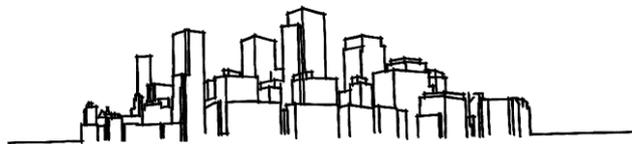


May 2023

PLANNING  
STATEMENT  
ADDENDUM

REPLACEMENT WORKSHOPS AND ERECTION  
OF DETACHED DWELLING AT LAND OFF  
THORNHILL ROAD, DEWSBURY.

**Job Ref: 2794**



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1. In January 2023 a planning application was submitted for the erection of replacement workshops/small industrial units and the erection of a detached dwelling on land off Thornhill Road, Dewsbury (Ref: 2023/90209).
2. A planning statement was submitted with the planning application that explained that in planning policy terms, the main considerations are that the site sits within a flood zone and the site is allocated as a Priority Employment Area in the Local Plan.
3. As the site is within a Priority Employment Area, Local Plan Policy LP8 applies to this application. The policy states that *“Proposals for development or re-development for employment generating uses (as defined in the Glossary) in Priority Employment Areas will be supported where there is no conflict with the established employment use”*.
4. The second part of the policy relates to the development of the site for non-employment uses. The policy explains that for non-employment uses development will only be supported where:
  - a) *it can be demonstrated that the site or premises are no longer capable of employment use; and*
  - b) *the proposed use is compatible with neighbouring uses and where applicable, would not prejudice the continued use of neighbouring land for employment.*
5. In the planning statement it was explained that the proposed development comprises the replacement of existing workshops/small industrial units, which accords with the first part of policy LP8, and residential development, which means the proposed development has to comply with the second part of the policy.
6. In assessing whether the proposed development complies with Policy LP8 it is necessary to assess the development as a whole rather than the constituent parts.
7. The site currently accommodates a scrap yard that employs 2 FTE and then three small units that each accommodate single traders. The site is unsightly, and the three small units are in a poor state of repair. Each of the businesses on the site generate little income and the rental income from the site is not sufficient to refurbish or replace the units on the site.
8. The submitted planning statement included photographs of the workshops on the site. Accompanying this statement is a Costed Schedule of Dilapidations, prepared by Crowther, Turnbull and Booth. This confirms the poor state of buildings on the site and sets out that the costs to refurbish the premises are £1.63m.

9. On 22<sup>nd</sup> March 2023 comments from the Council's Policy Team were published on the planning application website with objections to the proposed development. The policy response states that *"The principle in the first instance is not to accept the loss of business and industrial land and premises to non-employment generating uses and to comply with this part of the policy, applicants will need to demonstrate that the site or premises are no longer capable of employment use."*
  
10. We don't believe the concept of the proposed development has been fully understood as this application is not seeking to lose business and industry on the site, but seeking to improve the offer for business and industry on the site by seeking to provide new premises, that will employ more people than are currently employed on the site. The policy team's response explains that *"it should be demonstrated that the site has been marketed as a potential site for business and industry and why the buildings/land do not fulfil the standards required for modern commercial uses"*. However, there is no reason to market the site when the applicant is currently not looking for new tenants nor is wanting to sell the site. The applicant has tenants who would occupy the new units, and the existing tenants are okay to pay the low rent for the current premises, but this is unsustainable as the buildings are in a poor state of repair, which will soon be unsafe and not fit for purpose.
  
11. The proposed development will facilitate development opportunities in the Priority Employment Area. The principle of this argument has been accepted by the Council by the approval of a mixed used scheme at Stanley Mills, Britannia Road, Milnsbridge (Ref: 2018/90501), where the planning consent allowed the Change of Use and alterations to part of the mill to form 42 residential units and 8 light industrial units and retention of part of existing retail use.
  
12. With that application the Council had concerns about residential development in a Priority Employment Area but after being presented to the Planning Committee for the first time with a recommendation for refusal, in their second report officers noted *"The Sub Committee considered that the provision of residential development in this location would not prejudice the adjacent employment uses and there were benefits to the scheme in that it would provide a viable use for this building, including new employment uses"*.
  
13. The main difference is that Stanley Mills was empty and had been on the market for several months, whereas this application seeks to intervene before the premises are no longer safe or fit for occupation. However, the benefits of providing new/improved employment uses and the fact that residential

development would not prejudice neighbouring employment uses are very similar to the approved scheme at Stanley Mills, albeit at a smaller scale.

14. In terms of the request by the Council to provide evidence that the premises are no longer capable of employment use, the attached Schedule of Dilapidations sets out the refurbishment costs of the buildings as being £1.63m. Also attached is a Build Cost Estimate by Crowther, Turnbull and Booth for the proposed new workshops, which indicates a total build cost of £808,660.
15. This information demonstrates how dilapidated the existing units are and how much work is required to refurbish them. It also demonstrates how much cheaper it would be to provide new, larger more suitable premises on the site, however there is still a significant cost to this that is simply not viable unless the applicant can factor the development of a house into the financial equation.
16. The proposed dwelling is at the northern limit of the Priority Employment Area and as such will not impact or be affected by neighbouring employment uses. It is reasonable for this area to be excluded from the PEA in future reviews of the Local Plan as the dwelling is compatible with the neighbouring Riding School
17. As a whole the site supports businesses that together employ 5 FTE. The new units will have a roadside frontage with proper forecourt and parking area. Whilst there will only be two units, each will have a larger footprint than the existing units and will be two storeys to allow office/storage space on the first floor, which will make them far more attractive to small businesses. Whilst the current units are only capable of supporting sole traders, the proposed units will be able to support businesses with 3 or 4 employees each, with higher paid income than the existing businesses.
18. The proposed development will see a net increase in employment opportunities within the Priority Employment Area (PEA) as well as securing the long-term viability of the business units.
19. The proposed development will see the environmental improvement of the site. It will see the replacement of the scrap yard which causes disturbance to the local residents. It will improve the roadside frontage of the site, which as shown above detracts from the character of the area.
20. In terms of other planning considerations, the proposed development will improve the visual amenity of the area. There will be an improvement to residential amenity by reducing the cars parking on the road and there will be a reduction of the noise generating uses in the area. The proposed

development will formalise the parking area to the front of the site and create a clear boundary to the public highway, therefore creating a positive impact in terms of highway safety. The proposed development will clear up a site where petrol and oil has been spilled over a number of years and therefore the proposed development will have a positive impact in terms of cleaning up potentially contaminated land.

21. This statement and the supporting information demonstrate that the proposed development accords with the Kirklees Local Plan and the National Planning Policy Framework.