

Application No: 12/2631M

Location: LAND AT ROYAL LONDON HOUSE, ALDERLEY ROAD, WILMSLOW, CHESHIRE, SK9 1PF

Proposal: Use of land as a temporary car park

Applicant: Royal London Group

Expiry Date: 27-Aug-2012

Date Report Prepared: 15.11.2012

SUMMARY RECOMMENDATION	APPROVE, SUBJECT TO CONDITIONS
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MAIN ISSUES

- Green Belt policy and ‘very special circumstances’
- Design
- Impact on residential amenity
- Arboricultural and nature conservation issues

REASON FOR REPORT

The proposed has been referred to the Northern Planning Committee at the discretion of the Head of Planning & Policy due to the sensitive nature of the application.

DESCRIPTION OF SITE AND CONTEXT

The Royal London House site is a major developed site in the Green Belt and comprises numerous buildings and car parking areas. The temporary car park the subject of this proposal lies within a field to the north west of the developed site and is accessed from the main complex. The car park accommodates approximately 100 spaces and is finished in gravel. The site is relatively well screened by existing mature vegetation, with more open aspects to the east towards the railway line

Royal London Wilmslow first occupied the site in 1987 with an anticipated staffing level of 700 staff. Since then the site has grown; Royal London (RL) currently have 850 employees on site and there are currently approx. 200 people on site in the tenanted offices.

A separate application has been made for temporary flood-lighting on the site (12/4016M) (the flood-lights are already in-situ and have been for sometime).

DETAILS OF PROPOSAL

The application seeks full planning permission for use of land as a temporary car park (the temporary use being for a 7 year period). The car park exists at present following temporary consent granted in 2009 (09/0571M), that consent itself followed previous consents (see history, below)..

RELEVANT HISTORY

- 97/1417P Temporary car parking for 104 cars. Approved with conditions 21.08.1997
- 98/1532P Retention of temporary car park for further 2 year period. Approved with conditions 16.09.1998
- 00/1738P Renewal of 97/1417P for temporary car park. Approved with conditions 13.09.2000
- 02/2043P Renewal of 00/1738P for a temporary car park. Approved with conditions 04.12.2002
- 04/1066P Use of land for temporary car park. Approved with conditions 08.07.2004
- 09/0571M Use of land for temporary car park. Approved with conditions, 1
3.05.2009

POLICIES

Macclesfield Borough Local Plan – saved policies

DC1 Design
DC3 Amenity

North West of England Plan Regional Spatial Strategy to 2021

DP1 (Spatial Principles)
DP2 (Promote Sustainable Communities)
DP5 (Manage Travel Demand; Reduce the Need to Travel, and Increase Accessibility)
DP7 (Promote Environmental Quality)
RDF4 (Green Belts)
RT2 (Managing Travel Demand)

National Planning Policy Guidance

National Planning Policy Framework

CONSULTATIONS

Highways:

No objections. The Highways Travel Plan Coordinator has stated the following:

I have reviewed the final travel plan for Royal London...I am satisfied that this plan meets all requirements, and I have confidence that Royal London are committed to this plan.

Heritage & Design – Nature Conservation:

No objections – No significant ecological issues associated with the application

Heritage & Design – Forestry:

No objections – No impact upon existing trees as a consequence of the application.

Environmental Health:

It is noted that the Environmental Health Officer was contacted to enquire if the Council has received any complaints regarding either the car park or the flood-lights. No complaints appear to have been received regarding either.

VIEWS OF THE PARISH / TOWN COUNCIL

Wilmslow Town Council:

Object and recommend the Council do not allow a 7 year extension to the temp car park. Recognise the importance of Royal London as a major employer in Wilmslow. Would welcome discussions regarding the way forward.

