

Planning Statement

In support of

Change of use of land for the siting of self-storage containers,
including associated works and BNG planting area

at

Ivy House Farm
Bilstone Rd
Congerstone
Nuneaton
CV13 6LW

Applicant

Mr T Sinnott

Agent

Sally Moore BSc (Hons) PgD MRICS FAAV

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Application summary	
Description	Change of use of land for the siting of self-storage containers, including associated works and BNG planting area
Site address	Ivy House Farm, Bilstone, Congerstone, Nuneaton, CV13 6LW
Applicant	Mr T Sinnott
Local Planning Authority	Hinckley & Bosworth Borough Council
Planning portal reference	PP-13437651
Job reference number	J1008878
Agent details	The Rural Planning Co, The Farm Office, Millridge Farm, Parsons Lane, Hartlebury, Nr Kidderminster, Worcestershire, DY11 7YQ. Telephone: 01299 667344 Email: team@theruralplanningco.co.uk

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1.0 Introduction

- 1.1 The Rural Planning Co. is instructed to submit this planning application for the change of use of land for the siting of self-storage containers on behalf of Mr Tim Sinnott (the applicant).
- 1.2 The site, which forms part of Ivy House Farm, is located within the administrative area of Hinckley and Bosworth Borough Council.
- 1.3 Ivy House Farm is situated off Bilstone Road on the southern end of Congerstone and comprises several agricultural buildings. This application specifically pertains to the change of use of land for the siting of self-storage located to the south-east of the site.
- 1.4 The proposal is for the siting of 94 containers and associated parking.
- 1.5 This Planning Statement supports the application by presenting the relevant site context, planning policies, and assessments, including those related to rural setting, heritage, ecology, and biodiversity.
- 1.6 The proposal aligns with national and local policies on rural economic development and farm diversification.
- 1.7 This Statement should be read in conjunction with the accompanying plans and documents submitted with the application.

2.0 Site Context

- 2.1 The application site forms part of a working farm sited to the south of the village of Congerstone. The parcel of land lies to the east of existing agricultural buildings and forms part of a larger field.
- 2.2 An existing storage facility exists on the site, to which this facility will form an extension of. The site is at the edge of an arable field directly south of the existing storage container facility and therefore will not harm the character of the area or create any additional visual impacts.
- 2.3 Farming practices have changed over the years including a move away from dairy farming in 2021 and now a focus on arable production. The farm business is actively looking for ways to repurpose otherwise underutilised space and expand farm diversification enterprises wherever possible in order to support the continued operation of the wider farm.

3.0 Planning History

- 3.1 A number of planning applications have been made in recent years relating to the agricultural activity on the farm, and the need for farm diversification. Recent applications are summarised below:

Reference	Description	Decision
24/01152/FUL	Change of use of existing agricultural building to commercial use (Class E- light industrial)	Permitted
24/00186/FUL	Application for an agricultural track	Permitted
23/00798/FUL	Change of use of an agricultural building (barn) to Class E(g)(commercial) and Class B8 (storage and distribution) and associated works	Permitted
23/00371/P3CR	Change of use of agricultural building to B8 storage use	Prior approval given
22/01174/FUL	Change of use, including partial reconstruction, and refurbishment of existing barn to Class C1 holiday let use including provision of ancillary hardstanding	Permitted
20/00997/FUL	Proposed self-storage facility (Use Class B8) and access road	Permitted

- 3.2 Most notable is the 2020 permission (approved in 2021 ref 20/00997/FUL) for a self-storage facility. This proposal required, amongst other things, the access arrangements into Ivy House Farm from Bilstone Road to be amended including the widening of the existing access road to 3.5m and laying out of a passing bay to increase the width to 5.5m at that point. The storage facility has been constructed and is fully operational, and the works to the access road have been completed.
- 3.3 The majority of other records for Ivy House Farm on HBBC's online register relate to a range of agricultural development and engineering operations prior to the sale of the dairy herd.

