

Planning application 17/12270/REM (originally 13/05724/OUT) – land south of the Bradford Road at Rudloe – a representation

1. Introduction

This greenfield application, like the Redcliffe (14/04179/OUT, 15/10519/OUT & 17/06091/VAR) and Redrow (13/05188/OUT, 16/03721/REM & 16/04544/REM greenfield applications between Corsham and Rudloe is an unwanted and, locally, unsanctioned (by the strategies of Corsham Town Council, Wiltshire Core Strategy and the North Wiltshire Landscape Character Assessment) development. There have been more than 400 objections by local people to the Redcliffe, Redrow and (this latest) Bellway applications.

Contrast the Bellway Copenacre (Pickwick Court) development where no one has objected because this is a (necessary) brownfield development. Having successfully (all phase 1 homes were sold within two days of going on the market) ‘developed’ the Copenacre site, locals are at a loss to understand why Bellway would choose to develop an important (see following paragraph) greenfield site when there is another brownfield site (ex RAF Rudloe No 2 Site) within a few hundred yards (and with no builder yet on board) of the subject site with planning permission for 180 homes – this is application 14/11354/OUT from Framptons which was approved in August 2016.

In a 29th January 2018 Times article, we learnt that “England is losing an area the size of Glasgow every year because of a record number of developments on greenfield land. Forests, fields and parks are disappearing under concrete at the fastest rate for a quarter of a century. On average, 170 sq km of greenfield land was built on every year from 2013 to 2016 after the government relaxed planning rules to ease the housing shortage. If the construction of new homes, shops and infrastructure continues at the present pace, an area the size of Greater London will have been built on by 2028.”

Along with the general problem of greenfield development, there are a number of issues with this particular development site which were

not addressed or ignored by the planners in granting outline permission. The issues were outlined in an appraisal prepared for the Northern Area Planning Committee meeting of 16th March 2014 (most of the issues highlighted are still extant and should be considered by the 'new' developer) which may be found at Annex A to this representation. Further, particular issues with the subject REM application are addressed in the following sections.

2. Bats

No proper assessment of the impact of this development on the local bat population was made at the time of the outline application. This was highlighted by Planning Inspector Geoffrey Hill in his report APP/Y3940/W/15/3002731 dated 28th July 2015 as follows: "The Council acknowledge that the developers of the Rudloe (Hannick with 13/05724/OUT) scheme had not been required to submit information to inform an appropriate assessment, but it was said that this was an oversight on behalf of the Council and it should not be regarded as a precedent".

The Bat Activity Survey of the subject reserved matters application from BSG Ecology dated December 2017 cannot be regarded a sufficient survey of typical bat activity at this site as the first (and major) 'activity month', August, of the three survey months was the coldest and wettest for thirty years.

Of all the local development sites, this is the closest to the Box Mine Site of Special Scientific Interest (SSSI) of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and therefore should have been (and should be) the subject of a much more rigorous assessment.

3. Bradford Road trees

The 40-odd trees that border the northern perimeter of the site along with the trees along the southern border of Corsham School Broadwood Site form a somewhat unique canopy over the Bradford

Road in the summertime. There are very few such canopies on Wiltshire's arterial roads (see photo).



The Arboricultural Method Statement by James Fuller dated December 2017, identifies twelve individual trees and eleven tree groups. The report, in its tree works schedule, **recommends the removal of just three trees and four groups** yet the Ecological Appraisal Report dated December 2017 from BSG Ecology states: “Much of the tree line along the north-western boundary will be removed to provide the main Site access and associated visibility splay. Some small areas of scrub will also be removed”. The Covering Letter dated 2nd January 2018 also confirms this substantial removal.

The removal of this tree line will have a significantly detrimental effect on the local landscape but for the impact of the whole development (including the commercial part) see the following sections.

(The following sections address a significant issue which has been ignored by the planners. This issue was also highlighted in a

representation on 17/07028/REM the 'sister' (commercial) development on this site)

4. The Landscape and Visual Impact of this Development

In granting outline permission through application 13/05724/OUT (to which scores of local people objected), no consideration was given in the developer's Landscape and Visual Impact Assessment (LVA) or by Wiltshire Council to the loss of significant 10- and 16-mile views across the Clay Vale to the Marlborough Downs and Salisbury Plain.

