

Jefferies Land Conservation Trust

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Registered Charity No: 1112836

Mr E Grace
Planning Inspector
Room 4/04
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

11 October 2011

Dear Mr Grace

Appeal reference number: APP/U3935/A/11/2155834

Re: Outline application for the erection of up to 890 no. residential dwellings, employment (classes B1, B2), local centre (classes A1-A5), community uses (classed D1), primary school, extension to hospital site including provision of land for emergency services, public open space, landscaping, 2 no. vehicular accesses to A4259 (details of eastern access only), site roads and associated infrastructure on land adjacent to Dayhouse Lane, and south of the Marlborough Road, at Coate, Swindon Wilts.

1 Introduction

1.1 I, Jean Saunders, have been involved, as a volunteer, in the development plan process for the Coate/Badbury Wick/Commonhead area of Swindon for 25 years. I have represented various groups in Swindon (that include Swindon Friends of the Earth in particular and, more recently, the Save Coate coalition and the Jefferies Land Conservation Trust). During this period, I have given evidence at Local Plan, Structure Plan and Regional Plan inquiries and appeal inquiries. I am also the Secretary of the Richard Jefferies Society and one of the key volunteers who opens the Richard Jefferies Museum to the public and helps look after the exhibits, building and grounds. I might add that all this work has been undertaken in a purely honorary capacity. I have received no payment for my work and I have no financial interest in the appeal area; I live 12 miles away from it. My interest is in the environmental, historic, literary, recreational and educational value of the area for this and future generations to enjoy. I am opposed to the

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Jefferies Land Conservation Trust Proof of Evidence

principal of development of Jefferies Land that includes the appeal site. Each permitted development has merely set a precedent for more and it has devalued the environmental and historic quality of the area. Swindon cannot afford to sacrifice any more of the landscape associated with the life and works of Richard Jefferies if it hopes to maintain any credibility as a town of culture.

1.2 Whilst the planning application related to this appeal is not as destructive to the environment as the larger one subject to the 2008 appeal, this does not make it acceptable. If permitted, it will set a precedent. We have learnt to our cost that the Local Planning Authority cannot be trusted to be consistent in setting its planning policy for the area.

1.3 Moreover, it is a tenet of planning law that if there is any doubt about the environmental impact of a development, then the environment should be given the benefit of that doubt – this is the basis of what sustainable development is all about.

2 Background to the Jefferies Land Conservation Trust.

2.1 The charity was established in September 2005 in response to the major development proposals and policies aimed at changing the character of the unique countryside east and south of Coate Water Site of Special Scientific Interest. The area of interest to the Trust includes the appeal site. The Trust is a registered charity. I am the Honorary Secretary of the Trust.

2.2 The Trust's aim is to protect and enhance this special landscape, set in the foothills of the North Wessex Downs Area of Outstanding Natural Beauty [AONB]. The appellants planning application for developing this area compromises and is in conflict with our aims.

2.3 The Trust's vision for 'Jefferies Land' places Swindon squarely on the map as a literary heritage site, a place for visitors to enjoy a special rural climate, a wildlife haven and a centre for study of the environment and historic landscapes. The main elements of the Trust's Vision are to:

- 1) maintain the rural landscape setting of Coate Water
- 2) enhance the biodiversity of Coate Water Site of Special Scientific Interest and the nature reserves at Coate Water, Dayhouse Copse and Burderop Wood North
- 3) provide a centre to study and appreciate literary landscapes as an inspiration to UK writers with a special focus on Richard Jefferies' key role in this evolution
- 4) demonstrate traditional crafts and environmentally sensitive alternatives that reduce man's impact on the land
- 5) feature the archaeological qualities of the area
- 6) provide educational opportunities for local people related to an appreciation of nature and living in harmony with it.

2.4 The appellants planning application for developing this area compromises and is in conflict with our vision. This is detailed on our website jefferieslandtrust.org.uk

3 Support for Swindon Borough Council [SBC] planning decision

3.1 The Jefferies Land Conservation Trust supports SBC's reasons to refuse planning permission and we wish to present other material considerations that clearly demonstrate that the appellant's planning application falls far short of achieving sustainable development. We believe that the planning application is unsustainable by virtue of its location, scale, layout and nature. If the scheme is allowed, the environmental damage will grossly outweigh any perceived benefits of the proposal and nothing will mitigate against the loss of a major literary site that is of international importance.

3.2 It is important for you to understand how this site has got so far in the planning process. Wiltshire and Swindon Structure Plan 2016 authorities, the Swindon Local Plan 2011 authority and the government planning inspectors – who recommended a change of use of the appeal area from rural to urban and from a valued high landscape area to a potential building site – ignored all Government planning policy guidance and previous development plan policies that secured protection of the landscape in question. SBC's desire to accommodate the wishes of the University of Bath were so strong that all other considerations were brushed aside. We believe that a great injustice was done to the planning system that runs contrary to PPS1 para 8 that calls for consistency in the planning process. The majority of the evidence that we have presented during the development plan process has been ignored. We have consistently argued that this area is too heavily constrained by environmental assets to permit the level of development suggested by Swindon Local Plan policy DS3 and now emerging policy NC3 in the Swindon Core Strategy. PPS1 para 19 confirms that 'planning decisions should be based on up-to-date information on the environmental characteristics of the area'. We believe the environmental assets of the area that include the setting of significant archaeological features and the importance of the landscape to Richard Jefferies, the wildlife value of Dayhouse Copse and ancient hedges, streams and woodlands, the agricultural value of the land, the recreational value of Dayhouse Lane, the views from the North Wessex Downs Area of Outstanding Natural Beauty all contribute towards an over-riding presumption against granting planning permission for this proposal.

4 Some planning history of the 'Coate' area

4.1 We examine some of the main elements in the planning history of the appeal site and the immediate area in order to reveal the inconsistency in the decision making process, the so-called evidence on which this was based and our concerns about the emerging Swindon Core Strategy.

4.2 The special quality of the landscape at Coate has long been recognised. In 1968, the Silver Report ¹ that examined the potential to create a town for over 200,000 people identified some 5261 hectares of greenfield land that might be developed at Swindon. Environmental considerations did not feature on the agenda at this time nor did the concept of sustainable development – only public perceptions of what should be preserved. The ‘developable areas’ included the Western Development Area [now completed], the Northern Development Area [nearly completed] and the Eastern Development Area [now proposed in the Swindon Core Strategy]. The assessment at that time excluded the land at Coate from development and took the view ² **that the open foreground between the town and the Marlborough Downs should be preserved ‘to form a fine setting to the New City’.**

4.3 The Wiltshire County Development Plan of 1970 identified the land at Coate as an **‘area of great landscape, historic or scientific value lying outside the AONB’.** We have provided evidence in other representations that reveal that the proposed North Wessex Downs Area of Outstanding Natural Beauty included the appeal site as part of the proposed nationally protected landscape. We pointed to the fact that central government decided to exclude the area as it was considered easier to use the M4 motorway and A419 trunk road (both completed in the 1970s) as convenient lines on a map to draw the AONB boundary. As such, the appeal site was not included in the AONB but there was no question that the landscape was not up to AONB standard.

4.4 A planning application for a Coate Water Business Park, that was rejected in 1988 by the former Thamesdown Borough Council, whilst a second planning application rejected on appeal by the Secretary of State for the Environment, took in the appeal site. Coate Water Park Limited planned to put all the buildings (that were low-density, low-rise), car parks and roads on an area of about 28 hectares. The Planning Inspector, who supported the appellant’s case, reported [paragraph 3.1.7] that ‘the potential for development and density in each field had been analysed by careful topographical analysis.... **This showed only 40.55 ha suitable for development north of Day House Lane, but not all that would be used’.** Half of this theoretically ‘developable’ land has now been used to build the new hospital and has planning permission for park and ride use whilst a further element of the land has now been identified as of significant archaeological value.

