

COMMITTEE REPORT

Item Number:

Application Number: S/OUT/18/1943

Ward: Ridgeway

Parish: Wanborough

Proposal: 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).

Location: Inlands Farm, The Marsh, Wanborough, Swindon, SN4 0AS

Case Officer: Mr Edward Snook

Agent:

Mr Peter Lawson
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Applicant:

Mr Martin Tedham
Wasdell Properties Ltd
1-8 Euroway Industrial Estate
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Swindon
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Officer Report

1 Background

- 1.1 This application relates to land at Inlands Farm and has been brought before Planning Committee as it is of a strategic scale and comprises a significant departure from the Swindon Borough Local Plan 2026, which forms the principle development plan document for Swindon.

2 Summary of Recommendation

- 2.1 That full planning permission for 33,507 sqm (GIA) of Use Class B1c (light industrial), with associated access, parking, landscaping and drainage be **REFUSED** for the reasons set out at the end of this report.
- 2.2 That outline permission 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) be **REFUSED** for the reasons set out at the end of this report.

3 Proposal

- 3.1 The proposal is to develop the site for Class B (light industrial and research and development purposes), with associated access, parking and landscaping. In total, this includes up to 49,907 square metres ('sqm') of Class B1c (light industrial) floorspace and up to 32,281 sqm of Class B1b (research and development).
- 3.2 The proposal is a 'hybrid' planning application meaning that Phase 1 of the application, which includes a Class B1c (light industrial) building of up to 33,507 sqm forms a full planning application and is therefore accompanied by full details including the layout, scale, access and appearance of the development. Phase 2 of the proposed development which consists of the remaining 16,400 sqm of Class B1c (light industrial) and 32,281 sqm of Class B1b (research and development) is an outline application with matters reserved for subsequent approval.

Full Planning Application

- 3.3 Full planning permission is sought for the erection of an industrial building with associated parking, delivery area, and landscaping. The full application proposes to deliver the full access to the Science Park including Phase 2, and will link in with the Southern Connector Road (SCR), forming a new arm on the proposed roundabout. This element of the application also indicates how the canal could connect through the site from the western boundary to the south.
- 3.4 The proposed building would be approximately 165m (north to south) and 175m (east to west), and 14.5m in height. In terms of appearance, the elevations are broken up in to a number of blocks, separated by a recess and would be constructed from metal panelling in various shades of green and brown. The west elevation would form the main entrance and also consist of polycarbonate cladding. The roof would contain solar panels and sections of green roof. The main building would be located adjacent to Pack Hill, separated by a woodland belt which would run along the southern and eastern edges of the Phase 1 site. Associated car parking, delivery areas and driver facilities would be positioned to the north and west of the main building.

Outline Planning Application

- 3.5 Outline planning permission is sought for the remainder of the Science Park. The submitted plans illustrate an indicative layout of how these could come forward, however all details are reserved for subsequent approval.
- 3.6 The application includes parameter plans which state that the proposed buildings within the outline element would be located in zones around the site. Zone A indicates a building, similar in nature to that included in Phase 1, with a maximum

height of 14.5m. The remainder of the buildings within Phase 2 would generally be smaller in scale with a maximum height of 3 storeys. The indicative proposals suggest each of the building clusters would have individual parking areas and be separated by landscaped areas.

- 3.7 A series of Public Rights of Way (PRoW) would be realigned and incorporated in to the strategic landscape proposals. An attenuation pond would be located towards the north-west corner of the application site, whilst land to the south-east corner is proposed to remain free from development.
- 3.8 For the avoidance of doubt, where this report discusses the 'proposed development' it is referring to both the full (Phase 1) and outline (Phase 2) elements of the planning application.

4 Site and Surroundings

- 4.1 The application site is on agricultural land located to the east of Swindon. The 38ha site is north of Pack Hill and approximately 0.45 kilometres (km) north-east of Commonhead Junction and the A419. Wanborough is located approximately 0.2km to the east, whilst the villages of Liddington, Hinton Parva, Bishopstone and Bourton are located further to the south and east.
- 4.2 The site is rural in character and consists of a number of agricultural field parcels, separated by hedgerows. The Marsh and Pack Hill run along the western and southern boundaries respectively. Liden Brook, a tributary of the River Cole, runs to the west of the application site. The site is predominantly flat to the west and gradually rises towards Upper Wanborough in the east.
- 4.3 The application site abuts the North Wessex Downs Area of Outstanding Natural Beauty (AONB), which is located immediately to the south of the site. The site is also located within the Vale of the White Horse Landscape Character Area.
- 4.4 The Upper Wanborough Conservation Area boundary is located approximately 50m from the south-east corner of the application site; whilst the Lower Wanborough Conservation Area lies approximately 0.4km to the east. There are no listed buildings within the application site, with the closest located in Upper Wanborough and on The Marsh. There are known areas of archaeology within and adjacent to the application site.
- 4.5 Liden Brook County Wildlife Site is located to the north and west of the application site. Warneage Wood, which is a 19ha woodland area owned by the Woodland Trust, is located to the north of the application site.
- 4.6 There are two Sites of Special Scientific Interest (SSSI) within the surrounding area, including Coate Water located approximately 1.7km to the west of the application site, whilst the The Coombs, Hinton Parva lies 2.4km to the east.

- 4.7 The application site contains two trees (T2 - L. Poplar & T3 – Ash) that are subject to Tree Preservation Order (TPO).
- 4.8 There are a number of Public Rights of Way (PRoW) running through and adjacent to the site, connecting The Marsh and Pack Hill to land beyond the northern and eastern boundaries of the application site.
- 4.9 The site lies outside of the Swindon Urban Area Boundary and Wanborough Settlement Boundary, as defined by the Swindon Borough Local Plan 2026 (Local Plan) and Policies Map, and is not allocated for development. The application site is located approximately 0.5km to the south of the New Eastern Villages (NEV) Strategic Allocation boundary, as defined by Policy NC3 of the Local Plan. The north western extent of the site is identified (on the Local Plan Proposals Map) as falling within the Non-Coalescence Area associated with the Local Plan Policy NC3. Policy NC3 also identifies the Southern Connector Road (SCR) to serve the NEV strategic allocation, a part of which is located in the south-west part of the application site.
- 4.10 For the avoidance of doubt, Wanborough village consists of both Upper Wanborough and Lower Wanborough, but is generally referred to as a single village of 'Wanborough'. This report refers to 'Wanborough' as the entire village, and where relevant will refer to each part individually ie. Upper Wanborough and Lower Wanborough.

5 Site History

- 5.1 The application site consists of farm buildings and agricultural land. There have not been any significant planning applications on the site which are considered to materially impact the proposal.
- 5.2 An application for the Southern Connector Road (SCR) was approved on 23rd December 2019. The SCR will be a new 7.3 metre wide single carriageway road, approximately 2.5km in length. Part of the SCR is located within the application site at Inlands Farm. This element includes a new roundabout to form a junction between Pack Hill and the proposed new road. The SCR is required through Policy NC3 of the Local Plan to support the delivery of a comprehensive and sustainable mixed-use urban extension including about 8,000 homes at the NEV, including the expansion of South Marston village and Rowborough.

Pre-application

- 5.3 As referred to within the submitted Planning Statement (November 2018), a formal planning pre-application was submitted to the Local Planning Authority (LPA) in October 2017. This pre-application proposed full permission for a 33,543 sqm of Use Class B1(c) along with a temporary new vehicular access from Pack Hill and outline permission for up to 81,415 sqm employment floorspace (mixture

of Class B1, B2 and B8 uses) and 3,710 sqm roadside facilities, together with associated landscaping, parking and a proposed new permanent vehicular access off the SCR.

- 5.4 The feedback to the submitted pre-application acknowledged that Wasdell are an important local company which the Council would want to retain in the Borough. The LPA advised that the proposed development in this location would be a major departure from the adopted Local Plan, with the key policy objections being the proximity to the North Wessex Downs AONB, the siting within the non-coalescence area identified within Policy NC3 of the Local Plan, and that the proposal lacks a comprehensive sustainable approach to planning as an extension of the NEV. Additional concerns were raised with respect to landscape impact and the speculative nature of the proposed development.
- 5.5 Officers advised that given the proposed development would be a departure from the adopted Local Plan, that the site should be promoted through the Local Plan Review prior to any planning application being submitted. Further, that the applicant would also be required to demonstrate that a need for the development in its totality is justified at this site, and that all the possible alternatives of project design and sites have been properly addressed prior to selecting a preferred alternative. Based on the information submitted as part of the pre-application, Officers were not content that the benefits of the proposal would outweigh the harm arising from the departure from the adopted development plan.

6 Environmental Impact Assessment (EIA)

- 6.1 A request for a scoping opinion was received by the Local Planning Authority (LPA) in August 2018 in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. To determine the matters to be included within the Environmental Statement (ES) the LPA undertook consultation with stakeholders including statutory agencies such as Historic England, Highways England and the Environment Agency. The LPA issued a scoping opinion in October 2018 to advise on the matters to be addressed.
- 6.2 Accordingly, the planning application was accompanied by an Environmental Statement (ES) as required under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The applicant opted to submit additional information, including a revised ES in April 2020, which was subject to a further public consultation.
- 6.3 The ES describes the environmental effects of the construction and operation of the scheme and identifies the adverse and beneficial impacts together with the measures (mitigation) that are proposed to avoid, reduce or offset these effects. A non-technical summary is also included in the submission that summarises the main points of the ES and its findings for each of the environmental topics covered.

- 6.4 The location of the application site within proximity to the NEV strategic allocation is such that any potential impacts arising from the proposed development should be considered cumulatively alongside other development in the area.
- 6.5 Chapter 19 of the ES has evaluated the cumulative impacts of development for both construction and operational phases. It assess the likely cumulative effects from the proposed development on heritage, landscape, socio-economic, ecology, drainage and air quality. In terms of the inter-combination assessment it concluded there would be beneficial effects for economic activity and employment opportunities and adverse impact on local landscape character and the availability of farmland habitats.

7 Consultation

- 7.1 The hybrid planning application was validated by the LPA on 14th December 2018. In line with the EIA regulations, a 30 day public consultation was undertaken with the deadline for comments being 22nd January 2019.
- 7.2 Following consultee comments, officers raised a number of concerns with the applicant, including the principle of the development in this location.
- 7.3 The applicant submitted further information in relation to specific matters raised from the first consultation. Notwithstanding the in principle concerns with the schemes, Officers agreed to consult further so that the information could be considered. A further public consultation took place on 6th May 2020.

8 Representations

- 8.1 The summarised comments below relate to the most recent responses from the consultee or stakeholder. A full schedule of summarised comments is provided at the end of this report at Appendix A.

Statutory and External Consultees

- 8.2 Environment Agency: Object to the application because of the risk of pollution to the water environment. Insufficient information has been submitted to demonstrate that the risks of pollution posed to water quality can be safely managed. Recommend that the planning permission be refused. The EA advise that if the Council are *“minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection”*.
- 8.3 Highways England: Requested additional information and issued a direction of non-approval for 6 months on 8th April 2020. The response also states that the event that in the Council disagree with the recommendation from Highways England, the Council should consult with the Secretary of State.

- 8.4 Historic England: Raise concerns with the proposed development principally due to the harm caused by the proposed development to the significance of the Upper Wanborough Conservation Area (UWCA), through development within its setting. Historic England consider the impact on the setting of the UWCA would be greater than 'minor adverse', as identified within the application submission.
- 8.5 Natural England: Refer to the relevant planning policy and legislation in relation to protection of Areas of Outstanding Natural Beauty (AONB) and ask that great weight be given (but not limited) to the stakeholder responses from the Council's Conservation Officer, Planning Policy Officer and Landscape Officer, as well as the North Wessex Downs AONB Board.
- 8.6 North Wessex Downs AONB: Object to the proposed development on the grounds that it would suburbanise this edge of the AONB which would fail to conserve and enhance the character and quality of the AONB landscape and its setting, contrary to Local Plan Policy EN5, NWD Management Plan Policy DE01 and Para 172 of the NPPF. The revised proposal would result in an incongruous built form within open countryside which would not provide any benefits that outweigh the harm to the AONB and its setting and thus fails to meet the requirements of Para 172 of the NPPF.
- 8.7 Thames Water: Have advised that some capacity is available within the existing foul water and water network, however not enough for the entire proposal. Planning conditions have been recommended to limit the amount of floorspace capable of being delivered until the existing foul water and water networks have been upgraded with increased capacity.
- 8.8 Wiltshire Police: Concerned that the proposed development fails to demonstrate that crime prevention has been sufficiently considered as part of the design and layout of the scheme.
- 8.9 Woodland Trust: Object to the proposed development on the grounds that it would have an adverse impact on Warneage Wood, located adjacent to the application site.

Internal Consultees

- 8.10 Arboriculture: No objection, subject to conditions.
- 8.11 Archaeology: Insufficient information has been submitted as part of the application to demonstrate that the proposed development, including the quantum of floorspace, can be delivered at the application site, whilst ensuring an area of archaeology is preserved in situ.
- 8.12 Biodiversity: Requests significant woodland planting to address the objectives of the Great Western Community Forest and a planning condition requiring a

Landscape and Ecological Management Plan should the application be recommended for approval.

- 8.13 Conservation: Objects to the proposed development on the grounds that it would cause irreversible harm to the surrounding designated heritage assets and open countryside which forms an integral component of the setting of these assets, contrary to Policies DE1 and EN10 of the Local Plan and the NPPF.
- 8.14 Ecology: Requests additional clarification with regard to great crested newts, dormice and arboricultural matters are still required, as is further documentation in relation to biodiversity net gain.
- 8.15 Environmental Health (Contamination): No objection.
- 8.16 Environmental Health (Pollution and Air Quality): Insufficient information has been submitted to demonstrate that the proposed development would not have an adverse impact on the amenity levels of a neighbouring property, particularly in terms of noise, vibration and air quality from construction.
- 8.17 Landscape: Object to the proposed development on the grounds that it would form a substantial and incongruous addition to the rural landscape, adversely affecting the existing landscape character, visual amenity and North Wessex Downs AONB, contrary to Policy EN5 of the Local Plan and the NPPF.
- 8.18 Lead Local Flood Authority (LLFA): No objection in principle, subject to further information.
- 8.19 Local Highway Authority (LHA): Insufficient information to demonstrate that Phase 2 of the proposed development would not adversely impact the Strategic Road Network.
- 8.20 Policy: Object to the proposed development on the grounds that it would form a major departure to the adopted Local Plan. The proposal would be contrary to the development strategy outlined within Policy SD2 and conflict with the area of non-coalescence as required by Policy NC3.
- 8.21 Urban Design: Object on the grounds that it would have a negative impact on the existing and future context and character of the area, the negative impact it would have to the character of Upper Wanborough and the proposal's inability to integrate itself with the wider strategic and comprehensive masterplanning of the New Eastern Villages, contrary to Policies DE1 and NC3 of the Local Plan.

MP

- 8.22 Robert Buckland MP: Objects to the proposed development on the grounds that it would be located outside of the Local Plan development boundaries, located

within the area of non-coalescence and that it fails to conserve the landscape character and AONB in accordance with Policy EN5 of the Local Plan.

Ward Councillors:

- 8.23 Cllr Sumner (Ridgeway): Objects to the proposed development on a number of grounds including that the site remains outside of the adopted Local Plan (for development purposes), the robustness of the submitted site assessment information, the adverse impact in terms of traffic and amenity, development within the non-coalescence area, and the impact on landscape character and visual amenity.
- 8.24 Cllrs K & B Parry (Covingham): Object to the proposed development on the grounds that it would not accord with the Local Plan, would adversely impact the AONB and result in traffic and highway safety concerns.

Parish Councils (Swindon Borough unless stated):

- 8.25 Wanborough Parish Council: Object to the proposed development on the grounds that it would be contrary to the Local Plan, would compromise the area of non-coalescence, would harm the landscape including the AONB and heritage assets, result in a loss of character to existing footpaths, increase traffic and pollution and exacerbate existing flooding issues.
- 8.26 Bishopstone Parish Council: Object to the proposed development on the same grounds as Wanborough Parish Council.
- 8.27 Bourton Parish Council (Vale of White Horse): Object to the proposed development on the grounds that it would contravene national planning policy, and the Local Plan, particularly in relation to the AONB and non-coalescence area. Also have concerns that the proposal does not represent a Science Park and the impact on traffic levels.
- 8.28 Covingham Parish Council: Object to the proposed development on the grounds that it would be contrary to the Local Plan as it is outside of the settlement boundary, within proximity to the AONB, would prejudice the canal alignment and would increase flood risk.
- 8.29 Liddington Parish Council: Object to the proposed development on the grounds that it would be contrary to the Local Plan, would compromise the area of non-coalescence, would harm the landscape including the AONB and heritage assets, increase traffic and pollution and would not represent a Science Park.
- 8.30 Shrivenham Parish Council (Vale of the White Horse): Object to the proposed development on grounds that it would represent a large factory in the countryside,

would impact the amenity levels in terms of pollution and would increase traffic on the A420 and A419.

- 8.31 South Marston Parish Council: Object to the proposed development on the grounds that it would block aspirations for an off-road cycle path from north to south through the NEV and would be located within the area of non-coalescence.
- 8.32 South Swindon Parish Council: Object to the proposed development on the grounds that the proposal would be contrary to the development plan and would impact the character of the AONB. Also have concerns with traffic generation and suggest that the applicant works with The Council to find an alternative site.

Third Party Representations:

- 8.33 Bassaire Cleanrooms Ltd: Two letters of support were received from Bassaire. They support the proposed development because as a supplier and contractor for Wasdell it would enable them to continue receiving work from Wasdell.
- 8.34 Cambridge Sensors Ltd: Support the proposed development as it would enable Wasdell to expand the business.
- 8.35 Campaign to Protect Rural England (CPRE): Object to the proposed development on the grounds that employment uses should be at allocated sites, that there are better alternative sites available and that there would be adverse traffic impacts.
- 8.36 County Recruitment: Support the proposed development as it would allow County Recruitment to continue supplying Wasdell with staff.
- 8.37 Covingham Flood Group: Raise concerns that the proposed development could increase the flood risk to Covingham.
- 8.38 Envair Projects: Support the proposed development on the grounds that it would safeguard and increase local employment.
- 8.39 Ramblers Association: Object to the proposed development on the grounds that it is contrary to the Local Plan and that the rural character of the public footpaths crossing the site would be irretrievably lost.
- 8.40 Residents (Object): 542 letters of objection were received from residents in relation to the initial consultation of the application (December 2018). 586 letters of objection were received from residents in relation to the revised consultation of the application (May 2020). The primary reasons for objecting to the application include:
 - The proposal would be located within the area of non-coalescence, contrary to Policy NC3.

