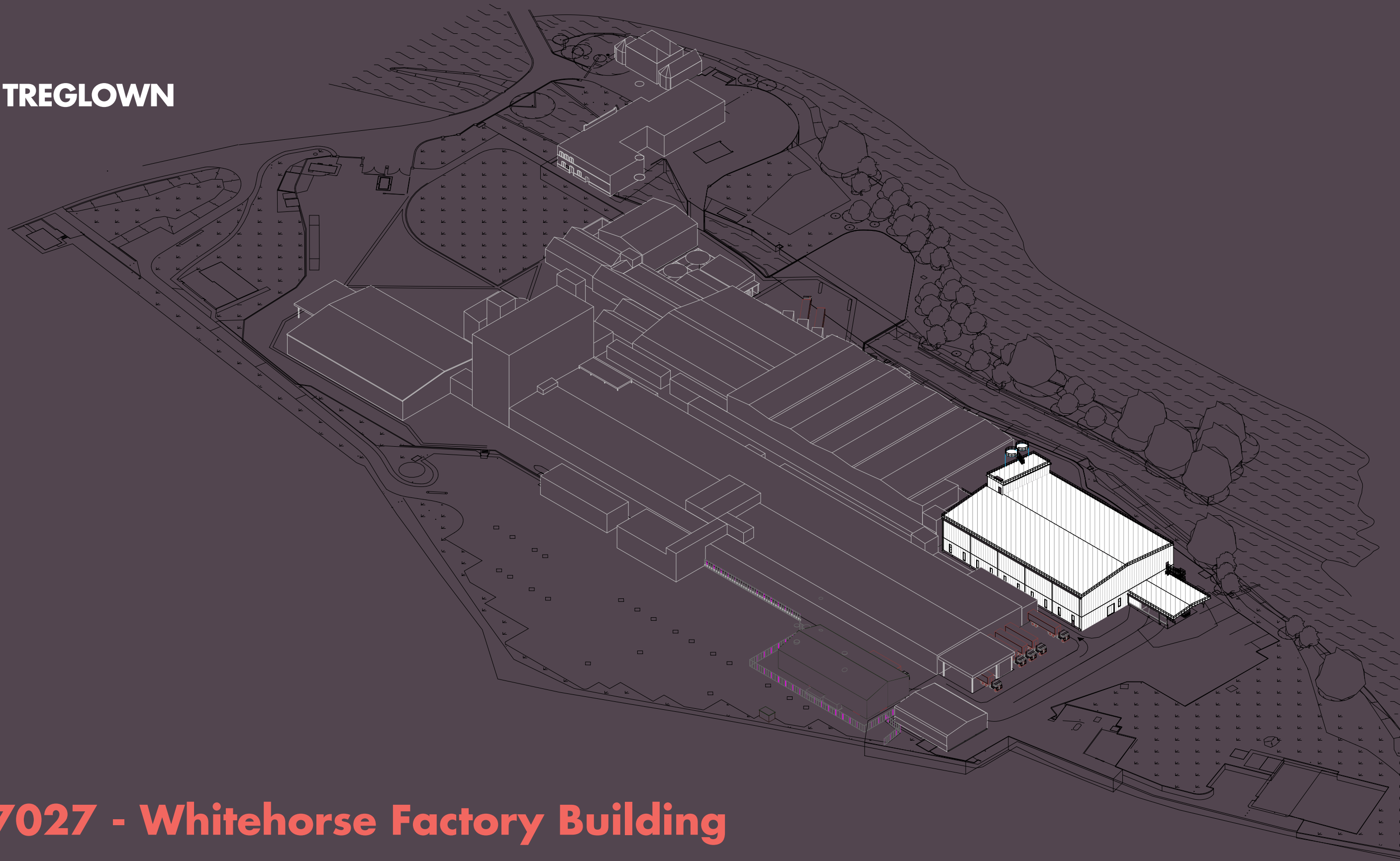


STRIDE TREGLOWN



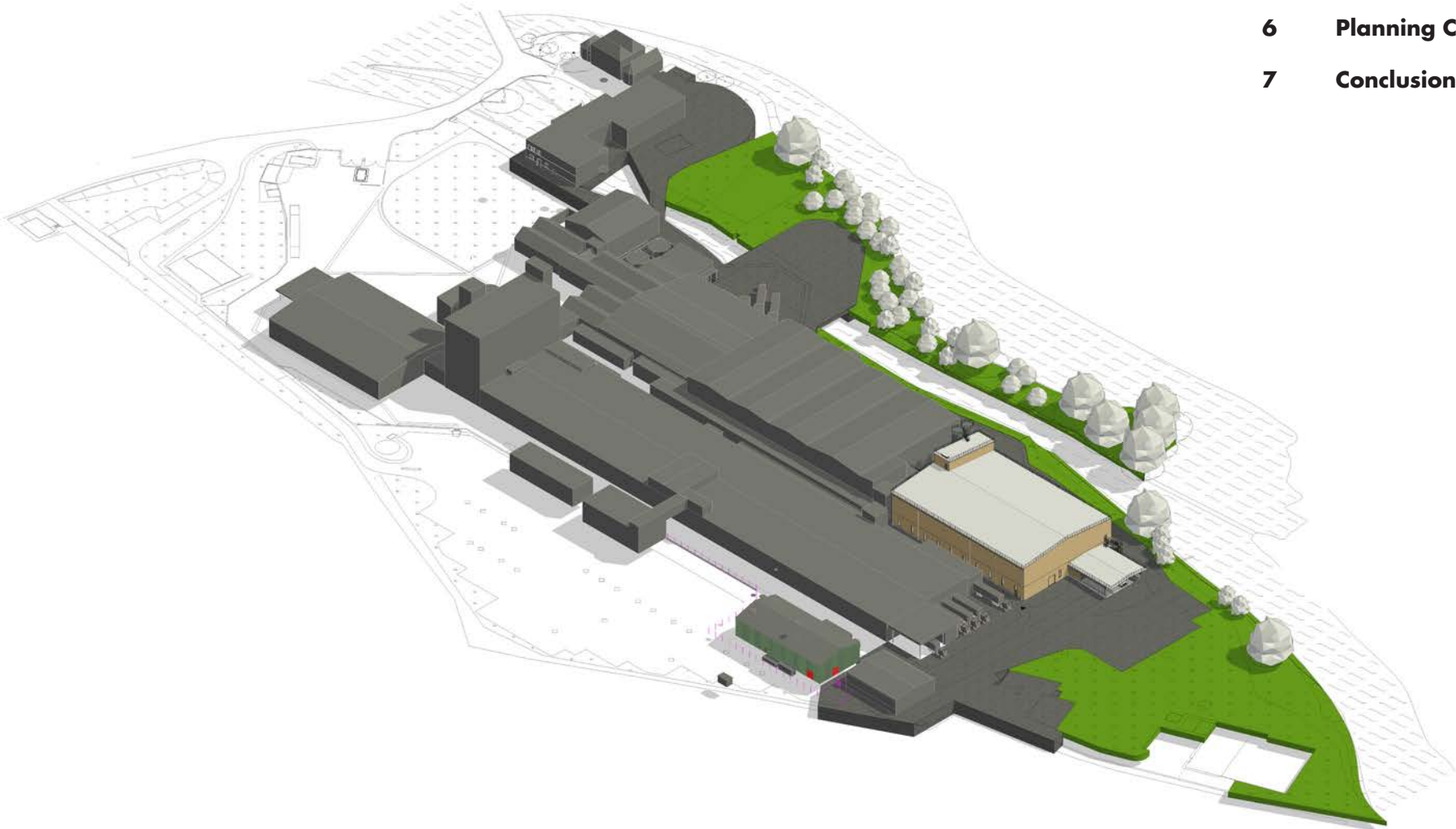
157027 - Whitehorse Factory Building

Planning, Design & Access Statement | November 2025

This integrated Planning, design and Access Statement has been prepared by Stride Treglown to support an application for full planning permission on behalf of Cereal Partners UK (CPUK) for the construction of a new factory building and associated works at their factory site in Staverton, Trowbridge BA14 6PG.

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1 Introduction

1.1 Introduction

Cereal Partners UK is a joint venture between Nestle and General Mills and supports the production of some of the UK's most iconic breakfast cereals, including Shreddies and Shredded Wheat. To support future growth and ensure long-term operational resilience, CPUK is proposing an expansion of the Staverton site through the construction of a new manufacturing building in the north-east corner of the existing premises.

This strategic investment will significantly enhance production capacity and operational efficiency, enabling CPUK to respond more effectively to evolving market demands. The development is expected to generate substantial economic benefits for the local community, including the creation of a significant number of new employment opportunities.

By expanding the existing food manufacturing site, CPUK is investing in its future in Staverton. The proposal will generate new employment opportunities and will secure future employment in Trowbridge and the surrounding area. This will add to the 145 factory roles and 45 office-based support function jobs already at their existing site. The proposals will also create jobs as part of the construction phase. The proposal involves significant investment into enhancing this part of this designate employment area with CPUK investing a total of £67m into the expansion of the site.

A Pre-application enquiry was submitted to Wiltshire Council in September 2025 (reference: ENQ/2025/01199). Officers considered the proposal to be acceptable in principle, recognising the contribution it would make to strengthening the role of Trowbridge as an employment, administration and strategic service centre.

This document describes the proposals, relevant planning history and planning policy, and provides a planning assessment of the proposal against the development plan.

In addition to this Planning, Design & Access Statement, the following documents and drawings form part of this application for full planning permission.

