

Rep ID: Corsham1	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Sport England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
No comment	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Creation of a healthy, inclusive sustainable town. this can be done in part through the use of Sport England and Public Health England' Active Design: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design when designing new housing and in environmental improvements	

CO3. Is this the right pool of potential development sites?

No comment

CO4. What land do you think is the most appropriate upon which to build?

No comment - as long it does not involve land which is used for sport

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

No comment

CO6. Are there any issues or infrastructure requirements that should be identified?

No

Further comments

No

Rep ID: Corsham2	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Turley
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: CORS2a, CORS2b
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
Planning for Corsham / Corsham Site Selection Report As with our comments on the Emerging Spatial Strategy, we welcome the Council's continued recognition of Corsham as a location for growth.	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	

CO3. Is this the right pool of potential development sites?

CO4. What land do you think is the most appropriate upon which to build?

WILTSHIRE LOCAL PLAN REVIEW – REPRESENTATIONS

We write on behalf of our clients to submit representations to the Wiltshire Local Plan Review which is currently subject to public consultation. In particular, these representations relate to an area of land to the north of the A4 at Pickwick, Corsham.

The land promoted by our clients is identified as Site '1' (Pickwick Paddock, Bath Road (SHELAA site 3231)) in the 'Planning for Corsham' document which is published as part of this Local Plan consultation. In addition, this site is subject to an undetermined application (ref: 20/08255/FUL) by Care UK for the construction of an 80 Bedroom Care Home (Use Class C2), with associated access, parking, landscaping and site infrastructure. There has been no objection to the Care UK scheme raised by the Council's Landscape Officer.

That site is identified as Site '1' (Pickwick Paddock, Bath Road (SHELAA site 3231)) in the 'Planning for Corsham' and said to have capacity for around 15 dwellings in the associated Site Selection Report. Whilst our clients maintain their support for Care UK's proposals, the purpose of these representations is to support the principle of the site's allocation.

The land promoted by our clients is identified as Site '1' (Pickwick Paddock, Bath Road (SHELAA site 3231)) in the 'Planning for Corsham' document which is published as part of this Local Plan consultation.

Page 8 of the Planning for Corsham consultation document explains that:

- The site has capacity for a relatively small number of homes.
- Development would need to be carefully designed to be sensitive to its rural setting

Whilst our clients support the indication that this site could be a potential development site, we have the following comments to make based on the Council's Corsham Site Selection Report.

The Council's assessment scores the site 'red' against the Landscape consideration. Although it was completed for the Care UK scheme, the Landscape and Visual Appraisal (LVA) which accompanies that application records:

- That the site is not within a landscape or landscape-related designation.
- The LVA identified that there would be major/moderate effects to the grassland of the site (an inevitability of its development but all other landscape effects would be moderate or less

- The visual enclosure of the site means that landscape effects would be localised, and as a result there would be only minor/negligible effects on the character of the Corsham Rolling Lowlands LCA with no effect on the Cotswold AONB, and only a localised Moderate effect would be experienced by the Pickwick Conservation Area.
- The visual assessment concludes that the proposed development would result in only localised effects upon a few receptors. In our view, the Site Selection Record is overly pessimistic in relation to the landscape impact of the potential development of Site 1. The Site Selection Report concludes that Site 3034 'The Circus' is assessed as 'amber' against the landscape impacts despite the reference to this site being listed as a community Greenspace in the Corsham Neighbourhood Plan. Similarly, site 475 'land adjacent to A4 at Rudloe' is assessed as 'red' despite being identified as part of the Corsham Rural Green Buffer in the Neighbourhood Plan. Site 3655 'land south of Brook Drive' is assessed as 'amber' despite the conclusion that it "is open to potential long-distance views to Bowden Hill to the east although this could be mitigated with suitable planting along the eastern boundary."

For the various reasons set out above, we consider that the landscape impact of Site 1 has been overstated compared to other sites considered at Corsham. Mitigation measures such as landscape planting and the design of the scheme will reduce any impact further. There has been no objection to the Care UK scheme raised by the Council's Landscape Officer.

In the context of the current planning application we understand that the Highways Authority has responded in a positive manner to the scheme, raising no highway safety concerns and concluding that the "principle of development in terms of traffic generation and access would be acceptable".

The Site Assessment Report estimates that this site has capacity for "in the region of 15 dwellings". Our clients consider that the Care UK application and the material which has been submitted in support of those proposals demonstrates that the site has capacity for a greater level of development.

Summary

In summary, we support the outcome of the Council's assessment of this site and the overall conclusion that it could be suitable for development.

We reserve the opportunity to comment on the Local Plan Review in a wider sense as it progresses and further information becomes available.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham3	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Lower. We seen a huge overbuild of new 'executive' style developers' design-and-build homes lately. They have been built with an attitude that is already out of date - i.e. car use is essential, shops and schools are not within walking distance, work is always going to be a commute away, public transport access is limited, there is little provision for single or two person households or for elderly people or disabled people to live independently within the community.</p> <p>And not brownfield. Build within existing communities. Small local towns like Corsham may be able to support a high street of independent shops but larger towns like Trowbridge, Melksham and Chippenham are going to lose their chain shops following the effects of Covid/Amazon. What about building housing there to regenerate town centres?</p>	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

Everything about this form suggests it was written long before the Covid pandemic and is now completely out of date. I can't understand why we would need a second supermarket. Don't suppose you saw the online shopping boom coming. Shouldn't you rethink this now? And protect the independent shops of the town. The free parking in Corsham has been wonderful for bringing shoppers into the town. Keep that up and you may not need to redevelop the Martingate Centre. It could be a magnet for small businesses to grow. Look how well the bike repair shop has done. More of that please!

Also, re the train station. Nice dream but it'll be too expensive. And the train system is wrecked now as a result of the pandemic. There'll not be any money for it.

A decent reasonably priced bus service would be very nice.

CO3. Is this the right pool of potential development sites?

Does Corsham really need any more family housing? Have a look on Right Move, Zoopla etc. There are plenty of these types of houses. Birth rates are falling. Lots of people live on their own - or they'd like to be able to afford to. What about housing for the hairdressers, the shop staff, the delivery drivers, single people, couples, old people, disabled people? Put the housing where there are shops, schools, doctors' surgeries, and transport links. What about building/converting housing for people who aren't part of a family unit? And in the centre of the major towns so they can form a community.

CO4. What land do you think is the most appropriate upon which to build?

Redevelop the major town centres now all the big High Streets are going to be emptying out. Corsham doesn't have the infrastructure to grow and isn't going to for a very long time.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered

generally or in respect of individual sites?

It's the wrong type of housing in the wrong unconnected places for the wrong group of people. You, the Council, have let the developers tell you what they want to build. So much has changed since this plan was launched. You need to step back and have a rethink.

CO6. Are there any issues or infrastructure requirements that should be identified?

We really don't have any transport infrastructure to speak of, do we? Subsidise FareSaver and get them some electric buses or at least help them to buy them. Forget the train station.

Further comments

I think that the pandemic has changed so many things that you need to stop this consultation and start again. Sorry.

Rep ID: Corsham4	
Consultee code: General Public	Consultee Organisation (if applicable): Na
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
No brown field sites need to remain, food chain supply would be affected if we lose these fields	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Improving transport links via train line would be great but it hasn't happened in the 10 years I have been here. Improving shops would be great, difficult after a global pandemic to get small business opening up again	

CO3. Is this the right pool of potential development sites?

Sites 3 and 4 are a definite NO

CO4. What land do you think is the most appropriate upon which to build?

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

A community centre that is open in the evenings and weekends for those people that live alone or work shifts

CO6. Are there any issues or infrastructure requirements that should be identified?

No

Further comments

Rep ID: Corsham5

Consultee code: General Public

Consultee Organisation (if applicable): Property owner

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

Lower - there has been excessive growth in Corsham without increased supply of key facilities such as schools; shops; dentists; doctors etc

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Priority needs to be given on improving community services such as schools; medical care etc

CO3. Is this the right pool of potential development sites?

No there is excessive flooding due to underwater natural springs in this area causing repeated flooding particularly in 2;3 and 4
The Industrial estate means traffic of large trucks and articulated lorries at high speed it is not a safe set

CO4. What land do you think is the most appropriate upon which to build?

There is more than enough new housing in Corsham putting the infrastructure services under pressure

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Yes there are natural springs in the area causing excessive flooding and issues to road surfaces; subsidence issues

CO6. Are there any issues or infrastructure requirements that should be identified?

Not sure

Further comments

Rep ID: Corsham6	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
Brownfield is obviously better (depending on the definition) than greenfield however what type of dwellings are we talking about as 3 bed semidetached houses are probably not what is required. Why have you upped the figure by 40 dwellings if you don't need to? 120 still seems way too many for a small market town.	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
1. yes 2. yes but not to the detriment of existing businesses 3. yes	

4. yes but no to increasing road capacity

5. I think the train stations 'boat' has probably sailed now. Maybe you could consider investing in the local bus network (Faresaver) by helping them update their fleet of buses to electric or hydrogen powered.

6. Why would we need another supermarket, Corsham has fantastic small shops that have managed to keep going despite the Pandemic, another supermarket would kill them off as has been seen in many towns across the county.

CO3. Is this the right pool of potential development sites?

With sites 3, 4 and 5 the Corsham Green Buffer seems to have been completely ignored. I can only presume that their proximity to the industrial estates is the justification for their selection. The fact that Corsham Digital has been built in the centre of the town along with all the local shops doesn't seem to be a consideration for any employment. With this sort of expansion into green countryside it wont be too long before Neston and the Gastard are all part of a bloated Corsham.

CO4. What land do you think is the most appropriate upon which to build?

Is Corsham the right place to expand further. There are already large estates in constrution and another planned on the other side of the A4.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Yes, once you've built on a green field that's it gone for ever. I don't think that digging up and then covering in concrete a perfectly serviceable field is very good for the environment. So is all this additional house building strictly necessary for a small market town! There isn't the transport infrastructure, the schools are pretty full and I'm pretty sure there aren't hundreds of job vacancies at the industrial estates for all occupants of these new dwelling?

CO6. Are there any issues or infrastructure requirements that should be identified?

Why does Corsham need to grow? please refer to my previous answer. I think Corsham is doing fairly well on the above items just public transport is a bit lacking but hats of to Faresaver who have kept going throughout the Pandemic.

Further comments

I really do believe that due to the Pandemic the working and living requirement of people have changed. I feel that when the virus is under control the local plans should be reviewed as I am not sure that what you think might be needed in 10 years is now necessarily the case.

Rep ID: Corsham8

Consultee code: General Public

Consultee Organisation (if applicable): Self

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

No. Brownfield sites should derive from brown fields not green fields. Somewhere that has had previous industrial buildings on. Not turn green fields over to brown sites.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

yes

CO3. Is this the right pool of potential development sites?

no. You are not maintaining separate entities of Corsham, Rudloe and Neston. These sites merge them further together.

CO4. What land do you think is the most appropriate upon which to build?

MOD site at Rudloe. Run down. Brownfield already.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Level of flooding in these areas after heavy rain. Local infrastructure does not support increase. Doctors and primary schools are already at full capacity

CO6. Are there any issues or infrastructure requirements that should be identified?

yes impact on doctors, schools

Further comments

no

Rep ID: Corsham9	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
If increasing the target by 40 encroaches on existing working farming land then the target should be left at 120, the aim should be to not use farming land that is being actively farmed.	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
The priorities appear to good but where would a new supermarket be built and what about Doctor's Surgery capabilities, these are already stretched.	

CO3. Is this the right pool of potential development sites?

Site 4 contains farming land that is constantly farmed for crops and silage and is part of a working farm environment. It also supports a wide range of wildlife including monk jack deer, roe deer, foxes, badgers, squirrels, buzzards and pheasants as well as a wide range of wild birds.

Site 3 also contains a large proportion of constantly farmed land and should not be used although there is a plot behind the Dicketts Road flats that could be used.

CO4. What land do you think is the most appropriate upon which to build?

Sites 1, 2, 5 and 6 and the plot of land in site 3 that is behind the Dicketts Road flats which is not currently farmed (I believe). The Doctor's surgery could be extended to encompass the unused and wasted former clinic. I have no idea where a new supermarket could go!

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

As stated, Sites 3 and 4 are working farmland and should be left untouched as well as site 4's wildlife support.

CO6. Are there any issues or infrastructure requirements that should be identified?

Doctor's surgery capability, is the current surgery big enough to cope with the increase as it is already struggling with long waiting times to get an appointment? There is room for development of the existing surgery and former clinic site.

Further comments

Rep ID: Corsham10

Consultee code: General Public

Consultee Organisation (if applicable): N/A

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

Growth is too rapid. Corsham already turning into a concrete jungle. The towns infrastructure is struggling to cope with rapid rise in housing already and planned growth will cause even greater stresses.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO3. Is this the right pool of potential development sites?

No.

CO4. What land do you think is the most appropriate upon which to build?

Corsham already built up too much. Corsham/Neston already feeling like it's merging and any further development these areas would amplify that.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

We are constantly losing green land around the area. We need to prioritise land already built on. Ex MOD sites for example.

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Let's use common sense. Don't ruin this beautiful town. The infrastructure of the town is close to breaking point and further expansion will only lead to the desegregation of Corsham and its surrounding villages.

Rep ID: Corsham11	
Consultee code: General Public	Consultee Organisation (if applicable): n/a
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
I believe that the requirement for homes is too high, and that the type of housing supposedly needed is reviewed.	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
I agree with points 1, 2 and 3. 4. Whilst currently the congestion around the A4 junctions is high at peak times, surely the Council's long term aims are to reduce the number of vehicles? We should focus on that aspect rather than allowing additional vehicles. 5. I do not have sufficient knowledge at this stage to comment on the viability of a train station.	

6. I completely disagree with the development of a further supermarket. Shopping locally means supporting local and independent shops, not furthering the profits of giant supermarket chains. If there is regeneration of the Martingate Centre, I see Corsham as a 'Destination' Market Town where shoppers can benefit from more social and ethical choices that true local shops can offer. Perhaps the answer is for extended car parking facilities to enable consumers to park up and enjoy a shopping experience?

CO3. Is this the right pool of potential development sites?

Our country is fixated on owning a 'house'. In your Consultation an affordability value of £192,500 has been identified for the mean 2 bedroomed house price. How many houses are available at that price in the Corsham area? House prices are likely to inflate further given this week's budget announcement of mortgage incentives (4th March 2021) and what we need is low cost housing. We should ensure that there is a genuine need, rather than a desire to meet a historic target, and where that need is identified, I believe that apartments/flats are entirely suitable for many people, particularly first time buyers - low cost housing to enable them to get on the housing ladder. In developing this type of housing, it should be compatible with the latest and highest standards in carbon reduction. New accommodation must of course be supported by the necessary health and education infrastructure to incorporate any rise population in those areas.

CO4. What land do you think is the most appropriate upon which to build?

As per my answer to no. 9 CO3, we should be utilising existing buildings and Brownfield sites to redevelop instead of encroaching on our ever diminishing agricultural land and Greenfield sites. Brexit has made it even more imperative that we preserve and encourage sustainable farming in our area for our futures. There are only three vital requirements for life, food, water and shelter. We must reach a balance, and the UK must become more self sufficient in the production of food.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

We should be working harder to achieve greater carbon reduction, greater sustainability.
All planning developments must, in advance, include climate change impact assessments in accordance with the Council's carbon reduction targets.
I see nothing in regard to the provision of alternative and renewable energy production. I expected to see within the plan, the inclusion of onshore wind generation (the lowest cost form of electricity).
I see nothing about enhancing walking and cycling infrastructure - this must be included as well.

CO6. Are there any issues or infrastructure requirements that should be identified?

As in the previous question, the Council should include plans to safeguard our future food sources.
Opportunities for renewable energy generation need to be identified and implemented.

Further comments

I have a strong suspicion that this Consultation will have few responses as a percentage of the local population. I believe that thought needs to be given on how to make this collection of documents and the questionnaire more better advertised. I am glad to have the opportunity to make my views known.

Rep ID: Corsham12	
Consultee code: General Public	Consultee Organisation (if applicable): N/a
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
Brownfield sites only	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
More funding for the town, where would new supermarket go? How would this impact on already struggling local shops, eg, grocer's butchers etc. Protect the green infrastructure	

CO3. Is this the right pool of potential development sites?

Very disappointed that pickwick paddock is up for development, when there is alot of wildlife in this area.

CO4. What land do you think is the most appropriate upon which to build?

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

The impact on schools, surgery's, local transport. Also the importance of protecting wildlife

CO6. Are there any issues or infrastructure requirements that should be identified?

Impact on wildlife

Further comments

Rep ID: Corsham13

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

The scale of growth seems ok if it can be accommodated on brownfield sites within the town

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO3. Is this the right pool of potential development sites?

No. Sites 2, 3 and 4 should be excluded as they are not well connected to the town.

CO4. What land do you think is the most appropriate upon which to build?

Brownfield land within the town or sites which are level walking distance to the town for example north of the A4 or along Lacock Road.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

There should be a new railway station.

