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DevelopmentmanagementNorth

From: Sidney Alford
Sent: 02 December 2013 15:53
To: Marsh, Chris
Subject: Planning Application 13/05188/OUT

41A Pickwick,
Corsham,
Wilts. SN13 OHX

2nd December, 2013

Chris Marsh, Esq.,
Development Control Officer,
Wiltshire

re Application No. 13/05188/OUT

Dear Mr Marsh,

1. This application for planning consent is motivated neither by national need, nor by local community desire, but by a simple desire for personal enrichment by a greedy landowner on the one hand and a remotely based company which admits its own motivation and definition with surprising clarity: "Gladman Developments are continually seeking to acquire more land for commercial developments throughout the UK" and "A formidable, skilled and highly professional Land Promoter, obsessed with winning consents" .
2. This site must surely be one of the least appropriate in the environs of Corsham for the construction of houses and offices. A beautiful view to the north of the A4 will be greatly abused.
3. There is no need or excuse for such encroachment on agricultural land, whose degradation would be irreversible, when "brown field" areas already exist within the area.
4. With empty office space in the area, it does not need another 37 x 37 square metres more.
5. A large proportion of the present inhabitants of Corsham are already new arrivals: another five hundred would hardly be socially desirable for an established community.
6. The supporting services in the area are already stretched: to obtain a non-urgent doctor's appointment can take more than a week, and schools are already full.
7. There is no space for the A4 to be simply widened and provided with an extra lane or two and it is already congested. The inevitable contribution to this congestion would have a significant effect on existing commuters. The Corsham Town Council's unanimous rejection should be heeded seriously.
9. The planners should give some serious consideration to the licensed explosives store and test site which, for the past thirty years, I and my company, Alford Technologies Ltd., have been operating with little objection from local people, but which would lie in embarrassing proximity to this proposed development. The legal and financial implications to both parties – the developers and my company – should be considered.

Yours faithfully,

Sidney Alford

DevelopmentmanagementNorth

From: Robert French
Sent: 02 December 2013 15:51
To: Marsh, Chris
Cc: Macrae, Alan; cllr.abosley@corsham.gov.uk
Subject: Planning Application 13/05188/OUT Land to the north of Bath Road, Corsham
Attachments: Gladman_13_05188_OUT_Objection_Robert French.pdf; Gladman_13_05188_OUT_Objection_Robert French.docx

Dear Chris,

As a resident living at 17 Swan Road, Corsham I wish to submit an objection to the outline planning for 150 dwellings and commercial development on land to the north of Corsham by Gladman Developments Ltd (13/05188/OUT).

Please find attached my objection letter in word and pdf. format for your consideration.

I trust this would be forwarded to the relevant planning officers and please feel free to contact me if you have any queries regarding the reasons for my objection.

I would be grateful if you could confirm receipt of this objection letter.

Kind regards,

Rob French

(17 Swan Road, Corsham, T 01249 716774)

Chris Marsh
Planning Case Officer
Development Management
Wiltshire Council
Monkton Park
Chippenham
SN15 1ER
chris.marsh@wiltshire.gov.uk

Robert French
17 Swan Road
Corsham
Wiltshire
SN13 9LT

02/12/2013

Dear Chris,

Planning Application 13/05188/OUT Land to the north of Bath Road, Corsham

- 1.1 Further to the outline planning application 13/05188/OUT by Gladman Developments Ltd, I wish to submit an **objection** as a local resident living within close walking distance to the proposals.
- 1.2 The land to the north of Corsham between Rudloe and Pickwick is cherished by my family and many local residents who appreciate the importance of this site in terms of the spatial separation it provides between the settlements of Pickwick, Corsham and Rudloe; the landscape setting of the designated Pickwick Conservation Area; and the open character of the footpath leading through to Pickwick Lodge Farm and Collett's Bottom Woods within the By Brook Valley and the Cotswold Area of Outstanding Natural Beauty (AONB).
- 1.3 You are probably aware that the public footpath forms part of a popular circular walk for local residents between Pickwick, Pickwick Lodge Farm and Middlewick Lane to the north of Corsham and also connects to the Macmillan Way following the By Brook Valley within the Cotswold AONB. The proposals would fundamentally diminish the spatial openness, landscape character and visual amenity of the public footpath (CORM 75) leading through the fields to the north of Corsham that is currently enjoyed by my family and many others within the local community.
- 1.4 There are clearly a number of issues associated with this outline planning application that have not been addressed by the developer in terms of the housing requirement, principle of development, settlement coalescence, housing layout and design, and the impacts on landscape and visual amenity, ecology, heritage and traffic that would result from these proposals.

