

2nd November 2023

REF: DRAP1001

Development Management
Eastleigh Borough Council
Eastleigh House
Upper Market Street
Eastleigh
SO50 9YN

Dear Sir/Madam

Proposed Draper Tools Self-Storage | Draper Tools Group Limited, Hursley Road, Chandler's Ford, Eastleigh, SO53 1YF

I act on behalf of our client Draper Tools Group Limited, who own and operate a highly successful business from their Headquarters on Hursley Road, Chandler's Ford in the Borough of Eastleigh.

This letter supports an application for a "Certificate of Lawfulness of a Proposed Use or Development" ('CLOPUD') being submitted to Eastleigh Borough Council ('EBC') as the Local Planning Authority ('LPA') which is being submitted on behalf of Draper Tools Group Limited ('Draper Tools').

In this case, Draper Tools are seeking to demonstrate that the proposed use of part of their headquarters building for self-storage is lawful. It is important to note that no development works are required to support the proposed lawful use; it is merely the use of the space within the building that is the subject of this application for the certificate of lawfulness.



The Draper Tools Headquarters fronting on to Hursley Road, Chandlers Ford

About Draper Tools

Draper Tools was founded in 1919 when Bert Draper sold government surplus and tools in markets around the Kingston Upon Thames area. This led to the purchase of the original warehouse, from which Draper Tools as we know it today was born, although at this time it was known as B. Draper & Son Limited and owned the trademark B.D.S. Although Draper Tools sold its own brand as early as this time, it was also a quality engineer's merchant and tool wholesaler.

Company records confirm that when Bert Draper passed away in 1963, control of the company passed to his son Norman. With the increased business and cramped conditions at Kingston Upon Thames, Norman purchased the freehold rights to the current premises in Chandler's Ford, Hampshire at auction the same year. Norman pushed the business forward dramatically and developed the 'Draper' brand as we know it today, by importing quality tools from all around the World.

The Draper Tools premises in Chandler's Ford comprise some 535,000 square feet of warehouse, storage and distribution space. The site incorporates dedicated parking for heavy goods vehicles ('HGVs') and the site receives and despatches circa 14 HGV vehicles on a working day, including their own HGVs and those of logistics companies including TNT, DHL, NIC and Freightroute.

The buildings incorporate goods inwards bays, goods out bays and substantial areas for the storage, packing and picking of goods that together make up the main and primary part of the Draper Tools business operation at the Chandler's Ford site, namely the receiving, storage and distribution of products. Deliveries to the site

The Draper Tools site on Hursley Road also contains areas of offices, a reception, a sales display area, staff canteen and welfare facilities; but the primary use of the site is a storage and distribution warehouse.

The establishment of the planning use of the site in the 1960s means that the site and the use is very free from planning conditions, and does allow the site to operate largely as it wishes, and indeed could operate 24 hours a day if it wished. That said, Draper Tools have always sought to be a good neighbour, and indeed many of their staff live in Chandlers Ford; so Draper Tools have always kept their night-time deliveries to an absolute minimum.

Planning History

The EBC planning committee report attached at Appendix 1 was prepared in relation to a planning application for reserved matters pertaining to the Draper Tools site, reference RM/17/80952. The committee report acknowledges on page 1 the LPA's understanding that the site is a *"Current industrial employment site mainly used for warehousing and distribution"*.

The report generally recognises that the whole site has a primary use for storage and distribution alongside a variety of headquarter functions including offices, reception, meeting rooms, research and development, staff canteen, showroom and car parking that all support the main use.

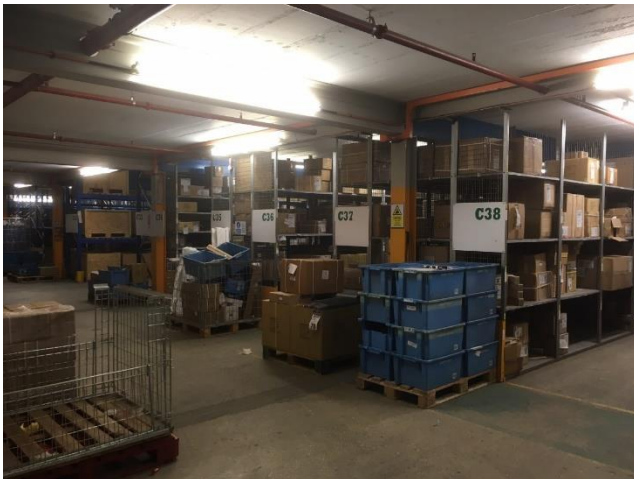
Use Classes Order

I have reviewed the Use Classes Order 1987 (as amended) and the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, and it is important to note that the definitions set out in these documents classify the Draper Tools Chandler's Ford site as a 'Class B8 Storage and Distribution' planning land use.

The Current Use

It is certainly abundantly clear to us from our site inspection that the area of the building proposed for the Draper Self-Storage operation is used solely for storage and distribution at the present time (Use Class B8) and the proposed use will be compatible.

The photographs provided below show the current interior of the building that is the subject of the above CLOPUD application and show how the building is laid out for the storage of received goods, ready for picking and onward despatch.



