

Planning Application LPA Ref: PL/2021/09778

Land at Station Works, Station Road, Tisbury, Wiltshire SP3 6QU



Appeal Reference: APP/Y3940/W/22/3308919



# **Statement of Case Appendix D Report on Community Representations**

**Prepared for Tisbury Parish Council**

*Final version – 15<sup>th</sup> December, 2022*

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# 1. Context

## Planning Application PL/2021/09778

- Commencing 26<sup>th</sup> October, 2021, Wiltshire Council conducted an Article 15 Planning Consultation on the above planning application, which is described by the applicant as a proposal *“to develop a mixed development of up to 86 dwellings, a care home of up to 40 bedspaces with associated medical facilities, new pedestrian and vehicular access and traffic management works, a safeguarded area for any future rail improvements, and areas of public open space”* on the site of the Station Works, Tisbury, Wiltshire, SP3 6QU.

## Representations from the community

- In addition to statutory consultees, representations were received from local parish councils, residents’ organisations, other non-statutory consultees and members of the local community.
- This report, prepared for Tisbury Parish Council, supplements Wiltshire Council’s officer report on the application, by summarising the representations received from members of the public and from non-statutory consultees.
- The report focuses on the **considerations** which led those making representations to object or support the proposed scheme. Tisbury Parish Council considers that the insights drawn from these representations can play an important role in assessing the benefits and impacts of the proposal.

# 2. Key Conclusions

## Representations from 10% of Tisbury’s community

- The importance of the proposal to the local community is reflected in the fact that **260** responses from non-statutory consultees and members of the public were received, the vast majority of whom are members of Tisbury’s community. This represents **10.2%**<sup>1</sup> of the resident adult population of the civil parishes of Tisbury and West Tisbury together and **13.6%** of the adult resident population of Tisbury’s built-up area.

## High level of engagement

- Many responses had clearly taken time to prepare and a number had been written with the benefit of relevant experience. Tisbury Parish Council would recommend in particular:
  - **Viability Assessment** - Nadder Community Land Trust
  - **Decontamination** – James Robinson
  - **Urban Design** – Andy von Bradsky and Nicholas Boys-Smith
  - **Accommodation for Older People** – Andrew Thomas, Professor James Malone-Lee
  - **Housing Requirement** – John Wiggs
  - **Transport and Air Quality** – Clyde Whittaker
  - **Healthcare Provision** – Dr. Adam Smith

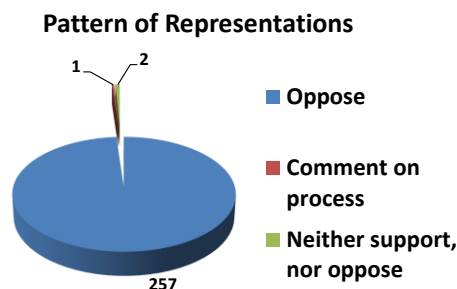
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<sup>1</sup> Resident Adult Population calculated from 2011 Census Table KS102EW, uplifted by 6.3% representing the percentage increase between 2011 and 2020 projected in the ONS Mid-2020 population estimates for Tisbury Community Area.



## Current proposal overwhelmingly rejected











- The breakdown in representations is shown opposite. 257 representations of the 260 objected, whilst two neither opposed or supported the proposal.



## Support for development remains strong

- It was noticeable that **one quarter** of those making representations included a statement stressing that whilst they strongly objected to the current proposal they were strongly in favour of the development of the Station Works site.
- Only **three** responses of the 260 received by Wiltshire Council were fundamentally opposed to development of the Station Works site.

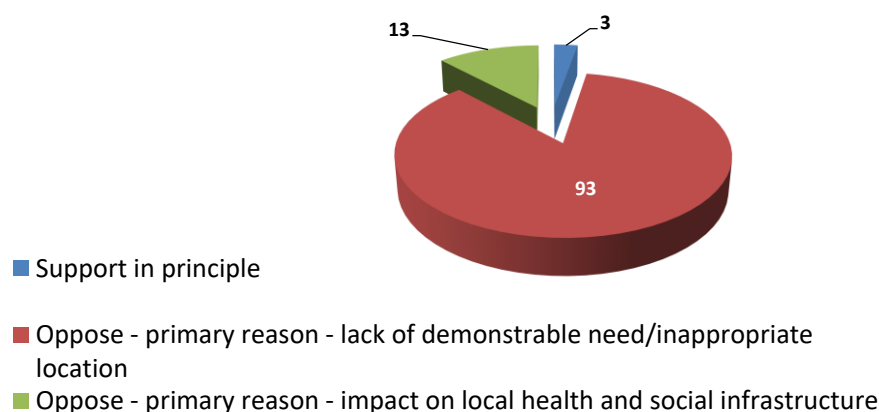
Those expressing this view cited a range of concerns, but most notably the poor quality of the proposal, lack of appropriate access, its failure to support the objectives of the Neighbourhood Plan and the absence of a genuinely mixed development.

-  *I would support the site being developed but not this ill thought out proposal*
-  *Whilst I have no objection in principle to this brownfield site being developed to provide additional housing and other facilities, the current plan ... fails properly to address many of the environmental and logistical issues inherent in the site.*
-  *The site presents a golden opportunity for an imaginative development*
-  *I support sensitively scaled, strategic & sustainable rural development to benefit the rural economy. But this application falls short.*
-  *A proposal more in keeping with the village itself would be welcomed with the emphasis on affordable houses on a fully decontaminated site with appropriate access to the village.*
-  *With more sympathy and vision nearly all features of the application could be improved.*
-  *By all means develop the site but please do it in a more intelligent and ecological manner.*
-  *The site needs to be developed and offers a really good opportunity for an imaginative approach which could enhance Tisbury. Unfortunately this proposal is neither imaginative nor will it enhance Tisbury.*
-  *Whilst the need to re-develop this site is a long standing local issue - not only is it in a parlous state, but it is a wasted local resource - I am not persuaded that this proposal is a satisfactory solution.*
-  *Tisbury deserves better. The future of this site is integral to the future vision of the village. The proposed development is disconnected from this vision detracting from the vibrant and sustainable aspirations of this community.*

## Opinions on the proposal for a Care Home

- A key element of the proposal is the provision of a care home supporting up to 40 beds on the Station Works site in place of commercial units as envisaged in the Neighbourhood Plan.
- The Care Home proposal was mentioned specifically in 42% of representations:

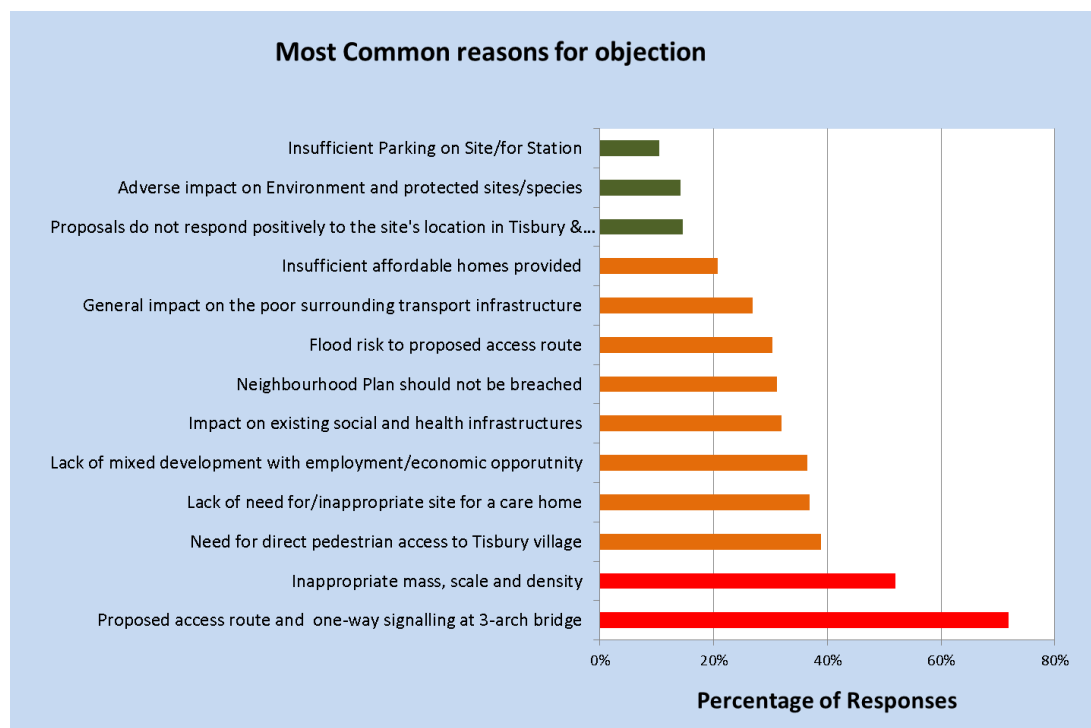
**Assessment of Care Home Proposal**



- A substantial number (37% of all representations) opposed the proposal in principle for one or more of the following reasons:
  - local care home provision was felt to be sufficient already
  - the site was felt to be inappropriate and too isolated from Tisbury village
  - the proposal would rely on bringing in both residents and carers from outside Tisbury, resulting in unacceptable levels of out-commuting
- A smaller group (4%) opposed the Care Home proposal on solely grounds of its impact on the local health infrastructure and Tisbury's GP surgery (matters which could be resolved through developer contributions).
- Three representations (1.2% of the total) gave the Care Home proposal full or qualified support.