Further comments

Rep ID: Corsham14

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

The figure seems reasonable.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO3. Is this the right pool of potential development sites?

Sites 2,3 and 4 should not be built on. Sites should be found within the town or be better related to the town centre.

CO4. What land do you think is the most appropriate upon which to build?

Sites should be found within the town or be well related to the town centre.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham15	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>I understand that new homes are required but Corsham itself has seen massive development over the last 15 years and as a result has changed it beyond measure. The Katherine Park estate is huge compared to the previous size of Corsham and has only been added to with all the new estates that have been built around Corsham since then. I find it somewhat surprising that Corsham is earmarked for any further housing. If there is to be further development then it should only be on brownfield sites. I do not understand why the Council is suggesting a target of 160 homes when the number required is in fact 120.</p>	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
I agree with the above priorities.	

I would also add regeneration/revitalisation of Corsham Market on Tuesday mornings, which provides locally produced products, which a second supermarket would not. The latter is not favoured by everyone but as the existing Co-op is actually quite expensive this means that many people do their weekly shop by car at the Sainsbury's in Chippenham.

Also, new build developments should be required to include additional facilities or monies towards increasing capacity of existing facilities for all the new people that move to the town. Eg increasing GP surgery capacity, additional small corner shops, community hubs, etc. The only option for those in the newer builds is to jump in the car even if they want to buy a single loaf of bread. House building should be discouraged where this creates car dependency.

I would disagree with the implication that addressing climate change cannot be distinct to a particular place. It should be incorporated into every aspect of future local priorities otherwise we have no hope of achieving a zero carbon County by 2030. For example, fitting solar panels to the roof of the Co-op in the Martingate Centre would have a big cost benefit in terms of energy savings and reducing carbon emissions. The general regeneration of the Martingate Centre is a key priority, businesses have been put off by leaky roofs in its shops and as a result there are always empty units. An energy grant to refurbish the units would hopefully mean a nicer shopping experience, less energy wastage and filled units.

With transport the emphasis should be on encouraging people to use public and active transport, to avoid car use, and where this is not possible to encourage electric car use. However, this needs to be done at all levels so it should form part of planning for new homes as well as be something that the Council actively promotes whether by giving incentives to electric car clubs or car sharing schemes for individuals and companies, or by improving walking and cycling infrastructure. The constant reason that people give for not cycling is that they (including me) perceive it to be dangerous because of other road users. Cycling courses to cover all aspects of bike maintenance, as well as giving people confidence to cycle on the roads would be key. Public transport also needs to be overhauled. Bus prices need to be much cheaper, buses more frequent and routes extended. At the moment, there are good bus links to Bath and Chippenham but if you want to travel by public transport elsewhere locally bus links are pretty poor and even travelling a short distance sometimes necessitates a car journey because of poor bus connections. Opening the train station in Corsham would also have a massive impact on car use and cut emissions.

CO3. Is this the right pool of potential development sites?

No.

Site 5 The Circus - this is a very popular community green space, which I personally use every day, and which is enjoyed by many dog walkers, runners, etc. There would be uproar if it was sacrificed to housing. This site also has quite a few old MOD concrete underground structures, I am not sure therefore what lies underneath the site!

I would also be against those sites that form part of the Corsham Rural Green Buffer.

CO4. What land do you think is the most appropriate upon which to build?

In order, sites 4 (outside the Green Buffer), 2, 6, 1

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Site 5 The Circus is an important community space which is already surrounded on 2 sides by developments in the last 15 years. It is used daily by residents of the Katherine Park and Park Place Estates. For many of these residents it is their nearest decent green space as the developers left Katherine Park Field (off Freestone Way) so waterlogged that you cannot walk across the grass areas, except on very dry days, as the drainage there is terrible. Whereas the Circus is used all year round. An important planning aspect might be to insist that developers in future ensure proper drainage of recreation areas.

Sites 1 and 6 could add to congestion on the already congested A4.

Sites 2, 3 and 4 do not have great access to public transport.

CO6. Are there any issues or infrastructure requirements that should be identified?

Cycling - there is a great enthusiasm for cycling in the town but cycleways are disjointed and some roads in very poor condition for cyclists eg Pockeridge Drive. Cycling on the roads is also viewed by many (including me) as dangerous so cycling courses aimed at building confidence on the roads would be beneficial.

20 mph speed limit - to cut carbon emissions and to make Corsham town centre safer for pedestrians and cyclists

Facilities provided within developments - developers could be obliged to provide other facilities within these developments eg community hubs or corner shops to give them their own sense of identity and community.

Access to green spaces and wildlife (biodiversity) within developments - developers could be obliged to provide green community areas with seating, having saved existing pockets of trees and wildlife. A few newly planted trees on poorly drained grassy areas is not sufficient.

Further comments

Combating climate change should be at the heart of all decisions taken that will affect Corsham in the coming years. Development, if not managed carefully, will increase carbon emissions in Corsham and action needs to be taken immediately to ensure that this does not happen. Any development in Corsham should be sustainable, zero carbon and should not increase dependency on private cars therefore there needs to be investment in public and active transport.

Rep ID: Corsham16	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
I find the present level of growth in Corsham to be excessive for the lack of improved infrastructure. I am dubious that the Council will only allow an extra 120 houses to be built in Corsham in the next 10 years, going by previous experience. I do not understand why there is a separate brownfield site target.	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Yes, I agree with the above priorities. Road network capacity - increasing capacity does not necessarily decrease congestion. People need to be encouraged to use greener transport methods ie public and active transport, to decrease car use and carbon emissions. Ideas could include electric	

car clubs, car sharing schemes and improved walking and cycling infrastructure. I hope that bus links at least go back to pre-Covid levels but bus transport generally needs to be cheaper and routes need to be extended. Opening Corsham train station would also cut car use and encourage tourists and job opportunities to the area.

Second supermarket - at the moment Corsham has one quite expensive supermarket, so most of the Corsham pound goes to Chippenham which has a large range of supermarkets. The High Street itself does not have enough local shops to cover everything that a person would need to buy each week.

New developments could include additional facilities like small shops and community hubs as well as decent green space.

CO3. Is this the right pool of potential development sites?

No. Site 5 The Circus is a well used local amenity, used by dog walkers, joggers and walkers.

CO4. What land do you think is the most appropriate upon which to build?

Sites 1, 2, 4, 6

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Site 5 is a well used local amenity, used by dog walkers, joggers and walkers.

Sites 2, 3 and 4 would increase town traffic as residents would have to drive through town to get to the A4 as there is a lack of public transport in these areas.

CO6. Are there any issues or infrastructure requirements that should be identified?

I am a bit worried about if public transport will go back to pre-Covid levels. To get people out of their cars, buses need to be cheap and frequent. Car shares and electric car clubs are other options. Active transport infrastructure needs to be improved and cycling made safer so that adults and children feel safe or have their own cycle lane.
A 20 mph speed limit imposed in town would also help to cut carbon emissions, improve air quality and make Corsham town centre safer for pedestrians and cyclists
Developers could provide community hubs or small shops within their design.
Developers could also provide decent green spaces with seating and keep patches of woodland to combat climate change and improve biodiversity.
Waste services will also increase with the influx of more people so the Council needs to work harder to encourage residents to recycle more.

Further comments

Combating climate change is the number one priority that should be considered when assessing the impact of future development in Corsham. It is vitally important that all development is zero carbon and that hard policies are put in place to ensure that this happens. No more greenfield sites should be built on and everyone should be actively encouraged to ditch the car and use public and active transport. This is the our last chance to tackle climate change and Corsham residents want to do their bit to help the planet!

Rep ID: Corsham17

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

Lower

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Yes

CO3. Is this the right pool of potential development sites?

With site 4 Neston will lose it's separate identity

CO4. What land do you think is the most appropriate upon which to build?

2. 5 and 6

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

With site 4 although not protected the habitat here contains many deer ,badgers,foxes and the water course here must surely contain numerous aquatic creatures

CO6. Are there any issues or infrastructure requirements that should be identified?

Lack of doctors surgeries and supermarkets

Further comments

Rep ID: Corsham18	
Consultee code: General Public	Consultee Organisation (if applicable): n/a - private individual
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>The reasoning for this number of new homes is unclear. Nor has any mention been made of the type of dwelling. I note that Wiltshire proposes to build more houses than the government guidance. There is no mention of the within the Corsham document. Corsham seems extremely well provisioned with high value houses. There is no mention of any social housing. Given the carbon neutral targets, there should be an absolute ban on any Greenfield construction. There should also be strict guidance on the type of housing to be developed and the facilities required in each estate.</p>	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
The following priorities are missing:	

- the provision of adequate local transport. New housing developments are not served by public transport yet the climate change document highlights the current climate impact of transport in Wiltshire. Even the bus journey from Box to Corsham is off putting because there is no direct route service: it goes round all the local estates
- local shopping. Corsham is well served by a supermarket. However, local estates still generate car journeys because there are no shops in estates. In addition, the impact of a second supermarket on Corsham's local independent retail environment is not discussed
- the A4 congestion is usually caused by longer distance journeys and there does not seem to be an overall plan to try and reduce these
- are the A4 improvements best use of resources given the desire to focus on travel emissions stated in the climate and biodiversity review

CO3. Is this the right pool of potential development sites?

No comment apart from the fact that the map does not scale well online

CO4. What land do you think is the most appropriate upon which to build?

Brownfield only and at a suitable distance from potential flood areas.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Provision of local transport, corner shops and healthcare

CO6. Are there any issues or infrastructure requirements that should be identified?

- there is no mention of social housing
- there is no mention of a planning requirement for zero carbon building
- Corsham is not well served by fast buses. The X31 serves all settlements leading to numerous off main road diversions. There is a strong case for an additional express bus service serving Chippenham, Corsham, key villages on the A4 and Bath. This should be timed to link with rail services at Chippenham and Bath and should allow for early morning and evening commuting
- there is no mention of creating a suitable pedestrian and cycling infrastructure
- In a drive to reduce car usage the introduction of a car club service should be considered
- there is no mention of suitable infrastructure for electric vehicles
- there is no mention of the impact of a higher population on rural areas and footpaths and how these will be maintained and protected
- there is no mention of how to increase local jobs to reduce travel and congestion
- there is no mention of providing hot design facilities to encourage remote working and local businesses to reduce transport
- it is unclear how the climate change and biodiversity plan fits into this plan

Further comments

The scale of reports and potential answers is off-putting. Local residents should be directed to individual landing page, not one central page

Rep ID: Corsham19

Consultee code: Statutory Body

Consultee Organisation (if applicable): Wessex Water

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

Where developing on brownfield sites opportunities must be realised to redirect surface water from the foul water networks and limit the surface water flows from site using multi benefit SuDS schemes.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO3. Is this the right pool of potential development sites?

Site 1: Pickwick Paddock, Bath Road (SHELAA site 3231)

A moderate amount of development can be accommodated in existing local networks without additional improvements. There is an existing public sewer crossing the site which will require suitable easements. Surface water to be discharged in accordance with local and national policy. There must be no surface water connections to the foul sewer network.

Site 2: Land South of Brook Drive (SHELAA site 3655)

A moderate amount of development can be accommodated in existing local networks without additional improvements. Surface water to be discharged in accordance with local and national policy. There must be no surface water connections to the foul sewer network.

Site 3: Land east of Lypiatt Road and west of B3353 (SHELAA site 3654)

A moderate amount of development can be accommodated in existing local networks without additional improvements. There is an existing public water main crossing the site which will require suitable easements. Wessex Water are proposing a new sewer scheme to replace a strategic sewer currently running close to the railway track. A new pumping station is required in the area of the Site 3. Masterplanning must reserve a location for the pumping station. If required the pumping station may be sized to accommodate more than moderate development at this location. Surface water to be discharged in accordance with local and national policy. There must be no surface water connections to the foul sewer network. There has been multi agency investigations into the cause of flooding downstream at Southerwicks and Station Road. If surface water from this development is to connect upstream to the Southerwicks / Station Road surface water network appraisal must assess impact and mitigation measures.

Site 4: Land east of Leafield Trading Estate and west of Lypiatt Road (SHELAA site 3653)

A moderate amount of development can be accommodated in existing local networks without additional improvements. There is an existing public water main crossing the site which will require suitable easements. Wessex Water are proposing a new sewer scheme to replace a strategic sewer currently running close to the railway track. The new sewer may run close to this area 4. Suitable easements to be observed. Surface water to be discharged in accordance with local and national policy. There must be no surface water connections to the foul sewer network. There has been multi agency investigations into the cause of flooding downstream at Southerwicks and Station Road. If surface water from this development is to connect upstream to the Southerwicks / Station Road surface water network appraisal must assess impact and mitigation measures.

Site 5: The Circus (SHELAA site 3034)

A moderate amount of development can be accommodated in existing local networks without additional improvements. Foul sewers serving the existing MOD development are not fully chartered. Further investigation will be required to determine the ownership and condition of these sewers. If not available for connection by new development a longer more difficult connection

off the site will be required. On site easements and diversions may be required. Surface water to be discharged in accordance with local and national policy. There must be no surface water connections to the foul sewer network.

Site 6: Land to the north of 16 Bradford Road (SHELAA site 3250)

A moderate amount of development can be accommodated in existing local networks without additional improvements. There are existing public and private water mains crossing the site which will require suitable easements. Surface water to be discharged in accordance with local and national policy. There must be no surface water connections to the foul sewer network.

CO4. What land do you think is the most appropriate upon which to build?

Please see response above under CO3

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Please see response above under CO3

CO6. Are there any issues or infrastructure requirements that should be identified?

- there is no mention of social housing
- there is no mention of a planning requirement for zero carbon building
- Corsham is not well served by fast buses. The X31 serves all settlements leading to numerous off main road diversions. There is a strong case for an additional express bus service serving Chippenham, Corsham, key villages on the A4 and Bath. This should be timed to link with rail services at Chippenham and Bath and should allow for early morning and evening commuting
- there is no mention of creating a suitable pedestrian and cycling infrastructure
- In a drive to reduce car usage the introduction of a car club service should be considered

- there is no mention of suitable infrastructure for electric vehicles
- there is no mention of the impact of a higher population on rural areas and footpaths and how these will be maintained and protected
- there is no mention of how to increase local jobs to reduce travel and congestion
- there is no mention of providing hot design facilities to encourage remote working and local businesses to reduce transport
- it is unclear how the climate change and biodiversity plan fits into this plan

Further comments

Rep ID: Corsham20

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

Lower. Yes.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

The road network does not require additional capacity.
There needs to be a shift away from private cars to public and active transport, investment in cycling and walking infrastructure and improving infrastructure for electric vehicles.
Corsham does not need a train station, the local station in Chippenham is sufficient.

CO3. Is this the right pool of potential development sites?

Yes

CO4. What land do you think is the most appropriate upon which to build?

Brownfield

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Avoid building houses that create car dependency

CO6. Are there any issues or infrastructure requirements that should be identified?

All planning policies should include climate change impact assessment, set against the Council's carbon reduction targets.

Further comments

It is hard to see how these plans fit with Wiltshire Council's obligations for reducing carbon emissions.

Rep ID: Corsham21

Consultee code: General Public

Consultee Organisation (if applicable): Corsham resident

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

It should always be a priority to develop commercial or residential brownfield sites rather than countryside land

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

I don't believe the second supermarket is a priority considering the amount of small local shops and businesses that supplement the supermarket. with Sainsbury's, Aldi and a Marks and Spencer's Close by this is sufficient to meet Corsham's needs.

CO3. Is this the right pool of potential development sites?

No, site 4 should not be in the pool for a number of reasons. The elevation of the land would mean that the houses would be far too prominent and out of keeping with the surrounding properties and dominate the landscape. The risk of flooding would be greatly increased due to the hard standing from such a development of housing as identified by available flood data. This would impact the surrounding properties in Potley Lane, Tellcroft Close and businesses in Leafield Industrial Estate. In conjunction to the flooding would be the risk of contaminates from the fields and the health and safety issues they pose. This would have severe detrimental impact on the wildlife such as the deer, muntjac, owls, pheasants, bats, badgers and all the other abundant wildlife.

CO4. What land do you think is the most appropriate upon which to build?

Site 2 (3655) would seem the most appropriate due to the location by two main roads for access, transport links without the need for further creation of additional infrastructure networks. The land would not be encroaching other local villages and there would still be a green buffer.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Please see the environmental factors in question CO3. It is concerning that we have a shortage of health care already in Corsham without increasing the population further.

CO6. Are there any issues or infrastructure requirements that should be identified?

The list above seems comprehensive and I have nothing further to add.

Further comments

Whilst the need for housing will always be there, great care needs to be taken with respect to the environmental impacts and the negative consequences if ignored.