- The proposed development is contrary to Policy DE1, in that the scale, design and appearance would not be appropriate for its context or respect the existing features.
- The proposed development will adversely affect the setting of heritage assets, including the Upper Wanborough Conservation Area.
- The proposed development would spoil the character of Wanborough village and the surrounding landscape, which includes the North Wessex Downs AONB.
- The proposed development would substantially increase the traffic levels of cars from employees and HGV's on the local network
- There is no evidence provided to justify why the proposed development cannot be located at other sites in Swindon.
- The proposed development would operate 24 hours a day, causing noise and light disturbance to nearby residents.
- The proposed development does not represent a Science Park.
- The proposed development does not fall within the use classes proposed.
- There is currently an insufficient provision of waste and utilities infrastructure.

8.41 Residents (Support): One letter of support was received from a resident in relation to the initial consultation of the application (December 2018). One letter of support was received from a resident in relation to the revised consultation of the application (May 2020). The primary reasons for supporting the application include:

- Many jobs at Wasdell and at nearby suppliers will be consolidated.
- The Science Park represents an opportunity to bring hi-tech jobs to Swindon.
- The proposed scheme has been designed to take account of the abutting AONB.
- An area has been preserved for both the future routing of the Wilts and Berks Canal and Southern Connector Road.
- The Wasdell development offers the best opportunity for the village to retain a distinct identity from the town, while supporting the wider economy.

8.42 South Swindon Protection Group (SSPG): Object to the proposed development on the grounds that it would be contrary to the Local Plan, would compromise the area of non-coalescence, would harm the landscape including the AONB and heritage assets, increase traffic and pollution and would not represent a Science Park.

8.43 Snack and Sandwich Company Ltd: Support the proposed development. As a supplier of Wasdell think it is important that they expand the business and bring economic benefits to Swindon.

8.44 Swindon Stargazers: Have concerns that the proposed development would

increase the light pollution to the sky, impacting the dark skies.

- 8.45 Thrings: Support the proposed development. As a supplier of Wasdell think it is important that they expand the business and bring economic benefits to Swindon.
- 8.46 Wanborough Anti-Flood Group: Objects to the proposed development on the grounds that the proposed development will worsen existing flood issues and would increase traffic issues in the local area.
- 8.47 Wasdell Employees: 335 letters of support were received from Wasdell employees on the grounds that the proposed development would secure jobs in Swindon and for surrounding suppliers.
- 8.48 Wilts & Berks Canal Trust: Object to the proposed development on the grounds that it would prejudice the delivery of the proposed canal route, contrary to Policy EN11.

9 Planning Policy and Statutory Considerations

- 9.1 Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise as required by section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.
- 9.2 Where a development proposal affects a listed building or its setting, section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers to have special regard to the desirability of preserving the building or its setting or any features of special interest.
- 9.3 Where a development proposal affects a conservation area, section 72 of the Planning (Listed Buildings and Conservation Areas) Act requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas.
- 9.4 The North Wessex Downs Area of Outstanding Natural Beauty (AONB) is protected by the Countryside and Rights of Way Act 2000 (CROW Act) and protects the land to conserve and enhance its natural beauty.
- 9.5 Regulation 122 of the Community Infrastructure Levy Regulations 2010 sets out the statutory tests for the relevance of planning obligations to the determination of planning applications.
- 9.6 The planning policy context is set out below, together with the key planning considerations relating to this proposal. The development plan for this application consists of the Swindon Borough Local Plan 2026 (adopted March 2015) and the Wiltshire and Swindon Waste Core Strategy (2009).

9.7 The Swindon Borough Local Plan 2026 was adopted by Swindon Borough Council on the 26th March 2015. The policies of the Swindon Borough Local Plan 2026 (Local Plan) relevant to this application are:

- SD1: Sustainable Development Principles;
- SD2: Sustainable Development Strategy;
- SD3: Managing Development;
- DE1: High Quality Design;
- DE2: Sustainable Construction;
- EC1: Economic Growth through Existing Business and Inward Investment;
- EC2: Employment Land and Premises (B-Use Classes)
- TR1: Sustainable Transport Networks;
- TR2: Transport and Development;
- IN1: Infrastructure Provision;
- IN2: Water Supply and Wastewater;
- CM2: Active; Healthy and Safe Lifestyles;
- EN1: Green Infrastructure Network;
- EN2: Community Forest;
- EN4: Biodiversity and Geodiversity;
- EN5: Landscape Character and Historic Landscape;
- EN6: Flood Risk;
- EN7: Pollution
- EN9: Contaminated Land;
- EN10: Historic Environment and Heritage Assets;
- EN11: Heritage Transport; and
- NC3: New Eastern Villages.

9.8 It should also be noted that the current Local Plan for the Borough of Swindon for the period to 2036 is under Review. Swindon Borough Council has published the Regulation 19 Proposed Submission Draft Version of the Local Plan for public representations. The consultation period closed 31 January 2020.

9.9 The policy of the Wiltshire and Swindon Waste Core Strategy relevant to this application is Policy WCS6 'Waste Reduction and Auditing'.

Material Considerations

Use of the proposed development

9.10 The submitted application relates to a mixed use with defined floorspaces for both Class B1b (research and development) and Class B1c (light industrial), as identified within The Town and Country Planning (Use Class) Order 1987 ('UCO'). In both cases, the use must be capable of being carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell,

fumes, smoke, soot, ash, dust or grit.

- 9.11 The UCO further defines “industrial process” (as referred to within the Class B1c) as a process for or incidental to any of the following purposes:— (a) the making of any article or part of any article (including a ship or vessel, or a film, video or sound recording); (b) the altering, repairing, maintaining, ornamenting, finishing, cleaning, washing, packing, canning, adapting for sale, breaking up or demolition of any article; or (c) the getting, dressing or treatment of minerals.
- 9.12 Given the scale and nature of the proposed scheme, Officers have concerns as to whether the proposed development would be capable of being carried out within a residential area, and therefore whether it would fall under Class B1c. In addition, the submitted Wasdell GF (P11) and FF (P6) Floor Plans identify activities such as picking, storage, racking and production as well as offices and staff facilities. The key consideration is whether sufficient information has been submitted to demonstrate that an ‘industrial process’ is being undertaken on site, or whether other operations which fall within another Use Class not applied for would be taking place.
- 9.13 Given the concerns Officers have outlined above, further evidence was sought from the applicant to justify the uses proposed (Letter dated 2nd April 2019; and emails dated 1st May 2019 and 27th March 2020). The applicant submitted a covering letter and photos (dated 10th April 2019) outlining that *“The principal operations at the new site will comprise high tech drug testing and packaging”* and *“Any storage of ‘raw’ products and materials is clearly ancillary to this process”*. This letter also refers to Wasdell – Our Economic Impact (November 2018) which was submitted as part of the original submission. The covering letter (dated 24th April 2020) submitted alongside the revised submission reaffirms the applicants view that the proposed development falls within the use classes proposed.
- 9.14 In reference to whether the proposed development would be an industrial process, the photos submitted relate to Wasdell’s current operations, although given the planning consent is for an open planning consent for B1b/B1c, there is no guarantee Wasdell would ultimately be the occupiers of the site and that these operations would take place. Further to this, the Executive Summary within the ‘Wasdell – Our Economic Impact’ states *“The Wasdell Group is one of Europe’s largest and most experienced contract packaging suppliers. Since 1971, the company has served the healthcare, pharmaceutical and veterinary markets and today ships to 47 countries around the world”*, which suggests Wasdell is involved with a range of activities including packaging and distribution. It also states that the storage and distribution services are currently undertaken at Burnley and Swindon (page 9). The submitted Economic Impact Statement (November 2018) states that it is the applicants intention that all operations from the current Burnley and Swindon sites would be relocated to the proposed Swindon Science Park (SSP). Were Wasdell to occupy the proposed development, this suggests that all of their storage and distribution activities would be relocated to operate from the

proposed Science Park.

- 9.15 The submitted floor plans identify sections of production, which suggest that at least, in part, an 'industrial process' would be taking place. Alongside this, ancillary areas for storage and some deliveries would be expected. The floor plans do however, identify significant areas of storage as well as some loading bays for HGVs. Whilst it appears that an industrial process would be taking place, the submitted information also suggests its entire storage and distribution service would also be taking place at the Swindon Science Park. Given that this includes shipping to over 47 countries, Officers consider this is unlikely to be an ancillary use, and that at least in part, significant storage and distribution operations would also be taking place were Wasdell to implement the planning consent. These operations are not considered to fall within the Use Classes applied for.
- 9.16 With respect to whether the proposed development would form 'light industrial', whilst the application site is located within the countryside, Officers must consider whether the proposed development, would be capable of being accommodated within a residential area, as stated within the UCO. The scale of the proposed development, combined with the nature and likely noise and activities, including HGV deliveries, machinery and operations 24-hours a day, leads Officers to conclude it is unlikely that this type of use would be capable of being accommodated within a residential area, and therefore would not fall within Class B1c. Overall, Officers consider that insufficient justification has been submitted to demonstrate the proposed development falls within Use Class B1c, as requested through the description of development.
- 9.17 Under the recently announced changes to the UCO taking affect from 1st September 2020, uses B1a/b/c are included with the new use class E alongside retail, financial, restaurants, health and day care centres and some indoor recreation uses. This means from that date, a change of use within this new E-use class would not require planning permission. This could result in other unforeseen uses for the site and resulting consequences particularly for transport. Within the revised Order, Class E reiterates the need for the proposed use to be capable of being carried out within a residential area, without detriment to the amenity of that area.

National Planning Policy Framework (NPPF) (2019)

- 9.18 Material considerations that are relevant in the determination of this application include the National Planning Policy Framework (NPPF) (February 2019, as amended June 2019) and national Planning Practice Guidance (PPG). In addition, the adopted Supplementary Planning Documents (SPDs) relating to development within the NEV are material considerations.
- 9.19 The NPPF details the national planning policies for England. It sets out the presumption in favour of sustainable development to ensure that a development

proposal that accords with an up-to-date development plan is approved without delay. The planning system performs three roles in achieving sustainable development, namely the economic, social and environmental.

- 9.20 Paragraph 20 of the NPPF requires strategic policies to outline a strategy for development, ensuring sufficient provision is made for housing, employment and the commercial development; infrastructure for transport and community facilities; as well as the conservation and enhancement of the natural, historic and built environment including landscapes.

- 9.21 Paragraph 80 of the NPPF states:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”

- 9.22 Further to this Paragraph 84 states:

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

- 9.23 The application site is located outside of the Swindon urban area and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty (‘AONB’). NPPF Para 170 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the*

- economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
 - d) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
 - e) *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
 - f) *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

9.24 Further to this, the primary chapters of relevance in the NPPF include:

- 6. Building a strong, competitive economy
- 9. Promoting sustainable transport
- 14. Meeting the challenge of climate change, flooding and coastal change
- 15. Conserving and enhancing the natural environment
- 16. Conserving and enhancing the historic environment

9.25 The Planning Practice Guidance (PPG) provides additional advice on the principles brought through the NPPF.

Supplementary Planning Documents (SPDs)

9.26 The Council has adopted a number of Supplementary Planning Documents (SPDs) which are material considerations for the purpose of making planning decisions on applications within the New Eastern Villages (NEV). These include:

New Eastern Villages Planning Obligations Supplementary Planning Document (2016)

The Planning Obligations SPD provides detailed advice and guidance on the relevant policies in the Local Plan, in particular Policies IN1 (Infrastructure Provision), SD3 (Development Management), NC3 (New Eastern Villages) and RA3 (South Marston). This SPD provides further information to understand the necessary infrastructure to support development proposals at the NEV and in the context of achieving comprehensive development across the whole site. In particular it provides guidance on the proposed Southern Connector Road (SCR).

Inclusive Design Access for All Supplementary Planning Document (2011)

- 9.27 The inclusive Design SPD seeks to ensure all development achieves high quality and inclusive design.

Landscape Character Areas

- 9.28 A number of adopted Swindon Conservation Area Appraisal and Management Plans are of relevance to this application, including Upper Wanborough (May 2006), Lower Wanborough (February 2009) and Liddington (April 2006). 'The Setting of Heritage Assets' (December 2017) produced by Historic England is also of relevance.

Swindon Economic Strategy to 2026 (June 2017)

- 9.29 The Swindon Economic Strategy sets out a strategy and action plan for the Borough of Swindon, capturing the commitments from key stakeholders to create conditions to boost economic growth and deliver beneficial changes to Swindon's economy.

Community Infrastructure Levy (CIL) Charging Schedule (March 2015)

- 9.30 Swindon Borough Council adopted the Community Infrastructure Levy (CIL) Charging Schedule on March 2015 which became effective from 6th April 2015.

Wanborough Neighbourhood Plan

- 9.31 A Regulation 14 consultation was undertaken on the Wanborough Neighbourhood Plan (WNP) in 2014. The Council provided comments at this stage, however the preparation of the WNP has stalled and has not been progressed further.

A Green Future: Our 25 Year Plan to Improve the Environment (HM Government)

- 9.32 Sets out the Government's goals for improving the environment and details how they will work with businesses and communities to achieve this.

Phasing

- 9.33 Chapter 4 of the ES states that the proposed development is anticipated to commence in 2020, with the first phase of development (ie. the Wasdell factory included within the full planning application element of the submission) operational in 2021. The remaining units to serve the Wasdell Group and additional research and development units would be completed in 2025.

Principle of Development

Compliance with the Local Plan

- 9.34 Policy SD1 of the Local Plan sets out the sustainable development principles that underpin the Local Plan. These are in the form of eight sustainable development criteria which seek to deliver the Sustainable Development Strategy identified within Local Plan Policy SD2. Policy SD3 of the Local Plan reflects the NPPF's presumption in favour of sustainable development and the need for a positive approach to considering development proposals.
- 9.35 The Development Strategy is clearly defined in Policy SD2 of the Local Plan. It seeks to concentrate development at Swindon within the urban area, and at allocated strategic sites including the New Eastern Villages (NEV). Policy SD2 allocates a total of 119.5ha of employment land (B-use Class), with 77.5ha of this total for additional land. The site is located outside of the Swindon Urban Area where development within the Borough should be concentrated in accordance with Policy SD2, and as such would be a significant departure from the adopted Local Plan.
- 9.36 Paragraph (c) of the policy states that development in rural and countryside locations will be permitted where allocated through a Neighbourhood Plan; where it supports the expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in a rural service centre; or it is in accordance with other policies in the Local Plan permitting specific development in the countryside.
- 9.37 The proposed development is not in accordance with a made Neighbourhood Plan and does not comprise tourist and visitor facilities. No policy of the Local Plan provides specific support for the uses proposed in this application in countryside and rural locations. The proposed development is therefore contrary to Policy SD2 of the Local Plan.
- 9.38 Policy NC3 of the Local Plan states that the character and identity of the surrounding villages shall be protected by an area of non-coalescence.

e. The character and identity of Wanborough, Bishopstone and Bourton will be protected by a principle of non-coalescence between the settlements. The land between the New Eastern Villages site boundary and the existing villages shall remain part of the countryside. However, small scale development within this area, as defined on the Policies Map, will be permitted where it retains or enhances the existing character of the countryside and:

- involves the re-use, conversion or extension of existing buildings at a scale appropriate to their location, in accordance with the criteria specified in Policy DE1; or*
- is an essential requirement directly related to the economic or social needs of the rural community.*

- 9.39 A large part of the application site is located within the non-coalescence area, as identified on Figure 11 of the Local Plan. The proposed scheme does not involve the re-use or conversion of an existing building, nor is it related to the economic or social needs of the rural community. The application site and surrounding fields form a critical part of the non-coalescence area between the NEV and surrounding villages. The scale, siting and nature of the proposed development would erode the existing rural character and result in the gap between the rural settlements, the existing urban area of Swindon and the planned area of development at the NEV being filled. The proposed development would therefore be contrary to Policy NC3 of the Local Plan.
- 9.40 The submitted Planning Statement suggests this conflict with Policy NC3 would be lessened due to the proposed mitigation and the fact that the development would not result in coalescence. The purpose of the area of non-coalescence is to protect the character and identity of Wanborough, Bishopstone and Bourton. The Policy was drafted, examined and found sound with the knowledge of the requirement and indicative route of the Southern Connector Road (SCR). The area of non-coalescence forms an important spatial gap between the boundary of the NEV Strategic Allocation, as identified in Policy NC3 of the Local Plan. Unplanned development located within the gap between the boundary of the NEV and the existing villages has the potential to compromise the spatial relationship between these settlements. The proposals would represent a significant encroachment in to the countryside, detracting from the separate identity of the surrounding villages.
- 9.41 Policy SD2 seeks to guide development in accordance with a settlement hierarchy, increasing the sustainability of the settlements. Given there is a clear focus for employment to be located within Swindon, with a limited role proposed for those outside of Swindon, the proposed development represents a major departure from the Local Plan.
- 9.42 In light of its conflict with these policies, the proposed development would be in conflict with the development plan read as a whole and is a departure application. It is therefore necessary to consider whether other material considerations in favour of the grant of permission would be sufficient to outweigh that conflict.

Other Local Plan Policies

- 9.43 Local Plan Policy EC1 (Economic Growth through Existing Business and Inward Investment) states that the growth and retention of existing business will be facilitated by *“identifying new employment sites”* and *“supporting large inward investment proposals where there is significant net economic or social benefit”*. It goes on to state opportunities for *“specialist manufacturing in east Swindon will be particularly supported”*. Whilst this policy is supportive of the development of existing businesses, it does not itself support specific development proposals in the countryside.

- 9.44 As outlined earlier within this report, NPPF Paragraph 80 identifies the need to support economic growth and productivity, taking account of local business needs. The retention and growth of an existing employer in the Borough, is therefore a material consideration in favour of the proposed scheme.
- 9.45 The submitted Planning Statement (November 2018) suggests that the proposed development would not conflict with Policy SD2 of the Local Plan, on the basis that para c) allows for development within the countryside where it accords with other policies within the Local Plan. It goes on to suggest that *“EC1 part ‘a’ is, in effect, an ‘exceptions policy’ that allows for large scale inward investment to be developed in the countryside, where the social or economic benefits justify this”* (Para 6.27, Planning Statement). Officers disagree with this interpretation. As outlined within the Planning Policy Officer’s comments (March 2019), *“The argument that Policy EC1 is such a policy and is in effect an exception policy is not supported. Policy EC1 does not specifically support development in the countryside unlike Policies EC4, HA5, HA6 and HA7 which are the intention of the third clause to SD2c(iv)”*.
- 9.46 The submitted Planning Statement (November 2018) suggests that with regard to this application, policies of the Local Plan, including Policy SD2, are out of date; and references the Suffolk Coastal and Cheshire East judgement (page 37). As outlined within the Planning Policy Officers’ comments (March 2019), Officers do not agree with the applicants suggestion that the Local Plan is out of date in this context. Unlike housing, there is no test for employment land in the NPPF. The assertion that employment land policies, or any others, are out-of-date because they cannot meet the specific requirements of a particular user is not considered sustainable. As a consequence, Officers disagree with the applicant’s suggestion and consider that the ‘tilted balance’ is not relevant. In any event, the ‘tilted balance’ cannot be applied where there is a conflict with policies of the NPPF relating to sites identified in footnote 6, in this case the AONB and heritage assets. Also, even if Officers accepted the Development Plan is out of date, Paragraph 11 of the NPPF directs the decision maker to grant planning permission unless the NPPF provides a clear reason for refusing the proposed development or the adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole.

