

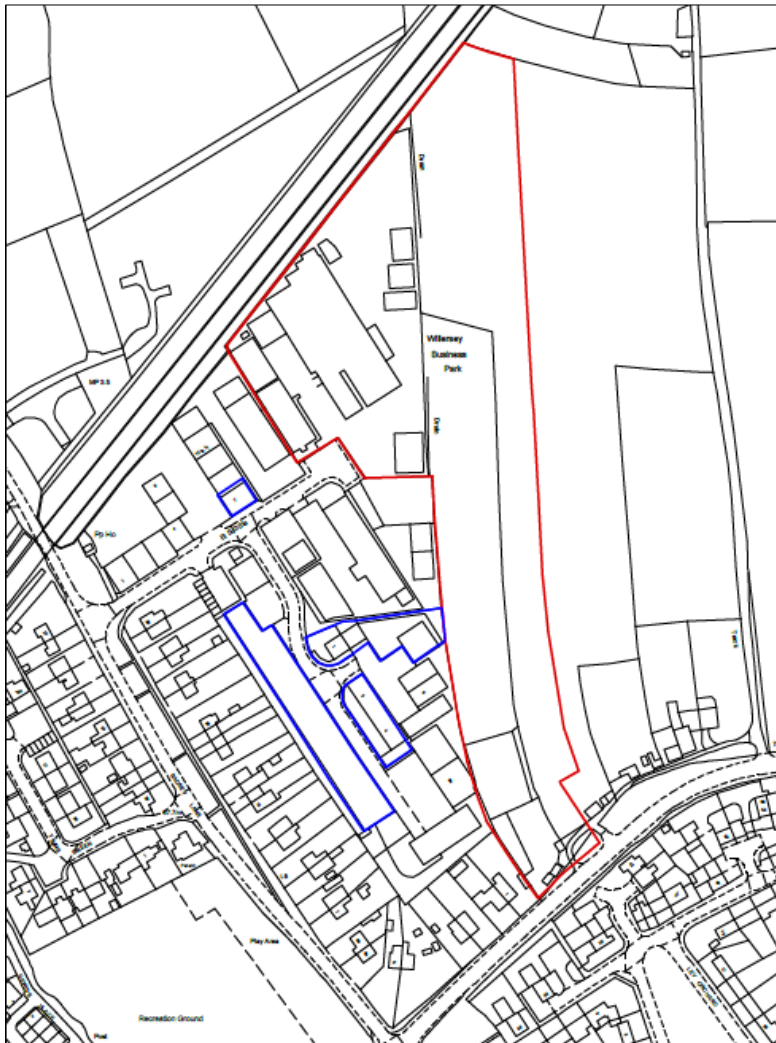
1.0 INTRODUCTION

- 1.1 This application seeks full planning permission for an important employment development proposal at Willersey.
- 1.2 The proposal is submitted by Auto-Sleepers, the largest employer in the area, and relates to a major investment to expand, reorder and improve its production operations.
- 1.3 The scheme would involve a partial redevelopment of its existing site and new development on the employment land element of the adjacent mixed-use allocation (W_7A/WIL_E1C), contained in the Cotswold District Local Plan 2011 – 2031 (the Local Plan), which was adopted in 2018.
- 1.4 This Statement provides details about the applicant, the site, its surroundings and its planning history. It then explains the application proposal and reviews the relevant national and local planning policies and considerations, and assesses the proposal against these. Finally, it sets out conclusions and a request that Cotswold District Council (the Council) grants permission for this important employment development.

2.0 AUTO-SLEEPERS

- 2.1 The applicant is the Auto-Sleepers Groups Ltd, which is the largest employer in the area and occupies a range of premises at its Orchard Works site on the Willersey Industrial estate (see site location plan).
- 2.2 The Auto-Sleepers story began with the Trevelyan family from Willersey. Back in 1961, they were searching for a touring holiday with a difference. Resourcefully, they built their own motorhome based on a Morris J2 van, which took them to the South of France for their holidays. Learning valuable lessons from the prototype, they returned and incorporated design refinements into a second model, Austin-based this time, which soon attracted the attention of dealers Henlys of Bristol.
- 2.3 Faced with an order for five more models, they employed local builder Bob Halling as a subcontractor, who was later employed as works manager for the company, and Auto-Sleepers was born. Today Auto-Sleepers remains a family orientated business and is still staffed by people who are genuinely passionate about quality motorhomes.
- 2.4 Auto-Sleepers now has over 60 years' experience in meeting the needs of customers who are looking for the best in British-built motorhomes. Based at its Willersey site, the company employs circa 137 staff (currently 12 below the full complement), who continue the company tradition of taking great pride in hand craftsmanship and design expertise. As a result, the company has developed a brand leading reputation for prestige quality and excellent service. It is a major success story and delivers considerable economic benefits to the area.
- 2.5 However, the company faces challenges and uncertainties. Many of its operational constraints arise from the production facilities at Willersey, which have evolved over time in an incremental piecemeal manner. This has meant that the production 'flow' is less efficient than it could be, leading to delays, inefficiencies and complications in the production process.
- 2.6 The constrained nature of the site also limits storage facilities for chassis units, materials and completed vehicles. This means that more delivery vehicle movements are necessary than would be the case with better storage areas. The congested site and older buildings also limit staff welfare facilities and the customer 'front of house' experience.
- 2.7 In an increasingly competitive and dynamic global market, Auto-Sleepers needs to ensure that these inefficiencies are addressed and that its production facilities are fit for purpose in the 21st century.

