

Formal objection to planning application PL/2025/05347

Land at Winsley Road, Bradford-on-Avon BA15 2HL

Proposal changes of use to dog walking field and associated works

To - Wiltshire Council planning department

We are the owners and occupiers of land immediately adjoining the application site and wish to register our strong objection to planning application PL/2025/05347

We have serious concerns about the suitability of this proposal in this location and, in particular, about its implications for highway safety, pedestrians and cyclists, neighbouring agricultural operations and livestock, flooding and drainage, residential amenity, and the accumulative intensification of activity in the sensitive rural location.

We consider that the application, as presently submitted, has not adequately demonstrated that these impacts can be satisfactorily addressed.

1. Highway safety-new access across a shared pedestrian and cycle route

Our most serious concern is the proposed new vehicular access in the south-eastern corner of the site. The applicant confirms that the access has been materially altered from the original proposal following concerns raised by the highway officer. The existing access is now proposed to be closed and a new access created in the south-eastern corner, with associated visibility splays and parking and turning for two vehicles.

The app applicant's own statement therefore establishes that highway considerations have already been a significant issue in the determination of this application.

Vehicles are required to cross a shared pedestrian and cycle way. This is not simply an ordinary pedestrian footpath. It is a route used by cyclists and pedestrians, including children travelling between Winsley village primary school and St Laurence secondary school in Bradford-on-Avon.

This raises a significant and specific highway safety concern.

The submitted planning statement states that the proposed access will be safe and that sufficient visibility splays can be achieved. However, we have seen no evidence in the submitted statement demonstrating that the applicant has undertaken a properly timed survey of the actual number and pattern of pedestrians and cyclists using this route.

There is no apparent evidence of a pedestrian count, a cycle count, a survey during school arrival times, a survey during school departure times, an assessment of children cycling to and

from Winsley primary school and Saint Lawrence secondary school, an assessment of the interaction between vehicles entering and leaving the dock field and cyclists using the shared route or an assessment of the cumulative effect of these movements during the proposed operating hours.

This impression is the current proposes a commercial dog walking facility operating throughout daylight hours, with potentially frequent vehicle movements.

The applicant states that the field will operate with one booking per hour, with each booking lasting 50 minutes and a 10-minute interval between bookings. The proposed summer opening hours are 6 AM till 9 PM. This could result in a substantial number of vehicle movements across the shared route over the course of a day.

The applicant states that likely users will arrive in a single car, but this is an assumption rather than an evidenced assessment of actual vehicle movements.

We therefore strongly request that the highway authority does not determine the revised access to be acceptable without first requiring an appropriately timed pedestrian and cycle survey, including surveys during school arrival and departure periods. The highway authority should also assess the visibility and interaction between vehicles and non-motorised users from the perspective of the people using the shared route, not solely from the perspective and of an approaching motorist.

Wiltshire Council's own planning material recognises the importance of considering pedestrian and cycling movements and potential points of conflict between vehicles and pedestrian and cycle routes.

The proposed access creates a new point of conflict between motor vehicles and an established route used by pedestrians and cyclists including schoolchildren.

2. The access will materially intensify vehicle movements in the vicinity of our property.

We are also directly affected as adjoining landowners. The proposed access is materially closer to our property and agricultural land than the existing access arrangement.

The proposal would introduce a new commercial use with regular vehicle arrivals and departures immediately adjacent to land which is actively used for agriculture and livestock.

Our land is used for keeping sheep. We therefore have legitimate concerns about the introduction of a regular dog walking operation immediately adjacent to livestock and about the potential interaction between dogs, vehicles and agricultural activity.

3. Impact upon adjoining livestock and agricultural use

The application does not, in our view, adequately assess the implications of placing a commercial dog walking facility immediately alongside land use for sheep.

The applicant proposes a fenced dog walking field and states that the facility will be closely monitored. However, that does not amount to a proper assessment of the compatibility between the proposed use and the established agricultural use of adjoining land.

Specific matters requiring consideration include, the risk of dogs escaping from the proposed field, the adequacy and specification of the proposed perimeter fencing, the consequences of any failure of the fencing or access arrangements, interactions between dog walkers, vehicles, the ability to safely undertake normal agricultural activities adjacent to the dog field and whether an adequate physical separation is proposed between the dog walking activity and the neighbouring livestock.

These matters are particularly important because this is not an established dog walking facility being formalised in an otherwise urban environment. It represents the introduction of a new commercial recreational use into an agricultural setting.

The application should demonstrate, rather than simply assert that these two uses can coexist without unacceptable impacts.

4. Flooding and surface water drainage

We have serious concerns regarding the applicant's treatment of flooding and drainage.

The planning statement states that the site lies wholly within the flood zone one.

However, the flood zone designation does not demonstrate that the land has never flooded or that there are no localised surface water drainage problems.

We have photographic evidence demonstrating flooding in the area of the proposed development.

This is important site-specific evidence which should not be disregarded simply because the land is classified as flood zone one.

The proposal includes a number of physical interventions including a new vehicular entrance, associated warning, parking and turning area, fencing, landscaping, a storage container, a timber shelter and associated parts and facilities.

The council should therefore satisfy itself that the development will not alter existing drainage patterns or increase surface water problems affecting neighbouring land.

We particularly object to the proposed structure being treated as acceptable merely because the site is identified as being in flood zone one.