- Covering Letter
- Completed application forms
- Existing and proposed plans and elevations
- Transport Statement
- Preliminary Ecological Appraisal
- Statement of Community Involvement
- Noise Impact Assessment
- Air Quality Assessment
- Landscape and Visual Impact Assessment
- Landscaping Plan
- Flood Risk Assessment
- Heritage Statement (incorporated within Planning, Design & Access Statement)
- Land Contamination Assessment

Description of development;

Construction of new factory building (use class B2) and associated works/infrastructure (2no. Silos)



Existing Site Photography

2 Site Appraisal

2.1 Site Appraisal

Site Description and Location

The existing CPUK food manufacturing campus is situated on the eastern side of the B3105 road and on the northern outskirts of the village of Staverton, Trowbridge. The main industrial buildings and service yards are located to the south of the site.

The area of the campus within which the new factory building will be accommodated is located to the north east of the campus. The area consists of existing hardstanding (currently used as a service yard) and is bound to the south and west by existing factory buildings, the River Avon to the north, and external storage to the east.

The wider Staverton site consists of Flood Zones 2 and 3 (Flood Zone 3 being the highest probability of flooding with an annual probability greater than 1%). The image below indicates that the new factory building would be located within flood zones 2 and 3.

The site does not lie within a National Landscape Area (formerly Areas of Outstanding Natural Beauty), a National Park, a Site of Special Scientific Interest or any other EU designated site (Special Protection Areas or Special Areas of Conservation).

There are no designated heritage assets within the red line of the proposed application site. The designate heritage assets of relevant to the consideration of these proposals are identified in the image adjacent and listed as follows;

- Weselyan Chapel – Grade II
- The Old Bear Inn – Grade II
- Gates, gate piers and overthrow at Churchyard of Church of St Paul – Grade II
- Church of St Paul – Grade II
- Road Bridge – Grade II

Relevant Planning History

The existing factory benefits from a wealth of positive planning history. Two of the most recent applications relate to the extension of existing buildings;

- Application Ref: 17/10332/FUL – Extension to existing wheat intake building – approved in December 2017
- Application Ref: 17/02383/FUL – Installation of replacement water tanks – approved in May 2017

The planning officer's report for 17/02383/FUL confirmed that the site is located within an established area of Staverton, identified as a small village under policy CP7 of the Wiltshire Core Strategy. Officers acknowledged that the proposals would be situated within the built-up area of the CPUK factory and would support existing employment land, therefore considered acceptable in principle.

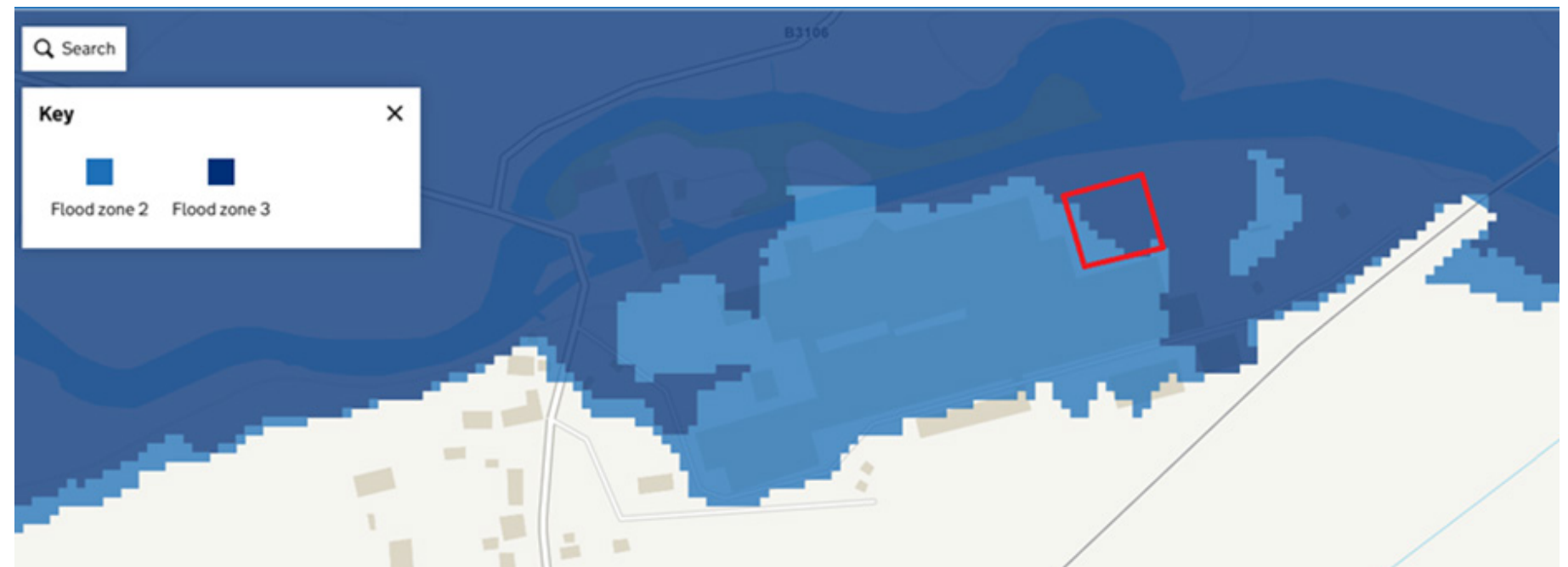


Image indicating extent of Flood Zone (Source: Environment Agency Flood Map for Planning)



Image indicating location of nearby heritage assets

2.2 **Site Appraisal**
Site Images



3 Proposed Development

3.1 Proposed Development

Overview

The proposed development will provide a circa 2400m² extension to the existing factory at Staverton, producing 'ready to eat' breakfast cereals. The new building will provide additional space to receive raw materials and to produce and package finished goods for onward transportation to distribution centres. The expansion to the factory is expected to lead to an increase in staff numbers of approximately 50 new staff and to result in approximately 21 additional deliveries daily. The aim of the new structure is to return the levels of production on site back to historical peak levels from around 2020.

The new building will be located in a currently vacant area of the campus, away from the public highway and nearby dwellings whilst maintaining appropriate access and turning space for HGVs. Due consideration has been given to maintaining appropriate separation distances from the nearby watercourse and tree roots.

The proposed building has a total GIA of 2400sqm (comprising of ground floor and mezzanine) with a building height of 20m.

To achieve increased production the manufacturing process needs to flow through the building. The supply of goods will occur at one end of the building and packaging and distribution takes place at the other. The flow through the building is linear to accommodate the production lines along the length of the factory.

Movement and Access

The application site is considered to have good access to the local highway network.

The site will be accessible via New Terrace, which is a single carriageway road subject to a 30mph speed restriction. A footway runs along the eastern side of the carriageway and is approximately 1.5m in width. New Terrace links to Trowbridge to the south. To the north the site connects to Holt via the B3106, and Bradford on Avon via the B3107.

Footways are not provided to north of the CPUK site. Both the weighbridge access and the staff access provide dropped kerbs to aid the movement of pedestrians.

The existing car park provides a total of 154 parking spaces, of which two are blue badge spaces, and six EV parking spaces. No additional vehicle parking is proposed as part of the proposed development as it is considered that the increased demand can be absorbed through the existing provision.

Within the existing car park, 10 sheltered Sheffield stands are provided with spaces for up to 20 cycles. Based on the existing and proposed level of staff, this level of cycle parking is considered to be appropriate. As discussed in Section 1, the site employs a total of 200 members of staff, and the proposed extension will employ 50 additional members of staff. However, it should be noted that the site operates in shifts and that the site does not operate with all members of staff on site at any given time.

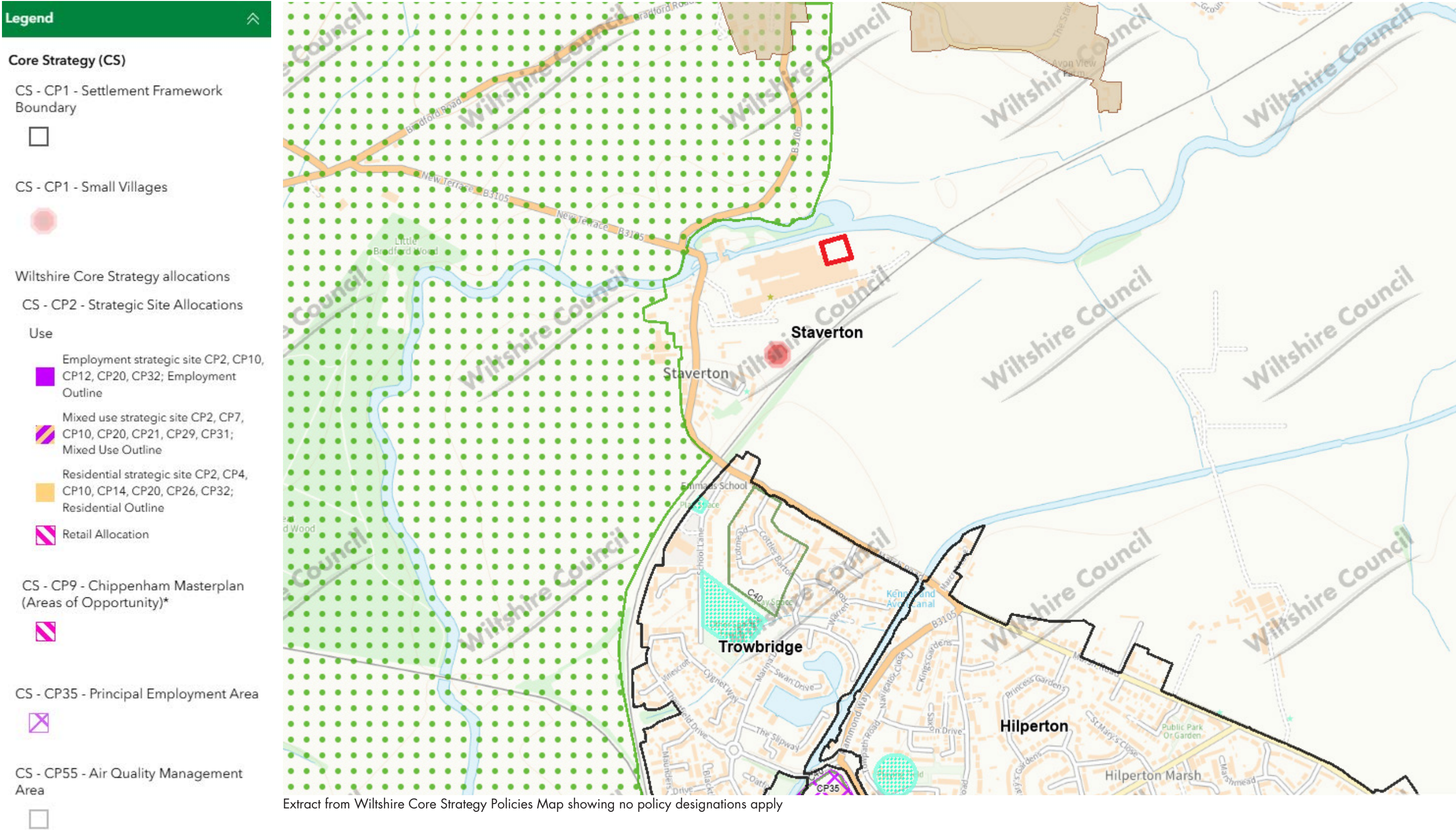
The site currently has deliveries on a 24-hr basis and no delivery restrictions are in place. The proposal seeks to continue to allow deliveries on a 24-hr basis.