## Consensus on the main issues

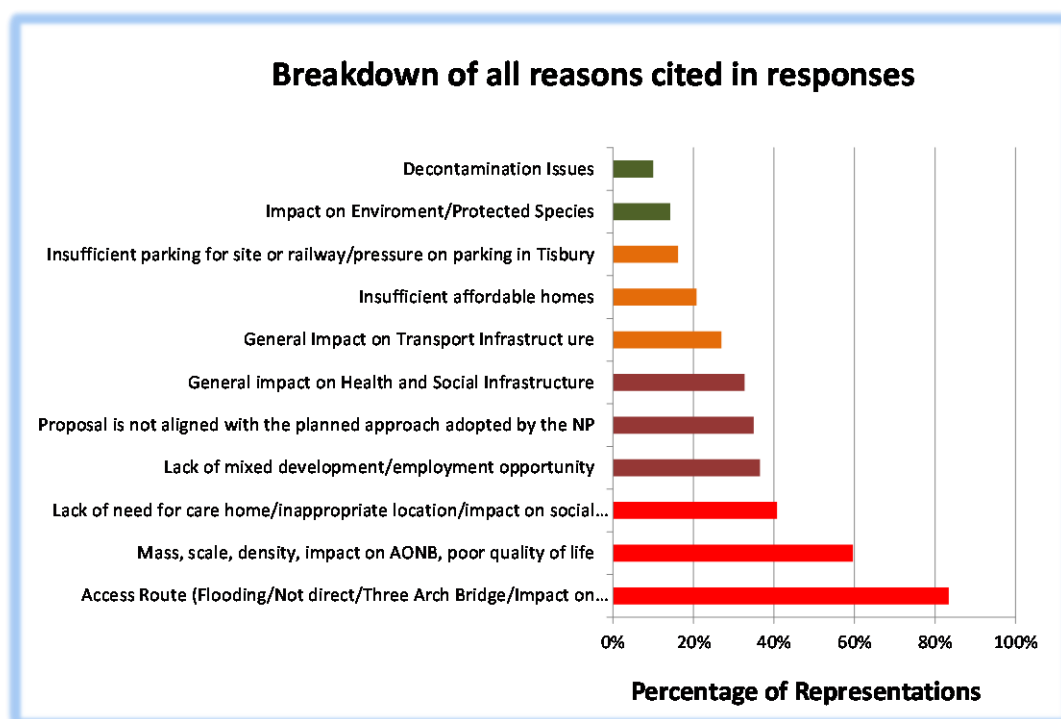
- A small number of issues were common to many of the representations made. The main concerns are shown below:



- **Access** - access was regarded as a major defect in the proposal, with 72% of those objecting citing the safety and practicality of the proposed road scheme at the Three Arch Bridge, 30% the risk of flooding to this access route and 39% citing the lack of a direct and convenient pedestrian and cycle connection to Tisbury village.
- **Mass** - the scale, mass and density of development, and the effect these had on the site's setting and the quality of life for its residents were raised by many, with 52% of representations citing over-density or unacceptable mass and others feeling the development would not positively respond to its setting in the AONB, demonstrated a poor quality of urban design, offered too little garden and public space or that homes had been massed too close to the railway, leading to unacceptable noise levels.
- **Care Home** - The absence of evidence supporting the need for a care home was challenged by many, with 37% of representations indicating opposition principally on the grounds there was no local need for a second care home in Tisbury or that the proposed site was inappropriate and 4% solely on the grounds that it would have a damaging impact on Tisbury's health and social infrastructure.
- **Mixed Development** – The perceived failure to provide for mixed development including both B1 and Residential uses, as allocated in the Neighbourhood Plan, was highlighted by 37% of representations, many of which cited the importance of the Station Works site for continued commercial and employment use.
- **Alignment with the Neighbourhood Plan** – 31% of representations made specific reference to the Neighbourhood Plan and expressed the view that the proposal did not positively plan for a development meeting the vision set out in the Plan, including the need to prepare a

“comprehensive masterplan” for the site’s sustainable development in collaboration with other stakeholders including the Parish Council and Network Rail.

- *Lack of Affordable Homes* - 21% of representations took the view that the number of affordable homes provided by the proposal (14%) was substantially deficient.
- *On-site and Railway Parking* – 10% of representations expressed the view that parking was insufficient for residents of the future development of Tisbury station. Some raising this issue pointed out that rail is more sustainable form of travel, but encouraging modal shift depends on adequate station parking. The pressure on parking in Tisbury village caused by users of the railway station was highlighted by 8%, with some linking the current pressure on parking in Tisbury village to overflow from the railway station.
- Other concerns raised related to the impact of the proposals on the environment and protected species, soil decontamination, the absence of an education contribution and a range of other issues.
- An analysis of these reasons for opposition is shown below. In total:
  - **217 (83%)** representations cited issues arising from **Access**
  - **155 (60%)** cited **Mass, Scale & Density**
  - **106 (41%)** cited the inclusion of a **Care Home**
  - **95 (37%)** cited a failure to deliver a **Mixed Development**
  - **91 (35%)** cited lack of conformity with the **Neighbourhood Plan**
  - **85 and 70 respectively, (33% and 27%)** cited pressure on **Healthcare and Transport**
  - **54 (21%)** cited lack of **Affordable Home Provision**
  - **42 (16%)** cited lack of sufficient **Parking**




- An analysis of rationale behind these concerns is given below.


### 3. Access


This section focused on the concerns presented by the **83%** of representations which highlighted the proposed access arrangements for the application site.


#### 3.1. Requirement for direct pedestrian/cycle access


- The absence of a “safe and direct” railway crossing to connect the application site with Tisbury village was raised in 39% of all representations.
- There was recognition that the cost might not be the sole responsibility of the developer and that delivery of a crossing would need sustained collaboration with Network Rail and other parties. However, those highlighting this issue considered that connection of the site to Tisbury village through a direct railway crossing at the North-eastern corner of the site is essential at the outset for the following reasons:
  - to avoid the site becoming isolated
  - to provide appropriate access for older and disabled residents
  - alternative routes involved a circuitous and lengthy journey
  - the site design is inextricably linked to access, making sustainable access essential from the outset
  - a single access route into the site, directed away from Tisbury village is inappropriate


 *A footbridge needs to be built over the railway so that the site is accessible for the residents and does not become isolated.*


 *A fence is proposed to isolate the development from the level crossing at the north end. A hole in the fence could be expected in short order.*


 *The future of this site is integral to the future vision of the village. The proposed development is disconnected from this vision detracting from the vibrant and sustainable aspirations of this community.*


 *Without a bridge over the railway, pedestrians from the proposed development will be obliged to walk a circuitous and lengthy route with their shopping.*


 *No realistic attempt has been made to assess the feasibility of such a solution, which is a major flaw in the Access proposal.*

 *It is obvious that the preferred solution is for a new bridge (or underpass), designed and built, in close consultation and co-operation with Network Rail and the Tisbury Community.*

 *Any serious application capable of approval will necessarily involve either a Bridge over the Railway or an Underpass beneath ... in either case in order to provide a convenient and safe access for pedestrians to and from the centre of Tisbury.*

 *A foot crossing of the railway line is essential in order for the residents to feel part of the village.*







 *A far better solution would be a bridge over the railway, planned to accommodate a second platform. It could double as the railway platform access and thereby release costs that Network rail will incur.*