4.5 By 1998, SBC ruled out major development at Coate because **‘the area of land available for development is severely restricted by the significant environmental assets that need to be protected’** although SBC considered that some minor building work was

¹ ‘Swindon – A Study for Further Expansion’ published by the Swindon council, county council and Greater London Council.

² Paragraph 5.5

deemed possible³. An area of 65ha was identified at Coate as a possible development area for growth – the area is indicated on the figure on the next page. Some of this land was used to build the hospital.



Swindon Development Appraisal Study, 20 July 1998 - appendix 1d plan

4.6 On 11 July 1998, the planning application for the controversial new hospital at Commonhead was approved by SBC as a major departure from the development plan and government planning guidance (PPG13) in full knowledge that the development would have a high environmental impact. However, the matter of ‘need’ for a new hospital swayed the argument for approval. Also, it was made clear by SBC that the hospital would not set a precedent for more development. We are not arguing against the allocation of a further 5.5 ha of land for the hospital in the appeal site – indeed we believe that this is likely to prove insufficient for the need to cater for a growing population in the area. The remaining development proposed in the appeal site will prevent further expansion of the hospital and for sustainability reasons, this should not be permitted.

4.7 Then we move on to the blackmail scenario and SBC’s ‘gun to its head’⁴ of accommodating the wishes of the University of Bath who wanted land at Coate for a university campus which would be paid for in exchange of accepting 1800 houses and a large employment area. SBC fell over backwards to help the University and started the process of relaxing the planning policies for the area. The Swindon Principal Urban Area Study (September 2003) carried out by SBC and Wiltshire County Council

³ Wiltshire Structure Plan Development 2011, Swindon Development Appraisal Study, 20 July 1998, Swindon Borough Council/Wiltshire County Council - pages 20/21.

⁴ Draft Swindon Local Plan 2011 inspector’s comment in his report, p.78

identified land at Coate⁵ based on the environmental features assessed as 'poor' for the provision of an urban extension. Whilst the assessment concluded that 'more modest development would be possible' the land identified with the 'least loss of environmental benefits is the area between the Great Western Hospital and the M4 Motorway' although the impact on the North Wessex Downs Area of Outstanding Natural Beauty (AONB) was not assessed and it was noted that this assumed no great archaeological significance. Whilst the last planning appeals related to the university proposals were turned down, SBC had paved the way for future development of the area, although the scale and nature of development has not been agreed.

4.8 The next 'evidence base' was SBC's Small Scale Urban Extensions Study, January 2008. Coate was found to be a sustainable location for 750 houses, but the evidence was subjective and weighted in the extreme. For example proximity to the AONB is cited for ruling out more than 200 houses for Cell A (between the M4 and Lydiard Park) that is some considerable distance from the Downs, whilst Cell K (Coate/Badbury Wick) abuts the AONB - this significant negative impact is virtually ignored. Cells H and J are noted for containing high quality agricultural land (grade 3a) whilst Coate boasts even higher grade 2/3a and this isn't even mentioned. The Richard Jefferies' connection only applies to Cell K yet this is given no weight in the selection process apart from mentioning that the association is significant!

4.9 Employment site - In SBC's most recent Assessment of Allocated Employment Sites,⁶ Coate (see table reproduced on the next page) scored highly because the site could be 'immediately accessible from the A419 Trunk Road' and the 'wide roundabout, just off Junction 15 of the M4' when the Highways Agency has dictated that this will never be permitted!! The report also says that there are 'No obvious development constraints!' Apparently no-one noticed that the land abuts the North Wessex Downs Area of Outstanding Natural Beauty whilst Green Hill (upon which the employment area centres) is the most prominent feature in the landscape apart from noting 'its prominent location adjacent to the M4'. And, evidently, it is 'adjacent to the larger "Southern Development Area" allocation' that suggests the employment land will eventually run all along the M4 corridor! This is an appalling prospect for this lovely area that is currently appreciated by the patients, staff and visitors of the Great Western Hospital. The massive 15 ha employment area for B1/B2 use does not equate with the provision of 900 houses and the scale cannot be justified for the appeal area. The site is remote, only accessible from the Marlborough Road through the proposed housing estate or via the narrow lane through Medbourne. This country lane is much used for recreational purposes and it is most unsuitable for high volume vehicle traffic that this proposal will surely generate. The employment area is not located at a site where alternatives to the car are likely to be used. The assessment appears to assume that just because there is a bus service to the new hospital, the employment area will be equally served. However, this prospect is highly unlikely.

⁵ Page 84

⁶ Employment Land Review, 2007, Nathaniel Lichfield & partners for SBC

Allocated Site:

COMMONHEAD (COATE)

Reference

43

Area (ha)

23



Criteria	Comment	Score (out of 5)
<i>Current Use</i>	Greenfield allocated employment site.	
<i>Strategic Access</i>	Potentially immediately accessible from the A419 trunk road. Site adjoins Junction 15 of the M4.	5
<i>Local Road Access</i>	Possible access from a wide roundabout, just off Junction 15 of the M4.	4
<i>Proximity to urban areas, and access to labour & services</i>	Located to the south of the Swindon Urban Area. No residential properties nearby. Site located near to the Great Western Hospital with public transport routes serving the area.	4
<i>Proximity to incompatible uses</i>	No incompatible uses nearby. Site bounded by the M4 to the south and the A419 to the east.	5
<i>Site characteristics and development constraints</i>	Large greenfield site with generally level topography. No obvious development constraints.	5
<i>Market attractiveness</i>	A potentially prominent location adjacent to the M4 motorway.	5
<i>Planning Factors</i>	Adjacent to the larger 'Southern Development Area' allocation. Located on the edge of the Swindon Urban Area. Allocated for science related uses.	

[Scoring: 5 = best, 1 = worst]

TOTAL SCORE: 28

4.10 Based on SBC's Small Scale Extensions Study and Assessment of Employment Sites, we now have emerging policy NC3 in the draft Swindon Core Strategy: a policy based on selective, flawed and subjective evidence. We have submitted considerable evidence that calls on the removal of the land-use associated with NC3 and have asked for the re-introduction of a high landscape value policy instead that takes account of the literary and historic value of the site. This has been supported by over 3000 people.

5 Prematurity

5.1 It states in The Planning System: General Principles issued with PPS1 paragraph 17:

'In some circumstances, it may be justifiable to refuse planning permission on grounds of prematurity where a DPD is being prepared or is under review, but it has not yet been adopted. This may be appropriate where a proposed development is so substantial, or where the cumulative effect would be so

significant, that granting permission could prejudice the DPD by predetermining decisions about the scale, location or phasing of new development which are being addressed in the policy in the DPD.'

5.2 The appeal site is controversial. Over 52,000 people signed a petition opposed to the principal of developing the area whilst thousands more have written letters as part of the planning process. The public has demonstrated that the current planning application is unacceptable and the democratic process will be further denied if the appeal is allowed before the Swindon Core Strategy has gone through the due process of planning law. It is vital that the community has their say in developing a vision for the area in accordance with PPS 1 paras 40-42 (see p.26). There are many objections to the Commonhead policy NC3 that includes increasing the housing allocation and the objective and design principle 'To create a new landmark gateway to Swindon from the M4'. This demonstrates that SBC does not want a development that blends into the landscape but some modern design that will not protect, enhance and integrate with the views to and from the North Wessex Downs Area of Outstanding Natural Beauty and Coate Water Country Park. And if creating a landmark development for this area is current SBC thinking, the same objective will at some stage apply to the entire M4 corridor linking Swindon's frontage from J15 to J16 of the motorway. The countryside south of Coate Water Country Park is not covered by any protective policy in the revised Swindon Core Strategy. Even the proposed land-use policy for 'Commonhead' sets a precedent for further development along the M4 corridor west.

