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3rd March 2023

Dear Sir/Madam,

## **WEST BERKSHIRE LOCAL PLAN REVIEW REGULATION 19 CONSULTATION – REPRESENTATIONS ON BEHALF OF TRINITY GRAIN LIMITED**

On behalf of our client, Trinity Grain Limited ('Trinity Grain'), we are instructed to submit the following representations to West Berkshire Council ('the Council') in response to its Regulation 19 consultation on the emerging West Berkshire Local Plan Review ('LPR').

Trinity Grain is the sole landowner of 'Land to the south of Trinity Grain, Membury Industrial Estate' (hereafter 'the Site'). The Site extends to approximately 2.2 ha and lies immediately to the south of Membury Industrial Estate, a Principal Employment Area within the adopted Development Plan. A Site Location Plan demonstrating extent of land ownership is included at Appendix 1.

Within the HELAA (Appendix 4, Stage 2c), the entry for LAM10 (the Site) concludes firstly that there is 1 land owner and then goes on to write in the 'Comments' column that the site is in multiple ownerships. To clarify, the site is owned entirely by Trinity Grain Limited, and they are acting as promoters and developers. Therefore, there are no availability issues pertaining to the site.

Trinity Grain promoted the Site for employment development (specifically, office and/or storage and distribution uses) during a Call for Sites exercise run by the Council in December 2021. The LPR proposes allocation of the Site for employment development via Draft Policy ESA3, subject to defined parameters, including the provision of approximately 5,200sqm of B2 and/or E[g][iii] uses. An extract of Draft Policy ESA3 is shown at Appendix 2. The Site is also proposed to form part of an enlarged Designated Employment Area (DEA) covering the Membury Industrial Estate, development within which will be subject to the provisions of Draft Policy DM32.

While Trinity Grain supports the Council's decision to allocate the Site for employment development, it does not consider that restricting potential uses to B2 and E[g][iii] (and excluding B8 uses) can be considered 'sound' with regard to the tests outlined at Paragraph 35 of the NPPF for several reasons outlined below.

Please note, as requested by the Council, the contents of this document have been used to fill out the Representation Form, which is included at Appendix 3.

## Draft Allocation Parameters Overview

This section assesses the sites potential against the proposed draft allocation parameters and provides Trinity Grain’s view on the parameters.

Policy ESA3: Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)

a	<i>The provision of approximately 5,200 square metres of employment floorspace for B2 and/or E(g)(iii) across the site;</i>	This should not refer to floorspace, as it precludes the option for open storage uses, or this should refer to a upper limit, or flexibility should be appropriately weaved in to the wording.
b	<i>Access to the site will be provided from Ramsbury Road;</i>	<p>The access point indicated on the plan that supports the policy text demonstrates access through the existing Trinity Grain, grain processing site. This is an operational commercial site and it would not be possible for access to be made through here.</p> <p>It would result in both access and safety issues through conflicts with domestic vehicles and HGVs. It would also mean that access to the draft allocation site could only be during opening hours of the Trinity Grain site.</p> <p>Access from Ramsbury Road, should be taken from the southern portion of the site, along the internal access road, travelling north and entering the site just below the silos.</p> <p>This will allow the site, once developed, to operate independently of Trinity Grain and fulfil its function as independent employment site.</p>
c	<i>Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment will be required;</i>	Agree.
d	<i>Measures will be included to improve accessibility by, and encourage use of, non-car transport modes. These measures will be set out in a Travel Plan;</i>	Agree.
e. i. & ii.	<i>The scheme will be developed in accordance with the Landscape Sensitivity and Capacity Assessment (2022) for the Site, and will include the following measures:</i>	Allowing for B8 use on the site does not preclude the scheme from being developed in accordance with the <i>Landscape Sensitivity and Capacity Assessment (2022)</i> . The

	<p><i>Retain the tree belt/hedgerow along the eastern site boundary and the woodland copse within the southern part of the site; and</i></p> <p><i>Buildings should be at a height where they are not visible above the adjacent silo towers and the tree canopy (within the southern part of the site) from the wider landscape to the south and from the Ramsbury Road;</i></p>	<p>existing landscaping and tree belts can be retained and enhanced.</p> <p>Buildings for B8 use, or development for open storage could feasibly be developed to sit below the height of the adjacent silo towers and the tree canopy.</p>
f	<p><i>The development design and layout will be in accordance with Policy SP7 and be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA);</i></p>	<p>Agree.</p>
g	<p><i>Development will be informed by a Heritage Impact Assessment (HIA);</i></p>	<p>The draft allocation site does not comprise any heritage assets. The nearest assets are:</p> <ul style="list-style-type: none"> <li>• 650m south: Lyckweed farmhouse Grade: II 1312987</li> <li>• 800m southwest: Gate piers to Membury House Grade: II 1034099</li> <li>• 875m west: Membury Camp Scheduled Monument 1003818 / 1002994</li> <li>• 1050m southeast: Barn to south west of Leigh farmhouse Grade: II 1136054</li> <li>• 1050m southeast: Barn to east of Leigh farmhouse Grade: II 1321844</li> </ul> <p>There are also several assets north of the M4 Motorway, these are limited to farm houses, public houses, country houses and cottages.</p> <p>A heritage impact assessment is only required for <b>an application that directly affects a heritage asset or its setting.</b></p> <p>Given the nature of the assets in proximity of the site, and the distance between the site and the assets, as well as the other design parameters in this draft policy (i.e., the requirement for the proposed height to be lower than the adjacent silos), it is not conceivable that the setting of those assets would be affected by the proposal.</p>

		<p>Therefore, a Heritage Impact Assessment is not required for development on the site and should be removed as a parameter.</p> <p>The HELAA assessment refers to heritage potential on the site and surroundings. It notes that: <i>development of the site would not lead to harm to or loss of significance to any designated heritage asset.</i></p> <p>It also states that with regard to undesignated assets, there is possibly some Second World War structures and below ground features resulting in archaeological potential and that further information is required regarding the military background.</p> <p>The site is devoid of any historic structures (above ground). Whilst we believe Archaeological potential is unlikely, a DBA can be provided in support of any planning application to evidence this.</p>
h	<i>Development will be informed by a Flood Risk Assessment, which will include appropriate flood mitigation measures, including SuDS;</i>	This would be provided in support of any future planning application.
i	<i>Development will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected; and</i>	This would be provided in support of any future planning application.
j	<i>The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with Policy SP5.</i>	This would be demonstrated in support of any future planning application.

### Pre-application enquiry

Earlier in 2023, on behalf of Trinity Grain, Carter Jonas submitted a pre-application enquiry for B8 (open storage) use for the site.

The pre-application enquiry included the following information:

- Preliminary Ecological Appraisal;
- Preliminary Landscape Visual Appraisal;
- Landscape Strategy;

- Transport Scoping Note;
- Planning Statement; and
- Site Layout.

The response from the LPA has not yet been received. However, it is evident from the pre-application investigations that B8 can conceivably be delivered on the site.

The pre-application package has been appended to these representations (appendix 4).

### Suitability for B8 uses

Primarily, it is not clear why Draft Policy ESA3 de facto excludes B8 uses. As confirmed by paragraph 7.8 of the LPR, the Employment Land Review (ELR) (2020; 2022 Addendum) recommends a minimum **industrial land** requirement of 91,109sqm, or 23 ha of land, to 2039 to meet identified needs. The 'industrial land' requirement is the sum totalled requirement for B2, E[g][iii] (formerly B1[c]) **and** B8 uses.

The 2020 ELR (paragraph 4.72) recognises that *“these uses generally occupy the same types of building, are generally inter-changeable and are difficult to distinguish in practice”* with the exception of strategic-level warehousing under B8. This, in part, explains the appropriateness of identifying a collective industrial land requirement, rather than specific requirements for general industry, storage, distribution etc.

In lieu of the above, there is no sound justification as to why B8 uses would not be suitable. The only loose justification appears to be offered in the Employment Background Paper at paragraph 54:

*“LAM10, land to the south of Trinity Grain, is located adjacent to the existing Membury Industrial Estate, and proposed to be allocated for B2 and Eg(iii) uses. Such uses are considered appropriate given the size of the site and relationship with the surrounding uses”.*

Turning first to its relationship to surrounding uses, Membury Industrial Estate as an established employment site that provides B2 and B8 uses (including open storage), both currently and as proposed to be allocated in the LPR. Accordingly, there is no reason why the site should be precluded from being allocated for B8 uses by nature of its relationship with the surrounding uses.

In terms of size, it should be recognised that the B8 Use Class is broader than logistical and housed warehouse storage and can include other storage solutions, such as open storage. This part of the B8 use class is more akin to the collective industrial site typology, as outlined above.

The identification of the Site's development potential has been informed by a variety of background studies, including the HELAA and Landscape Sensitivity and Capacity Assessments, which take account of constraints (such as its location within an AONB). The results of these assessments have been carried forward into parameter constraints in Draft Policy ESA3, which govern suitable quantum (not uses) of development, including retaining the existing tree belt/hedgerow along the eastern and southern boundaries and controls to the height of “buildings”.

However, Trinity Grain argues these controls would remain relevant to any proposed B8 use, including if no specific buildings with floorspace were provided in the case of open storage. For example, with such use, restricting development to the central part of the site, retaining the landscape buffer and restricting heights to the level of the grain silo towers in buildings and structures could be maintained. This has been evidenced by the Site Layout Plan submitted with the pre-application enquiry.

Trinity Grain, therefore, considers the de facto exclusion of B8 uses for the Site from Draft Policy ESA3 has not been justified, despite its promotion for such uses to the Call for Sites. Moreover, a B8 use can be considered suitable within the established parameter constraints.

## Flexibility: Mitigating the shortfall

As detailed in Table 3 of the Employment Background Paper (2023), the LPR is inclusive of site allocations to provide only 58,400sqm of floorspace, or 16.6ha land. Accordingly, there will be a shortfall of 32,709sqm (or 5.4 ha of land) which the Council has stated cannot be met by neighbouring authorities.

In lieu of any identified shortfall, Trinity Grain considers there is an opportunity for the Council to be proactive and flexible with its employment land allocations to meet market demand. Paragraph 81 of the NPPF confirms planning policies should help create the conditions in which businesses can invest, expand and adapt. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. Paragraph 82 adds that policies should (inter alia): be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.

Accordingly, the allowance for B8 uses to Draft Policy ESA3 would result in policy strategy and allocation that could enable rapid response to requirements for industrial land more generally.

## Conflict with the DEA

Finally, as currently drafted, the exclusion of B8 uses would be at odds with the provisions of Draft Policy DM32, which supports the redevelopment and regeneration of land within DEAs to provide business uses – including office, industry, storage and distribution.

Accordingly, Draft Policy DM32 would not preclude the site from being redeveloped for B8 purposes in the future. As set out above, there is no sound justification for not allowing the allocation of this site for B8 purposes. This, therefore, does not represent an effective strategy or allocation. A simple solution would be to adopt flexibility up front to ensure the right use is delivered to meet market requirements whilst being subject to appropriate site-specific parameter constraints detailed in Draft Policy ESA3.

## **Conclusion and Next Steps**

In summary, Trinity Grain considers parts of the LPR as currently drafted as unsound.

Draft Policy ESA3, in restricting potential uses to B2 and E[g][iii] on the Site and de facto excluding B8 uses, is neither justified, effective or consistent with national policy. Trinity Grain recommends that the Council also allocate the Site for B8 uses, allowing greater flexibility in delivering its industrial land requirements and maintaining the importance of DEAs. This is a simple change, that would also allow the Council to maintain its defined parameter constraints for this Site (save for the recommendations made in this response).

We trust that these representations clearly sets out Trinity Grain's concerns and that these will be addressed prior to submission of the LPR to the Secretary of State for Examination.

We would appreciate it if our client could be kept informed of updates to the LPR programme as it progresses.

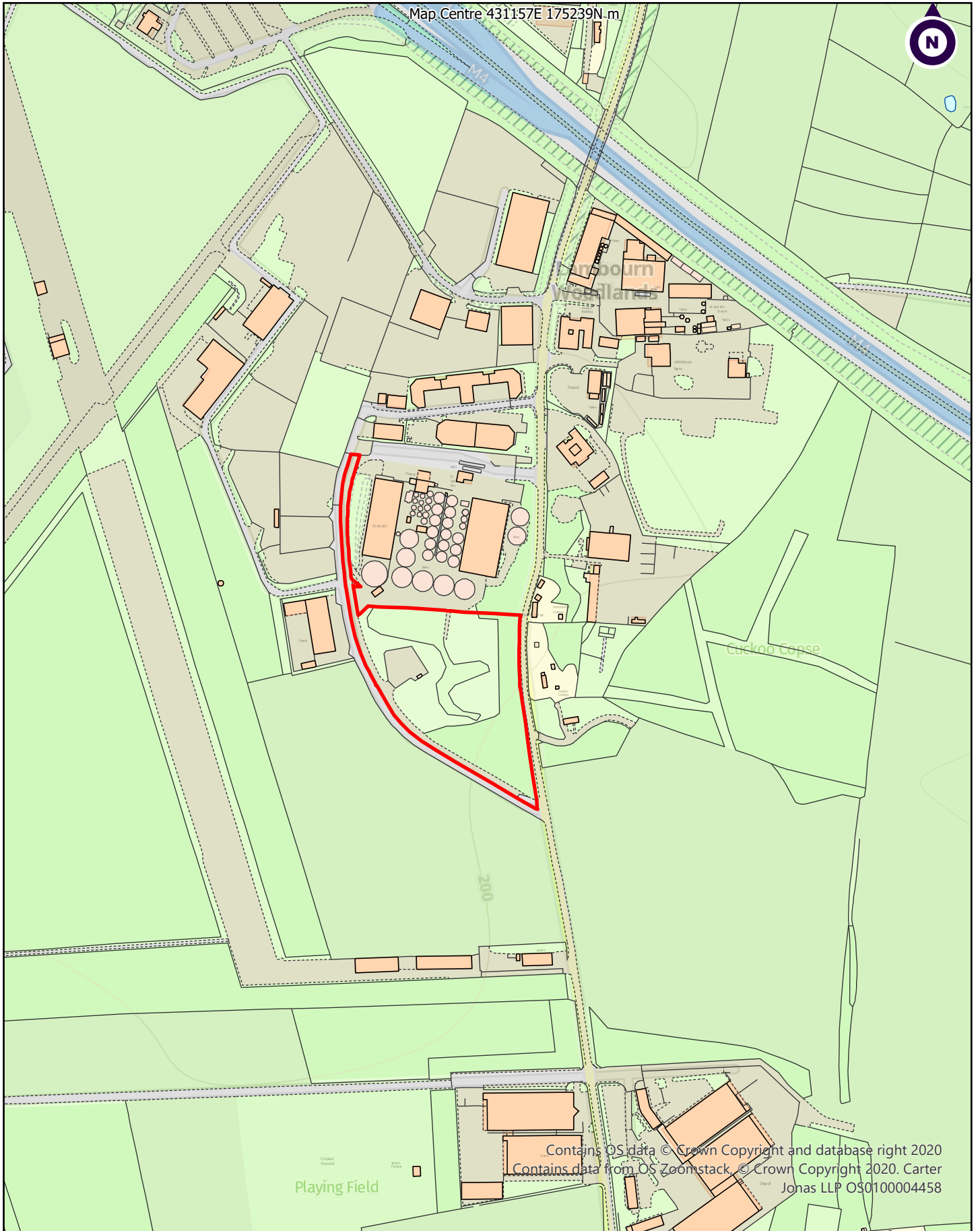
Yours sincerely

**Willow Mercer**  
**Associate Planner**



## Appendix 1: Site Location Plan Demonstrating Extent of Land Ownership

Map Centre 431157E 175239N.m



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Contains data from OS Zoomstack, © Crown Copyright 2020. Carter  
Jonas LLP OS0100004458

Client:

Project: Trinity Grain

Title: Site Location Plan

Scale 1:5,000 @A4

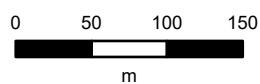
Date: 12/22/2021

Drawn By: WM

Dwg no:

**Carter Jonas**

Two Snow Hill, Birmingham, B4 6GA  
T: 0121 794 6250  
carterjonas.co.uk







## Policy ESA3

### Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)

The site, as shown on the indicative map, will be developed in accordance with the following parameters:

- a. The provision of approximately 5,200 square metres of employment floorspace for B2 and/or E(g)(iii) across the site;
- b. Access to the site will be provided from Ramsbury Road;
- c. Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment will be required;
- d. Measures will be included to improve accessibility by, and encourage use of, non-car transport modes. These measures will be set out in a Travel Plan;
- e. The scheme will be developed in accordance with the Landscape Sensitivity and Capacity Assessment (2022) for Site 2: South of Trinity Grain, and will include the following measures:
  - i. Retain the tree belt/hedgerow along the eastern site boundary and the woodland copse within the southern part of the site; and
  - ii. Buildings should be at a height where they are not visible above the adjacent silo towers and the tree canopy (within the southern part of the site) from the wider landscape to the south and from the Ramsbury Road;
- f. The development design and layout will be in accordance with Policy SP7 and be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA);
- g. Development will be informed by a A Heritage Impact Assessment (HIA);
- h. Development will be informed by a Flood Risk Assessment, which will include appropriate flood mitigation measures, including SuDS;
- i. Development will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected; and
- j. The development design will respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with Policy SP5.