 *I am convinced that a successful resolution of the access issue providing a means of direct passage across the railway line is key to the long-term success of this development and its integration into the rest of the village of Tisbury.*



### 3.2. Increase in vehicular traffic

- Many representations advanced the view that the “circuitous” and “difficult” pedestrian route proposed to Tisbury village would result in an increase in car-borne traffic between the development, which would be unacceptable on the following grounds:
  - It would lead to unnecessary air pollution and fail to address climate change
  - It would result in unsustainable pressure on parking within Tisbury village, where parking supply is already unable to meet demand at certain times

-  *The rest of the country is attempting to put up some sort of fight against climate change.*
-  *This will be exacerbated by the lack of pedestrian access to Tisbury High St. from the northern end of the site resulting in residents journeying to the High St by car (albeit these journeys will not be through the villages but will add to traffic volumes in the High St and Jobbers Lane by the railway station and exacerbate car parking issues that are already prevalent in Tisbury High St.).*
-  *Pedestrian access to the village would not be easy and despite the application highlighting a new footpath in reality most people going into the village to shop will probably use cars from the station site.*
-  *The distance from the centre of the Station Works site to the heart of Tisbury (measured as the Post Office) will be approximately 750m via the proposed route. In practice, this will prove too far for many residents (particularly those in a care home) wishing to access the facilities of Tisbury, leading to an undesirable increase in traffic.*
-  *The distance from the site to the high street via the bridge route would mean that residents of the new houses would drive to the shops and cause yet more parking problems.*
-  *I do not believe that the solutions suggested meet the criteria for sustainability or offer genuine choice to encourage people to use their car less.*

### 3.3. Transport Model regarded as questionable

- A number of representations threw doubt on the traffic projections set out in the Transport Assessment and particularly the impact of the light-controlled scheme proposed for the Three Arch Bridge. Criticism centred around the following arguments:
  - the Transport Assessment was based on unrealistic projects from edge-of-city locations which were well serviced by public transport, meaning that car volumes are underestimated
  - it does not match experience on the ground, based on the evidence of the temporary light controlled operation of the Three Arch Bridge on 10<sup>th</sup> November, 2021
  - it does not take into account the impact of train arrivals at Tisbury Station and the significant peaks these will generate

- it does not consider the impact which the resulting “pulses” of vehicles leaving the junction would cause
- it does not consider the modal shift towards vehicle use resulting from the absence of a “direct and convenient” pedestrian and cycle route to the site
- it does not consider the impact which even short delays at the Three Arch Bridge will have by diverting vehicles to adjoining areas, particularly Tisbury Row.
- it does not take account of future station redevelopment, providing the necessary room for growth which this will require
- the trip projection for the proposed care home does not align with the national staff to resident ratio of 1.5:1 with a shift-based working pattern

*Whatever may be said about traffic surveys (and were they taken at normal busy times?) subjectively the road under the bridge is busy. Interestingly, on 10.11.2021 there were temporary traffic lights by the Three Arch Bridge. At about 8.45am traffic was backed up and potentially an obstruction to the entrance to the station car park.*

*Earlier this month a traffic light control system was temporarily imposed at the bridge, resulting in single way working through a single arch. It was chaos. Traffic coming from Tisbury and heading towards Jobbers Lane ended up backed up towards the Nadder bridge. Because of the vehicles parked near the bend and opposite the former Southwestern pub, particularly when the queue included tractors, buses and large goods vehicles, passing was almost impossible.*

*So realistically, the modelling works for the average rural community in an ideal world but not reality.*

*Rather than relying on statistical models for generic ‘rural’ locations, more credence should be given to the existing residents who actually understand how its population use the roads. In this current proposal*

*These reference sites generally enjoy public transport levels which far exceed those of Tisbury. On investigation, one reference site at Bentley Road, Doncaster (SY-03-A-001), was found to be served by no fewer than 8 bus routes with over 12 buses per hour. ....this approach runs contrary to explicit guidance from TRICS, the database provider, who state that in site selection “the importance of compatibility in terms of local population, vehicle ownership, location type, etc. cannot be stressed enough.”*

*Severe congestion will occur when railway passengers arrive at the station and depart, en masse, in their cars from the station car park.*

*Whilst traffic is relatively light much of the time it is very busy just prior to the arrival of trains.*






*The traffic impact report notes that there is no major road access to the village but appears to ignore the effect of a significant increase in volume in the small surrounding lanes.*

*The transport impact of station redevelopment has not been taken into account, despite the requirement of the Neighbourhood Plan that this is considered in any solution.*

*A 40-bed care home with a typical patient to staff ratio of 1.5:1 on three shifts per day will produce in the region of 180 traffic movements per day, without counting visitor traffic.*




### 3.4. Balance of private and public benefit

- A number of responses expressed the view that the proposed access scheme had few if any public benefits and was being promoted solely for the convenience of the developer. Some of these comments echo those made in the Wiltshire Highways response.

-  *It is difficult to see how the application delivers significant highway improvement in the locality as stated in paragraph 6.23 of the planning statement. This must be a false statement as clearly there is no planned tangible improvement to the highway in the locality*
-  *The major drawback of the proposal is the reduction of the Three Arched Bridge to one lane for traffic. Access to Tisbury from the south is already extremely poor and it is unacceptable that it should be reduced in this manner for the convenience of the developers*
-  *The most objectionable part of the plan is however the wholly impractical proposal to close one of the road arches under the railway line. With both arches open this is already a pinch point at certain times, and regularly gets flooded when there is heavy rain. With one arch only and the proposed traffic light scheme, there would be routine traffic jams and long tailbacks. Frankly one has to question the overall credibility of developers who think such a scheme is a practicable solution.*
-  *The only reason to propose closure of the road arch would appear to be to save the applicant money, at great inconvenience to everyone else.*
-  *it is against logic and natural justice to close one arch of the railway bridge to traffic to provide pedestrian access that few will use just so that this development can take place, benefiting a very few to the detriment of the many;*

### 3.5. Highway Safety - approaches to the Three Arch Bridge

- A number of representations expressed concern that the highway width on the approach to the Three Arch Bridge, particularly on the Northern side is insufficient to cope with even short queues of vehicles created by the scheme. Those raising this point considered that the effect would lead to an unacceptable risk to highway safety.
- On the Southern side the additional impact of vehicles queuing to leave the application site was questioned.

-  *Changing the access in and out via the bridge to a single arch, traffic light controlled system will send pulses of vehicle nose to tail along Jobbers lane, where they will meet vehicle coming the other way which will cause all sorts of congestion within the single file sectors.*
-  *It is not clear on the design how far the new pedestrian footpath/cycleway would extend on the north side, but wherever the traffic lights were situated, more than 5 or 6 vehicles waiting to pass through the bridge from the village towards the development would create a queue extending into a single-lane section, thus blocking the passage of vehicles coming the other way.*
-  *Yes, as the report says, the fire engine will physically fit under the one remaining arch, but will be unable to get past the queueing vehicles halted by the proposed traffic lights and single file access.*

- ✎ *Even if the queuing data were correct (and this seems highly improbable), no attention has been given to the restricted carriageway width at the approach to the signalised crossing on the North-Eastern side, where vehicles will be queueing ..... the plans provided in the Transport Assessment show that the road width at this point is 6 metres wide. It clearly shows that a combination of standing Southbound traffic, emerging Northbound traffic, combined with pedestrians struggling along the narrow pavement is unsafe and will hinder emergency vehicles.*
- ✎ *Equally traffic emerging from the site and waiting to pass through the bridge into the village, would quickly get congested. There is little room between the site exit and the proposed traffic light, so once a few cars were waiting at the light, further traffic emerging from the site to turn right would be blocked.*

### 3.6. Highway Safety – vehicle repair site at the Three Arch Bridge


- A small number of representations pointed to the presence of a vehicle repair business immediately alongside the Three Arch Bridge and expressed the view that this had been ignored by the traffic modelling, resulting in safety risks.
- The vehicle repair business lies within the area controlled by the proposed two-way traffic signal scheme, but vehicles leaving the site would be uncontrolled and drivers would be unaware of the switch state of the traffic controls governing access to the controlled area. As a result, they might not know which direction of traffic flow had exclusive access to the carriageway when leaving the site.


