



Townsend Farm, Poulshot – Gaiger Brothers Proposed Redevelopment

May 2023 Update to Poulshot Parish Council & Local Community

APPENDIX 1 & 2

Appendix 1: Summary of additional comments (to the provided feedback form) received following July 2022 public consultation event

- This is doubling/ increasing the size of the Townsend side of the village outside of policy
- Additional housing will create greater pollution.
- This is a rural area not a housing estate.
- I think this will be a positive thing for the village.
- Do we need social housing? (this person disagreed with amount and type of affordable housing proposed).
- Poor water pressure in existing supply being reduced further by extra housing.
- We have concerns about the effect on water supply to the other end of the village by adding 14 houses further down the line. At present the flow rate is not good enough.
- Concerned about capacity of foul drain.
- Concerned about capacity of electricity supply.
- Nice idea of pond but could it be fed with roof run off and overflow to ditch.
- I think it would be a nice idea to put a path from 30mph sign to dual carriageway for the whole village to gain from.
- The road outside the entrance to the development needs resurfacing.
- The road surface outside the proposed development is probably the worst in the village and is a bit of a hazard for cyclists. If this is improved it will increase safety and enhance the appearance of the development.
- Not sure how this sits with the core strategy, however I have no objections although it is sad to lose a working farm.
- If the look of the proposed housing follows the photos of examples then it would enhance what Poulshot offers.
- Although the area alongside the road is owned by the council it would be aesthetic to have grass verge. Parking there would be open to abuse / would obscure vision when leaving the new site.
- I would like you to take a holistic approach to our village and assess what is needed as part of the Section 106 Agreement.
- The cottages proposed at the front of the site may be better designed to reflect the existing former Coach house building at 1/ 1.5 storeys in height
- A barn conversion style dwelling (similar to photo example provided) could be incorporated to reflect evolution of agricultural buildings.
- Cumulative impact with Higher Green Farm approval would increase traffic and vibrations – a speed limit with passive measures and active enforcement may help mitigate
- Agree with principle of development but should not be sold onto another developer
- Covenant should be added to prevent future development of proposed gardens
- Concerns that allowing this scale of development in a Small Village may affect the future status of the village and set an unwanted precedent for similar or larger scale development at the village
- There are lots of existing larger village dwellings – more should be 3-4 beds.

- Perception of shortage of larger affordable dwellings – at least one should be 4bed
- General layout seems suitable – character of dwellings should reflect the village variety
- How will land to rear of site be managed and will public have access to this?
- Balancing pond is in keeping with village if water kept at a reasonable level – how will this be managed?
- Welcome proposed continuation of footpaths but note lack of dropped kerbs in key locations and some in tricky places (i.e. on bend) – thought needs to be given to crossovers. Prefer bound gravel over tarmac finishes.
- Can it be ensured Mill Lane Post Box is accessible from path?
- Residential use is acceptable if agriculture is ruled out but should be 10 dwellings maximum
- Location of site entrance/ exit is too close to bend. One suggestion it should be more centrally placed between bends
- The significant rodent population needs dealing with to avoid infestation of nearby properties
- Noise and dirt should be kept to a minimum during construction
- Unhappy about proposed access/ egress arrangements and suggests a one-way in and one-way out system would be better (plan provided)
- Not happy about proposed car parking facilities for new residents
- Accept that the evolution of the village/ this site is inevitable but concerns over 2 storey heights (thought 1.5 was discussed) and scale (both numbers of and the size/ distribution of dwellings) is out of character with the area.
- We note your acknowledgement of drainage matters but reiterate it is of concern given that the road and part of site have been impassable twice in the last 2 years, due to flooding following reasonable rain.
- Sad to see loss of another farm given rising food prices
- Hope quality of design is not eroded due to increasing building costs (or that numbers later increase).
- Affordable dwellings will take up a lot of parking area at front of site/ may spill onto road
- Children from dwellings at front of site could play directly near road which is unsafe – these should be relocated to north
- We strongly recommend that all contractors vehicles should access/egress the site from/to the south junction with Bulkington/Worton Road – the road is not sufficiently wide for two large vehicles to pass resulting in damage.
- Do not want to see industrial units on the site
- Concerns that not enough time/ thought being given to local views
- Generally supports the proposed redevelopment. Questions whether farm is, in fact unviable given associated land in arable usage
- Proposal is contrary to policy – it is outside of the defined policy limits and at the smaller villages is only permitted at an infill scale. It is not sustainable and is not being brought forward via DPD process or a NP. It is a conservation area, will impact on dark skies, the setting of listed buildings and the site has not been marketed.
- Outside the built-up area of the small villages, residential development is generally only supported in order to meet needs for affordable housing (CP44) or to support employment essential to the countryside (CP48). Which is why I guess an independent affordable housing need survey is being circulated but it was not clear that the two are connected please can you confirm if there is a link and if this has been made clear to all recipients?
- Was flood survey just a desk top survey?
- This part of Poulshot Rd is particularly hazardous. The increase in movements will considerably increase risk of accidents.

