

REPORT FOR THE STRATEGIC PLANNING COMMITTEE

Date of Meeting	22 April 2015
Application Number	14/08417/FUL
Site Address	Kemble Business Park Estates Crudwell Wiltshire GL7 6BQ
Proposal	A hybrid planning application for new B8 (storage and distribution) and B1 (office) space, including provision of a new vehicular access. Matters relating to the provision of new warehouse and ancillary office space (building 4) of 20210sqm and new vehicular access are in detail. Matters relating to the provision of a gatehouse building (B1) of 651sqm and 2 office buildings (B1) of up to 1355sqm (buildings 2 & 3) to be considered in outline with matters of appearance, scale and landscaping to be reserved for future consideration.
Applicant	Unknown
Town/Parish Council	CRUDWELL
Ward	MINETY
Grid Ref	0 0
Type of application	Full Planning
Case Officer	Charmian Burkey

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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.
- Changes from the previous application.
- 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 1 letter of comment from a local resident – raising objections. Crudwell Parish Council raise no objections. Kemble and Ewen Parish Council state that the proposal is good for employment on an existing site so they support it in principle. However, the road network is inadequate in the vicinity and is an accident blackspot. The increase in traffic movements at the A429/A433 junction will exacerbate the volume pressures and add to that accident blackspot. There needs to be significant junction improvements prior to the development.

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.

N/13/08417/FUL Refused for the same reasons as above

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. The building has subsequently been reduced in scale so that it does not project past the front of the elevations of the nearby houses to the south (in outline)
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 (in outline)
3. Building 3 has similarly been moved to relate better to the existing complex of buildings (in outline).
4. Building 4 is submitted in detail form. The design and location has been amended following comments by officers and Strategic Committee Members. The previous building 4 was sited towards the north of the site on the highest ground and closest to the airport's boundary. However, the building has been increased in size (to accommodate a specific end user....see later) and sited in the position previously occupied by building 5 towards the south of the site, but close to 2 listed hangars (Full application together with the access and roundabout).

The proposal is for:

- 1 new warehouse building with integrated office space measuring 20,120sqm of B8 storage and ancillary B1 office space (full application) .
- 2 office buildings (1,355sqm and 3786sqm of B1 use)(in outline).
- 1 gatehouse building (administrative space, security office and office use 651 sqm) (in outline).
- A total of 22,216 sqm (The previous application with 2 less buildings was for a total of 25, 855 sqm)

The agent has supplied information regarding the floor space of buildings to be demolished which amounts to 1650 sqm. Buildings 1, 2 & 3 amounts to 3, 361sqm of new floor space ie an increase of 1711sqm.

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 59 car parking spaces in association with building 4 (4 will be disabled bays) with buildings 1, 2 and 3 having maximum parking when details are submitted. It is anticipated that approx 120 new jobs in building 4 and approx 200 jobs in the other units when they are 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

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 57 (Ensuring High Quality Design and Place Shaping), 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 26th September 2014 following the Committee's decision to refuse application N/13/01593/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 and indeed the 2013 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.

Unlike in the other cases, Pre-application advice has been 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.
- Desk based Archaeological Assessment.
- Ecological assessment
- Heritage Statement and Impact Assessment..
- Employment Travel Plan.
- Ecological Assessment
- Planning Statement.
- Bat mitigation strategy.
- Tree Schedule.
- 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 and are in addition to those given for N/13/01593/FUL, which were summarised as follows:

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 that were made for N/13/01593/FUL, 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.

On the current application the Spatial Planning Team state that in conjunction with the above comments the following comments are applicable. The principles around Core Policies 1, 2 and 37 are well set out previously. This response focuses in particular on whether the proposals satisfy the requirements of Core Policy 34 “Additional Employment Land”.

The main changes since the previous proposal is the substantial increase in proposed warehouse floor space (over 30%) and a modest decrease in overall office space. The supporting information indicates that the warehousing is intended for the expansion of an existing business on site. The rationale for provision of additional office floor space, involving a further 3 buildings, is less certain and appears a speculative proposal that would expand the size of the business park. The balance and mix of the proposals has been amended but not in a way to fundamentally change the nature of the development. The main considerations remain the same and that the proposals are in conflict with the development plan policies.

The Core Strategy is an employment led strategy, including the objective of retaining and supporting the growth of indigenous business. Subject to proposals not having an unacceptable impact, planning policies would normally look to support the construction of new premises that allows an existing business to expand, but this site’s relative isolation remote from settlements means that this proposal cannot be seen as sustainable development.

