

**WILTSHIRE COUNCIL  
STRATEGIC PLANNING COMMITTEE**

<b>Date of Meeting</b>	<b>13 March 2013</b>		
<b>Application Number</b>	<b>N.11.01531.FUL</b>		
<b>Site Address</b>	<b>Kemble Enterprise Park, Nr Kemble, Glos, GL7 6BQ</b>		
<b>Proposal</b>	<b>Hybrid Application (Full and Outline) For Employment Development Class B1 and B8 Uses.</b>		
<b>Applicant</b>	<b>Kemble Business Park Estates Ltd</b>		
<b>Town/Parish Council</b>	<b>Crudwell</b>		
<b>Electoral Division</b>		<b>Unitary Member</b>	<b>Councillor Soden</b>
<b>Grid Ref</b>	<b>395674 195945</b>		
<b>Type of application</b>	<b>Hybrid</b>		
<b>Case Officer</b>	<b>Charmian Burkey</b>	<b>01249 706 667</b>	<b>Charmian.burkey@wiltshire.gov.uk</b>

**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 9 letters of comment from local residents – 8 raising objections and 1 in support. Crudwell Parish Council raise no objections. Kemble Parish Council broadly support the application.

**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.

#### **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 for:

- 3 warehouse buildings with integrated office space , 1 in full and the other two in outline totalling (8460sqm B8 storage and 1, 395sqm B1 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 a high level of sustainable construction is proposed to minimise energy consumption. The applicant is investigating the provision of large scale renewable energy sources on site that will provide enough on site power for all the proposed buildings and will result in sufficient to export.

#### **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) .

Wiltshire and Swindon Structure Plan (saved Policies): DP1 and DP3 seek to deliver sustainable development within Wiltshire

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 2011 following significant pre-application discussions with officers. Throughout those discussions 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 was 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 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.

Despite a number of revisions and meetings, it is unfortunate that limited progress has been made.

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

- Plans elevations and artistic impressions.
- Design and Access statement.
- Statement of Conformity.
- Transport Assessment.
- Statement of Community Involvement.
- Ecology Assessment Plan.
- Ecological Survey Report.
- Employment Travel Plan.
- Phase 1 Habitat Survey.
- Listed Building Information.
- Planning Statement.
- Bat Survey.
- Botanical Survey.
- Tree Constraint Plan.

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

The agent has written a Statement of Conformity and this is summarised as:-

*The Statement of Conformity stresses that the development has been designed primarily to accommodate the growth requirements of existing local businesses and help them expand organically on site. This will help ensure that local jobs are protected and new ones created. The existing businesses draw most of the existing employees from the surrounding towns and villages.*

*The application provides highway benefits to the site, primarily from the introduction of a roundabout at the site entrance which will assist in reducing the speed of traffic along the A429.*

*They state that the proposal allows for the sensitive growth of an existing business location, using previously developed land and will deliver a scale of development which is in keeping with the existing site operations.*

*The document purports that the proposed development introduces new sustainable buildings that will be energy and heat efficient and that the proposal will introduce a new estate bus to link it to the towns and villages, there will be charging points for electric cars.*

*They consider that the proposal follows a likely pattern of growth should the airport have expanded naturally and that the larger buildings on site also have regard to the architecture of the existing hangars.*

## **8. Consultation**

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

It is considered that the proposal would be contrary to the extant and emerging development plan, as well as national planning policy in that it would lead to a significant expansion of employment floorspace in a countryside location that is remote from settlement and cannot be regarded as sustainable development. Although it is appreciated that the applicant has proposed steps to put in place and implement a Travel Plan, this will be at the goodwill of the companies and their employees and the reality could be very different. The high provision of new car parking proposed suggests that a comprehensive approach to demand management has not been taken.

Whilst undoubtedly the proposals would help secure new jobs in the local area, based on the existing pattern of employees working in 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 need to secure a sustainable pattern of growth and the harm to listed buildings

Highway Officer – 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.

Council Landscape Officer gives policy back ground 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 adverse comments

Council Ecologist – Ecological Surveys confirmed the presence of 11 small bat roosts of 3 species (common pipistrelle, brown long-eared and lesser horseshoe) with 6 species using it for commuting/foraging (common and soprano pipistrelle, brown long-eared and a myotis sp). Extensive areas of calcareous grassland are present across the site, although this occurs as a mosaic with neutral grassland in places. The site does not support reptiles or badger although it does support brown hare, hedgehog, starling, swallow, skylark and little owl.

The bat roosts would be destroyed for 3 species by the removal of buildings 9 & 20. An outline mitigation scheme has been submitted for the development and he is satisfied with this. A derogation licence would be obtained prior to the demolition of any roosts, so those parts of mitigation can be controlled by Natural England as the relevant licensing body.

The calcareous grassland habitats within the site qualify as the UK and Wiltshire (Biodiversity Action Plan) BAP habitat. Policy NE11 is applicable and seeks to improve such sites. The proposal will result in the loss of a substantial BAP habitat, particularly in the area around Buildings 2,3,4 & 5. The presence of calcareous grassland has not been recognised in the design rationale.

