# **REPORT OUTLINE FOR AREA PLANNING COMMITTEES**

Date of Meeting	18 February 2015
Application Number	14/10601/FUL
Site Address	Chelworth Lodge
	Cricklade
	Swindon
	Wiltshire
	SN6 6HP
Proposal	Erection of 7 Employment Buildings (B1 & B8 Uses)
Applicant	International Exports UK Ltd
Town/Parish Council	CRICKLADE
Ward	CRICKLADE AND LATTON- Cllr Jones MBE
Grid Ref	407711 192892
Type of application	Full Planning
Case Officer	Sam Croft

# Reason for the application being considered by Committee

Applications called in by Councillor Bob Jones because of its conflict with the Wiltshire Core Strategy and National Planning Policy.

# 1. Purpose of Report

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

# 2. Report Summary

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

- The principle of development;
- Parking & highways issues;
- Flood risk & drainage;
- Impact to landscaping & trees within the site;
- Ecological impacts; and,
- Public Protection.

Cricklade Town Council objects to the application. No letters of objection were received from the public in respect to the development.

# 3. Site Description

The site is located outside of the settlement boundary for Cricklade as defined in the Proposal Maps that accompany the Wiltshire Core Strategy. The local area is characterised by industrial ribbon development, already located outside defined settlement boundaries along rural roads. The site is located approximately 500m away from the existing industrial estate at Chelworth.

The site in question was subject to planning permission for 10 residential traveller pitches and associated works (N/10/01657/FUL) which was granted at appeal in 2011. No traveller pitches have been implemented.

# 4. Planning History

N/02/02339/FUL New access road to serve existing industrial premises.

- N/03/00308/FUL New access road to serve existing industrial premises.
- N/04/01071/FUL Formation of entrance and access track to industrial area.
- N/04/02908/ENF `Appeal against enforcement carrying out of engineering operations comprising the excavation of soil, the tipping of hard surfacing materials to provide roadways and hardstanding areas.
- N/04/02138/ENF Appeal against enforcement earthworks and creation of access.
- N/05/01992/CLE Use of Hardstandings, Tracks and Access for the Storage of Vehicles and Trailers in which Various Materials have been Stored.
- N/08/00621/COU Change of Use of Land to Accommodate Sixteen Gypsy Pitches and Associated Works.
- N/09/00393/FUL Change of Use of Land to Accommodate 16no. Gypsy Pitches and Associated Works.
- N/02/02339/FUL New access road to serve existing industrial premises.

N/03/00308/FUL New access road to serve existing industrial premises.

# 5. The Proposal

The application seeks to develop the site to provide 7 individual starter type industrial units. The proposal seeks to allow for a mixed class B1 or B8 operation across the site. Each unit will have an internal floor area of approximately 94m2. A quarter of the ground floor is shown with a mezzanine floor. The buildings will have a 5m high roller shutter door for access and deliveries from HGVs. The buildings will also have a separate pedestrian door to the side of this main entrance set in a glazed screen.

The new buildings are proposed to be grouped into a terrace of three units and two semidetached units and are orientated around the proposed vehicle turning head, off which each unit will have allocated parking spaces. The buildings face into the site and the terrace of three units presents its blank rear elevation to the road past the site. The distance between the rear of the proposed building and the road will be approximately 19m.

It is proposed that the buildings will be constructed from fair faced concrete blockwork at ground level with powder coated corrugated metal sheet cladding above. The roof will be

<sup>&</sup>lt;sup>1</sup> APP/Y3940/A/10/2135171

similarly covered, together with a 105 inclusion of regularly spaced translucent sheet to allow in natural light. The cladding is expected to be a dove grey colour; however, the precise finish would be decided by condition if approved.

Access to the new development is to be taken from an existing access point, which is to be modified, and will serve each of the buildings individual from a shared turning head. The turning head has been designed to accommodate large HGV manoeuvring. There is also access from the central turning area to the proposed parking spaces for each unit. These are to be augmented by a communal cycle and/or motorbike store positioned alongside one of the units.

