# ROUNDWAY MILL LONDON ROAD DEVIZES

# PLANNING BRIEF

# Adopted by Kennet District Council June 2004

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## CONTENTS

- **1.0 INTRODUCTION**
- 2.0 PLANNING POLICY FRAMEWORK
- 3.0 PLANNING HISTORY
- 4.0 ACCESS AND PARKING
- 5.0 EXISTING SITE AND CONTEXT
- 6.0 PUBLIC CONSULTATION
- 7.0 PRINCIPLES OF DEVELOPMENT

#### 8.0 ILLUSTRATIVE DEVELOPMENT PROPOSALS

9.0 FIGURES:

1	Site Location Plan	03 RDM SL1	1:1250
2	Site Survey	03 RDM SU1	1:500/1:200
3	Site Constraints Plan	04 RDM SK03A	
4	Revised Outline Site Proposals	04 RDM SK04	
Illu	strative Artist Impressions		
5	View of Main Apartment Block	04 RDM SP12	
6	View of Crescent	04 RDM SP13	

10.0

#### **APPENDICES**

- APPENDIX 1 Summary of the relevant policies in Kennet District Local Plan
- APPENDIX 2 Archaeological Enquiry

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APPENDIX 3 Photographs
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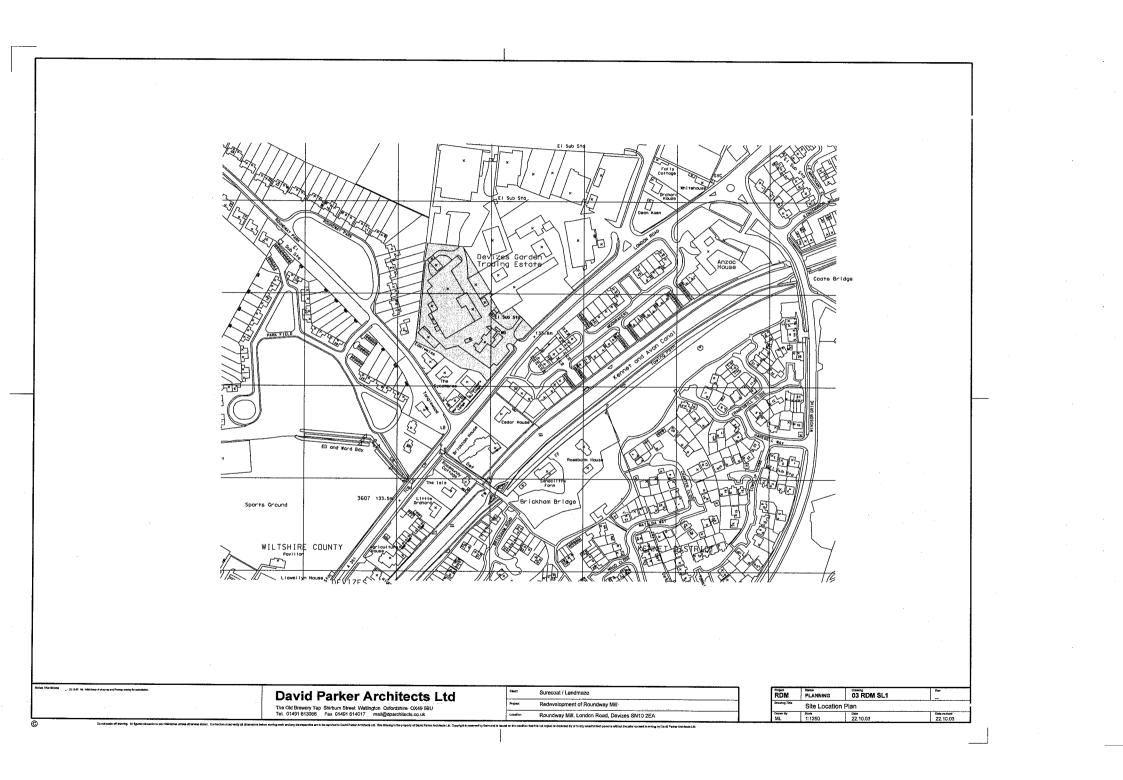
	Photoboard 3	Traditional Built Form and Details
	Photoboard 4	Recent High Density Residential Development
	Photoboard 5	Site Survey and Immediate Context
		Supplementary Photographs
	Photoboard 6	Glory Mill Wooburn Green and the Waterside Aylesbury;
		Examples for Consideration
APPENDIX 4	Public Consultatio	n Papers
	<b>F</b> • • • •	

APPENDIX 5 Environmental Acoustics – Noise consultant's report: Assessment and Recommendations

#### **1.0 INTRODUCTION**

- **1.1** Paragraph 1.19 of the Replacement Kennet District Council Local Plan (see Appendix 1) requires preparation of a development brief for all sites allocated for housing development in the Plan. Roundway Mill is one such allocated site. Therefore, this Planning Brief has been prepared in accordance with the aims of that policy and in conjunction with Kennet District Council.
- **1.2** The purpose of this Brief is to guide the form and scale of residential development on the Roundway Mill site.
- **1.3** In accordance with the guidance within para 1.19 this document includes an appraisal of the site and its context, a review of relevant planning policies and guidance, an indication of the measures proposed to meet the impact of the development and a statement of development and design principles.
- **1.4** A draft of this document was prepared following preliminary discussions with officers of the District Council and Highway Authority, an investigation of the site, its surroundings and an analysis of the wider architectural/historical character of Devizes.
- 1.5 Following public consultation with neighbours and key stakeholders in Devizes the Draft Roundway Mill Brief was further amended. A summary of consultation is included at Appendix 4. Public consultation on the content and range of the Brief has been carried out in accordance with para 1.19 of the Kennet Local Plan 2011 and in accordance with PPG12. PPG12 requires full consultation before a policy document can be adopted as Supplementary Planning Guidance for the purposes of development control. The Planning Brief was adopted by Kennet District Council as supplementary planning guidance for the purpose of development control on the 3rd June 2004 by the Planning Policies Executive Committee. Supplementary

Planning Guidance provides guidance on the implementation and interpretation of policies and proposals contained in the Local Plan and should be taken into account as a material



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#### 2.0 PLANNING POLICY FRAMEWORK

#### 2.1 Density and Sustainability

The full range of policies applicable to this site are set out in Appendix 1. This section summarises those policies that have the greatest bearing.

- 2.2.1 Government policy is set out in PPG1 General Principles, PPG3 Housing and PPG 13 Transport. These policies have a common objective of seeking to guide new development to sustainable locations within established settlements and particularly to previously developed sites such as Roundway Mill. Great emphasis is placed on maximising the use of such sites by way of higher densities. This is all part of the Government's drive to secure more sustainable developments and to reduce the level of car dependency in favour of public transport and other means of travel such as cycling and by foot.
- **2.2.2** PPG 3 promotes the use of previously developed land at higher densities (35 50 dwellings per hectare), particularly on sites close to the Town Centre. Good design that takes account of the sites context, local distinctiveness and provides for a range of housing, are promoted as key to the concept of sustainable development. In order to achieve these objectives the guidance recommends a flexible approach to standards in respect of matters such as parking spaces, amenity provision, overlooking and density.
- **2.2.3** PPG13 Emphasises that new developments should be located close to public transport routes and make provision for alternatives to the motor car.
- **2.2.4** Roundway Mill clearly complies with the guidance in respect of its location and the fact that it is developed land. Its location is such that it is suitable for very high density development commensurate with the other constraints on the site outlined in section 2. It is proposed that the site could accommodate up to about 50 units depending on how well the design and planning constraints are handled within the design.

#### 2.3 Wiltshire County Council Structure Plan – 2001

The Structure Plan sets the context for the Replacement Kennet Local Plan. It has the following aims:

- **2.3.1** To support a sustainable pattern of development in Wiltshire, meeting the needs of the County's current and future population for:
  - a) a prosperous and robust economy
  - b) an attractive and suitably protected environment
  - c) good housing and community facilities through the strategic planning of land use and transport.

These aims are reflected in more detailed policies in the Replacement Kennet District Local Plan.

#### 2.4 Replacement Kennet District Local Plan

**2.4.1** The Replacement Kennet District Local Pan supersedes the current adopted Local Plan. It has been subject to a Local Inquiry, Inspector's Report and subsequent modification. It was adopted by the council on 30th April 2004. This section summarises those policies that are particularly relevant to the redevelopment of Roundway Mill.

- **2.4.2** Policy HC2 allocates Roundway Mill for housing development of about 30 dwellings which is just below the minimum density suggested in PPG3.
- **2.4.3** Policy HC12 gives more detail on the requirements of any development, in particular the need for development to accord with the Devizes Strategic Development Brief and an individual brief for the site. Other issues identified include the need to investigate possible contamination, the relationship with neighbouring uses and the provision of adequate access from London Road.
- **2.4.4** Para 1.19 sets out the factors which should be addressed in development proposals. These are set out in Section 7.0 DEVELOPMENT PRINCIPLES
- 2.4.5 Policy HC3 gives priority to the reuse of previously used land and buildings.
- **2.4.6** Policy HC5 seeks to secure a minimum density of 30 dwellings per hectare. In order to achieve higher densities than this the amount of open space that has to be provided on site may be reduced in consultation with the Council. On a small site such as Roundway Mill, which is in a very sustainable location, this is an essential consideration if the higher densities sought by PPG3 are to be obtained. Thus for this site it is only proposed to provide children's equipped play space. Casual and formal play space will be provided off site in accordance with the Devizes Strategic Development Brief.
- **2.4.7** HC7 encourages good street, path and cycle linkages with existing networks and also good access to public transport. It also encourages a mix of house types and layouts that support community interaction, recycling and energy conservation. On this site a mix of flats and houses of varying sizes is proposed together with a community room within one of the buildings.
- **2.4.8** HC8 requires developments to address the potential impact on community and other facilities. To a large extent this is what The Devizes Strategic Development Brief Does.
- **2.4.9** Policies HC28, HC29, HC30 and HC31 all relate to the provision of social housing. On this site a provision of approximately 30% subsidised housing is required. No low cost open market housing is required. The policies require that social housing be designed to a high standard and be fully integrated into the development in groups of not more than ten. The size and type of individual houses should reflect local needs. There is also supplementary planning guidance on the provision of social housing but this is currently under revision.
- **2.5.0** With respect to social housing provision discussions have already taken place with the Council and a mix of flats and houses agreed in principle as follows:-
  - 10 x 2 bed flats x 2 bed cottages x 3 bed cottages
- **2.5.1** HC34 and HC36 deal with recreation and amenity. As mentioned above (2.4.6) the requirement to meet this provision on site may be relaxed in appropriate situations. There is also supplementary guidance on recreation and amenity provision but to some extent it is superseded by the Requirements of Devizes Strategic Development Brief as far as this site is concerned. The Brief does not require single bed flats to contribute towards play space calculations.
- **2.5.2** Policy HC42 require developments to give consideration to social and community needs. It is intended to provide a community room within the site. Wider community facilities such as the schools will be dealt with through the Devizes Strategic Development brief.

