

Planning Committee 19th November 2024
Report of the Head of Planning



Hinckley & Bosworth
Borough Council

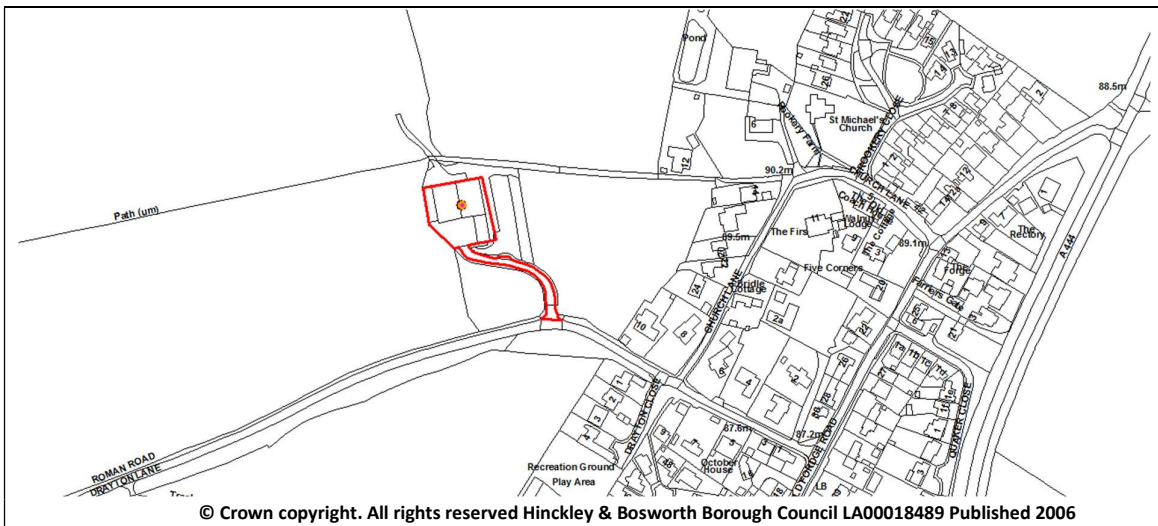
Planning Ref: 24/00627/CONDIT

Applicant: Mr P Simpson

Ward: Ambien

**Site: Extra Room Self Storage, Drayton Grange Farm, Drayton Lane, Fenny Drayton,
Nuneaton**

Proposal: Removal of condition 3 attached to planning permission 23/00239/FUL



1. Recommendations

1.1. Grant planning permission subject to

- Planning conditions outlined at the end of this report.

1.2. That the Head of Planning be given powers to determine the final detail on planning conditions.

2. Planning Application Description

2.1. This application seeks to remove condition 3 attached to planning permission ref: 23/00239/FUL which was for the extension to an existing self-storage unit (B8 Use: Storage and Distribution). The permission associated with 23/00239/FUL was for an extension on the eastern elevation of the self-storage facility with a proposed additional footprint of 926 sq. metres effectively mirroring the eastern elevation of the original building(s).

2.2. Application 23/00239/FUL was considered by HBBC planning committee on 6th June 2023 and was approved subject to conditions. Condition 3 limits the operating hours of the approved extension to the storage facility stating:

'The operating hours of the storage facility shall be limited to 05:00 to 23:00 Monday to Sunday with the reception hours being Monday to Friday 08.30 to 18.00 & Saturday 09.00 to 15.00 only.

Reason: To ensure there are no adverse impacts on the amenity of the occupiers of neighbouring properties and to ensure the visual amenity of the countryside to accord with Policies DM4 and DM10 of the Site Allocations and Development Management Policies DPD'.

- 2.3. The applicant is seeking to remove condition 3 to allow the business to operate 24 hours a day, every day. To date, the existing business has operated under voluntary access hours of 7am to 8pm, 7 days a week. The cover letter submitted with this application states that the self-storage industry in the UK is maturing and becoming more competitive. With this, the applicants consider that being able to offer 24/7 access is an important marketing tool as it gives storage customers peace of mind that they can access their things on the rare occasions that they really need to. The applicant states that 24/7 access also appeals to some businesses that use the storage for example, DJs, event organisers, mobile mechanics, some retailers etc and that 24/7 access could increase the size of the potential customer base the store will appeal to.
- 2.4. Planning permission 23/00239/FUL has not yet been implemented and the extension is not yet under construction. The applicant's submission states that the consent will not be implemented "whilst the unnecessary hours condition is attached". Any planning condition should meet the "6 tests" outlined in paragraph 56 of the NPPF, conditions should necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. It is the applicant's case that Condition 3 does not meet all of these tests and should therefore be removed.
- 2.5. A Lighting report and an Acoustic report have been submitted with this application. The submission also includes a Supporting Statement which includes a list of other local self-storage facilities and their opening hours and a summary of traffic data. Additional information was submitted by the applicant on 03/09/2024. This was in response to a number of questions the Council had regarding this application. The response to these questions are included in Appendix A of this report.

