REPORT FOR WESTERN AREA PLANNING COMMITTEE

Date of Meeting	11 June 2025
Application Number	PL/2023/04525
Site Address	Bradford Rugby Football Club, Ashley Lane, Winsley, Bradford on Avon, Wilts, BA15 2HR
Proposal	Outline application with matters relating to access, appearance, layout and scale for the construction of an indoor training facility at the existing rugby ground
Applicant	Bradford on Avon Rugby Limited
Town/Parish Council	WINSLEY
Electoral Division	WINSLEY & WESTWOOD – Cllr Nigel White
Type of application	OUTLINE WITH ALL MATTERS APART FROM LANDSCAPING RESERVED
Case Officer	Verity Giles-Franklin

Reason for the application being considered by Committee: This application was called in by the former Winsley and Westwood councillor, Cllr Kidney prior to the local election, if officers were minded recommending this application for approval. Cllr Kidney referenced scale of the development, the visual impact on the surrounding area, design, and environmental and highway impacts as reasons for the call-in request as well the following:

The proposed development site is in a sensitive greenbelt location. The scale of the proposed development will harm the open character of the greenbelt. There are also highways concerns, particularly given the constrained nature of Ashley Lane and existing issues with traffic in the lane. Given the sensitivity of the location, it is disappointing that no pre-application engagement was carried out by the applicant with the local community and the parish council.

Following the local election, the new local ward member for Winsley and Westwood, Cllr White, was contacted by the case officer to discuss the case and the call-in, and in response Cllr White confirmed that the logged call-in request should be honoured in light of the concerns raised by the Parish Council.

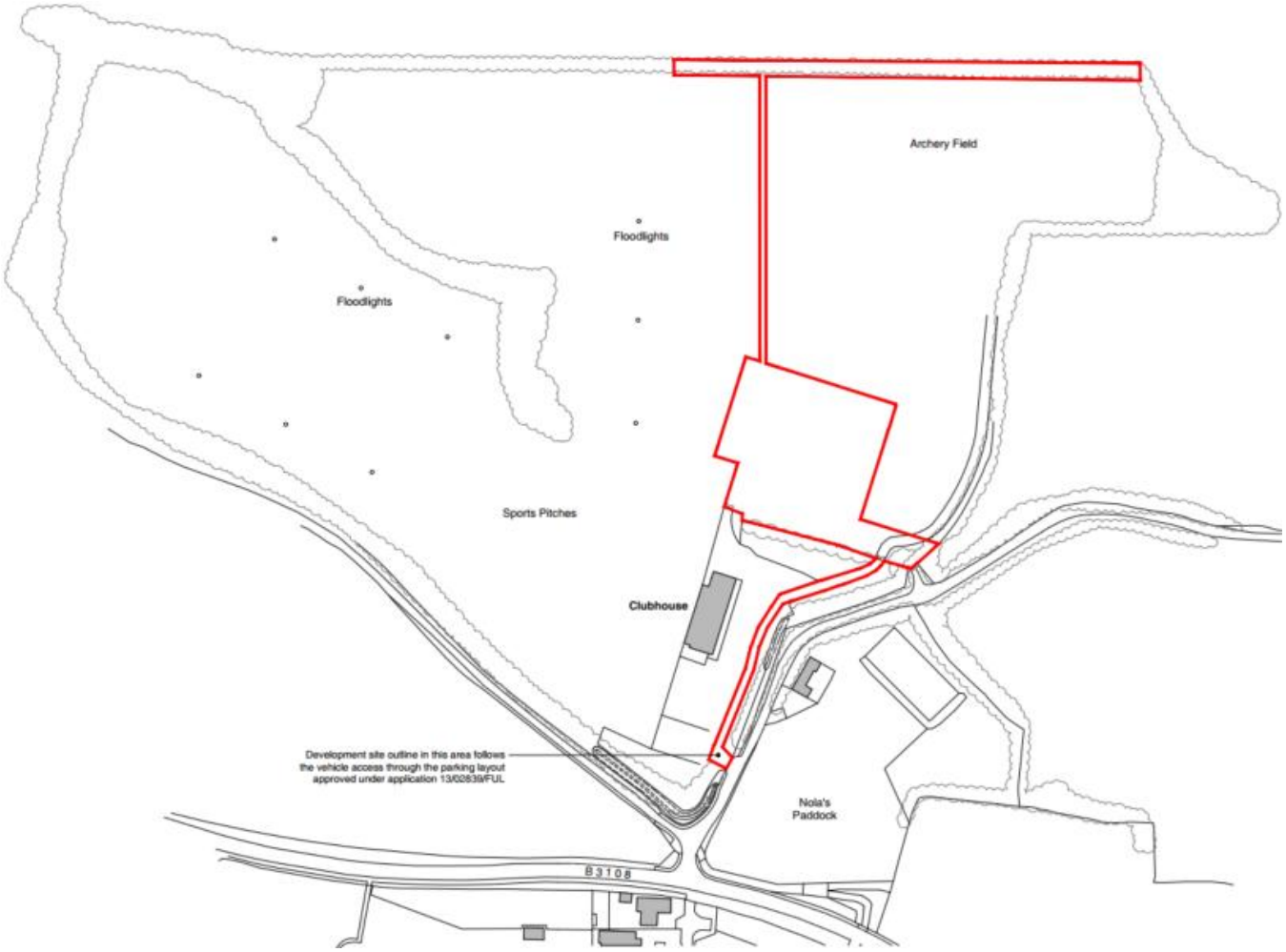
1. RECOMMENDATION: For the reasons set out within this report, officers recommend that members of the Planning Committee endorse the officer recommendation to approve the abovementioned application, subject to the planning conditions, as set out in Section 11 of this report.

2. Purpose of Report: To assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application should be approved subject to conditions.

3. Report Summary: This report appraises the: principle of development; the impacts on the Green Belt; design, the visual and landscape impacts; highway safety; ecology; drainage and flood risk; and the impacts on neighbouring amenity.

Winsley Parish Council objects to the application, the details of which are provided within section 8 of this report. A total of 48 public representations have also been received, which are summarised within section 9 of this report.

4. Site Description: The application site forms part of the Bradford Rugby Football Club grounds in Winsley. The existing rugby football club was originally granted planning permission under application reference W/92/01206/FUL, with the laying of pitches and the erection of the clubhouse being granted under a subsequent application seven years later under application reference W/99/00004/FUL. An extract of the submitted location plan (drawing no. L001 Rev D) for this current proposal is provided below:



The application site includes existing outdoor pitches which are mown with floodlighting, goal posts, on-site car parking provision and a clubhouse. The site is bound by established vegetated boundaries and occupies a relatively flat topography which does elevate northwards towards Great Ashley. The wider area comprises predominantly agricultural use, with Winsley village to the south, on the other side of the B3108 road, from which this site is accessed.

The subject site is located to the north-east of Winsley and to the west of Bradford on Avon. The site is located in open countryside on land designated as Green Belt and within a locally designated Special Landscape Area (SLA) that encompasses the southern fringes of The Cotswolds, although the site itself is not designated as National Landscape. The Cotswold National Landscape is in fact,

located 350m to the south of the site.

The site is however located within various core roost buffer zones associated with the Bath and Bradford on Avon Bat Special Area of Conservation (SAC).

5. Planning History: The following site planning history is of relevance to this application:

W/92/01206/FUL - Change of use from agricultural to sports facilities - Approved with conditions.

W/97/00811/FUL - Erection of rugby club headquarters, sports pitches, kit container and ancillary works - Approved with conditions.

W/99/00004/FUL - Laying of pitches and erection of clubhouse - Approved with conditions.

W/01/02096/FUL - Proposed shelter extension to west side of club house - Approved with conditions.

W/03/01301/OUT - Erection of single storey building for use as a kindergarten (outline - siting and means of access not reserved) – Refused.

W/04/01553/FUL - Training floodlights to training area – Approved with conditions, including a condition restricting the use of the lights during weekday evenings to 17:00-22:00 hours and between the hours of 17:00-20:00 during weekend and bank holiday evenings.

