Please find attached an appraisal (the .pdf file) from the Save Rudloe Greenfield Campaign of issues relating to planning application 13/05724/OUT - 'Land south of Bradford Road, Rudloe' which is one of the agenda items at this Wednesday's (12th March) Northern Area Planning Committee meeting. Much of what follows in this covering email evaluates what we believe to be significant aspects of the Case Officer, Chris Marsh's *Report to the Northern Area Hub Planning Committee*. This email is also attached in the form of a Word document which may make printing (if required) easier.

Through the multiplicity of policies in the Core Strategy and the North Wiltshire District Plan (13 references given in Mr Marsh's Report), it appears to be possible to argue that black is white and vice versa. This lobbying email will therefore concentrate on the de facto situation as seen through the eyes of local people, some who have lived in this area all their lives and others, like myself, who are relative newcomers having resided here for just 40 years. Locals care deeply about this area. There is no older CPRE 'Litteraction' group than The Rudloe Mob which was founded in 1979. And no (CPRE) group throughout the country has picked up anywhere near the amount of litter that Rudloe locals have. The Rudloe Mob's CPRE Litteraction webpage is here: <http://www.litteraction.org.uk/the-rudloe-mob>. We care!

In addition, Rudloe has its own website which is not only a source of news for locals but is also a repository of articles about and photographs of Rudloe and other localities. Indeed, there are around 1,000 photos now on the site. The 'News', 'Rudloe' section here: <http://www.rudloescene.co.uk/news-1/rudloe/> contains a number of articles about application 13/05724/OUT - those dated 13th January 2014, 5th January 2014 (showing 7 of the 63 objections made by local people), 17th December 2013 (with X-rated video produced by a local resident), 13th December 2013, 7th December 2013, 22nd November 2013, 27th October 2013 (with maps of the Hannick site and the ex-RAF sites), 6th October 2013 (with tree map and 11 photos of what will be lost if this speculation is approved), 30th September 2013 (with table taken from the Core Strategy), 29th September 2013, 8th September 2013 and 'June 2013' are particularly relevant.

In addition, the 'Localities', 'Rudloe' page here:  <http://www.rudloescene.co.uk/localities/rudloe/> contains a number of articles and photo galleries. The galleries 'Skyscapes at Rudloe' dated 3rd March 2014, 'Views of Rudloe including Leafy Lane Wood and Bradford Road' (129 photos - start at the end to see pics most relevant to 05724) and 'A gallery with more sun' (72 photos) may be of interest. We live in an extraordinarily delightful part of the country. And this is the reason why we feel so passionate about saving greenfield.

Looking now in more detail at Mr Marsh's r*eport,*it is noted in section 9, *Planning Considerations*, that "the housing element of the proposal is not supported by current planning policy" and "major residential development should be permitted only on an exceptional basis either as a wholly affordable housing scheme or as identified through a neighbourhood plan". As no "exceptional" circumstances have been established, why then does Mr Marsh say "in the immediacy it is necessary to take a reasonable view on the individual merits of the scheme"? What is the immediacy? There is no immediacy other than the requirement of the speculators and landowner to secure a 'deal' which will make them millions. The Hannick/Masrich speculation here **and** the Redcliffe Homes 170 dwelling speculation just a few hundred metres away **and** the Gladman 150 dwelling plus commercial block speculation (13/05188/OUT) a few hundred metres beyond that **and**with the bid acceptance by Defence Infrastructure of the 19-acre RAF Rudloe No 2 site on 27th February for development, the immediacy is that we have a plan in place which looks at the overall picture and not have a piecemeal, first come first served approach to development.

Indeed, with the announcement by Planning Minister Nick Boles on Wednesday 5th March - reported in The Telegraph on Thursday here: <http://www.telegraph.co.uk/earth/greenpolitics/planning/10679048/Developers-to-get-incentives-to-build-new-homes-in-towns-and-cities.html> that "*Developers of brownfield sites will no longer have to pay tens of thousands of pounds of fees under the Community Infrastructure Levy, under changes to the National Planning Policy Framework"*and "*Companies which agree to build new homes on brownfield land will also not have to have to provide so many council homes in new housing schemes*" and "*We want to use every inch of previously developed land to meet the housing need",*a pathway has now been opened (as proposed in our attached appraisal) for developers to make much faster headway with brownfield sites. This makes all the more "immediate" a requirement to take a step back and look at West Corsham/Pickwick/Rudloe/Hawthorn as a whole. Copenacre, RAF Rudloe No 2 site and RAF Rudloe No 1 site could now, much more quickly/easily, provide **all** the housing and commercial development land requirement for the plan period to 2026. Mr Marsh's "policy-compliant housing schemes should be approved without delay" in the paragraph commencing "It is acknowledged ..." on page 7 of his report is invalidated on two counts. Firstly, the NPPF has changed and secondly, as he himself says in his first paragraph of part 9, "the housing element of the proposal is not supported by current planning policy".

Now moving to what Mr Marsh, in his penultimate and last paragraphs on page 6 under the earlier heading Principle of development, calls "a **significant material consideration**", that is "to consider the representations of Town and Parish Councils and to ascribe to these a degree of weight in directing new development ... the acceptance of the proposal by elected local representatives is a significant material consideration". With the greatest respect to Mr Marsh, these paragraphs are completely misguided. One of our registered speakers at the Planning Committee meeting will devote his entire three minutes to this subject. Just to give a flavour of our speaker's piece ... the Save Rudloe Greenfield Campaign conducted a petition/survey exercise taking in about 75% of the 565 Rudloe dwellings. This survey produced the following results with regard to the Hannick development: 3.8% for; 3.5% don't know;**92.7% against**. There are 63 objections from local people on the Wilts CC 05724 webpage. So one wonders how Hunter Page's (the agent) *Planning Design and Access Statement*, in para 7.4 can state: "There appears to be a good level of local support for this application"?