CGI of proposed new factory building

4 **Planning Policy Context**

The following section of this statement sets out the current national and local planning policies which are relevant to the determination of this application.



4.1 Planning Context

National Planning Policy Framework (NPPF 2024)

First published in 2012, the NPPF sets out the governments planning policies for England and how these are expected to be applied. A presumption in favour of sustainable development remains at the heart of national planning policy.

NPPF Paragraph 80 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, taking into account both local business needs and wider opportunities for development.

Under Chapter 8 – Promoting healthy and safe communities, paragraph 91 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;

Paragraphs 108 and 109 state that when assessing specific applications for development it should be ensured that;

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Paragraph 110 confirms that applications for development should;

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; Registered in England No8347914. Registered Office: 21 Bampton Street, Tiverton, Devon, EX16 6AA XL Planning Ltd 1A Fore Street Culmpton Devon EX15 1JW

- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Paragraph 117 emphasises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-development or 'brownfield' land.

Essentially, as confirmed within Paragraph 118, planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes and giving substantial weight to the value of using suitable brownfield land within settlements and promoting and supporting the development of under-utilised land and buildings.

Chapter 12 relates to achieving well-designed places, with paragraph 124 stating that 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.

Paragraph 127 requires that planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

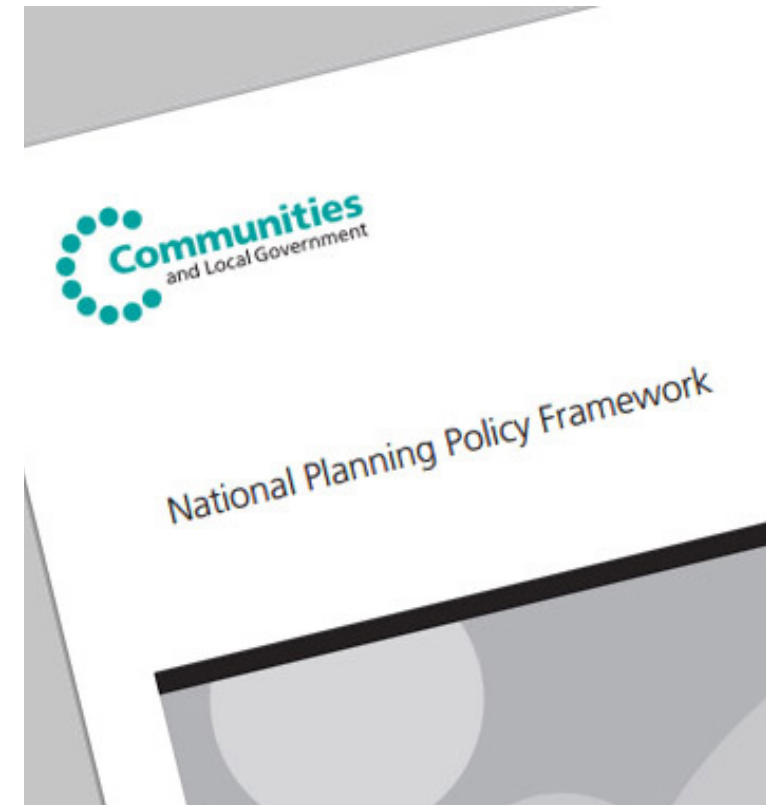
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

- f) create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 174 of the NPPF seeks to steer new development to areas with the lowest risk of flooding from any source. With that in mind, a sequential analysis of other reasonably available sites appropriate for the proposed development accompanies this application for planning permission.

The above policies are a material consideration in the determination of the application alongside the Planning Practice Guidance (PPG).



4.2 Planning Context Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise.

The site falls wholly within the administrative boundary for Wiltshire Council. The statutory development plan therefore consists of Wiltshire Core Strategy 2006-2026.

Wiltshire Core Strategy 2006-2026

The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026.

The adopted Core Strategy sets out a number of strategic objectives which seek to create the right environment to deliver economic growth, delivering the jobs Wiltshire's population needs locally, and taking a flexible and responsive approach to employment land delivery. Strategic Objective 1 (Delivering a thriving economy) supports the delivery of additional opportunities for employment provision, over and above those identified at allocated sites, in the Principal Settlements, Market Towns and Local Service Centres and for rural based businesses.

Site Specific Policies

The site is located within the built-up area of Staverton which is identified as a small village in accordance with Policy CP7 of the Wiltshire Core Strategy. Core Policy 7 states that over the plan period, 2 to 3 ha of new employment land will be provided. Although not designated as a Principal Employment Area as defined by Policy CP35, the site forms part of an existing employment site safeguarded by Policy CP35 for its contribution to the Wiltshire economy. Located within the built-up area of the factory site, the proposed development would represent efficient re-use of brownfield land consistent with the aims and objectives of the NPPF and policy CP35

which confirms that proposals for the renewal and intensification of employment uses will be supported.

The following policies are also considered relevant to the proposed development;

Core Policy 36 (Economic Regeneration) confirms that regeneration of brownfield sites will be supported in the Principal Settlements, Market Towns and Local Service Centres where the proposed uses help to deliver the overall strategy for that settlement

Core Policy 50 (Biodiversity and Geodiversity) requires development proposals to demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. In that vein, an Ecological Impact Assessment prepared by SLR Consulting is submitted in support of this application confirming that no biodiversity or habitat features will be lost as part of the proposed development.

Core Policy 51 (Landscape) seeks to protect, conserve and enhance Wiltshire's distinctive landscape character and development '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. Accordingly, a Landscape and Visual Impact Assessment prepared by Goodger Design Associates is submitted in support of this application for planning permission, the contents of which are reviewed in Section 6 of this report.

Policy 56 (Contaminated Land) confirms that development proposals which are likely to be on or adjacent to land which may have been subject to contamination will need to demonstrate that measures can be taken to effectively mitigate the impacts of land contamination on public health, environmental quality, the built environment and amenity. A Phase 1 Site Investigation prepared

by Prime Design is submitted in support of this application confirming that the application site is suitable for its proposed use.

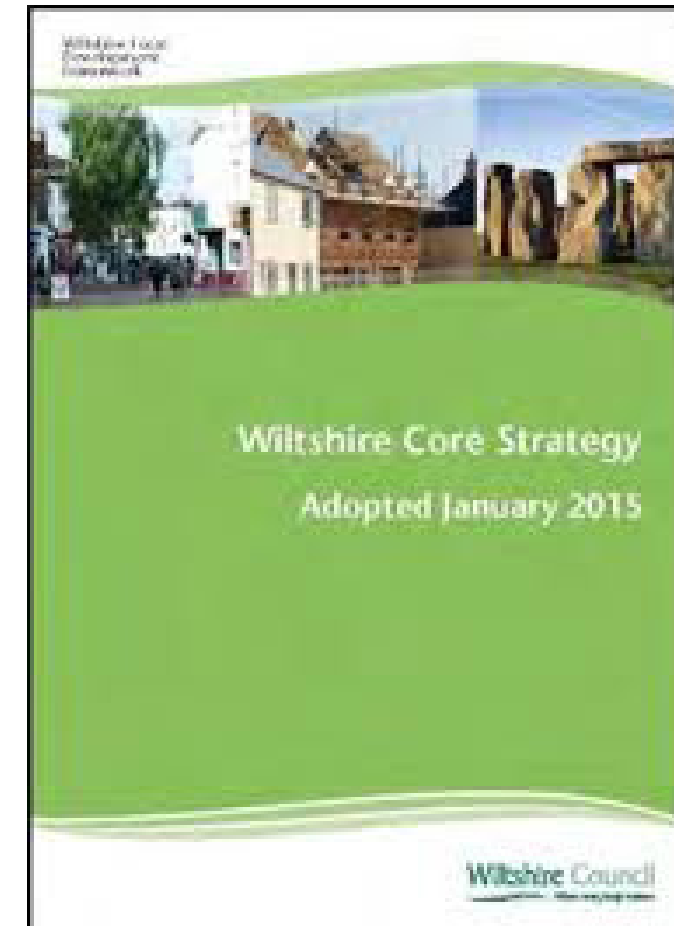
Core Policy 57 (High Quality Design and Place Shaping) requires a high standard of design in all new developments including through retaining and enhancing existing important features and being sympathetic to and conserving historic buildings and landscapes.

In terms of historic buildings and landscapes, Core Policy 58 (Ensuring the Conservation of the Historic Environment) aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. The policy seeks to conserve designated heritage assets and their settings.