W/05/00096/FUL - Change of use from agriculture to recreational facilities – Approved with conditions.

13/02839/FUL - Two-storey extension to clubhouse - Approved with conditions but never implemented

18/03998/FUL - Installation of 6No 15m high galvanised steel columns with floodlighting to serve pitch 2 and adjacent training area – Withdrawn

19/01179/FUL - Installation of 6no 15m high galvanised steel columns with floodlighting to serve Pitch 2 – Approved with conditions, including a condition restricting the use of the lighting to be in operation between the hours of 16:00hrs to 22:00hrs Monday to Saturday between 1 September to 31 March only

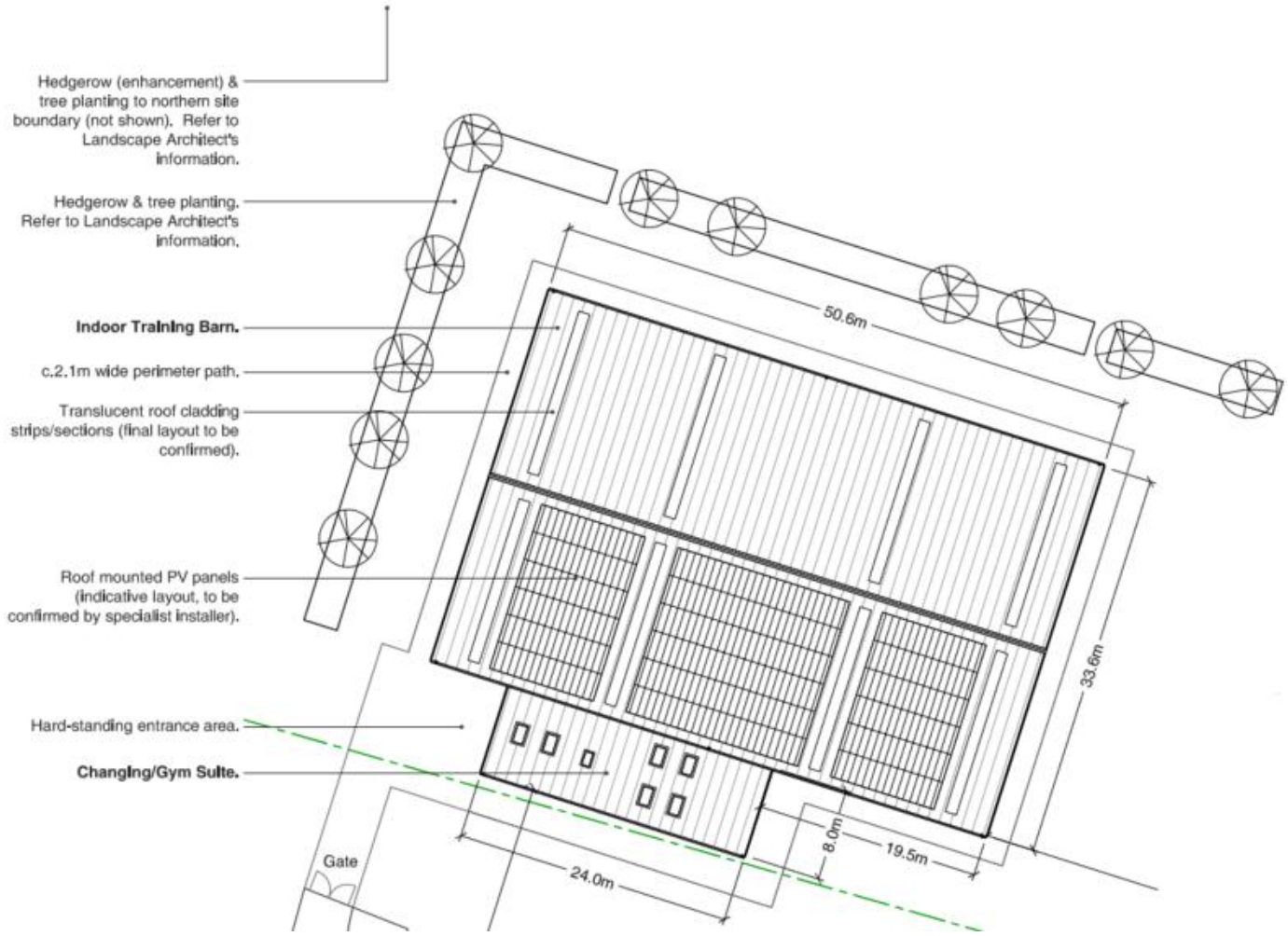
6. The Proposal: This application is seeking outline planning permission, with matters relating to access, appearance, layout and scale to be considered, for the construction of an indoor training facility for Bradford on Avon rugby club to provide all year-round training facilities.

The proposed training facility would be located to the north of the existing clubhouse, with the proposed building being sited close to the existing building and on-site car parking provision. No additional external lighting is proposed as part of this application, with the existing floodlights to be retained – noting that three floodlights were approved under W/04/01553/FUL and 6 under reference 19/01179/FUL.

The applicant submitted a Business Case statement (dated March 2023) confirming that each

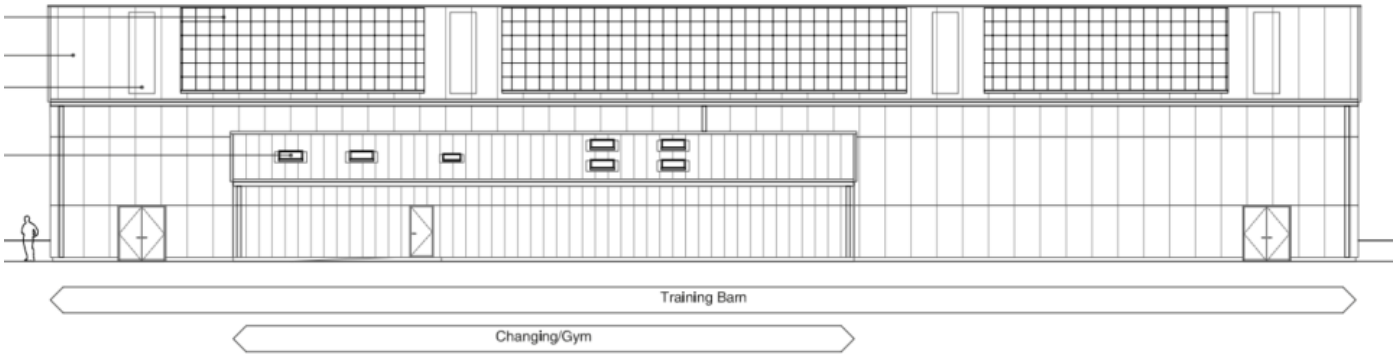
winter the club has to cancel several training sessions due to adverse weather conditions, as the existing pitches become waterlogged or snowed under. Since the club relies on membership fees as one of its primary sources of income, the lack of use of the current facilities creates significant financial challenges to the club, particularly during winter periods when the existing pitches are unusable for weeks on end. Under this application, the club seeks to make a permanent solution and enhance its facilities and expand its on-site sporting offer. The proposal to build a training facility would provide players with year-round training opportunities, regardless of the weather, and would serve as an asset that can be rented out to other sports clubs or local groups.

It is important to mention that whilst landscaping has not been included as a detailed matter for this outline application, the proposals do include enhancements to the existing hedgerows, with new tree planting commitments along the western and northern periphery of the proposed building, as demonstrated in the below extract taken from the submitted proposed site plan drawing no. L110 Rev E:



As illustrated, the proposed training building would occupy a rectangular plan form with a pitched roof, measuring 50.6m in length, 33.6m in width and 9.8m in height, as measured from the submitted plans. The proposal includes an attached lean-to aspect to be used as a changing room and fitness suite on the southern elevation, which would measure 4.9m in height, 24m in length and 8m in width.

