

## REPORT TO THE STRATEGIC PLANNING COMMITTEE

<b>Date of Meeting</b>	12.02.2014		
<b>Application Number</b>	W/13/00643/FUL		
<b>Site Address</b>	Land South West Of Kingston Farm Buildings Holt Road Bradford On Avon Wiltshire		
<b>Proposal</b>	Mixed Use development comprising 138 dwellings, new employment space, on site public open space, community allotments, offsite highway and drainage works and a strategic landscaping scheme		
<b>Applicant</b>	BOA Property Ltd & CG Fry Ltd		
<b>Town/Parish Council</b>	Bradford On Avon		
<b>Electoral Division</b>	Bradford On Avon North	<b>Unitary Member:</b>	Rosemary Brown
<b>Grid Ref</b>	383238 160811		
<b>Type of application</b>	Full Plan		
<b>Case Officer</b>	Mr James Taylor	01225 770344 Ext 01225 770249 james.taylor@wiltshire.gov.uk	

### Reason for the application being considered by Committee

The proposal is for a development of a significant size outside of the current limits of development in the Local Plan on a site identified for strategic growth in the draft Wiltshire Core Strategy.

Councillor Rosemary Brown has called this application to committee if officers are minded to approve the application due to the:

- \* Detrimental impact on air quality;
- \* The narrowness of Holt Road; and
- \* The lack of infrastructure in the town.

### 1. Purpose of Report

To consider the above application and to recommend that planning permission be granted subject to the satisfactory completion of a legal agreement and conditions.

### Neighbourhood Responses:

24 representations received with a mix of support, concern, and largely objection.

## **Parish Council Responses:**

Bradford on Avon Town Council: “No objection”

Holt Parish Council: “Support”

## **2. Report Summary**

The main issues to consider are:

- \* Principle of development;
- \* Viability and affordable Housing;
- \* Planning contributions;
- \* Sustainable development – Economic, Social, Environmental;
- \* Urban Design;
- \* Landscape and Setting;
- \* Trees;
- \* Open Space;
- \* Heritage assets including Conservation Area, setting of Grade II historic park and garden  
And setting of listed buildings including the Grade I listed ‘The Hall’;
- \* Archaeology;
- \* Highways;
- \* Air Quality;
- \* Residential amenity;
- \* Ecology;
- \* Drainage;
- \* Green Belt; and Land contamination.

## **3. Site Description**

The proposed development site occupies part of the Kingston Farm estate which extends to circa 300 acres of arable, pasture, woodland and a 5 MW Solar PV Farm extending from the existing eastern edge of Bradford on Avon to the east towards Staverton. It is bounded by Holt Road to the north, and the railway line and river to the south.

The planning application site of approximately 10-11 hectares largely comprises open arable fields (circa 8ha) but also includes the existing Anthony Best factory, copses of trees and open land adjoining the Solar PV Farm. Furthermore it includes highway authority land required to accommodate the off-site transport and foul drainage infrastructure works; and land accommodating surface water drainage infrastructure that links to an existing watercourse that connects to the river Avon.

To the north the site is bound by the Holt Road (B3107); to the east by the existing cemetery and Solar PV Farm; to the south by a strip of steeply sloping retained agricultural land, railway line and River Avon; and to the west by The Hall's Grade II listed historic park and garden.

The main development area of the site is currently allocated in the existing local plan as "safeguarded land" under policy GB3 to "meet the longer term development needs of Bradford on Avon" and "for future development that may be required beyond 2011". Under the emerging Wiltshire Core Strategy the site has been allocated as a strategic development at Appendix A for a mixed use of "up to 150 houses and 2-3 hectares employment land".

Within the existing local plan a relatively small proportion of the application area to the western end is located within the town policy limits of Bradford on Avon, all other areas of the site are located in open countryside which is designated under policy C4 as the historic landscape setting of Bradford on Avon.

The area within the town policy limits also lies within the Conservation Area. It is also important to note that The Hall, to the west of the application site, is Grade I listed and its associated gardens, which bound the application area, are a Grade II listed park and garden. To the west of the site and running under the south west corner of the site there are caves. The uses in this location are already mixed with The Hall being a residential property but there are also the well established businesses of Moulton Bicycles and Antony Best Dynamics.

To the north there are trees flanking the Holt Road which are subject to tree preservation orders (TPO). There are also two trees within the centre of the site that are covered by TPOs. There is a copse of trees that has recently been subject to additional planting to the south of the site and a further copse of trees towards the eastern end of the site. These do not have any formal protection.

Beyond the application site to the north of the Holt Road is residential development dating from circa the 1960s/1970s.

A relatively small proportion of the application area to the eastern end of the site, beyond the existing copse of trees, extends beyond the safeguarded land into what is formally designated Green Belt. However this part of the Green Belt facilitates Bradford on Avon's cemetery and a 5 MW Solar PV Farm. Beyond this is agricultural land and woodland.

To the south beyond the application site there are flooding constraints associated with the River Avon.

#### **4. Relevant Planning History**

W/11/01064/FUL – Installation of solar PV arrays and associated works – Permission on 17/05/2011.

#### **5. Proposal**

The proposal can be summarised as a mixed use scheme involving the erection of 138 new residential units; the erection of 7,161m<sup>2</sup> (Gross floor space) of commercial development; highway and drainage (foul and surface water) works; public open space, allotments and a strategic landscaping.

The proposals have been subject to detailed negotiation and discussion in particular over issues of viability and the level of affordable housing provision and wider planning obligations.

The final proposals provide for 30% affordable housing (41 units); on-site public open space totalling approximately 2.3 hectares; on- and off-site drainage (foul and surface water) works; on- and off-site highway works and a package of planning obligations totalling circa £1.4m towards education, child care, historic core zone phase 3, GP surgery, leisure, air quality monitoring, traffic regulation orders, travel plans, and cemetery expansion.

The housing element of the proposals involves the loss of 1 existing dwelling (Saltacre) and the creation of 138 new dwellings; a net increase of 137 units. 30% of the units are proposed to be affordable, creating 41 new affordable units. The proposal is for an overall mix of 1, 2, 3, and 4 bedroom units broken down as follows:

97 open market units: - 3 x 1-bedroom; 46 x 2-bedroom; 26 x 3-bedroom; 22 x 4-bedroom

41 affordable units: - 7 x 1-bedroom; 23 x 2-bedroom; 11 x 3-bedroom

A total of 266 allocated parking spaces are proposed including 140 garage spaces which have been oversized to count towards the Council's parking standards. In addition there are 3 designated visitor spaces within the courtyard for affordable housing units nos. 68-76 and 20 further 'on-street' bays on the southern edge of the site.

The employment element of the proposals involves the erection of a purpose built factory for the Bradford on Avon based company, Antony Best Dynamics, to expand its operations into. It is understood that this is essential in order to retain the business within the town as its existing premises are inadequate and there are no suitable alternative sites within the town. The move will allow the firm to grow from employing 50 staff to approximately 80. The new premises are sited on the northern eastern edge of the application site. The existing factory forms part of the overall application area on the western extremity of the site and it is intended that this will be occupied upon ABD's departure by Mouton Bicycles who currently operate from buildings connected to the adjacent grade I listed The Hall. This will potentially free some further small scale employment floorspace off site.

The new ABD factory building has been described in the submission as "a workshop and a two storey office element within a secure compound. The total proposed floorspace is 3,519m<sup>2</sup>

(gross). The design and detailing is modern and hi-tech, meeting the functional requirements to enable efficient occupation by ABD.” The developers propose that this building shall be practically completed before the occupation of the 50th open market dwelling. A total of 60 car parking spaces are proposed for this element of the scheme.

In addition there is also the proposal of a ‘work-hub’ building on the western half of the employment area. This has been described in the submission as being “designed for occupation by Small-Medium size Enterprises (SMEs) and start-up companies”. The work-hub comprises three linked 3-storey buildings arranged around a central courtyard and a southern single storey element accommodating communal facilities. The proposed work-hub floor space extends to 3,641m<sup>2</sup>. The work-hub would create flexible working space of a B1 use class nature. There is no current end user proposed and this is clearly a speculative element of the application. The developer proposes that phase 1 of the ‘work hub’ development would be practically completed before the first occupation of the 80th open market dwelling. The developer does not propose any end date for the overall completion of the employment offer. A total of 86/87 car parking spaces are proposed for this element.

In addition to the main focus of B1 use the work hub development provides some communal facilities such as a restaurant/cafe, open space and potential for exhibition space by resident firms.

The highway works are largely internal within the site, principally the re-engineering of the existing ‘Springfield’ junction into a roundabout to create access into the residential development. As part of the new western area roundabout there will be a new zebra crossing to allow safe crossing of the Holt Road and use of the existing pedestrian facilities on the north side of Holt Road which leads directly to the town centre and via other safe pedestrian routes links to wider facilities such as the local schools. The works are likely to result in a net loss of on-street parking at this point in the network.

The northern footway on the Holt Road will be widened between the site and town to a width of not less than 1.7 metres to 2 metres, reducing the carriageway to not less than 6 metres. Beyond these improvements the proposal is to contribute financially to the Historic Core Zone works planned by the Council as necessary.

A new junction to the employment area to the eastern side of the application site is proposed from Holt Road. The 30mph speed restriction will be extended to the east toward the cemetery and a central refuge will be provided to allow safe crossing to the existing pedestrian facilities on the north side of Holt Road around the cemetery/allotments.

Allotment development is proposed to the eastern end of the site beyond the employment area and the existing copse of trees (which will be retained as public open space.) The allotments will have access for emergencies or significant bulk deliveries. Users of the allotments will not have vehicular access and as such there is no formal parking provision. The site includes a communal building for allotment users.