5.3 We are equally concerned that NC3 refers specifically to 15 hectares of B-use employment land. There has been no indication before that the employment area near J15 would be more than B1 use and previously, in view of its remoteness to the main Swindon Urban Area, the employment area needed to demonstrate clear linkages to the proposed university (Swindon Borough Local Plan policy DS3(e) to 'provide for up to 23 hectares of employment land for Class B1 uses that demonstrate clear linkages to the university'.) We have asked that the employment land is linked to the Great Western Hospital in order to achieve the same beneficial transport-related effect but this positive contribution to meeting PPG13 is not coming though the revised Swindon Core Strategy or the current planning application.

5.4 The revised draft Swindon Core Strategy land-use policy for the Eastern Development Area now supports 7,500 new houses but only 20ha of B-use employment land, whilst 'Commonhead' has 15 ha of employment land of B-use for only 900 houses. Given that the idea of the 'Commonhead' housing area was to encourage hospital staff to settle in homes near the hospital, the employment allocation will clearly encourage car-based commuter traffic to a remote area or give the housing developers another sound reason to push for more housing on the so-called protected buffer land east of Coate Water Country Park or to the south of the park. This is another matter that we wish to follow through the development plan process and another indication that the current planning application will set a precedent for more development west.

5.5 On 11 July 2007, the Jefferies Land Conservation Trust, Swindon Civic Trust, Swindon Friends of the Earth and the Richard Jefferies Society sent a joint letter to Swindon Council's Forward Planning team. In it, we asked for a reinstatement of the Local Landscape Policy that protected the high landscape value of the countryside for the Coate/Badbury Wick area that was removed from the previous town plan to enable DS3 to be adopted. We have repeated this point over and over again in response to draft Core Strategy policy SSP7: Commonhead and then to NC3: Land at Commonhead. The Jefferies Land Conservation Trust raised a petition in April 2011 that stated:

To: Swindon Borough Council

We, the undersigned, petition SBC to designate the open countryside between the A419, the Marlborough Road, the motorway and Broome Manor Lane as a high quality Landscape Character Area in order to protect the landscape setting of Coate Water Country Park, Dayhouse Copse Local Nature Reserve, the natural and archaeological history, as well as the literary importance of Jefferies Land and the views from the North Wessex Downs Area of Outstanding Natural Beauty.

By the end of the consultation period for the Swindon Core Strategy Proposed Submission Draft, in early June, nearly 3,000 people had signed the petition. This number continues to rise.

5.6 We have been informed⁷ by SBC that 'the Council will seek to protect this [buffer] area through legal agreement attached to any approved planning application on the land east of Dayhouse Lane. The scheme as proposed will make it difficult for any future extension to be developed into the Austin Land'. We do not believe that a legal agreement attached to a planning application carries any weight outside the appeal area. Grampian-type Conditions are always difficult to uphold as are any conditions attached to planning applications. Persimmon Homes and Redrow Homes might have legal options on the land east and south of Coate Water Country Park but the land is not under their control. Mr and Mrs Austin will definitely not enter into any legal agreement as they are keen to sell their field for development. Conditions and legal agreements only relate to an extant planning permission for a development site. If the development is completed and signed off – what prevents a new planning application for a new site being introduced particularly when any challenge and change is made to current land-use policy when the Swindon Core Strategy is up for review?

As such we believe that the planning application is premature; it will set a precedent for more infill development between the appeal area and Coate Water/Broome Manor Lane whilst we should not rely on conditions and Section 106 agreements to make an unacceptable planning application acceptable.

⁷ Private email dated 13 January 2011 from SBC's Richard Bell.

6 Richard Jefferies

6.1 We disagree completely with the justification in the appellant's revised Environmental Statement for developing Jefferies Land (Landscape & Visual Issues paras 5.4.14a – 5.4.15) and the conclusion that 'there would be a Neutral Effect as a result of the proposed development' on the landscape that inspired Richard Jefferies. The justification was based on what the Local Plan Inspector wrote about Jefferies in his report that failed to appreciate the merits of Richard Jefferies' work or the significance of the landscape as a major contribution to it. This area is quite possibly the most minutely observed and poetically evoked landscape in the whole of English literature. A highly original writer, Jefferies influenced some of the major figures of the 20th century – D H & T E Lawrence, W H Auden, James Joyce, E M Forster, and many lesser ones. Edward Garnett, a formative critic and editor, regarded *Amaryllis at the Fair* (Jefferies' last novel based on his life at Coate Farm) as a richer portrayal of rustic life than even Hardy had achieved – a view echoed by Q.D Leavis and others. Jefferies in his writings has recorded the history and culture of a crucial period in the English agricultural past, indeed his work constitutes a unique memorial of Englishness and the 'South Country', and should be valued as of the highest value to Swindon and its region. A long list of contemporary figures – writers, artists, photographers, journalists, scholars – have also written to condemn the proposed development.

6.2 Jefferies is regularly quoted in the national media. We gave recent examples from the last few weeks published in the *Times Literary Supplement*, the *Independent*, the *Times* and the *Guardian*. The *Guardian Review* dated 30 July 2005 flags up the importance of Jefferies land as a national asset. Readers were asked to write in and nominate the great classic writers of British nature – Richard Jefferies proved to be the top nominated writer. The article entitled 'Where the wild things were' by Robert Macfarlane specifically lists Jefferies' autobiography *The Story of My Heart* as reflecting Wiltshire's nature. This is the relevant extract from the *Guardian*:

...by far the most frequently nominated, was the novelist, memoirist and country-essayist, Richard Jefferies (1848-87). Jefferies was born near Swindon, and spent much of his life exploring the rural southern counties of Wiltshire, Sussex, Gloucestershire, and Somerset. His writings show him to be the exponent of a rare but deeply English materialist-mysticism. For he possessed and practised what the poet Jeremy Hooker has called "ditch vision" - an ability to find the extraordinary in the rurally local. For Jefferies, the English countryside was rife with wilderness. Not in the North American sense of wilderness as a function of grandness of scale, a phenomenon to be experienced only amid the red-rock dihedral citadels of the desert states, or the vaporous magnificence of the Niagara Falls, or the vast mirror lakes of the Rockies. No, Jefferies located the wild in the strange and ragged interzones of a farmed English landscape - in hedges, ditches, ponds, spinneys - and he wrote about that landscape with the same astonishment and wonder that his travel-writing contemporaries were voicing in their reports on the Amazon, the Pacific, and the Rub al-Khali.

6.3 On 10 October 2011, I received an e-mail from an American Professor of English that read as follows:

-----Original Message-----

From: Chaney, Norman

Sent: Monday, October 10, 2011 2:48 PM

To: info@richardjefferiesociety.co.uk

Subject: Membership of the Richard Jefferies Society

Dear Jean Saunders,

Thank you for your response to my interest in Richard Jefferies. Let me reply at some length.

I am a Professor of English at Otterbein University in Westerville, Ohio. In the course of writing a book on, as of now, seven nature writers, I intend to include Jefferies as one who has an immanental experience of the world of nature that is philosophical and religious, though non-theistic. That generally describes the approach I take to him in a chapter I am preparing for the book.

But beyond the book itself, we have a study-abroad program at Otterbein University that encourages students to travel and study (with faculty supervision) for a three-week period during summer or January. I am proposing one of these study-abroad programs (for about ten students) to Swindon and Jefferies country. Upon return to the university, students are required to bring their experiences to bear on an academic project.

In the spring of 2013, my wife and I plan to spend part of my sabbatical in England. (I have enjoyed other sabbatical experiences at Cambridge and Edinburgh.) During that time, we will be scouting possibilities for accommodations and activities for students in Jefferies country.

One of my purposes in joining the Richard Jefferies society is to broaden my acquaintance with people who know and love Jefferies, whereby my own knowledge and love of him might increase. In my opinion, he stands in rank with Thoreau as a writer who truly felt his way into the world of nature.

My best wishes,

Norman Chaney

It is just this type of response that highlights Jefferies' international importance and why the landscape that influenced his writing is so elemental and important to this and future generations.

