

Introduction

High quality design should have the site informing the brief.

In this situation this appears to be reversed, with the council brief stating a development of 20 to 25 units (see Application Form – Description).

The architects have gone for the minimum amount in the brief – but this is still massive over development.

The planning permission application form states affordable housing independent living apartments (C3) for older people. Not sheltered accommodation.

This is a change of use from C2 to C3, a loss of a community asset. This has not been properly considered.

Transportation

The application states there are 14 existing carparking spaces, 0 (zero) light goods vehicles, and 0 (zero) disability spaces.

The application proposes 15 car parking spaces, 1 light goods vehicle, and 2 disability spaces. This is incorrect. The total proposed is 15 including the light goods and disability spaces.

The cumulative difference of spaces is stated as 1+1+2. It is actually 1.

In the pre-application Highways response, they state:

In respect to car parking, adequate provision must be provided to meet Wiltshire's Car Parking Standards, which states that 'retirement' accommodation should provide parking based upon 1 space per unit, plus an additional 1 space per 5 units for visitors. The indicative site plan provided thus shows a significant under provision from this.

This indicates the residential element of the proposal would require 24 parking spaces.

Mere Town council had similar concerns, stating:

Given that 20 apartments were being proposed, a big concern, however, was the adequacy of parking provision at only 14 or 15 parking spaces, particularly as it would be likely that some vehicles used by residents would need disabled access. An assurance that residents would be less likely to have their own vehicles seemed to be based upon assumptions about vehicle requirements of residents in similar properties in other towns/locations but it needs to be pointed out that Mere is not served well by public transport and, in our experience, the majority of our 60+ population would have either 1 or two cars and only a very small minority would have none. (Amesbury is well served by public transport whereas public transport in Mere is extremely limited by comparison). Furthermore, Mere town centre already suffers from parking congestion with much of the town centre parking restricted to a one-hour time limit during the day, so on-site parking provision will be a key consideration.

Advice from a town or parish council should be considered professional and impartial, and as such carries considerable weight.

The collision summary mentions the serious collision on 1/10/2022. Tragically this was a fatality. This mentions the pedestrian was crossing the road away from a formal crossing. There

is no formal crossing here, and this will be directly on the route from Fives Court to the Bus stop, via Barnes Place. This is the suggested route for getting a bus for the residents.

As the proposed development is for the relocation of residents from Lynch Close it's surprising there is no questionnaire on current vehicle ownership and use for these residents.

The only reliable bus service is for Gillingham School. I have two children who attend and if they ever have after school activities or go to the gym we have to go and pick them up, as there is never a service they can use. One child also works at Riversmeet, and they've never been able to use a bus, with us having to drop and pick them up. I know this will be considered anecdotal, but a questionnaire of local residents would find this story repeated again and again. This would conflict with the statement:

4.3.7 Overall, the site is considered to be suitably served by public transport. The proximity of the bus stops to the site, as well as their routeing and frequency, makes travel by bus a convenient and attractive option for site users.

The original proposal was for 20 new, affordable, independent living apartments for older people. These have now been relabelled as Sheltered Accommodation.

Nothing else has materially changed in the application which a cynic might view as an attempt to have a lower requirement for parking standards - as outlined in LTP 3 appendix C.

The lack of an on-site warden would back up this view, as this is normally a provision of sheltered accommodation.

Also within LTP 3 app C is guidance on parking for non-residential institutions stating a requirement of 1 parking space per 5m².

The day centre element of the development would fall into this, needing a further 20 parking spaces (based on 39m² activity area and 61m² communal area).

LTP 3 also has guidance on car ownership which is relevant:

Car ownership

3.14 According to the DfT's National Travel Survey, car ownership has been increasing slowly with 0.54 cars per adult in 1997 rising to 0.6 cars per adult in 2007. Every year approximately 10% of people give up their cars, and 11% of people become car owners. This leads to an overall net gain of 1%.

3.15 Car ownership is expected to continue to increase as incomes rise, cars become more affordable, more women learn to drive and households become smaller. There is a saturation point in car ownership, but we have not yet reached this in the UK as there is still scope for further growth among certain sections of the population: for example, 54% of households in the lowest income quintile do not own a car compared to 10% in the highest income quintile.

3.16 Wiltshire already has high car ownership levels: 40% of households in Wiltshire had access to two or more cars in 2001 compared to the average in England of 29.5%. However, there are clear geographic differences in the distribution of households without access to cars (see Figure 3.3). Over one in four households in Salisbury do not have access to a car compared to less than one in ten in Southern Wiltshire. Car ownership is generally higher among low-income households in rural areas where cars are viewed as a necessity, than amongst low-income families in urban areas where they may be seen as a luxury. Access to education, employment

and leisure facilities can be particularly difficult for those who do not have access to a car in more rural areas.

With an inadequate provision for on-site parking this will mean car parking spilling onto the surrounding area.

Barnes Place already has problems with parking on the turning area, which has caused problems for both fire and ambulance services.

An increase of parking in front of the United Reform Church will impact visitors to the post office and Jeans Electricals.

Other areas which could be used by overspill parking are Angel Lane, and all along Church Street, affecting residents, businesses, church and library visitors.

The traffic measuring in the report was flawed.

