

PLANNING STATEMENT

In respect of

Storage King, Phoenix Retail Park, Leeds Road, Huddersfield, HD1 6NE

On behalf of

MJM Acquisitions Ltd (trading as Storage King)

Planning Statement
1.0
June 2023

PLANNING STATEMENT

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Suzy Wilson

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Prepared by:

RPS

20 Farringdon Street
London, EC4A 4AB

Prepared for:

MJM Acquisitions Ltd (trading as Storage King)

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1 INTRODUCTION

Background

- 1.1. RPS Consulting Services Limited (RPS) act on behalf of our client, MJM Acquisitions Ltd, trading as Storage King, which is a UK-operated self storage company with storage locations across the UK. Our client wishes to expand their existing operations at their premises in Huddersfield which are located at the Storage King, Phoenix Retail Park, Leeds Road, Huddersfield, HD1 6NE (“the site”). A site location plan is submitted with the application.
- 1.2. Accordingly, this planning statement is submitted to Kirklees Metropolitan Council (hereinafter “the Council”) in support of an application for full planning permission for:
“New building for extension to existing self storage facility (Class B8).”
- 1.3. Pre-application advice was sought and was provided by the Council on 31st October 2022. The Council noted their support of the principle and design of the development. Chapter 3 of this Statement provides full details of the pre-application response.

Scope of Application

- 1.4. This Planning Statement should be read with the submitted drawings by MAA Architects and the following application documents:
 - Planning Application Form;
 - Arboricultural Impact Assessment, prepared by RPS;
 - Biodiversity Net Gain Assessment, prepared by RPS;
 - Biodiversity Net Gain Calculations, prepared by RPS;
 - Built Heritage Statement, prepared by RPS;
 - Design and Access Statement, prepared by MAA Architects;
 - Energy and Sustainability Statement, prepared by SRE;
 - Flood Risk and Drainage Strategy, prepared by RPS;
 - Landscaping Strategy, prepared by RPS;
 - Phase 1 Contamination Assessment, prepared by WSP;
 - Preliminary Ecological Assessment, prepared by RPS; and
 - Transport Statement, prepared by RPS.
- 1.5. This report should be structured as follows:
 - Section 1 – Introduction
 - Section 2 – Site Context;
 - Section 3 – Planning History;
 - Section 4 – Proposed Development;
 - Section 5 – Policy Context;
 - Section 6 – Planning Assessment; and
 - Section 7 – Conclusions
- 1.6. The following section identifies key aspects of the Site and its surrounding area.

2 SITE CONTEXT

The Site and Surrounding Area

- 2.1. The site is located within the administrative authority of Kirklees Metropolitan Council and measures approximately 0.33ha. The site is situated within the Phoenix Retail Park on Leeds Road (A62), a designated Priority Employment Area. The site currently comprises a large commercial unit, occupied by the Storage King self storage facility (Use Class B8) and DFS (Use Class E(a)), and a surface level car park at the frontage which has capacity for 125 cars. The car park is at a sunken level separated from Leeds Road by a retaining wall and bank of landscaping and there is also some tree planting within the car park.
- 2.2. The existing building is 2 storeys in height with the main pedestrian entrance off Leeds Road. The car parking is served by two access roads, Grove Road which abuts the site to the south and Learoyd Street which abuts the site to the north. Grove Road also provides access to the servicing yard and loading area at the rear of the site (east).
- 2.3. The buildings immediately surrounding the site are industrial/warehouse and commercial in character. Retail and commercial units are located to the north and east, including a car dealership of a contemporary design. To the south of the site, there is a Grade II listed property which comprises of a 3 storey building which is currently used as a retail and office space. There are no residential properties in close proximity to the site.
- 2.4. There are no Listed or Locally Listed Buildings on the site and the site is not located within a designated Conservation Area. There are no Tree Preservation Orders (TPOs) on or in close proximity to the site.
- 2.5. RPS have undertaken a review of the Kirklees Strategic Flood Risk Assessment Information and the Environmental Agency's flood data and confirmed that the site is located within Flood Zone 1 and has a 'low' risk of fluvial flooding.
- 2.6. In terms of transport connections, the site is located adjacent to Transport Scheme Route (Leeds Road). The site has good connection to artery roads through Huddersfield. Huddersfield train station is located 600m away from the site. The nearest bus stop (Leeds Road Thistle Street) is located approximately 200m north of the site along Leeds Road.



Figure 1: Site Location (Google Maps ©2023)

- 2.7. The following section outlines the Site's planning history and the pre-application discussions held with Council officers.