3. Description of the Site and Surrounding Area

- 3.1. The application site is located to the west of Fenny Drayton in the countryside. The area is agricultural in nature with the application site surrounded by fields on all sides. Extra Room Self Storage provides indoor storage for business customers and private individuals. The store provides a variety of different room sizes from 10 to 200 sq.ft dependent on the requirements of the customer. The site previously consisted of two agricultural buildings, which were converted into a self-storage facility in 2011 (application ref: 11/003331/COU).
- 3.2. In 2014, the two buildings were linked, so both could make use of the lift situated in the larger building under planning application 14/01087/FUL. The building was then extended in 2016 due to high demand under application 15/00871/FUL.
- 3.3. The other consents listed above do not have restricted operating hours, with the condition solely relating to the extension approved under the latest application 23/00239/FUL.
- 3.4. The site is accessed using a concrete driveway from Church Lane which is secured by an electric gate. The buildings are situated some 120 metres away from the nearest residential property on Drayton Lane with slightly longer distances to other

residential properties along Church Lane. The nearest major conurbations are Hinckley, Bosworth and Nuneaton (all 5 miles away).

- 3.5. The site area of the approved extension is 0.3536 ha. The site is approximately 1.75m lower than the eastern boundary which is defined by a planted buffer of evergreen and deciduous trees approximately 15m wide. The northern boundary is defined by a post and wire fence and evergreen tree planting. Immediately beyond the boundary a public right of way passes the site connecting Fenny Drayton in the east to Witherley in the west. Immediately to the north of the footpath is a mature well maintained native hedge approximately 2m high.

4. Relevant Planning History

05/01260/CONDIT

- CHANGE OF USE OF FARM BUILDINGS TO SELF STORAGE AND CARAVAN STORAGE WITHOUT COMPLIANCE OF CONDITION 4 OF PLANNING PERMISSIONS 05/00288/COU AND 05/00757/COU WHICH REFER TO THE LEASE, SALE AND DISPOSAL OF THE SITE
- PER
- 18.01.2006

06/01226/FUL

- EXTENSION AND ALTERATIONS TO STORAGE BUILDING
- REF
- 21.12.2006

08/00278/GDO

- ERECTION OF AN AGRICULTURAL STORAGE BUILDING
- GDO
- 14.04.2008

08/01100/FUL

- ERECTION OF GRAIN STORE
- PER
- 14.01.2009

11/00331/COU

- CHANGE OF USE OF REDUNDANT AGRICULTURAL BUILDINGS TO SELF STORAGE ACCOMMODATION INCLUDING ALTERATIONS TO THE EXTERIOR OF THE BUILDINGS.
- PER
- 04.07.2011

12/00285/CONDIT

- VARIATION OF CONDITION 3 OF PLANNING PERMISSION 11/00331/COU
- PER
- 06.06.2012

14/01087/FUL

- Link extension to storage unit
- PER
- 23.12.2014

15/00871/FUL

- Extension of a storage unit
- PER
- 02.10.2015

23/00239/FUL

- Proposed extension to self-storage unit (B8 Use: Storage and Distribution)
- PER
- 09.06.2023

5. Publicity

5.1. The application has been publicised by sending out letters to local residents. A site notice was also posted within the vicinity of the site. 14 representations have been received, all objecting to the proposal. The main summarised points of objection are:

- A 24/7 operation would be detrimental to wildlife habitats
- Increase in carbon emissions from more cars
- Impact on traffic and congestion leading to more noise and congestion
- Impact on well-being and mental health of residents from extra noise, additional light, broken sleep patterns
- Opening times require shortening
- The village cannot take more traffic and certainly does not need this traffic coming through 24/7 to access the storage units
- More traffic at unusual times opens up the village to targeted crime at night.
- Surely with a bit of planning The Grange Farm site has plenty of capacity to house the odd people that require 24 hour a day access. This location affects no neighbours.
- The reasons for which the original conditions were imposed have not changed