- **2.5.3** The objectives of reducing dependency on the private motor car, supporting public transport and mitigating highway impacts, are secured through policy AT1 and AT9. AT1 sets out the highway and transport issues to be considered.
- **2.5.4** Policy AT9 in particular sets out maximum parking provision for new residential developments. For flats and most houses a maximum of two spaces would be allowed. There is no minimum requirement.

#### 2.6 Devizes Strategic Development Brief

This was approved by members for development control on 4th March 2004 and now has the status of Supplementary Planning guidance (SPG).

- **2.6.1** The purpose of the Devizes Strategic Development Brief is to assess the cumulative impact on local facilities and services arising from development of the sites allocated for housing in the Replacement Kennet Local Plan, and to see how those sites can jointly mitigate the impacts, either by on site provision or financial contributions towards provision. The Strategic Brief was approved as Supplementary Planning Guidance.
- **2.6.2** It considers policies that are only relevant to strategic provision and sustainability although most of these policies are also applicable to the individual site briefs such as this.

The key local facilities are;-

Social housing Recreation provision Education New primary school Additional social and community needs Off site infrastructure Transport appraisal process

**2.6.3** Of these, social housing, equipped play provision and community facilities are proposed to be provided on this site. Casual and formal play provision, education requirements and sustainable transport requirements will be met by financial contributions towards provision elsewhere.

In this way the important objectives of meeting the community needs arising from the development and securing sustainable alternatives to the motor car can be achieved.

The vehicle for securing the contributions and on site provision will be a formal legal agreement (S106 agreement).

#### 2.7 Devizes Community Area Plan

The Devizes Community Area Plan has been prepared following wide consultation with the local community. Thus although the Plan has no statutory planning status it should be taken into account as far as possible.

**2.7.1** The plan seeks to work towards securing the role of Devizes as the major economic and social centre of the area, to sustain outlying villages and to support community organisations.

Particular objectives relevant to this site are:-

- a) A place where leisure and sports facilities can be enjoyed.
- b) Access for young people to high performing schools, high quality support services and a good range of social activities.
- c) A place where new housing of all types is provided to meet local need.
- d) Support for an improved public transport between town and villages.
- e) A safe and well policed town.
- **2.7.2** These objectives will be met on the Roundway Mill site through a mix of housing types including social housing, equipped play provision on site, a community room on site, contributions towards the provision of a new junior school and towards the existing secondary school, contribution towards existing and new leisure facilities, and contributions towards sustainable transport.
- **2.7.3** The safety objective can be achieved by seeking to reinforce community identity through design and provision of facilities that encourage interaction. Good lighting and overlooking of public areas and parking areas can also help.
- **2.7.4** In moving forward with more detailed proposals we expect to address and provide details of how the following interests would be furthered in the proposals:
- 2.7.5 <u>Transport</u>: We recognise the need to encourage alternative uses of transport other than the car, but the development must include sufficient, convenient, safe and protectable car parking provisions as most people will rely to a greater extent on a car to get about. However, the design will make provision for and promote pedestrian and cycle use as much as possible, the layout is being designed to constrain traffic speeds to a minimum, and to provide safety for pedestrians and children as much as possible.
- 2.7.6 <u>Crime and Community Protection</u>: We strongly feel that we can make a big contribution by providing a new development which in its design, layout and fabric is likely to create a sense of community, where there will be social interaction, where public areas will be overlooked, and where opportunities for breaking and entering are all addressed and reduced to the minimum. Research has shown that if a housing estate is designed well, it can have a very positive impact on crime levels experienced later.

#### 2.8 Planning Obligations or Developer Contributions

A section 106 agreement will need to be completed between the Developer and the Council which will legally bind the Developer to paying contributions to infrastructure as identified by Council Policy. These are likely to include contributions on:

FACULTY	PLAN POLICY	
• Education	HC8, HC37, HC38	
• Off-site casual play	HC8, HC34	
• Off-site adult recreation	HC8, HC34	
• Sustainable transport improvements	HC8, AT10, AT11	
Affordable housing	HC8, HC28, HC29, HC30, HC31	
• Maintenance contributions for any adopted play areas	HC8, HC36	

• Local recycling facilities

#### 2.9 Summary

This is a brownfield site which is allocated for residential development. It has an excellent location near the edge of the town centre. It meets the requirements of PP3 and there is no reason why it cannot be developed to a high density and at the same time meet the requirements of existing planning policy and community objectives.

#### 3.0 PLANNING HISTORY

- **3.1** The site is an established general industrial site and therefore can be used for a wide range of industrial uses including heavy industry.
- **3.2** In 1996 an outline application for residential development was submitted reference **KD 33255** and refused in 1997. Since then planning policy has changed with greater emphasis on reusing previously developed sites for residential development including, where appropriate, industrial sites – PPG3. This site is appropriate because of its sustainable location and the history of environmental problems. This is now acknowledged in the revised local plan, which allocates the site for residential development.
- **3.3** 50 years ago the buildings were used as a flax mill, which also produced uniforms for the armed services. Later, it was extended and used as a dairy. Surecast have been manufacturing from the premises for about 15 years, specialising in high quality metal castings and components. A couple of minor extensions have been added in recent times, but essentially the buildings haven't been altered externally to any appreciable extent for a generation.

#### 4.0 ACCESS AND PARKING

#### 4.1 Access

Provisional discussions have been held with the County Highways Officer. They have indicated that London Road has adequate capacity to serve the new development. Access should be from a single junction. National and County standards indicate a road of 5.5m. width with 6m radius bellmouths would be required with 1 footpath and adequate turning. They will require 90 x 4.5m sightlines commensurate with a 30 mph speed limit in both directions. This will necessitate removal of part or all of the frontage hedge, but can easily be accomplished on the site without involving third parties.

- **4.1.1** The County Highway Officer indicated that no infrastructure or road improvements would be required to serve a development of approximately 50 units; beyond that there would be the possibility of a turn right lane from London Road being required.
- **4.1.2** The County Highway Officer has been consulted on the internal layout, and his comments will be taken into account in the preparation of detailed proposals.

#### 4.2 Parking 2001 Local Plan Table 5 maximum standard, policies AT9 & AT2

#### **Suggested provision**

1 bed flats	125%	(Occupancy typically 1)
2 bed flats	150%	(Occupancy typically $1-2$ )
2 bed houses	150%	(Occupancy typically $2-3$ )
3 bed houses	200%	(Occupancy typically $2-4$ )
4 bed houses	200%	(Occupancy typically $3-6$ )

**4.2.1** Additionally, informal provision for visitors and delivery vehicles/tradesmen should be provided at minimum rate of 1 space per 5 dwellings, according to Kennet Local Plan Requirements. Final agreement on numbers will take into account its quality (for instance, tandem parking can only be allocated to a single unit; carports are less likely to become available due to storage) and convenience. It is accepted the level should be above Government advice of 150% overall, and the Council have advised the overall maximum provision should be 200%.

### 5.0 EXISTING SITE AND CONTEXT

#### 5.1 Location

The site is located on the northern side of the London Road approximately 1 km from the edge of the Town Centre on the north eastern side. London Road is a major route which supports bus, cycling and pedestrian facilities. There are good links to the Kennet & Avon Canal to the south. The front of the site is overlooked to some degree by an undistinguished 3 storey block of flats. London Road is very wide and the uses on either side are very mixed, with housing not representing a majority of development.

#### 5.2 Site Description and Context

- **5.2.1** The site comprises 1.07 hectares and is currently wholly occupied by Surecast Mills Limited. This commercial organisation is involved in the casting and machining of specialist metal castings for a variety of industrial and commercial users. The site is occupied by a range of buildings. Occupying over 25% of the total site area in the centre back of the site is a steel framed factory building described in the valuation report as being of typical 1930's construction and it "has been extended over the years to form a ramshackle arrangement of industrial warehousing and factory building to poorer quality and aging outbuildings". There are substantial brick elevations but significant parts are clad with a variety of old industrial corrugated cladding. Parts of the structure are full height internally but other parts contain levels of accommodation on at least one side and the overall height to the ridge is approximately 12 metres. There are 3 significant satellite industrial buildings, mainly profile metal clad and at heights varying from approximately 3 to 6 metres.
- **5.2.2** To the front of the site is a single storey white, flat roofed administrative building composed largely of temporary buildings, and in front of that a parking forecourt. Most of the perimeter of the site is concreted over to provide access for plant and machinery with appreciable grass areas only at the front of the site.
- **5.2.3** The total footprint of existing buildings is 0.388 hectares (i.e. a site index of 35%) and the existing accommodation is described in the valuation report as follows:

Туре	Use	Sq m	Sq ft	
Offices	Admin	184.5	1,986	
Industrial	Foundry and light industrial	3455.0	37,188	
Storage Buildings	Various ancillary storage	262.4	2,824	
External Workshops	Various light industrial	681.8	7,339	
TOTAL		4,583.5	49,337	

#### **EXISTING ACCOMMODATION SCHEDULE**

# All measurements are approximate and in accordance with the RICS/ISVA Standard Code of Measuring Practice.

- **5.2.4** There are no buildings or structures of architectural merit, on the contrary, they are poor, bulky and unsightly and their removal will be an environmental improvement.
- **5.2.5** There is a significant group of trees in the southern corner of the site which should be retained, a significant offsite coniferous screen in the south east corner, sporadic mainly

offsite trees along the northern and eastern boundaries, and a group on the north west boundary to Devizes Garden Trading Estate. To the frontage is a mature maintained hedge about 2.5m high.

#### 5.3 Contamination

The site has been in continual industrial usage for at least 60 years. It is likely that contamination exists. The Local Authority and Environment Agency have no information, and to date no proper environmental audit or ground investigation has been undertaken. Subadra Ltd have been appointed to carry out a full detailed site investigation supported by laboratory analysis and submit a detailed report on remediation which is due to be received shortly.

#### 5.4 Environs and Architectural Context

Immediately to the west is the low density Roundway Park development which has the character of an early post second world war speculative residential development. There is an old lodge and impressive stone gate pillars at the entrance to this development, and the land was originally part of the parkland setting for Roundway House.

#### 5.5 Roundway Park

Most of the 11 properties bordering the site are two storey houses but there are also two bungalows – Sycamore Lodge Bungalow and No 1A. These properties together with The Sycamores and Edelweiss are fairly close to the boundary. Fortunately there is established planting along most of the boundary between these properties. The objective should be to improve on this. For this reason the trees will need to be retained and new development carefully sited. The other properties (1-7 Roundway Park) sit further away from the boundary. Nevertheless careful siting will again be required in order to maintain reasonable privacy. It is fortunate that the residential properties lie to the south or west of the site, which means that their sunlight and daylight should not be materially affected.