## Appendix 3: Representation Form


**West Berkshire Local Plan Review 2022-2039**
**Proposed Submission Representation Form**
**Ref:**
*(For official use only)*

<b>Please complete online or return this form to:</b>	<b>Online:</b> <a href="http://consult.westberks.gov.uk/kse">http://consult.westberks.gov.uk/kse</a>
	<b>By email:</b> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
	<b>By post:</b> Planning Policy Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>4:30pm on Friday 3 March 2023</b>

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**PART A: Your Details**

*Please note the following:*

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		
First Name:*		Willow
Last Name:*		Mercer
Job title (where relevant):		Associate Planner
Organisation (where relevant):	Trinity Grain Limited	Carter Jonas
Address* Please include postcode:		St Catherines Court, Berkeley Pl, Clifton, Bristol BS8 1BQ
Email address:*	Send correspondence to Agent [Redacted]	[Redacted]
Telephone number:	n/a	[Redacted]

\*Mandatory field

## Part B – Your Representation

### *Please use a separate sheet for each representation*

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Willow Mercer, Carter Jonas LLP on behalf of David Evans, Managing Director of Trinity Grain Limited (Land owner of 'Land to the south of Trinity Grain, Membury Industrial Estate')
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### **Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	'Land to the south of Trinity Grain, Membury Industrial Estate' ESA3, DM32
Appendix:	
Policies Map:	
Other:	

### **1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

#### **Do you consider the Local Plan Review is legally compliant?**

Yes

 Yes

No

 No

*Please give reasons for your answer:*

*Please refer to supporting statement*

## 2. Soundness

Please see the guidance notes for an explanation of what ‘soundness’ means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		<b>No</b>
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		<b>No</b>
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		<b>No</b>
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		<b>No</b>

Please give reasons for your answer:

Please refer to supporting statement

## 3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

### Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes  Yes  No

Please give reasons for your answer:

*Please refer to supporting statement*

**4. Proposed Changes**

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

*Please refer to supporting statement*

**5. Independent Examination**

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?**

Yes

No

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:*

*To allow appropriate updates relating to the development of the draft allocation site to be presented, to allow matters to be resolved because the plan is not sound.*

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

**6. Notification of Progress of the Local Plan Review**

**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X

The adoption of the Local Plan Review	X
---------------------------------------	---

*Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.*

<b>Signature</b>		<b>Date</b>	<b>03.03.2023</b>
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**



## Appendix 4: Pre-application Package

Map Centre 431157E 175239N.m



M4

Ramsbury Road



No Service Credits

Client:  
Project: Trinity Grain

Title: Site Location Plan

Scale 1:5,000 @A4

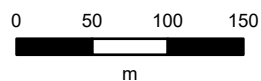
Drawn By: WM

Date: 12/22/2022

Dwg no:

**Carter Jonas**

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T: 0121 794 6250  
carterjonas.co.uk  
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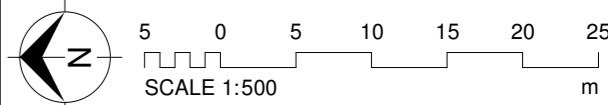
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Container Count
Number of Bays
132
Approximate number of containers subject to vehicle tracking

Rev	Date	Notes	Drn	Chk'd



Document Originator

**AWW**

London - 106 Weston Street, SE1 3QB 020 7160 6000  
 Plymouth - East Quay House, PL4 0HX 0117 923 2535  
 Bristol - pivot + mark, 48 - 52 Baldwin Street, BS1 1QB 01752 261 282  
 RIBA Chartered Practice www.aww-uk.com

Client  
 Trinity Grain

AWW Project Number 4551 Project Stage 2

Project Title  
 Trinity Grain  
 Membury

Title  
 Site Layout with Open Storage

Scale @ A2 Document Status  
 1 : 500

Project	Origin	Volume	Level	Type	Role	Number	Rev
4551	AWW	00	00	DR	A	00104	

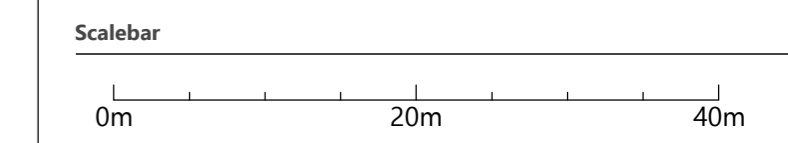


**Key**

- Site boundary
- Existing vegetation retained and enhanced
- Proposed additional native tree and shrub planting belt to reinforce existing vegetation retained
- Proposed new bund/ landform and native tree and shrub planting belt
- Offsite vegetation retained

- Notes**
- The preliminary proposals have sought to minimise landscape and visual effects through a combination of:
    - Retaining, as far as practicable, existing vegetation and landform, especially that to the east and south of the proposed storage area.
    - Providing additional landform to tie in with existing retained.
    - Planting additional trees and shrubs.
  - Additional/ future consideration as part of proposals will be informed by further survey/ appraisals (eg. arboriculture, ecology) and will include:
    - Suitable landscape/ vegetation management to retain/ enhance long term structure and biodiversity.
    - Installation of habitat boxes, refugia and/ or hibernacula as appropriate.

- Proposed tree and shrub species to include:**
- Acer campestre (Field Maple)
  - Cornus sanguinea (Dogwood)
  - Corylus avellana (Hazel)
  - Crateagus monogyne (Hawthorn)
  - Euonymus europaeus (Spindle)
  - Ilex aquifolium (Holly)
  - Ligustrum vulgare (Privet)
  - Prunus avium (Wild cherry)
  - Quercus robur (English oak)
  - Sambucus nigra (Elderflower)
  - Tilia cordata (Small leaved lime)
  - Viburnum opulus (Guelder rose)



**Revisions**

Status	Revision Note	Date	Drawn	Checked	Approved
P01	Pre-application submission.	29/09/2022	CS	SK	SK

**Project**

**Proposed Open Storage**

---

**Drawing**

**Landscape Strategy**

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**Drawing Number**

**NPA 11280 101**

Suitability	Revision	Purpose
S2 Information	P01	Pre-application

Scale	Page Size	Origin Date
1:500	A2	27/09/2022

**Client**

**Trinity Grain**

Container Count
Number of Bays
132
Approximate number of containers subject to vehicle tracking

**General Notes**

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Discrepancies and/or ambiguities between this drawing and information given elsewhere must be reported immediately to this office for clarification before proceeding.

# Preliminary Landscape and Visual Appraisal (Pre-application submission)

**Project Title: Proposed Storage, Land South of Trinity Grain,  
Membury**

Client:	Trinity Grain Ltd
Document No.:	NPA 11280 0001
Revision:	PRE02
Status:	Pre-application
Print Size:	A4/ A3
Date:	September 2022

**NICHOLAS PEARSON ASSOCIATES**

ENVIRONMENTAL DESIGN | LANDSCAPE ARCHITECTURE | ECOLOGY | VISUALISATION

[npaconsult.co.uk](http://npaconsult.co.uk) [npavisuals.co.uk](http://npavisuals.co.uk) +44 (0)1225 876990

The Farm House, Church Farm Business Park, Corston, Bath BA2 9AP

## Document Control

**Project:** Proposed Storage, Trinity Grain, Membury  
**Project No:** 11280  
**Document Title:** Preliminary Landscape and Visual Appraisal  
**Document No:** NPA 11280 0001

Original document       Revision       Revision letter

	<b>Name</b>	<b>Signature</b>	<b>Position</b>	<b>Date</b>
Prepared by:	S Kale	SK	Managing Director	Sept.2022

## Revision Record

Rev letter	Date prepared	Prepared by	Checker / Approver	Description of changes

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## 1.0 Introduction

- 1.1 Nicholas Pearson Associates was appointed by Trinity Grain Ltd, Lambourn Woodlands, near Membury, to undertake a Preliminary Landscape and Visual Appraisal (LVA) with respect to emerging proposals for storage on land adjacent to the existing operations. The description of the development is: "Use of land for B8 storage and distribution (open storage) including the siting of storage containers and associated parking." A proposed Site layout is shown on AWW plan ref; 4551-00104.
- 1.2 The Site comprises a triangular parcel of land situated to the immediate south of the existing operational Site, to the west of Ramsbury Road. The Site is located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).
- 1.3 This Preliminary LVA, undertaken at an early stage in the project, provides an outline of the landscape and visual baseline for the Site and surrounding context. The key landscape planning context and policies, landscape designations and published landscape character assessments are identified and the visual context of the Site is discussed. Initial appraisal work has informed the extent of the emerging potential developable area.
- 1.4 A preliminary Landscape Strategy is presented, which sets out objectives to avoid, minimise, and mitigate, potential adverse landscape and visual effects, in relation to the proposed development of the Site.

## 2.0 Landscape Planning Context

### National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF)<sup>1</sup> sets out the Government's planning policies for England and how these are expected to be applied. It includes requirements for the protection of the natural and historic environments and *Section 15. Conserving and enhancing the natural environment*.
- 2.2 In relation to conserving and enhancing the natural environment it is stated that (paragraph 176):
- "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"*

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<sup>1</sup> Ministry of Housing, Communities and Local Government (2021) '*National Planning Policy Framework*'. London: Ministry of Housing, Communities and Local Government.



*in relation to these issues... The scale and extent of development within these designated areas should be limited..”*

2.3 Paragraph 177 states:

*“When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty...Consideration of such applications should include an assessment of.. c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

### **Local Planning Policy**

2.4 The Core Strategy (2006 – 2026)<sup>2</sup>, Adopted July 2012, forms part of the Development Plan for West Berkshire.

2.5 Area Delivery Plan Policy 5 covers areas of the district within the North Wessex Downs AONB. Within the Environment section of the policy, it is stated that:

*“Recognising the area as a national landscape designation, development will conserve and enhance the local distinctiveness, sense of place and setting of the AONB whilst preserving the strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland. Development will respond positively to the local context, and respect identified landscape features and components of natural beauty.”*

2.6 Policy CS 19 Historic Environment and Landscape Character, states:

*“In order to ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, the natural, cultural, and functional components of its character will be considered as a whole. In adopting this holistic approach, particular regard will be given to:*

*a) The sensitivity of the area to change.*

*b) Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character...*

*Proposals for development should be informed by and respond to:*

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<sup>2</sup> West Berkshire Council (2012) 'West Berkshire Core Strategy (2006 – 2026) Development Plan Document Adopted July 2012 [online] Available at: <https://info.westberks.gov.uk/CHttpHandler.ashx?id=36374&p=0> (Accessed 21.01.2021)

*a) The distinctive character areas and key characteristics identified in relevant landscape character assessments including Historic Landscape Characterisation for West Berkshire and Historic Environment Character Zoning for West Berkshire.*

*b) Features identified in various settlement character studies including Quality Design - West Berkshire Supplementary Planning Document, the Newbury Historic Character Study, Conservation Area Appraisals and community planning documents which have been adopted by the Council such as Parish Plans and Town and Village Design Statements..."*

### **Statutory and Non-Statutory Designations**

#### North Wessex Downs Area of Outstanding Natural Beauty (AONB)

- 2.7 The Site is situated within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The North Wessex Downs cover 1730 km<sup>2</sup>, making it the third largest AONB in the country<sup>3</sup>. 74% of West Berkshire District falls within the North Wessex Downs AONB<sup>2</sup>.
- 2.8 The North Wessex Downs AONB Management Plan 2019-2024<sup>3</sup> sets out the special qualities of the AONB across eight themes: Landscape, Rural Land Management, Biodiversity, Historic Environment, Natural Resources, Development, Communities and Tourism, Leisure and Access.
- 2.9 The landscape special qualities are identified for each of the AONB landscape types. The site falls within Landscape Character Area 2C Lambourn Wooded Downs, see para 3.5 below.
- 2.10 The Management Plan also sets out a series of key issues, strategic objectives and AONB policies for each theme. AONB Policies relating to landscape include:

*"LA 02 Seek to identify and address the main factors that threaten the special qualities of the AONB landscape, e.g., water abstraction, agricultural practices including diffuse pollution of watercourses, lack of woodland management, damage to historic sites, and built development.*

*LA 03 Use the North Wessex Downs Integrated Landscape Character Assessment to inform policy and decision making across the AONB and its setting...*

*LA 06 Ensure that all development in or affecting the setting of the AONB conserves and enhances the character, qualities and heritage of the North Wessex Downs landscape."*

---

<sup>3</sup> North Wessex Downs AONB Management Plan 2019 - 2024 [online] Available at: <https://www.northwessexdowns.org.uk/publications-resources/aonb-management-plan.html> (Accessed 18.01.2021)

2.11 AONB Policies for development include:

*“DE 01 Encourage all proposals for new development, redevelopment and re-use to conserve and enhance the natural beauty of the North Wessex Downs. Oppose forms of development that fail to conserve and enhance the character and quality of the AONB and its setting and to make reference to the AONB’s published guidance.*

*DE05 Encourage the consideration of landscape, including historic landscape, impacts at the earliest opportunity in the planning process through preparation of Landscape and Visual Impact Assessment, Landscape and Visual Appraisal and Environmental Impact Assessment reports as appropriate to the location.”*

2.12 The key issues section for future development (“*issues with the potential to have significant influence on the AONB’s Development Special Qualities*”) includes:

*“New developments at the junction of the M4 and A34 or along their corridors which spread the impact from development yet further into the undeveloped parts of the AONB.”*

### **Public Rights of Way**

2.13 Other than the adjacent public highways there are no Public Rights of Way in the immediate or local vicinity of the Site. The nearest public footpaths are circa 500m to the east (ref: LAMB/18/2) and circa 650m to the south (ref. LAMB/37/1).

### **Planning History**

2.14 The Site is immediately adjacent to a Protected Employment Area (PEA), with other planning applications for development on other land to the west. Previous planning applications in relation to the existing Trinity Grain operations (ref: 08/01881/FUL and 12/01975/COMIND) noted native tree and shrub planting on the Site.

### 3.0 Landscape Context

#### Overview

3.1 Published Landscape Character Assessment (LCA) studies help to establish the landscape baseline. Such LCAs may be of varied scales ranging from broad-scale national character area studies to detailed local authority assessments. 'Guidelines for Landscape and Visual Impact Assessment'<sup>4</sup> recognises that LCAs "*adopted and published by competent authorities are usually the most robust and considered documents*" (GLVIA3; p.77).

#### National Character Areas

3.2 National Character Areas (NCA) are published by Natural England and provide an assessment of landscape character at a national scale. The Site is located within NCA 116 – Berkshire and Marlborough Downs<sup>5</sup>.

#### Local Landscape Character Assessments

##### West Berkshire Landscape Character Assessment

3.3 West Berkshire Landscape Character Assessment<sup>6</sup> provides an assessment of landscape character for West Berkshire. The Site falls within landscape character area WD1: Shefford Wooded Downland, see Plate 1 below.

3.4 Key relevant characteristics of WD1: Shefford Wooded Downland include:

- *"Strong rolling landform with scarp and dipslopes...*
- *Mixed farmland, divided into large-scale fields bound by mature hedgerows and broken up by blocks of woodland...*
- *Sheltered, wooded character restricts views and creates an enclosed landscape which contrasts with panoramic views experienced from vantage points...*
- *Traditional rural landscape with few modern intrusions... qualities of this area are reflected in the designation of the whole of this character area as part of the North Wessex Downs AONB. The*

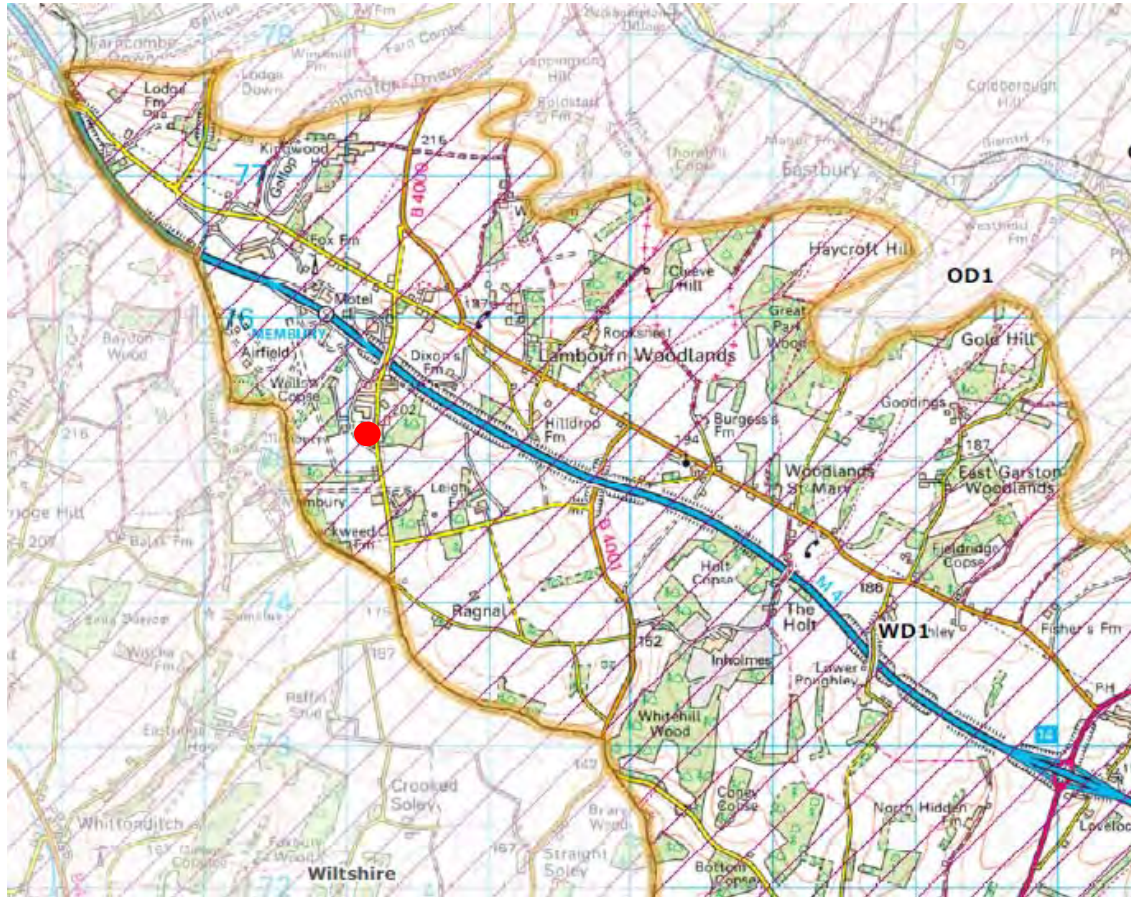
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<sup>4</sup> Institute of Environmental Management and Assessment and Landscape Institute (2013) '*Guidelines for Landscape and Visual Impact Assessment*' Third Edition. Routledge.

<sup>5</sup> Natural England (2015) '*National Character Area Profile: 116. Berkshire and Marlborough Downs*' NE482 [online] Available at: <http://publications.naturalengland.org.uk/publication/4822422297509888?category=587130>

<sup>6</sup> LUC (2019) '*West Berkshire Landscape Character Assessment*' [online] Available at: <https://info.westberks.gov.uk/CHttpHandler.ashx?id=47980&p=0>

*frequent woodland and limited settlement in this area result in high levels of relative tranquility. Major roads within the landscape (including the M4) create localised visual and audial disruption.*



*Plate 1. Site location (red circle) within landscape character area WD1: Shefford Wooded Downland, West Berkshire Landscape Character Assessment. (Plan not to scale)*

#### North Wessex Downs AONB Landscape Character Assessment

- 3.5 North Wessex Downs Area of Outstanding Natural Beauty Integrated Landscape Character Assessment<sup>7</sup> characterises the landscape across the North Wessex Downs AONB. The Site is located within Landscape Character Area 2C Lambourn Wooded Downs. This has a similar coverage and character description to that of the West Berkshire LCA above.

<sup>7</sup> LUC (2002) 'North Wessex Downs AONB Integrated Landscape Character Assessment Technical Report' [online] Available at: <https://info.westberks.gov.uk/lca> (Accessed 20.01.2021)

Site Character and context

3.6 The Site comprises a broadly triangular area of land to the immediate south of the existing Trinity Grain facility, at the southern edge of the varied commercial/ industrial area of development adjacent to/ south of the M4. The site elevation, at between circa 200m – 203m AOD is generally level, with a gentle fall to the south east. It has been subject to previous interventions (landforms and planting), likely relating to previous existing adjacent development. Key Site elements (see site character photos, figure 03) comprise:

- An open, level area of ground to the northern part of the Site. This comprises ruderal vegetative growth, under occasional management/ clearance.
- A relatively small, fenced area of storage/ commercial use at/ towards the western boundary.
- An area of raised ('man-made') ground/ plateau to circa 1-2m height above adjacent areas in the southern part of the Site, with young/ early maturing scrub woodland plantation (varying circa 2-4m tall).
- A linear (north/ south) 2m tall bunded landform toward the eastern part of the Site, covered with ruderal growth.
- An eastern boundary comprising a belt, circa 10m-15m wide, of mature woodland, including oak trees, and varied understorey.
- A western boundary of a 2m tall bunded landform with young/ early maturing native trees and scrub, with occasional semi mature trees (eg. oak).

3.7 The local context (see plate 2 below) comprises the following elements:

- The adjacent Trinity Grain storage facility of circa 15m tall storage silos, and other built forms and hard standings to the immediate north.
- Further industrial and commercial units, with varied relatively largescale built form, to the north.
- Detached residential properties to the east of the Site, along Ramsbury Road, with further commercial land use and buildings to be east.
- An airfield to the west of the industrial/ commercial area, with commercial scale areas of solar panels.
- Membury M4 Service Station to the north west.