1.5 I therefore request that Wiltshire Council resolves to **refuse** this outline planning application by Gladman Developments Ltd with reference to the following planning policies:

1.6 Emerging Wiltshire Core Strategy (2006 – 2026) policies:

- Core Policy 1 Settlement Strategy;
- Core Policy 11 Corsham Community Area;
- Core Policy 51 Landscape;
- Core Policy 52 Green Infrastructure;
- Core Policy 57 Ensuring a high quality and design and place shaping; and
- Core Policy 58 Ensuring the conservation of the historic environment.

1.7 North Wiltshire Local Plan 2011 (Adopted 2006) policies:

- NE4 Areas of Outstanding Natural Beauty (AONB);
- NE11 Conserving Biodiversity;
- NE14 Trees Site features and the Control of New Development;
- NE15 The Landscape Character of the Countryside; and
- HE1 Development in Conservation Areas.

1.8 The reasons for my **objection** to these proposals are set out below:

Housing Requirement

1.9 The land to the north of Corsham is not located within the settlement boundary or allocated for housing within the North Wiltshire Local Plan (Proposals Map, Sheet1A) and the Emerging Core Strategy (Figure 5.6, Corsham Community Area). The site therefore does not form part of Wiltshire Council's future plans for residential growth and should be viewed as an unnecessary incursion into the countryside.

Principles of Development

1.10 A planning application has already been submitted on derelict land at the Copenacre site (N12.008.OUT) directly to the west of the proposals. This derelict land should be brought forward prior to considering any greenfield application within the surroundings of north Corsham. The NPPF is clear on this matter, "*planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land).*"¹

Settlement Coalescence

¹ Paragraph 111, page 26, NPPF

1.11 The proposals are located on land to the north of Corsham that provides spatial separation between the settlements of north Corsham, Pickwick and Rudloe. The development would result in the loss of this spatial separation and would result in settlement coalescence beyond the defensible boundary provided by the A4 Bath Road within the setting of the Cotswold AONB (Figure 1). The proposals in combination with the Copenacre application would form an enclosed development corridor to the north of the A4 detracting from the settlement gateway of Pickwick and north Corsham.



Figure 1 - The proposals would lead to settlement coalescence between Pickwick, north Corsham and Rudloe and would harm the settlement gateway.

Housing Layout and Design

1.12 The Design and Access Statement (October 2013 DAS 5468-01 Rev A) provides a proposal masterplan on page 34. The housing layout would not be deliverable without **major adverse** landscape and visual effects for a number of reasons:

- 1.13 The site access plans (Stirling Maynard dwg.4746/01/01) shows that 90 metre visibility splays would be required on Site Access A and B. This would require the removal of at least 140 linear metres of Cotswold drystone walling considered to be a key characteristic within the Wiltshire Council, 16A Malmesbury-Corsham Limestone Lowland Landscape Character Area (LCA). The removal of this Cotswold drystone walling would harm the landscape character of the settlement gateway leading into Pickwick approaching from Rudloe on the A4 Bath Road (Figures 2 and 3). This has not been fully appreciated within the landscape and visual appraisal.
- 1.14 The proposals would require the removal of mature trees within the site at tree T13 (Oak), T14 (Larch) and T4 (Ash). The removal of mature trees T13 (Oak) and T14 (Larch) would diminish the character of the settlement approach to Corsham and the residential visual amenity of the property on the access to Guyers Lane (Figure 4).
- 1.15 The geotechnical report acknowledges that "*consideration should be given to the volume change potential of the clays and the requirement for deepening of the foundations due to the presence of these due to trees.*"² It is noted that the British Geological Society considers this land to be located within an area of 'high shrink – swell hazard' as shown on the following webpage:
http://www.bgs.ac.uk/science/landUseAndDevelopment/shallow_geohazards/hazardPotentialMapping.html



Figure 2- Site Access A would result in the loss of 60 linear metres of drystone walling.



Figure 3 - Site Access B would result in the loss of 80 linear metres of drystone walling.

² Paragraph 5.2.3, page 15, Opus Phase 1 (Desk Study) Investigation Report

1.16 The proposals therefore do not appear to have taken into account the NHBC guidelines (5.2 building near trees) in terms of tree locations, water demand and soil shrinkage. The housing layout shows the retention of the mature trees particularly at TG8 (5 no. Lime - Figure 5), T17 (Oak), T16 (Lime) and T18 (Copper Beech - Figure 6). However, the housing layout does not provide sufficient standoff distance from the mature trees given the water demand of these tree species and the underlying high shrinkage clay soils. For these reasons the housing numbers proposed within the masterplan would not be deliverable without compromising the future growth and survival of these mature trees. This has not been fully appreciated within the landscape and visual appraisal or arboricultural assessment.



Figure 4 - Trees T13 (Oak) and T14 (Larch) would be removed by these proposals harming residential visual amenity and the settlement gateway.



