



Proposed Development at Kemble Enterprise Park, Wiltshire

Planning Statement (inc. Heritage) – Storage Area

Project Reference:

Prepared for: Kemble Business Enterprise Park Ltd.

December 2025

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1 Introduction

- 1.1 This Planning Statement has been prepared by Q+A Planning Ltd ('Q+A') to support a retrospective planning application in respect of land at Kemble Enterprise Park, Kemble, Cirencester GL7 6FD, for the retention of a plant and machinery storage area associated with Sunbelt Rentals and their existing operation.
- 1.2 The purpose of this Statement is to provide details of the application proposals, describe the site and its surroundings, review the planning policy framework, identify key benefits of the application scheme, and draw conclusions as to the acceptability of the details of for the proposed development.
- 1.3 The table below sets out the plans and drawings that have been prepared by Corstorphine and Wright architects, which have been submitted in support of the application alongside this Statement.

1.1 Submission Drawings

Plans	Plan Reference	Rev
Location Plan	KEM-CWA-00-ZZ-D-A-0001	P01
Site Plan	KEM-CWA-00-ZZ-D-A-0002	P01
Hardstanding Fence and Gate Specifications	KEM-CWA-00-ZZ-D-A-0003	P01

Structure of the Planning Statement

- 1.4 The remainder of the Planning Statement is structured as follows:
- Section 2 describes the location and characteristics of the application site, surrounding area and planning history;
 - Section 3 provides details of the proposed development, the general design principles and concepts which have been applied and the key benefits of the application scheme;
 - Section 4 sets out the planning policy context, having regard to the National Planning Policy Framework (NPPF), the development plan and other material considerations;
 - Section 5 assesses the compatibility of the scheme with the requirements of the NPPF and relevant development planning policy and demonstrates that the proposed development accords with those policies; and
 - Section 6 provides the overall summary and conclusions.

2 Site Description and Planning History

- 2.1 The application site extends to approximately 6,175 sqm and forms part of the Kemble Enterprise Park, which covers an area of some 52 hectares to the west of Kemble in Wiltshire. The Park occupies land that was previously the southern part of the former RAF Kemble airfield. The remainder of the wider site falls under the separate ownership of Cotswold Airport.
- 2.2 The site lies approximately 3.5km to the southwest of the village of Kemble. The nearest towns are Cirencester, approximately 6km northeast of the site and Tetbury approximately 7km to the southwest.

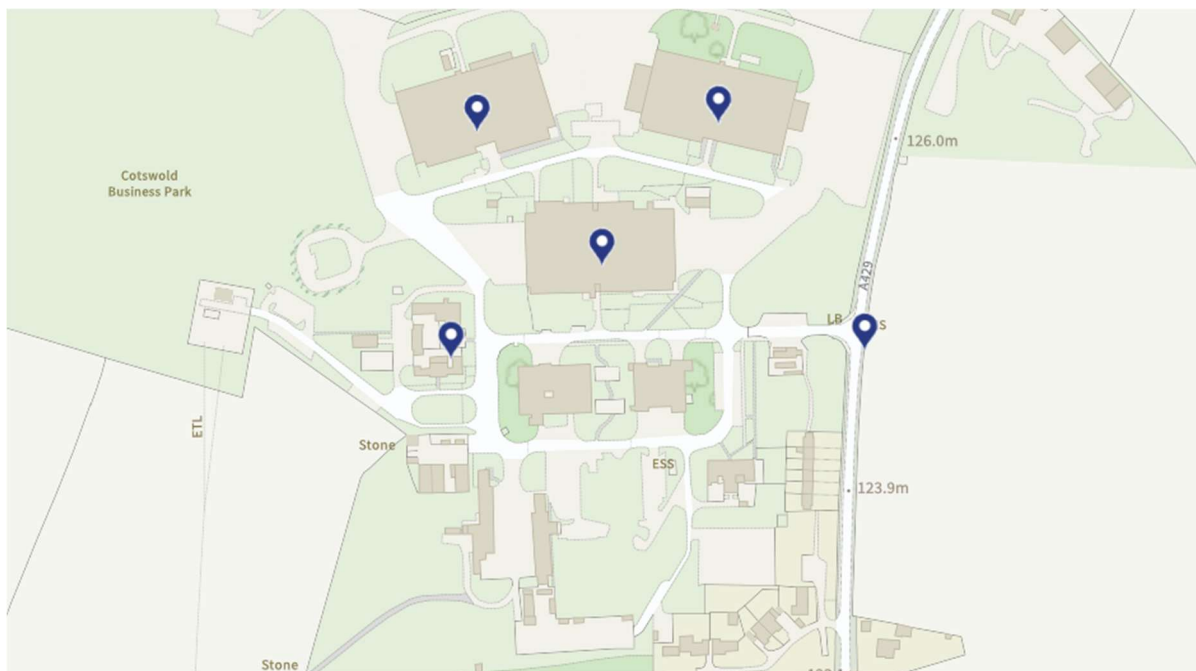
Figure 2.1 Site Location



- 2.3 The Enterprise Park comprises a variety of buildings, the majority of which date from the land's former use as an airfield. These include aircraft hangers, administration blocks and workshops, which provide a range of different types of business space. Over time, these have been adapted where possible to suit the requirements of new businesses.