6. Consultation

6.1. No objections have been received from:

- HBBC Environmental Services (Drainage)
- LCC Highways - No comments to make in these site specific circumstances
- HBBC Environmental Pollution Officer - No objection
- HBBC Waste - No comments
- HBBC Regeneration Officer - No comments received
- Witherley Parish Council - No comments received

7. Policy

7.1. Core Strategy (2009)

- None applicable

7.2. Site Allocations and Development Management Policies DPD (2016)

- Policy DM1: Presumption in Favour of Sustainable Development
- Policy DM4: Safeguarding the Countryside and Settlement Separation
- Policy DM10: Development and Design
- Policy DM17: Highways and Transportation
- Policy DM18: Vehicle Parking Standards

7.3. National Planning Policies and Guidance

- National Planning Policy Framework (NPPF) (2023)
- Planning Practice Guidance (PPG)

7.4. Other relevant guidance

- Good Design Guide (2020)
- Leicestershire Highway Design Guide (LHDG)
- National Design Guide (2019)

8. Appraisal

8.1. This application should be read in conjunction with the previously approved application 23/00239/FUL. As the principle of the development, design and other such details have been accepted by the earlier scheme, the main issue for consideration is the removal of Condition 3 and the potential resultant:

- Impact on neighbouring amenity
- Impact on highways

Impact upon neighbouring residential amenity

8.2. Policy DM10 of the SADMP seeks to ensure that development proposals do not harm the amenity of neighbouring residential properties.

8.3. Paragraph 135 of the NPPF requires that development should ensure that a high standard of amenity is provided for existing and future users.

8.4. Condition 3 was imposed to ensure there are no adverse impacts on the amenity of the occupiers of neighbouring properties and to accord with Policies DM4 and DM10 of the Site Allocations and Development Management Policies DPD.

8.5. With the exception of the extension under consideration here, the facility has no planning restrictions limiting its opening hours. That being said the facility operates under self-imposed opening hours of 7am to 8pm. The proposed extension is

estimated to likely generate on average an additional 9 visits, 18 two way movements, to the site each day.

- 8.6. HBBC have not received complaints about the current operation of the facility outside of the planning applications in question. HBBC's pollution officer has also not raised an objection to the removal of condition 3.
- 8.7. Objections from nearby residents have however been received to the removal of condition 3 during the course of this application as listed above. Some of these concerns relate to potential noise and disturbance to residents. It is important to note that the extension has already been granted and therefore the additional vehicle movements and associated disturbance referenced in the object comments have been accepted by the LPA. The key difference to be assessed is whether additional access to the site outside of the approved opening hours would lead to adverse impacts for residents.
- 8.8. The approved extension is yet to be constructed. The operating hours of the existing facility is not restricted by a planning condition, however, it does not operate 24/7. There is therefore no established baseline on site for residents or the LPA to determine the potential impact of extended operating hours for the extended facility. However, the fall-back position for the applicant's remains that with the exception of the extension approved under application 23/00239/FUL the facility could operate 24/7. Therefore, an assessment must be made as to whether this extension is likely to cause significantly adverse impacts beyond that situation.
- 8.9. As outlined above and within Appendix A, the proposed extension is predicted to generate, on average an additional 9 visits per day compared to the average of 12 visits per day at the existing facility. The number of visits to the facility is reasonably low, but it is appreciated that the extension could almost double the number of visits per day. There would therefore be an intensification of the use of the site through the permitted extension. The evidence submitted with the application suggests that over a study period of 2 weeks users accessed the site throughout the day (7am to 8pm). The busiest period was between 7am and 8am in the morning and the quietest period is in the early evening. Were the opening hours extended, due to the nature of the use it is likely that most users would still access the unit within the existing timeframes.
- 8.10 The additional 9 visits a day are already permitted to access their storage from 5am to 11pm. The existing 12 visits per day are permitted to access 24/7. Increasing access hours from 5am to 11pm is not expected to create any increase in the intensity of traffic visiting the site across the day as a whole as already explained. Furthermore, it is unlikely that the majority of the additional 9 visits would occur before 5am and after 11pm, use outside of these hours is likely to be infrequent.
- 8.11 In terms of lighting, the submitted lighting evidence states that the only external lighting on the extension building itself will be one emergency light above a fire door. This would only illuminate in the event of an emergency, is low wattage and screened by the landscape buffer and so will not be a source for any adverse impact on neighbouring properties. The only other potential source of light would be from vehicles accessing the site during the hours of darkness. The light assessment considers the potential for light from these vehicle's headlights onto the windows of dwellings along Church Lane and Drayton Lane which back on to a field between 60-100m from the access road. There are some conifer trees which would provide some screening of lights from the access road, however, these are not so mature as to screen lighting entirely.
- 8.12 The lighting assessment states that:

