

Planning Statement – March 2023

Unit 3 Peacock Trading Estate, Goodwood Road, Eastleigh, SO50 4NT

***Proposed Change of Use from B2 (General Industrial)/B8 (Storage & distribution) to
Sui Generic Funeral Directors Facility (to include 24hr access)***



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1.0 INTRODUCTION

This statement is submitted in respect of an application for full planning permission for the Change of Use from B2 (General Industrial) to the Sui Generic Use Class of Funeral Directors Facility (to include 24hr access). The application building is currently occupied by “Parkway Interiors” a furniture manufacturer and has an assumed B2 Use Class (General Industrial).

2.0 SITE

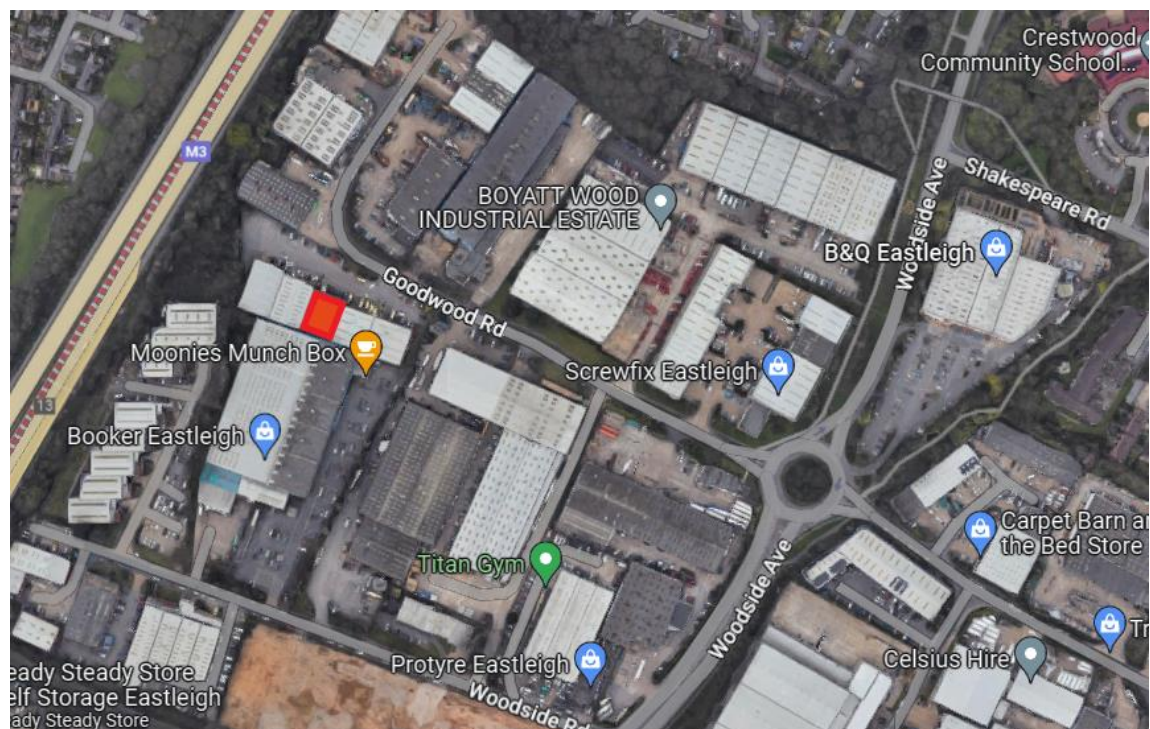
The application site is located on Goodwood Road on the established Peacock Trading Estate which is accessed via Woodside Lane and sits within the larger Boyatt Wood Industrial Estate. The Boyatt Wood Industrial Estate is made up of a number of Trading Estates such as the Peacock Trading Estate, St Georges Industrial Estate, Stanstead Road Trade Park, etc with the whole estate characterised by commercial units of varying sizes and used as offices, light and general industrial uses, and storage (E, B2 & B8). The estate has excellent North/South road links via Leigh Road to Junction 13 of the M3 Motorway and then East/West via Junction 4 of the M27 Motorway.

The application property is the central unit in a terrace of 5 industrial/warehouse units constructed of traditional steel portal frames with brick & profiled sheet cladding elevations. To the front the property has a main entrance door, loading bay roller shutter door and windows for the ground-floor accommodation. The rear elevation has a single fire exit door and faces the boundary with the Woodside Road Industrial Estate. Hardstanding and parking areas are located to the front of the building.