3 PLANNING HISTORY

Planning History Records

3.1. The Council's online planning search returned the following planning history records relevant to the application site:

Reference	Description of Development	Decision Date	Decision
2020/62/91260/W	Change of use from A1 (retail) to B8 (storage and distribution).	Approved	18/09/2020
98/70/92982/W2	Variation of condition 10 relating to retail use of premises on previous permission 97/62/91237 for erection of non-food retail units (30,000 sqft.) with associated car parking, servicing and landscaping.	Approved	18/12/1998
97/62/91237/W2	Erection of non-food retail units (30,000 sqft) with associated car parking, servicing and landscaping.	Approved	11/09/1997

3.2. The planning history relates to development associated with the existing self storage unit and the Council's planning history records outline that 3 applications were approved as set out in the table above.

3.3. The most recent permission, ref: 2020/62/91260/W, was granted on 18th September 2020 for the "Change of use from A1 (retail) to B8 (storage and distribution)". A review of Google Maps indicates that this permission was implemented at some point between the date it was granted and October 2020 at which point the site was occupied by 'McCarthy's Storage World', after which Storage King occupied the site. It is therefore understood that permission 2020/62/91260/W established the lawful B8 use for the site and as such, comprises the operative consent.

Pre-Application Advice

3.4. This planning application has been made following pre-application advice from William Simcock (Planning Officer) at Kirklees Council, received on 31 October 2022 (Local Planning Authority reference 2022/21179). The Council's full written pre-application response is included within Appendix A.

3.5. The Council were supportive of the principle of development as the site is located within a Priority Employment Area and therefore, there is a presumption in favour of development for employment-generating uses in accordance with Local Plan Policy LP8 (Safeguarding employment land and premises).

3.6. In terms of transport, the Council outlined that Officers had reservations as to whether a sufficient level of parking would be retained as a result of the development. However, a service management plan contained within a future Transport Statement should help clarify the type and size of vehicles entering and exiting the site's car park to use the proposed loading bay to the rear of the proposed building.

3.7. In accordance with Local Plan Policy LP20 (Sustainable Travel) and Policy LP23 (Core Walking and Cycling Network), the Council advised that the provision of cycle storage facilities for employees should be considered.

3.8. Regarding impact on visual amenity and heritage considerations, the Council raised concerns that the development as previously proposed would be higher than the BMW sign on the neighbouring plot. Additionally, the Council recommended that the roof of the amended scheme should be finished with a stone parapet instead of a fascia and that the design of the corner glazed element should be

simplified, so that the development responds better to local vernacular. The Council also considered that the proposed development would not harm or detract from the setting of the Listed Building (York House) given their sufficient proximity away from each other.

- 3.9. The Council outlined that the site is not located within the vicinity of any residential properties.
- 3.10. The Council detailed that a Flood Risk Assessment should accompany any future application on the basis that the site is located within Flood Zone 2/3a according to the Council's Strategic Flood Risk Assessment. Therefore, that a sequential test should be undertaken. Furthermore, the Council advised that any future application would be required to state what methods are to be used for surface water disposal, taking into account the drainage hierarchy.
- 3.11. The Council set out that within any future application, it must be demonstrated how the proposed development would contribute to the Council's ambition to have net zero emissions by 2038.
- 3.12. The Council suggested that the land is potentially contaminated due to its former uses and is also within the 200m buffer zone of an historic landfill site. Therefore, contaminated land information was requested to be provided with a future application.
- 3.13. The Council clarified that in the event of planning permission being granted, some form of biodiversity net gain would need to be delivered dependent on the views of the Ecology Officer. This may include artificial bat roost features or bird boxes, in accordance with Local Plan Policy LP 30 (Biodiversity and Geodiversity) and Policy LP31 (Strategic Green Infrastructure Network).
- 3.14. The design of the Proposed Development has evolved since the previous pre-application discussions and seeks to address the issues raised in the pre-application comments above. Therefore, Chapter 6 of this Planning Statement and the supporting application documents demonstrate how these matters have been effectively addressed.
- 3.15. The following section provides an overview of the final Proposed Development.

