



Minutes of the Bradford on Avon Town Council Environment & Planning Committee
Held in the Town Council Offices, St Margaret's Street, Bradford on Avon
On Tuesday 5th November 2019 at 7.00 p.m.

Present:

Cllr A Kay (Chairman)
Cllr J Parker
Cllr T Lomax
Cllr D Newton
Cllr M Roberts
Valerie Baker (Administrator)
Colin Johns – BOATC Planning Consultant

Chris Beaver (Agent for Redcliffe Homes) and Guto Jones (Landscape & Architect - Redcliffe)

Members of the Public: Barbara Tees, Dr T Tees, Dr F Tees, Brian Elliot, Georgina Newton, Tracey Dunn (Headteacher Fitzmaurice School) Nicky Locke (Chair of Governors – Fitzmaurice Primary School, Pam Hyde, John Grittham, and 23 others.

Chris Beaver and Guto Jones gave a brief report regarding Planning application 19/09366/OUT – Redcliffe Homes development on land between Cemetery Lane and Woolley Street, Bradford on Avon. A plan of the proposed development was displayed. Redcliffe representatives left the meeting at the end of questions from the public.

Comments from the audience were received (see Appendix 1 attached)

Apologies: Cllr E Franklin

117. Minutes

It was proposed by Cllr Parker seconded by Cllr Newton and with all in favour **RESOLVED:** to approve the delegated minutes for the 1st October and the minutes of meeting for the 15th October 2019 as a true record and signed by the Chairman.

118. Declarations of interests – Cllr D Newton declared an interest for Planning Application 19/09382/FUL – 5c Sladesbrook

119. Planning Applications

It was proposed by Cllr Parker seconded by Cllr Lomax and with all in favour it was **RESOLVED:** To send the planning recommendations to Wiltshire Council. It was agreed that Cllr Kay would write a letter to Wiltshire Council Planning regarding the lack of notification of plans to neighbouring properties, including Planning Application 19/09800/FUL as well as Woolley residents for the Planning Application 19/09366/OUT. In both cases there are serious concerns, particularly about access and road safety. Not only are residents worried, they are also knowledgeable about the local issues. Further comments were made by the Headteacher of Fitzmaurice see Appendix 1, who explained the School travel plan would be jeopardised, and the access is already poor and further traffic, including building vehicles could threaten the safety of children coming to school.

120. Correspondence relating to planning applications to be considered at this meeting – there was none

121. 19/09366/OUT- Land East of Cemetery Lane

Questions and comments were received regarding this application. Cllr Newton said, that up until this meeting BOATC had not seen a planning application and that it was disingenuous for the applicant to state that the application was somehow consistent with or in support of the Neighbourhood Plan when the applicant had previously threatened to take the decision to take the plan to Judicial Review. He added that no Public Consultation had been arranged, and, given that they did not remain to be questioned by Members, there appeared to be a complete lack of respect towards this Planning Committee. The developer's agent present at this meeting should not be viewed as public consultation

It was **RESOLVED** that a comprehensive report refusing the application would be forwarded to Wiltshire Council Planning.

122. Arnolds Woodland

Members considered accepting the donation of Arnold's Wood (located next to the Leigh Park Hotel). The woodland was planted in 1992 by a resident in memory of her late husband. It was proposed by Cllr Kay seconded by Cllr Newton and with all in favour **RESOLVED:** to accept the donation (subject to legal costs) of the woods into Bradford on Avon Town Council ownership.

123. Climate Emergency Event

Cllr Kay reported that the next Climate Emergency meeting would take place in St Margaret's Hall on 14th November where the revised Draft Climate Emergency Action Plan would be discussed. It was **agreed** to forward the CE Action workbook to all members in advance of the meeting.

124. Chairman's Report

(See attached) It was agreed to attach the Climate Emergency Workbook to the minutes.

125. Correspondence for Action

There was none.

126. Correspondence to note

There was none.

Meeting closed at 8.15 p.m.

Appendix 1

QUESTION TIME OPEN TO THE PRESS AND PUBLIC

Planning Application 19/09800/FUL – 12A Frome Road – BA15 ILE

Barbara Tees and Dr Fiona Tees (who spoke on behalf of her Father) relayed their concerns about this planning application; primarily about the access to the site and the 'pinch point' of 2.7mtr wide which was not a sufficient width for large vehicles such as dust carts and emergency vehicles. It was dangerous for pedestrians and could potentially cause damage to her property when entering the site.

