

Your Ref: 42/11/00017

Our Ref: 332310075/4503

03 February 2022

Planning Department
Sedgemoor District Council
Bridgwater House
King Square
Bridgwater
Somerset
TA6 3AR

For the Attention of Stuart Houlet

Dear Stuart

RE: S73 APPLICATION TO VARY CONDITIONS 2 (APPROVED PLANS), 4 (CTMP), 5 (SOFT LANDSCAPING WORKS), 7 (ECOLOGICAL MITIGATION AND MANAGEMENT PLAN), 9 (SCHEME FOR MODIFICATIONS TO ANY DITCH, DRAIN OR WATERCOURSE) AND 13 (TREE ROOT PROTECTION FENCING) OF EXTANT PERMISSION 42/11/00017 ON LAND AT FORMER ROYAL ORDNANCE FACTORY, WOOLAVINGTON ROAD, PURITON, BRIDGWATER TA7 8AD ('GRAVITY')

Background and Context

On behalf of our client, This is Gravity Ltd ('the Applicant'), we write to submit an application to vary Conditions 2, 4, 5, 7, 8, 9 and 13 of extant planning permission 42/11/00017 relating to land at former Royal Ordnance Factory (BAE Systems), Woolavington Road, Puriton, Bridgwater.

The site is now known as 'Gravity'. It is an agreed Enterprise Zone (EZ) within the Heart of the South West Local Enterprise Partnership (LEP) area, following allocation in the Core Strategy, and is an integral part of Bridgwater Vision and the Sedgemoor Economic Development Strategy. A Planning Performance Agreement (PPA) is in place between Gravity and the Council, and a Memorandum of Understanding was agreed to deliver the EZ with MHCLG, the Heart of the South West LEP and the County Council, under the main permission 42/13/00010.

The Applicant has an ambitious approach to sustainability and seeks to create a low carbon environment at Gravity, aligned to the delivery of the UK Industrial Strategy and the Local Industrial Strategy, specifically in relation to Clean Growth, AI, Data and the Future of Mobility. This has been communicated to the Council and the wider business community at Sedgemoor business conferences and through specific member and officer briefings, via the Gravity web site, significant engagement relating to the Gravity LDO, and the community newsletter.

As Gravity has progressed towards realisation, it has become clear that some of the supplementary consents which support the main consent need amending, as site requirements change to suit the needs of the market. The emerging markets which Gravity will provide a base for have modern requirements which outdate the provisions of previous decisions, such as the subject permission 42/11/00017. 42/11/0017 (the remediation consent) was granted in June 2012 for:

Caversham Bridge House
Waterman Place
Reading
Berkshire RG1 8DN

Telephone: +44 (0)118 950 0761
email: PBA.Reading@stantec.com

Registered Office:
Stantec UK Ltd
Buckingham Court
Kingsmead Business Park
Frederick Place, London Road
High Wycombe HP11 1JU
Registered in England No. 1188070

'Engineering works to facilitate the remediation including earthworks and the demolition of existing buildings.'

The permission covers a diverse range of engineering and environmental issues to solve the challenge of remediating the site, such that it is suitable for Gravity's ambitions. One of these solutions includes the creation of multiple 'development platforms', which offer large plots for future development. As mentioned previously, the spaces that the market require in the age of XXL advanced manufacturing facilities and onsite supply chain manufacturing / assembly, are everchanging. The most appropriate solution now, is to afford the most flexibility to future occupants of the Site such that Gravity can provide for all of their needs at once and enable high value employers and occupiers to invest within and create new high value opportunities for the region.

This can be achieved, in response to these modern market needs, by preparing the Site as a single 'development platform', or plateau. By doing so it will allow flexibility and create the environment to expedite that investment, realizing the benefits in the relative short term and delivering on the long-term ambitions of the locality without delay.

This application seeks to achieve this by varying conditions attached to the remediation consent such that the revised plans, including the new Illustrative Landscape Masterplan (Rev E) which prescribes the size and form of the singular plateau, can be amended. Other Conditions are proposed to be varied due to the technical implications of such a change, such as those on soft landscape works and watercourse management. We consider that the wording of these Conditions should be amended to require development to accord with the newly submitted plans. We provide suggested wording for each of the affected conditions throughout this letter.