4 PROPOSED DEVELOPMENT

- 4.1. MJM Acquisitions Ltd, trading as Storage King, is an operated self storage company with storage locations right across the UK. Our client wishes to expand their current business in the UK and improve the self storage provision at the existing site within Huddersfield.
- 4.2. There is growing demand for self storage facilities countrywide and MJM Acquisitions Ltd, trading as Storage King, seek to provide an improved service to the area and to small businesses and individuals who rely on self storage space to operate their own businesses. There is a growing trend towards self-employment and start-ups in the UK, meaning that self storage provides efficient and cost-effective options for these businesses for flexible storage, with little commitment and additional helpful business services. There are also significant benefits to personal users such as residents for house moving and for those needing to store whilst travelling.
- 4.3. As outlined in the preceding sections of this Statement, the Proposed Development is for the erection of a new three storey building (Use Class B8) to be located at the front of the existing site, towards Leeds Road, which provides an extension of the existing self storage facility's use.
- 4.4. The design of the scheme was found largely supported during the pre-application by the Council. Minor design alterations have been made following the most recent pre-application advice and are summarised below:
- Increased use of stone materials
 - Inclusion of stone parapets
 - Simplified glazing
 - Disabled and EV parking provision have been provided
 - Additional tree planting and landscaping
- 4.5. The proposed development includes a fixed floor area of 960sqm (GIA), consisting of additional self storage space, plus a lift lobby with a lift that extends to all floors and a new loading bay. The extension would have the potential for two additional dismountable mezzanine levels to be installed above ground floor level which could provide a floorspace of up 1,920sqm (GIA).
- 4.6. The proposed development comprises a high-quality appearance, utilising a mix of stone brickwork, stone detailing and complimentary coloured rendering to define the façade. Further details of the materials can be found within the submitted Design and Access Statement.
- 4.7. The proposal includes the retention of 65 of the existing car parking spaces (of which 5 are disabled parking spaces) and the installation of EV charging points for two of the existing car parking spaces. The existing cycle parking spaces at the entrance of the existing building will be covered by a new shelter to improve the cycling facilities. The vehicular access points from Grove Road and Learoyd Street remain the same and provide access to the car parking spaces and new loading bay.
- 4.8. PV panels are proposed on the rooftop of the new extension and additional landscaping is proposed on the site frontage and within the existing car park, including 11 trees, shrubs and hedges.
- 4.9. Full details of the proposed scheme and the proposed internal layout of the building are provided on the accompanying drawings and within the Design and Access Statement. The following section summarises the relevant planning policy considerations.

5 POLICY CONTEXT

5.1. In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.2. The adopted Development Plan for Kirklees Council comprises:

- Kirklees Local Plan Strategy and Policies (Feb 2019);
- Kirklees Allocations and Designations Plan (Feb 2019); and
- Development Plan Policies Map (2019).

5.3. The Council's adopted Local Plan Policy Map (2019) identifies that the Site is located within the following designations:

- Priority Employment Area
- Biodiversity Opportunity Area
- Existing Strategic Infrastructure Network

5.4. The relevant Development Plan policies are:

Kirklees Local Plan Strategy and Policies (Feb 2019)

- Policy LP1 (Presumption in favour of sustainable development)
- Policy LP2 (Place Shaping)
- Policy LP3 (Location of new Development)
- Policy LP7 (Efficient and effective use of land and buildings)
- Policy LP8 (Safeguarding employment land and premises)
- Policy LP20 (Sustainable travel)
- Policy LP21 (Highways and access)
- Policy LP22 (Parking)
- Policy LP23 (Core walking and cycling network)
- Policy LP24 (Design)
- Policy LP27 (Flood Risk)
- Policy LP28 (Drainage)
- Policy LP30 (Biodiversity and Geodiversity)
- Policy LP31 (Strategic Green Infrastructure Network)
- Policy LP33 (Trees)
- Policy LP35 (Historic Environment)
- Policy LP51 (Protection and Improvement of Local Air Quality)
- Policy LP52 (Protection and Improvement of Environment Quality)
- Policy LP53 (Contaminated and unstable land)

Kirklees Allocations and Designations Plan (Feb 2019)

- PEA16 (St Andrews Road, Huddersfield)

Supplementary Planning Documents.

- 5.5. The following Supplementary Planning Documents (SPDs) have been considered as part of the evolution of the proposed development:
- Kirklees Highway Design Guide (2019); and
 - Climate Change Guidance for Planning Applications (2021).

Emerging Policy

- 5.6. The Council are not in the process of reviewing or updating the current development plan. Therefore, there are no emerging planning policies that need to be considered.

Material Considerations

- 5.7. Consideration should also be given to the National Planning Policy Framework (NPPF) (2021) and National Planning Policy Guidance (an online guidance relaunched in 2014).
- 5.8. The following section of this Statement assesses the proposed development against this planning policy context.