#### 5.6 Adjoining Commercial Development

- **5.6.1** To the east of the site is a large facility used by Jewsons, including a large bow roof steel framed warehouse over-clad in rusty corrugated iron. This juts into the site and forms a major visual intrusion. This building is again very visible from the London Road. To the north of that building is an open yard occupied by John Dere Ltd., who deal in commercial and farm machinery. Associated industrial buildings are spaced at a reasonable distance from the north west boundaries, but the intervening land may be subject to some disturbance. The two concerns form part of the Devizes Garden Trading Estate which occupies approximately a further 5 hectares of land which is retained for commercial purposes in the Local Plan.
- **5.6.2** The estate includes many large scale buildings and extensive service yards. Clearly, the commercial activities may impose some constraints in terms of noise and scale. These factors will need to be taken into account possibly by siting buildings gable end on where possible and constructing larger scale 2.5 or 3-4 storey buildings. Noise consultants have been appointed and their recommendations will be taken into account.

#### 5.7 London Road Environs

**5.7.1** In the wider context, London Road is characterised by a mix of uses reflected in a wide range of building designs and scale. Institutional uses are/were perhaps dominant and reflected in large scale buildings such as at Le Marchant Barracks (to be converted to residential) and the police/fire headquarters. The other major use is employment which tends to spread along the western side of London Road in a northern direction. In more recent years retail uses have developed along the north eastern side – including a food store. Elsewhere building

ages range from 19<sup>th</sup> century to 1990's. and are mostly residential, this is particularly so on the eastern side of London Road.

- **5.7.2** Between the site and the town are significant areas of open space that provide amenity and recreational facilities (Devizes Sports Club). In addition the Kennet and Avon Canal runs behind the properties on the eastern side of London Road providing further recreational and amenity opportunity.
- **5.7.3** Immediately opposite the site is the Moonraker's Development, a 1970's housing development consisting of 2 storey terraced houses and garage courts backing on to the Kennet and Avon Canal, with undistinguished 3 storey blocks of flats along the London Road frontage.

#### 5.8 Sustainability and Environmental Factors

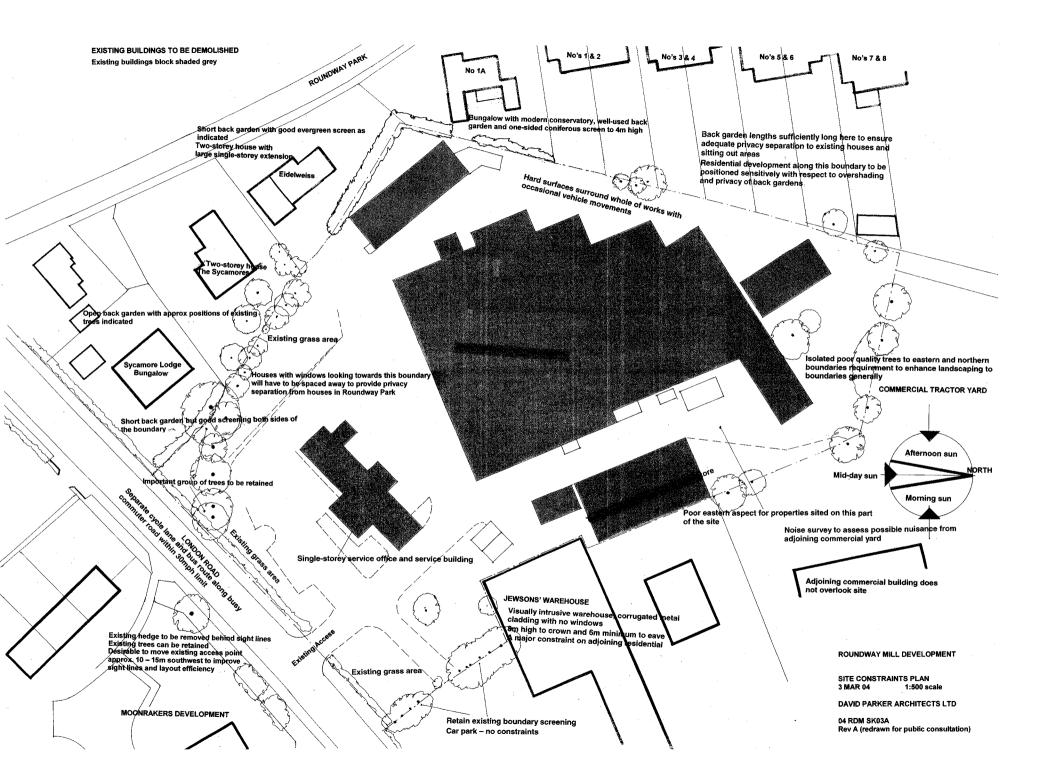
- **5.8.1** The site is located within 1 km from the edge of the town centre. It is located on a major access route that has a bus service and cycle way. Consequently the site has good access to the town centre and the community facilities therein. More particularly the site is well related to the new school and recreational facilities proposed at the Quaker's Walk site and existing recreational facilities provided by Devizes Spots Club and the Kennet and Avon Canal. It is also close to a new supermarket and the largest employment area in Devizes.
- **5.8.2** The existing buildings are unsightly and the current use causes environmental problems.
- **5.8.3** The site is therefore in a very sustainable location and its redevelopment in a manner that reflects the character of the area and the site constraints, would also conform with sustainability objectives.
- **5.8.4** On transport, space could be provided on the frontage for a lay-by bus stop. Cycling should be encouraged. A good system of footpaths is provided, separated from the roadway where possible. The road has an alignment designed to severely restrict traffic speeds and this will be reinforced with calming measures and the use of varying hard surfaces to restrict traffic speeds to below 20kmh.

#### 5.9 Archaeology

We have consulted the County Archaeologist and his response is in the Appendices. There are not likely to be archaeological remains.

#### 5.10 Noise and Nuisance

Environmental Acoustics (Noise Consultants) have been appointed in consultation Kennet Environmental Health, and have carried out an assessment of noise related issues, and the report is available, with the relevant parts being included in Appendix 5. In recent years the existing use has given rise to environmental complaints, mainly about noise, with respect to residents in Roundway Park.



#### 6.0 PUBLIC CONSULTATION, SOCIAL, AMENITY AND INFRASTRUCTURE CONTRIBUTIONS

**6.1** The following is a summary of Local Authority comments on a very preliminary concept sketch 03 RDM SK02 which showed slightly more units than now contemplated.

- The overall concept was thought to be appropriate and innovative.
- The mix of unit types proposed was likely to be acceptable.
- The proposals were thought to exhibit some symptoms of overdevelopment excessive size of some parking courts, inadequate provision for boundary screening.
- Perhaps inadequate levels of parking provision in some areas.
- Concerns about proximity of some houses to retained trees.
- Inadequate children's play area which should be 400 m<sup>2</sup>.
- Concerns about noise from neighbouring commercial activity.
- Concerns about amenity levels for some units in relation to gardens, outlook and proximity of parking.

There has been be a public consultation including an exhibition to which interested parties, commercial and residential neighbours were invited. It followed the format suggested by the Local Council with an afternoon exhibition followed by an evening public meeting and discussion. Comments were invited and will be taken into account in the preparation of a detailed planning application.

#### 6.2 Public Exhibition and Meeting

A public exhibition was held at Surecast offices between 2.30 and 6.00pm on Wednesday, 24th March. The exhibition was re-assembled at Devizes Sports Club with an open meeting from 7.00pm to 9.00pm. All the statutory consultees were invited, all District Councillors and a mail drop was carried out to all neighbours either adjoining or close to the site, about 200 in all. The meetings were advertised in the local papers. About 60 people attended both events. The following Council Officers attended for part of the time; Carolyn Gibson, Ed White, Tim Guymer and Ian Posslethwaite. The following is a summary of the concerns raised, what we are doing about them and the Council's response.

	CONCERN	DEVELOPER'S PROPOSAL	KENNET DISTRICT COUNCIL'S RESPONSE
1.	<b>Traffic Congestion</b> on London Road, particularly morning rush hour. No white lines on London Road and 40 mph speed limit is not adequately enforced.	Consultations have taken place with County Highways, who have advised that no traffic survey is required. No junction improvements will be necessary up to approximately 50 units, that capacity is adequate.	Consultation between Wiltshire County Council (as Highway Authority) and Kennet in relation to the question of traffic congestion in Devizes generally is ongoing. These problems cannot be addressed through the Roundway Mill Planning Brief alone.
2.	<b>Parking:</b> Will adequate parking be provided to prevent congestion on site and avoid off-site parking? Some expressed views that 176% as proposed was not	Layouts have experimented with levels of parking between the PPG3 advice of 1.5 spaces/dwelling and the council maximum standard of approximately 2.0 spaces. All family units will have at least a	The potential conflict between reducing the number of parking spaces on a site as advised in PPG3 and residents' aspirations is acknowledged. The Brief rightly seeks a balance

	adequate and levels should be 200% (2 spaces per unit).	garage/carport plus one further allocated space. Other provision will be made at least at the rate set out in Table 5.2. Parking provision is being slightly increased. The design proposals will try to contain car dependence by promoting other forms of transport, homeworking, and community interaction as described elsewhere in the Brief.	between the maximum standards in the Kennet Local Plan and PPG3 advice to ensure there is no conflict with local or national policy.
3.	Education & Community Facilities: The strain on school capacity, and the lack of community facilities, particularly for the young, was an issue raised by several people.	There will be "planning obligations" by which the developer will make substantial one-off payments to offsite infrastructure including Education and Recreation. A community facility is proposed as part of the development.	The Roundway Mill Planning Brief nests within the wider Devizes Strategic Development Brief. The Strategic Brief proposes that each of the new large housing sites in north Devizes contribute towards expanding the number of primary and secondary school places in the town by providing a new primary school within the Quakers Walk site and extended classroom space at the secondary school.
4.	Crime & Security: Widespread concern about petty crime, burglary and security. Comments about breakdown of policing late at night in centre of Devizes. At least one person was concerned about houses directly fronting the streets without front gardens.	The layout is being designed to promote a sense of community with high levels of interaction and surveillance provided by overlooking windows. Parking courts should be overlooked and designed to discourage unauthorised access. Access to shared and private areas will be protected in accordance with police advice (who will be consulted) and the project designed to accord with the "Secured by Design" initiative.	Kennet Local Plan para 1.19 includes the need to create a well used and attractive public realm for example by taking into account issues such as lighting, overlooking and a mix of uses to ensure good natural surveillance of public areas. The principle that design of the scheme should take this into account is covered in the Planning Brief section 7.5.
5.	Design Density & Height of Buildings, and Privacy: There was consensus that the sketch design as illustrated in the artist's impression was good and appropriate in terms of visual appearance and quality. 3 or 4 people expressed concerns about the height of the buildings	Initial trial proposals were at about 60 units. This has been progressively reduced towards 50 units which we believe is sustainable and appropriate. The layout, design and height of buildings is being tested against the Council's design standards. The context and relationship with neighbouring development, particularly Roundway Park, is	Kennet were concerned about the density of development when earlier layouts were discussed. The Planning Brief now refers consistently to about 50 houses, which although greater than the number originally identified in the Kennet Local Plan (about 30) is still within PPG3 guidelines for housing