Appendix 2: The following topics represent a broad summary of the ‘other comments’ made (as listed in Appendix 1) as part of the July 2022 consultation feedback, and associated applicant responses or points of action. This list is not exhaustive but covers many of the key or repeat issues arising.

1. Traffic & the state of the Poulshot Rd

Four main points relating to traffic and highways were voiced. These are summarised as

- safety of the proposed access,
- vibrations and pollution
- construction traffic concerns along with associated noise and disturbance
- traffic speeds through the village in general.

A separate issue was also raised expressing frustration at the existing condition of the Poulshot Road at the front of the site.

Highway Safety and the positioning of the access points with respect to nearby bends

The proposed arrangements have been designed by an experienced Highways Consultant who has had full regard to the local situation, including available visibility, speed limits and actual vehicle speeds. The position of the access has been designed to reflect this evidence and is shown to be appropriate to serve the needs of the development, without causing any unacceptable harm to highway safety. The proposals result in the removal of all agricultural traffic from the farmyard site and the consolidation of the existing access points to provide a single main point of access. Nonetheless, we have engaged with Wiltshire Council through submission of a full pre-application enquiry, to establish the Highway Authority’s views on the proposal and these confirmed agreement to the principle of the access as proposed.

Vibrations and Pollution

It must be remembered that all existing agricultural movements to and from the farm buildings and within the site will permanently cease as a result of this proposed redevelopment. The movements associated with the existing established use include large numbers of trips by heavy agricultural vehicles, including regular movements by tractor (often with trailer) as well as seasonal peak activities of more intensive movements at grass/silage and maize harvest, daily visits by the herdsman and other farm-workers and of course the regular movements to and from the site of large lorries shipping feed and of the dairy tanker. In view of the numbers of daily existing vehicle movements along this road by commuters, villagers and those accessing local schools and nurseries, it is not considered that the proposed movements (proposed to be now largely by private car), would have a material impact on vibrations and pollution over and above the existing situation. Nonetheless, it should be noted that the proposals make provision for Electric Vehicle Charging Points for each property so as to encourage the uptake of electric vehicles at the earliest opportunity, which would also help to address related concerns.

Construction traffic/ noise/ disturbance

A number of parties expressed concern over large construction vehicles accessing and egressing the site including the route for construction traffic and potential for noise and disturbance to nearby residents. It is anticipated that construction routes, working times and measures to keep noise and disturbance to a minimum, would be agreed as part of a Construction Environment Management Plan. These are a usual planning requirement, with a planning condition normally imposed on any planning approval to require the detail to be submitted, agreed and followed.