- The M4 corridor to the north.
- A mixed landscape of arable farmland and blocks/ belts of woodland to the south west, south and south east, with occasional other commercial units.



*Plate 2. Showing local context around the Site (red oval), including other industrial/ commercial development, M4 corridor; Membury Services and solar panels, together with considerable belts/ blocks of woodland.*

3.8 The night time landscape character of the area is influenced by the extent of the local commercial/ industrial uses to the north of the south. 'Dark Skies' mapping prepared by the CPRE illustrates 'night

light' on a scale of nanowatts/cm<sup>2</sup>/sr, ranging from between <0.25 (darkest) to >32 (brightest). The mapping indicates 'night light' of between 2-4 nanowatts/cm<sup>2</sup>/sr, on the Site which is noted as 'brighter'. The commercial area to the north indicates a night light of between 4-16 nanowatts/cm<sup>2</sup>/sr.

3.9 Overall the Site comprises a very well contained area of previously altered land, not subject to any current use, set within the context and influence of various commercial and industrial land uses adjacent to the M4 corridor. Whilst its location with the AONB is noted, with associated landscape values, the Site and the adjacent industrial/ commercial context does not exhibit the elements of rurality and tranquillity which define the wider landscape.

#### **4.0 Visual Context**

4.1 The visual context of the Site is generally defined by a combination of the local elements of landform, the well vegetated local and wider context and the varied commercial/ industrial built form. The availability of views to visual receptors is also influenced by the distribution of private properties, roads and public rights of way within the area surrounding the Site.

4.2 A preliminary Zone of Theoretical Visibility (ZTV) was prepared (see fig 01). This noted various areas of theoretical visibility, however site appraisal evidenced that the extent of local woodland was considerable which substantially restricted views of/ toward the Site. The range of views is set out below.

4.3 Local views from Ramsbury Road, south east of the Site (see views 1 and 2):

- Receptors; users of road.
- Types of views; sequential/ transient from road.
- Nature of views of/ toward Site; views are generally enclosed and framed by roadside vegetation, with views of the Site only available from immediately adjacent comprising the southern vegetated landscape which conceals views beyond. The existing Trinity Grain silos are partially visible from further south (view 2), seen above roadside hedgerows. Views of the Site are likely to be more open in winter months, but still limited due to the effect of landform.

4.4 Local views from Ramsbury Road, east of the Site (see views 3, 4 and 5):

- Receptors; users of road and private properties.
- Types of views; sequential/ transient from road; generally static/ permanent from properties.



- Nature of views of/ toward Site; views are enclosed and framed, and generally comprise the well vegetated/ wooded eastern boundary. There are some limited, partial glimpsed views immediately adjacent to the Site through the vegetation of the north/ south bounded landform beyond the wooded belt. Views are likely to be more open in winter months. The commercial/ industrial development to the north (see view 5) has a strong influence on related views and associated overall sensitivities.

4.5 Local views from private commercial land to the west and north (no viewpoint photos):

- Receptors; commercial properties/ workers.
- Types of views; sequential/ transient.
- Nature of views of/ toward Site; available views are very limited due to the extent of intervening built form and vegetation. Local/ immediate views from the west comprise the western boundary vegetation, with glimpses of the existing commercial area on Site. The commercial/ industrial development to the north and north west of the Site has a strong influence on related views and associated overall sensitivities.

4.6 Views from the wider area (no viewpoint photos):

- Receptors; users of roads; public footpaths and private properties.
- Types of views; sequential/ transient from road; generally static/ permanent from properties.
- Nature of views of/ toward Site; due to the extent and location of the vegetation views of the Site are not generally available. There is some potential for views in winter, however this is very limited due to the extent/ density of vegetation.

4.7 Night time views of the Site and local context will be influenced by lighting associated with the adjacent industrial area to the north, together with that associated with the motorway service station.

4.8 Overall views of the Site are very limited by the extent and location of intervening vegetation and built form. When visible such views are from the immediate vicinity to the east, north east and south along Ramsbury Road. These views comprise the vegetation along the eastern and southern boundary of the site.

## 5.0 Proposed Development and Mitigation

- 5.1 The proposal comprises open storage, including areas of containers (up to circa 3.5m tall). Access is provided from the existing Trinity Grain facility to the north.
- 5.2 The preliminary proposals have been subject to/ informed by initial landscape and visual appraisal seeking to avoid/ minimise landscape and visual effects and seek landscape enhancements, therefore according, as far as practicalbe, with landscape planning policy and AONB guidelines. Key elements of the design approach presenting a mitigated scheme comprise:
- Retention of the existing woodland belt/ trees on the eastern boundary,
  - Retention of the southern area of raised landform and associated scrub woodland, with consideration of positive/ appropriate management to enhance this feature.
  - Retention and additional reinforcement native planting of western boundary vegetation.
  - Proposed additional bunding and native tree/ shrub planting to infill the gap on the western boundary.
  - Consideration of positive/ appropriate long term management of existing vegetation and proposed planting.
  - Future consideration/ inclusion of a sensitive lighting strategy, prepared in accordance with best practice/ guidance to minimise light pollution.
  - Future consideration for surface water drainage to avoid removal of further vegetation, as far as possible.

## 6.0 Preliminary Landscape and Visual Effects

### Preliminary landscape effects

- 6.1 The proposed development of the Site would result in the:
- Removal of the linear north/ south banded landform.
  - Removal of the existing area of commercial use on the western boundary.
  - Change to the northern part of the Site from an enclosed area of modified, open landscape into an area of hardstanding and associated storage for containers, with associated vehicle movements and any required lighting.

- Increased/ infilled area of bunded landform and vegetation along the western boundary.

- 6.2 These effects would be very localised to the Site only, with very limited indirect effects to the immediately adjacent landscape around the Site. The effect would be to extend the established local landscape character of the existing hardstanding area associated with the industrial area to the north.
- 6.3 Final landscape effects would be dependent upon the nature of the lighting strategy and surface water drainage requirements. However, it is likely there would be limited effect to the local landscape character of the AONB due to the well contained local character and influence of the adjacent existing industrial/ commercial area.
- 6.4 Further assessment of final proposals would need to be undertaken, however at this stage it seems likely that there would be no material effect on the wider AONB including that associated with the special landscape qualities and values associated with its rural, wooded and tranquil character.

#### Preliminary visual effects

- 6.5 The preliminary visual effects (during the daytime) of the proposals will be very limited due to the extent of retained vegetation and local landform.
- 6.6 Limited, glimpsed views of the proposed storage area and containers are likely to be available adjacent to the Site from Ramsbury Road and associated private properties. Such views will be more available during the winter period.
- 6.7 Final daytime effects will depend on the final proposals, including the influence of any required drainage strategy. However, it is likely that there will be no material visual effects to any views beyond the immediate vicinity of the Site.
- 6.8 Final night time visual effects will likely depend on the lighting strategy. However, on the basis of a high quality lighting design, such effects will likely be limited to the local views around the Site, where any lighting may be seen in the context of the adjacent industrial area.
- 6.9 Overall, whilst subject to further assessment of a final scheme, it is likely that visual effects will be very limited and contained to the immediate vicinity of the Site, with only limited/ glimpsed views of the storage area available from Ramsbury Road to the east.

## List of Figures

**Fig. 01: Zone of Theoretical Visibility**

**Fig. 02: Viewpoint location plan**

**Fig. 03: Site character views**

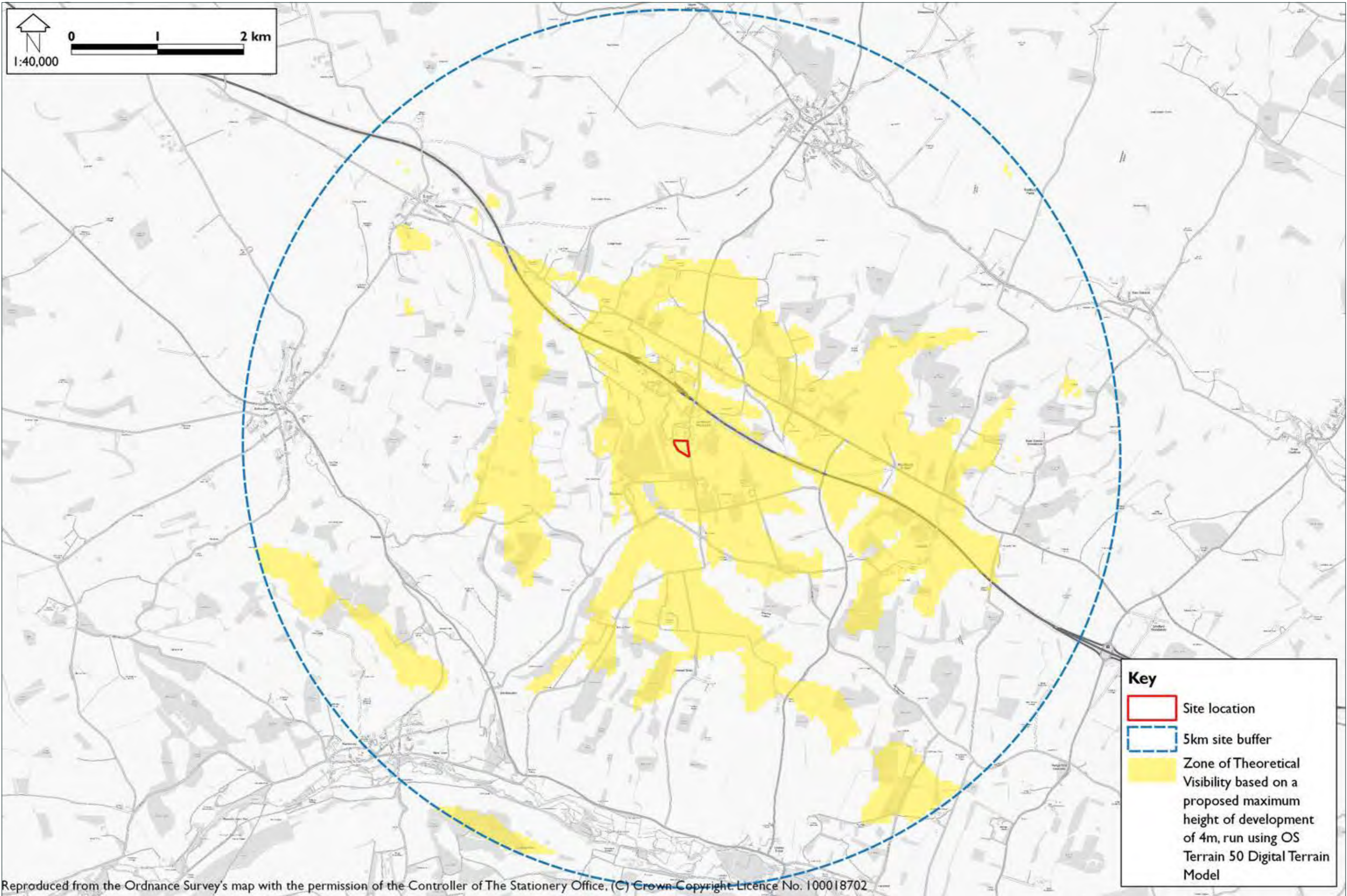
**Fig. 04: Representative view 1 - Ramsbury Road, close to southern boundary of the Site.**

**Fig. 05: Representative view 2 - Ramsbury Road, looking north from south of the Site.**

**Fig. 06: Representative view 3 - Ramsbury Road, looking north along eastern boundary of the Site.**

**Fig. 07: Representative view 4 - Ramsbury Road, looking south along eastern boundary of the Site.**

**Fig. 08: Representative view 5 - Ramsbury Road, looking south from north of the Site, within area of existing commercial/ industrial development.**





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A - View from north east corner of Site looking south



B -View from north east corner of Site looking west



C -View from north west corner of Site looking south



D - View from southern part of Site looking north

Please note: To view this image digitally, calibrate this scale bar, on screen, for a correct scale representation and view the image at a comfortable arm's length (Original image size 390 x 260mm)



Site location

10cm  
0cm  
(Original image size 390 x 260mm)

Please note: To view this image digitally, calibrate this scale bar, on screen, for a correct scale representation and view the image at a comfortable arm's length





Site concealed by intervening vegetation

10cm  
0cm  
(Original image size 390 x 260mm)

Please note: To view this image digitally, calibrate this scale bar, on screen, for a correct scale representation and view the image at a comfortable arm's length



Site beyond vegetation



Please note: To view this image digitally, calibrate this scale bar, on screen, for a correct scale representation and view the image at a comfortable arm's length

<b>Project:</b>	Proposed Storage Facility
<b>Client:</b>	Trinity Grain
<b>Date:</b>	September 2022

**Page Size:** A3

<b>Figure Title:</b>	Fig. 06: Representative view 3 - Ramsbury Road, looking north along eastern boundary of the Site.		
<b>Project No.:</b>	NPA 11280	<b>Status:</b>	Pre-application
<b>Visualisation Type:</b>	Type 1	<b>Image Enlargement:</b>	100%



Site beyond vegetation

10cm  
(Original image size 390 x 260mm)  
0cm

Please note: To view this image digitally, calibrate this scale bar, on screen, for a correct scale representation and view the image at a comfortable arm's length



Site concealed by intervening built form and vegetation

10cm  
0cm  
(Original image size 390 x 260mm)

Please note: To view this image digitally, calibrate this scale bar, on screen, for a correct scale representation and view the image at a comfortable arm's length

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# Preliminary Ecological Appraisal

## Proposed Storage, Trinity Grain, Membury

Client:	Trinity Grain
Document No.:	0002
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## Document Control

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**Project No:** 11280  
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**Document No:** NPA 11280 0002

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	<b>Name</b>	<b>Signature</b>	<b>Position</b>	<b>Date</b>
Prepared by:	W Eden	WE	Graduate Ecologist	Aug /2022
Checked by:	D Harvey	DH	Associate Ecologist	Sept/ 2022
Approved by:	S Kale	SK	Managing Director	Sept/ 2022

## Revision Record

Rev letter	Date prepared	Prepared by	Checker / Approver	Description of changes

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- 1: Habitat Map

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- 1: Habitat Photos
- 2: Target Notes



## 1.0 Introduction

- 1.1 A Preliminary Ecological Appraisal (PEA) was undertaken by Nicholas Pearson Associates (NPA) on behalf of Trinity Grain, who propose to construct open storage areas and parking bays (AWW drawing titled "Option with Open Storage", Number 4551 00104) on land south of Trinity Grain, Membury (OS grid reference: SU 31125 75191), hereafter referred to as "Site". The description of the proposed development is: "use of land for B8 storage and distribution (open storage) including the siting of storage containers and associated parking".
- 1.2 The Site is encircled by roads and the existing Trinity Grain facility is located immediately to the north. The Site is situated in a wider landscape of arable and pasture farmland to the south, gardens and broadleaved woodland to the east, and industrial estates and the M4 motorway to the north. The Site boundary was marked by a road on the western side, a fence and woodland edge on the eastern side, and the edge of the hardstanding facility area to the north.
- 1.3 The purpose of this PEA was to:
- Categorise, map and assess on Site habitats, including with respect to its suitability to support protected species, and the potential impacts proposals may have on the same.
  - Recommend whether further ecological surveys are required.
  - Propose appropriate mitigation.
  - In addition provide sufficient baseline information for a future Biodiversity Net Gain (BNG) assessment if/ as required by policy.

## 2.0 Methodology

### 2.1 Extended Habitat Survey

- 2.1.1 An experienced NPA ecologist visited the Site on the 14<sup>th</sup> July 2022 to record habitats present and assess its potential to support protected species.
- 2.1.2 This included conducting a detailed habitat survey using the UK Habitat Classification methodology, with a fine scale minimum mapping unit (MMU) of 25m<sup>2</sup>. The surveyor also recorded a habitat description for each habitat type.
- 2.1.3 A habitat condition assessment was undertaken using the Defra Biodiversity Metric 3.1 Condition Assessments Sheets. Species lists for 1m<sup>2</sup> quadrats were recorded to assist with the assessment of

habitat quality for grassland habitats. The condition assessment of woodland and other habitats was undertaken using a visual assessment.

- 2.1.4 The central portion of the site had been cut prior to survey. Vegetation was growing back at the time of survey, however a precautionary approach had to be taken when assigning a habitat type and condition assessment.

### **3.0 Legislation and Planning Policy**

#### **3.1 Species Legislation**

- 3.1.1 Species and habitats receive legal protection in the UK under various pieces of legislation, including:

- The Conservation of Habitats and Species Regulation 2017 (as amended) (known as the Habitat Regulations);
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Countryside Rights of Way (CROW) Act 2000;
- The Natural Environment and Rural Communities (NERC) Act 2006;
- National Planning Policy Framework 2019 (NPPF);
- Protection of Badgers Act 1992;
- The Protection of Badgers Act 1992 BS 42020 - The first British Standard on biodiversity management;
- UK Biodiversity Action Plan; and
- Local Biodiversity Action Plan.

#### **3.2 National Planning Policy Framework**

- 3.2.1 National planning policy on biodiversity and conservation is set out in the National Planning Policy Framework (NPPF). This emphasises that the planning system should seek to minimise impacts on biodiversity and provide net gains in biodiversity wherever possible as part of the Government's commitment to halting declines in biodiversity and establishing coherent and resilient ecological networks. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Relevant policies are set out below:

- 3.2.2 Paragraph 174: "*To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife*

*corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity..."*

3.2.3 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

### **3.3 Local Planning Policy**

3.3.1 Relevant planning policies cover the site and are set out within the West Berkshire Core Strategy Development Plan:

- Policy CS17: Biodiversity and Geodiversity states:
  - *"In order to conserve and enhance the environmental capacity of the District, all new development should maximise opportunities to achieve net gains in biodiversity and geodiversity in accordance with the Berkshire Biodiversity Action Plan and the Berkshire Local Geodiversity Action Plan..."*

### **3.4 Species Protection**

3.4.1 In addition to more general protection afforded through UK legislation, further protection is provided to a small group of species, commonly referred to as 'European Protected Species' under the Conservation of Habitats and Species 2017 (also known as the Habitats Regulations). With regards to European Protected Species (which includes all UK bat species) listed under Schedule 2 of the Act, it is an offence to:

- Intentionally or deliberately capture or kill, or intentionally injure the animal
- Deliberately disturb the animal or intentionally or recklessly disturb them in a place used for shelter or protection
- Damage or destroy a breeding site or resting place
- Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.

## 4.0 Results

### 4.1 Habitats

4.1.1 The Site comprised a 2.3ha area, the majority (the northern part of the Site) consisting of dense tall ruderal vegetation, which had been recently cut at the time of the survey. The southern portion of the Site was dense scrub planted within the last 20 years which is developing toward dense woodland, and the eastern portion was mature semi-natural woodland with open areas of bracken. Two areas on the Site were at a higher ground level and consisted of a mix of grassland, scrub, and tall ruderal vegetation. Two hedgerows existed by the western boundary of the Site, and the remainder consisted of hardstanding road and storage areas.

4.1.2 Habitats present on the Site and their condition assessment results (for those habitats which condition assessments are required) are shown below:

- Other neutral grassland (poor condition)
- Mixed scrub (moderate condition)
- Bramble scrub
- Lowland mixed deciduous woodland (moderate condition)
- Modified grassland (moderate condition)
- Bracken
- Native species rich hedgerow with trees - associated with bank or ditch (moderate condition)
- Native species rich hedgerow (good condition)
- Scattered trees (broadleaved)
- Developed land; sealed surface
- Bareground

#### Other neutral grassland (poor condition)

4.1.3 The central area of the Site had been recently topped/cut which constrained the assessment of this habitat. It appeared to be dominated by ruderal vegetation consisting of dense stands of Hemlock *Conium maculatum*, Broad-leaved Dock *Rumex obtusifolius* and Common Nettle *Urtica dioica*, indicative of high levels of nutrient enrichment on this area of the Site.