Wilmslow Trust:

Object to the application for the following reasons:

- Original permission lapsed; RL not adhered to conditions and have continued to use the car park without permission
- Impact on Green Belt
- Appears to represent an increase in capacity (fourfold) based on current usage with an increase in surfacing and lighting
- Granting a period of 7 years could lead to RL claiming ‘customary usage’ in the future

OTHER REPRESENTATIONS

36 No. representations have been received from individual members of the public and representation has been received from a Solicitor acting on behalf of “*clients who live in the vicinity of the site*”. Details can be read on file, but a summary of the issues raised is provided below:

- The area should have been returned to agricultural use in May 2010; current use is in breach of permission
- Allowing a temp 7 year period will pre-empt the democratic process re future land use around Wilmslow

- Concerned that temp permission will eventually become permanent permission
- Green Belt land should be protected
- Area of temp car park is more than is required for current needs
- The period requested (7 years) is unreasonably wrong
- There is no justification for use of Green Belt for such purposes
- Contrary to Green Belt policy/legislation; no exceptional circumstances
- Concerned it could lead to further encroachment into the Green Belt
- RL need to make proper, long-term arrangements on site for parking
- Green Belt land being swallowed up by business
- Ample space within RL site to accommodate limited additional parking (eg. multi storey/underground car park)
- Not sustainable development (in context of the NPPF); delays finding sustainable alternatives
- Creeping urbanisation
- Concern that RL will eventually want to build houses on the plot
- Potential adverse impact on local parking is a “red herring” as parking restrictions have now been put in place in the surrounding area
- Alternative modes of transport need exploring
- Loss of view
- Loss of grazing land
- No evidence to support the company’s stated aim of implementing “green travel plan”
- Alternatives to the temp car park have not been fully explored
- The car park can be seen from nearby housing
- RL have had plenty of opportunity to implement the travel policy; RL has not met its obligations under the previous temporary consent, what is going to be different with this application?
- ‘Inappropriate development’ in the Green belt. Economic sustainability doesn’t constitute ‘very special circumstances’. No justification why 7 years required. Many RL employees do arrive by public transport. Working hours at RL are flexible, thereby reducing the number of car parking spaces needed. Alternatives not fully investigated. Displacement to surrounding residential streets does not now happen as restrictions have been put in place.

APPLICANT'S SUPPORTING INFORMATION

The applicant has submitted the following supporting information, some of which was submitted during the course of the application in response to concerns raised by local residents and a request from the Officer:

- *Planning Supporting Statement*
- *Statement of Community Involvement*
- *Petition (pre application)*
- *Design & Access Statement*
- *Travel Plan (dated August 2012)*
- *Letter (dated 17/10/12) and accompanying Plan referring to alternative car parking options on site; Inspection Report (structural survey) of Two-Storey car park on site.*
- *Plans of Car Parks on site*

- *Info re Technical Note in respect of the Travel Plan*

Details of each of the documents can be read on file. However, key aspects from some of the documents will be extracted to summarise the proposed case below.

Travel Plan

- RL has occupied the premises since 1987, initially to accommodate 700 employees.
- The company has since grown through a process of acquisitions, resulting in sharp and immediate increases in staff levels, followed by stability and sometimes contraction.
- There are currently 850 RL employees on site; the number of RL staff on site has ranged from 700 to 1000 over the years.
- It is expected that the company will continue to grow (through additional acquisitions) with an associated need to accommodate staff members at Wilmslow. In this context RL wish to retain flexibility in use of what is referred to as the 'overspill car park', to ensure sufficient parking provision on site and avoid displacement to surrounding streets (which has happened in the past). This will enable RL to deal with step changes in staff numbers.
- RL is committed to a process of travel planning to manage demand for parking. Having first prepared a Travel Plan in 2008 the current Travel Plan demonstrates RLs commitment to manage parking demand through a shift to more sustainable modes of transport.
- The company has additional premises within the Wilmslow site which are leased to tenant companies.
- In total there are 742 parking spaces at the Wilmslow site, 156 of which are allocated to tenant companies. Hence, 586 spaces are available to RL staff. 10 of these spaces are reserved for visitors and 14 spaces for on-site contractors, leaving 562 spaces. 172 of these spaces are 'buddy spaces' (i.e. one vehicle parks behind/blocks in another vehicle) and 36 spaces are reserved for 'green commuters'.
- Of the 850 RL staff on the Wilmslow site all are allocated a parking permit. Hence, over-allocation of parking permits for the 562 spaces is 151%.
- In recent years RL has introduced a range of incentives to encourage sustainable travel, eg. car sharing (inc. cash incentives), bus shelter, access to information promoting alternative modes of travel, on-site cash point, internet café to allow internet shopping, refurbishment of shower & changing facilities, bicycle shelter, improved video and audio conferencing to reduce business travel, home working, prize draws (for 'green commuters' only), discount on local bus services, bike to work days, interest free season ticket loans, discounts at local outdoor clothing shops for regular walkers and cyclists.
- Despite all the above, existing travel behaviour and associated demand for car parking present a threat to the continued operation of the Wilmslow site. The existing Travel Plan has been prepared to challenge existing staff behaviour and support more sustainable travel choices. It is intended that implementation of the Travel Plan will reduce overall demand for parking at the Wilmslow site, so that use of the temporary parking area will no longer be required beyond the 7 years for which planning consent is sought.