Rep ID: Corsham22

Consultee code: Other

Consultee Organisation (if applicable): Pickwick Association

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

From a strategic point of view we have grave doubts as to the basis on which the so-called 'need' for additional housing in Wiltshire as a whole, let alone in Corsham, is based. It appears to be a central government objective merely split amongst local authorities using a formula of which we are not aware. Wiltshire housing 'needs' appears to originate from a device referred to as 'Government's Standard Method' which, according to the Emerging Spatial Plan is itself 'up for review'. The system does not seem to be sensible to us. The calculations which generate the 'scale' of growth are entirely theoretical, yet Wiltshire (as with other Authorities) is asked to convert this dubious theory into planning consents for bricks and mortar. So we believe that the scale of growth postulated in the papers is highly suspect. As regards brownfield, our position is that all development should be on brownfield sites, even though developers far prefer the easier exercise of building on greenfield where costs are lower and profits greater.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

We concur with these priorities.

CO3. Is this the right pool of potential development sites?

General

Our position is that Wiltshire almost certainly doesn't 'need' the number of additional houses it's tasked to provide, and that concentrating them within the existing main settlements is suspect.

Wiltshire desires to focus on the three principal settlements of Chippenham, Salisbury and Trowbridge to largely fulfil its housing quota. It justifies this on the basis that this would facilitate carbon reduction – the theory goes that developments in existing urban centres makes best use of existing infrastructure and therefore minimises the generation of carbon. This is entirely misplaced since concentration on areas whose infrastructure is already overburdened will simply lead to widespread public demand for improved infrastructure. And in most cases, there will be significant local constraints. Such constraints are only likely to be overcome by expensive and the carbon-generating projects the whole thing was supposed to prevent.

Far better, we suspect, would be a plan for an entirely new settlement located with easy access to the county's principal motorway links in which all facilities including housing, infrastructure and employment could be provided at the very start. In effect a 'new town'.

That said, we accept that for Corsham we are where we are and are the present exercise binds us to comment on the format of the questions we are asked.

At the outset, the justification for any development in Corsham is weak. The Emerging Local Strategy document defines Corsham as a market town. That same document notes that:-

'Market towns have the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities and promote self-containments and sustainable communities.'

At the same time 'Planning Corsham' notes that:

'On current evidence, further employment land is not needed at Corsham. Land is already allocated in both Local and Neighbourhood Plans. Employment land supply has been reviewed and the existing supply is available and capable of meeting the needs.'

Between them these documents suggest that Corsham has no requirement to employ any potential it may have for development to increase jobs; neither does it need homes to house any additional numbers of workers – because there is simply no demand for either.

The review makes it clear that no additional employment land is required. Paired with the propensity generated by the pandemic and 'working from home' it would appear that all additional housing proposed will be occupied by commuters, retirees or those who work for home.

That said, we are asked to consider whether the suggested six sites are the 'right pool' or whether other sites should be considered. In the following section we will attempt to answer questions CO3,4 and 5 together.

Our response is predicated on the basis that Corsham's northern settlement boundary (that is to say the A4) should continue to be respected in order to retain the rural setting of the town and that development should be concentrated on those areas with the best existing or planned local services and infrastructure links.

The commuting population can be expected to travel from their new residences to their place of work in Corsham or the local towns or onwards to Bath, Swindon or Bristol by road or by rail. So not only should site availability be considered, but also access to commuting links when determining site selection.

As regards Site 1, Pickwick Paddock

This quaintly named site concerned is particularly sensitive. That section nearest the A4 is within the Pickwick Conservation Area for the which the Association, with the support of Wiltshire Council, is in the final stages of drafting an Appraisal. Within this emerging Appraisal, the site is described, inter alia, as follows:-

The only view directly to open farmland from the A4 from the Conservation Area is that from opposite Number 2 Pickwick. As such this open space remains important to the integrity of the Conservation Area since it contributes to the area's character by reinforcing its historic open setting.

And in the Annex on management it states:-

Open views

In its setting, the Pickwick Conservation Area, having been hemmed in by urban development to the south, only has access outwards to open countryside views from Beechfield to the west and from opposite No. 2 Pickwick to the north. We are conscious that approved development west of Beechfield is presently required to allow for a buffer zone of at least 25m. It is important that, should this development take place, mitigation planting agreed should be strictly monitored.

We recommend that any new development permitted within the arc of viewing from either location should seek not to detract from these views.

Over the past 30 years, infill development to the south of the A4 in Pickwick has inextricably linked the former separate village of Pickwick to the town of Corsham. At the same time there has been a general moratorium on development north of the A4 through the historic section of the village save on brownfield sites or on a unit for unit replacement basis – for example at Woodlands and Beechfield. Exceptions to this rule – for example at ‘Fieldhouse’ – have been small developments which have not impinged on the setting of the Conservation Area.

As a point of principle, any development on the single remaining part of Pickwick which retains some vestige of the former village’s historic open setting should be resisted.

Hence, we oppose any development on this site.

As regards Site 2, 3 and 4 Land South of Brook Drive etc

The development of one or other of these sites would appear to be leading candidates for selection> they are near the site of the proposed new Corsham railway station and have existing or improved new commuter links to both the town centre and to employment opportunities beyond.

As regards Site 5 – the Circus

As to Peel Circus, this is already a well-used recreational spot and it’s development would adversely impact on residents of the immediately opposite (and still expanding) new housing development. We are aware that the MoD has its eyes on this site for potential support housing and would not object to limited such development alongside its immediately adjacent housing complex. We acknowledge that the MoD housing at this location - built pre-war - is entirely in the local vernacular so matching development types will be necessary.

As regards Site 6 - Land to the north of 16 Bradford Road

We oppose development on this site since it is on land already licensed for mineral extraction.

Other possible development sites

The residual part of the ex-RN site at Copenacre, has not been developed as was originally intended as a Care Home.

Consideration could be given to utilising it for housing but only if demand does not exist for a Care Home.

The Kings Avenue area to the East of Pickwick has the opportunity for significant “infill” development.

CO4. What land do you think is the most appropriate upon which to build?

The consultation documents state that no additional employment land needs to be identified in Corsham. We have suggested that there may be little need for any additional housing in Corsham.

Should any additional development land prove to be needed in future, priority for development should be awarded to brown field sites.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Not that we aware of.

CO6. Are there any issues or infrastructure requirements that should be identified?

Corsham suffers from the heavy use of the A4 north of the town for through traffic from the A350, for commuter traffic to/from Bath/Chippenham and the M4.

Consideration should be given to directing through traffic via the A420 in order to protect the historic Conservation Area of Pickwick from damage by an inappropriate volume of traffic.

Further comments

- 1 Corsham has a history of flooding originating from the north-west of the town and flowing towards the south-east. It is important to ensure that all development proposals adequately deal with potential flooding issues.
- 2 Corsham is the source of valuable mineral deposits. Any development proposals which potentially impinge on their extraction should be refused.
- 3 With an ever-increasing volume of through traffic on the A4 there is a growing need for some form of traffic calming through Pickwick That has always been a prime concern of local residents.

Rep ID: Corsham23	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Corsham Town Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>The figure of 120 dwellings for the plan period is felt to be acceptable considering the high level of development Corsham has seen in recent years often without appropriate improvements in infrastructure. This has led to increased pressure on existing infrastructure such as doctors, dentists and schools.</p> <p>The brownfield target of 160 dwellings is too high. This target is even higher than that for the settlement. There are no identified brownfield sites in Corsham. Therefore, the number should be reduced significantly. The suggestion that the review of the Neighbourhood Plan could address the brownfield target is unrealistic. The target should be much lower as it was based on the redevelopment of the former MOD site at Copenacre.</p>	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

The priorities should be amended to read as follows:

- Maintain the separate identities of Corsham from the settlements around the town (Rudloe, Westwells, Gastard and Neston)
- Regeneration and /revitalisation of Corsham Town Centre, in particular the Martingate Centre
- Protect, improve and extend the Green Infrastructure network and important habitats for bats
- Improve transport infrastructure in and around Corsham and improve road network capacity (particularly to address congestion at junctions along the A4)
- Safeguard land for a new railway station and associated infrastructure and work proactively towards the aim of a new station
- Provision of a second supermarket for the town to provide the opportunity for people to shop locally
- Ensure sufficient Healthcare provision is available in the town
- Conserve and enhance the distinctive characteristics of the historic landscape, centre and heritage rich areas including underground
- Facilitate the provision of safe pedestrian and cycle routes and improve connections within and to the town and surrounding area
- New allotment sites are required due to high demand (there are almost 100 people on Corsham Town Council's allotment waiting list).

CO3. Is this the right pool of potential development sites?

Other sites which should be included are:

- i) The element of Copenacre due to be developed by Wiltshire Council.
- ii) The site which is excluded from the settlement boundary but surrounded by the new development Potley Rise should also be included and assessed.

CO4. What land do you think is the most appropriate upon which to build?

The Town Council agreed with the decision not to take forward sites 475, 1101, 2080, 3035 and 3149.

The Town Council felt that site 3034 (site 5) could be suitable for small-scale partial development (20 - 30 dwellings, aimed at meeting MOD employees' needs) if the area used was adjacent to Katherine Park and the remainder of the site was used as community green space to be managed locally.

Site 3231 (site 1) should be excluded due to a lack of need, drainage, highways and other concerns.

Site 3250 (Site 6) should be excluded due to mining activity beneath the site.

The part of Site 3653 (site 4) outside the green buffer should be taken forward for further assessment subject to confirmation by the local lead flood authority that any development would not increase the risk of flooding elsewhere. It was felt that the site must be subject to a master planning exercise to ensure that any development would not detrimentally affect plans for a new railway station. The masterplan may cover, for example, car parking, retail and the provision of a hotel. Access would need to be carefully considered.

The part of Site 3654 (site 3) outside the green buffer should be taken forward for further assessment subject to confirmation by the local lead flood authority that any development would not increase the risk of flooding elsewhere. Access would need to be carefully considered.

Site 3655 (Site 2) should be excluded as development of this site would be visually detrimental to the area.

The type and form of development should be guided by identified local need, the Housing objectives in the Corsham Neighbourhood Plan and the Corsham Design Guide.

The sites at Copenacre and Potley Lane should be developed first. Sites 4, 5 and 3 could then be considered for further detailed assessment to fulfil the remainder of the identified need.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Mining is important to the town economically and this places a significant constraint on future housing development. We would not want housing development to detrimentally affect the ability of the mining industry to successfully continue.

The green buffer is vital to the health of the bat SAC and is needed to protect the internationally important habitat for rare bat species.

CO6. Are there any issues or infrastructure requirements that should be identified?

There is a significant number of areas of road infrastructure where investment is needed to improve safety for cyclists and pedestrians.

Capacity issues have been identified by the CCG at Corsham and Box Surgery. We suggest that the Local Plan seeks to establish the need and possible solutions.

Further comments

Rep ID: Corsham24

Consultee code: General Public

Consultee Organisation (if applicable): RESIDENT

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

Yes there should be a brownfield target and greenfield land should not be utilized to meet the shortage of homes projected.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

These priorities seem very reasonable, especially the need to protect and improve the Green Infrastructure network.

CO3. Is this the right pool of potential development sites?

The question is confusing. The paragraph above states that there are four potential development sites but then lists six sites?

CO4. What land do you think is the most appropriate upon which to build?

I believe site 2 and site 5 are the most appropriate for developing and would have the least effect on dwellings in the vicinity.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

I can't speak on other sites but I know sites 3653 has a diverse range of wildlife including Roe deer, Muntjac deer, Foxes, Raptors etc. There is a very active badger set in the copse just NW of Great Lypiatt Farm and Great Crested newts were known to be present in the pool just NW of Great Lypiatt Farm. (They are probably still there). A badger sett is also present on the NW border of this site. I personally believe we should not be destroying greenfield sites with the subsequent adverse effects on the inhabiting wildlife. Development on site 3653 would be extremely harmful to both the wildlife and landscape. There are also numerous springs on this site clearly evidenced in the drive of No 15 Tellcroft Close and in the middle of the road outside the No 23 Tellcroft Close.

CO6. Are there any issues or infrastructure requirements that should be identified?

None spring to mind.

Further comments

Rep ID: Corsham25

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

It seems reasonable but must come with improvements to existing infrastructure

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Allotments should also be added to the list of priorities

CO3. Is this the right pool of potential development sites?

No. This is not the right pool of sites. Sites 2, 3 and 4 should be excluded as they push development closer to the villages and are not sustainable locations as the distance from the town centre is too great to encourage active travel. There are also concerns about drainage for site 4 as the field is higher than existing properties and if built upon could exacerbate existing problems in other areas.

Instead underused garage sites at for example Orchard Road, Elm Hayes, Newlands Road and Dicketts Road should be redeveloped as should the small patch of waste ground at Arnolds Mead and the unused field adjacent to Corsham Primary School Pound Pill.

The area along Lacock Road to the east of St Patrick's School should be assessed as it is a more sustainable location as it is close to the town centre and a level walk.

Land to the west of Potley could also be considered for low density housing due to its proximity to Leafield Industrial Estate to enable more people to walk to work. For a similar reason site 5 should be taken forward and used first so that those working at MoD Corsham could have the opportunity of housing which is within walking distance.

CO4. What land do you think is the most appropriate upon which to build?

Site 5 and 1 and/or new sites identified within the existing settlement boundary such as underused garage sites or sites along Lacock Road which are within easy walking distance of the town centre would be the most appropriate sites on which to build.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham26

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

Seems appropriate although there has been a lot of new housing which puts pressure on existing services such as doctors.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Another GP Surgery

CO3. Is this the right pool of potential development sites?

No. Development should not go any further south of the town on greenfield sites.

CO4. What land do you think is the most appropriate upon which to build?

Previously used land close to the centre.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham27

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Another GP Surgery is needed

CO3. Is this the right pool of potential development sites?

No. There should not be any development to the South of the town on greenfield sites.

CO4. What land do you think is the most appropriate upon which to build?

Sites close to the town centre

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham28

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

About right

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

We also need more allotments

CO3. Is this the right pool of potential development sites?

No. Sites 2, 3 and 4 should be excluded as they push development closer to the villages and are too far from the town centre. There are also concerns about drainage for site 4 as the field is higher than existing properties. Instead underused garage sites around the town should be redeveloped as should the small patch of waste ground at Arnolds Mead and the unused field adjacent to Corsham Primary School Pound Pill. The area along Lacock Road to the east of St Patrick's School should be assessed as it is a more sustainable location as it is close to the town centre and a level walk. Land to the west of Potley could also be considered for low density housing due to its proximity to Leafield Industrial Estate to enable more people to walk to work. For a similar reason site 5 should be taken forward and used first so that those working at MoD Corsham could have the opportunity of housing which is within walking distance.

CO4. What land do you think is the most appropriate upon which to build?

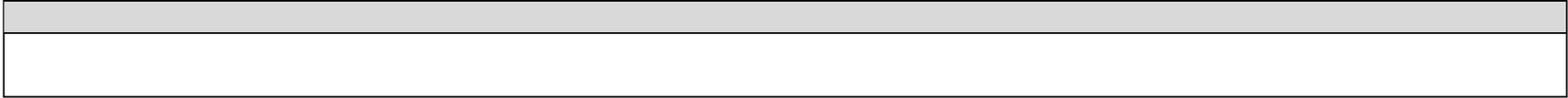
Site 5 and 1 and/or new sites identified within the existing settlement boundary such as underused garage sites or sites along Lacock Road which are within easy walking distance of the town centre would be the most appropriate sites on which to build.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Should we be looking for sites for green energy production instead of sites for housing?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments



Rep ID: Corsham29	
Consultee code: Other	Consultee Organisation (if applicable): Qualasept Pharmaxo Holdings Limited (QPHL - includes Bath ASU)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: CORS29a CORS29b CORS29c
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>This section covers the QPHL responses to questions 1, 3, 4 and 5.</p> <p>The SHELAA sites adjacent or in proximity to MoD Corsham and the Corsham Science Park that were excluded at Stage 2 should be reinstated and reviewed in the context of the requirement for employment land to realise the growth potential of existing business clusters and the creation of new enterprises in the life science, biomedical, defence and digital/cyber sectors. In Planning for Corsham: The Local Economy paragraphs 17 & 18, the Council states that it “has assessed what additional land is needed for business in each of the economic zones of the County. These zones encompass many settlements. It has considered how best to accommodate needs for new business by testing different distributions. On current evidence, further employment land is not needed at Corsham. Land is already allocated in both Local and Neighbourhood Plans. Employment land supply has been reviewed and the existing supply is available and capable of meeting the needs.”</p> <p>The statement fails to recognise the success of Corsham’s key economic sectors and fails to plan for the continued growth of these sectors in the Corsham area.</p>	

The statement is at odds with a later section of the documents as in Planning for Corsham: Settlement Profiles - The local economy.

The document identifies that:

- “There is a high concentration of employment in the Real Estate, and Information and Communication sectors.
- Corsham Science Park continues to grow with Bath ASU completing a new purpose-built manufacturing and Research and Development facility increasing high skilled jobs in the area. A final phase of flexible business units has been completed* to meet market demand.”

(*The settlement profile also assumes that the Science Park has met market demand and there is no requirement for further growth. This is incorrect, as the owners of the Park wish to continue to expand, but due to the lack of local employment land, are unable to do so at this time.)

- “Ark Data Centres have continued to expand their large-scale data facilities at Spring Park.
- Corsham Science Park delivery presents opportunities to increase high skilled jobs.”

