

Addendum to Planning Justification Statement



Erection of Container Storage at Storage Room to the Rear of Eastwoods Service Station, Ashby Road, Stapleton, LE9 8JE

Prepared by Landmark Planning Ltd

August 2023

Following comments from the LPA, this addendum addresses each comment. Comments have been taken directly from the the email from the LPA dated 29th June, as follows.

LPA Comment

Hinckley & Bosworth Borough Council Environmental Health Department:

- '1. Please can the applicant provide the proposed operating hours of the site.
2. Please can the applicant provide details of the proposed lighting of the site - the site lighting should be compliant with the Institution of Lighting Professionals guidance document "The Reduction of Obtrusive Light".'

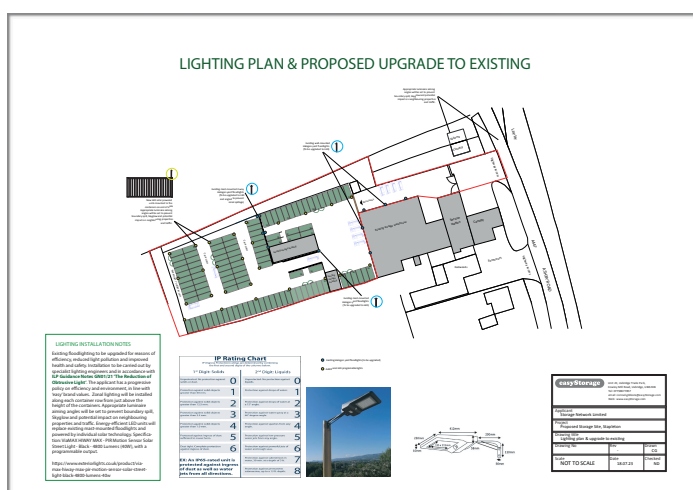
Applicant Response

The existing site operates 24/7, the applicant proposes no change.

The applicant shall replace the manually operated gate with 'silent' face recognition automated entry. Eastwood Service Station operates 6am to 11pm Monday to Saturday, and 7am to 9pm Sunday. Visits to the site outside these times are seldom made, usually due to urgent circumstances such as retrieval of a passport.

Existing floodlighting to the site shall be upgraded for reasons of efficiency, reduced light pollution and improved health and safety. Installation shall be carried out by specialist lighting engineers and in accordance with ILP Guidance Notes GN01/21 'The Reduction of Obtrusive Light'. The applicant has a progressive policy on efficiency and environment, in line with 'easy' brand values. Zonal lighting will be installed along each container row from just above the height of the containers. Appropriate luminaire aiming angles will be set to prevent boundary spill, Skyglow and potential impact on neighbouring properties and traffic. Energy-efficient LED units will replace existing masted floodlights and powered by individual solar technology. Specification: ViaMAX HIWAY MAX - PIR Motion Sensor Solar Street Light - Black - 4800 Lumens (40W) - see link for product <https://www.exteriorlights.co.uk/product/viamax-hiway-max-pir-motion-sensor-solar-street-light-black-4800-lumens-40w>

A lighting plan has also been provided:



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LPA Comment**Leicestershire County Council Highways Department:**

'1. The Applicant will need to demonstrate that the access is (or can be) designed in accordance with Part 3 of the LHDG, taking into account visibility, width and junction radii. In the event appropriate visibility splays cannot be provided in accordance with Part 3, Table DH4 of the LHDG, the Applicant would need to undertake an automatic speed survey (not handheld radar) at the site access in order to establish whether visibility could be provided to the recorded 85%ile speeds. The Applicant should be advised that a permit is required to carry out any traffic count/speed survey on the public highway within Leicestershire. A permit can be obtained by contacting ndi@leics.gov.uk. Alternatively, Leicestershire County Council offer a data collection service including a large traffic count database. For details of the services available please contact ndi@leics.gov.uk.

