

Wanborough Parish Council

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23rd January 2019

Swindon Borough Council
FAO Ed Snook
Planning Department

Dear Mr Snook

Re: Planning Application: S/OUT/18/1943 - Inlands Farm The Marsh - A Hybrid Planning Application for a Science Park and associated works to include full details of 33,507 sqm (GIA) of Use Class B1c (light industrial), with associated access, parking, landscaping and drainage and an outline proposal for up to 32,281 sqm (GIA) of Use Class B1b (research and development) and up to 16,400 sqm (GIA) B1c (light industrial), with associated access, parking, landscaping and drainage (all matter reserved).

I confirm that Parish Council have considered the above application at their meeting on 21st January and strongly object for the following reasons:-

1. Swindon Borough Council's (SBC) Local Plan 2026 & Local Plan review
 - a. The site is allocated within SBC's area of "Non Coalescence", Policy NC3, which states "The character and identity of Wanborough will be protected" and only a "small scale development within this area will be permitted where it retains or enhances the existing character of the countryside". This proposed development is not small scale will not enhance the existing character of Wanborough and therefore is **contrary to planning policy NC3**.
 - b. SBC have allocated an additional 77.5 hectares of employment land to meet "Swindon's development needs whilst protecting the Borough's most important assets", Policy SD2. 40 hectares of land has been allocated within the New Eastern Villages, located not far from this site, in fact Savills are currently advertising a site at Symmetry Park which has outline permission stating that it can be "built to suit". In addition the "employment site" at Badbury Park, again within close proximity of M4 Jnt 15 and not very far from this site was advertised for many years, due to no demand this site was granted permission by SBC for housing instead. Clearly SBC have allocated sufficient employment land within their Local Plan 2026, there is no evidence to support allocating further sites. This proposed development is **contrary to planning policy SD2**.
 - c. SBC are currently carrying out a Local Plan Review to ensure sufficient deliverable housing and employment sites are available in the plan period. As part of this review SBC have carried out a SHELAA (Strategic Housing, Economic, Land Availability Assessment) consultation. As part of this

assessment Inlands Farm was put forward for a possible employment site (s0034). SBC have “Rejected” this site for a number of reasons . This confirms there is no evidence to support an employment site at this location.

2. Area of Outstanding Natural Beauty (AONB)

The southern boundary of the proposed site follows and abuts The North Wessex Downs AONB. National Planning Policy Framework (NPPF) paragraph 172 states that “Great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection”. SBC Local Plan Policy EN5c also states that “Proposals outside the AONB should not adversely affect its setting”.

A large warehouse, 14.5m in height covering an area of 30,000 sqm right next to The North Wessex Downs AONB will have a severe detrimental impact on the landscape and setting of the AONB.

The mitigation proposals put forward by the developer include:-

- A narrow “planted buffer” along the boundary of the AONB, and
- Ivy planted along sections (not all) of the wall facing the AONB, and initially only 1/5th (3m) of the height of the building (as per Landscape Strategy document).

After planting, trees will take a significant amount of time (15 years as stated in Chapter 9) to grow to a height that will mitigate a building of this size and magnitude; again the ivy will take several years to establish and reach the full height of the building and it is not proposed to cover the full area of the building, therefore the mitigation proposals are not sufficient.

Due to the topography of the area, the view from Liddington Castle (Historic site within the AONB) will look directly down onto this proposed site. As the developer has not proposed putting any mitigation in place for the view looking down on the warehouse from a higher elevation, the proposed warehouse will clearly be visible from a wide-reaching area of the AONB.

The impact on the AONB’s landscape and setting will be extremely “High” and contrary to both National Planning Policy (NPPF paragraph 170 & 172) and SBC’s Local Planning Policy EN5.

3. Footpaths

There are a number of rural footpaths running through this site: including footpath 6 from Pack Hill to the Woodland Trust Land at Warneage Wood, footpath 8 from The Marsh to the Woodland Trust Land at Warneage Wood and footpath 21 from The Marsh across the site towards the Woodland Trust Land. All three are walked regularly and enjoyed primarily for the reason that they are within the open countryside.

The developer states within the application that they will retain the footpaths, however footpath 8 & 21 will have to be diverted significantly in order to fit in the proposed development. It is clear that the character of the footpaths will change completely and will no longer provide the health benefits (physical and mental) of walking in the open countryside.

In addition to these footpaths, there are also footpaths from Liddington and the North Wessex Downs AONB which lead to the site, (footpath 5). The proposed development will have a detrimental impact on the view and setting of these rural footpaths. NPPF paragraph 172c states that consideration and assessment should be carried out on “detrimental effect on the environment, the landscape and recreational opportunities”. Further, Section 85 of the Countryside and Rights of Way Act 2000 (CRoW) places a statutory duty of regard on all relevant authorities for potential development proposals outside of the boundaries of AONB’s that may have an impact within the designated area to conserve and enhance the natural beauty.