Core Policy 61 (Transport and New Development) confirms that new development should be located and designed to reduce the need to travel by private car, and to encourage the use of sustainable transport alternatives.

Furthermore, Core Policy 62 (Development Impacts upon the Transport Network) requires development proposals to provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. Accordingly, a Transport Statement prepared by SLR consulting accompanies this application for planning permission, confirming that the impact of the proposed development on the local highway network will not be severe.

Core Policy 67 (Flood Risk) requires all new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.



5 Design and Access Statement

5.1 Site Appraisal

Site Considerations

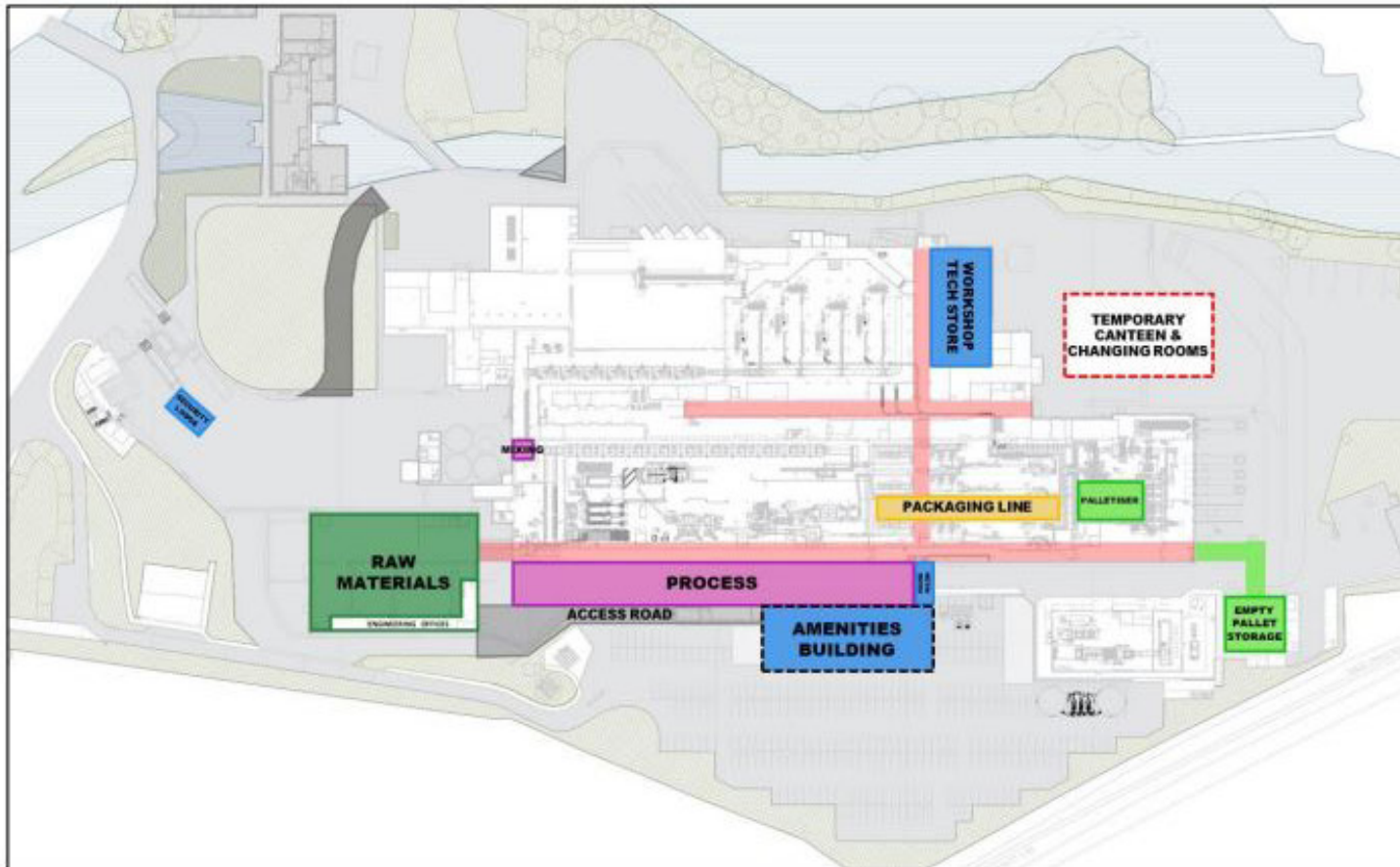
A South location was initially favored as a natural lateral extension to the linear process diagram of the existing factory production lines together with its proximity to the personnel and visitor entrance and the staff amenities infrastructure. However the option came with a high degree of complexity in construction sequencing and infrastructure adjustments and greater potential for disruption of existing operations. The decision was taken to explore in more detail a north location in an open tarmacked area adjacent to the river.

The north location offers several immediate advantages with relatively few interfaces between the existing factory during the construction phase for the new process and raw material storage building, in particular:

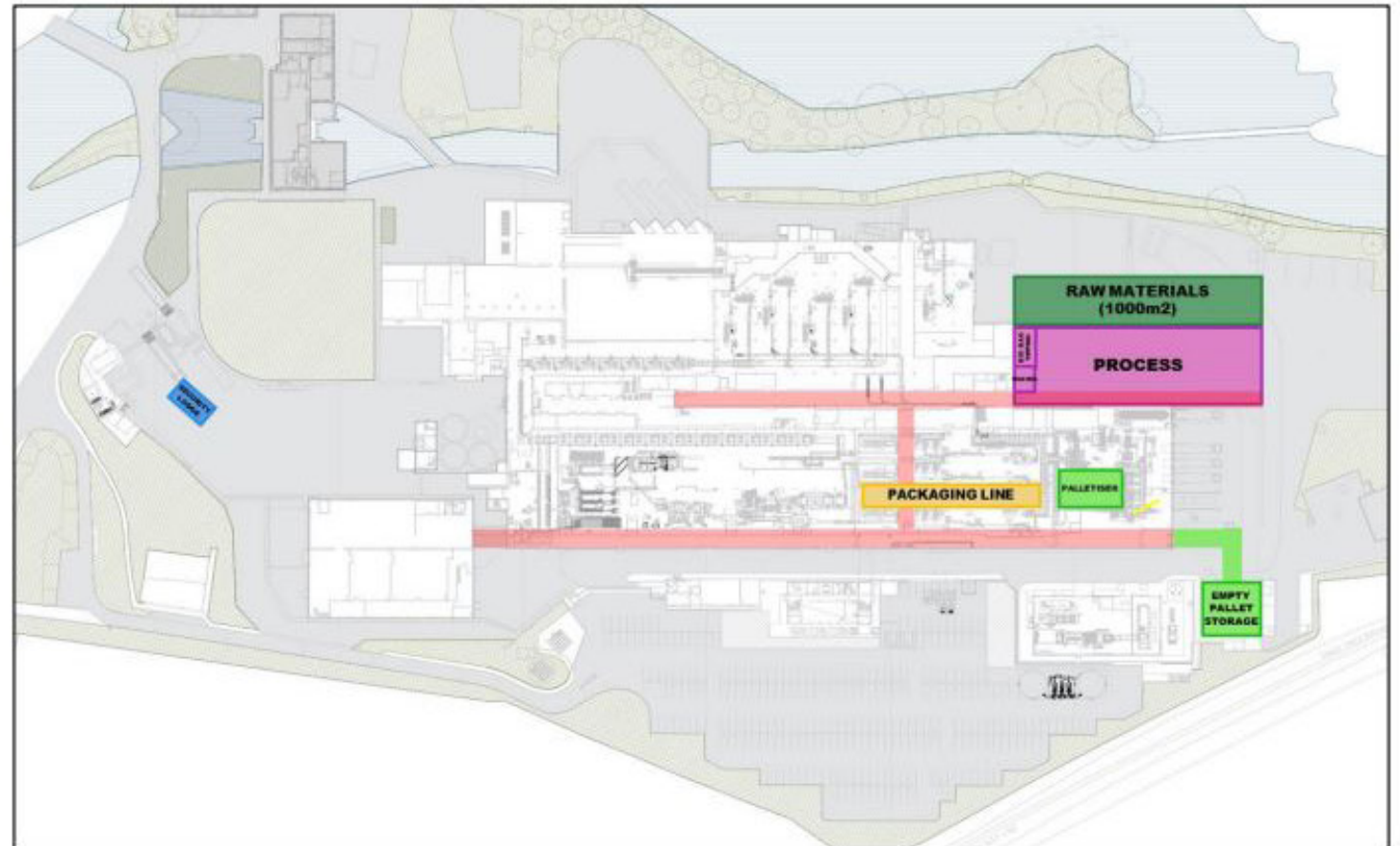
- Located in a currently vacant part of the site, already hard-standing.
- Little or no modification or demolition of existing buildings or infrastructure required.
- Provides greater segregation from ongoing factory operations, minimising interference during construction.
- No change to current pedestrian and vehicle flows.
- Link available to the existing factory building on the eastern side.

This north location option was developed into a firmer concept building by CCA to an RIBA stage 2 level of detail (Concept Design). The proposal was for a ca 2400m² stand-alone extension in the Northeast corner of the existing production plant.

SOUTH



NORTH



5.2 Design Principles

Design development

Due to strategic product developments for the Cereal Partners Worldwide (CPW) network, in 2022 the current capacity of the facility was reviewed within the constraints and possibilities of the existing site.

A fundamental rethink was initiated on how the site will evolve in the near and mid-term future and this led to two potential sites being explored, one linear configuration to the south of the existing factory and another to the northeast corner. Initial concept studies were carried out by Concept Consult Architects (CCA) of Switzerland on behalf of CPW. This exercise was instrumental in clarifying the business objectives for the Staverton factory and identified the key areas of intervention for sustainable development in the foreseeable future.