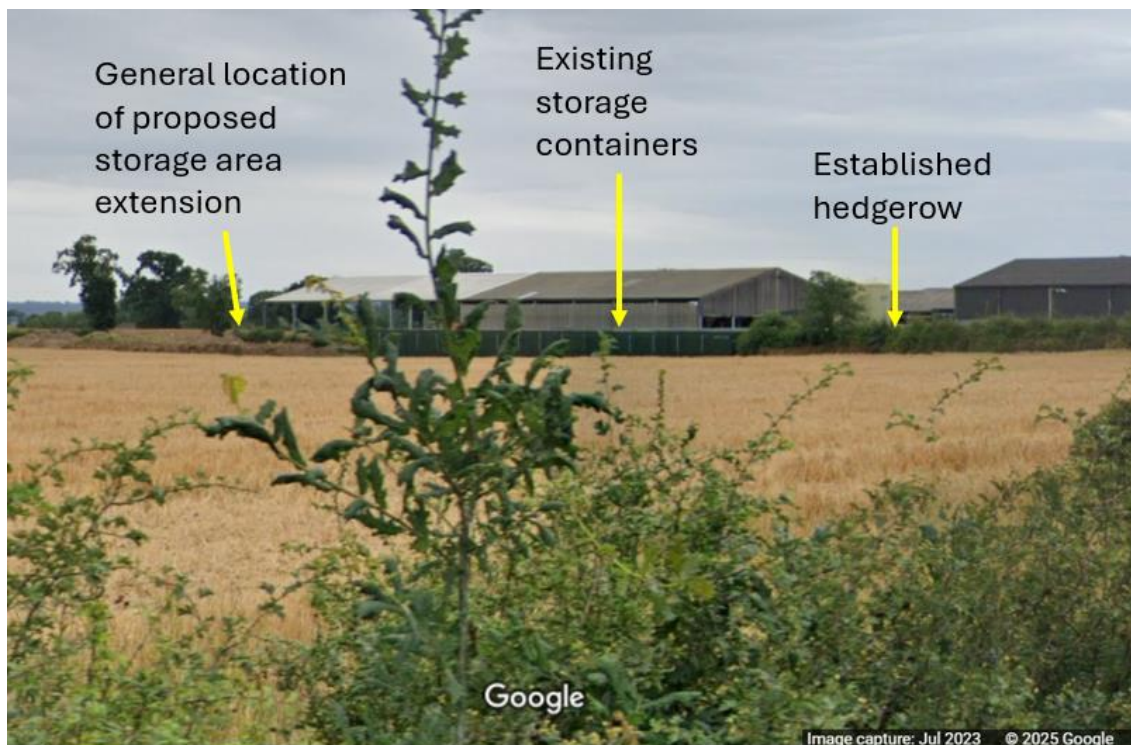
4.0 Proposed Development

- 4.1 The proposed development is for the change of use of land for the siting of storage containers, associated works, and the provision of an area to contain planting to comply with the requirements of the Biodiversity Net Gain regulations.
- 4.2 The associated works will include the provision of hard surfacing, appropriate parking spaces, and secure fencing.
- 4.3 The units will be used by local businesses and individuals that need storage for their belongings.

- 4.4 The self-storage units are provided through re-using steel shipping containers which are placed on the ground.
- 4.5 Business premises, whether offices or workshops for small businesses or sole traders are often very limited, particularly as they start to grow. Self-storage units have become essential for a number of reasons:
- Items can clutter up office space making it difficult for employees to work properly in comfortable surroundings;
 - Self-storage containers allow items to be kept securely, protecting them from robbery, fire or water damage;
 - Storage of items for businesses that function seasonally such as Christmas decorations, summer beauty products, and event materials;
 - Storage of legal documents, employee records, receipts, customer records, tax documents, other types of paperwork, machines, tools, and equipment of the business;
 - Self-storage containers are a cost effective solution for a business rather than having to rent additional office space; or
 - The move to home working generates a requirement for self-storage
- 4.6 Furthermore, many private individuals use storage containers for their personal belongings. This can either be a long-term arrangement (many modern homes have limited storage space so renting additional space can be a routine necessity) or a short-term solution for example for someone moving house or carrying out home renovations.
- 4.7 The existing storage facility on the site was established following the grant of planning permission, and has been very successful. The site is recognised as well run, secure, well located and serving an essential local need. Demand for storage on-site exceeds the existing provision, so the expansion is to directly serve a clear established local need.
- 4.8 The additional storage units proposed offer an important service to small businesses and individuals within the area, supporting the community and local rural economy as a result. Google Maps identifies two similar storage enterprises, one approximately 10km to the west outside Leicester and the other a similar distance to the south outside Moira. As such the competition for this type of facility in the local area is limited which will be detrimental for businesses requiring this type of service.
- 4.9 The total area covered by the proposal is 0.5ha, of which the existing access road covers 0.17ha; the proposed container storage area covers 0.29ha and the proposed planting area covers 0.04ha. The containers (the actual storage area) extends to 1,354m² (0.13ha). Each container will have a footprint of 6m x 2.4m to a height of 2.6m.