Site Location Plan - Application building is outlined in red



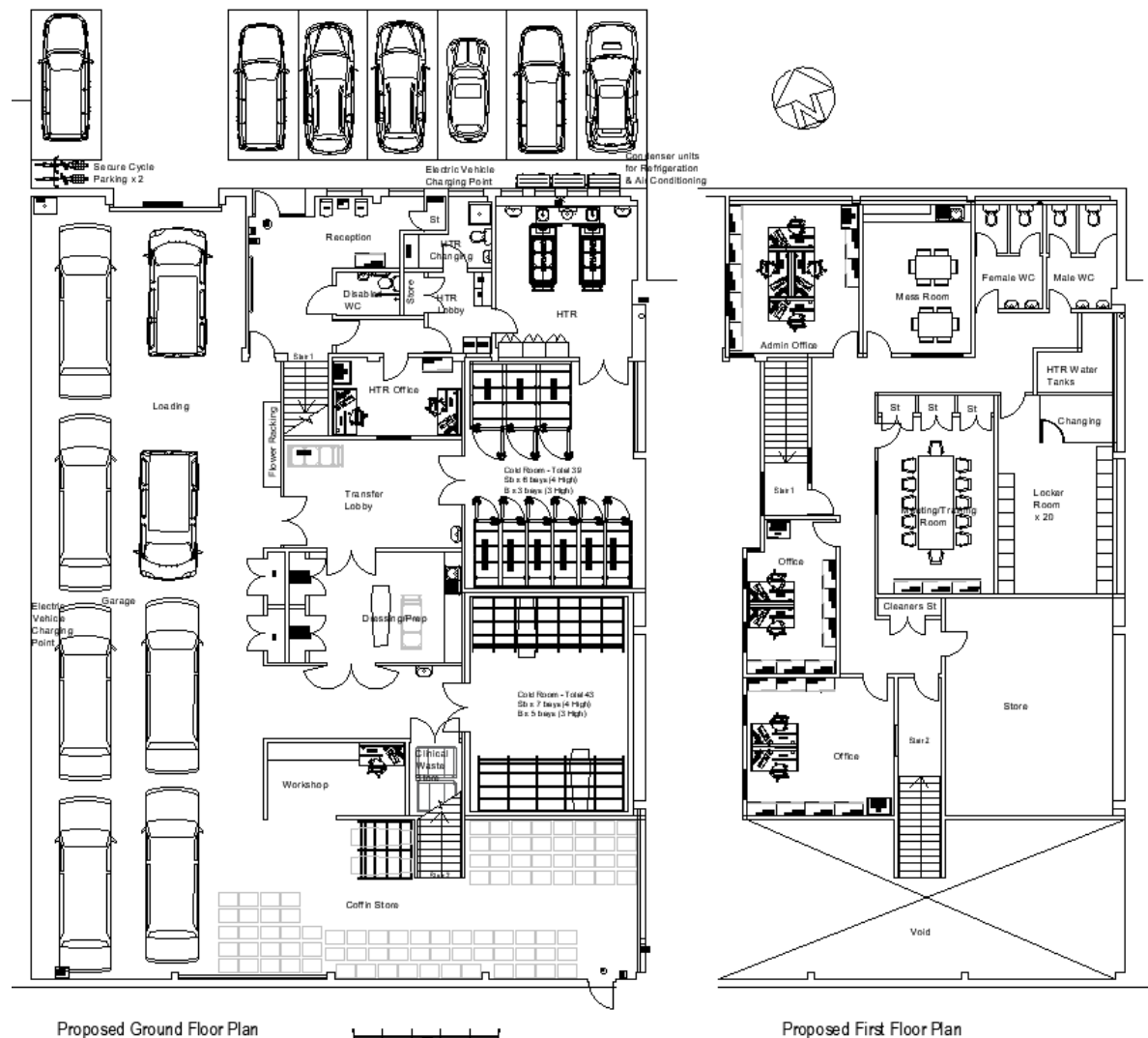
Aerial View of the site - Application building hatched in red



3.0 THE PROPOSED DEVELOPMENT

The application seeks consent for a change of use of the existing B2 building to a Sui Generis Funeral Directors Facility. There are minimal external alterations proposed consisting of wall mounted air conditioning & fridge condenser units to the front elevation. The site will house the offices, storage and distribution hub for Dignity Funeral's Southampton Care Facility which is being relocated to the application site from its existing Town Centre location at Beestons Funeral Directors, 13/15 Warren Ave, Shirley Warren, Southampton SO16 6AS. The site will service approximately seven A1 Use Class Funeral Directors Shops within the local vicinity.