Figure 5 - TG8 (5 No. Limes) would be harmed through changes in ground conditions, drainage and restricted root growth.

1.17 For example, the following standoff distances ought to be applied for 1 metre depth foundations on high shrink – swell hazard soils as found within this site, in accordance with the NHBC guidelines:

- T16 (Lime) – 19m height; moderate water demand = 16 metre standoff³ from all built development;
- T17 (Oak) – 20m height; high water demand = 27 metre standoff⁴ from all built development;
- T18 (Copper Beech) – 14m height; moderate water demand = 11 metre standoff⁵ from all built development; and
- TG8 (5 no. Lime) – 24m height; moderate water demand = 19 metre standoff⁶ from all built development.

1.18 This illustrates that the housing numbers promoted by the developer would not be achievable without harming these mature trees.

1.19 The proposals do not take account of the overshadowing of tree canopies particularly in relation to T18 (Copper Beech – Figure 6), TG8 (5 no. Lime – Figure 5), T17 (Oak)



Figure 6 - T18 (Copper Beech) would be harmed through changes in ground conditions, drainage and restricted root growth.

³ Table 15, page 14, NHBC Guidelines, Chapter 4.2

⁴ Table 14, page 13, NHBC Guidelines, Chapter 4.2

⁵ Table 15, page 14, NHBC Guidelines, Chapter 4.2

⁶ Table 15, page 14, NHBC Guidelines, Chapter 4.2

and T16 (Lime) located within the centre of the site. This is especially relevant to T18 (Copper Beech) which exhibits dark foliage that would block light and shade residential properties to the north of the housing layout. This would make these residential properties less attractive to any potential buyer.

- 1.20 The proposals would result in trees T5, T3, T2 and TG2 being 'land locked' within private gardens to the east of the site bordering Academy Drive (Figure 7). This is not acceptable as the future maintenance and visual screening between the proposals and Academy Drive could not be secured in the long term by the developer. This would have consequential visual effects on residential properties on Academy Drive within the designated Pickwick Conservation Area.



Figure 7 - Trees bordering Academy Drive would be 'land locked' within private gardens therefore visual screening could not be maintained between the proposals and Pickwick Conservation Area.

- 1.21 The proposed housing density of 30 dph is inappropriate in the context of the heritage assets within Pickwick Conservation Area and the Listed Buildings at Guyers House and the Church of St. Patrick.

- 1.22 The proposed architectural designs as illustrated on pages 38 and 39 of the Design and Access Statement are inappropriate, unsympathetic and do not relate to the architectural character of Pickwick Conservation Area. The proposals appear too geometric in character, are not partitioned by Cotswold drystone walling or beech hedgerows, and roofing materials do not vary between Cotswold stone slate or double roman clay tiles as they should (Figure 8 and 9).
- 1.23 The proposed employment buildings illustrated on page 41 of the Design and Access Statement are hideous. These employment buildings could be located anywhere in the UK. The commercial buildings at Pickwick Park to the south of the proposals (Figure 10) provides a good example of how employment buildings have been integrated within the defensible boundary of north Corsham. The architecture of Pickwick Park contributes to the settlement gateway and this would be harmed by the proposed development.
- 1.24 No lighting strategy appears to have been provided by the developer. Additional lighting would have detrimental effects on the setting of the Cotswold AONB dark skies through additional sky glow, light spill and glare to the north of the A4. This has not been fully considered within the landscape or visual appraisal or ecology assessment.
- 1.25 The location of the Neighbourhood Equipped Area for Play (NEAP) to the south of the proposals would attract children across the busy A4 which is a potential road safety concern.