In terms of landscaping, broadly speaking the existing trees are being retained on site with minimal tree loss proposed. In addition there are plans for management and supplementary planting to help any development harmonise into its landscape setting and soften the urbanisation of the environment. This includes areas of public open space in the south west corner of the site over the mine, two central areas around existing TPO trees, a modest courtyard near the central flats, semi-private space around the workhub units and informal woodland play areas.

Finally the proposals involve significant drainage operations which involve the removal of surface waters from the existing mains; upgrading the existing pumping station at the Holt Road/Springfield junction and upgrading the discharge through The Hall. This will facilitate space in the infrastructure for foul disposal from the development into the existing sewer. A detailed surface water drainage system has been designed which notably includes a substantial attenuation pond to the far east of the application area which then flows through to the River Avon.

## **6. Planning Policy**

### **West Wiltshire District Plan 1st Alteration (2004) (local plan)**

GB1: Western Wiltshire Green Belt; GB3: Safeguarded Land – Bradford on Avon

C1: Countryside Protection; C4: Landscape Setting; C6a: Landscape Features

C9: Rivers; C15: Archaeological Assessment; C16: Archaeological Investigation and Recording

C17: Conservation Areas; C18: New Development in Conservation Areas

C19: Alterations in Conservation Areas; C30: Skylines; C31a: Design; C32: Landscaping

C33: Recycling; C34a: Resource Consumption and Reduction; C35: Light Pollution

C37: Contaminated Land; C38: Nuisance; H1: Further Housing Development Within Towns

H2: Affordable Housing Within Towns and Villages; H19: Development in Open Countryside

H22: Affordable Housing on Rural Exception Sites; H24: New Housing Design

E6: Rural Employment; T2: Bradford on Avon Bypass; T9: Bus Services; T10: Car Parking

T11: Cycleways; S1: Education; CF10: Cemeteries; U1a: Foul Water Disposal

U2: Surface Water Disposal; I1: Implementation; I2: The Arts; I3: Access for Everyone

Design Guide – Principles Supplementary Planning Guidance (2004)

Residential Design Guide Supplementary Planning Document (2005)

Open Space Provision in New Housing Development: A Guide Supplementary Planning Guidance (2004)

Affordable Housing Supplementary Planning Document (2005)

**West Wiltshire Leisure and Recreation Development Plan Document (2009)**

LP4: Providing recreation facilities in new developments; LP5: New sport and recreation facilities

GM2: Management and maintenance of new or enhanced open space

GM3: Future management partnerships; IS1: Indoor Leisure Centres

**Draft Wiltshire Core Strategy (dWCS)**

CP1: Settlement Strategy; CP2: Delivery Strategy; CP3: Infrastructure Requirements

CP7: Spatial Strategy: Bradford on Avon Community Area

CP35: Existing Employment Sites; CP41: Sustainable Construction and Low-carbon Energy

CP43: Providing Affordable Homes; CP45: Meeting Wiltshire's Housing Need

CP50: Biodiversity and Geodiversity; CP51: Landscape; CP52: Green Infrastructure

CP55: Air Quality; CP57: Ensuring High Quality Design and Place shaping

CP58: Ensuring the conservation of the historic environment; CP60: Sustainable Transport

CP61: Transport and Development; CP62: Development Impacts on the Transport Network

CP64: Demand Management; CP67: Flood Risk; CP68: Water Resources

Appendix A: Development Templates for Strategic Allocations – Land at Kingston Farm, Bradford on Avon

Appendix D: Saved policies and policies replaced (those that would continue to be saved and are relevant are underlined above.)

National Planning Policy Framework (NPPF)

**7. Consultations**

Town/ Parish councils

Bradford on Avon Town Council: Comments on the revised/final submission dated 22/1/2014 were: - permit no objections.

Holt Parish Council: Support.

"We note that the modelling in the Transport Assessment document (7.45) indicates that there will be a relatively small, but nevertheless regrettable, increase in the already excessive levels of traffic passing through the village of Holt on the B3107 at the peak hours.

We also note that there will be a greater increased flow at the dangerous cross roads on the B3107 at Forewoods Common which is located in this Parish. Consideration should be given to improving this junction.”

Wiltshire Council Air Quality Officer - No objection subject to financial contribution.

“We accept the land is ‘allocated land’ within the core strategy, however as stated in my memo of the 20th June 2013 it is not our wish to prevent development or hinder economic activity, however the developer needs to be recognise the extent of the current air quality problem within the town and the potential to impact upon this with their proposed development.”

Financial contribution of £20,000 is sought.

Wiltshire Council Arboricultural Officer - No objection in principle.

Overall the proposals appear reasonable in respect of trees and general landscaping

Wiltshire Council Arts Officer

No objection subject to condition. Regarding provision of public art.

Wiltshire Council Archaeology

No objection subject to condition.

“The proposed development site is of archaeological interest. Geophysical survey and evaluation at the site has revealed the buried remains of prehistoric settlement of Iron Age date. The evaluation suggests that the concentration of the remains appears to be towards the eastern part of the development site, but further features such as a possible Iron Age enclosure, ditches, pits, trackway and field systems appears to be more dispersed across the site and the finds recovered suggest activity from the Iron Age through to the post-medieval period.

The archaeological investigations suggest that the most significant part of the Iron Age settlement survives at the eastern end of the development site, indicated by double and triple ditched features revealed by the geophysical survey and evaluation results. The remains appear to continue into the woodland area and the area which is proposed for allotments.

Due to the significance of the remains my recommendation is that a programme of archaeological investigation, mitigation and recording is undertaken in advance/during construction work at the site, the details of which will need to be discussed with the Wiltshire Council Archaeological Service. This is in line with guidance as set out in the National Planning Policy Framework.”

Wiltshire Council Childcare - No objection subject to financial contribution.

“There is a need for affordable childcare in the Christchurch area of Bradford on Avon. There is one community group in this area and any additional housing will put pressure on numbers in this group. Its accommodation is poor and section 106 money would provide money to move



this group to the school site and increase the number of places to serve the community. The free entitlement grant is a statutory function of the Local Authority and must be fulfilled.”

Financial contribution of £161,530 for affordable childcare is sought.

Wiltshire Council Conservation Officer - No objection in principle.

Wiltshire Council Contaminated Land Officer - No objection subject to conditions.

Wiltshire Council Countryside Team - No objection subject to financial contributions towards enhancements to ‘The Strips’, Barton Farm Country Park, phased towpath improvements and maintenance on the Kennet and Avon Canal.

Financial contributions of £3,051.64 and £14,800 are sought.

Wiltshire Council Drainage Officer - No objection in principle.

Wiltshire Council Ecologist - Following negotiation and discussion and the conclusion of a Habitat Regulations Assessment there is no objection subject to conditions and an informative.

Wiltshire Council Economic Development Officer - No objection.

“I am pleased to see this application come in for an employment led development where a work hub will provide space for new and existing businesses and a new building will allow Antony Best Dynamics to move from its current location adjacent to the new site. Moultons Bicycles will then be able to move into the vacated building which will allow them to expand production in Bradford on Avon. Anthony Best Dynamics, a locally based firm, has grown to become a world leader in the field of dynamics in the automotive industry and Moulton Bicycles is a world leader in the manufacture of iconic bicycles. This development will allow both of these businesses to expand and remain in the town.

The new development will allow businesses to create 300 new jobs and safeguard a further 65 jobs at Moulton’s and Antony Best. This will help to reduce out commuting from the town (an aspiration of the Core Strategy) by providing local jobs to make up some way for the jobs that have been lost in the town due to employment site being converted for residential uses. It is also likely that the construction phase will provide opportunities for local employment and suppliers to be used.

I am very much in support of this development which will provide much needed work space in the town and contribute to the local economy.”

Wiltshire Council Education - No objection subject to financial contribution.

Financial contribution of £470,381 for primary education and £498,030 for secondary education are sought.

Wiltshire Council Energy Officer - No objection subject to conditions

English Heritage - Objection.

“In conclusion, we are of a view that there will be harm to the setting of the Hall, its grounds and the Bradford on Avon Conservation Area and to its unique historic landscape setting. In particular, we would strongly suggest that this proposal does not currently meet the tests of paragraph 131 of the NPPF.”

Environment Agency -No objection subject to conditions and informatives.

Wiltshire Council Highways - No objection subject to conditions, financial contributions and addressing detailed issues.

“The proposal of this identified strategic site will necessarily involve some compromises in relation to normal expectations relating to highway standards for roads serving new major development areas.

The transport assessment submitted in support of the application acknowledges the shortcomings of the local road network, especially in relation to the potential to provide a good standard of footway on Holt Road, or to improve existing routes into the town along Woolley Street and Silver Street.”

Financial contributions of £225,000 for bus service enhancements, £155,000 for Historic Core Zone phase 3, £15,000 for Traffic Regulation Orders and £5,000 for travel plan monitoring are sought.

Wiltshire Council Housing Officer

Comments on final mix:

“As requested, the New Housing Team has reviewed the revised 30% affordable housing mix – as shown on plan ref PP-02C - and can confirm that the mix now proposed does reflect the current demonstrable need for affordable housing in Bradford on Avon - with regard to mix of tenure and size of units on site - the shared ownership units on site to be a mix of 2 and 3 bed houses - and the units have been dispersed throughout the development. The applicant has removed the garages from the affordable housing mix as previously requested. The level of parking now provided for the affordable housing is within an acceptable level. As previously advised, the affordable housing will need to be built to at least the current Homes & Community Agency Design Quality Standards and transferred to a Registered Provider at nil subsidy.”