Wiltshire's Core Strategy in Core Policy 51 states: "Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design ..." It then goes on to list nine aspects of landscape character that should be conserved. One of these nine is "Important views and visual amenity".

The LVA was deficient in a number of respects. Its summary stated "the significance of landscape effect for the construction of the proposal is assessed to be negligible". However, its selection of viewpoints was ill-considered. Viewpoint 8 (on the footpath between Springfield Close and Bradford Road), at 137m above sea level, is by no means at the highest point of this footpath which is 146m above sea level behind, for example, nos 56-66 Springfield Close. At this, higher, point is where we have the 10- and 16-mile views across the Clay Vale to the Marlborough Downs and Salisbury Plain. These views and their significance are discussed and illustrated in this document.

The North Wiltshire Landscape Character Assessment (here: http://www.wiltshire.gov.uk/north_wiltshire_landscape_character_assessment_2004_volume_1.pdf) part 4.194, **Key Views management strategy** states: "The gently sloping topography of this area offers expansive views of both urban areas and the rural landscape. Views from key footpaths could be developed. Views from the A4 are important and clear separation between settlements needs

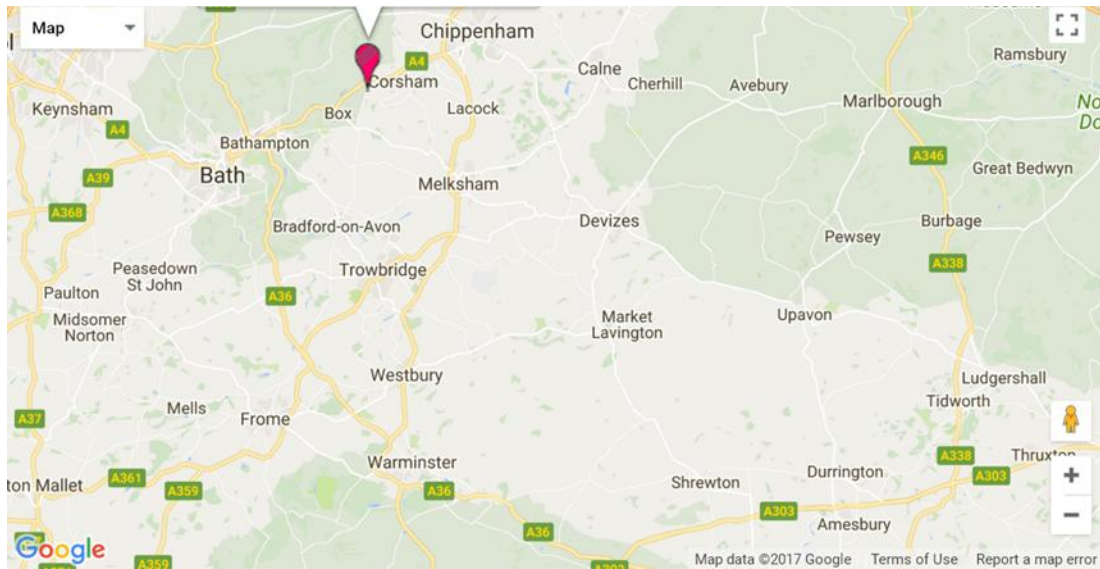
to be maintained eg between Corsham and Rudloe.” This does not specifically mention the Springfield Close/Bradford Road footpath but the principle of “key footpaths” at Rudloe is introduced.

5. Wiltshire’s Cotswolds or ‘Stone Belt’

The classic text *The Geology of Wiltshire* by R.S. Barron, in its chapter 2 *Wiltshire’s Cotswolds*, quotes from H.J. Massingham’s *Cotswold Country* as follows “We speak of it as a band or belt of rock laid across the back of England from the coast of West Dorset where it reaches the sea and up in a north-easterly direction through east Somerset to become, after taking a slice of north-west Wiltshire, the massif of Gloucestershire.”

The escarpment of this ‘slice’ stands sentinel over the Clay Vale which extends as far as the Marlborough Downs and Salisbury Plain with extensive views to both.

The map below shows, in green, the Cotswolds (top left), Marlborough Downs (top right) and Salisbury Plain (bottom) and gives some indication of the extent of the views which can be had across the Clay Vale and Pewsey Vale (bottom right). The pink ‘pin’ at the edge of the Cotswolds shows the approximate location of the subject planning application.