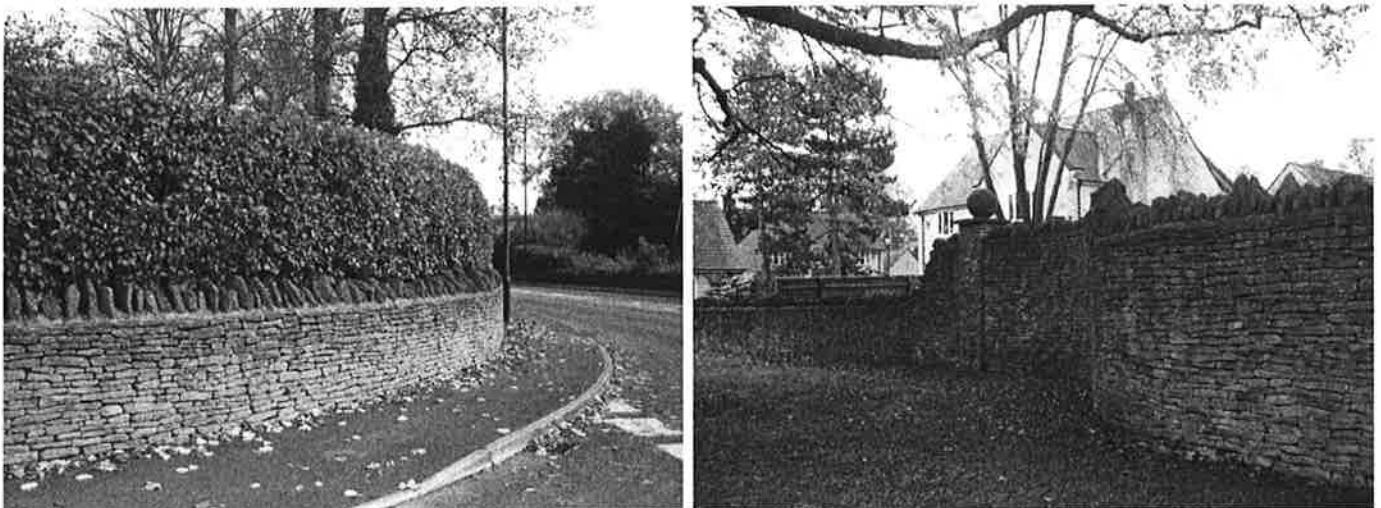


Figure 8 and 9 – The proposals show no intention of sub dividing housing plots with Cotswold drystone walling and beech hedgerows, therefore is not sympathetic to the Conservation Area.

Landscape and Visual Impacts

1.26 The developer has undertaken a landscape and visual appraisal with the effects summarised as follows:

- 'Negligible to Minor Adverse' for LCA 16A – Malmesbury – Corsham Limestone Lowland (paragraph 6.3);
- 'Negligible to Minor Adverse' for residential properties on the northern settlement edge of Corsham (paragraph 6.11);
- 'Negligible to Minor Adverse' for road users on the A4 Bath Road (paragraph 6.12);
- 'Minor Adverse to Minor Beneficial' for the public right of way crossing the site (paragraph 6.13); and
- 'Negligible to Moderately Beneficial' for the Beechfield Nature Area (paragraph 6.14).

1.27 I am deeply concerned with the findings of this landscape and visual appraisal. The methodology defines a "*moderate effect as an effect that is notable but not material in the decision process.*"⁷ This must be incorrect as landscape and visual effects would always be a material consideration with the development of a greenfield site, let alone one that is not within the settlement boundary or allocated for any future development.

1.28 The landscape and visual appraisal does not provide a Zone of Theoretical Visibility (ZTV), wirelines or photovisualisations from sensitive viewpoints, and therefore the assessments could not have been undertaken with any degree of accuracy.

1.29 The developer does not state what height the buildings would be in metres only that "*they will be generally two storey two storeys, with the potential for some 2.5 and 3 storey height.*"⁸ The appraisal also states that, "*the choice of materials will reflect the colours of local brick*"⁹. I do not consider brick to be an appropriate building material within the setting of the Pickwick Conservation Area.

1.30 There are a number of key issues that have not been considered within the landscape and visual appraisal including:

⁷ Paragraph 2.37, bullet 3, page 7, FPCR landscape and visual appraisal

⁸ Paragraph 4.7, page 18, FPCR landscape and visual appraisal

⁹ Paragraph 4.7, page 18, FPCR landscape and visual appraisal

- The cumulative landscape and visual effects of the proposals in combination with the Copenacre application (N12.008.OUT) on derelict land directly to the west of the proposals on the 16A, Malmesbury - Corsham Limestone Lowland LCA and the Cotswold AONB setting;
- The effects of the proposals on spatial openness and settlement coalescence between Pickwick, north Corsham and Rudloe;
- The effects of the proposals on the A4 settlement gateway approaching north Corsham from Rudloe; and
- The night time visual effects of the proposals on the Pickwick Conservation Area, Beechfield Nature Reserve and the Cotswold AONB located only 0.75km to the north of the site at Pickwick Lodge Farm.



Figure 10 – Commercial property at Pickwick Park directly to the south of the proposals has been sympathetically designed on the boundary of the Pickwick Conservation Area and contributes to the settlement gateway of north Corsham. The proposals would detract from the settlement gateway.

Landscape Character

1.31 The independent Wiltshire Landscape Character Assessment (Land Use Consultants, 2005) identified that the proposals are located within the 16A, Malmesbury - Corsham Limestone Lowland Landscape Character Area (LCA). This LCA also covers the land to the north of the site within the surroundings of Pickwick Lodge Farm, Middlewick House, Hartham Park and Biddestone village located within or directly bordering the Cotswold AONB. This independent study therefore demonstrates that the site shares the same key landscape characteristics as the Cotswold AONB situated only 0.75km to the north of the proposals (Figure 11). It is therefore not plausible for the developer to argue that the proposals would have a 'negligible effect'¹⁰ on the setting of the AONB to the north of Corsham. Clearly the proposals would have a harmful, incremental effect on the setting of the Cotswold AONB in combination with the Copenacre application (N12.008.OUT).