3.0 **SITE LOCATION AND ITS SURROUNDINGS**



- 3.1 The application site covers 2.96 hectares. Most of the site comprises the rectangular western part of the Local Plan site allocation reference W_7A/WIL_E1C. The site also includes part of the existing Auto-Sleepers Orchard Works and a small area to the north of the allocation, extending the site up to the logical boundary with the former railway line.
- 3.2 The main part of the site is relatively flat and featureless grazing land, the only notable feature being a hedgerow containing some trees along the eastern boundary of the industrial estate. The part of the site which falls within the existing Orchard Works includes industrial buildings, hard surfaces, plant and external storage areas.
- 3.3 A fuller site description and analysis, along with photographs, is contained within the Design and Access Statement (DAS).

4.0 PLANNING HISTORY

4.1 The Council's planning register includes the following applications on the existing Auto-Sleepers Orchard Works site:

02/02567/FUL – Workshop extension. Granted 6 February 2003.

05/01599/FUL – Erection of steel building. Granted 15 August 2005.

09/00835/FUL – Change of use to include display and retail sale of motor homes and laying out of five visitor car parking spaces. Granted 17 June 2009.

4.2 There is no previous planning history on the main part of the site (the open field area).

4.3 A pre-application advice submission (21/03769/PAYPRE) was made in 2021 in respect of draft proposals for Auto-Sleepers and an indicative layout for the residential part of the Local Plan site allocation. The officer response was supportive in principle and included detailed advice which has been used to inform this application.

4.4 A separate pre-application advice submission, regarding transport matters, was made to Gloucestershire County Council. A response was received in January 2022. It was supportive and included detailed advice that has been used to inform and refine this application submission.

5.0 PROPOSAL

- 5.1 For several years, Auto-Sleepers has been working with the Gloucester Diocesan Board of Finance (GDBF), which is the landowner of the Local Plan site allocation reference W_7A/WIL_E1C. A land sale of the western portion of the site allocation has been agreed, to enable it to pursue these current proposals.
- 5.2 As explained in section 2, Auto-Sleepers has a pressing need to reorder and modernise its production facilities and this application sets out its detailed proposals. These will help to secure the future of the company's operations in this location, consolidate and grow local employment, make the business more efficient, and limit commercial traffic.
- 5.3 The proposal has been the subject of meticulous site planning and refinement. It includes a large new assembly building with arrays of rooftop solar panels, new buildings for assembly related processes and servicing, a new office/reception hub and large external storage areas for products and materials.
- 5.4 The key components of the proposal can be summarised:
- A new (private) road through the expanded site, with an access to the B4632
 - A large new assembly 'Building F' (3,498 square metres) with rooftop arrays of solar panels
 - Linked buildings B/C/D including for commercial processes, canteen and offices (1,526 square metres combined)
 - Buildings G/H for commercial processes (638 square metres)
 - External storage area for chassis units and completed motorhomes
 - 44 car parking spaces for staff and visitors, including disabled spaces (4) and EV charging spaces (8). Note that the existing 88 space staff car park (outside the application area and shown edged blue on the site plan) will be retained
 - Building A – office and reception facilities with landscaped frontage containing retained and new trees
 - Landscaped buffer to eastern margin to include native species hedgerow and trees