4.1.4 Bordering the eastern edge of the area of vegetation which had been recently cut, there was a 'linear bank' feature which had been left uncut. This 'linear bank' was covered in tall ruderal vegetation,

dominated by species Broad-leaved Dock, Mugwort *Artemisia vulgaris* and Creeping Thistle *Cirsium arvense*.

4.1.5 In the western portion of the Site, part of the ground exists at an elevated level, where the tall ruderal vegetation transitions up the slope into a rough patch of grassland which at the time of survey had been allowed to grow long. This was categorised as other neutral grassland due to a species diversity of an average of 10 plant species per square metre, however the grassland was in poor condition.

4.1.6 The grassland was dominated by False Oat-grass *Arrhenatherum elatius*, and also consisted of grasses Yorkshire Fog, Common Bent *Agrostis capillaris*, Red Fescue *Festuca rubra*, Cock's-foot *Dactylis glomerata* and Rough Meadow-grass. There was also a diversity of common, weedy forb species such as Common Mouse-ear *Cerastium fontanum*, Ribwort Plantain *Plantago lanceolata*, Teasel *Dipsacus fullonum*, Creeping Thistle, Hogweed *Heraculum sphondylium*, Hawkweed Oxtongue *Picris hieracioides*, Selfheal *Prunella vulgaris*, Colt's-foot *Tussilago farfara*, Creeping Buttercup *Ranunculus repens* and White Clover *Trifolium repens*.

Mixed scrub (moderate condition)

4.1.7 The southern portion of the Site was dense scrub, which with time will develop into broadleaved plantation woodland. Here, a mix of tree and shrub species had been planted (likely within the last 20 years) very close together. At the time of survey, shrub species were still dominant so the habitat was categorised as scrub rather than woodland. Species included Lime *Tilia sp.*, Hawthorn *Crataegus monogyna*, Wayfaring Tree *Viburnum lantana*, Hazel *Corylus avellana*, Cherry *Prunus avium* and Oak *Quercus robur*.

4.1.8 Most of the ground flora in this area was non-existent due to the shading, however the flora within more open areas was dominated by Yorkshire Fog *Holcus lanatus*, Rough Meadow-grass *Poa trivialis*, Creeping Thistle and a species of moss. A single Pyramidal Orchid *Anacamptis pyramidalis* plant was also recorded.

Bramble scrub

4.1.9 There was also a small area of dense scrub in the western part of the Site, which was dominated by Bramble *Rubus fruticosus*.

Lowland mixed deciduous woodland (moderate condition)

- 4.1.10 A mature strip of broadleaved woodland of ~25 metres wide, existed along the eastern boundary of the Site. This woodland had a diversity of tree species and good structural diversity including mature canopy and understorey trees, and occasional seedlings suggesting woodland regeneration. Canopy trees consisted of Ash *Fraxinus excelsior*, Cherry and Oak, with understorey trees consisting of Hawthorn, Blackthorn *Prunus spinosa* and Hazel. Most Ash trees appeared to be in a poor state of health.
- 4.1.11 The ground flora in the woodland was mostly lacking diversity as the lack of gaps in the canopy meant the ground was well shaded, being dominated by Common Nettle and Ground Ivy *Glechoma hederacea*. There were sparse areas of more diversity consisting of Dog's Mercury *Mercurialis perennis*, Bush Vetch *Vicia sepium* and Red Campion *Silene dioica*.
- 4.1.12 This is a S41 Habitat of Principal Importance (BAP Priority Habitat).

Modified grassland (moderate condition)

- 4.1.13 A single, very small patch of modified grassland existed at the north west part of the Site. This area was surrounded by hardstanding, and consisted of species such as Yorkshire Fog, Perennial Rye-grass *Lolium perenne*, Red Fescue, White Clover, Ribwort Plantain, Hogweed, Dandelion *Taraxacum sp.*, Bristly Oxtongue *Helminthotheca echioides* and Bird's-foot Trefoil *Lotus corniculatus*.

Bracken

- 4.1.14 Within the broadleaved woodland strip at the east of the Site, there were two clearings which were dominated by Bracken *Pteridium aquilinum*.

Native species rich hedgerow with trees - associated with bank or ditch (moderate condition)

- 4.1.15 Near the western boundary of the Site existed a hedgerow consisting of the species Blackthorn, Field Maple *Acer campestre*, Spindle *Euonymus europaeus*, Hazel, Hawthorn. There were also standard Ash trees within the hedgerow, and the hedgerow was on a bank. Native hedgerows are a S41 Habitat of Principal Importance (BAP Priority Habitat).

Native species rich hedgerow (good condition)

- 4.1.16 Slightly further south, there was another hedgerow, which was also species rich consisting of Hazel, Field Maple, Ash, Holly *Ilex aquifolium*, Spindle and Hawthorn. Native hedgerows are a S41 Habitat of Principal Importance (BAP Priority Habitat).

Scattered trees (broadleaved)

4.1.17 There was an individual, mature Oak tree in the western part of the Site.

Developed land; sealed surface (hardstanding)

4.1.18 In the western and northern parts of the Site, there were areas of hardstanding comprising access roads and storage areas.

Bareground

4.1.19 There was one area of bareground (bare soil), which appeared to be where vehicles had been accessing the central part of the Site. If left alone, ruderal/ephemeral plants would colonise this area.

## 4.2 Species

Bats

4.2.1 Trees within the woodland may support roosting bats. The one individual Oak tree on the Site was assessed as having negligible potential to support roosting bats.

4.2.2 The woodland, dense scrub, hedgerows and scattered trees provide foraging and commuting habitat for bats.

Badgers

4.2.3 No Badger setts or evidence of Badgers was found on the Site. The woodland, scrub and grassland habitats provided suitable foraging and potential future sett building habitat.

Hazel dormouse

4.2.4 The woodland, scrub and hedgerows on Site, with their connection to woodland to the east, provide suitable Dormouse habitat.

Hedgehog

4.2.5 The Site provides suitable habitat for the S41 species Hedgehog.

Birds

4.2.6 The woodland, scrub, hedgerows and scattered trees provide suitable nesting habitat for birds.

Reptiles

4.2.7 The south/west facing sides of the other neutral grassland and 'linear bank' (TN4) tall ruderal habitat provide suitable habitat for reptiles. A log pile (TN1) also provides a potential refuge feature. The Site

has the potential to support reptiles, although due to the small area of suitable habitat it is unlikely that there would be a large or significant population.

#### Amphibians

4.2.1 No ponds/standing water within 250m of Site were shown on OS mapping. As such the Site is considered of negligible value for amphibians and outside the range of any Great Crested Newt populations.

#### Invertebrates

4.2.2 The Site is likely to support a range of invertebrates however due to the small area and the widespread nature of the habitats on the Site it is considered unlikely that a notable assemblage of invertebrates would be present.

## **5.0 Ecological Constraints and Opportunities**

5.1.1 Table 5.1 below sets out; measures to avoid/minimise negative impacts, opportunities to enhance Site ecology and recommendations for further surveys. These matters should be reviewed as the results of further ecology surveys come forward and as the design proposals progress.

5.1.2 The current proposals, at this preliminary stage, have sought to minimise habitat loss through the retention of the woodland and scrub areas, and provide opportunities for enhancement through native species tree and shrub planting, through potential installation of habitat boxes/ refugia and implementation of suitable long term management. Further ecological assessment will be undertaken when the pre-app response is received, and the proposals are progressed (including lighting and drainage proposals).

5.1.3 Overall, final proposals would avoid/minimise any negative impacts and be in accordance with planning policies and nature conservation legislation if they:

- Protect the woodland, scrub and hedgerows which provide habitat for a range of species.
- Maintain a coherent network of unlit habitat.

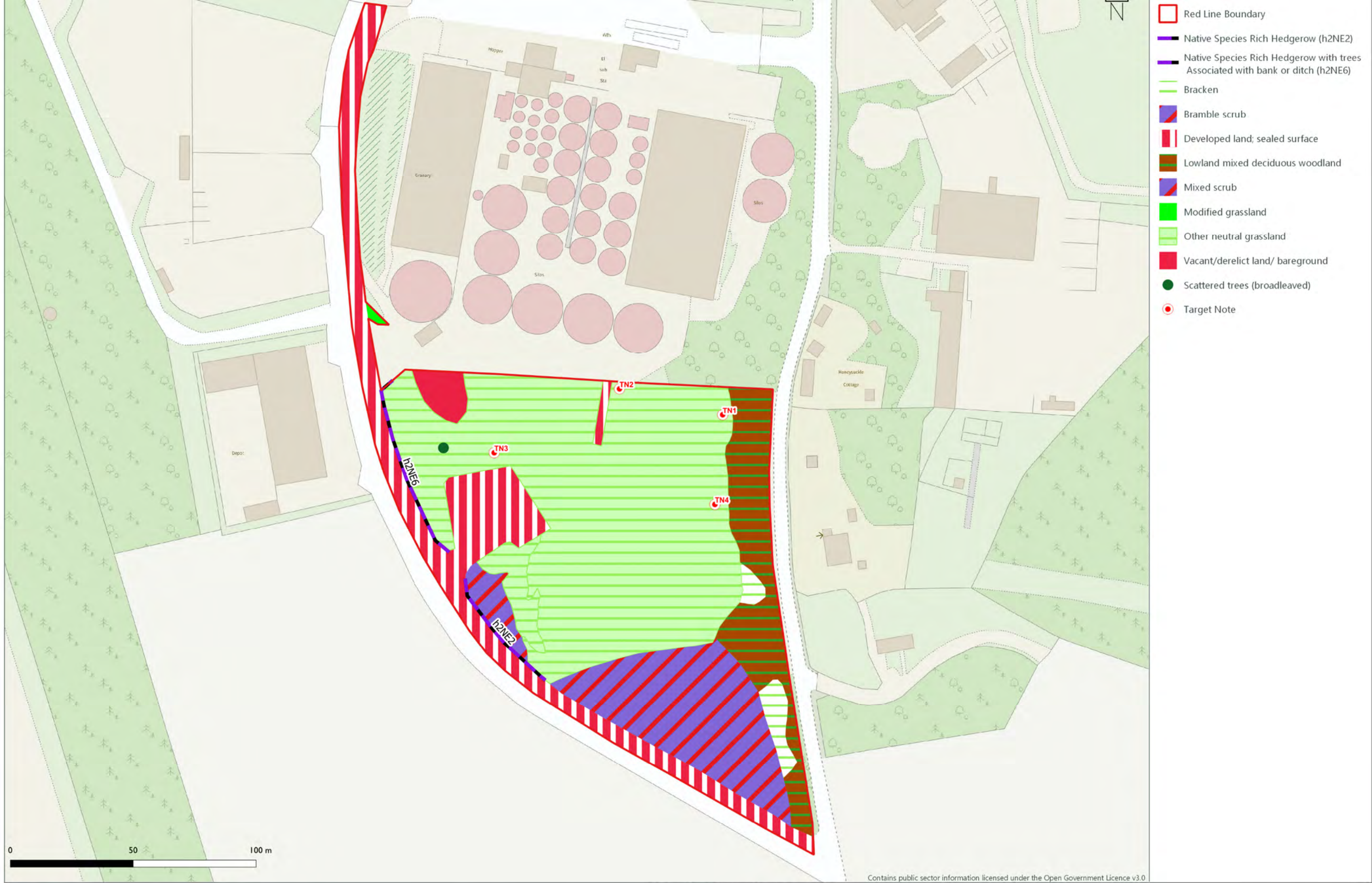
5.2 The final proposals will need to ensure biodiversity enhancements are provided. This could potentially be achieved through retention and improvement of the condition of the woodland, scrub and hedgerow habitats, and creation of diverse grassland margins. As the current local planning policy does not require a quantitative assessment of biodiversity net gain, it is proposed a qualitative assessment will be undertaken.



**Table 5.1. Key constraints/opportunities**

Ecological Receptor	Key Constraints/Opportunities	Further Survey
Habitats	<p>Retain and protect the S&gt;41 Habitats of Principal Importance (BAP Priority Habitats) woodland and hedgerows, and avoid/ limit loss of scrub, which provide habitat for a range of species, and maintain a coherent network of unlit habitat.</p> <p>In accordance with national policy seek to achieve net gains in biodiversity through habitat protection and creation. Habitat creation could include pollinator friendly planting, and the installation of bat and bird boxes.</p>	None
Bats	<p>Trees in the woodland have the potential to support roosting bats.</p> <p>Where practicable aim to retain trees with roosting potential.</p> <p>If any roosts/potential roosts are to be lost appropriate mitigation will need to be provided.</p> <p>Maintain coherent network of unlit woodland, scrub and hedgerow habitat for commuting and foraging.</p>	<p>If the woodland is to be impacted, a further assessment of individual trees for their bat roost potential would be required.</p> <p>If trees in the woodland with potential suitability for roosting bats are to be impacted (e.g. felled or subject to increased lighting) then the trees should be subject to detailed surveys.</p> <p>If the proposals show minimal land take and loss of foraging/commuting habitats, and provide a coherent and dark green infrastructure network, then it's likely bat activity surveys could be avoided. Should this not be possible then it is likely a series of manual and automated activity surveys would be recommended (April-October inclusive).</p>
Badgers	<p>No setts or badger evidence recorded, but suitable foraging and future sett building habitat present.</p>	Update surveys in advance of construction.
Birds	<p>Avoid/limit loss of features suitable to support nesting and foraging birds.</p>	If any nesting bird habitat is proposed to be removed within the breeding bird season (March –

Ecological Receptor	Key Constraints/Opportunities	Further Survey
	Maintain and enhance diversity of habitats present. Incorporate nesting features (within buildings and/or on trees) and foraging habitat (e.g. fruit and berry producing plant species) as part of the proposals.	August inclusive), this would be subject to a check by an ecologist immediately prior to works commencing.
Dormouse	Retain and protect woodland, scrub and hedgerow habitats.	None.
Reptiles	Avoid/limit loss and avoid disturbance during construction of suitable habitats (scrub, grassland, south/west facing slopes).  Sensitive habitat clearance ahead of works. Log pile (TN1) to be removed sensitively outside of reptile hibernation season.	None.
Hedgehogs	Avoid/limit loss of suitable habitat. Sensitive habitat clearance ahead of works. Proposals to allow for connectivity.	None.
Invertebrates	Retain and enhance habitats present, especially woodland, scrub and hedgerows.  Avoid/limit increase in lighting.	None.





**Appendix 1: Habitat Photos**

Photo no.	
1	 <p data-bbox="347 965 724 994">Recently cut tall ruderal vegetation.</p>
2	 <p data-bbox="347 1440 1382 1469">Tall ruderal vegetation on 'linear bank' feature, with other woodland; broadleaved in background.</p>

3		
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Upper photo: understorey of other woodland; broadleaved.  
Lower photo: facing north, woodland edge on the right and 'linear bank' tall ruderal vegetation on the left.

4	 A photograph showing the understorey of a dense plantation scrub habitat. The ground is covered with fallen leaves and low-lying vegetation. Several trees with grey bark are visible, some with protective sleeves around their trunks. A green mesh fence is partially visible in the background.	
5	 A photograph showing a field of tall, dry grasses, identified as other neutral grassland. The grasses are yellowish-brown and interspersed with green plants and small yellow flowers. In the background, there is a building with solar panels and a fence.	

6	 A photograph showing a dense thicket of green bracken ferns in the foreground. In the background, there is a clearing of taller trees under a blue sky with scattered white clouds.	
7	 A photograph of a patch of modified grassland. The grass is dry and brownish, with some green weeds. The patch is bordered by grey asphalt or concrete hardstanding. In the background, there are industrial buildings and a fence.	



8		
9		



Species rich native hedgerow with trees; associated with bank or ditch.

Species rich native hedgerow.



**Appendix 2: Target Notes**

Target Note no.	Photo and description
TN1	 <p data-bbox="347 1019 1390 1077">Log pile, potential reptile refuge habitat and hibernacula. Located on northern end of 'linear bank' feature.</p>
TN2	 <p data-bbox="347 1686 794 1713">Small mammal burrow, likely from Rabbit.</p>

TN3		
TN4		

Small mammal burrow.

'Linear bank' with west facing slope, potential (albeit suboptimal) reptile habitat.

# NICHOLAS PEARSON ASSOCIATES

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ENVIRONMENTAL DESIGN | LANDSCAPE ARCHITECTURE | ECOLOGY | VISUALISATION

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# LAND SOUTH OF TRINITY GRAIN, MEMBURY

## Pre-Application Scoping Note

September 2022

Trinity Grain

**INDUSTRIAL DEVELOPMENT  
LAND SOUTH OF TRINITY GRAIN  
MEMBURY**

**PRE-APPLICATION SCOPING NOTE**

**CONTROLLED DOCUMENT**

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2	27.09.22	DL	Updated Site Layout	AST

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**INDUSTRIAL DEVELOPMENT  
LAND SOUTH OF TRINITY GRAIN  
MEMBURY**

**PRE-APPLICATION SCOPING NOTE**

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Appendix B: Proposed Development Site Plan

Appendix C: Access and Tracking Drawings

Appendix D: Full TRICS Output

## 1. INTRODUCTION

1.1 This Pre-Application Scoping Note (PSN) has been prepared by Paul Basham Associates on behalf of Trinity Grain Limited to identify the scope of work needed to support a planning application for the proposed development of land to the south of the existing Trinity Grain Site. The proposals identify that the land south of Membury Industrial Estate will be developed into B8 storage and distribution uses (open storage) including the siting of storage containers and associated parking. The site is located within the Membury Industrial Estate and is shown by **Figure 1**.



**Figure 1:** Site Location

1.2 The Highway Authority and Local Planning Authority is West Berkshire Council (WBC).

- 1.3 Trinity Grain Ltd are a UK based grain storage company who market over 200,000 tonnes of combined crops to the south of England. They currently have three sites in Micheldever, Shrewton and Membury and a fleet of haulage vehicles which ensure these stores have sufficient vehicles for transferring grain during harvest.
- 1.4 The proposed development site is located to the south of Trinity Grain's existing Membury site, however it is proposed that the site will be occupied by a third-party which will operate the site independently of the Trinity Grain site. An occupier for the proposed development site has not yet been identified.
- 1.5 A site visit was conducted in July 2022 and the observations made during this visit have been used to help inform this report.

### **Purpose**

- 1.6 Agreement is sought from WBC that the principle of the development, the proposed access arrangements, and the anticipated transport impact is acceptable. Agreement is also sought from WBC on the proposed scope of a future Transport Statement and Travel Plan Statement.



## 2. NATIONAL, REGIONAL AND LOCAL POLICY FRAMEWORK

### National Planning Policy Framework (NPPF)

2.1 The National Planning Policy Framework (NPPF) acts as the central guidance for development planning, replacing all previous national planning policy guidance. The following NPPF paragraphs are relevant to this application.

2.2 NPPF Paragraph 104 states the following with regards to Transport issues:

*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- a) *The potential impacts of development on transport networks can be addressed;*
- b) *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised.*
- c) *Opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

2.3 NPPF Paragraph 105 concerns development being focused on locations that are deemed or can be made sustainable and states:

*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.*

2.4 NPPF Paragraph 111 concerns refusal of development and states:

*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

2.5 NPPF Paragraph 113 concerns the documents required to support a planning application and 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.*

### West Berkshire Core Strategy – Development Plan Document (2006 – 2026)

2.6 The Core Strategy provides an overall framework for development, detailed policies and site-specific proposals for West Berkshire. The policies provided below are relevant and in connection with the development site.