Proposed Floor Plans



4.0 PLANNING POLICY

In addition to the National Planning Policy Framework and the National Planning Practice Guidance, the following local policies and guidance are relevant to the determination of this Change of Use.

Eastleigh Borough Local Plan (2016-2036) - Adopted April 2022

Strategic policy S1: Delivering sustainable development;

Strategic Policy S4: Employment provision;

Policy DM13: General development criteria – transport;

Policy DM15: Safeguarding existing employment sites;

Policy DM16: Workforce training requirements and new jobs.

Strategic policy S1: Delivering sustainable development

To be sustainable, new development in the Borough should:

- a. meet community needs without compromising the identity of the Borough or its individual settlements, or the ability of future generations to meet their own needs;*
- b. enhance social equality by ensuring equal and easy access to a range of community facilities and services and by promoting the development of employment, education and skills training opportunities;*
- c. maintain and help to grow a high-performing local economy that benefits the Borough, south Hampshire and the wider economy, without adverse impact on south Hampshire's city, town and other centres, the quality of the local environment or local transport networks;*
- d. have regard to the potential impacts of climate change, and the need to limit greenhouse gas emissions including through carbon sequestration and by promoting measures to design buildings and spaces which are adaptable to predicted climate change, and restrict development in areas at risk from flooding, minimise energy use and encourage the generation of renewable energy, and by minimising emissions from motorised transport, industrial activity and domestic uses;*
- e. minimise the need to travel longer distances and, where travel is necessary, prioritise more sustainable forms of transport, such as active travel, other alternatives to car use, or a combination of active travel and other alternatives to car use;*
- g. seek opportunities to optimise density of new development and redevelopments;*
- h. use resources wisely and minimise the generation of waste in the construction, occupation and use of buildings;*

Strategic Policy S4: Employment provision

To contribute towards sustainable economic growth, provision will be made for additional floorspace for uses in the B2, B8 and E(g) use classes and other employment-generating uses through:

- d. new employment development within the urban edge and by the re-use and/or redevelopment of buildings in the countryside (policies DM18 and DM19, Chapter 5);*
- e. retaining existing (and allocated) employment sites which have the potential to contribute towards future employment needs, and intensifying their use (see policy DM15, Chapter 5);*

Policy DM13: General development criteria - transport

All new development must have safe and convenient access to the highway network and make provision for access to, and by, other transport modes including public transport and cycle and pedestrian routes as appropriate. Access arrangements to the highway network must:

- a. meet national and local guidance and standards with all highway improvements meeting the standard required to be adopted by the Highway Authority;*
- b. not cause or increase danger to road users or have a significant detrimental impact on the operation or safety of the highway network; and*
- c. be provided without unacceptable environmental impact.*

Policy DM14: Parking

Non-residential parking standards for Eastleigh Borough Council are set out in the Hampshire County Council “Hampshire Parking Strategy and Standards 2002”

Policy DM15: Safeguarding existing employment sites

- 1. The major existing employment sites as identified on the policies map shall be retained predominantly in employment use classes B2, B8 and E(g). Within these sites the Borough Council will permit:*
 - a. the redevelopment and intensification of use of sites for Use Class B2, B8 and E(g)(ii)/(iii) employment uses;*
 - b. changes of use between use classes B2, B8 and E(g)(ii)/(iii); and*
 - c. workforce training opportunities as defined in policy DM16 below; subject to the general development criteria and transport policies of this Local Plan including the impact on residential areas.*
- 2. Exceptionally, employment uses other than those in use classes B2, B8 or E(g)(ii)/(iii) (but not E(a)/(b)/(c) uses or pubs, drinking establishments or hot food takeaways) may be permitted on these sites provided that:*
 - a. they would not have a significant impact on the continued primary use of the site*
 - b. the existing site is causing, or could cause, significant harm to highway safety or to the amenities of the area or to local residents*
- 3. The redevelopment or change of use of other existing employment sites not identified on the policies map currently in class B2, B8 or E(g)(ii)/(iii) uses to non-employment uses, where this is not permitted development, will be permitted provided that it can be demonstrated that the site is no longer in demand for employment use and that criteria a. and b. above are satisfied.*