4. Local Heritage - Wanborough Conservation Areas and Listed Buildings

NPPF paragraph 170 states “Planning policies and decisions should contribute to and enhance the natural and local environment protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside”.

SBC’s Local Plan 2026 Policy EN10 states that “Conservation Areas are places designated as having special architectural or historic interest whose character and appearance should be preserved”, including the “setting”.

NPPF paragraph 127 states that development should be “sympathetic to local character and history, including the surrounding built environment and landscape setting”.

Upper Wanborough Conservation Area is at a higher elevation (c.150m) and looks down and over the proposed site (c.100m) from the east. To mitigate the impact of the proposed development the developer is proposing to plant a small woodland area to the eastern side of the site, however a small woodland area will not mitigate the view from a higher elevation and the proposed site will have a detrimental impact on the Upper Wanborough landscape setting.

St Andrew’s Church, a Grade 1 listed building, and the public open space known locally as “Church Meadow” are located in a prominent position within Upper Wanborough Conservation Area. The proposed development will have a detrimental impact on the view from St Andrew’s Church tower and Church Meadow.

There are a number of Grade 2 listed buildings along Church Road from where it meets Pack Hill. A number of these have rear gardens which over-look the proposed site. The proposed development will have a detrimental impact on the landscape setting of these listed buildings within Upper Wanborough Conservation Area.

There are a number of Grade 2 listed buildings and buildings of historic importance along The Marsh. This application will have a huge impact on the historic environment along The Marsh, completely changing the character of the area. There is nothing included within the application as to how the proposed industrial site will mitigate the impact on Great Moorleaze Farm and the other small group of houses at the corner of The Marsh junction with Pack Hill. Currently situated next to a quiet rural road, this proposal will change it to a road that is the main access point to an industrial park with a number of large lorries passing within a few metres of these houses.

There are no plans shown within the application which show a “to scale” artist’s drawing of the proposed warehouse (phase 1) within the surrounding countryside. This information is needed to understand the true scale and impact that this development will have on the surrounding area.

The proposed development is contrary to NPPF paragraph 170 & 127 and SBC Local Plan Policy EN10.

5. Flooding

The proposed site suffers from a considerable amount of surface water flooding due to the low-lying, level nature of the site, at the foot of fields sloping up to Wanborough, from where surface water flows down onto the site. During periods of heavy rain, the lack of gullies along Pack Hill allows the road to be used as a conduit and as a result water flows down Pack Hill at a rapid rate. Parish Council have witnessed large areas of the proposed site covered in surface water as a result.

The first half of the groundwater monitoring survey for the Flood Assessment Report, included as part of this application, was carried out during one of the hottest summers ever recorded. In order

to gain a better indication of the problems with surface water flooding within this site the second half of the groundwater survey needs to be carried out during the winter months. It will not be possible to confirm if the onsite flood mitigation proposals are sufficient until the remaining groundwater monitoring survey has been carried out.

From the groundwater monitoring survey carried out by WSP the report indicates that the “groundwater” level results are near to the existing surface level and this is without the results from the winter months. Parish Council is therefore concerned that taking away large areas of land that act as “water meadows” for this proposed industrial building will result in an increase in flooding for neighbouring properties, land and the road network. Parish Council therefore question whether the proposed flood mitigation proposals will be effective.

The access road from Pack Hill is within Flood Zone 2/3 and regularly floods both from the Lyden Brook and from surface water flows from Upper Wanborough.



The photo above to the left is an example of when the road from Commonhead roundabout (prior to the junction with The Marsh) completely flooded. The map to the right is from the Environment Agency website, showing the area of road within flood zone 2/3. This is an issue that SBC will have to solve for the Southern Connector Road (SCR), however as Phase 1 of this application is prior to the implementation of the SCR this application needs to take into consideration the impact of flooding on this section of the road, being the main access road to the site.

6. Transport and Access to proposed Site

a. Public Transport

The Transport Assessment states (para 3.4.2 & 3.4.3) that there are two bus stops within walking distance of the proposed site, at The Calley Arms and The Marsh. The distances quoted in the Transport Assessment are inaccurate, the actual distances from the industrial site’s pedestrian entrance are as follows:

The Calley Arms	1.2km (20mins to walk), not 450m (6mins to walk)
The Marsh	1.1km (15mins to walk), not 500m (7mins to walk)

Both routes have no pavement so any pedestrians would have to walk along the edge of a narrow rural road that is completely unlit. In addition, the route up Pack Hill is extremely steep, making both bus stops inaccessible for the employees of Wasdell Packaging.

