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SUPPORTING PLANNING STATEMENT

Town and Country Planning Act 1990

Planning and Compulsory Purchase Act 2004

Localism Act 2011

Change of Use of Car Park to Car Park/Outside Storage Area, Construction of Fencing and Landscaping

Land at Earlplace Business Park, Fletchamstead Highway, Coventry

On Behalf Of: Avon Capital Estates1 LLP

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1.0 INTRODUCTION

- 1.1 This Supporting Planning Statement (~~%SPS+~~) has been prepared by Harris Lamb Planning Consultancy (~~%HLPC+~~) on behalf of Avon Capital Estates 1 LLP (~~%the Applicant+~~). It supports a planning application proposing the change of use of part of the car parking area associated with the Earlplace Business Park (~~%the Application Site+~~) to an area of car-parking with designated areas for the storage of goods. In addition, a barrier fence is proposed in order to enclose the section of the site that will be the subject of storage alongside additional landscaping.
- 1.2 Whilst the Application Site is not currently used for storage there has been a history of the storage of goods on the site. In addition, there is an extant planning permission that allows for the storage of goods on the western most part of the application site subject to the provision of a 3.5 metre barrier fence (Application Reference No: FUL/2017/0542).
- 1.3 The aforementioned planning permission has not been implemented as it was designed to secure storage to serve Unit B~~3~~ former tenants, Innovare. Due to the length of time it took to secure planning permission Innovare decided to vacate the premises and seek alternative accommodation elsewhere. The principle of the proposed development is broadly similar to that secured by planning permission FUL/2017/0542 albeit the screening arrangements are altered and the areas of storage proposed in an alternative location.
- 1.4 The purpose of the planning application is to assist with the letting of the buildings on site. If a reasonable amount of open storage is not provided the units will remain uncompetitive in the modern market and there is a risk they will remain vacant. The Applicants are the owners of the Earlplace Business Park. It has proved difficult to attract B Use Class tenants to the site due to the absence of storage opportunities in the yard area external to the premises. The buildings on site are of a size and nature that external storage is expected by modern occupiers. As a consequence it has proved difficult to attract tenants and partly due to this reason planning permission has been granted

for the change of use of properties on the estate to alternative uses (such as a trampoline centre and a gym), following evidence being provided of the difficulty in attracting B Use Class operators.

1.5 On this matter, it should be noted that HLPC's Agency team advise on Earlplace and numerous similar industrial estates across Coventry and in the West Midlands generally. HLPC's Agency team have advised the Applicants that occupiers expect outside storage with the units of this size and type and it is commonly provided in other similar estates across Coventry.

1.6 This SPS has been prepared in order to explain why planning permission should be granted. The SPS has been structured on the following basis:

- **Chapter 2 – Site Description:** A description of the Application Site and a brief description of the activities that have taken place on the site during recent times is provided.
- **Chapter 3 – Description of the Proposed Development:** A description of the development proposed is provided.
- **Chapter 4 – Background and Planning History:** The Application Site's planning history relevant to the development is confirmed.
- **Chapter 5 – Normal Working Practices:** We provide an overview of how open storage normally functions in conjunction with premises of this size. We do so by way of examples of similar sites in Coventry.
- **Chapter 6 – Planning Policy Review:** An overview of relevant national and Local Planning policies is provided.
- **Chapter 7 – Analysis:** It is explained why the proposed development is Development Plan compliant and a series of significant material considerations are identified that support the grant of planning permission.
- **Chapter 8 – Car Parking Arrangements:** The impact that the proposed development will have on car parking arrangements is confirmed.
- **Chapter 9 – Conclusions:** Conclusions are drawn regarding the suitability of the proposed development.

2.0 SITE DESCRIPTION

2.1 The Application Site comprises an irregular shaped parcel of land extending to approximately 1.79 hectares. It includes Units A and B, of the Earplace Business Park and their associated areas of car-parking and access. Whilst no changes are proposed to Units A and B, they have been included within the application area given that the existing car parking and proposed storage areas are associated with these units. The Application Site also includes the areas of landscaping associated with these units.