On the last revisions the Spatial Plans Team comments that they focus in particular on whether the revisions to the proposals satisfy the requirements of Core Policy 34. The comments supplement those previously given. The applicants propose a decrease in B1 space but it is still on a purely speculative basis. These are uses that should look to locate in the town centre and only as a last resort in a location divorced from any settlement. Just because the increase in floor area is less than the threshold of 2500sqm for an impact assessment to be required and to fulfil a sequential test, this does not mean that the

proposals have no impact or represent sustainable development. A further reduction in office space does not fundamentally change the form of the development. The previous conclusions remain the same; the thrust of which is that the proposals are in conflict with development plan policies, all though the degree of conflict is less profound.

The major amount of floorspace subject to these proposals is for warehousing and to provide for the needs of an existing employer. This element of the proposals suggests the retention of 75 jobs. The retention and prospective jobs is a material consideration in the balance of arguments. But beyond this there is little evidence of the part played by the company in the local economy. A lack of objection does not in itself substantiate a strategic significance to the proposals.

Crucially there is no justification for what seems an entirely speculative element of 3 separate office buildings. There is no explanation as to what role, if any, they may play in the wider strategic economic interests of the County as a whole, or any other gain, when policy points so clearly to greater benefits from such investment in better and more accessible locations elsewhere.

Overall the balance of planning considerations compared to the previous application has altered once more but again it has not fundamentally changed. The proposals still accentuate a pattern of land use that cannot be considered sustainable development. The proposals do not conform to WCS policy CP34.

(The remainder of the comments from the Spatial Plans Team make up the Planning Considerations to avoid repetition in a long report)

In response to these latest comments (other commentary on the application from the agents is available on the planning file) the agents comment that they are concerned that in considering the economic planning policy matters a proportionate approach has not been applied. It is apparent from the policy comments that the principal issue which raises a policy objection is the presence of the 3 office buildings.

The guardhouse is not a speculative element, being reasonably required for administration and security of the wider site. The existing site is an established employment destination with a range of tenants as set out on a number of occasions as part of the planning application. Along with the employment site to the north at Cotswold Airport, Kemble is a strategic employment location and should be considered accordingly.

With regard to the two further office buildings, the cumulative scale of these has been reduced. They now propose a combined floor area of 2710sqm which should be considered against the demolition of useable floor space measuring 1650sqm. This net increase is not considered to be significant. It falls well below the threshold for an Impact Assessment or Sequential Test. It is suggested that by not undertaking an Impact Assessment negative weight can be attributed to the impact of proposed office buildings on town centres within the locality. Paragraph 015 of the Planning practice Guidance makes it clear that Impact Assessments should be proportionate. The NPPF recognises offices as Town Centre uses, it does not encompass all office development. The additional accommodation is for those businesses seeking expansion on the site. There is currently no available office space on the site, which is a major constraint to the vitality of Kemble as a business location. Not providing the expansion space will lead to loss of businesses from the site. The offices are for the medium to longer term.

For clarity the level of employment is conformed at:

- *Existing Rapid Racking = 70 employees*
- *Proposed expansion 50 employees*
- *Jobs to be created following re-use of buildings vacated by Rapid Racking = 70 employees*
- *New office buildings = 50-70 employees (per building)*
- *New Gatehouse = 20-30 employees*

In light of this, the proposed new Rapid Racking building will generate a net increase of 120 new employees at Kemble, including the re-use of the building vacated by the company. In addition, it is anticipated that the new office building will generate between 100-150 new job opportunities and 20-30 new jobs in the gatehouse.

Cumulatively the proposal will generate in the region of 250 employment opportunities at Kemble. This should be seen in light of a net reduction of employment should Rapid Racking re-locate out of the area. In the light of this, the wider benefits to the local economy have been considered as part of the accompanying planning application, including additional local revenue generated locally through the use of local services. It is therefore, that Kemble Airfield Enterprise Park is of strategic importance to the local economy and its long term vitality and viability is a material consideration of significant weight.

It is considered that insufficient weight has been apportioned to the significant benefits that the proposal will have on the local economy, job creation on an established employment site, utilizing previously developed land and the retention of a multi-national company within the County. Taken as a whole, the proposal will have significant benefits for the strategic economic interests of Wiltshire, consistent with Policy 34 of the Wiltshire Core Strategy.