Policy DM16: Workforce training requirements and new jobs

- 1. The provision of workforce training activities will normally be permitted on employment sites where they:*
 - a. are related to employment uses on that site; and/or*
 - b. contribute to improving workforce skills for the Borough.*

5.0 PLANNING ASSESSMENT

From the aforementioned planning policy references, it can be seen that the main issues to consider in determining the application are:

- 1) The loss of the existing B2 Use Class on an existing Employment Site.**
- 2) The proposed scheme's impact on Employment levels and any subsequent impact on parking.**

The current applications compliance with the Planning Policies referred to in Section 4 are demonstrated as follows:

1) The loss of the existing B2 Use Class within an existing Employment Site

Extract from the Policies Map (North) of the Adopted Eastleigh Borough Local Plan 2016-2036 - Adopted April 2022 showing the application site building outlined in red.



From the above Policies Map (North) it can be seen that the application site is not specifically identified as a “Major Existing Employment Site.” However, the application building (outlined in red) sits centrally within the large Boyatt Wood Industrial Estate area which is an Existing Employment Site.

The application proposes a change of use from B2 General Industrial Use to a Sui Generis Funeral Directors Facility Use. A Funeral Directors Facility does not fall into the category of any specific Use Class however the processes, activities and employment levels proposed for the site are in line with the current B2 Use Class.

The Sui Generis Use proposed for the site should not be confused with the Class E Commercial, Business & Service (previously A1) Funeral Directors Shops which are generally located in a town centre or shopping parade location. The primary role of an E Class (A1)

Funeral Directors Shop, is to provide a location for the public to visit to arrange a funeral, purchase a funeral plan/memorials and visit a deceased person in a Chapel of Rest. With staffing levels averaging a single full-time member of staff.

Policies S4 & DM15 of the Eastleigh Borough Local Plan (2016-2036) - Adopted April 2022 sets out that the land within the identified “Major Existing Employment Sites” should be retained predominantly for employment purposes. The redevelopment or change of use of other existing employment sites not identified on the policies map currently in class B2, B8 or E(g)(ii)/(iii) may be considered for change of use to non-employment uses, however an Employment Use is preferred.

The proposed development, as a Sui Generis Use, although not an established E(g)/B2/B8 Use, does technically accord with these policies as the nature and operation of the facility is directly comparable to that of a B2 (General Industrial) Use. Furthermore, due to the scale and size of the operations and subsequent space requirements an industrial estate location is likely to be the only area in which they can realistically be accommodated. In other respects, the employment density matrix is directly comparable to that of a standard B2 facility & there would be no net loss of jobs in comparison to an alternative use of the site.

The proposed Sui Generis Use for the Funeral Directors Facility covers all aspects contained within the existing B2 Use and therefore the proposed change of use should not be considered as a loss of this Use to the building, site or surrounding areas and proposes a typical mix of the following processes and uses:

The site is a proposed relocation for the existing Town Centre Funeral Directors Facility currently located at Beestons Funeral Directors 13/15 Warren Ave, Shirley Warren, Southampton, SO16 6AS. The business has been served a Section 25 to vacate this address (by the Freeholder) and is being forced to relocate. The care of deceased, vehicle storage and administration offices are to be relocated to the application site whilst a new Town Centre A1 shop unit will house the Client/public facing Funeral Directors Shop. Consequently, an Industrial Unit will be better suited to the care of deceased requirements for the volume of funerals provided. In addition, the good transport access links of the application site mean that this is a more sustainable location.

The site will serve as Dignity Funeral’s Southampton Care Facility and in addition to the care of deceased facilities will house the offices for the logistics, staffing, administration, payroll, etc for the Seven local A1 Funeral Directors Shops that the site will service. A training/meeting room will also be provided to train not only staff working out of the application site but other staff located within the Southampton & wider Hampshire and Dorset Areas which is in line with Policy DM16: (Workforce training requirements and new jobs) of the Eastleigh Borough Local Plan (2016-2036) - Adopted April 2022.