5.0 Visual impact

- 5.1 The layout, position and design of the proposed facility has been carefully considered to best meet the needs of the business while limiting associated impact.
- 5.2 Importantly, the facility will read within the setting and the wider landscape as an extension to the existing established storage facility. No alterations will be required to the existing access, and on-site parking will be provided.
- 5.3 The containers themselves are low impact; functional in style and coloured dark green.
- 5.4 Established mature boundaries screen the site; a mature hedge exists to the south of the facility and new hedge planting has already been provided along the eastern boundary. This planting will be extended to the south to border the proposed facility. The containers are similar in colour and height to an established hedgerow.
- 5.5 The existing container facility can be seen on Google Street View dated July 2023 (before additional trees were planted, which is explained further below) where it can be seen that the containers are modest in the landscape and blend in well with the existing vegetation and neighbouring buildings. The proposed containers will have no greater impact than the existing.



5.6

Figure 1 - view of existing containers and established vegetation. Source: Google Maps

- 5.7 Immediately to the south is a mature boundary hedge. Immediately to the north is the existing storage container facility. External views are therefore limited.

- 5.8 The parking area is to be located directly to the south of the facility, with surfacing to match that as existing on the site. Security fencing in a dark green colour will enclose the site in a visually sensitive manner. Drawings indicating the style and colour of the fencing and the containers are submitted alongside this application.
- 5.9 The applicant has already planted a large number of trees in a shelter belt formation along the eastern side of the facility, which serve not only to enhance biodiversity at the site but screen both the existing and proposed storage facilities and soften the overall landscaping of the area. The shelter belt was established in December 2023 and is maturing well. The location of this is shown on the block plan; this serves well as existing landscaping provision at the site.
- 5.10 This site has a number of different uses giving the appearance and character of an agricultural and commercial premises. With the storage containers' close association with the site to the north, they will read as part of the wider commercial use across the site.

6.0 Planning Policy

- 6.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The planning policies most relevant to this application are contained within the National Planning Policy Framework (NPPF) 2024 and the Hinckley and Bosworth Borough Council Core Strategy and Site Allocations and Development Management Policies 2016.

7.0 National Planning Policy Framework

- 7.1 The NPPF was updated in December 2024 and sets out the Government's planning policies for England and how these should be applied by Local Planning Authorities (LPAs).
- 7.2 At the core of the NPPF is the ability to deliver and the presumption in favour of sustainable development. Paragraph 8 confirms this setting out that:
- '...achieving sustainable development means that the planning system has three overarching objectives which are independent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)':
- 'a. **an economic objective** – to help build a strong, responsive and competitive economy...to support growth and innovation'
- 'b. **a social objective** - to support strong, vibrant and healthy communities...and support communities' health, social and cultural well-being'
- 'c. **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving

biodiversity, using natural resources prudently'

7.3 Paragraph 9 of the NPPF states that:

'Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.'

7.4 Paragraph 38 of the NPPF states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative ways...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision- makers at every level should seek to approve applications for sustainable development where possible.'

7.5 Other key paragraphs of the NPPF include:

7.6 Paragraph 85, which states that

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development...'

7.7 Paragraph 88, which states that "planning policies and decisions should enable:

"a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings".

7.8 Paragraph 89, which states that "planning policies and decisions should:

'recognise that in order to meet local business and community needs in rural areas, sites may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings [and] does not have an unacceptable impact on local roads...'

7.9 The NPPF provides strong support for rural businesses. In this particular instance, the site lies in the open countryside, however the site is well located with regards to surrounding villages with good road access.

7.10 Section 12 of the NPPF is concerned with achieving well designed places as a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

8.0 Site Allocations and Development Management Policies DPD (2016)

- 8.1 DM1 Presumption in Favour of Sustainable Development states that 'Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.'
- 8.2 DM4 Safeguarding the Countryside and Settlement Separation supports development in the countryside where 'It significantly contributes to economic growth, job creation and/or diversification of rural businesses; or' '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'.
- 8.3 DM6 Enhancement of Biodiversity and Geological Interest notes that 'On site features should be retained, buffered and managed favourably to maintain their ecological value, connectivity and functionality in the long-term.'
- 8.4 DM10 Development and Design requires development to 'a) not have a significant adverse effect on the privacy and amenity of nearby residents and occupiers of adjacent buildings, including matters of lighting, air quality (including odour), noise, vibration and visual intrusion;', 'complement or enhances the character of the surrounding area with regard to scale, layout, density, mass, design, materials and architectural features', 'The use and application of building materials respects the materials of existing, adjoining/neighbouring buildings and the local area generally;' and that 'It incorporates a high standard of landscaping where this would add to the quality of the design and siting;'
- 8.5 DM17 Highways and Transportation supports proposals where they can 'demonstrate that there is not a significant adverse impact upon highway safety'.
- 8.6 DM18 Vehicle Parking Standards requires proposals to allow an appropriate level of parking provision.
- 8.7 DM20 Provision of Employment Sites states that B8 uses will be supported on previously developed land, and where no suitable alternative sites exist.

