

Planning Consultation Request

Town and Country Planning Act 1990

APPLICATION FOR PERMISSION TO DEVELOP LAND

<p>Consultation Response from KC, Policy</p>
<p>2023/90668 Grange Moor Coachworks, Barnsley Road, Grange Moor, Huddersfield, WF4 4DR</p>
<p>Erection and operation of a single building comprising a Sui Generis land use limited to the purpose of storage, assembly, sale and distribution of custom-built computers, laptops and their components as well as any associated development (those being a replacement wind turbine, utility provision, drainage, access, hard and soft landscaping) within the red-line boundary alongside business operations pursuant to the effective administration of the Sui Generis use.</p>
<p>Date Responded: 25 September 2023 Responding Officer: Hannah Morrison/Amanda Potter Responding Ref:</p>
<p>This application is for the erection of a new sui generis building (7,350sqm, 15.5m in height), including office and staff welfare accommodation, along with associated works within the red line boundary, as detailed in the description above. The proposal involves the demolition of the existing buildings on site, including the steel-clad engineering building and attached brick-built office block, and clearance of all scrap vehicles. The site is in the Green Belt therefore Green Belt policies in the National Planning Policy Framework (NPPF) and Kirklees Local Plan (KLP) will apply.</p> <p>The Local Plan was adopted on 27 February 2019 and the Local Plan Strategy and Policies should be fully considered. The following response relates to specific Local Plan policies which are of particular relevance to the proposal. Other policies that are not mentioned here may also apply.</p> <p>Green Belt</p> <p>The National Planning Policy Framework (NPPF) paragraph 149 states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt except for a small number of specified exceptions, none of which apply to this proposal. The proposal therefore constitutes inappropriate development. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any application, a local planning authority should ensure that substantial weight is given to any harm to the Green Belt and very special circumstances will not exist unless the potential harm by reason of inappropriateness, and any other harm arising from the proposal, is clearly outweighed by other considerations.</p> <p>It should be noted that it is unclear from the supporting statement whether the applicant regards this scheme as not inappropriate. In paragraph 3 the applicant has stated that they have set out the very special circumstances required to demonstrate that the proposal outweighs the harm caused to the Green Belt. In paragraphs 72 and 78 reference is made to NPPF paragraph 149 criteria g) 'partial or complete redevelopment of a brownfield site' and Local Plan policy LP59 'brownfield sites in the Green Belt' and it is stated by the applicant that a significant portion of the site is previously developed. In paragraphs 95 and 96 in the context of the Landscape Character Assessment it is concluded that the development would not have a greater impact on the openness of the Green Belt. Notwithstanding this</p>

information, and in view of the fact that the applicant has set out very special circumstances, it is assumed for the purpose of this response that it is common ground between the applicant and the council that this proposal represents inappropriate development in the Green Belt, not redevelopment of a brownfield site within the Green Belt. The rest of this response as it relates to the Green Belt is made on the basis that the starting point for the assessment of this proposal is that the building does not meet any of the exceptions listed in paragraph 149. The reason for the council's decision is set out below under 'previously developed land'.

The applicant has set out in their supporting statement (paragraph 114) the very special circumstances which they contend outweigh the harm caused to the Green Belt. These are:

- The need for new employment land;
- Lack of preferable alternative sites to meet this need;
- The positive local socio-economic effects of the site;
- The previously developed nature of the site;
- The visual improvements to a site that would otherwise not be cleared up; and
- Clearance of contaminated land.

This response considers the very special circumstances put forward in support of the proposal and assessment of the proposal against Green Belt policy.

The site within the red line boundary can be described as being in two parts: the northern part consists of the depot building and attached office block with associated hardstanding and a single storey building located along the western boundary. The rest of the northern part of the site is used for the outdoor storage of plant and machinery. The southern (wider) part of the site is a field which was until recently used for managed pasture grassland. Also located in this part of the site is the area of a former quarry. Over the years, and as evidenced on aerial photographs, vehicle storage has spilled over from the northern part and now occupies the north-western corner of this field.

It should also be noted, and it is pertinent to the consideration of this application, that impact should be judged relative to the lawful use of the site. Much if not all of the external storage of vehicles and machinery at this site is not lawful, so the starting position for any assessment should be the proposal as submitted compared with the site minus unlawful external storage.

The need for new employment land

The need for new employment land, can be considered in two parts, the general need for employment land within the district and the specific needs of PC Specialist (PCS).

