

*'No to Chippenham Gateway' Group*

Councillor Members of the Strategic Planning Committee  
Wiltshire County Council

22 February 2018

**Re: Planning Application 17/03417/OUT 'Chippenham Gateway' to be considered at the Meeting of the Strategic Planning Committee 28 February**

We would much appreciate you spending a little time to read this letter from the "No to Chippenham Gateway Group" prior to the meeting on 28 February.

1. We are concerned about the adverse impact this proposed development would have for Wiltshire and that the Wiltshire Strategic Planning Committee may be minded to approve it on the basis that it will generate new business rates revenue for the council.
2. The proposed development is not on designated Employment Land, is not within a Principal Settlement, Market Town or Local Service Centre, and does not meet any of the criteria set out in CP34 -

***Extract "Core Policy 34 Additional employment land***

*Proposals for employment development (use classes B1, B2 or B8) will be supported within the Principal Settlements, Market Towns and Local Service Centres, in addition to the employment land allocated in the Core Strategy. These opportunities will need to be in the right location and support the strategy, role and function of the town, as identified in Core Policy 1 (Settlement Strategy) and in any future community-led plans, including neighbourhood plans, where applicable.*

*Outside the Principal Settlements, Market Towns and Local Service Centres, developments will be supported that:*

- i. are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements; or*
- ii. support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification; or*
- iii. are for new and existing rural based businesses within or adjacent to Large and Small Villages; or*
- iv. are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council.*

*Where they:*

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

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

*c. are supported by evidence that they are required to benefit the local economic and social needs and*

*d. would not undermine the delivery of strategic employment allocations and*

*e. are supported by adequate infrastructure.”*

3. Development on the proposed site, 79 acres of greenfield land, would be in clear breach of several Wiltshire Core Policies, most particularly CP34 (noted above). The 2016 Core Strategy does not have this land marked as employment land and there is no evidence to date that there is any sustainable economic demand for B8 warehousing at Junction 17.

4. The report to the SPC on this application by the Case Officer published on 19 February, 2018 clearly refers to B8 warehousing as not being part of the Swindon & Wiltshire Economic Plan: He writes: “In this context [expressions of interest in the site for B8 warehouses] it is also noteworthy that the initial inputs from the Council’s Economic Land Review, which is currently being undertaken by consultants to inform preparation of the Wiltshire Core Strategy Review, does acknowledge the development potential of locations at Jct 17 M4, particularly in **high value sectors of strategic importance to Wiltshire** [our emphasis] as set out in the Swindon & Wiltshire Economic Plan including advanced manufacturing, business services, biosciences, digital security, environmental technologies, food & drink, health, ICT and life sciences. Possibly also Artificial Intelligence & Data, Clean Growth, Mobility, Ageing, R&D, electric vehicles, life sciences and construction. **This does not include the B8 Storage & Distribution Sector which is the subject of the application....**” [continues with historic economic growth, and potential for economic growth at Jct 17]

1 million sq. ft. of B8 warehousing at Jct 17 is not of strategic importance to Wiltshire and therefore does not meet the requirements of Core Policy 34

5. Chippenham Gateway would be a new unproven site as a logistics location. Is it sustainable? The demand for B8 space in the UK as a whole, and more specifically in the South West, has reduced significantly in 2017.

*“Take up of large industrial units continues to fall in Q3 2017. Take-up of 100,000 sq. ft plus industrial units has fallen sharply this year – slumping in the 3<sup>rd</sup> quarter to 23.6% below the 10-year quarterly average, reveals the latest BNP Paribas Real Estate industrial and logistics review....Development is predominantly focused on already established logistics parks, with little appetite for taking on development risk in new locations.” Property Weekly, 24 Nov 2017.*

*“At the nationwide level, take-up has reached 24.46m sq. ft for the year to date [2017], a fall of 12.85msq ft [49%] on 2016 but 2% higher than the 10 year average.....Supply of warehousing in the UK currently stands at 28.63m sq. ft, has risen 3.2m sq. ft...4.4m sq. ft of space is currently under construction and due for delivery in 2018...Non property factors are rising up the priority list for occupiers’ locational decisions, in particular the availability of labour and energy” [Savills Big Shed Briefing January 2018]*

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*"South West. Take-up reached 1.5m sq. ft across the South West in 2017 which represented a 65% fall from 2016 and a 13% decrease from the long-term average....Available supply totalled 1.4m sq. ft in 2107 which represents 283% increase from year end 2016..."[Savills Big Shed Briefing January 2018]*

Considerable doubt must arise about whether a new logistics location at Chippenham Gateway, competing with well-established clusters in Swindon, Bristol and Avonmouth is sustainable in the long term.

5. There is no shortage of speculatively built vacant space in the region, evidenced by Symmetry Park in Swindon granted planning consent 5 years ago and still vacant, and also the substantial developments in Bristol and Avonmouth (including St Modwen's own Unit 18 development in its 11<sup>th</sup> year since planning approval). The main retailers and 3<sup>rd</sup> party logistics providers have now secured sites in the established areas of logistics operations notably Bristol, Swindon and Avonmouth; there is no evidence of demand for Chippenham to become a site for logistics operations.