6 PLANNING ASSESSMENT

Principle of Development

- 6.1 The NPPF includes a presumption in favour of sustainable development (paragraphs 10 and 11). This means approving development proposals that accord with an up-to-date development plan without delay.
- 6.2 Local Plan Policy LP1 (Presumption in Favour of Sustainable Development) identifies that the Council will take a positive approach that reflects the presumption in favour of sustainable development.
- 6.3 Local Plan Policy LP2 (Place Shaping) states that all development proposals should seek to build on the strengths, opportunities and help address challenges identified in the Local Plan, in order to protect and enhance the qualities which contribute to the character of these places.
- 6.4 Local Plan Policy LP3 (Location of New Development) requires development to reflect the settlement's size and function, opportunities and challenges for growth and the need to provide for new jobs. Development will be permitted where it supports the delivery of employment growth in a sustainable way.
- 6.5 Local Plan Policy LP7 (Efficient and Effective Use of Land and Buildings) encourages the efficient use of previously developed land in sustainable locations and the reuse or adaptation of vacant or underused properties.
- 6.6 Local Plan Policy LP8 (Safeguarding Employment Land and Premises) states proposals for development or re-development for employment generating uses (including Use Class B8) in Priority Employment Areas will be supported where there is no conflict with the established employment uses. The site is location within the 'St. Andrews Road, Huddersfield' Priority Employment Area which been set out to meet the requirements of the Safeguarding Employment Land and Premises policy.
- 6.7 With specific regard to the proposed self storage use, there is growing demand countrywide for self storage facilities including from the entertainment and construction industries. Users of self storage facilities include:
- Businesses - from start-ups to large international businesses (including those who import and export)
 - Working from home
 - Business relocation
 - Marketplace traders
 - Receipt and dispatch businesses
 - Archive storage
 - Tools and material storage
 - Charities
 - Stock storage (for business - managing demand for goods; supply replenishment)
 - Warehouse storage/Last mile drop
 - Education institutions
 - Government Parties and Departments
 - Personal Users (moving to a new house or additional storage space)
- 6.8 Self storage facilities provide significant benefits to the economy and smaller businesses in particular. A Storage King Customer Survey has recently been undertaken. The survey confirmed that over

68% of their business customers are limited companies and 21% are sole traders. The survey also found that 53% of business tenants had been in operation for more than ten years, while almost 15% of businesses surveyed are younger than three years. These figures give a clear indication of the vital role self storage facilities provide for both established companies and business start-ups.

- 6.9 Furthermore, working from home, flexible working, entrepreneurship and e-commerce has led to an increase in the number of new businesses being set up from home and existing businesses moving to that situation, or requiring more space. In addition, cost considerations have led to businesses occupying less high street space and holding goods off-site in self storage units where costs are significantly cheaper.
- 6.10 Similarly, self storage take-up has increased where businesses have expanded and needed more space but are not in a position to take on more permanent space. This enables the establishment and growth of small and medium-sized businesses (SMEs). The survey showed that approximately 30% of self storage space is occupied by small start-up businesses or SMEs.
- 6.11 The importance of self storage in local business communities is considered critical as the product forms part of their everyday business, with no long-term lease commitments and the ability to upsize or downsize whenever required. This means that businesses can be extremely prudent in their spending, only paying for the amount of space they need at that time. This significantly reduces the financial risk that small businesses are exposed to, particularly when considering the recent impact of COVID-19 on all business sectors across the UK.
- 6.12 The customer survey also found that 36% of the businesses surveyed are located less than 2 miles from the store and almost 17% of those surveyed noted the store location to their business and their customers as the primary reason for choosing a self storage facility. This indicates that a significant proportion of users are local and that self storage facilities create a direct positive effect on the local economy.
- 6.13 The effect on the local economy also includes significant indirect employment benefits. The customer survey results show that the average Storage King customer has created approximately 6.3 jobs since storing with them. This means that Storage King is directly linked to the creation of nearly 10,000 new jobs which equates to approximately 450 jobs per store. This figure would be higher if data on past tenants were also available.
- 6.14 Notably, over 5% of the business customers surveyed have directly created more than 50 new jobs since becoming a Storage King customer. Various other businesses, such as logistics/transportation and packaging companies, also benefit from the product through the services they provide to business customers. Additional jobs are also indirectly created through maintenance of lifts, construction and renovation, plumbing services etc.
- 6.15 Given the above figures, the true employment-generating figure associated with a self storage facility is actually considered to be even higher and therefore it is clear that significant employment benefits can be attributed to self storage facilities.
- 6.16 There is a clear and visible growth in the self storage sector and a number of self storage operators have undertaken research and produced reports showing how the provision of self storage units supports wider economic benefits.
- 6.17 The extension to the existing self storage facility is supported by the Council's Local Plan and site designations. The proposed use will generate a number of direct and indirect jobs, therefore enhancing the employment use at the site, within the designated 'St. Andrews Road' Priority Employment Areas, in accordance with Local Plan Policy LP8. Furthermore, the extension will not have a detrimental impact on the continuing operation of existing businesses and established employment uses in the vicinity.
- 6.18 The proposed development will utilise previously developed land and provide a greater economic and employment use within the designated Priority Employment Area. In addition, the proposed

development would increase the viability of the site and area and would support the Council's objectives to increase employment opportunities and support growth.