Wiltshire Council Landscape Officer - No objection

“I was able to take the time to explore the potential vantage points with Justin Thomson (Landscape Architect, MacGregor Smith) from around the town and the local footpaths. We noticed that the site is only visible from a few distant higher points around the town, namely The Tory (NW), Jones Hill (SW) and Windbrook Hill (S) but views are glimpsed and will not change significantly. The ‘conceal and reveal’ nature of the site was particularly evident from The Tory where views were intermittent as one travelled along the footpath. There are localised views from Holt Road, Springfield Road and from the south across the valley.

There will undoubtedly be a change of character from agricultural landscape to a new townscape. Overall there will be a positive new landscape character, a new townscape with a strong sense of place that fits well with the historic character of Bradford on Avon.”

Wiltshire Council Leisure Officer - No objection subject to financial contribution.

Financial contribution of £30,907.03 for sports pitches at Culver Close / Victory Field is sought.

Wiltshire Council Libraries - No objection.

“When we revisited the MLA guidance of £105 per person, it very clearly relates to build and fit-out only, so we feel it is not helpful to a proportionate request for book stock, of the type we have talked about in the Core Strategy/IDP. Attached is a request based on a reasonable provision of 2 books per person, with an assumed occupancy of 2 people per property.”

Financial contribution of £7,126 is sought.

Natural England -No objection.

“Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has undertaken an Appropriate Assessment of the proposal, in accordance with Regulation 61 of the Regulations. Natural England is a statutory consultee on the Appropriate Assessment stage of the Habitats Regulations Assessment (HRA) process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Based on the information provided Natural England is satisfied that the proposals with the safeguards identified within the submitted HRA is unlikely to result in significant effects on the Bath and Bradford on Avon Special Area of Conservation (SAC). This view is based on the appropriate protection and enhancement of the Combe mine and its entrance and the safeguarding of key bat commuting routes.

Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any permission given.”

NHS Wiltshire -No objection.

“The Practice in Bradford on Avon is at capacity and have been reviewing options to increase their capacity. This is likely to involve a significant extension to the existing building in Station Approach.”

Financial contribution of £53,750 is sought.

Wiltshire Council Public Open Space Officer - No objection in principle. Subject to:

\* The Open Space and Play is secured in perpetuity.

\* Further details of the play areas are submitted

\* A contribution of £3,750 is secured for the expansion of Bradford on Avon Cemetery

Royal Society for the Protection of Birds - No objection subject to conditions.

Generally satisfied but raises concern on ensuring open space and SuDS are managed with wildlife in mind, connectivity for wildlife, ensuring that landscaping and ecological plans are interlinked and ensuring that opportunities available to provide biodiversity opportunities are built into the scheme.

Wiltshire Council Spatial Plans - No objection.

“Given the uncertainties around Core Policy 43 in the Wiltshire Core Strategy the 30 per cent offer based on the adopted West Wiltshire District LP Policy H2 is acceptable. I am pleased to see that the developer has agreed to contribute to essential infrastructure items and it is appreciated that a flexible solution can be adopted towards bus service improvements. Contributions to place shaping items such as leisure, air quality improvements and open space will certainly be positively received locally. Overall this strategic development will contribute to housing and most importantly employment delivery at Bradford on Avon. The retention and expansion of ABD and Moulton Bicycles, and the delivery of a work hub for start up businesses will contribute to achieve the vision for Bradford on Avon as expressed in the Core Strategy. Therefore I fully support the latest proposal.”

Wiltshire Council Urban Designer - No objection subject to amendments.

“The residential element of this scheme is focused on high quality pastiche design. This is a result of local opinion and is intended to link the scheme with the historic town centre. The decision to mimic the historic town is understood, but it represents a missed opportunity to create a development with its own distinctive character, and takes away from the distinctiveness and value of the historic centre.

Overall there is a good housing mix in terms of size of units as well as the scale and appearance of buildings. The arrangement and detailed design of the buildings has taken account of long views of the site and its relationship to the existing town and the use of chimneys is welcomed as these are important features in the current skyline.

In general it is felt that the arrangement of buildings takes account of the sites constraints and good design principles and will result in quality spaces and streets. Nevertheless, there are some areas where the arrangement of parking and rear courtyards could be improved through minor alterations which would result in considerable benefit for the overall development:

AB Building – modern and crisp, the design of this building seeks to make a statement whilst minimising the visual impact of the scale of the building by focusing on the western wing and the building entrance. The design concept for this building is strongly supported.

Work Hub Complex – The rationale behind the design of this building is incongruous as the buildings have no agricultural references. Their design has more in common with a Victorian

mill. In addition there is certainly very little of the external appearance that can be referred to as contemporary.

Wessex Water No objection subject to condition.

“Wessex Water has been instructed by the applicant’s consultants to undertake foul network modelling to appraise the capacity of the existing foul sewerage network to accommodate predicted foul flow from the proposal. The Flood Risk Assessment and Drainage Strategy (WB01513/R3/FRA February 2013) reflects appraisal works undertaken so far and describes the capacity improvements recommended to mitigate against the development flows thus reducing the risk of downstream flooding and pollution.”

Wessex Water have yet to fully agree these works formally and in detail so recommend a condition to require a foul and surface water drainage strategy and its implementation once agreed.

Wiltshire and Swindon Biological Records Centre - No objection.

Noted, 5 bat species and hedgehog recorded within application site boundary (1977-1983). Multiple records associated which may be pertinent.

Wiltshire Fire and Rescue Service - No objection.

Generic advice provided on building regulations, improvements in the event of a fire and the need for financial support.

Financial contribution of £11,204.67 is sought.

## **8. Publicity**

The application was advertised by site notice, press notice and neighbour notification.

Twenty four representations received with a mix of support, concern, and largely objection.

Summary of points raised which include representations from the Bradford on Avon Preservation Trust (object) and the Bradford on Avon Climate Friendly Group:

- \* Application is premature.
- \* Housing development in Bradford should be phased towards the end of the Plan period, that is towards 2026.
- \* The Town must have some time to absorb extra housing (Kingston Mills etc.) before yet more is provided.
- \* Time is required to consider measures to alleviate the considerable impact of increased traffic generated by the development.
- \* Air pollution problems exacerbated.

- \* Need plans to divert traffic away from bridge bottleneck
- \* Missed opportunity to provide off-street public parking on the North side of the river.
- \* Suggest public parking as provided above the mine.
- \* Holt Road is far too narrow to accommodate the traffic, both private and commercial.
- \* A direct pedestrian route between the site and the Town Centre, through the present Anthony Best site and the along the river to the Bridge, could alleviate some problems, at least for pedestrians.
- \* Concerned to ensure development protects and enhances wildlife opportunities including for swifts, starlings and house sparrows.
- \* Pedestrian safety on Holt Road is a concern.
- \* Exacerbate existing congestion.
- \* No need for housing now as other developments sites are on-going and not yet sold.
- \* Employment site would not create new employment and businesses are just moving.
- \* Potential impact on local business
- \* Wiltshire highways have stated a presumption against development in Bradford on Avon.
- \* Scheme has attractive features.
- \* Fails to comply with the environmental dimension of sustainability
- \* Falls short on the economic dimension of sustainability
- \* Loss of existing on-street parking
- \* Inadequate parking provision within site
- \* Likely to attract more inward commuting with employment generation
- \* Likely to attract more out commuting with 138 new homes
- \* Allowing development early in the plan period will increase pressure for development north of Holt Road and on the golf course
- \* Need to have a safe off road route to town centre through Kingston Mills
- \* Holt Road adjacent to the development site must be widened.
- \* exacerbate congestion parking and pollution problems
- \* Visual intrusion and light spillage - a screen is required

- \* footbridge to access Fitzmaurice school required
- \* Will create and exacerbate 'rat-runs' including through Cemetery Lane and Woolley Terrace.
- \* Will jeopardise any potential to re-route traffic around and out of the town.
- \* HGVs continue to use the town as a route which is not properly policed or enforced.
- \* Employment designs are poor quality and site uncomfortably next to the Poundbury pastiche.
- \* Concern over impact on archaeology.
- \* Schools do not have capacity for more children.
- \* Create air quality issue on Springfield and New Road – residential streets not a by-pass
- \* Do people in Holt know about this? Traffic will go through there.
- \* Job numbers quoted are unrealistic and at best maximum numbers.
- \* Appear to be buying the permission by paying for town centre improvements
- \* While this is pending the Council are not controlling illegal parking on Springfield and New Road
- \* Getting the solar PV development has made this land brownfield which is very sneaky of the developers / how has this become brownfield land
- \* The cemetery is full and they are not providing land to extend it.
- \* Why was the Avon factory demolished for housing only now to build factories on fields.
- \* we should be preserving green spaces
- \* inadequate consultation
- \* prompts the Core Strategy conclusion
- \* opens up potential for further development if granted prior to Core Strategy adoption.
- \* layout and design is good
- \* cycle parking put in place in employment areas
- \* employment architecture too imposing
- \* transport assessment and modelling underplays the level of traffic existing in the town.
- \* Holt Road speed limit should be reduced to 20mph
- \* Holt Road needs to be improved to address rat run problems

- \* Detail of construction traffic management plan critical
- \* Residential development is much too early in the plan period needs to be closer to 2026.
- \* ABD buildings design is ugly
- \* green credential of the development are massively over stated
- \* Fencing around ABD of 2.2 metres is excessive
- \* main open space through the site is severed by a road.
- \* Space should be retained for a by-pass
- \* Should permanently close Cemetery Lane
- \* Traffic calming on Holt Road required
- \* Vehemently opposite Redcliffe Homes development as an alternative
- \* Experimental closure of Cemetery Lane should occur before any development is considered
- \* traffic calming in place on potential rat runs to discourage traffic
- \* roundabout needs to have planting akin to the existing extensive bulbs and two trees

## **9. Planning Considerations**

### **9.1 Principle of development.**

The application site is shown within the local plan under policy GB3 as “safeguarded” land set aside from the Western Wiltshire Green Belt to meet the longer term needs of Bradford on Avon beyond 2011 and therefore into the next plan period. It is a green field site. Other land within this classification is to the north of Holt Road and to the south of the River Avon. However the site is largely outside of the defined town policy limits in the Local plan where development would be acceptable in principle.