Regarding the general need for employment land within the district, the Local Plan Inspector was clear that even with the removal of some of the employment allocations (Clayton West and part of Cooper Bridge) which occurred during the Local Plan preparation process, the Objectively Assessed Need (OAN) for 175 hectares of employment land in Kirklees would still be met.

The Inspector concluded that overall supply from identified sources would total 193 hectares, against the requirement of 175 hectares and that an oversupply of 18 hectares provides sufficient flexibility to allow for an element of non-delivery from commitments and allocations or deal with changing circumstances and allows for some market choice. The Inspector goes on to say that as further allocations would be likely to involve the release of Green Belt land, this represents an appropriate balance between meeting employment needs and protecting the Green Belt.

Currently within the district, there are employment and mixed-use Local Plan allocations that are not developed, these are part of our employment land supply and should be developed prior to Green Belt land.

The allocation of land as Priority Employment Areas (PEAs) across Kirklees allows for churn and supports the growth aspirations of the small and medium sized businesses established in Kirklees. These existing employment areas will need to be retained if jobs are to be provided in locations which are close to residential areas and reasonably accessible by public transport.

The Inspector concluded that the PEA assessment is appropriate and proportionate and that PEAs play an important role in providing local employment opportunities and contributing to the local economy. The potential employment supply across the district of 48ha from vacant land within designated PEAs is considered as potential employment supply and contributes to our OAN (SD1, Table 5). These sites are not considered as windfall as they form part of the employment land supply in the Local Plan. The Inspector concluded that the employment strategy and policies are justified, effective and consistent with national policy.

Turning to the needs of PCS specifically, the applicant states that PCS are a local well-established business in Grange Moor, who design, manufacture, and distribute high end gaming PC's which can be purchased directly from the company or via a number of different major retailers including Currys PC World. They are a major employer for the area and the business has already expanded significantly over the last few years. The company currently employs 213 (this figure differs throughout the applicants statement) staff and intends to increase this number (in a variety of roles) by a factor of 4 over the next few years based on current growth projections. This will make them one of the largest employers in the area. The applicant states that the proposed building is crucial for the business to expand in order to meet its expected growth requirements.

To be able to assess the applicants need for new employment land/floorspace, more information is required from the applicant around the business model and expansion plans. The Planning Statement states that the business has already expanded significantly over the last few years and that the proposed building is crucial for the business to expand in order to meet its expected growth requirements. How large were the premises at the start, how large are they now and what is the evidence/projections as to why they need a much larger unit? Further details of their expansion programme (staff and outputs) would help to understand why they need larger premises.

The supporting information submitted doesn't provide any real evidence of the scope of expansion apart from stating that staff numbers could increase from 205 (213?) now, to 400 if suitable premises were readily available and should their expansion into European Markets progress as expected, it is envisaged that the required number of staff would be in the region of 1000 full time equivalent staff. Is the size of the building proposed, as well as on-site parking and transport provision, based on 400 staff or 1000 staff?

In relation to the height of the proposed building, para 29 states that the building will be 15.5m tall (11m internally) and that this has been set by the minimum operational requirements of the client. What are the operational requirements that require this height of building? Given the potential harm of the scheme on the Green Belt, this information is considered necessary to inform decision-making.

Therefore, more information is required from the applicant around:

- **Business model and expansion plans**
- **Justification for the height of the building proposed**

Lack of preferable alternative sites to meet this need

The applicant has chosen the Grange Moor Coachworks location because in their opinion there are no other suitable sites within Kirklees to meet their requirements, and the basic locational requirements of

the company, which are set out by the applicant (this information came from PCS direct to Inward Investment) as follows:

- Locationally to be around Huddersfield or the South of the district - ensuring staff retention and to minimise disruption to business continuity
- Freehold required
- Unit size from 85,000 sq ft (7,900 sq. m.) to 160,000 sq ft (14,865 sq. m.)
- Land requirement of 2-3 ha (5-7 acres)
- Good proximity to A roads
- Eaves height of 11 meters
- Good size service yard with 4 No. dock levellers and 2 No. straight-in loading doors
- 250 car parking spaces

The LPA still await formal submission of the applicant's statement in respect of a lack of preferable sites which should be supplementary and significantly more detailed than the descriptive approach of the Planning Statement.

