



## **PLANNING STATEMENT**

**Outline application for up to 92 self-storage containers  
with all matters under consideration apart from  
landscaping**

**Part of Plot 3  
Delta Enterprise Park  
Goole  
DN14 8JZ**

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# 1 INTRODUCTION

## Context

- 1.1 This Statement has been prepared by Dewar Planning Associates on behalf of Mr Lee Howard (the "Applicant") to accompany an outline planning application for up to 92 self-storage container units (the "Proposed Development") on Land south of Court House Farm Cottage.

## Accompanying Documents

- 1.2 This outline application has all matters under consideration except for the landscaping details. There is ample space to provide a sufficient landscaping scheme to the Councils standards.
- 1.3 The application is accompanied by the following plans and documents:
- Completed Planning Portal Planning Application Form;
  - AMA Flood Risk Assessment, Sequential Test and Drainage Strategy;
  - AMA Highways Supporting Statement;
  - Quants Environmental Preliminary Ecological Appraisal including Baseline BNG Assessment
  - MT Surveys 2D Topographical Survey Plan 1485-105\_2D (A0)
  - 001 Site Location Plan A4;
  - 002 Site Layout Plan A3; and
  - 003 Proposed Elevations Plan A3.

## The Proposal

- 1.4 The proposed development seeks permission to locate up to 92 self-storage container units within the application site. Each unit has dimensions of 6.09 metres long by 2.43 metres wide with a total height to the flat roof of 2.62 metres. Each secure lockage storage unit would provide just under 14 square metres of storage space for users of the site.

## Site Context

- 1.5 The application site is located on former agricultural grassland south of Court House Farm Cottage. Access from Rawcliffe Road (A614) is existing with a new proposed access onto site indicated in the submitted layout plan.
- 1.6 The site is bounded immediately north by the storage and distribution facility as approved under application 21/03405/STPLF as well as other light industrial and commercial uses to the north, west and east.
- 1.7 The site is served by an existing established access which is wide enough for two-way HGV movement. The site is within close proximity to other commercial businesses and has close links to the strategic road network (A614) and the M62.
- 1.8 Sufficient space is available for vehicle parking, turning, and manoeuvring to allow access and egress of the public highway in forward gear.



Figure 1.1 application site in context

## Planning History

- 1.9 A pre application enquiry was submitted in the summer of 2023 (ref.23/10392/PREP) and a response received in June 2023 for the proposed siting of up to 100 self-storage shipping container storage units (B8). The pre

application response stated that any further application would need to include a detailed justification as to why the site should be considered for this development and why other allocated sites and existing sites within the development limits are not deemed suitable by the Applicant. Additionally, comments provided regarding ecology and flood risk recommended further detailed surveys and reports.

- 1.10 There is no other planning history for the application site, however the site borders a recent approval to the north for the erection of a B8 storage and distribution facility with ancillary office, HGV and staff parking provision (ref. No: 21/03405/STPLF). The site also borders land to the south which is an application still pending for the erection of two industrial units for B8 and E(g) use, incorporating two storey office block for associated business use, with associated works (ref.21/02915/STPLF).



Figure 1.2 public access screenshot showing adjacent applications

## 2 PLANNING POLICY

### The Local Plan

- 2.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Section 70(2) of the Town & Country Planning Act 1990 requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.
- 2.2 East Riding of Yorkshire Council Local Plan 2016 policies considered relevant to the proposal are as follows:
- 2.3 The key policies of the Local Plan are (not a closed list):
- Policy S1 – Presumption in favour of sustainable development
  - Policy S4 – Supporting development in villages and the countryside
  - Policy S6 – Delivering employment land
  - Policy EC1 – Supporting the growth and diversification of the East Riding economy
  - Policy ENV1 – Integrating high quality design
- 2.4 Other guidance includes:
- Level 2 Strategic Flood Risk Assessment for Goole (2019)
  - East Riding Local Plan Allocations Document

### National Planning Policy Framework & Guidance

- 2.5 The National Planning Policy Framework (NPPF) was last updated in December 2023. Local Planning Authorities (LPAs) are required to take its content into account when preparing their Development Plans and it is a material consideration when making decisions on planning applications or appeals.
- 2.6 Paragraph 7 of the NPPF states that 'The purpose of the planning system is to contribute to the achievements of sustainable development'. According to