The application proposes refrigerated storage for approximately 82 deceased persons. This volume of cold storage is required, not only due to the number of deaths in the area, but the time lapse from the date of death to the date of a funeral (which can be a few weeks) and as such a deceased person needs to be stored for some length of time. To locate the refrigerated storage within an industrial unit, such as the application site, allows the deceased to be stored for longer and in Health & Safety compliant conditions. Due to the large volume of funerals serviced by the site storage for a large number of coffins are also required. Coffins are delivered to the site on a monthly basis direct from the factory. The proposals include garaging for six funeral vehicles which are a mix of hearses and limousines. In addition, the business will be operating two Private Ambulances with internal

garage/loading space provided. The Ambulances collect from homes and hospitals, etc and transport the deceased to the proposed facility for preparation for the Funeral. The private ambulances also distribute deceased to the A1 Funeral Shops for viewing and for funerals departing from the Funeral Shops.

From the afore mentioned information, it can be seen that the proposed development, although a Sui Generic Use, will preserve the qualities of the existing B2 Use and therefore accords with policies relating to the Major Existing Employment Sites & Existing Employment Sites. The proposed facility will service in excess of 1000 funerals/per year and as such is on a scale that would be beyond the remit or capability of any A1 Funeral Directors shop. As such an industrial location, such as the application site, is the most suitable location for the business use. There is to be no public access to the site with the only visitors to the site being members of staff and Doctors for visits pertaining to Death Certificates.

2) The scheme's impact on Employment levels and any subsequent impact on Parking;

The site is currently occupied by Parkway Interiors however, their employment levels are unknown. In order to establish the impact on Employment Levels the proposed employment levels have been compared to the employment numbers indicated within the Homes & Communities Agency 2015 Employment Density Guide 3rd Edition Table 4. Employment Density Matrix as shown below. Where Employment density refers to the average floorspace (in m²) per full-time equivalent (FTE) member of staff.

4. Employment density matrix

Use Class	Sub-Category	Sub-Sector	Density (sqm)	Notes
B1a Offices	General Office	Corporate	13	NIA
		Professional Services	12	NIA
		Public Sector	12	NIA
		TMT	11	NIA
		Finance & Insurance	10	NIA
	Call Centres		8	NIA
B1b	R&D Space		40-60	NIA lower densities will be achieved in units with higher provision of shared or communal spaces
B1c	Light Industrial		47	NIA
B2	Industrial & Manufacturing		36	GIA
B8	Storage & Distribution	National Distribution Centre	95	GEA
		Regional Distribution Centre	77	GEA
		'Final Mile' Distribution Centre	70	GEA
Mixed B Class	Small Business Workspace	Incubator	30-60	B1a, B1b – the density will relate to balance between spaces, as the share of B1a increases so too will employment densities.
		Maker Spaces	15-40	B1c, B2, B8 - Difference between 'planned space' density and utilisation due to membership model
		Studio	20-40	B1c, B8
		Co-Working	10-15	B1a - Difference between 'planned space' density and utilisation due to membership model
		Managed Workspace	12-47	B1a, b, c
B8 / Sui Generis	Data Centres	Wholesale	200-950	
		Wholesale Dark Site	440-1,400	
		Co-location Facility	180-540	

Measuring floorspace

The Royal Institution of Chartered Surveyors (RICS) recognises 2 principal measurements of floorspace for B2 & B8 Use Classes: gross external and gross internal. In summary these are: Gross External Area (GEA) – this measurement includes walls, plant rooms and outbuildings, but excludes external space such as balconies and terraces.

Gross Internal Area (GIA) – this refers to the entire area inside the external walls of a building and includes corridors, lifts, plant rooms, service accommodation (e.g. toilets).

The tables defining the Royal Institution of Chartered Surveyors (RICS) floorspace from its 6th Edition 'Code of Measuring Practice: A Guide for Surveyors and Valuers' are included in the Appendix of this document.

Floor Areas for the Application Site

For comparison purposes floor areas for the application site have been calculated as per the above and tables within the Appendix and are as follows for the site:

GEA (Gross external area) for the application site = 908.14m²

GIA (Gross internal area) for the application site = 821.90m²

Employment Densities for the Application Site

The proposed Sui Generic Use is considered a direct comparison of the existing B2 General Industrial Use and based on the above Employment Density Matrix table the following Employment Density levels for the application building would be calculated as follows:

B2 General Industrial & Manufacturing Employment levels are based on 36m² of NIA/FTE Employee.