2.2 Unit A is located towards the northern edge of the Application Site. It provides a total of 5,301 sq. m. of floorspace. Unit B is located on the southern edge of the Application Site. It provides 3,700 sq. m. of floorspace. A total of 163 car parking spaces are provided to serve these units. A total of 8 car parking spaces were lost as a consequence of a recent planning permission (ref FUL/2019/0799) for the installation of *'3 no. 4000 litre LPG tanks, with 1.8m close boarded fencing and 900mm safety barriers'* outside Units A2 and A3. Planning permission was granted on 23/5/2019. This will therefore reduce the number of car parking spaces from 171 to 163. The existing car-parking arrangements and the location of the buildings and the LPG tanks are shown on application plan ref: A1785-JSA-L02.

2.3 The site is served by a central access road extending from the Fletchamstead Highway (A45) to the east. There is a green landscaping strip around the edge of the site separating it from the properties to the north, south and east.

2.4 The site is in a mixed-use area. The land to the east of the Application Site comprises units C and D of the Earplace Industrial Estate. Unit C is used as a gym and Unit D for B Class employment purposes. A car showroom (Jaguar) lies immediately to the north-east of the Application Site. Further north is the A45 beyond which is a series of employment and retail based uses including a large Sainsbury's and a series of large commercial premises.

2.5 To the immediate north of the Application Site are a series of residential properties and a car dealership facing on to Standard Avenue. Further north

are further car dealerships, including Hyundai and Audi. In addition there is an area of playing fields and an area of public open space in the location. The land to the immediate west of this site is predominantly residential in nature with the rear gardens of properties off Eastcoats backing on to the site boundary. The southern boundary of the site abuts a row of residential development accessed off Kineton Avenue. Further south is a large Costco retail unit and other employment uses.

- 2.6 The various land uses in the locality have operated successfully next to each other for a significant period of time.

3.0 THE PROPOSED DEVELOPMENT

3.1 There are effectively three separate elements to the proposed development as detailed below.

1. Change of Use of Parts of the Car-Parking Area to Storage

3.2 Planning permission is sought to change three areas of car-parking to storage and distribution use. The three proposed storage areas are identified in application plan ref: A1785-JSA-L02. Area A(I) is located adjacent to Unit A approximately half-way along its length. Area A (II) is located adjacent to the eastern edge of Unit A. Storage area B is located immediately to the north of Unit B. At the present time a total of 163 car-parking spaces are available within the Application Site. This will be reduced to 145 car-parking spaces as a consequence of the proposed development.

3.3 A maximum storage height of 3.5 m. is proposed in storage areas A(I) and area B. A maximum storage height of 2 m. is proposed in area A(II). The storage height can be controlled by way of condition. The low-level storage height means that the stored material will be significantly lower height than the surrounding buildings and other structures within the site.

2. The Fencing

3.4 During the course of previous pre-application discussions regarding development within the Application Site, it was advised by Officers that a barrier fence is required to screen views of the storage yard areas from the entrance of the Estate. As a consequence this planning application proposes the development of fencing to enclose the parts of the Application Site where storage is proposed. The proposed fence will be the same height as the proposed height restriction on storage as detailed above and be of solid board construction. The height of the fence will ensure that the storage area is obscured from view from the road.

- 3.5 In order to demonstrate the visual impact of the storage and fencing the planning application is accompanied by a series of photo montages and an LVIA. The photo montages demonstrate that views into the site are highly limited and the impact of a proposed development is negligible.

3. Planting Area

- 3.6 The western part of the site forms an embankment that separates the site from the residential area to the west. Previously Officers have not requested that any works undertaken in this area are through the pre-application or application determination process. The Applicants are, however, proposing to provide additional planting in this area as part of the development. The planting is shown on Landscape Strategy Plans L8186/01, Landscape Detailed Design Plan L8186/02 and the Landscape Specific Schedule and Photo Montage Plan L8186/03. The proposed landscaping area will help restrict views into the yard area from the rear gardens of the properties to the west. Whilst there is already some planting in this area, additional screening will help to improve the situation by further restricting views.
- 3.7 In terms of hours of operation there is no restriction in place on the hours of operation within the commercial units at the present time. In order to better control noise a series of recommendations are included in the accompanying noise report. These do not require restriction of hours of operation of the buildings. A series of measures are proposed to ensure that there are no adverse amenity impacts due to the activities in the yard area. The Applicants suggest that these are controlled by condition. Permission is sought to use the yard area between 7.00 a.m. and 7.00 p.m. subject to mitigation measures identified within the noise report being put in place.