- ✎ *Towards the arch bridge on the right hand side corner is a garage/workshop where many cars are often parked on the road - with traffic lights there this will become a danger zone.*
- ✎ *The Transport Assessment does not consider .... the impact of the whole scheme on the vehicle business currently located immediately North of the Three Arch Bridge, whose entrance lies at the centre of the controlled zone ..... the vehicle movements to and from this business will have an impact on the scheme which requires careful assessment.*


### 3.7. Highway Safety – provision for pedestrians and cyclists


- Many representations commented on the practicality of the proposed pedestrian and cycle route. Concerns were focused particularly on the proposed route North of the Three Arch Bridge, with a number of representations advancing the view that the scheme did not consider the entire route and left residents to “take their chances” once they had arrived at the Bridge. Criticism centred on the following arguments:
  - Lack of pavements and lighting along stretches of the route
  - Frequent flooding of the footpath between the Three Arch Bridge and Tisbury village
  - Insufficient footway width North of the Three Arch Bridge for those with prams, pushchairs and wheelchairs
  - The effect of queuing traffic on the safety of both pedestrians and cyclists.


- Insufficient provision for cyclists who cannot use lengths of the proposed footpath route
- The safety of cyclists simply passing under the bridge to cycle along Jobbers Lane and Station Road, without wishing to visit the application site.


 *The pedestrian access with its lack of proper pavements on parts of Jobber's lane, Station Road and the river bridge crossing is dangerous and therefore the pedestrian plan is ill thought through.*


 *The route via Stubbles is not wide enough for mothers with prams and toddlers. In the winter it is full of puddles and potholes and floods from time to time.*


 *Pedestrians trying to access Tisbury will be walking along an unlit road with increased traffic.*

 *What does the footway/cycle path actually achieve? It cannot run any further than the access ramp to the station at which point cyclists and pedestrians will need to cross Station Road. The option proposed for pedestrians is then outlined as being to use the footpath across the bridge and then past the Stubbles play area, and up the narrow lane beside the churchyard to Church St and thence to the village. Has anybody actually thought through that route? The footpath for much of its length is barely wide enough to have 2 pushchairs/prams pass each other. The length south of the river floods every time there is rain and will need not just substantive work to raise it, but also to widen it. Where it meets Church St there is a very limited sight line to the W and the footway beside Church St is barely wide enough for one person. There is no room to widen it as it is already encroached upon by tractors, buses etc. And it is a footpath, not a cycle route, with no room to segregate pedestrians and cyclists. If, on the other hand, users having crossed Station Road turn right the roadway is very narrow, without a footway until beyond the Southwestern. There is then the problem of how to negotiate the bend and bridge over the river. I am afraid I am just not convinced that the proposed solution for pedestrians and cyclists to reach the village is viable.*

 *What about wheelchair users trying to get access to the main village - the footpath running along the busy road is far too narrow for their wheelchair!*

 *Nor do I think that the costs and impacts on users of the full route between the village and the development site were considered; they only seem concerned with getting people off the site and then they can take their chances on how to get into the village thereafter. They would need to negotiate a hazardous road with intermittent pavements or a far from ideal footpath over and beside the river which is frequently subject to inundation.*

 *Bikes and people do not mix well (eg problems on the Town Path in Salisbury). On this application route bikes will have to move on to the road where they meet Footpath 74 to follow the access route proposed to Church Street, as ridden bikes are not allowed on a footpath.*

 *Whilst a cycle path would be desirable, it would in majority only serve those wishing to bike into the middle of Tisbury from the new development, an easily walkable distance. Bikes transiting Tisbury could not use the cycle path but would have to use the car route.*



### 3.8. Highway Safety - Visibility

- A number of representations commented on the poor road visibility approaching the Western arch of the Three Arch Bridge, which will become the only vehicular route, caused by the arch itself and sharp bend of the road immediately to its North.
- One representation pointed out the implications of this limited visibility at times when the traffic lights controlling the proposed scheme are temporarily out of order.



*Traffic lights break down, which would cause the prospect of crashes on a one-way system and possible injuries and thereby increased delays.*

### 3.9. Highway Safety – impact on surrounding lanes

- 27% of representations commented on the poor road infrastructure around Tisbury, many expressing concern about the impact of the access proposal on the safety of nearby lanes. The key issues were:
  - The general capacity of the country lanes surrounding Tisbury
  - The ability of the surrounding lanes to cope with overflow in the event that restrictions at the Three Arch Bridge result in delays
  - The fact that surrounding lanes are largely single-track and the impact which 'convoys' of cars created by the traffic controls will create
  - The use of some lanes, particularly Tisbury Row, by walkers and horse riders.
  - The assumption that the surrounding lanes can act as a 'backup' in the event that the primary vehicle route under the Three Arch Bridge is blocked due to flooding.



*Creating a major bottleneck at the edge of Tisbury will simply force traffic along even less suitable roads, many of which are single lane in character and can already become clogged at certain times and seasons. The traffic impact report notes that there is no major road access to the village but appears to ignore the effect of a significant increase in volume in the small surrounding lanes.*



*My main objection to this planning application is the concern I feel regarding the impact on Tisbury Row that the installation of traffic lights is going to cause. It will inevitably turn Tisbury Row into even more of a rat run than it is now with people trying to avoid hold ups at the lights. This road, like many in the surrounding villages, is basically a single track with passing places. It is used by walkers, horse riders and cyclists, and with the increase in traffic, it will make the road much more dangerous.*



*Traffic coming from the A30 to the railway station and general traffic passing through Tisbury itself, may not bother 'risking' the traffic lights but will use Tisbury Row instead which is not suitable for two way traffic . Anyone wishing to ride or walk along there, will be at additional risk of accident.*



*By being on the 'other side' of the railway line, there is a real risk of these residents not being able to even access the high street and facilities due to flooding. This would result in the use of a car and an alternative route, increasing emissions. The only access roads to Tisbury are narrow, some with little or no passing bays.*



*Tisbury is unusual in being a main hub which is approached by some six narrow country lanes, not even a B road. Jobbers Lane, the obvious route from Tisbury Station to the A30 is already the cause of some aggravation as cars meet vans, large tractors and public buses*

*The application presents this impact as minimal by averaging already questionably low traffic movements to less than one per minute and only to and from the site. That is not how it would work. It fails to take into account either the bunching into mini convoys caused by the lights or the reactions of existing traffic. Tisbury has no A or B roads and connects to the world through a web of 19th Century country lanes. They are narrow, frequently one lane with passing places. The passing places work well when single vehicles approach each other. There is an acceptance of the need to squeeze up and reverse. Convoys would create frustrations requiring shuffling to and fro especially if a convoy were to meet the school bus or a tractor with trailer longer than the passing place.*

### 3.10. Impact on AONB

- A number of representations took the view that the presence of a traffic light system on the South side of the Three Arch Bridge, would have an 'urbanising' impact which would be unnecessarily intrusive on the character of the AONB compared with alternative schemes.

*Traffic lights are an urban intrusion to Tisbury and inappropriate to its rural location.*


*I would suggest traffic lights are totally inappropriate for the area and do not respect the rural character of the village.*


*Traffic lights as proposed are totally inappropriate for the area the village and the AONB and do not respect the rural character of the location*


*They are also an unnecessary urbanisation of a rural village.*


### 3.11. Safety Risk - Flooding


- 30% of representations highlighted the history of flooding to the road under the Three Arch Bridge and across much of the proposed pedestrian route between the proposed site and Tisbury village. A number of representations included pictures of recent flooding which occurred on 21<sup>st</sup> October, 2021. Those raising concerns pointed to this instance of flooding and felt that the scheme involved too high a level of risk for one or more of the following reasons:
  - it did not offer a safe pedestrian/cycle route to Tisbury at times of flooding
  - it did not model the effect of the proposed closure of one arch of the Three Bridge on flood levels, given that both bridge arches currently form an overflow channel at times of flood
  - the smaller dimensions and lower elevation of the Western arch of the Three Arch Bridge (through which vehicles would be channelled) would create greater difficulty for emergency vehicles
  - the impact on residents of the development and particularly the proposed Care Home


 *The existing access to the site floods, as evidenced on October 21st, 2021, when the height of the river rose to half a meter above its previously record high, therefore, the facts stated in the planning documents are wrong. 90.62m is not the highest recorded but presumably this should now be over 91m. This shows that access to the site is not feasible or sustainable for a new development of this size.*

 *The assessment of the flood risk and the statements relating thereto are misleading. The access to the site is clearly in a flood zone and there is a severe risk of flooding meaning access into the site would be impossible in times of flood therefore is not a suitable location for a care home.*

 *Recent floods in Tisbury have highlighted how vulnerable this area is to flooding by the River Nadder and the navigation of this particular area by means of traffic lights for vehicles with the other side under the bridge being used for pedestrian access seems ill thought out and dangerous.*

 *On a personal note, about 20 years ago we lost the diesel engine of a Peugeot 405 due to flood water ingestion when going through the proposed traffic arch of the bridge. The problem of flooding here is real and becoming increasingly more frequent and expensive. Please seek to minimise the extent of the proposal to mitigate the serious chances of poor outcomes for Tisbury.*

 *The Planning Statement refers to pedestrian access to the village via the Stubbles. It does not take account of the flooding that occurs readily to the Stubbles path which makes pedestrian access impossible at times. This autumn the flooding has been severe both here and further along the road by the South Western.*

 *The bridge is notorious for flooding and, in the last couple of weeks, we had torrential rain for a couple of hours and the Fire Brigade had to be called to tow out cars which had become stuck in the flood water.*

- A sample of pictures submitted by those making representations are reproduced below:



### 3.12. Impact on Resilience


- One representation pointed out that the proposed scheme would weaken the resilience of the local transport system by removing the limited degree of redundancy provided by the existing bridge configuration.





