

## **Second Supplementary Report**

**Planning and Development Board - 9 June 2025**

**Land to the south of Watling Street, Caldecote, CV10 0TS**

**Outline planning permission for extension to MIRA Technology Park to comprise employment use (Class B2); associated office and service uses (Class E (g)), storage (Class B8), new spine road, car parking, landscaping and enabling works for**

**ERI MTP Ltd**

### **1. Introduction**

1.1 This matter appears on the main agenda.

1.2 Members will recall that a subsequent Supplementary Report was then circulated which included a Highway Technical Note entitled “Updated Review of A5 Mitigation” submitted by the objector.

### **2. Further Update**

2.1 Following publication of the main report, the objector has submitted a response. This is at Appendix A. It refers to the officer report and also provides additional information in respect of evidencing the objector’s case which concludes that 75% of vehicles accessing his premises will experience longer journey times and thereby confirming his view that the proposals at the Drayton Lane junction would give rise to “unreasonable restrictions” on his business.

### **3. Observations**

3.1 It is not considered that the letter raises any new points in respect of the legality of the decision.

3.2 Members are asked to treat the additional information in the Appendix together with that which has already been reported in respect of the “agent of change” matter as a whole. The Council has not said that there would be no impact on the business, particularly in the short term, and the additional information does not alter that conclusion.

3.3 The Council are asked to assess the scheme and have considered that any impact on a private business does not result in a material impact that amounts to a planning harm. It is considered that the extent to which it is alleged that the scheme will compromise the business has been overstated. But even if the impact has been properly stated and this was considered to be a planning harm, it is not considered that this harm justifies the refusal of planning permission. Moreover, even if there was an alternative scheme, it is not considered that the existence of an alternative (which would be a material consideration) would justify the refusal of planning permission.

3.4 It follows that even if the objector is correct that there is an alternative scheme, that the extent of impact on the business is properly stated and amounts to a planning harm

(which would compromise economic productivity and offend against paragraph 85 of the NPPF and should be afforded significant weight), that approval of the scheme would offend against paragraph 200 of the NPPF by imposing unreasonable restrictions on the business and finally that this all would make the scheme contrary to the development plan, officers would still be recommending that these harms do not justify the refusal of planning permission as a matter of planning judgment.

### **Recommendation**

That planning permission be granted subject to the conditions and the completion of the Section 106 Agreement as previously set out in earlier reports.

Sofia Ali  
Head of Legal Services and Data Protection  
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**Date:** 5 June 2025

**Our ref:** VL/EXT00001/00014

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By email only to: [sofiaali@northwarks.gov.uk](mailto:sofiaali@northwarks.gov.uk)

Dear Sirs

Site: MIRA Technology Park South Site  
Planning Application: PAP/2022/0423  
The Applicant: ERI MTP Ltd  
Our Client: Extra Room Self Storage & Drayton Grange Farm

We refer to the Officer's report and supplementary report to the Planning Board's June 2025 meeting in respect of the Planning Application. Our Client is extremely disappointed by the Officer's recommendation that planning permission should be granted without allowing National Highways sufficient time to review Our Client's alternative highways solution.

### **Economic Harm**

As set out in detail in the financial forecasts from 23 December 2024, the Applicant's highway mitigation proposals to restrict the A5/Drayton Lane Junction to a left-in and left-out turn only ("the Drayton Lane Restrictions") will cause considerable economic harm to Our Client's business contrary to paragraph 200 of the NPPF.

To further demonstrate the extent of the harm and to address comments made in the Officer's Report to the February Board, Our Client commissioned two separate traffic surveys at Drayton Grange Farm and Drayton Barns over two 7 day periods: from Friday, 7 February to Thursday, 13 February, and from Saturday, 26 April to Friday, 2 May 2025. These surveys recorded an average of 932 vehicles entering the two sites from Drayton Lane, equating to an average of 133 vehicles per day. A copy of the location of the traffic counters is attached to this letter.

