

Report to the Strategic Planning Committee

Date of Meeting	12 December 2012		
Application Number	N.13.01593.FUL		
Site Address	Kemble Enterprise Park, Nr Kemble, Glos, GL7 6BQ		
Proposal	Hybrid Application (Full and Outline) For Employment Development Class B1 and B8 Uses. Resubmission of planning application 11/01531/FUL		
Applicant	Kemble Business Park Estates Ltd		
Town/Parish Council	Crudwell		
Electoral Division	Minety	Unitary Member	Councillor Chuck Berry
Grid Ref	395674 195945		
Type of application	Hybrid		
Case Officer	Charmian Burkey	01249 706 667	Charmian.burkey@wiltshire.gov.uk

Reason for the application being considered by Committee

Under the Scheme of Delegation Specific to Planning, this application falls to be considered by the Strategic Planning Committee by reason of it being a large-scale major application which, by its nature would raise issues of more than local importance.

1. Purpose of report

To consider the above application and to recommend that planning permission be REFUSED.

2. Report summary

The main issues in the consideration of this application are as follows:

- Principle of development/policy setting.
- Effect on listed buildings on site and the Heritage Asset.
- Access & Highways.
- Design, appearance and layout
- Effect on landscape setting of area.
- Ecology
- Amenity of local residents.
- Sustainability.
- Other matters eg safeguarding.

The application has generated 2 letters of comment from local residents – raising objections. Crudwell Parish Council raise no objections. Kemble Parish Council's comments are awaited.

3. Site Description

The application site forms part of the former RAF Kemble, located within Wiltshire and relates to an existing employment site known as Kemble Airfield Enterprise Park. The site is located within open countryside with Kemble village being some 1.5km to the north. There are sporadic houses in the locality.

The site comprises of a group of buildings towards the front of the site, many of which are already in business use. Further into the site are 2 pairings of listed hangars and to the north 3 listed hangars, some of which are in business use. There is also a listed Water Tower which is evident when entering the site and forms a focal point when driving in. The remainder of the site is largely open with a gentle slope south to north and very little vegetation or trees.

4. Relevant planning history

10/04375/SCO – Request for Screening and Scoping Opinion.

11/01531/FUL – As this application (with amendments) refused for the following reasons:

- The proposal is located within open countryside and on a Greenfield site within a former MoD site. The proposals are not considered to be limited expansion or redevelopment of an existing premises; are not well related to any existing settlements and are considered to be remote, involving development of an open area. The proposals are thus considered to conflict with policies BD5 and NE20 of the North Wiltshire Local Plan 2011 and Wiltshire Core Strategy Policy 37.
- The proposals lack sufficient detail to ensure that they preserve or enhance the setting of the Grade II listed hangars on site and are thus contrary to Policy HE4 of the North Wiltshire Local Plan 2011, Wiltshire Core Strategy Policy 58, section 12 of the National Planning Policy Framework 2012 and the guidance given in S.16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- The proposals are set within an open landscape and of a scale, massing and design that is considered to have a detrimental impact on the “special” character of the area and its openness, causing the built form to coalesce, contrary to policy NE15 of the North Wiltshire Plan 2011, Wiltshire Core Strategy Policy 51 and Section 11 of the National Planning Policy Framework 2012 on conserving and enhancing the natural environment.
- The proposal is sited within a remote location with poor public transport facilities and the sustainability proposals put forward by the applicants are considered to be insufficient to outweigh the harm caused and thus the development is considered to be contrary to Policies T1 and T2 of the North Wiltshire Local Plan 2011 and policies DP1 and DP3 of Wiltshire Structure Plan 2011 together with Wiltshire Core Strategy Policies 60 and 61 and advice within the National Planning Policy Framework 2012 about delivering sustainable development.

5. Proposal

The proposal for consideration is in hybrid form (seeking outline permission for part of the site and full for the remainder) to allow a phased approach to the development of the site, whereby buildings are only constructed once their end users have been established and their exact specifications known. The proposal is different from application 11/01531/FUL in that:

1. Building 1, which is the gatehouse building, has been amended in terms of its illustrative design. It now advocates a more traditional design rather than the contemporary design previously put forward.
2. Building 2 has been moved to lie more within the main complex of buildings to minimise landscape impact and to remove impact on nearby listed buildings. The scale of the building remains unchanged.
3. Building 3 has similarly been moved to relate better to the existing complex of buildings.
4. Building 4 is submitted in detail form. The design has been amended following comments by officers and Strategic Committee Members. The floor area remains as previously submitted.
5. Building 5 – This was originally split into 2 smaller warehouse buildings with an element of ancillary office space. However, this current submission removes one of the reduced size hangars, substantially reducing the built form.