4.0 BACKGROUND AND PLANNING HISTORY

- 4.1 On 24 November 2000 Coventry City Council granted planning permission 23396/U . Unit A2, A3 and B . Earlplace Business Park. Planning permission was granted for the change of use of the existing building and the erection of a new building for storage and distribution of goods, pick and pack sorting and assembly of goods, shredding of documents, together with associated headquarters, offices and ancillary service road, parking surfaced areas and minor changes to the elevations of the existing building. Condition 9 of the permission restricted the use of the building to B8 storage and distribution, for the uses identified above, or for a use with class B2 of the Town & Country Planning Act.
- 4.2 Condition 5 of the permission advised that no storage should take place in the open in any part of the site. In addition, condition 10 advised that no goods of any description should be kept, stored, offered or displayed for sale, lease, or rental outside of the building subject to this permission.
- 4.3 On 2 April 2003 planning permission 23396X was granted by the City Council. This permission allowed for Unit B to continue to be used for class B2 purposes and, also, for the unit to be used for class B1(b) and B8 without restriction. Condition 4 of this permission prevents storage taking place in the open on any part of the site. Condition 8 of the permission prevents goods of any description being kept, stored, sold, offered or displayed for sale, hire, lease or rental outside of the building.
- 4.4 The previous occupier of Unit B, Innovare Systems operated successfully out of Unit B under these planning permissions for approximately eight-years. However, in 2015 a neighbouring resident made a complaint regarding noise. Officers drew to the attention of the Innovare that there was a restriction on storage in the yard area. In response, a planning application was submitted to the Council that sought permission to store goods externally at Unit B.

- 4.5 On 6 April 2016, the Council granted planning permission FUL/2016/0369. The planning permission granted temporary consent for the carpark to be used as a carpark and outside storage use until 31 December 2017. The use of the storage area should be undertaken in accordance with best practice and mitigation, outlined in the Noise & Management Plan 15-0151-0R02 submitted with the application. This is controlled by condition.
- 4.6 The Officer's Report for planning permission FUL/2016/0369 advises that there were three main issues relevant to the determination of the planning application: -
- i. visual appearance;
 - ii. loss of parking; and
 - iii. impact upon residential amenity.
- 4.7 The Officer's Report confirms that:
- The highways department did not object to the reduction in carparking spaces or the application generally.
 - The issue of noise disturbance associated with the movements of materials/goods was addressed through the submitted Noise & Management Plan.
 - In terms of visual impact, it is advised that the estate has a '*relatively high quality tidy appearance*' and is located off a major road. The addition of significant areas of outside storage of timber would detract from its appearance will not be acceptable on a permanent basis. However, the visual impact for a temporary period extending to the end of the year would not cause serious harm or warrant refusal of the application on its own right.

- 4.8 It is noteworthy there were only two objections to this application. Both objections received from the local residents who were concerned about noise. No concern was expressed about the visual appearance of the estate by any local resident or third party. This clearly suggested that the visual appearance of the estate is not a particularly sensitive issue for local residents or people passing the estate.
- 4.9 On this matter, it should be noted that Innovare Systems operated out of Unit B for approximately 10 years. There were no concerns expressed to the Council's Environmental Health Department, or any other department, from the estate's tenants, local residents, or any other party during Innovare Systems's operation of the site. This clearly suggests that the visual sensitivity of the site is highly limited.
- 4.10 Innovare Systems were unable to operate from Earplace without some provision for outside storage. In order to make the storage solution permanent a planning application (FUL/2017/0542) was submitted to the Council proposing the change of use the carpark to carpark/outside storage area and the construction of a 3.5m barrier fence and landscaping. Planning permission was granted for the development on 28 April 2017. Unfortunately due to the length of time it took to progress through the pre-application process and for the application to be determined, Innovare decided to vacate the premises and to find alternative accommodation outside of Coventry. Condition 3 of the permission required the outside storage to take place in accordance with the plans submitted with the application. Condition 4 prevented the removal or movement of materials or finished products outside of the building before 07:00 and after 19:00 on any day. This was tailored to meet Innovare's requirements.
- 4.11 This planning permission had not been implemented and remains extant until 28 April 2020 and is fully capable of implementation. This planning permission demonstrates that a permanent storage solution is appropriate at Earplace, subject to mitigation.

