

Chippenham Gateway. Planning Application to Wiltshire Council

17/03417/FUL

From: Edward Buchan, South Sea Farm, Kington Langley, Chippenham SN15 5PB

Dear Sir/Madam

1. I am writing to OBJECT to the above planning application made by St Modwen Properties Plc trading as St Modwen Developments.
2. We live at South Sea Farm which is one of the closest of the neighbouring properties to the proposed development, approximately 400 metres from the site boundary. South Sea Farm is listed Grade 2. The development will be fully visible from our house and garden.
3. I was a director (1996-2005) of a leading international logistics group, Tibbett & Britten Group Plc (now part of Deutsche Post/DHL) and we managed a lot of large, very large and gigantic warehouses in the UK, Canada, USA, Germany and other countries around the world for customers which included Walmart, Safeway, B&Q, M&S, Sainsbury, Unilever, Procter & Gamble. I have detailed knowledge of the logistics sector.
4. My reasons for my Objection to the proposed development are:

A. It is outside the Wiltshire Core Strategy, is on greenfield land not designated as Employment Land or Additional Employment Land and does not meet the criteria set out in Core Policy 34 (Additional Employment Land)

- The proposed development is outside the core strategy. Land at Junction 17 has not been designated Employment Land or Additional Employment Land. Chippenham Gateway does not meet the requirements of Core Policy 34 for Additional Employment Land because:
- It is not essential to the wider strategic interest of the economic development of Wiltshire, does not meet sustainable economic development objectives and is not consistent in scale with its location
- A planning application has recently been submitted by Dyson for a major technology campus development at Hullavington Airfield. Wiltshire Council should adopt a wide ranging review of the employment land in North Wiltshire in the light of this (it was last done in 2011), and this should encompass Junction 17. This St Modwen application should be looked at as part of the whole plan for the area, and not piecemeal.

B. It is of a size totally out of scale its location, will be visually intrusive to be a very large number of people both in the immediate surroundings of Kington Langley, Draycot Cerne, Sutton Benger and Stanton St Quintin but also from viewpoints from higher land across the county. It does not meet the criteria set out in Core Policy 51 (Landscape) Core Policy 50 (Biodiversity) or Core Policy 57 (Ensuring high quality design and place shaping)

- The scale of the principal warehouse Unit A at 775,000 sq.ft. and 23 m (75 feet) high is totally out of keeping with the landscape. It will dominate the landscape. The area it covers would fit the Twickenham rugby pitch 7 times. It would be 3 telegraph poles one top of the other high. You could get Bristol Cathedral into it 50 times. Its massive size in a landscape of gently undulating arable and pasture farmland will be brutal.
- It will be visible to a very large number of people both close to the site and in the nearby villages, and from high points with outstanding views, like Bremhill.

- The question of light pollution is not addressed in the planning documents. This could be severe as many logistics distribution hubs work extensive cross-docking operations at night (loading direct from inbound truck to dock, sorted on the dock, loaded to outbound truck) loading trucks for store delivery in the early morning.
- The proposed development would entail the loss of significant stretches of ancient hedgerows, trees and loss of habitat for owls and bats.

C. The proposed development is not economically justified. After a year of marketing, there is no announced end-user(s) for the facilities and as a speculative warehouse development it will currently be the largest in the UK. It relies totally on access to the M4 for its rationale; it is a secondary commercial property unlikely in its proposed gigantic form to be viable

- This is an opportunistic application by St Modwen of a greenfield site close to a motorway junction. There is no announced end user (tenant or buyer) and so it is a speculative development lacking in substance as we do not know who or what will use the facilities.
- Chippenham Gateway would be currently the largest speculative warehouse development in the United Kingdom. (source: Tritax Big Box Reit Plc, prospectus dated 24 April, 2017 Part 3 Section 8.1 Chart 3, CBRE, Q4 2016 www.tritaxbigbox.co.uk/investors ; *Logistics Manager* 7 April, 2017)
- There is no firm evidence of demand for these warehouse facilities on the scale proposed. The closest similar development, at Symmetry Park off the A420 at Swindon is not let or built yet (source www.dbsymmetry.com; *Logistics Manager* 27 April 2017) and Swindon is a far more established location for large distribution warehouses than Chippenham, and it is being marketed by Savills in competition with Chippenham Gateway.
- Would Chippenham Gateway even be viable? The reason most large warehouse developments in the Primary Market Area (note: the term used by St Modwen to cover the area bounded by Bridgwater in the South-West, Reading in the East and Tewkesbury in the North) have clustered at Bristol, Avonmouth, Swindon, Reading and Gloucester is because that is where the end-users want to be. There is more to locating large logistics hubs than just finding a spare site on a motorway junction. Closeness to major population centres for labour, good public transport and other infrastructure, and proximity to pallet network depots, last mile carriers, customers and suppliers are all very important.