- 2.4 Eight of the buildings within the wider site are Grade II statutory Listed Buildings. Seven of these are former aircraft hangers and have been listed in recognition of their architectural and historic interest and group value. Four listed buildings, including three hangars, are located circa 115m to the north and northwest of the application site at the nearest point. There is also a Grade II listed milestone on the A429 immediately opposite the main entrance to the Enterprise Park.

Figure 2.2 Listed Buildings



Planning History

- 2.5 The use of Kemble Enterprise Park for business purposes has been established since the 1990s, when the site was declared surplus to Ministry of Defence (MoD) requirements.
- 2.6 The principal uses of the existing hangers and buildings are primarily a mix of Class B8 and Class E(g) (formerly B1) uses, with some sui generis occupiers and a Class D1 day nursery. Given the mix of uses, the wider site has an extensive planning history. Applications that are of particular relevance to the current proposals are listed below.

2.1 Planning History

Reference	Proposal	Status
16/00320/FUL	New B8 (Storage & Distribution) and B1 (Office) Space Including Provision of New Vehicular Access and Associated Parking and Landscaping Works (Resubmission of 14/08417/FUL)	Approved November 2016

14/08417/FUL	Hybrid application for new B8 (storage and distribution) and B1 (office) space, including provision of a new vehicular access. Matters relating to the provision of new warehouse and ancillary office space (building 4) of 20210sq.m. and new vehicular access are in detail. Matters relating to the provision of a gatehouse building (B1) of 651sq.m. and 2 office buildings (B1) of up to 1355sq.m. (buildings 2 & 3) to be considered in outline with matters of appearance, scale and landscaping to be reserved for future consideration.	Withdrawn April 2015
N/13/01593/FUL	Hybrid Application (Full and Outline) For Employment Development Class B1 and B8 Uses (Resubmission of Planning Application 11/01531/FUL).	Refused June 2013
N/11/01531/FUL	Hybrid Application (Full and Outline) For Employment Development Class B1 and B8 Uses	Refused July 2011

3 The Development

- 3.1 The current application seeks retrospective planning permission for the retention of a plant and machinery storage area immediately to the east of Victory House and Sunbelt Rentals' existing premises.

Figure 3.1 Photo of the site looking towards Victory House



- 3.2 The site was previously occupied by three buildings and associated paved areas. All of the structures within the application boundary were demolished circa 20 years ago and the remaining areas of hardstanding have been used for plant and machinery storage since.
- 3.3 The surface of the site comprises hardstanding from previous buildings and structures, infilled with hardcore to create a uniform surface, where necessary. The development is surrounded by a combination of a galvanised steel palisade fence and a 2.4m high dark green weldmesh fence with a powder coat finish.

4 Planning Policy Context

- 4.1 This section describes the relevant adopted local planning policies as well as national planning policy and other material considerations which the decision taker should have regard to.
- 4.2 Section 38(6) of The Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that planning applications must accord with the provisions of the adopted Development Plan unless material considerations indicate otherwise. This Planning Statement, therefore, considers the application proposals in light of the relevant planning policy context and any other relevant material considerations.
- 4.3 For the purposes of determining the application, the development plan comprises the Wiltshire Core Strategy, saved policies from district local plans, the Chippenham Site Allocations Plan, the Wiltshire Housing Site Allocations Plan, Minerals and Waste Plans and made Neighbourhood Plans.
- 4.4 Other planning policies and guidance that are material considerations in the determination of this application are:
- The National Planning Policy Framework; and
 - National Planning Practice Guidance.
- 4.5 Wiltshire Council is currently preparing a new Local Plan. A Regulation 19 version of the new local plan was subject to an independent examination by the Planning Inspectorate between 11th and 13th November 2025; however this was subsequently suspended for several reasons, including the strategic approach to housing and employment.
- 4.6 Paragraph 49 of the NPPF states that weight may be given to relevant policies in emerging plans subject to three considerations: namely (in summary) how advanced the preparation of the plan is; the extent of unresolved objections; and the degree of consistency with the NPPF.
- 4.7 Progress on the adoption of the new Local Plan is at a relatively early stage and therefore in accordance with the NPPF, its policies can only be afforded limited weight.