	and a couple thought the density might be excessive. One was concerned about the provision of a 3 storey block at the front of the site.	being tested and further design modifications are expected. The privacy of residents in Roundway Park will be protected by a combination of distance and boundary landscaping.	densities on 'urban' sites. The final numbers can only be decided when a detailed planning application is submitted. Policy PD1 of the Kennet Local Plan includes reference to scale, massing and height and the need to protect residential amenity. The treatment of boundaries and the height of new housing in relation to existing bungalows is addressed in the Brief at section 7.2.
6.	<ul> <li>Wildlife &amp; Ecology:</li> <li>Concern expressed about retention of trees and boundary screening.</li> <li>A couple of people expressed concern about wildlife, particularly bats and badgers.</li> </ul>	Design accommodates retention of trees and boundary screening where it exists. New planting will be included. The existing frontage hedge which will have to be removed to facilitate safe access will be replaced on a revised slightly set back line. The site is extensively hard surfaced with virtually no cover for wildlife. There is no evidence of badgers and a search	It is important that existing trees and hedgerows within the site and on the boundary of the site are retained. The 'Site Constraints Map' included in the Brief identifies important groups of trees to be retained and areas of trees to be enhanced, section 7.6 on page 17 also touches on this.
7.	<b>Contamination/Asbestos:</b> A couple of residents expressed concern about the disposal of asbestos and asked for it not to be undertaken during an East wind. Another gave information about possible contamination remaining from the flax mill operation.	has revealed no evidence of bats. A full soils investigation has been commissioned and will be taken fully into account together with the remediation recommended. Asbestos known to be present is the less dangerous brown asbestos in roofing sheets, nevertheless a full survey will be made and all asbestos will have to be disposed of by a licensed subcontractor.	Concerns about the presence/removal of asbestos will be addressed through the appointment by the developers of a licensed contractor.

#### 7.0 STATEMENT OF DEVELOPMENT AND DESIGN PRINCIPLES

#### 7.1 Sustainable Design Principles

- **7.1.0** The site is in a relatively sustainable location, permitting a higher density of development than would otherwise be the case.
- **7.1.1** Housing will be designed to take account of all statutory government advice on reducing energy consumption. High standards of insulation, and heating controls will be required. So far as is possible, all units will be designed with SE to SW aspected living spaces, gardens and balconies, to maximise solar gain and energy efficiency. Developers will be encouraged to follow government initiatives in reducing carbon loading by considering the inclusion of heat recovery systems, condensing boilers or solar heating.
- **7.1.2** Affordable Housing and an equipped play space will be provided together with a community facility which will consist at least of a community room with services suitable for a variety of community uses. This is to encourage community inclusiveness and to reduce the need to travel off site.
- **7.1.3** Casual and adult recreation provision, education and sustainable transport schemes will be met by a financial contribution towards off-site provision.
- 7.1.4 Alternative forms of transport will be encouraged in the following ways:
  - Excessive car ownership will be discouraged by a reduction in the parking standards.
    - Separate cycling/footpath network will be provided wherever possible. Flats will be provided with separate secure cycle storage and vertical cycle storage racks will be provided for private garages.
- 7.1.5 Provision will be made for waste recycling in accordance with the drafts Wiltshire and Swindon Waste Local Plan.
  - Policy 10 Waste Audits.
  - Policy 14 Provision of Recycling in New and Refurbished Developments.

This will include the provision of communal facilities for recycling.

#### 7.2 Scale, Height and Density of Development

7.2.1 Density:

As a previously developed site, well related to the town centre, it can accommodate the higher range of densities recommended in PPG3. This suggests a mid-range density development of 30 - 50 dwellings per hectare, but states that higher densities in sustainable locations close to the town centre will be appropriate.

7.2.2 Scale:

The scale of development on land adjoining Roundway Park should be constrained to twostorey in character to respect the existing properties.

- 7.2.3 Development adjoining London Road may be acceptable at three storeys.
- **7.2.4** In the central area of the site, away from sensitive boundaries three or four-storey development might be accommodated providing it can be demonstrated it relates well to the surrounding pattern of existing and proposed development, and offers an overall reduction in the bulk of buildings existing on site presently.

#### 7.3 Townscape and Landscape

- **7.3.1** The character of the London Road between the site and the town centre is typified with hedges and trees to the frontages. It is important to maintain this character.
- **7.3.2** The existing site is almost entirely covered by buildings and hard surfaces. The surrounding development is very mixed and offers no strong framework to inform the proposed design. The development can therefore to a certain extent set its own standard and character. However, there is an opportunity to provide a dramatic qualitative environmental improvement and the proposed design should make a positive contribution to the townscape, and respect and compliment the existing fabric and character of Devizes.

#### 7.4 Layout, Servicing, Access and Road Safety

- **7.4.1** There shall be a single junction providing a single spine road access serving the development. The layout should be designed to constrain traffic speeds to a minimum and provide safety for pedestrians and children.
- **7.4.2** The design should make provision for and promote pedestrian cycle use as much as possible. A good system of footpaths should be provided, separated from the roadway where possible, convenient, and designed so that the layout is readily understandable, unambiguous, and attractive.
- **7.4.3** Access for service vehicles shall be provided to adoptable standards including adequate turning areas for service vehicles. Carry distances for deliveries to front doors should be kept to a minimum. The layout should be able to accommodate parked service vehicles without causing blockages. Access to communal facilities such as waste recycling should be clear, safe, and convenient.
- **7.4.4** Car parking should be provided at an average ratio of 1.75 spaces per residential unit. This is a standard above that recommended in PPG3 but below the maximum standards of Kennet District Council, and this compromise provision figure has been carefully considered in the light of comments made during public consultation.

#### 7.5 Attractive and Safe Public Realm

- **7.5.1** Community identity should be reinforced through the design quality of the scheme and provision of facilities to encourage interaction.
- **7.5.2** The development should include sufficient, convenient, safe and protectable car parking provision.
- **7.5.3** Public areas should be overlooked to reduce opportunities for breaking and entering to a minimum. Residential curtilages should be defensible so far as is possible, and the detailed design should prevent or at least substantially discourage unauthorised access to such areas as; parking courts, rear garden access paths. The layout should embrace the principles of SBD and take into account the comments of the Police Liaison Team.
- **7.5.4** There should be good levels of amenity lighting to the public realm to facilitate safety and convenience, but the lighting should be designed in such a way as to reduce potential nuisance to individual houses; e.g. poorly positioned light standards shining into bedroom windows.

#### 7.6 Landscape Proposals

- **7.6.1** The proposals should incorporate a professionally designed soft and hard landscaping proposal of high quality. Opportunities should be taken to introduce tree and shrub planting where they are sustainable to provide a rich visual environment, at the same time respecting the requirements of maintenance and potential overshading. The landscaping should compliment the design of the buildings.
- **7.6.2** The significant group of trees, covered by a TPO in the southern corner of the site should be retained. Additionally, all significant boundary trees should be retained. Isolated trees on the eastern and northern boundaries should be retained wherever possible and screening enhanced with new planting.
- **7.6.3** Existing significant trees, wherever possible, should make a contribution to the street scene and, for example, not be confined to rear gardens where possible. There should be an appropriate distance between each crown spread and new buildings to ensure that existing trees are not damaged.
- **7.6.4** The frontage hedge of the site will need to be removed in part to provide adequate visibility at the junction. Appropriate replacement planting including a new hedge and tree planting will need to be included in the development proposals.
- **7.6.5** The existing facility used by Jewsons juts into the site forming a major visual intrusion. Any opportunity to screen this building or to mitigate its impact will be beneficial to the development.
- **7.6.6** The design should avoid the provision of low grade, heavily over-shadowed or awkward shared amenity spaces.
- **7.6.7** Soft and hard landscaping should be used to maximise the safety, usability, and attractiveness of the equipped children's play area.

#### 7.7 Historic Features

- **7.7.1** There are no buildings or structures of architectural merit. The whole site can be cleared of existing structures and hard surfaces before development commences.
- **7.7.2** There are no known architectural features or finds from the site. Archaeolgical consultations have established there is no archaeological interest on or close to the site, and therefore no archaeological investigation is required as confirmed in Appendix 2.

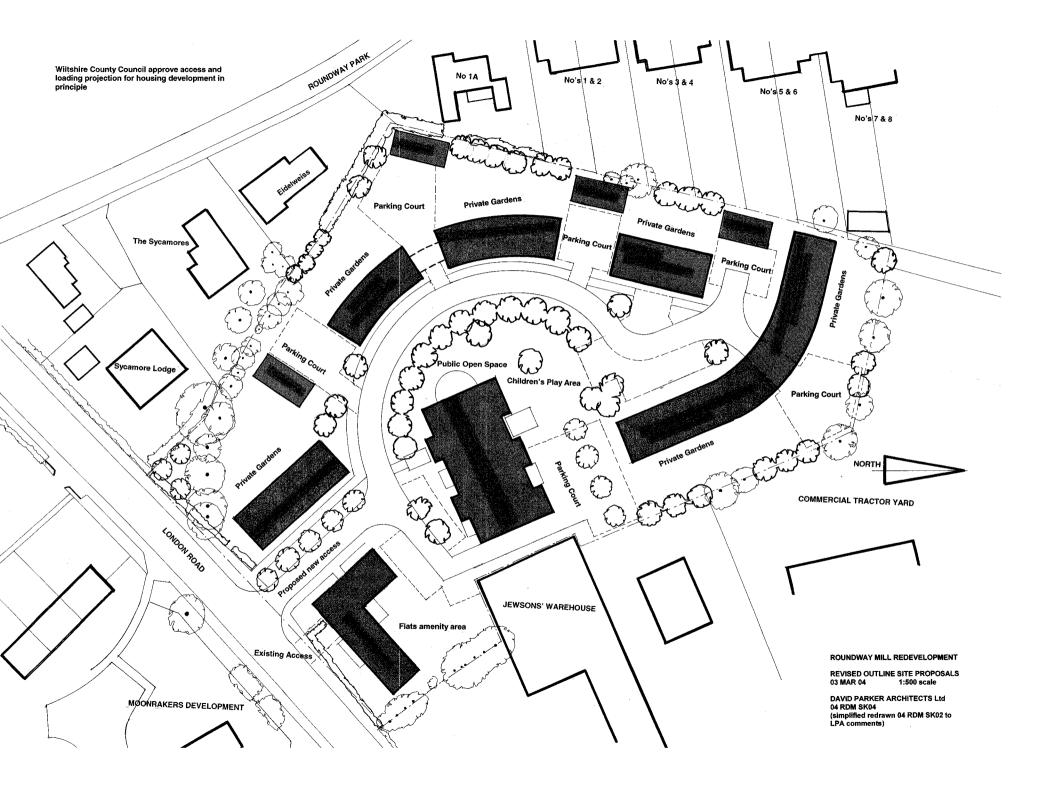
#### 7.8/ Elevational Treatment and External Materials

- 7.9
- **7.8.1** There is no significant design context for this site, and in early discussions it was agreed that either a vernacular or contemporary approach might be justified.
- **7.8.2** After consultations, however, it is felt that a vernacular design at least incorporating traditional forms and materials would be more likely to be acceptable to neighbours, and more attractive to developers and potential purchasers. It is therefore proposed that elevational treatment will draw upon traditional forms found within Devizes and in recent new development around Devizes in terms of its scale, roof spans, roof pitches and elevational treatment.
- **7.8.3** It is suggested that a pallet of traditional facing materials should be considered. Proposals which are too monolithic or bland should be avoided. Materials selected will probably

reflect the historical mix of facing materials in Devizes, but proposals should avoid the excessive mixing of different materials, avoid pastiche, and seek to provide a visual quality which pleases and delights without overwhelming the senses. Figures 5 and 6 show artist's impressions of an illustrative proposal.