Paragraph 8, 'Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- i) An economic objective
- ii) A social objective
- iii) An environmental objective

- 2.7 Paragraph 12 relates to the presumption given to sustainable development 'The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.'
- 2.8 Paragraph 88 states that planning policies and decisions should enable (amongst other criteria) the development and diversification of agricultural and other land-based rural businesses.
- 2.9 With regard to transport, Paragraph 115 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 2.10 Section 12 concerns states that the creation of high quality buildings and places is fundamental to what the planning and development process 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. Paragraph 135 goes on to state that planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good



architecture, layout and appropriate and effective landscaping; and are sympathetic to local character and history.

- 2.11 Section 14 of the NPPF seeks to meet the challenge of climate change, flooding and coastal change. Paragraph 165 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

## 3 PRINCIPLE OF DEVELOPMENT

### Acceptability in Principle

- 3.1 The application site lies outside the development limits of any settlement as detailed in the adopted East Riding Local Plan Strategy Document ('LPSD') (2015) and is therefore classed as within the countryside. Development within the countryside is supported under policy S4 of the LPSD. Policy S4 part A states that development within the countryside can be supported where it:
- I. Is of an appropriate scale to its location taking into account the need to support sustainable patterns of development;
  - II. Encourages the re-use of previously developed land where appropriate; and
  - III. Does not involve a significant loss of best and most versatile agricultural land.
- 3.2 Policy S4 part C goes on to state that employment development in accordance with policy EC1 is one of the forms of development deemed acceptable within the countryside. Additionally, paragraph 85 of the NPPF sets out that significant weight should be placed on the need to support economic growth and productivity.
- 3.3 As explained under the planning history, the application site falls between two other sites which have benefited from planning permission. Under the approved application ref 21/03405/STPLF (B8 storage and distribution facility with ancillary office, HGV and staff parking provision) planning permission was given due to a number of factors including an acknowledgement that policy EC1(a) of the Local Plan supports growth and diversification of the East Riding economy where it is of a suitable scale for its location. It is accepted however that this application was largely approved due to an expansion of an existing business. The application site provides a natural infilling between this extant approval and the approval ref.21/02915/STPLF for two industrial units for B8 and E(g) use. We acknowledge that the site is in open countryside in planning policy terms as noted by the pre application response, but the proposed development for

secure storage containers on redundant former agricultural land is considered to be appropriate by nature of its scale and location adjacent to similar land uses surrounding. Furthermore, Policy EC1(d) allows development to come forward within or adjacent to an existing industrial estate which will indeed be the case once the industrial proposal under planning ref. 21/03405/STPLF is built out.

- 3.4 The development will meet the criteria of policies S4 and EC1 as well as the NPPF and is therefore considered acceptable in principle subject to the consideration of other material planning matters which are discussed in turn in the following section of this report.

## 4 MATERIAL PLANNING CONSIDERATIONS

### Impact on the Character and Appearance of the Area

- 4.1 Paragraph 131 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process 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.
- 4.2 The design, scale and orientation of the proposed storage units has been considered so that the development would have a low impact and well assimilated into the surrounding area and be seen in context with the other light industrial and commercial uses nearby. The proposed development would be well hidden from wider views, between the two existing approved sites. The layout and design of the site is considered to meet the requirements of Policy ENV1 as well as the NPPF.

### Access and Highway Safety

- 4.3 With regards to transport, paragraph 115 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Policies DM05 and DM06 state that development must ensure safe and well-designed vehicular access and egress, with appropriate levels of parking provision within a well-designed layout.
- 4.4 The plot of the application site is large enough to accommodate up to 100 container storage units with space available for safe access, parking and turning. The development would utilise the existing access route off Rawcliffe Road as used by other commercial operations in the area.
- 4.5 A Highways Supporting Statement is submitted in support of this application, the statement by Andrew Moseley Associates concludes that the proposal would not result in any detrimental highways impact on capacity or road safety and therefore there are no traffic or transportation reasons preventing granting of

planning permission for the development proposals in accordance with the National Planning Policy Framework.