In addition the Transport Assessment includes the following inaccuracies:-

- There are not three buses from The Marsh bus stop (para 3.4.2 & 3.7); bus 157 is the Ridgeway School late bus and it’s only for students leaving Ridgeway School at 16.45 on Tuesday, Wednesdays and Thursdays. There are only two buses that serve the village, which are 46a and 48a.

- Bus service 47 (now bus 90) from The Calley Arms is funded by West Berkshire Council and Wanborough residents cannot rely on this service; it is only a mini bus and if there isn't space Wanborough residents are refused.
- Paragraph 3.4.5 (table 3) indicates that there is public transport available from Wanborough every 15 to 25mins; this is clearly not the case. Bus services 46a and 48a serve Wanborough during week days. There are only 5 buses leaving the village for the bus station from 8.09am, with the last at 1.39pm. Again there are only 5 buses returning from the bus station to the village, with the first at 11.35am and the last at 5.55pm. There are currently no morning buses from Swindon to Wanborough for the employees of Wasdell to use and again there are no buses leaving Wanborough for Swindon at the end of the working day.

The applicant is proposing (para 5.2) to provide a private shuttle bus from Swindon bus and train stations at peak times. However there is no indication as to the size of the bus proposed, i.e. is it a mini bus? In addition the shuttle bus would need to meet the needs of all employees, the Transport Assessment Part 1 from Appendix 14.1 confirms that the existing shift systems (various) will be in operation for both Phase 1 (1200 employees) and Phase 2 (an additional 700 employees). The main Production shift pattern is 06:00 - 14:00 hrs, 14:00hrs - 22:00 hrs, and 22:00hrs - 06:00 hrs. Monday to Friday, with a different shift pattern over the weekend. It would be extremely difficult to run a private shuttle bus to cover all these peak times and meet the needs of all employees and therefore unlikely to be sustainable. There is also no indication as to how long Wasdell Packaging will agree to fund this for.

The proposed public transport scheme is not acceptable and will force more employees to travel by car to work.

b. Proposed Access

The proposed access for Phase 1 is directly from Pack Hill, with only minor widening of the road around the entrance. Pack Hill is a narrow country road which cannot cope with the large lorry traffic that this proposal will bring. The proposed widening of Pack Hill around the entrance will not be sufficient to cope with large HGV Lorries or construction traffic that will need to use this entrance for this proposed development. The proposed access is near a bend in the road which makes it difficult to see around when driving down from the village. Adding an entrance to an industrial site at this point will make the corner even more hazardous.

Pack Hill road forms the boundary of the AONB and allowing a major access into an industrial park will change the character and setting of this rural road. In order to make an access point directly onto Pack Hill a large section of the hedgerow along the road will have to be removed, destroying the natural, rural environment of Pack Hill.

c. Commonhead Roadabout

There is no proposal to widen the access road from Commonhead roundabout onto Pack Hill as part of the scheme. Entering Pack Hill from Commonhead roundabout, there is a sharp bend to the left and the tightness of the road on this bend will be extremely hazardous for lorries (and vehicles driving in the opposite direction at the same time) to use.

In addition, Phase 1 is prior to the signalisation of the roundabout, which is only due to be upgraded when the Southern Connector Road is installed. At busy peak times, it is extremely difficult to exit onto the Commonhead roundabout from Pack Hill. The additional traffic that this proposed development will bring will result in very large queues building up at this junction; traffic will not want to sit in a lengthy queue and will therefore find alternative routes including "rat running" through The Marsh, Upper Wanborough and Liddington.

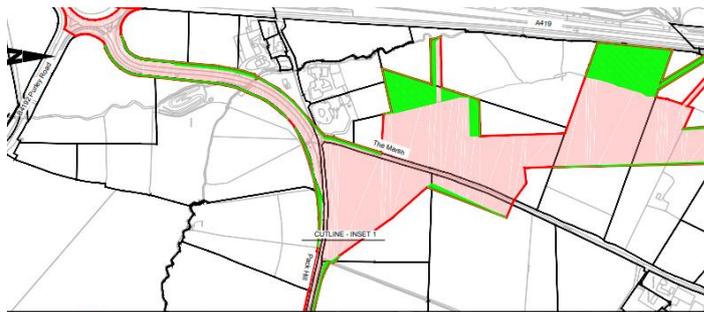
The Transport Assessment has assumed that all traffic to the site will come via Commonhead Roundabout and not through Wanborough village. Traffic on the A419, Marlborough Road, and Commonhead Roadabout suffer regularly with queueing traffic, especially when there is an

accident on the M4 or A419. Traffic will find alternative routes to avoid this problem and as a result will travel via Covingham, Wanborough Road and through the village to gain access to the site. The Transport Assessment needs to take into consideration “rat running” through Wanborough village and what mitigation proposals will they put in place to prevent this. This is a serious flaw in the Transport Assessment which needs to be addressed.