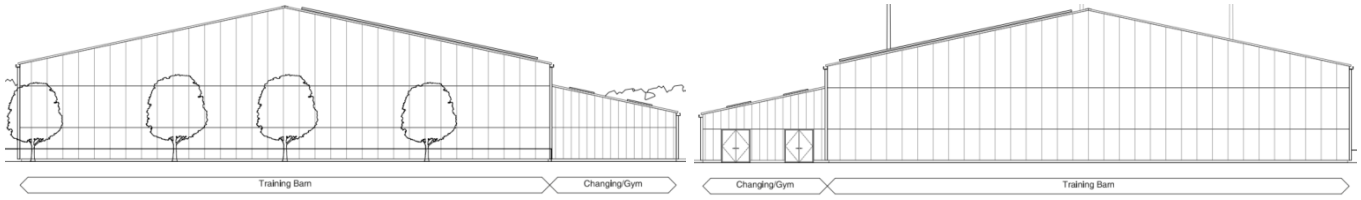
Extracts of the proposed elevations are provided below, taken from drawing L121 Rev C:



Proposed south elevation.

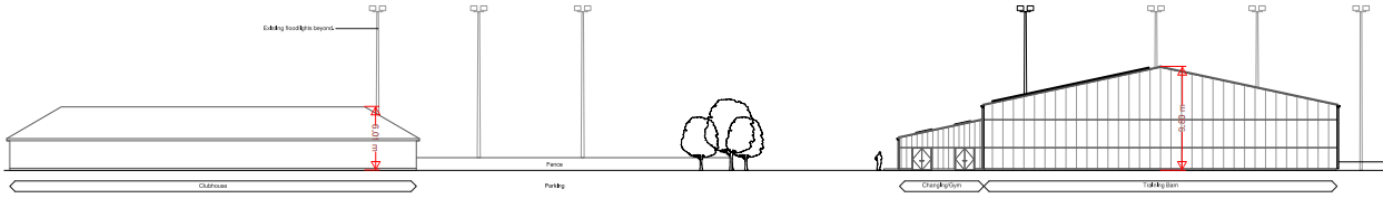


Proposed north elevation.



Proposed west elevation on the left and proposed east elevation on the right.

The proposed building would be completed with a green coloured profiled cladding (both for the walling and roof) with translucent panels to be incorporated within the roof to enable natural light to enter the building and photovoltaic (PV) panels on the southern roof slope. The proposed lean-to aspect of the building would include openable rooflights.



The above extract illustrates the proposed eastern elevation, as would be viewed from the existing car parking area and shows that the proposed training facility would be about 3.8m higher than the existing clubhouse.

Revised plans were submitted during the life of the application to address comments, which resulted

in a reduction in the overall height and scale of the proposed building as well as to resolve a landownership issue which resulted in a redrawn red lined site plan. The application is also supported by a Sustainable Energy Statement, Archaeology Evaluation Report, Ecological Parameters Plan and a commitment to plant additional landscaping. These revisions and additional supporting information were subject to fresh reconsultation exercises, with the amended plans and documents being published on the Council's website for public viewing.

7. Planning Policy:

National Context: National Planning Policy Framework (NPPF); Planning Practice Guidance (PPG)

Local Context: The adopted Wiltshire Core Strategy (WCS) 2015, namely core policies (CP): CP1 - Settlement Strategy; CP2 - Delivery Strategy; CP3 - Infrastructure Requirements; CP7 - Spatial Strategy for the Bradford on Avon Community Area; CP50 - Biodiversity and Geodiversity; CP51 - Landscape; CP52 - Green infrastructure; CP57 - Ensuring High Quality Design and Place Shaping; CP58 - Ensuring the Conservation of the Historic Environment; CP60 - Sustainable Transport; CP61 - Transport and New Development; CP62 - Development Impacts on the Transport Network; CP64 - Demand Management; CP67 - Flood Risk

Saved policies of the West Wiltshire District Plan (1st Alteration) adopted June 2004: C3 Special Landscape Areas and U1a Foul Water Disposal

Malmesbury-Corsham Limestone Lowlands (16A) of the Wiltshire Landscape Character Assessment

Wiltshire Council's Local Transport Plan 2011-2026

West Wiltshire Leisure and Recreation DPD (February 2009)

8. Summary of Consultation Responses

Winsley Parish Council: *Although the size and height of the proposed building have been reduced, concerns remain about the impact of the proposed development in the Green Belt. The points submitted by the Parish Council in its objection to the original proposal still stand.*

Particular concerns relate to a lack of clarity about the possible use of the site by other rugby or sports groups from outside the area, which may be needed to make the development viable. Journeys from outside the area would add traffic to the local road system and the narrow lanes by the Rugby Club are likely to be impacted significantly. The traffic plan data provided is not felt to reflect accurately the current traffic and parking situation and the submission does not include plans for managing increased traffic or parking as a result of additional use of the Club facilities.

The Parish Council's original objection referred to in their latest comments (dated March 2025) is copied below for completeness:

Overall

- *The need for a facility of this size in the Green Belt has not been justified.*
- *The benefits of this proposal are not considered to outweigh the harm to the open character of the Green Belt.*
- *The scale of the building and project seem inappropriate given the size and nature of the Rugby Club.*

Green Belt

- *The proposed site is in a sensitive Green Belt location.*
- *The scale of the proposed development will harm the open character of the Green Belt.*
- *It is undesirable to have a structure of this size in the Green Belt.*
- *This is an indoor, not outdoor facility, in the Green Belt; if additional facilities are needed then an outdoor facility would be more appropriate for the site.*

Size of the building

- *It would dwarf the existing building and would dominate the skyline.*
- *The height of the roof is considered excessive.*

Highways

- *Some councillors have concerns about the additional traffic that may be caused.*
- *Any increase in traffic in the lanes through Ashley would be problematic.*
- *The 'no left turn' out of the Rugby Cub entrance would need to be enforced.*
- *It doesn't appear to have serious implications with regard to highways.*

Impact

- *If the facility is used by outside parties there's the potential for increased noise, litter, traffic etc.*

Drainage

- *Flooding occurs on the corner of the road corner adjacent to the club (reinstatement of a pond previously on Rugby Club land might help reduce this).*

General comments

- *The proposal appears excessive for a small-town club.*
- *There are examples of other clubs investing in an all-weather outdoor pitch and this would this seem an appropriate alternative here.*
- *The business case seems weak and there's mention that rugby union is in decline, so it seems a speculative investment.*
- *It appears that it will only benefit a small percentage of club players.*
- *Wider benefits to the community have not been considered (e.g. including facilities that could be used by other sports).*
- *There appears to have been little engagement with the community or with members of the Rugby Club.*
- *If a gym is required, it could be included in a fraction of the space.*

Wiltshire Council Highways: No objection subject to conditions relating to formalising the on-site car parking layout, restricting the use of the building over weekends and provision of secure cycle parking facilities.

Wiltshire Council Landscape: No objections subject to conditions

Wessex Water: No objection but all connections to their network requires separate approval.

Wiltshire Council Archaeology: No objection following the submission of the 'Archaeologist Fieldwork Evaluation Report'.

Wiltshire Council Ecology: No objection subject to conditions, with Appropriate Assessment concluding a favourable outcome, to which Natural England agrees.

Wiltshire Council Climate Team: No objection subject to delivery of the roof mounted solar array.

Wiltshire Council Drainage: No objection pursuant to the access, appearance, layout and scale but as detailed in Section 7.43 of the Planning, Design and Access Statement, a detailed drainage strategy including a Construction Management Plan should be produced and issued for to the LLFA through the DOC process.

9. Publicity: A total of 48 third-party representations have been submitted, 24 in support of the proposals, 1 representation raising no objections to the proposal and 23 raising objections to the proposal for the following summarised reasons:

- Impact on the character of the area
- Facility would be obtrusive to the character of the landscape.
- Block expansive views to Westbury White House and Sailsbury Plain
- Impact on the Green Belt
- Visible from public rights of way
- Building is too high.
- Increase in traffic.
- Loss of parking facilities on site
- Lack of passing spaces on nearby lanes
- Road is already subject to surface water flooding.
- Similar facilities in the wider area
- Impact on the local bat populations and Great Crested Newts
- Loss of habitat
- Insufficient survey work has been undertaken.
- All-weather pitch should be considered.
- Rugby is an outside sport.
- Existing lighting infrastructure has been approved on-site to facilitate existing use.
- Increase in light pollution from increased use of the site.
- Existing lighting is already intrusive.
- The sustainability of the proposal is unclear.
- Lack of consultation with local community
- Facility is not needed.
- Approving the proposal would set a precedent.