*Becoming reliant on a single arch for vehicles introduces a significant single-point of failure for traffic management at the Three Arch Bridge that goes well beyond flooding. The current two arch arrangement gives a measure of redundancy in the event of one arch being closed to traffic; this will be lost under the proposed arrangements*


### 3.13. Impact on Footpath FP16

- Some representations pointed to the presence of footpath FP16 and the footpath level crossing at the North-Eastern corner of the site, the proposal's plan to fence this from the development site and the indication given by the applicant that development would lead Network Rail to close the crossing, with the impact this might have.

 *Proposals to prevent access to the existing pedestrian public right of way across the railway line, by building a fence across the eastern end of the Station Works site, are just unrealistic, completely ignoring the basics of human behaviour. Given the alternative of walking the entire length of the site or cutting a hole in the fence to create a short-cut to the centre of the village, it is obvious that the short-cut will become the preferred option – regardless of the ever-present dangers associated with such a route.*

 *It is also unfortunate that the developers propose blocking off access to the footpath TISB16 at the Eastern end of the site. This turns the site into a dead end, depriving residents of access to the footpaths and open fields overlooking Tisbury with walking access to Tisbury Row.*


 *Failure to provide a convenient pedestrian access over the railway at the North-eastern corner of the site has led to the decision to seal off the site along its entire border with the railway and prohibit access to the Chantry Footpath. This is made clear in both the Planning Statement and the Statement of Community Involvement, Appendix [A]. To prevent residents finding a way over or under the site's boundary fence to access the Chantry Footpath the only realistic solution was to seek the closure of this footpath and the Statement of Community Involvement records this objective.*


 *Loss of this important right of way conflicts with Neighbourhood Plan Policy TR.4 which states support for “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.”*




### 3.14. Impact on Care Home residents

- A number of representations expressed the view that the proposed access scheme was fundamentally unsuited to the use of the proposal site for a care home, for the following reasons:
- Segregation of residents arising from the length of walking/wheelchair route to Tisbury village
  - Safety of the proposed route
  - Access by emergency vehicles at times of flooding

 *This is putting people's lives at risk especially residents of a care home who historically require emergency services regularly.*

 *The plan completely fails to take into the account the needs of the care home residents who are unlikely to access pedestrian or cycle routes and as a result may be isolated from the village that they need to be part of.*

 *If you cannot include access from an estate into the community hub, which is safe and feels safe (footbridge), then abandon the project because otherwise you risk a social nightmare for some. It is not acceptable because there is plenty of literature warning urban designers about these risks*

## 4. Mass, Scale and Density

This section focuses on the 60% of representations which cited the mass, scale and density of the proposal or their impacts on the proposal site's setting and the AONB.

### 4.1. Planned vs unplanned growth

- A number of representations expressed the view that the proposed scheme significantly exceeds the housing numbers planned by the Core Strategy and Neighbourhood Plan and in doing so undermines the planned growth on which both plans are based. The points made by those advancing this view centred on the following observations:
  - in recent years Tisbury has grown by 90 homes following the Wyndham development
  - it will exceed the indicative housing requirement set by the Wiltshire Core Strategy
  - following recent development some local services are running at near capacity
  - the Core Strategy and Neighbourhood Plan adopted policies of modest, growth, matching employment and housing, based on a view of what would be sustainable.
  - the quantum of housing proposed undermines this planned approach

*The proposed development is at odds with the Tisbury Neighbourhood Plan, which identifies that the estimated development potential of the Station Works is sixty new dwellings albeit alongside new commercial business units....the Wiltshire Core Strategy 2015 and the recent Consultation Paper 'Empowering Rural Communities', have also limited the number of new dwellings required in Tisbury to a sustainable level; the application is also inconsistent with these Plans.*

*The proposal would not support local services and communities but would put undue strain on them.*

*In development of the Tisbury and West Tisbury Neighbourhood Plan, the maximum capacity of the site was identified as greater than 80 residences. However, after consultation and consideration, the final Plan stated 'the estimated capacity of the site is 60 dwellings in two storey buildings plus commercial uses, but density overall must be appropriate...' This was a conscious decision based on the desire for mixed use and allowing for adequate public amenity space. The decision was endorsed by Wiltshire Council in their adoption of the Plan. Housing type and density. Both the proposals include high density housing. Tisbury has already met its housing target as laid out in the local development plan. What Tisbury does need is affordable housing, for local people, and this has been reduced in the revised proposal.*

*The scale of the proposed development is not in line with the Wiltshire Council Local Plan 2021 (Empowering Local Communities) which provided for 65 dwellings by 2036 i.e equivalent to 4 a year. The housing density vastly exceeds this. Instead of the envisaged gradual growth in housing Tisbury Doctor's surgery will not be able to accommodate the needs of what would amount to an immediate increase of 15%/20% to the population of Tisbury.*

*I also note that the figure of 60 is said by IL not to be based on a precise calculation of what could be built on the site. It is however not a figure plucked out of the air and I would contend that it is a suitable starting point for the development proposal.*

*The number of dwellings proposed is wholly inappropriate and certainly does not constitute "modest growth . . . to ensure development is balanced . . ." as set out in Wiltshire Core Strategy 2015*

## 4.2. Scale and Mass

- Many representations linked the increased housing number to an inappropriate density which in the view of those responding resulted in a scale and mass which failed to respond to the site's setting, Tisbury's community and the AONB.






- I object to this application for several reasons. It provides an urban solution to a rural AONB. The poor design and over development of the site exacerbates the problem.*
- The densely packed housing would risk becoming an isolated enclave.*
- A development of eighty-six, as opposed to sixty, dwellings will also have a greater visual impact on the Tisbury Conservation Area and the AONB. The Heritage Statement, the Landscape & Visual Impact Assessment and the Design & Access Statement touch on this issue but the claim made in the Planning Statement<sup>4</sup> that 'The indicative layout has been carefully designed to safeguard important views out from the village, including views to and from listed buildings.' is tenuous.*
- The proposed scheme has a substantial 3 storey content, on a site where the TNP calls for development of predominantly "two storey".*
- The artist impressions are understandably light on detail at this stage, but the building massing and orientation is more suited to town edge development rather than village development required in the TNP.*
- As highlighted in Salisbury District Council's Conservation Area appraisal for Tisbury 2009 ...' future expansion of the village will lead to an increasing emphasis on trying to retain its intimate and relatively modest village character. Modesty and intimacy are considered to be key characteristics and form a positive part of the village in the context of its conservation area status.' The size and scale of this proposed development is not in line with the Tisbury Neighbourhood Plan and could not be described as modest or in keeping with Tisbury's village character.*
- In an area of ANOB the height of the buildings is totally inappropriate on such an elevated site. They will clearly be visible from the main village.*

## 4.3. Space and Quality of Life

- Other representations considered that the high density made it impossible to address the site's specific challenges and would result in limited outdoor space and a poor quality of life. Comments centred on:







- Small size of gardens
- Sense of urbanisation and overcrowding compared with Tisbury village
- Houses too close to the railway with resulting problems of noise and pollution

- The gardens are minuscule and inappropriate for families with small children.*
- According to the leaflet circulated, the proposal would provide, "generous private gardens". At 18.3 homes per acre, I don't see how the word "generous" applies. This is more akin to an urban development than a rural one.*