6.4 The appellant's position is that the landscape that Richard Jefferies would have known is already degraded, thus inferring, so why not degrade the fields as well? That is no justification and neither is the statement that the fields to the south 'are no longer flower-rich hay meadows as Jefferies would have known them' (5.4.14d) – this situation is reversible and a key objective of the Jefferies Land Conservation Trust. Turning a Greenfield into a Brownfield site is not reversible in the normal time-span of man.

6.5 We wish to draw your attention to passages from Planning for the Historic Environment, 2010 - PPS5 that we have underlined. Please note that this PPS was issued long after the previous development plan inquiries were held.

Policy HE7: Policy principles guiding the determination of applications for consent relating to all heritage assets calls for:

HE7.1 In decision-making local planning authorities should seek to identify and assess the particular significance of any element of the historic environment

that may be affected by the relevant proposal (including by development affecting the setting of a heritage asset) taking account of:

- (i) evidence provided with the application
- (ii) any designation records
- (iii) the historic environment record and similar sources of information
- (iv) the heritage assets themselves
- (v) the outcome of the usual consultations with interested parties; and
- (vi) where appropriate and when the need to understand the significance of the heritage asset demands it, expert advice (from in-house experts, experts available through agreement with other authorities, or consultants, and complemented as appropriate by advice from heritage amenity societies).

HE7.2 In considering the impact of a proposal on any heritage asset, local planning authorities should take into account the particular nature of the significance of the heritage asset and the value that it holds for this and future generations. This understanding should be used by the local planning authority to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.

HE7.3 If the evidence suggests that the heritage asset may have a special significance to a particular community that may not be fully understood from the usual process of consultation and assessment, then the local planning authority should take reasonable steps to seek the views of that community.

6.6 We have been unable to convince the local planning authority that a literary landscape assessment of the Coate/Badbury Wick area should form part of the Environmental Assessment. As experts, we have provided evidence to show that Jefferies Land is a significant national (if not international) heritage asset. However, the local planning authority has not understood the special significance and neither have government planning inspectors.

6.7 We believe that SBC has failed in its duty to comply with policy HE7 of PPS5 and has not taken into account (HE7 para 4)

- the desirability of sustaining and enhancing the significance of heritage assets, and of utilising their positive role in place-shaping; and
- the positive contribution that conservation of heritage assets and the historic environment generally can make to the establishment and maintenance of sustainable communities and economic vitality by virtue of the factors set out in HE3.1

6.8 It is unfair to blame previous Planning Inspectors for the lack of weight that they attributed to the literary landscape importance of Jefferies Land when SBC has not deemed it to be of any significance. However, it is clear that members of SBC's planning committee do not share the dismissive attitude of the planners and believe that the literary landscape value of the appeal area is grounds for refusing planning permission.

6.9 We submitted two documents as part of our objection to the planning application. We could submit a further 400 articles/books/essays by Richard Jefferies that show how the area covered by the appeal is of significant importance to the nature and landscape writing of Richard Jefferies. The booklet entitled 'Coate and Richard Jefferies' by John Chandler specifically covers the area in question and is a good literary

landscape assessment of the area. *Greene Ferne Farm* by Richard Jefferies sets much of the scene at Coate as does *Wild Life in a Southern County*, *Amaryllis at the Fair*, *The Story of my Heart*, *Round About a Great Estate*, *Wood Magic* and *Bevis*, whilst 90% of the remaining books and essays reflect memories of Coate and the Downs. Here is the beginning of an early draft of Richard Jefferies' autobiography that appears in manuscript form. It describes the spiritual benefits of the views across the fields to Liddington Hill from Dayhouse Lane:

The sun rises in the morning at Coate, Wiltshire, where I used to live, over the Down called Liddington Hill.

Immediately after getting up I used to go out to the outside of the garden and rickyard to a spot whence, under an elm, I could see clear across the fields eastwards to the hill... I involuntarily drew a longer breath, after which my breath came slower and I forgot everything.

6.10 The Richard Jefferies Museum: There has been a steady increase in visitor numbers to the Museum - interest in Richard Jefferies is growing again. He is regularly quoted in the national media and all his works are still available and some are available in translation. Volunteers from the Richard Jefferies Society have opened the Museum to the public for over 20 years. To date, this year, and given the limited number of open days, we have had over 900 visitors whilst volunteers have donated the equivalent of 160 full work-days gardening, tending the property and opening it to the public. This 'management' is a prime example of the government's goal to see community groups working with local authorities in order to maintain public buildings and hence saving the Council thousands upon thousands of pounds. The Museum attracts visitors from all around the world and part of the experience is to walk in Richard Jefferies' footsteps and visit the places that he wrote about. The enjoyment of this experience, of course, relies heavily on the fact that the old house was located in a rural setting that has already been subject to considerable change. The appeal area is one of the few remaining pockets of countryside that Richard Jefferies would still recognise and the built environment has changed very little to the south-east. Visitors to the Richard Jefferies Museum express great disappointment that the views from the Museum, Dayhouse Lane, Coate Water and Liddington Hill (some of Jefferies' favourite places) are now blighted by the new Great Western Hospital. As such, it is not in the interest of the Richard Jefferies Museum to witness further destruction of the rural landscape that featured so strongly in the author's writing.

6.11 A Richard Jefferies Museum Trust, supported by SBC and Forward Swindon, was set up in September 2011. It aims to make the museum more accessible to the community, to improve the educational facilities and to highlight the areas importance as an influence on Jefferies' writing. Whilst Jefferies is best known for his nature writing, he was equally passionate about the local archaeology, and the state of farming in Victorian England. He was a social historian as well as a nature writer, a mystic as well as a local reporter. As such it is extremely important that the literary character of the Coate area is not further degraded by inappropriate development.

6.12 The effect of the proposed development on Jefferies Land and on the Richard Jefferies Museum will be a significant negative effect that will not be reversible and cannot be mitigated against.

7 Visual Impact

7.1 It is still impossible to picture how the development would look from Liddington Hill, the AONB, Dayhouse Lane and Coate Water. The photographs submitted by the appellants in the revised landscape assessment do not help as they are, of course, carefully selected to minimise the visibility of the application site. The visual intrusion of the hospital in the landscape has made us all very wary of what further development might add. We fear the worst.

7.2 We suggested to SBC that it would be helpful if the developers could submit photomontages of what the development would look like completed (during the winter months) from key 'sensitive' receptors that include:

- All onsite Scheduled Ancient Monuments,
- All onsite archaeological sites of significant importance as identified by English Heritage
- All onsite listed buildings including the milestone (made famous by Richard Jefferies) and Richard Jefferies Museum
- Dayhouse Copse
- Liddington Hill
- Coate Water Country Park
- Great Western Hospital

This suggestion was never taken up. We still believe that this information would help inform the planning appeal.

7.3 We have included two photographs: the first was taken on 13 November 2004 at the 'Hands Around Coate Water' event. Without meaning to do so (it was taken to show a paper-chain of 'hands' strung out around Coate Water), the photograph demonstrates the significant intrusion of the new hospital on the landscape setting of Coate Water, albeit that it was taken with a zoom lens. Given that the hospital is over a kilometre away from where the photograph was taken, it does indicate why the public is right to question the visual impact of further development between the hospital and Coate Water. The second photograph was taken on 18 March 2005 looking across from Liddington Castle to the appeal area. It demonstrates the significant visibility of the fields in question and the blot on the landscape created by the new hospital that should not set a precedent for more development.



7.4 We are convinced that the proposed development will have a significant and detrimental impact on the views from Liddington Hill. The advantage of protecting the views to and from the North Wessex Downs AONB and Coate Water Country Park is that, by default the remaining views of the landscape that Jefferies would have known and the setting of the archaeology of the area would also benefit.