- 6.19 The Council's pre-application advice confirms that the principle of the development is supported at this location and supports the wider social and environmental sustainability objectives within the Local Plan.
- 6.20 The proposal will deliver the economic and social objectives of sustainable development by supporting growth and improved productivity through the provision of high-quality development and jobs assisting the local area to become a more sustainable place. The proposal therefore complies entirely with the relevant economic and employment policies and is considered to be acceptable in principle.

Design, Appearance and Heritage

- 6.21 The NPPF highlights the importance of creating high quality buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.22 Local Plan Policy LP24 (Design) states that good design should be at the core of all proposals. Development should have regard to the form, scale, layout and details to ensure it respects and enhances the character of the townscape, heritage assets and landscape. Extensions are required to be subservient to the original building, are in keeping with the existing buildings in terms of scale, materials and details and minimise impact on residential amenity of future and neighbouring occupiers.
- 6.23 Policy LP24 further outlines that the use of innovative construction materials and the incorporation of vegetation and tree planting to assist heating and cooling and considering the use of renewable energy will be supported.
- 6.24 Local Plan Policy LP24 (Design) requires development to consider form, scale and details of all development in the local area. Proposals should promote good design by ensuring the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape.
- 6.25 Local Plan Policy LP35 (Historic Environment) outlines that any proposal affecting a designated heritage asset should preserve or enhance the significance of the asset. In cases likely to result in substantial harm or loss, development will only be permitted where it can be demonstrated that the proposals would bring substantial public benefits that clearly outweigh the harm.
- 6.26 The policy further states that proposals which would remove, harm or undermine the significance of a non-designated heritage asset, or its contribution to the character of a place will be permitted only where benefits of the development outweigh the harm having regard to the scale of the harm and the significance of the heritage asset. Proposals should retain those elements of the historic environment which contribute to the distinct identity of the Kirklees area.
- 6.27 Following useful pre-application discussions with the Council, amendments have been made to the design of the proposed development. These changes include:
- Increased use of stone materials
 - Inclusion of stone parapets
 - Simplified glazing
 - Disabled and EV parking provision have been provided
 - Additional tree planting and landscaping
- 6.28 In terms of building height, the roof level would reach a height of 8.7m, over 3.3m less than the height of the neighbouring property, Phoenix Mills, to the east. Furthermore, the proposed development

would be 2.5m lower in height than the neighbouring unit at the site occupied by DFS. Most significantly, the roof level of the proposed development would be over 7.6m lower in height than the chimney level height of the neighbouring Listed Building to the south. Therefore, in terms of building height and scale, the proposed development would not result in adverse visual impacts to existing buildings surrounding the site which are consistently taller than the proposed development.

- 6.29 Furthermore, the comments from the pre-application discussions on the material design of the proposed development and its relationship with the surrounding area have been acknowledged and the design has been amended. Accordingly, the proposed development comprises a high-quality appearance utilising a mix of stone brickwork, stone detailing, stone parapet and complimentary rendering to define the main façades to reflect the existing character and context of the site.
- 6.30 The eastern elevation is less visible and sensitive to the surrounding area and will be viewed against a predominantly industrial/commercial context. Therefore, this elevation continues the use of stone and render but includes stone coloured cladding in order to respond to the modern DFS and Storage King building opposite whilst remain in-keeping with the wider materials found in the local context. The cladding and protruding bands continue the rhythm established on the western elevation whilst also providing for the internal functionality required for a storage unit.
- 6.31 In turn, the proposed development would complement both the neighbouring Listed Building design to the south, as well as surrounding industrial units within a wider commercial and industrial area.
- 6.32 New planting is proposed within the existing car park and at the site's frontage to help soften the built form of the proposed extension and create further visual interest at the site.
- 6.33 A Built Heritage Statement has been prepared and submitted with this application in consideration of the adjacent Grade II Listed Building. The Heritage Statement concludes that the proposed new building is considered to be sympathetic response to the Listed Building as follows:
- Historic photographs show a building at the front westerly edge of the Site of a similar height and proportion as that proposed.
 - The new building will re-establish the historic building line.
 - The glazed corner feature adds a modern dimension to the building which helps distinguish it from the historic buildings. It also breaks up the uniformity of the elevations which means the Listed Building and the pavilion are not read as one, again affording the Listed Building more prominence.
 - The smaller scale branding is in keeping with the comparable branding on the surrounding buildings including DFS and the BMW dealership.
 - This area, and specifically the setting of the Listed Building, have historically had an industrial and commercial use. This is reflected in the overall design of the proposed development.
- 6.34 In summary, the proposed design of the new building is sympathetic to the height and proportions of the Listed Building. It has been designed so it does not compete with the architectural interest of the Listed Building but also to be in keeping with the existing modern buildings in the area.
- 6.35 For many years, self storage businesses have employed the practice of inserting dismantlable mezzanine floors into their completed storage units in order to maximise the available storage space. The accepted approach is that the applicant does not apply for planning permission for the mezzanine floors themselves but instead applies for planning permission for the construction of the storage building and the permanent/fixed floors.
- 6.36 The dismantlable mezzanine floors are inserted after practical completion of the storage building. Whilst planning permission will not be sought for the mezzanine floors, they will be shown on the submitted drawings and marked for illustrative purposes to enable full assessment of the likely impact of the development, taking into consideration the maximum potential floorspace.

