Dear Ms Burkey,

thank you for your advice and I would respond to your points below by suggesting you read my letter of 4th September together with other objections. The objections refer to a lack of valid information from the applicant that should direct you to withhold the consent that you are minded to grant until sufficient details are presented. The heritage and ecological statements are too loosely made and I believe they still require to be questioned and assessed by your advisors. There seems to be serious omissions as well as flawed baselines for presenting some of the applicant's evidence for compliance with accepted codes and principles. For one example - the site is within a flood plain and several of the fields are under standing water at some point in winter - every year. This is incompatible with the proposals.

To process this application on the basis of conditions and without more rigorous enquiry is ignoring the probability that the sum of the deficiencies should - at this stage - preclude consent.

I would also refer you to the planning report from Wilts Council for the West Cepen Way site (14/11556/FUL) that recommends refusal at the committee meeting on the 14th September. I argue that here are commonalities with the Rowden Park site in that they both have heritage, ecology and environmental determining factors. However there appears to be some evidence of double standards being unfairly applied in the favour of Rowden Park. Wiltshire Council appears to be taking a more robust stance for the West Cepen Way site on the same important issues whereas the Rowden Park applicant has been allowed to leave fundamental questions unsatisfactorily answered and many of the important pre-planning decisions are to be postponed and dealt with by conditions. This does not appear to be an appropriate method of procedure and one that may prove unsustainable if subjected to a judicial review. I understand that the applications are for different use classes but I would appreciate your comments on the perceived difference in scrutiny.

To return to the details below:
1. I will try to speak with John Freegard about the lighting scheme. Rowden Conservation Area should be classified under the ILP guidance as Zone E1, not E2. Zone E1 is recommended for naturally dark areas such as the existing site. Zone E2 would be perhaps appropriate for the specific areas of new houses only, and not the open spaces. Additionally a curfew time period should be applied as a condition.
2. I will call the EA as suggested.
3. I have now seen a reference on air quality but I believe it refers to sampling at a later stage - this should be a pre-requisite for the outline planning application on this sensitive site.
4. The Energy Statement was rejected by your officer who at the time asked for a resubmission, not the application of a condition. There is no resubmission for this on your website.
5. The reports for the Environmental Statement acknowledge that there will be increased risk of flooding in the locality of the development and so far there are areas of non-compliance with EA requirements for building within a flood plain. Flooding is a major concern for the Rowden Lane residents as well as others downstream and we feel that this matter calls for some more information and better explanation of the impact before any conditions are proposed. We are unhappy with a 'leave it and sort it out later' condition when the full implication of surface water drainage is likely to inform a different masterplan and site layout.
6. The application notice may state 1000 units but the ES and other documents indicate the additional infill sites that have been variously studied for cumulative impact. One glaring omission from the applicant's cumulative assessment is the adjacent employment site that is owned by the applicant. This has links to the
traffic, environmental and heritage issues for Rowden Park yet appears to be absent from the cumulative studies and detailed drawings. For example, is it not intended to have traffic flow through the employment site on to the main residential roundabout? There are other cumulative considerations that should be made here.
7. The details for drainage attenuation are understood to be subject to condition but surely the basic principles and ecological assessments should form part of the outline application. There seems to be insufficient information supplied and an inadequate assessment of what is required to demonstrate credibility.

There are more questions than answers at this stage in my search through the application documents and I do hope that you will be able to take all of these comments into consideration and provide appropriate responses.

Regards,

Maurice Evans
Chartered Architect
A: The Tythe Barn, Rowden Lane, Chippenham, Wiltshire SN15 2NN
M: 07785 521016
E: mfelive@hotmail.co.uk

From: Burkey, Charmian
Sent: Monday, September 05, 2016 1:10 PM
To: Maurice Evans
Subject: RE: Rowden Country Park - 14/12118/OUT - environmental information

Dear Mr Evans

1. I have spoken to John Freegard (EHO) who states that any lighting scheme will need to comply with Zone E2 of the Institute of Lighting Practitioners’ Guidance.
2. Ellie Challans Direct dial 01258 483321.
3. Air quality is dealt with by Steve Manning and he has been consulted.
4. The original Energy Statement was indeed criticised in part, but the concerns can be addressed by way of a planning condition.
5. I cannot see reference to a drainage maintenance scheme in the EA response, but all their requirements are either in pre-commencement conditions or informatives.
6. The application is still for up to 1000 dwellings..the additional 400 are for proposed sites.
7. The drainage attenuation will be for a detailed submission.