However, the draft Plan then fails to provide additional employment land in the area to allow further expansion and clustering of high skill/high value businesses in the life science, biomedical, defence and digital/cyber sectors, all of which have the potential and appetite to continue to expand in Corsham, should employment land be made available proximate to existing clusters thereby enabling synergies with existing businesses and specialisms.

The SWLEP’s emerging Local Industrial Strategy – Cyber Resilience Alliance recognises that “Corsham is home to a growing cluster of digital industries and a unique ICT infrastructure has built up around Corsham where the Ministry of Defence (MOD) and the private sector have invested heavily in secure communications and data storage” and states that that there is a need for more Office and Lab space, if the sector is to reach its potential – “Increasing the supply, particularly around clusters, will relieve increasing office costs, and also enable collaboration between adjacent firms,” (1)

The Swindon and Wiltshire Strategic Economic Plan clearly recognises the potential of the infrastructure at MoD Corsham – “A unique ICT infrastructure has built up around Corsham where the Ministry of Defence (MoD) and the private sector have invested heavily in secure communications and data storage. Corsham is home to a growing cluster of digital industries as well as the most secure cloud data centre and electrical supply in the country” (2), which benefits, not only cyber businesses, but also as [NAME REDACTED] CIO of the UK’s Ministry of Defence states: “the MoD’s digital capabilities would be the equivalent of the foundries of the industrial age, “around which people can coalesce, where really amazing products get thought about, designed and turned into usable products”(3).

For this vision to become a reality at Corsham, more employment land is required proximate to MoD Corsham to enable ‘spin out’ and synergistic collaborations with other sectors, particularly the data storage and life science clusters in Corsham. The Corsham

cluster sits in a prime location between the emerging Life Skills sector of Bristol and the South West and the traditional heartland of the sector along the M4.

However, without the provision of further employment space at Corsham, the cluster will become constrained as Cognisant Research's review of Life Science and Incubator research and development laboratory space in the sub-region identified: "There is a recognised shortage of Life Science Lab space across Wiltshire and the sub-region, constraining both new occupiers and existing life science businesses."

The report goes on to say, with particular reference to the cluster activity in Corsham, that: "The opportunity to develop additional incubator and grow-on space to support start-up and scale-up businesses is clearly consistent with the strategic economic objectives of Swindon and Wiltshire and provides an opportunity to consolidate the growing regional life sciences cluster, developing quality laboratory space that runs from the south to the north of the county. Providing this on an existing Science Park with a large, innovative and growing Pharmaceutical group the additional benefits of local campus and network can be supported and will be attractive to future tenants."(4)

The Wiltshire Core Strategy Core Policy 43: Additional Employment Land identifies: "that Wiltshire does not have land available in the right location at the right time to meet business needs and this could result in Wiltshire losing business to other locations where a more favourable business and regulatory environment exists. Core Policy 34 therefore supports the delivery of opportunities for the provision of employment land that may come forward in the Principal Settlements, Market Towns and Local Service Centres of Wiltshire, in addition to the employment land which is allocated in the Core Strategy...A number of target sectors were identified for Wiltshire in order to promote the move towards a higher-value economy. These include:

- advanced engineering and manufacturing
- Bioscience
- ICT and creative industries"

CP34 states that: "Proposals which support these target sectors will be supported providing they meet the requirements of Core Policy 34." And that, "Outside the Principal Settlements, Market Towns and Local Service Centres, developments will be supported that:

i. are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements."

We consider that it is logical to apply the policy considerations in CP34 to the WLP: Planning for Corsham draft, otherwise the new Local Plan will fail to capitalise on the unique ICT/cyber/defence cluster that has built up around MoD Corsham and the life science/biomedical specialism cluster that has grown around Bath ASU.

Therefore, we propose that the WLP: Planning for Corsham document reflects the unique opportunities that exist in the Corsham/Rudlow area linked to the life science, biomedical, defence and digital/cyber sectors and addresses the lack of appropriate employment land.

We propose that:

The SHELAA sites adjacent or in proximity to MoD Corsham and the Corsham Science Park that were excluded (at Stage 2) should be reinstated and reviewed in the context of the requirement for employment land to realise the growth potential of existing business clusters and the creation of new enterprises in the life science, biomedical, defence and digital/cyber sectors.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

The draft priorities that have been identified for Corsham require revision. We would reword the current:

Maintain the separate identities of Corsham from the settlements to the west of the town (Rudloe, Westwells and Neston)

Whilst it is understandable that communities wish to retain their separate identities, this blanket statement does not clearly define what “maintain the separate identities of Corsham from the settlements to the west of the town (Rudloe, Westwells and Neston)” means. If it relates to the coalescence issue that is identified in the Corsham Neighbourhood Plan (Policy CNP E5), the development of the Redcliffe Homes site between Bradford Road and Park Lane, has had the effect of significantly reducing the gap between settlements, leaving the ‘green buffer’ as an arbitrary identification of undeveloped land, rather than a strategic green corridor.

We would propose that the following Priority be Added:

Realise the growth potential of existing business clusters and allow the creation of new enterprises in the life science, biomedical, defence and digital/cyber sectors adjacent or in proximity to MoD Corsham

CO3. Is this the right pool of potential development sites?

See response within answer to question 1

CO4. What land do you think is the most appropriate upon which to build?

See response within answer to question 1

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

See response within answer to question 1

CO6. Are there any issues or infrastructure requirements that should be identified?

No Comment

Further comments

In relation to our collective response contained in question 1 -

Supporting Information & References:

(1) LEP Industrial strategy - CYBER RESILIENCE ALLIANCE A Science and Innovation Audit Report sponsored by the Department for Business, Energy and Industrial Strategy.

“Provision of Facilities and Infrastructure: ...

it is viewed that there are gaps in:

- Availability and Affordability of Grade A Office Space (all sizes): As set out by Savills, cyber security firms are set to take up to one million sq. ft in office space across the UK by 2022. Given the demand within the sector, combined with the need for firms to ensure working space that complies with their respective standards and accreditation (ISO 27001, Cyber Essentials etc), many consultees have identified the perceived shortage of high-quality office space at all levels (for small to large teams), and the prohibitive costs associated with office rental. Increasing the supply, particularly around clusters, will relieve increasing office costs, and also enable collaboration between adjacent firms – thereby supporting the region’s ambition to rapidly grow the sector” (<http://www.savills.co.uk/news/article/72418/228713-0/3/2018>)

• Provision of Product Testing and Validation Labs: One essential process within the industry is testing products and services to provide greater assurance to consumers of the overall validity of the product being offered. As such, there are several testing labs/facilities across the UK, providing CTAS and CHECK testing accreditations which identify any weaknesses utilising publicly known vulnerabilities and common configuration faults. However, joining these schemes can be prohibitively expensive for SMEs, and take up is therefore viewed not as high as it could be with the provision of support.

“Government: In addition to the University base, the region is also home to a several nationally and internationally significant public bodies with respect to defence, security and research. These include: Defence and Security: GCHQ... It is headquartered in Cheltenham with their site there being home to around 4,000 employees. Sitting within GCHQ is the National Cyber Security Centre (NCSC), an organisation that provides advice to support to the public and private sector in how to avoid computer security threats... GCHQ work closely with allied agencies such as the US National Security Agency (NSA) and the US Department of Defense (DOD). Ministry of Defence (MOD) Joint Cyber Unit (Corsham / Cheltenham), Global Operations and Security Control Centre (Corsham), Defence Fulfilment Centre (Telford) One such Cyber Corridor organisation is MOD Corsham in Wiltshire, where in 2016 as part of the SDSR and in a move to further strengthen the UK’s cyber defences, the former Defence Secretary Michael Fallon announced that over £40 million will be spent on a new Cyber Security Operations Centre (CSOC) to protect the MOD’s cyberspace from malicious actors. The CSOC will work closely with the National Cyber Security Centre to facilitate the sharing of MOD cyber security challenges and contribute to wider national cyber security. Defence Science and Technology Laboratory (DSTL): The DSTL headquartered in Porton Down, Wiltshire is an executive agency of the MOD and one of the principal government organisations dedicated to science and technology in the defence and security field. DSTL supply specialist services to the MOD and wider government. 60% of MOD’s science and technology programme (total funding: £410 million) is supplied by external partners in industry and academia worldwide”

“Corsham is home to a growing cluster of digital industries and a unique ICT infrastructure has built up around Corsham where the Ministry of Defence (MOD) and the private sector have invested heavily in secure communications and data storage”

(2) Swindon and Wiltshire Strategic Economic Plan – SWLEP January 2016

“Swindon and Wiltshire as a hub for innovation. Innovation continues to be central to our Strategic Economic Plan. It is typified by the number of global innovators who have invested and prospered in the Swindon and Wiltshire area such as Honda, Intel and Dyson as well as the presence of a number of innovation-driven sectors including health and life sciences, pharmaceuticals, mobile telecommunications, digital and high value manufacturing. They actively continue to invest in research, design and development, create new employment and offer supply chain opportunities for smaller companies in the local area and beyond”

“A unique ICT infrastructure has built up around Corsham where the Ministry of Defence (MoD) and the private sector have invested heavily in secure communications and data storage. Corsham is home to a growing cluster of digital industries as well as the most secure cloud data centre and electrical supply in the country. There are also strong links with the 100,000 Whole Genome Project and secure Government communications. As ‘big data’ and cyber security become even more important in the

digital economy nationally and internationally, the economic potential of this infrastructure to create a leading digital economy cluster is evident”

“The availability of strategic sites across Swindon and Wiltshire plus the growing network of development sites across Corsham, Porton, Salisbury and Swindon therefore have the potential to draw in new investment nationally and from overseas. These investors will benefit from our unique combination of expertise with the potential to foster collaborative activity and spur further innovation and invention”

(3) [NAME REDACTED], CIO of the UK’s Ministry of Defence, (source: CIO Town Hall Live forum, Statesman Media Group 2021) [NAME REDACTED] vision for the department’s digital transformation is to create a ‘digital foundry’ for the MoD. In his analogy, the MoD’s digital capabilities would be the equivalent of the foundries of the industrial age, “around which people can coalesce, where really amazing products get thought about, designed and turned into usable products”.

Accessing digital innovation from SMEs will be crucial to creating that foundry, [NAME REDACTED] explained. “Part of that would be an innovation hothouse for SMEs, that has them coalesce around a conversation – ostensibly about defence – and using them to help deliver capability much faster through to the front line,” [NAME REDACTED] explained.

(4) Life Science and Incubator research and development laboratory space market review for the M4 (Bristol / Bath / Swindon and Wiltshire) corridor January 2021 Cognisant Research

A review of Research and Development laboratory and incubator space accessible to the Life Science sector across Bristol, Bath, North Wiltshire and Swindon (the M4 corridor). This report explores current R&D lab space provision and considers the economic implications of delivering additional Life Science Lab Space.

“The M4 corridor region between Bristol and Swindon provides a significant opportunity for growth for the Life Sciences sector, by building on the existing network in the region. Indeed, the cluster of businesses and academic institutions in the area make it a perfect bridge between the emerging South West sector and the established Golden Triangle. Crucial to increasing economic growth in this sector will be the availability of suitable research and development and incubator laboratory space”

“Laboratory space for new start-ups and small businesses is currently located on research campuses or shared serviced facilities, such as Porton Down and Corsham Science Park (Unit DX), offering more flexibility to users through bespoke terms of use. There is a recognised shortage of Life Science Lab space across Wiltshire and the sub-region, constraining both new occupiers and existing life science businesses. The creation of Unit DX resulted in an immediate and significant uplift in life science start-ups within the South West region, highlighting the need and impact of these types of facilities to promote growth.”

“Corsham sits in a prime location between the emerging Life Skills sector of Bristol and the South West and the traditional heartland of the sector, the Golden Triangle, accessible along the M4”

“The success of the Unit Dx incubator, combined with the enquiries received by both the agent and landlords of Corsham Science Park for the potential for serviced laboratory accommodation, demonstrates the demand for this provision. Whilst our consultation with commercial property agent, Whitmarsh Lockhart has highlighted that existing provision is highly limited in the

M4 and that Life Science Lab incubator space for start-up businesses operating in the life science sector in north Wiltshire is not economic or well-suited to commercial funding”

“The opportunity to develop additional incubator and grow-on space to support start-up and scale-up businesses is clearly consistent with the strategic economic objectives of Swindon and Wiltshire and provides an opportunity to consolidate the growing regional life sciences cluster, developing quality laboratory space that runs from the south to the north of the county. Providing this on an existing Science Park with a large, innovative and growing Pharmaceutical group the additional benefits of local campus and network can be supported and will be attractive to future tenants”

Rep ID: Corsham30	
Consultee code: Other	Consultee Organisation (if applicable): The Campaign to Protect Rural Wiltshire (CPRE)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>The town is reasonably well-balanced regards employment and new housing. There is plenty of employment, MOD based jobs, and some out commuting to Chippenham. Brownfields should be identified through the Neighbourhood Plan review and soon in order to take account of changes post Covid to retail, offices and employment numbers.</p> <p>Proposed number to be spread over the 2016-2036 period seems reasonable but should be reviewed on an annualised basis.</p>	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Concerns on containment in order to protect against coalescence with surrounding hamlets.	

There are pressures for a second supermarket. Why not encouragement of small shops and businesses?
Current employment and economic conditions need new reports to evidence the changed conditions.

CO3. Is this the right pool of potential development sites?

This should be decided through the Neighbourhood Plan.

CO4. What land do you think is the most appropriate upon which to build?

This should be decided through a review of the Neighbourhood Plan.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

New housing should be developed by housing associations working with the council for social housing. There is more than adequate provision of market housing

CO6. Are there any issues or infrastructure requirements that should be identified?

An area to be safeguarded for a train station and its access.
There should be a new strategic flood risk assessment.
Provision of safe walking routes from new developments has not been addressed and must be.

Further comments

Rep ID: Corsham31	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): PlanningSphere
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Redcliffe Homes	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: CORS31
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>4.0 Response to the Consultation</p> <p>(i) National Policy Context</p> <p>4.1 Paragraph 16 of the NPPF requires that plans should be ‘...(a) prepared with the objective of contributing towards sustainable development’; and ‘...(b) be prepared positively, in a way that is aspirational but deliverable’.</p> <p>4.2 In respect of non-strategic policies, Paragraph 28 of the NPPF states that LPAs should allocations to promote sustainable development, and Paragraph 29 states that ‘...policies should be underpinned by relevant and up to date evidence’ and ‘...take into account relevant market signals’.</p> <p>4.3 Paragraph 30 states: ‘...once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict, unless they are superseded by strategic or non-strategic policies that are adopted subsequently.’</p>	

4.4 Paragraph 59 requires that as part of the Government's objective of significantly boosting the supply of new homes, '...it is important that sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed...'

4.5 Paragraph 61 states that the '...size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies... ..'

4.6 Paragraph 68 states that '...small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly'.

4.7 Paragraph 72 states that '...The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities....'

b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;...'

(Our emphasis in bold)

(ii) Spatial Strategy and distribution of growth in the Chippenham HMA

4.8 Corsham falls within the proposed Chippenham Housing Market Area, which replaces the former North and West Housing Market Area. The change from three to four HMAs is broadly supported. However, for the reasons explained below, we do not consider that the spatial strategy for delivering the growth is sound on the basis of deliverability, or through acknowledgement of societal change that has been accelerated by the covid pandemic.

4.9 The Regulation 18 spatial strategy for the HMA is reliant to high degree on the delivery of the strategic growth options at Chippenham. At the other end of the settlement hierarchy, it is noted that the Regulation 18 Spatial Strategy is relying upon Neighbourhood Plans to deliver housing growth at Large Villages and other rural settlements in the rural hinterland outside principal settlements and market towns across the whole county.

4.10 Wiltshire Council has a poor track record in timely delivery of large urban extension strategic sites, such as Ashton Park in Trowbridge and the West Warminster Urban Extension, both of which were allocated in the adopted Core Strategy and have not yet commenced. At the other end of the scale, Neighbourhood Plans have failed to make any real meaningful contribution to housing delivery in Wiltshire. In this regard it is noted that the CNP did not make any new housing allocations, and was effectively a restraint plan.

4.11 Given that the covid-pandemic has accelerated the trend towards flexible home-working and internet shopping, and that there is now a clear road map to the decarbonisation of private transport (electric vehicles), with transformation expected to take place over the plan period to 2036, we submit that the proposed Regulation 18 spatial growth strategy is too weighted towards the principal settlements. We consider that more growth should be directed towards market towns and rural areas. This approach

would place less reliance upon volume home builders to deliver of a small number of complicated strategic sites (for which there is poor delivery track record in Wiltshire) and would enable a greater role for SME regional housebuilders to deliver the housing requirement through a larger number of smaller scale housing developments in market towns and rural areas.