#### 7.10 Residential Amenity

- **7.10.1** The equipped children's play area, targeted towards younger children, should be located centrally within the site, with footpath access to the majority of units, overlooked for supervision but as open to the sun as possible.
- **7.10.2** All units should be carefully sited and orientated to avoid unacceptable overlooking and to maintain reasonable privacy of existing residents.
- **7.10.3** The residential amenities of the existing residents in Roundway Park are to be respected. In this respect it is to be noted that 1A in Roundway Park and Sycamore Lodge are bungalows while Sycamores and Edelweiss are fairly close to the site boundary. The relationship between these properties and the site needs to be dealt with sensitively.
- **7.10.4** Potential noise and the scale of adjacent commercial properties needs to taken into account through the siting and orientation of new buildings to protect the amenity of future residents.
- **7.10.5** Established planting and trees on established boundaries shall be retained and enhanced wherever appropriate to improve the amenity of adjacent residents.



#### 8.0 ILLUSTRATIVE DEVELOPMENT PROPOSALS

This section and Figures 5 and 6 give information about how far sketch proposals prepared for the site owners have progressed. The details have not been agreed with Kennet District Council and it is anticipated some amendments will be required to make the proposals acceptable.

#### 8.1 Illustrative Mix introduction

At the outset, the number, type and mix of residential units proposed is not fixed. A proposal is being tested in accordance with the table in 7.3 below, which has only been produced after a thorough consideration of the site constraints, and of examples of other local medium to high density schemes, locally and nationally.

#### 8.2 The Provision of Flats

Land maze have carried out considerable market research locally before arriving at these conclusions, supported by their experience of such development in the Home Counties.

Given the proportion of smaller units and flats, together with a tendency towards smaller households, the occupancy rates in table 6.2 represent a safe level at which to plan amenity and parking provisions.

#### 8.3 Demand for Good Quality Flats

A potential strong demand for flatted development in Devizes has been identified. There is very limited recent flatted development in Devizes, and what has been attempted it is felt is not of sufficiently high quality to be as attractive as possible to potential occupiers. Shortcomings include;

- Unimaginative, cramped and poorly laid out living space
- The lack of a second bath or shower room in 2 bedroom flats.
- The lack of personal attractive sitting out space which could be provided either in the form of balconies or private terraces.
- Unimaginative design and poor setting.
- The lack of secure parking provided in a convenient manner.

Taking advice from local agents, as well as looking at the demographics of Devizes, it became clear that there is a predominantly younger market, which at present is not catered for. The majority of new developments have excluded flats. It is proposed that well designed flats with a sense of place would be suitable, as well as potentially designing in a leisure facility helping to provide the development with social "glue" and interaction between its residents.

#### 8.4 Character and Massing of Layout

A development which has an urban rather than suburban character is proposed. The Architect has been influenced by consideration of recent local residential large-scale development, including Brickley Lane and the hospital site. The existing Mill buildings create a strong visual reference point for the site, and it is suggested that if sensitively handled, 3 or even 4 storeys of development might be accommodated in the central area of the site providing the overall scale does not exceed that of the existing structures, and providing the quality of the design is high. A significant proportion of the site may have accommodation on the second floor, either in the form of 3 storey development or accommodation contained wholly within the roof slope. Development adjoining Roundway Park should be 2 storey in character to respect identified consensus and constraints.

#### 8.5 Spatial Design and Internal Views

The whole site will be served by a single spine road. This will follow a sinuous curved alignment with houses on the outside of the curve and in many cases adjoining the back of footpath. This would be set off behind an avenue of trees on the inside of the curve, adjoining the open space. Development should be made up generally of short terraces of fairly simple building form with steeply pitched roofs. Visual reticulation can be provided by frequent changes of direction or the introduction of significant gables and key visual points. The layout will provide sequential views through and around the site with the spine road linking a series of public or semi-private open spaces.

#### 8.6 External Design

The design and appearance of the housing is shown illustratively in two artist's impressions. At this stage it is likely that the housing will follow vernacular form and use traditional appropriately sourced external facing materials, and that the majority of glazing elements an external details should be domestic in scale and character, with brick elevations predominating, some use of render and plain clay tiled roofs with some slate.

The Architect has carried out a study of local vernacular architecture both in relation to the historic core of Devizes and the better quality modern residential development in the area.

#### 8.7 ILLUSTRATIVE PROPOSED DEVELOPMENT MIX (this is the mix achieved in the latest sketch proposal 04 RDM SP11 which is not itself part of this Brief)

Pa	it of this brief			
No. off	No. of Storeys	Social Housing Description	Nett Floor	Parking
			Area	
9	3	2 bed flats	61	9 spaces $+ 4$
				visitors
5	2	2 bed cottages	76	15 court
3	21/2	3 bed cottages	91	
17			1202	28 (140%)
	Housin	g for Sale		
4	2	2 bed cottages	76	8
6	21/2	3 bed town houses	110	12
8 3	21/2	4 bed town houses	140	16
3	3	4 / 5 town houses	150	6
21			2534	42 (200%)
	Flats	for Sale		
4	31/2	1 bed flats	50	
10	31/2	2 bed flats	72	25 (156%)
2	31/2	2 bed penthouses	120	
16			1160	
	54 Un	its Total	4896	95 (176%)

#### 8.8 Social Housing

It has been agreed that the site will provide a minimum of 30% of the residential units as Social Housing. This will take the form of houses and flats to be owned by a registered social landlord nominated or agreed with the District Council. In the consultative mix above, a block of nine 2 bed flats and a terrace of eight 2 or 3 bed cottages (17 units in all) have been proposed.

In view of the high cost of demolition and remediation of contamination, it is proposed there will be no low-cost housing on top of the social housing. However, a relatively high proportion of small units will be provided suitable for first time buyers.

#### 8.9 Community Facilities

A community facility will be provided in the main building adjacent the children's play area. At this stage the plans for this are not fixed but it is likely to include a large community room which could be used as a crèche facility supported by appropriate facilities. All residents would buy into the facility and a management company set up to run the open areas of the estate would assume ownership and be responsible for running and maintaining it. We are considering other uses; for instance it could be used by the management committee for the estate and hired out to societies in the evening. Toilets and a small kitchen would be included. This facility is responding particularly to the identified shortage in the Area Plan for certain types of community facility, and the need to empower local communities to improve their quality of life.

#### 8.10 Landscaping and Shared Amenity Space

- **8.10.1** Using the assumed occupancy rates applied to the starting mix, an equipped children's play space of approximately 400m<sup>2</sup> would be required to comply with HC35 (a). This should be located fairly centrally to the site, with footpath access to the majority of units, overlooked for supervision but as open to sun as possible. The provision should be targeted towards younger children, with the rest being used to support the Community Facilities. It is believed a high proportion of flats will ensure a high proportion of childless households.
- **8.10.2** Consideration will also be given to providing a high quality shared private, or public open amenity area including provision for sitting to serve the flats. It is submitted that it is not appropriate to try to provide separate gardens for the flats, and that the design should avoid the provision of low grade heavily overshaded awkward shared amenity spaces.
- **8.10.3** The outline proposal includes an external amenity area of about 200m<sup>2</sup> for the social flats sheltered from the road by the flats and which will attract morning sun. The combined area of the CPA and POS which wraps round the end of the Main Block is approximately 650m<sup>2</sup>. All residents would have access to the community facilities which will provide some high quality internal amenity. These total about 1000m<sup>2</sup>. Each of the flats at first of second floor will have a private balcony and the ground floor flats types will have small private patios of about the same size.

#### 8.10.4 Private Amenity Space

Gardens to private houses will generally be 10.5m long minimum and the majority of units will have back gardens of at least  $50m^2$ . However, consideration may be given to reducing this for smaller units if the setting of the houses is attractive, and what private amenity space is provided is of a high usable quality.

With respect to the flats, consideration will be given to providing balcony areas for all first floor flats and above. Balconies will be designed with adequate side screening, should be of a sufficient size for a small table and chairs for outside eating, be sufficiently commodious to provide some area for potted plants and the layout and design should provide for aspect, airiness, and sun wherever possible.

#### **D W PARKER RIBA** For David Parker Architects Ltd

# Appendix 1

Summary of the relevant policies in Kennet District Local Plan 2011.

#### HC12 ROUNDWAY MILL

The Local Plan allocates land for housing on a 1.07 ha site at Roundway Mill, Devizes as shown on Inset Map 1.

#### PD1 DEVELOPMENT AND DESIGN

#### A. General Application

A high standard of design will be expected in new developments, extensions or alterations to existing buildings, changes of use and in proposals affecting the landscape and environment, to ensure that the character, appearance and environmental quality of the Kennet area is maintained or enhanced, and to promote safety and compatibility between adjoining land uses.

#### B. Considerations

In order to achieve high standards of design, all development proposals should adequately address the factors listed below, where they are relevant to the development under consideration:-

- 1) Sustainable design principles;
- 2) Scale, height, massing and density of development;
- 3) Relationship to townscape and landscape context and related ecology;
- 4) Layout, servicing and access arrangements, and road safety;
- 5) How the development contributes to the creation of a well used, attractive and safe public realm;
- 6) Landscape proposals;
- 7) Relationship to historic features;
- 8) Elevational treatment;
- 9) Building materials, colour and detailing; and
- 10) The impact on residential amenity, including that caused by reason of noise and disturbance.

#### PARA 1.19 DEVELOPMENT BRIEFS

Planning Applications for developments on the key development sites (*such as Roundway Mill*) will be expected to be supported by a Planning Brief, prepared in consultation with the Local Planning Authority. The Planning Brief should include the following elements:-

- 1. Appraisal of the site's context and setting;
- 2. Review of relevant policies and guidance;
- 3. Indication of the measures proposed to meet the impact of the development to be provided as Planning Obligations and details of any mitigation measures required;
- 4. Statement of Design Principles, as described in paragraph 1.21, including detailed design proposals, where appropriate to the scale of the proposed development; and
- 5. Details of public consultation (to include consultation with part owners of allocated mixed-use sites) where such consultation has been undertaken.