d. Southern Connector Road (SCR)

The Southern Connector Road is included within SBC’s Local Plan policy NC3 as one of the key pieces of infrastructure for the delivery of the New Eastern Villages (NEV). At no point has an industrial park been included in the planning and delivery of the SCR. If this industrial park is given permission it will have a prejudicial effect on the delivery of the SCR and NEV.

In addition SBC agreed a “compulsory order” of land along The Marsh for delivery of the SCR at their cabinet meeting on 17th October (minute no 42).



The map above shows the areas coloured in pink as the areas that will be compulsory purchased for the SCR. There is clearly a conflict with the land SBC require for the SCR and the proposed site area within this application with some of the proposed site crossing over into the areas that SBC need for the delivery of the SCR. This will have a detrimental impact on SBC’s strategic development plan and is **contrary to planning policy NC3**

This proposed application heavily relies on the Southern Connector Road (SCR), with a proposed temporary access onto Pack Hill for Phase 1 and then the main access from the roundabout to the SCR for Phase 2. The SCR has not been designed for this industrial park and the proposed development doesn’t provide any improvements to the scheme to allow provision for this additional traffic, In addition SBC have not given any exact date as to when the construction of the SCR will commence and have confirmed that there isn’t sufficient funding, this will therefore result in the proposed “temporary” access onto Pack Hill becoming a longer more permanent proposal which will have a detrimental impact on Wanborough Village.

e. Parking allocation on site

Phase 1 of the application has allocated 141 car parking bays for workers. The total number of parking bays has been calculated on the basis of doubling the current allocation at Wasdell’s packing site at Blagrove. The basis used in the application is that the current allocation at Blagrove provides sufficient parking, they plan to double the number of staff at the proposed site to 1200 and therefore doubling the parking capacity should be sufficient. However the public transport links at Blagrove are far better than those in Wanborough; employees that have been relocated from Blagrove will have further to travel to Wanborough and are therefore more likely to drive. Clearly there is insufficient allocation of parking for Phase 1 on site and this will result in workers having to find other places to park which will result in cars parking along the edge of The Marsh making access to the village extremely hazardous.

f. Lorry trip information

It is not clear from the Transport Assessment (November 2018) how many Lorries are expected to travel to and from the industrial site. The Transport Scoping Report (October 2017) indicate that

there will be in the region of 47 Lorries a day, but this is based on current Lorry trip information from Blagrove, it doesn't seem to take into consideration their other sites.

The phase 1 industrial unit has two ingoing loading bays and four outgoing loading bays. In addition there are areas allocated for lorry parking and a separate external building to provide rest facilities for lorry drivers. Clearly this gives an indication that there will be several lorry trips to and from the site daily. The expected number of Lorries should clearly be specified as part of the application and included with the Transport Assessment (November 2018). Pack Hill is a rural country road and cannot cope with large HGV Lorries that this application will bring.

g. Other road users

There are a considerable number of equestrian businesses in and around Wanborough who regularly use the roads including The Marsh and Pack Hill. There is no consideration within the application for equestrian movements within the Transport Assessment. This is clearly an omission and should be included, the impact of this proposal will impact the safety of equestrian users on the roads and will impact on their businesses.

The application proposes to install a new shared pedestrian and cycleway from the entrance to the site on Pack Hill upto Commonhead Road, however it is not clear how the road will be separated off from this new proposed pedestrian and cycleway, with large HGV lorries using the road, which is far too narrow for them and could result in them spilling over onto the pedestrian and cycleway making is extremely hazardous.

The transport scheme for proposed phase 1 of the development will have a detrimental impact on the surrounding area and is contrary to NPPF paragraphs 109 & 111 and SBC's Local Plan 2026 policies TR1 & TR2.

7. Construction Traffic

The application states that during construction of Phase 1 there will be in the region of 150 – 200 HGV movements daily, in addition it is expected to be in the region of 200 construction staff. Pack Hill will not cope with this kind of traffic and will result in "rat running" through Wanborough village and surrounding area.

In addition Phase 2 is expected to take around 5 years to complete. With the traffic from phase 1 industrial unit and the traffic from construction traffic for phase 2 will result in a complete stand still for Wanborough, isolating the village off and making it extremely difficult to carry out daily life.