5.5 The application comprises the following documents and plans:

- Application form and certificates
- AL.P.001 Rev A Site Location Plan
- AL.P.010 Rev A as existing site plan
- AL.P.011 Rev B as existing building plans & elevations
- AL.P.110 Rev C proposed site plan
- AL.P.119 Rev A proposed building plans & elevations building A
- AL.P.120 Rev A proposed building plans & elevations building F
- AL.P.121 Rev A proposed building plans & elevations buildings B/C/D & E/H
- Planning Statement (this document)
- Design and Access Statement
- Transport Assessment
- Travel Plan
- Flood Risk Assessment and Sustainable Drainage Strategy
- Noise Report
- Archaeology Report 1 – Desk Based Assessment
- Archaeology Report 2 – Written Scheme of Investigation
- Archaeology Report 3 – Archaeological Evaluation
- Tree Survey
- Ecology Report 1 – main site PEA
- Ecology Report 2 – Auto-Sleepers site PEA
- Ecology Report 3 – bat survey

6.0 MOST RELEVANT NATIONAL AND DEVELOPMENT PLAN POLICIES

The National Planning Policy Framework (the Framework)

6.1 The most relevant chapters of the Framework are:

Chapter 2 – achieving sustainable development

Chapter 6 – building a strong competitive economy

Chapter 9 – promoting sustainable transport

Chapter 11 – making effective use of land

Chapter 12 – achieving well designed places

Chapter 15 – conserving and enhancing the natural environment

Chapter 16 – conserving and enhancing the historic environment

The Cotswold District Local Plan 2011 – 2031

6.2 The Local Plan was adopted in 2018. It is the statutory development plan for the area and therefore carries significant weight in decision making.

6.3 Policy DS1 sets out the development strategy and states that sufficient land will be allocated to deliver at least 8,400 dwellings and at least 24 hectares for B class employment use over the plan period in identified 'Principal Settlements', which includes Willersey.

6.4 Policy S19 of the Plan addresses Willersey and allocates site reference W_7A/WIL_E1C for a mixed-use development comprising '49 dwellings net and 1.97 hectares for B1, B2 and/or B8 use class employment land.'

The supporting narrative states that the allocation "*...has potential to enable further employment development in Willersey to build upon the success of the existing industrial estate. Evidence demonstrates that locating new employment sites next to existing, successful industrial estates is the most suitable and viable for delivering employment development. To help enable employment development to occur and improve the site's viability, it is proposed that housing is also developed on the site. A mixed-use allocation is therefore proposed.*" (Paragraph 7.22.4)

6.5 Other relevant Local Plan policies include:

DS2 – development boundaries

EC 1 – employment development

EC2 – safeguarding employment sites (including Willersey Industrial Estate – site reference EES5)

EC3 – proposals for all types of employment generating uses

EN1 – built, natural and historic environment

EN2 – design

EN4 – the wider natural and historic landscape

EN5 – Cotswolds Area of Outstanding Natural Beauty

EN7 – trees, hedgerows and woodlands

EN8 – biodiversity and geodiversity: features, habitats and species

EN12 – historic environment: non-designated heritage assets

EN14 – managing flood risk

INF1 – infrastructure delivery

INF3 – sustainable transport

INF4 – highway safety

INF5 – parking

INF7 – green infrastructure

INF8 – water management infrastructure

INF10 – renewable and Low Carbon Energy Development

7.0 PLANNING ASSESSMENT

Planning principle

- 7.1 The scheme represents an important employment development proposal that accords with the Local Plan and the Framework.
- 7.2 With regard to the Local Plan, almost all of the site falls within the defined development boundary for Willersey, where policy DS2 confirms that development will be permissible in principle. The proposal also accords with, and delivers, policy S19's planned expansion of the Willersey Industrial Estate under site allocation W_7A/WIL_E1C.
- 7.3 Whilst it is recognised that a small part of the site strays just beyond the defined development limit, it is a logical inclusion, given the physical barrier formed by the former railway embankment to the north. Moreover, the Local Plan does not preclude employment development outside development boundaries and this element would accord with policy EC1, as it is part of a wider proposal that supports high quality jobs and economic opportunities.
- 7.4 The proposal finds full support from the Framework, particularly its chapter 6, which addresses building a strong, competitive economy. Paragraph 84 says that planning decisions should help create the conditions in which businesses can invest, expand and adapt and that 'significant weight' should be placed on the need to support economic growth and productivity. Paragraph 85 also provides support for the small amount of space beyond the Willersey development limits, as it encourages a flexible and positive approach to meeting business needs in rural areas.
- 7.5 The proposal is therefore acceptable in principle in terms of local and national policy and should be supported.