- 4.12 On 25/05/2019 planning permission ref FUL/2019/0799 was granted. This allows for the installation of 3 no. 4000 litre LPG tanks, with 1.8m close board fencing and 900mm safety barriers. As a consequence of this permission, the number of car parking spaces serving these units is reduced from 171 to 163 spaces.

5.0 NORMAL WORKING PRACTICES

- 5.1 It is unusual for yard areas to be screened in the way required by Officers. HLPC's Agency Team, who represent and work on a significant number of similar sites throughout the West Midlands, are unaware of any similar position being adopted by a local authority in terms of screening.
- 5.2 By way of an example Coventry City Council approved planning application FUL/2016/0232 . Unit 3 . Pilot Close on the 22nd of April 2016. This permission allows for the erection of a B1(c), B2 and B8 employment unit as part of the Pilot Business Park development. This site can be seen from the Coventry Eastern By-Pass (A46) and is in close proximity to areas of residential development to the north west. There are no restrictions on open storage associated with this planning permission or screening despite its relationship to the highways network and the views of the site.
- 5.3 A similar situation exists on Lyons Park, Coventry. The Lyons Park development is a speculative build of five units ranging from 30,000 sq. ft. to 50,000 sq. ft. The site can easily be viewed from the surrounding road network including the roads associated with the residential area to the west accessed off Browns Lane. There is no restriction of any sort on outside storage associated with the site despite its location.
- 5.4 The requirement for the yard area to be screened is, therefore, an unusual position for the City Council to adopt. It is unclear why a different view has been reached about the sensitivity of the Earplace Business Park compared to the other locations. There is a clear precedent for outside storage in Coventry's larger and prestige industrial estates to encourage occupation.

6.0 PLANNING POLICY

6.1 Planning applications should be determined in accordance with the requirements of the Development Plan, unless material considerations indicate otherwise. In this case the Development Plan comprises the Coventry City Local Plan (December 2017). Material planning considerations include the National Planning Policy Framework (NPPF). A summary of the relevant policies in the Development Plan and Framework are set-out below.

Coventry City Local Plan

6.2 The Coventry City Local Plan (***'the Local Plan'***), was adopted by the City Council on 6 December 2017. It is the principal Development Plan document relevant to the application site.

6.3 The application site is not subject to any particular policy designation by the Local Plan. It is, therefore, subject to the general policies in the Local Plan guiding development.

6.4 Policy DS1 . *'Overall Development Needs'*, advises significant levels of housing, employment and retail development will be planned for during the course of the plan period. A 'minimum' of 128 hectares of employment land will be provided within the City's administrative boundary. The policy's supporting text advises that the total employment requirement is for 369 hectares, however, there is an identified shortfall of 241 hectares that could not be met within City's administrative boundary and, instead, needs to be directed to neighbouring authority areas.

6.5 Policy DS3 . *'Sustainable Development Policy'*, advises that the Council will take a positive approach toward development proposals that reflect the presumption in favour of sustainable development contained within the Framework. It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible and to secure development that

improves the economic, social and environmental conditions in the area. This includes access to new jobs.