Tracey Dunn reported that she had not been informed about this application until the day before the E & P meeting and was disappointed that Wiltshire Council had not made the school aware of this development whose boundary borders the school.

Nicky Locke said she had concerns about the access road leading into the site that would compromise the safety of the children walking to and from Fitzmaurice School. She added that a change of plan on parking which would have implications to the School Travel plan. It was agreed Fitzmaurice would send a copy of the School Travel Plan to Wiltshire Council for reference.

The following comments all referred to the Planning Application for Redcliffe Homes 19/09366/OUT- Land East of Cemetery Lane

Brian Elliot explained that he had various concerns about the proposed site, as he had reported at the previous E&P meeting, such as increased traffic, the access road being constructed on a Green space and negative effects on the biodiversity of the site.

Georgina Newton expressed concerns about the entrance size for access to the site. She asked 'why a play area was positioned next to the attenuation pond and an existing badger set'. She questioned why the developer thought the site would 'add to the biodiversity' when in her opinion it would destroy existing biodiversity.

Pam Hyde asked if a traffic assessment had been done.

John Grittham questioned how modifications to Woolley street could be actioned when many of the houses built in the street are positioned along the kerbside adding that cars regularly park along this street which meant that traffic has to regularly mount the pavement. He asked how difficult it would be to put the site back to Green Belt status

Tracy Bolland asked how construction vehicles would be able to access the site via Woolley street given the concerns that John had mentioned above.

E&P Chairman's report 05/11/19

Alex Kay

Environment

1. Next session of CE Community Steering: 7pm: 14th November SMH.
2. Prioritisation of action list attached, working with Rachel Berger and others.
3. Community Fridge installed. Holly Taylor is working on all the certification and volunteer management required: launch soon.
4. 17/10/19: Successful Bat evening with over 100 attendees: more info bradfordonavontowncouncil.gov.uk/importance-of-bradford-on-avons-bats/
5. BOATC Greenspace Officer approved by Council, now advertised
6. Continued meetings concerning River Avon water levels, management, flooding etc, after last month's E&P meeting; this is difficult but we're working on it.
7. 28/10/19: meeting with Peter Capener, BWCE and CF team about community renewable projects, esp. solar. BWCE have resources to support projects in the town if of the appropriate type.
8. 29/10/19: meeting with John Potter and Dr Nick Murry, Cllr Wilts & Chippenham, about CE actions and exchange of ideas, esp. wind power and solar. Note: Wind turbines are not illegal in Wiltshire, but have been discouraged for many years through planning process as were deemed unpopular (*times have changed?*)
9. 06/11/19: Pres Trust event: David Green talk about river flora of BoA
10. 26th November: Warminster Climate Emergency meeting; Intending to take CE motion to TC in December.
11. CE March proposed 29th November
12. January 2020: CE Energy focus group session, incl. presentation from Peter Capener; details tbc.

Planning

1. 01/11/19: Wiltshire Historic Buildings Trust talk about community engagement in new developments and incorporating heritage, by Dr Geraint Coles, Director of the Cultural Heritage Institute, based in Swindon. Useful contact for community engagement and sustainable development.
<https://www.rau.ac.uk/about/organisation/staff/dr-geraint-coles>
2. 06/11/19: AECB Local Group event in BoA concerning proposed changes to Parts L & F of the Building Regulations (part L is Conservation of fuel and power, part F is ventilation).
3. Neighbourhood Plan 2036 update project to be started: standby for launch of steering group. (Hopefully the 2026-2036 update will not require full rework of adopted plan.)

BRADFORD ON AVON TOWN COUNCIL
 PLANNING APPLICATIONS CONSIDERED AT THE DELEGATED ENVIRONMENT & PLANNING
 COMMITTEE MEETING ON TUESDAY 5th NOVEMBER 2019

Town Council reference	1
Ward	BRADFORD ON AVON NORTH
Planning Application Number	19/09105/FUL
Type of application	FUL
Date to comment	15.11.19
Town Council meeting date	05.11.19
Case Officer	Steve Vellance
Applicant	Cannon Liam O'Driscoll
Address	Catholic Church of St Thomas More, Market st
Description of work	Installation of new boiler flue
Town Council recommendation	PERMIT - No objections