Retention of local businesses within Swindon

- 9.47 The Economic Impact Statement (November 2018) outlines Wasdell’s intention to relocate their current operations in Swindon and Burnley to the Swindon Science Park (SSP). The submitted Planning Statement (November 2018) and Economic Impact Statement (November 2018) suggest that Phase 1 of the proposed development would accommodate the relocation of 600 existing Wasdell employees as well as an expansion in operations to create a further 600 FTE jobs. The Planning Statement (November 2018) also suggests this proposal would

result in economic growth and further employment 'downstream' due to the links with the supply chains. Given Wasdell is an existing employer within Swindon, support is gained from Policy EC1 of the Local Plan that seeks to enable the expansion of local businesses. However, this support is qualified by Policy EC1 promoting central and accessible locations, and within the explanatory text for this policy that states, at paragraph 4.60, "*Intensification or expansion of existing employment sites will be supported to allow business to expand and encourage development in accessible locations subject to other policies in this Plan*". Therefore, the support from Policy EC1 must be considered alongside other relevant Local Plan policies, which is addressed in this report.

- 9.48 The retention of the local business is a material consideration in favour of Phase 1, however, as planning permissions relate to land, any business would be able to implement the scheme and operate from the site. It would not be specific to Wasdell.
- 9.49 The application outlines the intention for Wasdell to also occupy another unit within Phase 2 of the proposed development, and therefore this element would facilitate the growth of an existing business and as such there is some policy support from Policy EC2. The proposed Science Park elements of the scheme which form the remainder of Phase 2, derive no support from Policy EC1 insofar as it relates to retaining local businesses.

Science Park

- 9.50 Chapter 4 of the ES (April 2020) states that the primary science park element of the proposal would be brought through Phase 2 of the proposed scheme, which incorporates Class B1b (research and development). As noted above, it is anticipated that Wasdell would also occupy the Class B1c element of this phase. Phase 2 is the outline element of the submitted application.
- 9.51 The applicant's Employment Land Report (November 2018) refers "*to cluster similar uses and businesses together and to enable and stimulate further economic growth*" (para 15.6, p28). In addition, the Planning Statement refers to "*related companies and businesses within the supply chain will be encouraged to co-locate within the science park. Swindon will also be equipped with a high-quality campus style Science Park, which allows it to compete with locations such as Oxford and Reading that have in (recent years) been more successful in attracting international investment*" (Para 1.6, p3). The concept of the Science Park draws some support from the LEP's Strategic Economic Plan, and the creation of new training opportunities and apprenticeships would bring some benefits.
- 9.52 The Planning Policy Officer (March 2019) raises a number concerns with the submitted analysis including the speculative nature of the proposed development, and that no objectively based rational had been provided in relation to the

proposed size and location. They also suggested some further analysis of the following:

- evidence base demand for such a facility in Swindon,
- prospective occupiers,
- competition or synergies with nearby science parks,
- likely skills matrices (vis-à-vis local workforce profiles),
- ownership and management,
- optimum floorspace and land-take, and
- environmental, economic and social factors of successful science parks.

- 9.53 As part of the revised submission, the applicants submitted a report by CAM-SCI (dated August 2019). The key question for Officers is therefore whether the submitted additional information assists the decision maker in assessing the science park proposal in the planning balance. Despite this report, Officers have significant concerns with the science park element of the application.
- 9.54 The CAM-SCI report refers to the ‘hub and spoke’ development model which seeks to co-locate SMEs with larger corporations within their sector. The benefits of this approach range from on-site expertise and market connectivity through to reputational and locational benefits. The report then states that whilst the ‘hub and spoke’ development model is not often practical for start-up science parks, there is an opportunity to launch a significant anchor occupier, with Wasdell as the anchor or hub, which would make this development a viable approach. CAM-SCI explain the target markets for the SSP will include convergent technologies across all innovation-led sectors with a particular focus on fastest growing markets such as digital, pharma and life sciences. Whilst it outlines sources of demand such as latent demand in the region; companies seeking co-location of specialist infrastructure; and investors seeking an optimal location, the report does not quantify any of these sources of demand.
- 9.55 The CAM-SCI Report also describes and evaluates the differing forms of science park models, including Supply-Led Development Model, Pre-Let Development Model, and the aforementioned Hub and Spoke development mode. In respect of the Hub and Spoke model CAM-SCI describe it as *“usually a combination of a substantial pre-letting to the anchor occupier and speculative development to stimulate demand from the wider innovation sector”* (page 35). The report then goes on to say; *“This is a low risk approach to science park development as the speculative provision of the innovation ‘spokes’ is largely countered by the pre-letting”* (page 36). Even if it were accepted that the Hub and Spoke model was the low risk model, Officers consider it not to be without considerable risk, and the proposed Science Park element of this proposal would ultimately form a speculative build.
- 9.56 Whilst CAM-SCI set out the qualities of Wasdell Packaging in its innovative products and service delivery and economic value, what is lacking is any clear

explanation of how it will act as the hub to the Science Park. CAM-SCI explain on page 46:

“Wasdell will require the specialist infrastructure support provided by science parks together with the ability to grow on-site at the point of need. Due to the specialist nature of its work, Wasdell would also like the opportunity to locate and grow in a location where there is the potential for like-minded companies and a range of collocating SMEs working in similar and complementary fields.”

9.57 The CAM-SCI Report then states on page 46:

“Wasdell has selected SSP largely because of the logistical advantages of the location, the ability to retain staff, the ability to recruit new staff in the region and the existence of an established supply network regionally.”

9.58 Both of these statements are vague, and fail to specifically endorse Wasdell as a suitable anchor tenant. There is no clear evidence that Wasdell need the SSP, nor the SSP has any firm basis with Wasdell as the anchor occupier.

9.59 In order to retain the integrity of the SSP vision, and to build a unique cluster of like-minded companies over time, CAM-SCI recommend that a user restriction is drafted to reflect the vision and aims of the development. Officers agree with this recommendation. The CAM-SCI Report adds that a user clause that is too restrictive would not necessarily stimulate market demand.

9.60 The inherent risk is that either piecemeal or comprehensively the SSP vision is not realised and the Council comes under pressure to grant alternative employment uses such as logistics or alternative uses such as housing to deliver other elements of the scheme. This is in the context of paragraph 120 of the NPPF, albeit referring to allocated sites.

9.61 Overall, Officers consider that there is insufficient evidence and a lack of justification to demonstrate the demand for a Science Park facility in Swindon. In particular, there is no indication of prospective occupiers through soft marketing or otherwise, no engagement with academic or business trade organisations, and no clear business plan to deliver. The lack of this information raises concerns that elements of the proposed development are purely speculative.

Economic Impact

9.62 Chapter 6 of the ES assess the likely socio-economic effects of the proposed development, job creation and economic productivity. The CAM-SCI report refers to Wasdell's economic impact, with the key information taken from the report by Turley Economics. This report suggests that if Wasdell is able to secure the expansion at SSP, Phase 2 in total will support a further 1,400 FTE jobs in

Swindon. It is not clear from the application submission as to the occupational skill level of jobs proposed, nor could this be guaranteed.

- 9.63 The proposed development makes a commitment to an innovation centre as part of the Phase 2 element of the planning application. The CAM-SCI Report suggests this will be linked to Wasdell's research and development activity and will act as a focal point to attract entrepreneurs and new-innovation-led companies. It states that 80 direct jobs and 148 jobs would be anticipated as part of each phase of 10,000 sq ft of development. It is unclear how these job projections relate to the 32,281 sqm (GIA) of Use Class B1b (research and development) in the application description and the illustrative layout. However, on a simple conversion and grossing exercise, applying CAM-SCI indicative jobs would equate to 2,780 direct jobs and nearly twice that in indirect jobs. It is not clear how these projections relate to the Economic Benefits Table (p51, Planning Statement – November 2018), which suggests the Phase 2 element of the proposed development would provide 880 direct jobs in Swindon. The proposed jobs would be a material consideration in the proposals favour, within the context of the delivery risks outlined above.

Alternative Sites

- 9.64 Paragraph 82 of the NPPF refers to the need to recognise locational requirements for different sectors, which *"includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations"*. Notwithstanding the concerns raised above relating to the demand and deliverability of the science park element of the scheme, the potential for a cluster of businesses is a material consideration in the schemes favour.
- 9.65 The submitted Planning Statement (November 2018) and Land Availability Reports (Alder King 2018 and Webb Paton 2020) suggest there is a lack of available employment sites located within the Borough, which forms part of the reason for the proposed development at this site.
- 9.66 The Swindon Borough Employment Land Review (NLP, 2017) (ELR) identifies that in quantitative terms there is sufficient employment land allocated to meet economic growth projection-based scenarios. Qualitatively, the ELR reports feedback from local property agents about the difficulty in fulfilling industrial requirements. The challenges include barriers to the immediate delivery of some sites, and that much of the recent employment land has been developed for logistics and distribution, which leads the evidence in the report to support additional industrial land within the Borough. Whilst this lends some support to the needs of Wasdell, the ELR does not necessarily support employment development in this location. The Council is currently in the process of a Local Plan review which provides the opportunity for employment land to be identified.

- 9.67 The initially submitted Land Availability Report (AK 2018) outlines the broad site search requirements. The submitted Land Availability Report (WP 2020) raises some more specific / additional search requirements than the original report. These include:
- a) Within a 15 minute drive time of Swindon town centre.
 - b) Within a 15 minute drive time of Junction 15 of the M4.
 - c) A minimum site size of 35 hectares.
 - d) Must be available so as to allow development to commence in 2021.
 - e) Must be owned by or under the control of one landowner.
- 9.68 The Wasdell Properties Site Search Requirements document (WP 2020, Appendix A), elaborates on the criteria identified above. Officers have concerns with the justification for a number of these requirements. Whilst Officers note the accessibility requirements of a) and b), it is not clear why 15 minutes has been selected. Moreover, the application site at Inlands Farm is not currently well connected to the railway station by public transport and is relying on an employee shuttle bus, which would only operate aligned with the shift patterns, during its initial phases.
- 9.69 With respect to c), this site area is based on the entire Science Park, much of which is speculative and would not be needed to allow Wasdell to relocate and expand. Officers therefore consider that an alternative smaller site would allow Wasdell to match their ambitions. There is also no consideration as to whether the proposed scheme could be delivered on a smaller site through an alternative design. For instance, if the application site was located in an urban location, there would be potential opportunities for the required level of floorspace to be delivered at a higher density, whilst there may be different requirements in terms of car parking and mitigation planting.
- 9.70 Criterion d) refers to the timescales for the development to commence. Thames Water has raised some concerns with the capacity of the existing water supply and waste networks, and it is unclear what the timescales involved to satisfy this issue are, however it may require substantial infrastructure upgrades which could take time. This raises the question as to whether the proposed development could in fact be delivered at the application site within the suggested timescales (by 2021 for Phase 1), and whether other sites dismissed by the Land Availability Reports because of the timeframes involved, would actually represent a more viable site for the proposed development in terms of timeframes.
- 9.71 Several large sites are rejected because they are (d) 'too far in the future' or (e) not in single ownership. These are commercial requirements and should not override sustainable planning considerations. In particular several sites around Junction 16 of the M4, including the allocated employment site at Wichelstowe are rejected for this reason.

- 9.72 A total of 65 sites were assessed against these criteria. Only 3 sites were judged to meet the user defined criteria, with a majority judged to be too small. There is no consideration of disaggregation or amalgamation of adjacent sites. Further to this, the assessment for Inlands Farm is not consistent with that for other sites, and lists a host of benefits, which are not applied to other sites, or are somewhat tenuous. The submitted Land Availability Report (WP 2020) has attempted to replicate the methodology applied in the Sustainability Appraisal to the Local Plan Review, but with different results. The Inlands Farm site assessment does not score poorly on any criteria, and suggests there will be no obvious landscape impact, which is at odds with the sites location within the setting of the AONB. Officers do not consider the sustainable advantages to be as clear as presented within the Land Availability Report (WP 2020). Overall Officers have significant concerns with the robustness of the submitted Land Availability Assessments.
- 9.73 Honda UK have announced their intention to close the manufacturing plant at South Marston in 2021. The Council have reiterated the importance of retaining the site for employment use (South Marston Airfield (Honda) Planning Policy Position Statement, Planning Committee August 13th 2019), and the site is confirmed as a Key Employment area in the Local Plan Review. This is potentially an alternative site for the proposal. Officers have concerns particularly in respect of the SSP, that it presents an alternative employment land offer on an unallocated and less sustainable location than the Honda site.

Personal Planning Permission

- 9.74 The covering letter (24th April 2020) makes it clear that a personal permission is not sought for Wasdell or any other employer. The applicant has stated that this is based on legal advice which suggests due to the proposal being for a company and for permanent buildings, a personal permission is unlikely to be appropriate. Given the size and scale of the proposed development, in particular the building proposed under Phase 1, and the breadth and scope of the consent sought, Officers have concerns that the proposed development could turn into a more generic business park or industrial estate, particularly given the lack of evidence relating to other tenants being secured for the wider Science Park. In the absence of this, there are concerns that the proposed scheme could lack a clear scientific focus or governance which is necessary to mitigate against any future divergence from the Science Park to a general industrial estate. This is considered as part of the material considerations of the proposed development.

Other considerations

- 9.75 Within the submitted material the applicant has referred to the success of other Science Parks such as Stevenage BioScience Catalyst. Likewise, comments received from consultees have raised issues with other Science Parks such as Porton Down in Wiltshire which they claim has required significant public investment and not yielded large numbers of jobs. Officers note the potential benefits and risks raised with the establishment of other Science Parks, although

without the submission of detailed information on these matters, cannot comment on specific examples.

- 9.76 Some comments have expressed concerns that land with a Class B1c use consent could be converted to residential under permitted development rights. The current use class order does allow for this, subject to a number of criteria.
- 9.77 The submitted Economic Impact Statement (November 2018) identifies key economic benefits including the anticipated number of jobs generated by the proposed development. Whilst Officers have no reason to dispute these figures, a number of submitted comments suggest combining separate sites together could create additional efficiencies both operationally and logistically, which could result in fewer jobs being required than anticipated within the submitted evidence. It is not clear whether the applicant has considered this within the submitted information.
- 9.78 Some comments submitted have suggested that the Land Availability Report (WP 2020) was undertaken by the land agent for the site and that this represents a conflict of interests. Officers do not have any evidence to form a judgement on this.
- 9.79 Comments have been received from local residents and business owners suggesting the proposed development would result in some businesses in the equestrian, hospitality and leisure sectors being forced to closed, resulting a loss of jobs in the local area. Whilst it is clear to Officers that the proposed development would alter the existing rural character of the application site and surrounding area, and that there would be increased activity in terms of vehicle movements and noise, without additional evidence, it is difficult to substantiate the specific impacts to businesses in the surrounding area.
- 9.80 A number of letters were received from Wasdell employees supporting the proposed application on the grounds that it will allow the company to expand and secure jobs in Swindon. Whilst these identify a will from current employees to support the development, the planning application is for open Class B1b and Class B1c uses, and therefore there is no guarantee Wasdell would occupy the proposed development, or if they did, for how long.

Summary of Principle of Development

- 9.81 The application proposes an industrial use outside of the Swindon urban area and within the countryside, compromising the development strategy outlined within Policy SD2. The scale of the proposed development in this location would therefore constitute a major departure from the development plan. It is therefore necessary to consider whether material considerations would outweigh that conflict in the planning balance.
- 9.82 As outlined earlier within this report, the expansion and retention of local

businesses within Swindon is supported by Policy EC1 of the Local Plan. However, the policy is clear that this is supported “*in accessible locations subject to other policies in this plan*” (paragraph 4.60, Local Plan). Furthermore the Local Plan states at paragraph 4.62 “*To provide for future investment and business expansion, additional employment allocations are made at Commonhead, Wichelstowe, Tadpole Farm and the New Eastern Villages as detailed in Policy SD2*”. If planning permission were to be granted, there is no guarantee that the site would be occupied by Wasdell Group, nor for how long.

- 9.83 If the entire Science Park proposals were fully realised there would be benefits in terms of inward investment and economic growth which gains weight from the NPPF. There would be other economic and social benefits through the provision of indirect jobs, wider investment, training and skills opportunities and associated local expenditure from persons in employment. There would also be short term benefits through the construction phases. However, given the significant concerns in relation to the review of alternative sites and demand for the SSP, along with the speculative nature of the proposals, Officers have significant concerns about its sustainable delivery.
- 9.84 The benefits of the retention and expansion of a local business would need to be weighed against potential negative landscape impacts, including on the AONB, heritage assets and on the principle of non-coalescence which is important to the planning of the New Eastern Villages, with particular regard to those aspects where the NPPF directs the decision maker to refusal.

Historic Environment

- 9.85 With regard to listed buildings, Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (‘PLBCA’) requires the decision maker to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Where a development proposal affects a conservation area, section 72 of the PLBCA requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas.
- 9.86 Policy EN10 of the Local Plan seeks that proposals conserve and enhance the heritage significance of Swindon’s heritage assets, and reflects the statutory duties of the PLBCA. Archaeological sites should be preserved in a manner appropriate to their significance.
- 9.87 The NPPF states that the historic environment contributes to the role of sustainable development by contributing to protecting and enhancing our natural, built and historic environment. Further to this Chapter 16 of the NPPF, states that local policy should provide “*Heritage assets range from sites and buildings of local historic value to those of the highest significance...*” and that “*These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their*

significance...".

- 9.88 NPPF Paragraph 189 states that *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance".*
- 9.89 Paragraph 193 of the NPPF 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 (and the more important the asset, the greater the weight should be)".*
- 9.90 Further to this, Paragraph 194 of the NPPF states *"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification".* Significance is defined in the NPPF as *"the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."*
- 9.91 The PPG advises that *"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals" (Paragraph: 007 Reference ID: 18a-007-20190723 Revision date: 23 07 2019).*
- 9.92 With regard to setting the PPG advises that *"the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each" (Paragraph: 013 Reference ID: 18a-013-20190723 Revision date: 23 07 2019).* This is also outlined within the 'Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' (December 2017).
- 9.93 Paragraph 197 of the NPPF refers to the effect of a proposed development on the significance of non-designated heritage assets.