2.7 Policy CS13 within the Core Strategy provides a brief overview of the transport requirements and states:

*Development that generates a transport impact will be required to:*

- *Reduce the need to travel;*
- *Improve and promote opportunities for healthy and safe travel;*
- *Improve travel choice and facilitate sustainable travel particularly within, between and to main urban areas and rural service centres;*
- *Demonstrate good access to key services and facilities;*
- *Minimise the impact of all forms of travel on the environment and help tackle climate change;*
- *Mitigate the impact on the local transport network and the strategic road network;*
- *Take into account the West Berkshire Freight Route Network (FRN); and*
- *Prepare Transport Assessments/Statements and Travel Plans to support planning proposals in accordance with national guidance.*

### West Berkshire Emerging Local Plan Review (2020-2037)

2.8 Policy SP21 of the Local Plan Review proposes the extension of existing Designated Employment Areas (DEAs) for industrial, storage and distribution uses. The Membury Industrial Estate has been identified to provide an additional 27,600m<sup>2</sup> of employment floorspace. Policy SP21 states:

*Planning applications for employment uses on these sites will be supported provided that detailed proposals:*

- a) Are broadly consistent with the indicative provision for floorspace; and*
- b) Are complementary to the existing uses in that location; and*
- c) Are consistent with the integrity and function of the location for employment uses.*

*Planning permission for other commercial and services (Class E) uses will be granted provided that criteria b) and c) are met, and the proposals do not prejudice the future development potential of the extended area.*

2.9 The proposed development of the site for B8 storage and distribution use is consistent with the emerging Local Plan allocation.

### 3. LOCAL PLANNING HISTORY

- 3.1 In 2019, WBC granted outline planning permission (ref: 19/02979/OUTMAJ) on the land directly south of the proposed development site for the:

*Erection of a new logistics warehouse building (for occupation by Walker Logistics) (Use Class B8) with ancillary office floorspace, an aircraft museum building (Use Class D1), and associated access, car parking and landscaping. Matters to be considered: Scale.*

- 3.2 Whilst the application was approved, the highways officer objected to the proposals on the grounds of sustainability stating:

*I conclude no objection is raised by the highway authority on traffic grounds. However, objection could be raised by the highway authority on sustainability grounds. It has been policy of the Highways Development Control team for some time to try to resist expansion of the Membury Industrial Estate due to how unsustainable the location is. It could be considered that if the Climate Emergency is to be taken seriously then this proposal should be resisted.*

- 3.3 Within the Committee Report however, the planning officer made the following comments regarding accessibility:

*While these objections are important material considerations, the application site is directly adjacent to the PEA [Protected Employment Area], an area that is stated in policy to be one for focal points for industrial development of this kind, and were it to be within the PEA then it would be hard to resist such development on grounds of sustainability.*

- 3.4 The planning application was subsequently approved in May 2021 with access as a reserved matter.

- 3.5 The site layout which accompanied the planning application is included at **Appendix A**.

- 3.6 Given the planning permission granted to this adjacent site for B8 use, and the proposed allocation of the Membury Industrial Estate for employment floorspace expansion, it is considered that the further development of B8 uses at the industrial estate should not be resisted in principle or on accessibility grounds.

#### 4. EXISTING SITE CONDITIONS

##### Existing Site

- 4.1 The proposed development site is currently undeveloped and is located directly south of the existing Trinity Grain site, within the Membury Industrial Estate. As discussed, the industrial estate is proposed for the allocation of an additional 27,600m<sup>2</sup> of employment floorspace within the emerging Local Plan.
- 4.2 The proposed development site lies between the existing Trinity Grain site and the approved Walker Logistics site.
- 4.3 The site is bound to the north by the existing Trinity Grain site, to the east by Ramsbury Road and to the south and west by an unnamed, private road that provides access to the industrial estate from Ramsbury Road. The site context is shown by **Figure 2**.



Figure 2: Site Context

### Existing Access Arrangements

- 4.4 The private road, from which the site is currently accessed, measures approximately 7.3m wide and is accessed from Ramsbury Road at a simple priority junction to the south of the proposed development site. This junction is shown in **Photograph 1**.



**Photograph 1:** Ramsbury Road/ Industrial Estate Access Junction

- 4.5 Ramsbury Road is subject to the National Speed Limit of 60mph. The existing visibility at the Ramsbury Road/ Industrial Estate Access Road junction is shown by **Photographs 2 and 3**.



- 4.6 Visibility to the south is currently partially constrained by a hedgerow which acts as the boundary feature for the adjacent site, on which the Walker Logistics development has been approved.
- 4.7 With reference to the site layout for the Walker Logistics site, it appears that this hedgerow would be removed and replaced with the site access junction for Walker Logistics. While access is a reserved matter for the Walker Logistics site, any access will be required to demonstrate suitable visibility looking south along Ramsbury Road. As such, visibility at the Ramsbury Road/ Industrial Estate Access Road junction will be improved by the Walker Logistics site access.
- 4.8 Irrespective of the proposed access for the Walker Logistics site, the Ramsbury Road/ Industrial Estate Access Road junction is the existing access for the Membury Industrial Estate and operates with an excellent safety record as set out later in the report. As also set out later in the report, the proposed development will generate a minimal number of trips and the Ramsbury Road/ Industrial Estate Access Road junction should be seen as being able to safely accommodate this slight increase in trips without any changes required.

### Existing Highway Network

- 4.9 The B4000 is a classified B-road which travels between Highworth in Wiltshire to the A34/ B4000/ A4 roundabout in Speen. Access to this road is provided approximately 1.5km north of the Ramsbury Road/ Industrial Estate Access Road junction.
- 4.10 Access to the M4 Junction 14 is provided approximately 6km east of the site while Junction 15 is located approximately 13km west of the site.
- 4.11 It is important to highlight that Ramsbury Road and the B4000 are designated as Local Access Routes within the WBC's Freight Route Network which provides access to local sites within West Berkshire.
- 4.12 The site is well located for access both to the local classified road network, as well as the national strategic road network. This makes the site ideally located for B8 development.

### Collision Data

- 4.13 Personal Injury Accident Data (PIA) has been assessed to establish the existing safety conditions on the local highway network within the vicinity of the proposed site. This data has been collated for a five-year period from 2017-2021. **Figure 4** demonstrates that there have been no collisions resulting in personal injury occurring along Ramsbury Road or within close proximity to the site.



**Figure 3:** Crashmap Plot of Collisions

## 5. SITE ACCESSIBILITY AND PRINCIPLE FOR DEVELOPMENT

- 5.1 It is recognised that the development site is relatively remote for access via sustainable modes of travel such as walking, cycling and public transport. However, the site is considered suitable for the development of B8 uses given its relatively low trip generation and inherently necessary access by motorised vehicles.
- 5.2 As set out in previous sections, the Membury Industrial Estate is proposed for allocation for employment floorspace expansion, and B8 use of an adjacent site has been recently permitted. It is therefore evident that the site has been deemed suitably accessible for B8 use by WBC.
- 5.3 Accessibility by sustainable modes is set out below.

### **Walking Network**

- 5.4 Currently, there are a limited network of pedestrian routes in the vicinity of the site. There are no footways along the private road which the site will be accessed from or Ramsbury Road. In addition to this, there are no Public Rights of Way routes within the vicinity of the site.

### **Cycle Network**

- 5.5 A Regional Cycle Route travels along Ramsbury Road and provides on-road cycle routes to Reading, Hungerford, Lambourn and Newbury. In addition to this, National Cycle Route 4 (NCR4) is located approximately 10km south of the site in Hungerford and provides a route between Reading and Bristol.

### **Bus Services**

- 5.6 The closest bus stops to the site are The Hare stops which are located c. 1.7km north-east of the site at the B4000/ Ermin Street junction. This bus stop is served by the 4a bus service which travels between Newbury to Lambourne and passes the stops twice a day.

### **Rail Services**

- 5.7 Hungerford Railway Station is located approximately 10km south of the site. This station provides regular rail services to destinations including Newbury, Exeter and London Paddington.

### **Summary**

- 5.8 While the site benefits from limited accessibility by sustainable modes, sustainable access to the site is possible. Given the proposed B8 use, the site is considered suitably accessible by sustainable modes in accordance with Paragraph 105 of the NPPF.



## 6. PROPOSED DEVELOPMENT

- 6.1 The proposed B8 development is comprised of 1,900m<sup>2</sup> of open storage space, 132 container storage units and a total of 12 car parking spaces comprised of two HGV spaces and 10 car spaces. The containers each measure 2.43m x 6.06m and therefore total 1,944m<sup>2</sup>.
- 6.2 The proposed development comprises a total storage space of 3,844m<sup>2</sup>.
- 6.3 A site plan is included at **Appendix B**.

### Access Arrangements

- 6.4 Access to the site will be located at the northern boundary of the site, via the existing Trinity Grain site to the north. The access will be of sufficient size to enable the turning movements of a 16.5m HGV.
- 6.5 Access arrangements are demonstrated by a general arrangement drawing included at **Appendix C**.

### Parking Arrangements

#### Standards

- 6.6 The adopted parking standards are set out within the West Berkshire District Local Plan 1991-2006 (Saved Policies 2007). These standards are expressed as maximums and state that up to one space should be provided per 200sqm of B8 floor area. For the proposed storage space of 3,844m<sup>2</sup> the standards suggest a maximum provision of 19 spaces.
- 6.7 Parking policy within the emerging local plan is set out by Policy DC 36 which states:
- The level of vehicular parking required will be judged on a case by case basis and will take account of:*
- *the accessibility of the development*
  - *the type, mix and use of development*
  - *the availability of and opportunities for public transport*
  - *local car ownership levels, and*
  - *other locally specific issues.*
- 6.8 It is evident that emerging parking policy encourages a bespoke assessment of parking needs for proposed developments. The proposed development is for B8 storage and will not include any full-time employees based at the site. It is anticipated that vehicles will access the site and load/ unload goods before departing shortly afterwards. The demand for parking will consequently be very low.

### Provision

- 6.9 It is proposed that the site provides 10 car parking spaces and two spaces for HGVs. The site layout (**Appendix B**) identifies that these spaces will be provided to the west of the site access. This volume of parking is anticipated to significantly exceed demand.
- 6.10 The provision responds to the use and anticipated operation of the site in line with emerging parking policy. The proposed provision is also consistent with the adopted standards given that they are expressed as maximums.

### **Vehicle Tracking**

- 6.11 The largest vehicle which will enter the development site is a 16.5m articulated HGV. This vehicle is able to enter, turn around within the site boundary and egress in a forward gear.
- 6.12 A vehicle tracking drawing is included at **Appendix C**.

## 7. TRIP GENERATION AND TRANSPORT IMPACT

7.1 As discussed, the proposed development's total usable GFA will measure 3,844m<sup>2</sup>.

7.2 The site is currently undeveloped and therefore has a negligible number of trips associated with it.

### Proposed Trip Generation

7.3 In order to identify the number of vehicular trips associated with the development of 3,844m<sup>2</sup> B8 use, the national system of trip generation analysis, TRICS, database has been consulted for B8 'Employment' uses with the sub-category of 'Warehousing (self-storage)' using the following search criteria:

- England (excluding Greater London);
- Surveys Monday – Friday;
- Between 5,000<sup>2</sup>m and 8,000<sup>2</sup>m;
- 'Edge of Town' and 'Suburban' areas; and
- No Travel Plans

7.4 The anticipated net trip generation of the site with the existing use is shown by **Table 1**.

	AM Peak (08:00-09:00)		PM Peak (17:00-18:00)		12 Hr (07:00-19:00)
	Arr	Dep	Arr	Dep	
Trip Rates (per 100m <sup>2</sup> )	0.109	0.078	0.057	0.135	3.014
Trip Generation (3,844m <sup>2</sup> .)	4	3	2	5	115
<b>Total</b>	<b>7</b>		<b>7</b>		<b>115</b>

**Table 1:** Proposed Development Trip Generation

7.5 The TRICS data suggests that the proposed development would generate approximately 7 vehicle trips across the AM and PM peak travel periods. Across a 12-hour period, the site is expected to generate a net increase of approximately 115 vehicle trips which equates to the addition of one vehicle trip onto the local highway network every 7-minutes on average.

7.6 The proposed development would not generate a significant number of trips. As Ramsbury Road is identified as a Local Access Route for HGVs and connects to the local classified road network, the trip generation associated with the proposed development could be comfortably accommodated by the local road network.

7.7 Full TRICS output is included at **Appendix D**, and is considered as a worst-case mindful that the majority of the storage is open storage rather than enclosed warehousing.

## 8. SCOPE OF TRANSPORT STATEMENT AND TRAVEL PLAN

8.1 The proposed scope of a future Transport Statement to accompany a planning application is as follows:

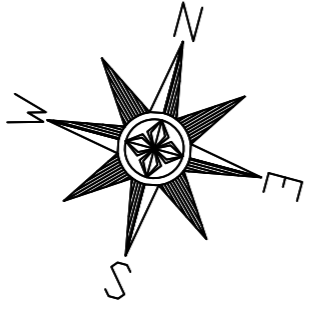
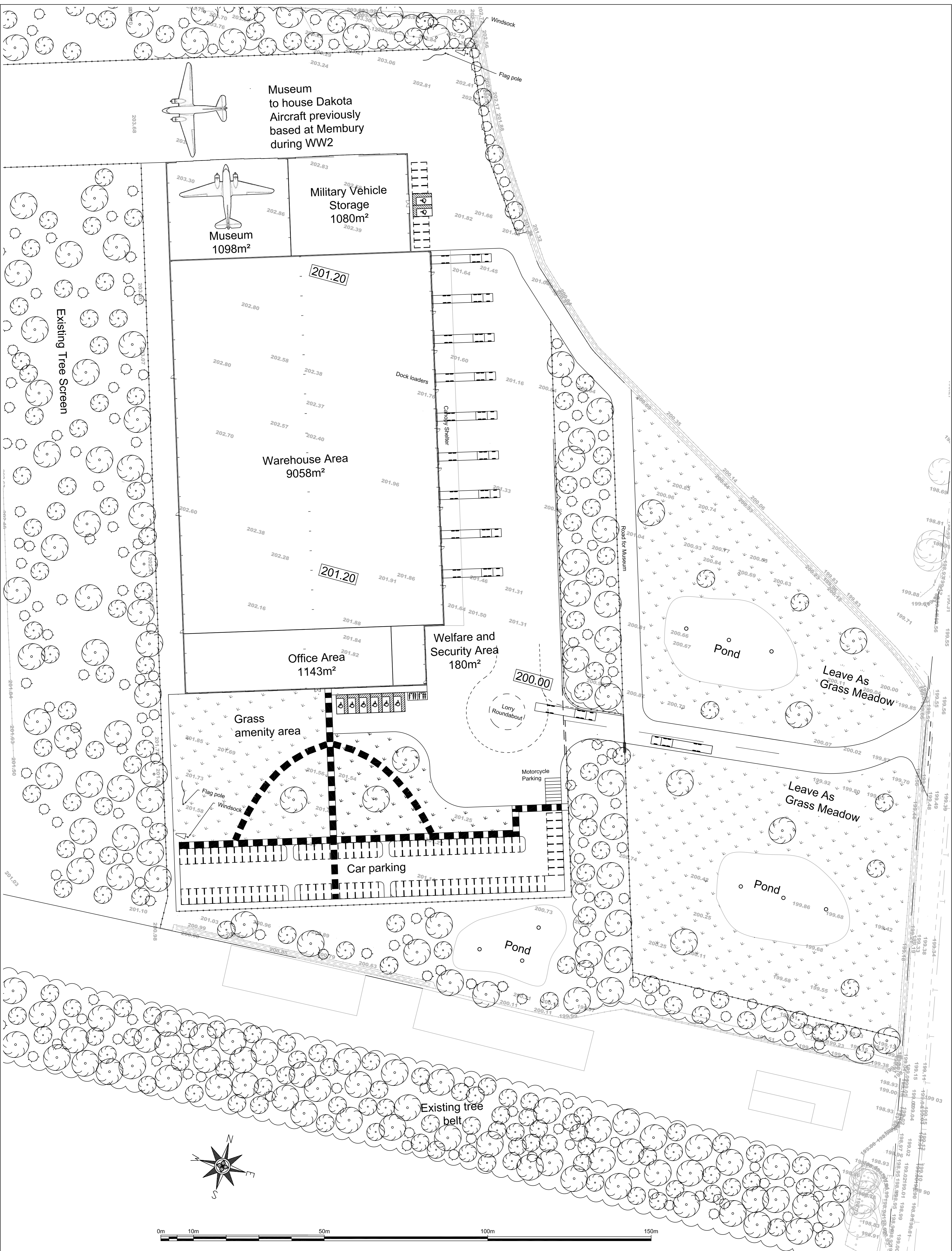
- Consideration of national, regional and local policy;
- An accessibility assessment of the site;
- Summary of development proposals;
- Summary of proposed access arrangements; and
- Assessment of the transport impact of the proposed development.

8.2 Given the scale and type of development proposed it is considered that a Travel Plan Statement is not required.

## 9. SUMMARY AND CONCLUSIONS

- 9.1 This PSN has been prepared by Paul Basham Associates on behalf of Trinity Grain Limited to identify the scope of work needed to support a planning application for a B8 land use comprising of 3,844m<sup>2</sup> open storage space, 132 shipping container storage units and a total of 12-parking spaces on the Land South of Trinity Grain, Membury.
- 9.2 The proposed development site is currently undeveloped and is located directly south of the existing Trinity Grain site, within the Membury Industrial Estate. The industrial estate is proposed for the allocation of an additional 27,600m<sup>2</sup> of employment floorspace within the emerging Local Plan, and B8 uses have recently been permitted on the adjacent Walker Logistics site.
- 9.3 While the site benefits from limited accessibility by sustainable modes, sustainable access to the site is possible. Given the proposed B8 use, the site is considered suitably accessible by sustainable modes.
- 9.4 The site would be accessed from the north, via the existing Trinity Grain site. Access to the Membury Industrial Estate is provided from the Ramsbury Road/ Industrial Estate Access Road junction which is set to benefit from improved visibility to the south as part of the Walker Logistics site access works.
- 9.5 A review of Personal Injury Accident data indicates that there have been no collisions resulting in personal injury that have occurred within the vicinity of the proposed site.
- 9.6 The proposed development would provide a total of 12 parking spaces comprised of two HGV spaces and 10-car spaces. This is consistent with both adopted and emerging local plan policy.
- 9.7 The proposed development would generate a small number of trips on a local road network which could comfortably accommodate the increase.
- 9.8 Agreement is sought from WBC that the principle of the development, the proposed access arrangements, and the anticipated transport impact is acceptable. Agreement is also sought from WBC on the proposed scope of a future Transport Statement.