In a note from the Applicant dated 20 January 2025, the Applicant estimated the diversion impact based on assumed trip numbers and traffic origin-destination splits. Our Client has replicated this methodology using the traffic survey data and the traffic origin-destination split based on a detailed analysis of its customer base. The results are attached to this letter and in summary, demonstrate:

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- 100 vehicle trips per day will be diverted
- A total weekly diversion distance of **2,394km** (1,488 miles)
- An annual diversion distance of **124,495km** (77,358 miles)

The annual diversion amounts to:

- **2,102 hours** of additional journey time
- **8,756** litres of additional fuel
- **17,417kg** of additional CO2 emissions

An analysis of Our Client's customer base confirms that 75% of vehicles accessing its premises will experience longer journey times as a result of the Applicant's highway proposals. It is worth re-emphasising that Our Client's business relies heavily on ease of access. Many storage customers are short term and the business must attract approximately 100 new customers each month to maintain occupancy levels. Any reduction in accessibility and increasing customer journey times or costs will inevitably hinder customer acquisition.

### **Necessity of the Drayton Lane Restrictions**

Contrary to the previous Officer's Report, the latest Report expressly recognises that the Drayton Lane Restrictions may well not be necessary<sup>1</sup>. In these circumstances, and where at least some economic harm is accepted by officers, there is no rational basis on which the Drayton Lane Restrictions could be said to be 'not unreasonable' under paragraph 200 of the NPPF.

Irrespective of paragraph 200 of the NPPF, given that there is an alternative highways solution (that officers are recommending be ignored), allowing a development to cause unnecessary harm to Our Client's business would be contrary to para 85 of the NPPF which emphasises the need to place significant weight on the need to support economic growth and productivity, including taking into account local business needs.

These errors can easily be avoided by allowing National Highways sufficient time to assess Our Client's alternative highways solution submitted to the Council on 27 May 2025 (something National Highways previously said could be done in a matter of days). Once the assessment has been carried out, the planning permission and s.106 agreement can be amended accordingly. Such an amendment would be minimal and should take very little time to incorporate.

### **Conclusion**

For the past 20 years, Our Client has benefitted from unrestricted access to the A5 in both directions and has developed a successful self-storage business because of it. The Drayton Lane Restrictions will cut off half of Our Client's access to the A5 by closing the right turn into Drayton Lane and out of Drayton Lane and will have a severe impact on their businesses.

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<sup>1</sup> Para 4.7

Our Client has consistently demonstrated its willingness to work with the Council and the Applicant to achieve a solution that works for all parties and respectfully implores the Board to allow National Highways sufficient time to assess the alternative highways solution.

Please acknowledge receipt. An email to the address below will suffice.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Victoria Longmore'.

For and on behalf of Ladders Solicitors LLP

**Tel** 01789 206119

**E** [victoria.longmore@ladders.co.uk](mailto:victoria.longmore@ladders.co.uk)

cc.

1. Jeff Brown (Case Officer) - [JeffBrown@NorthWarks.gov.uk](mailto:JeffBrown@NorthWarks.gov.uk)

Enc. – Diversion Impact Assessment

# **Diversion Impact Assessment**

## **1. Introduction**

- Two separate traffic surveys were commissioned by Extra Room Self Storage for its sites at **Drayton Grange Farm** and **Drayton Barns** on Drayton Lane
- The surveys were carried out by Auto Surveys Limited, over two 7-day periods: from **Friday, 7 February to Thursday, 13 February**, and from **Saturday, 26 April to Friday, 2 May**
- The locations of the traffic counters used are shown in Appendix B
- Across the two surveys, an average of **932** vehicles were recorded entering the sites each week, equivalent to approximately **133 vehicles per day**

## **2. The Vast Majority (75%) of Trips Are Affected**

- Analysis of Extra Room Self Storage's customer base shows that 75% of vehicles accessing the sites would experience longer journeys under the Applicant's highway proposals
- This conservatively assumes that all vehicles approaching from the east along the A5 opt for the shorter but less convenient route through Fenny Drayton village, rather than detouring 3.5km to the Mancetter roundabout to U-turn and re-approach via a left turn into Drayton Lane from the A5
- Whilst the village route avoids the detour, it is convoluted and less direct and convenient than the current right turn access into Drayton Lane from the A5

## **3. Diversion Impact in Numbers**

- In a note dated, 20 January 2025, the Applicant estimated the diversion impacts using assumed trip numbers and traffic origin-destination splits
- Extra Room Self Storage has replicated this methodology using actual traffic survey data and the actual split based on detailed analysis of the customer base
- The results are summarized in Appendix A. The summary impact on home and business customer journeys as a consequence of the Applicant's development are as follows:
  - **100 trips per day** will be affected
  - A weekly diversion totalling **2,394km** (1,488 miles)
  - An annual diversion totalling **124,495km** (77,358 miles)