In total, this application seeks to vary:

- Condition 2 (Schedule A) – Approved plans
- Condition 4 – Construction & Transport Management Plan
- Condition 5 – Soft landscaping works
- Condition 7 – Ecological Mitigation and Management Plan
- Condition 9 – Scheme for modifications to any ditch, drain or watercourse
- Condition 13 – Tree Root Protection Fencing

Scope of Submission – Variation of Conditions

Condition 4 – Construction & Transport Management Plan (CTMP)

"No Development shall commence until a Construction & Transport Management Plan (CTMP) has been submitted to and approved in writing by the Local Planning Authority. The Construction Method Statement should provide the following detail:

- *the parking of vehicles of site operatives and visitors;*
- *the loading and unloading of plant and materials;*
- *the storage of plant and materials*
- *wheel washing facilities*
- *road cleansing arrangements*
- *hours of work for each phase of development*

The Construction Method Statement shall be implemented as approved in accordance with the schedule set out within it and shall be carried out in its entirety, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard the amenities of local residents and occupiers and to ensure safety on the highway."

The following revised documentation is submitted in response to Condition 4 requirements:

- Condition 4 – Construction & Transport Management Plan (332310102/4503/002)

This report provides the details and processes for managing construction traffic in transporting plant, resources, material and labour to the Site. It demonstrates that a suitable arrangement is in place to mitigate against any impact's contingent on construction traffic, such as on highway safety or the amenity of local residents, broadly following the approach set out in the original CTMP which discharged Condition 4 in 2012 but amending to utilise the newly completed Gravity Link Road. Due to the completion of the Link Road, particularly the reuse of site material for construction of the Link Road bunding, the total imported material requirement for the preparation of a development platform has increased. This is reflected in the revised Construction & Transport Management Plan.

The recommended wording for the varied condition is therefore as follows:

"Development shall be implemented in accordance with the approved Construction & Transport Management Plan (332310102/4503/002 dated August 2021), unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard the amenities of local residents and occupiers and to ensure safety on the highway."

Condition 5 – Soft Landscaping Works

"Prior to the commencement of earthworks or remediation works, full details of soft landscape works shall be submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved within the first planting season following the completion of development, unless otherwise agreed by the Local Planning Authority. The trees/shrubs shall be protected and maintained, and dead or dying trees/shrubs shall be protected and maintained, and dead or dying trees/shrubs shall be replaced to the satisfaction of the local planning authority for a period of five years following their planting.

Reason: In the interests of landscape preservation."

The following revised documentation is submitted in response to Condition 5 requirements:

- Condition 5 – Illustrative Landscape Masterplan (11-07-14 Rev E)
- Condition 5 – Tree Planting & Matrices – Area 1 (11-07-221 Rev C)
- Condition 5 – Tree Planting & Matrices – Area 6 (11-07-226 Rev C)
- Condition 5 – Tree Planting & Matrices – Area 7 (11-07-227 Rev C)

The revised Illustrative Landscape Masterplan clearly depicts the requisite singular development plateau, retaining a comprehensive soft landscaping scheme throughout the Site's purlieu towards the boundary.

The revised Tree Planting plans demonstrate Gravity's continued commitment to soft landscaping works, presenting a comprehensive soft landscaping planting scheme which accounts for the new singular development plateau without losing any of the previously agreed planting numbers delivering a variety of environmental benefits.

The recommended wording for the varied condition is as follows:

“Development shall be implemented in accordance with the approved Illustrative Landscape Masterplan (11-07-14 Rev E) and Tree Planting & Matrices plans (11-07-221 Rev C, 11-07-222 Rev B, 11-07-223 Rev B, 11-07-224 Rev B, 11-07-225 Rev B, 11-07-226 Rev C, and 11-07-227 Rev C), unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of landscape preservation.”

Condition 7 – Ecological Mitigation and Management Plan

“Prior to the commencement of remedial works and earthworks, details shall be submitted to, and approved in writing by, the LPA in respect of the provision of an ecological mitigation and management plan as identified in the ecological reports. The Plan shall include the proposed mitigation for protected species within the site and the management of the retained habitats to ensure that biodiversity is maintained and enhanced within the Site. The remedial works and earthworks shall proceed in accordance with the approved details

Reason: In the interests of ecological mitigation and protection.”