The proposal is for:

- 2 warehouse buildings with integrated office space , 1 in full and the other in outline totalling (Building 4 =8460sqm B8 storage and 1, 395sqm B1 office space; Building 5 = 4650sqm of B8 and 700sqm of ancillary office space).
- 2 office buildings (1,395sqm and 2790sqm of B1 use).
- 1 gatehouse building (administrative space, security office and office use 1,600 sqm).
- A total of 25, 855 sqm

The location of each building is identified in a development zone within the layout plan. The proposal also involves provision for a new roundabout access from the A429. Provision is to be made for around 250 car parking spaces on site and it is anticipated that approx 250-300 new jobs will be created when fully developed and occupied.

The application is accompanied by a Planning Statement which indicates that it is an aspiration to develop renewable forms of energy at the site including an element of renewable energy in both heating and power systems.

6. Planning Policy

North Wiltshire Local Plan 2011: Policy C3 (general development control criteria), Policy NE15 (landscape character of countryside), Policy NE20 (redevelopment of redundant MoD sites), BD5 (Rural Employment); HE4 (Development or alteration affecting a listed buildings).

Wiltshire Core Strategy: Core Policy 37 (relating to the redevelopment of redundant MoD sites), Core Policy 41 (Sustainable Construction and low carbon energy), Core Policy 58 (Ensuring the Conservation of the Historic Environment), Core Policy 51 (Landscape), Core Strategy Policy 60 (Sustainable Transport) .

The National Planning Policy Framework (hereafter referred to as NPPF) supports sustainable development in relation to building strong and competitive economy states that *“significant weight should be placed on the need to support economic growth through the planning system”* (para 19). There are no explicit policy considerations provided in relation to determining planning applications for economic growth in the rural areas. However, para 28 does require development plan policy to *“support the sustainable growth and expansion of all types of businesses and enterprise in rural areas, both through the conversion of existing buildings and well designed new buildings”*.

In determining planning applications, the NPPF requires local planning authorities to take account of the desirability of sustaining and enhancing the significant heritage assets, with greater weight given to the asset’s conservation. It recognises that significance can be harmed or lost through development within the setting of the historic asset and requires that any harm or loss has clear and convincing justification (Paras 131-132).

7. The Application Process.

The application was submitted in June 2013 following the Committee’s decision to refuse application 11/01531/FUL. Throughout this former application and the discussions held since the submission of this application, officers, in particular, stressed a strong policy presumption against the development on its unsustainable location, size, form and design in relation to the listed buildings and open landscape.

It has been stressed that the only possible way forward for such a significant increase in built form with significant policy objection would be for exemplar sustainability credentials, together with a design more in keeping with the scale and setting of the Grade II listed hangars, which reflects the site’s former use for the MoD. This was stressed by way of meetings prior to the submission of the 2011 application which were held to discuss possible designs, giving examples of buildings which had faced some of the problems faced by the applicant and remaining open minded throughout the process to a possible solution.

No formal pre-application advice was sought on the revisions now being considered..

In support of the application the applicants have submitted the following documents:

- Plans elevations and artistic impressions.
- Design and Access statement.
- Landscape Visual Impact Assessment
- Transport Assessment.
- Statement of Community Involvement (not updated since previous submission)
- Desk based Archaeological Assessment.
- Ecological Survey Report.
- Employment Travel Plan.
- Phase 1 Habitat Survey.
- Planning Statement.
- Bat Survey.
- Botanical Survey Report.
- Tree Survey.
- Outline Drainage Strategy.

All documents are available on the file and inform many of the consultation responses.

8. Consultation

Spatial Planning Officer. Comments form basis of “Principle of Development” section below. However they can be summarised as:-

