dwellings on the Station Works site, giving a total of 51 dwellings per ha. This compares with a total of 26 dwellings per ha on the recently built Wyndham Estate in Tisbury, which contains 90 dwellings over a total area of 3.44 ha.

The density is also far higher than the indicative figure of between 30 dwellings per ha and 35 dwellings per ha given in Wiltshire Council’s Strategic Housing and Land Availability Assessment (2011) and Strategic Housing and Economic Land Availability Assessment (2017). The upper figure of 35 dwellings per ha was calculated by Wiltshire Council using the evidence of site completions of similar size between 2009 and 2014 in South Wiltshire and was based on a thorough viability assessment. Further details are provided at **Appendix 3** below.

The total of 102 dwellings planned by the developer significantly exceeds the indicative figure of 60 dwellings for the site, plus commercial area, set by the Tisbury Neighbourhood Plan, made in 2019.

The scale of the problem is made clear by calculating the extent to which Tisbury’s population will increase following development. Based on Intelligent Land’s own assumption of 2.4 persons per dwelling and including the proposed 40-bed residential home, the resident population of the site will be 246. The population of Tisbury (2011 Census) was 2,253, meaning that development of the site would increase Tisbury’s population by 11%, a very substantial increase in one go. This may be manageable in a well planned low density development, however this is neither well planned nor low density.

Tisbury’s built area comprises 71.4 ha and the developable part of the Station Works site represents 2.02 ha (2.82% of the current Tisbury village). This means that 10.0 % of Tisbury’s increased population would be boxed into land representing under 3% of Tisbury’s built area. This is simply not acceptable in the interests of quality spatial planning.

**It therefore seems clear that, on any measure, the housing density proposed for the Station Works site is far too high and grossly out of proportion to other parts of Tisbury, being twice that of Tisbury’s recently built Wyndham estate, over 1.5 times Wiltshire Council’s indicative figure, over 1.5 times the figure allocated in the Neighbourhood Plan and over four times higher than that of Tisbury village as a whole.**

**1.12 Policy Considerations on size, scale and density**

The proposed housing density and scale is materially in contravention of Tisbury and West Tisbury Neighbourhood Development Plan Policy BL7 (4) which states, *“the estimated capacity of the site is 60 dwellings in two storey buildings plus commercial uses, but density overall must be appropriate for the edge of a rural settlement in an AONB with the potential to impact on the Conservation Area and two Special Areas of Conservation (SAC) (the River Avon SAC and the Chilmark Quarries SAC).”*

The proposed density of 51 dwellings per ha substantially exceeds the range of 30-35 dwellings per ha indicated for a site of 2.02 ha as set out in Wiltshire Council’s Strategic Housing Land Availability Assessment (2011) and its Strategic Housing Economic Land Availability Assessment (2017).

The proposal contravenes Wiltshire Core Policy 57, which states that development must respond *“positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting.”*

Paragraph 5.146 of the Wiltshire Core Strategy states *that “the Core Strategy will seek to ensure that modest new growth in Tisbury will be sympathetically designed and located so it blends with the village and takes account of the constraints presented by narrow access roads and the sensitive landscape of the AONB.”*

The failure to set a density which takes account of local transport impacts, the well-being of the occupants and the character of the local area conflicts with NPPF Policy 122, which states that decisions should take into account *“the availability and capacity of infrastructure and services - both existing and proposed - as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use”, “the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change”; and “the importance of securing well-designed, attractive and healthy places.”*

**1.2 Policy BL7.3 Pedestrian Access & Policy BL3 Development of Brownfield sites**

Policy BL7.3 states: *“Make provision for an appropriate pedestrian access to and from the new development and the rest of the village; and show how this is to be phased as part of the development.”*

Policy BL7.3 states: *“Proposals for the development of deliverable brownfield sites will be supported subject to…... there being no unacceptable impact on the road network”*

Access is clearly a key issue if the site is to be successful and integrate well with the Tisbury community. There is a real danger that residents in the development could feel cut off and isolated. This is a particular concern with regard to the proposed care home.

It is interesting to note that in a previous planning document (Neighbourhood plan section 14 submission July 2017) Intelligent Land said:

‘*When considering what it would be like to be a resident living on this site, the proposed redevelopment must be questioned. Tisbury residents will be living on an isolated small industrial/business park site within 50-60 metres of a busy, noisy mainline railway with poor pedestrian links, little if any gardens/amenity space and no sense of community. Is this really a vision for village living in the 21st century? This does not, in our opinion, constitute sustainable development as envisaged in the National Planning Policy Framework*.’ (<http://www.tisplan.org.uk/uploads/3/0/3/2/30326353/il_station_works_tisplan_submission.pdf> Page 7)

They also said:

‘*Due to… the isolation and separate location of Station Works and its poor proximity to Tisbury’s facilities and services, … this site is not appropriate for elderly care.’ (ibid Page 5)*

It could be argued that the introduction of the proposed raised pedestrian and cycle path will solve this problem of ‘isolation’. We do not think so. We believe the solution is to build a footbridge over the railway.

We appreciate that there are difficulties to overcome with cost and logistics but a station footbridge is possible and is part of Network Rail’s current strategic plan for the station referenced below (CSSP July 2020). This is the solution supported by policy BL.7 of the Tisbury and West Tisbury Neighbourhood Plan which states “a new pedestrian crossing at the station would facilitate access in the event of the future dualling of the track, as well as ensuring a safe and direct route into Tisbury High Street.”

Tisbury Community Homes have chosen not to build a bridge or to engage with Network Rail on this approach .

Their alternative solution is to put all access at the west end of the site.

We do not support this solution as we believe it will not achieve the necessary integration with the rest of Tisbury. It will also cause new problems that outweigh the advantages of having the site developed.

The chief issues are:

* Pedestrian Access is poorly designed and not adequate.
* Traffic Congestion. The new set of traffic lights with the increased traffic from the site will cause congestion and delays.
* Flooding. The new raised walkway exacerbates the problems of flooding.

**Pedestrian Access**

For the Station Works site to be a success residents must be able to feel they can easily walk into the centre of Tisbury and back, not just for visiting shops during the day but also pubs and clubs in the evening.

In their outline planning application, the developers have indicated that they will fence off access to the Public Right of Way (TISB16) for safety reasons. Furthermore, Network Rail will seek to close the Chantry level crossing citing safety reasons and lack of confidence in the security of any fence put up by the developers. This will leave the residents of the dwellings at Station Works with a walk of between 600 and 900 metres to the shops and amenities of Tisbury High Street. This is beyond the 400 metres considered acceptable for those with impaired mobility, people with young children and the elderly. It is a simple question of distance, with a very likely outcome that people will chose to drive rather than walk. There is also a psychological factor here that probably can’t be measured. Residents will have to walk this distance because they have been fenced in.