## Appendix A



NUMBER - REV - CLIENT - PROJECT 03100-00 - D - Walker Logistics - Walker Logistics			
TITLE Block Plan			
DATE 09.08.19	SHEET 03	SCALE 1:500	
DRN BY CJB	CHK BY AW	PAPER SIZE <b>A1</b>	

Rev No	Revision Note	Date	Drawn	Checked
D	Draft removed, OS Map licence added to location plan	15.11.19	CJB	VW

**V B WHEELER**  
 BOURNE WORKS  
 COLLINGBOURNE DUCIS  
 MARLBOROUGH  
 WILTSHIRE  
 SN9 3EQ  
 Tel: 01264 850791  
 Email: vicwheeler75@gmail.com

## Appendix B



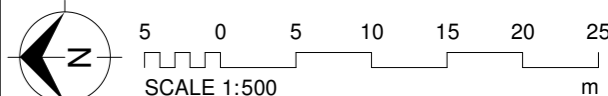
**Notes**

Do not scale from this document, unless for the purposes of planning applications where a scale bar is provided. Refer to figured dimensions only. All dimensions to be verified on site prior to construction. Report all discrepancies or ambiguities to the Document Originator immediately. This document is to be read in conjunction with relevant documents, drawings and standards.



Container Count
Number of Bays
132
Approximate number of containers subject to vehicle tracking

Rev	Date	Notes	Drn	Chk'd



Document Originator

**AWW**

London - 106 Weston Street, SE1 3QB 020 7160 6000  
 Plymouth - East Quay House, PL4 0HX 0117 923 2535  
 Bristol - pivot + mark, 48 - 52 Baldwin Street, BS1 1QB 01752 261 282  
 RIBA Chartered Practice www.aww-uk.com

Client  
 Trinity Grain

AWW Project Number 4551 Project Stage 2

Project Title  
 Trinity Grain  
 Membury

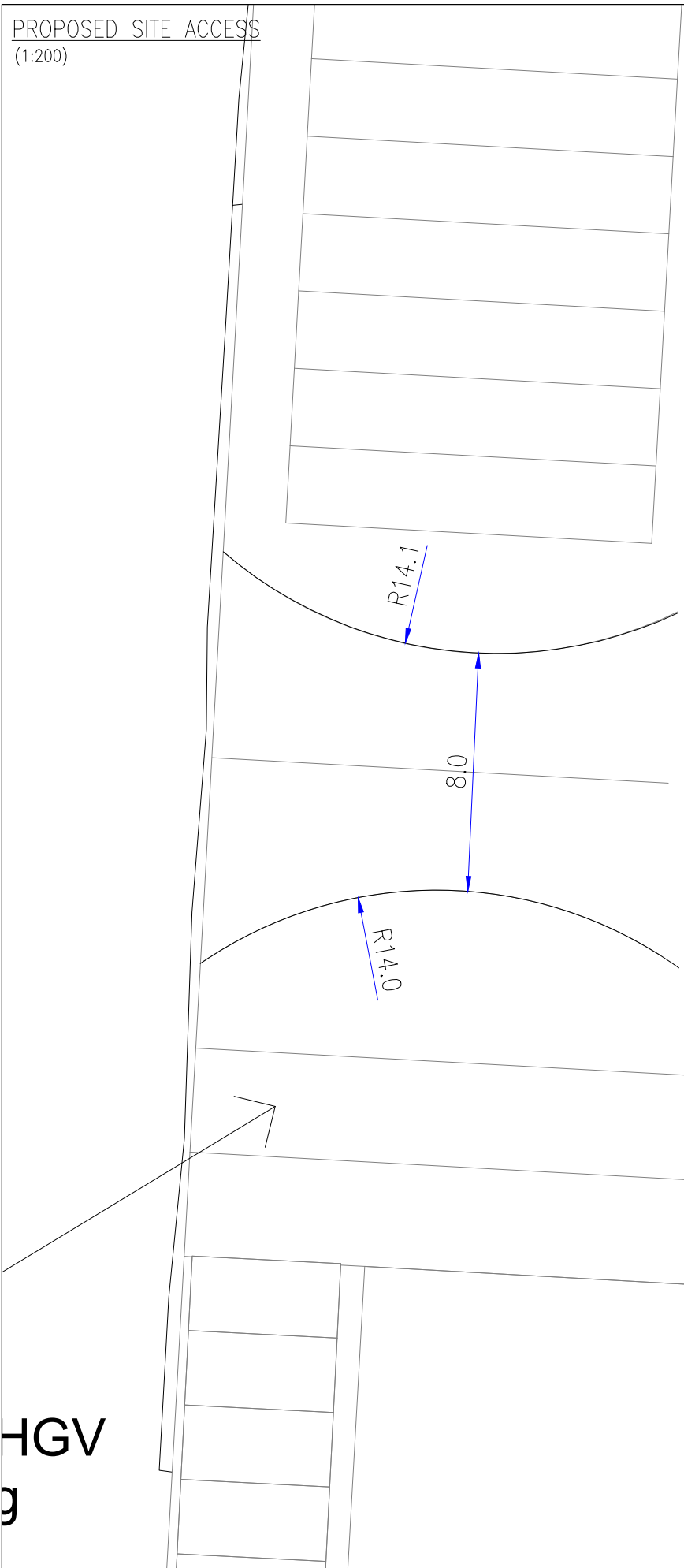
Title  
 Site Layout with Open Storage

Scale @ A2 Document Status  
 1 : 500

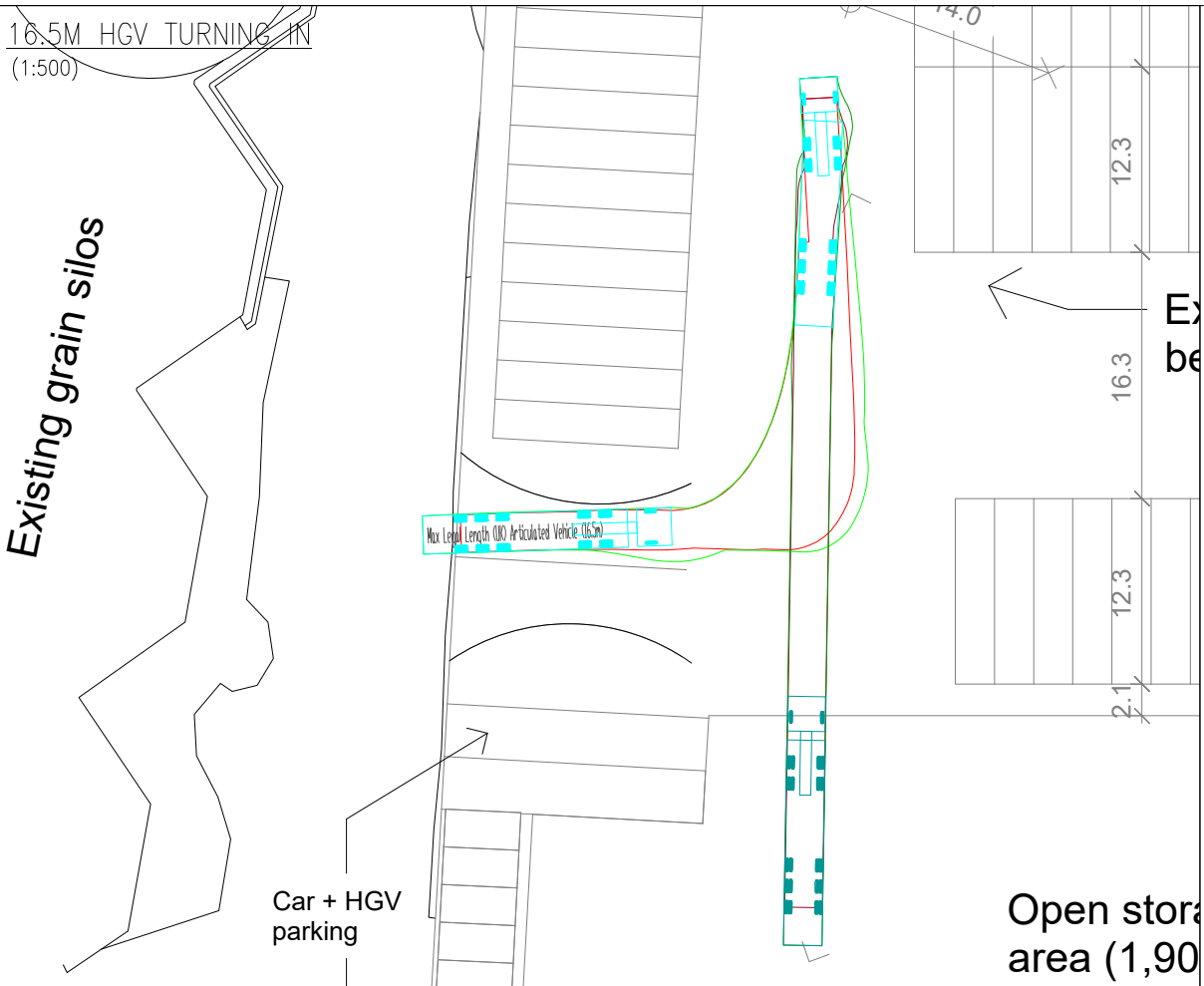
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## Appendix C

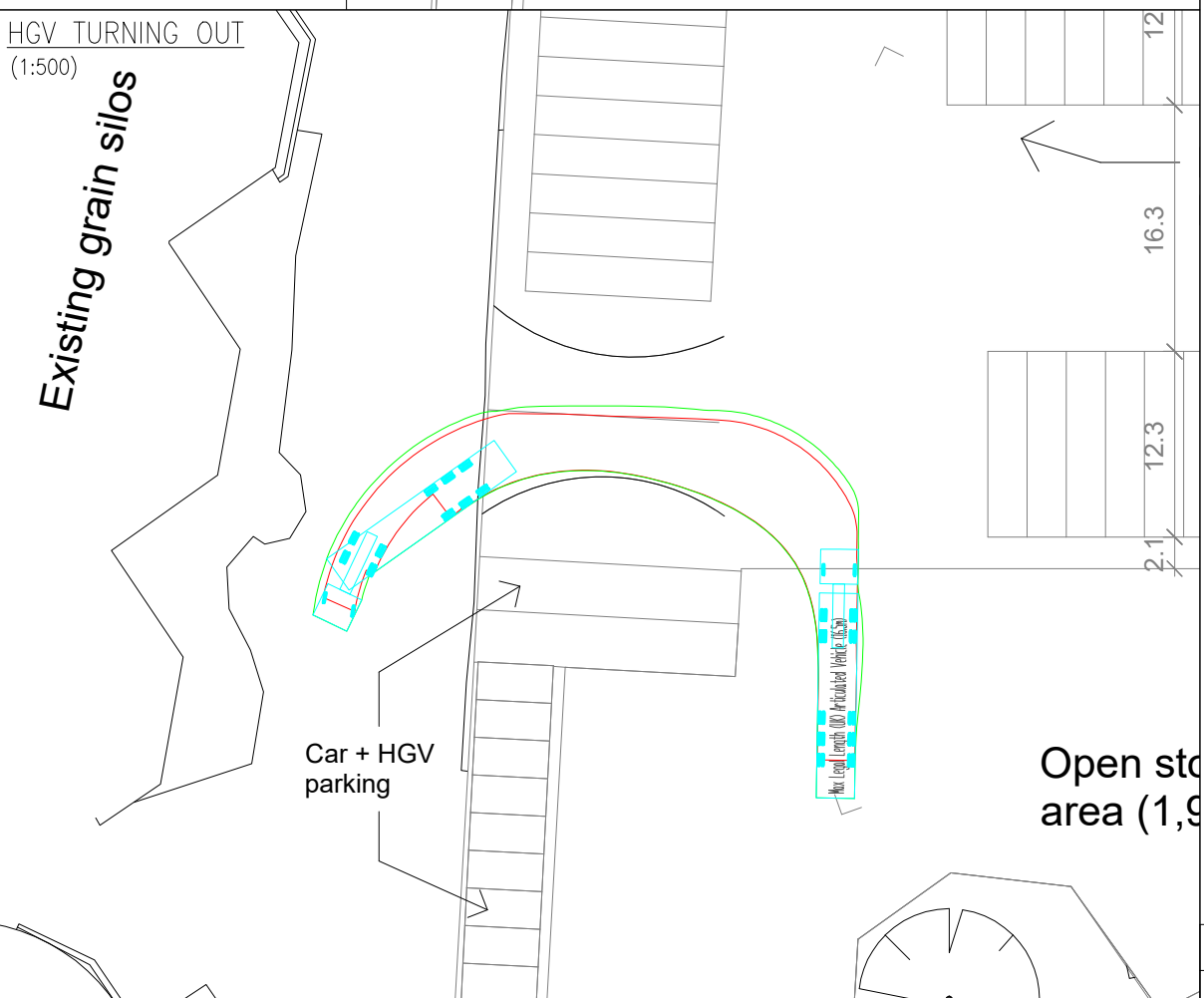
PROPOSED SITE ACCESS  
(1:200)



16.5M HGV TURNING IN  
(1:500)



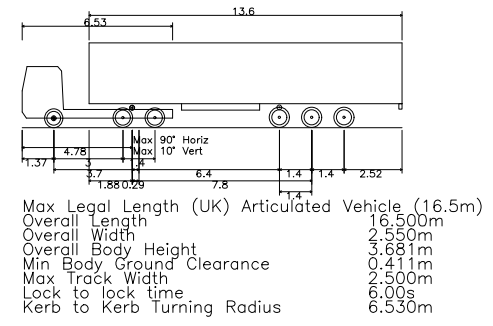
HGV TURNING OUT  
(1:500)



GENERAL NOTES

1. THIS DRAWING IS INTENDED TO BE VIEWED IN COMBINATION WITH ALL RELEVANT ARCHITECTS, ENGINEERS, SERVICES AND SPECIALIST DRAWINGS AND SPECIFICATION.
2. ANY VARIATIONS OR DISCREPANCIES BETWEEN THESE DRAWINGS IN TERMS OF DIMENSIONS OR DETAILS SHOULD BE DRAWN TO THE ATTENTION OF THE ARCHITECT AND/OR THE ENGINEER FOR CLARIFICATION.
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VEHICLE PROFILE:



HGV



Rev	Description	Date	By	Chkd
A	UPDATED SITE LAYOUT	27.09.22	DL	AST

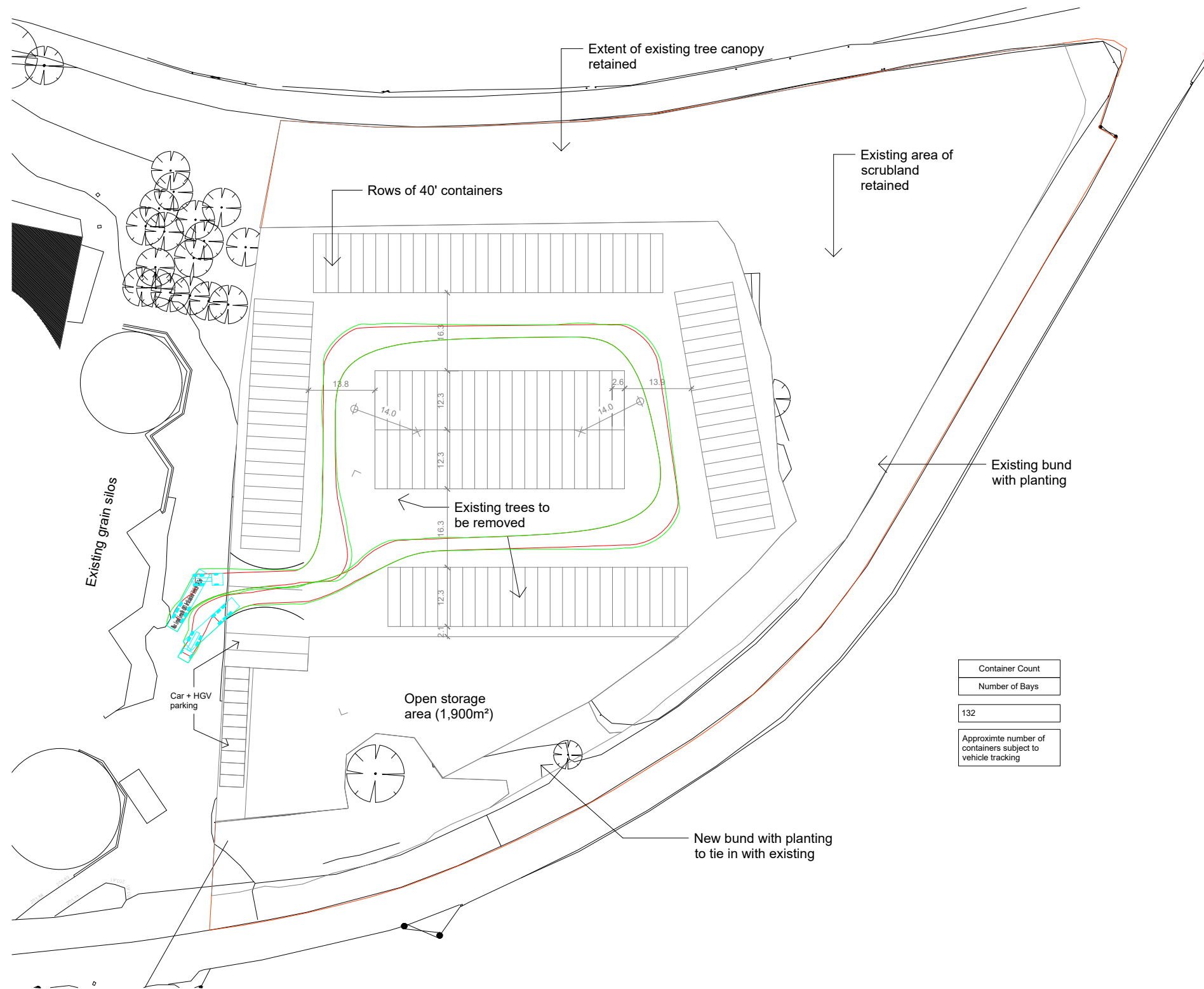
Project Name LAND SOUTH OF TRINITY GRAIN, MEMBURY	Title PROPOSED SITE ACCESS DIMENSIONS AND VEHICLE TURNING
Project Phase PRELIMINARY	

<p>Paul Basham Associates Ltd Regus Castlemead, Lower Castle Street, Bristol, BS1 3AG 01179 172610 info@paulbashamassociates.com www.paulbashamassociates.com</p>	<p>Client</p>
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Checked By AST	Checked Date 14.07.22	Scale INDIVIDUAL
Drawn By DL	Drawn Date 13.07.22	Client Drawing No. -

PBA Drawing No. 800.0051.001	Revision A
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(AT A3 SIZE)

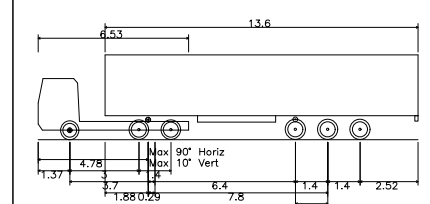


Container Count
Number of Bays
132
Approximate number of containers subject to vehicle tracking

**GENERAL NOTES**

1. THIS DRAWING IS INTENDED TO BE VIEWED IN COMBINATION WITH ALL RELEVANT ARCHITECTS, ENGINEERS, SERVICES AND SPECIALIST DRAWINGS AND SPECIFICATION.
2. ANY VARIATIONS OR DISCREPANCIES BETWEEN THESE DRAWINGS IN TERMS OF DIMENSIONS OR DETAILS SHOULD BE DRAWN TO THE ATTENTION OF THE ARCHITECT AND/OR THE ENGINEER FOR CLARIFICATION.
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**VEHICLE PROFILE:**



Max Legal Length (UK) Articulated Vehicle (16.5m)	16.500m
Overall Length	13.600m
Overall Width	2.550m
Overall Body Height	3.681m
Min Body Ground Clearance	0.411m
Max Track Width	2.500m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	6.550m