As members will be aware, although well advanced, the Wiltshire Core Strategy that will replace the Local plan has not reached formal adoption and therefore cannot be afforded full weight. However, the draft Wiltshire Core Strategy (dWCS) promotes this site for a mixed use development of circa 150 houses and 2-3 hectares of employment land as the only strategic development in Bradford on Avon. This is set out under the development templates of Appendix A to the dWCS. The template states that infrastructure requirements may change and that flexibility should be had. The dWCS proposes to continue to save policy GB3 which safeguards the application site and other land from the Green Belt for the future development needs of the town.

As such it is considered that the principle of a mixed use scheme of housing and employment is one that has been anticipated on this site, with the evidence base currently showing a need for



further housing and employment within the town to meet local need and help reverse out-commuting trends; and the NPPF's clear message of needing to support sustainable development.

## **9.2 Viability and affordable housing**

The application was submitted to Wiltshire Council in the early summer of 2013 after pre-application discussions and developer-led public consultation work. One key area of discussion has been the viability of the scheme to provide the dWCS criterion (CP43) of 40% affordable housing, other planning obligations and infrastructure requirements such as drainage and highway works. The application was submitted with an offer for 20% affordable housing, other planning obligations up to circa £1.3m and infrastructure requirements on drainage and highways. Since submission, feedback on the dWCS has been provided by the Planning Inspector to indicate that the 40% affordable housing requirement may not be evidence based. In light of that, further negotiation has facilitated an improved offer from the developer to provide 30% affordable housing to match the percentage that would be sought on a large scale residential development within the adjacent Bradford on Avon town policy limits. The developer continues to offer all the infrastructure improvements and they have increased their offer on planning obligations to be circa £1.4m.

A further factor to the viability of this scheme is the fact that a significant proportion of the employment offer has a defined end user and has been designed bespoke for the firm's purposes. The proposed new Antony Best Dynamics (ABD) factory would see the retention of 50 jobs within Bradford on Avon and the creation of up to 30 new jobs. It also means that the emerging plan's aim of creating mixed use development to meet housing need, improve employment offer and reduce out-commuting trends is more realistic than it would be if this were a proposal that is entirely speculative. It has been made clear that ABD needs its new factory and if it cannot be realised imminently within the town then there is a significant risk that they may move away from the area.

It is considered that the current proposed level of affordable housing and planning obligations meet the statutory tests, are fairly and reasonably related to the development and should enable delivery of a viable scheme.

With regard to the detail of the affordable housing offer, there is a good mix of accommodation from 1 to 3 bedroom units. All affordable units are provided with allocated parking, with some visitor parking provided for. The overall parking levels have been agreed with highway officers.

The affordable housing is clustered throughout the site allowing for a better social integration whilst ensuring ease of management and maintenance for the registered social landlord. The affordable housing can be retained in perpetuity subject to a legal agreement.

## **9.3 Planning Obligations.**

This has been an area of considerable negotiation. The contributions that have been secured have been based on the requirements of the extant local plan policies (with particular note given to any that are to be saved by the dWCS) and the subsequent development template for the site

in the dWCS. They have been assessed against the statutory test to ensure that they are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. They include:

**Education:** A sum of £498,030 has been agreed toward secondary school places based on the current cost multipliers and would be index linked.

A sum of £470,381 has been agreed toward primary school places based on the current cost multipliers and would be index linked.

**Child care provision:** A sum of £161,530 toward affordable child care has been agreed. This is a request that stems from the development template and would go towards funding the free nursery places that were formally funded by central government and are now at the cost of local government.

**GP surgeries:** Following consultation with NHS Wiltshire a sum of £53,750 has been agreed. Again this request has stemmed from the development template for the site.

**Traffic Regulation Orders:** The highway consultation set out a request for £15,000 has been agreed. This is on the basis that “there is currently no weight restriction on Holt Road/Woolley Street. Whilst the prospect of a weight limit has been aired in pre-application consultations, it is not intended that restrictions be imposed on the route without an opportunity to monitor development impacts; a contingency will be sought by way of a planning obligation to promote and make a traffic regulation order in the event the development increases town centre lorry movements via Woolley Street”.

**Travel Plan Monitoring:** A sum of £5,000 has been agreed as a contribution to travel plan monitoring. Again this is a development template requirement and identified as ‘essential’ in order to facilitate the development. This will help with encouraging sustainable travel behaviour.

**Historic Core Zone:** A sum of £155,000 towards phase 3 of Bradford on Avon’s Historic Core Zone project has been agreed, which would see improvements made to the public realm and transport within the town. This is an initiative that started in 2009 and it stems from a “priority for people” project. Phase 3 of the project includes works to Silver Street

**Leisure:** A sum of £30,907.03 has been agreed as an off-site contribution to be used at Culver Close / Victory Field recreation ground. This is in accordance with the development template for the site and the Leisure and Recreation DPD.

**Air Quality:** A sum of £20,000 has been agreed in order to help mitigate any potential impact on air quality problems within the air quality management area that covers Bradford on Avon’s town centre including Silver Street. The money would be used toward “current air quality projects that are contained within the emerging draft air quality action plan and the community air quality action plan for Wiltshire. These include:

\* A text alert system, linked to the automatic air quality monitoring analysers which will alert people with respiratory health issues of poor air quality

\* A stand alone air quality website giving the public access to real time air quality monitoring data in their area

\* Upgrading the automatic monitoring equipment to enable remote access to data via the stand alone website

\* Ecopurer paint to be applied to surfaces in Masons Lane to try and reduce levels of nitrogen dioxide (a community lead initiative and pilot study)".

Although this is not a part of the development template for the site, issues of air quality have been identified as 'place-shaping' infrastructure within the emerging Infrastructure Delivery Plan (IDP).

**Cemetery Expansion:** In addition to the on-site public open space requirements that can be secured through legal agreement there is a requirement being raised for a financial contribution to cemetery expansion plans. The sum agreed is £3,750. This is an issue identified in the development template and issues with cemetery expansion in Bradford on Avon have been problematic for many years.

Not every request can either be accommodated (not justifiable in terms of the statutory tests; or not highlighted in either the development plan or the development template for the site in the DWCS and to go further would also bring the viability of the scheme into serious question.

The proposal is considered to be acceptable in terms of the planning obligations agreed.

#### **9.4 Sustainable development – Economic, Social, Environmental.**

The development is considered to represent sustainable development within the meaning of the NPPF. The proposals will generate an economic benefit through the development itself which will generate construction associated employment over the delivery of the scheme which is expected to be circa 5 years. Furthermore the proposals will create new employment space for the town which will help reverse the out-commuting trends that the town experiences. The proposals will create bespoke new space for local business ABD allowing them to expand their operations so that 50 jobs are retained in the town and approximately 30 new jobs are created through expansion. This is a business with research and development (R&D) and as such especially important to the local economy over and above low skilled employment opportunities. This development would occur in tandem with the housing as the developer has offered to practically complete the ABD factory before the occupation of the 50th open market dwelling.

The established Moulton Bicycles will then be able to expand its own operations by moving into the old and renovated ABD factory, therefore again retaining and generating employment in the town. Moulton Bicycles employ around 17 full-time equivalent staff and it is estimated that this could double; furthermore they have a heritage within the town.

Furthermore there is the speculative element of the employment proposals with the phased building of the 'work-hub'. Whilst this is speculative the developer has offered to commit to practically completing phase 1 of the work-hub before the occupation of the 80th open market dwelling. The work hub building will offer a flexible employment floor space for small-medium sized enterprises and start-up business with communal facilities. It is estimated that when complete this would generate circa 200-250 full-time equivalent jobs. This will significantly help address the loss of employment floorspace that has occurred in the town, arguably because existing premises are historic and have associated problems with cost, access and management making them less desirable to business, especially in difficult economic conditions.

The Council's economic development team support the proposals.

Socially the proposals will see the creation of employment opportunities and also the provision of further housing, including affordable housing, that is evidently needed in the town. The mix of tenure and housing types is varied which will help serve a range of needs that exist in the town. This would provide 41 affordable units to help meet housing need ranging from 1 bedroom to 3 bedroom units.

Environmentally the scheme is also considered to be sustainable. The proposals form part of what was originally planned to be a much larger scheme with a 5MW solar PV farm. That part of the scheme, due to government subsidy changes came forward in advance of the housing and employment and has been completed and is up and running generating energy which has been hard wired to the existing ABD factory, whilst the majority of the energy is passed on to the grid. The commercial elements of the scheme are proposed to be linked into the solar PV scheme in the future and the developer's claim is that the energy use from the proposals is likely to be less than 55% of the adjacent solar PV output. The submitted energy statement states that "the total regulated energy requirement of the Kingston Farm development (residential plus commercial buildings) is equivalent to about 61% of the estimated annual zero carbon electricity yield from the Kingston Farm PV array." Whilst the two scheme's have become stand alone projects in the development management process it is clear that the overall Kingston Farm development has significant environmental credentials.

Furthermore the ABD building has been designed to be BREEAM 'very good' standard; the roof materials to the work-hub are BREEAM 'very good' whilst incorporating green walls into the proposals.

The submitted energy statement sets out a strategy with the residential proposals to be built on "fabric first principles" meaning that they will have low energy requirements and be well insulated. They will have high energy efficiency gas central heating boilers as the submission indicates this is actually preferable in carbon terms over other options such as air-source heat pumps.

