

Substantive response of the Local Highway Authority to a planning consultation received under The Development Management Order.



Response provided under the delegated authority of the Director of Environment & Transport.

APPLICATION DETAILS:

Planning Application Number: 23/00519/FUL

Highway Reference Number: 2023/0519/04/H

Application Address: Eastwoods Service Station Ashby Road Stapleton Leicester Leicestershire
LE9 8JE

Application Type: Full

Description of Application:

Proposed storage container site with replacement gate, associated landscaping and 2 non-illuminated advertisement boards

GENERAL DETAILS

Planning Case Officer: Joseph Fleetwood HBBC

Applicant: Rakesh Odedra

County Councillor: Ross Hills

Parish: Peckleton

Road Classification: Class A

Substantive Response provided in accordance with article 22(5) of The Town and Country Planning (Development Management Procedure) (England) Order 2015:

The Local Highway Authority does not consider that the application as submitted fully assesses the highway impact of the proposed development and further information is required as set out in this response. Without this information the Local Highway Authority is unable to provide final highway advice on this application.

Advice to Local Planning Authority

Background

The Local Highway Authority (LHA) are in receipt of a consultation for a full application for a proposed storage container site (B8) with replacement gate and wall, associated landscaping and 2 non-illuminated advertisement boards at Eastwoods Service Station, Ashby Road, Stapleton.

Based on the submitted Planning Statement (dated 24 May 2023) the site is currently used as an ancillary storage area for primarily industrial units, the site is considered a B2 Use. The proposals are for a total of 214 self storage units.

Site Access

The Applicant is proposing to use the existing access to the site with no amendments. The site is accessed off Ashby Road, an A classified road (A447) subject to a 50mph speed limit. The LHA advise that consideration may need to be given to Part 1, Section IN5 of the Leicestershire Highway Design Guide ([LHDG, available at <https://resources.leicestershire.gov.uk/lhdg>) in the event the proposals intensify the use of the existing access, as per the Trip Generation section below. Notably, the LHA are mindful of Part 1, Section IN5, Paragraph 1.26 of the LHDG, which states:

We will normally apply restrictions on new accesses for vehicles and the increased use of existing accesses on:

- *roads with a speed limit above 40 mph (that is 50mph, 60mph or 70mph) or where measured vehicle speeds are in excess of 40mph;....".*

Notwithstanding the above, in the event the proposals intensify the use of the access, 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.

Highway Safety

The LHA is aware of seven Personal Injury Collisions (PIC's) which have occurred within 500m either side of the site access over the last five years, including two serious PICs. In the event the proposals are demonstrated to generate an increase in the number of trips to/ from the site, the LHA advise these will need to be considered by the Applicant. Further information on PIC data can be obtained by contacting NDI@leics.gov.uk.

Trip Generation

The Applicant has stated that

'the site measures approximately 3.7 ha. Based on Local Plan requirements, a B2 site of this scale may accommodate 9.25 HGV parking spaces and 74 car parking spaces. Comparatively, the proposed B8 classification may accommodate 9.25 HGV parking spaces and 37 car parking spaces'.

Given the nature of the site, it is reasonable to argue that, in reality 37 car parking spaces and nine HGV parking spaces will not be required. The site will be used by private individuals and small-scale local businesses. Cars and vans may access the site for unloading/loading but will not be permitted to park for long periods.

The significantly reduced car parking requirements resulting from the proposed development provides clear evidence that the overall number of potential traffic movement will be significantly decreased.

With regard to HGV movements, the site will experience a small number of movements for the setup process, however HGV traffic will also decrease significantly as containers are placed.'

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.

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.

Junction Capacity Assessments

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.

Internal Layout

While the LHA acknowledge that customers are likely only be at the site to load/ unload belongings, further consideration will be given to parking provision by the LHA following further evidence of trip generation.

Transport Sustainability

The site is in a rural location, however given the nature of the proposals it is accepted that customers are highly likely to be visiting the site in their own vehicle.

Date Received
8 June 2023

Case Officer
Ben Dutton

Reviewer
DH

Date issued
28 June 2023