- The Travel Plan (TP) includes information related to staff travel patterns, car parking provision & demand, TP objectives & targets, TP measures and initiatives to encourage car sharing/public transport use/cycling and reduce the need to travel, TP coordination, monitoring and review and the TP implementation plan.
- Surveys conducted on site (Jan-Mar 2012) regarding usage of the parking spaces illustrated a peak occupancy level of 595 spaces, of which 534 were RL staff, which equates to 95% of the available 562 spaces being used.
- The 534 figure equates to 63% of the 850 RL staff.
- However, in Jan 2011 a staff travel survey suggested that 765% of staff were single occupancy car users (an the staff numbers in Jan 2011 was around 730). Hence, it was concluded that business travel, staff absences and shift patters all impact on the number of vehicles on site.
- It is asserted that, with just 5% reserve capacity, the over-provision of parking permits and the extent of staff using the car as the preferred mode of transport, there is scope for the peak car park usage to increase leading to capacity issues.
- As noted, given that negotiations are currently on-going regarding future acquisitions, it is possible that RL staff numbers on site will experience a step increase again. In anticipation of this, RL wish to retain the flexibility to manage parking demand and avoid the possibility of capacity problems and displacement into the streets in the surrounding area. Hence, the application for the temporary car park.
- That said, RL are committed to a process of travel planning to manage demand for parking. The new Travel Plan demonstrates RLs commitment to this through encouraging a shift to more sustainable modes of transport.
- Table 5.1 in the Travel Plan shows the targets for a 3 year period (reduction in car driver usage, increase in car sharing/cycling/walking/use of public transport). The figures in this table suggest a reduction in RL staff car users of 51 over 3 years. The rate of change after this is expected to be slower. Hence, RL consider the period of 7 years is realistically what will be required to achieve the desired changes such that the temporary car park will no longer be required.

Technical Note

- It is commonplace for a Travel Plan to have reduced impact after initial implementation.
- Targets were agreed with Council's Travel Plan coordinator.
- Longer term reductions in car use occur on a gradual basis, as opposed to more significant step-changes that occur in the initial stages of Travel Plan implementation (a view that concurs with the consultant's experience of Travel Plans [Atkins] and assumptions made within national studies).
- The Travel Plan will be monitored on an annual basis; any opportunities to maintain reductions in car use will be identified and targeted through revised Travel Plan measures. A 1% annual reduction in car use beyond the third year is considered to be reasonable.
- The *Technical Note* does not seek to retro-fit Travel Plan targets to match the stated ambition of closing the temporary car park after 7 years. The targets set would not reduce the demand for parking by 100 vehicles over a 3 year period. With diminishing gains over time the 7 year period for which consent is sought is considered to be a reasonable period of time within which to impact on the travel patterns of RL staff at the Wilmslow site and remove the need for continued use of the temporary car park.