1. The proposals represent a substantial increase in business floorspace at the established Kemble Business Park, with an estimated 250-300 jobs created and the ability of the premises to meet the needs of an existing business on site and new investors. The applicant considers that there are no alternative sites to meet these needs.
2. The Planning statement states that “*The application proposal is considered to be sustainable development in that it provides new employment land in a location suitable for the indigenous growth of established local businesses*”. The Core Strategy sets out how sustainable development is defined and this site, for planning policy purposes is in open countryside, where new floor space is considered generally unsustainable and therefore restricted. Whilst National Policy recognises the economic needs of rural areas, this needs to take account of the scale and type of development.
3. The applicant attempts to justify the proposal in accordance with the wider strategic interests of Wiltshire, stating that it is a Strategically important site. Although the site is in employment use, it is remote from where additional employment land is focussed over the plan period and has not been identified as a Principal Employment Area within the Core Strategy.
4. It is unclear how the proposal would relate to the priority sectors identified in para 6.10 of the Core Strategy, particularly as no end users have been identified.
5. It is recognised that the Transport Assessment has been updated since the 2011 application, with a revised junction capacity for the A429/A433 junction and proposed site access roundabout and a multi modal assessment using up to date TRICS data. However, the Travel Plan has not been enhanced and it is still not clear whether the proposal has the ability to change travel patterns to more sustainable modes.
6. The applicant places significant weight on the proposed development securing the retention of existing employers in Wiltshire, but there is little evidence within the application and the proposals could result in new speculative development. Speculative development could undermine deliverability of strategic employment sites, contrary to Core Policy 34 and would conflict with sustainable development principles. In the absence of any clear evidence, it is impossible to justify that the development is in the wider strategic interest of Wiltshire. In addition there is a lack of information about the sequential approach and impact assessment for B1 office floorspace.
7. Despite restrictive national and local policies, it could be argued that as the site is already established in employment, that some additional employment at the site may be acceptable. However, this would depend on the scale and sustainability, including positive improvements on site that would secure a genuine change in travel patterns to modes other than cars. The impact on the historic environment is also an important consideration, given the listed buildings on site.
8. Whilst the aspiration is for BREEAM excellent, in terms of renewable energy there appears to be limited information provided about what renewable energy sources will power the building.

In conclusion, despite the changes (including a reduction in floorspace) the conclusion is the same as the previous application. It is still considered that the proposal would be contrary to the extant and emerging development plan, as well as national planning policy that would lead to a significant expansion of employment floorspace in a countryside location that is remote from settlements and cannot be regarded as sustainable development.

Whilst undoubtedly the proposals will secure new jobs in the area, based on the existing patterns of employees working on the site, these would be likely to be drawn from a wide area and mainly outlying towns where development plan policies seek to provide new employment. The proposals have merit in their approach to sustainable construction and proposed use of renewable energy. However, this does little to outweigh the concerns raised in terms of the need to secure a sustainable pattern of growth and harm to listed buildings.

The robustness of the evidence underpinning the application is insufficient to provide confidence that the proposals relate to the genuine expansion and/or retention of existing businesses on the site helping to retain these businesses within Wiltshire. In the absence of the ability to manage the end user the proposals could very well result in speculative development.

Highway Officer - Reiterates his previous comments which were: The Transport Assessment is acceptable insofar as those sections relating to Wiltshire are concerned. The new junction at the access will be required prior to the commencement of any development on the site and he is satisfied that there will be no significant adverse effect on the highway network within Wiltshire. Gloucestershire Council will need to comment on the effect on the A429/A433 junction.

On a policy basis the site is located within open countryside with minimal public transport provision and in the current financial climate even that is in doubt. Although a minibus shuttle service is proposed, this is only guaranteed for 3 years and will only effect a minimal amount of journeys. There is little scope for cycling and the development will be largely car dependent. It is an unsustainable location.

On a more detailed point the landscaping to the middle of the roundabout is not acceptable. The future maintenance liability, which the developer would be expected to pay. For effective roundabouts the drivers must be able to see, not only approaching vehicles, but also their direction indicators. He recommends refusal on sustainability grounds.

Senior Conservation Officer – Objects strongly and her comments form the basis of the section on the impact on the listed buildings, the Heritage Asset and the character of the area in general, but can be summarised below:

1. There are several listed buildings on the site: Building M3 (type C) on the right hand side when entering the site; Buildings M1 and M2 (Type D) a pair of hangars set behind M3 on the right hand side; Building 6 (The water tower and works service buildings) which is a focal point at the end of the main avenue; Site A (lamella Hangars) a pair of hangars set some way to the west of the entrance; Site E (Type L hangars) a pair of hangars set some way to the south west of the entrance, not far from site A. Some of these building types are seen on the Cotswold side, plus a 5th variation Type E.
2. Kemble, by virtue of its range of 5 different hangar types including the structurally advanced parabolic form is the most outstanding and strongly representative of the 24 Aircraft Storage Units planned and built by the Air Ministry for the storage of vital reserve aircraft in the period 1936-1940.
3. Apart from the cluster of 3 hangars at the entrance, the hangars were in pairs around the airfield in a dispersed form to provide further protection from air attack.