Design, character and appearance

- 7.6 The layout design has been informed by a very detailed analysis of production flow processes. The proposed layout design will create a logical production flow, and create a one-way route for large delivery vehicles, which will be much more efficient and safer.
- 7.7 Whilst the new buildings are unapologetically of an industrial and commercial design, they will be of a high quality and include attractive facing materials and landscaping, giving a pleasing and appropriate appearance. Particular attention has been paid to the external appearance

of the development in wider views and the context of the adjacent village and planned future housing on the remainder of the site allocation.

- 7.8 The DAS provides a full analysis and explanation of the design approach, which ensures that the appropriate standards of design required by the Framework (chapter 12) and the Local Plan (policy EN2), are met.

AONB and Landscape Impact

- 7.9 The site is outside the AONB but, given that the AONB is immediately to the south, it does lie within its setting. Care has been taken to minimise impact on the AONB setting in terms of layout, building density, building heights and a comprehensive landscaped approach.
- 7.10 The southern part of the site will be open and landscaped, with several retained mature trees and additional planting, providing appropriate landscape mitigation. A landscaped buffer zone will run along the entire eastern margin of the site, which will contain a native species hedgerow with trees. This will soften the impact of the development and provide an attractive green edge and an appropriate interface with the planned future housing to the east.
- 7.11 The proposal is considered to be acceptable in terms of landscape impacts and it accords with national policy (Framework chapter 15) and with Local Plan policies, notably policies EN4 and EN5.

Sustainability and energy efficiency

- 7.12 The scheme will include significant on-site renewable energy generation through banks of roof mounted solar panels. It is likely that these will generate the full energy requirements of the Auto-Sleepers' operations at this site. This accords with chapter 14 of the Framework and Local Plan policies EN1, EN2 and INF10, which all encourage measures to assist in meeting the challenges of climate change.

Access, transport and accessibility

- 7.13 The application is supported by a Transport Assessment (TA) and an accompanying Travel Plan (TP).
- 7.14 The TA establishes the following summary findings:
- A review of the local highway network and collision data in the vicinity of the site indicates that there are no apparent problems in relation to the current operation or safety of the local highways.

- The site is compliant with local and national planning policy and guidance, particularly the CDLP.
- Safe and suitable access is achieved for HGVs and cars.
- Parking provision is considered to be suitable to serve the proposed development.
- The development will not result in an increase in traffic movements and therefore does not conflict with Paragraph 111 of the NPPF.

It concludes that the proposal "... will not result in a severe impact upon the safety or operation of the local highway network; as such, there are no significant highways and transportation matters that should preclude GCC from recommending approval of this planning application."¹

7.15 The TP sets out initiatives and measures in order to influence staff and visitor travel behaviour and therefore minimise single occupancy car journeys and encourage staff to use other sustainable modes of travel. Although it should be noted that vehicle trips to and from the development will not increase, the TP responds to the opportunity to encourage sustainable travel by staff.

7.16 There are no transport related planning objections to the proposals.

Flood risk and drainage

7.17 The application is supported by a flood risk assessment (FRA) and sustainable drainage strategy. This demonstrates that the development will not be at risk of flooding, it will not increase the risk of flooding elsewhere, and that satisfactory drainage arrangements will be put in place.

7.18 The proposal therefore accords with national (Framework chapter 14) and local planning policy (EN14 and INF8) in these regards.

Noise

7.19 There are some existing noise sources at the Orchard Works. The main source is the air handling plant, which is located close to the existing eastern site boundary.

¹ Auto-Sleepers Willersey Transport Statement (October 2022) – paragraph 7.4

7.20 The proposal enables this equipment to be relocated and contained within an acoustic screen. This will achieve a significant reduction in noise at what will be the future residential boundary.

7.21 A noise report is submitted with this application. It concludes that '*... the proposed development would reduce the noise levels across the allocated land while not causing a significant adverse impact to existing receptors. With appropriate design, the allocated land would be able to be developed to achieve acceptable internal and external noise levels.*'²

Residential amenity

7.22 Particular care has been taken to ensure that the proposals will not cause any undue amenity issues for existing or future occupiers of residential property.

7.23 The applicant has worked closely with the GDBF landowner to ensure that its proposals are appropriate with regard to the future phase of circa 49 houses that will be developed on the remaining site allocation to the east. Key layout and design features include:

- A dense landscaped buffer along the entire site boundary to create a green edge to the development
- Addressing existing on-site noise sources (see 7.19 – 7.21)
- Locating the main production building well away from the residential boundary.
- Large open storage areas in the north-eastern part of the site, as they are quiet low-key uses
- Locating buildings B/C/D appropriately to buffer the future housing from HGV movements.
- No openings in the rear of buildings B/C/D

7.24 Existing occupants of dwellings in the vicinity should experience some amenity benefits from the rationalised HGV movements and reduction in reversing beepers.

