Chris Marsh, Planning Officer,

Wiltshire Council,

Economic Development and Planning,

Monkton Park, Chippenham,

SN15 1ER

Dear Chris,

**Planning Application 13/05188/OUT; land north of Bath Road, Corsham SN13 0QL**

The following objection to the subject development is offered in the sincere hope that this deplorable, speculative proposal will be refused by Wilts CC planners.

**Introduction**

**Gladman**

Gladman’s ‘About us’ webpage has, what appears to be, a pejorative banner: “Gladman is one of the UK’s leading private companies in speculative development”; its first paragraph emphasises the point with “Gladman is committed to pure speculative development”. I thought this boast was extraordinary until I realised to whom its webpages are aimed – landowners out to make a quick profit at the expense of local communities.

Gladman’s website lists 34 current projects across England and both its methodology and developments are formulaic. Given the current NPPF and Localism situation, Gladman has been riding roughshod over local councils and communities and relying on Government to override council refusals and community objections.

This type of speculative development should not form any part of the growth of Corsham, or indeed any community.

**The Planning Statement and other documents**

The Planning Statement from Planning Prospects on behalf of Gladman Developments uses the word “sustainable” 47 times. The word “sustainable” is used 137 times in all supporting documents. Its use to such an extent illustrates that it is just a throwaway buzzword which has become meaningless. As long as four years ago, a national newspaper editorial said the following about use of the word sustainable. “*The use of the term is often questionable and it has become so common that it has been robbed of meaning. Linked to anything from development to transport, housing or communities, 'sustainable' is a word whose very looseness and lack of clarity makes it a perfect prefix for any activity where approval is being sought”.*

**The narrow scope of the supporting documents**

The narrow scope and theoretical nature of the documents supporting this planning application can be illustrated with the Transport Assessment. The document talks of TEMPRO, TRICS, TRL, PICADY, ARCADY and RFC whilst in the real world, scores of vehicles are already using ‘rat runs’ to avoid the A4 at peak times. The (scale of) usage of these avoiding routes has not been considered in the Transport Assessment. In addition, no thought has been given to a significant factor militating against the proposed eastern entrance to the development. For a more detailed assessment of the real world transport situation, see my arguments against their supposed ‘sustainable travel’ assertion below.

Apart from the covering Planning Statement, the developer appears to have almost forgotten that a 1,400 sq ft commercial unit has been tagged on to this application - there is hardly any mention of it in the supporting documentation. What is this for? Unlike former times when there were specific reasons to build for emerging industries (agriculture and associated industries, cloth, stone, railways), this proposal and the other proposed development just half-a-mile away at Rudloe include speculative, apparently purposeless commercial blocks merely because they are ‘the flavour of the month’. Why did we see no commercial block with Katherine Park or with the Copenacre proposals? I indicate in the main text that, like the tower blocks of the sixties and seventies, these current ‘housing plus commercial unit’ developments will be regarded with disdain in years to come (in fact they are regarded with disdain now).

**Responses to assertions made in planning application documents**

The following assertion is made in the ‘Planning Statement’:

**“*The proposed development is both high quality and sustainable. Corsham is a sustainable location for some growth*.”**

This is simply untrue. I believe that present health resources (doctors, dentists etc) are already stretched towards or at capacity. Corsham’s town centre is small with, for example, one small supermarket, one butcher, one bookshop, two newsagents, two High Street pubs, one hotel and so on. The description “an affluent town centre” indicates that Planning Prospects have not really done their homework. Other towns of similar size have far more High Street retail/hotel/pub/restaurant resources. Compare Frodsham in Cheshire (with a smaller population), recently visited by yours truly and not too far from Gladman’s base at Congleton, which has far more facilities than Corsham. So how and why is Corsham sustainable for growth? Furthermore, the transport situation alone (see assessment below) advances a strong case against speculative development.