4. The proposals are to erect building 4 adjacent to the 2 Lamella Hangars on site A incorporating bunding to reduce the built form.
5. It is unclear why the new roundabout requires the curvature of the site entrance road, which as a straight road has the listed water tower as its focal point. Widening the avenue means that the wide verges in front of the buildings will be cut back, with resultant harm to the setting.

Council Landscape Officer reiterates that his comments remain as previously stated and these were: A policy background to his comments which principally relate to the submitted information under 'Landscape Character and Visual Impact Assessment, prepared by Nicholas Pearson Associates (NPA) March 2011. On the whole he concurs with the NPA report. However, he stresses that the resulting effects from the proposed lighting of buildings (15%) minimum rooflights across the curved roof of building 4, light columns at road junctions and on roads, glare and reflection from a large array of solar panels and the effects of any illuminated signage has not been included. Given the scale of the proposed development, these could generate significant additional landscape and visual impacts within the rural landscape and upon the historic setting of the listed buildings.

In detail the local characterisation work makes inadequate reference to the wider significance and localised context in relation to the heritage assets on site ie The distinct hangar pairings and the importance of the open ground between. The size of the buildings and their siting in close proximity with the hangars causes individual buildings to visually coalesce into much larger clusters of built mass which will be unduly dominant in the rural scene.

The existing trees on site have been evaluated and surveyed. 83 out of the 160 on site are to be removed. The survey identified 6 as category 'R' trees and it is assumed that the remaining 77 are to enable development in zone A1 & A2. Some of the trees are assigned Category C, however, the majority are B1 and B2. The existing trees on site seem to suggest that the group to the south side of M3 contain some fine trees, which are a significant group of predominantly B1 trees. They collectively provide an important mature greening and screening function to the cluster of utilitarian buildings and reduce the dominance of the M3 hangar side elevation within zones A1 and A2 along the existing access road. As many of them should be retained as is possible as they make a significant contribution to place making.

Trees in other parts of Zone A1 & A2 are generally of lesser quality.

As it is difficult to understand which trees are proposed for removal further information should be sought.

It will take longer than the 15-20 years proposed for the mitigation planting to screen the development. Any permission should include a tree protection plan.

Council's Environmental Health Officer has no objections but states that as there is potential for land contamination to be present from historical uses any permission should contain a condition to undertake investigation. He also requires a lighting scheme and a noise condition.

Council Ecologist – The currently proposed scheme is similar in terms of general layout and associated ecological impacts, which will involve the demolition of some buildings supporting bat roosts and loss of calcareous / neutral grassland habitats. Given the managed nature of the site I'm satisfied that the site is unlikely to have changed significantly since the last bat survey was carried out and would not require an update. I am therefore still satisfied that permission may be granted in accordance with relevant policies and legislation subject to conditions requiring:

- Pre-commencement submission and approval of an Ecological Management Plan for the site
- Implementation of bat mitigation measures set out in the submitted bat report

County Sustainable Growth Team – Core Strategy policy 41 requires large developments to submit a Sustainable Strategy and although the Core Strategy is not yet adopted this policy should be given weight. Core Policy C1 of the adopted North Wiltshire Local Plan 2011 is the current development plan policy.

The Design and Access Statement submitted with the application refers to high sustainability credentials and have submitted a BREEAM pre-assessment which just makes it into the excellent category.

The use of a hybrid planning application should not distract planners from the requirement to make submitted developments sustainable. There is a clear requirement under Wiltshire Core Policy 41 for a detailed energy strategy and a broader requirement under North Wiltshire Policy C1 to demonstrate energy conservation measures. Since the architects are, by their own admission, experienced in the design and delivery of sustainable and low energy buildings it should not be impossible for them to demonstrate precisely how Building Four will satisfy the BREEAM requirements.

The minimum carbon emissions reduction of 25% can be demonstrated by a Simplified Building Energy Model (SBEM) calculation. Furthermore, a renewable energy strategy for Building Four must be submitted.

As an example, it is noted that there is a substantial south facing roof but only six 90 sq m photovoltaic arrays are shown on the roof plan while the access statement maintains that this is "a large array". 540 sq metres of pv panels would equate to 330 panels (at 1.6 m² per panel) generating at best an annual yield of 61,000 kwh. While this is a substantial output it is trivial compared to the building's 10,370 m² footprint and cannot be considered exemplar. CIBSE Energy Benchmarks GuideTM46 (by which EPCs are calculated) demonstrates this further.