9.0 Planning Assessment

9.1 This section of the Planning Statement provides an assessment of the key material considerations against the most relevant planning policies contained within the Local Development Plan. Each planning application needs to be assessed on its own merits, taking account of the key material considerations which in this case include:

- Farm diversification
- Economic benefits
- Design
- Heritage
- Sustainable transport
- Access
- Parking
- Biodiversity
- Water management

10.0 Farm Diversification

- 10.1 Farming is vital for the British economy and food security. As a sector, it is worth over £120 billion and employs over 4 million people with over 149,000 businesses. Because of this, farming offers huge potential to the rural economy as a whole.
- 10.2 However, the farming industry is exposed to a large amount of risk, volatility and uncertainty, not least that caused by outside political and economic factors, such as Brexit and recent foreign wars.
- 10.3 The Government has been reducing farm subsidies in recent years and direct payment are almost entirely lost with no direct replacements. This places further strain and pressure on farm businesses, requiring them to look elsewhere for non-agricultural forms of income.
- 10.4 The National Farmers Union is clear that access to a competent and reliable workforce is vital for UK food production. However, changes to the immigration system and the end of the free movement of EU workers that has resulted from the UK leaving the Single Market have resulted in labour shortages.

- 10.5 The industry is dependent on the weather which is impacted by the effects of climate change. If it's too dry, crops won't grow. If the season is too wet, crops can rot and suffer from mould or simply drown in the standing water. A late or early frost can leave an entire field worthless. This all impacts on the farmer's profitability which can be felt for many years after a particularly bad harvest.
- 10.6 Given this, 71% of all farm businesses in England also run other enterprises as of 2023/24- such as farm shops, commercial ventures and B&Bs (Department of Rural Affairs, Farm Accounts in England Results from the Farm Business Survey 2023/24).
- 10.7 Seeking alternative forms of income is absolutely essential for the survival of family farms.
- 10.8 The Core Strategy is supportive of farm diversification schemes in principle, setting out the criteria in policy DM4 of the SADMP.
- 10.9 The site is outside the settlement boundary of Congerstone and does not form part of an existing employment site allocation in the Development Plan. Policy DM4 of the SADMP therefore applies which allows for sustainable development within the countryside providing it meets certain criteria. In land-use terms, the criterion relevant to this commercial use would be:
- 10.10 'c) it significantly contributes to economic growth, job creation and/or diversification of rural businesses' [our emphasis].
- 10.11 Since the dairy herd has been sold, some areas of the farm have become surplus to operational requirements. This underused corner of a field adjacent to the existing storage facility represents an expansion which would generate an additional income stream for the farm, and as such constitutes a rural diversification project for which there is in principle support under both Policy DM4 of the SADMP and the NPPF.
- 10.12 Policy DM4 also identifies other factors which should be considered as part of this proposal in terms of design and impact on the countryside. These are considered below, together with compliance with other development management-related policies and associated paragraphs of the NPPF.
- 10.13 Policy DM20 requires alternative sites to be considered. As this is a farm diversification proposal, only sites within the farm complex are available and appropriate for consideration; the use needs to be located on land adjoining the existing farm.

11.0 Economic benefits

- 11.1 Sustainable development is at the heart of the NPPF and is likened to a 'golden thread' running through both plan-making and decision-taking.

- 11.2 Paragraph 85 of the NPPF gives significant weight to development which supports economic growth and productivity taking into account both local business needs and wider opportunities for development. Delivering economic prosperity is a key objective of Hinckley & Bosworth Core Strategy and is entirely consistent with the NPPF in this regard.
- 11.3 In weighing the planning benefits and potential impacts of the proposed development, careful consideration has been given to the overall site context and the evolution of its intended use. Without the dairy herd, need and use of the farmyard and surrounding areas has changed. The intention behind this application is that the site can transition to a diversified, economically productive use, contributing to local economic growth while maintaining the integrity of rural land use in accordance with policy DM4 of the SADMP.
- 11.4 Policy CM4 specifically encourages farm diversification to support economic vitality in rural areas, provided it respects the local character and agricultural legacy. The proposal aligns with this policy by promoting sustainable development that enhances the site's economic value without detracting from its rural setting. This approach ensures the site remains viable and continues to contribute to the regional economy, aligning with broader planning goals for rural regeneration and sustainable land use.