7.25 The proposal is considered acceptable in terms of impacts on residential amenity and accords with national and local planning policies.

² Noise Assessment (October 2022) – paragraph 6.4

Biodiversity and Trees

- 7.26 The application is supported by a tree survey report and by 3 ecology reports. The first ecology report provides an appraisal covering the wider GDBF landholding (housing and employment allocations combined). The second covers the portion of the site within the Auto-Sleepers existing Orchard Works site. The third is a bat survey.
- 7.27 The appraisals indicated that the site was unremarkable in terms of biodiversity, most of the site being improved grassland and closely grazed by sheep, with some limited areas of semi-natural broad-leaved woodland, all of which are recorded in the tree survey. The bat survey found no evidence of roosting bats and concluded that, "*The current evidence collected suggest that bats are likely absent from the buildings on the Site.*"³
- 7.28 It is an inevitable consequence of the Local Plan site allocation, and the proposed development itself, that most of the existing habitat will be lost. However, the proposal does include:
- Retained mature trees at the site frontage
 - Landscaped green space at the site frontage
 - A very substantial landscaped buffer (circa 400 metres) along the eastern site margin, planted in native species hedging and trees
 - Bird and bat boxes (locations to be agreed)
- 7.29 Given the site allocation and the evidence of limited ecological value on the site, along with the biodiversity content of the scheme, including almost 400 metres of new native hedgerow, the proposal is considered acceptable with regard to national and local planning policies concerning the natural environment.

Historic environment and archaeology

- 7.30 There are no Listed buildings within the site or within its immediate vicinity. The closest Listed buildings are on Main Street and Church Street within the centre of the village, with no direct intervisibility with the site.
- 7.31 The site is also some distance from the Willersey Conservation Area (WCA), which was designated in May 1973. The separating distance, along with intervening built development (Pike Corner, Ley Orchard and along

³ ECUS Bat Survey (2022) Paragraph 6.1.4

the B4623), mean that the development would not impact on the setting of the WCA, i.e., it would be preserved.

- 7.32 The Local Plan requires⁴ that an archaeological evaluation is carried out for this site. The land owner commissioned a Desk based Assessment in 2017, a Written Scheme of Investigation in January 2018, and an Evaluation in May 2018. All three documents are submitted with this application.
- 7.33 No significant archaeological interest was discovered through these investigations. At the pre-app stage, the Gloucestershire County Council Archaeology advised that: *'Thank you for sending the archaeological evaluation report which was carried out in relation to a previous development proposal at this site and the results have been added to the Historic Environment Record. Due to the evaluation recording nothing considered to be of archaeological significance, I recommend that no further archaeological investigations are necessary at this site.'*
- 7.34 The proposal therefore accords with the requirements of national and local policies concerning the historic environment.

Wider economic benefits

- 7.35 The proposal will mean that a number of units on the Willersey industrial estate, currently occupied by Auto-Sleepers, will become vacant. These will provide new opportunities for other businesses on this very successful business park. This will widen the employment base in the area and support the objectives of the Framework and the Local Plan to build and support a strong and competitive economy.

Phasing and delivery

- 7.36 Given Auto-Sleepers' commercial imperative to take forward this scheme, it will be delivered as the first phase of the mixed-use allocation. Auto-Sleepers' programme is to commence works as soon as possible in 2023 and complete the project as soon as practicable.
- 7.37 There is some considerable benefit in this sequence and timing of the development in terms of:

Practicality – it will be much easier to develop the employment site with access from the south and east, rather than construction traffic creating conflicts with the day-to-day activities of the busy industrial estate,

⁴ Cotswold District Local Plan 2011 – 2031 paragraph 7.22.6

Noise – the application proposal will address and mitigate noise sources at Auto-Sleepers that will create a quieter and acceptable noise environment for future residents on the housing allocation.

Landscaping – the native hedgerow and trees within the eastern landscape buffer can be planted and will start to become established prior to the housing coming forward.

8.0 CONCLUSIONS

- 8.1 This is a significant and important employment development proposal. It will modernise and secure the future of the largest employer in the area, safeguarding an existing 137 jobs and potentially creating 26 new jobs. The proposal is plan-led and takes forward the entirety of the employment allocation set out in the Local Plan.
- 8.2 This Statement and the supporting plans and documents demonstrate that this proposal accords with national and development plan policies and should be supported.
- 8.3 Accordingly, Cotswold District Council is requested to grant planning permission and allow this important, high quality, employment generating development to proceed.

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