8 Design and quality of development proposed.

We see no evidence that the proposal will be anything other than a modern design that is not consistent with the historic and literary landscape value of the site. We realise that this is an outline planning application but the nature and quality of the design will be extremely important if the appeal is allowed. Steeped in such ancient history, this should be reflected in the

design of all buildings. The architecture of the new hospital has indicated the negative impact on the landscape as viewed from Coate Water, Dayhouse Lane and the AONB – we do not want to see more of the same. The majority of the buildings next to the appeal area were designed to meet the needs of a strong farming community. The cottages were/are thatched or slate roofs over stone walls. It is unlikely that a planning application for a few more thatched cottages, that would add to the tourist value of the area, would generate public concern. This is not on offer.

9 Transport matters

9.1 The proposed development area does not integrate readily into the main urban area of Swindon. Coate Water effectively separates the site from movement to the west whilst the busy Marlborough Road, A419T and M4 act as barriers to movement, north, south and east. I personally spend a good deal of time at the Richard Jefferies Museum located on the corner of Dayhouse Lane and the Marlborough Road. I can attest as to how busy the Marlborough Road has become since the hospital was located at Commonhead. The Marlborough Road is also the main approach road into Swindon from Commonhead that attracts traffic from the M4, A419T, from the Downs villages and settlements to the south of the M4. It is very difficult to approach and exit the Richard Jefferies house by car. The speed limit is 50mph and that is regularly exceeded even though a 40mph limit is set at the approaches to Commonhead and Coate Roundabouts. We believe that the Marlborough Road is already at capacity and any additional traffic generated by the proposed development can only further reduce the amenity value of the Richard Jefferies Museum. The grounds of the Museum have already lost frontage to a road-widening scheme and there is a row of lime trees, of great importance to Richard Jefferies, that now stand alongside the Marlborough Road that must not be sacrificed for the expediency of allowing this development to go ahead. We are concerned that Section 106 money is proposed to upgrade the cycle and footpath from Coate Roundabout to Dayhouse Lane. Given the Jefferies' farm wall on one side and the lime trees on the other, this cannot be achieved without destroying the trees. This would generate major objections from SBC's arboriculturalist and ourselves.

9.2 Even if the residents of the proposed new houses worked at the hospital, or in the proposed employment area, the new community will have poor access to other amenities and community facilities. The only existing community facilities within 1km of the appeal area are two pubs, a petrol station, a museum and Coate Water. The nearest secondary school is at Dorcan – some 3 kilometres from the appeal area and there are no existing direct bus routes to link the two areas. The nearest shops and primary school are at Liden. This fact was pointed out to the Strategic Planning Authorities when they fudged the results of the Swindon Principal Urban Area study undertaken to inform the review of the Wiltshire & Swindon Structure Plan to 2016 on the assumption that the Coate Development Area took in land both east and west of Coate Water. In the assessment, the proximity of 'Coate' to jobs was given as 'good'. The SPAs state: 'The Pipers Way Business Park is adjacent to this area' [page 63] when, in fact, it is inaccessible from the appeal area and the former proposals. The only

significant local job provider associated with the appeal area is the new hospital. At a stroke, the figure of 9,600 jobs within 1 kilometre of the assessment area [table 2 page 61] is reduced to just over 3,000.

9.3 The appeal area is the furthest away from the main railway, coach and bus station of any developed area in Swindon Borough apart from Highworth. Its proximity to the M4 motorway and the A419 Trunk is more likely to generate car-based traffic accessing the site. Indeed it is very easy to argue a case that workers can readily commute in by car and never make use of any of the facilities in Swindon that might generate economic prosperity. Equally housing in the appeal area with close proximity to these roads is more likely to attract workers who commute out of Swindon but view Swindon's housing market as a cheaper option than, for example, Reading.

9.4 However on the matter of the road layout in the appeal area, we have given much thought as to how Dayhouse Lane and the Richard Jefferies Museum (on the corner of Dayhouse Lane and the Marlborough Road) could be best served. Our view is that there should be no access to Dayhouse Lane from any of the proposed buildings, including the proposed employment land, in the appeal area. We object strongly to any development east of Dayhouse Lane. The proposed employment area in the appeal site not only sets a precedent for more infill development around Coate Water, it also breaches Dayhouse Lane and is unacceptable. We have stressed elsewhere in our objections to the planning application the reasons why it is important to maintain the recreational and historic value of Dayhouse Lane. It acts as a rural gateway to the downs and its small villages and hamlets.

10 Flood risk

Dayhouse Lane regularly floods, albeit not to unmanageable levels, whilst many of the old properties that abut the appeal area have also been known to flood. The old thatched farmhouse at the Richard Jefferies Museum is prone to flooding – the main sewer from Coate hamlet runs through the back garden of Jefferies house and we are aware that at times groundwater level is very high (there is a well in the garden of the Jefferies' house). Houses at Coate are also set below ground-level and flooding has taken place - the Coate Residents Association can contest to this and have submitted photographic evidence dated March 2008 when the road and fields proposed for housing development were flooded along with the ditches. The Coate Water roundabout underpass regularly floods bringing foul sewer matter into the public walk-way (see article page 14 dated 28 May 2007, *Swindon Advertiser*).



March 2008 – proposed residential area at Coate



Coate Lane flooded by the Spotted Cow at Coate, March 2008

11 The impact on the archaeology and listed buildings in the area.

11.1 We believe the setting of listed buildings will be compromised – namely the Jefferies Museum that opens onto Dayhouse Lane, those at Badbury Wick and the milestone opposite Coate cottages. Richard Jefferies wrote about and described the wording on the milestone in his essay ‘Meadow Thoughts’ and the information has added value to the description of the Grade II listing. The milestone is visited by Jefferies’ followers in its own right and is part of an historic walk guide⁸. We could extol the virtues of the Richard Jefferies Museum but we hope that the Planning Inspector will visit

⁸ *In the Footsteps of Richard Jefferies: Coate Water*, Richard Jefferies Society, September 2007

the Museum to see for himself. Dayhouse Farm (also listed), is well-known as the birthplace of Richard Jefferies' wife whilst his novel *Greene Ferne Farm* revolves around the farmhouse and the fields and copse.

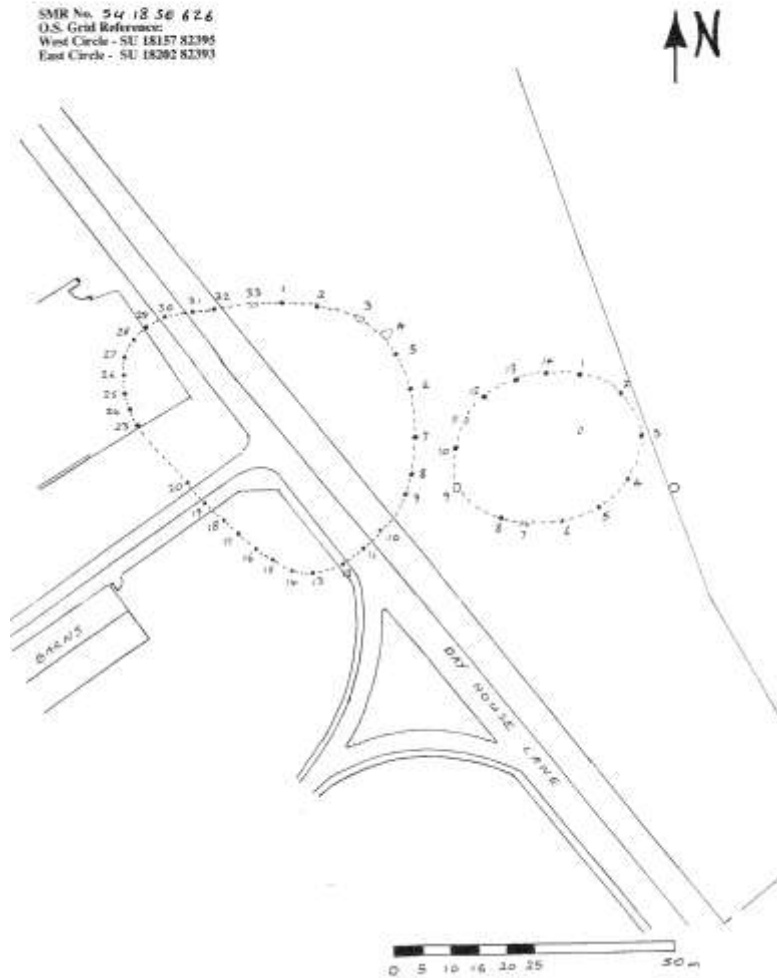
11.2 The County Archaeologist described the Coate area as 'a remarkable complex of archaeological remains' going back to the Mesolithic (stone age) with a considerable amount of Bronze Age and Medieval activity along with more modern Roman activity. Whilst we accept that many of the fields of archaeological significance have now been taken out of the building programme, it does not make the development around these finds any more acceptable. The juxtaposition of stone age next to modern buildings is an anachronism that future generations (as well as ourselves) will find abhorrent. The history of the Stone Circles in the area is extremely interesting and under-explored – see 11.3.