- 9.94 As can be seen from the comments of Historic England and the Council's Conservation Officer, concerns were initially raised by both consultees on whether the approach and assessment of the impact of the proposed development on the heritage assets was sufficient to understand the impact and any associated harm caused of the proposal on the significance of any heritage assets and their setting, in accordance with the NPPF (Para 189). These concerns related to how a number of the listed buildings had been assessed as clusters, rather than assessed individually; the methodology behind assessing the Site of the Roman Town, Scheduled Monument; and the discrepancies between landscape and heritage assessments of the Liddington Castle Scheduled Monument (LCSM). The applicant submitted letters on 7th March 2019 to respond to the consultee comments on both the Archaeology and Built Heritage Chapters of the ES and provided clarification on the concerns raised. The Amended Submission (April 2020) provides revised ES Chapters and includes an amended Built Heritage Statement (March 2020) and Parameter Plan Composite (Drawing No. 115, P9 - July 2018) which illustrates development zones, indicative building footprints and maximum building heights.
- 9.95 It is evident from the consultation responses received that there are some differences of professional opinion about the methodologies used in making the assessments. However, in line with paragraph 189 of the NPPF, the level of detail the applicant has now submitted has described the significance of the asset to a degree that when combined with the opinions of Officers and external stakeholders, is considered by Officers, on balance, to be sufficient to understand the potential impact of the proposal on their significance and enable a sufficient determination to be made.
- 9.96 The submitted ES and associated reports have on balance provided the necessary understanding, so it is now possible to make the assessment as to the degree of harm to the significance of the heritage assets as a whole and establish whether paragraphs 195, 196 and 197 of the NPPF would apply.

Built Heritage

- 9.97 As detailed within the ES, there are a number of heritage assets within the vicinity of the application site. These include the Conservation Areas of Upper Wanborough (UWCA), approximately 50m to the east of the application site, and Lower Wanborough (LWCA) and Liddington (LCA). There are a number of listed buildings located within the UWCA including the Grade I listed St Andrews Church. A number of other listed buildings are also located within the LWCA, on The Marsh to the north of the application site and within the LCA including the Grade I listed Church of All Saints. Officers consider that as a result of the inherent relationship between these buildings and sites, to the open countryside, the proposed development has the ability to affect the setting of these designated heritage assets.

- 9.98 Chapter 8 of the ES and the associated Built Heritage Statement (Appendix 10.1) ('BHS') assesses the impact of the proposed development on the significance of the heritage assets within the study area of 2km. Chapter 8 of the ES concludes that in the applicants opinion, in the long term (operational phase) there would be a 'minor adverse' impact to the St Andrew's Church, 'minor adverse' impact to Disney Cottage and The White House and 'minor adverse' impact to the UWCA. It considers that there would be a 'neutral effect' on the other heritage assets.

Upper Wanborough

- 9.99 The Upper Wanborough Conservation Area (UWCA) is immediately to the east of the application site and encompasses the historic core of the village. The UWCA appraisal highlights that the special interest of the conservation area is derived from a number of elements, such as:
- *The historic street pattern and layout of the village on either side of Church Road including the roads leading in and out of the village;*
 - *The rural setting of the village on a promontory above the Upper Thames valley with significant views of both Liddington Castle to the south and the low-lying plain to the north*
 - *The architectural and historic interest of the village's buildings and other structures - in particular St Andrew's Church (grade I);*
 - *The prevalent use of local materials, notably thatch and local stone; (Greenstone and chalkstone); and*
 - *The area's trees, especially individual yews, and other greenery where this bounds a road or footpath.*
- 9.100 In the applicants opinion, the BHS states that Wanborough now forms more of a satellite or suburb to Swindon (Para 2.10, p.10), and that new built form has altered the appearance of the village (Para 4.48, p. 37). The ES and BHS conclude by stating that the proposed mitigation would lessen the urbanising effects, and as a result the level of harm to the UWCA is considered to be minor adverse effect. Following a review of the Amended Submission, Historic England and the Conservation Officer both disagree with this conclusion, and consider the harm caused to the significance of the UWCA to be greater than outlined within the ES and BHS.
- 9.101 Officers consider that Upper Wanborough forms a distinct, rural village separated from Swindon, and therefore disagree with the assertion that Wanborough forms a suburb to the urban area of Swindon. A key contributor to the significance of the UWCA is the rural, hilltop setting, which can be experienced from approach roads to Upper Wanborough such as Pack Hill, where there is a sense of openness, with tree planting primarily on field boundaries or in small clusters. Views to the north and The Downs to the south are visible over the lower sections of hedgerow, and there are glimpses of the buildings within Upper Wanborough including the Church Tower and Spire. These experiences are heightened as the land starts to rise towards the village.

- 9.102 The BHS states “*much of the traditional (enclosed) field pattern has been replaced by larger open fields of arable or improved pasture as more intensive modern farming practices have been introduced.*” (Para 2.2, p. 5). Whilst it is evident that some of the historic field boundaries have been removed, Officers consider that a majority of those in the surrounding setting have been retained, so are considered to contribute to the experience of the wider local character and distinctiveness of Upper Wanborough. The surrounding land, including the application site was historically used for agricultural purposes, and this agrarian and pastoral landscape is still in situ today, which is considered to assist with the appreciation of the setting of the UWCA, where openness, rural experience, dark skies, tranquillity and isolation are strong characteristics. Historic buildings and their grounds within and to the periphery of the UWCA, many of which are designated and non-designated heritage assets display an inherently agricultural form and function which assists in explaining their historic origins, relationships and functions.
- 9.103 The green and open character of the application site is therefore considered an important and positive contribution to the significance of the UWCA, and its designated and non-designated heritage assets and is fundamental to its rural character and separation from the Swindon Urban Area. The proposed development would involve considerable built form on land within the setting of the UWCA, and its designated and non-designated heritage assets, resulting in a significant urbanising effect, and give a discordant intrusion to the rural area. Development on this nature, scale and bulk would result in a transformational change to the character of the area, adversely affecting the isolation and tranquillity of the rural experience. Together, this in turn detrimentally affects the significance of the UWCA, including its designated and non-designated heritage assets through development within their setting.
- 9.104 The hilltop setting of the UWCA is such that it can be viewed and experienced from much of the surrounding area. Vehicles travelling along approach roads to the conservation area, such as along The Marsh, can glimpse the village and its setting through or over hedgerows, whilst there is an extensive network of Public Rights of Way (PRoW), which connect Upper Wanborough, Lower Wanborough, The Marsh and Pack Hill, as well as Liddington and Swindon, some of which cross the application site. The PRoW primarily crosses open fields and has an inherently rural feeling and experience. Pedestrians utilising the PRoW benefit from views to Upper Wanborough, Liddington Castle and The Downs which assists in informing the historic association, experience and relationship between the sites. It is evident from the representations received that these form an important resource for local residents. Whilst the PRoW would be retained as part of the proposed development, the experience would be significantly altered; from open grass fields with informal tracks to hard, engineered tracks and surfaces where users would be surrounded by large industrial buildings and associated infrastructure such as lighting, security fences, large areas of tarmac for car

parking and areas of hard standing. The significant amount of hardstanding and buildings is illustrated within the Landscape Strategy (p. 41, Feb 2020). The proposed development would introduce noise and light intrusion to the characteristic dark skies which currently have little illumination, with permission being sought for operations to run 24 hours a day. The A419 can be heard in the background from certain points across the site, however it is not considered to significantly lessen the feeling of tranquillity and isolation from being in a rural location. The urbanising effect, scale across the entire site and increased activity of the proposed development would interrupt the experience of the rural context to a detrimental level. This would diminish the ability to experience the local qualities which are important to the local character and distinctiveness of the hill top setting of Upper Wanborough from large parts of the surrounding area.

- 9.105 The Upper Wanborough Conservation Area Appraisal and Management Plan (UWCAAMP) (May 2006) states “*Views from within the conservation area to the wider landscape testify to the area's setting in the landscape and thereby make a significant contribution to its overall rural character*” (p.6, UWCAAMP). The application site has a strong rural character, and forms a significant component to the setting of the UWCA. The BHS states that the proposed development will not be visible from all areas within the UWCA. Officers note that whilst there are intervening buildings between some views from within the UWCA to the wider rural landscape, there is an absence of built form through the gaps in the buildings, further highlighting its rural location. The introduction of substantial built form greater in scale, visual massing and proportion than anything surrounding would result in a dominance of the proposed development and a resultant loss of openness, and would compromise views from the UWCA outwards towards the open countryside, diminishing its significance and contribution to the significance of the conservation area.
- 9.106 St Andrews Church, is a Grade I listed church located in Upper Wanborough. Its significance is primarily derived from its age, construction, historic association with the village and aesthetic qualities within the rural landscape, as one of only three churches in the country to have both a spire and a tower. As identified earlier within this section of the report, St Andrews Church is located centrally within Upper Wanborough, with the tower and spire highly visible from the application site and surrounding area. It is this visual prominence which is considered particularly important in heritage terms, and the open fields beyond which includes the application site which is considered to form a positive contribution to the setting of this heritage asset.
- 9.107 The submitted ES does not disagree that the subject site forms part of the setting of the St Andrew's Church and concludes that “*the Proposed Development would result in some limited degree of harm due to the urbanising effects within the wider setting of the listed building*”. As outlined above, the scale, bulk, massing and siting of the proposed development would significantly transform the open, rural character of the area, erode the historic landscape setting of St Andrews Church

and diminish the ability to appreciate the role and influence of the church within the UWCA.

- 9.108 Lynch House, Disney Cottage and White House are all Grade II listed buildings located within the UWCA and were formerly constructed as buildings associated with the agricultural operations of the surrounding land. They primarily gain their significance from their architectural and historic interest, whilst the wider countryside setting and UWCA make positive contributions to their understanding and appreciation of their former form and function and hence, their significance. The proposed development would result in a detrimental intrusion to their wider setting, and whilst there is some intervening vegetation, this would attempt to hide the development, rather than reinforce the openness, relationship with the surrounding open land, and the wider views and resultant experience which is an inherent component of their significance. The setting of both Disney Cottage and White House, would also experience a loss to the traditional relationship of these listed buildings with their origins and the surrounding agricultural farmland which is an essential contributor to their setting, and hence significance.
- 9.109 Considering both forms of development, the scale and appearance of the proposed development would be jarring and discordant within this open countryside location, and Officers disagree with the assertion of the BHS which states that the proposed scheme would be seen in conjunction with Swindon (Paragraphs 5.22 and 5.28). The location of proposed development would be on existing green agricultural land, to the east of the A419, significantly closer to Upper Wanborough.
- 9.110 In summary, Officers consider the proposed scheme would fail to preserve the architectural and historic interest of the above specified listed buildings; and would fail to preserve or enhance the character and appearance of the UWCA, as required by Sections 66 and 72 of the PLBCA. The proposed development would cause 'less than substantial' harm to the significance of the UWCA and listed buildings within Upper Wanborough through development within their setting. Particularly in the case of UWCA, this is considered to be a more significant level of 'less than substantial' harm than concluded within the submitted ES and BHS.

Other Heritage Assets including Lower Wanborough, Liddington and The Marsh

- 9.111 The Lower Wanborough Conservation Area Appraisal and Management Plan (LWCAAMP) (February 2009) states *"To the south, the scarp provides Lower Wanborough with a green backdrop. In views southwards from within the village, especially from the High Street, trees and hedges on the chalk escarpment above and beyond the rooftops add to its rural character, emphasising its distinctive location at the foot of chalk downlands"* (p.12, LWCAAMP). The LWCA also contains a number of listed buildings including those on High Street and Rotten Row. There are some changes in topography and intervening fields, trees and buildings between the application site and these heritage assets, however the application site contributes to the wider rural character of these heritage assets,

their historic associations, relationships and how they are experienced. Similarly to the UWCA, the size, scale and nature of the proposed development, with associated paraphernalia, lighting and noise pollutions would impact the rural character and significance of the LWCA and listed buildings within, through development within their setting.

- 9.112 The Liddington Conservation Area Appraisal and Management Plan (April 2006) refers to the setting of the village within the North Wessex Downs AONB, and views to the Liddington Castle hill fort and Upper Wanborough. The LCA contains a number of listed buildings including the Grade I listed Church of All Saints. Whilst there is intervening topography and vegetation, the wider rural character is considered to contribute to how the LCA and associated listed buildings are experienced. Development within the setting of these heritage assets, particularly through increased noise and activity, would affect the significance of these heritage assets.
- 9.113 There are a number of heritage assets including listed buildings and non-designated heritage assets, located in close proximity to The Marsh, such as Moat Cottage, Lake Cottage and Wrightsbridge House, Farmhouse and Coachhouse (all Grade II listed buildings). The open countryside is considered to make a positive contribution to the understanding and appreciation of the significance of these heritage assets and strongly contributes to their experience within the rural countryside setting. For similar reasoning as detailed above, by virtue of the scale, siting and increased activity and noise, the proposed development would have an uncharacteristic urbanising effect on the existing countryside, adversely affecting significance of the designated heritage assets from development within their setting.
- 9.114 In summary, Officers consider the proposed scheme would fail to preserve the architectural and historic interest of the above specified listed buildings; and would fail to preserve or enhance the character and appearance of the LWCA, LCA and associated heritage assets, as required by Sections 66 and 72 of the PLBCA. It is considered that the harm caused would be 'less than substantial'. In the case of the LWCA and the listed buildings along The Marsh, including Moat Cottage, Lake Cottage and Wrightsbridge House, Farmhouse and Coachhouse (all Grade II listed buildings), it would be to a lesser degree than as judged to the UWCA, because the intervening trees, vegetation and topography effect how these assets are experienced. The harm to the LCA would be on the lower end of 'less than substantial' due to the increased distance to the application site and level of intervening topography and vegetation, and as such the urbanising impact of the proposed development is likely to be experienced to a lesser degree.

Scheduled Monuments

- 9.115 The Local Plan Policies Map identifies Scheduled Monuments, including Site of Roman Town (SRTSM) (also referred to as Durocornovium) about 1.2km to the

north of the application site, which was scoped out of the submitted ES and Liddington Castle Scheduled Monument (LCSM) approximately 3km to the south.

- 9.116 The submitted BHS states that Liddington Castle Scheduled Monument (LCSM) is located on top of a natural summit with commanding views across the surrounding landscape, and that this rural setting and long ranging views contributes positively to its significance. It refers to the evidence of development on Swindon's eastern edge and suggests the noise from the M4 introduces a sense of activity. It concludes by stating that whilst the proposed development would result in a change, this would not equate to harm, and the significance of the heritage asset would be sustained.
- 9.117 Views from the LCSM are extensive and include the wider landscape and application site, which are considered to form part of its setting. The LCSM and surrounding landscape are also clearly visible and appreciated from the application site, surrounding roads and PRow which contribute strongly to its setting. The application site is located within the non-coalescence area (Policy NC3), which seeks to retain a separation between Wanborough and the Swindon Urban Area and NEV Strategic Allocation. Whilst Policy NC3 is primarily associated with the separation of villages, there is also the obvious connection with the historic environment in that this separation makes a strong contribution to the historic association and experiences of the villages and surrounding monuments. Whilst it is appreciated that coalescence is predominantly related to the physical planning of villages, there is overlap into the historic environment and part of the reasoning for this non-coalescence is to preserve the open and rural aspect of the historic environment.
- 9.118 The scale and siting of the proposed development would significantly extend the visible area of built form out into the countryside, closing the visible green area between Swindon and Upper Wanborough, diminishing the rural character when viewed from the LCSM. The scale and siting of the proposed industrial units, fences, lighting, noise from industrial activity and movements, and landscaping would result in the loss of a number of vantage points where the LCSM can be appreciated, particularly for users of the PRow. The significance of the LCSM is therefore considered to be harmed, through development within its setting.

Archaeology

- 9.119 Wanborough and the surrounding area has known or potential archaeological interest, and approximately 200m to the south-west and 600m to the north-east of the application site are areas of Significant Unscheduled Archaeological Features.
- 9.120 The initial application submission included a Heritage Impact Assessment (November 2018) which was based on a desk-based assessment and recommended that a planning condition require a Written Scheme of

Investigation. Given the potential for archaeology in the area, the Council's Archaeological Adviser requested an Archaeological Evaluation adopting a 4% trench sample be undertaken prior to the determination of the application. An Archaeological Evaluation (November 2019) was submitted as part of the Amended Submission (April 2020), alongside Chapter 9 of the ES.

- 9.121 The Archaeological Advisor has no objections in principle to the submitted Archaeological Evaluation, however an area to the west of the application shows remains which form part of a roman settlement. The Archaeological Advisor has requested that this area of archaeological interest, along with a 20m buffer are preserved in situ in pasture and not subject to any ground disturbance. The application submission, including the Phase 2 Indicative Site Plan (P10), Parameter Plan Composite (P9) and Illustrative Landscape Masterplan (Rev D) indicate development in this location. Officers therefore consider that there is insufficient information submitted to demonstrate that the proposed development and quantum of floorspace applied for, can be delivered whilst ensuring that the area of archaeological interest remains preserved in situ. It would therefore fail to accord with Policy EN10 of the Local Plan which seeks to ensure the historic environment within the Borough is sustained, enhanced and appropriately preserved.

Summary Heritage

- 9.122 In accordance with the requirements of the PLBCA, the NPPF and the Local Plan, the heritage assets have been assessed in terms of their significance and the contribution of the site to their setting. The application site forms part of an agricultural and rural landscape between Wanborough and Swindon, and contributes significantly to the setting of Conservation Areas, as well as to the setting of other designated heritage assets. In particular, this significance is experienced on the approach roads such as Wanborough Road, Pack Hill, The Marsh and the A419 and from Public Rights of Way which connect the villages. The proposed development, by way of scale, siting and increased activity and noise would result in a significant urbanisation to the existing character, and would detract from the significance of the heritage assets from development within their setting.
- 9.123 It has been concluded that harm has been found to a number of heritage assets including the nearby listed buildings, LWCA and LCSM, through development within their setting. This harm would be towards the lower end of 'less than substantial'. Further to this, the proposed development would result in harm to the significance of the UWCA and listed buildings within, through development within their setting. This harm is nevertheless considered to be significant and would be towards the upper end of 'less than substantial'.
- 9.124 NPPF Paragraph 196 deals with 'less than substantial harm', and states "*Where a development proposal will lead to less than substantial harm to the significance of*

a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.

- 9.125 The less than substantial harm caused to the significance of the heritage assets from development within their setting must therefore be given great weight and importance (paragraph 193, NPPF). This is further discussed in the ‘Concluding Comments and Planning Balance’ Section.
- 9.126 Overall, Officers have paid special attention to the desirability of preserving the setting of the listed buildings in accordance with the Act and relevant national and local policy. The proposed development fails to conserve or enhance the significance of the existing heritage assets, contrary to S66 and S72 of the PLBCA, Policies EN5 and EN10 of the Local Plan and the provisions of the NPPF.