Besides the length, the design of the route is also unsatisfactory as it ends at the entrance to the Rail Station with a difficult crossing of Station Road. It should be noted that the continued route into Tisbury is along the pedestrian-only path known locally as the Stubbles path. This is prone to flooding (see picture) in which situation pedestrians would be forced to walk along part of Station Road which does not have a pavement.

To this extent the design is contrary to Policy TR.4 of the T&WTNP which states:

*“Wherever feasible, major new development should contribute to the achievement of a safe, walkable/cyclable village with integrated pathways/ cycleways connecting to its centre and amenities; this might include:*

*1. Circular walking routes*

*2. The protection and expansion of rights of way for footpaths, bridle and cycle paths to encourage sustainable transport patterns within the village and its surrounding areas.*

*3. Improving pedestrian access to and from the High Street using paving that is in keeping with the existing design features of the Conservation Area*

*4. Providing dropped kerbs for users with additional mobility requirements e.g. wheelchair users and pushchairs*

It should be noted that instead of expanding rights of way the development will cause the closure of the Chantry crossing. This loss of footpath is noted by Wiltshire’s Urban Design statement which was widely critical of the access design. (‘Comment on pedestrian /cycle access’, page 3)

The statement notes that the development will not have access to the Chantry Crossing PROW. But in addition to this there is the negative impact that current Tisbury residents will also no longer have access to this footpath. The new development will effectively create a barrier between Tisbury and footpaths to the South; contrary to Policy TR.4 and a considerable loss to the community.

**Vehicular Access**

The proposed raised pedestrian and cycle path involving the closure of one arch of the Three Arch bridge and installation of traffic lights has wide-ranging implications on vehicular access to the site, access to the village of Tisbury, and for the surrounding parishes.

The Parish Councils were concerned that data used by IL to predict traffic flows were inadequate we therefore commissioned our own survey (see ‘Tisbury PC Traffic Survey Report December 2021, now **appendix 5)**. The key results are given below:

* *The developer Transport Assessment (TA) doesn't actually include their traffic count data*
* *The developer traffic counts were conducted during a national lockdown (Nov 20)*
* *It's not clear if the developer traffic counts covered the entrance to the site*
* *The developer has only shared the TRICS outputs for the private residential dwellings (not the Care Home)*
* *The proposed development is estimated to add an additional 413.2 vehicle movements per day (39% increase on current levels).*
* *The Framework Travel Plan doesn't address the impact of the waste removal, construction and building traffic*
* *The TA doesn't address the increased agricultural traffic which use Jobbers Lane at certain times during the year*

There is a further concern that the installation of traffic lights will cause people to take alternative ‘rat run’ routes into Tisbury and the station. An obvious candidate for this is Tisbury Row, a narrow lane.

**Flooding**

The recent heavy floods have highlighted the significant problem this causes at the Three Arch Bridge. Our concerns are shared by the Environment Agency, as they state:

*‘The Environment Agency object to the proposed development due to an unacceptable Flood Risk Assessment (FRA) being submitted with the planning application. This is because the access to the site is located within Flood Zones 2 and 3. The FRA fails to adequately consider the safety of the proposed access/egress route. An assessment in accordance with ‘Flood Risk Assessment Guidance for New Development (FD2320)’ and the supporting ‘Explanatory Note for FD2320 and FD2321’.*

*Whilst the design of the proposed shared pedestrian and cycle route has sought to minimise the impact on flood risk elsewhere, there are still concerns that this could increase flood risk to properties upstream. Given that floodwaters pass through the three arches of the railway bridge any small changes on the conveyance through this structure could have a significant impact upstream. Further evidence is required to demonstrate that the proposals would not have an impact on flood risk elsewhere*. ‘

([Comment: Environment Agency (NRA)'s Comment (wiltshire.gov.uk)](https://development.wiltshire.gov.uk/pr/s/web-comment/a073z00001JbxYcAAJ/environment-agency-nras-comment))

To be clear; there is no quick fix to this problem. If the planning application goes through and the raised pedestrian route is built there could be serious consequences in regard to flooding upstream.

**Conclusion on Pedestrian Access:**

The clear way to make the Station Works integrate and connect with Tisbury is to build a new footbridge. In July 2020 Network rail published their initial proposals for the development of the Tisbury Loop including a footbridge over the track at Tisbury Station in the CSSP **page 64**.

[West of England Study - Continuous Strategic Strategic Planning (networkrail.co.uk)](https://www.networkrail.co.uk/wp-content/uploads/2020/07/West-of-England-Study-Continuous-Modular-Strategic-Planning.pdf)

If this is not the chosen solution the alternative must not be based on expedience or the argument that it is the only alternative. A solution that does not deliver is no solution.

The pedestrian route into Tisbury is too long and poorly designed. Closing one arch of the bridge will cause congestion problems. The impact on flooding along the Nadder Valley cannot be ignored. For these reasons we strongly object to the Access Design aspect of the planning application.

**1.3 Policy BL7.7 Mixed use and loss of employment**

This policy states the requirement to: *“make provision for commercial uses having particular regard for the needs of local and current on-site business, in accordance with policy BL3.”*

**There are no indications that existing businesses will receive any consideration; no provision for alternative accommodation for them has been made and they will likely leave the village.**

The proposal for a care home does not represent mixed use as it is clearly residential. It is also very surprising given that Intelligent Land were previously staunchly in favour of the retention Station Works as an employment site (ref Intelligent Land, “*Comments on TisPlan Pre-Submission Version”* Reg 14. **See Appendix 4**). **Their submission at that time argued specifically that the site was completely unsuitable for a care home.** **We agreed with their submission. We do not know why they have changed their mind. We have not.**

**1.31 Net loss of employment and inclusion of a Care Home**

A 40-bed care home as the only employer on site would displace the existing on-site businesses and would not address the needs of the local community for a mixed commercial offer. There are 30 Full Time Equivalent jobs presently on the site. The 40-bed care home would provide only 12 to 15 - a very substantial loss of employment. **A care home in this location is not appropriate provision for elderly residents wishing to downsize; and it is not supported by the local NHS service.** Please see the submissions from Dr Adam Smith, Rosie Eacott, the Tisbury practice manager, and Teresa Wallace from the Clinical Commissioning Group.

In addition Wiltshire Council Spatial Planning comments as follows:”

*“… the proposals presented appear to be at odds with policy BL.7, insofar as no proposals for commercial employment development are submitted. We would dispute the contention that a care home falls within the commercial employment use that is intended by the neighbourhood plan policy.*

*It is noted that the applicant’s Planning Statement argues that the Station Works site has been in steady decline for some time and due to its locational and site-specific factors the site no longer satisfies modern requirements for many businesses. We would expect the application to be accompanied by evidence of a marketing exercise to support this assessment in order to justify a move away from the policy expectation. This would need to be broadly along the lines of criteria v. of WCS Core Policy 35:*

*With regard to the care home element of the proposal, the requirements of WCS Core Policy 46 do not appear to have been clearly addressed, with regard to demonstrating the need for a care facility in this location*.”