A typical warehouse electrical benchmark is 35 kWh/m² (with a further 160 kWh/m² for fossil fuels used in space heating) while an office electrical benchmark is 90 kWh/m² (with 120 kWh/m² for fossil fuels). This, using the floorspace figures (8640 and 1395 m²) submitted would give an annual electrical benchmark based energy requirement alone for the building of 434,925 kWh (and 1,549,800 kWh space heating requirements). The photovoltaic panels would therefore generate just over 7% of the buildings electrical requirements. If the building is to obtain the target "A" (0-25) rated energy performance certificate a substantially higher renewables figure would be necessary.

The space heating requirement is more considerable and the design addresses this partially with references to U values below Part L building regulation requirements and low carbon innovations such as trombe walls. Furthermore it suggests that the warehouse will only require “trace heating” against frost. Given the architects’ experience in sustainable building it would be better to quantify this in kWh.

This is essential given the statement that Building Four is to set the standard for the other buildings on site. Although these are submitted in outline, no overall energy strategy has been discussed. This should be explored as a condition.

The proposal demonstrates an understanding of the energy requirements of low energy building by an experienced low carbon practice but a full energy strategy must be submitted and approved in writing as a condition for the detailed application.

Environment Agency comments are awaited, but they did not object to the previous application.

Wessex Water raise no objections but as the water and sewerage supplier note that they do not supply mains water to the site.

Council’s Drainage Engineer states that if the detailed design were to keep the foul and surface water discharges separate and attenuated on site before being released into the ground and the infiltration rate testing proves to be favourable and the attenuation storage be designed to hold everything over the Greenfield Discharge Rate and up to the 1:100 storm event plus a climate change allowance there would be no objections.

Cotswold District Council has no objections.

Gloucestershire County Council States that they acknowledge the Transport Assessment’s calculations that the proposal will lead to an increase in trip generation and the need for improvement works at the A429/A433 which can be conditioned in any approval as set out in Appendix 15 of the Transport Assessment. (ATL – this would need to be by way of a legal agreement).

Kemble and Oaksey Parish Councils comments are awaited.

Crudwell Parish Council broadly support the proposal although refer to traffic slowing that can be gained via the new roundabout. There are concerns about the increase in HGVs using the site and the possibility of 24 hour usage.

Highways Agency’s comments are awaited, but they did not object to the previous application.

The Council’s Economic Development Team supports the application as it will allow businesses to expand on the site and attract new businesses creating new local jobs. The proposal meets with the requirements of Policy Bd5 of the North Wiltshire Local Plan 2011 in the re-use of existing buildings and the provision of new buildings which are well related to the site. Core Policy 35 of the Emerging Core Strategy says that it is important to retain existing employment uses to maintain the choice of sites for employers and allow business expansion.

8. Publicity

The application was advertised by site notice and neighbour consultation.

3 letters of objection have been received. Summary of key relevant points raised:

- Surface water flooding due to the increase in hard surfacing.
- The sewerage system is privately owned – is it capable of dealing with the increase?
- The bunds are insufficient to shield the residential properties.
- Landscaping will be important – see size of bunding
- In accurate ownership plans.
- Potential loss of boundary trees.
- The site is not sustainable.
- Increase in noise.
- Light intrusion into open countryside.
- Local Plan policies point employment towards major settlements.
- There are vacant buildings on site which should be used and no justification for them not being used has been put forward.
- The ecological report is superficial
- Lack of sustainable transport options to the site. The sustainability transport document suggests a Temporary shuttle bus service, but there is no mention of how staff will be compelled to use it, nor what will happen after the 3 years.
- Need to impose speed limit at roundabout.
- The line of conifers behind The Firs should remain.

Cotswold Airport has not commented on this application, but previously stated:

- *They received no direct contact about the proposal. They could have supplied a matrix of maximum build heights together with advice on materials, lighting etc.*
- *The airport's functions and associated development are in fact safeguarded by the relevant CDC development Plan policy.*
- *It is acknowledged that buildings exist, but safeguarding must consider long term strategic policies of the airport. The proposal has failed to take into account the operational requirements of the airport.*

They also share those objections stated above.

Cotswold Airport has also stated that they believe that the building does infringe the transitional slope of the runway and it would infringe even more if the ground level of the building is raised as shown. This could be detrimental to their business and affect their ability in the future to install and provide an instrument approach for aircraft. They are also concerned about wind curl on landing aircraft that may be produced from a building so close to the runway.