12.0 Design

- 12.1 Policy DM4 of the SADMP requires that development in the countryside 'does not have an adverse effect on the intrinsic value, beauty, open character and landscape character of the countryside'.
- 12.2 Policy DM10(d) of the SADMP seeks to ensure that the use and application of building materials 'respects the materials of existing, adjoining/neighbouring buildings and the local area generally'. The chosen materials, size and colours of the containers will blend in well with the existing development and established landscaping at the site and will be softened further by additional tree planting proposed.
- 12.3 Policy 17 of the CS states that employment facilities adjacent to the settlement boundary will be permitted subject to criteria which includes that the development is 'of a scale and design which fully respects the character of the settlement concerned and the level of need identified'.
- 12.4 The Borough's Landscape Character Assessment (2017) identifies the site within Landscape Character Area G – Sence Lowlands (LCA-G). The key characteristics of this relevant to the site are flat to gently rolling lowland vale landscape and well ordered agricultural landscapes with a regular pattern of rectilinear fields and small villages with a strong sense of place. The application site is typical of this style but notably is not a 'valued landscape' for the purposes of paragraph 187 of the NPPF, nor does it have any specific designations.

- 12.5 The proposed development requires no new buildings. The scale of the proposal has been designed to utilise the corner of the field and benefit from the infrastructure already in place to support the existing storage facility. The containers will be viewed against the backdrop of the existing buildings on site and mitigated against through additional planting including trees and a new hedgerow along the eastern boundary.
- 12.6 Operating hours of the facility will mirror those of the existing facility; between the hours of 0800 and 1700 each day, with no artificial lighting. This design led mitigation reduces any risk of impacting on neighbouring residential properties.
- 12.7 The design is entirely consistent with the existing agricultural appearance and character of the farm complex and wider area.
- 12.8 Accordingly, the proposed development should be considered to comply with Policies DM4, and DM10 of the SADMP and Policy 17 of the CS in respect to design and conservation.

13.0 Heritage

- 13.1 Policy DM12 of the SADMP states that development proposals should ensure the significance of conservation areas, and their settings is 'preserved and enhanced'.
- 13.2 Ivy House Farm does not contain any designated or non-designated heritage assets. The nearest designated heritage asset to the site is understood to be the Congerstone Conservation Area which at its nearest point is over 165m from the site (measured from the curtilage of the Horse and Jockey Public House).
- 13.3 The design is entirely consistent with the existing agricultural appearance and character of the farm complex and wider area and accordingly would also not lead to harm to the significance of Congerstone Conservation Area and its setting.
- 13.4 Accordingly, the proposed development should be considered to comply with Policies DM12 of the SADMP in respect to design and conservation.

14.0 Sustainable Transport

- 14.1 While paragraph 109 of the NPPF encourages that development is focused on sustainable centres, it recognises that transport solutions will vary between urban and rural areas. This needs to be considered in the decision-making process.
- 14.2 Paragraph 89 of the NPPF furthers this in encouraging decision-makers to recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

- 14.3 Considerations of sustainable transport need to be assessed against that set out in the NPPF paragraphs along with the economic benefits of the scheme.
- 14.4 Given that the great majority of farms lie outside 'sustainable' centres and diversification schemes such as this are encouraged by the NPPF and Core Strategy, it must be recognised that the proposed is one such situation that needs to be considered in rural areas.