D. It will not reduce labour out-commuting, an aim of the WCS. The pool of job-seekers in Chippenham and its surrounding villages is not large enough to supply the staff required; they will need to come from over a large area which will increase the amount of in-commuting without any reduction in out-commuting

- Without knowing who the end user will be and therefore the type of logistics operation – e.g. e-fulfilment provider, retailer regional distribution centre, manufacturer national distribution centre- it is impossible to comment. The estimates of employment submitted by Savills, a very precise 689 net new jobs, is largely computed by crudely applying a theoretical density figure of 1 employee for every 86 sq.m. of concrete floor.
- A new logistics development on this scale will, unless it is a highly automated facility, have to source labour from a large area of Wiltshire/

Gloucestershire/Bristol & Swindon. This will not reduce the level of out-commuting, but it will increase the level of in-commuting. If the end user is largely an e-commerce fulfilment operation the labour is likely to be highly seasonal, with warehouse staff doing order fulfilment on flexible or zero hours contracts and paid the minimum wage. A lot of this labour will inevitably be migrant. Does Wiltshire want to create large amounts of low value employment which actually creates problems for the local communities (housing, schools, transport etc.) or high value jobs such as those provided by Dyson in his planned engineering centre at Hullavington Airfield?

E. It will lead to an increased risk of flooding to Draycot Cerne and Sutton Benger, potentially very serious

- Because the development is so huge, there is a risk of flooding downstream of the site. The land on which it would be built is largely impermeable clay and brash, so very slow water infiltration in a storm or after a wet period. A flash storm (like in London on 23 June, 2016 when 44mm of rain fell in 6 hours) could overwhelm the flood defences as water would be coming off the roof of Unit A at a rate of 150 litres per second! The capacity of the bushes Leaze is limited to 54.3 litres per second.
- What could happen in the worst case? If the reserve storage (SuDS, sustainable drainage system, and attenuation pond) and swale are already well filled this amount of rainfall run-off from the main Unit A, together with water draining from Units D & E, the hardstanding, the A350 and B4122, will flood the Bushes Leaze. The water will then join the Draycot Brook, which is the main drain for the A350 and rises very quickly, and combined will flood the B4122 at the western end of Draycot Park. It will then flood the picturesque lake in Draycot Park which was not designed as an attenuation pond and has a silting problems, overflow its impoundment and, now black and swollen with agitated silt, proceed to flood houses in Sutton Benger (where there is a history of flooding where the stream goes under the Seagry Road) before finally joining the Avon east of the village. What can happen, will happen.

F. The proposed development raise major issues of traffic problems both at Jct 17 and on the B4122; The Transport Assessment shows capacity exceeded at peak times and a staggering daily total of 3,437 HGV, van and car trips.

- From the report submitted with the planning application there are clearly unresolved issues and much debate between St Modwen's advisers and Highways England's advisers over the assumptions and the methodology to use. HE should ask for a deferral of this application.
- At peak times there are forecast to be 269 vehicle movements in the AM peak and 334 in the PM peak and 3,437 vehicle movements a day. At peak times the A 429 southbound, M4 Eastbound slip road, and the A350 northbound will all be over capacity at Jct 17 i.e. queues. The B4122 will also be close to capacity.
- There is no evidence that the traffic studies have included provision for increased traffic on the A429/Jct 17 from the development at Hullavington or people using the waste recycling centre which is heavily used with queues down the B4122 on the few days it is open.

- The B4122 is a small road and there is a serious safety risk with the increased traffic as it already carries a lot of car and HGV traffic from Chippenham.
- The traffic plan does not address environmental sustainability. The site is remote from the population centres which means a very low level of pedestrian and cycle use by employees.

Lastly I would like to object to the approach adopted by St Modwen and Savills to the public consultation. We received a letter dated 6th September, 2016 on 7th September informing us of the consultation on 8th September. What sort of notice is that? And that was the only consultation notice we have received from anybody, and we live next door to the proposed development.

Yours faithfully

Edward Buchan