Development proposed for ‘Rowden Country Park’

The plans for the development of Rowden Country Park are flawed, inconsistent and incomplete. They are based on out of date and unresearched, unsubstantiated information. Therefore the development proposal should be rejected.

Paragraph 8.8 ‘Assessment of Cumulative Effects’ of document entitled Rowden Park Environmental Statement states that the assessments undertaken to determine environmental effects during the construction and operational phase of the proposed development, have taken into consideration effects of the committed and potential developments at Hunters Moon, North Chippenham, Rawlings Green, and Showell Farm, but fails to consider the recent (now complete) development at Coppice Close (45 houses) and, more importantly the approved developments currently under construction on Rowden Lane itself, totalling close to 100 houses. The aerial photographs used for the assessment are from 2008 and do not even show Coppice Close itself which was built in 2009.

1.0 Traffic Congestion

The traffic congestion survey data is taken from March and April 2008. Figures 8.8 and 8.9 detailing observed queues in AM peak hour appear to be dated 18/03/08 and 03/04/08. Such data cannot give a realistic, up to date representation of traffic flows through and around Chippenham today. Hence, the statement given in paragraph 8.8.2 of the aforementioned document, which states that “All identified effects, as outlined in Sections 8.6 and 8.7, have taken account of the committed development [and that] baseline traffic flows for the assessment year includes these developments and no further cumulative effects have been identified” is discredited.

Paragraph 8.7.14 states that ‘L1 (Patterdown Road, between A4 and Coppice Close) is expected to be subject to traffic flow increases of 27% in the AM peak hour and
36% in the PM peak hour. However, due to the lack of sensitive receptors on this link, this is not considered to constitute a significant effect.” This does not align with the forecast queue of one vehicle at peak times, and it ignores the inconvenience caused to those residents on Rowden Lane.

Paragraph 8.1 states that “No significant adverse effects have been identified for either the construction or operational phase of the proposed development,” yet again in its forecast of the flow of traffic onto Patterdown it only considers the impact of the 145 new homes in the North development and ignores the additional 100 or so new homes currently under construction as well as those already using Rowden Lane to exit onto the A4. Assuming access from Rowden Lane itself onto the A4 is removed (as currently being considered) this would mean ~300 houses accessing through Coppice Close onto Patterdown. The predicted queue at peak times of just one vehicle emerging onto Patterdown seems wildly optimistic. Besides, even if this were to materialise, then the bottleneck at the roundabout onto the A4 would only worsen and would hardly be eased by traffic lights owing to the proximity of other lights within 200 yards on the A4 at B&Q.

There is a caravan park situated along Rowden Lane. In the plans for the Redcliffe development currently underway on Rowden Lane it is proposed that access to the A4 will cease and all vehicles will need to access via Coppice Close. It is not clear how caravans will negotiate the chicane in Coppice Close, especially with residents’ cars parked on both sides of the road. The problem may be worse for emergency vehicle access through Coppice Close. Access should remain directly onto the A4. Indeed, it is written in the deeds of the properties in Rowden Hamlet that they enjoy access onto the Bath Road via Rowden Lane.

No consideration is given to the further potential impact of the Range proposal on traffic congestion in the area.

The inclusion of cycle paths in the scheme will hardly affect traffic congestion brought about by the combination of developments when viewed in the round.

2.0 Flood Risk

Although the development proposal does not propose building directly in the flood plain, no consideration has been given to the impact of reduced soak-away land on those properties close to the edge of the flood plain and their increased potential to flood.

3.0 Conservation of Agricultural Capacity

According to Sarah Foster’s statement of community engagement document, farmland on which the development is proposed is in ‘active agricultural use’. Paragraph 9.4 of the environmental survey says that “There is no mitigation available for the direct loss of agricultural land although part of the site would be given over the Riverside Park, Openspace, allotments and landscaping which would retain the existing soil resources interest so that it can meet future needs to support ecosystems, landscape, agricultural and cultural factors.” This statement seems in conflict with itself unless one were to infer that allotments were in lieu of prime
agricultural land. Paragraph 9.7 is more direct, “The loss of agricultural land is an inevitable consequence of the amount of development that Chippenham is expected to accommodate if that need is to be met.”

4.0 Employment

Paragraph 3.12.14 of the aforementioned document states that, “Using economic generation rates of 1.2 employed persons per households, the housing from the proposals (all proposals across town) would generate a requirement of 2,640 jobs. However, it should be recognised that a proportion of residents will be moving from within the Borough, thus retaining their existing job.” It is all very well recognising the proportion who will be moving within the Borough, but this does beg the question as to those who will be moving into the houses vacated by those moving to the new development – surely they will need jobs too? This invalidates the qualifying claim made in paragraph 3.12.14.