11.3 STONE CIRCLES: It is well documented⁹ that there were about six stone circles in the Coate/Broome Manor/Badbury Wick area that were linked by avenues of stones. Most of the circles and avenues were destroyed and the stones used in road-building elsewhere. Indeed one of the stone circles was destroyed in order to build the M4 motorway whilst another is reported to lie underneath Coate Water lake. The stones that form the Scheduled Ancient Monument along Dayhouse Lane were probed and found to be up to 12 feet long although mostly buried and had all tumbled down when recorded in 1893. Apart from this Stone Circle that was partly destroyed by the construction of Dayhouse Lane, A D Passmore discovered 'another circle to the S. W. of the Dayhouse circle' About a quarter of a mile away, he found another. Richard Jefferies was the first to note the presence of the stones. A walk around Coate Water reveals a large number of large sarsens lying in a haphazard manner that might once have been arranged to be part of the ancient ritual ceremony of our ancestors 3-4,000 years ago. There was a Bronze Age settlement just south of the lake. Two large stones were discovered in Dayhouse Lane in Spring 2009 whilst workers were clearing out a ditch - these are more than likely to be part of the stone circle that is a Scheduled Ancient Monument. Further evidence was discovered recently (2009) by Paul Daw who lives in Cambridgeshire and was given permission by the owners of Dayhouse Farm to douse in the field with the remains of the scheduled stone circle. Paul found two circles forming a figure 8 that have not been recorded before. This field was never subject to an archaeological survey by the developers. It is all very exciting even if the stones that formed the circles might be long-gone. However, some might still be buried. A diagram of Mr Daw's findings are reproduced below and his original letter of introduction:

I have recently gained permission from Mr. C. Horton at Day House Farm to carry out a survey in his meadow opposite Day House Farm, to look for the Coate stone circle using divining rods. I have been visiting all of the stone circle and henge sites in England over the last eleven years, and have currently visited 355 of about 450 sites. Over the last four years I have been using

⁹ A D Passmore and the Stone Circles of North Wiltshire, Aubrey Burl, Wiltshire Archaeological & Natural History Magazine, vol 97 [2004], pp 197-210

Coate Stone Circles
Day House Lane, Swindon,
Wiltshire



divining rods in my surveys, since I found at the Rollright stone circle that divining rods can detect the ring of stones at all stone circles, and can detect each stone position, whether still in position or not.

I was expecting to find possibly one stone circle, but in fact found that there were two stone circles. The larger west stone circle measures about 50 metres diameter (N-S) and 50 metres (E-W) but is rather irregular in shape, and I believe it has 33 stone positions, although a small section in the west, which I believe contains two stone positions, is difficult to measure at the moment as it contains dense scrub. Day House Lane complete bisects this circle.

The east stone circle is elliptical in shape and measures 25 metres (N-S) and 30 metres (E-W). Divining rods show that it had 14 stone positions, of which three fallen stones lay on the ring. A smaller stone lies within this ring. The west stone circle has three fallen stones, which all lie on the ring. Interestingly, two sarsen stones, which currently lie by the road to the south of the meadow, were found while clearing the ditch near the site of the stone circle. I believe that it is very likely that they are from the stone circles.

A simple resistivity survey, which could be completed within a day, would indicate if there are any further stones buried beneath the surface. An excavation where I am predicting the stone positions to be, would quickly determine if the stone sockets are still in place. I always send plans of my surveys to the County Sites and Monuments Records Officer, and as the

English Heritage Head Office is in Swindon, I shall send a copy to them also, although I am not sure if it will arouse any interest.

I believe I have located the site of the large stone circle near Fir Clump and Burderop Wood, which was bisected by the M4 Motorway when it was built. I have located half a dozen large stones by the access track to the footbridge over the motorway, which is close to the centre of the circle.

Another stone circle was reported just off Broome Manor Lane, and my divining rods confirm the presence of the circle in the grounds of 16 and 17 Chedworth Gate, very close to the grid reference given for the site. To my amazement there are over thirty large stones on the estate, quite likely from the stone circle. It seems that Swindon has been very 'cavalier' in its attitude to the stone circles in its vicinity in recent times, and it would be tragic if the Coate stone circles suffered a similar fate. Henges and stone circles are the earliest monuments built by man, when man first changed from hunter-gathering to farming. They are unique to the British Culture, and precede the pyramids, and are an important part of our heritage, of which we should be proud.

11.4 The land identified as a playground and playing fields for the primary school opposite Dayhouse and west of Dayhouse Copse is a substantial Roman settlement with many finds close to the surface. It was recommended that the surface of the field should be raised to protect the remains before a new playing field is laid.

11.5 Badbury Wick Farm is a complex of prehistoric activity and 11-13th century medieval remains with upstanding earthworks that will now be preserved in situ. The County Archaeologist believed that the earthworks were probably of schedulable quality and recommended retaining several areas as pasture and to retain an area of ridge and furrow. Again the proposed building designs around the area will do nothing to complement the history of the site.

11.6 When the planning application for the hospital was submitted, we were assured that there was no archaeology of interest. However, exciting finds were detected both east and west of the hospital field. An archaeological study was carried out on the field between the hospital and A419 as part of the evaluation process for the Park and Ride site. Seven trenches were dug and all seven revealed features ranging from elements of a Middle Bronze Age settlement [trenches 2 and 3]; Roman features, dating to the 2nd century in trenches 4 and 5 and post-medieval features in trenches 1, 6 & 7.

11.7 As such, knowing what we knew about the archaeology of the site in the appeal area, it is apparent that the archaeology of the Coate area is significant and of enormous educational and cultural value to Swindon. We believe that this area is a Neolithic gateway site to Liddington Hill but there has been no detailed exploration to back this up. If the link were to be proven it would form a unique and nationally important site. Whilst it is possible to take out areas of significant archaeological importance from the built areas, to set an ancient landscape in a modern building site is not conducive to respecting our archaeological heritage. To retain such an ancient landscape next to modern Swindon would be a cultural positive for a

town that is seen to the outside world as a cultural desert and blot on an otherwise special rural landscape.

12 Biodiversity

12.1 There are three particular species in the appeal area that give cause for concern: bats, badgers and otters. Otters have been found in the feeder streams to Coate Water at the southern end and next to the proposed employment area. Dayhouse Copse, a local nature reserve, is a rich habitat for badgers and bats. We have reproduced the badger survey results produced by Conservation Consultancy Ltd. in October 2003 on page 26. We believe that the buffer proposed around Dayhouse Copse is insufficient to protect the long-term viability of the badger community. Given that the badgers have already lost major setts when the hospital was built, they will be driven out of the area should the development proceed.

12.2 There are tree preservation orders on the majority of the trees in the area. Many are ancient, native and of great ecological value. Many contributed to Richard Jefferies' thinking places. Some are valuable bat roosts and we have pointed out in our representations previously submitted that five protected species of bat have been identified in the area. Providing a few bat boxes is no compensation for the loss of habitat and trees.