9. Planning Considerations

Principle of development & policy setting

Policy weighting

The National Planning policy Framework and the North Wiltshire Local Plan (NWLP) 2011 run in tandem with each other, where they are not in conflict. The NWLP is the adopted plan for the determination of this application.

The Wiltshire Core Strategy has now been through its Examination in Public and the Secretary of State's report is awaited. This is an advanced stage in its production and, therefore, considerable weight should be given to the emerging policies within core strategy where there are no significant outstanding objections to that policy.

Application of policy

In planning policy terms, the application site is located in the open countryside although part of the site is an established employment site. The nearest settlement is Kemble, some 1.5 km to the north.

The proposal is for the following in hybrid form (i.e. partly full, partly in outline):

- 2 warehouse buildings with integrated office space, 1 in full and the other in outline totalling (Building 4 = 8460sqm B8 storage and 1, 395sqm B1 office space; Building 5 = 4650sqm of B8 and 700sqm of ancillary office space).
- 2 office buildings (1,395sqm and 2790sqm of B1 use).
- 1 gatehouse building (administrative space, security office and office use 1,600 sqm).
- A total of 25, 855 sqm

The application is accompanied by a Planning Statement, which states that a high standard of sustainable construction is proposed to reduce energy input and that the proposal will promote the development of renewable forms of energy on site. A number of options are being explored.

The key policy criteria are set out in the Planning Policy Section above.

The proposal represents a substantial increase in floorspace at Kemble Business Park, with the potential to create 250-300 jobs in realistic terms (although there is potential for up to 809). The proposed development will provide new premises to meet the needs of existing businesses on the site, as well as providing for new businesses to locate on the site. The site, which is a former MoD site lies in open countryside, some distance from any centres of population, with very poor public transport links, where the development of new floorspace is generally considered unsustainable in principle.

The planning policy context is set out below:

- The site lies within open countryside where policy BD5 of the NWLP 2011 state that development proposals for business development will be permitted where they..... "iii) Involve the limited expansion or replacement of an existing premises, where the development would be more acceptable and sustainable than might be achieved through conversion...". The development is for 25, 855sqm additional floorspace, which cannot be considered to be limited.
- Policy NE15 of NWLP 2011 relates to the landscape character of the area and will only allow development which does "not adversely affect the character of the area and

features which contribute to the local distinctiveness. i) The setting and relationship between ...buildings and the landscape; iv) the topography of the area avoiding sensitive skylines, hills and not detracting from important views” The application site is prominent from several locations but very visible as rising ground driving from south to north on the A433. The landscape is currently open with hangars visible but their very form makes them easily absorbed into the landscape and skyline.

- Policy NE20 of NWLP 2011 relates to the re-use of military establishments in the countryside and permits the change of use or conversion of buildings to B1 and B8 uses where i) the proposal involves removal of unsightly buildings; ii) The proposal is in a form, bulk and general design in keeping with the local area. Proposals for the development of the open areas will not be permitted.
- Policy HE4 states that development affecting a listed building will only be permitted where it preserves or enhances the building, its setting and any features of special architectural or historic interest that it possesses. The section below will substantiate this reason.
- Wiltshire Core Strategy Core Policy 37 states that redevelopment, conversion or change of use of redundant MoD sites and buildings will be supported provided that they are well related to an existing settlement in terms of both location and scale. Sites that are remote from settlements should only be considered where the existing buildings and infrastructure on site are suitable for redevelopment, conversion or change of use. The focus will be on employment led development and other uses should be determined through a master planning approach.
- Wiltshire Core Strategy Core Policy 51 deals with landscape and requires that development will not have an adverse effect on the landscape character, while any negative effects must be mitigated through sensitive design and landscape measures. Proposals should be informed and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessments and any other relevant assessments and studies. The Council’s Landscape Officer has commented on the impact of the development on the ‘special’ character of the area and how it would alter the open character causing the built form to coalesce.
- Wiltshire Core Strategy Core Policy 58 encapsulates how development should protect, conserve and where possible enhance the historic environment. This is dealt with in the section below.
- Wiltshire Core Strategy Core Policies 60 and 61 considers sustainable transport and the Council’s promotion of it by promoting alternatives to the private car. The proposal does not achieve this aim in that it promotes use of the private car as little public transport or alternatives are available and those suggested by the applicants are weak and may have limited longevity.
- Policy T1 of NWLP 2011 is relevant as it looks to minimise the need to travel and promote developments which are sustainable in their location and choice of travel modes.
- Policy T2 of NWLP 2011 refers to travel assessments and travel plans to identify the impact of development and travel plans to set out sustainable forms of travel to and from the development.