4.12 In the context of Wiltshire Council not currently being able to demonstrate a 5-year housing land supply across its whole administrative area (NB. 4.56 years in the last published Annual Monitoring Report with a base date of April 2019), combined with the NPPF requirements, as summarised above, and the importance of the SME sector in delivering smaller and medium sized sites to diversify choice of new housing provision, it is in our view imperative that the Council allocates sufficient smaller/medium sized sites at the Market Town level of the identified settlement strategy. This is particularly important in the Chippenham HMA where the deliverability of large-scale strategic sites is both technically and politically challenging.

4.13 Under the proposed growth strategy for Chippenham HMA, the Local Plan Review identified need for Corsham is 815 homes over the plan period to 2036. Having regard to existing commitments the residual need is 120. However, the Council claim that 160 homes will come forward as through windfall/brownfield opportunities – NB. we have not seen the detailed evidence to substantiate this figure.

4.14 Therefore, for the reasons outlined above, and to ensure the delivery of new open market and affordable homes in Corsham, it will be imperative that additional housing allocations are made in the Local Plan Review, to ensure continuity of supply in the Chippenham Housing Market Area over the plan period to 2036.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO3. Is this the right pool of potential development sites?

CO4. What land do you think is the most appropriate upon which to build?

(i) Site Description and Context

2.1 The subject site, which referred to as the Phase 2 site at Bradford Road, Corsham, extends to 8.71 ha, as outlined in red in the Site Location Plan at Appendix A.

2.2 The site comprises an arable field with defensible boundaries: Bradford Road to the north, Park Lane to the south, Skynet Drive to the west and the Phase 1 residential scheme that has been developed by Redcliffe Homes to the east.

2.3 There is public right of way that runs from Bradford Road to Park Lane on the eastern side and high voltage power lines.

2.4 The site lies approximately 1km to the west of the Corsham Town Centre, as the crow flies. The site is well located to existing services, community facilities and employment opportunities. The site is also well served by existing bus routes. For further information on the site accessibility please refer to the Transport Technical Note at Appendix C. [see attachment CORS31 for Figure 1 and appendices]

(ii) Existing Lawful Use and Planning history

2.5 The subject site is in use as agricultural land. Planning history recorded on the Council's public access system includes the following decisions in respect of the Phase I site:[see attachment CORS31 for formatted table]

Reference Description Decision

17/11032/REM Reserved Matters Submission (Appearance, Landscaping, Layout and Scale) Pursuant to Outline Planning Consent 17/06091/VAR (Previously 15/10519/OUT). Re-submission of Reserved Matters Ref. 16/09292/REM.

Permitted

21.12.2017

15/10519/OUT

Development of up to 170 Dwellings, Medical Centre/Community Hall, Public Open Space, Access & Associated Works (Resubmission of 14/04179/OUT)

Permitted

26.11.2015

2.6 Other relevant planning history is referred to below relates to the Bellway site to the west of Skynet Road south east of Bradford Road:[see attachment CORS31 for formatted table]

Reference Description Decision

17/12270/REM

Partial reserved matters for layout, scale, appearance and landscaping of 88 dwellings pursuant to application outline application 17/01661/VAR

Permitted

01.02.2018

13/05724/OUT Up to 88 dwellings, including affordable housing, 1.2 hectares of B1 employment and landscaping

Permitted

02.04.2016

(iii) Existing planning policy context and constraints

2.7 The Development Plan for the site comprises:

- Wiltshire Core Strategy (adopted January 2015);
- Corsham Neighbourhood Plan (made November 2019); and
- Wiltshire Housing Site Allocation Plan (adopted February 2020) [see attachment CORS31 for Figure 2].

2.8 The Corsham Neighbourhood Plan has allocated the subject site as a 'Rural Green Buffer' under Policy CNP – E5.[see attachment CORS31 for Figure 3].

2.9 Policy CNP E5 states: [see attachment CORS31 for text].

3.0 Suitability of the Site for a Mixed Tenure Housing Allocation

(i) Legal ownership and delivery mechanism

3.1 Redcliffe Homes hold a subject to planning option.

3.2 In the event that the subject site is allocated, and planning permission is subsequently granted, Redcliffe Home would fully complete the implementation of scheme early in the plan period within 5 years of allocation.

(ii) Development Parameters

3.3 Further to the technical surveys and initial multidisciplinary assessments that have been completed, a Parameter Plan has been formulated to indicate the potential developable area extent of approximately 5.29ha. This in turn has led to initial capacity assessment, which suggests that the subject site is capable of accommodating approximately 140- 150 homes at a similar density to Phase which was built out at 29 dwellings per hectare (dph).[see attachment CORS31 for Figure 4].

3.4 The key elements of the indicative Parameter Plan include the following:

- Vehicular access: is proposed as a priority junction with a right-hand filter lane from Park Lane. Adequate visibility splays can be formed in both directions, as explained in the Transport Technical note at Appendix C. There is potential to maximise non-car accessibility by providing direct pedestrian and cycle links to the Phase I site and enhancement / resurfacing of the existing right of way that bisects the site providing a connection between Rudloe to Corsham.
- Landscape mitigation: the site is not prominent in the wider landscape. Public views are only available at the short-range distance from around the perimeter of the site, which already benefits from existing trees and hedgerows. There is potential to enhance the screening by augmenting the existing vegetation with new native species tree and shrub planting around the site perimeter. It is also envisaged that new wildlife corridors and avenues of street trees will be provided within a future landscaped masterplan. The separation between the Phase 1 and Phase 2 site is approximately 90m at its widest point. This will provide a substantial gap.

• Ecological mitigation: the site is located in a bat consultation zone. The project ecologists undertook detailed surveys in relation to the Phase I proposals and have a good understanding of the ecological context. Accordingly, they have advised the provision of 25m wildlife buffers around the perimeter of the application site to ensure the provision of dark vegetated corridors along known bat foraging routes. There is sufficient land available to deliver the required minimum 10% biodiversity net gain on site – on the assumption that this will be a mandatory requirement following the enactment of the Environment Bill. The finalised masterplan will be subject to an agreed Landscape and Environmental Management Plan (LEMP), which will be implemented by the future private management company that will be set up to maintain the areas of common ownership.

• Drainage and easements: the foul drainage will connect to existing mains systems. Infiltration testing has confirmed that it will be necessary to attenuate surface water runoff in swales and attenuation basins as part of a comprehensive green-blue infrastructure strategy.

(viii) Proposed further work in progress to develop the evidence base

3.5 Following the submission of the Regulation 18 representations, the project team will commission the following further work:

- Arboricultural survey
- Infiltration testing
- Liaison with Wessex Water in respect of foul drainage connections
- Further bat surveys

3.6 The project team will be willing to share this information as part of an evolving technical evidence base with the Council's Spatial Planning Team.

3.7 At the appropriate time, Redcliffe Homes, will appoint a masterplan architect / urban designer to formulate an illustrative masterplan. This will then be tested internally before being progressed as a pre-application enquiry. Feedback from the pre-application enquiry can then be added to the technical evidence base in advance of the Local Plan Review examination in due course. Redcliffe Homes also commit to undertaking public consultation in advance of submitting any formal planning application.

(iii) Comment on the subject site

4.15 It is understood that the external consultants acting for the Council have assisted in assessing prospective development sites. Wiltshire Council's high-level summary assessment has excluded the subject site from of the 'final pool of potential sites for further detailed assessment'. We comment on this omission further in the assessment table below.

4.16 The assessment of the subject site is summarised in the report under SHELAA reference 1101. The high-level 'traffic light' assessment of the constituent elements of the subject site is set out below in Figure 4: [see attachment CORS31 for table].

4.17 Using the Council's Traffic Light Assessment, we have undertaken a similar appraisal utilising the site-specific evidence base. This is set out in the table below:[see attachment CORS31 for table].

WC Traffic Light Assessment PlanningSphere Response Accessibility: The evidence prepared by Miles White Transport at Appendix C provides a summary of the site location and its accessibility. In summary, the subject site is located in close proximity

to existing services, community facilities. The site is also well connected by bus services and has good accessibility to footways, PROWs and level access and safe cycle access to the town centre. On this basis, we agree with the 'green' categorisation.

Flood Risk: The site lies in Flood Zone 1 on the Environment Agency's Flood Map for Planning. A technical solution is available for surface water attenuation and disposal at less than the existing greenfield run off rate to existing watercourses. On this basis, we agree with the 'green' categorisation.

Heritage: There are no know heritage assets proximate to the site, and low archaeological potential. On this basis, we agree with the 'green' categorisation.

Landscape: We fundamentally disagree with the landscape assessment which is based on: (i) the CNP green space allocation; and (ii) the potential impact on the Bradford on Avon and Bath Special Area of Conservation (SAC). Paragraph 30 of the NPPF makes it clear that Neighbourhood Plan can be superseded by non-strategic policies and allocations. While we accept that it would be politically challenging for the LPA to supersede a neighbourhood plan green buffer designation, we consider that the subject site should be considered on its merits as in all other respects is sustainable site for residential development. We submit that Council was wrong to reject the site on the basis of the CNP green buffer designation alone without first having undertaken an objective assessment of the development potential of site on its own merits. An assessment would have to acknowledge that the context of the site has fundamentally changed following the implementation of the Phase I Redcliffe scheme and the Bellway scheme (17/12270/REM) at Skynet Drive, which is presently on site. The subject site is now surrounded by built development on all sides. Its current use for mono-agricultural crops combined with the unmanaged perimeter trees and hedgerows, is not of significant visual amenity value. Nor is the site prominent in longer range views. The Parameter Plan at Appendix B is proposing a generous 25m wide vegetated buffer around the perimeter of the site. A large area of open space is also proposed as a buffer between the Phase 1 Redcliffe site providing up to 170m of separation between the two phases, which will maintain a rural buffer. The project ecologists have advised that with mitigation, in the form of 25m wide dark vegetative buffers around the perimeter of the site, a development proposal would be capable of passing a Habitat Regulation Assessment in terms of its impact on bat habitat associated with the SAC. The ecological constraint highlighted in the Council's assessment is therefore capable of being designed out. On this basis we disagree with the 'red' categorisation and assess this category as 'orange'.

Traffic: The Transport Technical Note at Appendix C explains that an acceptable vehicular access solution is available from Park Lane. On the basis we agree with the 'green' categorisation of the site.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

PlanningSphere have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of Redcliffe Homes who are the option holders of land at Bradford Road, Corsham. The subject site is outlined on the Site Location Plan shown at Appendix A.

This representation follows the near completion on site of the first phase of development of 170 No. Homes (LPA Refs: 15/10519/OUT and 17/11032/REM).

The representation contends that in order to meet the required plan-making test of 'soundness' and maintain mixed-tenure housing delivery in the Chippenham Housing Market Area over the plan period to 2036, it will be necessary for the Council to allocate of the subject site in the Local Plan Review. This is on the basis that the subject site is the most sustainable prospective development site in Corsham, and is available, technically deliverable and viable.

The representation is supported by technical and delivery evidence set out in the Appendices. We would welcome an opportunity to discuss the promotion of this site through subsequent stages of the Local Plan Review with the Council's Spatial Planning Team in due course.

5.0 Conclusions

5.1 In strategic planning terms, the growth distribution strategy set out in the Regulation 18 consultation draft is too weighted towards large scale complex sites adjacent to principal settlements. Having regard to societal and technological changes that have been accelerated by the covid-pandemic, we advocate a more decentralised strategy to meet the growth requirement with more development distributed to market towns and rural areas. Such an approach would enable the SME housing building sector to play a greater role in the delivery of the housing requirement, which would ensure a more diverse and even supply of new housing over plan period. SME developers also tend to deliver housing at a higher build and design quality than volume home builders, as has been shown in consumer satisfaction surveys. Market towns and larger settlements in rural areas remain sustainable places in which to develop and should not be allowed to decline at the expense of hard to deliver strategic site allocations.

5.2 We fundamentally disagree with the Council's rejection of the subject site on landscape grounds. This has highlighted a situation whereby a well-intentioned green buffer designation in the CNP may result in less sustainable and suitable sites being allocated for housing contrary to the wider public interest.

5.3 The CNP green buffer is not green belt, and the area of land in question is not of any significant amenity benefit in its current condition and mono crop agricultural use. The site is surrounded by existing built development and is in all other respects a suitable site for housing development. On this basis it is entirely legitimate for the LPA to review the appropriateness of this CNP green buffer designation in a local plan review, and to assess the merit of the subject site being developed for housing to assist in meeting a need for housing delivering of the plan period.

5.4 We therefore submit that in order to meet the test of soundness, the Council should allocate the subject site on the basis that it is: (i) available; (ii) technically deliverable; and (iii) is viable for delivery early in the plan period.

5.4 In summary, the allocation of the subject site would deliver the following benefits:

- A sustainable location with good access to public transport and existing facilities.
- A site suitable for delivery of circa 150 homes by an SME home builder and viable to deliver a 30% element of affordable housing provision.
- A perimeter buffer of 25m to provide screening and a wildlife corridor.
- A separation buffer between Phases 1 and 2 of up to 170m. This will maintain a sense of spatial separation.
- The ability to mitigate the impact of development from publicly accessible local viewpoints.
- The ability to address ecological constraints (bats) and deliver a biodiversity net gain on site.
- The site is situated within Flood Zone 1 and surface water attenuation can be managed as part of an integrated green and blue infrastructure strategy.
- Provision of a substantial areas of onsite publicly accessible open space and allotments.
- Provision of public access through the site connecting into the wider footpath and cycleway network maximizing the opportunities for non-car access.

Rep ID: Corsham32	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Woolf Bond Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: CORS32a CORS32b CORS32c
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>The below extract taken from the Corsham specific paper indicates an intention to reduce the overall level of growth at Corsham over the forthcoming 20 year plan period when compared to the previous Core Strategy plan period (that also covered a total of 20 years):</p> <p>Extract from the Corsham Consultation Paper [see attachment CORS32a for diagram]</p> <p>In our response to “The Emerging Spatial Strategy” document, we have set out a detailed response relating to the merits of a greater level of housing growth at Corsham than currently proposed or was envisaged in the previous Core Strategy plan period. This is relevant to our client’s land that forms a substantial land holding that lies adjacent to all sides of the southern edge of Corsham. As illustrated in detail below, our client’s land offers a substantial opportunity to assist in facilitating the reopening of Corsham train station and also in rebalancing the scale of housing growth more to the south of Corsham when compared to the substantial growth in a northward direction that has occurred over the previous decade.</p>	

A summary of our representation contained in our response to the spatial strategy is indicated in bold below and advocates a more ambitious growth strategy for Corsham that could in turn allocate one or a number of our client's sites assessed in the Corsham specific consultation document:

For these reasons it follows that rather than a reduction in anticipated growth at Corsham it would be highly logical to pursue a more ambitious growth strategy so to facilitate the new train station objective. Such an approach is also consistent with the general sustainability and accessibility merits of the town, reduces the risk of market saturation at in particular Chippenham and would reflect the fact that the market has delivered at Corsham in recent years. Further Corsham's strong housing market would be anticipated to continue to facilitate a deliverable housing distribution strategy.

If one were to take a 4% proportion of the overall County housing target, approximately 1,830 dwellings could be forthcoming at Corsham. This would remain substantially below a number of other market town settlements located in this HMA but would reflect the numerous beneficial elements of housing growth at Corsham described above.

For these reasons, it is strongly considered that a greater level of growth than that presently envisaged for Corsham would be beneficial in enabling a sustainable housing growth strategy. Such an approach would add considerable flexibility to the county's housing growth strategy and in turn would be consistent with the effective and justified tests of soundness.

In response to the potential inclusion of a potential brownfield target, we agree with the sentiments referenced at paragraph 14 of the consultation document whereby brownfield sites to be met by a yet unidentified windfall allowance cannot be relied upon and consequently there is likely to be a need to allocate further greenfield land. This is especially applicable given the overall housing requirement for the County (and its associated distribution throughout the respective settlements) are not to be treated as a ceiling but instead as a minimum figure. Such an approach is consistent with NPPF paragraph 60 that refers to determining and planning for a minimum number of homes.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

We have no specific comments upon the place shaping priorities. However, for the reasons discussed later in this representation, development on the southern side of Corsham offers a particular opportunity in relation to the viability and likelihood of the reopening of Corsham train station. In addition, it is noted that subject to appropriate mitigation (landscaping etc.) none of our client's sites are considered to result in any form of coalescence with the settlements located to the west of the town.

CO3. Is this the right pool of potential development sites?

CO4. What land do you think is the most appropriate upon which to build?

Our response to the spatial strategy document and in response to question C01 refers to the benefits of housing delivery at Corsham of a level above than presently anticipated in the draft document. As acknowledged at paragraph 14 of the document, there is likely to be a need to allocate further greenfield land.

De Vernon Trustees control a large area of land located to the south of the market town of Corsham, available for potential residential development. Their landholding forms site numbers 3653, 3654, 3655 and 3149 as identified in the Corsham site selection report. As confirmed by our call for sites submission, all of these sites are available for potential residential led development.

Development on our client's land would follow the permission granted in the mid 2010's for 64 dwellings on land to the south of Potley Lane (LPA Ref. 14/05686/OUT). This development has been constructed in a high quality manner and evidences our client's proven track record to successfully bringing forward residential development in this area.