Wiltshire Core Strategy (2015)

- 4.8 The Wiltshire Core Strategy Development Plan Document (DPD) was adopted in January 2015 and covers the whole of Wiltshire, excluding Swindon. It sets out the council's spatial vision, key objectives and overall principles for development in the county.
- 4.9 The Core Strategy also identifies a number of strategic objectives to deliver the vision for Wiltshire. The following are of relevance:
- Strategic objective 1: Delivering a thriving economy

- Strategic objective 6: Ensuring that adequate infrastructure is in place to support our communities

- 4.10 The policies contained within the Core Strategy, that are relevant to the application proposal are identified below:
- 4.11 **Core Policy 1: Settlement Strategy** sets out the hierarchy of settlements. Development is to be focused in the Principal Settlements, Market Towns and Local Service Centres, with only limited development anticipated in the villages.
- 4.12 **Core Policy 2: Delivery Strategy** identifies the development requirements in Wiltshire over the plan period, including 178ha of land for employment, including a number of ‘strategically important’ employment sites. Although Kemble Enterprise Park is not specifically listed, its status as an existing employment area is recognised within the supporting text for Core Policy 13.
- 4.13 The Core Strategy divides Wiltshire into twenty ‘Community Areas’, to respond to the differing requirements of each. The application site lies within the Malmesbury Community Area. **Core Policy 13: Spatial Strategy for the Malmesbury Community Area** sets out the new development requirements for Malmesbury, including 4ha of land allocated for employment purposes, which are carried forward from the previous Local Plan. It lists three ‘Principal Employment Areas’ within the Community Area (Malmesbury Business Park, Dyson Site and North of Tetbury Hill). Although not listed, paragraph 5.71 of the Core Strategy recognises that the former RAF Kemble has since developed into Kemble Business Park.
- 4.14 The Core Strategy also acknowledges that if Wiltshire does not have the land available in the right locations at the right time to meet business needs, this could result in the county losing businesses to other locations where a more favourable environment exists. **Core Policy 34: Additional Employment Land** therefore supports the delivery of opportunities for the provision of employment land that may come forward in the Principal Settlements, Market Towns and Local Service Centres.
- 4.15 **Core Policy 37: Military Establishments** seeks to guide the redevelopment of the significant number of operational and redundant MoD sites in Wiltshire. It states that the redevelopment, conversion or change of use of redundant MoD sites and buildings that are remote from settlements will be supported where the existing buildings and infrastructure on the site are suitable for redevelopment, conversion or change of use. It also seeks to ensure that the overall character of former MoD sites is enhanced and that the “cultural and historical” significance of the facilities on the site are understood and inform the scope of future development of the site.
- 4.16 **Core Policy 50: Biodiversity and Geodiversity** requires development proposals to demonstrate how they protect features of nature conservation and geological value. Where this is not possible, mitigation must be undertaken to secure appropriate compensatory measures.

- 4.17 **Core Policy 51: Landscape** expects development proposals to be informed by the distinctive landscape character in which they sit, with proposals protecting, conserving, and where possible, enhancing landscape character. Any negative impacts must be mitigated as far as possible through sensitive design and landscape measures.
- 4.18 **Core Policy 57: Ensuring High Quality Design and Place Shaping** requires a high standard of design for all new development. These includes being sympathetic to and conserving historic buildings and historic landscapes and making efficient use of land whilst taking account of the characteristics of the site and the wider character of the area.
- 4.19 **Core Policy 58: Ensuring the Conservation of the Historic Environment** requires development to protect, conserve and where possible enhance the historic environment. It states that designated heritage assets and their settings will be conserved and where appropriate enhanced in a manner appropriate to their significance, including buildings and structures of special architectural or historic interest.
- 4.20 **Core Policy 67: Flood Risk** requires all new development to include measures to reduce rainwater run-off rates and improve rainwater infiltration, unless site or environmental conditions make this unsuitable.

