

Response to Tisbury Station Works Outline Planning Application Ref PL/2021/09778 from the Access To Tisbury Group (ATTG)

Introduction

The Access To Tisbury Group (ATTG) comprises five parish councils neighbouring Tisbury each with sufficient concern about the proposed Station Works development to come together to object to the above Outline Planning application.

ATTG represents the parishes of Ansty, Chilmark, Fovant, Sutton Mandeville and Swallowcliffe. It represents a substantial number of local people in the communities surrounding Tisbury all wanting to see Tisbury continue to thrive. We are supporters of Tisbury and its community and not in opposition to it. However we are concerned about the considerable adverse impact we believe the proposed development will have on the surrounding villages and also on Tisbury itself.

The Outline Application

We understand and support the desire to use the Station Works site to benefit local people wanting housing, whether social, affordable or market housing or wanting job opportunities or the opportunity to start or develop a business.

The Wiltshire Core Strategy 2015 provides for modest levels of development including affordable housing with modest growth of both housing and employment to ensure development is balanced, thus helping to minimise out-commuting. It also states in the Core Strategy Spatial Vision for 2026, that Service Centres, eg Tisbury, will be more self-contained.

- Wiltshire Core Strategy 2015, Core Strategy 1 states. “ *Local Service Centres will provide for **modest levels of development** in order to safeguard their role and to **deliver affordable housing.**”*
- Wiltshire Core Strategy 2015, clause 5.145 states “*The strategy for Tisbury Community Area is to provide for **modest growth of both housing and employment to ensure development is balanced, thus helping to minimise out-commuting** and also to provide support for local services and communities”*
- Wiltshire Core Strategy 2015, clause 3.1 Spatial Vision states “*By 2026 Wiltshire will have stronger, more resilient communities based on a sustainable pattern of development, focused principally on Trowbridge, Chippenham and Salisbury. Market towns and **service centres will have become more self-contained** and supported by the necessary infrastructure, with a consequent reduction in the need to travel.*”

However this scheme massively overprovides residential and care home accommodation which far exceeds Tisbury’s requirements and far exceeds the housing targets set to be achieved by 2036. It is not balanced in terms of accommodation and employment, it is not helping to minimise out-commuting and it is not making Tisbury more self-contained.

Wiltshire Council Local Plan January 2021 shows that 135 dwellings had to be delivered in the Tisbury Local Service Centre between 2016 and 2036. As of April 2019, 70 of the 135 homes had been accounted for, leaving just 65 further dwellings to be provided before 2036. This requires a delivery rate of less than 4 homes per year. We recognise this is not a ceiling on the provision of dwellings, but the current rate of expansion with small/modest local schemes is set to significantly exceed this figure.

Small and modest schemes expand Tisbury in a sustainable way, where the growth in employment and infrastructure can grow in tandem with the housing expansion. Drip feed expansion in Tisbury is

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ongoing and recently there have been proposals for ten new dwellings on the Tisbury Motors site in the centre of Tisbury and a Land Trust scheme for a number of affordable dwellings adjacent to the Nadder centre. There is no shortage of smaller proposals coming forward to provide steady sustainable growth. This is entirely consistent with the Wiltshire Core Strategy 2015 referred to above.

The benefit for Tisbury residents arising from a large residential scheme is inevitably limited to those currently in need of housing and therefore the benefit of additional housing would likely be similar were the Station Works scheme merely half its proposed size or indeed much less. Consequently a significant proportion of the 86 new dwellings introduced over a short period will inevitably be occupied by incomers who, without additional employment opportunities in the village, would need to commute daily for work, confirming the irrevocable transformation of the village from local hub into a residential home for commuters.

The Planning Statement submitted with this Outline Planning submission quotes out of date 2015 housing requirement figures, which were superseded in Wiltshire Council Local Plan, January 2021, Looking to the Future, Empowering Rural Communities.

Referring to Page 27 of the Planning Statement submitted with this application, it states, "An overall housing requirement of 420 dwellings is set out in the Core Strategy for Tisbury and following discounting of committed developments, 197 dwellings remained to be delivered over the plan period."

The housing requirement that remained in April 2019 was 65 dwellings, not the 197 quoted in the planning submission. This amply illustrates the point that the size of this proposed scheme is out of kilter with what is thought appropriate for Tisbury.

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.

This large over provision of residential accommodation comes with serious negative impacts on Tisbury's roads and broader infrastructure which will be harmful to the Tisbury community and the wider community in the surrounding villages.

