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Dear Ann,

**Corsham Neighbourhood Plan Examination
Corsham Town Council and Wiltshire Council response to questions of
clarification from the Independent Examiner**

Please find below a joint response from Corsham Town Council and Wiltshire Council to your questions for clarification, received on 24 June 2019. A separate document contains the various maps and documents referred to in our responses below.

1. Please would WC confirm the status of the Community Area Framework June 2016.

The Corsham Community Area Framework was commissioned by Wiltshire Council and involved stakeholder consultation with Corsham Town Council, local landowners (including the MoD), businesses and other local community groups. The Framework was completed in June 2016 but was not adopted by Wiltshire Council as a supplementary planning document because it had a wider remit than solely land use policy. The Framework does not therefore have formal planning status. As stated in the Framework it was prepared to develop a holistic framework for the town's sustainable growth and provide evidence to the neighbourhood plan and other local initiatives. A significant amount of evidence gathering and stakeholder involvement took place to inform the plans and proposals within the Framework.

2. Policy CNP E4 refers to green spaces identified on Figure 6. A number of queries arise:

a. Figure 6 is a diagram of areas important for green infrastructure. The policy would allow these areas to be lost, but this seems to be in direct conflict with the principles of green infrastructure and the areas identified and scored by WC on this figure. How might this issue be remedied?

Core Policy 52 of the Wiltshire Core Strategy states "If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required."

It is considered that policy CNP E4 is broadly consistent with Core Policy 52 in this respect, with the exception of the last part of the final sentence which may allow for the

loss of GI in exchange for “significant social, economic or environmental benefits from an alternative facility.” It was not the intention of the policy to allow for benefits that may not provide, as a minimum, like for like benefits. It is therefore proposed that Policy CNP E4 be amended as follows:

“Policy CNP E4—Development that results in the loss of green spaces identified on Figure 6 (on page 28) or that results in any harm to their character, setting, accessibility, appearance, general quality or amenity value would only be permitted if, **as a minimum**, the community would gain equivalent benefit from the provision of suitable replacement green **infrastructure** space or gain significant social, economic or environmental benefits from an alternative facility.”

b. Should Policy E4 apply to the areas referred to in paragraph 36 of the Plan instead? If so, these areas should all be shown clearly on a map please.

No. The list in paragraph 36 is not exhaustive. The areas mentioned came out of early community consultation in the form of a questionnaire and were in response to the question - Are there any sites which you think should be protected from development? Further details on the questionnaire are available in the Community Consultation Statement (from page 19).

c. It is very difficult to identify any individual areas because of the scale of the map on Figure 6. However, given my concern above, it is not at this stage necessary to provide larger scale maps.

Noted.

d. Figure 6 seems to score areas based on their value for green infrastructure; is this correct and if so, why does this information need to be included in the Plan?

Yes. This interpretation of the Green Infrastructure network uses two characteristics: existing value to recreation and existing value to biodiversity, as according to pre-defined assets. Ground-truthing and linking the existing GI assets would result in defining opportunities to improve the connectivity of the GI network. There are many areas of Corsham that would qualify as “green infrastructure” assets, but the map shows only those assets which already exist in the GIS resources below.

The GI network map shows only existing Green Infrastructure assets. They are taken from one of the following existing GIS map layers-

- Open Spaces Audit (July 2015)
- Priority Habitats
- Designated nature conservation sites (SSSI, SAC, SPA, LNR, CWS)
- Protected road verges (“PR Verges”)
- Ancient woodland
- WC Countryside Sites
- Wiltshire Wildlife Trust Sites
- Open Access Land
- Rights of Way
- Sustrans – National Cycle Network
- Woodland Inventory (Forestry Commission)

- Rivers and Streams (Environment Agency)

The relative value of the GI assets has been determined by scoring each for its recreation and biodiversity value and taking an average. The higher the score, the relatively more valuable that asset is to the GI network.

The information is included so that the Plan can afford them some protection or at least not allow a net loss of these sites. It also prioritises the sites which would benefit from improvement.

3. Policy CNP E5 refers to a Green Buffer.

a. Please point me in the direction of the evidence for the areas which have been identified.

The concept of a Green Buffer originated as a Town Council policy (see Annex 1, attached), out of a desire to protect green space between the town and villages. This was later taken forward and supported by further evidence used to inform the Corsham Area Framework. This was then refined and supplemented by more detailed work on the Corsham Batscape Strategy and through community consultation on the neighbourhood plan. References include:

Community Consultation Statement

- Main Issues Raised by First Round of Community Consultations (page 16);
- Environment Workshop P29 preserving gaps/green spaces between settlements and identifying and protecting ecologically sensitive sites and wildlife habitats, enhancing biodiversity – more nature areas and green networks.