-  *The plot size crams in far too many houses to give residents a feeling of the character of the area into which they are moving. It would be an overcrowded estate with pocket-handkerchief gardens and neighbours too close for desired privacy.*
-  *The proposed density of housing, even at the reduced level, is totally inappropriate for the site, given the known ground contamination levels, the noise and fume contamination from the proximity to the railway, and the extremely restricted access to the site, both for vehicles and pedestrians.*
-  *The current plan is altogether too large and fails properly to address many of the environmental and logistical issues inherent in the site.*
-  *This is a planning application for overcrowded housing with little open space.*
-  *The density of housing/care home spaces is still too great and must be reduced further, giving greater opportunity for open space/amenity land for the residents and public.*

#### 4.4. Sustainable Design

- A number of representations were concerned that the design details provided were insufficient to create confidence that the site could be well designed, given the significance of the density issue. The chief concerns expressed were:
  - Lack of place-making
  - Failure to respond to the site's shape and in particular the reliance on a long spine road
  - Dominance of car parking

-  *There is insufficient evidence of any attempt at place making or alignment to a wider development strategy.*
-  *The masterplan does not reflect the character of the existing context and townscape, nor give confidence that the proposals will lead to a good quality environment.*
-  *There is insufficient details on built form, architectural approach, identity, use of materials and detailing to give confidence that the proposal will be distinctive and add character to the existing settlement. It is essential that this is provided at this stage so that a reasonable judgement on the acceptability of development and alignment with the Neighbourhood Plan objectives can be made by the community.*
-  *The layout is a series of fragmented blocks along the full length of the spine road, arranged to satisfy housing mix and parking requirements and is dominated by car parking, resulting in a poor sense of place that is not characteristic of the historical built form and character of the area.*
-  *It is overdeveloped, cramped, unpleasantly designed as a long street.... and visible from much of the village - it will look very ugly and inappropriate to the area.*
-  *The design, scale, and access plans jointly create the conditions for an isolated development where residents struggle to integrate and access with the existing village. There is no hint at future proofing the development, likely lumbering residents with buildings that they will be forced to retrofit later at their own expense.*

*The artist impressions are understandably light on detail at this stage, but the building massing and orientation is more suited to town edge development rather than village development required in the TNP. The development style at the north end of Tisbury on Grosvenor Drive and Morrison Avenue is better suited to the village environment.*

#### 4.5. Impact on Dark Skies Reserve

- Ten representations pointed to the impact on light pollution and the AONB's status as a an international Dark Skies reserve as a consequence of the development's density, built form and elevated location.

*The Lighting survey is focused on how the proposed development can comply with health and safety requirements. It does not assess the impact of lighting on this dark skies area of the local ANOB.*

*Such a large and densely populated development and the associated reworking of the access to the site will involve major changes including increased lighting, road furniture and markings which are not in keeping ( or encouraged) in an AONB and a Dark Sky Reserve.*

*The lighting report seems fundamentally flawed – it is based on Lighting Environmental Zone 2, whereas in an AONB it should be Zone 1, and in a Dark Sky Reserve an argument can be made for Zone 0.*

*The large size of the proposed development, including the associated increases in housing, traffic levels and light pollution, is inappropriate for both Tisbury and an Area of Outstanding Natural Beauty.*

## 5. Care Home






This section deals with the 41% of representations which cited the inclusion of a Care Home as a reason for refusal. The representations made centred on the following arguments

- the site's physical isolation makes it an inappropriate location for a care home
- lack of evidence on need/benefit
- the narrow employment offer would draw in workers, leading to out-commuting
- questionable viability
- the greater priority of extra care and sheltered housing, given their ability to offer older people a greater degree of independence in later life
- the significant impact on local healthcare provision








### 5.1. Suitability of the site

- The proposal site's isolation, poor access, lack of space, proximity to the railway and lack of recreation space or facilities were considered to make it a highly inappropriate location for a care home in planning terms.

-  *The site seems inappropriate for a 40 bed care home. There is inadequate parking provision and I feel isolation for patients/residents would be a real issue.*
-  *I am concerned about the cavalier approach to proposing a care home for the elderly without a serious discussion of the implications of the built environment for the elderly and disabled. There is not a thoughtful analysis of the service infrastructure that would be required, the personal support needs that would have to be in place. I also believe that the proposed means of access make for a textbook case of how careless planning has sentenced the elderly and infirm to lives of unnecessary isolation. All the work conducted on the urban environment that be sensitive to an aging population emphasises the dangers of isolation, particularly that resulting from poor external environmental design*
-  *The station works site would only be appropriate for those able to live independently given the difficulties and barriers to enable easy access to the village centre. Living in a care home at this location may only add to a sense of isolation from the community.*
-  *The building of a care home on this site would not serve its residents well, leaving them in an isolated place and with very little in the way of an outside environment*
-  *This is too far out of the town and very isolated In short, the care home would condemn its residents, who by virtue of their very nature would be vulnerable, to isolation and exclusion from village activities.*







### 5.2. Evidence of local need/benefit

- A majority of representations mentioning the Care Home proposal considered that insufficient evidence had been offered to support the need for a new care home in Tisbury. A number pointed to the existing care home and the views of the local GP practice.

-  *There is already an excellent care home in Tisbury*
-  *I don't believe there is demand for a new care home in the village. . I work at Tisbury Surgery*
-  *There is already a 20 bed care home in Tisbury which fulfils the requirement for residential care locally and provides employment for local people. The proposed care home would mean bringing in residents, carers and visitors from outside the village,*
-  *I am unaware of any business case that has been made for a care home in Tisbury.*
-  *Moreover there is already a care home in Tisbury serving local needs that would be adversely affected by a new rival very close by.*


### 5.3. Employment offer and out-commuting

- A number of representations remarked on the narrow employment offer provided by a care home, poor rates of pay and the resulting need to bring key workers into the area, leading to out commuting.

-  *Given the shortage of care home workers, it is likely these will need to come from a wide catchment area and travel to Tisbury, increasing road traffic through villages i.e. 'out commuting'.*
-  *Any jobs generated by such a care home would be of the minimum-wage and shift work variety and would probably attract people from elsewhere in the area, causing even more traffic congestion.*
-  *There is a real shortage of carers, especially in this area. Carers will need to be found from outside the area and a lot will be needed for a large care home of 40 people. Potentially 120 staff. Where are they going to live? In the new houses I would guess! If they can afford them of course. Which means more houses are essentially being built for a huge new employer. It will not ease any housing issues in Tisbury. It will make them worse.*
-  *The suggested employment numbers suggested reflect predominantly low paid and part time roles that will not equal in contribution to the community's economic strength as the employment opportunities in the TNP's intended commercial usage of the site.*
-  *The proposal of a care home minimises the diversity of work opportunities that could be offered in the area, especially as 2 care homes are already in use in the area.*
-  *The proposal to include a care home in the scheme is presented by the developer as bringing with it employment opportunities. But this is no substitute for small business, commercial or workplace units.*

### 5.4. Viability

- One representation questioned the viability of a care home in these circumstances.

-  *The 30-40 unit care home is demonstrably unviable, based on experience of care home or extra care providers.*

### 5.5. Preference for Extra Care and Sheltered Housing

- A number of representations emphasised that greater priority should be given to the provision of sheltered housing, extra-care accommodation and 'last homes', given the current drive to offer older people forms of accommodation which maximise their sense of independence in later life.

*The call for provision for older people in other sections of the TNP does not imply the need for solely a care home, and Nadder Close reflects the other approaches, ie independent living accommodation. Sheltered housing would also help meet provision for older people.*

*The care home is ill-considered; it is not appropriate provision for elderly residents wishing simply to downsize; and it is not supported by the local NHS service.*

*The Wiltshire Core Strategy – 2015 Tisbury Area Strategy makes specific reference to the importance of maintaining suitable housing for older people. "The provision, in suitable locations, of new housing to meet the specific needs of vulnerable and older people will be required. Wherever practicable, accommodation should seek to deliver and promote independent living."*

### 5.6. Impact on local healthcare services

- The impact of second Tisbury care home on local GP and healthcare services was highlighted in many representations, with a number referring to the views of local healthcare professionals.