- 6.6 Policy JE1 . *'Overall Economy and Employment Strategy'*, advises that the Council will work proactively and positively with businesses in the City, inward investors and the City's two universities. The Council will promote the continued diversification of the City's economic base, particularly through supportive expansion of companies operating in growth sectors and partnership working with the universities. It will seek to ensure that job opportunities arising from employment development are accessible to all of the City's working age residents, particularly priority groups and those in the most deprived areas of the City. A range of readily available employment sites will be provided and existing employment sites will be safeguarded from being lost to non-employment uses, unless exceptional circumstances demonstrate it.
- 6.7 Policy JE3 . *'Non-Employment Uses on Employment Land'* seeks to protect existing employment sites for employment purposes. The policy's supporting text advises that it is important to ensure existing non-allocated employment sites are retained for employment use wherever possible.
- 6.8 Policy JE7 . *'Accessibility to Employment Opportunities'* advises that planning applications for new employment development will be required to demonstrate how job opportunities arising from the proposal is made accessible to the City's residents, particularly those from the most deprived areas of the City and priority groups. A range of measure are identified that applicants should give consideration to.
- 6.9 Policy D1 . *'Ensuring High Quality Design'* requires all development proposals to respect and enhance their surroundings and positively contribute toward the local identity and character of the area. They should provide an attractive, safe and uncluttered space.

The National Planning Policy Framework (NPPF)

- 6.10 The NPPF ('the Framework') was adopted in February 2019. The Framework sets-out the Government's planning policies for England and guidance on how they are expected to be applied. The introduction section to the Framework confirms that planning law requires applications for planning permission be determined in the accordance with the Development Plan, unless material considerations indicate otherwise. The Framework must be taken into account as a material consideration in planning decisions.
- 6.11 The Framework seeks to achieve sustainable development. Paragraph 8 of the Framework identifies three overarching objectives to sustainable development, which are interdependent and need to be pursued in mutually supportive ways. The three overarching objectives are:
- An economic objective . To help build a strong, responsive and competitive economy, by ensuring there is sufficient land of the right type is available in the right places and at the right times to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
 - A social objective . To support strong, vibrant and healthy communities, by ensuring there is a sufficient number of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, safe, built environment, with accessible services and open spaces that reflect current and future needs to support communities' health, social and cultural wellbeing; and
 - An environmental objective . To contribute to protecting and enhancing the built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, minimising and adapting to climate change and including moving to a low carbon economy.
- 6.12 These objectives should be delivered through the preparation and implementation of plans and the decision making process, but not a criteria against which every decision can, or should, be judged.

6.13 Plans and decisions should apply the presumption in favour of sustainable development. For decision-making this means: -

- approve development proposals that accord with an up-to-date Development Plan without delay; or
- where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out of date, grant planning permission unless;
 - i. the application of policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposal; or
 - ii. the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

6.14 The Framework requires local planning authorities to approach decisions on proposed developments in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, 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.

6.15 Part 6 . Building a Strong, Competitive Economy of the Framework requires planning policies and decisions to help create the conditions in which business 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

- 6.16 Planning policies and decisions should recognise and address the specific locational requirements of different sectors of the economy. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries and for storage and distribution operations, at a variety of scales in suitably accessible locations.
- 6.17 Section 12 . Achieving Well-designed Places of the Framework advises that the creation of high quality buildings and places is fundamental to what planning and development processes should achieve. 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. Planning policies and decisions should ensure the developments function well and add to the overall quality of the area and are visually attractive.

7.0 CASE FOR THE APPLICANT

7.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires when making a determination under the Planning Acts regard must be had to the Development Plan. The determination should be made in accordance with the Development Plan, unless material considerations indicate otherwise.

7.2 The adopted Coventry City Local Plan and the Framework identify a number of common policy considerations relevant to the determination of the planning application. Specifically, they provide strong support for sustainable economic development. They also require the delivery of good design and the protection of residential amenity. These are, in the Applicant's view, the key issues that require consideration in the determination of the planning application.

