

ET Planning

Planning, Design and Access Statement

Client:

Mr Andrew Wright -
The Wright Buy Holdings Ltd

4 Hollands Road,

Haverhill, CB9 8PP

change of use of land to Storage and Distribution (Use Class B8), to allow for the siting of stacked storage containers facilitated by the demolition of an existing outbuilding.

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1. Introduction

- 1.1 This statement is produced to support a planning application for the change of use of land to Storage and Distribution (Use Class B8), to allow for the siting of stacked storage containers facilitated by the demolition of an existing outbuilding at the rear of 4 Hollands Road, Haverhill, CB9 8PP.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and plans prepared by Cleveland Containers.
- 1.4 The relevant application fee will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The application site is situated to the rear of an existing commercial/light industrial unit, located on the Northern side of Hollands Road, within the settlement boundary of Haverhill. The surrounding character of the area is predominantly commercial/light industrial comprising mostly of warehouses and office spaces of differing built forms and architectural styles. Access is awarded to the rear of the site via the existing and established in/out route that direct vehicles to the rear of the site. Customers and staff of the existing industrial unit will continue to utilise the parking at the front of the site.
- 2.2 The site is not situated within the Green Belt, or a National Landscape (formally AONB), nor is it located within a Special Area of Conservation (SAC) or Special Protection Area (SPA). Additionally, the site is not located adjacent to or in the vicinity of any Listed Buildings or Scheduled Monuments. The site is located within Flood Zone 1 which carries the lowest probability of flooding. As identified within the Local Plan Policies Map, the application site is located within an area designated as general employment areas and rural employment areas (Policy SP23).

3. Planning History

The planning history of 4 Hollands Road is as follows;

- 3.1 Application Ref DCON(A)/20/1651: Application to discharge of condition 4 (cycle storage) of DC/20/1651/FUL. Approved 05/01/2021

- 3.2 Application Ref DC/20/1651/FUL: Planning application - change of use from taxi office (sui generis) to dance school (class E(d)). Approved 08/12/2020
- 3.3 Application Ref SE/05/1456/P: Planning Application - Change of use from B1 office to taxi control office and erection of aerial mast. Approved 04/05/2005

4. Development Proposals

- 4.1 The application site comprises previously developed land, located in a sustainable location within an urban area. The development proposal seeks the change of use of the land to B8 (Storage and distribution). It is proposed to use the land to store steel shipping containers, which will be used for self-storage on the site.
- 4.2 It is proposed that the storage containers will be double stacked (i.e. two storeys), providing additional storage on the first floor. The upper containers will be accessed via moveable stairs.

5. Policy Assessment

- 5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.
- 5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 39 of the NPPF states that "Local planning authorities should approach decision on proposed development in a positive and creative way" and "at every level should seek to approve applications for sustainable development where possible". Paragraph 124 of the

NPPF comments that planning should “promote an effective use of land” in “meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions”.

- 5.3 Paragraph 87 of the NPPF states ‘Planning policies and decisions should recognise and address the specific locational requirements of different sectors. 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 and in suitably accessible locations.’
- 5.4 Paragraph 131 identifies that “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”, whilst paragraph 139 states that significant weight should be given to “outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”
- 5.5 Paragraph 116 of the NPPF notes 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.’
- 5.6 The glossary of the NPPF defines previously developed land (PDL) as *‘Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by*

landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape. It is considered the site meets the definition of previously developed land.

- 5.7 In conclusion, the National Planning Policy Framework provides a robust foundation for supporting the use of storage containers on previously developed land. This is rooted in the framework's emphasis on sustainable development through its three pillars: economic, social, and environmental objectives. Utilising PDL aligns with the economic objective by ensuring land is available in the right places to support growth and infrastructure development. It also meets the social objective by potentially contributing to the creation of a small enterprise which would encourage social interaction whilst improving the aesthetic of a place by the redevelopment of derelict or underutilised sites.
- 5.8 Moreover, the environmental objective is addressed by promoting the effective use of land, minimizing waste, and mitigating climate change. The aforementioned framework paragraphs highlight the need to cater to specific locational requirements of various sectors, including storage and distribution, and to support the diversification of land-based businesses. The NPPF's definition of PDL and the guidance in paragraphs 124 and 125c highlight the value of reusing brownfield sites, emphasising their suitability for development to meet housing and other needs while improving the environment.
- 5.9 Therefore, the NPPF's principles and directives collectively endorse the use of storage containers on previously developed land, fostering

a balanced approach to economic growth, community well-being, and environmental stewardship.