*I also have considerable concerns about the necessity for a care home of this size. Such an enterprise would put tremendous additional strain on an already extremely pressurised G.P. practice. Tisbury surgery currently has over 4100 patients and this care home, together with the residents in the proposed number of new homes could add almost 10% to the practice list – and patients in a care home demand significantly more medical intervention. A vague promise to include a 'limited medical facility' as outlined in the developer's application is meaningless*

*A new 40-bed care home will mean at least one full GP day per week will be needed to provide care for that many elderly patients. The level of care for current patients will be dramatically affected.*


*NHS BSW CCG have found more recently further increasing pressure from developments that are situated in and around Tisbury which share surgeries and patients across geographical patches, counties and healthcare boundaries. This is putting further pressure on all healthcare premises, service capacity including the planning and sourcing of GP resources and provision within their own regions*

*The GP surgery could not cope with the amount of patient hours a residential home for the elderly would generate.*


*The infrastructure associated with health care provision for the proposed care home and an additional 86 properties, will not be met by an already over-stretched Tisbury surgery.*

### 5.7. Some qualified support

- The three representations supporting the principle of a care home argued that it would offer job opportunities and support the older generation, but in each case indicated that further work was necessary:

 *The idea of housing and business opportunity on this site is certainly a good one and, as it is set out in the village's Local Plan, clearly desired. The developers have interpreted this brief by including a care home amongst their private housing. This is a good and hopefully a generous idea as it gives the project potential for meaningful place making and the inclusion of an older generation.*

*The urban design presented, however, misses both the opportunities of the site and its proposed programs or uses. The care home, rather than being central to the scheme, is banished to the corner of the site. The requisite public open space, rather than being integrated into the plan, is simply placed in the centre of an elongated cull de sac surrounded by car parking..*

 *The Care Home will provide job opportunities, which is good. Doubtful though whether there are sufficient parking places both for all the staff and visitors. It is important at a care home that there is sufficient garden space for the residents*

 *Yes, perhaps to a small care home appropriate to the size of the village.*

## 6. Development Mix

This section focuses on the 37% representations which cited the perceived failure to provide for mixed development in line with the Neighbourhood Plan as a reason for refusal. The representations made centred on the following arguments:

- the definition of “mixed development”
- the greater sustainability of the mix of residential and B1 commercial development set in the Neighbourhood Plan

### 6.1. Definition of Mixed Development

- Representations advanced the view that the combination of a care home and dwellings would not meet the description of “mixed development” as commonly understood or contemplated by the Neighbourhood Plan.

*Residential care homes are Use Class C2, not B or E under the relevant Regulations. The claim that the proposed Care Home represents commercial use and that the development therefore complies with the aspiration of the Tisbury Neighbourhood Plan to develop a mixed-use solution for the Station Works is tenuous at best.*

*The proposal to include a care home in the scheme is no substitute for small business, commercial or workplace units. In essence, a care home is merely another form of residential accommodation.*

*It does not provide a mixed development - a care home does not cover the need for more local employment.*

*The proposal to include a care home in the scheme is no substitute for small business, commercial or workplace units. In essence, a care home is merely another form of residential accommodation.*

*The provision of a care home is essentially residential and does not comply with the stated policy aim of commercial units and parking.*


*The argument that the provision of a care home is mixed use and is called for in the [Neighbourhood Plan] is contrary to the spirit of the plan and disingenuous in its interpretation of the proposed fit to the criteria set out in the TNP.*


*A care home is a business but not as envisaged in the Neighbourhood Plan. It is really just adding more accommodation. Instead, a balanced development of fewer houses and small workshops, some atelier units and offices encouraging professional and future facing technologies could turn Station Works into a thriving addition to Tisbury. The application fails to have any vision, is unbalanced, too big and is incompatible with the Neighbourhood Plan.*





## 6.2. Preference for Commercial Uses at Station Works


- The same representations argued that the allocation of the Station Works site for mixed commercial and residential development, as described in the Neighbourhood Plan, represented the only sustainable future for the site. The arguments centred on three perceived benefits in the Neighbourhood Plan's allocation:
- diverse employment offer
  - greater potential to offer local employment
  - potential for future growth


 *It is currently a waste of a brown field site which could be used for appropriate housing and commercial development suitable for the needs of Tisbury as detailed in the Tisbury Neighbourhood Plan.*


 *The proposal is not in keeping with the Tisbury Neighbourhood Plan of 2019 or with the Wiltshire Core Strategy of 2015. Both clearly uphold the need to allow "...modest growth of both housing and employment to ensure development is balanced, thus helping minimise out - commuting and also provide support for local services and communities." • The proposal would not support local services and communities but would put undue strain on them. •*

 *The development of small rentable business units could provide opportunities for local start up trades to develop here and be mutually supportive at a location which would be safe and easily monitored. A mixed use, comprehensive development of the Station Works site has the potential to make a significant contribution to meeting local housing and business needs. By providing accommodation to meet modern business needs, Station Works could achieve a greater density of employment, even if there were to be a net loss in the area of commercial land on the site.*

 *It is vital that there is a provision of small and diverse mixed-use business / industrial units (as we have in the recently built Wyndham Place housing development by Fry's) which enable small rural businesses to flourish and create local employment requiring a wide range of skills-sets.*

 *I would like to see the additional of live work units to the planning application as this would bring creative people to the area and I think would really be a big benefit to both Tisbury and the surrounding areas. Personally I think that this would be a bigger benefit than the suggested care home as it will have a bigger impact on the community.*

 *TisPlan's Vision is for Station Works to deliver on its potential for a well-designed, mixed-use site providing both local employment opportunities, as well as some dwellings, with a focus on the community's needs for affordable housing,*

 *By taking away the industrial/commercial area then this is, in effect, saying that Tisbury will no longer have the capability to expand in terms of business development and therefore becomes static for all and growth ceased.*

### 6.3. Evidence of demand for commercial space

- A number of responses advanced the view that there is demonstrable demand for small commercial and live-work units, of the type contemplated by the Neighbourhood Plan.

- ✎ *There is a clear and significant demand for some small business, commercial or workplace units as envisaged in the Neighbourhood Development Plan. Provision of small business units would be healthy for Tisbury, confirming its status as an important local economic hub, and, if carefully planned, not a high generator of traffic. An example of this type of novel enterprise is the electric bike shop recently opened on Wyndham Estate, but all sorts of new local business ideas are emerging in these changing times including clothes rental, specialist cake makers, coffee and tea importers, crafters etc.*
- ✎ *There is a clear and significant demand for small business, commercial or workplace units, envisaged for this site in the Tisbury Neighbourhood Plan. Provision of small business units would be healthy for Tisbury, confirming its status as an important local economic hub and providing a counter to out-commuting. If carefully planned and sensitively managed (the Wyndham Estate in Tisbury is an example), need not be a high generator of traffic*
- ✎ *I am quite certain that there is still a further need for high quality industrial and work space in Tisbury and, as the owner of the Old Dairy, I am quite often approached about available space. I fully use the Old Dairy and so I am not able to help. but I am quite certain that there are people who are looking in the area and who would enthusiastically take up any newly provided work space in Tisbury.*

### 6.4. Criticism of the Care Home employment offer

- Conversely many responses questioned the security and benefit of an employment offer centred on the provision of a care home, as envisaged by the proposal, which was seen to be narrow, inflexible and unlikely to deliver significant economic benefits to the local economy. A number of representations questioned whether the employment provided by the care home would match the existing employment provided at the site.

- ✎ *The suggested employment numbers suggested reflect predominantly low paid and part time roles that will not equal in contribution to the community's economic strength as the employment opportunities in the TNP's intended commercial usage of the site.*
- ✎ *The proposal of a care home minimises the diversity of work opportunities that could be offered in the area, especially as 2 care homes are already in use in the area.*
- ✎ *I am very aware that care home staff are incredibly difficult to recruit – as can be evidenced by the residential home we already have in Tisbury and I believe the number of jobs lost by development of the site would far exceed those that might possibly be gained.*
- ✎ *The proposal of a 3rd care Home at the expense of existing light industrial units and jobs minimise the diversity of work opportunities for local people.*

- The benefits of a more diverse commercial employment offer, as envisaged by the Neighbourhood Plan were contrasted with the narrow employment base supported by the proposed care home, which was seen to the limit the business and economic potential of the site. It was felt that failure of the care home would lead to the permanent loss of the site for employment use.
- Ten representations pointed to the impact on light pollution and the AONB's status as a an international Dark Skies reserve as a consequence of the development's density, built form and elevated location.