Design, Layout and Canal Alignment

- 9.127 Policy DE1 of the Local Plan requires a high standard of design and includes a number of design principles that the development should meet. The proposal will be assessed in terms of the site’s context and character, the layout, form and function and amenity. In particular the proposal should be permeable, provide connectivity and be of appropriate scale, orientation, and massing. Further to this, Policy DE1 requires development to be of a high quality of design to address the objectives of sustainable development.
- 9.128 An underlying theme within the NPPF is the creation of healthy and inclusive communities. It states that *“good design is a key aspect of sustainable development”* (para 124).
- 9.129 *NPPF Para 127. Planning policies and decisions should ensure that developments:*
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) create places that are safe, inclusive and accessible and which promote*

health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

- 9.130 *NPPF Para 130. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.*
- 9.131 *NPPF Para 131. In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.*
- 9.132 As outlined earlier within this report, the application is hybrid, consisting of full details for Phase 1, with details for Phase 2 reserved for submission at a later stage. The initial submission for Phase 1 proposed elevations clad in a mixture of different greens, with a number of projecting ivy clad walls. The amended application includes changes to the roof form to include solar panels and a green roof, whilst the elevations include recesses and a different colour palette. The principal elevation (west facing) would largely be constructed from polycarbonate cladding. The Phase 1 element of the application includes a large industrial building, measuring approximately 165m (north to south) and 175m (east to west), with a total height of 14.5m. The submitted Parameter Plans (P9) indicate the likely scale and nature of development within Phase 2.
- 9.133 As outlined earlier within this report, the application site is located within the countryside, outside of the Swindon and Wanborough settlement boundaries and with the area of non-coalescence which seeks to protect the character and identity of Wanborough, Bishopstone and Bourton (Local Plan Policy NC3). The boundary and scale of the NEV strategic allocation, along with the proposed strategic landscaping requirements were established through detailed masterplanning work to ensure a graduated transition between the new communities and countryside. The scale and nature of the proposed development in this location would fail to integrate with the wider strategic and comprehensive masterplanning of the NEV strategic allocation and would negatively impact Wanborough and its relationship with the surrounding landscape character.
- 9.134 The proposed development would result in a very significant change to the existing rural setting and approach to Upper Wanborough, and contrast harshly with the established pattern of development in the area, which primarily consists of isolated dwellings and village fringe. The siting, scale, bulk and design of the proposed development, in addition to the associated infrastructure and paraphernalia such as gate houses, parking areas, security lighting and fences and smoking shelters, would lead to a significant urbanisation of the site, compromising the existing established context and character of the site and its surroundings, contrary to Policy DE1 of the Local Plan. The proposal would also

be contrary to paragraph 84 of the NPPF which states that the development of employment sites in rural areas should be sensitive to their surroundings.

- 9.135 Policy DE2 of the Local Plan seeks to ensure the design and layout of the proposed development demonstrates passive solar benefits in accordance with Policy DE1 and requires all major non-residential development to achieve BREEAM Excellent. As part of the application submission, a Sustainability Strategy (Jan 2020) ('SS') was submitted which sets out the *"sustainability measures incorporated in the development to deliver a range of economic and social benefits, and protecting and enhancing the environment in accordance with the Council's sustainable development objectives"* (Section 1.1, SS). As part of the initial submission, Energy and Sustainability Statements for both the Phases 1 and 2 (November 2018) were submitted, however updated versions of the document have not been provided as part of the revised submission. These documents outline that an alternative strategy to BREEAM has been developed *"due to a number of site based constraints and barriers to the achievement of a number of BREEAM credit criteria which make the achievement of BREEAM Excellent difficult"* (Section 2.3, SS).
- 9.136 The submitted SS concludes by outlining the broad benefits of the proposed development, which in the applicants view include economic benefits from job creation, sustainable transport measures, mitigation and enhancement measures to minimise the impact on habitats and biodiversity, and reductions in energy and water consumption. A number of the benefits outlined, such as the habitat mitigation or creation of jobs, either form mitigation measures which would be expected as part of any proposal or are not considered within the BREEAM methodology. To avoid duplication, any material benefits deriving from these considerations are therefore considered elsewhere within this report.
- 9.137 The Energy and Sustainability Statements (November 2018) suggest a number of the renewable energy measures and low carbon technologies are not suitable for this particular development. They do however suggest that improvements have been made to the building fabric and lighting efficiency, as well as the provision of PV panels, which will contribute to reducing emissions and improving energy efficiency. Whilst some of the design proposals outlined in the SS are positive, such as the reductions to regulated emissions by 15% and a 25% reduction in operational water consumption, it offers few measurable commitments to demonstrate a significant reduction to emissions or energy use. Once operational, the proposed development is likely to require a substantial amount of energy, as suggested by the significant areas of chilled storage identified on the submitted plans (Wasdell Proposed GF Plan P11). In the context of the scale of the proposed development and the potential implications on the environment, Officers consider that the proposals would offer minimal material benefits in terms of sustainable construction and energy reduction.
- 9.138 Policy DE1 of the Local Plan and the Access for All SPD outline a number of key design principles including the positioning and orientation of buildings, movement

networks, inclusive spaces and entrances and access. Policy DE1 and NPPF Paragraph 127 also require developments to address safety and security within the proposed design to minimise opportunities for criminal damage. Wiltshire Police raised concerns with the proposed scheme particularly in relation to the levels of overlooking and lighting. In accord with the NPPF and Local Plan, further evidence to demonstrate that the principles of accessibility, inclusivity, and safety and security would be required through detailed design, were the scheme being recommended for approval.

- 9.139 Policy SD3 states that detailed design submissions for all significant development proposals should be guided by an overarching design approach that is set out in design codes and/or framework plans. Given the scale of the proposed development, were the application to recommended for approval a condition requiring a design code to be submitted would be required.

Canal Alignment

- 9.140 Policy EN11 of the Local Plan requires developments to safeguard the indicative canal alignment, as identified on the Local Plan Policies Map, by ensuring the integrity of the canal alignment is protected; ensuring that where affected, the alignment is protected or an alternative alignment is provided; and ensuring associated infrastructure of development does not prejudice the delivery of the canal.
- 9.141 The submitted Phase 2 Indicative Site Plan (November 2018) identified a potential canal alignment in the south east of the application site, to the east of the proposed access roundabout, which also forms part of the Sothern Connector Road (SCR). The Wilts and Berks Canal Trust (WBCT) submitted comments on 30th January 2019, objecting to the proposed development, and in particular the alignment proposed by the applicants. Their concerns related to the tight radius and potential visibility of the proposed bends, which would result in the canal needing to be widened. Given the height of the proposed canal at this point, it would involve a substantial amount of excavation.
- 9.142 Since the adoption of the Local Plan, the WBCT have been working on a detailed alignment for the canal. The detailed work on the SCR revealed areas of archaeology which has resulted in alternative alignments being pursued. In addition, other constraints to the south such as the existing planted area and Thames Water pipeline have restricted where the canal can connect to the rest of the network in the future. The submitted comments from the WBCT state that the two preferred options were presented at a public exhibition in May 2019. The overwhelming preference from the feedback was for the Eastern Route (plan included within the WBCT comments) because it avoids the archaeology within Inlands Farm and to the west, allow for the towpath to be further away from the highway which would enhance the experience for its users and would connect satisfactorily with the rest of the proposed canal network to the north and south of the Inlands Farm site.

- 9.143 The submitted Phase 2 Indicative Site Plan identifies a revised route for the canal, which enters the site on the western boundary before passing beneath the proposed roundabout at the entrance to the site and exiting the application site on the southern boundary. The WBCT have raised a number of objections to this proposed alignment. The first is that the alignment proposed as part of the application submission would force the canal route directly towards an area of identified archaeology. The archaeology advisor has requested that as part of this application these roman remains be preserved in-situ. As identified on the WBCT comments (Figure 1), these archaeological remains extend to the west of the application site, and are likely to be of the same significance. This would therefore result in a significant constraint to the delivery of the proposed canal. The second is that the alignment proposed as part of this application presents a number of technical challenges such as land levels required for the proposed canal in relation to the existing road network and the difficulties presented by having small radius bends. These additional challenges would add significant cost or complexity to the canal project or potentially impact its viability. The proposed application fails to demonstrate a suitable, technically deliverable alignment for the canal. The additional infrastructure required to deliver the alignment proposed within this application could therefore prejudice the delivery of the canal, contrary to Policy EN11 of the Local Plan.

Summary

- 9.144 The proposed development by virtue of its location, scale, form and design would not represent high quality design and therefore would be contrary to Local Plan Policy DE1 and the NPPF, particularly the principles of Context and Character and failing to be sympathetic to local character, history, surrounding built environment and landscape setting. The proposed scheme would also prejudice the delivery of the proposed Wilts and Berks Canal, contrary to Policy EN11 of the Local Plan.

Landscape Character and Visual Impact

- 9.145 Policy EN5 of the Local Plan seeks to protect the intrinsic character, diversity and local distinctiveness of landscape within Swindon Borough. Development shall only be permitted where it satisfactorily takes account of landscape character. Further to this, the policy states that proposals that are within or abut the North Wessex Downs Area of Outstanding Natural Beauty ('AONB') must accord with the relevant criteria set out in the North Wessex Downs AONB Management Plan ('NWDMP'), whilst proposals outside of the AONB should not adversely affect its setting.
- 9.146 The NWDMP outlines the long terms goal of the AONB which states "*where a sense of remoteness and tranquillity predominates, and where vast night skies can thrill the eye, unaffected by light pollution; where these special qualities are*

recognised in development decisions within in the setting of the region, so that the natural beauty of the North Wessex Downs AONB is protected” (p11, NWDMP).

- 9.147 The NWDMP also sets out the objectives, policies and key issues facing the AONB including those outlined within Paragraph 5:

5. Examples of adverse impacts on the setting of the North Wessex Downs AONB could include:

- *development which would have a significant visual impact on views in or out of the AONB;*
- *breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and / movement (chimneys, plumes or blades for example);*
- *loss of tranquillity through the introduction or increase of lighting, noise, or traffic movement or other environmental impact like dust, vibration, spatial associations and historic relationships;*
- *introduction of abrupt change of landscape character;*
- *loss of biodiversity, particularly if of habitats or species of importance to the AONB;*
- *loss of features of historic and natural landscape interest, particularly if these are contiguous with the AONB;*
- *change of use of land such that to cause harm to landscape character; and*
- *development individually or cumulatively giving rise to significantly increased traffic flows to and from the AONB, resulting in loss of tranquillity and erosion of the character of rural roads and lanes; • Increase in air and water pollution.*

(Paragraph 5, p23)

- 9.148 The North Wessex Downs AONB Position Statement on Setting clearly sets out that the legislative duty for LPA's is to consider 'Setting' and to properly assess applications that may adversely impact on AONB Setting.

- 9.149 Paragraph 8 of the NPPF states that the environment has an important role in achieving sustainable development, particularly through the protection and enhancement of the natural, built and historic environment. Further to this paragraph 170 of the NPPF states that the planning system should aim to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.

- 9.150 NPPF Paragraph 172 states “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of

development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

- 9.151 Section 85(1) of the CROW requires relevant authorities to have regard to conserving and enhancing the natural beauty of the AONB.
- 9.152 The application site is largely located within the Vale of White Horse Landscape Character Area ('VWHLCA'), as outlined within the Landscape Character Areas SPG ('LCASPG') (2004), which is primarily flat and open, generally with small scale settlements and extensive views to the south of the North Wessex Downs Area of Outstanding Natural Beauty (AONB). A small part to the east of the site is located within the Scarp Landscape Character Area ('SLCA'). The application site is immediately adjacent to the AONB to the south, so must therefore accord with the relevant criteria of the NWDMP and not adversely affect the AONB's setting. As outlined earlier within this report and as illustrated on the 'Opportunities and Constraints Plan' (p11, Landscape Strategy), there is an extensive network of Public Rights of Way (PRoW) through the application site and within the surrounding area.
- 9.153 A Landscape Visual Impact Assessment (LVIA) has been submitted within the Environmental Statement (ES), and assesses the potential impacts of the development. The LVIA and ES Chapter 7 were revised to reflect the resubmission, although principally result in the same conclusions.
- 9.154 The North Wessex Downs AONB Board and Councils Landscape Officer object to the application and raise a number of significant concerns with the proposed development including the adverse impact from the proposed development on the LCA's and setting of the AONB. Natural England have provided comments on the proposed development and state that great weight should be given to the comments submitted by North Wessex Downs AONB Board and the Council's Landscape Officer. Woodland Trust also object to the proposed development on the ground that it could negatively affect Warneage Wood.

Landscape Character

- 9.155 The scheme provides full details for Phase 1, which consists of a 14.5m high

industrial unit located close to the southern boundary of the application site. It would measure approximately 165m (north to south) and 175m (east to west), with the elevations primarily clad in green panels and the roof including sections of green roof and photovoltaic panels. Phase 2 forms an outline submission, with indicative details provided on the Parameter Plan Composite Rev P9 and Indicative Site Plan Phase 2 Rev P10 (Full Masterplan) (both dated July 2018).

- 9.156 The submitted Landscape Strategy (Feb 2020) identifies the key opportunities and constraints which informed the proposed development. Whilst it oddly does not acknowledge Policy EN5 of the Local Plan, it refers to the design considerations and mitigation measures it proposes to, in the applicants opinion, ensure that the proposed development would not adversely affect the special qualities of the LCA's and AONB.
- 9.157 Chapter 7 of the ES states that in the applicants view the key landscape features within the wider area include the tower and spire of Wanborough Church; mature trees around the south-west corner of the site; and Liddington Hill and fort. Further to this, it suggests that the application site does not contain any distinctive landscape features other than the mature hedgerows and trees, which although few in numbers, are mature and form locally important features.
- 9.158 The AONB is located immediately adjacent to the application site to the south, and is characterised by a large tract of chalk down land. The overall character of the area is rural. The surroundings of the AONB are important to its landscape character and quality. Views out of the AONB and views towards or into it from surrounding areas can be very significant. The application site also forms the immediate foreground of the AONB escarpment to the south, and contributes to the setting of this nationally significant landscape. The application site and surrounding field network provide expansive views up towards Upper Wanborough, St Andrews Church and Liddington Hill an iconic landscape feature within the AONB. Due to its open character at the foot of rising landforms merging with the wider open countryside, the application site provides a sense of separation and spaciousness which reinforces the separation of Swindon, Wanborough and Liddington.
- 9.159 Chapter 7 of the submitted ES states that "*There would be small indirect effects on the character of the area of AONB closest to the Proposed Development (the northern edge of Landscape Character Area 6C: Wanborough Vale) through changes to the setting of this area*" (p7.48). It concludes by stating that the magnitude of change to the AONB is likely to be small, with the adverse effect considered to be minor to moderate at year 1 and year 15. The applicant's findings are confirmed in Table 7.17 where it states that the proposed development is not considered to have a significant effect on the AONB. Both the AONB Board and Councils Landscape Officer consider these conclusions to be unsubstantiated and understated. The application site abuts the AONB and is within its setting, which is given the same weight as land within the AONB, as

outlined within Local Plan Policy EN5 and NPPG. As a result, the landscape value of the site should not be any less because of its proximity to the urban edge of Swindon.

- 9.160 Given the indivisibility between LCAs within and outside the AONB, new development in this location is within a landscape which is sensitive to change. The NWDMP outlines a number of key issues which have the potential to have a significant influence on the special qualities of the AONB including “a) *The potential for development beyond the AONB boundary to visually damage or undermine the scale and critical qualities of landscape character areas*” and “o) *Intense pressure for development throughout the AONB and its setting that threatens the character and quality of its landscape and risks merging of small settlements, encroachment by larger settlements and changes to the scale and nature of development boundaries*” (p23-24, NWDMP). The siting, scale and nature of the proposed development would result in an unacceptable level of urban encroachment to a sensitive rural area, which contributes to the character and quality of the landscape and surrounding settlements, contrary to the NWDMP.
- 9.161 ES Chapter 7 and the LVIA outline that in the applicants view the application site demonstrates clear characteristics from the VWHLCA such as extensive views to the downs, presence of ponds and a stream; fields bounded by hedgerows and scatter trees; and field pattern of large fields. It also suggests that the application site is not typical of the wider landscape character area primarily due to topography, vegetation cover and openness to view. The submitted information also suggests the application site is more influenced by the urban edge of Swindon, and that background noise from the traffic on the A419 diminishes the characteristic of remoteness. Overall, it considers the application site to have a low-moderate level of representativeness of the VWHLCA.
- 9.162 Part of the application site is located within the SLCA, and whilst the submitted information refers to this landscape character area, it offers no detailed evaluation or conclusion on how representative the application site is of the SLCA. The setting provided by both the VWHLCA and SLCA is crucial in supporting the countryside experience of receptors using roads (e.g. Pack Hill/Ham Road/The Ridgeway etc.) and footpaths both within and outside the site (e.g. from the AONB at Liddington Hill etc.). Further to this, Officers disagree with the assertion that the application site is less representative of the VWHLCA due to its proximity to Swindon urban area. The application site is located on agricultural land within the countryside between Swindon and Wanborough, with clear rural separation from the Swindon urban area. The site is experienced in the rural context, and whilst the A419 can be heard in the background across parts of the site, it is not considered to diminish the appreciation for being out in the countryside. Whilst a small number of buildings in the east of Swindon are visible, such as the Great Western Hospital, the open fields and vegetation, particularly when looking west across the application site from Upper Wanborough are such that the views and

rural experience are not considered to be compromised by the proximity to the Swindon urban area. This undeveloped area of land forms an important break in settlement between Swindon and Wanborough, and contributes to the rural setting of Wanborough itself, and the wider planned countryside setting for the NEV, which is protected by the non-coalescence area, as identified in Policy NC3 of the Local Plan. The application site is therefore considered to provide an important contribution to the VWHLCA and its wider setting.

- 9.163 The 'Development Considerations' for both the VWHLCA and SLCA recommends that developments should *"Retain the perception of distinctiveness and separation from Swindon within the Rural Buffer area identified in the Local Plan"* (p8-10, LCASPG). The siting, scale, bulk and nature of the proposed development, in addition to the creation of additional light and noise pollution for up to 24 hours a day, would result in a significant urbanising effect on the land between Swindon and Wanborough, compromising the way the rural approach to Wanborough is experienced and the area of non-coalescence which seeks to protect the character and identity of Wanborough. As a result, significant and permanent harm would be caused to the VWHLCA and SLCA. The primary harm would be to VWHLCA by virtue of it making up the greater proportion of the site, but the impact to the 'Scarp' considerations such as to the open existing views northwards being irrevocably harmed by a development of this scale and bulk in the foreground, would also be undermined.
- 9.164 The submitted ES identifies a number of Local Landscape Character Areas (LLCA) and identifies the application site as being across LLCA3 and LLCA4. The methodology and findings appear different between the original (November 2018) and revised (April 2020) LVIA ES Chapters, without offering a clear explanation as to why. The revised ES Chapter gives 'Low/Ordinary' - 'Medium' value to LLCA4 (Inlands Farm), based on the evaluation that this landscape has 'little scenic or landscape importance'. Given this LLCA forms part of the setting of the AONB, as protected by Policy EN5 of the Local Plan, Officers do not consider this to be justified.
- 9.165 Chapter 7 of the ES identifies LLCA1 as Warneage Wood, which is an area of woodland to the north of the application site, planted as community forest in 1994/95. The ES suggests that the proposed development is unlikely to result in any direct change to the existing landscape characteristics, but that the rural woodland character of the south-western part of the site would be weakened slightly. The Woodlands Trust, who own Warneage Wood have objected to the proposed development stating *"the development will cause visual degradation of the unspoilt landscape to the west of Warneage Wood, and will consequently change the wood's immediate environment from its current tranquil rural appearance to a busy sub-industrial landscape"*.
- 9.166 ES Chapter 15 considers Lighting, and whilst Chapter 7 acknowledges within the text that lighting from the proposed development would result in a change to the

character of a number of specific character areas and would be visible from certain viewpoints, the harmful effects from lighting have not been considered with Tables 19.1 and 19.2 (Chapter 19). Both the AONB Board and Council's Landscape Officer disagree with this approach. The detailed design of lighting would usually be controlled by condition or through the reserved matters process, however Chapter 4 of the ES and Landscape Strategy identify some indicative lighting designs, as well as the areas likely to be lit, which includes the main access roundabout and road, internal roads, car parking areas and loading bays. Given the proposed development would be operating 24 hours a day, the light emitting from the lit areas, in addition to the light spill from the buildings, would at times produce a prominent glow in the sky, which would be a marked change from the existing rural character of the site, adversely affecting the existing landscape setting.