Traffic Volume & Speeds

The traffic arising from the proposed development was voiced as a concern by some residents, with specific mention of speeding traffic through the village and the cumulative impact taken together with other new developments in the locality. The development impact is considered to be limited when considering the modest increase in movements against background traffic levels and the off-setting of existing site vehicular movements. Furthermore, traffic survey data at the frontage to the site confirms average speeds are below the 30mph and 85th percentile speeds at 33mph and review of accident data does not point to any underlying material road safety issue.

Notwithstanding this, we understand that the Parish Council remain keen to explore the potential delivery of traffic calming measures including new village 'gateway' features at both ends of the village, and/or other supplementary measures to encourage lower traffic speeds in response to these existing concerns. We have subsequently broadened our review and additional traffic surveys at the 30mph speed limit change south and north of the village have been commissioned and have confirmed recorded 85th percentile speeds approaching 40mph at both locations. We will continue to engage with the Parish Council on these matters, review further data and are willing to consider supporting delivery of localised traffic calming proposals directly related to the site, and subject to Highway Authority approvals.

One response also suggested that a new footway could be provided along the full length of Poulshot Road to connect to the A361 (Devizes to Melksham road) to the north. This redevelopment is proposing to deliver a section of footway between Townsend and Mill Lane, enabling a continuous connection from the site to the village green; and an alternative permissive route from the site to POUL3 public right of way providing an alternative recreational route to the village green. These measures will improve pedestrian accessibility and are considered to be directly related to the development and proportionate in scale/cost. It is recognised that any additional footway improvements from the village centre to the A361 to the north would further improve pedestrian accessibility, however they remain subject to further feasibility review and would not be directly related to the development or proportionate and therefore remains subject to alternative funding and delivery routes.

The state of Poulshot Rd at the front of the site

Any works to the highway required as part of the access would allow for some remediation/improvement; however the wider state of Poulshot Road is an existing issue over which the applicants have no control – Wiltshire Council as the Highway Authority are responsible for highway resurfacing works. The applicant understands that the Parish Council is seeking earliest possible highway maintenance improvements in the village through discussion with Wiltshire Council.

2. Landscaping/ potential parking at the front of the site and parking in general

Some concerns have been raised about the potential for indiscriminate parking at the front of the site; the parking capacity for the development and proposed landscaping including surfacing of pathways.

At the site frontage to Poulshot Road there is an area of land (c5-6m wide) between the edge of the road carriageway and the Townsend Farm site boundary. This land falls within highway land and Wiltshire Council ownership: at present this area is poorly maintained and has historically been used for ad-hoc parking and servicing to the Townsend Farm site and is currently occasionally used by some parents at the pick-up/drop-off times to Townsend Barn nursery to opposite the application site. The access proposals will tidy this area up and deliver a new footway adjacent to

the site boundary and re-introduce a grass verge between the footway and edge of carriageway consistent with the local area, subject to Highway Authority approvals.

There is plenty of room within the site to cater for the new development including parking requirements which will be designed into the site layout and are based on the Council's Minimum Residential Parking Standards and also includes the required visitor car parking spaces.

3. Flood risk and Drainage

Responding to concerns raised by neighbours from the outset of the community engagement, the consultation display boards included comprehensive information on flood risk and drainage matters in relation to the proposed redevelopment. Some parties continued to raise concerns in respect of historic foul sewer and surface water drainage issues within their additional comments.

The July 2022 consultation material outlined the background, maps, early risk assessments and tasks that had already been undertaken to demonstrate a thorough understanding of these issues in taking the scheme forwards.

These preliminary tasks have included:

- Site visits undertaken
- Clearance of on and off-site drainage ditches
- Topographical survey of site & Poulshot Road frontage
- Review of publicly available flood records
- Wessex Water asset records obtained
- Wiltshire Council highway drainage records obtained
- Infiltration testing completed
- Consultation with Wessex Water regarding foul water connection & capacity checks

The risk assessments identified that firstly, that the site is located wholly in Flood Risk Zone 1 (lowest risk), the lowest level of flood risk from a watercourse.