Alternative car parking locations on site

- RL are mindful that a number of objectors have raised the question regarding whether or not it would be possible for additional car parking to be accommodated within the existing RL site. Information is provided to address this issue. Three alternatives have been considered, referred to as Areas 1, 2 and 3.
- Area 1 – extension to existing decked car park. This car park has been examined by structural engineers in the past who concluded that *“The existing structure does not readily lend itself to the construction of a vertical extension and such a scheme would be a difficult undertaking.”* RL are of the view that an additional tier would be visually intrusive.
- Area 2 – land to the front of the existing buildings. The area sits in a prominent *“front of house”* location; the siting of a car park here is considered to be detrimental to RLs business activities. Also considered to be a significant intervention in the landform which would be harmful to the setting and character of the area. In addition a number of significant mature trees would be affected.
- Area 3 – land to the rear of the Royal London offices. This area can only be accessed by either passing close to a Grade II Listed Building or via the existing Emergency Vehicle Access, which is not suitable in its current form for regular vehicular access. Alterations to the access would involve radical earthworks to the banked land and loss of a large number of trees and planting. It is considered this would affect the setting and character of a heritage asset.
- Thus, RL considers that all 3 options are inappropriate and unsuitable for the reasons outlined.

OFFICER APPRAISAL

Principle of Development

In principle, the proposed is contrary to National Planning Policy/Guidance in respect of Green Belt policy as outlined in the NPPF. The proposed constitutes inappropriate development in the Green Belt and therefore very special circumstances have to be demonstrated to overcome the harm caused by inappropriateness (and any other identified harm).

Design

The physical layout, materials used and access to the site have all been deemed to be acceptable from a design point of view in previously approved applications. There are no justifiable reasons to reach a different decision about design within this application.

Impact on residential amenity

As the nearest residential properties are over 70m away from the site it is considered that there are no residential amenity issues arising from the application.

Arboricultural and nature conservation issues

As noted above, no issues arising from the application.

Green Belt and very special circumstances

NPPF

Since determination of the last application (09/0571M) the significant policy/guidance change that has come into effect is the National Planning Policy Framework (NPPF). Key extracts from the NPPF which have a significant bearing on the appraisal and determination of the application will be provided below:

The purpose of planning is to help achieve sustainable development.

There are three dimensions to sustainable development: economic, social and environmental...The economic role is about...contributing to building a strong, responsive and competitive economy...The environmental role is about...contributing to protecting and enhancing our natural, built and historic environment...These roles should not be undertaken in isolation...

Pursuing sustainable development includes (amongst other things)...making it easier for jobs to be created in cities, towns and villages...

A set of core land use planning principles underpin plan-making and decision-taking, which include (amongst many other things)...protecting the Green Belts...and actively managing...patterns of growth to make the fullest possible use of public transport, walking and cycling...

Delivering sustainable development involves building a strong, competitive economy. The Government is committed to securing economic growth in order to create jobs and prosperity...ensuring that the planning system does everything it can to support economic growth...significant weight should be placed on the need to support economic growth...

Transport policies have an important role to play in facilitating sustainable development...The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel...Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion... A key tool in achieving a move towards increasing sustainable transport modes is a Travel Plan.

The Government attaches great importance to Green Belts...New buildings and other forms of development that do not preserve openness or conflict with the purposes of including land within the Green Belt constitute inappropriate development in the Green Belt...inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances...very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Green Belt Assessment

The process to go through to assess impact on the Green Belt is as follows:

1. Is the proposal appropriate or inappropriate development? If it is concluded to be inappropriate then it will cause substantial harm.
2. As well as the harm caused due to inappropriateness, is there any additional harm (eg. impact on openness, impact on visual amenity, any threat to the purposes of including land within the Green Belt)?
3. What are the considerations in favour of the proposal?
4. Do those considerations clearly outweigh the identified harm to the Green Belt?
5. If the answer is yes to the last question, then very special circumstances may be considered to exist.

Officer appraisal of the case presented

It is considered that appraisal of this application comprises consideration of 3 key policy areas identified in the NPPF: 1) protecting the Green Belt; 2) supporting economic growth and 3) promoting sustainable transport modes.

It is accepted by all concerned that the proposed temporary car park constitutes inappropriate development in the Green Belt - a material change of use of the land which does not maintain openness. It is also considered that the car park has a degree of impact on visual amenity (though limited) and constitutes encroachment into the Green Belt. Hence, the proposed would be contrary to Green Belt policy as outlined in the NPPF. Consequently, very special circumstances need to be presented that outweigh the harm identified.