We request that the council properly considers the photographic evidence of historical flooding and requires a site-specific assessment of surface water drainage and the effect of the proposed works before determining the application. We are willing to provide the photographic evidence to the council and identify the locations and circumstances in which the flooding occurred.

5. The proposed timber shelter and other structures require proper consideration.

The application describes a small timber open fronted shelter and a 20-foot storage container. The storage container is stated to be approximately 6.05 m long, 2.44 m wide and 2.59 m high. These structures should not be considered in isolation. They form part of a wider change the introduction of buildings, fencing, parking, a new access and associated infrastructure represent a material intensification of the use of this countryside location.

Given the evidence of flooding, the proposed location and ground conditions of the shelter and container should also be properly assessed.

6. Noise and disturbance

The applicant states that barking will be infrequent and that the majority of dogs will make no noise. We do not consider this to be a sufficiently robust basis upon which to conclude the proposal is specifically for a facility designed to bring multiple dogs to an increase field on a regular commercial basis. The applicant statement acknowledges the possibility of excessive noise by proposing that users may be excluded if excessive noise becomes a recurring issue. That is effectively an acknowledgement that noise is a foreseeable operational issue. The council should therefore consider whether the proposed noise management plan provides sufficiently robust and enforceable safeguards for neighbouring properties and agricultural land.

7. Opening hours and intensity of use

Summer 6 AM till 9 PM, winter 7 AM to 5 PM. The facility is proposed to operate every day of the year during daylight hours. This means the impact cannot properly be characterised as occasional recreational use. It is a commercial operation capable of generating regular daily vehicle movements, pedestrian movements, dog activity and noise over a substantial part of the day.

The council should assess the proposal on the basis of its maximum proposed operating pattern, rather than on an assumption that users will generally be quiet all the vehicle movements will be minimal.

8. Cumulative impact and the changing character of this part of Winsley Road

We are also concerned about the cumulative effect of development and intensification in this area. There are exploratory discussions concerning potential future development including land around Saint Laurence playing fields and the land from Saint Laurence playing fields towards Winsley Road.

We fully recognise that there is presently no planning application for that potential development and therefore do not ask the council to determine a hypothetical future application as part of this proposal.

Nevertheless, the existence of emerging development pressure in the surrounding area reinforces the importance of properly understanding the existing pedestrian, cycling, agricultural and highway environment before approving further intensification.

The council should not consider this proposal in isolation from the physical characteristics and existing uses of this part of Winsley Road.

In particular the shared pedestrian and cycle route, school movements, agricultural activity, livestock and existing residential properties form an established network of uses which the new commercial facility will interact with.

9. The applicant's conclusions are not supported by sufficient evidence.

The applicant concludes that the proposal will preserve the character of the area, will not harm nearby residents, can be accessed safely from the public highway and will provide a safe local facility.

Those conclusions advanced by the applicant. They should not be treated as established facts.

In our view, the application does not adequately demonstrate these conclusions particularly in relation to actual pedestrian and cycle use of the shared route, schoolchildren using that route, interaction between vehicles and cyclists and pedestrians, the consequences of the new access for adjoining landowners, livestock and agricultural operations, historical flooding and surface water drainage, the practical consequences of regular dog activity and the cumulative intensification of this will location

10. Request for further assessment

Before the application is determined we respectfully request that Wiltshire Council, and the highway authority require as appropriate.

1. A properly timed pedestrian and cycle survey of the shared route including school arrival and departure periods
2. A specific assessment of the safety of children cycling to and from Saint Laurence school and Winsley primary school.
3. A detailed assessment of the interaction between vehicles using the proposed access and pedestrians and cyclists.
4. Proper consideration of the impact upon adjoining agricultural operations and shape
5. Assessment of the adequacy and security of the proposed fencing in relation to livestock and escaping dogs

6. A site specific assessment of historical flooding and surface water drainage
7. Consideration of whether the proposed shelter, container, access, parking and associated works could alter surface water flows.
8. A robust assessment of noise from repeated dog use, rather than reliance upon assumptions about how much individuals' dogs may bark.
9. Confirmation of how the proposed operating regime will actually be monitored and enforced
10. Consideration of the cumulative impact of the proposal in the context of the existing and emerging development pressures in the surrounding area

We are not objecting nearly to the principle of people exercising dogs in the countryside. Our objection is to the location, access arrangement and cumulative impacts of this particular proposal. The application would introduce a commercial dog walking operation immediately alongside established agricultural land containing sheep, introduce a new vehicular access across shared pedestrian and cycle route used by children travelling to school, introduce regular vehicle movements close to our property, and introduce additional structures and infrastructure into a rural location where we also have direct evidence of flooding.

In our view does not adequately demonstrate that these impacts can be satisfactorily managed.

The proposed new access in particular deserves much greater scrutiny. The fact that the access has already had to be substantially revised following highway concerns makes it especially important that the council is satisfied that the revised arrangement is genuinely safe for all highway users, including pedestrians and cyclists.

We therefore strongly object to this planning application and request that planning permission is refused.

In the alternative, should the council be minded considering approval, we request that determination is deferred until the matters identified above have been properly assessed and evidenced, particularly the highway and cycleway issue and the flooding and drainage concerns. Any permission should only be granted if the council is satisfied that robust enforceable conditions can adequately protect highway users, neighbouring residents, livestock, agricultural operations and the local environment.

Yours faithfully

Edward and Rebecca Townsend