The supportive comments identify the proposed building as a beneficial facility for the local area, providing an asset for all ages to engage with sports, and rugby in particular. With the training barn seeking to provide indoor facilities, it would provide an all-year-round resource for local people and other sports clubs, such as Winsley Cricket Club.

10. Planning Considerations

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise. In this case, the Wiltshire Core Strategy, including the relevant policies from the West Wiltshire District Plan that continue to be saved in the WCS, form the relevant development plan for the area.

10.1 Principle of Development: With reference to the above-listed planning history, it is appreciated that this application relates to a site which has a well-established sporting use as a rugby ground. Planning permission has been previously granted for the erection of the clubhouse and floodlights, with a change of use of the site from agricultural to the sports use, with pitches. The proposed building would be sited within the existing rugby complex, on land that has previously been granted a sports use. There would therefore be no loss of agricultural land, and a change of use is not required.

Paragraph 96 of the NPPF states that planning policies and decisions "*should aim to achieve healthy, inclusive and safe places*" which should "*enable and support healthy lives, through both promoting good health and preventing ill-health…for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling*".

The NPPF continues in paragraph 98 that to provide "*the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments*".

Furthermore, paragraph 103 of the NPPF requires "*access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change*".

The saved West Wiltshire Leisure and Recreation Development Plan Document (adopted in February 2009) recognises this site at the Bradford on Avon rugby and football club (RFC) to be of high quality and value in Appendix 1.

Type of Site	Location	Quality	Value
Pitches and Courts			
Bradford on Avon RFC	Winsley	High	High

Policy LP5 of the West Wiltshire Leisure and Recreation Development Plan Document states that proposals for new sports and recreational facilities within the district would be supported where they meet needs identified in an up-to-date needs assessment, are located in the most sustainable locations, and are acceptable via sustainable modes of transport.

In this instance, it is acknowledged that the proposal is seeking to increase the on-site facilities relating to an established recreational use, to provide indoor training facilities for the Bradford on Avon RFC, which can be used all year round. The proposed building would be sited within the established curtilage of the existing sports use and seeks to provide additional facilities for the existing rugby and football club.

It is duly noted that the wider site benefits from planning permission to erect floodlighting to support the use of the outside pitches during evenings and darker afternoons. However, with reference to the submitted supporting Planning, Design and Access Statement, the existing pitches can become waterlogged and frozen during the winter months, which reduces their usability and accessibility. In addition to the applicant's own submissions, officers note that some of the supportive third-party comments reference match and training cancellations during the winter months or periods of adverse weather.

The proposal seeks to erect a training facility, which would be just under half the size of a standard full-sized rugby pitch, in order to provide all-weather and all-year-round training facilities for club members and the wider local community. The proposed training facility is considered necessary by the club to both retain existing members and attract new membership, which would ensure the sustainability of the club.

From the above, the principle of the development is supported by officers, with the proposed training barn providing an additional sporting facility that can be used all year round by the rugby and football club, but also by other local sporting clubs/community groups and would comply with the WCS, the saved policies of the West Wiltshire Leisure and Recreation DPD and the NPPF.

10.2 Principle of the Development in the Green Belt and Impact on Openness: The subject site is located within the designated West Wiltshire Green Belt and therefore regard must be given to the relevant paragraphs of the NPPF, as the adopted WCS does not contain any specific Green Belt policies and therefore such applications are assessed against the provisions of chapter 13 of the NPPF.

As set out in the NPPF, the Government attaches great importance to Green Belts and states in paragraph 142 of the Framework that the *"fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.

When assessing proposals affecting the Green Belt, the NPPF advises at paragraph 153 that "*inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*". When considering planning applications, local planning authorities must ensure 'substantial weight' is given to any harm to the Green Belt, with 'very special circumstances' only existing where "*the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations*".

Paragraph 154 of the NPPF states that development in the Green Belt "*is inappropriate unless one*

of the following exceptions applies". Within the list of exceptions, criterion b) includes:

"the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it"

The NPPF confirms that development for the purposes of outdoor sport and recreational facilities is appropriate in principle in the Green Belt, but only where such facilities preserve the openness of the Green Belt. Therefore, an assessment must be made on whether the proposal would preserve the openness of the Green Belt in order to satisfy the above exception and for the building to be considered acceptable in Green Belt terms.

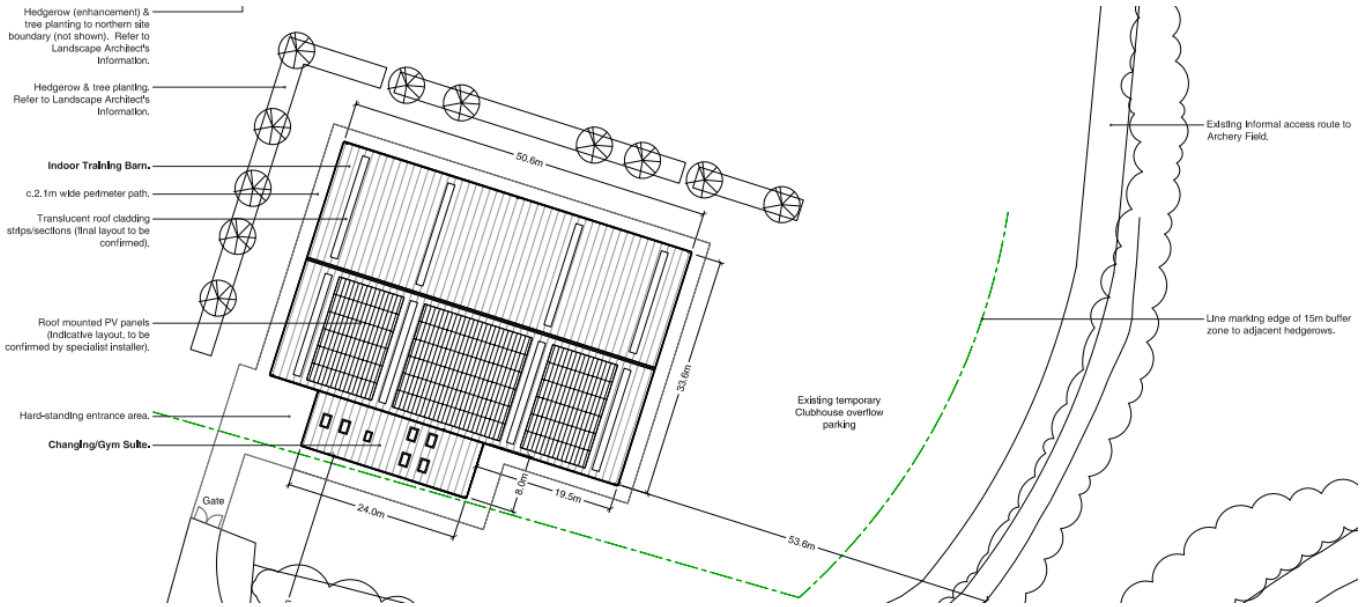
It is fully acknowledged that constructing a building on this site would have a visual impact on the openness of the Green Belt in terms of massing. However, openness encompasses both spatial and visual aspects that necessitate an assessment, and the exception outlined in paragraph 154b of the NPPF does not prevent all new built forms of development within the Green Belt.

As detailed above, the application site is located on land previously consented for rugby/sports use, with the proposed training barn being sited close to the existing clubhouse. This proposal does not encroach onto agricultural land and as can be seen form the site photo below, the existing clubhouse is a single-storey rectangular building, extending to 552 square metres, with the wider site featuring a series of pitches equipped with rugby posts, floodlights, and a gravelled car parking area. The site is viewed within the context of the surrounding open countryside. It is bound by established vegetated boundaries, as illustrated in the photograph below, which shows the location of the clubhouse on the right and the existing pitches, along with the well-established eastern site boundary.