- 9.167 Whilst Chapter 19 now describes these Cumulative Effects, only part of LLCA5 'River Cole Farmlands' includes any specific 'Cumulative Effect' values, with just a written description of the predicted overall effect provided for the other LLCA's. Tables 19.1 and 19.2 within Chapter 19 highlight unchanged 'adverse' impacts across the phases, including 'Changes to Nationally Designated Landscape' - Moderate Adverse, 'Changes to Local Landscape Character' - Major Adverse, 'Changes to Landscape Features' – Minor Adverse. These findings appear inconsistent with the conclusions identified with Table 19.5 where no cumulative impacts would be felt beyond the proposed development in isolation. In addition, the previous ES (November 2018) included Table 9.17 'Cumulative Landscape Effects' which has not been replicated within the revised submission. These omissions and inconsistent conclusions, in addition to a number of other changes to the LVIA ES Chapter make the assessment appear confusing and the conclusions unjustified. They also undermine the applicants' assertion that there will be no cumulative visual effects associated with this application. Overall, Officers consider the cumulative landscape effects to be understated, and that the substantial scale, bulk and siting of the proposed development would urbanise the character of the application site and surrounding landscape, thereby failing to conserve and enhance the character and quality of the AONB landscape and its setting.
- 9.168 The colour coding and proposed breaks in the elevations, as well as the green roof of the phase 1 building has improved its appearance from the original submission, however the use of photovoltaic panels and polycarbonate is considered to urbanise the appearance of the proposed development, increasing its visibility. Paragraph 7.37 of the NWDMP outlines key issues from development which have the potential to have a significant influence on the special qualities of the AONB, such as "*d) The loss of rural character through suburbanising influences from new development (new fencing, lighting, signage, parking areas, paved footpaths, loss of native hedgerows and creation of new garden areas)*" (p79, NWDMP). The proposed scale and nature of the proposed development along with the substantial amount of hard standing for the car parks and associated roads, as well as the associated noise, light and paraphernalia such as

the security fencing and gatehouse would introduce an incongruous built form within the open countryside, which would have an urbanising and detrimental impact on the quality and character of the AONB, in an area which has a key role in preventing urban sprawl and in protecting the character of Wanborough and the surrounding villages, contrary to the NWDMP.

- 9.169 Chapter 7 of the submitted ES outlines a number of future changes to the surrounding area including the proposed two blocks of woodland planting to the south of Pack Hill, the Southern Connector Road (SCR) and the New Eastern Villages (NEV). The two blocks of woodland planting are within the AONB, in an otherwise generally open landscape. The proposed landscaping for this application in addition to these woodland belts would exacerbate the significant enclosure of the application site, resulting in increased sense of separation from the AONB. The woodland belts are also located on land outside of the control of the applicant and therefore cannot be relied upon to form mitigation. Whilst the SCR will introduce a new unlit road and lit roundabout, this is primarily a linear feature with landscaping characteristic of the surrounding area and is unlikely to significantly alter the character of Pack Hill, particularly on the approach to Upper Wanborough. As identified above, the NEV is a strategic site allocated within the Local Plan. The SCR was considered within the wider allocation of the NEV, whilst the non-coalescence area forms a significant component of the wider masterplanning and landscape strategy for the NEV. The proposed development would compromise these strategic proposals of the Local Plan.
- 9.170 The application site is currently agricultural in use and forms part of the surrounding rural landscape character. It contributes to the VWHLCA and forms an important part of the AONB setting. The siting, scale, massing and nature of the proposed development, in addition to the visual clutter such as car parking and fencing and associated effects such as noise and light, would significantly urbanise and result in a high magnitude of change from the existing character of the application site and surrounding area. The proposed development would result in the loss of open, undeveloped countryside causing significant harm to the intrinsic character of the LCA's and setting of the AONB, as well as comprise the wider masterplanning of the NEV and the non-coalescence area, contrary to Local Plan Policies EN10 and NC3, the NWDMP and the NPPF.

Visual Impact

- 9.171 Chapter 7 of the submitted ES identifies in the applicant's opinion the primary views of the site including those towards and across the site from Upper Wanborough, some from the southern edge of Liddington and short-distance views from Warneage Wood. Further to this, it outlines that the key long distance views from the site as those towards the AONB to the south, as well as referencing Upper Wanborough the east and the Great Western Hospital to the west. Paragraph 7.153 concludes in the applicants view that there are a lack of noticeable landscape features and that the site blends into the surrounding area.

The presence of perimeter hedgerows leads the ES to conclude that the site makes a low contribution to the visual amenity of the local area.

- 9.172 To support the proposed submission, a number of 'Representative Views' (Fig 7.10) and 'Accurate Visualisations' (Fig 7.11) have been submitted alongside the ES. Tables 7.15, 7.16 and 7.17 outline in the applicants view the sensitivity of the receptors and the effect of the proposed development on the receptors. Officers do not agree with the number of the conclusions identified with Tables 7.15 and 7.17, and consider the adverse effects to be understated. In particular, the AONB Board and Council's Landscape Officer disagree that the adverse effects for PRoW users on Liddington Hill would be 'Minor to Moderate' and users on 'The Ridgeway' would be 'Minor'. The proposed development would be operating 24 hours a day, 7 days a week therefore significantly increasing the levels of noise, light and activity from vehicles and HGV deliveries. The quantum of buildings and hard standing, as well as the significant areas of parked cars and HGVs would significantly increase the visibility of the site. This would represent urban encroachment in to open countryside, resulting in a negative effect on PRoW and road users from views within the AONB, and causing significant harm.
- 9.173 Further to this, Table 7.15 states that it 'Year 1' there would be a change in the character of the views from the site to include large scale built development and that *"In places, views towards Liddington Castle will be obscured by built development in the foreground of the view"*. The existing PRoW throughout and around the application site are located within a rural setting, and there is currently limited visual intrusion, particularly when looking south to Liddington Castle and the AONB. It is clear from the large number of representations received in relation to this application that the footpaths across the site are well used by residents, particularly for recreation opportunities and to enjoy, appreciate and experience the countryside. The proposed development would introduce a number of large buildings and associated structures including the Phase 1 building measuring 165m (north to south) and 175m (east to west) and 14.5m in height, which would introduce an urban environment to the rural setting and result in the loss in a number of views from the PRoW. The proposed PRoW throughout the site would be contained and feel restricted by the proposed buildings, security fences and landscaping, resulting in a loss to the existing openness. In addition, the noise and activity associated with the proposed development would be a sharp contrast to the existing stillness, resulting in a loss of tranquillity and diminishing the rural experience currently had by users of the PRoW.
- 9.174 The site is visible from a number of surroundings roads including Pack Hill, The Marsh and the A419, as well as some nearby properties. By virtue of the nature and scale of the proposed development, it would be highly visible from vantage points on these roads and properties, particularly during winter months when vegetation is at its thinnest. It would appear as an awkward addition to the existing landscape, out of context and character, particularly the design and materials of the west facing elevation. The application site contributes to the wider landscape character, including the setting of Upper Wanborough and the AONB. The

proposed development would form a significant urban addition to this setting, diminishing the rural experience for the users of these roads, in particular on Pack Hill when approaching Upper Wanborough and nearby land owners.

Landscape Mitigation

- 9.175 The applicant has sought to demonstrate how potential landscaping could result in negligible impacts on completion and a moderate beneficial effect over time once it has become established. The Landscape Strategy outlines these measures which include woodland belts on the northern and southern edges; a non-coalescence area in the south-east corner; a green spine through the centre of the site; as well as hedgerows, SuDS and biodiversity opportunities throughout the site. The orientation of the buildings, breaks in the elevations and inclusion of green roofs has also been proposed to, in the applicant's view, minimise the impact of the proposed development. The provision of these measures suggests that the applicant acknowledges that the proposed development would be a harmful addition to the existing landscape.
- 9.176 The proposed woodland belt would appear rigid and uniform, and would cocoon the proposed development, attempting to hide it from view. This buffer of trees would only act as a wall preventing any interconnectivity between the AONB and its setting. The proposed landscaping, park areas and GI corridors throughout the site would appear formal. For these areas to function effectively as open space, active management of that land as well as footpaths and associated paraphernalia would be required, which would inevitably distinguish it from the adjoining undeveloped agricultural land, such as the non-coalescence area identified within the Landscape Strategy (p41) (2020), in the south-east corner of the application site. The application information identifies this non-coalescence area as a way to minimise the impact of the development, particularly to Upper Wanborough, yet the proposed submission appears to place little value on the area of non-coalescence identified within Policy NC3 of the Local Plan, which seeks to protect the character of surrounding villages from inappropriate development.
- 9.177 The 'Accurate Visualisations' (fig 7.1) submitted by the applicant demonstrate that even with the colour coding work the buildings would still dominate the landscape, primarily due to the sheer mass of the proposed buildings. This also demonstrates an over reliance on landscaping buffers, which themselves would negatively impact upon the character of the Landscape Character Areas (LCAs), through the loss of openness.
- 9.178 Overall, Officers consider the benefits from the proposed mitigation to be overstated. Moreover, any benefits from landscaping would need to be weighed against the significant urbanisation of an agricultural site which positively contributes to the existing landscape character. The mitigation measures would never completely screen the built form within the proposed science park, but

would transform the open landscape by closing off distant views over the countryside and by increasing the sense of enclosure. The proposed landscaping scheme and mitigation measures would fail to form a cohesive bond with the existing built environs and would be out of character with the local LCA's and quality and character of the AONB and its setting.

Summary Landscape

- 9.179 The extent of the proposed development would erode the predominantly agricultural landscape between Swindon and Wanborough. By virtue of the proposed developments scale and use, it would introduce an uncharacteristic urbanising feature to the landscape that would be detrimental to the surrounding area, resulting in direct harm to Wanborough village and the AONB and its setting. It would diminish the quality of the visual and environmental experience both close to and at a distance for those out to enjoy a walk in the countryside or standing to appreciate the more long distance view, particularly towards the AONB.
- 9.180 The application site is outside of the settlement boundary and forms an important part of the countryside which separates Swindon, the NEV and Wanborough and the surrounding villages, as identified by the non-coalescence area (Policy NC3). The application site makes an important contribution to both the VVHLCA and SLCA, as well as the setting of the AONB.
- 9.181 The proposed development would have an adverse impact on the existing landscape character and visual amenity levels currently experienced, and would reduce the ability to enjoy recreational opportunities in the countryside. The proposed development fails to protect, conserve and enhance the intrinsic character and distinctiveness of the landscape; would have an unacceptable impact on the landscape; does not provide a design nor use materials sympathetic to the surrounding landscape; and fails to satisfactorily mitigate these negative impacts, contrary to Policy EN5 of the Local Plan. The proposed development would also result in significant harm to the setting of the AONB, contrary to Policy EN5 of the Local Plan and the NWDMP. It would also fail to comply with the relevant provisions of the NPPF which recognises the intrinsic character and beauty of the countryside and attaches great weight to conserving and enhancing the landscape and scenic beauty of AONBs.

Green Infrastructure, Community Forest, Ecology and Biodiversity

- 9.182 Policy EN1 of the Local Plan states development shall protect and enhance green infrastructure and assets which includes the requirement that development must provide for the protection and integration of visually or ecologically important existing trees, hedges and woodlands.
- 9.183 Policy EN2 of the Local Plan requires development to contribute directly towards the objectives of the Great Western Community Forest (GWFC). This will be

achieved by ensuring a net increase in tree cover through planting; the creation or enhancement of habitats for biodiversity; and by ensuring access for local communities to local woodlands.

- 9.184 Policy EN4 of the Local Plan states that development will avoid direct and indirect negative impacts upon biodiversity and geodiversity sites, as identified on the Policies Map. It also states that all development shall protect and enhance biodiversity and provide local biodiversity gain.
- 9.185 NPPF Paragraph 170 states that the planning system should aim to contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity value, recognising existing trees and woodland and minimising impacts on and providing net gains for biodiversity.
- 9.186 Further to this, Para 170 of the NPPF states the potential benefits resulting from the best and most versatile agricultural land should be recognised. Whilst there appears to be minimal information on this element within the application submission, the land is considered by Officers to be Grade 3 and as such is not considered to be the best or most versatile.

Green Infrastructure

- 9.187 The NPPF (Annex 2: Glossary) defines green infrastructure as “*a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities*”. Further to this, the PPG states “*to ensure that these benefits are delivered, green infrastructure must be well planned, designed and maintained*” (Paragraph: 028 Reference ID: 8-028-20160211).
- 9.188 The submitted Landscape Strategy (February 2020) outlines potential design principles and landscape opportunities for mitigation and enhancement. The primary proposals include a green spine from the site entrance to the northern boundary, the creation of a woodland belt to the south and east and integral landscape planting and SuDS areas.
- 9.189 The PPG states that “*as with other forms of infrastructure, green infrastructure requires sustainable management and maintenance arrangements to be in place if it is to provide benefits and services in the long term*” (Paragraph: 031 Reference ID: 8-031-20160211). The proposed submission is not clear on the long term management and maintenance proposals. Officers understand however that the proposed green infrastructure, planting and landscaping would be implemented and managed by the developers or conveyed to a separate company to take on the long-term management. A clause in an appropriate legal agreement would require further detail of the management and maintenance responsibilities to ensure longevity and provide assurances over appropriate access for the public in perpetuity.

Great Western Community Forest (GWCF)

- 9.190 The adopted Forest Plan objectives for the Swindon Forest Area include increasing tree cover to a minimum of 35% land area and supporting an integrated planning approach to new development incorporating significant environmental, social and economic gains for the community. One of the primary principles of the adopted Community Forest Plan is planting new forest. This can be achieved through a combination of on-site planting and / or provision of financial contributions towards off-site mitigation.
- 9.191 The submitted Landscape Strategy (Feb 2020) outlines proposals for a woodland belt as well as planting throughout the site. The application site is currently open agricultural land, and therefore the additional planting tree would contribute towards the GWCF objectives. The cumulative quantum of woodland planting on-site is not clear from the proposed submission, and therefore were the planning application recommended for approval, further on-site woodland planting or off-site contributions would potentially be sought to ensure the GWCF objectives are met. A legal agreement or other appropriate mechanism would be required to secure these on-site contributions, particularly in terms of management and maintenance or off-site contributions. In the absence of this, the proposed development is not considered to meeting the objectives of the GWCF in accord with Policy EN2 of the Local Plan.

Ecology and Biodiversity

- 9.192 The existing site consists of open agricultural fields, with a number of hedgerows and trees located throughout. As identified within the ES, there are no Sites of Special Scientific Interest (SSSI) within or adjacent to the application site. Both Coate Water SSSI, which primarily forms a wetland habitat for breeding birds, and Coombs, Hinton Parva SSSI, which is a grassland and woodland habitat, are located within 2km of the application site. The submitted ES states that nature of the proposed development and distance is such that no adverse effects are expected for these sites.
- 9.193 In terms of Local Wildlife Sites (LWS), the ES identifies five within a 2km radius including the River Cole LWS to the west of the application site. Warneage Wood is a community woodland, managed by the Woodland Trust, located approximately 50m to the north of the application site. The Woodland Trust has requested potential mitigation measures and contributions in the event that the proposed development proceeds.
- 9.194 The submitted Landscape Strategy (Feb 2020) and ES (Chapter 18 and appendices) outline a number of objectives and mitigation measures to protect and enhance existing habitats and wildlife. They indicate that none of the hedgerows within the application site are considered to be 'important', and over half (730m) of the existing hedgerows will be lost. Approximately 300m of new

species rich hedgerow is proposed, along with 150m of treelines and 1.7ha of mixed woodland. Other forms of mitigation include bat roosts incorporated in to the proposed buildings and new wetland and grassland areas for newts.

- 9.195 The Council's Ecologist noted that surveys of protected species had been carried out, but requested further clarification on a number of the surveys undertaken as well as additional evidence relating to net biodiversity gain. Whilst these queries are outstanding, Officers consider on balance that these could be resolved through an appropriate planning condition, and therefore a refusal reason on these grounds is not warranted in this instance. Overall, the submitted information which proposes a number of mitigation measures, in combination with consultee responses is such that Officers do not consider it likely that the proposed development would have a significant effect on a protected habitats site, SSSI or LWS.

Transport and Highways

- 9.196 Policies TR1 and TR2 of the Local Plan seek to ensure access for developments that is appropriate to the scale, type and location of the proposal without detriment to highway safety, traffic movement and the local environment. They also seek to reduce the need to travel and support and encourage sustainable, safe and efficient movements throughout the Borough. Policy CM2 of the Local Plan seeks to promote active, healthy and safe lifestyles through increasing opportunities to walk and cycle and encouraging more sustainable travel choices. Policy NC3 of the Local Plan refers to the Southern Connector Road, to connect the NEV to Commonhead.
- 9.197 Section 9 of the NPPF promotes sustainable transport measures, particularly those which contribute towards the wider sustainability and health objectives. Further to this, NPPF Para 103 states *"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making"*.
- 9.198 NPPF (para. 108) requires developments to provide sustainable transport opportunities; that safe and suitable access to the site can be achieved by all; and that improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The NPPF is clear that *"development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe"* (para. 109).

- 9.199 NPPF Para 111 states *“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”*.
- 9.200 The Development Control Guidance Note (DCGN) Technical Guidance on Parking Standards sets out the current parking requirements for development.
- 9.201 The initial application submitted in 2018 proposed a temporary access to Phase 1 from Pack Hill. As part of Phase 2, a new access directly from the roundabout proposed as part of the SCR would serve the entire Science Park. Through the public consultation, a number of concerns were raised with this approach. The revised application proposed revisions to the Phase 1 boundary to deliver the proposed roundabout access as part of Phase 1. The access originally proposed from Pack Hill, has therefore been deleted from the scheme.
- 9.202 The application includes Chapter 12 of the ES and is accompanied by a full Transport Assessment and associated technical notes and appendices, which have been comprehensively reviewed. The Local Highway Authority (LHA) raised a number of concerns through the original public consultation, and a further Technical Note (dated June 2019) was submitted to address these. Highways England (HE) have requested additional information in relation to the impact of the proposed development on the Strategic Road Network (SRN), and issued holding direction recommending that planning permission not be granted for a period of 6 months (issued 8th April 2020). In the event that the Council disagree with this recommendation, the Secretary of State must be consulted.