Paragraph 3.12.16 says, “In the absence of detailed net internal areas per employment use, table 4.13 above, identifies the proposals would generate in the region of 1,075 to 10,750 jobs [a 900% margin of error?!]. This provision is more than adequate to support the estimated 2,640 job seekers as identified in paragraph 3.63.” Which businesses will be moving to the Chippenham area? There are commercial premises available locally which have failed to attract tenants since they were built, such as those at Methuen Park.

5.0 Rowden Lane and Rowden Hamlet Specific Concerns

That part of Rowden Lane to the east of the first cattle grid is private property. Maintenance costs are shared between the owner of the agricultural land and the residents of Rowden Hamlet. The proposed development will inevitably attract more visitors and, since it is proposed that this part of Rowden Lane be crossed by cycle paths, will attract more cyclists. How is it proposed that maintenance costs be addressed in future?

With greater visitor numbers, where is it proposed that these visitors and dog walkers will park their cars?

According to Table 4.1, page 24, of the document entitled ‘Plans-Rowden Park Environmental Survey Non-technical Summary’, it is proposed that thorny hedges will be planted to the south side of Rowden Hamlet to minimise the loss of privacy, yet no provision is made in the proposals for the maintenance of said hedges. Clearly, access will need to be retained to enable householders to maintain their existing fences.

5.1 Proposed ‘Interpretation Strategy’

Paragraph 7.9.2 of the document entitled ‘Plans-Rowden Park Environmental Survey Non-technical Summary’ says that “Implementation of the suggested mitigation measures would help to increase public appreciation of the archaeological resource, which at present is not publicized. As the Rowden Farm complex includes a scheduled monument of the Highest significance, the
proposed interpretation strategy would be assessed as of medium beneficial value and thus would have a residual effect of moderate-substantial enhancement.” This is a major concern; Rowden Manor and the whole of Rowden Hamlet is private property, as is the lane leading to it from the lower cattle grid on Rowden Lane. Any placards serving the ‘interpretation strategy’ placed in the vicinity will only lead to trespass by unwelcome visitors.

Paragraph 7.2 from the same document states that “Appropriate mitigation measures however include enhancements of the historic bridge and the ability for public appreciation of the Civil War battlefield. These means would use a bronze 3-D model (subject to discussion) of the battlefield and discrete interpretation panels to explain the cultural heritage of Rowden Park and would compensate for the low level of indirect harm that would otherwise accrue to the designated heritage assets. When implemented these mitigation measures would result in a residential enhancement of current understanding and appreciation of the cultural heritage of the Rowden Park Conservation Area”. This reinforces our concerns regarding trespassers and unwanted visitors seeking to view the historic buildings. We object to any information being displayed which might attract visitors to our private property/land.

5.2 Visual Impacts
According to paragraph 5.11 of the ‘Plans-Rowden Park Environmental Survey Non-technical Summary’ and paragraph 4.6.11 of the Rowden Park Environmental Statement, “There will be visual impacts in the short and long-term from Viewpoint 2, where it crosses the site. Viewpoints at Showell Nursery and Rowden Manor will incur short-term visual impacts as a result of construction, but these will not be significant in the long-term.” However, no viewpoint is shown at the Rowden Hamlet, so it is not possible to assess this impact.

5.3 Cycle Paths and Light Pollution

Pages 37-38 of the ‘Design & access statement’ show two cycle paths crossing Rowden Lane, one following the line of the existing pedestrian footpath in the direction of Reybridge. This passes directly behind Fairfax House and Rowden Manor.

The Lighting strategy document says, “Most of the proposed Riverside Park will be unlit, with exception of potential frequently used foot and cycle paths crossing the Site.” We would be most displeased if the above mentioned footpath were to be converted to a cycle path and lit at night. The resultant increased light pollution would be most unwelcome.

6.0 GP Surgeries

According to the environmental survey document, it appears that the increased number of patients attracted by the development has been distributed across the total number of GPs in the area. The number of GPs has been taken from the NHS choices website, which does not take into account the full time / part time status of those GPs. For Lodge Surgery, for instance, this is 8,260 patients managed by five
doctors. However, three of these are part time, making a total of less than four full-time equivalents. It is assumed that similar errors have been made for Rowden and Hathaway surgeries. Paragraph 3.12.11 states that Lodge Surgery has capacity for a further 800 patients if its patient / doctor ratio were brought to the same level as that for Rowden surgery. This completely ignores the fact that the Rowden Country Park development is outside the catchment area of Lodge Surgery as is documented on its website. Lodge Surgery, at least, has not been consulted on any of these issues.

7.0 Schools
The environmental survey document estimates an increase in pupil numbers from the whole of the Rowden Country Park development to be 210, and for all developments, 462 (including those from this site). However, the only school with space is Abbeyfield, so children will need to travel there. This will contribute to peak hour traffic congestion. The topic of additional places is referred for ‘Section 106 agreement’.

Yours faithfully,

Sent by e-mail

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