And the following map, taken from *The Geology of Wiltshire* illustrates the land of the Vales (including Vale of the White Horse as well as the Clay Vale) below 91.6m (300ft) and the land of the Stone Belt and Marlborough Downs above 91.6m (300ft).



Fig. 3.1. Vales resulting from land below 300 ft, 91.6 m

There are relatively few locations where an observer may take in the easterly and southerly views from the escarpment of the Stone Belt. This is why it is important to preserve those views that we do have.

At the edge of the Stone Belt, at 95m, lies Gastard House at Chapel Knapp from which the following photo was taken across the Clay Vale with the Marlborough Downs and its western escarpment at Oliver's Castle on the horizon. Note that this view (which is 'zoomed') is from private land; there is no equivalent view from publicly accessible land.



Moving south-west across the escarpment of the Stone Belt, the next location with a view across the Clay Vale to the Marlborough Downs (and Salisbury Plain and Pewsey Vale) is Wadswick Lane at around 130m above sea level. The escarpment of the Marlborough Downs at Oliver's Castle can be seen at centre-left in the photograph below.



Further south-west and on to Norbin Barton on the South Wraxall-Kingsdown Road at 120m above sea level. There is an uninterrupted view here across the Clay Vale into Pewsey Vale with the Marlborough Downs to the left and Salisbury Plain to the right. The escarpment of the Marlborough Downs at Oliver's Castle is at the centre of the picture.



Higher now, at 162m on the Kingsdown-Monkton Farleigh Road and the following zoomed shot again show the view across the Clay Vale to the Marlborough Downs at left and centre with Pewsey Vale and Salisbury Plain to the right.



And finally to a location higher (at 183m) on the Stone Belt escarpment at Monkton Farleigh, we have the following zoomed view of the Marlborough Downs and its escarpment at Oliver's Castle.



So what do these viewpoints have in common? Well firstly, they enable long-distance views across a substantial part of Wiltshire; they are the only publicly-accessible viewpoints (apart from the Chapel Knapp viewpoint, which is private) on the Stone Belt escarpment. The views are not just of space, but of time across the Jurassic Clay Vale and the Cretaceous lower and upper greensand of Bowden Park and Bromham and the lower, middle and upper chalk of the Marlborough Downs. But significantly, none of these viewpoints is easily accessible to a casual observer. For most of north-west Wiltshire's population, they have to be reached by vehicle.

6. The significance of the Rudloe viewpoint(s)

In part 2. (all) the viewpoints from the Stone Belt escarpment were shown except two. The missing two are, in many respects, the most significant as they are the only viewpoints from public footpaths. These are the Rudloe viewpoints. One of these viewpoints is from the A4 footpath at Rudloe Firs (at 146m above sea level) – this viewpoint

is discussed, inter alia, in the 1st September 2017 article on the rudloescene website here:
<https://www.rudloescene.co.uk/news/bradford-road/>. And this is the viewpoint mentioned in the North Wiltshire Landscape Character Assessment discussed earlier.

The other viewpoint is from the footpath behind Springfield Close and above the Bradford Road (also at 146m). This viewpoint is discussed in **The Landscape and Visual Impact of this Development** above. This is the important view that will be denied by the subject development.