During the course of the application's lifespan, the applicants through negotiation reduced the proposed building's height and scale, with the height of the training facility reducing from 12.6m to 9.8m, representing a 22% decrease and with the reduced footprint showing 6.2m less in length and 3.2m less in width from what was originally proposed. Overall, the size of the building now proposed is about 40% smaller than what was initially submitted.

The existing site boundary and internal hedgerows are all to be retained, with a 15m buffer zone being provided along the eastern edge, as shown by the below extract taken from the submitted proposed site plan drawing (L110 Rev E):



The proposed building would be seen alongside the existing clubhouse and car parking area and would be relatively well contained within what is a well-established rural sporting establishment.

The existing rugby uprights and floodlighting are visible from outside the site and would be of a greater height compared to the proposed building, measuring c.12m and 15m high respectively. Whilst some public views of the training facility would be available, officers are satisfied that the facility would be close enough to the existing clubhouse to ensure the new proposed building would be read in context with the existing rugby club's structures. The applicant's commitment to plant robust landscaping on two sides would also filter the visual and landscape impacts.

The proposed siting of the training building is considered acceptable, forming a cluster of buildings adjacent to an existing vegetated boundary and away from the existing pitches. Furthermore, the proposed building would have an agrarian appearance, which is considered acceptable at this location.

It is considered that the proposal would not significantly harm the openness of the Green Belt and would not conflict with the purposes of including land within it. On this basis, it is considered that the proposed training facility would represent appropriate development in the Green Belt.

10.3 Design, Visual and Landscape Impacts: Core Policy 57 of the adopted WCS, requires a high standard of design for all new development, with all proposals being "*expected to create a strong sense of place through drawing on the local context and being complementary to the locality*".

CP57 requires applications for new development to be accompanied by an appropriate level of information to demonstrate how the proposal would make a positive contribution to the character of Wiltshire.

Within this list of 14 criteria, the policy requires (in criterion iii) proposals to respond positively "*to the existing townscape and landscape features in terms of building layouts, built form, height, mass,*

scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting".

Furthermore, paragraph 131 of the Framework states that the "*creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities*".

CP51 of the adopted WCS states that development should "*protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures*".

Saved policy C3 of the West Wiltshire District Local Plan First Alteration 2004 requires the landscape character of Special Landscape Areas to be "*conserved and enhanced and development will not be permitted which is considered to be detrimental to the high quality of these landscapes*".

Paragraph 187 of the NPPF requires planning policies and decisions to contribute to and enhance the natural and local environment by:

"a) 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).

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;"

As set out in the Green Belt section, officers are satisfied that the negotiated revised proposed development would not result in material harm and as noted earlier in the report, officers support the applicant's commitment to plant new landscaping and retain existing boundary landscaping which in some locations does include mature trees (as stated in the submitted Landscape, Visual & Green Belt Visual Openness Appraisal, reference 251-G101, dated February 2025).

Indeed it was noted during the case officer's site visit and as detailed within the submitted Landscape, Visual & Green Belt Visual Openness Appraisal (LVIA) that public views of the site are gained from outside of the immediate rugby club setting, with the uprights and floodlights being the main features that can been viewed from the public highway, Winsley to the south and the public footpaths to the north.

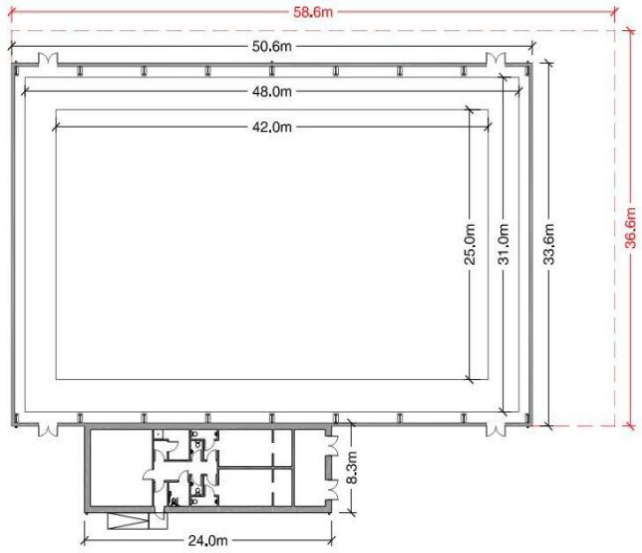
Within the wider rural landscape near to the site, officers also noted that there are other larger, predominantly agricultural buildings, however these are not located immediately adjacent to the rugby club and the existing rugby club grounds are viewed against the backdrop of open countryside.

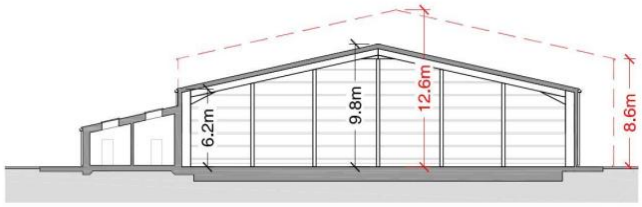
The Council's Landscape Officer was consulted and following officer negotiated revisions, confirmed "*the positive changes made to the size and scale of the development. Reviewing the*

Landscape appraisal, it is obvious the positive impact these amendments to the height and floor plan of the building will have to its visual impact on surrounding PRoW. I am particularly pleased to note the reduction in the buildings potential skylining of distant views across to the Salisbury Plain escarpment as seen in the visualisation on viewpoint 5. This combined with the landscape mitigation strategy, should provide reduce the impact of the built form on this sensitive landscape significantly".

The proposed building would have an agrarian appearance, with revisions to the proposal including a reduction in height, scale, and footprint, resulting in a 40% decrease compared to the originally submitted proposal.

The extracts provided below demonstrate the reduction to the proposed building, with the red outline and text representing the scheme as originally submitted:





In addition to the negotiation reductions mentioned above, the exterior appearance of the training facility building has changed from the initially proposed grey shades to a recessive green colour to assimilate within its rural setting and the vegetated boundaries. It is proposed that the tone of the green cladding would change, lightening towards the top of the building, which would break up the mass of the structure, whilst ensuring it integrates within its setting. A planning condition is recommended to secure this upon any endorsement by the Committee and to obtain specific details of the proposed cladding prior to any works commencing on the walls or roof. A visualisation has been submitted by the applicant, showing the training facility (without the proposed vegetated planning) and how recessive green cladding could help assimilate the structure with its immediate setting as viewed from the existing pitches to the west.



The applicant has also provided the below visualisation of the building with the proposed landscaping included along the building's northern and western periphery (as submitted in their Addendum Design Statement, reference Revision A, dated April 2024), as viewed from the existing pitches, which demonstrates the indicative screening that would provide once established:



The submitted LVIA includes some indicative massing visualisations to show the potential impact and visibility of the proposed training facility from viewpoints around the site. The proposed building has been overlaid on the images, with the outline of the initially proposed building illustrated by the black dash line for comparison:



Taken from Viewpoint 1 at the entrance of the site from the B3108.



Viewpoint 3: View from public footpath WIN547, looking south west. Approximately 243m from Site.



Indicative massing visualisation of the proposed Training Barn as perceived from Viewpoint 3, to highlight proposed height and width (proposed landscape mitigation planting not shown).

Taken from Viewpoint 3 along the public right of way to the east.