***(extract from WCS CP46)***

*“In exceptional circumstances, the provision of specialist accommodation outside but adjacent to the Principal Settlements and Market Towns will be considered, provided that:*

*viii. a genuine, and evidenced, need is justified*

*ix. environmental and landscape considerations will not be compromised*

*x. facilities and services are accessible from the site*

*xi. its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement.”*

**For the reasons set out above we do not feel there is adequate justification presented within the application as it currently stands to support a deviation from the adopted policy position, with regard to commercial employment provision.**

**1. 4 Policy BL7.5** **Masterplan design and layout**

At the present time, there is no Masterplan, just a draft and inadequate Design and Access Statement which differs from the proposal as now submitted.

Tisbury Community Homes did not engage with the Parish Council in any meaningful way, in order to better understand the vision, needs and aspirations of those who live and work in the community.

**The Parish Councils were informed, but not consulted.**

The document produced by the developer shows a mix of dwellings but there is no provision for employment uses, other than that associated with the proposed Care Home and TisPlan’s requirements for parking provision, in association with Network Rail, have been completely ignored.

It appears that liaison with Network Rail has been brief and last minute. There has been a missed opportunity for the developers and Network Rail to discuss their shared objectives for the future of the Station Works site – and indeed to share the costs of a new, appropriate crossing of the railway line to the benefit of all concerned.

The conclusion from Wiltshire Council Spatial planning is as follows:

*“…. from the material submitted as part of this application it does not appear that consensus has been reached with the parish council/community to the extent that it can be argued that there is an agreed masterplan in place.”*

**We fully agree.**

**1.5 Policy BL7.6 Affordable Housing**

This policy states: *“Make appropriate provision for affordable housing in accordance with Policy BL2. At a minimum level of 30% in accordance with Wiltshire Core Strategy Core Policy 43”*

The developers have declined to fulfil this obligation. This is on the basis of a viability study. (The Affordable Housing Viability Statement **FVA** as defined in *“Assessing viability in planning under the National Planning Policy Framework 2019”* for England, published by RICS)

We challenge the assumptions and therefore the outcome of this viability study. The RICS guidance states that it is the decision maker (Wiltshire Council Planning WCP) that should have regard to how much weight they give to the FVA. The guidance also states that they (WCP) can require the applicant to pay the cost of the assessor to advise as to how much weight to give to the FVA. We do not propose to dispute the values included in the FVA; these are figures that practicing qualified professionals can discuss.

**There** **are assumptions and methodologies used in the FVA which we strongly advise should be challenged.**

Tisbury Community Homes have stated that they will not be undertaking the development but will sell the site after securing Planning. It is therefore in their interest to secure planning permission that delivers a high potential resale value. Thus, it is in their interests to produce a viability study which will reduce S106 obligations thereby increasing the resale value of the site.

A site having the potential to deliver a substantial number of homes should provide the appropriate benefits for the community. Below are comments where we would challenge the FVA.

**1.51 Existing Use Value (EUV)**

Page 25 of the viability report explains the methodology behind the EUV in the report which is used to provide the Benchmark Site Value (BSV). BSV is a theoretical value and, artificially manipulating it upwards will cause the viability model to produce a negative result. We contend that this is what has occurred in this case.

1. The purchasers acquired the site for £925,000 in 2019. At that time, the Tisbury Neighbourhood Plan was in the public arena and thus the constraints on the site were well known. Arguably, this purchase represented a value that included hope value. Since purchase there has been NO investment in the site and the Covid 19 pandemic has had a major downward impact on commercial property values. Therefore, we question why the applicant feels the site has increased in value over two years by nearly 90% to give a Benchmark Site Value (BSV) of £1,750000. **This is simply not credible.**
2. The EUV valuation needs to be challenged. The warehousing area has leases which have or are due to expire. They are subject to rolling breaks; it is questionable that the yield reflects that. The offices are stated as having floor area of 3018 sq. ft. The FVA states that only part of the ground floor is occupied, with the remainder unoccupied and in poor condition. There is no evidence to suggest the FVA reflects the holding cost of vacant property or the costs of bringing it to a condition suitable for letting.
3. The open storage space is compared with sites having good accessibility to the M4. These values are not appropriate for a site in a rural location with poor road access.
4. Checking their final calculations, the developers use a benchmark for an industrial land value of £400,000 per ha (2014). However only 2.02 ha have any value at all (the rest is too steep for anything or given over to the railway). At 1.6% per annum, compound growth in industrial land value since 2014, we have a present day benchmark figure of £437,000 per ha, which produces a Benchmark Site Value (BSV) figure of £882,000. This is much closer to the price actually paid for the land and a more realistic BSV.

**We therefore believe the EUV and thus the BSV are clumsily overstated in order to avoid Affordable housing responsibilities.**

**1.52 Sales Values:**

The Viability Report identifies a number of developments where comparison can be made with regard to future sales values. It is not our intention to agree or disagree with any of these figures.

The report was submitted in September 2021 and as this submission is made towards the end of November 2021, the information may well have changed. There are now developments by Taylor Wimpey in Gillingham or Bloor in Amesbury which could be included if written today. Page 22 of the report comments that the effect of Covid is not known on house prices. There is clear evidence of a permanent shift in working patterns and a “move to the countryside” since lockdown. Current forecasts predict continued increases in house prices, albeit at a slower rate. **The RICS guidance states the valuation date of the FVA should be the date of the decision. Full regard should be given to any current house price information at that time.**

There is nothing in the developer’s viability report to demonstrate the impact on the appraisal of increases in house prices. A 5% increase would add a £1m of additional revenue. The potential income from house sales figures need close scrutiny as a small change can make a very significant difference to the outcome.

**1.53 Abnormal Costs**

The build costs have been taken from industry indices. There are other costs which have been included which are taken from specialist reports. Whilst the reports relating to abnormal costs do not demonstrate any particular issues, the remediation costs report by Ridge does. Page 46 of their report sets out options for decontamination and recommends Option 3 as the most cost-effective solution. But In their I Viability Report IL use the most expensive option priced at £750,000. The reason cited is that there is a high level of risk. The Ridge report had already included a risk assessment. and there does not seem to be a reason why IL use the higher figure other than to artificially manipulate the viability report. This requires explanation.

