Dear James, Box Parish Council, local councillors and Wilts CC planners, (Woodhead, Tim (tim.woodhead@wiltshire.gov.uk); Peter.White@wiltshire.gov.uk Wilts CC (peter.white@wiltshire.gov.uk); Simon Smith (simon.smith@wiltshire.gov.uk); James Gray (New) (jamesgraymp@parliament.uk); Box Parish Council (mailbox@boxparish.org.uk); Councillor Richard Tonge (richard.tonge@wiltshire.gov.uk); Sheila Parker - Wilts CC (sheila.parker@wiltshire.gov.uk ) Note that the planner addressed should have been chris.marsh@wiltshire.gov.uk not tim.woodhead

There was an interesting exhibition at Corsham Primary Woodland School regarding the proposed Bradford Road development (North Wilts constituency) by Hannick Homes. Thanks to Hunter Page representatives and Nick Cleverley, a director of Hannick for their time and patience. For the benefit of all who haven't seen the proposals, I have attached photos of the exhibition.

Rather than make my comments to Hunter Page, as requested, via the provided form, I will address them to James Gray MP, Box Parish Council, local councillors and selected Wilts CC addressees (the last here to answer the planning questions contained within this email) with copies to agents and developers. The reason for this addressing is that I would like to meet with Mr Gray and local councillors to discuss this proposal.

I am being rather previous here as the Gladman exhibition about the Bath Road development in Pickwick (Chippenham constituency) is not due until Thursday but the points made below are about strategy so are or will be relevant to both developments. If any further issues arise following the Gladman exhibition, I will send a supplementary.

There are, no doubt, many planning technicalities that my critique below will fall foul of but this is a layman's view and I have attempted to address the issues from that perspective. Rather confusing for the layman is the relationship between the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Land Supply Statement (HLSS). One of Hannick's stands included the following statement, "The site has been identified as being suitable for development within Wilts CC's SHLAA". However, the purpose of the SHLAA is not to allocate sites for future development. Rather, it identifies potential land where future development could be undertaken. The sites within the SHLAA are taken forward when producing documents which allocate development sites  i.e. Core Strategies, Neighbourhood Plans and Site Allocations documents, and it is at this stage that the potential sites are more thoroughly assessed and consulted on. This site is not contained in the HLSS. The Pickwick site is included neither in the SHLAA or the HLSS. I have indicated in the list below which sites are included in which document and the number of dwellings proposed.  My fundamental (layman's) question here is therefore, why has pre-planning been undertaken with Wilts CC with a view to developing planning applications on the Bradford Road and Bath Road sites?

The Rudloe/Hawthorn area is already being over-developed. The following lists some of the the recent, and future developments (including probables) in the Rudloe/Hawthorn and Hudswell/Pickwick localities:

* MoD Basil Hill. This £billion development took a good five years to complete.
* Katharine Park. 644 (I believe) homes built here within the last ten years
* (Brownfield) Large, now derelict, RAF Rudloe Manor No 2 site - various developments have been proposed here but none, as yet, has come to fruition (332 homes could be built here - see below). *In the HLSS (29 dwellings)*.
* (Brownfield) Former RNSD Copenacre (Hartham) site. 121 homes proposed here but depends on the development option finally accepted. *In the SHLAA - site 137 (121 dwellings).*
* (Brownfield) Former RAF Rudloe No. 1 site south-western side. Possible development here - scores of homes possible.
* (Brownfield) Former Flamingo Club. Eleven houses and two apartments are proposed. *In the HLSS (13 dwellings)*.
* (Brownfield) Two- or three-hectare parcel of land below Stephens Plastics in Westwells Road. A development was proposed here by Ashfield Land some years ago but is in abeyance it appears (it is not included in the SHLAA but, according to Wilts CC, should be). This land is the plot in front of the former HMS Royal Arthur site which, itself, is the subject of a development proposal.*Royal Arthur (not the brownfield land in front) is in HLSS (221 dwellings)*.
* (Brownfield) Former explosives factory at Westwells. Around 34 homes under construction. *Not in SHLAA or HLSS*.
* (Brownfield) Rudloe Renaissance by Greensquare. About 25 homes proposed on the existing Rudloe Estate, increasing density. *Not in SHLAA or HLSS.*
* (Greenfield) Land adjacent to the Bradford Road at Rudloe (the Hannick site). Eighty homes and commercial premises proposed. *In SHLAA - site 799.*
* (Greenfield)  Land below the (brownfield!) Copenacre site, adjacent to Guyers House and Academy Drive (the Gladman site). One-hundred-and-fifty homes and office accommodation proposed. *Not in SHLAA or HLSS.*

Whether sites are included in the SHLAA, the HLSS or neither and whether they are included in the Core Strategy or Local Plan (and whatever other planning documents are relevant) and whether any document is relevant if developers can just go ahead and propose developments outside these planning documents is very confusing to the layman. Could Wilts CC Planning cast light on the relationship between the planning process, its documents and the current proposed developments?

Anyway, enough development already! According to one of Hunter Page's exhibition panels, "The emerging Wiltshire Core Strategy identifies a need for at least 475 additional dwellings to be provided within the Corsham area over the period 2013 - 2026". The above list shows that, even excluding the brownfield sites at the top and bottom of Westwells Road, the total homes in the pipeline on brownfield sites in the Hawthorn/Rudloe neighbourhood alone, within the wider Corsham area, is 443.

