Dear James and Michelle,

(An ‘open’ letter to James Gray MP and Michelle Donelan MP, sent by email on 29th May 2015, regarding the national planning process particularly as it relates to north-west Wiltshire and with specific regard to the recent Planning Inspectorate decision on ‘land north of Bath Road, Corsham’)

The Planning Inspectorate’s Appeal Decision on planning application 13/05188/OUT (appeal ref: APP/Y3940/A/14/2222641 - Land North of Bath Road, Corsham, Wiltshire SN13 0QL) was published on 27th May 2015. The decision was to allow the appeal and grant outline permission for up to 150 dwellings and a 1,394 sqm commercial building.

Thirty-three (21 to 53) paragraphs in the Housing Land Supply section proceed to describe the status, particularly with regard to the number of dwellings, of proposed developments throughout north-west Wiltshire from Malmesbury, through Chippenham to Trowbridge, Warminster and Westbury. Adjustments to given numbers are made in order to arrive at valid numbers and in paragraph 27, the Inspector states*: On balance, having regard to all the circumstances, I do not think that the lack of reference to the review in the Council’s Local Development Scheme amounts to a sufficient change in circumstances to warrant adopting a housing requirement for the NWWHMA (north and west Wiltshire housing market areas)* ***other than that set out in the Core Strategy****. For the purposes of this appeal I agree with the Council’s position which is that the supply needed in the NWWHMA to accord with the Framework is 6,468 dwellings.*

My point in highlighting this paragraph is that the Inspector is supposedly taking the housing requirement set out in the Core Strategy (CS). The 6,468 dwellings identified are, as indicated, for the whole of north and west Wiltshire. The figures for Corsham are shown in the following CS table:

|  |  |  |  |
| --- | --- | --- | --- |
| Area | Requirement 2006-2026 | Housing already provided for | Housing to be identified |
|  |  | Completions 2006-14 | Specific permitted sites | Strategic sites | Remainder to be identified |
| Corsham Town | 1,220 | 549 | 341 | 0 | 330 |
| Remainder | 175 | 199 | 45 | 0 | 0 |
| Community area total | 1,395 | 748 | 386 | 0 | 330 |

Paragraphs 128, 129 and 131 of the Appeal Decision then go on to discuss this 330 figure. Para 128: “*The appellants did not disagree that it seems likely that 330 will be exceeded, perhaps well before the end of the plan period*”. Para 128: “*The Council argued that, having participated in the CS process, the expectation of the community is that this* (the requirement of 330) *is what should happen*”. Para 131 (paraphrased): “*In allowing the appeal there would be some prejudice to a plan-led planning process within the Corsham community are*a”. Not half! What is the point in spending years producing a strategy, which included a wealth of consultation, when any or all planning applications are allowed to prejudice it?

Not only this but having looked at the broad, north and west Wiltshire, picture in this Appeal Decision, **the Planning Inspector fails to look at the specific, local situation**.

With regard to west Corsham alone, the April 2014 Housing Land Supply Statement and the adopted Core Strategy do not take into account the following, **already approved**, brownfield developments:

|  |  |  |
| --- | --- | --- |
| Development | Status | No of homes |
|  |  |  |
| GreenSquare, Pound Mead  | Completed March 2012 | 43 |
| West Point development, Westwells de facto number | HLSS states 23 in 2014/15 but total number (not included in HLSS ‘completions’) is 39 | 16 |
| GreenSquare, Spring Tinings | Completed March 2014 | 17 |
| Royal Arthur de facto number | HLSS states 221 but actual number is 247. Development to be completed in 2016 | 26 |
| GreenSquare Rudloe ‘renaissance’ | Planning applications 14/04482 & 04484/FUL approved. Probable completion in 2016 | 11 |
| The old dairy, Priory Street | Application N/12/03980/FUL approved and under construction. Completion in 2015 | 5 |
| The old police station, Priory Street | Planning application 14/10498/FUL approved | 10 |
|  |  |  |
| TOTAL  |  | 128 |

Neither is the Pound Mead development included in the ‘completions’ figure, for 2006-2014, for Corsham in the HLSS. Nor does the HLSS or Core Strategy take into account the following brownfield planning application which has **not yet been approved** but which has the support of the local community:

|  |  |  |
| --- | --- | --- |
| Development | Status | No of homes |
|  |  |  |
| Ex RAF Rudloe No 2 Site, Westwells Road | Planning application 14/11354/OUT registered on 3rd December 2014 | 180 |

The total of these ‘not taken into account’ developments is 308, a figure that leaves a housing requirement of just 22 for the plan period to 2026.

In addition, there is an error in Appeal Decision paragraph 53 which states:

“*Finally, I note that since the Inquiry the Council has permitted housing development on two sites at or near Corsham, amounting to 152 dwellings. However, it would not be appropriate simply to add that figure to the supply – that would be tantamount to changing the base date of the HLS exercise. Moreover, some of these units are already accounted for in the HLS figures. The Council and the appellant have agreed that the correct base date for this appeal is 1 April 2014. If any later base date were used it would be necessary to review all the elements of the HLS exercise”.*

The figure of 152 is made up from the 88 homes approved at Rudloe (Hannick's 13/05724/OUT) and the 64 homes approved at Potley (de Vernon's 14/04179/OUT). **Neither of these is "already accounted for in the HLS figures**".

 With just a little local knowledge and a cursory read, I have spotted omissions and a significant error in this Appeal Decision. I would imagine therefore that there may be many more.

What trust can the people of Corsham have in a planning system that fails to take into account the overwhelming local opposition to this application (274 letters or emails), the Wiltshire Core Strategy (with all its consultations) which has been years in production, the Corsham Town Council Strategic Plan and Wiltshire Council planners’ refusal of the application? And then we have a Planning Inspectorate decision that contains significant omissions and errors.

Sincerely

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