National Planning Policy Framework

- 4.21 The NPPF (2024) is a key material consideration in all planning decisions and sets out the overarching policy priorities for the planning system against which local plans will be prepared and decisions made on planning applications.
- 4.22 The document states at paragraph 7 that the purpose of the planning system is to contribute to the achievement of sustainable development. Further, at paragraph 11 it notes that plans and decisions should apply a presumption in favour of sustainable development which for decision-taking means:
- approving development proposals that accord with an up-to-date development plan without delay; and
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 4.23 National planning policy set out in the NPPF advises that there is a presumption in favour of sustainable development and that development in accordance with the development plan should be granted without delay, unless material considerations indicate otherwise (paragraph 11).
- 4.24 In terms of decision-making, the document advises at paragraph 39 that local planning authorities should approach decisions on proposed development in a positive, creative way. They should work with applicants to secure developments that will improve the economic, social and environmental conditions of the area and in particular approving applications for sustainable development where possible.
- 4.25 Paragraph 85 advises that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. National policy advances 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.
- 4.26 Paragraph 87 states that planning decisions should recognise and address the specific locational requirements of different sectors.
- 4.27 Paragraph 202 requires the conservation of heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 4.28 Paragraph 210 states that in determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.29 Paragraph 212 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

5 Planning Assessment

5.1 Taking into account the national and development plan policy context outlined in Section 4 of this Statement, the following key issues relevant to the determination of the application are as follows:

- Principle of Development
- Impact on the Character, Appearance and Amenity of the locality
- Impact on Heritage Assets
- Ecology
- Drainage

Principle of Development

- 5.2 This application seeks retrospective planning permission for the storage of plant and machinery at Kemble Enterprise Park. If granted, the layout, appearance and use of the site would remain as existing.
- 5.3 Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. This is in turn reflected by Core Policy 2 of the Core Strategy, which seeks to support sustainable development specifically within Principal Settlements, Market Towns, Local Service Centres and Large Villages.
- 5.4 Whilst Kemble Enterprise Park falls outside of settlements in an area classed as 'open countryside', it is an established business park within a clear curtilage and complex of buildings. Similarly, although is not specifically listed as one of Wiltshire's 'strategically important' employment sites or the Malmesbury Community Area's 'Principal Employment Areas', it is recognised as an existing employment area within the supporting text for Core Policy 13.
- 5.5 Core Policy 34 allows for B1 (now Class E(g)) and B8 development outside settlement boundaries where it is considered, inter alia, essential to wider strategic interests of the economic development of Wiltshire and subject to demonstrating that it is required to benefit local economic and social needs.
- 5.6 The development will support the growth and development of an existing business that employs predominantly from the local area, which is of benefit to local economic and social needs. Being a predominantly flat area used for plant and machinery storage, the development is not of a scale that would adversely impact upon nearby residents or neighboring uses. This is also consistent with Core Policy 37, which allows for the redevelopment or re-use of redundant MoD facilities for employment-led developments that do not exceed existing footprints.
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- 5.7 Similarly, given that the development occupies less than 0.62 ha of a 52-hectare site, the proposal is not of a scale that would undermine the delivery of strategic employment allocations at Principal Settlements such as Chippenham and would not exceed the capacity of existing infrastructure at the site.
- 5.8 On balance, the development is consistent with Core Policies 2, 13, 34 and 37 of the Core Strategy and the relevant chapters of the NPPF and therefore acceptable in principle.

Character, Appearance and Amenity

- 5.9 The development is of a modest scale, providing 6,175 sqm of storage surrounded by a 2.4m high weldmesh fence. The storage area is positioned adjacent to Sunbelt Rentals existing premises to the west and a further fenced storage compound to the south. It therefore reflects the scale, form and character of neighbouring development, in line with the requirement of Core Policies 34, 37 and 57.
- 5.10 In terms of residential amenity, given the degree of separation between the development and the nearest residential properties, and the presence of intervening vegetation, it is not considered that there will be any harm to existing residential amenity through noise, overbearing impact, loss of privacy or overlooking. Furthermore, the use of the storage area will be subject to the same hours of operation as the existing business and the remainder of the Enterprise Park, which significantly limits the potential for unacceptable amenity impacts.

Heritage

- 5.11 The wider site is one of the earliest examples of this type of early RAF facility and representative of the expansion plan of the RAF in the mid-1930s following the first world war and in the build up to the second world war.
- 5.12 RAF Kemble was established as an Aircraft Storage Unit in the late-1930's and accommodates several examples of hangers from the beginning of the Second World War. As a result, following a thematic listing survey by English Heritage most of the hangers on the site from that period were listed, alongside the base's water tower.
- 5.13 There are four Listed Buildings located to the north of the site. The closest of these is the Grade II listed Building 6 (Works Services Building and Water Tower), which is located circa 115m to the northeast.