Phase 1 (Full)

Transport Impact

- 9.203 Full planning permission is sought for Phase 1 of the proposed scheme, and as a result detailed design is required for a number of elements. Information was submitted outlining the trip generation from the existing Wasdell operations. Delivery data to advise of the design of the servicing areas, as well as trip accumulation and recorded delivery information was also provided. The Local Highway Authority (LHA) requested that mode share be assumed to be 90% car occupancy, and further information was submitted to support this. These details were considered acceptable by the LHA.
- 9.204 Given the scale and nature of the proposed development, and proximity to Commonhead and the A419, it has the potential to impact the SRN. Traffic flow information for these sections of road as well as analysis if the slip roads for Commonhead was provided as part of the application, particularly given the wider changes to Commonhead roundabout as part of the Southern Connect or Road (SCR) and Junction 15 of the M4. Notwithstanding the concerns in relation to the proposed use classes identified above in paragraphs 9.10 to 9.17, Phase 1 of the

proposed development includes Class B1c use and therefore a worst case scenario for trip rate generation was required. These elements were accepted by the LHA.

- 9.205 Given the proximity to the SRN, a key consideration was the potential impact of the proposed development on the existing highway network during peak hours. The LHA had previously said they would welcome an assessment of both the AM pre-peak hour and the normal peak hours. The pre-peak hours may represent the highest AM impact and flow. The assessment has been undertaken on the worst peak hour. Given the committed improvements to Commonhead Junction, it was found by the LHA that the traffic impact of Phase 1 of the proposed development would operate within capacity in the 2021 weekday morning and evening peak hour periods and that the net traffic increase above the consented development will result in negligible increases to forecast queuing and delay.
- 9.206 A number of transport concerns were raised by residents in terms of the increased levels of traffic for both workers and HGVs and the potential for increased rat-running through nearby villages. Works are proposed to commence on improvements to Junction 15 of the M4 in summer 2020, which would increase the capacity of this junction. The delivery of the SCR would also result in improvements to Commonhead Junction. In addition, the proposed development proposes to operate a number of shift patterns and the direction of traffic at peak hours is likely to be opposite to current trends. As a result of these considerations, routes through nearby villages are likely to form less attractive routes for employees and delivery vehicles.

Site Access

- 9.207 The site would be accessed from a spine road directly from the proposed roundabout. Phase 1 would be accessed directly from this Spine Road. A merge/diverge assessment was included within Appendix H of Technical Note 02 which demonstrated that the existing infrastructure will be able to accommodate the additional traffic generated by the proposed development in 2021 and that wider improvements to the network would mitigate any impact in 2036.

Parking

- 9.208 The LHA initially raised concerns with the calculation for parking standards, particularly in relation to whether the proposed application site was considered more unsustainable than existing sites. As a result, a modal share of 90% car use has been used for assessment purposes, suggesting 1,080 arrive by car across three different shifts. Given the inevitable crossover, 720 cars may be accommodated subject to car occupancy and whether shift patterns can be separated to allow end shift leave and start shift to arrive segregated. Further staff travel information was submitted by the applicant and parking provision on-site has been increased, and as a result is considered acceptable by the LHA.

Passenger Transport

- 9.209 Whilst the vicinity of the application site is served by the 46A/48A bus routes (operated by Wiltshire Council), services to and from Swindon are currently limited. The applicants have proposed a shuttle bus service that would connect with Fleming Way at regular intervals at peak times. To ensure sufficient capacity, a double decker bus is proposed, however the precise details of this would need to be secured through an appropriate legal agreement.

Phase 1 Summary

- 9.210 The LHA consider that the proposals for Phase 1 are consistent with relevant national and local transport policy and would not result in a significant transport impact, that the design proposals would comply with the relevant design guidance and that there would be opportunities for sustainable modes of transport, which would be enforced by a Travel Plan.

Phase 2 (Outline)

- 9.211 Phase 2 of the proposed development would include the remainder of the Science Park, including Class B1b and Class B1c uses. HE and the LHA raised concerns relating to the operation and safety of the SRN, in particular the A419 Commonhead junction, the A419 White Hart junction and M4 junction 15. Further evidence is required to determine the transport impact from the entire proposed development and to determine the need for any potential mitigation. Currently, insufficient information has been submitted to satisfy these concerns and Highway's England have recommended that permission is not granted for 6 months to enable these impacts to be assessed.

Summary Transport

- 9.212 Overall, Stage 1 of the proposals are considered acceptable to the Local Highway Authority in transport and highway terms subject to an appropriate legal agreement and relevant planning conditions. With regard to Phase 2, Highway's England have recommended that planning permission not be granted for 6 months, whilst insufficient information has been submitted for the LHA to determine the impact of the development in accord with Local Plan Policy TR2.

Flood Risk, Water and Sewerage InfrastructureFlood Risk

- 9.213 Policy EN6 of the Local Plan seek to minimise the risk of flooding within the development and at existing neighbouring communities. They also state that all developments must assess local flooding and drainage issues, and incorporate sustainable drainage systems (SuDS) where mitigation is required.

- 9.214 In addition, Paragraph 163 of NPPF states that LPA's should "*ensure flood risk is not increased elsewhere*" and that "*within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location*".
- 9.215 The application site is entirely located within Flood Zone 1. The closest water course to the application site is Liden Brook, which is an Environment Agency designated Main River, located approximately 150m to the west. Two existing ditches run across the site and discharge in to Liden Brook. Given the proposed increase in hardstanding areas from the buildings and associated parking, and the known existing flood issues in the surrounding area, justification is required to demonstrate the proposal can meet the requirements of Policy EN6 and the NPPF.
- 9.216 Chapter 11 of the ES outlines the key issues relating to flooding and includes the submitted Flood Risk Assessment. The surrounding area is known to have issues with ground water flooding, and as a result infiltration techniques are not considered to be a viable option. The primary proposed measures to manage flooding on-site include above ground green drainage and a series of SuDS techniques such as ponds and swales which result in the application site discharging at greenfield run-off rate. Water quality management is proposed to be delivered through a combination of methods including drains, filter strips, swales, permeable parking and ponds. To ensure the drainage networks can operate effectively, appropriate management and maintenance of SuDS is required. The submitted ES suggests that measures such as clearing the drains and swales should happen monthly. Whilst the LLFA requested additional information as part of the revised consultation, the proposed drainage scheme in combination with the proposals for green roofs are such that, in principle, an acceptable drainage scheme could be delivered on the application site. Planning conditions requiring further detailed design work and ensuring the delivery of appropriate green roofs would be recommended by the LLFA, were the application being recommended for approval.

Water and Sewerage Infrastructure

- 9.217 Local Plan Policy IN2 seeks to ensure development proposals take account of the capacity of existing off-site water and sewerage/waste water treatment infrastructure and the impact of development proposals on them.
- 9.218 Paragraph 162 of the NPPF requires Local Planning Authorities to work with other authorities to assess the quality and capacity for water supply, wastewater and its treatment, whilst being encouraged to adopt proactive strategies to mitigate and adapt to climate change by taking full account of flood risk, and water supply over the longer term.
- 9.219 Paragraph 170 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local

environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

- 9.220 The Planning Practice Guidance (PPG) states “*Adequate water and wastewater infrastructure is needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change*” (Paragraph: 001 Reference ID: 34-001-20161116).
- 9.221 Consultation comments received from Thames Water indicate that the existing waste water infrastructure and water supply is currently insufficient to accommodate the requirements from the proposed development. They have stated that the current waste infrastructure could accommodate 625 sqm of commercial floorspace, whilst the water supply could accommodate 23,040 sqm of floorspace. Thames Water have indicated that they are working with the applicant to identify and deliver the off-site foul water and water supply infrastructure, and if the application were to be recommended for approval then planning conditions should limit development to these thresholds until a strategic infrastructure solution is in place. It is not clear on the timeframes involved for the delivery of these strategic infrastructure solutions.
- 9.222 Given the current capacity issues in relation waste water and foul drainage, the Environment Agency (EA) have reviewed the planning application in relation to water quality. Due to the current capacity issues, the Foul Water Drainage and Utilities Statement (Feb 2020) states “*Thames Water has therefore proposed to provide a foul pumping station adjacent to Wanborough Wastewater Treatment Works to divert flows from the existing 225mm foul sewer and the proposed development up to the Swindon NEV development*” (Para 3.1.6, page 12). The EA have concerns that without adequate capacity there is a risk that sewage flooding and/or potential pollution incidents could occur.
- 9.223 There are suggestions from Thames Water that the upgrades to 2021 could be provided, however further strategic upgrades would likely be required to serve the NEV strategic allocation. The EA are also concerned that it may not be possible to create a new Wastewater Treatment Works (WwTW). In the absence of a timeline of improvements to the infrastructure and occupancy, the EA object to the proposed development on the grounds that application fails to demonstrate that the risks of pollution posed to water quality can be safely managed.
- 9.224 Policy WCS6 of the adopted Wiltshire and Swindon Waste Core Strategy (2009) requires that developments be designed and provide facilities for occupiers of the development to recycle/compost waste and/or facilities within individual or groups of properties or premises for the source separation and storage of waste types for recycling and/or composting. Policy WCS6 also requires that a waste audit be undertaken. Were the application being recommended for approval, a planning

condition would be proposed requiring the specific details be submitted prior to the commencement of development.

Residential Amenity, Pollution, Climate Change and Contaminated Land

- 9.225 Policy DE1 of the Local Plan requires development proposals to protect amenity in terms light, privacy, outlook, noise, disturbance, smell, pollution and space. Policy EN7 also seeks to protect existing uses and proposed developments from inappropriate levels of pollution. Policies EN8 and EN9 of the Local Plan state that development on land that is either unstable or contaminated, shall only be permitted where an appropriate evaluation of the precise nature of the instability or contamination has been undertaken, and that any required mitigation measures have been suitably identified.
- 9.226 Paragraph 180 of the NPPF states *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development...”*.
- 9.227 The application site is located approximately west of Wanborough village, whilst a number of residential properties are located along The Marsh to the north and west of the site. The current uses of the application site consist of agricultural farm land. The proposed development would represent a significant change from the existing use of the land and seeks permission to operate 24 hours a day, however the submitted evidence states that once operational the likely impacts on neighbouring amenity would not be significant.
- 9.228 The closest property to the application site is Applegate House, which is located immediately adjacent to the west. Chapter 14 of the submitted ES suggests that during the construction phase, the occupants of Applegate House could potentially be significantly impacted by noise and vibration during percussive piling activities. The ES refers to the continuous flight auger method which is an alternative method of piling, however there is no detail pertaining to the impact of this method from a noise and vibration perspective. Insufficient information has therefore been provided to demonstrate that there will not be a significant impact on the amenity levels of the occupants of Applegate House, in accord with Policies DE1 and EN7.

Pollution and Climate Change

- 9.229 Paragraph 150 of the NPPF states that *“New development should be planned for in ways that... a) avoid increased vulnerability to the range of impacts arising from climate change; and... b) can help to reduce greenhouse gas emissions...”*.
- 9.230 Chapter 17 of the ES identifies the potential impacts the proposed development could have on climate and its vulnerability to climate change. In terms of the

impacts of the proposed development on climate change, the ES states that emissions and the use of fuel is likely to be the key effects, although these are not anticipated to be significant. The greatest challenge to the proposed development from climate change is likely to be increased temperatures and either increases or decreases in seasonal rainfall. As discussed earlier within this report, the proposed development is unable to achieve BREEAM Excellent in accordance with Policy DE2. The submitted ES has outlined the intention of the proposed development to achieve BREEAM Excellent energy credits.

- 9.231 The application site is not within or adjacent to an Air Quality Management Area (AQMA) and is unlikely to have any significant effects on any other sensitive areas, such as Sites of Special Scientific Interest (SSSI). Chapter 13 of the submitted ES provides details on the potential impact on air quality, and suggests that during the operational phase of the development, the impact on air quality is unlikely to be significant. A majority of the mitigation measures would usually be controlled through a Construction and Environmental Management Plan (CEMP). The Environmental Health Officer has raised concerns that insufficient information has been submitted to ensure there will not be harmful impacts on the occupants of Applegate House, in accord with Policies DE1 and EN7.

Contaminated Land

- 9.232 Paragraph 179 of the NPPF states “*Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner*”. The application site currently operates as a farm for agricultural purposes. There is no evidence within the submitted application that there is any known anthropogenic activity on the site, and as a result the risk of ground contamination is low.

Infrastructure

- 9.233 Policy IN1 covers infrastructure provision and requires all development to make a positive contribution to sustainable growth in Swindon Borough. In the context of economic viability all development should meet the cost of new infrastructure made necessary by the development; mitigate the impact of development on existing infrastructure; provide for the on-going maintenance of infrastructure delivered as a result of development; contribute to the delivery of strategic infrastructure to address the cumulative impacts of development and contribute to initiatives to increase the effectiveness and efficiency of infrastructure.
- 9.234 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010 planning obligations should meet the following three tests as follows:
- (a) that it is necessary to make the development acceptable in planning terms;
 - (b) that it is directly related to the development; and
 - (c) that it is fairly and reasonably related in scale and kind to the development.

- 9.235 Policies EN1 and EN2 of the Local Plan require new developments to provide the appropriate level of GI and community forest planting, on-site or off-site, to mitigate the impact of development. An appropriate legal agreement or other mechanism to secure this infrastructure and its long term management and maintenance would be required.
- 9.236 Policy IN1 also refers to the provision of public art and public realm, which are usually required to enhance the appearance of developments. It is not clear from the proposed submission whether the scheme includes the provision of public art.
- 9.237 Policy NC3 of the Local Plan identifies the SCR as a key link to serve the NEV, which is the largest of the new communities allocated within the Local Plan. The SCR has full planning permission and construction is programmed to commence in 2021. The submitted application proposes site access directly from a roundabout which forms part of the SCR proposal and therefore proposes to deliver this element and associated sections of the SCR. Given the nature of the SCR, a legal agreement or other appropriate mechanism would be required in the event that the applicant would take on responsibility for delivering any of the SCR.
- 9.238 Given the application is being recommended for refusal, the required legal agreements identified above have not been completed.

Construction Stage

- 9.239 The submitted ES and associated appendices assess the potential impact of the proposed development on each of the relevant considerations including landscape, ecology and amenity of nearby residents, during the construction phase.
- 9.240 Applegate House is located within close proximity to the application site, and would therefore likely be impacted by noise, vibration and visual impact during any construction phase. As discussed earlier within this report, Environmental Health Officers require additional information to ensure there would not be an unacceptable impact on the amenity of this resident.
- 9.241 A number of mitigation measures have also been identified within the ES to ensure existing ecology and biodiversity habitats are protected. Measures have also been proposed to avoid issues from other elements of the construction process such as noise, dust, and vehicle movements. Were the proposed development being recommended for approval, planning conditions would be proposed to control these matters.

Other Matters

- 9.242 It is evident from the public consultation that there is a wide range of concern among local residents and interested parties. Many of these matters of concern

have been addressed within the above report, which in the Officers view, primarily centred around large scale development within the non-coalescence area, the availability of alternative sites for this development, the harmful impact on the countryside, wildlife, rural landscape and heritage assets, increased traffic and HGV trips, traffic rat-running through nearby villages and adverse impacts to amenity.

- 9.243 A number of representations received from local residents refer to the design, height and scale of buildings within Phase 2. The submitted Parameters Plan indicates that further buildings within Zone D would be no higher than 14.5m, whilst the remaining zones would have a maximum height of 3 storeys.
- 9.244 A number of other concerns referred to considerations including a drop in houses prices, however these are not material planning considerations and therefore cannot be considered by this application.

10 Planning Balance

- 10.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications should be determined in accordance with the Development Plan, in this case the Swindon Borough Local Plan 2026 (Local Plan), unless material considerations indicate otherwise.
- 10.2 The proposed development is a major departure from the adopted Local Plan, and would be contrary to the development strategy identified within Policy SD2, which seeks to direct employment uses within the Swindon Urban Area. The application site is within the countryside, and therefore the proposed use in this location is considered unacceptable in principle. Policy NC3 seeks to protect the character of nearby villages including Wanborough through the identified area of non-coalescence. The proposed development forms a substantial employment proposal in the countryside and within the area of non-coalescence, and is therefore contrary to Policies SD2 and NC3 of the Local Plan.
- 10.3 As identified at paragraphs 9.122 to 9.126 of this report, the proposed development would fail to conserve or enhance the significance of a number of heritage assets, including the Upper Wanborough Conservation Area. This would result in 'less than substantial harm' being caused to these heritage assets, through development within their setting, contrary to Policies EN5 and EN10 of the Local Plan. The nature and location of the proposed development would fail to protect, conserve or enhance the character and local distinctiveness of the existing landscape character and setting of the North Wessex Downs AONB, contrary to Policy EN5 of the Local Plan.
- 10.4 The proposal would therefore be in conflict with the development plan as a whole. Planning permission should accordingly be refused unless material considerations indicate otherwise.

- 10.5 The NPPF identifies the three dimensions to sustainable development as economic, social and environmental. To achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system.
- 10.6 Paragraph 11d of the NPPF states:
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 10.7 Footnote 6 of the above paragraph clarifies the policies which provide a clear reason for refusal as those which relate to considerations such as a National Park, an Area of Outstanding Natural Beauty and designated heritage assets.

Impact and Harm

- 10.8 Within the submitted application, the applicant concludes that the proposed development would result in 'less than substantial' harm to the significance of the heritage assets, through development within their setting. Historic England and the Council's Conservation Officer raise significant concerns with the proposed development, and consider that the harm to the significance of the Upper Wanborough Conservation Area and associated listed buildings is greater than that identified within the application submission. Officers have assessed the proposed development in accordance with the NPPF and relevant Acts, and whilst significant, consider the proposed development would result in 'less than substantial' harm to a number of heritage assets through development within their setting.
- 10.9 Officers consider that the harm to the Upper Wanborough Conservation Area and listed buildings within would be on the upper end of 'less than substantial harm'. The level of harm to the listed buildings on The Marsh and the Lower Wanborough Conservation Area is not considered to be as high on the scale of 'less than substantial', whilst the level of harm to other heritage assets including the Liddington Castle Scheduled Monument is considered by Officers to be on the lower end of 'less than substantial harm'.