Corsham Area Framework

- Framework Principles Page 18 – Protect against the coalescence of individual settlements by defining appropriate limits for development.
- Page 25 Protect the integrity of the villages.
- Page 26 map – relatively undeveloped land.
- Page 27 map – Preserve green setting and character to settlements.
- Page 61 map - existing green infrastructure corridor.
- Page 64 ‘...help to protect the green space that separates West Corsham from the town, preserving the existing character and setting and allowing development to respond to existing landscape and ecology constraints’.

The Framework can be accessed here - <http://www.wiltshire.gov.uk/corsham-area-framework.pdf>.

Also planning applications had highlighted the fact that there are rare species of bats in our area. The cumulative effect of developments had not been fully considered. It was decided that this needed further exploration to collate the available data in order to better protect the areas they use. This evolved into Part 3 of the Corsham Neighbourhood Plan - Corsham Batscape Strategy. The Batscape Strategy stresses the importance of connective habitat P7: “bat populations associated with this designated site {Bradford on Avon Bats’ Special Area of Conservation} are reliant on the landscape within the

Neighbourhood Plan Area for foraging and commuting between roosts.” The original area proposed for the green buffer was much larger and was refined to exclude areas that were not closely associated with an existing settlement. There were also some sites which we would have liked to include in the green buffer which we could not as they had already received Planning Permission.

b. Please provide me with a map at a larger scale showing the proposed Green Buffer and the land referred to by the MOD in their representation so I can see where the two areas overlap.

Please see attached map at Annex 2 - Green Buffer with MoD Land.

c. Please provide me with a map at a larger scale showing the proposed Green Buffer and the land referred to by De Vernon Trustees in their representation so I can see where the areas overlap.

Please see attached map at Annex 3 - Green Buffer with De Vernon Trustees land

d. Please update me in relation to any planning permissions affecting the proposed Green Buffer granted since the submission of the Plan indicating any areas on a map so I can see where the land is in relation to the Green Buffer.

Of the five planning applications received within the proposed Green Buffer since the submission of the plan, three have been permitted. Details have been provided in the table below (See also attached map at Annex 4).

Application ref	Proposal	Date registered	Status	Decision date	Decision
19/00208/FUL	Extensions to both ends of property to increase living area	11/02/2019	Decided	14/06/2019	Approve with conditions
18/10224/FUL	Proposed single storey rear extensions	30/10/2018	Decided	13/12/2018	Approved with conditions
18/01174/FUL	Erection of Hartley botanic 'victorian villa' greenhouse	05/02/2018	Decided	28/03/2018	Approved with conditions

e. WC representation indicates that the role of the Corsham Area Framework in proposing the Green Buffer should be explained. Please explain this and provide text suitable for inclusion in the Plan if appropriate.

The concept of a Green Buffer originated as a Town Council policy (see attached), out of a desire to protect green space between the town and villages. This was later taken

forward and supported by further evidence used to inform the Corsham Area Framework. This was then refined and supplemented by more detailed work on the Corsham Batscape Strategy and through community consultation on the neighbourhood plan. Please see response to question 3 a) for further explanation.

Suggest inserting the text below into the CNP Part 1 to the left of the green buffer map on page 24

“The concept of a Green Buffer came out of a desire to protect green space, preserve important gaps/green spaces between settlements and identifying and protecting ecologically sensitive sites and wildlife habitats, enhancing biodiversity through more nature areas and green networks. The Corsham Area Framework contributed by highlighting areas of relatively undeveloped land which would protect against the coalescence of individual settlements and protect the integrity of the villages, preserving the green setting and character of settlements. The area included in the Green Buffer has been refined to exclude areas that were not closely associated with an existing settlement.”

- 4. Policy CNP HW4 refers to community green spaces identified in Figure 6. These are not readily identifiable on Figure 6 – as I have already mentioned, the scale of Figure 6 makes it hard to see individual areas. Please provide a larger scale map which shows the green spaces intended to be the subject of Policy CNP HW4.**

Please see attached maps at Annex 5. We would also suggest that the map could be included as appendices to the Plan as a series of maps for ease of use (also attached).

- 5. What is the Creative Corsham Strategy? Please provide me with a copy of this or a link to it.**

“The overall mission of the Creative Corsham Strategy is to champion and support the role of culture in Corsham and to focus partners, resources and energy upon the delivery of an Action Plan. It will also enable Corsham Town Council to work with partners and the community to create positive and lasting change.” Please note that whilst the Corsham Creative Strategy was adopted in 2016 the title is Creative Corsham Strategy 2017-2022. The Strategy is available on the link below and is also attached for your convenience.