The drainage works for the site include upgrading the existing pumping station and creating capacity in the system for further foul waters by removing surface waters from the existing combined sewers. This has environmental benefits by avoiding the need to treat surface waters

with foul waste. The engineering solutions are to the satisfaction of the Environment Agency and Wessex Water and in principle the Council's drainage officers without increased risk of flooding.

Turning to ecology, it is noted that after negotiation the Council's ecologist raises no objection and indeed the drainage and landscaping solutions to the site offer opportunity to enhance biodiversity.

The location of the development is also important in sustainability terms. Bradford on Avon is heavily constrained encircled by Green Belt and as such the options for expansion of the town are very limited. The eastern side of town is considered to be a sustainable location with good accessibility, including by foot. The town benefits from a good rail service which can be realistically reached on foot from the development site. The town offers facilities to cover day-to-day requirements and as such it is considered to be a sustainable location and whilst future residents and employees on the site will be likely to use a private car, there are realistic alternatives depending on the life style choices of the people. The proposals have been made with the offer of travel plan work and monitoring, revising bus stop locations and improving pedestrian facilities for access to local schools and the town. All of which will contribute to people making more sustainable travel choices. In short this is considered to be a sustainable development in economic, social and environmental terms.

## **9.5 Urban Design.**

The application has been subject to detailed pre-application discussion and public consultation. The site is not well related to any existing pattern or grain of development and it has been identified that the site has opportunity for creating its own spatial character and form. The developer's public engagement has revealed a local desire to have a traditional approach that reflects the traditional form of development in Bradford on Avon.

In light of the urban design and conservation officer comments, mindful of the viability concerns with the project, some minor alterations to the scheme have been sought. Notably as a result there has been a strategic increase in the level of natural stone that is so characteristic of Bradford on Avon.

The elevation treatments of the buildings are considered to be varied and interesting aided by the good mix of housing types and sizes. The street layouts are in blocks with a mix of curved and linear street layouts which aid permeability and visual interest. The site benefits from good natural surveillance, especially where flats over garages have been employed in the more backland areas of the site.

The proposals are considered to represent a good density and efficient use of land given the site constraints of TPO trees, requirements for on-site public open space and the mines to the south west corner of the site. So although below the development template's indicative target of 150 dwellings the proposals are considered to be reasonable.

The proposals have an acceptable level of car parking. The proposals are not overly dominated by allocated car parking and where car park courtyards have been employed there is indicative

planting illustrated to soften the appearance of such areas. The streets have been designed to allow for on-street parking without causing obstruction to the network.

The proposals have clustered the employment to the north east corner of the site which means that from approaches to the town from the east (Holt) these commercial buildings will be significant features upon entry to the town. The design of the ABD factory has attracted no objection from the Council's urban design officer and although very contemporary in nature is considered to be well designed. The existing copse of trees immediately to the east of the building will be managed and maintained and will help the building to harmonise into its setting with additional strategic landscaping. This can be achieved and secured by condition; it need not hide the development rather help it to assimilate into the landscape. The larger work-hub building has taken an entirely different design approach in its formation. This is a building that is considered to reflect some architectural features of traditional agricultural buildings and indeed industrial buildings in the area but with a contemporary slant. The design is considered to be acceptable and would cause no demonstrable harm.

In terms of access to the site, the proposals necessarily involve a substantial revision to the Holt Road/Springfield 3-way junction. This is already a heavily engineered road layout which has been softened with landscaping in order to avoid a significant impact on the adjacent heritage assets of a conservation area, listed park and garden, setting of listed buildings and historic setting of the town. Although English Heritage has raised concern it is considered that the roundabout proposals are a necessary highway safety feature and with appropriate hard and soft landscaping that could be secured by condition then there is no demonstrable harm to be caused.

The access to the employment area further to the east will become part of a new 'gateway' to Bradford on Avon's fringe and has been designed in an attractive manner whilst meeting the safety requirements of the highway.

## **9.6 Landscape and Setting.**

The proposals are relatively self-contained and do not relate directly with any existing character area of Bradford on Avon. However this safeguarded land is within the historic setting of the Bradford on Avon designation under the local plan. This is a heritage asset and needs to be protected whilst acknowledging the need to expand the town to meet its economic and housing needs.

The Council's conservation officer raises no objection to the proposals and whilst there has been concern raised by English Heritage it is considered that the inevitable change in character from arable farming to a suburban environment has been designed in a manner sensitive to the historic setting of the town.

The Council's landscape officer has assessed the proposals in light of the submitted landscape and visual impact assessment and has raised no objection concluding that "overall there will be a positive new landscape character, a new townscape with a strong sense of place that fits well with the historic character of Bradford on Avon."The submitted Landscape and Visual impact

Assessment details a post construction affect from the development with a 'slight adverse impact' with 'limited significance' in this context. It has been noted that the main distant views of the site will be from the opposite side of the Rover Avon valley and the layout of the development has addressed this with varied and interesting curved street scene presenting itself to those views. Rising above this naturally with the topography will be further housing development and then the rear sides of the employment development.

Whilst it may have been more natural to have the bulk of development to the western end of the site and to regress the scale and density down toward the eastern side and open countryside, an alternative approach has been taken in acknowledgement of the constraints to the west including sensitivity of the heritage assets. The result is a buffer that will be created between the Grade II listed park and garden, conservation area and the setting of listed buildings including the Grade I listed The Hall.

The existing landscaping around the listed park and garden, the copse of trees along the southern boundary of the western half of the site, the TPO planes on the northern boundary, the retained TPO field trees within the centre of the site and the retained copse to the eastern end of the site will all help the scheme to assimilate into the landscape. There is some relatively limited requirement for further landscaping works as set out in the submitted details.

The development template indicates that along the Holt Road development should be limited to 2-storey height to protect the skyline. With the exception of the work hub facility this has been adhered to and it is considered on balance that the need to provide a greater floorplate of employment with an additional floor outweighs any harm. This is because the it has only been possible to allocate around 1 hectare for employment. As such increasing density is necessary and justifiable.

## **9.7 Trees.**

The proposals detail the felling of circa 20 trees, however there will be a net increase in trees with the landscape proposals implemented. Most critically it is necessary to remove a limited number of trees subject to TPO in order to facilitate the access to the site. One of the TPO field specimens requires removal for good arboricultural practice and will be replaced. It is not considered that the impact will be very significant in the context of those TPO trees retained along Holt Road and the replacement landscaping which is greater in tree number than existing. The submitted arboricultural assessment justifies the works and details the need for wider management of the existing trees and copses in the site. The submission concludes that there would be no significant post construction pressure on trees. Despite this conclusion the Council's arboricultural officer has raised some slight concern with potential pressure post construction. In particular concern was raised with parking spaces being located below the canopy of TPO trees. As a result the scheme has been revised to limited the number of parking spaces affected to no more than 4 spaces connected with only 2 dwelling units.

## **9.8 Open Space.**

The application has been submitted with a combined amount of open space, including the woodland copse, allotments, and strategic landscaping, extending to approximately 2.3ha, of which 1.5ha is within the main development site and 1ha of which is designed for public open space. The open space provision has been designed to create multi-functional green infrastructure in accordance with the development template for the site. There is an emphasis on formal and informal play, biodiversity, connectivity and place-shaping through the open space strategy.

Approximately 1 ha of the open space will be designated as public open space designed for access, children's play and as wildlife habitats. This will be managed by a management company or a commuted sum will be paid to the Council as part of any land transfer. There is an area over the mine in the south west corner; two areas within the centre of the site where there are existing field trees subject to TPO (the northern one will be where a formal 'junior play zone' will be provided); a strip along the south of the site and the woodland area to the east of the site (where a formal 'woodland play space' will be created including a piece of play equipment).

In addition the allotments form a separate area of over half a hectare and will be managed as a private facility. This is not offered for transfer to the Council or for retention in perpetuity through the application.

There are additional areas of informal play and green infrastructure throughout the site which will be landscaped.

The development template for the site in the dWCS identifies the need to explore the retention of land to the south, between the development and the railway line, for public open space. Whilst it has been retained as open agricultural land and forms part of the landscaping strategy it is clear from indicative fencing details that it will not be publicly accessible at this time. It is understood this area will be retained for the private enjoyment of the current land owner and it is noted that there is an agricultural access indicated (on landscaping and drainage drawings) from the development site onto this land adjacent to the new pumping station. This will be utilised to gain access to the new attenuation pond for any maintenance purposes.

The Council's Open Space officer has raised no objection to the proposals highlighting a requirement for 0.83ha of Public Open Space (PoS) of which 160sqm should be equipped. They also detail the preference to see the PoS transferred to the Council for management. These requirements have been met. Additional points have been raised but these can be covered by condition.

## **9.9 Heritage assets including Conservation Area, setting of Grade II historic park and garden and setting of listed buildings including Grade I The Hall.**

The vast majority of the site is located outside of any designated conservation area, listed park or garden or indeed listed building. As such it is generally the setting of these heritage assets that is a consideration. A further heritage asset is the historic setting of Bradford on Avon under local plan policy C4.



As already detailed regrettably English Heritage have raised objection to the proposals. They have stated that they are “concerned about the visual impact of any development in this landscape”. They point to the heavily engineered access and views from positions such as the Tory in particular as concerns. However the Council’s conservation officer has raised no objection and nor indeed have the Council’s landscape officer who acknowledges that from some higher points in the town the site can be seen such as The Tory, but “views are glimpsed and will not change significantly”. A full site inspection from within the site, from adjacent public and private vantage points and wider vantage points such as The Tory and the rights of way on the opposite side of the River Avon valley has been carried out by officers and it is considered that any harm to heritage assets is relatively modest and outweighed by the potential for hard and soft landscape mitigation and the overall benefits of the scheme. English Heritage seem to be concerned with the principle of development at all, however it must be accepted that this site has been safeguarded for future development needs for a number of years within adopted local plan policy in addition to the emerging detailed proposals within the dWCS.