# 6. Local Planning Policy

National Planning Policy Framework Sections 1, 6 and 7

**Planning Practice Guidance** 

Wiltshire Core Strategy (Adopted January 2015) CP1 Settlement Strategy CP2 Delivery Strategy CP3 Infrastructure Requirements CP34 Additional employment land CP48 Supporting Rural Life CP51 Landscape CP57 Ensuring High Quality Design and Place Shaping CP60 Sustainable transport

# 7. Summary of consultation responses

<u>Cricklade Town Council</u> – This application relates to an area of land that has already been granted permission at an appeal in 2010 for 16 Gypsy pitches. This permission has never been implemented due to flooding concerns and inadequacy of adjacent culvert. It appears from the associated paperwork that this has been resolved and when work is completed it will reduce the flood risk to neighbouring properties.

The land in question can only be described as poor, largely due to lack of any maintenance or use. Notwithstanding the Gypsy Site permission, and as this has not been implemented, we are in fact considering a development in the open countryside on what was previously agricultural land with yet a further expansion of the Industrial area in 'ribbon type' fashion towards Ashton Keynes.

The proposal is for 7 Employment Buildings of the type now common in the Chelworth area. It uses a very small proportion of the field and will without doubt lead to further applications for further Industrial use. This will also generate more slow moving traffic emerging onto the B4040 at the crossroads.

It has long been a concern of this Council that the whole Chelworth area is expanding in an unplanned and uncontrolled fashion. The application talks of Wiltshire Core Strategy regarding provision of additional employment development. As far as we are aware this area has not been designated for such use, and it is anticipated that the Neighbourhood Plan which is currently in development will be looking to reduce the impact of this area on HGV traffic in the Town, not expanding business use in the vicinity.

The agent considers that the site is sustainable and uses the Gypsy Site permission as an example of sustainability. It is unlikely that a Gypsy Site would generate HGV movements so the comparison is not reasonable. These units are designed specifically for this purpose.

Cricklade Town Council therefore strong objects to the proposal. However, if permission is granted then a condition should be sought to ensure that remedial work on the culvert is completed before any development takes place to ensure that the flooding problem does not reoccur.

<u>Highways</u> – The site is situated in what is generally open country side, remote from services and with very poor public transport facilities with no journey to work opportunities In view of this I consider that an objection on highway sustainability grounds is appropriate.

Landscape – The Landscape Officer set out that the application should be informed by a simple landscape and visual appraisal, prepared in accordance with industry best practice ('Guidelines for Landscape and Visual Impact Assessment -Edition 3 (GLVIA 3)') the scope of which only need be proportionate to the scale of development proposed. I suggest this is necessary in order to ensure the LPA can understand the potential change effects to landscape character and the visual context resulting from further speculative incremental urban development in this area of countryside. The appraisal should consider the issue of cumulative effects of new development with existing development and should also be used to inform the basis for an appropriate landscape and visual mitigation strategy. This would typically include recommendations on layout, design and appearance of buildings (e.g. basic massing, orientation, use of materials and appropriate colour finishes etc.) and prescribe how the proposed detailed landscaping scheme would help to integrate new development into countryside, reduce any identified harmful landscape and visual effects and identify appropriate landscape enhancement opportunities. The landscape officer put forward a holding objection pending further submission of a landscape appraisal is justified for development of this nature in countryside. This was communicated to the applicant but the requested information was not forthcoming.

Ecology – No objection subject to a number conditions.

<u>Drainage</u> – The proposed development area will not be affected by the expected flooding from fluvial or even overland flows and therefore there are no land drainage concerns.

<u>Spatial Planning</u> – Object on the basis that the proposal is not compliant with the Wiltshire Core Strategy and provisions in the NPPF.

<u>Wiltshire Fire and Rescue</u> – The nature of the proposal gives reason for this Authority to strongly advise the consideration of an appropriate sprinkler system for these premises.

<u>Public Protection</u> – The proposal is to build seven B1 and B8 Employment Buildings on what is essentially a greenfield site. There are dwellings in relatively close proximity which could be disturbed by light and noise which the Council will look to protect them from disturbance during construction and once the units are in use, should permission be granted.

The Environmental Health Officers concerns about noise are from any external ventilation units and avoiding excessive disturbance for neighbouring properties during construction. Potential noise disturbance from ventilation plant may be dealt with by way of a condition and excessive construction noise disturbance via the hours of construction work. The Environmental Health Officer therefore suggested that condition be attached to the permission, should it be approved, relating to light, noise and construction hours.