I hope that this helps

Charmian Burkey
Senior Planning Officer
Economic Development and Planning, North Hub
01249 706667
Works Mon-Weds (incl.) 9-4.30 and Thurs WFH

From: Maurice Evans [mailto:mfelive@hotmail.co.uk]
Sent: 01 September 2016 15:19
To: Burkey, Charmian
Subject: Re: Rowden Country Park - 14/12118/OUT - environmental information

Dear Ms Burkey,

thanks for prompt reply but I have more questions for you.
1. Lighting - Mark Wiltshire says he does not deal with issues of light pollution and sensitivity and directed me to you for Environmental specialist input - please advise who to contact;
2. do you have a specific contact with Environ agency for this application?
3. the Atkins sustainability report advises that noise, air quality and lighting pollution will have an impact on the CA and should be considered. Does John Freegard also deal with air quality for Wilts?
4. the original energy statement was rejected by Wilts council and more detail requested - I cannot find any update on this.
5. I have just got down to the Wessex Water and EA reports on your website - they seem generally supportive and request that conditions are applied. The EA notes that a drainage maintenance scheme must be set out in the outline application concern - would you please direct me to this?
The Wilts Drainage comments are for the previous application for fewer units and should be updated - as well as acknowledging that it is down to Wilts Council to check and advise the EA on drainage capacities and outflow to Pudding Brook and the Avon. The applicant should be asked for this information at this stage in order to prove viability of the 1400 unit scheme. 

Another issue is that the applicant shows drainage attenuation areas within a flood risk area - this is not acceptable to the EA. Finally, the EA notes one omission from the application - an Environmental Management Plan - that will require close scrutiny when available. This reflects on the heritage issue of farm land versus country park and I will write separately on this.

Regards,

Maurice Evans
Chartered Architect
A: The Tythe Barn, Rowden Lane, Chippenham, Wiltshire SN15 2NN
M: 07785 521016
E: mfelive@hotmail.co.uk

From: Burkey, Charmian
Sent: Thursday, September 01, 2016 2:25 PM
To: Maurice Evans
Subject: RE: Rowden Country Park - 14/12118/OUT - environmental information

Dear Mr Evans

Almost all this information is available on line I think under the multitude of documents submitted with the application, but :

1. The detail soft eh lighting will be dealt with at the reserved matters stage, but Mark Wiltshire is the point of contact initially.
2. There are a number of documents relating to flood mitigation but the Environment Agency may be better placed to answer.
3. There are a number of noise related documents, although I do not think that anything was carried out specifically in the CA as it is not directly affected by the development. John Freegard dealt with the noise related issues with the application.
4. The energy statement is available on line as part of the original submissions.
5. The responses from Drainage and Wessex Water are available on line now although the precise detail will be part of the reserved matters application.

I hope that this is of some help.

Charmian Burkey
Senior Planning Officer
Economic Development and Planning, North Hub
01249 706667
Works Mon-Weds (incl.) 9-4.30 and Thurs WFH
Dear Ms Burkey,

I am looking for information concerning:
1. the proposed street, footpath and other lighting for the development that will have an impact on the CA.
2. the flood mitigation proposals concerning volumes to be stored on site and volumes to be directly piped into the Avon.
3. background noise assessments of existing CA and proposed overall development for impact assessment.
4. the Energy Strategy for the development.
5. details of how the foul drainage will be routed and what measures may be taken to cope with this at the sewage plant across the river.

There will probably be other questions arising on environmental issues that I have not been able to find in the revised ES or consultee reports. Also there appears to be a lack of supportive information within the ES concerning the lighting levels in general.

Regards,

Maurice Evans
Chartered Architect
A: The Tythe Barn, Rowden Lane, Chippenham, Wiltshire SN15 2NN
T: 01249 709219
M: 07785 521016
E: mfelive@hotmail.co.uk

Good morning

When you say “technical details on environmental matters”...can you be more specific?

Charmian Burkey
Senior Planning Officer
Economic Development and Planning, North Hub
01249 706667
Works Mon-Weds (incl.) 9-4.30 and Thurs WFH

Dear Ms Burkey,

following my enquiries with Highways and your other colleagues in the council, I have been directed to you for a contact that can assist with relevant technical details on the environmental matters for this planning application. Would you please advise me who to speak with.

Thank you,

Maurice Evans
Chartered Architect
A: The Tythe Barn, Rowden Lane, Chippenham, Wiltshire SN15 2NN
M: 07785 521016
E: mfelive@hotmail.co.uk

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.