Figure 11 – the site shares many of the key landscape characteristics as the Cotswold AONB located only 0.75km to the north of the proposals at Pickwick Lodge Farm.

¹⁰ Paragraph 5.11, Page 20, FPCR landscape and visual appraisal

1.32 The proposals would remove or compromise the following key landscape characteristics of the 16A, Malmesbury - Corsham Limestone Lowland LCA within the setting of the Cotswold AONB. These are highlighted in **bold** below:

- "**Gently undulating lowland farmland** over underlying geology of predominantly mudstone and limestone with some pockets of clay;
- A **peaceful and rural landscape** with subtle variations in character relating to the varied geology, topography and water courses;
- Mix of **permanent pasture and arable farmland**;
- Strong **network of hedgerows with hedgerow trees**;
- **Dry stone wall** field boundaries in some areas and around settlements;
- **Field pattern predominantly large geometric fields typical of eighteenth and nineteenth century enclosure** with small scale irregular fields of medieval pattern close to settlement;
- **More open areas of higher ground to the west offer panoramic views over the type**, elsewhere occasional woodland blocks, copses and frequent hedgerow trees give a greater sense of enclosure, with intermittent views;
- Numerous rivers forming shallow valleys, with the watercourses sometimes lined with willows;
- Settlements in the form of historic market towns, **villages and scattered farmsteads distributed throughout the type** linked by network of rural roads;
- **Traditional buildings of local limestone buildings an outstanding feature**; and
- **Presence of historic parkland and estates marked by stone estate walls, grand entrances and parkland trees and avenues.**¹¹

1.33 I therefore disagree with the developer's findings that the proposals would result in a 'negligible to minor adverse effect'¹² on the 16A, Malmesbury - Corsham Limestone Lowland LCA. The majority of the key landscape characteristics would be removed or compromised therefore the effect would be **major adverse**.

1.34 A key principle of the Guidelines for Landscape and Visual Impact Assessment (GLVIA, April 2013) is that, "*the value attached to undesignated landscape also*

¹¹ Page 149, Wiltshire Landscape Character Assessment (Land Use Consultants, 2005)

¹² Paragraph 5.10, Page 20, FPCR landscape and visual appraisal

*needs to be carefully considered and individual elements of the landscape – such as trees, buildings or hedgerows – may also be valued.*¹³

1.35 I disagree that the site is of 'low/medium'¹⁴ sensitivity as the land to the north of Corsham is highly valued and susceptible to residential development for the following reasons:

- The land provides spatial separation and openness between the settlements of Pickwick, north Corsham and Rudloe;
- The land contributes to the settlement gateway of Pickwick approaching on the A4 from Rudloe, Box and Bath;
- The land is located between designated heritage assets including Pickwick Conservation Area and Listed Buildings at St Patrick Church and Guyer's House; and
- The land is highly representative of the key characteristics within the 16A, Malmesbury - Corsham Limestone Lowland LCA that also extends into the Cotswold AONB located only 0.75km to the north of the site.

1.36 The developer claims that the magnitude of change on Landscape Character Area (LCA) would be 'low'¹⁵. This is a huge understatement given the wholesale removal and alteration of the key landscape characteristics within the site. I consider the effect on landscape character to be **major adverse**.

Landscape Features

1.37 The developer has assessed the effects on landscape features, including trees as 'minor beneficial'¹⁶, drystone walling as 'minor adverse'¹⁷, and the public footpath (CORM 75) as 'minor beneficial'¹⁸. I disagree with these findings based on my earlier objections within paragraphs 1.13, 1.14, 1.15, 1.16, 1.17 and consider that the effects on landscape features would be **major adverse**.

¹³ Bullet 6, page 94, GLVIA (3rd Edition, April 2013)