1 Encouraging economic growth

7.3 The Application Site is not identified for any particular purposes by the Local Plan Policies Map. However, the Local Plan confirms that the employment requirements of Coventry are significant. The Local Plan is unable to identify a sufficient quantum of employment land to meet the identified employment land requirements. Policy DS1 . *'Overall development needs'* identifies an employment requirement of 369 hectares. There is, however, only capaCity to provide 128 hectares of new employment land within the City's administrative boundary. As a consequence, the City Council is relying upon 241 hectares of employment land coming forward in neighbouring authorities to meet the City's growing need for job opportunities. This highlights the pressing need to deliver employment opportunities in Coventry.

7.4 Policy JE1 . *'Overall economy and employment strategy'* confirms the City Council will work positively and proactively with businesses to, amongst other things, support their retention and expansion. The policy specifically advises that the Council supports companies retaining, expanding and/or relocating their headquarters within the City.

- 7.5 Policy JE7 . requires planning applications for new employment development to demonstrate how job opportunities arising from those developments will be made accessible to the City's residents.
- 7.6 The guidance within the Local Plan is entirely consistent with the guidance of the Framework. The Framework is a pro-economic growth document. There are numerous references throughout the Framework to the Government supporting economic growth and an '*economic objective*' is one of the three overarching objectives of sustainable development identified by the Framework. As part of the economic objective plan-making and decision taking should help to build a strong, responsive and competitive economy, by ensuring sufficient land of the right type is available in the right place to support growth, innovation and improved productivity. In this regard the Applicant has identified a clear weakness their offering, that being the absence of the ability to store in the yard area, and have sought to address it.
- 7.7 The proposed development is entirely consistent with the policy objectives of the Local Plan and the Framework. The purpose of the planning application is to support the delivery of new employment uses at the Earlplace Business Park. The Earlplace Business Park has had significant difficulty in attracting new B-class employment operators, due to the lack of outside storage. As an example as a consequence of the problem, planning permission has been granted for the change of use of buildings on the Earlplace Business Park to non B-class employment uses following the City Council being satisfied that a pro-active marketing campaign has been unable to attract B use class operators. An example of this is planning permission FUL/2017/1935, where planning permission was granted to use Unit C as a trampoline centre and latterly a gym, following a lengthy marketing campaign.
- 7.8 Harris Lamb's agency team put the lack of interest in the units on the site down to the fact that it is not possible to store goods in the yard area. HLPC's agency team is one of the largest in the West Midlands and have advised on various sites throughout Coventry. It is, therefore, advised that modern occupiers expect the ability to be able to store goods externally and, as

detailed in Chapter 5 . '*Normal Working Practices*,' of this report that it is the norm for external storage to be allow on Coventry's industrial estates.

- 7.9 The fact that external storage is intricate to modern occupiers' needs is also demonstrated by the fact that Innovare, who operated out of Unit B, vacated the premises due to the amount of time it took to secure a previous planning permission that allowed external storage in the yard area (planning permission ref: FUL/2017/0542).
- 7.10 Planning permission FUL/2017/0542 does demonstrate that the Earplace Business Park is a suitable location for external storage, subject to appropriate mitigation. As such the principle of creating areas of storage in the yard area are not in dispute. The key matter for consideration is whether the mitigation proposed is sufficient to allow the external storage to take place.

2 Visual impact

- 7.11 The Local Plan and Framework contained guidance on good design. It is a common thread in the policies in the Local Plan and the guidance in the Framework that new development should positively contribute toward the character of the area and development should not diminish important views or sensitive areas. It is clear that the proposed areas of storage will not offend these policy objectives.
- 7.12 It has been established through the pre-application process and through the determination of planning application FUL/2017/0542 that the principal area of concern in relation to visual impact are the views of the proposed storage areas from Fletchamstead Highways to the east. In order to overcome these concerns, planning permission FUL/2016/0369 proposed the development of a visual screen connecting Units A & B to restrict views of the areas of storage. The approach of this application is to enclose the proposed areas of storage with a fence to similarly restrict such views. There are number of considerations in this regard.