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 now guaranteed for 5 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 – Is disappointed to see that despite the encouraging discussions at our meeting with the agents, very little has taken on board. The proposed new building is extremely large and, together with the bunding, will be very obvious and will harm the setting of the listed hangars. The outline office buildings appear to be the same size as shown on the last application and no account has been taken of comments to amend the scale. There seems to have been a slight tweak to the new entrance road alignment, but it is still curvy and the views straight to the listed water tower when entering the site are not retained. The scale, design and layout do not reflect that of the existing heritage assets (both designated and undesignated), with the result that these new buildings would dominate the site and harm the setting of the heritage assets.

Although it is felt that construction of any new building in the vicinity of the listed hangars would harm the setting of the heritage assets, it is acknowledged that the discussions led to a reluctant agreement that one building may be acceptable, subject to scale and details. However, the outline proposals for new buildings, as well as the road re-alignment remain as harmful as before and the scheme is not supported.

Additionally there is no management plan that will ensure the long term maintenance and future of the designated heritage assets. Without such a document there is no justification for the new development on this site.

The proposals are contrary to the NPPF (2012) paragraphs 17, 131, 132, 134, 135 and 137.

Council Landscape Officer, unlike previously, considers that the latest planning application is unlikely to generate any significantly harmful effects to the wider landscape character or visual amenity interest in relation to the requirements of saved Policy NE15 of the North Wiltshire Local Plan 2011 and Core Policy 51 in the Core Strategy. He also considers that the Council's duty under section 85/1, CRoW Act 2000, to have been appropriately considered (as Cotswolds AONB and its setting is unlikely to be harmed). He considers that the applicant has addressed the unnecessary loss of trees by the amendments made to the re-alignment of the entrance road and adjacent footpath.

Should the application proceed to approval there are a number of landscape and landscape related planning conditions that will be required to address:

- Tree protection and implementation.
- Detailed design and implementation of hard and soft landscaping schemes.
- Detailed design for sensitive low impact external lighting and signage schemes.
- Details of all boundary treatments.
- Landscape/Green Infrastructure/Ecology Management Plan.
- Implementation/Establishment/Maintenance/Management phases.
- Approval of external sample materials/colours to buildings.

Council's Environmental Health Officer states that it is necessary to ensure that **noise** from fixed plant and machinery associated with the proposed buildings does not affect amenity. There is also concern over deliveries to and from units and waste collections may adversely affect amenity. There should be a noise survey.

A scheme of acoustic insulation and noise control will need to be submitted and controlled by way of planning condition.

The site borders the Cotswold AONB and it is necessary to protect the environment from **light** pollution. Conditions are suggested.

Council Ecologist –states that the proposals will result in the destruction of a building which supports active bat roosts resulting in a breach of the Habitats regulations. A Mitigation Strategy has been submitted and he is satisfied that the proposals could be licensed by Natural England and as such he has no objections, subject to securing the mitigation measures through a suitably worded condition.

County Sustainable Growth Team – point out the section in the D&A statement about Sustainability and requests that in order to demonstrate the commitment to achieving BREEAM Excellent and an A rated Energy Performance Certificate, evidence needs to be supplied at the planning stage. A BREEAM pre-assessment from a certified assessor would go some way towards this.

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's comments are awaited.

Gloucestershire County Council has not responded but stated last time that 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).

Crudwell Parish Council has no objections.

Kemble and Oaksey Parish Council state: The proposal is good for employment and on an existing business Park so support in principle. However support should be qualified as follows. The local road network is not adequate to accommodate additional traffic and the A429 passing the airport is an accident blackspot. In addition, the increased traffic volumes at the junction of A429 and A433 will exacerbate the volume pressures and accident risk at another local accident blackspot. Attention to significantly improve both of these blackspots should be a pre-requirement of any planning consent with road works to be completed before any development work commences. .

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

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8. Publicity

The application was advertised by site notice, press advert and neighbour consultation.