¹⁴ Paragraph 5.13, Page 20, FPCR landscape and visual appraisal

¹⁵ Paragraph 5.14, Page 21, FPCR landscape and visual appraisal

¹⁶ Paragraph 5.21, Page 21, FPCR landscape and visual appraisal

¹⁷ Paragraph 5.22, Page 21, FPCR landscape and visual appraisal

¹⁸ Paragraph 5.23, Page 21, FPCR landscape and visual appraisal

Visual Amenity

- 1.38 The developer has assessed close range views from the A4 Bath Road as 'minor adverse'¹⁹. I disagree with these findings as views across open farmland towards the mature trees would be enclosed, spatial openness would be removed, and the proposals would detract from the perceived settlement gateway of north Corsham defined by the Roundhouse and Pickwick Park architectural frontages. I therefore consider the effects on the A4 Bath Road to be **major adverse**.
- 1.39 The developer has assessed the views from Academy Drive as 'negligible to minor adverse.'²⁰ I disagree with these findings as the future maintenance of the 'land locked' trees (T5, T3, T2 and TG2) within proposed private gardens to the east of the site cannot be secured by the developer. I therefore consider the visual effects on Academy Drive to be **major adverse** as the visual screening along the boundary of Academy Drive within the Conservation Area cannot be guaranteed by the developer.
- 1.40 The developer has acknowledged that "*users of the derelict Copenacre Industrial Estate (Receptor J) will gain partial views of the western boundary [and that the effects] would be negligible to minor adverse.*"²¹ The sensitivity of the Copenacre Industrial Estate would be **high** as this site forms part of a proposed mixed use and residential development (N12.008.OUT). The developer does not consider the cumulative visual effects (in combination or sequentially) on a person walking along Guyers Lane enclosed by development on either side of the rural lane. The sequential visual effect is likely to be **major adverse** on Guyers Lane as the road would become enclosed by residential development and the spatial openness removed.
- 1.41 The landscape and visual appraisal summarises that "*the development could help to knit together the currently irregular nature of the settlement along the northern edge of Bath Road.*"²² I fundamentally disagree with this statement and contend that the pattern of development and village form of Pickwick would be harmed by these proposals as the A4 currently acts as defensible boundary between Pickwick, north Corsham and Rudloe, and protects the landscape character of the Cotswold AONB from further encroachment.

¹⁹ Paragraph 5.29, Page 22, FPCR landscape and visual appraisal

²⁰ Paragraph 5.33, Page 23, FPCR landscape and visual appraisal

²¹ Paragraph 5.36, Page 23, FPCR landscape and visual appraisal

²² Paragraph 5.40, Page 23, FPCR landscape and visual appraisal

Arboricultural Impacts

- 1.42 The arboricultural assessment does not consider the following issues:
- 1.43 The safeguarding of future root growth beyond the Root Protection Areas (RPA's) that would ensure the future survival and longevity of the mature trees, as advised by BS5837:2012 Trees in relation to construction, demolition and construction. The design of the housing layout has been arranged hard up to the RPA's and therefore constrains the future growth of specimen trees including T18 (Copper Beech), T16 (Lime), T17 (Oak) and TG8 (5 no. Limes). Therefore the housing numbers presented by the developer would not be deliverable as a result.
- 1.44 The risk of tree branch failure over residential properties and public open space has not been fully considered.
- 1.45 The excavation of the balancing pond near the roots of T1 (Lime) on Site Access B has not been fully considered.
- 1.46 The overshadowing of residential properties by trees including T18 (Copper Beech), T16 (Lime), T17 (Oak) and TG8 (5 no. Limes) within the site has not been considered as discussed within paragraph 1.19 of my objection.
- 1.47 The volume change potential of the clay soils and the NHBC guidelines, 5.2 building near trees, has not been considered as discussed within paragraphs 1.15, 1.16 and 1.17 of my objection.
- 1.48 Further attention should be given to trees T17 (Sessile Oak – 1120 stem cm dia) and T20 Lime (Lime – est 1400 stem cm dia) within the site. These are probably veteran trees and would require further attention and maintenance to ensure the longevity and survival of these trees. The NPPF states that, "*planning permission should be refused for development resulting in the loss of irreplaceable...aged and veteran trees.*"²³

²³ Paragraph 118, bullet 5, page 28, NPPF

Ecology Impacts

- 1.49 No lighting strategy appears to have been provided by the developer, therefore the effectiveness of the 'bat corridors' is questionable. No cumulative assessment of the proposals in combination with the Copenacre application (N12.008.OUT) in terms of lighting has been undertaken with regards to the mitigation for the Greater and Lesser Horseshoe Bats known to occupy the Corsham mine network.

Heritage Impacts

- 1.50 The historic maps at 1889 and 1923 shows that the site almost certainly formed part of an estate parkland associated with Guyers House, Beechfield House or Middlewick House. This is visible on the ground through the estate parkland trees including trees T18 (Copper Beech – not usually an agricultural field tree), T16 (Lime), T17 (Oak) and TG8 (5 no. Limes – within a circular arrangement). It is therefore not plausible for the developer to argue that *"a negligible impact has been identified on the setting of the conservation area and the listed buildings within it, with the site forming only a minor or less-than-significant element of the setting of these heritage assets."*²⁴ The historic maps show that the land was intrinsic to the setting of these heritage assets.



Figure 12 – the setting of the Roundhouse that marks the settlement gateway into Pickwick would be compromised through extended built form to the north of the A4. Tollhouses were historically at the entrance to a settlement and this perception would be lost as a result of these proposals.