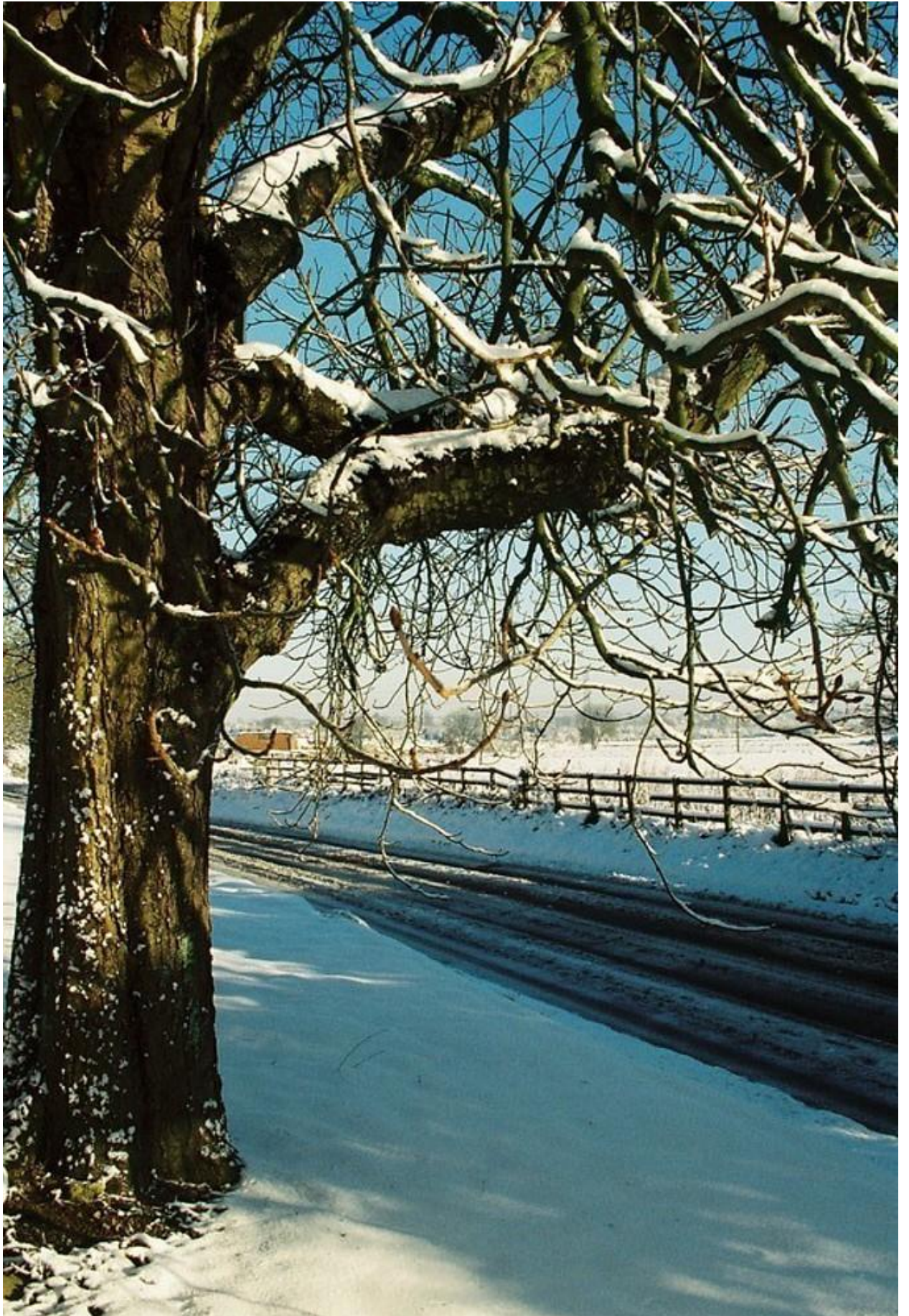
No apologies for repeating that these Rudloe viewpoints provide the only distant views of the Clay Vale, the Marlborough Downs and Salisbury Plain **from public footpaths**.

The following photographs taken from the footpath behind Springfield Close across the development site are:

- a. Dawn over the Clay Vale and the view to Salisbury Plain
- b. A zoomed summer view of Oliver's Castle and the western escarpment of the Marlborough Downs
- c. An eastern sunset over the Clay Vale
- d. Winter view towards the Marlborough Downs at the turn of the century







These are, without doubt, “important views” as designated in Wiltshire’s Core Strategy Policy 51.

7. The damaging effect of the subject development(s)

It is the irony of ironies that the developers of this site have quoted from the National Planning Policy Framework (NPPF) as follows: “Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit”.

The “sense of place” that the people of Rudloe (and elsewhere in Wiltshire of course) have is established through the landscape and views thereof. What better sense of place could be had than to sit atop the escarpment of Salisbury Plain at the site of the Westbury White Horse or atop the escarpment of the Marlborough Downs at Oliver’s Castle with the North- and West-Wiltshire landscape set out before you?

The views mentioned in the preceding paragraph are, of course, towards the west. But what of the eastward views? Well, these are the views that are the subject of this document, from the Stone Belt at Wadswick, Kingsdown, Monkton Farleigh and Rudloe across the Clay Vale to the Marlborough Downs and Salisbury Plain. These views contribute to our “sense of place”.

The next photograph was taken at around the turn of the century from the footpath behind Springfield Close with the view across the Clay Vale to the Marlborough Downs. And the following photograph is an ‘artist’s impression’ of this same view including the steel-clad buildings of the ‘sister’ (commercial) development of the subject development.