2. Based on LHDG guidance, parking requirements are based on the internal floorspace of the development and not the overall site measurements. The submitted application form also states that the existing gross internal floorspace is 185 square metres of B8 use class, not B2 and that this does not appear to be lost as part of the proposals. Parking provision for a development of this scale would be based on the Highway Requirements For Development Part 4 document available within the LHDG. Based on this guidance of one car parking space per 100 sq. metres and one lorry space per 400 sq. metres would be required, which results in considerably less parking demand than suggested by the Applicant. The LHA suggest that the Applicant gives further clarification in respect of the existing use and scale of the site, given the discrepancies between the application form and the Planning Statement.

3. While the LHA acknowledge self-storage units are less likely to generate the level of HGV trips a typical B8 proposal would and that customers may only visit once a month or less. The Applicant has based the existing level of trips and the proposed trip generation on the level of parking provision. The Applicant considers this approach is required for the existing and proposed land use within the site, rather than an evidence based methodology. The LHA request clarification as to the level of trips the existing site could generate throughout the day as well as the AM and PM peaks (e.g. 08:00 - 09:00 and 17:00 - 18:00), along with the types of vehicles undertaking the trips. Should the existing site be still operational, the most appropriate method of demonstrating this would be by an actual traffic survey of the site (not undertaken in school holidays) as opposed to a TRICS assessment. This should then be compared to the level of trips the proposed self-storage development could generate. The LHA notes that the Applicant has a number of self-storage sites throughout the country and this could therefore potentially be done by undertaking trip generation analysis based on actual data from an existing comparable site as opposed to using the TRICS database.

4. In the event the proposals result in approximately 30 additional two way trips over and above existing levels (e.g. 15 arrivals and 15 departures), the LHA would require a capacity assessment of the site access, as well as a trip distribution exercise.



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The above information would be required in order to move forward and progress the application.'

Applicant Response

It is confirmed that the forms should refer to existing floorspace as B2, not B8. To clarify, the existing site provides HGV parking for 15 to 20 HGVs at any one time. A mixture of short (up to 8 hours) to mid term (Up to 10 days) depending on logistics shift patterns. There also a number of Cars parked daily, staff circa 2-3, and visitors short-term visits. There is capacity to store more vehicles.

Traffic movements for the existing and proposed site have already been provided, with the proposal resulting in a reduction in movements, and a significant reduction in HGV movements. Proposed movements are based upon multiple sites of the same nature, operated by the applicant, as detailed in the provided traffic movement document (Hinckley Site visit data 20-7-23). Regardless of the demonstrated reduction in HGV movements, a HGV turning plan has been requested and provided, thus demonstrating the proposed site can provide sufficient turning space for HGV's. Regardless, the proposal does not anticipate HGV movements. Movements are expected to comprise cars and light good vehicles only.

No dedicated customer parking is shown on site as it would be expected that any visitors to the site would simply drive up to their self-storage container and park close or immediately outside their container, and there is ample room for them to do so within the proposed site layout, therefore no dedicated customer parking is required. 4 x employee parking is provided, as is at present.

With regards to visibility splays, a plan has been provided illustrating views of 155m south and 215m+ north. These splays account for any visual restriction from approved development near the highway. Following guidance from Highway Engineers, it is confirmed that based on the guidance contained in Manual for Streets 2, that the available visibility splays are suitable for vehicle speeds of at least 60mph, well in excess of the 50mph speed limit on Ashby Road. These splays should be considered to be more than suitable and certainly should mean that a speed survey is should not be required.

It is noted the requirements within the LHDG a trumped by those for MfS2, and the applicants Highway Engineer has won 2 appeals to support this case.

I trust the the above addresses any more detailed concerns, and wish to stress that the overarching point surrounding LHA concerns should be that movements will be reduced, and HGV movements are expected to be reduced to a near-negligible level, creating significant improvement to highway safety.

