



LAND & PLANNING
SERVICES LIMITED

Planning Design and Access Statement

Land at former Cooper Tires site, Scotland Road, Melksham, Wiltshire
February 2026

Part retrospective application for the storage of 20 self-storage units and additional units to a total of 72 self-storage units on previously developed land.

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S & L LAND AND PLANNING SERVICES LIMITED

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1.0 Introduction

- 1.1 S & L Land and Planning Services Ltd have been commissioned by Mr Timothy Brant Coles to submit this full planning application following an Enforcement investigation into the use of the site. The client mistakenly thought that the site was a commercial site with a B1/B8 use due to the previous use of the Cooper Tires site. Therefore, this application is part retrospective for the 20 units already placed on site, and for a further 52 units to a total of 72 units
- 1.2.1 The following technical documents have been submitted with this application;
- Full set of architectural plans
 - FRA/ Drainage Strategy
 - Transport Assessment

2.0 Site Assessment

- 2.1 The site is a small car park or storage area for the former Cooper Tire Factory. The site is tarmacked and bounded by mature hedgerow and wire fencing. Between the tarmac and the fencing to the front of the site is grass and hedgerow. To the front of the site are double metal vehicular gates and a pedestrian metal gate. At the access internally is a speed bump and existing drain.
- 2.2 To the side of the site is the River Avon. This boundary has a mature conifer tree screen, and the site cannot be seen from the bridge over the river. Between the site and the river is a footpath. The river is bounded by river grasses and plants.
- 2.3 At the access are Brant Storage signs, one replacing the existing site sign and 3 banners. Internally is an existing lighting pole. A security camera for Brant Storage has been placed on this pole.
- 2.4 Outside of the site along the footpath is a Council rubbish bin.
- 2.5 There are 20 storage units placed on site, these are individual lit by down lights which come on when the units are in use.
- 2.6 Scotland Road is a mix of residential and commercial. On the north side of the road is residential terraced housing and on the south side is commercial, which is

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bounded by a 2m brick wall. The Cooper Tire Factory has closed and the wide site in Bath Road is left empty. The factory closed in December 2023.

- 2.7 The road widens at the point of the site, which allows turning space for cars and for large vehicles. At the end of the cul-de-sac is a commercial building facing centrally onto the road, with a vehicular access.
- 2.8 The former factory is a large site, extending along Bath Road. The former factory is designated for housing, however, this site is excluded due to it being designated within a flood zone in appropriate for housing.

3.0 History of the Site

- 3.1 The site was part of the former Cooper Tires site used for car parking and storage.

4.0 Planning Policy Relevant to the Application

National Planning Policy Framework 2024

- 4.1 The objective of this policy framework is to a presumption for sustainable development. This is focused as follows;
 - a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising

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waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Making Effective Use of Land

Paragraph 124 seeks to *promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. And d) promote and support the development of under-utilised land.*

e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development

- 4.2 The proposed development is in accordance with these objectives the units are available to meet local demand, this is sustainable development as some of the units are rented by local residents who can walk to the site. The site is previously developed land, and the use is a sustainable use, with no need to alter the site in any way, the access is existing, and the hardstanding is existing. Boundary treatment is already established.
- 4.3 The land was left abandoned along with the wider site at the demise of the previous company. The use of the site for personal storage is similar to the previous use of storage and or car parking. No other change to the site is required. The units are placed on the existing tarmac. The use provides storages adjacent to residential dwellings which reduces the need to travel to out of town storage. This is a good use of the under-utilised land fully in accordance with this policy. With the proposed residential development of the former Cooper's site, the demand for storage will in fact increase.

Design

Paragraph 131 states. *The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development.*

- 4.4 The layout of the site is well designed to allow flow around the site, with lighting kept to a minimum as security lighting. There is also a security camera which feeds back to the company headquarters at Alton.

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Conserving and Enhancing the Natural Environment

Paragraph 187 seeks to *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.*

- 4.5 The proposed use is contained within the existing site boundary on existing hardstanding. The site hedgerow and tree screen will remain and the wildlife haven adjacent to the site alongside the river will be conserved, the low-level lighting will not increase significantly the existing lighting of the former factory and existing residential dwellings.

Planning and Flood Risk

Paragraph 181 states *When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.*

- 4.6 An FRA has been submitted with this application which demonstrates that the proposed development will not cause any increased flood risk off site.

Wiltshire Core Strategy

Core Policy 35 Existing employment sites

Wiltshire's Principal Employment Areas (as listed in the Area Strategies) should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these areas will be supported. The redevelopment of land or buildings currently or last used for activities falling within use classes B1, B2 and B8 must demonstrate that they meet, and will be assessed against, the following criteria

- iv. The site is not appropriate for the continuation of its present or any employment use due to a significant detriment to the environment or amenity of the area**

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- 4.7 The entire former tire factory has closed and been empty since December 2023 with no immediate prospect of re-use. It has been designated for housing, but excluding this site due to the fact that the site is within flood zone 2 and not appropriate for residential occupation. The proposed use is for non-permanent structures, and they can be removed at any time if required. This site is somewhat divorced from the main site and was used for car parking and therefore the proposed use accords with this policy.