²⁴ Paragraph 4.3, Page 16, CGMS Built Heritage Assessment

- 1.51 The site is located directly between heritage designations including Pickwick Conservation Area and Listed Buildings including 52 Pickwick, the Roundhouse (Figure 12), the Church of St. Patrick, Guyers House and Middlewick House. It is inconceivable that the proposals would have a 'negligible'²⁵ effect on these heritage assets which together surround the site.
- 1.52 The built heritage assessment states that with regards to the Roundhouse, "*possibly a tollhouse in it early life, this small, circular building is Grade II...its special interest largely rises from its architectural appearance, which will remain unaffected by the development of the proposed site.*"²⁶
- 1.53 I disagree with this statement as the Roundhouse acts as the historic settlement gateway for those travelling into Pickwick on the A4 from Rudloe, Box and Bath. The proposals would remove the perception of this settlement gateway leading into Corsham through the advancement of built development to the north of the A4 in combination with the Copenacre planning application. The NPPF is clear on the protection of heritage assets stating, "*significance can be harmed or lost through destruction of the heritage assets or its setting.*"²⁷

Traffic Impacts

- 1.54 The proposals would undoubtedly cause disruption to traffic flows at peak hours on the A4 Bath Road. The proposals include a new site entrances (A and B) with commuters having to cross the traffic to join the A4 in the direction of Bath and the M4 motorway. This will cause interruption to traffic flow. No assessment appears to have been undertaken of the cumulative traffic impacts resulting these proposals with that for the Copenacre application. The combined effects on traffic resulting from these developments would undoubtedly have adverse consequences on traffic flows and congestion which has not been addressed by the developer.

²⁵ Paragraph 4.3, Page 16, CGMS Built Heritage Assessment

²⁶ Paragraph 3.3.18, Page 11, CGMS Built Heritage Assessment

²⁷ Paragraph 132, page 31, NPPF

Summary

- 1.55 On review of the outline planning application (13/05188/OUT) submitted by Gladman Developments Ltd on land to the north of Corsham, I wish to submit an **objection** in principle as a local resident living within close walking distance.
- 1.56 The reasons for my objection are outlined in terms of the housing requirement, principle of development, settlement coalescence and the impacts on landscape and visual amenity, ecology, heritage and traffic. There are a number of issues and concerns outlined within this objection in relation to the housing layout, density and design, and therefore I do not consider the proposals to be deliverable without **major adverse** landscape and visual effects. I request that Wiltshire Council resolves to **refuse** this outline planning application.

Please forward my concerns to the relevant Council officers and feel free to contact me if you have any queries over the matters raised within my objection.

Your Sincerely,

Robert French

(resident of 17 Swan Road, Corsham)

DevelopmentmanagementNorth

From: Christine Burt
Sent: 02 December 2013 15:32
To: Marsh, Chris
Cc: Macrae, Alan; cllr.abosley@corsham.gov.uk; duncan@duncanhames.org.uk
Subject: Objection 13/05188/OUT - Land North of Bath Road Corsham SN13 0QL

Objection 13/05188/OUT - Land North of Bath Road Corsham SN13 0QL

OBJECTION TO THE PLANNING APPLICATION REF 13/05188/OUT

I would like to object to the above application on the following grounds:-

- 1) The subject site falls outside the Corsham Framework Boundary. This site therefore comes within Policy H4 within The North Wiltshire Local Plan 2011.
H4 RESIDENTIAL DEVELOPMENT IN THE OPEN COUNTRYSIDE
New Dwellings in the Countryside outside the Framework Boundaries, as defined on the proposals map, will be permitted provided that:
 - i) It is in connection with the essential needs of agriculture or forestry or other rural based enterprise;
 - ii) It is a replacement for an existing dwelling where:
 - a. The residential use has not been abandoned; and
 - b. the existing dwelling is incapable of retention in its current state, is unsightly or is out of character with its surroundings and
 - c. the replacement dwelling is of a similar size and scale to the existing dwelling within the same curtilage.

The proposed development does NOT comply with any of the above requirements.

- 2) Within the Wiltshire Core Strategy Development Plan, Core Policy 1 Section 4.13 provides that:-
"At the Principal Settlements, Market Towns, Local Service Centres and Large Villages which have settlement boundaries, as defined by former District Local Plans, these will be carried into this strategy and retained. However, these settlement boundaries can be reviewed. It will be the prerogative of the

community to carry out this review through an appropriate planning process which might include a neighbourhood plan.”

Section 4.16 provides that:-

“Any existing settlement boundaries for Small Villages and other small settlements not identified in the settlement strategy will be removed (these are listed in Appendix F), and there is a general presumption against development outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages. However, some very modest development may be appropriate at Small Villages, to respond to local needs and to contribute to the vitality of rural communities. Any development at Small Villages will be carefully managed by Core Policy 2 and the other relevant policies of this plan.”