<https://www.dropbox.com/s/jm4umx9k5ws9pdt/CTC%20Creative%20Corsham%20Strategy%20FINALV1.pdf?dl=0>

- 6. Is there any other supporting information on the key views referred to in Policy CNP HE3 and shown on Figures 13 and 14? Please confirm the accuracy of Figures 13 and 14; at my visit View 10 on Figure 13 did not seem correct and View 21 on Figure 24 seems to be outside of the Plan area.**

The important views were identified through the Character Assessment process. Regarding views 10 - Extract from P131 – Design Guide – “Views (external and internal) • Areas near Springfield Recreation Ground and the stream valley enjoy views of open greenspace, and glimpses of the countryside above housing are possible from some elevated positions, including Springfield Recreation Ground and Hitherspring; from most other areas views are mostly dominated by houses.”

We do accept that the arrows for view 10 are incorrect and propose to reduce to one arrow and make it much shorter as on the attached map (Annex 6 Vol 1 – Figure 13 – Corsham Key Views)

Regarding view 21 - Extract from P157 – Design Guide – “Views (external and internal) • Generally views exist of countryside/park landscape though, there are very few long-reaching views due to tree cover and gentle slopes.”

We agree that the arrow for view 21 has been incorrectly plotted and propose to move it as per the attached map. (Annex 7 CNP - Vol 1 – Figure 14 – Corsham Key Views)

7. Is the information in paragraph 51 of the Plan still up to date? If not, what should it be now please?

The practice guidance referenced in paragraph 51 has not been updated since the submission of the Corsham Neighbourhood Plan. However, the specific paragraph reference should read Reference ID: 18a-007-20140306.

8. I would like to invite the Town Council to briefly comment on the points made by Savills in relation to the Design Guide. Should it be revised in the way suggested?

The general response to comments on the Design Guide submitted at the Regulation 14 stage is summarised in the submitted Community Consultation Statement at paragraph 17 on page 44 and resultant changes to the Design Guide are listed in the following table.

Savills made similar representations to the Regulation 14 Consultation (Comment ID 71). For information this is attached at Annex 8 including the response provided by the Neighbourhood Plan Steering Group at that time.

Our position on this matter is unchanged and the Design Guide should not be amended.

9. Please provide a copy of Natural England’s response to the Habitats Regulations Assessment of January 2019.

Please see attached at Annex 9.

10. It is my present intention to insert an overarching policy referring to the Design Guide and Batscape Strategy into Part 1 of the Plan. Would the Town Council with WC like to suggest wording for such a policy for my consideration?

Corsham Town Council and Wiltshire Council would welcome an overarching policy which would bring together the requirements relating to the Design Guide and Batscape Strategy, set out within various policies throughout the neighbourhood plan, into one place. We would like to suggest that the following supporting text and policy wording be used:

“The Corsham Neighbourhood Plan has been led by local evidence and extensive community involvement. As a result, the protection of the natural and historic built environment lie at the heart of the plan’s vision and objectives, which reflect:

1. The international importance of the Bath and Bradford on Avon Bats Special Area of Conservation; and
2. The locally distinct characteristics that are highly valued by the local community to maintain a sense of place and identity for the area.

One of the key concerns of the local community is that these important features and assets could be eroded by the impact of incremental development. This is particularly the case for the bat population, which is highly sensitive to changes to the local environment, including features of existing buildings and their surrounds. In recognition of the importance of these issues the neighbourhood plan is presented in three parts, with parts two and three comprising a Design Guide and a Batscape Strategy. These documents compliment and support each other and should be fully taken into account by applicants and decision makers, in accordance with Policy CNP – XX.

Policy CNP- XX

Proposals for development within the Corsham Neighbourhood Plan Area will be supported provided they are fully in accordance with the Corsham Design Guide (Part 2) and Corsham Batscape Strategy (Part 3).

Applicants must demonstrate how their proposals will:

i.adhere to the principles and requirements of the Corsham Batscape Strategy to ensure that their development preserves and, where possible, enhances landscape permeability and connective habitats within the Corsham area (including details of measures to preserve and, where possible, enhance wildlife corridors, especially with regard to foraging areas, priority flight lines and maternity roosts); and

ii.be of high-quality design, reflecting the distinctive character and features of the local area (design, scale, materials, colours and proportion respect the prevailing historic context) identified in the Corsham Design Guide and, where possible, result in improvements to existing features that are considered to be detractors.”

We trust that this letter provides sufficient information to inform your report on the examination of the Corsham Neighbourhood Plan. If you have any further questions or points of clarification, please do not hesitate to ask.

Yours sincerely

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