

**LAND AT STATION WORKS SITE, STATION ROAD
TISBURY, SP3 6QU
Outline Planning Application PL/2021/09778**

Swallowcliffe Parish Council Response to Consultation

10 November 2021

Following an extraordinary meeting of parishioners, at which 30 were present, Swallowcliffe Parish Council (SPC) has considered the above application. Since the application is divided into two parts, the observations are also divided into two, and are set out below. Although the proposed developments are only indicative and are reserved matters, SPC has reviewed them as they are the reason why the road works on Jobbers Lane are being proposed and they are described in detail in the application and its associated supporting papers.

SPC has also reviewed the objections raised by the Access To Tisbury Group (ATTG) on behalf of eight parishes surrounding Tisbury, including Swallowcliffe, and fully endorses them. This response is in addition to that of ATTG and is the responsibility solely of SPC.

Detailed Consent for Improved Access to the Site

To enhance pedestrian and cycle access from the site into Tisbury the applicant proposes an elevated walkway through the eastern bore of the railway bridge which will require its closure to motor traffic and the installation of traffic lights to control the resultant one way flow through the remaining bore.

Whilst SPC are in favour of the principle of redeveloping this site, SPC objects to these access proposals on the following grounds:

1. The closure of one bore of the bridge will halve the capacity of the only distributor road to the south of Tisbury and will thus divert an unacceptable flow of northbound traffic onto the highly constricted Tisbury Row and then either The Avenue, Park, Cuff's or Duck Lanes. This will reduce access from the south to Tisbury as drivers, including farm vehicles, seek to avoid the threat of delays at the bridge and will adversely affect the well being of residents on these roads. The converse will apply to southbound traffic.
2. The proposed development will reduce accessibility of residents of the Tisbury Community Area (TCA) living to the south of the railway to Tisbury's services and shops, particularly if the Co-op moves to the South Western Pub site.
3. The installation of light controlled one way flows under the remaining bore will slow the speed of response of emergency vehicles. The Fire Brigade have commented that such an arrangement would have to be negotiated with care; it is not clear where vehicles already under the bridge or its approaches could go so as to provide sufficient room for emergency vehicles to get through.
4. The central bore remaining for vehicular traffic is subject to frequent flooding, which will only compound the problems outlined in 3 above. Local weather records indicate that the incidence of flooding has increased significantly this century with the bridge being blocked by two "one in a hundred year" floods in the past 20 years.

There have been two such incidents in the past month, one of which led to premises just to the north of the bridge being flooded. They also led to footpath TISB74 being under water; this is the main pedestrian link by which it is proposed pedestrians from the site access Tisbury. Significant flooding of the bore now occurs on average five times a year, causing drivers to use the eastern bore which is slightly higher.

5. The large scale of the proposals has access implications throughout most of the TCA, yet the application only considers the capacity of Jobbers Lane immediately outside the site, which is described as 5.8m wide and is felt by the applicant to be of sufficient size to cope with the motor traffic likely to be generated by the proposed development. The applicant neglects to deal with the fact that substantial portions of the lanes which connect to the A30 and A350 to the west and south are less than 3m in width, so narrow that in Swallowcliffe alone there are at least three stretches where two cars cannot pass (see example Figure 1). The same conditions exist in Ansty and on routes to the A350. Any significant increase in traffic flow would constitute a heightened danger and loss of amenity to residents of Swallowcliffe.
6. The applicant estimates the indicative development would lead to an increase of on some 40 car borne journeys at each of the peak hours. If only half of these head south toward the A30, SID data suggests this would represent a 15% increase in peak hour flow, a significant increase.
7. Insufficient account has been taken of the likely traffic generated by the care home which will include three shifts of 12 workers, visitors, truck deliveries and specialist waste removal. This would be exacerbated should there be an associated provision of medical facilities for use by local residents.
8. Indicative plans are for some 375 residents living on the site (see Section 3.11 of the applicant's planning statement). In the 2011 Census Wiltshire car ownership was 596 per 1000 population. This figure is likely to be higher now because car ownership has increased and the site is set in a rural area that does not include some of the larger towns in Wiltshire. However even on 2011 county data the indicative population will generate a demand for some 205 parking spaces. Only 191 residential spaces are being provided on site so it is highly likely that overspill parking will take place on Jobbers Lane and Station Road, further reducing capacity and also reducing the attractiveness of Tisbury as a service centre to much of the TCA, some of whose trade will be diverted to Shaftesbury and Salisbury.

On the basis of the submitted documents, there is no evidence that the applicant has considered the wider impact of the proposals on the TCA road network, nor alternative means of providing pedestrian access to Tisbury. For example replacing the footpath crossing to the immediate east of the station is not considered despite it being clear from the documentation that it is Network Rail's intention to effect these works for safety reasons. This is to be subject to a cost/benefit evaluation and no doubt a developer contribution would improve feasibility.

In the view of SPC this application should be refused and the applicant invited to reconsider its access proposals as the current proposals constitute a loss of amenity and a threat to the health of residents living on lanes to the south of the site and within Tisbury itself.

Matters reserved for Subsequent Planning Applications

SPC is concerned that if the detailed access element of this application is granted, the maximum scale of developments reserved for future applications will, by implication, be tacitly deemed acceptable, even though they will have to be the subject of subsequent consents. Therefore, observations are made here concerning the indicative developments outlined that constitute the bulk of the current application.

SPC believes that both the nature and quantum of development proposed is unacceptable and in conflict with the Tisbury Neighbourhood Plan (TNP). This seeks to make provision for commercial uses having regard to the needs of the local and currently on-site businesses. We understand there are currently 35 jobs and post COVID vacancies on site. Light industrial and business uses would add to the diversity of economic activity in Tisbury and provide a wider range of employment opportunities than the proposed “up to” 40 bed care home. It should be noted that Tisbury already enjoys the benefit of two such facilities in what is effectively the same use class as residential. An additional home will have to draw from a geographically wider pool of labour, thus increasing trip generation and missing the opportunity to diversify the Tisbury economy.

The TNP also indicates a desirable maximum of about 60 dwellings on site, of which some 30% should be affordable or social. The proposal indicates “up to” 86 dwellings of which only 14% would be affordable. This reduction is justified by the applicant’s assumption that the eventual developer will need to secure a 20% rate of return. However, according to the applicant’s own submission, there is only a 0.1% difference in returns between 14% affordable /social provision and 30%; both options showing a 23% return on cost. Given such a high return there would seem to be scope for improved access arrangements that do not involve the half closure of the railway bridge to vehicular traffic.

In sum, SWC’s reasons for objection to the indicative component of this application are

1. The scheme would represent overdevelopment in an AONB and is at such a scale that it would exercise a deleterious impact on the safety and amenity of Swallowcliffe residents
2. The proposal is at odds with the TNP’s aim for mixed uses on site and with an increase of up to 425 residents (estimated as around 15% of the wider Tisbury population) would seriously overload the services Tisbury provide to its TCA.

For the avoidance of doubt these reasons are in addition to the other reasons for objection scheduled above under Access.



Figure 1: Example of a Pinch Point on Swallowcliffe's Main Access Road to Tisbury (West End)