## **Flood risk and Drainage**

- 4.6 A Flood Risk Assessment with Sequential Test and Drainage Strategy is submitted in support of this application. The assessment and strategy should be read in full with the conclusions by Andrew Moseley Associates that the proposed development is an acceptable use within Flood Zone 3.
- 4.7 The application site is in an area identified as having a high probability of flooding on the EA Flood Map and is located in Flood Zone 3.
- 4.8 The proposed development falls within 'less vulnerable' classification within Table 2 of Planning Practice Guidance (PPG). When using Table 3 of the same guidance the proposed development is considered in principle to be appropriate.
- 4.9 In line with the requirements of East Riding of Yorkshire Council, the LLFA for the area, and the National Planning Policy Framework, a Sequential test is required to be undertaken due to the location of the development being in Flood Zone 3.
- 4.10 This Sequential Test has identified and considered 18 different potential sites for the proposed development, with varying sizes and characteristics. The sites considered have been accounted for as unsuitable for the proposed development on the basis of size, flood risk, or other requirements for the site.
- 4.11 The sequential test concludes that there are no available or suitable alternative sites for the proposed development that are at a lower risk of flooding.
- 4.12 Regarding a drainage strategy, the primary option for surface water disposal is to outfall to a watercourse to the west of the site. There is a suitable watercourse in the vicinity of the site which could be utilised to dispose of surface water from the site. It is proposed that surface water will discharge through an outfall with a discharge rate of 1.6 l/s. Attenuation is required as the means of surface water disposal is through an outfall to a watercourse. Furthermore, there will be a restricted discharge limit of 1.6 l/s based on the greenfield run-off rate.

- 4.13 The proposed development has been shown to comply with the Level 2 Strategic Flood Risk Assessment for Goole (2019) as well as the NPPF, as it is based upon an appropriate type of development for the flood zone classification, no other sequentially preferable sites found and a suitable drainage strategy presented.

### **Ecology and Biodiversity Net Gain**

- 4.14 A Preliminary Ecological Appraisal with baseline biodiversity net gain assessment by Quants Environmental has been submitted in support of this application. The assessment concludes that it is not considered that the development will impact on any bats, bird or protected species or protected sites within the local area and recommends that native species are included within the landscape design, along with additional habitat features such as hedging and tree planting where feasible.
- 4.15 The ecology appraisal also states that care should be taken to ensure no artificial lighting is directed onto any habitats around the site and recommends that construction and operation of the project is undertaken in accordance with a suitable Construction Environmental Management Plan.
- 4.16 In accordance with the DEFRA guidelines, the biodiversity calculation has been used to present a baseline value of the site (prior to development). The habitat type and area is modified grassland at 3809 square metres, representing 0.76 habitat units.

### **Landscaping**

- 4.17 The application site provides multiple opportunities for landscaping due to its location and scale. This is not a consideration of this outline application with matters of landscaping reserved for any further application. Any landscaping would be intrinsically linked to the biodiversity net gain proposals as outlined above.

## 5 CONCLUSION

- 5.1 Paragraph 38 of the NPPF states that local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. It goes on to state that local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible.
- 5.2 the application site falls between two other sites which have benefited from planning permission. Under the approved application ref 21/03405/STPLF (B8 storage and distribution facility with ancillary office, HGV and staff parking provision) planning permission was given due to a number of factors including an acknowledgement that policy EC1 (a) of the Local Plan supports growth and diversification of the East Riding economy where it is of a suitable scale for its location. It is accepted however that this application was largely approved due to an expansion of an existing business. The application site provides a natural infilling between this extant approval and the approval ref.21/02915/STPLF for two industrial units for B8 and E(g) use. We acknowledge that the site is in open countryside in planning policy terms but the proposed development for secure storage containers on redundant former agricultural land is considered to be appropriate by nature of its scale and location adjacent to similar land uses to the north. Furthermore, Policy EC1(d) allows development to come forward within or adjacent to an existing industrial estate which will indeed be the case once the industrial proposal under planning ref. 21/03405/STPLF is built out.
- 5.3 All relevant material planning considerations, except for landscaping which remains reserved have been addressed and the development will have no negative impacts with regard to visual impact, highway impacts or flood risk or ecology and biodiversity.
- 5.4 Given the above the local planning authority is respectfully requested to view the proposal favourably.