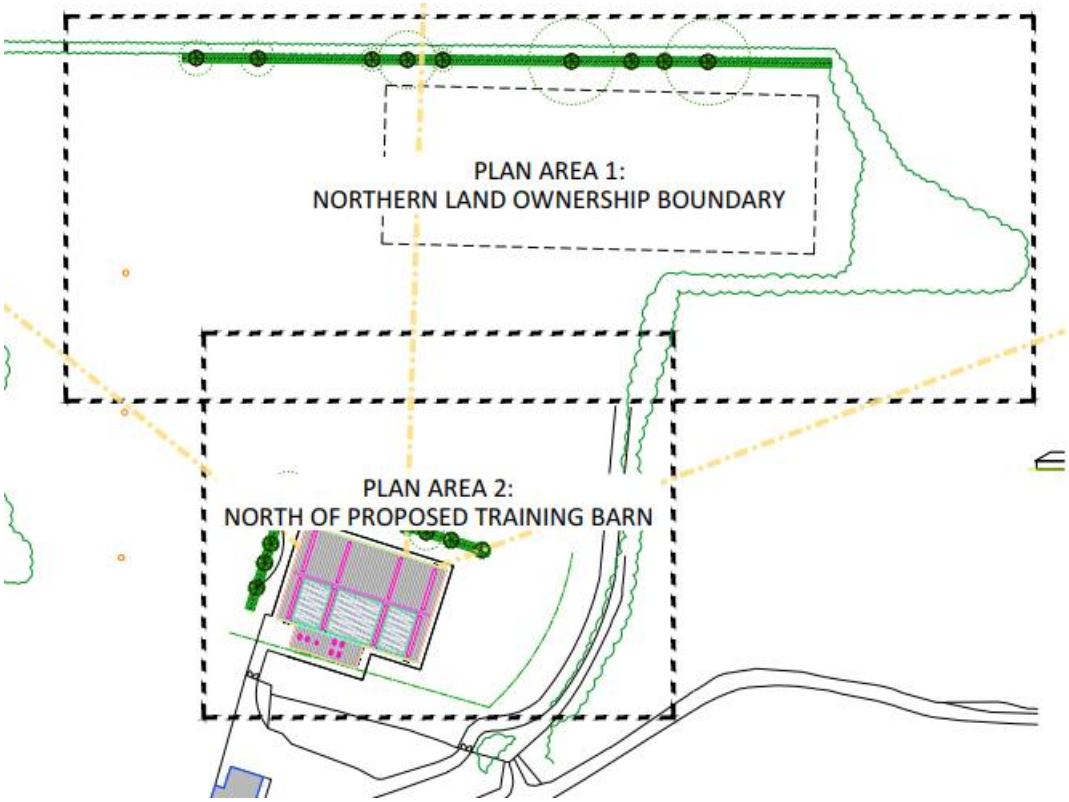
Viewpoint 5: View from public footpath WIN538, looking south. Approximately 350m from Site.



Indicative massing visualisation of the proposed Training Barn as perceived from Viewpoint 5, to highlight proposed height and width (proposed landscape mitigation planting not shown).

Taken from Viewpoint 5 to the north of the site.

In addition to the above-mentioned negotiated revisions, this proposal also includes new hedgerow planting along the eastern and northern boundaries of the proposed building and new planting along the northern boundary of the wider site to enhance the existing hedgerow adjacent to the public right of way. The below extract taken from the submitted Landscape Mitigation Plan (no. 251-001 Rev P4) illustrates the location where the proposed landscaping would be provided:



Some public views of the proposed building would be available however the building would not appear visually obtrusive within its setting and with the applicant's commitment to using recessive coloured cladding and planting around the building, officers conclude the proposal would be acceptable in landscape and visual impact terms.

Moreover, officers support the conclusions reached in the LVIA as set out in section 4.1 (on page 26) which asserts that:

In close range views from the south, from Ashley Lane, the B3108 and the northern edge of Winsley, the existing clubhouse roofscape adjacent to the Site is occasionally visible as is the existing vegetation bounding the field and car park close to the east of the Site. From these locations, the upwards-looking view due to topography prevents visibility into the Site and exaggerates the visual screening effects of intervening vegetation and buildings.

In close range views from public footpaths in the north and north-east, the Site is occasionally visible through intervening field boundary vegetation though views are often heavily filtered. Existing rugby posts and flood lights are evident markers in the view above the vegetation and against the skyline. The extent of visibility towards the Site from northerly locations increases with the gain in elevation northwards, before intervening vegetation limits visibility again further north. Close-range views offer clear visibility into the Site, enabled partly by the low, thin and treeless

hedgerow at the rugby club's northern boundary. However, such views are generally looking back towards the northern built edge of Winsley, and the Site is read alongside the existing clubhouse and prominent rugby posts and flood lights, as opposed to the being viewed as part of the open agricultural landscape.

Fieldwork has confirmed the lack of visibility in longer range views from the north and south, as a refinement to the ZTV analysis [Zone of Theoretical Visibility]*. From an isolated long-range view in the southeast, existing vegetation at the rugby club boundaries may be visible but forms an indivisible part of the distant vegetated horizon in which the Site is indistinct. The breadth and openness of these views, together with the considerable viewing distance, mean vegetation bounding Site and rugby posts within it are indiscernible.*

There would be some localised views, but officers are satisfied the revised negotiated proposal would not be harmful or incongruous in its setting. Officers consider that, given the agrarian appearance of the training facility, and the aforesaid commitments that can be secured through planning conditions, the structure would integrate well with its immediate surroundings and is considered policy compliant.

10.4 Archaeology: In terms of archaeological interest, NPPF paragraph 207 advises that "*where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation*".

In response, the applicant commissioned and submitted an archaeological evaluation report (produced by Avon Archaeology Limited), which provided the results following on-site trial trenching. The report confirmed that none of the trenches contained anything of archaeological interest and concluded that the site has very low archaeological potential.

The Council's archaeologist reviewed the results of the archaeological trial trench evaluation and confirmed that no further archaeology work is required and raises no objections to the proposal.

10.5 Ecology: WCS Policy CP50 requires development proposals to "*demonstrate how they protect features of nature conservation and geological value as part of the design rationale*" and requires all proposals to "*incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development*".

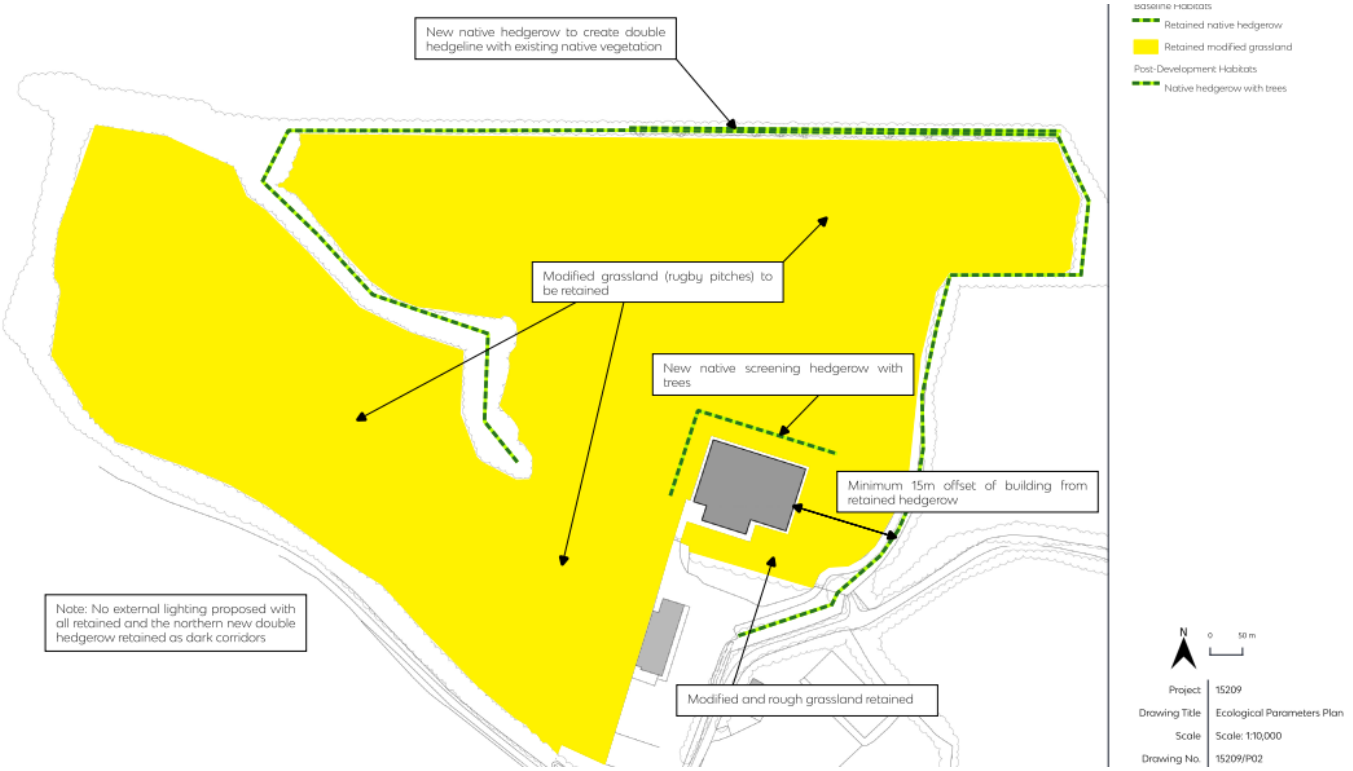
Improving biodiversity is enshrined within the environmental objectives contained within paragraph 8 of the NPPF for achieving sustainable development. The NPPF also requires net gains for biodiversity to be provided including by "*establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehog*" as set out within paragraph 187d.