- 10.10 The NPPF directs the decision maker to give great weight to the conservation of heritage assets. As discussed throughout this report, the scale, character and siting of the proposed development is such that it would result in a significant urbanising effect on the rural landscape setting, causing harm to a number of heritage assets from development within their setting. In accord with the NPPF, Officers attribute great weight to this harm.
- 10.11 In accord with Policy EN10 of the Local Plan and Paragraphs 194 and 196 of the NPPF, it then falls as to whether there is clear and convincing justification for the identified harm, when weighed against the public benefits of the proposed scheme. This balance is addressed in the paragraphs below.
- 10.12 The proposed development by virtue of its scale, siting, use and design would introduce an urban development to the existing rural context and result in significant harm to the landscape and intrinsic character and beauty of the countryside, fail to respect the area on non-coalescence and integrate itself with the wider strategic and comprehensive masterplanning of the New Eastern Villages, contrary to the NPPF and Policies DE1, NC3 and EN5 of the Local Plan. It would have a harmful impact on the context and character of the application site and Upper Wanborough, the visual amenity of views from within and across the application site, the intrinsic landscape character and the setting of the AONB, all of which merit significant weight.
- 10.13 As per paragraph 197 of the Framework, decision makers are also required to give weight to harm caused to non-designated heritage assets within the balancing exercise. As detailed in this report there is clear harm caused to the setting of non-designated heritage assets which is afforded weight within this balancing exercise.
- 10.14 The proposed scheme would also prejudice the delivery of the proposed Wilts and Berks Canal, contrary to Policy EN11 of the Local Plan, whilst the proposed submission has failed to demonstrate that there would not be an adverse impact on the water quality, neighbouring amenity, highway network and archaeology. These have cumulatively been afforded moderate weight in the balancing exercise.
- 10.15 In terms of the Statutory Consultees, there is an outstanding objection from Environment Agency and a direction of non-approval from and Highways England.
- 10.16 In addition, Officers have concerns that the proposed development may not fall within the Use Classes applied for. There is a suggestion within the application submission that operations from Burnley and Swindon would be relocated to this site, which could lead to an element of storage and distribution being undertaken at the site, whilst the submitted floor plan for the building within Phase 1 identifies large amounts of storage. Officers consider that the submitted application has

failed to provide sufficient justification to demonstrate that the proposed development would fall within the use classes proposed.

Public Benefits

- 10.17 With respect to the public benefits of the proposed scheme, Officers have given consideration to the economic benefits. If the proposed development were to be delivered in its entirety and all of the proposals were fully realised, there would be substantial benefits in terms of jobs. The retention and expansion of a local employer within Swindon would gain support from Policy EC1 of the Local Plan, however Para 4.60 qualifies this support and refers the decision maker to other policies within the Local Plan. The proposed development as a whole would lead to some economic growth and the potential for a cluster or network of industries, as supported by Chapter 6 of the NPPF. There would also be short term economic benefits through the construction phases, as well as the provision of indirect jobs, wider investment and associated local expenditure from persons in employment. As a result of these economic benefits, the Planning Statement (November 2018) outlines a number of social benefits including increased employment and wage expenditure, as well as increased training and skills opportunities. There would be an opportunity for education providers to have a presence at the proposed Science Park, however the application submission suggests that none have committed to the proposed scheme and therefore this remains a speculative opportunity.
- 10.18 The economic benefits are tempered, given the speculative nature of the proposals. Officers have significant concerns with the robustness of the submitted evidence for the site selection process, as well as whether there is sufficient justification to demonstrate demand for the Science Park element of the proposal in this location. In addition, there are significant shortcomings with the submitted evidence, such that there is no justification to demonstrate why this employment use could not be delivered on other sites elsewhere within the Borough, whilst still delivering the same economic benefits. The applicant is clear of the benefits of the scheme to a local employer, but there is nothing that compels Wasdell to occupy this site. Indeed, any permission would relate to the land and could be implemented and occupied by any company, meaning that the considerations around retaining a specific local employer have to be seen in that context. The lack of robust evidence and concerns over the speculative nature of the proposed development, in particular the Science Park element, leads Officers to cumulatively attribute moderate weight to the entire economic and social benefits of the proposal.
- 10.19 The Planning Statement (November 2018) and Covering Letter (dated 24th April 2020) outline other benefits and solutions to the proposed development including the delivery of the new roundabout access to the site. This forms part of the Southern Connector Road (SCR) which forms a key part of the strategic transport strategy for the NEV strategic allocation. The SCR, including the proposed

roundabout benefits from full planning permission, and is also fully funded through other means. In the long term, the proposed development envisages additional public transport links to Swindon being provided, however this have not been secured through an appropriate agreement or otherwise and therefore does not constitute a public benefit.

- 10.20 The environmental benefits outlined within the submitted application include the opportunities for improvement and creation of habitats and biodiversity net gain, when compared with the existing site, as well as a SuDS scheme which will not increase the risk of flooding as a result of the proposed development. These primarily form mitigation measures for the proposed scheme. A number of the existing hedgerows and trees would be retained, whilst the provision of new footpaths integrated into the proposed green infrastructure would present opportunities for people to access the land for recreational use. Given there are existing Public Rights of Way (PRoW) across the site, and its users currently benefit from a rural experience, which would be lost as a result of the proposed development; these public benefits cumulatively gain only slight weight.
- 10.21 The scheme proposes some tree planting which would secure some carbon benefits. The design of the proposed development seeks to achieve a standard equivalent to BREAAAM 'excellent', whilst a travel plan and shuttle service would provide some savings in vehicle movements which would assist with reducing carbon emissions. These are all measures which would be welcomed, however overall the proposal is likely to result in an increase in emissions from industrial activity associated with the new development, including a large increase in HGV movements and energy use such as for large amounts of chilled storage. As a result, there may be an overall increase in emissions and Officers have not treated these elements as a public benefit.
- 10.22 As outlined within the Built Heritage Statement (BHS), Landscape Strategy (Feb 2020) and Planning Statement (November 2018) the scheme proposes a number of mitigation measures including the siting of the main entrance and transport infrastructure to the west of the site; buildings heights; additional planting and landscaping including woodland belts to the north and south; and keeping a field to the east of the application free from development as an area of non-coalescence between the proposed development and Wanborough. The proposed submission suggests these would provide a buffer between any built form or any increased activity and as such would reduce the adverse impact on the surrounding heritage assets, landscape character areas and AONB.
- 10.23 The proposed landscaping and woodland belt are substantial in size and would take a long time to fully form. The surrounding landscape is largely open, primarily with small clusters of trees and boundary hedgerows. The scale and nature of the proposed development and associated landscaping, planting and woodland belt is out of character with the surrounding landscape. It would introduce a feeling of enclosure rather than openness when approaching the Upper Wanborough

Conservation Area and negatively affect the existing countryside setting. The scale and siting of the tree planting and landscaping, which are seeking to screen the proposed development, would further restrict the important views and rural experience of the Upper Wanborough Conservation Area, particularly from Pack Hill, The Marsh and Public Rights of Way running through the application site. The cocooning effect from the proposed landscaping would present a barrier to the AONB, preventing any interconnectivity between the AONB and its setting. The loss of these views and rural setting would impact the significance of these assets. Officers therefore consider the proposed mitigation measures would fail to sustain or enhance the significance of the heritage assets and the contribution of their setting, nor protect or enhance the surrounding landscape character or setting to the AONB.

Summary of planning balance

- 10.24 There is an acknowledged need to support the retention of local businesses and boost economic growth in Swindon, which would lead to some economic and social benefits. However, the support for retaining local businesses in Policy EC1 is primarily for those in the town centre and at allocated sites and is subject to compliance with other policies of the Local Plan. The proposed development significantly conflicts with other policies of the plan. In terms of the principle of development, the proposal conflicts with the adopted development strategy for Swindon Borough as set out in Policy SD2 as it proposes a significant development in the countryside on unallocated land within a non-coalescence area, contrary to Policy NC3. Furthermore, the proposed development would result in significant harm in environment terms, in particular to the landscape character, North Wessex Downs AONB and nearby heritage assets, contrary to Policies EN5 and EN10 of the Local Plan. Officers therefore conclude that the proposed development would be a significant departure from the development plan and contrary to the Swindon Borough Local Plan 2026.
- 10.25 In accordance with Paragraph 196 of the NPPF, Officers conclude that even if the economic and social benefits from the proposed Science Park were fully realised, they would not offer sufficient public benefit to outweigh the harm caused to the significance of the heritage assets, in particular Upper Wanborough Conservation Area.
- 10.26 When taking the three dimensions together, the proposed development would not represent a sustainable proposal, and would conflict Paragraph 15 of the NPPF which states “*the planning system should be genuinely plan-led*”. Given the identified harm to designated heritage assets and the North Wessex Downs AONB, Paragraph 11di gives a clear reason for refusing the proposed development. Notwithstanding Paragraph 11di of the NPPF, Officers consider that overall the material considerations that weigh in favour of the proposal are not sufficient to outweigh the clear conflict with both the development plan and the policies within the NPPF when taken as a whole.

11 Conclusion

- 11.1 Officers therefore conclude that the proposed development would fail to preserve the special architectural and historic interest of the listed buildings and the wider character and appearance of the nearby Conservation Areas, which officers are required to have special regard and pay special attention to by the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 11.2 Overall, having applied the tests under Sections 66 and 72 of the Planning Listed Buildings Conservation Areas Act 1990, the Local Plan Policies, the NPPF and any other material considerations, Officers conclude that harm arising from the proposed development would significantly and demonstrably outweigh the public benefits of the scheme, and that the scheme would be contrary to both the development plan and the NPPF when read as a whole. Officers therefore recommend that both the full and outline elements of this application be refused.

12 Recommendation

- 12.1 That full planning permission for 33,507 sqm (GIA) of Use Class B1c (light industrial), with associated access, parking, landscaping and drainage be **REFUSED** for the reasons set out at the end of this report.
- 12.2 That outline permission 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) be **REFUSED** for the reasons set out at the end of this report.

Full Application (Phase 1) - Refusal Reasons

1. Principle of development

The proposed development represents an unsustainable form of development on a greenfield site located within the countryside and would compromise the principle of the non-coalescence area which seeks to protect the character and identity of Wanborough, Bishopstone and Bourton. The proposed development would be outside the defined settlement boundary of Swindon and has not been allocated or put forward for development in the adopted Swindon Borough Local Plan 2026. The proposed development is unsuitable for the proposed development and therefore fails to comply with Policies SD2 and NC3 of the adopted Swindon Borough Local Plan 2026 and National Planning Policy Framework (NPPF).

2. Heritage

The proposed development as a result of its scale, form, design, siting and location on an open parcel of land within the open countryside would result in an incongruous, prominent

form of new development that would have an unacceptable urbanising effect by way of visual intrusion and unacceptable encroachment into the rural landscape setting which results in harm to the setting and context of surrounding designated and non-designated heritage assets. The proposal is therefore, contrary to the duties under S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Swindon Borough Local Plan 2026 Policies EN5 and EN10 and the National Planning Policy Framework (NPPF).

3. Landscape

The proposed development by virtue of its scale, form, design, siting and location would result in the introduction of substantial incongruous built form into the rural countryside. The proposal would be excessively prominent, resulting in the loss of open, rural countryside and harm to the visual amenity of the area. The proposal would therefore fail to provide a scheme which protects, conserves or enhances the character, diversity and local distinctiveness of the existing landscape setting, including the North Wessex Downs AONB. The mitigation proposed would fail to overcome this harm. For these reasons, the development would fail to preserve or enhance the local character of the area and would have an unacceptable adverse impact on the countryside, landscape character and North Wessex Downs Area of Outstanding Natural Beauty (AONB). The development is therefore contrary to Policy EN5 of the Swindon Borough Local Plan 2026 and the National Planning Policy Framework (NPPF).

4. Design

The proposed development by virtue of its location, design, scale and form would fail to provide a high standard of design, particularly with respect to the addressing the principles of context and character, would have negative impact on the character of Upper Wanborough and would fail to integrate itself with the wider strategic and comprehensive masterplanning of the New Eastern Villages, contrary to Policies DE1 and NC3 of the Swindon Borough Local Plan 2026 and National Planning Policy Framework (NPPF).

5. Use Class

The submitted application fails to demonstrate that the proposed development, by virtue of its location, siting, scale, details and potential impact on neighbouring amenity, would fall within the Use Class B1c in accord with The Town and Country Planning (Use Class) Order 1987.

6. Canal

The proposed development by way of its siting, design and layout would prejudice the delivery of the canal, contrary to Policy EN11 of the Swindon Borough Local Plan 2026.

7. Environment Agency

The application fails to demonstrate that the risks of pollution posed by water quality can be safely managed by the proposed development. The application is therefore contrary to Policy EN6 of the Swindon Borough Local Plan 2026 and Paragraph 170 of the National Planning Policy Framework (NPPF).

8. Infrastructure

In the absence of a completed Section 106 Legal Agreement, the application fails to secure the delivery of, or financial contributions towards, the necessary infrastructure required to enable sustainable development and mitigate the direct impact of the proposed development. In addition, the application fails to provide a strategy for the long term sustainable management and maintenance of the green infrastructure provided on site. The application is therefore contrary to Policies IN1, EN1 and EN2 of the adopted Swindon Borough Local Plan 2026 and the National Planning Policy Framework (NPPF).

Outline Application (Phase 2) – Refusal Reasons

1. Principle of development

The proposed development represents an unsustainable form of development on a greenfield site located within the countryside and would compromise the principle of the non-coalescence area which seeks to protect the character and identity of Wanborough, Bishopstone and Bourton. The proposed development would be outside the defined settlement boundary of Swindon and has not been allocated or put forward for development in the adopted Swindon Borough Local Plan 2026. The proposed development is unsuitable for the proposed development and therefore fails to comply with Policies SD2 and NC3 of the adopted Swindon Borough Local Plan 2026 and National Planning Policy Framework (NPPF).

2. Heritage

The proposed development as a result of its scale, form, siting and location on an open parcel of land within the open countryside would result in an incongruous, prominent form of new development that would have an unacceptable urbanising effect by way of visual intrusion and unacceptable encroachment into the rural landscape setting which results in harm to the setting and context of surrounding designated and non-designated heritage assets. The proposal is therefore, contrary to the duties under S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Swindon Borough Local Plan 2026 Policies EN5 and EN10 and the National Planning Policy Framework (NPPF).

3. Landscape

The proposed development by virtue of its scale, form, siting and location would result in the introduction of substantial incongruous built form into the rural countryside. The proposal would be excessively prominent, resulting in the loss of open, rural countryside and harm to the visual amenity of the area. The proposal would therefore fail to provide a scheme which protects, conserves or enhances the character, diversity and local distinctiveness of the existing landscape setting, including the North Wessex Downs AONB. The mitigation proposed would fail to overcome this harm. For these reasons, the development would fail to preserve or enhance the local character of the area and would have an unacceptable adverse impact on the countryside, landscape character and North Wessex Downs Area of Outstanding Natural Beauty (AONB). The development is

therefore contrary to Policy EN5 of the Swindon Borough Local Plan 2026 and the National Planning Policy Framework (NPPF).

4. Design

The proposed development by virtue of its location, siting, scale and form would fail to provide a high standard of design, particularly with respect to the addressing the principles of context and character, would have negative impact on the character of Upper Wanborough and would fail to integrate itself with the wider strategic and comprehensive masterplanning of the New Eastern Villages, contrary to Policies DE1 and NC3 of the Swindon Borough Local Plan 2026 and National Planning Policy Framework (NPPF).

5. Archaeology

The application fails to demonstrate that the archaeological remains will be preserved and conserved. This application is therefore contrary to Policy EN10 of the Swindon Borough Local Plan 2026 and National Planning Policy Framework (NPPF).

6. Canal

The proposed development by way of its siting, design and layout would prejudice the delivery of the canal, contrary to Policy EN11 of the Swindon Borough Local Plan 2026.

7. Use Class

The submitted application fails to demonstrate that the proposed development, by virtue of its location, siting, scale and potential impact on neighbouring amenity, would fall within the Use Classes B1b and B1c in accord with The Town and Country Planning (Use Class) Order 1987.

8. Environment Agency

The application fails to demonstrate that the risks of pollution posed by water quality can be safely managed by the proposed development. The application is therefore contrary to Policy EN6 of the Swindon Borough Local Plan 2026 and Paragraph 170 of the National Planning Policy Framework (NPPF).

9. Transport

The submitted application fails to provide sufficient information to adequately assess the impact of Phase 2 of the proposals on the operational capacity and condition of safety of the local highway network and adjoining strategic road network. This application is therefore contrary to Policy TR2 of the Swindon Borough Local Plan 2026 and the National Planning Policy Framework (NPPF).

10. Environmental Health

The submitted application has failed to provide sufficient information to demonstrate that there will not be an adverse impact on the amenity levels, particularly in terms of air quality, noise and vibration, of the adjacent property (Applegate House). The application

is therefore contrary to Policies DE1 and EN7 of the Swindon Borough Local Plan 2026 and the National Planning Policy Framework (NPPF).

11. Infrastructure Delivery

In the absence of a completed Section 106 Legal Agreement, the application fails to secure the delivery of, or financial contributions towards, the necessary infrastructure required to enable sustainable development and mitigate the direct impact of the proposed development. In addition, the application fails to provide a strategy for the long term sustainable management and maintenance of the green infrastructure provided on site. The application is therefore contrary to Policies IN1, EN1 and EN2 of the Swindon Borough Local Plan 2026 and the National Planning Policy Framework (NPPF).

Informatives

1. This refusal is in respect of the following:

Validated by the Local Planning Authority on 18th December 2018:

- Application Form
- Economic Impact Statement (Nov 2018)
- Employment Land Report (Nov 2018)
- Foul Water and Utilities Statement (Nov 2018)
- Highways Technical Note (Nov 2018)
- Planning Statement (Nov 2018)
- Statement of Community Involvement (Nov 2018)
- Wasdell – Our Economic Impact

Received by the Local Planning Authority on 23rd April 2020:

- Arboricultural Implications Assessment (Feb 2020)
- Swindon Science Park (CAM-SCI) Report (Aug 2019)
- Design and Access Statement (Rev K – Feb 2020)
- Environmental Statement
 - Volume One – Non-Technical Summary
 - Volume Two – Environmental Statement Main Text
 - Volume Three – Environmental Statement Appendices
- Landscape Strategy (Feb 2020)
- Sustainability Statement (Jan 2020)

Plans

- Site Location Plan (P8)
- Phasing Plan (P6)
- Phase 2 Site Plan (Indicative) (P10)
- Parameter Plan Composite (P9)
- Phase 1 Site Plan (P8)
- Wasdell Proposed GF Plan (P11)

- Wasdell Proposed FF Plan (P6)
- Wasdell Proposed Roof Plan (P7)
- Wasdell North Elevation (P5)
- Wasdell South Elevation (P5)
- Wasdell East Elevation (P5)
- Wasdell West Elevation (P5)
- Wasdell Section AA (P5)
- Wasdell Drivers Facilities Building (P2)
- Wasdell Drivers Facilities Elevations (P3)
- Wasdell Cycle and Smoking Shelters (P1)
- Wasdell Gatehouse Elevations (P2)
- Wasdell Pump House (P2)

APPENDIX A (see separate document)
Summary of Representations Received