1 letter of objection has been received. Summary of key relevant points raised:

- The NPPF supports sustainability and nothing has been amended to remove the previous reasons for refusal.
- The most relevant paragraphs of the NPPF have been noted.
- There are vacant warehouses which could be brought back into use.
- There is no justification for the new buildings.
- It is not clear why the proposed tenant could not occupy one of the existing units.
- The wildlife will be disturbed by the additional lighting.
- The proposal leads to removal of wall and shrubs not in the control of the applicant.
- The Transport Assessment lacks “meat on the bones” and is 8 years out of date.
- There is no suitable public transport to the site and the shuttle bus is only proposed for 3 year.
- The new roundabout would impede traffic flow.
- The A429/A433 junction is already at capacity and there are no proposals shown for improvements

Cotswold Airport notes that building 4 is now to be used by Rapid Racking, but it is not suggested that the permission is personal and significant weight cannot be attached to the presence of a stated end user. The overall scale of the building seems excessive for one specified relocation.

The agent states that there will be strong demand to re-let Rapid Racking's existing warehouse, but this is not substantiated and the planning agents presented a contrary position on the basis of a limited demand for such premises in order to justify a quasi residential redevelopment (see in particular Colerne airfield)

The land is remote from additional employment land and is not identified as a principal employment area. The overall scale of the development cannot be seen to support the retention of existing businesses on site.

The boundary shown between the airport and the site is incorrect.

There is concern about external lighting affecting night time operations at the airport and any lighting should be conditioned. The roof glass and other areas allowing light spillage are a concern.

The landscape strategy will involve the planting of new trees and it is important that these do not increase bird numbers near the airport.

There is concern over the use of cranes and a construction method statement will be required.

9. Planning Considerations

Principle of development & policy setting

Policy weighting

The National Planning policy Framework and the Wiltshire Core Strategy (which has now been adopted) form the policy framework for the determination of this appeal.

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):

- 1 new warehouse building with integrated office space measuring 20,120sqm of B8 storage and ancillary B1 office space.
- 2 office buildings (1,355sqm of B1 use).
- 1 gatehouse building (administrative space, security office and office use 651 sqm).
- A total of 22, 216 sqm (The previous application with 2 less buildings was for 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 retain 75 jobs alone in realistic terms in building 4 with a potential further 50 (although there is theoretical potential for up to approx 170 across the site). 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:

- 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 that he is now satisfied with the impact of the new building on the landscape.
- Wiltshire Core Strategy Policy 57 concerns itself with ensuring a high quality standard in design, creating a sense of place and drawing on the local context whilst being complimentary to the locality. Development must, amongst other things, respond positively to the natural and historic environment and be sympathetic to any historic buildings and maximising opportunities for sustainable construction.
- 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. The applicants have been advised to try and address this prior to the application coming before the planning committee and their comments are awaited.

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 now set in line with the existing building line and although only in outline, the indicative drawings show an improved design, which better reflects the military setting.

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. Building 3's position is now more in line with the outer buildings of this main part of the enterprise park.

Both buildings are in outline with only the layout for approval. Building 3 has been reduced in scale to better reflect other buildings on the site. 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 (as the application is in outline) 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 area.

Building 4

Building 4 has been increased in size and re-located towards the south of the site, just to the north of a pair of listed hangars. The new building has a floor area of 20,120 sqm and measures approx 151m x 125m and a height of 16m. The roof is a double parabolic shape. In addition to the main building there is an office extension on the north east side measuring 68m x 6m and 12.5m in height. The applicant has supplied drawings to show it in the context of listed hangars nearby. The proposed building will be approximately 4m higher than the hangars nearby. The building will need to be dug into the ground somewhat as the land is sloping upwards to the north by approx 1.5m across the depth of the building. The listed hangars are set approximately 1m lower also.

The proposal includes some bunding on the south eastern side which will partially reduce the impact of the building when viewed from the A429, but the scale of the building means that it will be seen as a significant backdrop to the listed hangars particularly when viewed from the lane to the south.

The NPPF gives the conservation of Heritage Assets greater weight and means that the Local Planning Authority must identify the harm to the Heritage Asset and consider whether it is serious harm or not. Against this must be weighed the social and economic benefits.

One of the Core Principles of 'the Framework' is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. In determining planning applications, paragraph 131 of 'the Framework' includes a requirement for local planning authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets. Furthermore, paragraph 132 of 'the Framework' states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. There is also a duty to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.

There is a statutory requirement to pay "special regard" to the desirability of preserving the setting of a listed building. That desire should be given "considerable importance and weight" in carrying out a planning balancing exercise, this principle is set out in the Barnwell Manor Case (Barnwell Manor Wind Energy Ltd v E. Northants DC, English Heritage, National Trust & SSCLG).