“There is no doubt that vehicles using the proposed development at night will have their headlights on and that, dependant on the type of vehicle, stray light from vehicles may well be directed onto the back windows of dwelling along Church Lane. However, there is no specific guidance or limits on the amount of light from vehicle headlights entering the windows of a domestic dwelling as the main document which covers light pollution as a statutory nuisance, The Clean Neighbourhoods and Environment Act 2005, covers ‘artificial light emitted from premises’.

In the DEFRA document ‘Guidance on Sections 101 to 103 of the Clean Neighbourhoods and Environment Act 2005’ it clearly states (page 6) that the Act covers ‘artificial light emitted from premises so as to be prejudicial to health or a nuisance’ and as such, for example, street lighting is currently exempt from the Act although Local Authorities should try and resolve any light pollution from streetlight as the guidance also states: ‘The Government expects local authorities to take reasonable steps to investigate and, where appropriate, resolve problems from streetlights as a matter of good practice and consideration for the local environment and the community to which they are accountable’. It makes no such comments on stray light from vehicle headlights either specifically or in passing.

The question then arises as to why light from vehicle headlights is not covered in the Act, or subsequent guidance, on the various aspects of artificial light that make up the issue collectively called light pollution? The reason is clear as such guidance is only applicable to permanent light associated with ‘premises’ the reason given in the guidance as to why streetlighting is exempt”.

- 8.13 The light assessment notes that it is a reasonable assumption that all windows to the dwellings will have some sort of covering ie a curtain or blind. The assessment states this is relevant because “as lighting at night changes the sensitivity of a known receptor type (the residents in this case) is a function of that particular receptors’ ability to deal with change. Further, under the current EIA guidance the ‘magnitude of effect/impact’ caused by a change to a baseline condition is specifically linked to a receptors ability to adapt to that change”.
- 8.14 Overall, the lighting assessment notes there is no known guidance on the amount of stray light which may come from vehicle headlights onto the windows to dwellings. However, taking a common sense view it is likely that some light from headlights on the access drive may go onto the rear of dwellings along Church Road and Drayton Lane. In the officers opinion the existing screening will mitigate this to a degree but not in its entirety owing to the gaps between the planting at present. Nonetheless, the duration and frequency of additional lighting impacts is likely to be limited owing to the low likely additional vehicle movements before 5am and after 11pm.
- 8.15 Therefore, despite the number of visitors to the site being expected to increase through the permitted extension, owing to the likely limited increase in users accessing the site after 11pm and before 5am, alongside the distance to residential properties it is considered that increasing the access times to all parts of the site 24/7 will on balance not cause significant additional harm to neighbouring residential amenity. It is considered that the proposed removal of condition 3 and the resultant development would not have an adverse impact on neighbouring amenity and is in accordance with Policy DM10 of the SADMP and the Good Design Guide.

Impact upon highway safety

- 8.10. Policy DM17 of the SADMP seeks to ensure new development would not have an adverse impact upon highway safety. Policy DM18 of the SADMP seeks to ensure parking provision appropriate to the type and location of the development.