However, let's indulge in some speculation. Up to 230 houses are proposed for the two greenfield sites by Hannick and Gladman - 8.57 hectares and 3.8 hectares respectively for homes at Bath Road and Bradford Road, a total of 12.37 hectares - and a total of 2.6 hectares at both sites for office/commercial development. However, the brownfield Rudloe No 2 site alone is 11.06 hectares and the brownfield Copenacre site (development area) is 4 hectares. So, these two brownfield sites could swallow all the proposed greenfield development and satisfy almost half the Core Strategy 13-year identified housing need. Looking at it from a slightly different angle, with the existing Copenacre proposal at 121 homes, at this same density 332 homes could be provided on the Rudloe No 2 site (why only 29 dwellings are proposed here in the HLSS is a mystery) giving a total of 453 homes. Along with the 72 brownfield homes under construction or proposed at Westwells and Rudloe Estate, a total of 525 homes could be provided in Rudloe/Hawthorn alone. This neighbourhood could therefore be providing 110% of the Core Strategy 13-year identified housing need for the wider Corsham area from brownfield sites. So why propose building on greenfield sites in the same area? See attached map showing the brownfield Rudloe No 2, Copenacre, Rudloe No 1 (possible) and Westwells (possible) development sites.

Now, turning to the large commercial premises proposed at both the Bath Road and Bradford Road sites, may I pose the simple question why? At present, we have a number of commercial/industrial parks in the Westwells/Hawthorn/Pickwick area. Of these, only the Park Lane Industrial Estate has full premises occupancy. Premises at Pickwick Park remained largely unoccupied for many years; even now, 25% of the units are available to rent. At present, there is 24,300 sq ft of light industrial/warehouse space in five units available for rent at Leafield Industrial Estate and 8,815 sq ft available in four units at Fiveways Trading Estate (for information, see: <http://www.estatesgazette.com/propertylink/browse/industrial-corsham-to_let.htm>). In addition Corsham ASU which at present has a rented unit at Fiveways will be expanding into a much larger premises in the adjacent greenfield with an entrance in Park Lane under a separate (not the subject) planning application, apparently facilitated through Hannick Homes.  Also, at the Hannick exhibition, locals were being kept in the dark with regard to the nature of the proposed commercial unit. Mr Cleverly would not (or perhaps could not, as the development is speculative) reveal for whom the premises were intended - see the following paras which discuss the subject of local people being treated, effectively, with contempt (excuse my frank language). From the layman's viewpoint, with so much commercial property available for occupation (and local employment), there can be no reasoning the proposed greenfield commercial developments. However, the housing/commercial mix provides a capital return (for the housing) and a continuing return from rental (for the commercial property). This 'solution' is perfect for the developer but rides roughshod over local requirements and sensibilities.

The government's National Planning Policy Framework (NPPF) discusses the 'pre-application' process which, with the two subject developments, we are going through at the moment (in spite of my reservations about this whole can of worms).  We were told at the Hannick exhibition that meetings had been held with Wilts CC, Greensquare and Corsham Primary School about the proposed Bradford Road development whilst the Wilts electorate "who all matter" (to paraphrase the Wilts CC slogan) are kept in the dark. No minutes are kept of these meetings and no information is available through the FoI process. In many (probably most) cases, the officials of housing associations, schools and businesses are not 'local' so plans are being formulated by people who do not have real local knowledge or experience. This is certainly the case with developers and agents - Hannick and Hunter Page being, respectively, Swindon and Cheltenham companies. This lack of local knowledge has been realised through two local projects, one of which has ended in tears with the other being a thorn in the side of locals. Wilts CC is now looking for solutions to the turn-of-the-century £million Rudloe Community Centre project because the project was not properly thought through and not enough weight given to solid local opinion. Similarly, the new school entrance on the Bradford Road was formulated by outside officials, one of whom at a specially-convened Governor's meeting did not know where Skynet Drive was (we were sitting just 50 metres from it).

With the current proposals, outside agencies are pushing their own agenda. Hunter Page's two initial questions on their comment form are, "Do you agree that there is a need for more development at Rudloe/Corsham?" and "Do you agree that the site is capable of being developed?". These are 'leading questions' - I could have passed out my own form which would have included a variation on the National Lampoon characterisation of Richard Nixon, "Would you trust these outside agencies to really take note of your opinions?".

The government's Core Planning Principles set out in the National Planning Policy Framework includes the following:

* take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it
* encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value

These values are reflected in the North Wiltshire Local Plan which states, "Development in the countryside will only be permitted if it supports farming, the rural economy, rural communities and countryside based activities". I guess that the proposed commercial/office space at both greenfield sites is a sop to satisfy the "the rural economy" condition as well as being a fine investment for the developer. Whatever strategy we have is, it appears, being determined not by frameworks, principles, plans, community or the public good but by transactions between landowners and purchasers. Planning documentation, rather than providing a clear road to good development, just appears to muddy the waters. So, do we have principles, a plan and a strategy or not? The current proposed developments certainly do not satisfy the Core Planning Principles or the Local Plan. If we really are talking about a strategy which would benefit local communities, we should address the issue of the development of local brownfield sites rather than diverting resources and energy to proposed developments that are outwith the principles and plans. And therefore throw out the subject proposals before they even get off the ground.

With regard to actioning the points raised here, could I request that Wilts CC planners respond to the particular planning issues I have raised. Could I also propose a meeting or meetings between myself and local councillors (hopefully addressed above) who should be concerned about these issues, and Mr Gray. As I am retired, I am available at any time; perhaps we could meet 'on the hoof' strolling around the sites in question; ending up in the pub of course.

Yours sincerely

Paul Turner

29 Springfield Close

Rudloe

Corsham SN13 0JR

01225 810408

07803 295291