Locational requirements:

The applicant has stated that any new premises would need to be located '*around Huddersfield or the South of the district - ensuring staff retention and to minimise disruption to business continuity*'

More information is required around '*ensuring staff retention*', why is this the case? Where do the existing workforce commute from? Is the current workforce local i.e from around Huddersfield and the south of the district? An understanding of the current workforce and commuting patterns, detailing from where in Kirklees employees commute from, would help to determine what the catchment area is for this business – it is understood that this information is also necessary for a separate transport response to the LPA and should therefore the submission of this information should align accordingly. Are there any other locational factors that the applicant wishes to put forward as to why the Green Belt site is the only suitable location compared to other sites?

The submitted Planning Statement is vague on this issue, para 21, refers to 43% of staff living in Kirklees but where in Kirklees do they live? Also, what is the locational distribution of the remaining 57% of staff members outside of Kirklees?

An alternative site/premises in Barnsley is discussed, at para 18, relocating here 'would mean many of the staff who are local to the existing premises, would increase their journey time to work'. What is meant by 'many'? How many staff would have to travel further? Where is the evidence around increasing journey times to work? Overall, a detailed breakdown of employee commuting distributions/locations would help to justify why sites have been discounted.

Size requirements:

A better understanding of the business expansion and growth plans are required to justify the size requirement.

Freehold requirement:

Why is freehold required? Would a long-term lease (100yrs) be acceptable? Why wouldn't a long-term lease be able to meet the applicant's needs?

Therefore, more information is required from the applicant around:

- **Locational requirements**
- **Size requirements**
- **Freehold requirement**

Since October 2020 the applicant has been in contact with Kirklees Council's Inward Investment Team to find suitable premises/site for them to move to. The applicant has a requirement for premises of approximately 15,000 sqm over multiple floors, with a floor plate of at least 7,500 sqm. The premises have to be serviced by range of vehicles from articulated lorries for the delivery of bulk items/raw material to smaller vans for deliveries and exports. Inward Investment only searched for sites 1.5 ha and above, throughout the entire district.

Appendix 2 of the Supporting Statement provides a list of premises and sites, including vacant land in PEAs, that have been put forward by the Council's Inward Investment Team, and explains why (after assessment by both the applicant and Inward Investment) the sites are considered to be unsuitable.

Priority Employment Areas (PEAs):

In terms of PEAs the Council (LPA) accepts that some of the vacant land within PEAs is only suitable as expansion land for existing businesses and that with the size constraints listed above (which require further justification) the number of potential sites within PEAs will be limited.

Inward Investment supplied the applicant with a list of 9 sites (vacant land in PEAs) with an area large enough to accommodate the requirements of PCS (1.5ha minimum). These sites have been appraised by Inward Investment to determine suitability to accommodate the required footprint. Of these 9, 7 are deemed by Inward Investment and the applicant as unsuitable as their developable area is much smaller than the 3.7 acres needed (steep slopes or very narrow strips of land have been netted off to create a more realistic development footprint).

Inward Investment and the applicant determined that the 3 remaining sites could theoretically accommodate a unit of the scale required it is known these sites are not available. These being land within Syngenta (Huddersfield), Mars Petcare (Birstall) and Gas Works Street (Huddersfield). Due to the hazardous nature of operations at Syngenta and the high security access, independent development within their ownership is not possible at this time. The land within Mars Petcare is actually a woodland walk to support their staff welfare and therefore not available. Finally, the land at Gas Works Street is currently being used for match day parking for Huddersfield Town, but also forms an integral part of the Station to Stadium Enterprise Corridor. Consequently, the site is currently not being made available at market.

However no individual assessment of each discounted site has been given, therefore the applicant will need to submit a full assessment of each of the 9 sites (including maps of where the land is) detailing the full reason why each site has been discounted, including reasons why the developable area of each size doesn't meet requirements. This should be included in the applicant's dedicated statement on the 'Lack of Preferable Sites', previously mentioned above.

Local Plan Allocations:

The applicant has reviewed all of (in the applicants opinion) the available sites (Employment and Mixed-use Allocations) and discounted them all due to suitability, availability or deliverability issues.

Listed below are all the Local Plan Employment and Mixed-use allocations that the LPA consider, could be of a size (which requires further justification) to meet the requirements, that aren't already built and occupied. The applicant would need to assess all these sites for suitability, deliverability and availability. 4 of these have already been assessed and discounted for various reasons by the applicant, the reasons are set out below, along with the LPAs assessment. The remaining 3 sites (ES6, ES9 and ES12) will need to be assessed by the applicant before further comments can be made.

ES6 - Land to the north and west of, The Royds, Whitechapel Road, Cleckheaton

LPA's Assessment - No assessment provided by the applicant.