Another assertion:

**“*The development will provide much needed affordable and market housing in accordance with the policy requirements.”***

Much needed? The latest figures for Corsham have been published as part of the Examination in Public in ‘examination document 63’ (Housing Land Supply Statement – April 2013) (<http://www.wiltshire.gov.uk/corestrategydocument?directory=Examination%20Documents&fileref=96>). The figures confirm that 239 dwellings are still required in Corsham by 2026. However, this does not include the Copenacre site or the recently released ex-RAF Rudloe Manor No 2 Site which, between them, could and undoubtedly will satisfy this requirement for the wider Corsham area. \*

Regarding the RAF Rudloe Manor No. 2 Site, in 2009 and 2011, Sarah Morgan and Ellen O’Grady, senior town planners with Defence Estates (now Defence Infrastructure), commenting on Wilts County Council’s planning webpages with regard to development west of Corsham, said the following:

*“RAF Rudloe No. 2 site is previously developed and accessible and therefore should receive priority for housing development. The site also benefits from existing established residential uses in the form of MoD living accommodation.”*

*“The Rudloe site provides a significant opportunity to deliver sustainable mixed use development in Corsham on previously developed surplus public sector land, and its redevelopment should take priority over the development of greenfield land.”*

I doubt if there is another part of the country with so much brownfield land available within such a small area. Sooner or later (certainly by 2026), these brownfield sites will be developed, so why develop greenfield sites to the west of Corsham? If greenfield developments are allowed, west Corsham, Rudloe, Hawthorn and Westwells will be blighted by urban sprawl.

\*source: emails from Wilts CC Spatial Planning – October 2013

Another assertion:

**“*The B1 offices will provide employment accommodation for the local area and generate a minimum of 99 jobs.”***

Unfortunately, this proposed development, along with all others in the country follows a formulaic, second-decade-of-the-21st-century pattern of dwellings plus B1 development. Look just half-a-mile up the road to the speculative Hannick development – exactly the same formula. Gladman and Hannick appear not to believe in their own ‘hype’. If the formula ‘homes plus development’ is designed for local employment, why incorporate 170 parking spaces in the commercial areas?

No doubt, like the high-rise debacles of the 60s and 70s, this formula will be regarded with disdain in decades to come. Why would people want to buy a house or live next to commercial premises? Moreover, around 150,000 sq. ft. of commercial/industrial/office premises are currently being advertised (November 2013) through EG (Estates Gazette) at Leafield, Fiveways, Park Lane and Moon (Box Hill) industrial estates, Pickwick Park, Hartham Park, Spring Park, Martingate Centre, Overmoor Farm, The Old Malthouse and Rudloe Campus. Why build more speculative commercial premises with all this current spare capacity in the Corsham area alone?

The last-mentioned site above at RAF Rudloe No. 1 Site is another enormous brownfield site with permissions which also has potential for scores of homes and commercial property. Indeed, part of this site is currently, in Nov 2013, being advertised by DTZ as “Rudloe Campus, an 18.5 acre brownfield site for commercial/industrial development.”

Another assertion:

**“The development sensitively addresses site development issues including such matters as access, sustainable travel, flood risk and drainage as well as taking on board such matters as ecology and landscape setting.”**

Locals know full well that these development issues have not been sensitively addressed! The proposed site access opposite St Patrick’s Church is not viable. Mass on Saturday evenings and Sunday mornings, christenings, weddings and funerals see long lines of cars parked on the A4. Drivers of vehicles leaving the proposed entrance for Corsham and beyond will naturally look right and could then be faced with a bus or 44-tonne truck coming at them on the wrong side. There is inherent danger in this proposed access point.

Sustainable travel? **The big picture is far from sustainable**. Local people are extremely concerned about current traffic levels on the A4 and at its roundabouts and junctions. Commuters face long lines at peak times at the Pickwick roundabouts, the Cross Keys lights and the west Chippenham A4 roundabouts. Easton Lane is being used as a ‘rat run’ between Corsham and Chippenham, particularly at peak times, bringing problems to walkers, cyclists and the inhabitants of Easton and Westrop. On 3rd December, I monitored the traffic using Easton Lane between 16:45 and 17:45. The total number of vehicles entering/leaving Easton Lane was 141. This is, of course, a winter figure – in summer, with lighter nights, usage is higher. This situation militates against **any** further development in Corsham (or Chippenham for that matter). Look at what has come to pass with the Basil Hill development in Hawthorn. Whilst the major roads (A4, A360, B3109) were envisaged as the access routes, the ‘rat runs’ through Potley, Moor Green and Westwells are being used.

Apart from local traffic issues, all developments east of Bath increase traffic problems in Bath, Bristol and the country lanes used as ‘rat runs’.