- 8.11. Paragraph 115 of the NPPF states that development should only be refused if there would be an unacceptable impact upon highway safety, or the residual cumulative impacts on the road network would be severe.
- 8.12. Access to the proposed extension would be via the existing access onto Drayton Lane. The access has a gate which is set back sufficiently from the road to allow a vehicle to pull clear of the highway whilst waiting for the gates to open. The section of road on which the access is located is a 30mph zone but is located close to a 60mph zone. Visibility splays towards the 60mph section of the road are in excess of 125m and 60m visibility can be achieved towards Fenny Drayton. For application 23/00239/FUL LCC Highways (the LHA) commented that the impacts of the development on highway safety would not be unacceptable, and when considered cumulatively with other developments, the impacts on the road network would not be severe. For the current variation of condition LCC Highways had no comments to make as the application pertains to the removal of the site operating hours only. As such there would appear to be no material impact on the public highway. Based on the information provided, the development therefore does not conflict with paragraph 115 of the National Planning Policy Framework (2023), subject to the conditions outlined at the end of this report.
- 8.13. For application 23/00239/FUL the Applicant undertook a survey within the site of vehicles visiting the site from 16 January 2023 until 29 January 2023. This included vehicle types, and the times the vehicle accessed the site. This demonstrated that a minimum amount of vehicles visiting the site in any one day was 8 and the maximum was 16, with 166 vehicles in total. The above information equates to an average of 11.9 vehicles a day with 24 x 2-way trips to the site a day. The methodology used by the Applicant for the expected trips to the site is based on the current level of trips to the site given the current Ground Floor Area (GFA) of 1,225sqm, and expected trips based on an additional 926sm² of floor space. Given the above the proposals could potentially generate an additional 9 vehicles (18 two-way movements) per day. During the morning and evening peak hours, this equates to one additional vehicle trip (2 two-way movements). The methodology used and the outcomes provided are accepted.
- 8.14. It is noted that PRoW T27 runs to the rear of the application site. For application 23/00239/FUL the LHA were satisfied that the use and enjoyment of Public Footpath T27 will not be significantly affected. The Applicant should note the informative at the end of this report. There is also a public right of way that crosses the access road leading to Drayton Lane. The number of additional vehicle trips associated with the storage and its 24/7 use would not have an adverse impact on the ability of the public to use the right of way or their enjoyment of the countryside.
- 8.15. The additional self-storage (B8) use should require additional car parking. However, the number of vehicle trips per day has been demonstrated with customers staying a very limited amount of time. There is an existing large car parking area for customers. It is considered that the existing car parking area is sufficient to cater for the needs of the existing and anticipated customers. As such the level of car parking is acceptable and the removal of condition 3 would not alter this position.
- 8.16. It is considered that the proposed development would be served by sufficient car parking and would not have an adverse impact on pedestrian and vehicular highway safety. Being mindful of paragraph 115 of the NPPF it is considered that the proposal would comply with policies DM17 and DM18 of the SADMP and the LHDG subject to the conditions outlined at the end of this report.

Other Matters

- 8.16 The applicant's submission raises concerns with the enforceability of the condition in particular would it be practicably possible to enforce the operating hours? The adjacent existing buildings used for self-storage are in the same ownership and share the same primary access but do not have time restrictions imposed through a planning condition and therefore users of the business may access the other buildings 24 hours a day and seven days a week. The result would present some difficulty in enforcing the operating hours, because a user of the site could use both the new extension and existing building for example. It would be hard to distinguish between users of the different buildings and therefore enforcing the imposed condition would be difficult. However, this reason alone has not been the determinative factor in reaching the recommendation.

9. Equality Implications

- 9.1. Section 149 of the Equality Act 2010 created the public sector equality duty. Section 149 states:-
- (1) A public authority must, in the exercise of its functions, have due regard to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 9.2. Officers have taken this into account and given due regard to this statutory duty, and the matters specified in Section 149 of the Equality Act 2010 in the determination of this application.
- 9.3. There are no known equality implications arising directly from this development.
- 9.4. The decision has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including General Data Protection Regulations (2018) and The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

10. Conclusion

- 10.1. The proposed development comprises the extension of opening hours (24/7) for an existing storage building in the countryside. The proposal involves the removal of Condition 3 of 23/00239/FUL for an existing self-storage business on a well maintained site. Application 23/00239/FUL showed that the development would enhance the setting of the existing building and would provide some economic growth and job creation benefits. The development is and remains to be in accordance with Policy DM4 of the SADMP in that regard.
- 10.2. As outlined in the report considering the existing use of the site, the potential increase in users of the site outside of the previously permitted hours and the distance to neighbouring properties, the removal of condition 3 and permitting the day to day operation of the extension for 24 hours would on balance not have a significantly adverse impact on neighbouring amenity. As such, the proposal would continue to be in accordance with Policy DM10 of the SADMP and is therefore recommended for approval.

11. Recommendation

11.1. Grant planning permission subject to:

- Planning conditions outlined at the end of this report.

11.2. Conditions and Reasons

1. The development hereby permitted shall be begun before the expiration of three years from the date of the original planning permission (23/00239/FUL) (9 June 2023).