**There is no support presented anywhere in any document for the figure of £750,000 in remediation costs. We contend that it is a “made up” figure.**

**1.54 Profit margin**

The FVA refers to the RICS Guidance, where 15% - 20% profit level is acceptable. That guidance also states that for affordable housing a lower level of risk can be considered. The planning authority should consider whether the scheme should remain within the range of 15% - 20%. Using the appraisal supplied, if the land value from scenario 2 is substituted into scenario 1 then this gives the scheme a profit level of 13%. A further reduction in costs of £400,000 (see Abnormal costs above) takes the profitability to 15%.

**It is acceptable to have an affordable housing profit level lower than 15%. With a blend between the two types of housing the profit level should easily be within the guidance.**

**1.55 Sensitivity:**

The RICS Guidance requires the inclusion of a sensitivity analysis to demonstrate the effects on costs and revenues to changes in forecast. It has not been included in the FVA.

**1.56 Conclusion on viability study:**

The 2019 Tisbury housing needs survey by Wiltshire Council identifies the shortfall of affordable housing in Tisbury. There is a genuine need, which is proven. Any residential housing scheme, and certainly proposals of this scale should contribute to satisfying that need. As we have pointed out above, the Tisbury and West Tisbury Neighbourhood Development plan (regulation 16 version) was already in the public domain when the owners purchased this site. All site constraints and statutory responsibilities were known at that time and should have been taken into consideration in the price paid. Further, the owners had the opportunity to challenge the plan during the examination stage. It is disingenuous of the owners to suggest now that these responsibilities cannot now be afforded.

**The viability report is misleading in a very clumsy way, inadequate, especially in regard to a sensitivity analysis, and is not consistent with other reports in the planning application. It lacks credibility and we believe it is written in the belief that it would not be energetically challenged. We ask that Wiltshire Council scrutinise this Affordable Housing Viability Statement very closely and that the assumptions behind it are challenged.**

**1.6 Policy BL7.9 AONB considerations**

The policy states that “the development must reflect the site’s setting within the CCWWD AONB and its proximity to the conservation area. The developer has yet to seek advice from the AONB. In an AONB, the design should be landscape-led but it appears the landscape consultant has merely been employed to do an LVIA. In any case the LVIA has not been done to standard and no exception statement for major development in an AONB (NPPF para177) has been produced **(see Appendix1**)

The lighting consultant does not appear to appreciate that the AONB is an International Dark Sky Reserve and that compliant lighting will be required for that, as well as the Habitats Assessment. The lighting report seems fundamentally flawed as it says it is based on Lighting Environmental Zone 2, when in an AONB it should be Zone 1, and in a Dark Sky Reserve an argument can even be made for Zone 0.

**We refer you to the submission by the AONB for further comment.**

**1.7 Policy BL7.10 Design Standards.**

This policy states that “development should be of a very high design standard reflecting the predominant local vernacular eg. the use of local brick and stone building.

The urban design as proposed clearly does not reflect the site’s location in a highly visible edge of village situation in an AONB. There is no mention of sustainability, use of local materials, orientation of dwellings to facilitate the use of solar panels etc. All these details have been left to subsequent planning applications but nevertheless they require determination to give proper consideration to the vexed question of the design of the access.

**The application falls well short of the required standard as confirmed by comments from Wiltshire Council Urban Design and Mr Andy von Bradsky. We refer you to both of those submissions.**

**1.8 Policy BL.7.12 Environmental impact**

This policy states *“development should strive to have a minimal (approaching zero) environmental impact “*

We can see no evidence of any environmental impact study on the proposed increased scale of development which is far larger than that indicated in the Neighbourhood Plan.

**1.81 Effects on River Nadder.**

*“The River Avon and its tributaries are of national and international importance for their wildlife communities. The Wiltshire tributaries, of interest in their own right and with contrasting geologies, are included primarily on account of their importance, with the Avon itself, for internationally rare or threatened species (Ranunculus vegetation, sea lamprey, brook lamprey, bullhead, Atlantic salmon and Desmoulin’s whorl snail) (Strategic Environmental Assessment 2019)” (AECOM consultancy)”*

ABR Ecology were commissioned to provide an **Ecological Impact Assessment** in which they quote email correspondence with Mary Holmes (Wiltshire Council Ecologist) (p15) from 22.10.20 in which she says that there is a requirement to provide a full Habitats Regulation Assessment adding “With r*espect to phosphate all residential development is currently on hold.”* P34 of the EIA further states that the: *“River Avon SAC may be vulnerable to wastewater nutrient impacts from the development.”* The River Nadder is of County importance and is described as unfavourable but recovering (p35) and at points lies within 13m of the proposed development. (Unfavourable is the state where a special feature or features -the qualifying species or associated habitats of those species - are not being conserved or are being lost, meaning that without appropriate management the site will never reach a favourable or recovering condition. (Natural England definitions*:*[*https://www.gov.uk/guidance/protected-areas-sites-of-special-scientific-interest*](https://www.gov.uk/guidance/protected-areas-sites-of-special-scientific-interest)*).*

P60 of the report describes *“possible significant negative impact on the River Nadder”* from the development and states that a Remediation Method Statement and Environmental Risk Assessment is needed.

**Although provided these do not appear to address the effect on the River Nadder of increased phosphate levels.**

**The Habitats Regulation Assessment** phosphate levels are addressed. It states that stretches of the SAC are in unfavourable condition and failing to meet its conservation targets. The modelling for the housing allocations indicates housing delivery has exceeded growth anticipated in the Nutrient Management Plan (NMP) (Which Natural England and Environment agency have said cannot be relied on 8.2.2) and is further increased by new allocations. It states that elevated phosphate levels can be detrimental to chalk river systems which rely on nutrient poor conditions to support several of their qualifying features (5.4.5). It predicts an increase of 2,599kg of phosphate (P) or average of 371kgP per year from sewage treatment works in the catchment (WC, 2020) but the proposed increase would be an extra 10.39 kg P per year. (3% of the modelled prediction for the whole catchment area).

The Assessment states that Wessex Water strips the vast majority of P from sewage at their sewage treatment works in line with their Environment Agency permit before discharge into the river but does not quantify this. However, in 2018 Natural England and Environment Agency advised the council that it cannot rely on the Nutrient Management Plan (NMP) from 2015 to offset the remaining P. Therefore, development within the entire catchment must demonstrate it will be P neutral (WC, 2020).At8.5.1 it concludes that in view of NE and the EA’s advice, all allocations in the catchment must be assumed to give rise to effects alone as the river is already not achieving its conservation objectives (WC, 2020). 8.5.2

The proposed development is considered likely to result in a significant effect both alone and in combination with other developments in the area. Therefore, further scrutiny is required as part of an Appropriate Assessment.