As regards surface water, the Environment Agency's 'Risk of Flooding from Surface Water Map' indicates where surface water may be expected to flood or pond when rainwater does not drain away through normal drainage system or soak into the ground, but lies on or flows over the ground instead. Clearly this is heavily influenced by the site's existing characteristics, such as the extent of hard surfacing and low points. This map shows that whilst the site is predominantly at very low risk, some isolated spots are at a medium / higher risk (largely around the existing slurry lagoon).

The supporting information then explained how the redevelopment proposal will manage constraints by avoiding areas of higher flood risk, introducing a Sustainable Drainage System (SuDS) designed to current standards & substantially reducing the impermeable area on the site compared to the existing site (see #8 'Development proposals – Concept Site Plan), providing betterment by significantly reducing runoff rates and volumes and surface water flood risk. Again, it is hoped that this level of understanding and comprehensive approach should offer reassurance to nearby residents.

Foul water concerns were also raised by some immediate neighbours in response to the initial consultation. In addition to their usual enquiries, this feedback prompted the applicants to approach Wessex Water with some specific additional questions. Their detailed responses and overall comments were included as part of the presentation. This concluded in Wessex Water confirming

they have ample foul sewage capacity to accommodate the proposed development going forwards, which should be reassuring to local residents.

Any full planning submission will include a full Flood Risk Assessment report including a Surface Water Drainage Strategy supported by detailed calculations to show how the site is to be drained. This will need to demonstrate the proposed development can be delivered safe from the risk of flooding (including allowance for future climate change) and most importantly without impacting on the flood risk of existing neighbouring properties this. Any such document will be subject to Wiltshire Council review and approval in their role as the Lead Local Flood Authority (LLFA).

Some specific queries have been raised by individual residents who asked for example, about whether the operation of sluice gates in the vicinity of Melksham could influence the situation. This has been answered by our Flood Risk Consultants who confirm these *'are unlikely to have an effect on surface water flooding from intense rainfall events or capacity of sewers / ditches in the village of Poulshot which are the predominate flood hazards in the vicinity of the site. The sluice gates are very remote from the site and would very unlikely have a material effect on the watercourse or its associated floodplain to the southwest of the village. The village is situated further up the catchment and at a higher elevation than the watercourse and any influence on flood hazards will likely be as a result of more localised factors (e.g. blockage of drain or ditch) rather than interventions in the downstream watercourse catchment (such as operation of sluice gates).'*

We trust that the approach taken to date, coupled with the rigorous standards which must be demonstrated as part of any subsequent planning application going forwards, will not only fully address these matters but shall also help to satisfy the concerns of local residents.

4. Utilities

Wessex Water are the authority responsible for providing potable water supply. A number of residents raised specific concerns in relation to sufficiency of water pressure. This has again prompted the applicant to approach Wessex Water for more detailed confirmation about the adequacy of supply capacity, in addition to various specific queries to establish the supply source and route, the effect of pressure return valves, and whether there are any current known issues.

Wessex Water have confirmed the capacity for adequate water supply for up to 14 new houses at the site (in line with the inquiry made). They have also answered various specific queries in relation to the water pressure issues raised allowing this information to be passed onto the concerned individuals.

As part of their response, Wessex Water have advised the industry standard required by the Regulator which is a minimum flow rate of 9 litres / minute at 1 bar at each customer stop tap, sufficient for a two-storey building. Wessex Water policy goes further and guarantees a minimum 1.5 bar pressure at the customer stop tap. These are the minimum operating standards that they are measured by and the only pressure that they will officially guarantee across their networks.

Wessex Water continuously manage the public water network to ensure that regulatory service standards are maintained at all times throughout the day (9 litres/minute at 15m head), Pressure varies during the day and seasonally depending on the demand for water placed on the supply system. They have advised that their system is monitored on an exceptions basis and that they have no known outstanding issues.