Rev	Description	Date	By	Chkd
A	UPDATED SITE LAYOUT	27.09.22	DL	AST

Project Name LAND SOUTH OF TRINITY GRAIN, MEMBURY	Title VEHICLE TRACKING AROUND SITE	<p>Paul Basham Associates Ltd Regus Castlemead, Lower Castle Street, Bristol, BS1 3AG 01179 175610 info@paulbashamassociates.com www.paulbashamassociates.com</p>	Client 	Checked By AST	Checked Date 14.07.22	Scale 1:1000	(AT A3 SIZE)		
Project Phase PRELIMINARY				Drawn By DL	Drawn Date 13.07.22	Client Drawing No. -	PBA Drawing No. 800.0051.002	Revision A	

## Appendix D

Calculation Reference: AUDIT-247601-220701-0730

## TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT  
 Category : E - WAREHOUSING (SELF STORAGE)  
 TOTAL VEHICLES

Selected regions and areas:

03	SOUTH WEST	
	WL WILTSHIRE	1 days
04	EAST ANGLIA	
	SF SUFFOLK	1 days
05	EAST MIDLANDS	
	NT NOTTINGHAMSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	1 days
09	NORTH	
	CB CUMBRIA	1 days
	TW TYNE & WEAR	1 days

*This section displays the number of survey days per TRICS® sub-region in the selected set*

## Primary Filtering selection:

*This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter: Gross floor area  
 Actual Range: 1350 to 5500 (units: sqm)  
 Range Selected by User: 1350 to 10000 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/14 to 15/10/21

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*

Selected survey days:

Monday	1 days
Tuesday	1 days
Wednesday	1 days
Thursday	2 days
Friday	1 days

*This data displays the number of selected surveys by day of the week.*

Selected survey types:

Manual count	6 days
Directional ATC Count	0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*

Selected Locations:

Suburban Area (PPS6 Out of Centre)	3
Edge of Town	3

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*

Selected Location Sub Categories:

Industrial Zone	4
Development Zone	1
No Sub Category	1

*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.*

Secondary Filtering selection:

Use Class:

B8 6 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.*

Filter by Site Operations Breakdown:

All Surveys Included

Population within 500m Range:

All Surveys Included

Population within 1 mile:

5,001 to 10,000	1 days
10,001 to 15,000	2 days
15,001 to 20,000	1 days
25,001 to 50,000	2 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

Population within 5 miles:

5,001 to 25,000	1 days
75,001 to 100,000	1 days
125,001 to 250,000	2 days
250,001 to 500,000	1 days
500,001 or More	1 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.6 to 1.0	2 days
1.1 to 1.5	3 days
1.6 to 2.0	1 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

No 6 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*

PTAL Rating:

No PTAL Present 6 days

*This data displays the number of selected surveys with PTAL Ratings.*

Covid-19 Restrictions	Yes	At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions
-----------------------	-----	--

LIST OF SITES relevant to selection parameters

1	CB-02-E-01 MILLBROOK ROAD CARLISLE KINGSTOWN IND. ESTATE Edge of Town Industrial Zone Total Gross floor area: <i>Survey date: FRIDAY</i>	BOX CLEVER SELF STORAGE      3100 sqm 15/10/21	CUMBRIA         <i>Survey Type: MANUAL</i>
2	NT-02-E-02 LENTON LANE NOTTINGHAM  Suburban Area (PPS6 Out of Centre) Development Zone Total Gross floor area: <i>Survey date: THURSDAY</i>	BIG YELLOW SELF STORAGE      2860 sqm 17/11/16	NOTTINGHAMSHIRE         <i>Survey Type: MANUAL</i>
3	NY-02-E-01 OAKNEY WOOD ROAD SELBY  Edge of Town Industrial Zone Total Gross floor area: <i>Survey date: TUESDAY</i>	SELF STORAGE      1350 sqm 21/09/21	NORTH YORKSHIRE         <i>Survey Type: MANUAL</i>
4	SF-02-E-01 WHITE HOUSE ROAD IPSWICH  Edge of Town Industrial Zone Total Gross floor area: <i>Survey date: THURSDAY</i>	SELF STORAGE      1530 sqm 24/06/21	SUFFOLK         <i>Survey Type: MANUAL</i>
5	TW-02-E-01 STONEYGATE CLOSE GATESHEAD  Suburban Area (PPS6 Out of Centre) Industrial Zone Total Gross floor area: <i>Survey date: MONDAY</i>	1ST STORAGE      5500 sqm 13/06/16	TYNE & WEAR         <i>Survey Type: MANUAL</i>
6	WL-02-E-01 DRAKES WAY SWINDON  Suburban Area (PPS6 Out of Centre) No Sub Category Total Gross floor area: <i>Survey date: WEDNESDAY</i>	BIG YELLOW SELF STORAGE      4925 sqm 21/09/16	WILTSHIRE         <i>Survey Type: MANUAL</i>

*This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.*



TRIP RATE for Land Use 02 - EMPLOYMENT/E - WAREHOUSING (SELF STORAGE)

TOTAL VEHICLES

Calculation factor: 100 sqm

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	3211	0.057	6	3211	0.031	6	3211	0.088
08:00 - 09:00	6	3211	0.109	6	3211	0.078	6	3211	0.187
09:00 - 10:00	6	3211	0.187	6	3211	0.151	6	3211	0.338
10:00 - 11:00	6	3211	0.171	6	3211	0.176	6	3211	0.347
11:00 - 12:00	6	3211	0.130	6	3211	0.109	6	3211	0.239
12:00 - 13:00	6	3211	0.213	6	3211	0.218	6	3211	0.431
13:00 - 14:00	6	3211	0.140	6	3211	0.119	6	3211	0.259
14:00 - 15:00	6	3211	0.161	6	3211	0.176	6	3211	0.337
15:00 - 16:00	6	3211	0.145	6	3211	0.161	6	3211	0.306
16:00 - 17:00	6	3211	0.114	6	3211	0.119	6	3211	0.233
17:00 - 18:00	6	3211	0.057	6	3211	0.135	6	3211	0.192
18:00 - 19:00	6	3211	0.026	6	3211	0.031	6	3211	0.057
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.510			1.504			3.014

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is:  $COUNT/TRP*FACT$ . Trip rates are then rounded to 3 decimal places.

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#### Parameter summary

Trip rate parameter range selected:	1350 - 5500 (units: sqm)
Survey date date range:	01/01/14 - 15/10/21
Number of weekdays (Monday-Friday):	6
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

*This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.*

**PRE-APPLICATION  
ENQUIRY PLANNING  
STATEMENT**

---

**USE OF LAND FOR B8  
STORAGE AND  
DISTRIBUTION (OPEN  
STORAGE) INCLUDING  
THE SITING OF  
STORAGE  
CONTAINERS AND  
ASSOCIATED  
PARKING**

**LAND TO THE SOUTH OF TRINITY GRAIN,  
MEMBURY**

**TRINITY GRAIN**

**Wednesday, 21 December 2022**

**Carter Jonas**



**Date: Wednesday, 21 December 2022**

**Client: Trinity Grain Ltd**

**Client or Job Number: J0052633**

**Contacts: Willow Mercer MRTPI**

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Berkeley Place  
Bristol  
BS8 1BQ  
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## CONTENTS

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## EXECUTIVE SUMMARY

Trinity Grain Limited is a grain storage, processing company and is currently marketing over 200,000 tonnes of combinable crops for 300 members in the South of England. The company came about from the merger of three previously, very successful farmer owned cooperatives that had operated in the area for over 40 years: Ridgeway Grain Limited, Wiltshire Grain Limited and Hampshire Grain Limited.

Trinity Grain at Lambourne Woodlands, Membury has capacity for 37,000 tonnes of grain in 24 silos, 19,000 tonnes in 2 flat stores, 2,400 tonnes in 16 holding and pre-store bins and 600 tonnes in storage bunker.

The land to the south of the silos is currently rough grassland. There is a small compound located centrally in the site used by Kerb King Recovery as their base of operations.

The proposal comprises the change of use of land for B8 storage and distribution (open storage) including the siting of storage containers and associated parking. Enhanced landscaping is proposed. The proposal will be for open market use, and not specific to the needs to Trinity Grain however will act as another important source of income for the business.

## 1. INTRODUCTION

- 1.1 Carter Jonas is instructed by Trinity Grain Limited (hereafter referred to as ‘Trinity Grain’) to prepare and submit a pre-application enquiry to West Berkshire Council (‘WBC’) for the proposed development of land to the south of Trinity Grain, Lambourne Woodlands (hereafter referred to as ‘the Site’). The description of development (‘the proposed development’) is as follows:

*“Use of land for B8 storage and distribution (open storage) including the siting of storage containers and associated parking.”*

- 1.2 This pre-application planning statement provides a description of the proposed development as well as reasoned justification as to why the application should be permitted if a full planning application was forthcoming. This statement makes reference to the proposed development in relation to its site context, planning history and all relevant parts of the Local and National Planning Policy Framework.
- 1.3 Trinity Grain welcome WBC’s opinion on the acceptability of the principle of development, the technical matters discussed, and any other relevant technical matters WBC deems appropriate. We have provided a list of deliverables which we expect would be required with a full planning application and request WBC’s opinion on this matter.
- 1.4 The following documents are submitted in support of this pre-application enquiry planning application:

Table 1: Supporting Document and Plan List

Document	Author
Landscape Strategy	Nicholas Pearson Associates
Preliminary Ecological Appraisal	Nicholas Pearson Associates
Preliminary Landscape Visual Appraisal	Nicholas Pearson Associates
Pre-application Transport Scoping Note	Paul Basham Associates
Site Layout	AWW

## 2. THE APPLICATION SITE AND SURROUNDINGS

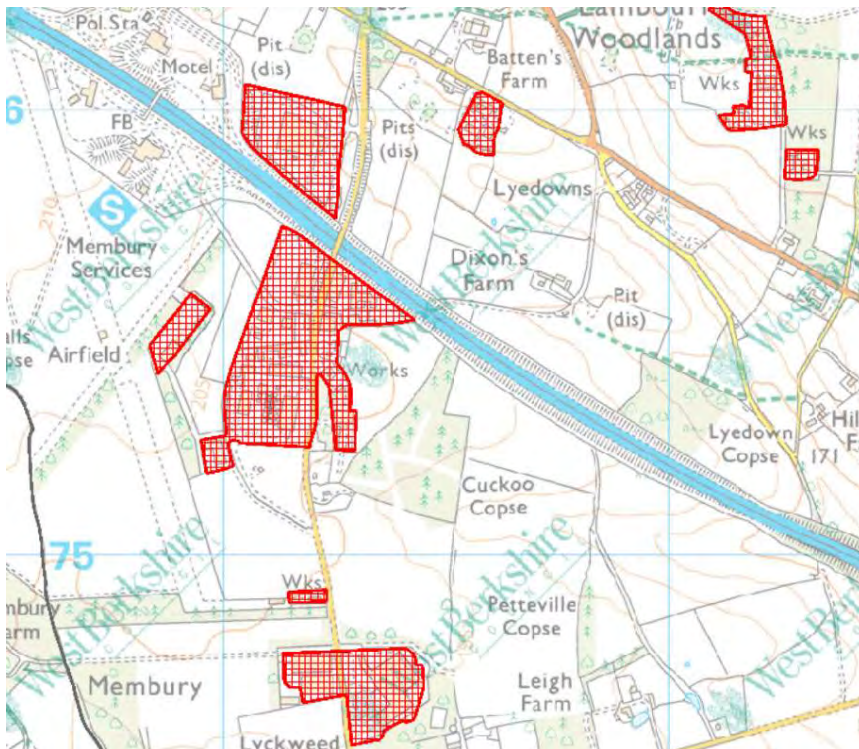
- 2.1 The Site falls within the administrative boundary of West Berkshire and to the south of Membury Motorway Services (westbound). Membury Motorway Services are located on the M4 corridor, an arterial route between London and the Southwest and Wales. The Site is nestled between a number of other commercial buildings and compounds as well as the buildings associated with Trinity Grain. There are also residential properties close by on Ramsbury Road.
- 2.2 The Site extends to approximately 2.2 hectares. It is a triangular shaped site which forms scrub and grassland. The east, west and southern boundary of the Site is met by a raised bund and dense vegetation including tree planting. Ramsbury Road is located to the east of the Site and is an adopted highway. To the east of Ramsbury Road are two residential properties.
- 2.3 To the west of the Site is an unadopted access road which leads north through the industrial estate. The unadopted access road is split into two ownerships. The eastern half is in the ownership of the applicant. The ownership of the western side is currently unknown. The road is split down the middle by a steel crash barrier.



- 2.4 The unadopted access road leads north to two access points into the site. The first one leads to a fenced compound which is occupied by a number of shipping containers. The compound is used by Kerb King Recovery as their base of operations. Further north there is a secondary access which leads to the grain silos which form the northern boundary of the Site.
- 2.5 The summary below provides an overview of the key site constraints and opportunities:
- The Site is location in Flood Zone 1, which has the lowest probability of flooding.
  - The Site is located within the North Wessex Downs AONB.
  - The Site is located within a SSSI risk impact zone.
  - The Site is immediately adjacent to a Protected Employment Area ('PEA').
  - Previous planning applications in relation to the existing Trinity Grain operations (ref: 08/01881/FUL and 12/01975/COMIND) noted native tree and shrub planting on the Site.
  - A recent consent on land to the south of the Site has been achieved for B8 Storage and Distribution use(19/02979/OUTMAJ). This is also outside of the PEA.
  - The emerging West Berkshire Local Plan seeks to expand the PEA at Ramsbury Road.

## Surrounding Uses

- 2.6 The Principal Employment Area (PEAs) as defined in the WBC Local Plan is limited to a small area within the wider industrial estate as demonstrated on the map below:



*Extract from West Berkshire Online Maps (Plan not to scale)*

- 2.7 However, since the adoption of the Local Plan and the allocation of the PEA, there has been several approved planning consents near to, but outside of the PEA.

- 2.8 19/02979/OUTMAJ which formed an outline application for the erection of a new logistics warehouse building (for occupation by Walker Logistics) (Use Class B8) with ancillary office floorspace, an aircraft museum building (Use Class D1), and associated access, car parking and landscaping and was approved May 2021. This application is located to the west of the site and is outside the existing PEA.
- 2.9 18/01320/COMIND which formed the change of use of land for B8 storage and distribution; erection of workshop building; landscaping and associated works and was approved in July 2018. This application is located to the north of Trinity Grain and is outside the existing PEA.
- 2.10 21/03083/COMIND which formed change of use of land to Class B8 and was approved in September 2022. 18/01320/COMIND which formed a change of use of land for B8 storage and distribution; erection of workshop building; landscaping and associated works was approved in July 2018. These comprise the area of land to the northwest of Trinity Grain site and is outside the existing PEA.
- 2.11 As a result of the nearby decisions there has been a material change in the practical extent of the employment area. This is reflected and supported by the emerging local plan policy which seeks to expand the PEA policy designation to include a larger area.

## 3. PLANNING HISTORY AND BACKGROUND

### Call for Sites 2021

- 3.1 The Site was submitted to West Berkshire Call for Sites in December 2021.

### Planning History

- 3.2 The Site itself has a very limited planning history. Of most relevance is 07/02754/COMIND for the erection of 6 grain storage silos and 1 loading hopper on the Trinity Grain land to the north. This resulted in the erection of the existing grain silos. The Site was included as land for mitigating the impact of the grain silos on the wider landscape.
- 3.3 There have been several recent applications approved on adjacent sites both within and outside of the PEA which now fundamentally change the landscape in which the Silos sit. These have been summarised in paragraph 2.8 – 2.11.

## 4. THE PROPOSED DEVELOPMENT

- 4.1 The Site layout plan submitted with this application demonstrates the following:
- 132 40 ft containers.
  - 1,900m<sup>2</sup> of open storage area.
  - 10 car parking spaces and 2 HGV bays.
  - Closure of existing access to centre of the Site and completion/infill of bund.
  - Retention of existing bund and scrubland to the south.
  - Existing tree canopy to east retained and bund removed.
  - Sufficient circulation space for HGVs.
  - Trees removed from centre of the Site.
- 4.2 Offsite vegetation to northeast retained.

## 5. PLANNING POLICY

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Site is located in West Berkshire's remit for the determination of planning applications and therefore the West Berkshire Core Strategy Development Plan Document (2006-2026), Housing Site Allocations Development Plan Document (2006-2026) and West Berkshire District Local Plan (1991-2006) Saved Policies (2007) form the Development Plan. Other material considerations are:

- National Planning Policy Framework (NPPF, July 2021) and the National Planning Practice Guidance (NPPG, March 2014);
- North Wessex Downs AONB Management Plan 2019-2024;
- Replacement Minerals Local Plan for Berkshire; and
- Waste Local Plan for Berkshire.

5.2 It is also important to consider relevant emerging policies such as:

- Emerging Minerals and Waste Local Plan; and
- Emerging West Berkshire Local Plan Review to 2037

### **National Planning Policy Framework (NPPF, July 2021)**

5.3 The Government published the amended National Planning Policy Framework (NPPF) on 19 February 2019. This was subsequently updated on 19 June 2019 and updated a further time in July 2021. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The policies contained in the NPPF are material considerations which should be considered in decision making.

5.4 The purpose of the planning system is to contribute to the achievement of sustainable development, with the three overarching objectives including economic, social and environmental. To ensure that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development.

5.5 At paragraph 11 the NPPF sets out the presumption in favour of sustainable development and states that development which accords with an up-to-date development plan should be approved without delay.

5.6 At paragraph 38 the NPPF states that decision-makers at every level should seek to approve applications for sustainable development.

5.7 Paragraph 81 states that 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, considering both local business needs and wider opportunities for development.

5.8 Paragraph 85 adds that the use of previously developed land and sites that are physically well-related to existing settlements should be encouraged where suitable opportunities exist.

5.9 The NPPF requires proposals to promote sustainable patterns of travel through increased opportunities for walking, cycling and public transport use. Key to this is directing development to locations with good access to services and facilities to minimise the need to travel by car (paragraphs 104, 105, 110 and 112).

- 5.10 At paragraph 119 the NPPF states that planning decisions should promote the effective use of land to meet identified needs for growth. At paragraph 130 it advises that the development potential of sites should be optimised to accommodate and sustain an appropriate level of development and to support local facilities and transport networks.
- 5.11 Paragraph 174 highlights the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It states that the planning system should contribute to and enhance the natural and local environment by:
- 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).
  - minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 5.12 The NPPF states at paragraph 176 that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. Paragraph 177 advises that 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. Paragraph 177 goes on to explain that 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.
- 5.13 The NPPF is supplemented by extensive national guidance on a wide range of technical issues. However, these are not considered in detail here.

## Local Planning Policy Framework

- 5.14 The West Berkshire Core Strategy Development Plan Document (2006-2026) (DPD) sets out a long term vision for West Berkshire to 2026. Some of the policies contained in the previous Local Plan have been saved and will remain in force until replaced by the Site Allocations and Delivery DPD.
- 5.15 Area Delivery Plan Policy 5, North Wessex Downs Area of Outstanding Natural Beauty states that the Protected Employment Areas (PEAs) within the AONB will continue to play a vital role in supporting the local economy, especially those in edge of centre locations. The role, function and boundaries of these PEAs have been reviewed through the Site Allocations and Delivery DPD. Small, local businesses will be supported, encouraged and protected within the AONB providing local job opportunities and maintaining the rural economy.
- 5.16 Policy CS9 Location and Type of Business Development sets out that the LPA will facilitate and promote the growth and forecasted change of business development including retaining a portfolio of sites for B8 uses in suitable locations. Proposals for industry, distribution and storage uses will be directed to the District's defined PEAs. PEAs are parcels of land throughout the District designated for B uses. A range of types and sizes of employment sites and premises will be encouraged throughout the District to meet the needs of the local economy.