- 6.37 The proposed development is considered to cause no harm to the significance of the Listed Building and the design of the building has a positive relationship with the surrounding area. Therefore, the proposed development is compliant with the relevant design and heritage planning policies.

Parking and Access

- 6.38 Local Plan Policy LP20 (Sustainable Travel) supports development that reduces the need to travel. The Council will support development proposals that can be served by alternative modes of transport such as public transport, cycling and walking and provide measures to encourage the use of sustainable travel options.
- 6.39 Local Plan Policy LP21 (Highways and Access) permits development where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe. Applications will need to be accompanied by a supporting Transport Assessment or Transport Statement where the development would generate significant trip generation, providing detail as to the impact on highway safety, air quality, noise and light restrictions.
- 6.40 Local Plan Policy LP22 (Parking) requires the provision of parking to be based on the availability of public transport, the accessibility of the site, location of the development, local car ownership levels and the type, mix and use of the development. Provision will also need to be made for cycle parking and disabled parking.
- 6.41 The Kirklees Highway Design Guide Supplementary Planning Document identifies that the Council have not set any local parking standards for non-residential development. However, applications should demonstrate how the design and amount of parking proposed is the most efficient use of land within the development in the context of encouraging sustainable travel in conjunction with soft landscaping.
- 6.42 As part of the pre-application written advice, officer's had reservations as to whether a sufficient level of parking would be retained as a result of the development. Therefore, a Parking Provision and Demand Note was prepared and has been submitted as part of this application.
- 6.43 The submitted Parking Provision and Demand Note demonstrates that reducing the car parking spaces to account for the proposed development would have little effect on car parking stress and that overall, there would be enough spare capacity at the site to accommodate for the development proposals. Therefore, the reduction in car parking to 65 spaces is feasible and will still ensure all car parking demand from the site can be contained within the site in accordance with Local Plan Policy LP21 and 22.
- 6.44 A Transport Statement has been prepared by RPS and is submitted in support of this application. The Transport Statement states that self storage facilities do not generate vehicles or the levels of parking demand as you would expect from traditional B8 uses. This is because users of self storage are on-site for a short time and generally the arrivals and departures are spread across a day. For these reasons, a reduction in car parking spaces from 102 to 65 overall parking spaces is proposed within the main car park.
- 6.45 The proposed development will improve the existing 8 cycle parking spaces through the addition of a shelter over the spaces, in accordance with the expected levels demand and a total of 5 disabled parking bays to accommodate a range of people's needs in accordance with Local Plan Policy LP22. The proposed development includes the provision of 2 EV charging points.
- 6.46 It is proposed that the vehicle access strategy will remain the same for the proposed development with the existing vehicular and pedestrian accesses being retained. The new building will also have a separate loading area for cars and small vans to load/unload goods to/from the self-storage units. This will only be for the proposed self-storage building with the existing building still maintaining servicing from the rear of the site.

6.47 Visibility splays have been assessed and all access points can provide the required driver visibility splays as set out in Manual for Streets (MfS). This is demonstrated in more detail, along with the submitted Swept Path Analysis, within Appendix 5 of the submitted Transport Statement.

6.48 Therefore, the proposed development is compliant with the relevant transport and highways planning policies.

Neighbouring Amenity

6.49 Local Plan Policy LP51 (Protection and Improvement of Local Air Quality) requires development to demonstrate that it is not likely to result, directly or indirectly, in an increase in air pollution which would have an unacceptable impact on the natural and built environment or to people.

6.50 Local Plan Policy LP52 (Protection and Improvement of Environment Quality) resists development that has the potential to increase pollution from noise, vibration, light, dust, odour, shadow flicker, chemicals and other forms of pollution unless mitigation measures are proposed. Such developments which cannot incorporate suitable and sustainable mitigation measures which reduce pollution levels to an acceptable level to protect the quality of life and well-being of people or protect the environment will not be permitted. Where possible, all new development should improve the existing environment.

6.51 There are no residential properties within close proximity to the site that will be affected by the proposed development. Given the proposed development is of a similar scale than the surrounding buildings and is smaller than the main existing building and utilises the change in levels from Leeds Road, there will be no impact on the amenity of the surrounding area.