We therefore conclude that the current proposal should be rejected on the basis that it is contrary to the fundamental principles set out in the Wiltshire Core Strategy and as a consequence would be very damaging to Tisbury and its surrounding neighbourhoods. The proposal is for an excessive level of residential and care home accommodation which is inappropriate for Tisbury and will generate excessive amounts of additional traffic. This additional traffic, as we discuss below in relation to our comments on access, will inevitably have unacceptable implications for our road network within Tisbury and in the villages and communities surrounding Tisbury.

Access To and From Tisbury

The access issues arise from a clash between the limitations of the existing road network surrounding Tisbury and the nature and scale of the proposed Station Works development.

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We calculate the proposed development would increase Tisbury Parish's population by some 15%, which at current levels of car ownership in the county will increase traffic flow onto the local road network by at least the same proportion.

The limitations of the existing road network arise principally because Tisbury, unlike all the other Local Service Centres in Wiltshire e.g. Wilton, Downton, Mere etc, does not have an "A" road to provide vehicle access to the village.

In fact the situation is worse than this, because Tisbury is not accessed by a "B" road either and all the cars and commercial vehicles going to and from Tisbury rely on country lanes for access. These country lanes are narrow and on some principal routes are single track, allowing vehicles to flow in just one direction at a time.

The main routes into Tisbury from the north are both restricted and either pass through the listed Fonthill Park and the grade one listed archway or pass through the single lane tunnel on the road from Hindon. Neither is suitable as a main feed into Tisbury. These both connect into Hindon Lane which already has significant congestion issues.

Coming into Tisbury on the east side is another feeder route from the north and the A303. On this route vehicles have to negotiate the ancient grid alignment of roads through the older part of Chilmark, with its sharp angular bends in the road, which are unsuitable for any significant volume of through traffic.

The main routes into Tisbury from the A30 to the south are either through Ansty or through Swallowcliffe. Both these routes have a narrow single lane section where you cannot see to the other end to know if a vehicle is already on the single lane heading towards you, which will necessitate reversing. These access routes are already problematic for cars and commercial vehicles.

The proposed residential expansion needs to be put into context, in that it comes after a succession of housing development schemes in Tisbury i.e. Churchill estate, Lady Down, High View, Castle Mount, Spring Field Park, Snows Hill and the 90 home Wyndham Place. This expansion is all within a modest sized rural village where the access roads have not changed during this time. This expansion over the years together with the growth in online shopping, growth in deliveries and greater car ownership have used up any slack in the vehicle capacity of the surrounding lanes that serve Tisbury.

In addition to the housing expansion, a 40-bed care home will further exacerbate the traffic problem. Care homes throughout the region, including the smaller Albany House care home in Tisbury, have difficulty recruiting staff. The proposition that care home use will provide much needed local employment therefore seems unlikely and in reality suitably skilled staff will need to commute from far and wide into and out of Tisbury on a 24/7 shift basis in order to service this care home. In addition to staff there will be visitors, peripatetic medical staff and associated professionals, commercial services providing the laundry service, the catering needs and waste disposal, now more considerable with Covid 19 etc. This traffic is in addition to that generated by the 86 proposed dwellings and will add further to the traffic count through the neighbouring villages, as well as Tisbury itself, during both day and night.

Pausing for a moment to see how this all squares with the Wiltshire Core Strategy 2015, we draw your attention to Clause 5.146 which states *... "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***

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takes account of the constraints presented by narrow access roads and the sensitive landscape of the AONB”.

Regrettably the design does not provide modest new growth or address the constraints presented by narrow access roads or the sensitive landscape.

Whilst the engineers Campbell Reith have carried out a desk top traffic study, they have not considered or perhaps recognised the lived reality this increasing traffic has on the surrounding lanes and villages.

There is already congestion at the pinch points, frequently the cause of altercations and stand-offs in the road. But in addition and perhaps more importantly is the impact on health and well being. There are cottages and houses with their front wall up against the road, where every passing vehicle impacts on the occupants with its noise, vibration and fumes. Walking along these lanes to visit neighbours or to go for a walk is hazardous and unfortunately more frequently avoided because often with no pavements you have to walk in the road.

Regrettably insufficient consideration has been given to the impact this scheme would have in the villages and communities on the minor roads which provide the only access to Tisbury.

We have to conclude that the impact of the vehicle expansion on the surrounding communities has not been adequately considered, but discounted on the basis of a desk top approximation, which fails to reflect the actual situation experienced by residents on a daily basis. We therefore believe the limitations of the existing road network and adverse impact on so many residents living in the areas surrounding Tisbury gives more than sufficient grounds to reject this Outline application.

Access within Tisbury

In addition to the impacts on the access routes into and out of Tisbury, there are also very considerable access issues within Tisbury itself. Tisbury High Street, a commercial and social success story that all of us are keen to preserve and sustain, is currently just manageable in terms of congestion and parking, but will cease to be an easy and pleasant experience and be blighted by frustration and avoidance if vehicle numbers increase further.