6. Per the Case Officer's report, St Modwen and Savills claim to have significant expressions of interest in the site from 17 operators or their representatives. The Case Officer writes:

"Similarly, it is considered that the details provided to date as to the marketing of the site do demonstrate a significant level of interest and demand for this form of development in this location". He goes on to say that WCC officers have had one meeting with one proposed occupier, and the applicant's marketing outputs identify significant expressions of interest in the site from 17 operators or their representatives.

This information should be made publicly available. **It would be a travesty of the democratic planning and consultation process if the decision on this application was based on secret information known only to a few** (and probably not even all the councillors).

While the planning authority is not going to second guess the commercial judgement of the developers, it is entitled to be assured that there is real and not just perceived demand for the site, or marketing hype. How much research have they been able to do? Who are these companies who have expressed an interest? Have they disclosed their name or is it a case of "we represent a leading international/national/logistics/retailer/manufacturing company"? What work has been done to assess the strategic credibility of their plans to take space at the site? Which other sites are they looking at? Do they have the financial resources? Do they want to buy or lease, and how long? Will they operate a labour-intensive facility, or one that is highly automated? Are they genuine users or just investors? In short, has there been provided to Wilts CC a thorough assessment of the quality of these expressions of interest?

6. The Gross Value Added claimed for the Chippenham Gateway development has been grossly exaggerated. A study of the GVA of Wincanton Group plc, the leading local and one of the UK's largest and most successful logistics operators, shows annual GVA per employee of £34,500, some 26% below the projected £46,749 GVA

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per employee claimed by St Modwen and their advisers (see letter Edward Buchan to Lee Burman Wiltshire CC 4 October 2017. A further study in December 2017 of the market leader DHL in 2016 (DHL Supply Chain & DHL Services) showed an annual GVA per employee of £36,400). This fact is substantiated by an independent review of our figures by the Department of Accounting Economics and Finance, Bristol Business School of the University of the West of England. They say "The applicant's calculations are optimistic in terms of local employment creation and very optimistic in terms of GVA per job. Given the economic outlook and the healthy supply of logistic space in better locations, it is difficult to see a persuasive local economic case for the proposed development". Furthermore, preliminary findings from their own research has found that "the economic case for developments of this type is much weaker than in the past".

6. It is also clear that the majority of jobs that may be created will be seasonal or zero-hour contracts paying minimum wages for unskilled work. Furthermore, it will not significantly reduce the level of out commuting and will increase the level of in commuting, as evidenced by the latest job seekers data for Chippenham. We believe that Wiltshire should be providing more appropriate or aspirational work and career opportunities for school leavers from Chippenham & Malmesbury, the type of job opportunities for example that James Dyson is proposing at Hullavington, which is in stark contrast to this proposal.

7. The scale of the proposed development is such that approving it would, in effect, pre-judge the employment land demand and prejudice future allocations for all areas of Wiltshire. This point is pertinent bearing in mind that the next phase of the Strategic Plan is commencing with the Swindon and Wiltshire Joint Spatial Framework Issues Paper of November 2017. The purpose of following a plan-led system is to marry economic development, demand and land allocations to best effect and to prevent sectors of the county being short changed or undermined.

8. We also have serious concerns specific to this site about the increased risk flooding downstream in Sutton Benger, which has a history of flooding. (Wiltshire Council and SBPC have already invested heavily in mitigating measures to cope with the present known flood risk.) No real assessment has been made of this issue. Covering 70 acres of agricultural land with buildings and hard standing will lead to the flooding of the small watercourse, Bushes Leaze, which drains the site, and the Draycot Cerne/Sutton Benger brook downstream.

9. The impact on the traffic situation on the B4122 and Junction 17 also raises serious concerns. A recent week-long survey by residents showed that traffic was already at levels projected by the developers for 2019, and all this before adding the increased traffic from Birds Marsh View and other housing developments in Chippenham, not to mention the additional traffic from Dyson's planned development at Hullavington.

10. Other concerns about the development include the impact on groundwater, ancient trees and hedgerows, footpaths and its stark visual intrusion. It is a monolithic brutal development that is totally out of scale with the immediate environment and which would be visible from miles around, including from the National Trust chalk down lands to the South East (contrary to CP34 subsection iv b).

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11. To date letters of objection from over 400 local residents (many more if you include members of their families) have been lodged and the development has been opposed by all 9 neighbouring Parish Councils and the Parish Forum. The development has utterly minimal local support, contrary to the developer's claim. If it is approved, it will inevitably invite legal challenges as it would run so clearly against core policies.

12. The preferable way to proceed is not to commit to an opportunistic development of this nature but to complete a strategic, overarching review of employment land in Wiltshire, as per the Councillors' Briefing Note 331, paragraph 3, of September 2017, which includes Junction 17. The plan led process of working through the Swindon and Wiltshire Joint Spatial Framework is the effective way to assess future employment land allocation and employment type; following it will avoid premature assumptions being made with the potential to blight and despoil open countryside permanently. We want to make sure the right thing is done for our future generations.

We urge you to refuse permission for this planning application.

Yours sincerely,

On behalf of the 'No to Chippenham Gateway' Group.

Phil Jones (Chairman)

Edward & Fiona Buchan

Bill Ford

Elma & Alan Lawer

and many others

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