County Sustainable Growth Team – Wiltshire Core Strategy Policy 41 requires large scale developments to submit a sustainable energy strategy. The application was submitted before the Wiltshire Core Strategy was adopted and therefore should also be considered within the context of the adopted North Wiltshire Local Plan 2011 policy C1. The Design and Access (D&A) Statement submitted by Corstophine and Wright refers to high sustainability standards in Section 6.0. The statement refers to *targeting BREEAM Excellent and an A rated Energy Performance Certificate. Building 4 submitted for detailed approval, demonstrates several of the design opportunities that will assist in achieving the above noted targets. All other buildings proposed will be delivered in accordance with the same principles. The roof, walls and floor of the warehouse will be insulated to achieve U-values far lower than required.*

The scheme also advocates passive cooling, roof mounted solar pv panels and triple layer trombe wall heat storage, but this has not been quantified in energy or carbon reduction terms. The

architects have submitted a BREEAM pre-assessment in which they commit to 70.03%, just within the excellent threshold, which has a specific energy and carbon requirement. The use of a hybrid application should not distract planners from the requirement to make submitted developments sustainable. There is a clear requirement under Wiltshire Core Policy 41 for detailed energy strategy and a broader requirement under NWLP 2011 Core Policy C1. It should be possible to demonstrate exactly how building 4 will satisfy the BREEAM requirements. A renewable energy strategy for Building 4 must be submitted.

As an example it is noted that there is a substantial south facing roof but only 90 sqm of photovoltaic arrays are shown on the roof plan, while the access statement maintains there is a large array. 540sqm of pv panels would generate a yield of 61, 000kwh. Whilst this is a substantial output, it is trivial compared to the building's 10, 370sqm footprint and cannot be considered to be exemplar.

The D&A statement suggests that the warehouse will only require "trace heating" against frost, but this would be better quantified in kWh

In summary the application is supported as it demonstrates the energy requirements of low energy building by an experienced low carbon practice, but any permission should condition a full energy strategy to be submitted and approved.

Environment Agency does not object subject to conditions.

Cotswold District Council has no objections.

Gloucestershire County Council States that the Transport Assessment refers to some limited works to mitigate the impact of the development on the A433/A429 junction, but does not include details of these works. These have been requested and could be secured by way of planning condition. (ATL – this would need to be by way of a legal agreement).

Kemble Parish Council support the prospect of additional employment on a site in the locality. However, there are significant traffic and sustainability issues which need addressing: The travel plan is intolerably weak with no traffic impact assessment; The traffic roundabout appears to have been previously agreed, but creates an unnecessary impediment to traffic along the A429. A better location for a roundabout would be the A429/A433 junction.

Highways Agency do no object.

## **8. Publicity**

The application was advertised by site notice and neighbour consultation.

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

- Scale and form of buildings is inappropriate in open countryside.
- Serious visual detriment to open countryside.
- Contrary to Core policies C1, C3, NE4, NE15, NE18, NE20, HE4, T1, T2, T4, T6, BD1, And BD5 of NWLP 2011.
- Increase in traffic and heavy vehicles.
- 24 hour working causing disturbance.

Cotswold Airport comments as follows:

- 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*

It is important to note that the National Planning Policy Framework (NPPF) confirms that existing adopted planning documents are be able to be given full weight for 12 months after publication of the NPPF. The North Wiltshire Local Plan 2011 was adopted under the 2004 Act and for the 12 months following the NPPF's adoption due weight should be given to relevant policies in the existing plans according to their consistency with the framework.

The Wiltshire Core Strategy has now been submitted to the Secretary of State. 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 (ie partly full, partly in outline):

- 2 warehouse buildings with integral office space (8,640sqm B8 storage & 1, 395sqm of B1 use) one in detail and 2 in outline;
- A single B1 office building of 1, 395sqm in outline;
- A single B1 office of 2,790sqm in outline;
- A new gatehouse building of 1,600sqm in outline and a new vehicular access and roundabout.

The application is accompanied by a Planning Statement, which at para 6.39 states that a high standard of sustainable construction is proposed to reduce energy input. The applicant states that they are researching other renewable energy sources.

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. The proposed development will provide new premises to meet he 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.
- Policy DP1 of the Wiltshire Structure Plan 2011 deals with priorities for sustainable development with the priority being meeting local needs for jobs, services and affordable and special needs housing in all settlements. The Council has argued that the development does not meet local need for jobs as it is in such and unsustainable location.
- Policy DP3 of the Wiltshire Structure Plan 2011 refers to locational allocations of employment land of which this site is not one.



## 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 and although only in outline, the indicative drawings show that it will have a fully glazed frontage and be at least 2 storeys high with a curved roof. The building will be highly visible on the main road approach to the site and will cause a visual jar.

### 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 112m X 75.5m with a projection to the north measuring 100m x 10m. The building is 14.2m high along its entire length.

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 considerably less too as they have curved roofs.

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

The building shows a canopy to the southern elevation at a height of 14m and a depth of nearly 7m. This will be a significant structure of a highly visible nature.

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.

Buildings 5A and 5B have split the former building (which was shown as being the same as building 4) into 2. Whilst their form is therefore likely to be broken up they would still make a significant impact in that the built form in this very open area. 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 they will “clutter” the open setting of these hangars to the detriment of their setting.

Both buildings 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 14m and a length of 112m and depth of 75m, with a further projection on the northern side of 100mx10 and a projecting canopy on the south side of 7m at a height of 12m. The south elevation has a large glazed area, 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 not supplied any scale plans to demonstrate how these buildings will relate to each other. The artistic impressions are just that and cannot give comfort about the relationship of the buildings to each other.

### Other matters

The airport has 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 exemplar 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 (and the applicant has provided a letter expressing interest from an existing business on the estate), but this 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 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.