8. Conclusion

Insufficient attention (actually, no attention) has been paid by the developers, and indeed by Wiltshire Council, to the value of “view” referenced in Core Policy 51. Dozens of pages in planning, design and access statements are given to quoting from the NPPF and Core Strategy but nothing describes the reality of a modern estate (with no particular Cotswold features) and a 7.6 metre-high steel-clad building (in the ‘sister’ development), of a type that can be found anywhere in the world, blocking an important view.

But it’s not just the current generation that will be denied these delightful views, it will be all future generations. Effectively, these views will be lost forever.

Clearly, in the current climate of development at all costs, important values are being ridden roughshod over, trampled upon, lost. The

North Wiltshire Landscape Character Assessment's judgment that "Views from key footpaths could be developed. Views from the A4 are important and clear separation between settlements needs to be maintained eg between Corsham and Rudloe." has been lost completely in this lemming-like scramble.

Insufficient (indeed no assessment in the case of the outline application) assessments have been made with regard to bat activity at this site which is the closest to the Box Mine SSSI of all the local developments.

In view of the exigencies of the planning system, there is no going back on the approval for this development. However, I would hope that the parameters (position, scale, height etc) of the proposed buildings could be changed (perhaps creating a 'sunken' development) in order that this generation's, and future generations' "sense of place" can be maintained.

Sincerely

Paul Turner
29 Springfield Close
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Wilts SN13 0JR

30th January 2018

Annex A follows

An appraisal of planning application 13/05724/OUT Hannick Homes - land south of Bradford Road, Rudloe by Paul Turner/Keith Chubb/Juliet Powell for the Save Rudloe Greenfield Campaign

Scores of Rudloe residents have objected to this speculative application which is outside the existing development boundary. We urge the Northern Area Planning Committee to consider the many points raised in the objections which are summarised below. The three local, ex-MoD, brownfield sites are highlighted on this page. Why develop greenfield at Rudloe when there are so many brownfield sites less than a half-mile distant?



← **Copenacre - planning application N12.00836.OUT**

This 5.3 hectare brownfield site has planning permission (granted in Jul 2013) for 100 dwellings, hotel and old people's home. The site is one third of a mile, as the crow flies, from the speculative Hannick greenfield site where a similar number of homes is proposed.

Ex RAF Rudloe No 1 site (Rudloe Manor, shown below)

7.3 hectares currently advertised by DTZ as Rudloe Campus with likely acceptable uses (subject to planning) for business, industrial, or storage (B1, B2 and B8), Less than a half-mile from the Hannick site.



← **Ex RAF Rudloe No 2 site**

Located just metres from the existing Bath ASU premises and 0.15 miles from the Hannick speculative proposal. This is an eight- hectare development site purchased by tender on 27 February 2014. The year-long roundabout construction in Westwells Road provides a new access to the site. This would be an ideal brownfield location for the 'pharmaceutical hub' proposed by Bath ASU obviating the sequestration of pastureland.





The ‘strategic gap’ between Rudloe/Hawthorn and Pickwick

The aerial photo taken above Rudloe/Hawthorn looking east illustrates the strategic gap with Pickwick and Corsham in the distance. The fields in the foreground are the subject of the speculative Hannick proposal (13/05724/OUT); in the middleground, to the right of the B3109, is the field proposed for development by Redcliffe Homes and in the distance, ‘above’ the B3109, are the target fields of the Gladman proposal (13/05188/OUT). This strategic gap would be maintained through the expedition of developments on ex-MoD sites. The waiving of section 106 payments for brownfield sites could bring this about.

The Rudloe housing requirement

In March 2013, Wiltshire County Council published the *Rudloe Housing Needs Survey*. The survey’s findings were based on questionnaires delivered to every one of the 565 households in Rudloe. The conclusion of this survey was that ten new subsidised homes and one new sheltered home were needed in Rudloe over the next three years.

GreenSquare housing association is acting on this requirement through a proposal to increase housing density on Rudloe Estate. Up to twenty new homes are proposed with preliminary work already having commenced.



More detail on the derelict Copenacre site

The ex-MoD Copenacre site remains a blot on the landscape following its closure in 2010. Planning application 12/00836/OUT for up to 100 dwellings, old people’s home and a hotel was granted in July 2013. With so much speculation at Rudloe and Pickwick, it seems that the time is right to waive 106 payments for brownfield sites. This would:

- provide a significant incentive for developers
- enable unsightly derelict sites to be developed more easily
- more quickly create rate-paying communities and ...