ES7 - Former North Bierley Waste Water Treatment Works, Cliff Hollins Lane, Cleckheaton (site 3)
Applicants assessment: Building specifically designed as a logistics hub with numerous loading bays. Due to the buildings design, PCS are unable to implement their desired layout. The space available also exceeded the amount required. Location presents a problem for staff retention.

LPA's Assessment - Further information required around size, design and staff retention.

ES9 - Former Cooper Bridge Waste Water Treatment Works, Leeds Road, Mirfield (site 7)
LPA's Assessment - The assessment provided by the applicant for this site repeats that of MXS7. As there is currently no planning application pending for this site, it is assumed that this assessment is not correct. The applicant should provide an updated assessment for this site.

ES12 - Land west of, Honley Business Centre, New Mill Road, Honley
LPA's Assessment - No assessment provided by the applicant.

MXS3 - Land south of Lindley Moor Road, Lindley, Huddersfield (site 8)
Applicant's assessment: The largest unit is for 50,000 sqft and the premises are to be made available on a leasehold basis only.

LPA's assessment: Size and leasehold justification required.

MXS6 - Land at, Slipper Lane, Leeds Road, Mirfield
Applicant's assessment: No units suitable for PCS within the approved scheme and long-term leasehold options were only to be made available.

LPA's assessment - The second phase of Moor Park 25 delivered five further industrial buildings, each ranging between 19,500 to 59,000 sqft, therefore there are no buildings on this site to meet the applicants size requirements (more information is required from the applicant around justification for size requirements, see above, before these units can be discounted).

MXS7 - Land east of, 932-1110 Leeds Road, Shaw Cross/Woodkirk, Dewsbury (site 6)
Applicant's assessment: Location is not ideal in relation to workforce draw and timelines for scheme unknown and not likely to align with PCS.

LPA's assessment - What is meant here by 'not ideal', evidence asked for above relating to workforce commuting patterns will be informative in this instance. Has the applicant held discussions with the landowner to find out proposed timescales etc? It was resolved by Strategic Planning Committee (8/12/22) to grant permission for this site, which includes outline permission for 35ha of employment uses (Outline 2020/92331).

Windfall sites:

As well as a review of the Local Plan allocations and designations, Kirklees Inward Investment team held discussions with commercial agents as well as developers and have made enquiries with the Councils Disposals and Acquisitions team, the commercial market was searched and continually monitored via CoStar. 4 potential sites were found during this process:

Former Mamas and Papas, Colne Bridge

Applicant's assessment: Property was of interest to PCS. Viewing took place, however unit layout with multiple loading bays did not align with PCS requirements. Building also had insufficient parking and Network Rail's TRU scheme would also be impacting on the site, which created additional concerns.

LPA's Assessment - The LPA understand that this unit has now been purchased and is in use by another company.

Greenside Mills, Skelmanthorpe

Applicant's assessment: Whole site placed on the market with planning approved for demolition of mill building and industrial units to make way for residential scheme (App: 2018/91787). Opportunity brought before applicant who considered option, but the price was prohibitive due to the residential value placed on the site.

LPA's Assessment - The buildings have been demolished on this site, but as of the last monitoring period no residential new build has started. However, the outline permission for residential has been implemented, due to the demolition.

Green Belt site, Grange Moor

Applicant's assessment: Greenfield site located within the Green Belt at Grange Moor. Negotiations with landowner to purchase the site were started, but multiple constraints identified with regards to playing pitches, allotments in addition to the Green Belt and greenfield status of the site.

LPA's Assessment - This site is within the Green Belt

Former Green & Brown Unit, Jubilee Way, Grange Moor

LPA's Assessment - No assessment provided by the applicant.

In summary, more information is required from the applicant:

- **Individual assessments of PEA sites**
- **Local Plan allocation assessments**
- **Assessment of the Green & Brown site**

If the applicant can satisfy the LPA that all alternative sites have been explored and assessed, to the extent that the applicant can robustly justify both the locational requirements and size requirements of their preferred site within the Green Belt, then weight could be attributed to a lack of suitable sites being a consideration for 'Very Special Circumstances' in the planning balance.

The positive local socio-economic effects of the development

The LPA consider that any new development within the district, especially development that will secure further investment, business retention and provide and retain jobs would make a positive contribution to the local economy, both in terms of GVA and job creation. That being said, the socio-economic effects of the site being developed in this location are intrinsically linked to whether there is a lack of preferable sites in Kirklees. Through this lens, the positive socio-economic effects of the development could be considered as a compound multiplier to considerations which may weigh in favour of very special circumstances, dependent on the content of the 'Lack of Preferable Sites Statement' requested above.