These annual diversions amount to:

- **2,102 hours** of additional journey time
- **8,756 litres** of additional fuel\*
- **17,417Kg** of additional CO2 emissions\*

*\* Source: OpenCO2.net*

## Appendix A - February 2025 data

### 1. TRIPS TO EXTRA ROOM SELF STORAGE

Origin	Example Source	% split	No. Trips Per Week	Distance (km)		Journey Time (mins)		Total Distance (km) per week		Total Journey Time (mins) per week		Total Distance (kms) per annum		Total Journey Time (mins) per annum	
				Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
NORTH	Bridge Farm Nursery, Twyross Road CV13 6LB	3.1%	27	4.9	4.9	0	6	132	132	161	161	6,847	6,847	8,384	8,384
EAST	Banomi (UK) (The Fluid Centre), Watling St CV11 6BQ	22.5%	198	6.2	6.2	0	7	1,228	1,228	1,387	1,585	63,861	63,861	72,101	82,401
SOUTH 1 - A444	St James Church Hall, Weddington CV10 0EY	14.4%	126	5.5	6.9	1.4	7	695	873	885	1,138	36,166	45,372	46,029	59,180
SOUTH 2 - Woodford Lane	Onyx Joinery, Unit 1, The Green, Hartshill, Nuneaton CV10 0SL	19.0%	167	3.5	6.9	3.4	5	585	1,152	835	1,336	30,397	59,926	43,425	69,479
WEST	Atherstone, Red Lion CV9 1BB	41.1%	362	4.6	4.6	0	7	1,667	1,667	2,537	2,537	86,706	86,706	131,944	131,944
COMBINED RESULTS (ALL DIRECTIONS)															
TOTALS ->				4,307		5,052		745		6,757		223,977		301,882	
INCREASE IN TIME / DISTANCE ->										952		38,735		49,506	

### 2. TRIPS FROM EXTRA ROOM SELF STORAGE

Destination	Example Source	% split	No. Trips Per Week	Distance (km)		Journey Time (mins)		Total Distance (km) per week		Total Journey Time (mins) per week		Total Distance (kms) per annum		Total Journey Time (mins) per annum	
				Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
NORTH	Bridge Farm Nursery, Twyross Road CV13 6LB	3.1%	27	4.9	4.9	0	6	132	132	161	161	6,847	6,847	8,384	8,384
EAST	Banomi (UK) (The Fluid Centre), Watling St CV11 6BQ	22.5%	198	6.2	6.2	0	7	1,228	1,228	1,387	1,387	63,861	63,861	72,101	72,101
SOUTH 1 - A444	St James Church Hall, Weddington CV10 0EY	14.4%	126	5.6	7	1.4	9	708	885	885	1,138	36,823	46,029	46,029	59,180
SOUTH 2 - Woodford Lane	Onyx Joinery, Unit 1, The Green, Hartshill, Nuneaton CV10 0SL	19.0%	167	3.5	3.5	0	5	585	585	835	835	30,397	30,397	43,425	43,425
WEST	Atherstone, Red Lion CV9 1BB	41.1%	362	4.3	8	3.7	10	1,559	2,900	2,537	3,625	81,051	150,793	131,944	188,491
COMBINED RESULTS (ALL DIRECTIONS)															
TOTALS ---->				4,211		5,729		1,518		7,146		218,979		301,882	
INCREASE IN TIME / DISTANCE ->										1,340		78,948		69,699	

### 3. TWO WAY TRIPS TO / FROM (COMBINED)

TOTALS ---->				8,518		10,782		2,263		13,903		442,956		603,765	
INCREASE IN TIME / DISTANCE ->										2,292		117,682		119,205	