Reason: To comply with the requirements of Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall not be carried out otherwise than in complete accordance with the submitted application details, as follows:

- Proposed Block Plan (received on 16/03/2023)
- Proposed Elevations & Floor Plan (received on 16/03/2023)
- Proposed Site Plan (received 16/03/2023)
- Site Location Plan (received 16/03/2023)

Reason: To ensure a satisfactory appearance and impact of the development to accord with Policy DM10 of the adopted Site Allocations and Development Management Policies DPD.

3. Prior to first use of the storage facility hereby approved a scheme of soft landscaping works to incorporate planting of native trees and plants for the site, including an implementation scheme, shall be submitted to and approved in writing by the local planning authority. The landscape planting already in place shall be maintained in perpetuity. The soft landscaping scheme shall be carried out in full accordance with the approved landscaping scheme in the first planting season following occupation of the storage facility. Any trees or shrubs which die or are damaged, removed, or seriously diseased shall be replaced by native trees or shrubs of a similar size to those originally planted.

Reason: To ensure that the development leads to an enhancement of the setting of the application site to accord with Policy DM4 of the Site Allocations and Development Management Policies DPD.

4. The development hereby permitted shall not be occupied until such time as the parking and turning facilities have been implemented in accordance with 'Proposed Plan', received by the LPA on 16 March 2023. Thereafter the onsite parking and turning provision shall be kept available for such use(s) in perpetuity.

Reason: To ensure that adequate off-street parking provision is made to reduce the possibility of the proposed development leading to on-street parking problems locally (and to enable vehicles to enter and leave the site in a forward direction) in the interests of highway safety and in accordance with Policy DM17 and DM18 of the Site Allocations and Development Management Policies DPD and the National Planning Policy Framework (2023).

11.3. Notes to Applicant

1. The approved development may require Building Regulations Approval, for further information please contact the Building Control team via e-mail at buildingcontrol@hinckley-bosworth.gov.uk or call 01455 238141.
2. In accordance with best practice guidance relating to lighting and biodiversity (Miles et al, 20183 ; Gunnell et al, 20124), any new or temporary lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species. Examples of good practice include:
 - Avoiding the installation of new lighting in proximity to key ecological features, such as hedgerows.
 - Using modern LED fittings rather than metal halide or sodium fittings, as modern LEDs emit negligible UV radiation.
 - The use of directional lighting to reduce light spill, e.g. by installing bespoke fittings or using hoods or shields. For example, downlighting can be used to illuminate features such as footpaths whilst reducing the horizontal and vertical spill of light.
 - Where the use of bollard lighting is proposed, columns should be designed to reduce horizontal light spill.
 - Implementing controls to ensure lighting is only active when needed, e.g. the use of timers or motion sensors.
 - Use of floor surface materials with low reflective quality. This will ensure that bats using the site and surrounding area are not affected by reflected illumination.
3. a) Prior to construction, measures should be taken to ensure that users of the Public Right(s) of Way are not exposed to any elements of danger associated with construction works. b) The Public Right(s) of Way must not be re-routed, encroached upon or obstructed in any way without authorisation. To do so may constitute an offence under the Highways Act 1980. c) The Public Right(s) of Way must not be further enclosed in any way without undertaking discussions with the Highway Authority (0116) 305 0001. d) If the developer requires a Right of Way to be temporarily diverted, for a period of up to six months, to enable construction works to take place, an application should be made to networkmanagement@leics.gov.uk at least 12 weeks before the temporary diversion is required. e) Any damage caused to the surface of a Public Right of Way, which is directly attributable to the works associated with the development, will be the responsibility of the applicant to repair at their own expense to the satisfaction of the Highway Authority. f) No new gates, stiles, fences or other structures affecting a Public Right of Way, of either a temporary or permanent nature, should be installed without the written consent of the Highway Authority. Unless a structure is authorised, it constitutes an unlawful obstruction of a Public Right of Way and the County Council may be obliged to require its immediate removal.

APPENDIX A

The applicant/agent were asked a series of questions by the case officer, these are included and underlined below with the applicants response below in *italics*.

1. Has the consent been implemented yet?

'The consent has not been implemented and will not be implemented whilst the unnecessary access hours condition (5am to 11pm) is attached.

The current restriction will limit the consented buildings competitiveness, economic viability and value. As the popularity of self-storage grows in the UK, and the industry becomes more competitive, unlimited access is becoming an increasingly important factor for people choosing where to store their belongings.