6.52 The proposed landscaping at the site will soften the built form and provide a more natural element, providing an enhanced visual appearance compared to the existing car park.

6.53 The pre-application advice confirmed that as the surrounding site area strongly comprised commercial and industrial uses, neighbours would not be unduly affected by vehicle movements or other sources of disturbance.

6.54 It is considered that the proposed development will have no impact on neighbouring employment uses and is therefore compliant with the Council's planning policies.

Energy and Sustainability

6.55 NPPF Paragraph 154 outlines that new development should be planned for in ways that: avoid increased vulnerability to the range of impacts arising from climate change; and can help to reduce greenhouse gas emissions, such as through its location, orientation and design.

6.56 NPPF Paragraph 157 sets out that Local Planning Authorities should expect new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

6.57 Kirklees Council's Planning Applications Climate Change Guidance SPD (2021) details that development should consider the opportunity incorporate on-site renewable and low-carbon technologies, such as solar panels, in accordance with Local Plan Policies LP24 (Design) and LP26 (Renewable and Low Carbon Energy)

6.58 Accordingly, the proposed design option will incorporate solar panels on the roof, providing a source of renewable energy and improving the sustainability of the proposed development.

6.59 The proposal recognises and adopts sustainable development principles and the submitted Energy Statement demonstrates how the maximum feasible reduction in carbon emissions has been achieved and waste minimised. The Energy Statement details that: passive and active design measures have been taken; building fabric performance has been enhanced; high efficiency LED lighting with PIR sensors is proposed; the proposed development is not conditioned; and, the proposed PV array will be 88 kWp.

Flood Risk and Drainage

- 6.60 Local Plan Policy LP27 (Flood Risk) requires development to be directed to areas at the lowest probability of flooding, following a sequential risk based approach.
- 6.61 Local Plan Policy LP28 (Drainage) outlines that development on brownfield sites should provide a minimum 30% reduction in surface water run-off with a presumption for SuDS to be used and implemented.
- 6.62 The pre-application advice noted that the site was situated within Flood Zone 2 and 3a within the Council's Strategic Flood Risk Assessment. However, the EA's flood risk map identifies the site as within Flood Zone 1. Therefore, RPS has undertaken a review of the Kirklees Strategic Flood Risk Assessment Information.
- 6.63 The Kirklees Strategic Flood Risk Assessment (KSFRA) (2016) notes that the February 2016 version of the Environment Agency Flood Map for Planning was used to inform flood risk within Kirklees. It is assumed that model information utilised within the production of the 2016 KC SFRA mapping once demonstrated the site to be located within Flood Zone 2 and 3. However, further model refinement that has since taken place now demonstrates flooding to be less spatially extensive and more tightly constrained to lower elevations closer to the River Colne.
- 6.64 Due to the age of the KC SFRA report and associated mapping, data from this source is assessed to be superseded by EA data which is updated on a quarterly basis and features modelling results from more recently updated modelling studies than those features within the KC SFRA. The site is therefore assessed to be located within Flood Zone 1 and has a 'low' risk of fluvial flooding.
- 6.65 In addition, the Updated Flood Risk from Surface Water mapping shows the site predominantly has a 'very low' risk of surface water flooding, with a 'low' risk of flooding from a surface water flow pathway following local topography. Flows are conveyed off-site to the east along the perimeter of the existing buildings and presents flood depths up to 300mm and flow velocities of over 0.25m/s.
- 6.66 On the basis that the proposed use of the development is classified as 'Less Vulnerable' within the Planning Practice Guidance, the proposals are considered to be appropriate within Flood Zone 1 without the requirement to apply the Exception Test.
- 6.67 As detailed in the submitted Flood Risk Assessment and Drainage Strategy, the Drainage Hierarchy within national Planning Policy Guidance and the use of Sustainable Drainage Systems (SuDS) has been considered against the specific constraints of the site. Accordingly, surface water flows from the development are to be attenuated underground within an oversized pipe the site and discharged at a restricted run-off rate to a YW combined sewer within Grove Road. As a result of the proposed measures, a 30% betterment of existing flows will be applied, and therefore, surface water flood risk within the local area will be reduced.
- 6.68 For the reasons listed above, the proposals are considered acceptable in terms of flood risk and the drainage strategy.

Landscaping and Ecology

- 6.69 Local Plan Policy LP30 (Biodiversity and Geodiversity) seeks to protect and enhance the biodiversity and geodiversity of Kirklees. The Council require development to minimise the impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist.
- 6.70 Local Plan Policy LP31 (Strategic Green Infrastructure Network) prioritises the safeguarding and enhancing of green infrastructure networks and green infrastructure assets within identified Strategic Green Infrastructure Network. Development will be required to provide new or enhanced green infrastructure where appropriate, including street trees.