Hopefully save greenfield sites from speculators.

The entrance to the Hannick housing development is dangerous →

The proposed entrance, between two blind bends, to the housing element of 13/05724/OUT is not viable notwithstanding the proposed ‘visibility splay’. The entrance would join the B3109 at a point in centre-right of the photo.

This road is heavily used by 32-tonne motorway maintenance trucks, 44-tonne trucks delivering cereal to Nestle at Staverton, four service buses per hour, heavy agricultural machinery from Freemans at Box-fields and much more heavy traffic as well as passenger vehicles.

An illogical, ghost island, right-turn lane is proposed to this 88-home estate. Why not have such a lane at the 350-home Rudloe Estate entrance just around the corner?



← The site of the proposed entrance on a quiet Sunday

The attractive canopy here is the only one of its kind on the Bradford Road between Pickwick and Bradford Leigh. It will be totally destroyed by the Hannick proposal.

The development is isolated from the pedestrian and cycle routes into Corsham. The Rudloe - Corsham path is on the opposite side of the B3109 from the development so whether using the proposed vehicular entrance (site shown in photo) or the ‘by-way’ entrance in Skynet Drive, the B3109 must be crossed twice (out and back) to get to/from Corsham.

As well as a vehicular entrance, an unregulated pedestrian crossing is proposed at this location, again necessary because of the site’s isolation. Worryingly, this is the site of an accident on 13 December 2013 when the road was closed for two hours.



The Skynet Drive entrance to Park Lane →

The photo at right again serves to illustrate the proposed site’s isolation from the pedestrian and cycle routes to/from Corsham.

Cyclists and pedestrians must cross Park Lane on a blind bend in order to access or leave the footpath/cycleway. No provision whatever has been made for crossing this busy (at peak times) arterial road.

Indeed, this is the very spot where Mrs Kelly, a cyclist from Rudloe was killed some years ago.

The footpath/cycleway does, of course, lead to the ex-RAF Rudloe 2 site in Westwells Road, a brownfield site which has just been sold (on 27 February 2014) for development.





2014 and work has just started on the access road for 03816/11 →

No building work has yet been started on this substantive 2011 application. Moreover, unlike 03816 of 2011, 05724 is **not** a substantive application for business expansion, it is a speculative application, not from Bath ASU but by an entity by the name of Masrich Executive Pension Scheme (MEPS).

There is, apparently, an underlying objective for the creation of a pharmaceuticals or life sciences hub close to the existing Bath ASU premises. However, given the extremely slow progress of the substantive 2011 application, this ‘hub’ is a remote aspiration for the MEPS beneficiaries as landlords of the site.

With so much commercial property available for purchase/rent and brownfield available for development, Rudloe must not lose greenfield to speculation.



← Bath ASU

Planning application 03816 of 2011, which was not objected to by Rudloe residents, was for a substantive expansion of Bath ASU’s business. In that application, Bath ASU gave seven fundamental business reasons why the company could not operate over two separate sites. Application 03816 therefore specified a premises which would be **physically attached** to the existing premises.

Now, in 2013/14, Wilts CC Spatial Planning department, in its support of 05724 (the subject application), said: “*Bath ASU will be able to construct new facilities on the site to compliment their operations and support meeting the needs of their ongoing business growth*”. This statement has been echoed by others supporting this application, Corsham Town Council for example.



← There are many potential sites for a pharmaceuticals hub

There is no business or planning imperative to lose greenfield at Rudloe for a pharmaceuticals hub but there is an investment imperative for MEPS and its principals. We should not sacrifice greenfield to provide for executives’ pensions.

Invest in Wiltshire currently advertises 135,000 sq ft of commercial properties in the Corsham area. Brownfield sites are or will be available at ex-MoD sites at Rudloe, indeed one of these is just a stone’s throw from Bath ASU.

At Methuen Park South in west Chippenham (but in Corsham Parish) the pictured 1.3 hectare site (larger than the proposed Bath ASU greenfield site) has been vacant for years. The 2011 *Wiltshire Workspace and Employment Land Review* (the Tym Report) stated that any any undersupply in Corsham (not that there is!) could be met in Chippenham. This site is just 10 minutes away from Rudloe.