After extensive public democratic consultation the existing settlement boundary was retained in the Core Strategy Development Plan and the subject site still falls outside the settlement boundary under this policy, as it does under H4 above. The developers should have challenged this at the appropriate time, as part of a public consultation. In summary there is a general presumption against development outside the defined limits of the settlement boundary.

- 3) Within the Wiltshire Core Strategy Development Plan, Core Policy 2 Section 4.24 provides that “In planning for new homes, a number of sources have been identified to ensure a continuous supply of housing across the plan period. These sources of supply are detailed within Appendix C and include:
- strategic allocations made within this plan
 - retained Local Plan allocations
 - existing commitments
 - regeneration projects, for example, those in Chippenham, Trowbridge and Salisbury business expansion plans(22)
 - non-strategic sites identified through community-led planning policy documents, including neighbourhood plans
 - windfall sites in accordance with the delivery strategy.”

This site does not fall within any of these sources, the developers had full opportunity through public consultation to put this site forward when the Wiltshire Core Strategy Development Plan was in discussion, to our knowledge this did not happen.

- 4) Under Core Policy 2 Delivery Strategy it provides that new employment land and homes “will be delivered in a sustainable pattern in a way that prioritises the release of employment land and the re-use of previously developed land to deliver regeneration opportunities, and to limit the need for development on Greenfield sites, with at least 35% of development taking place on previously developed land.” The policy also provides that “within the limits of development, as defined within the proposals maps, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages. Development outside of the limits of development will only be permitted where it has been identified through community-led planning policy documents including neighbourhood plans, or a subsequent development plan document which identifies specific sites for development. This development must be adjacent or well related to the limits of development.”

The subject site is a Greenfield site, is outside the settlement boundary and has not been identified through any other plan or policy document for development, therefore does NOT comply with Core Policy 2.

- 5) Within the Strategy for the Corsham Area Section 5.58 Corsham has not been identified as a location for new strategic employment growth. It also states in 5.59 “transport assessments required for major development should include identifying appropriate solutions to address capacity issues on the A4 and Bradford Road” This development will create substantial extra capacity issues on the A4.
- 6) The applicant has stated in their Planning Statement, Planning Policy Context Section 4.4 that no part of the Development Plan can be given full weight. In Section 4.7 they state that full weight cannot be given to the Core Strategy Plan. They then make great issue about the National Planning Policy Framework in Sections 4.9 to 4.19, without mentioning that the Core Strategy Plan was submitted after the publication of the NPPF and that Wiltshire Council issued a supporting document running to 134 pages confirming that their policy conforms to NPPF. Section 4.20 to 4.30 all relate to legislation prior to the submission of the Core Strategy Development Plan in July 2012 and will therefore have already been taken into account in the policy.

Having established that documents comply with NPPF surely one has to follow the Planning Policy.

This site is outside the settlement boundary and therefore should not be developed.

It is interesting that their Summary places greater emphasis on Government policy rather than planning policy, Section 4.32 "It is clear from the ministerial statements and national planning policy that the Government is committed to substantially increase the amount of housing as a key component in the wider drive towards economic recovery. This message could scarcely be stronger. These factors are an important material consideration which should be carefully balanced during the decision making process."

I do not consider they have made a valid Planning Policy case for granting consent to this application.

- 7) We need to consider in details 5 "The Planning Balance" within the applicants Planning Statement.
 - 5.1 – 5.3, see our comments in 6) above.
 - 5.4 If the Council felt that this site should provide additional land for housing they should have redefined the Corsham settlement boundary.
 - 5.5 As stated above this site falls outside Core Policies 1 and 2.
 - 5.6 All parties to the democratic planning consultation process for the Core Strategy Plan could have identified this site for future development, they did not. The developer could have done so. See 1) above.
 - 5.7 It would seem premature to prepare a neighbourhood plan prior to the Core Strategy Plan being adopted.
 - 5.8 and 5.9 There are other more suitable sites within Corsham to fulfil this requirement.

There are no planning grounds upon which this application should be approved.

8) SUMMARY

This application should not be approved. It does not comply with Planning Policy. I hereby object to the application and request that the Planning Committee refuse consent.

Christine Burt

7 Academy Drive

Pickwick

Corsham

DevelopmentmanagementNorth

From: Marsh, Chris
Sent: 02 December 2013 16:54
To: DevelopmentmanagementNorth
Subject: N/13/05188/OUT - more to log, please
Attachments: Planning Application 13/05188/OUT; Planning Application 13/05188/OUT Land to the north of Bath Road, Corsham; Objection 13/05188/OUT - Land North of Bath Road Corsham SN13 0QL