Adequacy of electricity supply to service the proposed development at the site, has also been confirmed by Scottish and Southern Electricity Networks (SSEN) for the proposed 14 dwellings including for the proposed Electric Vehicle Charging points, subject to developer funded infrastructure improvements.

5. Location of public open space and its management including pond

The preliminary reports and the constraints and opportunities plan suggested that proposed buildings be concentrated in similar locations to existing development on the site, with development fronting Poulshot Rd and less dense development towards the north of the site to integrate with adjacent countryside. Additionally, the preliminary drainage strategy has identified a requirement for a balancing pond.

It is clear that the site itself is quite large for the number of houses being proposed, but the scale of the development is being driven by sustainability factors along with community appetite, bearing in mind the underlying viability needed to make the development work.

Planning policies determine that both informal open space and equipped space ought to be provided by the development (whether on or off site). Consequently, there are various decisions to be made about whether public open space should be made available on site; the form this should take; how this is integrated into the development and how this is managed. The feedback from the community and the parish is welcomed in this regard.

Discussions with the parish council are ongoing and this will continue alongside pre-application discussions with Wiltshire Council to help determine the best approach. At this stage, it is envisaged that the responsibility of any onsite public open space, including the balancing pond will likely be undertaken by a private management company controlled by new residents. The integration of this space with the proposed pedestrian link between Poulshot Road and Broadway / Byde Mill Lane means this link will need to be open to public access / use.

As the site is not of a sufficiently large scale to warrant onsite equipped play, it is envisaged that open space financial contributions will go towards upgrading existing parish equipped play facilities.

Any surplus land, not needed as public open space or private gardens, is proposed to be returned to agricultural use. Again, we trust that this engagement process demonstrates the applicant has listened and is responding positively to the concerns raised by neighbours and the parish council.

6. Affordable dwellings – type and mix, and overall housing balance

The specific feedback received in this regard has been noted and discussions with Poulshot Parish Council, the WC Housing Team, the Wiltshire Council Urban Designer, Wiltshire Council planners and the results of the Housing Needs Survey, will all be utilised to inform the ultimate mix/ tenure and sizes.

It is appropriate for any form of housing development to provide a balance and mix of tenures and property sizes in order to promote a balanced community. In smaller scale housing developments, such as this and where 30% is affordable housing with tenure and size indicated by external factors, and there are a number of substantial other costs to be factored, some of the properties will also necessarily need to be higher value examples for the redevelopment to be viable. Although the majority of respondents to the feedback sheet supported the overall housing mix/ tenure etc, the applicant nevertheless recognises the comments received and will continue to review the housing mix.

7. Housing numbers/ Policy conflict

Notwithstanding the proposed housing numbers received widespread support on the feedback sheet (with almost 70% supporting the proposed housing numbers), we have been clear including as part of the July 2022 public consultation that *'In planning policy terms, Poulshot is designated within the Wiltshire Council Core Strategy (current adopted Local Plan) as a 'Small' village and accordingly would typically only be expected to accommodate small scale infill development. This proposal at Townsend Farm would not conform with that broad policy direction, however, there remains a need to assess the site as a former farmyard and how best to reuse the site.'*

All planning decisions, whilst being considered against the Development Plan, are also the subject of 'other material planning considerations' to arrive at a balanced planning judgement. The pre-application submission to the local planning authority, sought the local planning authority's input on this specific matter, with reference to five known examples within the Wiltshire Council (eastern) area where similar redevelopment of farm sites to residential use has been permitted. It is also relevant that the Development Plan (the Wiltshire Core Strategy) is not considered up to date, as the Council currently have an acknowledged housing supply shortage and so this must also be factored into any judgement by Wiltshire Council.

As noted above, due to the scale of the site, constraints and costs including (but not limited to) the affordable housing requirement, remediation, demolition and removal of existing structures and hardstandings, landscaping, and other contributions, it is envisaged that the housing numbers/ mix are around the minimum needed to make the site work.

A full planning case covering this matter will be contained within the Planning Statement submitted with the formal planning application.