Given the finely balanced traffic situation currently in Tisbury High Street, additional vehicles will cause blockages and chaos. The vehicles wanting to park will significantly outnumber the parking spaces that can be provided. This already happens at peak times.

This will be exacerbated further because there is no direct pedestrian route from the Station Works development into the centre of the village. The current proposal to route pedestrians on a circuitous route along the full length of the estate road to Jobbers Lane and under the railway arch before heading in a direction towards Tisbury will force residents to use their cars for these short journeys. This is unsatisfactory. Without the provision of a pedestrian bridge, the route into High Street is convoluted and indirect, extending the walking distance considerably and making walking with shopping unviable for most.

The proposal to close one arch of the railway bridge to vehicles and the introduction of traffic lights to allow alternate flows through the remaining vehicular arch will be detrimental and again demonstrates that the access arrangements are unacceptable. It is wrong that a new development should feature such a retrograde step for the remainder of the local community.

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We have learnt from the recent flooding in Tisbury (October 2021) when the water level rose some 0.5m above previously recorded heights, that the entrance to the development is going to be compromised by flooding on occasions preventing access and egress to this development. There is only one access to the development. This flooding was not caused by bad drainage. It was caused by the adjacent river Nadder not being able to cope with the water from its catchment, causing it to flood the adjacent land, road and houses.

It is unacceptable to be constructing a development that we know will be compromised by flooding. All the evidence is that the flooding situation is going to worsen, a fact acknowledged in the planning submission, where further freeboard is allowed on the cycle/pedestrian way, to allow for higher water levels due to climate change. Knowing this is the situation at this initial stage of planning a development, it is incumbent upon us not to hide from the facts, but to recognise that this development should not proceed further in its current form. The evidence is there, that it will be unacceptable for new housing and a potential disaster for a care home where there are times it cannot be accessed.

During this recent flooding one arch under the railway bridge was blocked by a van disabled by the flood water. This arch remained blocked by the van for some considerable time after the water level had reduced. However traffic could start to pass again by using the second vehicle arch. This would not be the case if vehicle access is reduced to just one arch. Taking away an arch is the wrong approach. We should be building resilience into our infrastructure and not taking resilience away.

We request that Wiltshire Council's review of this application seriously considers the impact of the raised walkway/cycle way which runs from the development's access road, through the bridge arch to a position almost level with Stubbles footpath. Due to the regular flooding in this area this structure is raised some 700mm above existing ground level on concrete plinths, which support deep steel beams of a similar depth to the plinth height, with metal railings attached to the beams. This urban structure, typical in areas like London Docklands, is going to look completely out of context with the rural village setting. This is a further imposition on the local community which is expedient for the developer, but detrimental to the streetscape and village environment.

We consider these adverse impacts on Tisbury reinforce the case to reject this application.

Conclusions

- Having reviewed this Outline application we conclude that it does not provide what Tisbury needs or the sort of development envisaged by the **Tisbury Neighbourhood Plan**.
- The proposal is contrary to the basic development principles clearly set out in Wiltshire Core Strategy 2015. Principles that we would fully endorse. For example, ***modest levels of development, modest growth of both housing and employment to ensure development is balanced, minimising out-commuting, becoming more self-contained.***
- The scheme has excessive residential and care home accommodation at the expense of a more mixed and sustainable development, which would develop the community as a whole. The current proposal will promote a dormitory for the wider region.
- The exclusively residential nature of the development, its density and its scale will result in high and unacceptable traffic generation causing not just damage to our environment, but also to the well being of our residents and communities on these access routes into and out

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of Tisbury.

- The High Street and the surrounding narrow country lanes with their constrictions which give access to Tisbury have absorbed Tisbury's residential expansion and associated growth in traffic over many years. Blockages, conflicts and aggression now occur on these roads on a regular basis and further expansion on the scale proposed cannot be accommodated without these issues becoming more serious and difficult to manage.
- The recent flooding in Tisbury has demonstrated that the access to the proposed development will be compromised by flood water from the Nadder river and we can expect this to become a more frequent occurrence with climate change.
- A van disabled by the recent floods, prevented traffic from passing through one of the railway bridge arches and reinforced the need for resilience and a second arch for traffic.
- The scheme lacks respect for the Tisbury and wider community.

On the basis of the above we believe this application should be refused consent.

This response is submitted on behalf of the Access To Tisbury Group, comprising:-

Ansty Parish Council

Chilmark Parish Council

Fovant Parish Council

Sutton Mandeville Parish Council

Swallowcliffe Parish Council