The existing self-storage buildings on site have permission for unrestricted access. The consented extended building, would be joined internally and accessed from the same access way, yard and roller shutter door as the existing buildings. There would be no additional external lighting. For the purposes of an assessment of residential amenity, there would be no change from the existing. Due to the extensive landscaping, distance of the houses on Church Lane from the site and very limited traffic generation (particularly at night) there would be no adverse impact on the amenity of the occupiers of neighbouring properties or the visual amenity of the countryside. The acoustic survey and lighting report supports this assessment'.

2. What times are visitors attending the site at the moment?

'Figure 1 below, shows the times that visitors visited the site during a 2 week survey that was conducted for planning application 23/00239/FUL.

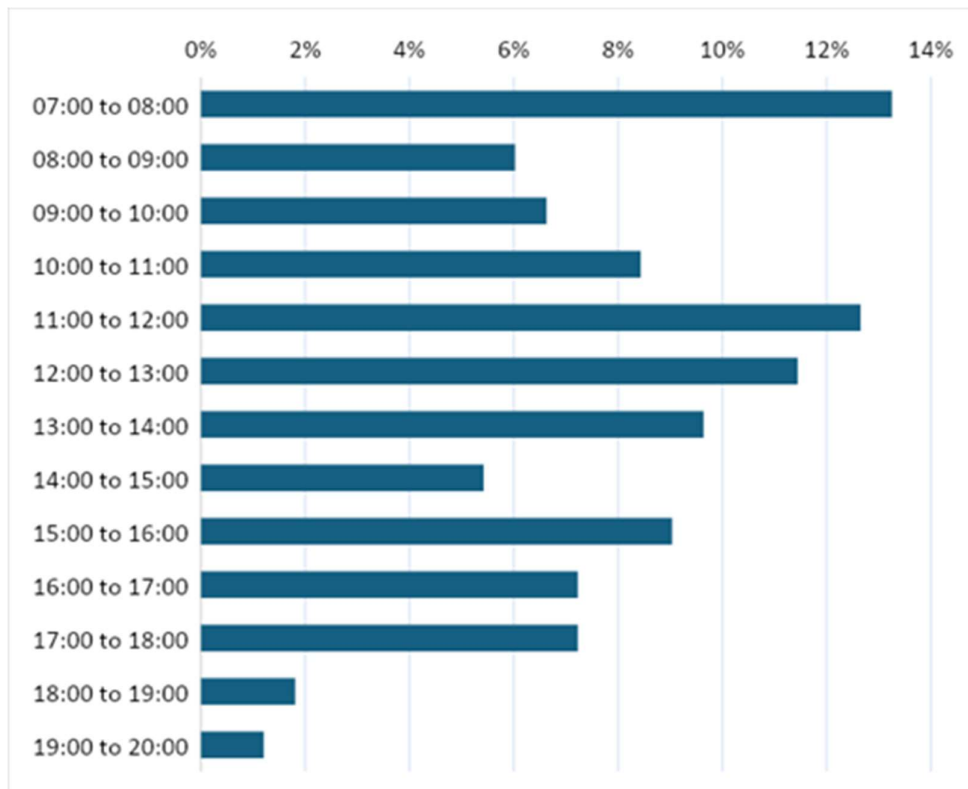


Figure 1 – distribution of access hours at the existing self storage buildings

The 3 existing planning permissions for self storage buildings at the site facilitate 24 / 7 access.

To date, the existing buildings operate under voluntary access hours of 7am to 8pm.

From figure 1 above, users access the site throughout the day. The busiest period is between 7am and 8am in the morning and the quietest period is in the early evening.

At the time of the survey, 86% of customers were household customers and 14% business users.

Household customers typically store furniture between house moves, during renovation projects, to create space to work from home etc. These users are very unlikely to want to access their things in the night. 24 hour access simply gives peace of mind that they could access things if they really needed to.

Business customers are typically tradesmen like carpenters, plumbers, electricians, builders etc as well as sales representatives and retailers. Again, the chance of these customers accessing their things outside of normal working hours are very low. But it is a competitive advantage to an operator if they are able to offer customers the peace of mind that they could access things late at night or early in the morning if they really needed to.

It is a common misconception that self-storage creates large numbers of vehicle movements. The reality is, that across the UK, 75% of people visit their unit once a month or less (from the 2024 UK Self Storage Association Annual Report)

The same annual report showed that access hours is the 2nd most important reason residential customers choose their self-storage facility (after proximity of location to their home or work).