Effect on listed buildings on site and the Heritage Asset and general character of the area

The site was formerly open fields with a few farms until the 1930s when it was developed as an airfield. There are low lodge buildings with a main gate off the A429, a drive leading into the site with a listed water tower at the head of it. Mature trees line the entrance drive and the buildings are set well back from the hard surfaced area, giving visual width to the route. The hangar buildings are grouped by type, in twos and threes on the site, with careful spacing between the grouped buildings.

Specific comments in relation to each of the proposed buildings follow:

Building 1 –

The existing entrance buildings are single storey brick with a clay tile roof and very little glazing. They very much set the scene for the buildings behind, but remain unobtrusive. The proposal is for a very much larger building, set forward of the existing building line (towards the A429) and although only in outline, the indicative drawings show an improved design, which better reflects the military setting. There is still concern that the building projects forward to the roundabout and will be highly visible to road users, particularly those travelling south.

Buildings 2&3 –

These buildings have been moved from their original position on the open ground to the north of the site. Their revised location is, for building 2 on land in the place of existing buildings to be demolished to the south of the existing business park. Building 3 is on open land to the south west of the existing group of buildings forming the business park.

Both buildings are in outline, but indicative drawings have been submitted indicating 2 and 3 storey buildings of modern design. The illustrative master plan indicates earth bunding to the south of the buildings but no details of levels have been submitted. No visuals to allow the authority assess the impact of significant buildings in the existing roofscape have been submitted so that it cannot be assessed as to how such buildings will relate in scale to the listed hangars and water tower and the general character of the existing building.

Building 4 is the aspect of the built form which is in full and as such details of the building have been provided. The building will measure 113m x 75m with a 100m x 10m office addition to the north. The building is to have an eaves height of 11.2m to eaves and a curved roof with a maximum height of 12.6m. The existing parabolic hangars rise to a maximum of 12m. The building has skylights to give 15% coverage, maximising daylight levels.

The south elevation is used for access and includes 18 sectional-overhead doors for loading, 6 of which are accessed via excavated ramps. The loading area is covered by a canopy stretching the full length of the building.

The lower levels are masonry blockwork with a continuous line of glazing above which will help reduce the need for artificial lighting. The offices are clad principally in timber and the sides in a composite system.

The roof rises in an arch and falls to meet grass bunds at either end. The opportunity to incorporate a grass roof is exploited by carrying the rise of the bunds over the line of the office roof. Plant is located beneath the roof within a louvred enclosure.

The submitted plans do not show the building in the context of the listed hangars which are 60m to the south west and 90 m to the west. However, the plans do show that the hangars measure 86m x 52m. Their overall height is relatively similar, but due to the overall scale and architectural style of the building, its impact is considered to be unacceptable.

The impact of building 4 in the open landscape will be huge. Whilst some bunding is proposed, this arguably introduces an alien feature into what is an open and gently sloping site. In any event, bunding cannot possibly fully integrate this vast building into the open landscape.

The building shows a canopy to the southern elevation at a height of 6.2m and a depth of nearly 6m. This will be a significant structure of a highly visible nature on the southern elevation which is the most publicly visible.

The proposed building, so close to the grade II listed buildings, will significantly and adversely affect their setting, so that they are dwarfed by a modern building which bears little resemblance to their architectural style. There are large and raised glazing areas which will illuminate the building when viewed from vantage points in the wider countryside. The southern loading bay will need to be light during the winter months, which will add to the overall impact of the building. The existing hangars have little external lighting and certainly not of the scale now proposed.

Building 5A and 5B have been reduced so that now only one of the buildings is proposed. The design shown in the indicative plans (they are in outline) relates better to the grade II listed hangars to the south and south west, but it will "clutter" the open setting of these hangars to the detriment of their setting, destroying the twinning pattern of the hangars that was so important in the war years.

The building would be on an open area of land and therefore directly in conflict with policies C3, NE15 and NE20 of NWLP 2011 and Wiltshire Core Strategy Policies 37 and 41.

Access

Wiltshire Highways Engineer is happy with the proposed junction alterations and the introduction of a roundabout subject to some modifications. He is satisfied that the local road network can accommodate any additional traffic.

Gloucestershire Highways are happy with the proposal subject to some improvements to the A429/A433 junction. (S106)

Design, appearance and layout

Throughout the pre- application and application discussions the agents/applicants have constantly been asked to ensure that the buildings they propose relate in scale and form to the buildings which exist on site.