PLANNING STATEMENT

- 6.71 Local Plan Policy LP33 (Trees) resists proposals that result in the direct or indirect loss of trees of significant amenity. Proposals should retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment, including the Green Infrastructure Networks.
- 6.72 Local Plan Policy LP52 (Protection and Improvement of Environment Quality) supports applications that do not have unacceptable impacts on the environment.
- 6.73 The site is located within a designated 'Biodiversity Opportunity Area' and 'Existing Strategic Green Infrastructure Network'.
- 6.74 The submitted Arboricultural Impact Assessment details that 4 individual trees have been identified as requiring removal. The trees are considered as two category A (T2 and T3) and two category C (T4 and T9), when using the BS categorisation method. The reason for the removal of a category A tree is the impacts of the development. These trees will be replaced as part of the site's Landscaping Strategy.
- 6.75 As detailed within the submitted Landscape Strategy, a total of 11 new trees are proposed, in addition to new hedge and shrub planting within the car park and at the site frontage, pursuant to the advice given by the Council during pre-application discussions.
- 6.76 A Biodiversity Net Gain (BNG) Assessment has been prepared and submitted to support this application. The BNG assessment indicates that the proposed development will deliver a net gain of +15.09% for habitats and +100.00% for hedgerows.
- 6.77 This score is above the standard target of 10% and demonstrates that the development is proposed to provide a biodiverse, ecologically valuable site that will benefit a wide range of species. Therefore, the proposed landscaping features should comply with local requirements.

7 CONCLUSIONS

- 7.1. MJM Acquisitions Ltd, trading as Storage King, have submitted a full planning application to Kirklees Metropolitan Council seeking to expand their existing operations at their premises in Huddersfield, located at Storage King, Phoenix Retail Park, Leeds Road, Huddersfield, HD1 6NE.
- 7.2. There is a business need to expand the existing unit and alter the layout of the site to meet the operational needs of the existing self storage unit. The proposed development seeks to increase the self storage capacity at the site through the erection of a rear extension of the unit (B8 use).
- 7.3. The proposed development comprises a new building (Use Class B8) to be located at the front of the existing site, towards Leeds Road, which provides an extension of the existing self storage facility's use. The proposed development includes a fixed floor area of 960sqm (GIA), as well as two mezzanine floor levels with a total floorspace area of 1,920sqm (GIA).
- 7.4. The proposals for development have been the subject of pre-application discussions with the Council. The scheme comprising this planning application has been developed to respond to the comments received.
- 7.5. The Council suggested that the proposals could be supported in principle subject to a number of considerations, including matters of highway safety, flooding risk and drainage. Accordingly, these issues have been considered in detail within this Statement and are summarised below.
- 7.6. As outlined within the submitted Design and Access Statement, the proposed development comprises a high-quality appearance, utilising a mix of stone brickwork, stone detailing and complimentary coloured rendering to define the façade in order to respect the local context and neighbouring heritage asset.
- 7.7. The submitted Transport Statement details that the proposal includes the retention of 65 of the existing car parking spaces (of which 5 are disabled parking spaces) and the installation of EV charging points for two of the existing car parking spaces. The cycle parking spaces are proposed to be covered by a new shelter at the entrance of the existing building, providing a total provision of 8 covered cycle spaces. The vehicular access points from Grove Road and Learoyd Street remain the same and provide access to the car parking spaces and new loading bay.
- 7.8. In addition, the proposal recognises and adopts sustainable development principles and the submitted Energy Statement demonstrates how the maximum feasible reduction in carbon emissions has been achieved and waste minimised. The Energy Statement details that passive and active design measures have been taken; building fabric performance has been enhanced; high efficiency LED lighting with PIR sensors is proposed; and the proposed PV array will be 88 kWp.
- 7.9. As detailed in the submitted Flood Risk Assessment and Drainage Strategy, the Drainage Hierarchy within national Planning Policy Guidance and the use of Sustainable Drainage Systems (SuDS) has been considered against the specific constraints of the site. Accordingly, surface water flows from the development are to be attenuated underground within an oversized pipe the site and discharged at a restricted run-off rate to a YW combined sewer within Grove Road. As a result of the proposed measures, a 30% betterment of existing flows will be applied, and therefore, surface water flood risk within the local area will be reduced.
- 7.10. As detailed within the submitted Landscape Strategy, a total of 11 trees will be plants, as well as additional hedges and shrubs to be planted within the car park and at the site frontage in order to replace the 4 trees lost, create new habitats and provide a BNG of 15% for habitats and +100.00% for hedgerows.
- 7.11. On balance, the proposals are deemed to be acceptable and in accordance with relevant Development Plan policies. Therefore, planning permission should be granted.