**The River Avon Nutrient Management Plan and the River Avon SAC Phosphate Interim Delivery Plan** discuss how elevated levels of phosphates are detrimental to the river.  (Table 1) It clearly states that the proposed development would adversely affect the distribution, structure, function and populations of habitats and qualifying species within the River Avon SAC. These adverse effects do not seem to be addressed through mitigation or avoidance measures. There is reference to the Ecology Impact Assessment that was commissioned to inform the Neighbourhood Plan but that was working on the basis of 60 houses (not 86) and a mixed development that did not include a 30-40 bed care home.

**We strongly request that a new independent HRA Ecology Impact Assessment is commissioned to evaluate the environmental impact of the proposed significant increase in the scale of development over that estimated in the Tisbury Neighbourhood Plan.**

**1.9 Policy BL7.1**

This policy states *“Proposals should be informed by a contaminated land survey and remediation scheme, the level of information provided to be in line with the Wiltshire Core Strategy”.*

**We refer you to the objection submission from the Environment Agency**

**1.10 Policy BL7.2**

The policy states *“Liaise with Network Rail* [*(and*](file:///C%3A%5C9and) *other parties as required) to identify and safeguard land to meet their current and future operational requirements including appropriate access and parking provision for the southern side of the line”.*

**We find it hard to see where there has been meaningful consultation with the railway authorities, especially with regard to parking and a safe rail crossing at Tisbury Station. We refer you to the submission from Network Rail.**

**2. Inadequacy of the application**

Tisbury Parish Council wrote to the planning authority **(see appendix 1)** whilst considering this application pointing out serious breaches of the NPPF and shortcomings in the documentation supplied as follows:

* The LVIA doesn’t meet the Landscape Institute standards (GLVIA 3) or follow Landscape Institute guidance on LVIA visualisation; “*The Representation of Development proposals”.*
* Community engagement & consultation has been inadequate. (See Wiltshire Council Spatial Planning submission)
* The masterplan is inadequate (see submission from Wiltshire Council Spatial Planning)
* The HRA can only be carried out by an “appropriate authority” not the applicant. Although the document states that it has been prepared to “help” the LPA, the council need to be transparent in preparing an independent HRA for the proposal.
* The Planning Statement does not have a comprehensive planning policy section which sets out the policies relevant to the redevelopment of the Station Works site and how the proposal is in conformity with those policies.
* There isn’t adequate justification for not proposing a mixed-use development as required by the allocation; a separate employment need assessment is required. (see Wiltshire Council Spatial Planning submission)
* The proposal inadequately addresses the requirement for biodiversity net gain.
* There is insufficient detail on layout, design, scale and massing to assess the impact on the AONB and Conservation Area.
* The site lies within the AONB and the proposed development is *a “major development”*, The scale of development proposed does not align with the allocation and so an exceptions test as set out in the NPPF should be provided. The applicant has not provided an “exceptional circumstances” report. Paragraph 177of the NPPF states:

*“When considering applications for development within … National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*

*a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

*b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*

*c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

**All these deficiencies need to be addressed before the impact of the proposals can be properly assessed.**

**3. Flooding**

The environment Agency has rightly drawn attention to the impact of flooding on the proposed pedestrian access. Tisbury Parish Council wish to add to that comment by showing the effects of flooding on not only the three-arch bridge (Photo 2) but on the Stubbles footpath, to which the proposed pedestrian walkway connects in order to complete the journey by foot to the village. The effect of flooding on Stubbles footpath is not included in the Environment Agency comments. As can be seen the path is impassable and dangerous during flooding (photo 1).**Photo 1:** Stubbles path looking north from Station Road. Flood water from overnight rain has rendered it impassable and dangerous. 08.00 am 21st October 2021

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**Photo 2:** Flooding at 3 Arch Bridge after overnight rain. 08.00 am 21st October 2021

**4. Overall Conclusions of Tisbury Parish Council**

Having reviewed the application, we consider that, while we wish to see the site developed, this application should be refused for the following reasons:

1. **The proposal does not conform to the policies outlined in the Tisbury and West Tisbury Neighbourhood Development Plan (Tisbury NDP allocation), including but not limited to:**
	* The excessive scale of development proposed
	* Inappropriate pedestrian and vehicular access
	* Policy BL.3: The development of brownfield sites
	* The potential employment loss
	* The requirements for an acceptable Masterplan are not met
	* It proposes a major development in the AONB without appropriate justification.
	* It fails to demonstrate how the proposal conserves and enhances the AONB
	* It fails to assess the environmental impact of development particularly on the River Nadder
	* It fails to engage sufficiently with Network Rail
2. **There has been Inadequate community engagement.**
3. **The proposal has not been informed by an agreed masterplan.**
4. **The proposal has failed to provide adequate documentation and breaches the National Planning Policy Framework; Environmental concerns for the Nadder River are not satisfactorily addressed and no independent HRA is supplied.**
5. **Inadequate consideration is given to the impact the development will have on the adjacent Level 3 flood zone and any increased flooding risk, particularly on pedestrian access between the site and the village.**

**Site Photos**

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 **Photo 3: View from east at PROW (Public Right Of Way) : The site is long, narrow and enclosed on three sides increasing**

**the risk of a high density development**

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**Photo 4: Station Works: view from the southwest showing the steep slope along the southern edge**

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**Photo 5: Slope with retaining wall taken from PROW at NE end of site**

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Photo 6: Full width of the site at NE end showing railway line and retaining wall. Taken from PROW

**Appendices**

Appendix 1: Inadequate application

Letter from Tisbury Parish Council to Richard Hughes dated 17th November 2021

**Planning application PL/2021/09778 the land at Station Works, Station Road, Tisbury, SP36QQ**

Dear Richard

The Tisbury Parish Council has been compiling its response to the planning application PL/2021/09778. Having had an opportunity to study the submission in detail and take the advice of our planning consultant we wish to draw your attention to shortcomings in the submission, a number of which we consider are fundamental to the proper consideration of the application.

Although the application is in outline with all matters reserved (except for access) the site lies within the AONB and adjacent to the Conservation Area and any application in such a sensitive location must be accompanied by the level of detail necessary to properly assess the impact of the proposal.