- 5.17 Policy CS10 Rural Economy set out that proposals to diversify the rural economy will be encouraged, particularly where they are located in or adjacent to Rural Service Centres and Service Villages. Existing small and medium sized enterprises within the rural areas will be supported in order to provide local job opportunities and maintain the vitality of smaller rural settlements.
- 5.18 Policy CS13 Transport sets out the policy context for dealing with development that generates a transport impact including reducing the need for travel and promoting sustainable travel.
- 5.19 Policy CS14 Design Principles confirms that new development must demonstrate high quality and sustainable design that respects and enhances the character and appearance of the area. The Policy sets out what development proposals are expected to do, and this includes making efficient use of land whilst respecting the density, character, landscape and biodiversity of the surrounding area, consider opportunities for a mix of uses, buildings and landscaping and provide, conserve and enhance biodiversity and create linkages between green spaces and wildlife corridors. The Policy also confirms that all development proposals will be expected to seek to minimise carbon dioxide emissions through sustainable design and construction, energy efficiency, and the incorporation of renewable energy technology as appropriate and in accordance with Policy CS15: Sustainable Construction and Energy Efficiency.
- 5.20 Policy CS15 Sustainable Construction and Energy Efficiency confirms that new non-residential development will meet the following minimum standards of construction:
- Minor development - BREEAM Very Good
  - Major development - BREEAM Excellent
  - From 2013: All development - BREEAM Excellent
- 5.21 Major development shall achieve the following minimum reductions in total CO2 emissions (regulated and unregulated energy use) from renewable energy or low/zero carbon energy generation on site or in the locality of the development as long as a direct physical connection is used, unless it can be demonstrated that such provision is not technically or economically viable.
- 5.22 CS15 also requires that non-residential development achieves, from 2019, a Zero Carbon development.
- 5.23 Policy CS16 Flooding confirms that development will require a Flood Risk Assessment for Sites of 1 ha or more in Flood Zone 1. The Site is in Flood Zone 1.
- 5.24 Policy CS17 Biodiversity and Geodiversity sets out that in order to conserve and enhance the environmental capacity of the District, all new development should maximise opportunities to achieve net gains in biodiversity and geodiversity in accordance with the Berkshire Biodiversity Action Plan and the Berkshire Local Geodiversity Action Plan.
- 5.25 Policy CS19 Historic Environment and Landscape Character confirms that in order to ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, the natural, cultural, and functional components of its character will be considered as a whole.

## **The North Wessex Downs AONB Management Plan (2019-2024)**

- 5.26 The North Wessex Downs AONB Management Plan 2019-2024 sets out the vision and long term plan for the AONB as well as how this will be implemented and monitored. It is a material consideration for the determination of any planning application in the AONB.
- 5.27 Chapter 7 sets out the theme of 'Development within the AONB'. The North Wessex Downs AONB Partnership supports pre-application discussions from applicants and with the relevant Local Planning

Authorities and believes that promoting and supporting local enterprise is a key part of conserving and enhancing the character and special qualities of the AONB.

5.28 Key issues with the potential to have significant influence on the AONB's Development Special Qualities are raised on page 79 of the Management Plan. The following two are particularly relevant to the Site:

j) Unsuitable development of redundant previously developed and part-developed sites within the North Wessex Downs, especially redundant airfields and military sites (e.g. Wroughton), and the impact upon landscape quality and heritage assets.

k) New developments at the junction of the M4 and A34 or along their corridors which spread the impact from development yet further into the undeveloped parts of the AONB.

### **West Berkshire Emerging Local Plan Review (2020-2037)**

5.29 On December 1<sup>st</sup>, at Full Council West Berkshire agreed to progress with Regulation 19 public consultation on the Emerging Local Plan Review. This consultation is scheduled for January 2023. The below commentary refers to the Emerging Local Plan Review

5.30 Policy SP2 - North Wessex Downs AONB, sets out the strategy for the AONB and is consistent with the NPPF 2021.

5.31 Policy SP6 – Flooding, sets out that proposed development will require a site specific Flood Risk Assessment (FRA) on development sites greater than 1ha in size if located in Flood Zone 1.

5.32 Policy SP8 - Landscape Character, sets out that landscape led development which conserves and enhances the diversity and local distinctiveness of the landscape character of the District will be supported. Proposals for development should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and IEMA.

5.33 Policy SP11 - Biodiversity and Geodiversity, sets out that development proposals will conserve and enhance biodiversity and/or geodiversity and will achieve a minimum 10% net gain for biodiversity, either within the site boundary or as part of on-site compensation, or where agreed, off-site compensation towards more strategic nature recovery.

5.34 Policy SP20 - Strategic Approach to Economic Development and Hierarchy of Centres, seeks to facilitate the growth and forecasted business development over the plan period. This will be achieved through the creation of new Designated Employment Areas (DEAs) and extensions to existing DEAs.

5.35 Policy SP21 – proposes the extension of existing Designated Employment Areas (DEAs) for industrial, storage and distribution uses. This policy introduces a new allocation under Policy Reference ESA3 Land to the South of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands which refers to the site covered by this pre-application seeks to allocate approximate 5,200m<sup>2</sup> of E (g) (iii) / B2 (Industrial processes / General Industrial).

5.36 The policy sets out a number of parameters for the allocation. These parameters have not had due regard to sites constraints and this pre-application enquiry document and supporting technical information. The table below provides an overview of the parameters in the draft allocation balanced against the pre-application scheme.

Parameter in Draft Allocation	Pre-application Enquiry Scheme
5,200m2 of E (g) (iii) / B2	<p>The pre-application scheme proposes B8 storage and distribution (open storage). This aligns with other nearby uses, allows for development which has a low impact on the landscape (i.e., does not include tall buildings), and can be delivered on the site without prejudicing a future use in E (g) (iii) or B2 coming forward.</p> <p>The proposed pre-application scheme use class is considered suitable for the site.</p>
Access from Ramsbury Road	<p>The highway and access investigation has concluded that the most suitable access would be from Ramsbury Road, where it meets the southern tip of the site, looping north and access being provided at the existing access point just south of the silos. The draft allocation policy map indicates that access should be from the centre of the wider Trinity Grain site.</p> <p>This would not be feasible as this would result in a conflict of movements between Trinity Grain vehicles and the future occupiers of the draft allocation site.</p> <p>The proposed pre-application scheme access is considered safer and more appropriate.</p>
Transport Assessment Required/Travel Plan Required.	A Transport Scoping Note has been provided with the pre-application. A Transport Assessment and Travel Plan will be provided with a future planning application.
<p>In accordance with Landscape Sensitivity and Capacity Assessment (2022) for Site 2: South of Trinity Grain</p> <ul style="list-style-type: none"> <li>- Retain tree belt, hedgerow and woodland copse.</li> <li>- Height must not be visible above silos/tree canopy or from Ramsbury Road.</li> </ul>	<p>As part of the pre-application a preliminary Landscape Visual Appraisal has been provided. A Landscape Strategy has also been provided which identifies where landscaping can be retained and enhanced, and this largely accords with the parameters of the draft allocation.</p> <p>The proposed height of the pre-application scheme is low. The shipping containers fall well below the tree canopy as a result is in accordance with the parameters of the draft allocation.</p>
Informed by Landscape Visual Impact Appraisal	As part of the pre-application a preliminary Landscape Visual Appraisal has been provided. A Landscape Visual Impact Appraisal will be provided with a Full Planning Application
Informed by Ecological Impact Assessment	<p>As part of the pre-application enquiry a Preliminary Ecological Appraisal has been provided. This is the first part of any EclA. A full planning application may require an EIA screening opinion to be requested due to the scale of the proposal within a sensitive area (Schedule 2<sup>1</sup>, 10 (a) Industrial estate development projects where the development exceeds 0.5 hectares)</p> <p>This will be submitted when a Full Planning Application is progressed.</p>

<sup>1</sup> The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Informed by Heritage Impact Assessment	A Heritage Impact Assessment will be prepared as part of a Full Planning Application
Informed by Flood Risk Assessment	A Flood Risk Assessment will be prepared as part of a Full Planning Application
Respond positively to challenge of climate change.	A Full Planning Application will consider this.

5.37 Policy SP22 – Transport, sets out that non-residential developments will be required to prepare Transport Assessments or Transport Statements (as appropriate) in support of the proposed development.

5.38 Policy DC32 - Designated Employment Areas, sets out that employment uses will continue to be focused within the District’s DEAs (as defined on the Policies Map). Planning permission for small scale commercial and service uses within DEAs will only be permitted where it can be demonstrated that they are complementary to the existing business use in that location and consistent with the integrity and function of the location for employment uses.

## 6. PLANNING ASSESSMENT

### Principle of Development

6.1 The Site is outside of the Protected Employment Area (‘PEA’) but adjacent to its boundary. The adopted local plan provides some policy support for certain types of development in the AONB. However, according to Core Strategy Policy ADPP5 this is limited to “small scale renewable energy schemes, which use local resources” provided they can be accommodated within the landscapes of the North Wessex Downs and limited to development to support small and local businesses.

6.2 Core Strategy Policy CS9 and its supporting text also provides some policy support, in some circumstances, for new employment generating schemes adjacent to PEAs. The Policy reads:

*(a) The appropriate location of business development:*

*Proposals for industry, distribution and storage uses will be directed to the District’s defined Protected Employment Areas and existing suitably located employment sites and premises.*

*Any proposals for such uses outside these areas/locations will be assessed by the Council against the following:*

- *compatibility with uses in the area surrounding the proposals and potential impacts on those uses; and*
- *capacity and impact on the road network and access by sustainable modes of transport.*

6.3 Policy CS9 goes on to say that proposals for employment generating uses within PEAs are considered acceptable subject to compliance with other policies within the plan.

6.4 The Site is located adjacent to an existing established and allocated employment site. In the emerging Local Plan Review, the Site is proposed to be allocated as an expanded employment site to contribute to the much needed employment land in the authority. The emerging Local Plan seeks to expand the PEAs (however, renames them DEAs) and as a result the Membury Industrial Estate role as a provider of employment in the area is reinforced.



- 6.5 The proposed development allows Trinity Grain to diversify their business and continue to ensure that they remain a local employer in the future.
- 6.6 Therefore, in principle and subject to considering other policies within the Local Plan, there is policy support for employment (B use class) development in this location. Furthermore, the emerging Local Plan seeks to allocate the site for E (g) (iii) or B2.

## **Impact on the North Wessex Downs AONB**

- 6.7 A Landscape Visual Appraisal (LVA) has been undertaken by Nicholas Pearson Associates to inform the development proposals.
- 6.8 The Site falls within Landscape Character Area 2C Lambourn Wooded Downs (of the AONB Management Plan) within landscape character area WD1: Shefford Wooded Downland (of the West Berkshire Landscape Character Assessment).
- 6.9 Other than the adjacent public highways there are no Public Rights of Way in the immediate or local vicinity of the Site. The nearest public footpaths are circa 500m to the east (ref: LAMB/18/2) and circa 650m to the south (ref. LAMB/37/1).
- 6.10 As the LVA sets out, the Site comprises a very well contained area of previously altered land, not subject to any current use, set within the context and influence of various commercial and industrial land uses adjacent to the M4 corridor. Whilst its location with the AONB is noted, with associated landscape values, the Site and the adjacent industrial/commercial context does not exhibit the elements of rurality and tranquillity which defines the wider landscape<sup>2</sup>.
- 6.11 The LVA also sets out that the extent of local woodland was considerable which substantially restricted views of/toward the Site<sup>3</sup>. Overall views of the Site are very limited by the extent and location of intervening vegetation and built form. When visible, such views are from the immediate vicinity to the east, north east and south along Ramsbury Road. These views comprise the vegetation along the eastern and southern boundary of the Site<sup>4</sup>.
- 6.12 The LVA sets out several elements to mitigate the impact from the proposal, these are set out at paragraph 5.2 of the LVA.
- 6.13 The LVA concludes that whilst further assessment of a final scheme would be required, at this stage it seems likely that there would be no material effect on the wider AONB including that associated with the special landscape qualities and values associated its rural, wooded and tranquil character<sup>5</sup>.
- 6.14 It also concludes that it is likely that visual effects will be very limited and contained to the immediate vicinity of the Site, with only limited/glimpsed views of the storage area available from Ramsbury Road to the east<sup>6</sup>.
- 6.15 Paragraph 177 (NPPF 2021) confirms that applications for major development in an AONB should be refused permission other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Footnote 60 confirms that for the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker, taking into account

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<sup>2</sup> Paragraph 3.9, LVA, Nicholas Pearson Associates (September 2022)

<sup>3</sup> Paragraph 4.2, LVA, Nicholas Pearson Associates (September 2022)

<sup>4</sup> Paragraph 4.8, LVA, Nicholas Pearson Associates (September 2022)

<sup>5</sup> Paragraph 6.4, LVA, Nicholas Pearson Associates (September 2022)

<sup>6</sup> Paragraph 6.9, LVA, Nicholas Pearson Associates (September 2022)

its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

- 6.16 The proposed development involves limited built form and the Site is well screened with dense vegetation and a bund. The LVA concludes that there is likely to be limited impact on visual effects and no material impact on the wider AONB. In the absence of a definition of 'major development' and taking in to account the proposal's nature, scale and setting, it is not considered that the proposal could feasibly comprise 'major development'. Therefore, exceptional circumstances do not need to be demonstrated and the application should be considered on the planning considerations which pertain to the Site.

## **Transport, Highways and Sustainability Impact**

- 6.17 A pre-application scoping note has been prepared by Paul Basham Associates and is provided in support of this pre-application enquiry. It seeks to identify the scope of work needed to support a planning application.
- 6.18 The note identifies the national and local transport and highway planning policy that pertains to the Site. The note emphasises the decision making in association with the adjacent site (19/02979/OUTMAJ) which concluded that an objection to development adjacent to the existing PEA could not be sustained on grounds of sustainability, if it is considered that development within the PEA is sustainable.
- 6.19 It is recognised that the development site is relatively remote for access via sustainable modes of travel such as walking, cycling and public transport. However, the Site is considered suitable for the development of B8 uses given its relatively low trip generation and inherently necessary access by motorised vehicles.
- 6.20 The adopted parking standards are set out within the West Berkshire District Local Plan 1991-2006 (Saved Policies 2007). These standards are expressed as maximums and state that up to one space should be provided per 200sqm of B8 floor area. For the proposed storage space of 3,844m<sup>2</sup> the standards suggest a maximum provision of 19 spaces. Parking policy within the emerging local plan is set out by Policy DC 36 and encourages a bespoke assessment. The proposed development is for B8 storage and will not include any full-time employees based at the site. It is anticipated that vehicles will access the site and load/unload goods before departing shortly afterwards. The demand for parking will consequently be very low.
- 6.21 Therefore, the site provides 10 car parking spaces and two spaces for HGVs. This is considered consistent with adopted and emerging policy.

## **Impact on Biodiversity and Ecology**

- 6.22 A Preliminary Ecological Appraisal (PEA) has been undertaken by Nicholas Pearson Associates. An experienced NPA ecologist visited the Site on the 14 July 2022 to record habitats present and assess its potential to support protected species. Chapter 4.0 of the PEA sets out the results of this survey.
- 6.23 The current proposals, at this preliminary stage, have sought to minimise habitat loss through the retention of the woodland and scrub areas, and provide opportunities for enhancement through native species tree and shrub planting. Further ecological assessment will be undertaken when the pre-application response is received, and the proposals are progressed (including lighting and drainage proposals)<sup>7</sup>.

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<sup>7</sup> Paragraph 5.1.2, LVA, Nicholas Pearson Associates (September 2022)

- 6.24 Overall, the ecologist considered that final proposals would avoid/minimise any negative impacts and be in accordance with planning policies and nature conservation legislation if they:
- Protect the woodland, scrub and hedgerows which provide habitat for a range of species.
  - Maintain a coherent network of unlit habitat<sup>8</sup>.
- 6.25 As the current local planning policy does not require a quantitative assessment of biodiversity net gain, it is proposed a qualitative assessment will be undertaken for full planning.

## **Impact on Amenity of Nearby Occupiers**

- 6.26 The majority of nearby occupiers comprise industrial, light industrial, storage uses or suis generis uses which fall under the same umbrella of uses. The proposed use as open storage will result in no amenity impact on these uses.
- 6.27 To the east of Ramsbury Road there are two residential properties. The front elevation of the property closest to the Site is set back 21m from the eastern edge of the Site. There is a further 21m of vegetation and trees, including a raised landform before meeting the rear of a number of shipping containers.
- 6.28 The storage use will result in minimal noise impact (plant and machinery is limited to standard vehicle and HGV movements).
- 6.29 There is likely to be an increase in vehicle movements in the vicinity of the Site, however, as demonstrated in the Scoping Note prepared by Paul Basham Associates the proposed development would not generate a significant number of trips. As Ramsbury Road is identified as a Local Access Route for HGVs and connects to the local classified road network, the trip generation associated with the proposed development could be comfortably accommodated by the local road network<sup>9</sup>.
- 6.30 The development will not comprise any activities which result in odour impacts.
- 6.31 Therefore, it is not considered that the highway and transport impacts result in an impact on the amenity of nearby occupiers nor will they be any impacts from odour or other disturbance.

## **7. DELIVERABLES**

- 7.1 The list below provides a complete list of the required documentation for a forthcoming planning application. We welcome the LPA's opinion on this list.
- Planning Application Form and Notices
  - Plans (Site Location Plan, Existing/Proposed Site Plan, Existing Proposed Elevations, Existing Proposed Sections, Floor Plans, Roof Plans)
  - Design and Access Statement
  - Planning Statement
  - Surface Water and Foul Drainage Scheme
  - Transport Statement
  - Soft/Hard Landscaping Plan
  - Tree Survey and Impact Statement
  - LVIA

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<sup>8</sup> Paragraph 5.1.3, LVA, Nicholas Pearson Associates (September 2022)

<sup>9</sup> Paragraph 7.6, PSA, Paul Basham Associates (September 2022)

- PEA + Biodiversity Net Gain
- Sustainable Construction and Energy Efficiency Data

## 8. CONCLUSION

- 8.1 This pre-application statement provides a description of the proposed development as well as reasoned justification as to why the application should be considered appropriate. This statement makes reference to the proposed development in relation to its site context, planning history and all relevant parts of the Local and National Planning Policy Framework.
- 8.2 The proposal comprises the change of use of land to B8 storage and distribution (open storage) including the siting of storage containers and associated parking. The proposal will be for open market use, and not specific to the needs to Trinity Grain but will provide an additional revenue stream to the business.
- 8.3 The proposed development is considered acceptable in principle and in accordance with the adopted local plan. The emerging local plan considered the Site as suitable expansion space to the existing industrial site and allocates it for growth. Therefore, in accordance with the emerging local plan, the development is considered acceptable in principle.
- 8.4 The impact on the landscape and the AONB has been appropriately considered, and it is reasonable to assess that if an application were forthcoming that the impacts would be acceptable in all policy terms.
- 8.5 The impact on the highway network has been appropriately considered, and again if an application were forthcoming that the impacts would be acceptable in all policy terms.
- 8.6 Trinity Grain welcome WBC's opinion on the acceptability of the principle of development, the technical matters discussed, and any other relevant technical matters WBC deems appropriate. We have provided a list of deliverables which we expect would be required with a full planning application and request WBC opinion on this matter.