The GIA for the site is 821.90m² = 22.83 FTE Employees
(821.90m² ÷ 36m² = 22.83)

Numbers of Proposed Employees for the Application Site

Office Staff – 7 FTE

Embalmers – 2 FTE

Technical Staff – 1 FTE

Drivers – 8 FTE

Bearers – 5 FTE

Total – 23 FTE

The Total number of proposed Employees for the Application Site is 23 FTE Employees and is in line with the Homes & Communities Agency 2015 Employment Density Guide 3rd Edition Table 4. Employment Density Matrix for B2 Use. As such there will be no reduction in Employment nor will the Change of Use result in an intensification of employment use. Consequently, the scheme therefore accords with the saved Local Policies S4 & DM13.

Parking Impact

As has been demonstrated above the Employment levels of the proposed Sui Generic Use are comparable to the assumed Employment levels for the existing B2 Use. As such it is considered that the current vehicle parking will be sufficient for the proposed Use and will comply with Local Policies S1, DM13 & DM14 of the Adopted Eastleigh Borough Local Plan 2016-2036 - Adopted April 2022.

For commercial developments Eastleigh Borough Council Policy DM14: Parking uses the following Table 2: of the Hampshire County Council "Hampshire Parking Strategy and Standards 2002" to calculate the required Parking Standards. As the Employment Density levels for the proposed Sui Generic Use are equal to a B2 General Industrial Use this Building Type has been used for the purposes of demonstrating compliance with the guidance:

Table 2: Commercial Development				
Type	Car Parking Standard		Cycle Standard (minimum)	
	Maximum parking limit	Parking in highly accessible locations (30% of maximum permitted standard)	Long stay	Short stay
B1(a) office	1 space per 30 sqm Refer to Note (1)	1 space per 100 sqm	1 stand per 150 sqm GEA note	1 stand per 500 sqm GEA
B1 (b)(c) high tech/light industry	1 space per 45 sqm	1 space per 167 sqm	1 stand per 250 sqm GEA note	1 stand per 500 sqm GEA
B2 general industrial	1 space per 45 sqm	1 space per 167 sqm	1 stand per 350 sqm GEA note	1 stand per 500 sqm GEA
B8 warehouse	1 space per 90 sqm	1 space per 303 sqm	1 stand per 500 GEA note	1 stand per 1000 sqm GEA
Notes: 1. Subject to a condition or legal agreement restricting consent to the specified use. 2. Long stay cycle parking to be at least the greater of the spaces per GEA identified or 1 space per 8 staff. - For all major commercial developments a Transport Assessment and company or site travel plan will be required (see Table B for thresholds). - Proposed standards will take account of commercial development in predominantly residential areas - where demonstrable harm to local residents occurs the provision of on-street parking controls will be considered. - The Freight Transport Association will be approached for advice on commercial vehicle standards, which will be considered alongside the standards in force for commercial vehicles in neighbouring authority areas.				

The above table uses GEA measurements for calculations:

The GEA (Gross external area) for the application site = 908.14m²

Car Parking Standard

B2 – Max 1 car parking space/45m² (GEA 908.14m² ÷ 45m²) = 20.18 car parking bays

B2 – Min 1 car parking space/167m² (GEA 908.14m² ÷ 167m²) = 5.43 car parking bays

The Total number of external car parking bays for the Application Site is 7 standard parking bays. In addition, there are 8 internal parking bays for Funeral Vehicles and as such the parking provision is within the range of 5.43 – 20.18 bays for B2 General Industrial Use.

Cycle Parking Standard

B2 – Long Stay 1 space per 350sqm = 2.4 cycle parking spaces (GEA 908.14m² ÷ 350m²) = 2.59 cycle parking spaces

B2 – Short Stay 1 space per 500sqm = 1.72 cycle parking spaces (GEA 908.14m² ÷ 500m²) = 1.81 cycle parking spaces

The site does not currently have any secure cycle parking spaces. The application proposes 2 secure cycle parking spaces.

Electric car charging

One external electric vehicle charging point is to be provided and Internal electric vehicle charging points will be provided where required for electric vehicles used by the business.