#### HC2 HOUSING ALLOCATIONS

To meet the strategic housing requirements of the District the Local Plan allocates land for housing in the locations including:-

Roundway Mill, Devizes about 30 dwellings

#### HC3 RE-USE OF PREVIOUSLY DEVELOPED LAND AND BUILDINGS

Priority will be given to housing development which re-uses previously developed land and buildings within existing settlements provided that the proposed development does not undermine the Plan's wider objectives to develop balanced communities and promote employment opportunities in the rural areas. The Plan's target for the number of new homes provided in this way is 50%.

#### HC5 NET HOUSING DENSITY

Within the Limits of Development of Devizes, Marlborough, Market Lavington, Tidworth, Ludgershall and Pewsey the net density of residential development on large sites should be at least 30 dwellings per hectare, with the exception of housing sites that are allocated for a lower net density because of site constraints.

Residential development with a net density greater than 30 dwellings per hectare will be sought where:-

- a) the location is close to a concentration of employment, a Town Centre or a public transport service where higher densities can contribute to a more sustainable pattern of development or
- b) the development provides housing for special local needs such as small units for single people or dwellings for elderly or disabled people.

To achieve densities greater than 30 dwellings per hectare in sustainable locations, (ie criteria a), the amount of open space required on each site by policies HC34 and HC35 may be reduced in consultation with the Local Planning Authority. When deciding whether any such reduction in open space on the site will be allowed, the Local Planning Authority will take account of the extent and position of existing open space in the locality, to ensure that overall provision for occupiers of the new development is acceptable. A high standard of design in accordance with Policy PD1 remains essential.

#### HC7 HOUSING LAYOUT

Residential development that, is in accordance with other policies and proposals of the Plan, will be permitted where the proposal promotes sustainable development objectives by:-

- a) providing a network of streets, cycle paths and footpaths within the site which are linked to existing streets, cycle paths and footpaths to reduce the need to travel and reduce the distance travelled by private car;
- b) connecting to an existing public transport route to ensure the site is served by alternatives to the private car;
- c) ensuring public and private space is designed to encourage social/ community interaction;
- d) including a mix of uses and house types to introduce variety and interest in the street scene;
   e) using topography and aspect of the site to maximise solar gain and reduce energy consumption;
- e) using topography and aspect of the site to maximise solar gain and reduce energy consumption; and
- f) ensuring that natural resources and materials, which exist throughout the life of the development, are re-used and re-cycled whenever possible.

The size and location of the site will be a consideration when assessing the degree to which a site can incorporate each of the elements listed above.

#### HC8

#### POTENTIAL IMPACT OF DEVELOPMENT

Proposals for housing development on each of the sites listed in Policy HC2 will need to address the potential impact of development on transport (including walking, cycling and public transport), local communities and amenities (including affordable housing and recreation space), education, services and locally important natural features in accordance with policies PD1, AT2, HC30, HC34, HC37, HC42 and HC43 and other relevant detailed policies of the Plan. Additionally proposals at Quakers Walk, Roundway Mill, the former Le Marchant Barracks, Naughton Avenue and at the North Gate/ Wharf /Devizes Hospital will need to take into account the potential cumulative impact of these proposals, which are in close proximity, to each other of the listed services and amenities.

#### HC28 AFFORDABLE HOMES TARGET

The Council will actively pursue the target of providing an additional 1575 affordable homes within the District by seeking an appropriate element of affordable housing:

- a) on allocated housing sites;
- b) on any housing site in Devizes, Marlborough, Tidworth, Ludgershall, Pewsey and Market Lavington involving 25 or more dwellings or 1 hectare of land (irrespective of the number of dwellings) where there is evidence of local housing need; or (applying to Marlborough only) where there is evidence of acute pressure for affordable housing, on sites involving 15 or more houses or 0.5 hectares of land (irrespective of the number of dwellings);
- c) on any housing site in the rural areas in accordance with Policy HC32;
- d) through the application of an exceptions policy in rural areas; and
- e) the acquisition of existing vacant property, small infill/conversion schemes and the redevelopment of existing sub-standard housing.

In pursuing the overall target the Council will seek to negotiate 1375 subsidised affordable homes and 200 low cost market housing within the Plan period 2000 to 2011 to reflect the nature of local housing need in the District.

#### HC29 DEFINITION OF AFFORDABLE HOUSING

Where an element of affordable housing is included in a planning application, in accordance with the policies of this Plan, the type of affordable units provided will need to comply with the Plan's definition of affordable housing. For the purposes of this Plan, affordable housing is defined as:

- a) subsidised housing provided by a Registered Social Landlord, village trust or similar body which has the benefit of Social Housing Grant either for letting at affordable rents or for sale on a shared ownership basis; or
- b) low cost market housing which is offered for sale at or below the lower quartile of prevailing market values, provided the proposed sale price is affordable based on average incomes at the time of application.

#### HC30 AFFORDABLE HOUSING ON LARGE SITES

Where a local need has been established, the Local Planning Authority will negotiate with developers to secure an element of affordable housing on each of the allocated housing sites listed in Policy HC2 and unforseen housing sites involving 25 dwellings or more or 1 hectare (irrespective of the number of dwellings) of land that come forward in Devizes, Marlborough, Tidworth, Pewsey, Market Lavington and Ludgershall. Additionally, within Marlborough, where acute pressure for affordable housing can be shown, the Local Planning Authority will also seek to negotiate an element of affordable housing on sites involving 15 or more houses or half a hectare of land (irrespective of the number of dwellings).

The Local Planning Authority will seek to negotiate about a 30% 'subsidised' affordable housing contribution and a 20% low cost market housing contribution on appropriate unforeseen housing sites subject to evidence of local housing need supporting this level of provision and individual site characteristics.

In relation to the sites listed in Policy HC2 the Local Planning Authority will seek to negotiate the following levels of provision:

Roundway Mill, Devizes about 10 subsidised

The Local Planning Authority will need to be satisfied that the subsidised affordable housing provided under this policy will always be available for defined local needs, both initially and on subsequent change of occupant. In the case of 'subsidised' affordable housing this should be through the involvement of a Registered Social Landlord, village trust or similar body and secured by the use of planning conditions or obligations.

#### HC31 INTEGRATION OF AFFORDABLE HOUSING

Planning permission will only be granted where the affordable housing provided in accordance with policy HC30 is:

- a) carefully integrated within the overall development;
- b) distributed in accordance with design principles established in policy PD1;
- c) clustered in small groups of housing of not more than about 10 dwellings; and
- d) the size and type of individual houses proposed reflects local needs.

The level of acceptable integration may vary to reflect the size of the housing site, the form of development proposed and the type of affordable housing proposed.

#### HC34 RECREATION PROVISION ON LARGE HOUSING SITES

In new residential developments of 20 or more dwelling units recreational open space will be required to be provided on the basis of 2.43 ha/1000 people, comprising:

a. equipped play space

- 0.31ha/1000 people

b. casual play space

- 0.41ha/1000 people

- c. formal sports/pitches
  - 1.71 ha/1000 people

#### HC36 RETENTION OF LAND FOR RECREATION

The recreation land provided under policies HC34 and HC35 should always be available and maintained as recreation space for the benefit, primarily, of residents of the related housing developments. Therefore, planning permission will be subject to conditions or a planning obligation will be negotiated to ensure that the recreation space is provided to an agreed standard and site specification and remains available and maintained in the long term.

#### HC37 DEMAND FOR EDUCATION

In the case of new housing developments involving 25 or more dwellings or 1 hectare of land (irrespective of the number of dwellings) the Local Planning Authority will need to be satisfied (having regard to advice from the LEA) that the primary and secondary education needs of the population of the new development can be met either by existing school infrastructure or through improvements to the existing school infrastructure. A contribution towards improvement of the existing school infrastructure will be sought where there is evidence that demonstrates that the need for the improvement is a consequence of the new housing development. The contribution will be related to the education needs generated by that development.

#### HC38 NEW PRIMARY SCHOOL IN DEVIZES

The Local Plan allocates land for educational purposes at Devizes as indicated on Inset Map 1. to meet the primary education needs arising from the new population generated by housing proposals at Quakers Walk, Roundway Mill, Le Marchant Barracks, Naughton Avenue, and the North Gate/the Wharf/Devizes Hospital. Proposals for alternative forms of development, other than community uses, will not be permitted within this area. Each of these housing sites should contribute to the development of the new school.

#### HC42 ADDITIONAL SOCIAL AND COMMUNITY NEEDS

In the case of new housing developments involving 25 or more dwellings or 1 hectare of land (irrespective of the number of dwellings) the local planning authority will need to be satisfied that the social and community needs of the new residents can be met. Where the local planning authority has evidence to demonstrate that these needs cannot be met by existing infrastructure, appropriate provision to meet the needs arising from the development will be sought.

#### AT1 TRANSPORT APPRAISAL PROCESS

# All development proposals should adequately address the issues listed below, where they are relevant to the development under consideration:-

- a) minimise travel through careful siting and design;
- b) the provision of alternative access to the development other than by the private car including by public transport, cycling and walking (with proper provision for people with disabilities and careful attention to cyclist and pedestrian safety);
- c) the incorporation of facilities such as secure cycle parking, bus stops or taxi pick up/drop off points to encourage a choice of travel mode;
- d) the provision of traffic calming measures including using imaginative design and layout wherever appropriate;
- e) the provision of off-site highway or public transport improvements in the locality where extra traffic generated by the development would have identifiable adverse effects on highway safety or convenience;
- f) the provision of car parking spaces in accordance with the Council's adopted maximum car parking standards; and
- g) the provision of cycle parking spaces in accordance with the Council's adopted Minimum Cycle Parking Standards

#### AT9

#### MOTOR VEHICLE PARKING STANDARDS

- a) Subject to their agreement by each of the local authorities in Wiltshire all new development will make provision for the parking of motorised vehicles in accordance with the proposed Maximum Standards, set out in Appendix AT2.
- b) Parking for Employment and Retail uses in settlement areas should serve the centre as a whole and not be reserved solely for use in connection with the proposed development.

#### AT10 DEVELOPER CONTRIBUTIONS

Contributions will be sought by way of planning agreements as appropriate for each development proposal, either separately or collectively, to ensure convenient access via alternatives to the motor car. Where contributions are deemed necessary, they will be directly and reasonably related in scale and kind to the proposed development, and should provide for infrastructure improvements, including bus priority measures, safety measures, pedestrian and cycle facilities and bus stopping facilities. Such contributions may be phased over time to reflect the progressive nature of the mode share changes being sought or alternatively may be time limited. They may also be linked to ranging levels of occupancy and use or parking provision.

#### Policy AT11 CAPITALISED REVENUE DEVELOPER CONTRIBUTIONS

Where deemed necessary, a capitalised revenue contribution will be sought to provide bus services to access new development. Such contributions will be directly and reasonably related in scale and kind to the proposed development. They may be linked to ranging levels of occupancy and use or parking provision.

#### AT12 CYCLE PARKING FACILITIES

Facilities for parking bicycles must be provided in developments in accordance with the minimum standards in Appendix AT2 (where those standards are relevant to the development). In the case of significant development proposals, consideration should also be given to the provision of associated shower and changing facilities to encourage further this mode of transport.