The subject site is located within the core buffer zones associated with all three qualifying features (lesser and greater horseshoe bats, and Bechstein's bats) of the Bath and Bradford on Avon Bat SAC, and the application has been supported by an Ecological Assessment (produced by Tyler Grange, dated March 2023) and an Ecological Parameter Drawing (produced by Tyler Grange,

dated January 2025).

The bat surveys recorded that the site is used by 12 bat species, including light-sensitive species and those associated with the Bath and Bradford on Avon Bat SAC. However, the development would use an area of poor modified grassland that has negligible ecological value, and with the existing hedgerows to be retained and a 15m buffer to be provided between the existing eastern hedgerow and the proposed building, no ecological features would be affected by the proposal.

An extract of the submitted Ecological Parameter Plan is provided below, which outlines the location of the proposed training facility, the 15m offset to the existing hedgerow and areas of new native hedgerow planting:



The application has been screened under the Habitat Regulations, as the proposal has the potential to result in a significant adverse impact either alone or in combination with other projects on the statutorily designated Bath and Bradford on Avon Bats SAC. The Councils ecologist, as a competent authority in accordance with the Habitats Regulations, carried out an Appropriate Assessment (AA), which concluded that the proposal would result in no adverse effects on the integrity of the site, provided mitigation measures are secured and implemented.

These measures include: no additional external lighting to be installed, the Ecological Parameters Plan to be conditioned, existing hedgerows to be retained and a 15m buffer to be provided between the proposed training facility and the existing hedgerow. Such measures are considered acceptable given the ecological importance of the site and should be secured by way of planning conditions.

Natural England was consulted on the AA and concluded that they were satisfied with the

ecologist assessment of the proposal and raised no objections to the proposal, subject to all mitigation measures being secured.

10.6 Highways: WCS CP57 Criterion xiv requires proposals to satisfy the requirements of CP61 (Transport and New Development) which requires new development to be *"located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives"*. CP61 also requires (criterion ii) that proposals are *"capable of being served by safe access to the highway network*".

NPPF Paragraph 116 sets out clearly that 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, following mitigation, would be severe, taking into account all reasonable future scenarios"*.

The submitted Planning Design and Access Statement confirms that the existing access and on-site car parking area would remain unchanged as part of this application.

The concerns raised within the submitted representations regarding the existing access and traffic are duly noted and the Council's highways officer has offered the following comments in respect to this application:

"*Visibility at the rugby club access is considered to be adequate to the South, however, visibility to the North is restricted by the adjacent hedge to only 15m. Whilst this is substandard for the speed limit in force on Ashley Lane and also, for the recorded 85th percentile speeds detailed within the TA, it is noted that the access was purposely designed to restrict Northerly movements from the rugby club, as a result of the substandard nature of Ashley Lane to the North. In this sense, the design of the access serves a purpose in discouraging left turns out of the rugby club. It is also noted that no collisions have been reported in this vicinity on Ashley Lane.*

Notwithstanding this, the local consultations received are also noted and include objections as a result of parking and traffic concerns, including an increase in traffic to the North on Ashley Lane, with rugby club users purported to already use this route. Having analysed the Automated Traffic Count data, the survey does not support the suggestion that a significant amount of rugby club traffic users use the Northern route on Ashley Lane. Whilst it is likely that some rugby club users do use this route, for the most part, the majority of users appear to access the site from the South as intended and I have no evidence to suggest that a significant amount of additional traffic would use the Northern route on Ashley Lane as a result of these proposals."

The submitted Transport Statement (TS) (prepared by Miles White Transport) identifies the existing traffic flows to and from the club to be centred predominantly on Tuesday, Wednesday and Thursday evenings when training takes place, and on Saturday afternoons when matches are played and on Sunday mornings when youth training takes place.

The TS considers the existing club to benefit from reasonable accessibility by sustainable means of travel, with there being an existing "*pedestrian footway linking the site to Winsley village and a recently constructed shared use path connecting Winsley to Bradford on Avon*" and with there

being bus stops close to the rugby club, providing services between Bath and Warminster (D1 bus service).

It is important to mention that the proposed location of the training facility would be on land previously granted for sports use, with the proposed building being wholly located within the established curtilage of the existing rugby club. Therefore, this proposal is not seeking any change of use of land, as the wider use of the site for sports use is well-established.

With regard to the proposed use of the training facility, it is duly noted that the intended use would predominantly be by the existing sports club, with other sports clubs or community groups to potentially use the building during times when the club is not utilising the facilities.

However, it is not considered that the proposed development would introduce a significant amount of additional traffic, with the proposed training facility being predominantly used as an ancillary building to the existing rugby club, providing training facilities when the existing pitches are not useable. As such, the proposal is not considered to generate a significant increase in additional car parking demand.

The TS assessed the existing parking demand on-site and confirmed on page 22 that "*the maximum parking accumulation on a weekday evening is approximately 35 cars while the maximum parking accumulation over the weekend is approximately 64 cars. Both values are well below the 120-space practical capacity of the existing car parking area meaning there is currently sufficient parking capacity to accommodate existing parking demand*".

Based on the evidence, the demand for on-site car parking at the existing club does not appear to extend beyond the existing 120 car parking spaces. The Council's highways officer however argues that it is necessary for the existing car park to be formally laid out, with the car parking spaces being clearly marked out to make efficient use of the existing car parking area.

The TS also reviewed the potential trips generated by the proposed facility if hired out to users outside of the rugby club using TRICS data, and the Council's highways department considers that based on the internal size of the facility "*which is significantly smaller than a full size pitch, the premise to assess the associated trip generation based on two 5-aside pitches is considered a reasonable approach. The TRCIS assessment shows a relatively modest number of trips and thus parking demand would be expected to remain within capacity of the existing car park*".

The proposal also seeks to provide new on-site cycle parking provision which is supported by officers subject to a planning condition being imposed restricting the use of the training barn to use by the existing rugby and football club only during Saturday afternoons and Sunday mornings during the rugby season, when existing car parking demand is at its highest.

The Council's highways officer has concluded that "*analysis of the submitted data suggests that it is unlikely that the existing car parking capacity would be exceeded following implementation of these proposals. In addition, on the basis of the survey data collected…it does not appear as though the additional traffic generated by the proposed development would cause a significant increase in traffic using the Northern route along Ashley Lane*".

On the basis of the above, no objections have been raised by the Council's highways officer and there is no evidence that the proposal would conflict with NPPF paragraph 116 which states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety.

10.7 Drainage and Flood Risk: WCS CP67 requires all new development to include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (through SuDs). Furthermore, NPPF paragraph 181 requires local planning authorities, when determining planning applications, to ensure that "*that flood risk is not increased elsewhere,* [and] *where appropriate, applications should be supported by a site-specific flood-risk assessment*".