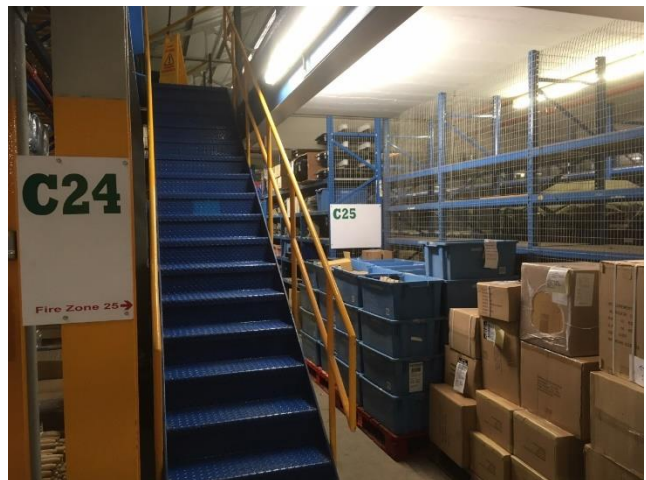
Photograph showing bays 32 to 38



Photograph showing bays 38 to 41



Photograph showing bays E20 up to E24



Photograph of bays C24 and C2 and stairs to upper floors

The Proposed Use

As you can see from the photos, the building, originally built for Supermarine as a factory has low floor to ceiling heights that require the use of lifts to each floor, and movement of goods by use of hand trucks. Fork lift trucks are not practical.

Draper Tools has had to adapt to modern methods of working and have built a new storage and distribution facility in North Baddesley. The new facility enables the use of stacked storage solutions and the use of fork lift trucks.

Draper Tools are in the process of slowly decanting the storage and distribution element from their Hursley Road site over to their new facility in North Baddesley.

Draper Tools wish to retain their office functions, research and development and some storage and distribution, but following the decanting to North Baddesley, there will be a large space vacant in their building.

Draper Tools see an opportunity to launch a new enterprise “Draper Self-Storage” in part of their building to serve the domestic storage market which is growing. This new use will make use of the great location, the existing customer car parking facilities and will merely see part of the retained building being used by customers as opposed to Draper Tools.

The relative domestic scale of the storage, the low floor to ceiling heights and access arrangements lend itself perfectly to the proposed use. The area of the building affected by the proposed use is shown edged in red and colour washed in red on the aerial photograph below.



Aerial photograph showing the area of the building affected edged and colour washed in red © Google Maps 2023

The proposed use (Use Class B8) is compatible with the existing and lawful Class B8 storage and distribution use; and as such, and in our considered opinion, it is a lawful use that does not require the need for planning permission.

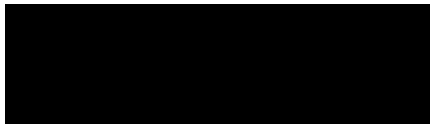
In addition to this letter, this application for a Certificate of Lawfulness of the proposed use is supported by a statutory declaration made by Mr Graham Wade of Draper Tools, and floor plans to confirm the area of the building affected.

It is interesting to note that the area affected is limited to the former Supermarine Building and it measures just 26.5% of the total footprint of the whole combined building.

I hope that this letter provides the LPA with enough information to confirm that the proposed self-storage use is a lawful use that can proceed without the need for planning permission.

If however you should have any queries, please do not hesitate to contact me.

Yours faithfully



Daniel Wiseman
Director

daniel@gillingsplanning.co.uk

REF. NO. RM/17/80952

PLANNING APPLICATION REPORT

DESCRIPTION ADDRESS	Reserved matters application to outline planning permission O/10/66978 dated 24.07.2012 as amended by variation of condition consents X/17/80362 (condition 1) dated 06.07.2017 and X/17/80089 (various conditions) dated 06.07.2017 for the construction of 130 dwellings (use class C3) associated roads, landscaping, parking, open space and play areas with access from Hursley Road and the construction of a care home (60-70 bedrooms) and close care bungalows (use class C2) with associated landscaping and parking and access from Ramalley Lane. DRAPER TOOLS LTD, HURSLEY ROAD, CHANDLER'S FORD, EASTLEIGH, SO53 1YF
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SITE VISIT DATE – 27/07/2017

ARE PLANS ACCURATE? - yes

HAVE ALL NECESSARY NEIGHBOURS BEEN CONSULTED? – yes and site notices displayed

THE SITE AND ITS SURROUNDINGS

DESCRIPTION OF APPLICATION	As above. The reserved matters are for appearance, landscaping and scale. Access and layout have previously been approved and the mix of dwellings previously agreed. Plan amendments have been submitted twice addressing inconsistencies between floor plans and elevations.
SITE AREA	4.1ha
RESIDENTIAL DEVELOPMENT DENSITY (NET)	31.7 dph No change from the original outline planning permission.
TOPOGRAPHY	Generally level site
TREES	There are a number of trees mainly around the site boundaries but these should not be impacted any further by the proposed amendments to the site layout.
BOUNDARY TREATMENT	Fencing to all site boundaries, the nature of which is dependent upon what the site borders, i.e. public or residential development.
SITE CHARACTERISTICS	Current industrial employment site mainly used for warehousing and distribution.
CHARACTER OF LOCALITY	The surrounding area is predominantly residential in nature, although some much smaller commercial businesses are present along Hursley Road. There is also an area of woodland to the south of the site with allotments and a cemetery beyond this.

RELEVANT PLANNING HISTORY

REFERENCE	DESCRIPTION	DECISION
O/10/66978	Outline: (1) Construction of 130 dwellings comprising 59No. 3-bed houses, 45No. 4-	Outline approval granted 24 th July 2012