The following revised documentation is submitted in response to Condition 7 requirements:

- Condition 7 – Ecological Mitigation Strategy and Management Plan (5106.EMSMP.vf3)

This EMSMP has been written with reference to published guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM) and in accordance with Natural England guidelines for protected species. It considers the ecological baseline and evaluation of important features within the site; sets out a mitigation strategy to avoid significant adverse impacts on features due to be retained within the Site; and makes management prescriptions in order to achieve specific objectives, including monitoring requirements.

The recommended wording for the varied condition is as follows:

“Development shall be implemented in accordance with the approved Ecological Mitigation Strategy and Management Plan (5106.EMSMP.vf3 dated August 2021), unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of ecological mitigation and protection.”

Condition 9 – Scheme for Modifications to any Ditch, Drain or Watercourse

“No earthworks or remedial works shall take place on any part of the site (or other such time or stage agreed in writing with the Local Planning Authority) until full details of any modifications to any ditch, drain or watercourse on site have been submitted to, and approved in writing by, the Local Planning Authority. The details shall include maintenance responsibilities for the rhyme system upon completion of the development. The development shall be implemented in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

Reason: To maintain an adequate drainage system and ensure that flood risk is not increased in accordance with the National Planning Policy Framework.”

The following documentation is submitted in response to Condition 9 requirements:

- Condition 9 – Surface Water Management Strategy (332310102/4002 Rev A)

This revised Surface Water Management Strategy describes the approach to managing surface water, particularly in relation to the management, use and maintenance of ditches, drains and watercourses. It is proposed to fully integrate 3.7 hectares of reed beds stretching north of the site into the surface water system for treatment and storage and all development drainage will eventually be directed through the reed beds and out to the Huntspill River via a new/modified outfall.

During the interim period, the existing outfall arrangements will be preserved as far as possible.

The recommended wording for the varied condition is as follows:

“All earthworks and remedial works shall be implemented in accordance with the approved Surface Water Management Strategy (332310102/4002 Rev A dated 19 January 2022), unless otherwise agreed in writing by the Local Planning Authority.”

Reason: To maintain an adequate drainage system and ensure that flood risk is not increased in accordance with the National Planning Policy Framework.”

Condition 13 – Tree Root Protection Fencing

“Prior to the commencement of earthworks or remediation works, details of protective fences to be erected around any existing trees shall be submitted to the Council and approved in writing. These fences shall not be removed, and the protected areas are to be kept clear of any building, plant, material, debris, and trenching, with the existing ground levels maintained, and there shall be no entry to those areas except for arboricultural or landscape works until the development is completed or otherwise approved by the Local Planning Authority.”

Reason: To safeguard the areas to be landscaped and the existing trees and planting to be retained within the Site.”

The following revised documentation is submitted in response to Condition 13 requirements:

- Condition 13 – Tree Root Protection Fencing Site Overview Sheet 1 11-07-21 Rev D
- Condition 13 – Tree Root Protection Fencing Sheet 2 11-07-22 Rev D
- Condition 13 – Tree Root Protection Fencing Sheet 3 11-07-23 Rev D
- Condition 13 – Tree Root Protection Fencing Sheet 4 11-07-24 Rev D
- Condition 13 – Tree Root Protection Fencing Sheet 5 11-07-25 Rev D

These revised Tree Root Protection Fencing Plans demonstrate the British Standard compliant protection measures to be guaranteed for the arboriculture which could potentially be subject to impacts associated with the development platform works. In addition to demarcating locations for Heras fencing both during and post works, the plans also articulate methodologies for compaction and the undertaking of works which could affect trees.

The recommended wording for the varied condition is as follows:

“All earthworks and remedial works shall be implemented in accordance with the approved Tree Root Protection Fencing plans (11-07-21 Rev D, 11-07-22 Rev D, 11-07-23 Rev D, 11-07-24 Rev D, and 11-07-25 Rev D), unless otherwise agreed in writing by the Local Planning Authority.”