A South location was initially favored as a natural lateral extension to the linear process diagram of the existing factory production lines together with its proximity to the personnel and visitor entrance and the staff amenities infrastructure. However, the option came with a high degree of complexity in construction sequencing and infrastructure adjustments and greater potential for disruption of existing operations. The decision was taken to explore in more detail a north location in an open tarmacked area adjacent to the river.

The north location offers several immediate advantages with relatively few interfaces between the existing factory during the construction phase for the new process and raw material storage building, in particular:

- Located in a currently vacant part of the site, already hard-standing.
- Little or no modification or demolition of existing buildings or infrastructure required.
- Provides greater segregation from ongoing factory operations, minimising interference during construction.
- No change to current pedestrian and vehicle flows.
- Link available to the existing factory building on the eastern side.

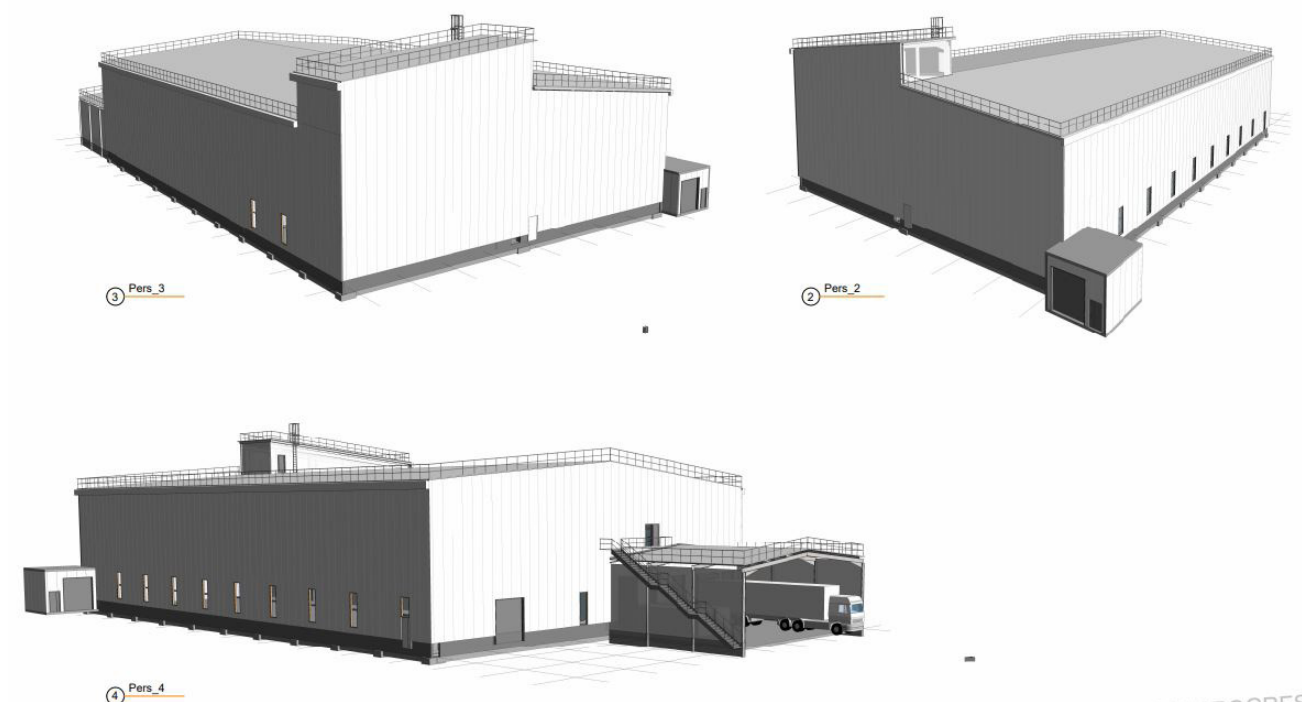
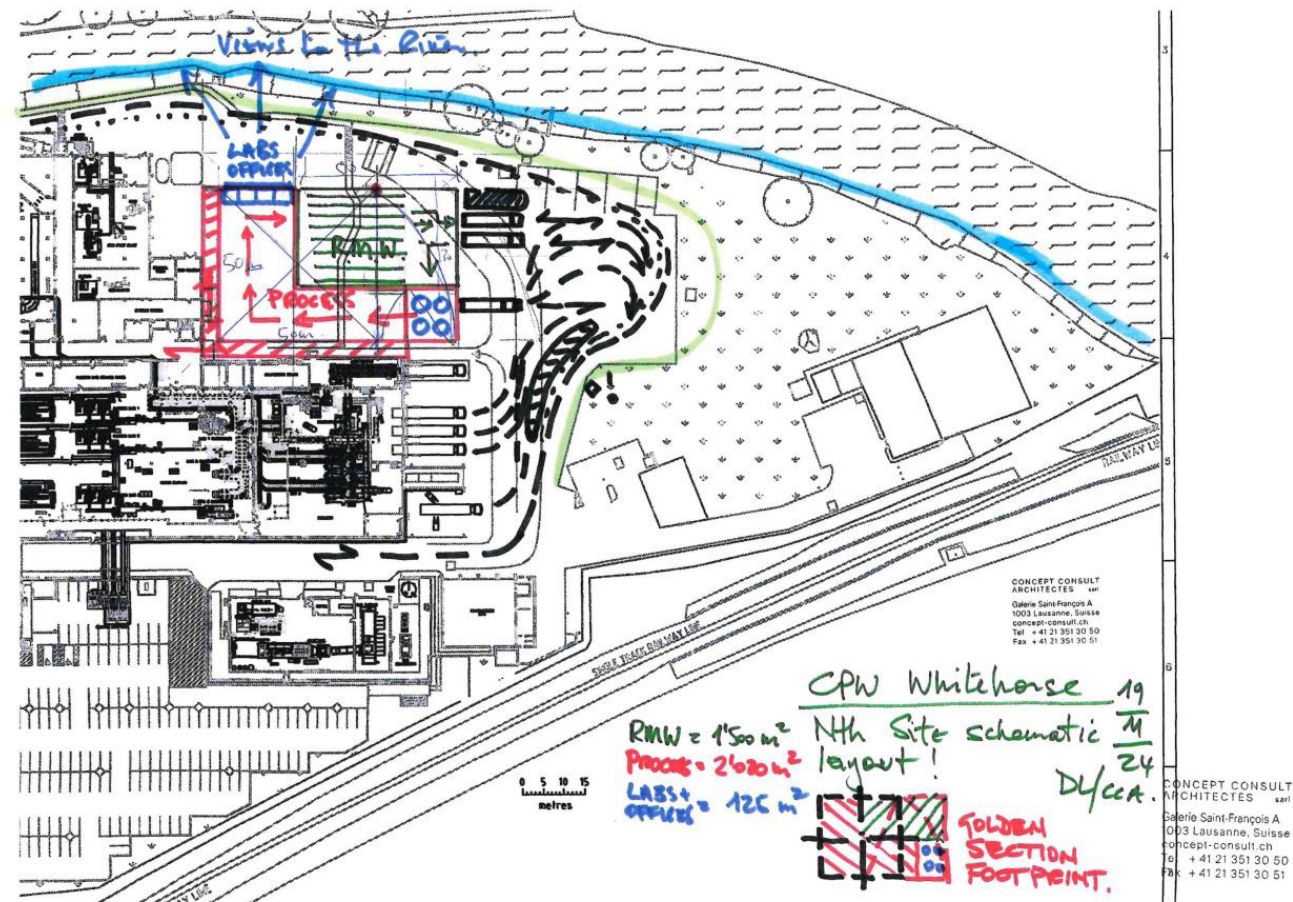
This north location option was developed into a firmer concept building by CCA to an RIBA stage 2 level of detail (Concept Design). The proposal was for a ca 2400m² stand-alone extension in the Northeast corner of the existing production plant.

Design Principles:

- Lean Manufacturing Flow for process efficiency and minimal cross flows
 - Based on functional needs with non-subjective, unimposing architecture and a timeless appearance.
 - Hygienic Design: Cleanability ensured with no inaccessible areas and durable finishes.
 - Pre-finished materials (sandwich panels) for speed and quality
 - Simple and flexible for future changes.
 - Optimised size and volume, avoiding overdesign
 - CPW corporate Identity elements will be integrated through use of colours, images and logos.
 - Safety considerations: No roof-mounted plant / Edge protection on all roofs / Roof access by staircase only, no ladders / Separation of people and material handling flows
 - Double-skin roof system for durability.
 - Windows in production areas to provide natural light to work locations
 - No rooflights for thermal integrity, safety and durability.
- fully sprinklered building, integrated with the existing factory's system to ensure safety for people and robust asset protection.

As a result of the requirement for a new process volume certain internal change will be implemented with the existing factory to improve organisational flows and functionality, these are:

- Creating a new line maintenance workshop
- Creating a new link between the existing buildings and the new process / RMW hall.
- General renovations and upgrades to the northeast corner of the existing factory
- Creation of new Silos for the process requirements
- Partial modification to the internal vehicle and people flows zones with associated signage
- New Handwash station



WORK IN PROGRESS

5.3 Building Form

Design Principles:

Due to the required production process a single 'tower' element was required to provide a gravity fed system known as the Milling Tower. This is the tallest element of the building containing 5 levels as well as roof access.

The components of the building are

-Process hall. This is the main manufacturing hall of the building and contains the process equipment. This is a complex arrangement with machinery on multiple levels. A large open space is required. The process machinery will be installed with its own access stairs and levels within the space. To the west there are three minor services spaces on the ground floor.

-Milling tower. This is located on the northeast corner of the building and comprises 5 levels accessed via a protected stairway. The stairway provides access to the roof levels.

-Tipping area. Located adjacent the Milling tower, this is a full height space where the product mixes are brought into the process.