## Appendix A - April 2025 data

1. TRIPS TO EXTRA ROOM SELF STORAGE																			
Origin	Example Source	% split	No. Trips Per Week	Distance (Km)			Journey Time (mins)		Total Distance (Km) per week		Total Journey Time (mins) per week		Total Distance (kms) per annum		Total Journey Time (mins) per annum				
				Existing	Proposed	Increase	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed					
NORTH	Bridge Farm Nursery, Twygrass Road CV13 6LB	3.1%	30	4.9	4.9	0	6	6	147	147	180	180	7,639	7,639	9,354	9,354			
EAST	Banomi (UK) (The Fluid Centre), Watling St CV11 6BQ	22.5%	221	6.2	6.2	0	7	8	1,370	1,370	1,547	1,768	71,255	71,255	80,449	91,942			
SOUTH 1 - A444	St James Church Hall, Weddington CV10 0EY	14.4%	141	5.5	6.9	1.4	7	9	776	974	988	1,270	40,353	50,625	51,358	66,032			
SOUTH 2 - Woodford Lane	Onyx Joinery, Unit 1, The Green, Hartshill, Nuneaton CV10 0SL	19.0%	186	3.5	6.9	3.4	5	8	652	1,286	932	1,491	33,916	66,864	48,452	77,523			
WEST	Atherstone, Red Lion CV9 1BB	41.1%	404	4.6	4.6	0	7	7	1,860	1,860	2,831	2,831	96,745	96,745	147,220	147,220			
				COMBINED RESULTS (ALL DIRECTIONS)															
				TOTALS -->				4,806		5,637		6,478		7,540		293,127		392,071	
				INCREASE IN TIME / DISTANCE -->				831				1,062		43,219		55,238			
Destination	Example Source	% split	No. Trips Per Week	Distance (Km)			Journey Time (mins)		Total Distance (Km) per week		Total Journey Time (mins) per week		Total Distance (kms) per annum		Total Journey Time (mins) per annum				
				Existing	Proposed	Increase	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed					
NORTH	Bridge Farm Nursery, Twygrass Road CV13 6LB	3.1%	30	4.9	4.9	0	6	6	147	147	180	180	7,639	7,639	9,354	9,354			
EAST	Banomi (UK) (The Fluid Centre), Watling St CV11 6BQ	22.5%	221	6.2	6.2	0	7	7	1,370	1,370	1,547	1,547	71,255	71,255	80,449	80,449			
SOUTH 1 - A444	St James Church Hall, Weddington CV10 0EY	14.4%	141	5.6	7	1.4	7	9	988	988	988	1,270	41,087	51,358	51,358	66,032			
SOUTH 2 - Woodford Lane	Onyx Joinery, Unit 1, The Green, Hartshill, Nuneaton CV10 0SL	19.0%	186	3.5	3.5	0	5	5	652	652	932	932	33,916	33,916	48,452	48,452			
WEST	Atherstone, Red Lion CV9 1BB	41.1%	404	4.3	8	3.7	7	10	3,236	3,236	2,831	4,045	90,435	168,252	147,220	210,314			
				COMBINED RESULTS (ALL DIRECTIONS)															
				TOTALS -->				4,699		6,393		6,478		7,973		332,420		414,602	
				INCREASE IN TIME / DISTANCE -->				1,694				1,496		88,088		77,768			
3. TWO WAY TRIPS TO / FROM (COMBINED)																			
				TOTALS -->				9,505		12,030		12,955		15,513		625,548		806,673	
				INCREASE IN TIME / DISTANCE -->				2,525				2,558		131,307		133,006			