#### TR22 PUBLIC ART

The Council will encourage the provision of new works of Public Art on sites requiring Planning Briefs (as identified in Policy PD1), in order to enhance the appearance of the development, the amenity of the area and the quality of the local environment.

#### SUPPLEMENTARY PLANNING GUIDANCE

Adopted by Kennet District Council and relevant to this site.

- 1 Recreation Space, Public Open Space and Private Amenity Spaces in Residential Areas
- 2 Affordable Housing Policy Guide

#### DEVIZES STRATEGIC DEVELOPMENT BRIEF

This sets out developer contributions in relation to education, highways/transport, sports and community facilities

#### **APPENDIX 2**



DEPARTMENT FOR CHILDREN, EDUCATION & LIBRARIES Bob Wolfson, MA Director

Mr D W Parker David Parker Architects Ltd The Old Brewery Tap 3 Shirburn Street WATLINGTON OX49 5BU



Our Ref: SF/MJU/03SF344 Your Ref: RDM/2/TP/03

cc / F Wilsin - ZZ/12 T Hoursone.

This is a response to my enging & confirms T. Hounsome's intermation.

18 December 2003

Please ask for: Sue Farr

Dear Mr Parker

#### Proposed Roundway Mill Development, London Road, Devizes

Thank you for your recent enquiry with regard to the above site.

As you can see from the accompanying maplet there are no known archaeological features or finds from the Proposed Development Area. It is unlikely, based on our current knowledge, that anything of archaeological interest will be disturbed by the development and therefore no archaeological investigation would be required.

I hope this information is of help. If you have any further queries please do not hesitate to contact me.

Yours sincerely

Sue Farr Assistant Archaeologist

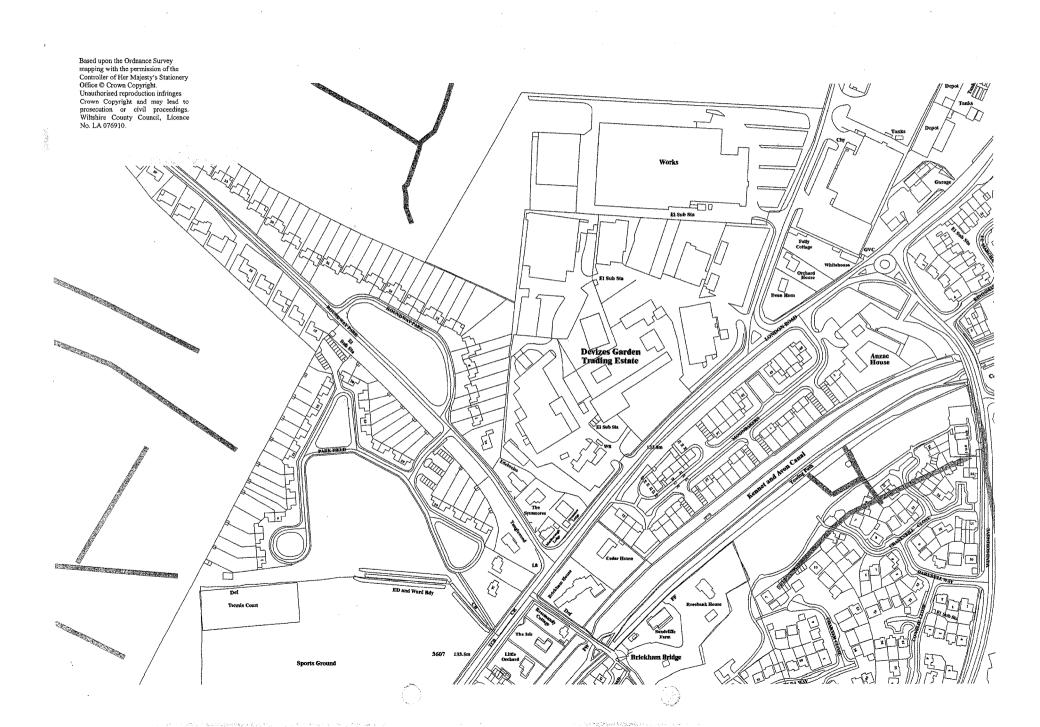
Enc: maplet



ROM/2 Y COUNCIL

Trowbridge Wiltshire BA14 8BS Fax: (01225) 713514 Telephone: Operator: (01225) 713000 Direct Dial: (01225) 713734 Website address: <u>www.wiltshire.gov.uk</u> E-mail address: archaeology@wiltshire.gov.uk

Libraries and Heritage Bythesea Road



# **APPENDIX 3**

# PHOTOGRAPHS

Photoboard 3	Traditional Built Form and Details
Photoboard 4	Recent High Density Residential Development
Photoboard 5	Site Survey and Immediate Context Supplementary Photographs
Photoboard 6	Glory Mill Wooburn Green and the Waterside Aylesbury; Examples for Consideration

**APPENDIX 4** 

## CONSULTATION

List of consultees invited to public consultation event

Visitors log – register of people who attended the public consultation event

**Correspondence received** 

APPENDIX 4

### **Devizes Consultees**

Organisation: Contact Name: Contact Position: Phone:

Organisation:

Phone:

Contact Name: Contact Position: Bishops Cannings Parish Council Mr Paul Taylor Clerk Address: Old Pump Cottage The Street Bishops Cannings Devizes Wilts

SN10 2LD

Address: Town Hall St John's Street

Devizes Wiltshire

SN10 1BN

SN10 5DG

<u>Address:</u> 28 Broadleas Road Roundway

Devizes Wiltshire

Address: Dept. of Education and Libraries County Hall Bythesea Road Trowbridge Wiltshire BA14 8JD

Address: County Hall Bythesea Road

Trowbridge Wiltshire

Address: Department of Environmental Services County Hall Bythesea Road Trowbridge Wilts BA14 8JD

**BA14** 

Address: Southgate House Pans Lane

Devizes Wiltshire

**SN10 5EQ** 

<u>Organisation:</u> Contact Name: Contact Position: Phone:

Mr D Francis Clerk 01380 725461

**Roundway Parish Council** 

**Devizes Town Council** 

Mr Simon Fischer

Clerk 01380 722160

Organisation: Contact Name: Contact Position: Phone: Wiltshire County Council Mr M Dodds Education Officer (Strategy) 01225 713000

Wiltshire County Council -

Development Control Manager

Wiltshire County Council

Mr P Tilley

01225 713000

Mr David Raply

01225 713472

Structure Plan Team

Organisation: Contact Name: Contact Position: Phone:

Organisation: Contact Name: Contact Position: Phone:

Organisation: Contact Name: Contact Position: Phone: Kennet & North Wilts PCT Mrs E Jones Director of Planning & Commissioning 01380 733823

Organisation: Contact Name: Contact Position: Phone:

**Community First** Ms P Read Community Initiatives Manager 01380 722475

The Environment Agency

Mrs T Gallop

01258 456080

Wessex Water

01225 526301

Mr MF Cox

Address: Wyndhams St Josephs Place

Devizes Wiltshire

**SN10 1DD** 

Address: **Rivers** House Sunrise Business Park High Shaftesbury Road Blandford Forum DT11 8ST Dorset

Address: Claverton Down Road Claverton Down

Bath

Address: Wayside Farm

Devizes Wiltshire

Address: Devizes Books Handel House Sidmouth Street Devizes Wiltshire

Address: 38 Meadow Drive

Devizes Wiltshire

> Address: Elm Tree Court Long Street

Devizes Wiltshire

SN10 1NJ

Organisation:

Organisation:

Phone:

Contact Name:

**Contact Position:** 

Contact Name: Contact Position: Phone:

Organisation: Contact Name: Contact Position: Phone:

Organisation:

Contact Name: Contact Position: Phone:

Organisation: Contact Name: **Contact Position:** Phone:

Organisation: Contact Name: Contact Position: Phone:

Wiltshire Wildlife Trust Mr G Morgan Head of Conservation 01380 725670

The Trust for Devizes

**Devizes Development Partnership** Mrs Jo Edwards Chairman

Mr D Ainge

Secretary 01380 724854

01380 860470

**Devizes/Marlborough FoE** Ms K Freeman

**Devizes Chamber of Commerce &** 

Developers Group Manager

Etchilhampton

SN10 3JT

BA2 7WW

SN10 1LD

SN10 3BJ

Organisation: Contact Name: Contact Position: Phone:	Kennet Group CPRE Dr J Kirkman Chairman 01672 520429	<u>Address:</u> Witcha Cottage Ramsbury Marlborough Wiltshire	SN8 2HQ
Organisation: Contact Name: Contact Position: Phone:	Sarsen Housing Association Mr S Williams Development Manager 01380 720027	Address: Sarsen Court Horton Avenue Cannings Hill Devizes Wiltshire	SN10 2AZ
Organisation: Contact Name: Contact Position: Phone:	Kennet District Councillor/Wiltshire Cllr Mrs Taylor 01380 723537	<u>Address:</u> 28 Parkfields Devizes Wiltshire	SN10 2EB
Organisation: Contact Name: Contact Position: Phone:	Wiltshire County Councillor Cllr Mrs Rugg 01380 722677	Address: No 1 Lansdowne Grov Sheep Street Devizes Wiltshire	e SN10 1NZ
Organisation: Contact Name: Contact Position: Phone:	Kennet District Councillor/Campaign For Dark Skies Cllr G Brewer Local Officer	<u>Address:</u> 63 Downlands Road	
Organisation:	Roundway Mill Boundary Residents	Devizes Wiltshire Address:	SN10 5EF
Contact Name: Contact Position: Phone:	Mr J Hawkins 01380 722302	1A Roundway park Devizes Wiltshire	SN10 2ED

Organisation: Contact Name: Contact Position: Phone:	<b>Roundway Park Group</b> Mr H Clayton 01380 727898	<u>Address:</u> 44 Roundway Park Devizes Wiltshire	SN10 2EE
Organisation: Contact Name: Contact Position: Phone:	Kennet District Councillor & Trust for Devizes Cllr J Ody	Address: Pine House Pans Lane Devizes Wilts	SN10 5AP
Organisation: Contact Name: Contact Position: Phone:	Kennet District Councillor Cllr R T Parsons	<u>Address:</u> The Falt Hillworth Stores 47a Hillworth Road Devizes Wilts	SN10 5HB
<u>Organisation:</u> Contact Name: Contact Position: Phone:	Kennet District Councillor Cllr Mrs P M Winchcombe	<u>Address:</u> 6 Kirby Close Devizes Wilts	SN10 2EL
Organisation: Contact Name: Contact Position: Phone:	Kennet District Councillor Cllr P Evans 01380 722499	<u>Address:</u> 27 Nursteed Road Devizes Wilts	SN10 3AF
Organisation: Contact Name: Contact Position: Phone:	Kennet District Councillor Cllr T Duck 01380 723116	<u>Address:</u> E F Duck & Son 11 Maryport Street Devizes Wilts	SN10 1AH
Organisation: Contact Name: Contact Position: Phone:	Kennet District Councillor Cllr Mrs K Callow	<u>Address:</u> 46 The Fairway Devizes Wilts	SN10 5DX

#### Kennet District Councillor Cllr N Carter

#### Address: 10 Market Place

01380 726247

Devizes

Wilts

SN10 1HT

Organisation: Contact Name: Contact Position: Phone:

Organisation:

Phone:

Contact Name:

Contact Position:

Devizes Community Area PartnershipAddress:Grp Capt BrownlowSpringfields Chairman 01380 728469

Stert Devizes Wiltshire

SN10 3JD

## SURECAST (DEVIZES) LUMITED

## APPENDIX 5

VISITORS LOG 24 March Visitors Log 7pp. ROUNDWAY MILL EXHIBITION/MEETING

Name	Address	Comments
Ban ston	18 ROUNDWAY PARK.	
BROWN	2 Horobell Way	
KENST KENST	24, DoenDucy PK.	
MRY MRP Oakford	10 Roundway Phy	
Laurs	3 RONDWAY PR	
Hondrick	Gre Western Close	
MR + MRE WHITFIELD	13 Randway Past.	