6.0 CONCLUSION

The application seeks full planning permission for the Change of Use from B2 to a Sui Generis Funeral Directors Facility. As demonstrated in the Planning Statement it can be seen that, although a Funeral Directors facility is classified as a Sui Generis use, the processes and purposes of the building, when combined with the proposed scale of the business enterprise, will ensure that the use of the building will essentially remain in a B2 Use. The proposed levels of Employment are concurrent with the standard Employment levels within B2 uses and as such would not compromise existing employment land.

The primary aim of the most relevant policies S4 & DM15 are to ensure that valuable employment space is not permanently lost for non-compatible alternative uses that would also jeopardise the viability of the area as an industrial space. Redevelopment for employment use within the boundary of existing Employment Sites will be supported where it does not result in the overall loss of employment floorspace. As has been demonstrated it is considered that the proposed use would not result in a loss of employment floorspace, instead sitting comfortably alongside the adjacent businesses. There would be no impact on the viability of adjacent units as a result and the site would continue to function as a protected Employment Site. There would be no permanent alterations carried out to the building ensuring it could return to use as a B2 unit in future if no longer required. Overall, it should be considered that the proposal would accord with the fundamental thrust of Local policies in that the site would continue to be safeguarded for employment purposes. This accords with local policies that seek to safeguard areas that are capable of meeting a range of employment uses to support the local economy. This is consistent with the NPPF that places significant weight on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for Development

In conclusion the proposed change of use achieves the right balance in maintaining positive employment and economic benefits which meet the needs of the Borough whilst meeting the requirements of a modern business. In light of the above considerations, it can be seen that the proposed development accords with both national and local planning policy and as such, the planning application should be approved in line with the presumption in favour of sustainable development.

7.0 Appendix

The Royal Institution of Chartered Surveyors (RICS) defines floorspace in its 6th Edition 'Code of Measuring Practice: A Guide for Surveyors and Valuers'. These definitions are set out within the following tables:

Gross External Area – GEA

Gross External Area is the area of a building measured externally at each floor level

Including	Excluding
Perimeter wall thickness and external projections	External open-sided balconies, covered ways and fire escapes
Areas occupied by internal walls and partitions	Canopies
Columns, piers, chimney breasts, stairwells, lift-wells, and the like	Open vehicle parking areas, roof terraces, and the like
Atria and entrance halls, with clear height above, measured at base level only	Voids over or under structural, raked or stepped floors
Internal balconies	Greenhouses, garden stores, fuel stores, and the like in residential property
Structural, raked or stepped floors are to be treated as a level floor measured horizontally	
Horizontal floors, whether accessible or not, below structural, raked or stepped floors	
Mezzanine areas intended for use with permanent access	
Lift rooms, plant rooms, fuel stores, tank rooms which are housed in a covered structure of a permanent nature	
Outbuildings which share at least one wall with the main building	
Loading bays	
Areas with a headroom of less than 1.5m	
Pavement vaults	
Garages	
Conservatories	

Gross Internal Area – GIA

Gross Internal Area is the area of a building measured to the internal face of the perimeter walls at each floor level

Including	Excluding
Areas occupied by internal walls and partitions	Perimeter wall thicknesses and external projections
Columns, piers, chimney breasts, stairwells, lift-wells, other internal projections, vertical ducts, and the like	External open-sided balconies, covered ways and fire escapes
Atria and entrance halls, with clear height above, measured at base level only	Canopies
Internal open-sided balconies, walkways, and the like	Voids over or under structural, raked or stepped floors
Structural, raked or stepped floors are properly to be treated as a level floor measured horizontally	Greenhouses, garden stores, fuel stores, and the like in residential
Horizontal floors, with permanent access, below structural, raked or stepped floors	
Corridors of a permanent essential nature (e.g. fire corridors, smoke lobbies)	
Mezzanine floor areas with permanent access	
Lift rooms, plant rooms, fuel stores, tank rooms which are housed in a covered structure of a permanent nature, whether or not above the main roof level	
Service accommodation such as toilets, toilet lobbies, bathrooms, showers, changing rooms, cleaners' rooms, and the like	
Projection rooms	
Voids over stairwells and lift shafts on upper floors	
Loading bays	
Areas with a headroom of less than 1.5m	
Pavement vaults	
Garages	
Conservatories	