The Parish Council has identified the following deficiencies in the planning submission:

* The LVIA doesn’t meet the Landscape Institute standards (GLVIA 3) or follow Landscape Institute guidance on LVIA visualisation -The Representation of Development proposals.
* The masterplan submitted is inadequate.
* The proposal is not accompanied by a Design Code and there is insufficient information to be satisfied that he proposed approach to design will be of the high quality necessary in this location. (Paragraphs 126-134 NPPF 2021 (as updated))
* The Planning Statement does not have a comprehensive planning policy section which sets out the policies relevant to the re development of the Station Yard site and how the proposal is in conformity with those policies.
* There isn’t adequate justification for not proposing a mixed use development as required by the allocation policy and a separate employment need assessment is required.
* The proposal does not adequately address the requirement for biodiversity net gain.
* There is insufficient detail on layout, design, scale and massing to assess the impact on the AONB and Conservation Area.
* The site lies within the AONB, and the proposed development is “major development” within the AONB, and the quantum of development proposed does not align with the site allocation policy therefore exceptions test set out in the NPPF should be provided. The applicant has not provided an “exceptional circumstances “report. Paragraph 177of the NPPF states:

“When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

General Observations:

An HRA can only be carried out by an “appropriate authority” not the applicant. Although the document states that it has been prepared to “help” the LPA the Council need to be transparent in preparing an independent HRA for the proposal.

The proposal due to its sensitive location should have been the subject of design review. (Paragraphs 126-134 of the NPPF 2021 (as updated))

The Parish Council is firmly of the opinion that due to the number and nature of the shortcomings the applicant should be persuaded to withdraw the application and resubmit when the application is complete, as it would not be appropriate for the issues raised to be dealt with in a piecemeal fashion. In addition to our concerns, it is clear from the Environment Agency’s objection that they consider that the application is not of a satisfactory standard with regard to flood risk, drainage and land contamination. These issues must be addressed before the impact of the proposals can be properly assessed. We look forward to hearing from you.

Joint Working Group

Tisbury Parish Council.

Appendix 2: APPENDIX B – STATION WORKS BUILT ENVIRONMENT

 The map below highlights the total area of the land owned by Tisbury Community Homes Ltd and the subject of the application (outlined in light blue). This total area is 4.12 ha (including surrounding countryside and the land allocated for railway expansion).

It also shows the much smaller area – only 2.02 ha - of the proposed development (shaded in light red), which excludes steeply sloping woodland and surrounding countryside and the land reserved for expansion of the railway line by Network Rail.



Appendix 3 : Indicative Housing density

The table below appears in Wiltshire Council’s Strategic Housing and Economic Land Availability Assessment 2017 and is based on completed developments in South Wiltshire between 2009 and 2014. Larger sites are shown to be associated with lower housing densities, to enable the necessary space for public amenity and recreation.



**Appendix 4 : Intelligent Land’s submission to the Tisbury Neighbourhood Plan on the Non-Viability of a Care Home on the Station Works Site (July 2017)**

“……..Policy BL4 allocates the site at Station Works for ‘comprehensive redevelopment’, but the quantum of the various proposed uses is not given. It is also unclear as to whether ‘elderly care, continuous living complex with on-site provision for care and recreation’ is part of the 24 additional units (identified elsewhere in the plan) to be provided, or as it’s a separate use class is it in addition to the new market housing? This requires clarity.

Wiltshire Core Strategy Policy 46 addresses the needs of Wiltshire’s vulnerable and older people. It states that such accommodation should be provided in sustainable locations, where there is an identified need, within settlements identified in Core Policy 1 (normally in the Principal Settlements and Market Towns) where there is good access to services and facilities. Tisbury is not a principal settlement nor market town, but a local service centre. Policy 46 deals with such circumstances by stating, *“In exceptional circumstances, the provision of specialist accommodation outside but adjacent to the Principal Settlements and Market Towns will be considered, provided that: - a genuine, and evidenced, need is justified - environmental and landscape considerations will not be compromised - facilities and services are accessible from the site - its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement.”* It is contended that due to the lack of evidence in the neighbourhood plan to substantiate this part of the policy as well as the isolation and separate location of Station Works and its poor proximity to Tisbury’s facilities and services, that this site is not appropriate for elderly care.

Further, Dudsbury Homes Southern has received correspondence from three specialist leading developers of older person housing (Churchill, Renaissance and McCarthy Stone) which states that the Station Works site is not considered suitable given its proximity to the rail station and its isolation from the services and facilities of Tisbury. If a provider for this specialist use could not be found, this would present a further barrier to delivering development ….. It would be far preferable for this site to remain with its current land uses, with some enabling employment redevelopment to both improve its employment offer and make it more attractive. Locating residential development, as proposed in the neighbourhood plan, on a site with B2 and B8 uses would be unacceptable in planning and residential amenity terms.

There is no evidence presented to demonstrate that there is no longer a need for the quantum of B2 or B8 uses at Station Works nor how much will remain under the redevelopment proposals and how that will satisfy need or Wiltshire Core Strategy policy. Indeed, there are businesses currently on the site which would indicate there is a need. Further, when considering the site for housing, Wiltshire council has stated, *“Although the site could become available, and housing could be delivered, it is identified in the Employment Land Review (ELR) as an employment site. The ELR also identifies that there is an opportunity to redevelop all or part of the site to provide a greater amount of purpose-built business space for B1 or B2 use. This is one of Tisbury’s last remaining employment sites, as the village functions as a local service centre, and should be protected to ensure the continued sustainability of Tisbury. The site represents one of the last employment sites in Tisbury and should be retained as such. The landowner should be encouraged to intensify and redevelop the site with modern business space.”*

Government policy, set out in the National Planning Policy Framework (paragraph 22) acknowledges that land allocations should be regularly reviewed and should not be protected in the long term where there is no reasonable prospect of a site being used for that purpose*, “having regard to market signals and the relative need for different land uses to support sustainable local communities”*. By definition this cannot apply to sites that are in use. Such sites should therefore be protected and in turn support sustainable local communities. Redeveloping the site to make it a more attractive employment site, without losing its array of employment uses, would be a more viable option as decontamination would not be required nor would a new bridge across the railway line. It would also present more opportunities to safeguard space for dualling the railway line and providing a second platform. The proposed redevelopment of this site to remove some valid and sustainable employment land uses from an appropriate existing site are contrary to the National Planning Policy Framework and the Wiltshire Core Strategy.

**Tisbury Parish Council accepted this advice from IL when we drafted our Neighbourhood Plan and do not know why Intelligent Land have changed their mind on this key issue.**

Appendix 5: Tisbury PC Traffic Survey Report December 2021.

1. Traffic Counts

The Tisbury Station Works Transport Assessment (TA), September 2021 refers to an Automatic Traffic Count (ATC) undertaken between 26th November and 4th December 2020 on Jobbers Lane, between the railway bridge underpass and the current southern arm of the Site access. There is no mention a traffic count covering the vehicles currently entering/exiting the site. Because of this, the TA does not provide details of the current situation at the site (used as a baseline for TRICS estimates).

The TA does not include any traffic count data recorded by the ATC; it appears that the data was only used to obtain vehicle speeds. The ATC was conducted during a period of Nation Lockdown (5th November to 2nd December 2020)[[1]](#footnote-1) and therefore it is considered that any data collected would not be representative of vehicle movements.

