**Planning application 15/10519/OUT – Redcliffe proposal for 170 homes etc at Bradford Road, Corsham -** a representation

**The previous application (14/04179/OUT) and the Planning Inspector’s ‘Appeal Decision’**
The ‘new’ Planning Statement of October 2015 from GL Hearn states in para 1.1 of the INTRODUCTION: “*The appeal was dismissed on the basis that the Inspector considered that it was necessary to require an “appropriate assessment” under the Habitat Regulations “to be carried out before a decision can be made as to whether the scheme would have an unacceptable effect on the Bath and Bradford on Avon Special Area of Conservation*” and in INTRODUCTION para 1.2: “*The further work required to enable an appropriate assessment has now been undertaken and therefore an outline planning application has been resubmitted for the same development as originally proposed in the outline planning application 14/04179/OUT*”.

However, this rationale is simplistic and incomplete. Paragraph 14 of the Planning Inspector’s 18th August 2015 Appeal Decision states: “*Although survey information for a full year is now available for the appeal site on its own,* ***there is not sufficient information to conclude that there would be no significant effect when the appeal scheme is considered in combination with other projects or developments in the vicinity****. In which case it is necessary to require an appropriate assessment for the appeal scheme to be carried out before a decision can be made as to whether the scheme would have an unacceptable effect on the Bath and Bradford on Avon Bats Special Area of Conservation*”.

It is the “in combination effects” for which an appropriate assessment is required. And given that three (Hannick, Gladman and part of the Frampton Copenacre site) of the five other local projects/developments are only in the outline planning stage with reserved matters, such as layout, yet to be determined and the other two (Framptons at the Rudloe No 2 Site and Hanson’s Bradford Road mine) have not yet been decided, there will be, at an appropriate time (when decisions are made and/or layouts are known), the need for an “appropriate assessment”. This assessment for all west Corsham sites, in combination, must be made by Wiltshire planners along with Natural England.

Neither the letter nor the spirit of the Planning Inspector’s decision can be adhered to if each site is taken in isolation.

**Moving away from ‘bats’ to the supposed housing requirement**

Wiltshire Council’s Planning Consultation response dated 12th November 2015 states: “*We can advise of an immediate housing need of* ***74*** *households seeking affordable housing in Corsham and the surrounding community area. The need for affordable housing has a tenure split of 60% Affordable Rented and 40% Intermediate Housing*”.

There are current permissions for 247 homes in west Corsham (150 from the Gladman development, 88 from Hannick and 9 from Green Square at Rudloe) which all have a 30% social housing requirement giving a total of **82** already-approved affordable homes. So, the affordable housing requirement for Corsham and the surrounding community area is already more than satisfied by the three approved developments. There is no requirement for a further development.

**Confused and confusing documents; ‘clashing’ plans; sustainability**Justhow much of the information in the supporting documents is valid? While paragraph 7.16 of the ‘Report to inform a Habitat Regulations Assessment’ states: “*The entire 220m of dry stone wall which runs north to south across the site* ***will be removed*** *under the development proposal*”, the ‘Summary of Bat Survey Results and Proposed Mitigation’ states in para. 4.4: “*The dry stone wall that runs north to south across the site* ***will be retained*** *and repaired. Two sections of the wall will be removed for access roads*”. The first document is dated January 2015 and the second October 2015 but if (much of) the information in the first document (and other documents) is now invalid or has been superseded, why is it still included in the resubmission? How is the reader supposed to know which information in which document is valid? And if much information has changed, then this is not a re-submission but a new application.