The paragraph (in Principle of development) commencing "Prior to the Core Strategy" states that there is "an immediate housing shortfall of around 150 dwellings within the Corsham Community Area". What is "immediate" about it? This shortfall is taken from the Core Strategy table identifying the housing requirement for Corsham Town for the period until **2026**. The "around 150" is arrived at from the table figure of 475 less 221 at Royal Arthur and 100 at Copenacre. However, this figure of 150 does not take into account the 39 homes being built at West Point at Westwells, the (up to) 20 with the increased density at Rudloe Estate, the 17 at Spring Tynings being built by GreenSquare and the 20 (estimated) on the current Corsham Library site and Corsham Police Station sites after their moves to the Corsham Community Campus. West Point and Spring Tynings are almost complete, preliminary work at Rudloe Estate has started and there will, no doubt, be a number of developers only too keen to take on the vacated Corsham sites. The total here is 96, so in fact only around 54 homes are required in the designated period until 2026. RAF Rudloe No 2 site could easily provide these.

In the last paragraph of Principle of development on page 7, Mr Marsh says that certain considerations "tip the balance" in favour of the development. It's good to know that there is a balance to be tipped! So, let's tip it the other way ... His "identified need for housing", for the people or Rudloe was detailed within the March 2013, Wilts CC, *Rudloe Housing Needs Survey*which identified a requirement for ten new subsidised homes and one sheltered home in Rudloe over the next three years. As stated above the GreenSquare housing association proposes to fulfill this need (and more) through an increase in housing density on Rudloe Estate where it will build up to twenty homes. Indeed, preliminary work on this project has already started. Mr Marsh’s "local reception" (of the Hannick speculation by the people of Rudloe) which through Hannick/Hunter Page's glossy misrepresentation, he took as positive is, in reality, extremely negative (as detailed above).

In the first paragraph of Landscape and visual impact, Mr Marsh states that the "impact of the development on the character and appearance of the site itself is acknowledged to be substantial" and in the second paragraph that the landscape designation is "clearly a significant consideration" but then says "The North Corsham Special Landscape Area and the Cotswolds AONB are restricted by tall perimeter tree line vegetation growing along the northern site edge". What Mr Marsh does not appear to appreciate, perhaps because it has not been made clear in Hannick's documents, is that this complete 100-metre (plus) line of trees and vegetation will be removed to enable the proposed ghost island right-turn lane (discussed in page 3 of the attached appraisal), visibility splay and footpath between the development and Skynet Drive to be accommodated. The impact is thereby made even more substantial and significant (and detrimental).

The last page of the attached appraisal is devoted to Employment and the Masrich Executive Pension Scheme's (not Bath ASU) speculative greenfield proposal. As indicated, a pharmaceutical/life sciences hub can easily be accommodated at, for example, the adjacent former RAF Rudloe No 2 site or the long-vacant 1.3-hectare site at Methuen Park South. A major point here is that, in their 2011 substantive planning application (13/03816/FUL) for expansion of their business, Bath ASU gave seven fundamental business reasons why the company could not operate over two sites. Also, the potential to create a "number of jobs" with 05724 is far-fetched given the lack of progress with substantive application 03816 - three years on and no jobs have been created from this application. And the figures for the number of jobs appear to have been plucked out of the air. In his submission on 05724, Mathew Croston, Senior Development Officer at Wilts CC Economy and Regeneration said "over 30 jobs will be created", Hunter Page's *Planning Design and Access Statemen*t said: "It is anticipated that 60 new jobs would be created directly by this proposal" and now the Case Officer's report has, in paragraph 2 of Employment, expanded this figure to "over 100".

In both Planning Considerations and Employment, the diurnal or daytime in-migration of workers to this area is mentioned. In order to fully appreciate the scale of this in-migration, it is necessary to, for example, stand at Rudloe Fiveways at morning rush hour to see the volume of vehicles arriving from the south-west. This volume, which formerly consisted of traffic destined for Leafield Trading Estate and MoD employers/Corsham Media Park in Westwells Road amongst others, has increased dramatically since the opening of MoD Corsham at Basil Hill in 2012. Basil Hill employs around 1,850 people and the rapidly-expanding company Ark Data at Spring Park employs scores. RAF Rudloe No 2 site has just been sold and will no doubt, given the recent relaxations for brownfield sites in the NPPF, be brought into the local planning 'brew' fairly soon for both housing and commercial development. The commercial aspect will, of course, add to the aforementioned diurnal in-migration. Why then exacerbate this problem (and it is a problem) with even further development on greenfield sites? If a pharmaceuticals/life sciences hub is required locally, then let's aim to put it at RAF Rudloe No 2 site and save the Rudloe greenfield. The only downside to this would be the loss of pension provision for Masrich but that should not be a material consideration in the planning process.

Just seven of the sixty-three objections to this speculation are mentioned above. They are given as typical examples of locals' objections and may be found in the 5th January 2014 article in the 'News', 'Rudloe' section of the Rudloe website here:  <http://www.rudloescene.co.uk/news-1/rudloe/>. These objections make reference to other, significant points not mentioned here and so we would urge members of the Northern Area Planning Committee to read them.

And finally, just a small point, in Site Description, Mr Marsh says "the fields have most recently been used for the cultivation of a bio-fuel crop of fast-growing miscanthus grass". This is incorrect - this field has never been planted with miscanthus. For many years it has been down to pasture but before the turn of the century was arable - see picture no 23 in 'A gallery with more sun' - referenced above.

This email and attached appraisal has been Cc’d to the 50 members of the Save Rudloe Greenfield Campaign and others with an interest in this speculative application.

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**Save Rudloe Greenfield Campaign**