Core Policy 15 Spatial Strategy: Melksham Community Area

Development in the Melksham Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1 Market Towns: Melksham

Market Towns Outside the Principal Settlements, Market Towns are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self-containment and viable sustainable communities

Over the plan period approximately 2,370 new homes will be provided of which about 2,240 should occur at Melksham.

- 4.8 Melksham is a development area with the proposal for a significant number of new homes required. To support these houses, as so many houses are small and lack storage space, storage units such as the proposed will be required. Therefore, the proposal is in accordance with this policy. With the proposed development the demand for storage locally will increase.

Neighbourhood Plan

Melksham Neighbourhood Plan 2020-2026

Policy 10: Employment Sites

Proposals for the retention and reuse of previously developed employment land will be supported in principle, particularly by start-up and small businesses bringing a range of new employment opportunities. The Principal Employment Areas and the central Commercial Area are shown on Figure 7.

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Proposals should seek to generate the same number, or more, permanent full time equivalent jobs as the existing or former use.

- 4.9 As stated above, the former commercial factory site has been abandoned and the proposal is to reuse the previously developed land to provide a service that is required locally, rather than leaving the land blighted.

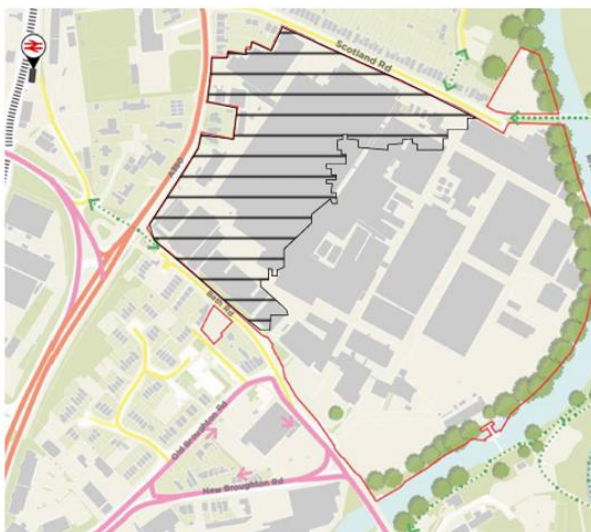
Policy 8: Infrastructure Phasing and Priorities

To ensure the sustainability of housing development, proposals must consider, assess and address their necessary infrastructure requirements and, in so far as they relate to matters within the Applicant's control, plan any related programmes of work in coordination with the housing to ensure that infrastructure keeps pace with the needs of the community.

- 4.10 The new development in the locality for housing generates a requirement for storage space. The proposal therefore meets the criteria of this policy.

Policy 7.1 Land at Cooper Tires Factory Site

Land at the former Cooper Tires main factory site, as defined in figure 6, is allocated for development of a mixed use scheme which will optimise the effective use of the site, including: a. approximately 100 dwellings in the part of the overall site which is within Flood Zone 1



The hatched area illustrates the anticipated developable area for housing taking into account Flood Zone 3. (approximate area / not to scale).

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- 4.11 The policy for the redevelopment of the site for residential is shown above, correctly excluding this site from residential use as the site is in flood zone 2 and residential accommodation would be inappropriate.
- 4.12 The use for personal storage would support this new residential development as new dwellings generally lack storage space.

5.0 Reason the Proposed Development Should Be Approved

Principle

Principle of Development and Sustainability

- 5.1 The site is Previously Developed Land PDL, therefore the principle of development is acceptable on this site. It is a brownfield site previously tarmacked to provide a parking and storage area in association with the previous commercial use by Coopers Tires and Rubber Company.
- 5.2 The proposal is a sustainable use as it is utilising an underdeveloped existing commercial storage site. The proposal is carbon neutral with no water usage and the use of solar lighting.
- 5.3 The storage units are providing much needed personal storage space. The units are placed on existing hard surfacing, and they can be removed from the site at any time with no harm to the site or the surrounding character of the area.

Justification

- 5.4 The site is currently disused and has been since the demise of the Cooper Tire Factory that finally ceased trading in December 2023. This is a small part of the larger site which wraps around Bath Road.
- 5.5 Brant Storage is an established company with headquarters in Alton. The sites are well managed with regular site inspections. There is a need for storage units in this area, an already units have been taken up with local residents. Research shows that there are two other storage operators locally, but they are not within the town area and not within walking distance as this site is.

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- 5.6 The former Cooper Tire site is allocated for residential housing, however, due to this site being within flood zone 2 it is excluded from the residential allocation. The proposed use would support the proposed housing by providing storage space close at hand. As this is part retrospect, some of the units are already rented by residents of Scotland Road.