The Design and Access Statement of October 2015 continues to expound (falsely) the merits of Corsham over towns such as Melksham with “*The town centre is thriving, whereas many others, such as Melksham, are struggling*”. Would this be misinformation, disinformation (deliberate) or just plain ignorance? National businesses such as Nationwide, NatWest and HSBC have all withdrawn from Corsham, the last just weeks ago (October 2015), indicating that they see no future for the town. Similarly, local businesses have gone: Higos Insurance Brokers have closed their Corsham office concentrating their business in Calne and Devizes; the best restaurant in the town, Cinnamon and Madison ladies fashion have closed recently; the small Martingate Precinct has two empty premises and two charity shops indicating a town in decline and the Wiltshire College Corsham Enterprise Centre, also in the Precinct, closed its doors in 2014. Corsham has one small, expensive supermarket (the Co-op); Melksham has two superstores (Sainsbury’s and Asda), three supermarkets (Waitrose, Aldi and Lidl), one farmers’ superstore (Countrywide) and a department store (Leekes).

It is all very well trumpeting the outward expansion of the Corsham settlement but without a vibrant town centre, Corsham will be just a large, satellite conurbation with residents of existing and new developments creating more pressure on our roads by using the much better facilities of Melksham, Chippenham, Bath and Trowbridge. If, as Redcliffe indicates, town-centre facilities are a benchmark for development then they should be proposing to build in Melksham, not Corsham.

The above paragraphs lead nicely to Redcliffe’s Transport Assessment which propounds “sustainable modes of transport” (14 times) – walking, cycling and public transport. I would challenge Redcliffe to use any of their sustainable modes to get to a decent supermarket – many, if not most, people in this area now use Melksham for food and other shopping.

Continuing on the transport theme, the document ‘Proposed Site Access onto Bradford Road’ proposes two pedestrian/cycle crossings from the site to the footpath on the north side of the Bradford Road. Many issues arise from this some of which are also applicable to the Park Lane crossing proposal. Perhaps some of these issues could be treated as ‘reserved matters’ but some significant concerns emerge from this proposal:

a. The development site is an ‘island’ sandwiched between two busy roads, Bradford Road and Park Lane. The footpaths and cycleways on these roads are on the opposite side from the development so **every journey, on foot or by bike, must begin and end by crossing these busy roads** (except for the return cycle journey from Corsham on the Bradford Road roadway). The layout here cannot be changed thus giving rise to an injudicious, imprudent transport plan for this development, not a ‘sustainable’ one.

b. The more westerly Bradford Road crossing is proposed just by the bend where the right-of-way across the site joins the road. There is a significant problem with visibility here both for drivers and pedestrians - the proposed removal of two trees will perhaps help but will not solve the problem.

c. The crossing and footpath-widening (north side) proposals on the Bradford Road take no account of the mine development proposed here. The proposed entrance to the mine will coincide, approximately, with the proposed entrance and ghost island right turn lane to Redcliffe’s site. Redcliffe’s proposal to widen the footpath/cycleway clashes with Hanson’s proposal to “retain the bank, wall, scrub and trees” in order to provide a ‘natural’ buffer to the mine buildings and workings.

**Pie in the Sky**

One example of the ‘pie in the sky’ nature of this application is a statement from the Transport and Accessibility section of the Planning Statement which goes as follows: “*It has been suggested that a contribution is paid (as per the Land at Bradford Road, Rudloe permission) towards a strategic solution for traffic issues in Corsham, which would not only mitigate for the additional traffic associated with the proposed development, but also help to reduce the existing/future levels of queuing and delay at both the Park Lane and Bradford Road Junctions with the A4*”. Can anyone out there think of a strategic solution which would, given hundreds of new homes, reduce queuing and delays at road junctions?

With two recently-built, community centres within half-a-mile or so of this development, why is Redcliffe proposing another? The existing centres were built at a cost of £millions; the sensible way forward would be to use these centres to their maximum capability/potential, not to build another.

Further equivocation may be found in the Landscape and Visual section of the Planning Statement with: “*In terms of landscape character, the NPA report concludes that the proposed development would comprise a continuation and expansion of the form of the existing established development patterns of Rudloe and Corsham, which is considered to be in keeping with local landscape character*”. In other words, we propose to build houses on green fields. I often quote Jim Royle, who would, no doubt, say here: “Landscape character my \*\*\*\*”.

**I urge Wiltshire planners to reject this application.**

Sincerely

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Rudloe