Development to the south of Corsham is considered to offer some key benefits when compared to other growth options. These include avoiding the areas to the north and west of the town where potential adverse impacts could arise upon nationally designations, including the Cotswolds Area of Outstanding Natural Beauty. In addition, it would not impact upon the designated heritage assets (namely Registered Park & Garden and Conservation Area) located to the east of the town. Further, of the recent growth that has occurred adjacent to Corsham the substantial majority has occurred on its northern and western sides such that growth at south Corsham enables somewhat of a rebalancing of the growth that has taken place across the town. Further, the existing Core Strategy, the Corsham specific consultation document and the Neighbourhood Plan refer to the longstanding community aspiration to reopen Corsham train station. Key Objective TKO3 of the Neighbourhood Plan refers to the need to "Safeguard site for a new Corsham railway station and its associated infrastructure". Policy CNP T4 accordingly safeguards the land indicated over the page for the construction of a new railway station and its associated infrastructure:

Extract from Corsham Neighbourhood Plan [see attachment CORS32a for figure]

Paragraph 4.4.1 of the Manual for Streets guidance refers to an 800 metre walking distance as forming a distance which residents may access comfortably on foot but that walking can offer the greatest potential to replace short car trips where they

are under 2 Kilometres. The below isochrone map illustrates an 800 metre and 2 Kilometre radius around the siting of the new train station (indicated using a blue star). Site numbers 2, 3 and 4 as controlled by our clients and the site to the north of Potley Lane are indicated using red lines. It is evident that in comparison to any option on the western or northern side of Corsham, the subject sites are far better related to the potential new train station.

Isochrone Map showing proximity of potential new train station to De Vernon sites [see attachment CORS32a for map]

It follows that consistent with chapter 9 the NPPF and the Wiltshire and Corsham level planning documents, growth at south Corsham would directly facilitate non-car modes of travel and realise and encourage an opportunity for proposed new transport infrastructure in the form of the train station. This would be to the benefit of not only additional residential development but the town's existing 13,000 population already in existence. Development in this location therefore represents an exceptional opportunity to help support the viability of new sustainable transport infrastructure and would also balance the overall distribution of housing growth more to the south of the town when compared to the focus that has occurred upon the northern and western sides of the town over the past decade. With these points in mind, we now proceed to consider the respective sites as identified in the "Planning for Corsham" document in turn.

Land east of Leaffield Trading Estate & west of Lypiatt Road (SHELAA Site Reference 3653, Site Development Option 4 in Figure 4 of the Corsham Site Selection Report)

This site forms a large site that extends considerably in a southward direction. Its northern edges directly abut the southern settlement boundary of Corsham. The Council's site selection report identifies that its southern side includes land within the green buffer as identified in the Corsham Neighbourhood Plan. Whilst it is not considered that the development of the southern part of this land would necessarily result in coalescence it is appreciated that the more logical development parcels at this time would form those on its northern side as indicated on the annotated version of the Council's Corsham site selection report plan below.

Annotated Figure 4 from Corsham Site Selection Report showing site development option 4 [see attachment CORS32a for figure]

Having regard to the above plan, approximately 9.3 hectares of land (forming sites "a" and "b") lie outside the green buffer and would be closely related to the existing settlement form of Corsham, whereby commercial development lies to the far west of the area indicated as site "b" and residential development lies adjacent to the northern side of site "b" and to the north and east of site "a". Vehicular access could potentially be provided from the site's eastern boundary direct onto Lypiatt Road. Further, it is noted that in particular site "a" could be identified in isolation dependent upon the level of housing need required. This part of the site in particular is bound by existing vegetation and is therefore very well contained from the wider countryside and benefits from the potential for direct access onto Lypiatt Road. It is illustrated on the satellite image over the page.

Satellite view of potential site "a" within Development Option 4 (Source: Google Earth) [see attachment CORS32a for figure]

The above reduced site comprises 2.5 hectares in size and therefore at a density of circa 30 dwellings per hectare could offer capacity for approximately 75 dwellings. Such a proposal would be appropriately contained by existing landscaping that could be reinforced and would relate well to the settlement boundary that lies adjacent to the site on its northern and eastern sides. Alternatively, sites “a” and “b” could be identified in combination and could offer capacity for somewhere between 200 and 250 dwellings with a likely area of green landscaping located in between. Again, the existing landscaped boundaries could be retained and reinforced. Whilst the wider site 4 development option is available for development in full, we request therefore that these reduced development proposals namely to consider site “a” in isolation or in combination with site “b” are assessed by the authority moving forward. It is considered the either option would offer a highly sustainable housing allocation opportunity for the following reasons:

- A medium density housing led development could be brought forward consistent with the prevailing housing character of the areas located to the north and east of the site. Accordingly, capacity of either 75 (site “a” only) or between 200 and 250 dwellings (on sites “a” and “b” in combination) could be forthcoming.
- The land lies adjacent to the existing Corsham settlement boundary such that it can form a logical extension or rounding off opportunity to this southern side of Corsham.
- The land is located in immediate proximity to the safeguarded land for the new Corsham train station.
- The sites are within a short walking distance of Corsham town centre including The Corsham School that can be easily accessed via the existing footbridge that links to Station Road to the north.
- Existing vegetation can be retained and reinforced so to enable a self contained development opportunity that is not subject to any long distance views.
- Vehicular access can be provided in particular from Lypiatt Road.
- There would be no need for development on the small part of the site that lies within flood risk zones 2 and 3.

When considered on the above basis, site development option 4 would result in no substantive landscape harm, is not located near any designated heritage assets, would not result in any increase in flood risk, is highly accessible to existing services and in particular the reopening of Corsham train station and would not have a negative traffic impact subject to appropriate conventional mitigation.

We would ask that the respective partial allocation options discussed above are considered respectively in future iterations of the Local Plan such that the site could be positively identified as an appropriate and sustainable location for a residential site allocation.

Land east of Lypiatt Road and west of B3353 (SHELAA Site Reference 3654, Site Development Option 3 in Figure 4 of the Corsham Site Selection Report)

Similar to site development option 4, this site forms a large site the extends in a southward direction. Its northern edges directly abut the Corsham settlement boundary and are located outside the green buffer as identified in the Corsham Neighbourhood

Plan. Whilst it is not considered that the development of the southern part of this land would necessarily result in coalescence it is appreciated that the more logical development parcel at this time would form that on its northern side as indicated on the annotated Council's Corsham site selection report plan and satellite images below.

Annotated Figure 4 from Corsham Site Selection Report showing site Development Option 3 [see attachment CORS32a for figure]

Satellite view of potential site outside green buffer within Development Option 3 (Source: Google Earth) [see attachment CORS32a for figure]

Having regard to the above plan, approximately 2.7 hectares of land lie outside the green buffer and would be closely related to the existing settlement form of Corsham whereby residential development lies adjacent to its northern boundary. Vehicular access could potentially be provided from the site's western boundary direct onto Lypiatt Road. The site is bound by existing vegetation on its southern and eastern sides and is therefore well contained from the wider countryside.

At a density of circa 30 dwellings per hectare the site could offer capacity for approximately 80 dwellings. Such a proposal would be appropriately contained by existing landscaping that could be reinforced and would relate well to the settlement boundary that lies adjacent to the site on its northern side. Whilst the wider site 3 development option is available for development in full, we also request that this reduced development proposal is assessed by the authority moving forward. It is considered this development option would offer a highly sustainable housing allocation opportunity for the following reasons:

- A medium density housing led development could be brought forward consistent with the prevailing housing character of the area located to the north of the site. Accordingly, a capacity of 80 dwellings could be forthcoming.
- The land lies adjacent to the existing Corsham settlement boundary such that it can form a logical extension or rounding off opportunity to this southern side of Corsham.
- The land is located in close proximity to the safeguarded land for the new Corsham train station.
- The site is within a short walking distance of Corsham town centre including The Corsham School that can be easily accessed via the existing footbridge that links to Station Road to the north.
- Existing vegetation exists and can be retained and reinforced so to enable a self contained development opportunity that is not subject to any long distance views.
- Vehicular access can be provided in particular from Lypiatt Road.
- A direct pedestrian link could be provided to the Dicketts Road play area to the north.

When considered on the above basis, site development option 3 would result in no substantive landscape harm by virtue of its contained nature comprising existing landscaping that divorces it from the wider farmsteads. Further, it is not located near any designated heritage assets, would not result in any increase in flood risk, is highly accessible to existing services and in particular the reopening of Corsham train station and would not have a negative traffic impact subject to appropriate conventional mitigation.

We would ask that the respective partial allocation option discussed above is considered in future iterations of the Local Plan such that the site could be positively identified as an appropriate and sustainable location for a residential site allocation.

Land South of Brook Drive (SHELAA Site Reference 3655, Site Development Option 2 in Figure 4 of the Corsham Site Selection Report)

Site development option 2 comprises approximately 3.2 hectares of land and would be closely related to the existing settlement form of Corsham whereby residential development lies adjacent to its northern. Vehicular access could potentially be provided from the site's northern boundary direct onto Brook Drive. The site is bound by existing vegetation on its southern side Ladbroke Lane on its eastern boundary and is therefore defined by clearly physical boundaries.

Satellite view of Development Option 2 (Source: Google Earth) [see attachment CORS32a for figure]

At a density of circa 30 dwellings per hectare the site could offer capacity for up to approximately 100 dwellings. Such a proposal would be appropriately contained by existing landscaping that could be reinforced and would relate well to the settlement boundary that lies adjacent to the site on its northern and western sides. It is considered this development option would offer a highly sustainable housing allocation opportunity for the following reasons:

- A medium density housing led development could be brought forward consistent with the prevailing housing character of the area located to the north / west of the site. Accordingly, a capacity of up to 100 dwellings could be forthcoming.
- The land lies adjacent to the existing Corsham settlement boundary such that it can form a logical extension or rounding off opportunity to this southern side of Corsham.
- The land is located in reasonable proximity to the safeguarded land for the new Corsham train station.
- The site is within walking distance of Corsham town centre including The Corsham School that can be accessed via the existing footbridge that links to Station Road to the north.
- Existing vegetation exists and can be retained and reinforced so to enable a self contained development opportunity that is not subject to any long distance views.
- Vehicular access could potentially be provided from Brook Drive.

When considered on the above basis, site development option 2 would result in no substantive landscape harm by virtue of its contained nature. Further, it is not located near any designated heritage assets, would not result in any increase in flood risk, is accessible to existing services and the reopening of Corsham train station and would not have a negative traffic impact subject to appropriate conventional mitigation.

We would ask that the allocation option is considered in future iterations of the Local Plan such that the site could be positively identified as an appropriate and sustainable location for a residential site allocation.

Summary relating to Site Development Options 2, 3 & 4

For the reasons set out above, it is considered that the northern sides of site development options 3 and 4 would in particular offer highly sustainable allocation opportunities on this southern side of Corsham. The same occurs with site development option

2. Whilst the sites have been submitted separately it is noted that they could be linked up to enable a suite of allocations, dependent upon the final identified level of housing need at Corsham.

The site development options can be positively assessed accordingly and are considered to form appropriate development sites that offer the benefits of redistributing some of the growth to the southern side of Corsham and assist in facilitating the longstanding objective of the reopening of Corsham train station.

Additional Site - Land to the North of Potley Lane, Corsham (SHELAA Site Reference 3149)

In addition to the sites identified by the Council for potential development, our client's also control land to the North of Potley Lane as shown on the attached Location Plan (No. WBP1). The site extends to approximately 6ha, comprising a roughly rectangular shaped field as illustrated on the annotated satellite plan below. It adjoins the Corsham settlement boundary on both its eastern and southern sides.

Annotated satellite view of Land to north of Potley Lane, Corsham (Source: Google Earth) [see attachment CORS32a for figure]

The site slopes gradually down from south to north and comprises agricultural land fronting onto Potley Lane / Upper Potley to the south. To the south of the site is Leafield Industrial Estate, whilst the site is bound by residential development on its eastern side. To the west lie agricultural fields. The main line railway forms the site's northern boundary.

The site is naturally contained on all its sides such that it forms a natural rounding off to the settlement. It is contained by clearly recognisable features on its southern side in the form of Leafield industrial estate, on its eastern side by the Pockeridge Road development and its northern side by the railway line and associated landscaping. It therefore represents a very well contained and logical urban extension to the settlement. The site further benefits from a bus stop on its southern boundary and potential vehicular access onto Potley Lane.

The site's assessment in the site selection report is generally positive but it is removed for landscape reasons relating to its whole location within the rural green buffer identified in the Neighbourhood Plan. Policy CNP E5 of that plan refers to the rural green buffer and states that "In the Rural Green Buffer, as defined in Figure 4 (on page 24), approval will not be given for the construction of new buildings which, individually or cumulatively, would lead to the coalescence of settlements".

The definition of coalescence is commonly considered to be the merging or coming together of separate towns or villages to form a single entity. Whilst it is appreciated that the neighbourhood of Westwells is located further to the west of the Leafield Industrial Estate there is already a clear line effectively drawn that forms the western edge of Corsham by virtue of the existing industrial estate to the south. This is indicatively shown on the below plan using a red dashed line.

Annotated satellite image (Source: Google Earth) [see attachment CORS32a for figure]

Whilst development further to the west of the dashed red line could potentially be deemed to form expansion of Corsham in a westward direction such that conceivably Westwells could become a single entity coalesced with Corsham, this does not occur with the subject site by virtue of its western boundary being roughly aligned with Leafield Industrial Estate to the south. The site's development would not therefore result in any type of merging between Corsham and a neighbouring settlement. It is further

noted that the Neighbourhood Plan green buffer policy does not reference bat habitat specifically. It is anticipated that subject to the retention of the existing strong landscape buffer along the site's northern side no primary constraint in ecological terms would exist to the site's development.

The Concept Masterplan extracted below (and attached) illustrates the site's potential to deliver approximately 140 dwellings, alongside sizeable areas of public open space and associated landscaping.

Concept Masterplan [see attachment CORS32a for figure]

This site is generally positively reviewed in the Council's site selection report and whilst it technically lies in the rural green buffer, it is evident that it does not result in a western encroachment away from Corsham that would result in any coalescence.

Consequently, when assessed on a site specific basis there is no technical breach of the neighbourhood plan policy and therefore development could occur on this site in a policy compliant manner.

However, and notwithstanding our judgment that the site as a whole could be developed it is noted that the site forms two logical parcels divided by an area of existing landscaping running in a north to south direction as shown as largely retained on the Concept Masterplan. It follows that in theory only the eastern part of the site labelled as site "a" on the annotated satellite plan provided above could come forward in isolation and any conceivable coalescence risk yet further removed. On this basis we would ask that this site's feasibility for development is reappraised in future Local Plan exercises and in addition whether a smaller parcel namely that identified as site "a" considered as a smaller allocation. That site is approximately 2.5 hectares in size and could offer a capacity of circa 60 dwellings.

For the reasons set out above we request that the feasibility of developing this site (SHELAA Site Reference 3149) is reassessed and in addition the possibility of its eastern half only (namely site "a") being allocated in isolation also considered. The site therefore offers an opportunity for either 140 or 60 dwellings respectively and could be identified as a sustainable residential allocation again located in close proximity to the safeguarded new train station and on the southern side of Corsham where a redistribution of housing growth is appropriate.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Having regard to the Council's site selection report, it is noted that the respective development site options and their proximity to the potential new train station should be acknowledged in future site specific assessments.

Summary

In summary, we make the following key points:

- The spatial strategy as drafted places a disproportionate reliance in particular upon Chippenham town to meet the overall housing requirement identified for the wider Chippenham Housing Market Area.
- The overall level of anticipated additional housing growth at Corsham represents an under provision when compared to the town's significant potential for housing growth as a sustainable market town that can supplement housing delivery at Chippenham. This is evidenced by a comparison between the previous Core Strategy approach and that taken in this emerging document. Contrary to the approach suggested, the level of delivery in Corsham since 2016 evidences a strong housing market that can deliver and supplement the larger strategic sites at Chippenham.
- Additional growth at Corsham (in particular on its southern side) can contribute to the viability and likelihood of the longstanding priority for the potential reopening of Corsham Train Station as prioritised in the existing Core Strategy and the Corsham Neighbourhood Plan.
- It is considered that a greater level of housing growth should be attributed to Corsham so to acknowledge its sustainable merits as a location for further housing growth. In addition, given the pressing need for housing in the Chippenham Housing Market Area (which is presently subject to a housing land supply deficit) formal site allocations should be made through the Wiltshire Local Plan Review process.
- Our clients control a number of sites that have been identified for further assessment within the "Planning for Corsham" document. As set out within this representation they offer the opportunity for either full or partial development in accordance with identified housing needs. They offer sustainable housing allocation opportunities accordingly.
- Through this submission we also request that land to the north of Potley Lane is reappraised as a potential site development option (SHLAA reference 3149).