- 5.10 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.11 All planning applications should be dealt with in accordance with the relevant development plan policies unless material considerations indicate otherwise. The NPPF is a material planning consideration all planning applications. In this instance, the relevant development plan documents are;
- West Suffolk Local Plan 2024-2041 (Adopted July 2025)
- 5.12 Local Plan **Policy SP12: The Spatial Strategy** outlines that the plan makes provision for development needs and supporting infrastructure for the district to 2041. A sustainable pattern of development that conserves and enhances the natural, built and historic environment and seeks to mitigate climate change and adapt to its effects will be promoted.
- 5.13 Provision of employment land is focused in the most sustainable settlements, the towns and key service centres and adjacent to existing rural employment areas. The strategy recognises the important role that existing general and rural employment areas play in accommodating local businesses in the district.
- 5.14 **Policy LP23: General employment areas and rural employment areas** ensures existing general employment areas and rural employment areas will continue to meet local and sub regional employment needs. These sites will be protected for employment uses as described in the policy, in order to maintain an adequate

supply of employment land. They will continue to be primary locations for employment uses including, offices (subject to satisfying a sequential test as required by policy SP22), research and development, light industrial, general industrial and storage and distribution.

5.15 The application site is situated within the existing general employment area of Haverhill Industrial Estate, as identified on the West Suffolk Local Plan 2024 to 2041 Policies Map. The proposed development would make more efficient use of previously developed land by providing modern, flexible storage facilities without the need for substantial new built form, thereby intensifying the site's use in a sustainable manner. The modest scale of the container storage operation, together with the proposed two-storey arrangement, ensures that the development remains compatible with the character and function of the wider industrial estate and will not result in adverse impacts on neighbouring uses in terms of noise, traffic, or visual amenity as detailed within this statement.

5.16 **Character and Appearance of the Area:** Local Plan **Policy SP4: Design** ensures proposals for all new development must create and contribute to a high quality, safe and sustainable environment by adhering to numerous principles, including but not limited to having regard to density, street layouts, scale, height and massing and the relationship of built form to landscape. In addition to this, the policy ensures development adheres to local character and context of the proposed development. Anchoring new developments within their immediate and local contexts maintaining or creating a sense of place and/or local character.

5.17 The site lies within an established employment and commercial area characterised by a mixture of industrial, trade, and service uses, displaying a variety of building types, scales, and materials. The

architectural character along Hollands Road is mixed, comprising traditional brick-built industrial units, modern metal-clad warehouses, and internal storage compounds, reflecting the area's long-standing evolution as a functional employment zone rather than one defined by architectural uniformity.

- 5.18 The proposed storage containers would be positioned to the rear of an existing industrial building at the site, well contained within the existing yard area, and largely screened from public view by existing boundary treatments and surrounding built form.
- 5.19 The scale and functional design of the containers are consistent with the utilitarian character typical of the locality and would not appear incongruous within this context. As such, the development would not harm the visual amenities of the wider area and would maintain the established industrial character of Hollands Road, thereby complying with local and national planning policies relating to design and character.
- 5.20 The proposed storage containers are moderate in terms of scale, footprint and built form when assessed in the context of the industrial area of which the site is located. Neighbouring buildings are of a much greater built form, therefore the proposal for two story containers is considered to not harm the existing character of the area and is compliant with local plan policies in this regard.
- 5.21 **Residential Amenity:** Policy SP4 of the West Suffolk Local Plan is designed to ensure that development safeguards the amenity of both existing and future residents and users. It requires that proposals are sensitively planned and appropriately designed to prevent adverse impacts such as noise, pollution, overlooking, loss of light, or increased traffic disturbance.