To understand the current situation, Tisbury Parish Council commissioned traffic counts at the entrance to site. Two separate surveys were between Tuesday 23rd and 29th November 2021 (Entering/Exiting the site) and 24th to 30th November (Passing the site). The counts were delayed due to the rail crash at Salisbury on 31st October. Rail services between Salisbury and London Waterloo were suspended until 16th November, services from Tisbury terminated at Salisbury during this period.

The traffic counts covered both the entrance/exit to the site as well as the vehicle movements on Jobbers Lane. It is assumed that the vehicle movements recorded are still below the pre-Covid 19 traffic levels which may be reached again once all Covid restrictions are lifted in the future.

* 1. Entering/Exiting the site

The Table below shows the number of vehicles recorded entering and exiting the site between 07:00 and 19:00 hrs during each day of the survey. The count was conducted over 24 hours each day, but the data has been reduced to 07:00 - 19:00 hrs to align with the TRICS output.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Mon | Tue | Wed | Thu | Fri | Sat | Sun | 5 Day Avr | 7 Day Avr |
| Entering | 16 | 27 | 24 | 23 | 23 | 23 | 4 | 22.6 | 20.0 |
| Exiting | 18 | 27 | 24 | 28 | 29 | 29 | 3 | 25.2 | 22.6 |
| Total | 34 | 54 | 48 | 51 | 52 | 52 | 7 | 47.8 | 42.6 |

The count shows that the average number of vehicles entering (Mon-Fri, 5 Day average) was 22.6 and exiting was 25.2 (47.8 vehicle movements in total). The seven-day averages were 20.0 entering and 22.6 exiting (42.6 movements in total). There were considerably less vehicle movements on Sunday this may be due to local road closures in the area on 28th November.

The graph above shows that, although the average number of vehicle movements recorded were small, the pattern follows that of a workplace. The majority of vehicles enter the site in the morning and the majority of vehicles exit the site during the afternoon.

* 1. Total Movements

The Table below shows the number of vehicles recorded on Jobbers Lane, eastbound (from Tisbury) and westbound (towards Tisbury) between 07:00 and 19:00 hrs each day.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Mon | Tue | Wed | Thu | Fri | Sat | Sun | 5 Day Avr | 7 Day Avr |
|  | East | West | East | West | East | West | East | West | East | West | East | West | East | West | East | West | East | West |
| 0700-0800 | 1 | 1 | 22 | 24 | 42 | 46 | 25 | 29 | 29 | 35 | 8 | 8 | 3 | 3 | 23.8 | 27.0 | 18.6 | 20.9 |
| 0800-0900 | 2 | 2 | 46 | 54 | 74 | 91 | 71 | 88 | 51 | 56 | 30 | 32 | 3 | 3 | 48.8 | 58.2 | 39.6 | 46.6 |
| 0900-1000 | 2 | 2 | 37 | 41 | 48 | 56 | 49 | 60 | 55 | 65 | 35 | 38 | 0 | 0 | 38.2 | 44.8 | 32.3 | 37.4 |
| 1000-1100 | 28 | 33 | 32 | 35 | 56 | 73 | 46 | 50 | 39 | 48 | 51 | 65 | 12 | 13 | 40.2 | 47.8 | 37.7 | 45.3 |
| 1100-1200 | 21 | 24 | 30 | 31 | 41 | 43 | 45 | 52 | 47 | 55 | 39 | 49 | 22 | 22 | 36.8 | 41.0 | 35.0 | 39.4 |
| 1200-1300 | 27 | 30 | 29 | 33 | 49 | 57 | 37 | 41 | 54 | 58 | 50 | 62 | 29 | 29 | 39.2 | 43.8 | 39.3 | 44.3 |
| 1300-1400 | 45 | 50 | 30 | 30 | 53 | 66 | 50 | 58 | 33 | 34 | 44 | 56 | 28 | 29 | 42.2 | 47.6 | 40.4 | 46.1 |
| 1400-1500 | 60 | 67 | 29 | 33 | 38 | 44 | 55 | 64 | 60 | 69 | 35 | 38 | 19 | 22 | 48.4 | 55.4 | 42.3 | 48.1 |
| 1500-1600 | 46 | 53 | 53 | 65 | 54 | 66 | 70 | 85 | 73 | 90 | 42 | 42 | 30 | 33 | 59.2 | 71.8 | 52.6 | 62.0 |
| 1600-1700 | 44 | 50 | 47 | 57 | 53 | 65 | 53 | 67 | 57 | 77 | 37 | 42 | 23 | 24 | 50.8 | 63.2 | 44.9 | 54.6 |
| 1700-1800 | 13 | 14 | 34 | 38 | 42 | 49 | 42 | 50 | 42 | 51 | 25 | 26 | 15 | 16 | 34.6 | 40.4 | 30.4 | 34.9 |
| 1800-1900 | 14 | 16 | 26 | 28 | 37 | 41 | 32 | 36 | 32 | 38 | 18 | 23 | 11 | 11 | 28.2 | 31.8 | 24.3 | 27.6 |
| Total by direction | 303 | 342 | 415 | 469 | 587 | 697 | 575 | 680 | 572 | 676 | 414 | 481 | 195 | 205 | 490 | 573 | 437 | 507 |
| Total Movements | 645 | 884 | 1284 | 1255 | 1248 | 895 | 400 | 1063.2 | 944.4 |

The count shows that the average number of vehicles recorded on Jobbers Lane (Mon-Fri) was 1,063.2 (490 eastbound and 573 westbound). The seven-day average was 944.4 (437 eastbound and 507 westbound).

The graph below shows the five-day average no. vehicles by direction by hour. This shows peaks at 08:00 – 09:00 (48.8 eastbound and 58.2 westbound) and 15:00 – 16:00 (59.2 eastbound and 71.8 westbound).

* 1. Current Model

The table below shows the model of current vehicle movements as observed during the traffic count period. The Total Movements and Entering/Exiting figures are based on the five-day average figures from both data sets.

The average number of vehicle movements (combined east and westbound) per day is 1,063.2. Of which 22.6 movements on average, enter the site and 25.2 exit between 07:00 and 19:00 hrs, therefore the proportion of vehicle movements on Jobbers Lane entering the site were 2% and exiting 2%.

|  |
| --- |
| Current vehicle movements (observed) |
| Time | Total Movements | Entering | Exiting |
| 0700-0800 | 50.8 | 1.4 | 0.6 |
| 0800-0900 | 107 | 3.8 | 0.6 |
| 0900-1000 | 83 | 3.6 | 2.6 |
| 1000-1100 | 88 | 3 | 2.4 |
| 1100-1200 | 77.8 | 3 | 2 |
| 1200-1300 | 83 | 1.8 | 2.6 |
| 1300-1400 | 89.8 | 2.8 | 1.2 |
| 1400-1500 | 103.8 | 1.4 | 2.4 |
| 1500-1600 | 131 | 0.4 | 3.6 |
| 1600-1700 | 114 | 0.6 | 2.8 |
| 1700-1800 | 75 | 0.4 | 3.2 |
| 1800-1900 | 60 | 0.4 | 1.2 |
| Total | 1,063.2 | 22.6 | 25.2 |
| Average |  | 2% | 2% |

1. TRICS Estimate

The Tisbury Station Works Transport Assessment includes references to the TRICS (Trip Rate Information Computer System) database. Two sets of land use data are included in the appendix of the TA covering privately owned houses and flats, however the data for the Care Home is not included in the appendix (although it is refenced in the main body of the document).