# 8. Publicity

The application was advertised by neighbour letter and site notice and no letters of objection were received from members of the public.

# 9. Planning Considerations

# Principle of development

Under the provisions of section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. At the current time the statutory development plan in respect of this application consists of the Wiltshire Core Strategy (WCS) (Adopted January 2015) and the 'saved' policies of the North Wiltshire Local Plan (NWLP) 2011 (adopted June 2006). A number of the NWLP policies continue to be saved to sit alongside the policies of the Core Strategy. These policies will be subject to further review as part of the Core Strategy Partial Review process.

The site in question was subject to planning permission for 10 residential traveller pitches and associated works (N/10/01657/FUL) which was granted at appeal in 2012. No traveller pitches have been implemented.

The site is located approximately 500m away from the existing industrial estate at Chelworth. Chelworth Industrial Estate centres on Braydon Lane and Chelworth Road whereas the proposed development is situated to the north-west, with Malmesbury Road separating the site from Chelworth Industrial Estate. It is therefore not part of the wider Chelworth Industrial area as asserted by the applicant's agents in their covering letter (p. 3). Rather, it is located in open countryside as confirmed in the 2011 appeal decision (paragraph 5). The Wiltshire Core Strategy does not contain an employment allocation for this site.

The site proposed for development also falls outside the adopted settlement boundary for Cricklade as established through Core Policy 1 and Core Policy 2 in the Wiltshire Core Strategy. Core Policy 2 is clear that sustainable development is to come forward within adopted framework boundaries. Exceptions to this can be:

- Additional employment land (Core Policy 34)
- Military establishments (Core Policy 37)
- Development related to tourism (Core Policies 39 and 40)
- Rural exception sites (Core Policy 44)
- Specialist accommodation provision (Core Policies 46 and 47)
- Supporting rural life (Core Policy 48)
- Exceptions which may be relevant in this case are linked with Core Policy 34 and 48.

Wiltshire Core Strategy Core Policy 34 supports additional employment land provision over and above the allocations in the plan provided they meet the requirements in the policy. The policy and supporting text are clear that employment sites are to come forward within or adjacent to Principal Settlements, Market Towns and Local Service Centres, and in addition to the employment land allocated by this Core Strategy, where such proposals are considered to be essential to the economic development of Wiltshire. Proposals serving the strategic interests of Wiltshire may also be supported where they meet respective criteria but form an exception to the general approach. The policy itself is clear that proposals coming forward outside Principal Settlements, Market Towns and Local Service Centres will have to

<sup>&</sup>lt;sup>2</sup> APP/Y3940/A/10/2135171

meet criteria i-ix. The criteria ensure that a consistent approach to sustainable development is maintained.

The proposal is not considered to meet the policy requirements. It is not within or adjacent to any settlement identified in the plan but located in the open countryside. Nor will it support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification. It is therefore inconsistent with criteria i, ii, and iii. It was therefore requested that the applicant provide evidence that the development is essential to the wider strategic interest of the economic development of Wiltshire.

Information provided by the applicant sought to demonstrate that there is an under supply of smaller employment units and that the application therefore addresses the wider strategic interests of the county's economic needs. The applicant set out that not only will the proposal increase employment opportunities generally, but Cricklade, as the nearest settlement, is understood to be one of those settlements with limited employment opportunities nearby and subject to significant outward commuting. The applicant also specifically points out that the Wiltshire Core Strategy seeks to provide the right environment for business start-ups and that the application proposal specifically concerns such small space opportunities and as previously said could be conditioned to maintain the individual units.

With regard to criteria v of Core Policy 34 and the plan's sustainable development objectives the applicant sets out that the site has been previously established as sustainably located relative to Cricklade, as set out in the Inspectors decision relating to the travellers site, and that the development will reduce pressures for outward commuting. With reference to criteria vii of Core Policy 34 they set out that there is an undersupply of smaller employment units in this area, as well as throughout the plan area. Improving the choice of employment space helps start-up businesses and adds local flexibility, in the most needed sector of the economy.