Our region’s road infrastructure, apart from the M4 and its access roads, remains the same as that used by previous generations – it is essentially a rural network. It was never designed to, nor should it, cope with the demands being placed on it by incessant and excessive urban growth. Typifying the problems that growth and the rural road structure bring is the example of our regional, international airport, Bristol. The airport has no railway or motorway links. All taxis travelling to the airport from east of Bath (and presumably from Bath itself) use the lanes through, for example, Chew Magna and Winford creating traffic chaos in these small communities. The reason for this is, of course, that the main routes are already beyond capacity. For every one of my taxi journeys to Bristol Airport in the last ten years (and this is a considerable number) the ‘rat run’ route has been taken.  **Is that a sustainable situation for our regional airport, the communities along the ‘rat runs’ and the airport’s users?**

Similarly, the Royal United Hospital (RUH) lies on the ‘wrong’ side of Bath for its catchment area of North West Wiltshire. Developments east of Bath will increase ambulance journeys to Bath RUH. Sirened ambulance journeys are already a curse along the rural A4 where sirens can be heard as far away as Weavern Lane (perhaps 2 or 3km from the A4) on numerous occasions each day. Sirens travelling past Ashley, through Box and up Box Hill can be heard at considerable distances for minutes on end throughout the By Brook Valley and on its hillsides. In restaurants and elsewhere along the standard route for ambulances in Bath: The Paragon, George St, Gay St and Queen Square, I have calculated from experiences in restaurants along the route, siren frequency as ‘two per meal’. The more development to the east of the city, the more traffic along the A4 into the city, the more ambulance journeys across the city and the more disquieting everyday life becomes.

In terms of the long-term **sustainable** (apologies)future access to the RUH and a peaceful life along the A4 and in the city, development should be targeted to the west of Bath (or the RUH moved!). An example of such development would be the former Cadbury’s site at Keynsham.

The general point is, of course, that given the current traffic levels on major routes and the ‘rat run’ situation, Corsham and Chippenham **are not sustainable** for speculative growth**.**

**Theoretical assertions do not bear close scrutiny - examples**

There are many aspects to the supporting documentation which, whilst making fine theoretical assertions, do not stand close scrutiny and do not reflect the real world situation. Just two examples follow.

The bat transects study, bat survey report and associated tables, for example, constitute 22 pages, 38 pages and 13 pages respectively – a total of 73 pages - clearly, a significant site of bat activity. How much bat activity (and how many pages) does there have to be before development is unviable?

Unacceptable noise levels can be mitigated, according to the Noise Assessment Report. But with increased traffic levels (with, for example, the development of Copenacre and ex-RAF Rudloe No. 2 Site), increased acceleration noise levels (by virtue of the proposed roundabout), increased reflection levels between buildings on both sides of the A4, this section of road will become more than unacceptably noisy for residents (both existing and proposed). From my own experience, further up the A4 opposite Copenacre where I have an allotment, the level of traffic noise is astonishing even on a Sunday. Indeed, a small development directly on the A4 just above Traveller’s Rest has remained unsold for three years, partly I am sure, because of the traffic and noise situation.

**Conclusion**

With future brownfield developments west of Corsham at Royal Arthur, Copenace and RAF Rudloe No. 2 (and No. 1) Site, there is absolutely no requirement for speculative greenfield housing developments in the same area. The proposed greenfield developments would take housing numbers over the stated requirement and create an unwanted urban sprawl west of Corsham.

There is no need for speculative commercial development, particularly not alongside housing developments. In November 2013, 150,000 sq ft of commercial space is being advertised in the press in the wider Corsham area.

Given the current traffic levels on major routes and the ‘rat run’ situation, Corsham and Chippenham are not sustainable for speculative growth.

I have not discussed this in the text above but others have made the point that the site of the proposed development is productive, grade 2 agricultural land which is a relatively rare commodity with only a fifth of the UK agricultural land base attaining this quality.

**Baldwin’s**, “The sounds of England, the tinkle of hammer on anvil in the country smithy, the corncrake on a dewey morning, the sound of the scythe against the whetstone, and the sight of a plough team coming over the brow of a hill, the sight that has been in England since England was a land, and may be seen in England long after the Empire has perished and every works in England has ceased to function, for centuries the one eternal sight of England” **is gone and is now superseded by**, “The twinkle in the eyes of landowners and developers who have discovered cash cows over the brow of the hill. Communities and local planners cut down by the scythe of central government viewing not centuries but five-year terms. Grey blocks on every street corner as a reminder of a time of barbarism and infamy.”

The statements and figures given elsewhere in this document, taken from current official and other sources, show that there is no requirement for speculative housing or commercial development in Corsham**. Could I therefore request that Wilts CC planners refuse this planning application.**

Sincerely

Paul Turner

29 Springfield Close

Corsham SN13 0JR