The application site has been assessed for long-term flood risk (using the online Flood risk summary - Check your long term flood risk - GOV.UK) and the site is identified as being in an area at low risk of flooding from surface water and groundwater, with the site being located in Flood Zone 1.

With reference to the submitted Planning Design and Access Statement, the existing clubhouse is serviced by "*on-site infiltration (soakaways) for its surface water, and mains drainage for its foul-water…and that principle is the intention with the training-barn and changing/fitness suite"* (section 7.42-7.43, page 21).

The Council's drainage authority was consulted and raised no objections to the proposal but requests a detailed drainage strategy and a construction management plan are provided and secured by way of planning conditions.

All new connections to Wessex Water's infrastructure would require the separate approval of the undertaker.

10.8 Neighbour Amenity: WCS CP57 requires new development to have *"regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)"*.

Criterion f) of NPPF paragraph 135 requires the creation of places *"that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users"*.

Due to the separation distance between existing residential dwellings and the proposed location of the training facility, which would be positioned over 188m from the closest residential dwelling (to the south of the site), officers are satisfied that the proposed development would not lead to an adverse impact on the amenity of neighbouring occupiers. Furthermore, the application is not seeking to install any additional external lighting. On the basis of the above, no conflict has been found with criterion vii of CP57 of the adopted WCS or paragraph 135f of the NPPF.

10.9 Climate Change and Sustainable Development: WCS CP41 requires new development to

incorporate design measures to reduce energy demand and for major planning applications to be supported by a Sustainable Energy Strategy. In response to this, the applicant has submitted a Sustainable Energy Strategy Statement (SESS) which sets out the sustainable design measures of the proposal, which includes solar panels on the southern roof slope, keeping energy requirements low within the building and the provision of electric vehicle charging points.

No objections have been raised by the Council's Climate Team following the submission of the SESS), subject to a planning condition being imposed requesting the submission of a finial SESS.

11. Conclusion: As set out above, the proposed building has, through negotiations, been reduced in scale and height, resulting in a 40% reduction in overall size compared to the original submission.

The applicant has committed to planting a new landscape belt along the western and northern periphery of the training facility, with additional planting to be provided along the northern site boundary to filter views and to soften the building's visual impact. The applicant is also committed to providing a 15m buffer from the existing hedgerow to the east to safeguard ecological interests along the site's boundary.

For the reasons set out above, the proposed training facility is considered to comply with paragraph 154b of the NPPF, in terms of the proposals impact in the Green Belt.

Whilst it is appreciated that some localised views of the proposed training facility would be available, these would be limited, and views would be seen in the context of the existing clubhouse and associated infrastructure and ultimately it would not appear visually obtrusive or harmful.

It is therefore considered that the proposal would comply with the adopted WCS and the NPPF.

12. Recommendation:

Approve subject to the following planning conditions.

1. The development hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. Application(s) for the approval of all reserved matters specified in Condition 3 shall be made to the Local Planning Authority before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990.

3. No development shall commence on site until full details of the landscaping (to include native planting species, stock sizes, planting density) for the site (in respect of which approval is expressly reserved) have been submitted to, and approved in writing by, the Local Planning Authority:

The development shall be carried out in accordance with the approved details.

REASON: The application was made for outline planning permission and is granted to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 and Article 3(1) of the Town and Country Planning (General Development Procedure) Order 1995.

4. The development hereby permitted shall be carried out in accordance with the following approved plans:

Existing Site Plan, L010 Rev C, as received on 6 June 2023 and; Location Plan, L001, Rev D; Proposed Site Plan, L110 Rev E; Proposed Plans and Section, L120 Rev E; Proposed Elevations, L121 Rev C; Ecological Parameters Plan, 15209/P02; Landscape Mitigation Plan, 251-001 P4, as received on 20 February 2025

REASON: For the avoidance of doubt and in the interests of proper planning.

5. The development hereby permitted shall be carried out in strict accordance with the Ecological Parameters Plan, drawing no. 15209/P02 (produced by Tyler Grange, January 2025) as this set out the ecologically sensitive areas of the site that shall be retained, protected and enhanced where possible and informs the basis for the site layout and shall not be altered at Reserved Matters without detailed justification based on additional habitat and wildlife species surveys.

REASON: To protect the ecologically sensitive features of the site.

6. No development shall commence on site until a scheme for the discharge of surface water from the site, incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be first brought into use until surface water drainage has been constructed in accordance with the approved scheme.

REASON: In order that the development is undertaken in an acceptable manner, to ensure that the development can be adequately drained.

7. No development shall commence on site (including any works of demolition), until a Construction Method Statement has been submitted to, and approved in writing by, the Local Planning Authority, which shall include the following:

a. The parking of vehicles of site operatives and visitors.

b. Loading and unloading of plant and materials.
c. Storage of plant and materials used in constructing the development.
d. The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate.
e. Wheel washing facilities.
f. Measures to control the emission of dust and dirt during construction.
g. A scheme for recycling/disposing of waste resulting from demolition and construction works.
h. Measures for the protection of the natural environment.
i. Hours of construction, including deliveries

The approved Statement shall be complied with in full throughout the construction period. The development shall not be carried out otherwise than in accordance with the approved construction method statement.

REASON: In order that the development is undertaken acceptably, to minimize detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.

8. No development shall commence above ground floor slab level on site until details and samples of the proposed green cladding material to be used for the external walls and roofs have been submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall be carried out in accordance with the approved details.

REASON: In the interests of visual amenity and the character and appearance of the area.

NOTE: The applicant is advised to review the colour guidance produced by North Wessex Downs National Landscape (or similar) when selecting the cladding colour for the building roof and walls to ensure the cladding for the building helps to reduce its visual impact into the landscape.

9. No development shall commence above ground floor slab level on site until a final Sustainable Energy Strategy has been submitted to and approved in writing by the Local Planning Authority explaining the low-carbon approach of the scheme taken in the technical design stages, including details of energy efficiency, low-carbon technologies and integrated renewable energy generation benchmarked against the relevant Building Regulations. Thereafter, the development shall be carried out in accordance with the agreed details.

REASON: To ensure that the objectives of sustainable development set out in policies CP41 and CP57 of the Wiltshire Core Strategy are achieved.

10. No development shall commence above ground floor slab level on site until a scheme for the formal marking/laying out of the existing car park for a minimum of 120 car parking spaces, shall be submitted to and approved in writing by the local planning authority. The works shall be carried out in accordance with the agreed detailed details prior to the first use of the building hereby approved.

REASON: To ensure adequate car parking is available on site at all times in the interests of highway safety.

11. No development shall commence above ground floor slab level on site until details of secure covered cycle parking facilities have been submitted to and approved in writing by the local planning authority. The submitted details shall accord with dimensions, access, location, design and security principals laid out in Appendix 4 of Wiltshire's LTP3 Cycling Strategy. These shall thereafter be provided in accordance with the approved details and made available for use prior to the first use of the development hereby permitted and shall be retained for use thereafter.

REASON: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than the private car.

12. No construction lighting shall be used throughout the construction phase of the development, and no construction work shall take place outside daylight hours.

REASON: The introduction of artificial light/noise disturbance is likely to mean such species are disturbed and/or discouraged from using established flyways or foraging areas, and such disturbance constitutes an offence under relevant wildlife legislation.

13. No external lighting shall be installed on site until details of the existing and proposed new lighting have been submitted to and approved by the local planning authority in writing. The submitted details shall demonstrate how the proposed lighting would impact on bat habitat compared to the existing situation and show the type of light appliance, the height and position of fitting, illumination levels and light spillage.

The plans shall be in accordance with the appropriate Environmental Zone Standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 'Bats and artificial lighting at night', issued by the Bat Conservation Trust and Institution of Lighting Professionals.

The approved lighting shall be installed and maintained in accordance with the approved details and no additional external lighting shall be installed.

REASON: In the interests of the amenities of the area, minimise unnecessary light spillage above and outside the development site and to avoid illumination of habitat used by bats.