-Warehouse. This is a full height space with a large mezzanine floor where air handling units are located. The warehouse will include racking for storage.

-Loading Bay. To the east side a loading dock allows for delivery of materials. This is overseen by a logistics office which has windows to oversee arrivals as well as a view of the river

Use and Amount

The new factory falls into the Use Class B2. The factory has a gross internal floor area of...m2 and an internal ground floor footprint, including new link building, of 2,400 m2.

The building houses machinery for the production of cereal products. In addition, on the ground floor there are associated spaces including control room, spare parts room, line maintenance room. To the west of the new building a new enclosed link is provided to connect with the existing factory. To the northwest elevation new silos are housed.

Access

The new building is served by an existing vehicular route which enters via the current main site control point. The existing vehicular route alongside the river to the north of the factory is maintained. Pedestrian access is from the new link on the western side to the existing factory.

The new building has level access provided from the existing factory and ramped access for lorries to the loading bay and from the loading bay into the new building.

Scale

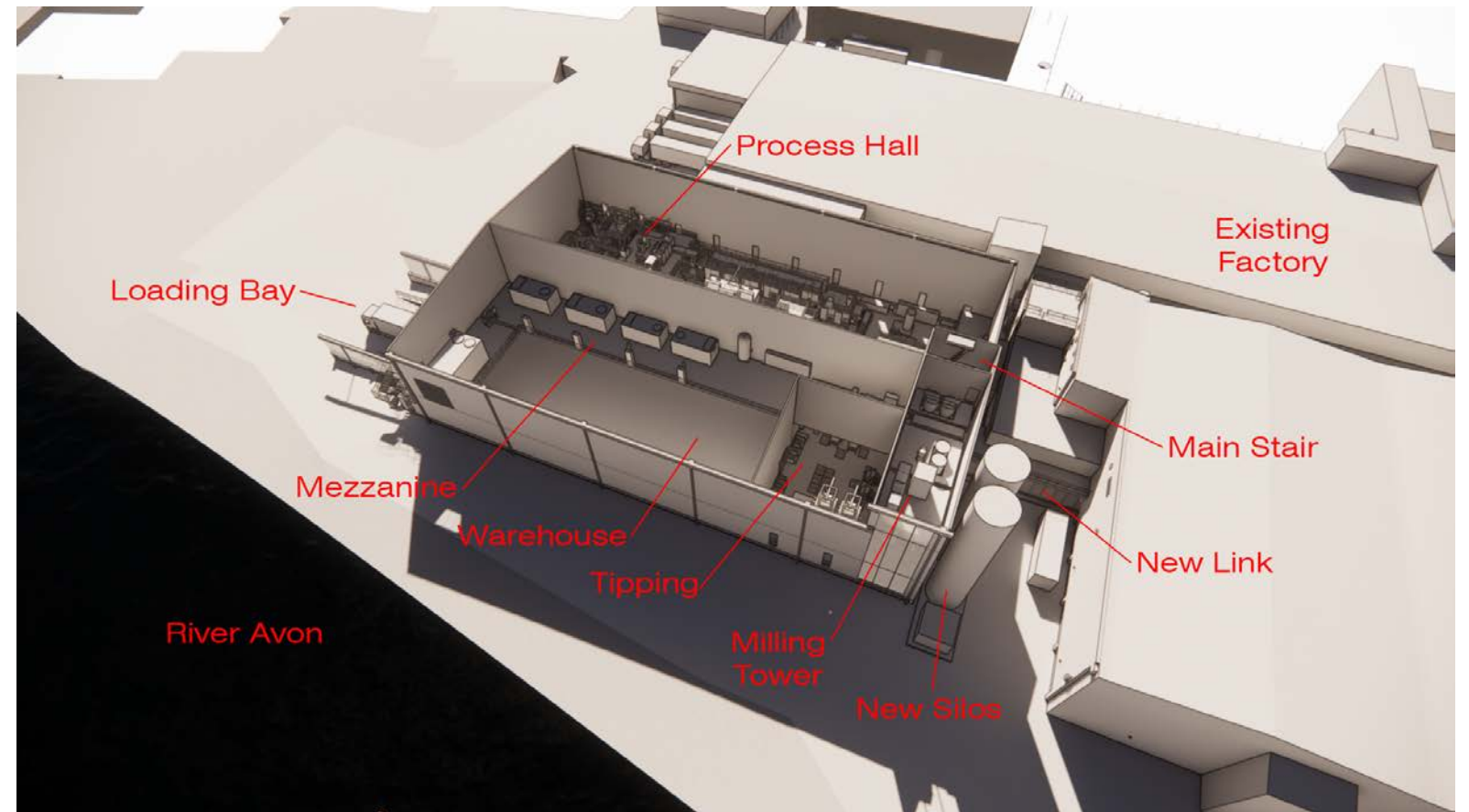
The scale of the building is dictated by the requirements of the production process and the warehouse storage. A simple portal frame building is provided with a central west to east division which separates warehouse from production facility. The roof over the warehouse and process hall is kept as low as possible as opposed to matching the required height of the Milling Tower which is allowed to rise above the main roof.

Lighting.

Internally the building is provided with lighting as required for the production facility. Externally a minimal amount of lighting is provided as required by safety requirements.

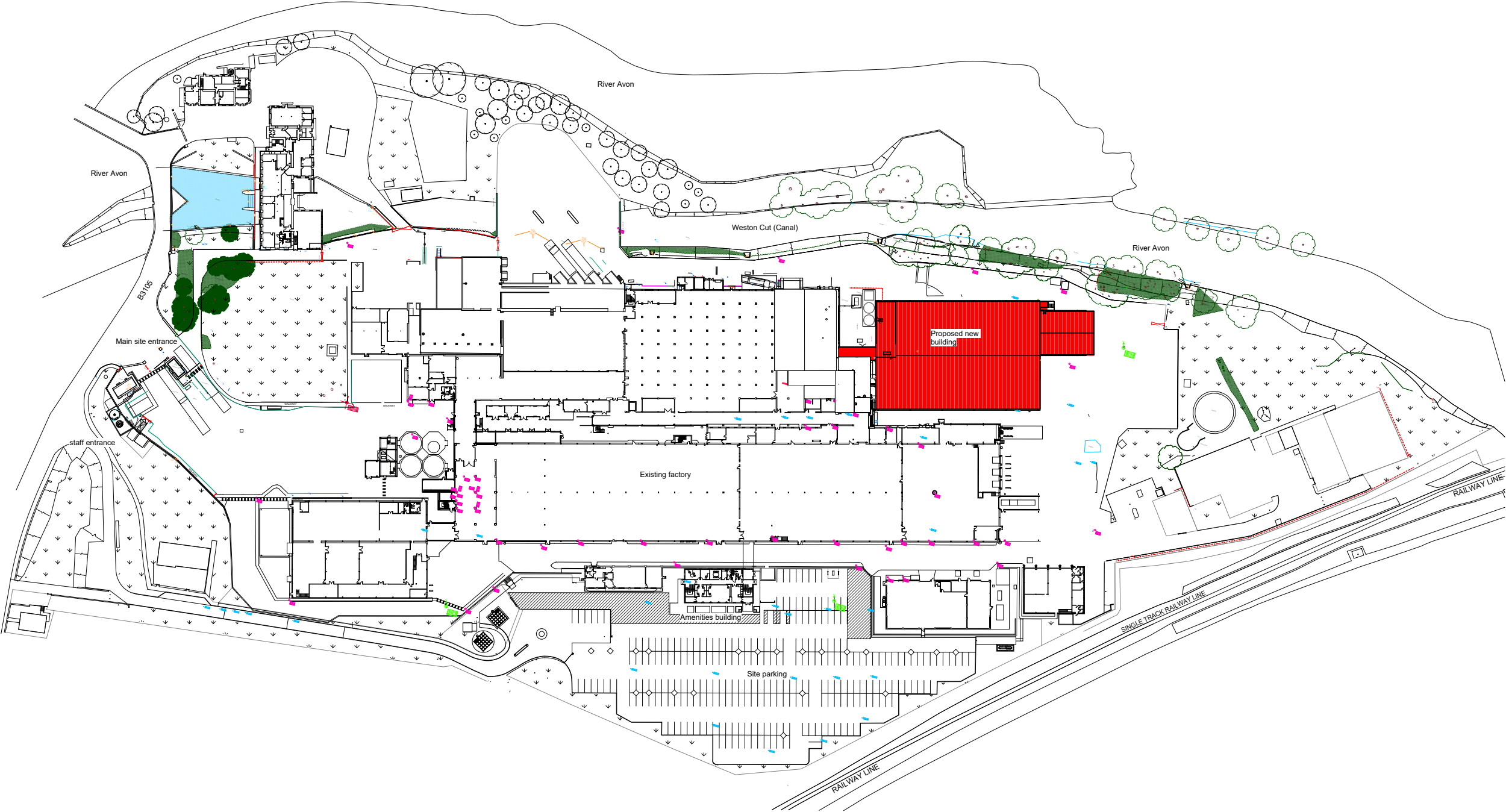
Parking.

The existing site parking is maintained. Lorries will be located under cover of the canopy when unloading and exit the site via the route they entered. No new car parking is required due to the new building.



Proposed Building Room Functions - STL

5.4 Building Form
Proposed Site Plan



5.5 Building Form

Materiality

Propped portal steel frame for structural efficiency and speed of construction

Upper levels in concrete structure where required for fire resistance, ensuring compliance with fire safety and hygienic standards.

Walls and ceilings: pre-finished non-combustible sandwich panels for fire safety and hygiene.

Process platforms in stainless steel with tailored design for hygienic requirements and to provide safe permanent access to all required locations for operations and maintenance needs

Following completion of the Concept Design by CCA Architects, CPW commissioned Stride Treglown Architects to develop the proposal to RIBA stage 3 (Spatial Coordination) and stage 4 (Technical Design)

Appearance.