8. Planning Classification B1c

Phase 1 is the proposed development of a 30,000 sqm warehouse, for which the stated use will be "light industrial" (class B1c) for use by Wasdell Packaging. However Parish Council question whether the proposed site should be classified under planning classification B8 as "storage and distribution". The level of storage (racking) and distribution services (as indicated above, the plans show two lorry loading bays for ingoing deliveries and four lorry loading bays for outgoing deliveries, plus driver facilities) is indicative of substantially more than being merely ancillary to any industrial processing (packaging) activities. It also states in the Transport Assessment (August 2018 Appendix B page 1) that Phase 1 comes under classification "B8", and Parish Council therefore question why has this changed from B8 in the August 2018 report to B1c in the November 2018 report?

9. Protected route of the Canal

SBC's Local Plan 2026 policy EN11, states that the Wilts & Berks Canal route shall be safeguarded, ensuring:-

- Development protects the integrity of the canal alignment, and
- Associated infrastructure of development does not prejudice the delivery of the canal.

This proposed development has re-aligned the route of the canal so that it is now pushed right up next to the Southern Connector Road (SCR). Not only will this result in a number of sharper bends along the canal route, which would appear to be unsuitable for canal boats, but it would also result in additional infrastructure (two extra bridges) increasing the cost and viability of delivering the canal. **This is contrary to SBC's Local Plan 2026 policy EN11.**

10. Noise and Light Pollution

Wasdell Packaging are a 24/7 working industrial unit, there will therefore be a continuous noise from the site which will have a detrimental impact on the peace and quiet of a rural setting.

In addition there is considerable amount of lighting on site for both security and working of the industrial unit again this will have a detrimental impact on the rural setting and also the setting of the North Wessex Downs AONB.

11. Water Supply and Waste

Thames Water have confirmed that there is currently insufficient supply of water and waste capacity to cope with this development without a considerable improvement and funding towards the infrastructure, and this is confirmed in their e-mail dated 4th January 2019 to SBC. Thames Water are considering and planning for the water supply for the NEV but this is in the very early stages and unlikely to be able to accommodate this proposal, this proposal could have a detrimental impact on the delivery of water and waste to the NEV. There is therefore currently no solution to be able to supply water to this site to meet the proposed timetable that Wasdell Packaging are asking.

12. Science Park

The applicant names the overall application as a "Science Park", however Phase 1 is purely a large industrial unit for Wasdell Packaging to relocate to; there is no "Research and Development" proposed within Phase 1.

Phase 2 (outline) includes another large industrial unit for Wasdell Packaging to expand into, plus a small number of units for "R & D". Phase 2 is "indicative" which is open to change in the future and there are currently no "R & D" companies who have shown any interest in re-locating or setting up a business in Swindon. The "Science Parks" that are given as examples within the application, at Reading, Bristol, Oxford, and Cambridge, are all located in areas that have a university within close proximity. Using the term "Science Park" to make the application sound far better than it actually is should not override all planning protocol to the detriment of rural open countryside.

13. Phase 2

There has clearly been some major changes to what the applicant is proposing within Phase 2, included within the Transport Scoping Note (October 2017), the applicant includes plans for a Petrol Station, Hotel, Pub, Restaurant & Retail area, the revised plans within the Transport Assessment (November 2018) has removed these proposals, however, as Phase 2 is an "Outline"

planning application and “indicative” it is possible that it could change in the future and Parish Council are concerned that if they do gain permission then these items on their “wish list” could re-appear at a later date.

Parish Council are not against bringing new business to the area for the benefit of Swindon and this is evidenced by the considerable number of years that has been spent liaising with SBC in relation to the New Eastern Villages proposals, which cover a large part of Wanborough Parish.

This application however completely ignores the due process of Swindon’s planning; the application is opportunist, contrary to a large number of SBC’s Local Plan Policies and National Planning Polices, and for that reason should be refused. Allowing an application that clearly doesn’t comply with planning policy will set a precedent for other areas of Swindon and make a complete mockery of Swindon Borough Council’s Local Plan 2026.

Parish Council urge Swindon Borough Council to refuse this application on the grounds that it does not comply with SBC’s Local Plan 2026 Policy NC3, SD2, EN5, EN10, EN11, TR1, TR2 and National Planning Policy Framework paragraphs 109, 111, 170 and 172.

Wanborough Parish Council will continue to review this application and confirm they will raise additional comments if required, Parish Council also request that SBC keep them updated with the progress of this application.

Yours Sincerely

Angela Raymond

Clerk to Wanborough Parish Council

Cc Robert Buckland MP