Further comments

Rep ID: Corsham33	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Gladman Developments
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: CORS33a CORS33b
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>The 'Planning for Corsham' consultation document, and the emerging spatial strategy contained within, proposes a housing requirement of 815 homes for Corsham over the plan period 2016-2036. The document outlines that the residual requirement is 120 homes, once the number of homes built and in the pipeline is deducted from the overall requirement. Footnote 1 of the consultation outlines that, in Corsham, 289 dwellings have been built between 2016-2019 and, at 1 April 2019, 404 homes are already in the pipeline.</p>	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	

CO3. Is this the right pool of potential development sites?

CO4. What land do you think is the most appropriate upon which to build?

As the Council are aware, Gladman are promoting Land North of Bath Road Corsham for residential led development (application reference: 13/05188/OUT). The site benefits from an outline planning permission (allowed at appeal on 25 May 2015) for up to 150 dwellings and up to 1,394 Class B1 (offices) use with associated works. The appeal process demonstrated that the site was suitable for residential development and that there were no technical issues which did not preclude residential development on the site. Subsequently, all necessary Reserved Matters approvals and all other pre-commencement conditions have been lawfully discharged, save for Condition 22. As set out at Figure 1 of the consultation document, it clear that the Council consider Land North of Bath Road as an existing commitment. In view of the current planning status of the site, Gladman assert that the site should be allocated for residential led development in the emerging Local Plan Review.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham34

Consultee code: Landowner

Consultee Organisation (if applicable): Ministry of Defence

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
CORS34

CO1. What do you think to the scale of growth? Should there be a brownfield target?

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO3. Is this the right pool of potential development sites?

Site 5 'The Circus': The site is owned by the MOD and is part of an operational site. It is not available for disposal and consideration for residential development at this time. Please remove it from further consideration and assessment in the local plan process.

CO4. What land do you think is the most appropriate upon which to build?

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham35

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

CO1. What do you think to the scale of growth? Should there be a brownfield target?

I'm not quite sure how much green space needs to be continuously used up. There has been so much housing in our area in recent years.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO3. Is this the right pool of potential development sites?

I am most concerned about zone 4.

CO4. What land do you think is the most appropriate upon which to build?

Regarding Area 4 which is on Lypiatt Rd/Dicketts Rd. These roads are already dangerous with the amount of cars (parked) we certainly don't need more vehicles using these roads.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

The growth of Corsham is inevitable, but still no other doctors surgery is implicated. Also our local bus service is not enough for people people who cannot drive. The walk to town is a fair distance.

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham36

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Land Value Alliances LLP

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
CORS36

CO1. What do you think to the scale of growth? Should there be a brownfield target?

LVA consider the proposed level of growth appropriate and consummate to Corsham, however do not agree with the brownfield target of 160 homes to be met on as yet unidentified windfall sites. This would provide no certainty that the level of growth for Corsham can be achieved over the plan period. LVA see no benefit in a brownfield target and advise the Council should instead undertake detailed assessment of the availability, suitability, deliverability and viability of brownfield sites with a view to providing a sensible method to assessing the level of greenfield sites that will be required.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

No Comment

CO3. Is this the right pool of potential development sites?

LVA are largely supportive of the final pool of potential development sites as set out in the 'Planning for Corsham' paper and believe that some of those listed are appropriate and necessary to meet the scales of growth and the priorities for Corsham over the plan period. We believe that Site 6 Land to the north of 16 Bradford Road (SHELAA site 3250) of 2.2 acres can make an important contribution to Corsham's requirement for a further 120 homes by providing a minimum of 35 dwellings.

Points to note regarding the suitability of the site for development are as follows:

- Services and facilities at Corsham are within walking distance from the site;
- The site is well located in relation to the local highway network with vehicular and pedestrian access feasible;
- The site is flat with very limited views;
- There are no identified ecological or biodiversity constraints;
- The site is not within the Flood Zone;
- No constraints intrinsic constraints have been identified at this stage that would preclude development.

Site 6 Land north of 16 Bradford Road, Corsham is available, suitable and deliverable, and there is no restriction to it contributing towards meeting the housing needs for Corsham and Wiltshire as a whole. The site should therefore be considered for allocation within the Local Plan Review for a minimum of 35 dwellings.

CO4. What land do you think is the most appropriate upon which to build?

The Alternative Development Strategies document for the Chippenham Housing Market Area (HMA) broadly identifies that Corsham appears the most environmentally constrained of all the main settlements in the Housing Market Area, with the Emerging Spatial Strategy therefore proposing this "should lead to a smaller proportion of growth if possible". Taking this in to account, LVA consider that development of Site 6 Land north of 16 Bradford Road, Corsham falls in line with this approach and the site should be allocated for a minimum of 35 dwellings within the Local Plan Review based on it not being subject to any constraints which might affect development.

LVA believes the allocation of smaller sized non-strategic sites such as Site 6 Land north of 16 Bradford Road, Corsham can make a vital contribution to land supply. A site of this size and nature can provide the Council with significantly more certainty and clarity in terms of housing delivery and completion rates as opposed to larger sites which can often spend long periods of time within the planning process due to a wide variety of factors. The allocation of small sites in suitable locations around Towns such as Corsham will provide flexibility and certainty that required levels of growth are delivered in the plan period. Sites such as Site 6 Land to the north of 16 Bradford Road, Corsham are more readily available for development as, in this particular case, the site is within single ownership, will require less upfront infrastructure and can respond efficiently to various market demands. These factors allow the site to be easily delivered and make a definitive contribute towards the housing requirements of Corsham, the Chippenham HMA and Wiltshire as a whole. Some site options appear to align more closely with Corsham's place shaping priorities than others. Those sites located south of the settlement (Sites 2-5) are not thought to satisfy place shaping priorities i and iii (maintaining separate identities of settlements and Green Infrastructure protection).

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

SHELAA site 3250 has been assessed as amber for Traffic the Stage 2A assessment due to it being within 1,000m of a congested corridor. However, LVA are of the opinion that the small-scale nature of the site would have a minimal impact on the local traffic network.

CO6. Are there any issues or infrastructure requirements that should be identified?

No Comment

Further comments

We are of the view that the identification of greenfield sites to contribute towards the housing requirement of Corsham should be planned for entirely through the Local Plan Review.

Rep ID: Corsham37	
Consultee code: General Public	Consultee Organisation (if applicable): N/A
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>CO1 - Housing Figures</p> <p>Before I get into the details provided within your document, I must express my concerns generally about the figures for Wiltshire. Whilst I appreciate that this is, in the most part, an issue to be addressed at a Central Government level, as it is there that the methodology is determined.</p> <p>The housing targets are based on woefully out of date population and employment projections and the statistical analysis, as well as the starting data, needs to be completely reassessed.</p> <p>Where are the jobs and the people coming from to generate such housing demand in Wiltshire? Where is the infrastructure to support such an increase in housing numbers, when the needs of the existing population cannot be met, let alone the housing already permitted?</p> <p>Where does the destruction of our countryside end? Just because lots of people want to retire here does not mean that it should be facilitated. Soon the very rural character that these people crave will be gone and then where will we be? I completely</p>	

understand the need to provide affordable housing, but a different funding stream needs to be identified, which does not put us and our beautiful countryside at the mercy of volume house builders.

I understand that CPRE have started a campaign against the overestimation of housing need and the unnecessary destruction of greenfield land. I wholeheartedly support them and cannot emphasize enough the need for accurate information before more damage is done. Therefore, I must ask are these figures being challenged by Wiltshire Council, if not, why?

What is the impact of Brexit and the Covid-19 pandemic? If the latest census results and other more up to date information demonstrates that the population and employment projections are wrong, what happens to the land that has been prematurely allocated for housing? Is there a means by which this land is only released when it has been demonstrated that it is actually required, and the necessary infrastructure is in place?

Moving onto the specifics of this document. Obviously brownfield sites would be preferred, however, if these simply are not available to my mind the key must be to allocate as little greenfield land as possible and to prevent a cascade which will see the uncontrolled sprawl of the development boundaries and coalescence of both large and smaller villages with Corsham.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO2 – Priorities

i. The first “draft priorities” is not aligned with the Neighbourhood plan which makes specific reference to the harm that would be caused by the coalescence of Corsham with Neston, Gastard and Rudloe. Why is the potential impact on Gastard now not a consideration? The distinctive rural character of this edge of the town should be recognised as well as the social and visual damage that would be done by further connecting these settlements.

iii. It would be good to see where there is potential for enhancing and extending the town's Green Infrastructure before land is allocated for housing as it is clear that these two elements are likely to conflict. How can this be facilitated without additional house building?

iv. In addition to the A4 the issues on other roads throughout the town should be acknowledged. Parts of the road network simply cannot be improved without significant harm to either historic buildings or the natural environment and development should avoid putting pressure on those parts of the town which have a particularly poor or limited road network.

vi. The potential for a second supermarket is totally redundant. It is important to acknowledge that in the aftermath of The Pandemic a considerable amount of residents get their food delivered. This would cause further congestion in the town centre and would take shoppers away from the High Street, not to mention the fact that the wider area is swamped with supermarkets.

It is acknowledged that one potential site is identified in the Neighbourhood Plan, but I would like to politely suggest that recent events have superseded this.

Another priority should be ensuring that the shortfall in infrastructure catches up with the amount of housing already permitted before more housing development land is considered/released. With particular reference to GP provision.

In the light of Brexit the safeguarding agricultural land and restoration of the countryside should also be considered.

Out of interest would it not be helpful to have a review of the biodiversity gains and infrastructure delivered alongside the recent housing developments, and those that have been permitted, so that we can ensure the mistakes of the past are not repeated? If this piece of work has been done can it be made publicly accessible please?

CO3. Is this the right pool of potential development sites?

CO3/CO4/CO5 - Pool of Development Sites

The identification of development sites should be based on a clear and accurate understanding of the demand. From reading other documents it would appear that the demand is in accommodation for the elderly and affordable houses for families. With this in mind it would seem that what is required is an expansion of a facility such as Wadswick Green and small groups of houses spread throughout the town where there is good access to the transport network as well as facilities and services. This demographic would need to be confirmed, however, in the absence of any such information within this report I have several observations I would like to make:

Site 1 – Pickwick Paddock

This site is well located in terms of access to public transport, a good road network services and facilities. It is also not widely visible as the land is relatively flat with limited vantage points. It would appear to be approximately 500-600m walk to the town centre and an even shorter walk from the petrol station/convenience store. It is also close to the Porch GP surgery, Springfield Leisure Centre and Corsham Secondary School.

At a superficial level it would also appear to have limited environmental value although this should be explored in much greater depth. However, this is one site where I find myself questioning why only a very small plot is being considered. If there is a requirement for an additional 120 houses in Corsham why are the fields attached to this paddock not being considered?

Site 2 – Land South of Brook Drive

This plot is promoted on the basis that it could result in a stronger urban/rural settlement edge. I find this statement ridiculous as the same would have to be said of all development on the rural edge of the town. This is not a heavily built up urban area/edge and is actually an area where a new urban/rural edge is most definitely not required.

The Brook Drive/Broadmead Estate is low rise and low density, in addition it is located largely in a valley with a strong hedgerow containing many mature trees running along the edge of the existing development. This creates a strong visual boundary to the settlement and a soft skyline the result of which is a physically unambiguous and visually totally appropriate transition between a suburban estate and the wider open countryside.

In practical terms:

- The A3353 is a narrow road closely bound by historic buildings which cannot be widened or enhanced at key points.
- Encouraging any additional traffic on Ladbrook Lane would be dangerous and irresponsible.
- This site of the town is removed from the main road network and suffers from poor/irregular bus services.
- There is only one vehicular link with the town centre which is heavily congested at key parts of the day due to the location of the oversubscribed primary school.
- The closest convenience store is approximately 900 metres walking distance from this site. The town centre is approximately 1.5km from this site, the secondary school is almost 2km and the leisure and healthcare facilities over 2km from this site. For such a small town this is pretty much the furthest you can get from facilities and services with only one vehicular connection and one separate pedestrian link over the railway line. The alternative route would be Ladbrook Lane which is an extremely narrow lane with poor visibility and limited passing points. It is however, much used by walkers and cyclists.
- The public transport connections on this side of the town are to Melksham and Trowbridge with only 4 or 5 busses a day in either direction, as opposed to the half hourly service to Bath and Chippenham which ends at the Pound (approximately 1km from this site).
- The A3353 passes through Gastard where parked cars and a tight bend with 2 other connecting roads must be traversed, after which it is characterised by scattered housing and farm buildings adjacent to the road and long views of the open countryside. This is a largely visible site from many directions in short distance views from the surrounding roads and footpaths as well as longer views from the surrounding hills. Located behind a small group of modest historic (although not listed) cottages developing this site will have a far reaching visual impact, as well as continuing to close the gap between Corsham and Gastard.
- The poor road infrastructure here cannot easily be improved if at all without demolishing historic buildings and building another bridge or widening the bridge over the railway line. Consequently, to pursue any significant additional development on this side of the town must be very carefully considered and limited.

Site 3 – Land East of Lypiatt Road

The part of this site not within the “Rural Green Buffer” is closely related to a relatively high density part of the town which has a harsh skyline and could perhaps be improved by some more sensitive rural edge style development, to soften the long views of the three storey flats.

In comparison to Site 2:

- The field which lies outside the Green Buffer is approximately 350m walk from a convenience shop.
- In transport terms the same poor road connection over the railway line applies and it is only 100-200m closer to the town centre.
- The pedestrian links with the leisure centre, secondary school and GP surgery are slightly better due to the proximity of the railway footbridge that connects The Cleeve to Station Road.
- The Chippenham to Bath bus service also stops on Station Road which is approximately 400m walk from this site.
- Whilst the land within the Green Buffer is currently agricultural land it is traversed by multiple rights of way which make it part of the towns unacknowledged Green Infrastructure. Subject to an assessment of the agricultural value of this land converting these fields into informal recreational land and/or allocating areas for biodiversity enhancements could be of considerable benefit to the town as a whole.
- This site is not as well connected as those off of the A4, but if there is potential for a biodiversity and green infrastructure gain as well as a better visual aesthetic, the potential for some limited development should be explored.
- The presence of the Green Buffer will also prevent any coalescence of Corsham and Neston or Gastard.

Site 4 – Land West of Lypiatt Road

The site is in close proximity to Site 3 and would be subject to the same accessibility issues unless an access could also be provided to Potley Lane in order to reduce the pressure on the A3353 and the vehicular railway crossing. The same issues apply in terms of not seeking to significantly increase traffic on the A3353, but traffic here could be wider spread throughout the towns road network depending on the design specifics. There appears to be less potential for an improvement to the Green Infrastructure network, but there may be biodiversity enhancement potential. The visual impact of developing this land and reshaping the town is again an important consideration.

Site 5 – The Circus

Well connected to the transport network, in terms of main roads and bus services this site is however, slightly removed from the town centre facilities.

- It is within 500m walking distance of a convenience store and approximately 1km from the leisure centre, GP surgery and Secondary School.
- This site benefits from being closer to the Corsham Primary site which has potential to grow.

- This is however an important part of the local green infrastructure and a considerable amount of house are being built on this side of town without the provision of additional recreational space.

Visually modern housing development would not be out of place here, but the value of this land as a green space should not be underestimated.

Site 6 – Land to the North of 16 Bradford Road

Roughly 700m to the Petrol Station and Co-op convenience store, this site is also within 1km of the key services and facilities.

The development of this site would not reshape the town or have any wide reaching adverse visual impact as it has a very close relationship with high density modern housing. The scale of development which could be provided here is also considered more appropriate than on the larger sites.

CO4. What land do you think is the most appropriate upon which to build?

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

CO6 – Other Issues

The other issues that need greater consideration are the climate change agenda and reducing carbon emissions. Despite Wiltshire Councils Code for Sustainable Homes policy, I don't think I have seen a single house built which meets the minimum standard.

The desire for self-build and improving the quality of house building.

Healthcare provision has got to be made before many more houses are built.

We must obtain more accurate information and remove the hold volume house builders have on this country. The fact that the boom has passed needs to be widely acknowledged. The smaller household sizes have now been accommodated and what we are providing now should be based on an accurate an up to date assessment of the local population and its needs.

I have copied this email to the Town Council as I am hoping that they will be taking an active role in assessing housing need and the potential development sites etc.

Further comments

Rep ID: Corsham38	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Blue Fox Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Presscredit (Rudloe) Ltd	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: CORS38
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>In summary, our response covers the following matters:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Strong support for the WLPR identifying a “brownfield target” for the delivery of new homes on previously developed land; <input type="checkbox"/> The benefits of maximising the reuse of brownfield sites; <input type="checkbox"/> The need for the Plan to state clearly that the brownfield target is not an upper limit (that will not be exceeded) and that the Council will positively seek to exceed the identified figure when and where suitable brownfield sites present themselves; <input type="checkbox"/> Concern that, notwithstanding the “brownfield target”, the WLPR does not seek to identify specific sites and instead appears to abdicate such decisions to Neighbourhood Plans; <input type="checkbox"/> Concern as to the method adopted for allocating housing requirements to the rural settlements; <input type="checkbox"/> Allied to the previous points, concern that brownfield opportunities are being given less priority in the Rural settlements when compared with, for example, Principal Settlements and Market Towns; <input type="checkbox"/> The case for the redevelopment of the former RAF Rudloe Manor. 	