As such it is concluded that the impact on the conservation area, grade II listed park and garden, setting of various listed buildings ranging from Grade I to Grade II listing and also the setting of the town itself are acceptable within the overall context of the proposals and subject to conditions. Your officers conclude that the proposals do accord with paragraph 131 of the NPPF contrary to the English Heritage advice.

#### **9.10 Archaeology.**

The Council’s archaeologist has highlighted that the site is of archaeological interest (a further heritage asset) and it is known from the solar PV scheme that there are potential for remains in the vicinity. The submitted Geophysical survey and evaluation has confirmed that there are remains of an Iron Age settlement concentrated to the eastern part of the site, although other features are also dispersed through the site.

The archaeological submission suggest that the most significant part of the Iron Age settlement survives at the eastern end of the development site, indicated by double and triple ditched features revealed by the geophysical survey and evaluation results. The remains appear to continue into the woodland area and the area which is proposed for allotments.

Generally the Council’s archaeologist has been satisfied that subject to a programme of archaeological investigation (which can be secured by condition) then they have no objection. However they were concerned with a paucity of evaluation in the woodland play and allotment areas. The Council’s archaeologist has stated that this area contain(s) a late Bronze Age-Early Iron Age multivallate settlement site of high significance. In light of this further discussion and negotiation has taken place and a mitigation/method statement submitted at the request of the Council’s archaeologist. This covers work in the woodland and allotments area to avoid disturbance of the ground below 250-300mm by means such as raft foundations to the allotment building, importation of 300-400mm of topsoil, banning of ‘double-digging’ by allotment holders, using no dig specifications to pathways, and ensuring a watching brief for excavations below 250mm. This can be controlled by condition.

## **9.11 Highways.**

Vehicular, cycle and pedestrian access to the site is to be obtained from 2 new access points. At the western end by creation of a roundabout at the existing Holt Road/Springfield junction. Furthermore at this point there are highway works proposed to improve the pedestrian path on the north of Holt Road and create a new pedestrian crossing to the west of the roundabout to allow safe crossing. This will narrow the vehicular carriageway. Beyond this there is a financial contribution to planned Historic Core Zone works offered by the developer.

To the eastern end of the site there is a new access for the employment area and associated modifications to the highway including a island refuge to aid crossing from the path on the north side of Holt Road to the allotments and cemetery. The allotments and cemetery will also be accessible from the arguably more preferable route of travel through the development site itself.

There is no access to the allotments by vehicle save for an emergency access/bulk delivery access. For the avoidance of doubt this should be conditioned. This means that parking for allotment users is limited to on-street within the development or potentially at evenings and weekends there could be an element of shared use with parts of the employment site. The later is acceptable to highways and could be controlled by condition.

The site has a total of approximately 289 spaces including 20 designated on street bays for 138 dwellings.

The site has a total of approximately 146 spaces for the employment element, 60 of which are allocated to the ABD factory which has bespoke requirements.

Furthermore the proposals do not include the improved pedestrian and cycle facilities from the south of the site linking to the town centre via The Hall estate and/or Kingston Mills as envisaged with the original development template for the site. The original template critically stated that such links must avoid the Holt Road but this has been amended in recent months in acknowledgement that alternatives are not viable except for the stretch that adjoins the development site. Early in the discussions this proved to be unviable, a particular concern being land ownership complications but also the potential impact of opening up sensitive heritage assets of the Grade II listed park and garden and the Grade I listed The Hall to easy public access. The improvements on the Holt Road and Silver Street are the best compromise in-lieu of this.

The highway officer has highlighted that “Bradford on Avon is acknowledged to be subject to peak period traffic delays. The Transport Assessment submitted in support of this application demonstrates that there will be a further, but not material effect on the most difficult roads in the town, making acceptable assumptions in relation to the distribution/ of trips on the network. No highways objection is made in relation to impact remote from the site because actual changes to the operation of the network will not result in severe transport impacts, and because the site is the chosen strategic housing site in the dWCS.”

During the construction phase there is some potential for disruption and so a construction management plan is necessary by condition. Lorry movements are a potential concern as there

is currently no weight restriction on Holt Road/Woolley Street. The highway officer has stated that “a contingency will be sought by way of a planning obligation to promote and make a traffic regulation order in the event the development increases town centre lorry movements via Woolley Street. The developer will be required to contribute a sum towards monitoring and order making/implementation, if required”.

Finally it has been noted that the proposals do detail cycle storage for those residents in flats which will help encourage sustainable travel choices.

### **9.12 Air Quality.**

The site will result in an increase of traffic onto the highway network and it is likely that a number of trips will inevitably occur through the congested town centre which has existing air quality issues. As such it has been designated as an Air Quality Management Area (AQMA) since 2001. CP55 of the dWCS details that development proposals that are likely to exacerbate existing areas of poor air quality will need to effectively mitigate any impacts.

The application submission includes an Air Quality Assessment which details that there will be a “minor adverse” impact as a result of the development and goes on to detail mitigation measures such as travel plans and highway improvements. These have been offered as part of the submission and in addition to that, following consultation with the Council’s air quality officers a financial contribution of £20,000 has been agreed to further monitor and mitigate against traffic impacts on the air quality in the AQMA.

### **9.13 Residential amenity.**

The proposed development would not cause overlooking or a dominant or overbearing impact on any existing property as this site is self contained and separated from other residential property. The outlook of houses opposite on the Holt Road may have their outlooks affected although the existing tree screening will be retained and protected.

The proposals do not fully detail a lighting scheme however this can be controlled by condition to avoid light pollution, nuisance and indeed potential ecological impacts for species such as bats.

### **9.14 Ecology.**

The proposals have been submitted with an ecological assessment, a bat survey, reptile survey, badger report and an assessment of the impact on the adjacent Combe Mine County Wildlife Site (CWS) and the Bath and Bradford Special Area of Conservation (SAC). The mine is known to be home to bats. No objection is now raised from Natural England or the Council’s ecologist subject to appropriate conditions.

The development proposals may also provide significant opportunity to provide ecological enhancement with the Sustainable urban drainage scheme, additional tree planting, providing a long-term ecological management plan for the site, changing agricultural practices (to suit bat foraging) on the remaining farm land which will not be suitable for arable farming and so will be

grazed by cattle, and management of the site's landscaping. These enhancements can also be controlled by condition.

### **9.15 Drainage.**

The application has been submitted with a Flood Risk Assessment (FRA) and Drainage Statement. The application site is all designated as Flood Zone 1, the lowest probability of fluvial flooding.

The foul and surface water drainage proposals are understood to have been subject to pre-application discussion with Wessex Water, the Environment Agency and Wiltshire Council's drainage officers and the principle of the foul and surface water drainage solutions agreed.

The foul drainage solution increases foul drainage capacity in an existing combined sewer by extracting surface water flows. The submitted planning statement summarises that "the proposals include provision of upgraded foul drainage infrastructure. Additional foul storage capacity has been achieved by diverting surface water from an existing combined sewer through a repaired culvert in Springfield Road and a replacement culvert through The Hall grounds. An additional storage tank is also proposed at the junction of Holt Road/Springfield to provide further additional capacity for the existing Springfield pumping station." On-site foul drainage drains to a new purpose built storage tank and pump station on the southern edge of the site and would then be pumped to the existing upgraded Springfield pump. Details of this facility should be controlled by condition.

Surface water disposal from the development will largely be to the River Avon via an existing watercourse that is already culverted under the railway tracks. This is to the eastern end of the solar PV farm. In order for water to reach this area and in order to aid water attenuation from the urbanising of the environment there will be subterranean storage within the employment area, a network of surface water pipes and an open water course through a 'living water environment' running from the main development area east to newly engineered attenuation pond.

The submission details the predicted routes of storm events which indicate exceedance flows into the upgraded Springfield culvert and into the retained permeable land to the south of the application site.

The application has been subject to consultations with the Environment Agency, Wessex Water and the Council's drainage officers. No objection has been raised in principle although a condition requiring final details and actual implementation is recommended in light of the expert consultation responses.

In light of the information submitted and the consultation responses it is considered that the proposals are in that they can be adequately serviced, do not pose a significant flood risk and any impacts of urbanisation can be adequately mitigated for through the proposed engineering solutions.

## **9.16 Green Belt**

The vast majority of the proposals are outside of the Green Belt, however the woodland copse to the east of the main development area, the allotments and the SuDS for the development are all located within the designated Green Belt. There is no relevant local plan policy on Green Belt as GB2 was not saved. Indeed the dWCS does not have a particular policy on the matter stating in the supporting text of CP51 that any decision will be made in accordance with national policy on the Green Belt.

The NPPF details that inappropriate development is by definition harmful and should not be approved except in very special circumstances. It goes on to detail that new buildings are inappropriate including some exceptions such as buildings for agriculture and outdoor recreation. These exceptions would include the proposed structures connected to the woodland play area and the allotments. Furthermore the openness at these points would be preserved by the development with the added benefit of making use of land that cannot be reasonably farmed at a commercial level due to the solar PV farm development isolating them from any other holding.

## **9.17 Land contamination.**

To the south west corner of the site is a disused mine. Given the site's proximity to this and the residential nature of development conditions have been recommended by the Council's contaminated land officer to address potential contamination and ground gases.

The submitted geoenvironmental investigation highlights these as potential areas of concern although it identifies the risk as being "low".

In light of the expert advice conditions are recommended.

## **10. Summary and conclusions**

The proposal is sited on land safeguarded for the longer term development needs of the town (post 2011) in the development plan. It is a proposed strategic allocation in the draft Wiltshire Core Strategy. Whilst it would have been preferable if the site had been brought forward once the Core Strategy had been adopted, it is clear that adoption is still some way off, and the employment needs of the local firms involved in the proposal cannot be put on hold indefinitely.