It is considered that Royal London is committed to its Travel Plan and is seeking to assist employees to reduce car usage and increase use of other modes of sustainable transport (it was noted above that CE Travel Plan Coordinator has confidence that RL are committed to the Travel Plan). With increased experience of Travel Planning in recent years RL consider the 7 year period for which consent is sought is considered to be a reasonable period of time within which to impact on the travel patterns of RL staff at the Wilmslow site and remove the need for continued use of the temporary car park. The aim of increasing sustainable modes of transport is consistent with NPPF policy of promoting sustainable modes of transport and reducing greenhouse gas emissions.

It is noted that RL have not pursued the concept of additional permanent car parking within the site and remain instead committed to the temporary option with the aim of returning the area of land back to grazing land. Although RL has submitted some information regarding alternative areas within the site that may be used for parking (concluding that, for one reason or another, the various areas are not suitable), it is considered by the Officer that the assessment of such alternatives has not been sufficiently robust to be able to conclude that such alternatives are definitely not suitable or feasible.

It is acknowledged by the Council that RL are a major employer within the Wilmslow area and indeed the Borough of Cheshire East; as such it makes a significant economic contribution to the area. It is also acknowledged that the continued economic well-being of the company is likely to involve further growth through, for example, further acquisitions. Consequently, the number of employees on site is likely to fluctuate. Using the planning system to achieve growth is a core theme of the NPPF.

The array of figures presented in the Travel Plan indicates the complexity of the tasks of analysis and target setting related to travel modes. However, the key figures referred to suggest that the existing permanent car parking capacity on site is not sufficient to accommodate the existing potential, and highly likely increased, demands for car parking on site. As such, a solution is required to the problem in order to a) prevent the possibility of displacement and b) support the company's desire for growth.

It is acknowledged that some parking restrictions have been introduced in some streets within the vicinity of the site. It is considered that the problem of displacement of vehicles from the RL site into neighbouring residential areas does not appear to have been a significant problem in recent times. However, it is also considered that displacement could be an issue if step changes in staffing levels occur at the RL site and the demand for car parking spaces on site cannot be met.

The applicant asserts that very special circumstances exist that outweigh the harm to the Green Belt identified. Thus:

The economic benefits to the Borough through the provision of employment on site are significant...and are considered to amount to very special circumstances.

The continued economic well being of Royal London is integral to the community and economy of Wilmslow.

It is also noted that the economic benefits have been accepted as amounting to very special circumstances when the Council have determined previous applications.

In weighing up the competing issues of protecting the Green Belt, supporting economic growth and promoting sustainable modes of transport, it is considered that Royal London, through the comprehensive Travel Plan, are committed to achieving a reduction in car usage and an increase in sustainable modes of transport. It is also considered that the operational needs of the company require the flexibility of having a temporary car park in order to achieve growth. It is considered that as the application is for a temporary period the long term impact on the Green Belt is protected. Hence, on balance, it is considered that the case presented does constitute very special circumstances that outweigh the harm caused to the Green Belt by inappropriateness and the other harm identified.

That said, the 7 year period of temporary consent that has been applied for is considered to be too long. The figures presented in the Travel Plan (re reduction in car usage over the coming years and increase in other modes of sustainable transport) are based on the current RL employee figures. The key aspect of the very special circumstances presented is to allow the company to grow and increase the number of employees located at the Wilmslow site. Assuming this then will happen, the Travel Plan will have to be revised (following annual review) to accommodate the change in number of employees. Hence, it is not guaranteed that at the end of the 7 year period the company will have achieved the changes required to be able to manage demand for car parking on the Wilmslow site without the temporary car park. Therefore it is recommended that consent be granted for a temporary period of 3 years, at the end of which RL and the LPA will have to conclude if a temporary solution is going to work or if a permanent solution will need to be found.

CONCLUSIONS AND REASON(S) FOR THE DECISION

The proposal constitutes inappropriate development in the Green Belt. However the specific circumstances regarding the short-term use of the car park and the interests of economic sustainability, promotion of sustainable modes of transport and long term protection of the Green Belt are considered to amount to very special circumstances that would outweigh the harm to the Green Belt by virtue of inappropriateness, visual impact and encroachment in this instance. As such, a temporary consent of 3 years is recommended for approval subject to conditions.

RECOMMENDATION: Approve subject to following conditions

1. Temporary use

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