13 Loss of high-grade quality agricultural land

13.1 Swindon Friends of the Earth raised concern about the potential development constraint of agricultural land at Coate many years ago. I presented evidence to the EIP of the WSP 2016 pointing out the agricultural quality but even so the EIP Panel Report dated October 2004 states in paragraph 5.37:

The Study found that much of the area is subject to severe environmental constraints, since Coate Water is an SSSI, and the western part of the area is high agricultural land. However, the eastern part of Area D [Coate] is not subject to these constraints and emerged from the Study as the most sustainable location for growth, with an overall assessment of 'good'.

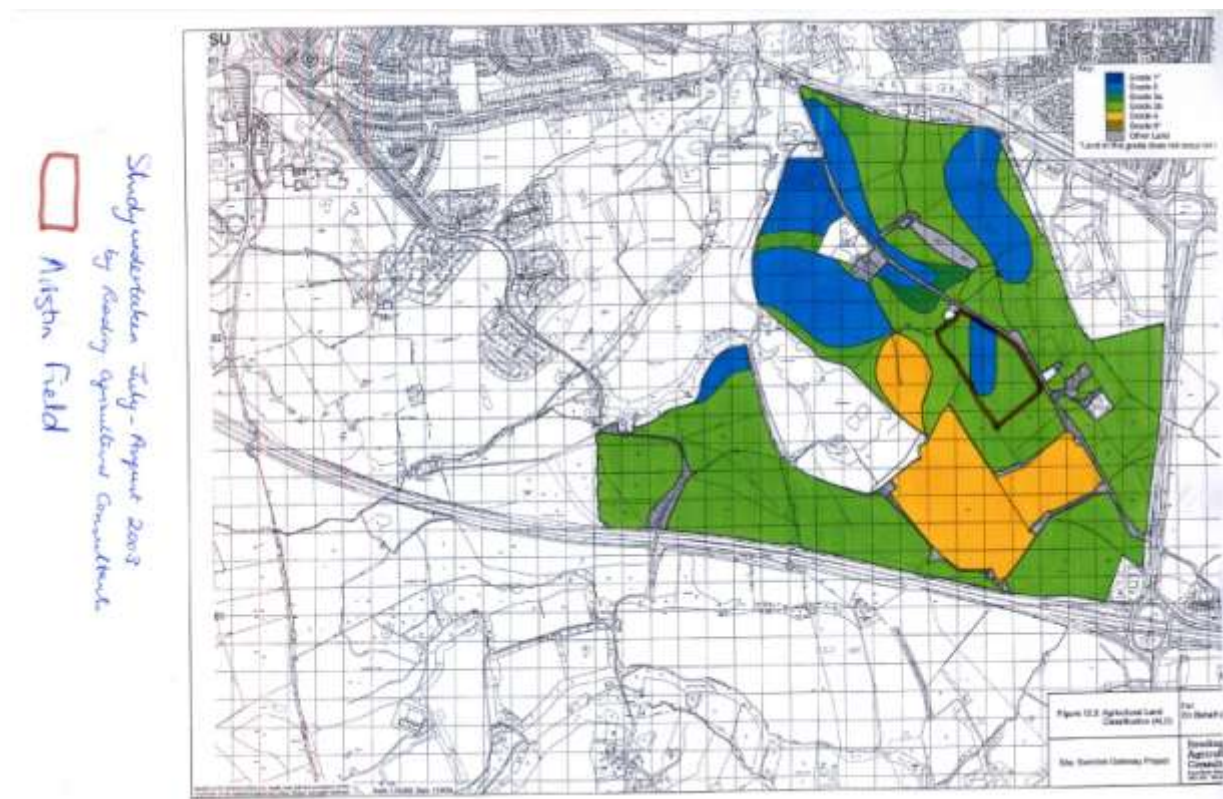
This is clearly not true as the diagram on the next page shows.

13.2 It is government policy that the best and most versatile agricultural land should be protected from development, unless there is no alternative. Planning Policy Statement 7 [Sustainable development of Rural Areas], paragraph 28 states:

The presence of best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations (e.g. biodiversity; the quality and character of the landscape; its amenity value or heritage interest; accessibility to infrastructure, workforce and markets; maintaining viable communities; and the protection of natural resources, including soil quality) when determining planning applications. Where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher

quality, except where this would be inconsistent with other sustainability considerations.

13.3 As the land-take for Grade 2 and 3a high quality agricultural land constitutes about 20% of the appeal area at Coate, it would appear to be a considerable constraint to development particularly at a time when local food production has become even more important to the economy, sustaining not only our lives but helping to contribute towards the creation of a more sustainable society. Given that there is a considerable amount of Grade 3b land and lower around Swindon, it cannot be argued that there are not alternative sites of lower agricultural land quality more suitable for development. Given that PPS7 para 28 also includes taking account of other sustainability considerations that include heritage interest (e.g. Jefferies Land), these environmental assets all add weight to refusing planning permission for this site.



14 Conditions and Section 106 agreements

14.1 At the last planning appeal inquiry for this area we were denied the opportunity to take part in the discussions related to conditions and section 106 agreements that should be in place if the appeal was allowed. These same conditions have been taken forward should planning permission be given. We believe that they are inadequate and do not compensate the local community nor do they mitigate against the loss of significant assets. It is impossible to put a price on the economic value of losing a recreational country lane, a major literary site, the health benefits gained to patients and staff at the Great Western Hospital, the appreciation of the setting of Coate Water as a COUNTRY park, the loss of protected species and habitats, the fragmentation of special archaeology and further despoliation of views from

Liddington Hill. This 'loss' also includes the Richard Jefferies Museum that will be materially affected by the proposals. Visitors from all around the world take advantage of exploring the countryside made famous by Richard Jefferies as part of their visit to the Museum.

14.2 If this proposal is allowed, the people would want something special – not another mass-build housing estate, modern office blocks and industrial units. The appeal area is a gateway to the Downs and has historic links to Liddington Hill and its iron-age hill-fort. Time should be spent at the planning appeal inquiry to discuss what type of design, building materials and layout might be acceptable. This should be a discussion where the community is involved and not agreed behind closed doors. We ask that the following matters should be included:

14.3 The remaining farmland to the east and south of Coate Water needs special protection in perpetuity to enhance the ecological quality of Coate Water and the views from the Park. The developers should buy the land for the Community and set it into conservation use in perpetuity.

14.4 A bridge should be provided at the south end of Dayhouse Lane for traffic to cross from east to west of the lane in order to gain access to the employment area. There should be no access to any new buildings from Dayhouse Lane and it should not be blocked up or altered (no tree or hedge loss, or the introduction of street lighting).

14.5 Any street lighting should be kept to the bare minimum, if required at all, in order to preserve the dark skies requirement of the AONB.

14.6 No trees should be felled along the Marlborough Road (particularly the row of lime trees next to the Richard Jefferies Museum) or Dayhouse Lane and no hedges lost either.

14.7 No building should be taller than 2 storeys and all roofs should be pitched and either thatched or with slates. Only buildings that reflect the vernacular style contemporary with the Victorian era or earlier period (e.g. thatched cottages that were once dominant at Coate and Badbury Wick) shall be allowed.

14.8 Section 106 money should be allocated in order to protect and enhance, at the bare minimum, Coate Water Country Park, the Richard Jefferies Museum, the archaeology, Dayhouse Copse Local Nature Reserve, and the Grade 2 listed mile-stone at Coate as well as public open spaces created within the development.

15 In Conclusion

15.1 We believe that if the appeal is allowed, the development will have a detrimental impact on the setting of the Richard Jefferies House & Museum and to other Grade 2 listed properties on Dayhouse Lane as well as the Grade 2 listed milestone at Coate. It will have a detrimental impact on the

setting of the archaeological features within and next to the appeal site. It will have a detrimental impact on the wildlife value of the area including Dayhouse Copse and protected species of bat, badger and otter. A fifth of the appeal area is graded as the best and most versatile farmland, and there are few areas of this quality around Swindon. It will have a detrimental impact on the views from Liddington Hill and the hill fort. It will destroy a literary heritage site and spoil a tranquil country lane at the southern end of Dayhouse Lane much used by walkers, ramblers, joggers, cyclists, half-marathon runners (it is reported in the *Swindon Advertiser*¹⁰ that 1800 runners took part in this year's half-marathon held on 10 October 2011), and horse-riders.