The applicant, as set out above, seeks to make the point that the Inspector who considered the development of the site as a gypsy site concluded that it is sustainably located with regard to access to Cricklade and therefore the associated logic is that it is similarly accessible as an employment site from Cricklade and the surrounding area. However, this decision was taken on the basis of Circular 1/2006 and does not mean that the site is sustainable for all uses. The site is situated in the open country side, remote from services and with public transport facilities with no journey to work opportunities and therefore cannot be considered to be sustainable. Accordingly, the Council do not consider that the conclusion in the Inspectors report with regard to the traveller's site cannot be considered to apply directly to this application.

Despite the case made by the applicant it is not considered that the development would be essential for strategic importance to the Wiltshire economy and therefore is not an exception to the general approach to employment land provision as set out in Core Policy 34 of the Wiltshire Core Strategy. As none of criteria i-iv is met by the proposal, further consideration against criteria v-ix is not required. This conclusion is supported by the Council's spatial planning team.

It is also worth noting that the area to the west of Cricklade has largely developed in a piecemeal fashion, with industrial ribbon developments alongside existing farming businesses and small residential cottages. Planning permissions and certificates of lawfulness granted for industrial uses in the Chelworth Road/Braydon Lane area, outside the formal allocation, BD1 confirm this. Granting permission for employment use in this location would therefore reinforce this type of development which is considered inappropriate in the open countryside.

In conclusion, the proposal does not meet provisions in Core Policy 34 and supporting text.

Core Policy 48, together with Core Policy 34, seeks to support rural life and sets out certain circumstances under which development in rural areas will be supported. Developments covered by the policy relate to:

- Dwellings required to meet the employment needs of rural areas
- Improving access to services and improving infrastructure
- Conversion and re-use of redundant rural buildings
- Community ownership
- New shops

It is clear that the proposal does not fall into any of the above categories. It is a proposal for new industrial units in the open countryside and therefore not supported by Core Policy 48.

The NPPF is clear in paragraph 28 that in order to support a prosperous rural economy, planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. Wiltshire Core Strategy core policies 34 and 48 seek to achieve that. The Core Strategy has been found sound (i.e. consistent with the NPPF, see NPPF paragraph 182) by the independent Inspector who examined the plan, and it therefore adequately sets out the county's plan-led approach to sustainable development in rural areas.

Based on that which is set out above, the proposal is not considered to be compliant with the Wiltshire Core Strategy and provisions in the NPPF.

#### <u>Highways</u>

It is noted that the site was the subject of a previous permission for a Travellers' site and that in connection with that application an Inspector decided that sustainability was not an issue. However that decision was taken on the basis of Circular 1/2006 and does not mean that the site is sustainable for all uses. The site is situated in what is generally open country side, remote from services and with very poor public transport facilities with no journey to work opportunities. The development is considered to be in conflict with Core Policy 60 of the WCS.

#### Landscape

This application is for a new industrial development located outside existing or defined limits of development within a countryside context and will therefore be considered under policy requirements WCS Core Policy 34 'Additional Employment Land'. Core Policy 34 states that development outside of the Principal Settlements will be supported where they:

*'v. meet sustainable development objectives as set out in the policies of this Core Strategy'.* 

*'vi. are consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity.'* 

No landscape or visual assessment or appraisal was submitted to support this application. Therefore Landscape Officer stated that it is difficult to understand how the development proposal has considered landscape policy requirements. This is a countryside location which is changing in an incremental and piecemeal manner and changing into a distinctly urban/industrial area, outside the 'Development Plan' led system. This local area is changing into an urban sprawling mass of industrial ribbon development located alongside and between existing small farmstead holdings and roadside cottages.

In the Landscape Officer's opinion this application should be informed by a simple landscape and visual appraisal, prepared in accordance with industry best practice ('Guidelines for Landscape and Visual Impact Assessment -Edition 3 (GLVIA 3)') the scope of which only need be proportionate to the scale of development proposed. This is deemed necessary in order to ensure that the LPA can understand the potential change effects to landscape character and the visual context resulting from further speculative incremental urban development in this area of countryside. The appraisal should consider the issue of cumulative effects of new development with existing development and should also be used to inform the basis for an appropriate landscape and visual mitigation strategy. This would typically include recommendations on layout, design and appearance of buildings (e.g. basic massing, orientation, use of materials and appropriate colour finishes etc.) and prescribe how the proposed detailed landscaping scheme would help to integrate new development into countryside, reduce any identified harmful landscape and visual effects and identify appropriate landscape enhancement opportunities. It is considered that a holding objection from the Council's landscape team pending further submission of a landscape appraisal is justified for development of this nature in countryside.