The building is a simple steel frame portal structure with a raised element which houses the Milling Tower. The loading bay is a lower covered structure allowing unloading of goods under weather protection. The majority of the structure is steel, however due to fire resistance requirements a number of internal floors and columns are provided in insitu concrete.

Finishes

The building elevations are clad in prefinished insulated sandwich panels. These provide a clean, smooth internal finish as required by the hygiene standards. Tall windows are provided at regular intervals to break up the façade and to provide daylighting to the interior. To the north side of the Milling Tower a full height element of translucent polycarbonate insulated wall is added to provide daylight to the various levels. This same translucent material is used to the sides of the loading bay.

The colour for the external walls has been selected by the Concept Architect, CCA, which has been used by them on similar industrial projects in Switzerland. An example is shown below.

The roof is made up of similar insulated sandwich panels and overlaid by a dark grey steel profiled roof sheeting. To the perimeter an edge guarding is provided.

Internally the structural floors are insitu concrete with an epoxy paint finish to the process areas and a sealant to the warehouse areas. Internal walls are prefinished steel insulated panel walls set on raised plinths.

Precedent images - CCA Architects - Nestle Switzerland



6 Planning Considerations

6.1 Planning Considerations

Principle of Development & Design

This section appraises the submitted planning application against national and local planning policy documents, principally the NPPF (December 2024) and the Wiltshire Core Strategy (2015)

Principle of Development

The site is not allocated for development within the adopted or emerging Wiltshire local plan. However the site consists of previously developed land and existing employment/light industrial operations are protected by Policy CP35 (Existing Employment Sites) of the adopted Wiltshire Core Strategy. Policy CP35 confirms that such sites should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these areas will be supported.

At a national level, paragraph 85 of the National Planning Policy Framework (NPPF 2024) explains that 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, taking into account both local business needs and wider opportunities for development.

Policies CP 1 and CP 2 of the Wiltshire Core Strategy set out the underlying principles of the delivery strategy; to ensure that communities have a better balance of jobs, services, facilities and homes. Policy CP1 of the WCS sets out a four-tier hierarchy of settlements to identify where sustainable development can take place, with the settlement of Trowbridge identified as a Principal Settlement; a strategically important centre and primary focus for development, providing significant levels of jobs and homes.

The existing factory buildings on the application site are well established, having been on the site since pre-1970s. The proposed development seeks to construct 2,400sqm of new factory space to facilitate CUK's planned expansion. The proposal, involving the regeneration and intensification of an existing site within a defined Principal Employment Area is fully supported by Policy CP 35.

CUK are a longstanding employer within Wiltshire; the expansion of the premises will secure

its long-term future and commitment in Trowbridge. The proposed development will maintain an employment use on the site and will therefore comply with Policy CP 35. In addition to this, alongside the company's predicted future growth, there is an expectation of additional employment opportunities over time, in compliance with policy CP 1.

Policy CP 35 includes various criteria which must be satisfied for redevelopment of existing employment sites. The Policy largely seeks to retain sites within Principal Employment Areas for employment uses. As the proposal will retain, regenerate and intensify and existing employment site the policy requirements are not relevant.

Policy CP 36 of the Wiltshire Core Strategy supports economic regeneration opportunities on brownfield sites and aims to maximise the re-use of previously developed land. Section 11 of the NPPF also seeks to ensure proposals for economic growth are supported. It identifies that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

The proposed development is fully in accordance with Policies CP 35 and CP 36, helping to deliver the following economic benefits;

- Creation of approximately 50 new jobs
- Additional employment opportunities created during the construction period
- Investment and redevelopment of part vacant site located within an existing employment area.

The proposed development would also represent effective use of previously developed land in full accordance with the principles set out in Section 11 of the NPPF and the adopted policies of the Wiltshire Local Plan.

Design

Core Policy 57 seeks to ensure that a high standard of design is required in all new developments. As such, in redeveloping this site the proposal responds positively to the existing townscape and landscape features in terms of building layout, built form, height, massing, scale, elevation design, materials and streetscape to effectively integrate buildings into the immediate industrial/employment area setting. It also has due regard to more rural setting to the north and the residential areas to the south and west.

The site is an existing industrial site consisting of a number of factory buildings and associated infrastructure. The new factory building will be located at the north eastern corner of the site, away from nearby residential dwellings and public vantage points. It has been designed to be functional, with an external appearance to match that of the existing context.

In that regard, the proposed new factory building represents efficient use of land whilst responding positively to the characteristics of the site and local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area. The proposals are therefore consistent with the aims and objectives of Policy CP 57.

6.2 Planning Considerations

Technical Impact Assessments

Landscape and Visual

A Landscape Strategy and a Landscape and Visual Appraisal (LVA) prepared by Goodger Design Associates accompanies this submission in order that the visual impacts of the proposed development can be fully understood.

The LVA has highlighted the exposure of the proposed building from public rights of way and other receptors in the north and immediate south and east of the factory site. The report concludes that due to existing rolling countryside, landforms, and wooded nature of the River Avon valley along with the new strategic planting will allow the proposed building development to sit comfortably within the existing landscape.

The accompanying landscape plans (Nos. 480/02 & 480/03) 480/02 and 480/03 illustrate the proposed landscape strategy that will aid the in the integration of the proposed new manufacturing building into the local landscape typology of the River Avon Valley.

The new building will be partially visible in the current context although the existing railway embankment and woodland reduces the visual impact of the existing buildings. In mitigation, the supporting landscape strategy proposes two semi mature English Oak and a semi mature Hornbeam tree along this eastern boundary together with a mixed native hedgerow of fast growing whips and feathered trees including Field Maple, Hornbeam, Wild Cherry, and Hawthorn with evergreen species such as Holly and Privet. This planting will strengthen the existing woodland boundary along the site's eastern perimeter when the new building is constructed.

Boundary habitats will be retained, protected and enhanced, with features such as areas of grassland, shrubs and trees included to assist with screening the development. Accordingly, the proposal is in accordance with CS Core Policy 51

Trees

The application is submitted with an Aboricultural Implications Assessment and Method Statement prepared by Acer Trees. New trees are planted as part of the proposal in accordance with CS Core Policy 51 of the adopted Wiltshire Core Strategy, which encourages the conserving and enhancing of landscapes.

It is proposed to enhance the existing tree belt at the north of the site with UK native trees to support native fauna and to improve the screening provided by the existing trees. No trees are proposed for removal as part of the proposed development and root protection areas of retained trees will be protected before demolition and construction on site to prevent any damage to retained trees.

It is concluded within the Arboricultural Implications Assessment that there will be no significant negative effects and therefore in accordance with CS Core Policy 51.

Ecology and Biodiversity Net Gain

Policy CP 50 of the adopted local plan confirms that development proposals must demonstrate how they protect features of nature conservation. Accordingly, a Preliminary Ecological Appraisal (PEA) prepared by SLR Consulting accompanies this application for full planning permission.

The Site is not within a statutory designated site. MAGIC records confirm that there are two international statutory designated sites within 10km of the Site, and three national statutory designated sites within 5km. The site does lie within the buffer zone for the Bath and Bradford on Avon Special Area of Conservation, designated for conservation of rare bat species.

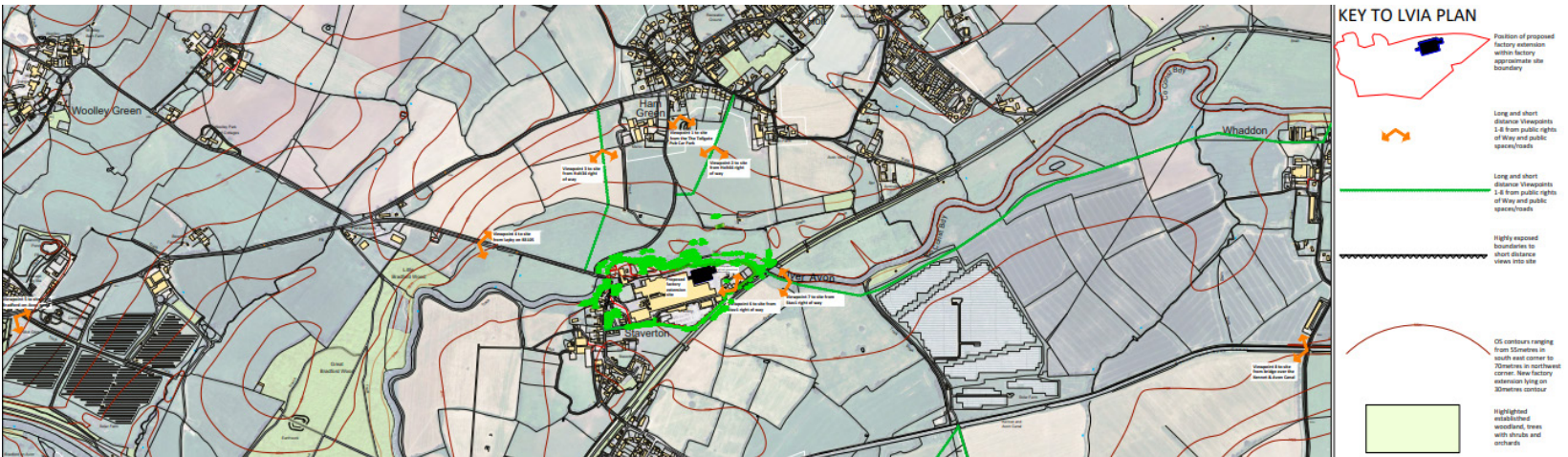
The supporting PEA is informed by a desk study and a field survey undertaken in August 2025. The Site was found to comprise other neutral grassland, woodland and intersected by hardstanding. Based on the protected species scoping survey and UKHab survey undertaken it is considered that no major constraints are present which would preclude the Site's development. The report confirms that no protected species surveys are required to inform the planning application.