Town Council reference	2
Ward	BRADFORD ON AVON NORTH
Planning Application Number	19/09413/LBC
Type of application	LBC
Date to comment	15.11.19
Town Council meeting date	05.11.19
Case Officer	Steve Vellance
Applicant	Cannon Liam O'Driscoll
Address	Catholic Church of St Thomas More, Market st
Description of work	Installation of new boiler flue
Town Council recommendation	PERMIT - No objections

Town Council reference	3
Ward	BRADFORD ON AVON SOUTH
Planning Application Number	19/09313/FUL
Type of application	FUL
Date to comment	08.11.19
Town Council meeting date	05.11.19
Case Officer	Verity Giles- Franklin
Applicant	Miss J Jeary
Address	The Georgian Lodge, 25 Bridge St BA15 1BY
Description of work	Change of use of ground floor from A2 (Financial & professional services) to B1(a) (offices)
Town Council recommendation	PERMIT - No objections

BRADFORD ON AVON TOWN COUNCIL
 PLANNING APPLICATIONS CONSIDERED AT THE DELEGATED ENVIRONMENT & PLANNING
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Town Council reference	4
Ward	BRADFORD ON AVON NORTH
Planning Application Number	19/09382/FUL
Type of application	FUL
Date to comment	06.11.19
Town Council meeting date	05.11.19
Case Officer	Verity Giles- Franklin
Applicant	Mr & Mrs R Thomas
Address	5c Sladesbrook BA15 1SH
Description of work	Two storey side elevation
Town Council recommendation	PERMIT - No objections subject to the use of a render finish to the street elevation in place of the timber cladding which will be incongruous in the street scene.

Town Council reference	5
Ward	BRADFORD ON AVON NORTH
Planning Application Number	19/09366/OUT
Type of application	OUT
Date to comment	08.11.19
Town Council meeting date	05.11.19
Case Officer	Steven Sims
Applicant	Redcliffe Homes Ltd
Address	Land adjacent to Cemetery Lane, Holt Rd
Description of work	Outline application to build 42 dwelling and associated landscaping & access works - approval sought for access
Town Council recommendation	REFUSE - Please see attached comments

Town Council reference	6
Ward	BRADFORD ON AVON NORTH
Planning Application Number	19/08937/TCA
Type of application	TCA
Date to comment	08.11.19
Town Council meeting date	05.11.19
Case Officer	Beverley Griffin
Applicant	Mr D Weaver
Address	196 Bath Rd BA15 1SL
Description of work	OD - 33% Crown Reduction to Beech Tree
Town Council recommendation	PERMIT - No objections

BRADFORD ON AVON TOWN COUNCIL
 PLANNING APPLICATIONS CONSIDERED AT THE DELEGATED ENVIRONMENT & PLANNING
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Town Council reference 7
 Ward BRADFORD ON AVON SOUTH
 Planning Application Number 19/07490/FUL
 Type of application FUL
 Date to comment 06.11.19
 Town Council meeting date 05.11.19
 Case Officer Verity Giles- Franklin
 Applicant Mrs A Monnington
 Address 1 Trowbridge Rd, BA15 1EE
 Description of work Retrospective change of use of an annexe to holiday let accommodation
 Town Council recommendation PERMIT - No objections

Town Council reference 8
 Ward BRADFORD ON AVON SOUTH
 Planning Application Number 19/09800/FUL
 Type of application FUL
 Date to comment 15.11.19
 Town Council meeting date 05.11.19
 Case Officer Jemma Foster
 Applicant Avondale Developments Ltd
 Address 12A Frome Rd BA15 1LE
 Description of work Demolition of existing dwelling & outbuilding & replacement with 5 residential dwellings, alterations to existing boundary wall to accommodate widened vehicular access.
 Town Council recommendation REFUSE - See attached comments

Town Council reference 9
 Ward BRADFORD ON AVON EAST
 Planning Application Number 19/08523/FUL
 Type of application FUL
 Date to comment 12.11.19
 Town Council meeting date 05.11.19
 Case Officer Verity Giles- Franklin
 Applicant Moulton
 Address Kingston Farm Holt Rd, BA15 1TS
 Description of work Change of use of Part of an agricultural building to B8 use
 Town Council recommendation PERMIT - No objections