24 hour access is becoming more and more common place in the industry as access control systems and security technology improves and stores become increasingly automated.

3. How many visitors visit the consented scheme?

'During the survey period, just 12 people a day visited the existing buildings on site. That equates to less than 1 vehicle per hour spread over the current 13 hour operating day (7am to 8pm).

We would note that there has never been a single complaint lodged with Hinckley & Bosworth council about the level of traffic or noise / disturbance at the consented scheme. The existing site opened over 10 years ago in 2012.

If the existing buildings were open 24/7 (which they are permitted to be under the consented planning permissions they operate under) the applicant would expect the hours that customers access the site to continue to be very similar to the distribution shown in figure 1.

Householders will not change to wanting to access their fridges and sofas in the middle of the night.

Business customers that typically work 9am to 5pm will not change to accessing their tools and marketing materials at the very early hours of the morning for example.

24 hour access will not increase the intensity of traffic accessing the site. There may just be a very slight shift in the distribution of the times the 12 people a day currently visiting the site, access their things.

The existing buildings on site are 1,225sqm. If these buildings generate 12 visits per day over a 24 hour period it is expected that the 926sqm building permitted under 23/00239/FUL will generate an extra 9 visits per day.

These 9 visits a day are already permitted to access their storage from 5am to 11pm. (The existing 12 visits per day are permitted to access 24/7). Increasing access hours from 5am to 11pm is not expected to create any increase in the intensity of traffic visiting the site as already explained.

It will be extremely rare that a user will access their storage unit before 5am and after 11pm. Increasing the access times and regularising the site so that access is possible to all parts of the site 24/7 will not cause additional harm.

In any event, the very limited expected access after 11pm and before 5am will not cause nuisance to households on Church Lane (which are more than 125m (400ft) away) as set out in the acoustic and lighting reports submitted with 24/00627/CONDIT'.

4. Can you provide a review of all competitors in the area including those that are not open 24/7?

Storage Company	Location	Distance from Extra Room Self Storage	Does the planning permission allow unrestricted 24 hour access?	Current operational access hours
Low Price Storage	Nuneaton	2 miles	Yes	24 hours
Glenn Removals & Storage	Nuneaton	4 miles	Yes	Mon to Sat: 8:30am to 6:30pm Sun: 10:30am to 4pm Out of hours by appointment
Gatehouse Self Storage	Nuneaton	5 miles	Yes	6am to 11pm
Montague Storage	Nuneaton	5 miles	Yes	Mon to Thur: 8am to 5pm Fri: 8am to 4pm Sat: 9am to 1pm
Store The Lot	Nuneaton	6 miles	Yes	24 hours
Hinckley Storage	Hinckley	6 miles	Yes	24 hours

Nuneaton Self Storage	Nuneaton	6 miles	Yes	5am to 11pm
J&R Self Storage	Nuneaton	7 miles	Yes	24 hours
Windy Corner Self Storage	Barwell	8 miles	Yes	6am to 9pm
Store The Lot	Hinckley	9 miles	Yes	24 hours
GTB Self Storage	Barwell	9 miles	Yes	Mon to Fri: 7am to 7pm Sat: 8am to 7pm Sun: 10am to 4pm
Beyond Storage	Thornton	13 miles	Yes	24 hours
Safestore Self Storage	Coventry	13 miles	Yes	24 hours
Access Self Storage	Coventry	14 miles	Yes	24 hours

Most local competitors operate with 24 hour access. Those that do not offer 24 hour access are able to offer the service under the terms of their planning consent but have voluntarily chosen to operate reduced hours. This will typically be because the stores are smaller in size and have limited resources to justify the cost of installing the equipment required to facilitate 24 hour access and the out of hours support needed.

The stores labelled in blue represent the primary competitors to Extra Room Self Storage. These stores are professional, modern, high quality, indoor self-storage facilities offering comparable levels of service and specification. All but one of these primary competitors already offer 24 hour access. All are able to offer 24 hour access if they choose to'.

5. What are the vacancy rates of the storage units at the moment

'The existing building is fully let. This was the main reason for pursuing an extension to the existing storage facility.

The extension will require significant investment and the applicant is wanting to maximise the chance of successful growth of the business. The competitive advantage from being able to offer 24 hour access is significant and could undermine the level of investment being proposed. Whilst negligible in vehicular movements its economic impact is great'.