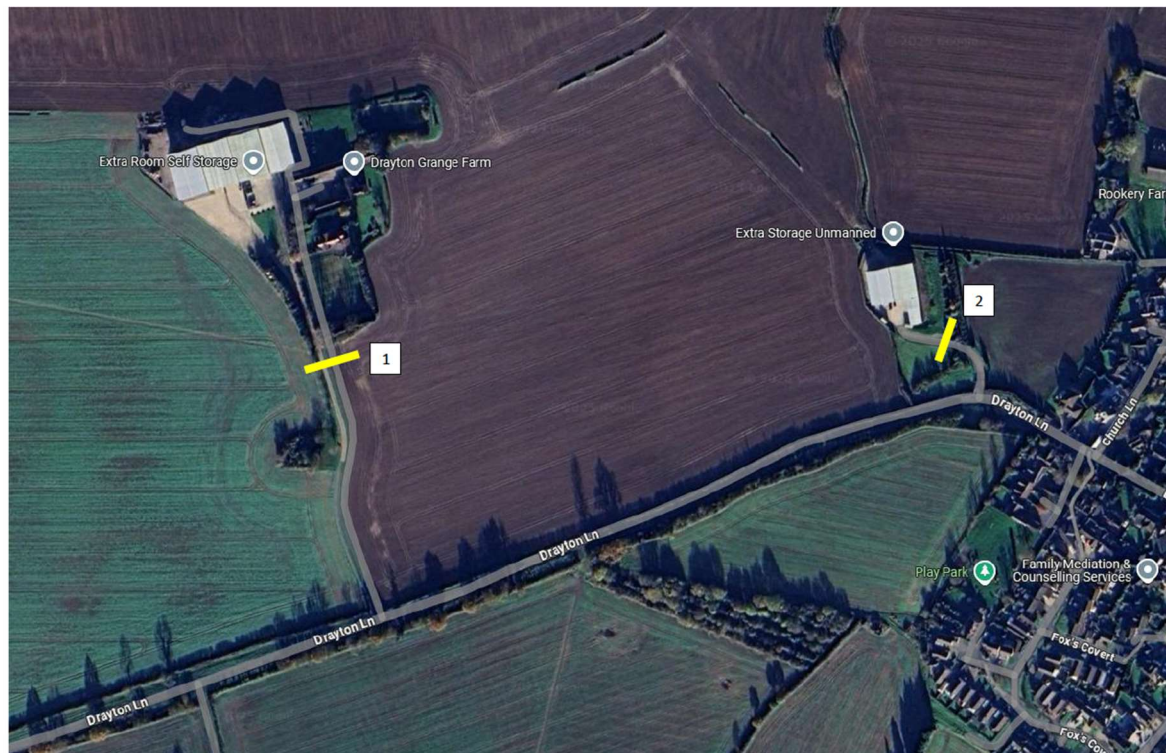
## Appendix B

Location of traffic counters shown in yellow below:

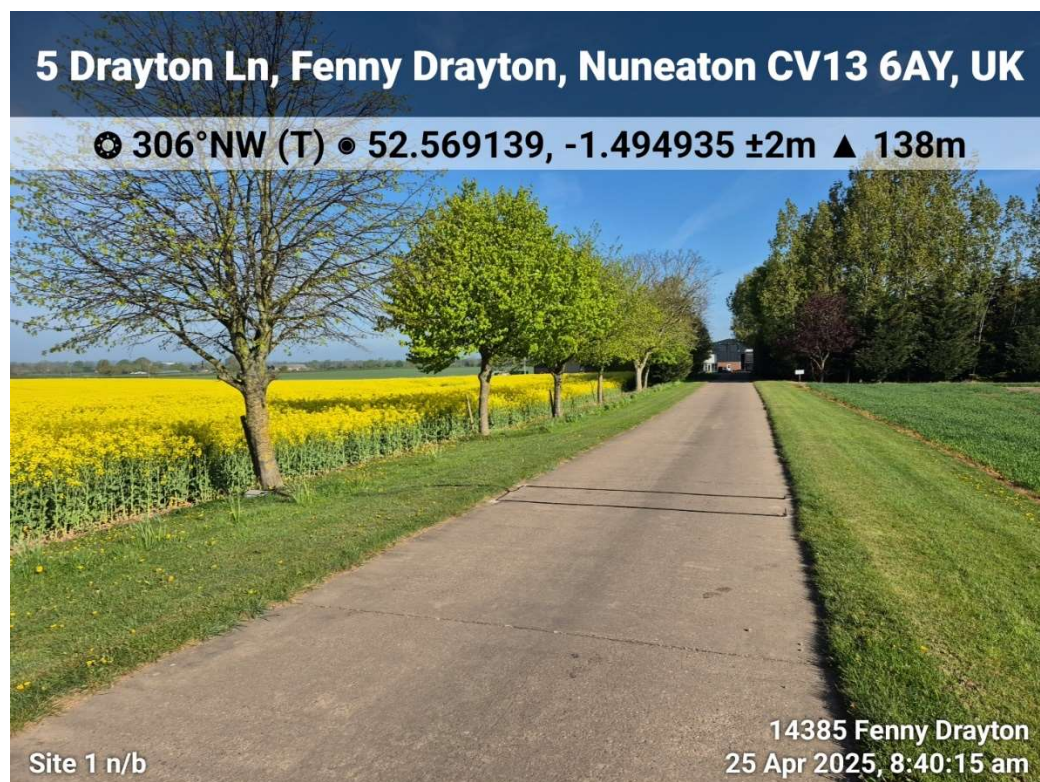
Site 1 - 52.569414, -1.494970

FENNY DRAYTON

Site 2 - 52.569695, -1.487911



### Drayton Grange Farm



### Drayton Barns

