

	Online Comments
Application No	17/03417/OUT
Comments:	<p>I strongly object to the proposed development on various grounds, as set out below.</p> <p>1 This is a speculative development</p> <p>No occupier has been identified as is clear from the different site plans put forward. According to this website https://propertylink.estatesgazette.com/warehouse-for-rent/swindon (accessed today), there are:</p> <p>1. 6 industrial sites for rent that are greater than 100000 sq ft, including the site at Symmetry Park on the A420 being offered by the same agents on a speculative basis with up to 1 million sq ft</p> <ul style="list-style-type: none"> - There are a further 7, each with between 50000 sq ft and 100000 sq ft of space - Another 10, each with between 25000 sq ft and 50000 sq ft - There are nearly as many smaller units available <p>This underlies the speculative nature of the application.</p> <p>This means that there is no certainty of the type of occupier(s) that their mode of operation. The nature of warehouse and distribution centres can vary by the products held. John Lewis is often cited as a good retailer and employer. It currently has three warehouses on one site at Milton Keynes each handling different types of product (see the video in http://jlpjobs.com/partnership-jobs/john-lewis/john-lewis-jobs/distribution/warehouse/). It is clear that the different John Lewis products and distribution channels impacts on the design of the three buildings. The overall site covers 2 million sq ft, and employs about 2000 people. According to the directions provided by John Lewis, on its own admission J13 of the M1 can be “very congested”.</p> <p>2 Employment</p> <p>In Section 19 of the application, the applicant states that there will be 1081 full time equivalent employees. Again this is speculative. The Range planning application (off the A350) initially quoted 1000 jobs, but this was reduced to 350 with no certainty of jobs for local people or extensive commuting. The John Lewis website (see above) lists this type of employment:</p> <p>Warehouse Assistants</p> <p>Managers</p> <p>Support roles</p> <p>Planners</p>

Vehicle Technicians and Maintenance Teams

The planned development by Dyson at Hullavington offers a wider diversity of skills for employment in an area where there is already low unemployment.

3 Traffic and road infrastructure

First I note the objection by Highways England requesting a delay of three months to obtain more facts. An issue that I have with the traffic projections by Highways England is that their model suggests 600 traffic movements a day, with assumptions of peak AM and PM traffic loading. But this does not align with over one thousand employees and their journey to work times, and whether the warehouses will operate 24/7 or less. Nor does it take into account the nature of movements in and out of the warehouse(s) based on the products held, the length of time held, and the outbound distribution channels. There is no data on the types of vehicle. I make these statements after working for a major retail-distribution organisation and consulting on the subject. The current mantra is “optimised transportation and proximity to customer”. The John Lewis complex has 46 million people with a 4.5 hour distance. Their operation is effectively close to the centre of gravity for UK distribution. Wiltshire and surrounding counties do not support an extensive population base.

Putting aside all the estimate of traffic, there is already some baseline information that needs to be input into any traffic model. I am only referring to traffic south of J17, but am aware of problems on the north side too. Traffic already queues on the A350 at peak morning times and also on the B4122. The impact of problems on the A350 is that more drivers from the Chippenham area are either diverting through Kington Langley or using the B4039 to the junction of the B4122 to get to Junction 17. It can take a quarter of an hour to join the motorway or cross to go north on the A429. The B4122 also has significant commercial vehicle traffic, some going to the Pit Stop service but also to industrial estates in north Chippenham. Add to this, residents from north Wiltshire visiting the recycling centre, which is almost opposite the proposed development. It is no wonder that there are “queues likely” signs on both sides of the B4122 before the recycling centre.

4 Flood risks

In Section 12 of the application, the applicant answered “NO” this question “Will the proposal increase the flood risk elsewhere?” This question cannot be answered with such certainty given the area to be covered with concrete. The flood risks to Sutton Benger Parish need to be properly assessed. In recent years the brook crossing the B4122 has flooded. In turn Seagry Road (about a mile east) has also flooded a number of homes. When the chicken factory was turned into the housing development known as The Park, the developers made provision for excessive rainwater to be collected into ponds and in dry weather be released into Seagry Brook which flows into the River Avon. The developers of The Park made no provisions for additional potential flooding upstream.

5 The environmental impact

The current site is pasture fields with undulating contours. The proposed development will need to be flat. Depending on the type of warehouse, internal

flooring will need to be precisely level (e.g. to accommodate robotic trucks or high bay cranes). Much will depend on the nature of the unknown use of the speculative warehouse(s). Some internal storage rack structure can be accessed by cranes up to 45 metres high. Such a warehouse would certainly be a blot on the landscape. In contrast other warehouses can only be twice the height of an HGV. It is all dependent on the use that is required.

Even a relatively low building will still need to be screen from the road and surrounding field in what is essentially a rural setting.

In section 23 under Hazardous Substances, the applicant stated “NO” to the question “Is any hazardous waste involved in the proposal?” Again an answer that cannot be verified.

6 Wiltshire Council’s own Strategic Core Policy 34

This development appears to be counter to the bar on green field sites. Certainly the level of employment is so uncertain, compared to the proposals by Dyson only a few miles north, will not be essential to Wiltshire’s development. As I have said in Section 1 of my objection, there is almost a glut of spare warehouse capacity with a few miles in Swindon, which is slightly better served with dual carriageway access to the M5 and north as well as the M4.

Before any development can take place, based on my objections above, the developers and / or planners need to:

1. Defer any development until a a warehouse plan is put forward by the organisation planning to operate the entire site or part of the site.
2. In turn this will provide a realist requirement for the number of people employed and the skill levels required. At present the 1081 FTE from the application does not square up with the traffic projections form Highways England. In addition, more and more warehouse functions are either being automated or semi-automated. While this reduces the skill sets required for ‘operators’ it increases the skill required for maintenance to support 24/7 operation. The Dyson development will absorb all the local skilled engineers and more.
3. Traffic assessments need to be based on all the inflows to and from J17 from all directions. This includes the fact that the already increased traffic at the junction of the B4069, B4122 and the road to Draycot Cerne. Additionally serious consideration needs to be given to the traffic during the development process. The traffic chaos by the Symmetry Park development on the A420 (same agent) i a classic example of getting it wrong. Therefore all the B4122 need to be considered as part of a comprehensive solution. Just solving the entry and exit to the proposed development site is not only short-sighted, but potentially dangerous.
4. Flood risks need to take account of the impact on Draycot Cerne, the listed historic church in the Draycot estate, flooding on the south side of the brook through all of Sutton Benger until the brook flows into the River Avon.
5. A lot more input is required to justify the environmental impact.
6. Not only does this application need to meet the Core strategy, but given that

	<p>Wiltshire Council is politically constant for the next few years, a comprehensive strategy needs to be in place to consider the projected impact of large scale housing developments in an around Chippenham, Taking account of the developments at Hullavington too. The residents deserve a strategy, not piecemeal developments.</p>
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Date:	12/05/2017