The monitoring was placed close to the junction in Barnes Place, so cars were travelling slowly. Speed is an issue on the road.

The monitoring on Angel Lane was placed beyond the Fives Court turning, so didn't measure all the traffic.

The local store is classified as a convenience store, not a supermarket. Therefore, there will be more travel for the weekly shop (nearest in Gillingham).

Transportation summary

- The parking is inadequate and doesn't meet Wiltshire Councils own guidance. Even based on the lower requirements of sheltered accommodation, the application should need 34 parking spaces (14 for residents and 20 for the day centre).
- There is no allowance for future increase in car ownership as outlined in LTP 3.
- Some of this parking is in a root protection zone of an ancient Yew tree which is protected by a TPO.
- The transport statement is flawed, so its conclusions must be considered in this light.
- Pedestrian safety needs better consideration.

Impact on a Conservation Area

The heritage statement outlines a less than substantial harm.

I disagree with this; the overall design would lead to harm to the character of the site itself and the surrounding conservation area.

The scale of the building and massing – especially the height of the roofs, will dominate the area, especially towards the edge of the site. This is not in line with policies to conserve views into and out of a conservation area.

Referencing the previous building doesn't mitigate this, as this was clearly inappropriate development for a conservation area.

The section 72 duty to pay special attention to enhancing the character or appearance of a conservation area would suggest removing the inappropriate development – not using it as justification for further inappropriate development.

Impact on surrounding properties

The daylight and sunlight assessment, screening to balconies, and use of obscured glazing are an acknowledgement of the potential impact on surrounding properties.

Nowhere is there an assessment of the acoustic impact.

In normal housing second floor rooms are predominantly bedrooms; private spaces occupied at night with curtains drawn.

The proposal has living spaces and external living areas on the second floor.

With most of the tenants being retired they will be spending a lot of time at home, significantly increasing the impact of these rooms.

Sound travels further when produced above ground level, and the high occupancy use will create significant impact.

There are proposed shared ground floor outdoor spaces. Encouraging the use of these also encourages social interaction.

Isolation can be a real issue for retirees. There are plenty of surrounding structures and walls at ground floor level to help contain and reduce noise pollution.

The central courtyard also encourages socialising away from neighbouring properties.

The scheme must be redesigned or refused if it cannot protect the neighbouring properties living conditions.

Water management

The planning application states that rainwater will be dealt with by use of a soakaway.

A 1,250 m² roof (approx. 13,500 square feet) requires a significant, engineered stormwater management system rather than a standard small soakaway.

Based on general guidelines, a 50 m² roof typically requires 1m³ of crate storage, suggesting a need for approximately 25 m³ to 30 m³ of actual void space (depending on local rainfall intensity and soil porosity).

This shouldn't be within 5m of a building or road. This isn't shown on plans, and I can't see anywhere on site where this can be achieved for the required size.

The environmental assessment doesn't mention this.

So what should be done, and will be supported by the community?

Mere Surgery are still keen to move to a larger location so they can provide more and better services. A move to Fives Court would be widely supported by the community.

Alternatively, from discussions with neighbours, I believe a scaled back scheme would also be supported.

If the second storey and day centre are removed from the design, there is space for 14 units on the ground floor. Just a 30% decrease in the proposal.

This reduces the parking issues, overlooking and sound pollution; as well as saving huge sums on lifts, stairs and maintenance.

The Grove Building is very underutilised, making a suitable alternative for the day centre. This also benefits from already having a car park just behind it that has access directly onto the main road through mere (B3092).

The single storey structures could have green roofs with south facing solar panels. These would:

- Maximise solar generation
- Increase energy efficiency
- Provide stormwater management
- Increase biodiversity
- Improve air quality
- Reduce sound pollution
- Extend roof lifespan
- Reduce urban heat island effect
- Improve views into and out of a conservation area
- Reduce impact on neighbouring properties

Drawings

- ***‘WLTB-Fives Court-East West massing analysis.pdf’***
This highlights the increase in size and consequent impact on a conservation area. The existing area of structure above the eaves line (109.81m) is 77.2m², while the proposal shows 206.9 m² - an increase of 168%.
- ***‘WLTB-Fives Court-North South massing analysis.pdf’***
This highlights the increase in size and consequent impact on a conservation area. The existing area of structure above the eaves line (109.81m) is 27.2m², while the proposal shows 146.1 m² - an increase of 437%.
- ***‘WLTB-Fives Court-Massing relative to 11 and 12 Barnes Place.pdf’***
The previous massing analysis focuses on the increase relative to the existing over-development. This drawing highlights the huge scale disparity between the proposal and the existing properties to the East of the site.
- ***‘WLTB-Fives Court-Overlooking to the East and South.pdf’***
This drawing shows the views from the balconies and windows on the second storey into and over adjoining properties, and the massive impact this will have. The proposed screening will have minimum impact on privacy. The screens will have no effect on the travel of sound.
- ***‘WLTB-Fives Court-Overlooking to the North.pdf’***
This drawing shows the views from the balconies and windows on the second storey into and over adjoining properties, and the massive impact this will have. The proposed screening will have minimum impact on privacy. The screens will have no effect on the travel of sound.

Yours faithfully,
Will La Trobe-Bateman