Policy CP 50 seeks biodiversity enhancements particularly through major development proposals. Given that the proposed development will not generate the loss of more than 25sqm of habitat, the mandatory 10% net gain in biodiversity does not apply to the proposed development. Nonetheless, the accompanying landscape strategy prepared by Goodger Design Associates confirms that new trees will be planted and additional wildflower planting is proposed to enhance existing green areas of the site.

The proposed development is therefore in full accordance with Policy CP 50 of the adopted Wiltshire Core Strategy.



Selected viewpoints taken from supporting LVIA



Viewpoint locations as assessed within supporting LVIA



Selected viewpoints taken from supporting LVIA



6.3 Planning Context

Technical Impact Assessments

Highways and Access

Policy CP 62 of the of the Wiltshire Core Strategy confirms that new developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. In order that the impact of the proposed development upon the local highway network can be fully understood, a Transport Statement prepared by SLR Consulting is submitted in support of this application.

The expansion to the site is expected to employ approximately 50 additional members of staff and results in approximately 21 additional deliveries through the weighbridge access daily. The aim of the new structure is to return the levels of production on site back to historical levels seen in 2020.

The proposed development has been tracked with a 16.5m HGVs in order to demonstrate that the development proposals are able to be serviced without issue. In addition, existing servicing arrangements to other parts of the factory would not be detrimentally affected by the proposed extension.

With the proposed development, the average daily deliveries are 106 trips with 12 in the typical network AM peak (08:00-09:00) and 3 two-way trips in the typical PM peak (17:00-18:00). Compared with the existing servicing trip generation of the site, this represents a daily increase of around 42 deliveries across the day with 5 additional deliveries in the AM peak and one additional delivery in the PM peak, which is not considered to be significant.

The site is expected to generate seven additional two-way staff trips in the AM peak and 14 additional two-way staff trips in the PM peak. This is equivalent to one new trip every nine minutes in the AM peak and one new trips every four minutes in the PM peak which is also not considered to be significant.

The existing number of car parking spaces provided within the staff car park is sufficient to

accommodate the additional traffic associated with the proposed development. The maximum predicted car parking accumulation in the staff car park would occur at 10:00-11:00, with 100 spaces occupied. This is within the existing provision of 154 spaces on site.

The proposals are therefore considered acceptable in the context of Policies CP 60, CP 61 & CP 62. Given the site is in a sustainable location and their overall impact in terms of paragraph 116 of NPPF is not severe.

Heritage

The site is not located within a conservation area and there are no listed buildings on the site. However the following listed buildings are located within a 200 yard radius of the application site;

- Weselyan Chapel – Grade II
- The Old Bear Inn – Grade II
- Gates, gate piers and overthrow at Churchyard of Church of St Paul – Grade II
- Church of St Paul – Grade II
- Road Bridge – Grade II

Policy CP58 (Ensuring the conservation of the historic environment) requires that “designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance.” A Heritage Statement prepared by Stride Treglown is submitted in support of this planning application, concluding that; given the separation distance and the extent of intervening built form which consists of factory buildings and the public highway, it is considered that the proposed development would generate a low level of ‘less than substantial’ harm, negligible in degree, to the significance of these Grade II listed heritage assets.

Paragraph 215 of the NPPF requires the level of harm to be weighed against the public benefits of the proposal. In this case the level of harm is ‘low level of less than substantial harm’. It is considered the following public benefits outweigh the low level of harm:

- Retention of employment and creation of additional employment opportunities during construction and operational period.
- Development of previously developed land in an established industrial site
- Significant investment into Staverton, Holt and Trowbridge

Air Quality

In accordance with CS Core Policy 55 (Air quality) the proposal will not exacerbate an existing area of poor air quality. An Air Quality Assessment prepared by SLR Consulting accompanies the planning application. The Assessment considers the air quality during the construction and operational phases and concludes that the predicted impacts will not be significant and therefore satisfies Policy CP 55.

Flood Risk

The accompanying Flood Risk Assessment prepared by Edenvale Young confirms that the site is located in Flood Zone 2 (medium flood risk) and partly in Flood Zone 3 (high flood risk). However, the Long Term Flood Risk Rivers and sea Map shows the Site outside the area at risk of flooding in the current day, and maintains a low chance of flooding with climate change allowance.

To mitigate the risk of flooding, the proposed factory finished floor levels have been raised 300mm above the existing as a precautionary measure. The new factory building will be located on part of the existing impermeable service yard, which drains freely into the Weston Cut.

This site specific Flood Risk Assessment shows that the site will be safe for its lifetime without increasing flood risk elsewhere, and in fact providing betterment upon the existing conditions.

The Sequential Test

The requirement for a Sequential Test is established within Section 14 of the NPPF entitled, “Meeting the challenge of climate change, flooding and coastal change”

Paragraph 173 states that a sequential risk-based approach should be taken to individual applications in areas known to be at risk now or in future from any form of flooding. Paragraphs 174 to 176 provide further guidance in respect of the sequential test.

National Planning Practice Guidance Para 027 further confirms that, “in applying the sequential test a proportionate approach should be taken. Where a site specific Flood Risk Assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for he lifetime of the development (therefore addressing risks identified e.g. by Environment Agency Flood Risk Map for Planning), without increasing flood risk elsewhere, then the sequential test need not be applied”.

The proposed development consists of a new factory building which is classified as a ‘less vulnerable’ use with respect to flood risk. As previously developed land, the application site is considered to sit within Flood Zone 3a where sequential and exception tests need not be applied. Notwithstanding this, the site has been chosen because of its suitability within the wider site in terms of sustainable and efficient operations.

	<i>Essential infrastructure</i>	<i>Water Compatible</i>	<i>Highly Vulnerable</i>	<i>More Vulnerable</i>	<i>Less Vulnerable</i>
<i>Flood Zone 1</i>	✓	✓	✓	✓	✓
<i>Flood Zone 2</i>	✓	✓	Exception test required	✓	✓
<i>Flood Zone 3a</i>	Exception test required	✓	✗	Exception test required	✓
<i>Flood Zone 3b</i>	Exception test required	✓	✗	✗	✗

Table 1 - Flood risk vulnerability and flood zone compatibility

Drainage Strategy

In accordance with Wiltshire Council’s Betterment Guidance, the runoff from the factory will be attenuated to 30% below the pre-development runoff rate, for all events up to the 1 in 100 year event with climate change allowance. The system will be relatively shallow and will operate by gravity. However, when the system is tide-locked, the tank will be over-pumped at the controlled rate. The tank area and depth is limited and prevents a larger attenuated volume.

In light of the above and the supporting Flood Risk Assessment, the proposed development is compliant with the provisions of the NPPF and Policy CP67 of the Wiltshire Core Strategy.

Noise

A Noise Impact Assessment prepared by SLR Consulting in accordance with British Standard BS4142 accompanies this planning application to demonstrate that the proposed development can meet the requirements of Policy CP57 (Ensuring High Quality Design and Place-Making).

A baseline survey was undertaken between the 20th and 24th of November at the three identified receptors. The report concludes that the anticipated noise levels generated by the new factory building would have a low impact at all of the noise sensitive receptors during the day-time and night-time.

Notwithstanding these conclusions, the predicted rating levels are above the limit of 5dB below the background set by Wiltshire Council level at NSR02 during the nighttime and for NSR03 during the daytime and the night-time. However, the background levels and predicted rating levels at the identified noise sensitive receptors remain low in the context of background noise creep in areas where there is a significantly amount of noise from industry and where background levels are already relatively high.

With this in mind, the proposed development is considered to accord fully with Policy CP57.

Ground Conditions

A Phase II Ground Investigations Report prepared by Terra Firma is submitted with the application concludes that the test results identify the on-site soils have not been found to contain elevated concentrations of inorganic contaminants. There is therefore considered to be no significant risk to human health, the development or the wider environment and therefore in accordance with CS Core Policy 56 (Contamination)

7 Conclusion

7.1 Concluding remarks

This Planning, Design & Access Statement has been prepared by Stride Treglown on behalf of the applicant, CPUK in support of a full planning application for the construction of a new 2,400sqm factory building on vacant land within their existing food manufacturing site in Staverton, Trowbridge.

CPUK is proud to have been operating in Trowbridge since the middle of the 20th Century and wants Trowbridge to remain its regional base for producing ready-to-eat breakfast cereals including Shreddies and Shredded Wheat. CPUK has grown over the last 25 years and to be able to meet demand and to continue to grow, further expansion is required.

The principle of the development of the site for a new factory building is fully supported by both the adopted development plan and the NPPF. The site is an existing, primarily vacant industrial site located in an established employment area and is ideally suited for the expansion of the manufacturing facility. There are no material considerations that run against the presumption that the application, as sustainable development, should be supported. Indeed, it is a real and significant material consideration in favour of the application that the positive economic impact of the development will be considerable. By expanding the existing food manufacturing site, CPUK is investing in its future in Staverton. The proposal will generate new employment opportunities and will secure future employment in Trowbridge and the surrounding area.

In accordance with Policy CP 36 of the local plan, the proposed development supports economic regeneration through the effective re-use of previously developed land.

The scheme has been tested for its environmental impacts and will not result in adverse impact upon the character of the surrounding area. It is a scheme worthy of the planning authority's support and in accordance with Section 38(6) of the 2004 Act, should be approved.

FILE	
ST_REPORT_A3_Landscape_231108	
PROJECT	
Whitehorse Factory Building	
CLIENT	
CPW	
STRIDE TREGLOWN JOB No.	
157027	
PREPARED BY	CHECKED BY
LW	EF
DATE	REVISION No.
26.11.2025	PL1

REVISION	
1	PL1 - First Issue
2	X
3	X
4	X
5	X
6	X

STRIDE TREGLOWN

Edward Flood

+44 (0)117 974 3271
EdwardFlood@stridetreglown.com

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