Accordingly, the applicant was asked to provide a landscape appraisal justifying development of this nature in the countryside. The applicant responded by stating that the site has been approved for development as a gypsy site and to all intents and purposes the site in question constitutes previously developed land. Accordingly, while they were happy to provide a more detailed and robust landscape scheme by condition they wished to establish the principle of the proposal first. Whilst it is noted that the site was the subject of a previous permission for a Travellers' site this permission was not implemented and is no longer extant. Accordingly, the site is not considered to be previously developed land.

The specific sustainable development objectives related to landscape and design quality are outlined in the requirements of Wiltshire Core Strategy, 'Core Policy 51: Landscape' & 'Core Policy 57: Ensuring high quality design and place shaping'. Development proposals should deliver high quality design and enhance local landscape character and distinctiveness and also biodiversity wherever clear opportunities exist (NPPF Policies 7 & 11). New buildings and supporting infrastructure should be effectively integrated into their setting through sensitive design and use of appropriate materials and finishes. The design emphasis would therefore appear to be primarily on defining an appropriate mitigation strategy for the sensitive design of buildings with proposed landscaping to provide further integration and screening of the proposed buildings, hard standing and car parks to mitigate the adverse landscape and visual effects to identified receptors within the receiving landscape. The NPPF is clear that proposals which are of a poor quality, or fail to incorporate available opportunities for environmental enhancement should be refused.

#### Drainage

A hydraulic modelling assessment to investigate the capacity of the road culvert on the Thames tributary near Bournelake Farm was recently carried out by Atkins, the conclusions of which are set out in the Chelworth C70 Culvert Technical Note (18th December 2014). The modelling undertaken is described within the note, but in summary it sets out that the real threat of flooding comes from the River Thames and the existing culvert does not have much of an impact on the flooding at all. In 1:100 year event water levels vary up and down from the culvert by 219mm whereas with no culvert the difference is 203mm. Therefore whilst there is a flood risk to the land from the river Thames, there would also be a small improvement by increasing the capacity of the culvert.

The proposed development area does not overlap with the expected flood zone with the and therefore the development will not be effected by the expected flooding from fluvial or even

overland flows. Therefore there are no land drainage concerns raised in respect to the proposal.

#### Ecology

An Ecological Appraisal report dated 5th November 2014 by AD Ecology Ltd has been submitted with the application. Section 3.2.2 of this report states "All boundary vegetation and the potential bat roost tree [in the northern boundary hedgerow] will be retained and remain unaffected by the proposed development". According to the ecological appraisal report, the proposed development will be sited within the agriculturally improved grassland, which has limited ecological value. With regard to protected species, the Ecological Appraisal report identifies a mature Ash tree in the northern boundary hedgerow (adjacent to the road) with good potential for roosting bats that would require further survey if it were to be removed (although the exact location of this tree is not provided); potential for nesting birds; potential for reptiles such as Grass snake and Slow worm (in the tussocky field margins and piles of rubble/aggregates); and concludes that the site is unlikely to support great crested newts. Mitigation recommended in the Ecological Appraisal report includes the protection of trees and hedgerows with a buffer zone, a precautionary approach to site clearance with regard to the potential for reptiles and nesting birds, and the provision of new bat roosting and bird nesting features on the new buildings. It is recommended that should permission be granted that an informative be attached to planning consent with regard to the legal protection afforded to reptiles and bats.

The application site boundary shown on the plan submitted with the application on the planning portal is wholly within the field and does not include the field margins or hedgerows. However, the blue line boundary indicating the applicant's ownership is drawn around the whole field along the line of the hedgerows. It is therefore recommend that this application is not considered in isolation to the surrounding habitats and that biodiversity enhancements are provided in accordance with paragraph 118 of the National Planning Policy Framework (NPPF). The covering letter submitted with the application states "a buffer zone to the rear of these buildings measuring approximately 19 metres from the road within which new tree planting is proposed to further diffuse the view of the site, together with other planting around the rest of the site". The Council's ecologist recommends that tree planting should be sensitively located to retain suitable reptile habitat in the tussocky field margins. The preparation of the site before construction should be carried out in accordance with the mitigation recommendations in the Ecological Appraisal report with regard to the possible presence of reptiles, but the field margins should also be retained and managed appropriately. Tree planting to screen the buildings should be designed to retain open, south-facing areas for basking reptiles. This proposal and the future development of the rest of the field provides an opportunity to enhance the hedgerows through appropriate planting and management, and the field margins through appropriate management. A landscaping scheme and a Landscape and Ecology Management Plan would therefore need to be submitted for approval as conditions of planning consent.