The only building for which full permission is sought is building 4 to the north of the site. This building is designed as a rectangular building with an overall height of 12.6m (a reduction of 1.4m) and a length of 113m and depth of 75m, with a further projection on the northern side of 100mx10 and a projecting canopy on the south side of 6m at a height of 6m. The south elevation has the 16 loading bays which will be lit and will be highly visible in this open landscape from several public vantage points but most notably the A429 and the land which links the A429 to the lane immediately to the south.

The current grade II listed hangars are much smaller in scale and have curved bitumen roofs which have a dark matt surface, which helps absorb any impact they may have, into the landscape. The agents have supplied some comparison elevations to try to give comfort about the impact of the building in the landscape, especially when compared to the nearby listed buildings. Whilst the reduction in height of the proposed building 4 is welcomed, it is still a vast building set amongst other smaller more functionally architectural and with its requirement for external lighting (and glazing to allow natural daylight, is still considered to be a gross intrusion into the open countryside and on which there is no policy support.

Other matters

The airport has previously objected to this building (and potentially the others) because of its size and form. Whilst Safeguarding is not a planning reason for refusal, the practicality of building structure 4 is cast into doubt because of it.

10. Conclusion

Throughout the process the agents have been advised that there is a policy presumption against the proposal because of adopted and emerging planning policies and its highly unsustainable location, as well as the scale of the proposed development. Despite the restrictive planning policies at both national and local level, it is recognised that the site is an established employment use and the proposal would have positive economic benefits in terms of job creation. As such, some additional development at the site might be acceptable to help safeguard existing businesses on site. However, due to the rural location of the site there is a limit to what could be considered to be a reasonable level of increased floorspace. Furthermore, a robust Travel Plan supporting access by sustainable forms of travel would be important to encourage and support access by modes other than the private car.

While it is acknowledged that the re use of this former MoD site for employment uses has helped safeguard and protect historic buildings on the site, the application does not offer any additional benefits that would help secure their survival in the longer term that may help offset the harm to listed buildings. In fact their long term future may well be compromised by this application as they may well be left to deteriorate without targeted maintenance investment. That said, without further investment it could be argued that only the current amount of investment will prevail. What is tangible is the effect that the buildings will have upon the listed buildings, which as per the arguments set out above, is not considered to be acceptable.

The applicant has been advised that the sustainability credentials must be so exemplary that an argument can be made to outweigh other concerns. Officers do not consider that this is the case with this application. The proposal does have positive and enhanced sustainability credentials, but these are not of a magnitude to outweigh other concerns. The

prospect of securing approx 300 jobs is to be welcomed, although no end users have been identified. Notwithstanding this, the prospect of such jobs cannot be considered to outweigh the issues set out above.

In addition to this, although only building 4 is in detail, the sketches that have been submitted for info of the other buildings do not relate in architectural style to those on the site and are of significant scale, which even in principle, are not considered to be appropriate.

Building 4 is of significant scale and it has not been sufficiently demonstrated that it will not overshadow and dominate the existing listed hangars on site.

11. Recommendation

The recommendation is for REFUSAL for the following reasons:-

- 1) The proposal is located within open countryside and on a Greenfield site within a former MoD site. The proposals are not considered to be limited expansion or redevelopment of an existing premises; are not well related to any existing settlements and are considered to be remote, involving development of an open area. The proposals are thus considered to conflict with policies BD5 and NE20 of the North Wiltshire Local Plan 2011 and Wiltshire Core Strategy Policy 37.
- 2) The proposals lack sufficient detail to ensure that they preserve or enhance the setting of the Grade II listed hangars on site and are thus contrary to Policy HE4 of the North Wiltshire Local Plan 2011, Wiltshire Core Strategy Policy 58, section 12 of the National Planning Policy Framework 2012 and the guidance given in S.16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 3) The proposals are set within an open landscape and of a scale, massing and design that is considered to have a detrimental impact on the "special" character of the area and its openness, causing the built form to coalesce, contrary to policy NE15 of the North Wiltshire Plan 2011, Wiltshire Core Strategy Policy 51 and Section 11 of the National Planning Policy Framework 2012 on conserving and enhancing the natural environment.
- 4) The proposal is sited within a remote location with poor public transport facilities and the sustainability proposals put forward by the applicants are considered to be insufficient to outweigh the harm caused and thus the development is considered to be contrary to Policies T1 and T2 of the North Wiltshire Local Plan 2011 together with Wiltshire Core Strategy Policies 60 and 61 and advice within the National Planning Policy Framework 2012 about delivering sustainable development.