- 7.13 First, the area of storage that will be closest the public highway is in excess of 60m from the nearest pavement. Views into the estate from this location are highly limited, due to the fact the estate has been developed in a terrace arrangement and the buildings in the central and eastern section of the estate limit views into the site. Whilst limited views of the proposed storage areas are available from the A45, these views are only possible when queuing takes place at the traffic lights, and vehicles are positioned in location to the immediate east of the estate entrance. We expect drivers of these vehicles to be looking ahead at the traffic lights, as opposed to looking into the estate.
- 7.14 Pedestrians passing the entrance of the site are also able to see into the estate, as are users of Simply Gym. However, the site is within a commercial area and individuals walking past the entrance to the site will also view the cars stored by Jaguar Land Rover and the largescale industrial buildings in the locality. Within the context of the surrounding area, the proposed storage will not be out of place.
- 7.15 The fact that the site is not particularly visually sensitive is clearly evidenced. At no point during the 10-years that Innovare Systems operated out of Unit B were there any complaints to the City Council, the Applicant or any other party that we are aware of regarding the storage externally. The Committee Report for the temporary storage planning permission FUL/2016/0369 confirmed no concerns were raised by neighbouring residents regarding the visual appearance of the storage. This is also true of the Committee Report for planning permission FUL/2017/0542 where there were no objections to the scheme from neighbouring residents or from the Council's Environmental Protection Department. The site is not a sensitive visual receptor.
- 7.16 The proposed development is supported by a LVIA and photomontages that demonstrate the impact of introducing storage will have on the local environment. The LVIA does not identify visual impact as being a constraint to the development subject to the mitigation identified in the form of the fences that will enclose the storage areas and the restrictions in height that are proposed.

7.17 It should also be noted that whilst officers have previously confirmed there is no requirement for any planting on the western edge of the estate, on the embankment, the Applicants are happy to provide planting. There are existing trees on the embankment to the west of the estate. These will be reinforced with additional tree planting in order to improve the appearance of the estate from the upper floors of the residential properties off Eascoats to the west of the estate.

7.18 In summary, there will in our view, be no visual harm caused by the proposed storage areas. Indeed, the proposed new storage areas will better regulate storage on the site and help clearly define how the open areas of the estate should work.

3 Residential Amenity

7.19 The planning application is accompanied by an Environmental Noise Report. The Environmental Noise Report confirms that, subject to the implementation of appropriate working practices, there will be no adverse impact on residential amenity by way of noise as a consequence of the proposed development. This is in accordance with the findings of the noise report and controls that will be put in place as part of the determination of planning permission FUL/2017/0542, where similar controls were put in place.

4 The Planning Balance

7.20 When undertaking the planning balance, it is necessary to weigh up the benefits of the proposed development against the adverse impacts having regard to adopted and emerging policy requirements, the requirements of the Framework and other material considerations. When undertaking this exercise, it is clear that the benefits of granting planning permission significantly outweigh the impacts.

7.21 The benefits of development include helping to create a functional planning permission that will facilitate the use of the units by B use class operators. The restriction put in place on open storage by the current planning

permission has resulted in one tenant, Innovare Systems, leaving the site. It is also HLPC's agency team's view that the restriction on outside storage significantly diminishes the interest of the site to occupiers, given that there are various other opportunities within Coventry and beyond where open storage is available.

- 7.22 There are no notable adverse impacts. The accompanying Environmental Noise Assessment confirms there will be no adverse impacts on residential amenity from noise impact. In terms of visual impact of the proposed development the LVIA demonstrates that storage can successfully take place in the yard area without an adverse visual impact. This is a 'normal situation' for an estate of this nature and is replicated throughout Coventry, including the recently approved Lyons Park and Pilot Close developments with similar relationships to the road network and residential properties as the application site. The proposed fencing will screen any views of storage from the east of the site, which is the only sensitive visual receptor identified by Council Officers. For reasons explained above, we are of the view that the site is not a sensitive visual receptor in any event. The proposed screening will, however, improve the appearance of the area generally.
- 7.23 Furthermore, new planting is proposed toward the western edge of the estate. This planting will screen views of the storage area from the residential properties to the west. This is of benefit to the proposed development.
- 7.24 The benefits of granting planning permission clearly outweigh any adverse impacts. The proposed development is Development Plan compliant. In accordance with requirements of the Framework and Local Plan policy DS3 . *Sustainable Development Policy*, there is an immediate presumption of favour of the grant of planning permission.