Assessment of Significance

- 5.14 Paragraph 208 of the NPPF requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 5.15 The significance of a heritage asset may comprise a number of factors, which are similar to the criteria for listing and include:
- Age and rarity: most buildings built before 1700 which survive in anything like their original condition are listed, as are most built between 1700 and 1840
 - Architectural interest: through architectural design, decoration and craftsmanship and also important examples of particular building types and techniques
 - Historic interest: encompassing buildings which illustrate important aspects of the nation's social, economic, cultural or military history, or close historical association with nationally important people or events
 - Group value: especially where buildings are part of an important architectural or historic group or are a fine example of planning (such as squares, terraces and model villages)
- 5.16 Taking the above into consideration, the relative significance of the elements of the site can be assessed using the following scale:
- High significance – buildings/features which make an important contribution to the architectural and historic interest and character of the site, through age, rarity, architectural merit or historical association or group value, and whose preservation and enhancement is considered essential
 - Medium significance – those making a lesser contribution, but which nevertheless are also considered worthy of preservation or enhancement
 - Low significance – those making only a limited contribution to the site overall, although not necessarily detracting from it.

Assets of High Significance

- 5.17 As a Grade II listed buildings, the three hangars and Building 6 located to the north of the site can be considered assets of high significance and are therefore of considerable importance.

Assets of Medium Significance

- 5.18 There are no assets of medium significance in their own right, although elements of the site are of lesser importance than others. For example, later additions and alterations to buildings are of lesser importance. For example, although the roads and paths are of limited value being functional infrastructure, it could be argued that the context within which they sit (i.e. within the setting of a number of listed buildings) is worthy of preservation or enhancement and as such is of medium significance.

Assets of Low Significance

- 5.19 There are no assets of medium or low significance in their own right although elements of the site are of lesser importance than others. For example, as neighbouring buildings has been subject to extensive (albeit sympathetic) renovations, such elements are of lesser importance than others.

Impact Assessment

- 5.20 Whilst the wider site is significant in terms of its wartime and related aviation history of this part of Wiltshire, the structures themselves are not considered to be of significant architectural merit or of significant age. Rather, it is their importance in representing the history of wartime and aviation development and facilities in this part of Wiltshire that is of significance.
- 5.21 The wider site has clearly been subject to alteration over the relatively limited timeframe of its history, and a clearly functional approach was taken in terms of site layout and use. This has subsequently been reflected in the use of parts of the former airfield for business and employment purposes, including the application site.
- 5.22 The development is of a scale that reflects both the existing and previous uses of the wider site and retains its existing layout. The development is also located some distance from the principal areas of the site and the main designated heritage assets, with a number of intervening structures of varying ages.
- 5.23 The impact upon the closest listed buildings will be no more than negligible. The proposed works will not undermine the basic character of these buildings but will be a significant improve the functionality of the site as an efficient business park. The proposed materials have been chosen to be in-keeping with their surroundings so as to be consistent in terms of the appearance of nearby heritage assets, as well as the wider area. As such, the proposals are consistent with Core Policy 58 of the Core Strategy and the relevant sections of the NPPF.

Ecology

- 5.24 Biodiversity Net Gain (BNG) is a statutory obligation that aims to leave the natural environment in a measurably better state than beforehand by protecting and enhancing important existing habitats and ensuring that environmental features which are lost or degraded are adequately compensated for.
- 5.25 Mandatory BNG commenced under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) for major development on the 12th of February 2024 and for 'small site' development on the 2nd of April 2024. As a result, all development must now demonstrate at least a 10% increase in biodiversity value, subject to a number of exceptions. At the time of writing, BNG does not yet apply to retrospective planning permissions made under section 73A.
- 5.26 Notwithstanding, all works have been undertaken entirely within existing areas of built development and hardstanding, and all existing landscape planting will be retained in its entirety. As such, the development will not impact upon any existing on-site habitats and complies with Core Policy 50 of the Core Strategy.

Drainage

- 5.27 The surface of the storage area comprises hardstanding from previous buildings and structures, infilled with hardcore to create a uniform surface, where necessary. The development will not introduce any new impermeable surfaces and will not in turn increase the risk of flooding on site or elsewhere.
- 5.28 As such, the proposal is consistent with Core Policy 67 and the relevant sections of the NPPF.

6 Conclusion

- 6.1 The development will result in the regularisation of the use currently taking place at the site. Being part of an existing industrial estate and located immediately adjacent to a number of other E(g) (formerly B1) and B8 uses, the storage of plant and machinery is a use of a type and scale that would not harm the character of the surrounding area. Furthermore, the development will not result in any unacceptable impacts in terms of residential amenity, biodiversity or flood risk.
- 6.2 Accordingly, the development satisfies the relevant planning criteria and planning permission should therefore be granted.

Appendices:

Appendix 1 – Site Photos*



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