## S RECAST (DEVIZES) LIPATED

Name	Address	Comments
Goorp Captain	Springfields, Stert,	
R BRONHLOW	5NIO 35D	
HR aturs P. BRITTER		
El Wint	KDC	
J+K Goodman	Mariboronghhødge Pourdway PK	
C FRANKLIN	63 SPRING FIELD BRADFOLD ON AUGN	
Ma. Millon,	4 Roussman Park	
Nice / Kanow Hosso	1 Rumansas Para.	

## **<u>S</u>RECAST (DEVIZES) LI 11TED**

Name	Address	Comments
Mr Stores Mrs.	12 Roming Par.	
MRS. M. STEEL	8 ROUNDWAY RARK.	
Mes Dicher	Tanjewood, foundway Ac	
DFELSTRAD	10 HOPKIN RD	
NGAGGR P. Coucit	Sycamore Lodge Rand way Park.	
J. TARRANT	7 ROUNDWAY PK	
T. 5782	8 ROUNDWAY PARK	

## S'RECAST (DEVIZES) LI'IITED

Name	Address	Comments
	HCOMMERCIAL LOAD	Main Concert Read - TRAFFICE - MOSETHENTS
-Pian - Jone. CJ MUGRIDGe	18 DAVIES DRIVE DEVIZES.	
Ly J Sheridan	6 Randway Porth Denzes	
P. Wood	ADASTRA HOUSE LONDON RD DEULLE	
A-ADAMSON (CHAIRMAN).	BISHOPS CHNNINGS PC	
J. BARTHRAM.	12 ROUNDWAY GDNS.	
A. MAYMEN	STRAHER AND LO, DEVILES.	

# SHRECAST (DEVIZES) LITITED

Name	Address	Comments
L Cowen	Gazetle 4 Herald	
J Balorch	19 hourdway Refk	
JBEShgto	Roundway Godons Deugni	
JP-Bashyh	Kandug	
Ed Wills	KX	
F.M. WATEINS.	31 ROUNDWAY PARK.	

## SURECAST (DEVIZES) L//IITED

Name	Address	Comments
Tim Gymes	Kennet District Council	Epicueius Naira CHANGER TO WAYSING.
RICHARS JOHONS	TINCKNELLS LTD.	
RICHARDS SHUARING		
ELUS.	26 ROUNDWAN SKONS	
(	:	
OBAIN HANKING. SUSAN HANKING	1 A Row Dury Pic. Howaway Massace Court )	
Stephanie Jace.	41 Roundway Park.	
lan Poste Anvinke	wee	
Manjanet Tonylor Ray Taylor	28 Partillas	Design proposab - "reference to better grality housing" is Sourally divisive and unecessary

Tel; 01380-722891

6 Roundway Gardens, Devizes, Wiltshire. SN10 2EF. 17th March 2004.

KENNET COUNGIL Lettin No. Ack's 24 MAR 2004 Copies to:

To- The Consulting Officer, Planning Department, Kennet District Council, BROWFORT Bath Road, Devizes

#### Dear Sir.

Ref: ROUNDWAY MILL DEVELOPMENT.

As I am unable to attend the meeting on Wednesday next I would like to enter my comments for the record.

Due to the fact that the project is now committed to paper and models, I would venture to suggest that Outline Planning Permission be deferred until a traffic survey is properly carried out.

The traffic to be generated will be considerable from the proposed developments at London Road [Quakers Walk discharge point], Le Marchant Barracks and Roundway Mill when they all proceed.

One can safely assume that at least one car at minimum per property will discharge onto the London Road at the peak times 7am - 9:15 am and 3:30 - 6:00 pm, either into or out of town, to an already restricted road with cycle ways. It is clearly impossible for two thirty tonne lorries to pass each other without entering the cycle way already. Now it is proposed to `double` the volume of traffic at peak periods.

I feel that Wiltshire County Council are being negligent if they will not be carrying the traffic survey before outline planning is given. WHAT PRICE A STRUCTURE PLAN? Has this been thrown out?

The W.C.C. are already aware of the chaos every morning by vehicles backing up as far as the barracks from the centre of town and equally down the Bath Road at peak times.

If they will not carry out this survey, then I would suggest that Kennet District Council do so, in order to make an overall sensible infra- structure plan before any permissions are given.

If the school is built on the Police H.Q. site then one can only imagine the absolute chaos that will be caused by traffic trying to cross over the opposing flow to access the school.

Yours Faithfully

Mr. K. Dixon.

RDM Comments 24 March 2004

### ROUNDWAY MILL REDEVELOPMENT PUBLIC CONSULTATION

### COMMENT SHEET

Our Main concern is the close proximpty to our border fence. It is proposed that 4 x 2.5 star collages built with a side view. We feel this is too are obviously have an impact to noise + the view C1050 V hause + garden 11 years ago we searched our property ina sewitha Deacehillocation Webre currently by the factory at present ( recas eview to a property is 2 preffered option rather overloon asever reavest H 0110 -considered. SOV Q are re-visited ort treespr alca a the barder loohind lanted create <u>a</u> Screen Fence for VIEWA DOISE PURPOSES. You do not have to give your name and contact details but it would be helpful to do so, and might affect how much weight can be given to your comments. Mrs Mrs J. Sheridan Name: Park undway ENZES Address/contact details:

01380 72323 TOI

Please return to: David Parker Architects Limited The Old Brewery Tap 3 Shirburn Street Watlington Oxfordshire OX,49 5BU

Tel: 01491 613066

All comments received will be copied to Kennet District Council Planning Department.

### **APPENDIX 5**

### ENVIRONMENTAL ACOUSTICS (of Weston Super Mare) REPORT 11 March 2004

#### 1. Introduction

- 1.1 A planning application is being submitted for the redevelopment of the Roundway Mill site, currently occupied by Surecast. The proposal is for a mix of residential units across the whole site.
- 1.2 Kennet District Council has asked for a noise assessment to be undertaken since there is some concern over the possible noise impact of activities on the adjacent site used for the temporary storage of agricultural equipment.
- 1.3 A glossary of acoustic terms can be found in Appendix I.

#### 2. Assessment criteria

- 2.1 Planning Policy Guidance Note PPG24: Planning and Noise, published in 1994, provides guidance to Local Authorities on the use of planning powers to minimise the adverse impact of noise.
- 2.2 In its general principals, PPG24 suggests that wherever possible noise sensitive uses should be separated from major sources of noise. However, it also states that where this is not possible local planning authorities should consider whether it is practicable to control or reduce noise levels, or to mitigate the impact of noise through the use of planning conditions.
- 2.3 For dwellings the PPG24 introduced the concept of noise exposure categories (NECs) for sites affected by road traffic noise.
- 2.4 However, the primary concern at this site is the possible noise impact of activities on the adjacent site used for the temporary storage of agricultural equipment. In these circumstances PPG24 refers to the use of BS4142:1997 *Method for rating industrial noise affecting mixed residential and industrial areas.*

2.5 BS4142 suggests a method for measuring and rating industrial noise and then comparing this *rating level* to the *background noise level*. The difference between the *rating level* and the *background level* is the used to assess the likelihood of complaints in accordance with the Table 1 below.

Difference in noise level (dB)	Significance
Around +10	Complaints are likely
Around +5	Marginal
-10	Positive indication that complaints are unlikely

#### Table 1 BS4142 Assessment table

### 3. Sound level monitoring and discussion

- 3.1 Appendix II contains the sound level measurements in graphical and tabular form as well as the BS4142 assessment.
- 3.2 During the monitoring period there were two episodes of industrial noise likely to affect the noise climate, one short spell of banging and one spell of tractor movements.
- 3.3 Periodically throughout the rest of the monitoring there were occasional clangs and sporadic tractor movements, although none of these appeared to affect the L<sub>Aeq,5min</sub>.
- 3.4 According to the client rarely is any activity observed on the yard; the yard is mainly compacted hard core and not metalled, which could indicate that it is not regularly and often used for maintenance and vehicle movements etc.
- 3.5 There are houses to the west of the Surecast site which, it is understood do experience noise from Surecast. Given the nature of Surecast operations and the type of buildings it is considered that the potential for noise problems from this site is significant. Hence, the closure and redevelopment of the site will relieve any noise problems which may presently exist.

\_\_\_\_2

- 3.6 The BS4142 assessment for each activity shows an excess of the rating level over the background level of 14 and 11 dBA for the banging and tractor activity respectively.
- 3.7 If this is considered in the light of BS4142 it is likely that complaints would be received.
- 3.8 It was proposed, initially, to erect a 2m high structural screening along the north east perimeter of the site to give the leisure areas some privacy.
- 3.9 Table A2.4 shows the effect of three barrier heights, 2.0, 2.25 and 2.5m with likely reductions of 10, 11 and 13 dB. (See Appendix II for more detail). The barrier must be continuous and be of sufficient weight (at least 10kgm<sup>-2</sup>) to act as an effective noise barrier (such as a single skin masonry wall or double thickness close-boarded timber fence).
- 3.10 Clearly, from an acoustic point of view the higher the barrier the better but the higher the barrier the greater the potential loss of light and visual presence.
- 3.11 It is generally accepted that a barrier, if it breaks the line of sight between the source and the receiver will reduce the noise levels by around 10 dB. Hence if this is taken into account in the BS4142 analysis the excess drop to 4 and 1 dB; which then places the site into the "marginal significance" band.
- 3.12 It is always difficult in situations such as this to be sure that the activities monitored are representative of the normal situation without prolong periods of attended monitoring.
- 3.13 However, it is understood from the client that activity on the site is irregular and infrequent.

### 4 **Recommendations**

4.1 An acoustic barrier should be erected around the north and north east site boundaries should be at least 2.0m high and with a weight of at least 10kgm<sup>-2</sup>.

Report Ref

3





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