BRADFORD ON AVON TOWN COUNCIL
 PLANNING APPLICATIONS CONSIDERED AT THE DELEGATED ENVIRONMENT & PLANNING
 COMMITTEE MEETING ON TUESDAY 5th NOVEMBER 2019

Town Council reference	10
Ward	BRADFORD ON AVON EAST
Planning Application Number	19/09821/ADV
Type of application	ADV
Date to comment	18.11.19
Town Council meeting date	05.11.19
Case Officer	Yancy Sun
Applicant	Mr Dave Hancock
Address	Kingston Farm Holt Rd BA15 1TS
Description of work	Proposed advert displaying company name on side of building
Town Council recommendation	PERMIT - No objections as long as it is modest and not lit

Town Council reference	11
Ward	BRADFORD ON AVON SOUTH
Planning Application Number	19/09527/FUL
Type of application	FUL
Date to comment	19.11.19
Town Council meeting date	05.11.19
Case Officer	Carla Rose
Applicant	Mr Simon Cope
Address	2 Moulton Drive, BA15 1UF
Description of work	Proposed garage conversion to provide additional living space. Proposed demolition of porch and erection of connecting link between house & garage.
Town Council recommendation	PERMIT - No objections

Town Council reference	12
Ward	BRADFORD ON AVON SOUTH
Planning Application Number	19/09705/LBC
Type of application	LBC
Date to comment	29.11.19
Town Council meeting date	05.11.19
Case Officer	Russell Brown
Applicant	Mrs K Douglas
Address	Kingston Lodge, Woolley St BA15 1AD
Description of work	Pointing repairs to front exterior stonework
Town Council recommendation	PERMIT - No objection but request that a sample of the pointing should be approved by the Conservation Officer before work proceeds.

BRADFORD ON AVON TOWN COUNCIL
PLANNING APPLICATIONS CONSIDERED AT THE DELEGATED ENVIRONMENT & PLANNING
COMMITTEE MEETING ON TUESDAY 5th NOVEMBER 2019

Town Council reference	13
Ward	BRADFORD ON AVON SOUTH
Planning Application Number	18/02661/FUL
Type of application	FUL
Date to comment	06.11.19
Town Council meeting date	05.11.19
Case Officer	Russell Brown
Applicant	
Address	3 Barton Orchard
Description of work	Subterranean extension to the side of the property housing a kitchen& breakfast area, along with minor internal alterations
Town Council recommendation	PERMIT - No objections

Town Council reference	14
Ward	BRADFORD ON AVON SOUTH
Planning Application Number	18/02901/LBC
Type of application	LBC
Date to comment	06.11.19
Town Council meeting date	05.11.19
Case Officer	Russell Brown
Applicant	
Address	3 Barton Orchard
Description of work	Subterranean extension to the side of the property housing a kitchen& breakfast area, along with minor internal alterations
Town Council recommendation	PERMIT - No objections

DRAFT

BRADFORD ON AVON – Land between Cemetery Land and Woolley Street

Erection of up to 42 no: dwellings and associated landscaping and access work; vehicular access to Woolley Street; and provision of a pedestrian link from Grange View to Sladesbrook

Suggested Town Council response to the consultation

The Town Council considers that the application is totally unacceptable and should be refused for the following reason:

Principle of development

The application is contrary to paragraph 47 of the National Planning Policy Framework 2019 (NPPF). This states that the planning system is plan-led and planning law requires that applications for planning permission must be determined in accordance with the Development Plan, including the Neighbourhood Plan, unless material considerations indicate otherwise. The proposal does not constitute an exception as set out in Wiltshire Core Strategy, paragraph 4.25, and no justification has been proved.

In this case the applicants acknowledge that their application is not in accordance with the Wiltshire Core Strategy or the Bradford on Avon Neighbourhood Plan. The established use of the site is agricultural and it lies outside the Settlement Boundary. The proposal includes development (i.e. the access road) on land formally designated in the NP as a green space which is in principle not acceptable.

The only argument put forward by the applicants in support of their proposal is an incorrect assessment that Wiltshire Council does not have a 5-year land supply. A 5-year supply does exist and there are thus no material considerations to justify the proposal.

The work undertaken in the preparation of the Bradford on Avon Neighbourhood Plan included an examination of a range of housing growth options and identified a number of sites for possible development. Following representations from Redcliffe Homes their proposal to allocate this site for future housing was properly examined. This was subject to a detailed analysis and a full Sustainability Appraisal and was subsequently rejected as an acceptable housing site.