15.2 Moreover we are concerned that the majority of the employment land is located west of Dayhouse Lane setting a precedent for further development east and south of Coate Water Country Park and a Site of Special Scientific Interest. The material consideration of precedence is particularly significant given that we have been given assurances over and over again that the hospital would not set a precedent to open up an area that has been protected for its high landscape value until recently. Swindon Council has reneged on its promise to protect the area for future generations to enjoy. The layout of the development is not sustainable and will be heavily reliant on a car-based community and work-force. Very few of the proposed houses are situated close to the proposed primary school and shops but it is clear that the school is ideally placed to encourage further house-building west of Dayhouse Lane. It could and would be argued by developers that it would make the proposed layout more sustainable, if further infill development was allowed that linked the Coate area along the M4 corridor to the main urban area of Swindon.

15.3 We have no faith that a permanent protective buffer of countryside will be retained around Coate Water Country Park and we still haven't had an opportunity to put our case to a Planning Inspector about the emerging policy NC3 in the Swindon Core Strategy. The planning application is premature.

We request that you dismiss this appeal.

Thank you.

Yours sincerely

Jean Saunders
Honorary Secretary

¹⁰ http://www.swindonadvertiser.co.uk/news/9296091.Runners_step_out/

APPENDIX 1

PPS1 paras 40-42 *Community involvement*

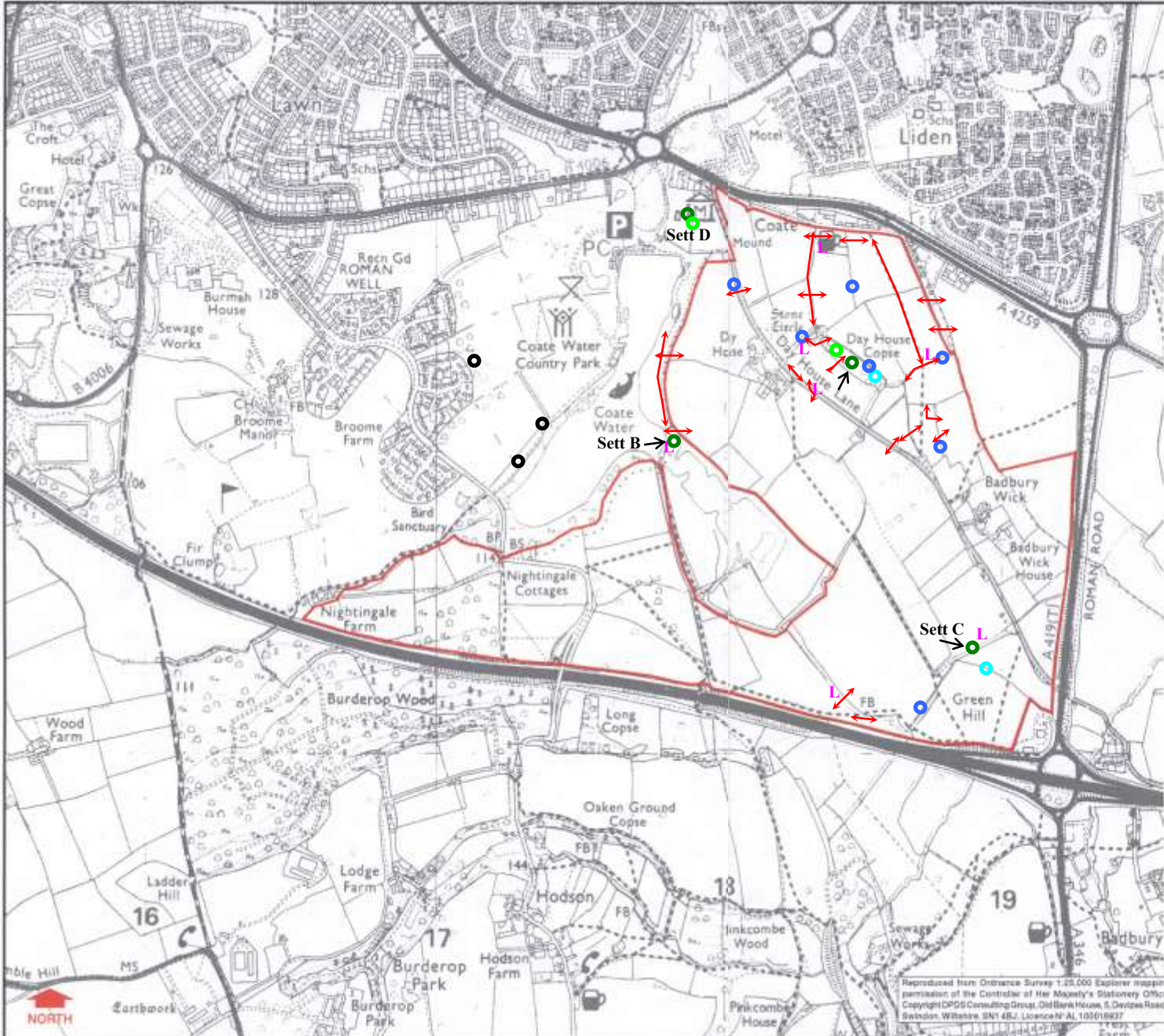
40. Planning shapes the places where people work and live. The planning system operates in the public interest to ensure the development and use of land results in better places for people to live, the delivery of development where communities need it, as well as the protection and enhancement of the natural and historic environment and the countryside. The outcomes from planning affect everyone, and everyone must therefore have the opportunity to play a role in delivering effective and inclusive planning. Community involvement is vitally important to planning and the achievement of sustainable development.

41. One of the principles of sustainable development is to involve the community in developing the vision for its area. Communities should be asked to offer ideas about what that vision should be, and how it can be achieved. Where there are external constraints that may impact on the vision and future development of the area (for example, those that may arise from planning policies set at the regional or national level) these should be made clear from the outset. Local communities should be given the opportunity to participate fully in the process for drawing up specific plans or policies and to be consulted on proposals for development. Local authorities, through their community strategies and local development documents, and town and parish councils, through parish plans, should play a key role in developing full and active community involvement in their areas.

42. Planning authorities should build a clear understanding of the make-up, interests and needs of the communities in their areas. Communities will be made up of many different interest groups, for example, relating to a particular place, issues (such as access for the disabled, local environmental quality, or support for small businesses), values or religion. Some of these will be well established and represented. But some groups may be less well equipped to engage with the planning system. An inclusive approach should be taken to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Identifying and understanding the needs of groups who find it difficult to engage with the planning system is critical to achieving sustainable development objectives.

43. Community involvement in planning should not be a reactive, tick-box, process. It should enable the local community to say what sort of place they want to live in at a stage when this can make a difference. Effective community involvement requires an approach which:

- tells communities about emerging policies and proposals in good time;
- enables communities to put forward ideas and suggestions and participate in developing proposals
- and options. It is not sufficient to invite them to simply comment once these have been worked up;
- -consults on formal proposals;
- -ensures that consultation takes place in locations that are widely accessible;
- -provides and seeks feedback.



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Client	DPDS Consulting Group	
Project	Swindon Gateway Study	
Title	Location of Badger Setts - Preliminary Assessment	
Date October 2003	Scale SCHEMATIC ONLY	Drawing C1010 Fig. 1

- KEY**
- Site Boundary
 - Main Sett
 - Annex Sett
 - Subsidiary Sett
 - Outlier or Single Hole
 - Historical records – status unknown
 - Tracks with signs of foraging and dung marking
 - Latrines

A1
Jel