Layout and Design

- 5.7 The layout of the site is ergonomically designed for easy access to the individual storage containers. They are set out in rows, on concrete bases, laid on the existing tarmac. The containers are all green to blend into the landscape. The site is overlooked by the side windows of the adjacent residential house, but use of the units does not cause any overlooking to the residential dwelling.
- 5.8 The storage containers are of the specification required by national standards for residential storage.

Access and Parking

- 5.9 A Transport Statement has been submitted with this application. The site has an existing vehicular and pedestrian access directly onto Scotland Road. The site is enclosed with existing wire fencing with metal vehicular double gates and a single pedestrian gate which open into the site off the highway.
- 5.10 The site is at the hammerhead of the road where there is room for cars and large vehicles, including refuse trucks to turn. A swept path plan demonstrates this is safely achieved. The analysis states that the proposed development would generate 2 additional two way trips which is negligible impact on the highway network.
- 5.11 There is a speed bump within the site. The design of the site is to provide a flow around the site. The nature of the business is such that clients would drive up to rented units to either drop off or pick up stored items. Therefore, dedicated parking spaces are not necessary. Two parking spaces have been provided to accommodate visitor or short-stay vehicles.

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- 5.12 Emergency access requirements are met in accordance with Building Regulations Part B. Site waste would be minimal and privately collected.

Lighting

- 5.13 The only proposed lighting is as existing security lighting, as shown on the plans. The lighting is solar powered. There is no permanent lighting proposed. The lighting will comply with ALP GN01:2021 obtrusive-light limits identified as E2/E3 of the Lighting Engineers Lighting Design Guidelines.

Flooding and Drainage

- 5.14 An FRA has been submitted with this application which states *The site is currently served by positive drainage infrastructure via an existing road gully and **Highway Drainage** The Wessex Water records confirm Scotland Road is drained by road gullies both sides, which drain to a highway drain shown to be flowing in an easterly direction and discharging to the Main River to drain to the Main River to the east boundary.*
- 5.15 The FRA identifies the site within flood zone 2 where *The type of development falls within the “Less Vulnerable” (storage & distribution/car park) flood risk vulnerability classification (Annex 3: Flood risk vulnerability classification, NPPF) and is appropriate in Flood Zone As detailed above “Less Vulnerable” development is appropriate in Flood Zones 2, and application of the exception test is not required.*
- 5.16 In summary, *the completion of the development will not increase flood risk on or off the site. In conclusion, this development is suitable with regards to flood risk and surface water drainage.*

Landscaping

- 5.17 The site is contained within a hedgerow and tree screening along the boundary with the River Avon. The landscaping will be retained and where possible, enhanced. The adjacent riverbank has a variety of river planting.

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- 5.18 To the front of the site is a footbridge over the river, this is a pleasant environmental walk. When looking back into the site, the screening is such that the site cannot be seen. The placement of these containers does not adversely affect the landscaping of the site in any way.

Ecology

- 5.19 The riverbank is rich in ecology, and this will not be disturbed as a result of the proposed development. At this point of the river, the footbridge is constantly in use by dog walkers. The containers will not be in constant use, and lighting is restricted to down lighting on the units and only used as security lighting with no proposed constant lighting, only when the units are in use. In any case there is existing lighting on the side elevation of the residential dwelling overlooking the river.

Refuse

- 5.20 Refuse bins are located on the site as shown on the site plans and there is a Council public refuse bin which is outside of the site, but as part of the application, the Applicant has agreed to upgrade this in association with the Parish Council to their requirements. Owners will take away their own rubbish and internal bins will be monitored and removed by the management team.

Site Management

- 5.19 The site has security cameras located on the existing lighting pole in the centre of the site. This is monitored at the headquarters in Alton. The site is managed by a local caretaker who visits the site on a weekly basis to tidy the site and put the bins out for the pavement collection. There are also night patrols to monitor the site.

6.0 Conclusion

- 6.1 The site is Previously Developed Land which is totally enclosed and with existing hardstanding and wire fencing. The proposed use is a good use of the existing facilities of the site with no hard landscaping required.
- 6.2 The former Cooper site is allocated for housing, however, this site is excluded rightly so as it is in flood zone 2. Therefore, the proposed storage facility would be

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a sustainable form of development providing storage space for the new housing as well as those existing in Scotland Road. The Submitted FRA demonstrates that the proposed use is suitable for the site as it is a less vulnerable use and will not cause any flood offsite.

- 6.3 There is a need for personal storage within the locality. The new proposed housing in Melksham will bring more demand for such storage within the town, and this is a perfect location for this service.
- 6.4 The site utilises the existing access and is easily accessed as demonstrated in the Transport Assessment. Bin storage is proposed and easily collected at the street side in accordance with refuse collection requirements.
- 6.5 The site is managed by a roving site manager and by security cameras operated at the headquarters, as well as nightly surveillance.
- 6.6 Given that the proposed development does not cause any demonstrable harm but provides a much-needed facility in the locality, we would respectfully request that this application is approved without delay.