Earlier work undertaken by Wiltshire Council in preparing its draft Core Strategy included a detailed investigation of this site with a firm conclusion that it was not needed in strategic terms. Following adoption of the Core Strategy in January 2015, all reference to previously safeguarded land has been deleted. This is confirmed on page 325 of the adopted Core Strategy where Policy GB3 - *Safeguarded land in Bradford on Avon*, is stated to be "no longer relevant."

In addition to the application being contrary to the Development Plan there are numerous other reasons why it should not be approved including:

- Highways and access
- Infrastructure
- Ecology including the Special Area of Conservation
- Lack of community engagement
- Design and layout including the Historic Environment
- Air quality

Highways and access

It is claimed that the site has good accessibility to existing facilities in Bradford on Avon and good non-car accessibility by bus to the town centre and station.

The approach to the site along Woolley Street is characterised by its relatively narrow width, road frontage buildings, lack of continuous pavements and numerous parked cars creating chicanes. It is entirely unsuitable for heavy goods vehicles and passing even by large cars can be difficult.

Good accessibility is not the view of local residents who use the roads and footpaths on a daily basis and it is inevitable that car use (including to and from schools) will increase. Furthermore the Town Council has been advised by local residents that the highway submission includes inaccurate road and footpath dimensions (overstated). Taking access from an already inadequate road system will not provide safe and convenient vehicular access to the site.

Infrastructure

The infrastructure problems of Bradford on Avon are well documented and the cumulative effect of all recent housing permissions needs to be taken into account, particularly as the developments at Kingston Farm and Tithecote Manor are as yet incomplete. The additional development proposed would place a further significant strain on the road access, air quality, school places, the health service and other aspects of the town.

The local Primary and Secondary schools are full and over-subscribed and although it is possible that Christchurch Primary School could be enlarged this would deal only in a small way towards solving the infrastructure issues. The Heath Centre is under severe pressure but cannot obtain funding to extend.

The lack of adequate infrastructure in Bradford on Avon is recognised in the WCS as the main reason to resist further development.

Ecology including the Special Area of Conservation

Environmental considerations in the Woolley area indicate that protecting and enhancing the natural, built and historic environment; and, helping to improve biodiversity are essential. The site falls within the Bath and Bradford on Avon Special Area of Conservation. Neighbourhood Plan policies GS1 GS2 and GS3 are relevant and additional biodiversity measures are required.

Design and layout

The Town Council recognises that the application is in outline with additional illustrative detail provided. This is the same situation that occurred at the Bellway site (Tithecote Manor) where any attempt to improve the design of the scheme was resisted by Bellway as having been the subject of an agreed "masterplan" at the outline stage. On sites such as this where there are detailed issues to resolve the Council does not consider that Outline Applications should be accepted.

To further illustrate this issue the Town Council has looked at the *High Quality Design* requirements of the NPPF and the WCS. The NPPF indicates that planning policies and decisions should aim to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- are visually attractive as a result of good architecture and appropriate landscaping.

The various supporting documents submitted with this application seek to demonstrate that the scheme will deliver a "high standard of design" but do not address the matters outlined above. The illustrative layout appears to be based on providing the maximum length of road frontage to accommodate the use of the developer's standard range of house types. As such the proposal is

simply a suburban extension into open countryside. The landscape proposals have not emerged from a site analysis but seek to provide a cosmetic treatment to the pre-determined layout. The construction of an access road through the open space has all the appearance of a phase 2 option.

Protection of the setting of the Conservation Area and other Heritage Assets is a further planning requirement but has not been adequately addressed.

Air quality

Additional development can only have a negative effect on traffic and air quality. The emphasis given to encourage pedestrian, cycle and bus use is of no value when it is evident that the distance from the town centre and other amenities means that access to and from the site will be predominately by car.

Lack of community engagement

The Wiltshire Council recommendations in its *Statement of Community Involvement* set out desirable consultation standards. It recommends that the level of community involvement agreed should reflect the scale and complexity of the proposals and consultation will be the responsibility of the developer. This is a sensitive site and the applicant's submitted statement does not meet the Wiltshire Council requirement for full consultation prior to the submission of the application. It has been suggested that community consultation has been undertaken but this was only on a previous application and where the consultation was considered by those affected to be inadequate.