Reason: To safeguard the areas to be landscaped and the existing trees and planting to be retained within the Site."

Condition 2 – Approved Plans

"The development hereby permitted shall be carried out in accordance with the approved plans listed in Schedule A

Reason: For the avoidance of doubt in the interests of proper planning."

The applicant does not intend to vary Condition 2 itself, rather, the schedule of approved plans (Schedule A). The approved plans / documents to be substituted with the revised plans submitted in this package are listed below with their replacement.

Approved Title	Approved Reference	Revised Title	Revised Reference
Construction & Transport Management Plan	B0045-08-R2-1	Construction & Transport Management Plan	332310102/4503/002
Illustrative Landscape Masterplan	11-07-14 Rev A	Illustrative Landscape Masterplan	11-07-14 Rev E
Tree Planting & Matrices – Area 1	(11-07-221 Rev B)	Tree Planting & Matrices – Area 1	11-07-221 Rev C
Tree Planting & Matrices – Area 6	(11-07-226 Rev B)	Tree Planting & Matrices – Area 6	11-07-226 Rev C
Tree Planting & Matrices – Area 7	(11-07-227 Rev B)	Tree Planting & Matrices – Area 7	11-07-227 Rev C
Ecological Mitigation Strategy and Management Plan	5106.EMSMP.vf2	Ecological Mitigation Strategy and Management Plan	5106.EMSMP.vf3
N/A	N/A	Surface Water Management Strategy	332310102/4002 Rev A
Tree Root Protection Fencing Site Overview Sheet 1	11-07-21 Rev A	Tree Root Protection Fencing Site Overview Sheet 1	11-07-21 Rev D
Tree Root Protection Fencing Sheet 2	11-07-22 Rev B	Tree Root Protection Fencing Sheet 2	11-07-22 Rev D
Tree Root Protection Fencing Sheet 3	11-07-23 Rev B	Tree Root Protection Fencing Sheet 3	11-07-23 Rev D
Tree Root Protection Fencing Sheet 4	11-07-24 Rev B	Tree Root Protection Fencing Sheet 4	11-07-24 Rev D
Tree Root Protection Fencing Sheet 5	11-07-25 Rev B	Tree Root Protection Fencing Sheet 5	11-07-25 Rev D

Summary

For the avoidance of doubt, all information submitted in support of this application is listed below:

Condition	Submitted
Condition 4 – CTMP	Construction & Transport Management Plan (332310102/4503/002)

Condition 5 – Soft Landscaping Works	<p>Illustrative Landscape Masterplan (11-07-14 Rev E)</p> <p>Tree Planting & Matrices – Area 1 (11-07-221 Rev C)</p> <p>Tree Planting & Matrices – Area 6 (11-07-226 Rev C)</p> <p>Tree Planting & Matrices – Area 7 (11-07-227 Rev C)</p>
Condition 7 – Ecological Mitigation and Management Plan	Ecological Mitigation Strategy and Management Plan (5106.EMSMP.vf3)
Condition 9 – Scheme for Modifications to any Ditch, Drain or Watercourse	Surface Water Management Strategy (332310102/4002 Rev A)
Condition 13 – Tree Root Protection Fencing	<p>Tree Root Protection Fencing Site Overview Sheet 1 (11-07-21 Rev D)</p> <p>Tree Root Protection Fencing Sheet 2 (11-07-22 Rev D)</p> <p>Tree Root Protection Fencing Sheet 3 (11-07-23 Rev D)</p> <p>Tree Root Protection Fencing Sheet 4 (11-07-24 Rev D)</p> <p>Tree Root Protection Fencing Sheet 5 (11-07-25 Rev D)</p>

We trust this provides both clarity and adequate detail to address the implications of proposed changes to the remediation consent in order to facilitate an appropriate development plateau at the site to respond to contemporary market demands at the site.

Should you wish to discuss anything further, please do not hesitate to contact myself (sam.harper@stantec.com / 01173 327929) or my colleague Elliot Dommett (elliot.dommett@stantec.com / 01823 218983).

Yours sincerely



Sam Harper
Senior Associate Planner
on behalf of Stantec UK Ltd

c.c. Claire Pearce, This is Gravity Ltd