Brownfield Target

Paragraph 2.11 of the Emerging Strategy introduces the “brownfield target” which, as stated previously, is an approach we support in principle. The National Planning Policy Framework (NPPF) is clear that planning policies should set out a clear strategy for accommodating the need for new homes “in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.” (NPPF para 117).

NPPF paragraph 118 (c) further states that planning policies should:

“...give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.” (Our emphasis). NPPF paragraph 137 (a) also requires Local Planning Authorities to make “as much use as possible of suitable brownfield sites...”

Returning to paragraph 2.11 of the Emerging Spatial Strategy, this also states that:

“As land within main settlements is mostly built up, a requirement translates to a brownfield target. A target helps to maximise these opportunities and can reduce pressures to build on greenfield land.”

Whilst we completely agree with the fact that maximising brownfield development reduces pressure to release greenfield sites for development, we are concerned that the WLPR appears only to be considering opportunities at the main settlements. This theme is continued under “Development Principles” (page 6) which states:

“2. To maximise the use of previously developed land and support urban renewal where needed, each of the main settlements will have a target amount of new homes that will need to be planned for within its urban area.” (Our emphasis). As a consequence, it is only the “main settlements” that have a brownfield target as an indication of the number of new homes to be built on previously developed land. This focus only on the main settlements creates a situation whereby the Planning for Corsham WLPR document includes a brownfield target of 160 dwellings but the Empowering Rural Communities document, which covers Large Villages such as Rudloe, is silent on the matter of quantum to be achieved on previously developed land. On a related point, we note that the Empowering Rural Communities document does seek to identify an overall housing requirement for Rudloe. The document, at Table 2.4, states that the requirement for the period 2016 to 2036 is 250 dwellings which equates to an annualised figure of 12.5 dwellings per annum. It is important to note that this is the highest requirement outside of the main settlements in the entire HMA which supports Rudloe as a suitable location for development in its own right. However, the same table also suggests that as of 1 April 2019, there were completions and existing commitments also totalling 250 dwellings. Whilst the evidence behind this table does not appear to be readily available and therefore cannot be tested, the implication is that no additional development is required at Rudloe until after 2036. Given that these requirements are a minima, it is important that the Plan does not allow these figures to be used to stall additional development at the settlement.

Therefore, whilst we support the principle of maximising the redevelopment of brownfield sites, we object to the WLPRs apparent emphasis on the main settlements. This approach seemingly fails to appreciate the significant role that the redevelopment of brownfield sites

can also have in more rural, but still sustainable, locations.

In that regard, it is important to note the quotes from the NPPF set out above. The NPPF refers to “suitable” brownfield sites and therefore includes a far wider assessment than simply the designation given to a settlement. It is therefore clear that the WLPR should assess the suitability of brownfield land, including whether they are accessible and sustainable, on an individual site by site basis rather than concentrating only on the main settlements. This includes our client’s land at the former RAF Rudloe. We also have concerns as to the calculation of the brownfield target. This is first referenced at paragraph 3.9 of the Emerging Spatial Strategy but is dealt with in more detail in Appendix 1 of that document and it is to this that refer in our comments below. The calculation that has been undertaken is set out in paragraph 16 of Appendix 1. In summary:

□ The calculation has taken the average annual number of units granted permission from 2009-2019 on sites of up to 100 units for Principal Settlements, and up to 50 units for Market Towns.

□ A delivery rate (assessing permissions granted from 2008-2014 districtwide) has then been applied which takes into account non-implementation of permissions.

□ The output provides the anticipated average annual number of completions for each settlement which determines the brownfield target. Whilst we acknowledge that predicting delivery from brownfield sources is a complex matter and, indeed, may not be an exact science, we do have the following concerns as to this approach:

1. It is effectively a “one-size” fits all approach;
2. It relates only to Principal Settlements and Market Towns;
3. By virtue of (2) above, it fails to consider opportunities in lower tier settlements; and
4. It is not clear whether actual brownfield sites have been identified as part of informing the process.

Notwithstanding the above concerns, a central issue is how these targets will be considered as part of the process. It is in our opinion vital that the WLPR clarifies that the targets are just that and that they are not a cut-off point for further brownfield development on suitable sites.

We put this question to the Council during the recent online consultation webinars and received the answer that the Council would look to go over and above these targets (that is to say, maximise brownfield opportunities) and that the target would not be used as a limiter. We welcome this response and believe that the Plan would benefit from an explicit statement to this effect.

We note from the Site Selection Report for Corsham that, whilst the brownfield housing target is identified as 160 dwellings between 2021 to 2031, the options considered through the site selection process are all greenfield. This is despite the former RAF Rudloe Manor site being clearly visible on the maps supporting the document; please refer, for example, to “Figure 4: Final pool of potential sites for further detailed assessment.” This shows the proximity of our client’s site to Corsham and we would ask

that consideration be given to allocating this land which, in turn, may provide justification for not developing on some greenfield site(s).

This point is also linked to the final matter that we wish to raise which relates to how brownfield sites will be identified and assessed. Appendix 1 of the Emerging Spatial Strategy attempts to throw some light on this by stating at paragraph 18:

“The register of brownfield land is a starting point, as is the Council’s Strategic Housing and Employment Land Availability Assessment (SHELAA) evidence.”

Paragraph 19 further states:

“By engaging closely with their communities and by contacts with landowners and developers, neighbourhood planning is well placed to identify many opportunities and allocate them in their plans.” (Our emphasis)

Paragraph 22 then continues:

“Other large landowners, public or private, may also instigate redevelopment of their land.”

Whilst it is understood that these are all ways in which brownfield (and greenfield sites) can come forward, it is unclear as to why, in a plan lead system, the WLPR in its own right does not seek to identify brownfield sites. The apparent abdication of identifying and allocating brownfield sites to others could also be used to both undermine the WLPRs suggested prioritisation of such sites to avoid the unnecessary allocation of greenfield sites.

By way of example, if the Council is truly relying on Neighbourhood Plans to identify sites, what happens if such a Plan is not being prepared? For example, the Box Parish Neighbourhood Plan (which covers Rudloe) appears to have stalled at an early stage with the Steering Group not having met for over twelve months.

We therefore ask that future iterations of the WLPR seek to identify significant brownfield sites, both to ensure the Plan is positively prepared and to ensure its evidence base is robust.

Further, the testing of such sites through the Plan’s site selection process would also ensure that they were “suitable” in the terms of the NPPF. The former RAF Rudloe Manor is, in our opinion, a highly suitable candidate for allocation, although we also reserve the right to bring forward a planning application outside of the plan making process.

Conclusions

We welcome the opportunity to respond to the January 2021 consultation and, whilst we recognise that many of our comments above are critical, they are made with the intention of being constructive.

We support the Plan’s intention to maximise opportunities for residential development on brownfield sites and have suggested issues and matters that, if addressed, would in our opinion make the WLPR both more robust and positively prepared.

In summary, we suggest that the WLPR must:

1. Fully recognise that suitable brownfield opportunities exist in sustainable locations beyond the suggested Main Settlements and that these represent an important potential supply of new homes;

2. State clearly that the brownfield target is not an upper limit (that will not be exceeded) and that the Council will positively seek to exceed the identified figure when and where suitable brownfield sites present themselves;
 3. Adopt a more proactive approach to identifying those brownfield sites that are already known to be available and assess their suitability rather than leaving this to either Neighbourhood Plans or individual landowners. This includes land at the former RAF Rudloe Manor;
 4. Recognise the functional relationship of Rudloe and Corsham; and
 5. Recognise that the land at the former RAF Rudloe Manor represents a suitable and sustainable opportunity to deliver new homes on a brownfield site, in accordance with the Plan's emerging strategy, as well as delivering significant local benefits.
- Finally, we would welcome any opportunity to discuss these representations and the land at the former RAF Rudloe Manor with representatives of Wiltshire Council.

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

In summary, the functional relationship that exists between Rudloe and Corsham should be recognised.

CO3. Is this the right pool of potential development sites?

In summary, the Plan should have also considered known brownfield sites such as the former RAF Rudloe to potentially reduce the amount of greenfield land being considered.

CO4. What land do you think is the most appropriate upon which to build?

We request that the Plan also includes land at the former RAF Rudloe Manor.

On behalf of our clients, Presscredit (Rudloe) Limited (Presscredit), we are instructed to submit representations on the Wiltshire Local Plan Review (WLPR) consultation which commenced in January 2021. As will be explained in the representations, Presscredit control circa 13ha of land that once formed part of RAF Rudloe Manor and the comments set out below are made in the context of securing the redevelopment of this brownfield site for new homes.

Our response covers the following broad matters:

- Strong support for the WLPR identifying a “brownfield target” for the delivery of new homes on previously developed land;
- The benefits of maximising the reuse of brownfield sites;
- Concern that, notwithstanding the “brownfield target”, the WLPR does not seek to identify specific sites and instead appears to abdicate such decisions to Neighbourhood Plans;
- Concern as to the method adopted for allocating housing requirements to the rural settlements;
- Allied to the previous points, concern that brownfield opportunities are being given less priority in the rural settlements when compared with, for example, Principal Settlements and Market Towns; and The case for the redevelopment of the former RAF Rudloe Manor.

Land at the Former RAF Rudloe Manor

Appendix 1 of this correspondence shows our client’s land interests at the former RAF Rudloe Manor near Corsham. The plan also shows that our client is the freehold owner of the northern part of the site and has an option to purchase the remaining southern part of the site.

The site lies to the north of the A4 Bath Road and has good access to services and facilities in both Rudloe and nearby Corsham. Bus stops for the X31 service are located on the A4 close to the site entrance providing good public transport links to Bath, Box, Corsham and Hippenham. The recent Bellway Homes development, which was also previously in Ministry of Defence (MoD) use, also lies to the north of the A4 and is approximately 600m to the east of the RAF Rudloe site.

The site lies to the east of the Grade 2* Listed Rudloe Manor. Immediately on the western boundary of the site is a recent development of detached and semi-detached properties, planning permission for which was granted in July 2014.

The site is outside of the designated Green Belt but is within the Cotswolds Area of National Beauty. Despite operations having ceased by 2020, a substantial amount of the former MoD buildings and hardstanding remains as is also evident from the plan at Appendix 1. Since its closure, the site has unfortunately experienced trespassing and unsociable behaviour which has impacted on nearby homes thus requiring the presence of on-site security.

Our client has appointed a project team to assess the potential for development on this site as follows:

- Planning Consultants - Blue Fox Planning
- Landscape Consultants – The Environmental Design Partnership (EDP)
- Ecological Consultants – EDP
- Heritage Consultants – EDP

- Transport and Highways – Paul Basham Associates
- Master Planning and Architecture – Urban Design Box

As a consequence, we have a good understanding of the opportunities and constraints relevant to the redevelopment of this site and are confident that a high quality residential development can be delivered in the short and medium terms. Appendix 2 is a Constraints and Opportunities plan which has informed the preparation of an illustrative master plan (Appendix 3) which, whilst very much “work in progress”, demonstrates that, taking on board the constraints and opportunities, a development of approximately 140 new homes, together with open space, green infrastructure and community facilities could be delivered. We stress that this plan is purely illustrative at this time.

CO5. Are there important social, economic or environmental factors you think we’ve missed that need to be considered generally or in respect of individual sites?

The functional relationship between Corsham and Rudloe should be acknowledged.

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham39

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Savills (UK) Ltd

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): HarperCrewe Ltd

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:
CORS39

CO1. What do you think to the scale of growth? Should there be a brownfield target?

It is considered that the proportion of growth proposed for the Chippenham HMA is appropriate however, as identified in the comments associated with the Emerging Spatial Strategy the plan period should be extended to comply with the requirements of the NPPF to 2038 at least. On this basis the proportion of dwellings allocated to the Chippenham HMA and correspondingly Corsham should be increased in line with this. Working on the proportions identified in the Emerging Spatial Strategy this would result in an additional 80+ units being required in Corsham to meet the Local Housing Need identified for the extended plan period (based of the extension of the plan to 2038).

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

The priorities identified by the report are considered appropriate. It is considered that as well as improving road network capacity and safeguarding land for the re-opening of the train station improvements to the public transport options within the town through the expansion of existing services should be sought as a priority.

CO3. Is this the right pool of potential development sites?

No additional sites are proposed.

CO4. What land do you think is the most appropriate upon which to build?

Sites to the south of Corsham are identified as those proposed for allocation as part of this review. Whilst identified as the most appropriate sites these sites have a number of constraints which would limit development. Sites 3 and 4 in particular are identified as being allocated however, the large majority of the site areas are located in the Green Buffer. The sites are also considered to be more distantly located in relation to the key public transport routes.

Development of parts of the site identified as 475 and 2080 allows for a number of distinct benefits when compared to the sites south of Corsham. Whilst recognising the green rural buffer the development of part of these sites would provide a logical connection between the developments allowed (and wither constructed or under construction) to the north and south and would provide a contiguous and defined settlement boundary. The allocation of the site would enable parameters to be set to ensure that a separation is maintained between the settlements of Corsham and Rudloe which would be protected in the longer term. The remaining space could then be protected and managed to maintain the rural buffer and provide for enhanced green infrastructure in line with priority iii. for Corsham.

Sites 475 and 2080 are also closely located to major bus routes on Bradford Road which provides convenient access to public transport to both Chippenham and Bath (approx. 30 minute travel time to each) with a current frequency of every 30 minutes in peak hours (currently a reduced service due to lockdown restrictions). The sites identified to the south of the settlement are located approximately one kilometre from the nearest frequent bus service which would encourage the use of the private vehicle rather than sustainable methods of transport.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

As noted above, the allocation of site 475 and 2080 enables there to be control of the span of green buffer which shall be retained to prevent to coalescence of the settlements of Rudloe and Corsham. The retention of a green buffer will contribute to the protection of both settlements and will provide for biodiversity enhancements which will contribute to the environmental sustainability of the site.

Similarly the development of these sites will provide more ready access to the frequent public transport service which runs to the south of the site which will encourage the use of more sustainable forms of travel. These transport links provide not only routes on to Chippenham and Bath but also into the local town centre.

Development will provide a range of homes and affordable housing provision which will contribute to the meeting the needs of present and future generations providing a healthy and sustainable environment.

The provision of additional dwellings in Corsham will contribute to the vitality of the local area helping to support existing services and facilities.

CO6. Are there any issues or infrastructure requirements that should be identified?

None.

Further comments

Rep ID: Corsham40

Consultee code: Statutory Body

Consultee Organisation (if applicable): Natural England

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
CORS40

CO1. What do you think to the scale of growth? Should there be a brownfield target?

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO3. Is this the right pool of potential development sites?

Planning for Corsham

All sites at Corsham have potential to impact on Bath and Bradford on Avon Bat SAC, sites 5 and 6 are also in close proximity to the Box Mine SSSI which is linked to the Bat SAC. Further detailed assessment is required for these sites so as to ensure that adverse impacts on habitat features that are used by bat species linked to the Bat SAC are avoided. Natural England notes the SAs conclusion that high level of growth are likely to have a significant adverse effect on biodiversity.

Site 5 (SHELAA reference 3034) This site extends beyond the built environment into priority habitat that is nestled between Corsham Railway Cutting SSSI and Box Mine SSSI a component SSSI of the International Bath and Bradford on Avon Bat SAC. This site also encroaches on the Cotswolds AONB and in the absence of LVIA and based on the information provided Natural England does not support this site.

CO4. What land do you think is the most appropriate upon which to build?

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham41	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Historic England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: CORS41
CO1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by Conservation Area Appraisals, which appear to be absent.</p>	
CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

Conservation Area Appraisals and Management Plans and or a Heritage Topic Paper for the town can help inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).
Have the Corsham Conservation Statement and 2015 Public Realm Study informed priorities?

CO3. Is this the right pool of potential development sites?

The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within and around the town.
Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Corsham due to Wiltshire Council's intention to provide further evidence. We therefore reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.

CO4. What land do you think is the most appropriate upon which to build?

An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful.
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
Up to date Conservation Appraisals and setting assessment, where appropriate, can help inform the Plan.
It would be helpful to appreciate the judgements of the Council's in-house heritage and landscape expertise, and any germane planning history.
It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for Corsham is recommended; and a strategic landscape setting assessment and up to date Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities. Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: Corsham42

Consultee code: Other

Consultee Organisation (if applicable): Railfuture

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
CORS42

CO1. What do you think to the scale of growth? Should there be a brownfield target?

CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

CO3. Is this the right pool of potential development sites?

Planning for Corsham

We welcome the intention (para. 22, item v) to safeguard land for reopening of a railway station. A station would almost certainly be viable, not only because of its position on a main line to Bath, Bristol, Chippenham and Swindon but because Corsham is now a significant centre of employment itself, notably at the Science Park. A Bristol- Oxford service could call at this station and at Royal Wootton Bassett.

CO4. What land do you think is the most appropriate upon which to build?

CO5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

CO6. Are there any issues or infrastructure requirements that should be identified?

Further comments