The Neighbourhood Plan 2013-2026

The housing allocation for Bradford on Avon up to 2026 has been met, with some housing still under construction. The Town Council is aware that Wiltshire Council is undertaking a review of housing needs to 2036 and that there may well be pressure to accommodate additional housing in the town.

The recently published Government Housing White Paper states that we need to:

Plan for the right homes in the right places. This is critical to the success of our modern industrial strategy. Growing businesses need a skilled workforce living nearby, and employees should be able to move easily to where jobs are without being forced into long commutes.

It also recognises that:

Development is about far more than just building homes. Communities need roads, rail links, schools, shops, GP surgeries, parks, playgrounds and a sustainable natural environment. Without the right infrastructure, no new community will thrive – and no existing community will welcome new housing if it places further strain on already stretched local resources.

Improving self-containment of the town is part of the WCS strategy for Bradford on Avon and is a key objective of the Neighbourhood Plan. It is not accepted that simply providing more housing will benefit the town. High levels of out-commuting were identified in the preparation of the WCS and since then additional employment opportunities have been lost.

In the past the Town Council has been forced to respond to a number of speculative proposals whereas it considers that a more proactive role is the way forward. It should not therefore be assumed that this site represents an inevitable long-term option.

Climate Emergency

In March 2019, the Town Council, like Wiltshire Council, adopted a Climate Emergency motion. Whilst this is not enshrined in planning regulation, it should be taken into consideration when unsustainable developments are proposed. We should reject low standards of build quality, access, infrastructure and protection of green space and biodiversity.

The previous application 16/12377/OUT

The withdrawn previous application on this site for up to 57 dwellings is a relevant consideration. Consultations undertaken at the time show that the following comments were submitted:

Wiltshire Council Archaeology	Object
Wiltshire Council Conservation (Central)	Express concerns and require more detail
Wiltshire Council Drainage Engineer	Object
Wiltshire Council Ecology	holding objection
Department of Children Services (Education)	All schools full (Christ Church could extend)
Wiltshire Council Highways	Recommend refusal – range of reasons
Historic England	Express concerns that need to be addressed
Wiltshire Council Landscape	Object
Natural England	Object information submitted is inadequate
Wiltshire Council Spatial Planning	Proposal is inconsistent with WCS Core Policy 2 and the spatial strategy for the town set out in WCS Core Policy 7. There are concerns about the effects of developments on the Bradford on Avon SAC in connection with Core Policy 50. Also effects on air quality, traffic and educational capacity will have to be critically assessed.
Wiltshire Council Landscape & Arboricultural Officer	Object
Wiltshire Council Urban Design	Object
Wiltshire Council Waste Management Team	Object (Includes reference to poor waste vehicle access on approach roads)

As this proposal for 42 dwelling differs from the earlier application only by a reduction in housing numbers the Town Council considers that there can be no justification for approving the present application.

BOATC 31 10 2019

19/09800/FUL.

Comment following debate at TC Planning Committee meeting 05 November 2019:

Decision Refuse:

The site adjoins Fitzmaurice Primary School which has accommodation for some 300 children plus staff. The position and configuration of the access to the site introduces significant additional traffic movements only 20 metres from the school gates that represents an unacceptable risk to the children and other pedestrians. There is a 2.8 metre pinch point part way into the site and this together with inadequate on-site turning space will result in vehicles either reversing into or out of the access. This is also a serious safety hazard. The lack of on-site casual parking will add pressure onto the access road to the further detriment of highway safety. Refuse and other large vehicles waiting on the access road to serve additional dwellings, as proposed, is not acceptable.

This proposal fails to comply with Policy H1 of the Bradford on Avon Neighbourhood Plan which states that:

Proposals for infill development will be supported where they make a positive contribution to the town and are in keeping with their surroundings. Proposals for development within existing residential curtilages will be required to:

- compliment the scale and development pattern of the locality in which they are sited
- demonstrate that vehicular access and parking are adequate, safe and convenient
- provide private amenity space for existing and new dwellings
- not adversely affect the amenity of neighbouring properties
- ensure that adequate garden space to existing dwellings is retained in relation to setting and amenity

In this case vehicular access and parking are inadequate and unsafe.

There is inadequate private amenity space

The amenity of the school (and number 12 B Frome Road) are adversely affected

Thus the proposal represents significant overdevelopment of the site.