Principle of Development

'In addition to the above, following internal discussions of the proposal, it is considered that the principle of development is not supported by Policy DM4 of the adopted Site Allocations and Development Management Policies DPD 2016, with pertains to Safeguarding the Countryside and Settlement Separation. The polices seeks to protect the intrinsic value, beauty and open character and landscape character, of the countryside, and be safeguard from unsustainable development. The policy considers development in the countryside sustainable where:

- a) It is for outdoor sport or recreation purposes (including ancillary buildings) and it can be demonstrated that the proposed scheme cannot be provided within or adjacent to settlement boundaries; or*
- b) The proposal involves the change of use, re-use or extension of existing buildings which lead to the enhancement of the immediate setting; or*
- c) It significantly contributes to economic growth, job creation and/or diversification of rural businesses; or*
- d) It relates to the provision of stand-alone renewable energy developments in line with Policy DM2: Renewable Energy and Low Carbon Development; or*
- e) It relates to the provision of accommodation for a rural worker in line with Policy DM5 – Enabling Rural Worker Accommodation.*

And:

- i) It does not have a significant adverse effect on the intrinsic value, beauty, open character and landscape character of the countryside; and*
- ii) It does not undermine the physical and perceived separation and open character between settlements; and*
- iii) It does not create or exacerbate ribbon development;*
- iv) If within a Green Wedge, it protects its role and function in line with Core Strategy Policies 6 and 9; and*
- v) If within the National Forest, it contributes to the delivery of the National Forest Strategy in line with Core Strategy Policy 21.*

It is considered that the proposed development does not demonstrably and significantly contribute to economic growth or job creation, nor does it lead to the enhancement of the immediate setting. As such, the proposal is not viewed favourably and would likely be subject to a refusal of planning permission.'



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Applicant Response

Impact on Setting

Following an online meeting with the LPA, it has been established that the proposal can have the potential to improve the site. Alterations to the plans, and clarification of the initial proposal demonstrate that this potential is met, and the proposal will enhance the setting.

Research by the Container, Self-Storage and Trader's Association (CSTA) reveals that for many the perceived image of a self-storage site is poor design, rusty containers arranged randomly and less than friendly on site staff. easyStorage is transforming the way Self-Storage sites are designed, built and run and serviced. The Design and Access Statement sets out schemes for attractive planter's on site as well as adding indigenous shrubs around the perimeter. Not only does it make their sites a pleasant place to be, but it promotes biodiversity and provides a naturally enclosed space. Reclaimed timber cladding on end of row containers softens the industrial feel. Modern high- grade containers are sealed in natural green. LED lighting powered by mini solar panels light the way forward and minimises impact. All these touches not only enhance the existing harsh industrial, polluted and pot-holed site, they turn it in to an amenity asset for local businesses and individuals who will benefit from storage. Before and after shots may be seen in Fig 9 and 10, Section 5.10 of the Planning Statement. For a greater appreciation a video is available via this link: <https://www.youtube.com/watch?v=pzLJzqZLWBk>

A document titled 'Visual Enhancements' has also been submitted to clearly outline and draw comparisons between the exiting site and the proposed. This includes timber cladding to the end of each row of containers as suggested to the LPA during recent online meeting, which appeared to be well received.

The further planting proposed will enhance the exiting screening which is already thorough and dense enough to screen the site from public view as illustrated in figures 6 and 7 of the Planning Justification Statement. The proposed planting is primarily for additional winter screening. The proposed evergreens can grow 15m high, sufficiently screening the maximum container height year round.

In this regard, it is considered that the design clearly meets DM4 b and i.

Economic Impacts

The LPA have raised concerns that the proposal does not significantly contribute to economic growth or job creation. Following discussion with the LPA, it is apparent that there is no established point of reference for what defines 'significant' contribution or growth.

The supporting 'Economic case for self storage 10F-8-23' outlines that self-storage has a combined annual turnover of SMEs at £1.8 trillion, helping to support and stimulate SME's in HBBC indirectly with a cost effective and accessible storage solution.

The proposal will support the employment of 4 full time staff.

Interpretation of DM4

Correspondence with the LPA has indicated they require both economic and visual factors to be addressed, as outlined above. However, it is noted that the wording of Policy DM4 requires enhancement of the immediate setting (b) OR economic contribution (c). The policy requires *either*, not both of these factors to be met.

Conclusion

This addendum, in tandem with traffic data, turning circle and visibility splay drawings, illustrated enhancement, lighting plan and details of the economic case for self storage containers address the concerns raised by the LPA and their colleagues at the LHA and EA.