The summary data in the TA refers to the AM Peak Period (08:00 – 09:00) and PM Peak Period (17:00 -18:00) as well as the daily trip rate. As mentioned above, the observed PM peak period for Jobbers Lane is 15:00 – 16:00. It is therefore suggested that the TRICS data should be revisited by the applicant to reflect the observed data.

* 1. Private Homes & Flats Model

Without the full data set for the Care Home, it is not possible to create a full model of the vehicle movements after the proposed site is occupied. The model below therefore only includes the observed base data and the TRICS estimate for private homes and flats.

|  |
| --- |
| Estimated vehicle movements (Observed plus TRICS estimate for private homes and flats) |
| Time | Total Movements | Entering | Exiting |
| 0700-0800 | 75.5 | 5.4 | 21.3 |
| 0800-0900 | 138.7 | 9.7 | 26.5 |
| 0900-1000 | 102.5 | 12.0 | 13.7 |
| 1000-1100 | 106.7 | 10.7 | 13.4 |
| 1100-1200 | 96.3 | 11.1 | 12.3 |
| 1200-1300 | 102.8 | 12.3 | 12.0 |
| 1300-1400 | 111.9 | 13.3 | 12.8 |
| 1400-1500 | 127.0 | 12.2 | 14.8 |
| 1500-1600 | 159.2 | 19.3 | 12.9 |
| 1600-1700 | 143.1 | 20.2 | 12.3 |
| 1700-1800 | 106.6 | 23.5 | 11.6 |
| 1800-1900 | 89.1 | 19.4 | 11.3 |
| Daily Trip Rate | 1,359.4 | 169.1 | 174.9 |
| Average |  | 12% | 13% |

The table shows that the proposed 86 residential units are estimated to generate 169.1 vehicle movements entering the site between 07:00 and 19:00 hrs (Monday to Friday) once occupied and 174.9 exiting. This will increase the total number of vehicle movements by 296.2 to 1,359.4 per day.

The estimated AM peak will be 138.7 vehicle movements with 26.5 (19%) exiting the site and 9.7 (7%) entering the site between 08:00 and 09:00 hrs. The estimated PM peak will be between 15:00 and 16:00, with 159.2 vehicle movements. 19.3 (12%) entering the site and 12.9 (8%) exiting the site during this period. The estimated greatest number of vehicle movements entering the site will be 23.5 (22%) between 17:00 and 18:00 hrs.

The estimated proportion of vehicle movements entering the site will increase from 2% at present to 12% once occupied and the proportion exiting will increase from 2% to 13%.

* 1. Site Estimate

The TA includes TRICS summary data for the Care Home, AM Peak (08:00 – 09:00), PM Peak (17:00 – 18:00) and Daily Trip Rate. As stated, without the breakdown by hour it is not possible to build a full model for the site. As noted above, the observed PM Peak for the site is between 15:00 and 16:00 hrs.

Therefor the model below is only based on data for 08:00 – 09:00, 17:00 – 18:00 and the Daily Trip Rate.

|  |
| --- |
| Estimated vehicle movements (Observed plus TRICS estimate) |
| Time | Total Movements | Entering | Exiting |
| 0800-0900 | 143.8 | 12.6 | 28.6 |
| 1700-1800 | 112.0 | 25.3 | 15.2 |
| Daily Trip Rate | 1,476.4 | 203.1 | 210.2 |
| Average |  | 14% | 14% |

The table above shows that the estimated Daily Trip Rate (including residential and care home) once the site is occupied will increase from 1,063.2 to 1,476.4, an increase of 413.2 (39%). 203.1 movements will enter the site (14%) and a further 210.2 (14%) movements will exit the site.

1. Construction Traffic

The Framework Travel Plan submitted to support the application includes a series of measures that the developer will put in place for residents of the private homes and flats as well as the staff and residents of the Care Home as part of the full travel plan. However, the Framework Travel Plan does not address the issues associated with construction traffic.

* 1. Waste removal

As a brown field site, the development will require a considerable amount of waste removal prior to the site being developed. The developer will have a detailed understanding of the volume of waste to be removed from the site and a schedule of when waste will be removed.

* 1. Site Deliveries

Deliveries to the site during the construction phase will also require careful planning and scheduling. The size of vehicles used for both waste removal and delivery of materials will undoubtedly impact the village of Tisbury and surrounding villages particularly on single track roads. Vehicle routes are likely to access from the A30 to the South, A303 to the North or A350 to the West, all of which will involve passing through small villages in the surrounding area.

* 1. Building and Contractors

In addition to waste removal and material deliveries, the site will also require a considerable number of builders and contractors throughout the construction phase. Given the scale of the development, this is likely to account for tens of vehicles accessing the site for a prolonged period during the construction phase.

It is expected that a detailed Construction Travel Plan will also be produced to enable the developer to minimise the impact on the local road network. This is likely to include detailed scheduling of waste removal and material deliveries to avoid peak periods as well as mitigations to limit the number of builder and contractor vehicles accessing the site.

1. Further Observations

The site is in a rural area at the edge of the village, as such it should be noted that the vehicle movements on Jobbers Lane are seasonal in nature. During periods such as harvest time, the road is used by local farms as a route for transporting harvested crops to storage.

This can involve a series of large agricultural vehicles with trailers passing along Jobbers Lane throughout the day and night. This also occurs during planting season and when fields are fertilised. These seasonal variations should be investigated further with local farms to ensure that the development will have minimal impact during the construction phase and once occupied. This is especially important when considering the timing of junction improvements as part of the development.

The site is located close the River Nadder, as with many areas of the village the section of Jobbers Lane close to the current entrance to the site is prone to flooding. Heavy rain during October 2021 led to flooding under the railway bridge on Jobbers Lane, making the road impassable

1. Institute of Government Timeline of UK coronavirus lockdowns, March 2020 to March 2021 <https://www.instituteforgovernment.org.uk/sites/default/files/timeline-lockdown-web.pdf> [↑](#footnote-ref-1)