Hedgerows should be planted up with locally characteristic, native trees and shrubs such as those that already occur with the existing hedgerows, including Hawthorn, Blackthorn, Field maple, Wild privet, Dog rose, Elder and Goat willow.

The proposed buildings are not suitable for the incorporation of integral bat boxes or bird nest boxes due to their construction with colour coated metal roofing, metal cladding and "fair faced blockwork" below. There are no suitable places for boxes to be erected externally. However, boxes could be erected in suitable hedgerow trees. These trees should be identified by a professional ecologist and their exact location shown on a plan.

#### 10. Conclusion

The development proposal cannot be supported as it would constitute unsustainable development in the open countryside in the context of the WCS and the NPPF. The proposal is not within or adjacent to any settlement identified in the plan and is located in the open countryside, nor will it support sustainable farming and food production. It is therefore inconsistent with criteria i, ii, and iii of Core Policy 34 of the Wiltshire Core Strategy. In addition, it is not considered that the proposal would be of strategic importance to the Wiltshire economy, and therefore does not qualify as an exception to the general approach to employment land provision under criteria iv of Core Policy 34. In addition the proposal does not fall into any of the circumstances set out in Core Policy 48 under which development in rural areas will be supported.

The proposal would be located remote from residential areas and services, and poorly served by public transport, and is therefore contrary to the key aims of NPPF which seeks to promote sustainable development and reduce growth in the length and number of motorised journeys. There is also an outstanding objection to the proposal in respect to the potential landscape impact of the development.

Based on that which is set out above, the proposal is not considered to be compliant with the Wiltshire Core Strategy and provisions in the NPPF.

# RECOMMENDATION

That planning permission be REFUSED for the erection for the following reasons:

- 1. The proposal is not within or adjacent to any settlement identified in the plan and is located in the open countryside, nor will it support sustainable farming and food production. It is therefore inconsistent with criteria i, ii, and iii of Core Policy 34 of the Wiltshire Core Strategy. In addition, it is not considered that the proposal would be of strategic importance to the Wiltshire economy, and therefore does not qualify as an exception to the general approach to employment land provision under criteria iv of Core Policy 34. The proposal does not meet provisions for additional employment land and is therefore contrary to Core Policy 34 of the Wiltshire Core Strategy.
- 2. The proposal does not fall into any of the circumstances set out in Core Policy 48 under which development in rural areas will be supported. The proposal is for new industrial units in the open countryside and therefore is contrary to Core Policy 48 of the Wiltshire Core Strategy.
- 3. The proposal, located remote from residential areas and services, and poorly served by public transport, is contrary to Core Policy 60 of the WCS as well as the key aims of NPPF which seek to promote sustainable development and reduce growth in the length and number of motorised journeys.
- 4. The character of existing local countryside in this area is permanently changing into a sprawling urban area, which pays little respect to appropriate local distinctiveness in terms of design or character. Further incremental and piecemeal industrial development at this site or at other local green field infill locations along the rural roads in this area will eventually lead to unacceptable cumulative change. Local receptors will experience to varying degrees, changes in views of additional industrial units, a new formal highway access and entrance splay with entrance signage, security fencing, outdoor storage of materials and parked vehicles, additional lighting, noise and moving traffic, which on balance is considered to generate unacceptable change and harm to the character of the countryside. Accordingly, the development

is considered to be in conflict with Core Policy 51 and 57 of the WCS as well as the key aims of NPPF which seek to deliver high quality design and enhance local landscape character and distinctiveness and also biodiversity wherever clear opportunities exist.

# Background Documents Used in the Preparation of this Report:

Application Submission and further revisions and additional information National Planning Policy Framework Planning Practice Guidance Wiltshire Core Strategy (Adopted January 2015) North Wiltshire Local Plan Chelworth C70 Culvert Technical Note

