RBWM Planning Application number 22/03270

I write in objection to the above mentioned application as…

It appears the application is in Outline, with all matters reserved except **access** however ‘access’ is directly related to the proposed new use which is predominantly a distribution centre with tall buildings to facilitate HGV loading and unloading docking bays, as opposed to the existing office use.  Therefore, consideration of ‘access’ in terms of quantum and type of traffic movements is directly related to the proposed new use and in turn directly related to scale of the proposed buildings (to facilitate the HGVs). The proposed new use and proposed extent (floor area, height and volume) of development is a key consideration when concluding whether ‘access’ should be deemed appropriate or not. The roundabout on the A4 was built to deal with office park traffic, mainly cars. HGVs are a very different proposition. Some are more than 60ft long and on that roundabout they could nearly block 2 entry or exit points with just one lorry as the A4 at that point is single carriageway. Modern day logistics are trending towards using HGVs with trailers thereby requiring fewer drivers, vehicles and resulting in energy savings. The roundabout at the north end of Westacott way is unsuitable for this type of vehicle. As the proposed site is more than double the size of the office park it is likely that there would be a very large number of HGVs and articulated lorries using this route.

A Traffic Statement has been submitted alongside the application which appears to be lacking in sufficient detail to make a considered decision. The traffic incidents recorded in the past 5 years on the Bath Road/ Westacott Way roundabout are considered by the applicant to ‘not represent a significant highway safety issue’ which appears to a be a strange suggestion. The proposed material change in the type of density of traffic through the introduction of a significant number of HGV movements on these areas of the highway which are subject to known incidents already, is likely to result in more serious incidents, due to the size of the vehicles.

As a local resident of White Waltham Airfield, the development that is proposed on the Maidenhead Office Park that requires a number of large two storey buildings well in excess of the existing building heights would infringe the transitional surfaces set out in the Airfield’s Civil Aviation Authority Safeguarding Plan for runways 07/25 and 11/29.

The prescribed transitional surfaces are calculated for safety reasons.  They take into consideration the effect of wind on aircraft departing and landing as well as emergency procedures including engine failure and aborted movements. Contravention of these transitional surfaces could compromise the ability of the airfield to retain its CAA licence due to non-compliance with the required statutory regulations. There is also an additional risk at night of the lights on the site of this massive development, proving a distraction to aircraft while landing and taking off. A safeguarding map is lodged with the Council for this purpose.

The Airfield is both an historic and economically beneficial asset to the Borough, as recognised and protected in the Waltham’s Neighbourhood Plan adopted by RBWM, and therefore any development around the Airfield that jeopardises its safe operation must not be approved.

I object to the **scale** of this proposed development. The existing office buildings are already large buildings which benefit from screening by trees provided by the airfield which were put in as a temporary solution when the existing offices were built.  Large and taller buildings would be detrimental to both visual and spatial openness of the Greenbelt.  The footprint of this proposal is more than 100% larger than the existing. The heights of the buildings will also appear to be double as they are being built on the spoil created by the demolition of the existing site. The result will be buildings of up to 21m above the level of the airfield.  This will have a huge effect on the “openness” of this area in the Greenbelt.  Should the trees be removed or pruned which will happen in due course, the impact will be even greater.  The drawings submitted by the developer does **not** show that the proposed buildings will be **higher** than the trees and will stick out above them. Suggested replacement screening by the developers will take more than 30 years to grow to screen these huge buildings. If indigenous trees are planted, it will take even longer. This directly contravenes Greenbelt policy. White Waltham airfield is designated as an area of special character and as such should be protected when considering development applications. These proposed buildings should not be materially higher than either the existing buildings or others in the area. The existing buildings are already significantly taller than the original wartime hangars that they replaced. The Airfield tries hard to retain the historic features and visual aspects that characterise WW11 airfields.

The newly Adopted RBWM Local Plan 2022 Planning Policy QP5 states with reference to the Greenbelt:

‘**The Metropolitan Green Belt, as per the Policies Map, will be protected against inappropriate development. Planning permission will not be granted for inappropriate development (as defined by the NPPF), unless very special circumstances are demonstrated**.’

The above Policy refers the decision maker to the National Planning Policy Framework (NPPF) wherein Greenbelt Policy only allows for replacement building/s ***‘provided the new building is in the same use and not materially larger than the one it replaces’.*** Materially larger is generally considered to be no more than 25%/30% increase in the floor area, volume and height of the existing building.

With regard to the submitted documents for Maidenhead Office Park the existing buildings consist of 27,692 sq.m. of B1 Office floorspace whereas the proposed replacement buildings would extend to 61,000 sq.m (more than 100% increase). The corresponding volume will be more than 200% larger. The change of use requires an increase in the height of the new buildings. Clearly, the proposal massively exceeds a 25% increase and hence the proposal **IS** materially larger and therefore does not conform with either Local or National Planning Policy.

Further, the use of the existing building/s is as B1 Offices whereas the proposal is for use of the new buildings for Egiii research and Development, B8 storage and distribution and B2 General Industrial – As such the ‘new building will not be in the same use as the one it replaces’ and therefore fails, again, to comply with either Local or National Planning Policy.

As such the proposal is, even in principle, inappropriate development in the Green Belt wherein, no very special circumstances have been put forward, that could justify the proposal and hence the application must be refused.

Regards