8.0 IMPACTS ON CARPARKING

- 8.1 The proposed layout plan submitted with the application demonstrates how 145 carparking spaces will be made available following delivery of the storage areas and the recent installation of the LPG tanks following the grant of permission ref FUL/2019/0799. Appendix 5 . '*Carparking and Cycle Parking Standards of New Development*' the Local Plan set-out proposed carparking standards. It is advised that one carparking space should be provided per 60m² of development for B1/B2 uses.
- 8.2 There is a total of 9,001m² of floor space available at the site. There should, therefore, be 150 carparking spaces associated with the proposed development. Whilst the provision of 145 car parking spaces falls slightly below the requirement set out in the car parking standards, we have calculated this using the requirement for B1/B2 . Light or General Industrial, which is therefore more stringent than the requirement for B8 uses. The site has the benefit of B8 planning permission as well as B2. It is therefore possible that part of the site would fall under the car parking standards for B8 use, which advises that one carparking space should be provided per 100m² of development for B8 uses. It is our view that the provision of 145 car parking spaces can be justified due to the sustainable location of the development. In addition, the site has good access to public transport opportunities. There is a bus stop located immediate the adjacent the site entrance serves by Nos 5,11, 11U, 18, 19, 42, 47 and 48 bus services. These bus services provide direct connections to Coventry City Centre and the wider area generally.

9.0 CONCLUSIONS

9.1 This SPS supports a planning application at Earlplace Business Park, proposing:

- The introduction of three new areas of storage associated with Units B and A.
- The construction of fencing enclosing the three proposed areas of storage.
- A new area of planting to the west of the application site in order help obscure views of the storage area and the parking area generally from the upper floors of the residential properties to the west of the site, located off Eastcoats.

9.2 The purpose of the planning application is to encourage the occupation of Unit A and B by B-class employment operators. The lack of storage available on-site has made it extremely difficult to attract B-use class operators to the estate. Indeed, the former tenants of Unit B, Innovare left the estate due to the fact that permanent planning permission for an external area of storage could not be secured in good time.

9.3 There are three key considerations in the determination of the planning application, as detailed below:

- Economic benefits . The adopted Local Plan and the Framework place significant weight on sustainable economic growth. The proposed development provides the opportunity to facilitate the creation of B-class job growth within Coventry. The proposed development is in direct conformity with these policy requirements.
- In addition, planning permission has previously been granted to convert Unit C from a B-use class to a trampoline centre and subsequently a gym, following Coventry City Council being satisfied there was market evidence and there was no interest in the property for B-class employment

purposes. It is the Applicant's view that this is due to the fact that there is currently a restriction on storage within the yard area.

- Visual Impact . During the course of determination of previous planning applications Officers expressed their desire to ensure the visual impact of any storage on the site was appropriate having regard to view into the site from the A45 Fletchamstead Highway. There have been no complaints about the appearance of the site from local residents for in excess of 10 years, but there has been external storage taking place on the estate during this time. Views into the storage area from the entrance are extremely limited, given the terrace arrangements of the estate and the fact the storage is below the height of the existing properties. The site is also within an established employment area and storage of the nature proposed is expected.
- The proposed areas will be enclosed behind close boarded fencing, in order to obscure the view of the storage area and to make sure the site has a tidy appearance. In order to demonstrate the impact of the introduction of the storage areas and the proposed mitigation, the application is accompanied by a LVIA. The LVIA demonstrates there are no adverse impacts associated with the storage of goods.

Noise impact

- 9.4 The planning application is accompanied by a Noise Report which demonstrates that, subject to appropriate restrictions which can be secured by way of condition, there will be no adverse impacts associated with the storage in the yard area. Planning permission has previously been granted for storage in the yard area of the estate, subject to similar restrictions and, therefore, it is not envisaged that this will be a contentious matter.
- 9.5 In summary, the benefits of granting planning permission significantly outweigh any adverse impacts. It, therefore, respectfully request the planning permission is granted.