## 7. The Neighbourhood Plan

This section deals with the 35% of representations expressed the view that the proposal did not positively plan for a development meeting the vision set out in the Neighbourhood Plan. Concern about lack of respect for the Neighbourhood Plan centred on these arguments:

- the proposal represents a 'major shift' from the Neighbourhood Plan
- the effort and community support represented by the Plan has been ignored
- the comprehensive masterplan envisaged by the Plan is missing, engagement with key stakeholders cursory and insufficient to overcome the site's problems
- any fundamental changes to the Plan should be developed with the Parish Council and not made through individual planning applications

### 7.1. Conflicts with the Neighbourhood Plan

- A large number of representations took the view that there was a fundamental conflict between the proposal and the Plan, which would have been well understood by the applicant.

- ✎ *Clearly, this is a major shift from the well-researched and considered Neighbourhood Plans for Tisbury up until 2036*
- ✎ *The Planning Statement effectively dismisses the Neighbourhood Plan in a single paragraph.*
- ✎ *However, the proposal itself does not meet the aspirations articulated in the Tisbury Neighbourhood Plan as adopted and endorsed by Wiltshire Council.*
- ✎ *I object to the proposal because it is in clear breach of the Neighbourhood Plan*
- ✎ *The neighbourhood plan should be regarded as a definitive document, not merely a starting point for discussion*
- ✎ *The Applicants for this development of The Station Works site have disregarded the Neighbourhood Plan all its key features.*
- ✎ *Tisbury Neighbourhood 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 would have been taken into consideration in the price paid.*

## 7.2. Value of the Neighbourhood Plan

- Some representations pointed to the research and community effort which had gone into preparation of the Plan, which they felt gave it authority.

*The Tisbury Neighbourhood Plan was a significantly well-thought through piece of work and reflected the requirements of Wiltshire Council and a real understanding of the village and how it supports both its residents and the wider population catchment which use its amenities – particularly those coming to the village for schools, shopping and medical care.*

## 7.3. Absence of a “Comprehensive Masterplan”

- A number of representations expressed concern that the site’s acknowledged infrastructure problems and its significance to the local community had been ignored because collaboration had not taken place between the developer, Parish Councils and Network Rail to develop the form of “comprehensive masterplan” proposed by the Neighbourhood Plan.

*We believe a Design Code which includes a masterplan and clear, explicit and objective design parameters for the detail design is required at this stage in order to ensure the quality of development in this sensitive context.*

*At the present time, there is no Masterplan and proposals do not meet the brief in TisPlan Policy BL.7*

*There has been no local consultation on a “Masterplan”. The parish councils have been informed, but not consulted.*



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

*The developers need to work with Network Rail to provide a pedestrian tunnel under the railway in order to provide improved and shorter access between the development and the village.*

*Had the applicant chosen to follow the process set out in the Neighbourhood Plan, the site constraints could have been overcome and the resulting proposal would have been informed by the insights and wishes of the Parish Council and the community.*









## 7.4. Adapting the Neighbourhood Plan

- There was an acknowledgement from some that the site’s difficulties might in time require fresh thinking and potentially modification of the Plan. However, it was argued that any modifications to the Plan should be made by collaboration with the parish councils, rather than implemented through individual planning decisions.

-  *If the practical realities of arranging decent access, which must surely involve some sort of bridge across the railway, and of reducing the density of build are truly insurmountable, then both the Parish and County Councils should reconsider the policy for the site within the Neighbourhood Plan.*
-  *Perhaps these problems will encourage the developer to work with the 2 Parish Councils guardians of the Neighbourhood Plan to produce a sympathetic application. The site does need development*

## 8. Lack of Affordable Homes

This section focuses on the 21% of representations which cited the proposal to provide 14% affordable homes rather than meet the 30% policy requirement set by the Neighbourhood Plan as a reason for refusal. Many advancing this view referred to lack of affordable homes for local people. The percentage of affordable homes included in the proposal was compared with that included at the recently built Wyndham Estate and in the current proposal for redevelopment of Tisbury's Old Sports Centre site.

-  *Provision of affordable housing at 30% is the minimum acceptable – and given its locality, Tisbury could be requiring 40% affordable housing.*
-  *I believe that the developer has been highly selective in its assessment of the prices at which they will be able to sell the proposed properties in order to enable them to justify fewer affordable homes*
-  *The developers have not listened to the concerns of the community which were voiced in their consultation with us. There is a lack of affordable housing for young people on low rural incomes, nor is there mixed use of this formerly commercial site-*
-  *TisPlan's Vision is for Station Works to deliver on its potential for a well-designed, mixed-use site providing both local employment opportunities, as well as some dwellings, with a focus on the community's needs for affordable housing,*
-  *Tisbury, like almost everywhere else, is desperately in need of affordable housing, facing as it does the fact that local young people (and indeed others) often cannot afford to stay in the area.... it is vital for local needs to be met.*
-  *A combination of unaffordable housing and a care home for a town where only a tiny proportion can get up the High Street unaided, is really not what is needed.*
-  *The developer has indicated that they will only supply half the statutory requirement of affordable homes on the basis of their own viability (profitability) model which is not credible. We challenge the assumptions in this model and ask that it is independently assessed.... we believe the EUV and thus the BSV are clumsily overstated in order to avoid Affordable housing responsibilities*
-  *Delivery of as few as 12 affordable homes in an estate of 2.1 hectares fatally undermines the benefit case. It represents 14% compared with a Wiltshire Council current target of 30%, future target of 40%, actual delivery of 38% on the Wyndham Estate, Tisbury and 50% proposed for the Old Sports Centre site. Based on the rates achieved elsewhere, were the 86 homes proposed for the Station Works site to be delivered at alternative sites in Tisbury between now and 2036, between 14 and 31 extra affordable homes would be delivered*



## 9. Parking

This section deals with the 16% of representations expressing the view that the proposal does not take account of parking needs. Three issues were raised:

- the pressure on parking in Tisbury village caused by overspill from the existing railway car park
- the Neighbourhood Plan's requirement that current and future requirements of the railway station (following the line enhancement) are addressed by development
- lack of parking provision for the proposed Care Home and dwellings

### 9.1. Local Parking Capacity



- A number of representations pointed to difficulties in parking in Tisbury village, lack of capacity at the existing Nadder Close village car park, linking this to the use of the village car park as a free overflow for those using Tisbury railway station.

- Hand icon* *Parking on the high street is already almost impossible*
- Hand icon* *Parking provision is currently a serious issue in the village and would be made worse by this development. Due to the number of cars and the limited spaces for parking, cars are regularly parked on double yellow lines. This can restrict the ability of the fire engine to turn. The existing car park is well used and often full so any more cars would simply add to this problem.*
- Hand icon* *Parking could be provided on the site for train users in particular. This will relieve all day parking in the road, the village car park and station car park.*
- Hand icon* *Parking in the village is already difficult and often restricts through movement.*
- Hand icon* *We are very lucky to have free parking in Tisbury, so we can access the high street. An increase in residents (not to mention staff/visitors of the care home) will reduce the amount of available parking, which is already busy.*
- Hand icon* *In normal circumstances there is insufficient parking for station users, village shoppers and workers. The Covid pandemic has significantly reduced the parking requirement and traffic in the vicinity of the station at present, but I believe this to be a temporary situation.*
- Hand icon* *The general parking in the village is currently a nightmare*

### 9.2. Neighbourhood Plan Policy







- Representations pointed to the Neighbourhood Plan policy requirement that the demand for railway parking and needs arising from the future railway enhancement are addressed through the site's masterplan.

- Hand icon* *With increased use of a better, faster train service, the requirement for parking at the station will increase, as will the flow of traffic into the village. The current station car park is reaching full capacity during weekdays and people are parking on Station Road*

-  *TisPlan's requirements for parking provision in association with Network Rail, have been completely ignored*
-  *Provision MUST be made for "Platform 2" on the South side - the site side - of the railway and the necessary parking for those living South of railway line, to allow for the country's desire to move traffic from road to rail*

### 9.3. On-site Parking

- A third concern was the perceived lack of parking for residents and visitors to the proposal site.

-  *There is not enough parking outside the care home for carers, visitors, doctors and ambulances.*
-  *There is inadequate parking provision and I feel isolation for patients/residents would be a real issue*
-  *I don't believe there will be enough parking for the new residents, staff and visitors for the care home*
-  *The parking arrangements for the proposed care home for its staff and visitors are especially sparse;*
-  *The lack of adequate parking will inevitably lead to parking on the access road to the development*
-  *A lack of parking spaces on modern housing developments are currently causing major neighbourhood problems throughout the UK which will be further exaggerated by the recent announcement of car charging points at each and every home for new residential developments.*

Prepared by the TisPlan Steering Group for Tisbury Parish Council

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