Section 12 of the NPPF relates to conserving and enhancing the historic environment. Para 128 requires an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

The conservation officer and planning officer have concluded that the proposed development would have less than significant harm on the heritage asset. Under Paragraph 134 of the NPPF this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Whilst the public benefit may be considered to be the jobs created, the advice is about public benefit to the heritage asset. It is not of benefit to listed buildings themselves.

The package of benefits which can be given weight in the overall planning balance do not overcome the harm identified.

In negotiations on the previous schemes, the height of the building was reduced (albeit in a different location) to approx 12.6m and the length was only 113m. The current building is thus a considerable increase in size from that previously considered and is still very close to the pairing of the listed hangars. It would dwarf and dominate them in what is an open landscape would inevitably cause harm to their setting. This then must be balanced against the benefits that such employment will bring..

The benefits are the employment opportunities afforded by encouraging an existing employer on the site to remain and expand. Although a first occupation condition has been suggested by officers, this is yet to be clarified. So, although there is some comfort that the end user has been identified, there is no actual commitment to occupation of the unit. The Core Strategy is employment led, but the NPPF focuses on Sustainability. The location is clearly unsustainable with the majority of the workers arriving by car and although a variety of measures (such as a shuttle bus and travel co-ordinator to encourage car share) are proposed, they will only be maintained for 5 years and cannot force the workforce to travel by such means. The existing premises of the employer employs 70 people and these will be retained, with the building being able to be re-used for a similar level of employment.

The conservation officer maintains that significant harm will be caused to the setting of the listed hangars and this is not outweighed by the creation of jobs in this unsustainable location.

Only Building 4 is in full, the other applications are purely speculative although there are a number of businesses on the site which need to expand.

The conservation officer also makes comment on the re-alignment of the access road and the impact that this has on the views of the water tower. Whilst it would be preferable to maintain the existing arrangement, the introduction of a roundabout would negate this as a possibility, but the re-alignment has meant that more of a straight view is preserved and in fact the view from the A429 is across a car park first and therefore maintained to an extent that is considered to be acceptable.

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 have previously expressed that they are happy with the proposal subject to some improvements to the A429/A433 junction. (S106). Their comments are awaited on this application.

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 south of the site. The section on the impact on the heritage asset above demonstrates that it is considered that there would be harm to the setting of the listed buildings but that has to be weighed against the potential to keep an employer on site and to allow it expand. It should be noted that the landscape officer no longer objects to the proposal and considers that, subject to conditions, that the building can be assimilated into the landscape.

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. Building 4 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) will have an impact in the open countryside, but one deemed by the landscape officer to be acceptable.

Other matters

The airport has previously objected to this building (and potentially the others) because of its size and form. Safeguarding is not a planning reason for refusal. Concerns about lighting can be controlled by way of planning condition and should be, but the site currently has no control over the lighting of the buildings and it is considered that this would be an unreasonable reason for refusal. The planting of trees falls outside the scope of planning control and that planting proposed is not considered to be so substantial as to warrant re consideration.

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 (now adopted) 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 (The proposal amounts to 22, 216 Sqm increase across the whole site). Furthermore, a robust and long standing 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. The submitted Heritage Asset Statement goes some way to address this, but gives no real comfort to the Planning Authority that real money will be invested into buildings which are perhaps more costly to maintain and not always easy to re-use. 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 yet the case with this application. The proposal does have positive and enhanced sustainability credentials, but these have not been demonstrated to be of a magnitude to outweigh other concerns. The prospect of securing approx 70 and a potential further 50 jobs is to be welcomed, although no end users for buildings 1, 2 & 3 have been identified. Notwithstanding this, the prospect of such jobs cannot be considered to outweigh the issues set out above.

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; do not meet the sustainable development objectives of the Core Strategy, are not consistent with the scale of their location, adversely affecting nearby buildings and are considered to be remote, involving development of an open area. The proposals are thus considered to conflict with Wiltshire Core Strategy Policies 34 & 37.
- 2) The proposals lack sufficient detail to ensure that they preserve or enhance the setting of the heritage assets on site and are thus contrary to 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. There is considered to be less than significant harm to the Heritage Assets, but this harm is not outweighed by the public benefits as set out in paragraph 134 of the NPPF.
- 3) 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 Wiltshire Core Strategy Policies 60 and 61 and advice within the National Planning Policy Framework 2012 about delivering sustainable development.