15.0 Access

- 15.1 It is proposed to utilise the existing access that connects the site to Bilstone Road. The access currently serves the existing farm and had been in situ for 15+ years. As such there are not considered to be any issues of that proposed with regards to highway safety.
- 15.2 Visibility splays of 43m to the east and west were detailed within the 2021 permission for the existing storage facility, and access arrangement including the widening of the access road to 3.5m and laying out of a passing bay to increase the width to 5.5m at that point were agreed and implemented as part of the consideration and delivery of that application. No changes to the access arrangements are currently proposed; the access access is considered suitable and safe access by emergency vehicles is provided along with turning space.
- 15.3 Traffic and trip generation was considered within the 2021 application, with the conclusion that the design of the access and the visibility would be acceptable, and that the worst-case trip generation (based on TRICS data) would not result in an unacceptable impact on the local highway network. That was based on the 56 containers having a maximum of 26 two-way trips per day, with 4 trips during the peak time of between 1200 and 1300.
- 15.4 As the current facility has been up and running for some time, it has been possible to establish true numbers for how many vehicles access the site on a daily basis. This is accurately recorded based on how many people access the secure gate system. This is significantly less than the TRICS data due to the nature of the site; many people might visit the site more when they first take on the container, but access beyond that becomes much more infrequent.
- 15.5 Over the last 12 months, on average just 3.12 cars have accessed the site for two-way trips per day. Using that data to predict actual movements for the additional 94 containers proposed, the likely two-way trips per day would be approximately an additional 5.3 per day. This is a total for the entire storage at the farm of just 8.42 trips per day; less than a third of the worst case scenario TRICS prediction which has already been considered acceptable.

- 15.6 It is clear therefore that although the proposal will lead to an intensification in the use of the site, the existing access is sufficiently designed and suitable to accommodate the proposal and the likely trips generated are not considered to result in a severe impact on the local highways network.

16.0 Parking

- 16.1 The Leicestershire County Council Highway Design Guide was updated in 2024. This outlines that for non-residential development within use class B8 (storage and distribution), the requirement would be for 1 parking space per every 100sqm, plus one lorry space (articulated vehicle) for every 400sqm. The development proposes storage space extending to 1,354sqm (94 containers). 14 spaces are provided to comply with this requirement, plus one enlarged space to provide accessible parking (in excess of 5% of the total spaces required).
- 16.2 It is not considered appropriate within this development for parking for articulated vehicles to be provided. No lorries will be permitted access to the storage facility and this is controlled through the agreement of specific terms and conditions signed by users of the site. It is considered that a planning condition to confirm the same would be appropriate and welcomed on this occasion.
- 16.3 Given the details on likely trip generation as set out above, the proposal is unlikely to have more than 5.3 cars requiring access per day, so the 15 spaces on site will be more than sufficient to meet the needs of the facility. It is important to note also that there will be no requirement for employees at the site so the parking is only for users of the storage facility.

17.0 Biodiversity

- 17.1 A Preliminary Ecological Appraisal has been carried out at the site by ecologists Arbor Vitae Environment Ltd, along with consideration and recommendations for how to achieve the necessary 10% Biodiversity Net Gain.
- 17.2 The report concludes that the habitat to be affected by the proposed development is of limited ecological significance and goes on to confirm that the proposals are not expected to have any negative impact on badgers, bats, breeding birds, great crested newts or otters. A Wildlife Sensitive Lighting Scheme is recommended, but as set out previously within this statement, no artificial lighting is proposed at the site.
- 17.3 Biodiversity Net Gain will be achieved through the planting of 48 small native trees within an area adjacent to the proposed storage area, along with the planting of 415m² of modified grassland as an area to plant the trees.

18.0 Water Management

- 18.1 Policy DM7 of the SADMP requires that developments demonstrate that any site drainage and runoff will be managed in a sustainable way and disposed of appropriately. The level of information required will depend upon the development proposed.
- 18.2 Surface water will be managed through the use of permeable surfacing underneath the containers themselves, which will then drain away to the nearest watercourse through field drainage.
- 18.3 The site is outside any areas at risk of flooding from rivers and seas, reservoirs or surface water as designated by the Environment Agency, and no known flooding issues have occurred on the site. The site is located within Flood Zone 1.

19.0 Conclusion

- 19.1 The proposal is for the change of use of the land for storage containers and associated infrastructure.
- 19.2 Both the NPPF and the Site Allocations and Development Management Policies DPD (2016) support the sustainable growth and expansion of all types of business in rural areas. The scale of the business is appropriate for the location having good road access, within a site already used for a variety of commercial uses and in close proximity to a number of villages.
- 19.3 In this case the low profile storage units are designed for function, modest in height when compared to the existing buildings on the site to the north and adjoining site to the south. Painted a discrete colour, and well screened to help them assimilate into the wider open countryside. They are set back from the public road and are screened by an existing mature hedges.
- 19.4 Notably, this is an expansion of an existing facility; it has been demonstrated that demand for storage facilities at the site exceeds the current offering and the facility will therefore meet an identified current local need.
- 19.5 There are no identified issues in terms of highway safety, manoeuvring on the site, biodiversity or flooding.
- 19.6 As such planning officers and Councillors should support this proposal and approve the application.

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