The policy in the NPPF is that planning permission should be granted in situations where sustainable development is proposed and there are no adverse impacts that would significantly and demonstrably outweigh the benefits. In this case, it is considered that the social, economic and environmental benefits of bringing the site forward justify the favourable consideration of this application. The proposals offer a considerable amount of the requirements and stipulations detailed in the draft development template for this strategic site.

There were 4 key objectives set out including the delivery of upto 150 houses and 2-3 hectares of employment land to improve self-containment; a high quality, sustainable and mixed use development with 40% affordable housing; an exemplar for sustainable and renewable energy

development to meet carbon neutral standards; and facilitate the retention and expansion of two employers. The general thrusts of the objectives have been met by this proposal.

Therefore it is recommended that planning permission be granted subject to a legal agreement to secure the package of planning gains being offered by the developer along with reasonable and necessary planning conditions to control the development.

**Recommendation:**

**To delegate authority to the Area Development Manager to grant planning permission subject to a legal agreement to secure the following:**

**i) 30% Affordable Housing to be provided on site.**

**ii) a financial contribution towards the provision of secondary school places totalling £498,030 which would be index linked;**

**iii) a financial contribution towards the provision of primary school places totalling £470,381 which would be index linked;**

**iv) a financial contribution towards the provision of affordable childcare totalling £161,530 which would be indexed linked;**

**v) a financial contribution towards the provision of GP surgery facilities totalling £53,750 which would be indexed linked;**

**vi) a financial contribution towards Phase 3 of the Bradford on Avon Historic Core Zone works totalling £155,000 which would be indexed linked (in the event that this works does not occur monies will be made available to bus service enhancements to serve the development site);**

**vii) a financial contribution towards the cost of making Traffic Regulation Orders relating to waiting, speed limits, weight limit and temporary closure of Cemetery Lane totalling £15,000 which would be indexed linked.**

**vii) a financial contribution towards the monitoring of the Travel Plans for the Development totalling £5,000 which would be indexed linked.**

**viii) a financial contribution towards the outdoor leisure facilities at Culver Close / Victory Field totalling £30,907 which would be indexed linked.**

**ix) a financial contribution towards the expansion of Bradford on Avon cemetery totalling £3,750 which would be indexed linked.**

**x) a financial contribution towards monitoring, improving and mitigating air quality issues within the Bradford on Avon Air Quality Management Area totalling £20,000 which would be indexed linked.**

**xi) the practical completion of the new Anthony Best Dynamics factory and the relocation of the business onto the development before the first occupation of the 50th open market dwelling.**

**xii) the practical completion of phase 1 of the 'work-hub' development before the first occupation of the 80th open market dwelling.**

**xiii) the provision of circa 1.5 hectares of public open space on site (including equipped play areas), with payment of a commuted sum towards its initial management if the Council is requested to adopt it;**

**xiv) the provision of private allotments;**

**xv) the provision of a series of highway improvement works including widening of pedestrian facilities from the site to the junction of Wooley Street/Silver Street; provision of a new roundabout; provision of a new access to the employment area with realignment to highways; and dedicated pedestrian crossings and refuges on Holt Road.**

And subject to the following planning conditions:

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

- 2 No development shall commence on the housing development until details and samples of the materials to be used for the external walls and roofs of the housing development have

been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

REASON: In the interests of visual amenity and the character and appearance of the area.

- 3 No development shall commence on the employment development until details and samples of the materials to be used for the external walls and roofs of the employment development have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

REASON: In the interests of visual amenity and the character and appearance of the area.

- 4 No development shall commence on the allotment development until details and samples of the materials to be used for the external walls and roofs of the communal barn have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

REASON: In the interests of visual amenity and the character and appearance of the area.

- 5 No development shall commence on the respective employment or housing sites until a scheme of hard and soft landscaping has been submitted to and approved in writing for those sites by the Local Planning Authority, the details of which shall include for each:-

- location and current canopy spread of all existing trees and hedgerows on the land;
- full details of any to be retained, together with measures for their protection in the course of development;
- a detailed planting specification showing all plant species, supply and planting sizes and planting densities;
- finished levels and contours;
- means of enclosure;
- car park layouts;
- other vehicle and pedestrian access and circulation areas;
- all hard and soft surfacing materials;
- minor artefacts and structures (e.g. furniture, play equipment, refuse and other storage units, signs, lighting etc);
- proposed and existing functional services above and below ground (e.g. drainage, power, communications, cables, pipelines etc indicating lines, manholes, supports etc); and
- retained historic landscape features and proposed restoration, where relevant.

REASON: To ensure a satisfactory landscaped setting for the development and to protect and enhance biodiversity interests.

- 6 No development shall commence on site until a scheme of phasing programme for the development and associated landscaping has been submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure the development is phased so as to minimise any harm during the construction period and that a satisfactory landscape setting is created and to protect and enhance biodiversity interests.



- 7 All soft landscaping contained in the approved details of landscaping shall be carried out in accordance with the approved phasing programme required by condition 4.

All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority.

All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and to protect and enhance biodiversity interests.

- 8 No building shall be first occupied until a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscape areas, (other than small, privately owned, domestic gardens, but for the avoidance of doubt including the allotments) has been submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out in accordance with the approved details.

REASON: To ensure the proper management of the landscaped areas in the interests of visual amenity.

- 9 No development shall commence on site until a habitat and ecological management plan has been submitted to and approved in writing by the Local Planning Authority. This shall include:

- \* a set of detailed objectives;
- \* a drawing showing the locations of habitat features of importance for bats;
- \* a requirement for those with landscape management responsibilities to ensure bat habitat features are retained and enhanced through appropriate management for the lifetime of the development;
- \* a programme of management works including annual and less frequent works required to maintain the bat habitat features in good condition.
- \* details of monitoring for compliance against the plan objectives.

The habitat and ecological management plan shall be carried out in accordance with the approved details.

REASON: In the interests of preserving and enhancing biodiversity and protected species.

- 10 Notwithstanding the hereby approved plans, no development shall commence on site until details of the design, external appearance and decorative finish of all railings, fences, gates, walls, bollards and other means of enclosure have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved phasing programme required by condition 4.

REASON: In the interests of visual amenity and the character and appearance of the area.

- 11 No development shall commence on those parts of the site within the root protection areas/canopies of protected and retained trees until a full 'No-Dig' specification for works within these areas has been submitted and approved in writing by, the Local Planning Authority. The construction of the surface shall be carried out in accordance with approved details and thereafter retained.

REASON: In order to protect trees on and adjacent to the site which are to be retained with surfacing placed near to or over the trees root system.

- 12 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (as amended by the Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2008 (or any Order revoking or re-enacting or amending that Order with or without modification), no windows, doors or other form of openings other than those shown on the approved plans, shall be inserted in the:
- east elevation of plot 11;
  - north elevation of plot 67; and
  - north elevation first floor of plot 133.

REASON: In the interests of residential amenity and privacy.

- 13 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (as amended by the Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2008 (or any Order revoking or re-enacting or amending that Order with or without modification), the garages hereby permitted shall not be converted to habitable accommodation.

REASON: To secure the retention of adequate parking provision, in the interests of highway safety.

- 14 No development of the proposed impermeable parking areas and hardstandings shall commence on site until details of surface water drainage from these areas, including oil interceptors has been submitted and approved by the Local Planning Authority. The areas/hardstandings shall not be first brought into use until the oil interceptors have been installed in accordance with the approved details. Thereafter the oil interceptors shall be retained in accordance with the approved details. Roof water shall not pass through the interceptors.

REASON: To minimise the risk of pollution of the water environment.

- 15 No development shall commence on site until the final scheme for the discharge of foul water from the site, incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be first occupied until foul water drainage has been constructed in accordance with the approved scheme.

REASON: To ensure that the development can be adequately drained, minimise the risk of pollution and minimise the risk of flooding on the site and downstream.

- 16 Any facilities above ground for the storage of oils, fuels or chemicals shall be sited on an impervious base and surrounded by impervious walls. The volume of the bunded compound shall be at least equivalent to the capacity of the tank plus 10%. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipe work should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge into the bund. The associated development shall not be first occupied until such facilities have been constructed and completed in strict accordance with plans approved by the Local Planning Authority.

REASON: To prevent pollution of the water environment

- 17 No development shall commence until:
- a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved in writing by the Local Planning Authority; and
  - b) The approved programme of archaeological work has been carried out in accordance with the approved details.

Furthermore the development shall be carried out in accordance with the 'Method Statement for Landscape Construction Works within Area of Archaeological Interest' by McGregor Smith received on 20 December 2013.

REASON: To protect archaeological interest and to enable the recording of any matters of archaeological interest.

- 18 No development shall commence until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include details of how the scheme shall be maintained and managed after completion.

REASON: To ensure that the development can be adequately drained, minimise the risk of pollution and minimise the risk of flooding on the site and downstream.

- 19 No development approved by this permission shall be commenced until a Construction Environmental Management Plan, incorporating:
- a working method statement for road construction detailing how the works will be controlled;
  - details of how bat monitoring and vibration monitoring will be used during construction to avoid harm to bats and instability in the mine;
  - position, design and timescale for protective fencing which will be erected to exclude construction machinery from land above Coombe Mine;
  - working restrictions to minimise impacts on bat movement at night;
  - pollution prevention measures,

has been submitted to and approved by the Local Planning Authority. The plan shall subsequently be implemented in accordance with the approved details and agreed timetable.

REASON: In order to protect the natural environment.