- 5.22 The proposed change of use is not anticipated to give rise to any adverse impacts on residential amenity. The site is situated within an established employment and industrial area, well separated from the nearest residential properties by existing commercial buildings and intervening land uses. This spatial separation ensures that any noise, activity, or vehicle movements associated with the storage use will be effectively contained within the site and the surrounding commercial context.
- 5.23 The proposed containers will not involve any manufacturing or processing activities, and their use will primarily be for the storage of goods mainly for personal use rather than commercial, resulting in limited noise or disturbance. In addition, the positioning of the containers to the rear of the site, combined with existing boundary treatments and the height of surrounding structures, will prevent any loss of outlook, privacy, or light to neighbouring occupiers.
- 5.24 Consequently, the proposal is considered to preserve an acceptable standard of amenity for nearby residents and fully accords with local and national planning policies aimed at protecting residential living conditions.
- 5.25 **Trees and Landscaping:** Policy SP4 and LP9 requires that development proposals respect and respond positively to the character and appearance of the local landscape. This includes ensuring that new development is appropriately scaled, designed, and sited to integrate with its surroundings, avoiding harm to valued townscape or landscape features.
- 5.26 The proposed siting of containers would have no adverse impact on trees or landscaping. The site comprises existing hardstanding within an established commercial yard and does not contain any soft landscaping, trees, or vegetation of amenity value. As such, the

development would not necessitate the removal of any trees or green features, nor would it encroach upon landscaped areas or natural habitats.

- 5.27 The proposal would therefore maintain the current visual and environmental characteristics of the site. Given its wholly developed nature (previously developed land) and the lack of any ecological or landscape constraints, the change of use and introduction of the storage containers would not detract from the appearance or environmental quality of the area. The proposal is therefore considered fully acceptable in terms of its impact on trees and landscaping.
- 5.28 **Transport and Parking:** Paragraph 116 of the NPPF sets out the test that a determining authority should apply when determining the suitability of a planning application in terms of transport and highways stating 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.'*
- 5.29 Suffolk's Guidance for Parking Technical Guidance, prepared by Suffolk County Council (third edition adopted May 2019) sets out parking guidance for Use Class B8. The requirement is for 1 space per 150sqm. The proposal seeks to create no.8 parking spaces so is considered that the proposal is compliant with these requirements.
- 5.30 The proposal would utilise the site's existing and established access points, which are already designed to accommodate commercial and service vehicles associated with the current and surrounding industrial uses. No alterations to the access arrangements or circulation areas are proposed, and sufficient on-site space would remain for vehicle manoeuvring, loading, and unloading. The level of

vehicle movements associated with the proposed B8 use is expected to be comparable to, or potentially lower than, those generated by other lawful commercial operations in the vicinity. In addition, the proposal would not result in the loss of existing parking provision or create a demand exceeding the site's capacity. As such, the development would not give rise to any highway safety concerns or parking pressures and is fully compliant with local and national transport planning policies.

- 5.31 **Drainage and SuDS:** The site falls within Flood Zone 1 and is not considered to be at risk of flooding. It is considered that flood risk should not limit the proposed development and that any required details can be secured by planning condition.
- 5.32 **Ecology/BNG:** Due to the site benefitting from being situated entirely on previously developed land (hardstanding), the proposal would comply with the de minimis exemption as the development does not affect 25 square meters of non-priority, on-site habitat nor does it affect 5 meters of non-priority linear habitat (ie hedgerow).
- 5.33 With regards to the demolition of the existing outbuilding, this appears to be of a prefabricated design, with a flat roof. The potential for bats to roost in a prefabricated building with a flat roof is minimal from an ecological perspective. Such structures typically lack the key features bats seek for roosting, such as crevices, voids, or sheltered eaves that provide stable microclimates and protection from predators and weather. Prefab buildings are often constructed with tightly sealed materials and smooth finishes, offering few entry points or suitable roosting spaces.
- 5.34 **Contamination:** There is no known contamination on the site. However, it is considered that any additional information can be secured by planning condition if required.

- 5.35 **Community Infrastructure Levy:** The relevant forms have been completed and submitted with this application.

6. Conclusion

- 6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.
- 6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed change of use to allow for the siting of containers would not lead to any adverse effects on the character of the area or the amenity of neighbouring residents.
- 6.3 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted.



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A handwritten signature in black ink that reads 'Emily Temple'.

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