- 20 All fixed plant and machinery shall be so sited and designed in order to achieve a Rating Level of -5dB below the lowest measured background noise level, determined at the nearest noise sensitive receptor. Measurements and assessment shall be carried out in accordance with BS4142:1997.

REASON: In order to safeguard the amenities of the area in which the development is located.

- 21 The working hours during the construction phase shall be limited to:
- |                          |             |
|--------------------------|-------------|
| Monday – Friday:         | 0800 - 1800 |
| Saturdays:               | 0830 – 1300 |
| Sundays/Public Holidays: | None        |

REASON: In order to safeguard the amenities of the area in which the development is located.

- 22 Vehicle deliveries shall be limited to:-
- |                          |             |
|--------------------------|-------------|
| Monday – Friday:         | 0800 – 1800 |
| Saturdays:               | 0900 – 1300 |
| Sundays/Public Holidays: | None        |

REASON: In order to safeguard the amenities of the area in which the development is located.

- 23 No development shall commence until a final external lighting scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include plans showing all public, private domestic and private commercial external lighting. The scheme shall detail the type of light appliance, the height and position of fitting, illumination levels and light spillage. The scheme shall achieve Environmental Zone Category E2 levels or less, complying with guidance issued by the Institution of Lighting Engineers. Furthermore the scheme shall be designed specifically to achieve light levels that avoid harm as far as reasonably practical to bats by complying with the lux plot contained in scheduled additional information “eg12492: Further Information to Inform a HRA” and scheduled drawing “0066-1300-004 Rev A”; and reducing light levels towards 1 lux near trees along the sites northern boundary. The scheme shall include details of when lanterns will be switched off at night.

REASON: In the interests of the amenities of the area and to minimise unnecessary light spillage above and outside the development site and protect biodiversity interests.

- 24 No development shall commence on site until an investigation of the history and current condition of the site to determine the likelihood of the existence of contamination arising from previous uses has been carried out and all of the following steps have been complied with to the satisfaction of the Local Planning Authority:

Step (i) A written report has been submitted to and approved by the Local Planning Authority which shall include details of the previous uses of the site and any adjacent sites for at least the last 100 years and a description of the current condition of the sites with regard to any activities that may have caused contamination. The report shall confirm whether or not it is likely that contamination may be present on the site and the potential impact of any adjacent sites.

Step (ii) If the above report indicates that contamination may be present on, under or potentially affecting the proposed development site from adjacent land, or if evidence of contamination is found, a more detailed site investigation and risk assessment should be carried out in accordance with DEFRA and Environment Agency's "Model Procedures for the Management of Land Contamination CLR11" and other authoritative guidance and a report detailing the site investigation and risk assessment shall be submitted to and approved in writing by the Local Planning Authority.

Step (iii) If the report submitted pursuant to step (i) or (ii) indicates that remedial works are required, full details must be submitted to the Local Planning Authority and approved in writing and thereafter implemented prior to the commencement of the development or in accordance with a timetable that has been agreed in writing by the Local Planning Authority as part of the approved remediation scheme. On completion of any required remedial works the applicant shall provide written confirmation to the Local Planning Authority that the works have been completed in accordance with the agreed remediation strategy.

REASON: To ensure that land contamination can be dealt with adequately prior to the use of the site hereby approved by the Local Planning Authority.

- 25 No development shall commence until a scheme of public art, including a timetable for delivery, has been submitted to and approved in writing by the Local Planning Authority. The public art shall be provided in accordance with the agreed timetable.

REASON: In the interest of public amenity and appearance of the development.

- 26 No development shall commence until details of bat and bird boxes (including those integrated into the fabric of the built environment), including a plan to show their location have been submitted to and approved in writing by the Local Planning Authority. These shall subsequently be installed before any dwelling is first occupied.

REASON: In order to preserve and enhance biodiversity interests.

- 27 No part of the development shall be first occupied until the entrance of Combe Mine county wildlife site has been fitted with a protective metal grill to prevent public access.

REASON: In order to minimise potential disturbance to protected species and their habitat.

- 28 No tree will be felled or pruned unless it has been assessed by a professional ecologist for risks to bats within the previous 12 months and the works are undertaken following the advice of the ecologist.

REASON: In the interests of protected species.

- 29 No hedgerow or tree removal will be undertaken on the site until advanced planting works are completed in accordance the approved phasing programme required by condition 4.

REASON: In the interests of protected species.

- 30 Notwithstanding the details submitted, no development shall commence on site until details of the estate roads, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, vehicle overhang margins, embankments, visibility splays, accesses, carriageway gradients, drive gradients, car parking and street furniture, including the timetable for provision of such works, have been submitted to and approved by the Local Planning Authority. No part of development shall be first occupied until the estate roads, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, vehicle overhang margins, embankments, visibility splays, accesses, carriageway gradients, drive gradients, car parking and street furniture that serve that part of the development have all been constructed and laid out in accordance with the approved details, unless an alternative programming arrangement is agreed in the approved details.

REASON: To ensure that the roads are laid out and constructed in a satisfactory manner.

- 31 The roads, including footpaths and turning spaces, shall be constructed so as to ensure that, before it is occupied, each dwelling has been provided with a properly consolidated and surfaced footpath and carriageway to at least base course level between the dwelling and existing highway.

REASON: To ensure that the development is served by an adequate means of access.

- 32 The Class B1 and B2 development hereby approved shall not be first brought into use until that part of the service road which provides access to it has been constructed, and all parking and manoeuvring spaces have been completed in accordance with the approved plans. The parking and manoeuvring spaces shall only be used for the purpose of parking and manoeuvring at all times.

REASON: To ensure that the development is served by an adequate means of access and parking.

- 33 No Class B1 or B2 development shall commence on site until details of secure covered cycle parking and changing and shower facilities have been submitted to and approved in writing by the Local Planning Authority. The spaces, and changing and showering facilities, shall be made available for use prior to the first occupation of the development hereby permitted and shall be retained for use at all times thereafter.

REASON: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than the private car.

- 34 No building shall be occupied on the respective parts of the site (employment/residential) until a Green Travel Plan for the respective part of the site has been submitted to and approved in writing by the Local Planning Authority. The Residential Travel Plan shall include details of implementation and monitoring and shall be implemented in accordance with these agreed details. The employment use Travel Plan shall identify measures that are disincentives for employee travel as single car occupants. The results of the

implementation and monitoring shall be made available to the Local Planning Authority on request, together with any changes to the plan arising from those results. The travel plans shall each have a minimum period of operation of 6 years from the date of first occupation of the respective land uses.

REASON: In the interests of road safety and reducing vehicular traffic to the development.

- 35 Before the development hereby permitted is commenced, a Construction Traffic Management Plan shall be submitted to and approved in writing by the local planning authority. The Plan shall identify what routes are to be used by construction lorries and vans to serve the site, how the construction traffic will avoid adding to congestion in Bradford on Avon, what arrangements will be put in place to ensure exiting lorries and vans do not cause mud and other deleterious materials being deposited on the local roads

REASON: In order to ensure that existing highway users are not unduly inconvenienced by development related construction traffic

- 36 The access to the designated allotments shall be limited to maintenance and service vehicles only.

REASON: In order to define the terms of this permission and highway safety.

- 37 The 25 parking spaces opposite residential units 68-80 within the work-hub employment area shall be made available for public parking at weekends, bank holidays and from 18.00 to 07.00 hrs (the next day) on all other days.

REASON: In order to alleviate on-street parking demand and make an efficient use of the development's off-street parking provision.

- 38 No development shall commence until detail of new bus stop positions and facilities within the vicinity of the site have been submitted to and approved in writing by the Local Planning Authority. Those details shall include an agreed timetable for the works.

REASON: In order to improve sustainable transport options for those living and/or working at the development without prejudice to existing residents and workers.

- 39 The development hereby permitted shall be carried out in accordance with the following approved plans listed in schedule

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REASON: For the avoidance of doubt and in the interests of proper planning.

**Informative(s):**

- 1 There must be no interruption to the surface water drainage system of the surrounding land as a result of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively and that riparian owners upstream and downstream of the site are not adversely affected.

- 2 There are ordinary watercourses either within or in close proximity to the site. If you intend to obstruct the flow in the watercourse (permanently or temporarily, including culverting) you will require prior Land Drainage Consent from Wiltshire Council as the Lead Local Flood Authority. You are advised to contact the Drainage Team to discuss their requirements:-

<http://www.wiltshire.gov.uk/communityandliving/civilemergencies/drainage/drainageordinarywatercourseconsent.htm>

- 3 Safeguards should be implemented during the construction phase to minimise the risks of pollution from the development. Such safeguards should cover:
- the use of plant and machinery
  - oils/chemicals and materials
  - the use and routing of heavy plant and vehicles, including wheel-wash
  - the location and form of work and storage areas and compounds
  - the control and removal of spoil and wastes.

The applicant should refer to the Environment Agency's Pollution Prevention Guidelines at:

<http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx>.

- 4 The archaeology work should be conducted by a professional archaeological contractor and there will be a financial implication for the applicant.
- 5 It should be noted that the new Part L Clause 25 of the 2013 Building Regulations may require documentation of a low carbon/centralised energy strategy approved by the local authority.
- 6 The developer is encouraged to consider the installation of sprinkler systems within the development in the interests of fire safety.
- 7 The applicant is advised that erection of a grille across the entrance of Coombe Mine is likely to require a licence from Natural England.
- 8 Within the submission of landscaping condition discharge the following matters will be expressly addressed:
- \* details of a planting scheme along northern boundary of the site and timescale for its implementation which is necessary to provide a commuting route for bats as soon as possible during the construction programme;
  - \* details of planting that will be undertaken around the entrance to Coombe Mine to provide visual screening; and
  - \* planting plans will demonstrate how dark bridges will be created to encourage bats to cross new roads.