As such, more information should be supplied in respect of the impact on the relocation of the business outside of Kirklees should no suitable sites be identified in the applicant's statement.

Similarly, further information in respect of the planned growth trajectory, including definitive job growth figures and the planned training scheme would be beneficial so that an accurate level of weight can be attributed to these considerations for the purposes of the 'very special circumstances' assessment.

Previously developed land

At paragraph 10 of the supporting statement the applicant states that a significant part of the site is previously developed, and that as a result of the spread of the machinery storage and dismantling business the developed area now extends to over 2.3 ha, (the total area within the red line boundary is 7.24ha). This position is repeated in paragraph 142. The LPA does not agree that 2.3ha within the red line boundary constitutes previously developed land. The definition of previously developed land in the NPPF includes “land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.” There is a large depot building (and attached office) on this site with some associated hardstanding which together can be taken to be previously developed. However, by contrast, it is not accepted that any other part of the northern part of the site can be considered to be previously developed or ‘brownfield’, as there are clearly areas where vehicles are parked on land which is not hard surfaced. The spread of vehicle storage into the southern part of the site is straight onto agricultural land. It is therefore the LPA’s position that the area of this site that may be regarded as previously developed extends only to that part of the site that received permission for the depot and its hardstanding, which extends to no more than approximately 0.75ha. Previously developed land therefore only represents a small proportion of the site area and is why the council does not consider that the application can be considered against NPPF paragraph 149 criteria g) or LP59. Even if it did, it is the council’s position that there is a very substantial and materially greater impact on the openness of the Green Belt between the existing development and the proposed development (which will be further assessed below) so that, if assessed against 149g) and LP59, the proposal would fail to comply with Green Belt policy. As only a small proportion of the site is previously developed, in the balance the part developed nature of the site only carries limited weight.

Visual improvements

It is the applicant’s position that the existing use is unsightly and, despite enforcement action by the LPA, there is little if any prospect that the site will be cleared as the owner lacks the resources to do so. Granting planning permission for the proposal would not only remove the unsightly use but enable improvements to landscaping and this would have a beneficial effect on visual openness of the site. The LPA needs to make it clear that visual quality and visual openness are not interchangeable terms in respect to Green Belt policy. The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open, and openness is an essential characteristic of the Green Belt. Protection of visual quality is not a purpose of including land in the Green Belt. The council’s position in respect to openness is considered below while visual quality, that is the benefits of tidying up the site to remove an unsightly use, is considered here as one part of the very special circumstances put forward by the applicant. The council accepts that allowing the proposal would result in the removal of the unsightly stored vehicles and machinery. However, the result would be a very large new building, not a restored site. The council does not accept that allowing the proposal is the only means to achieve the clearance of the stored machinery. The applicant needs to provide further information as to why alternative methods to improve the site may be undesirable or unrealistic.

Indeed, it is the comparison between the site as it would appear lawfully with that of the site’s appearance if the proposed development were permitted that should be weighed as part of the overall planning balance. As such, to justify very special circumstances in respect of ‘Visual Improvements’, a more nuanced discussion of the impediments to a theoretically lawful site appearance alongside the special characteristics of the development’s visual benefits would be necessary in this instance, though it remains to be seen what weight could be attributed to this, if any.

Clearance of contaminated land

NPPF paragraph 145 states that local planning authorities should plan positively to enhance the beneficial use of Green Belts, including to improve damaged or derelict land. There appears to be some degree of contamination caused by the storage/dismantling of vehicles/plant on the northern

part of the site. The position of the former quarry is not indicated on the proposed masterplan, nor is the relationship between the proposed surface water balancing pond and drainage attenuation measures and the former quarry area. Proposed works to remediate any contamination would weigh in favour of the proposal but the degree of contamination needs to be ascertained in order for the balance to be applied.

Impact on openness

There is no doubt that the existing use has a significant impact on the openness of the Green Belt, both spatially from the presence of buildings and visually from the presence of the buildings and stored vehicles and machinery (bearing in mind this relates only to the extent of any lawful external storage), as well as through the normal operation of the businesses including traffic movement to, from and within the site. It is the applicant's position that the increased impact on openness that would result from the new development is none/minor. The LPA does not agree with this position, as the existing buildings occupy a small proportion of the northern part of the site. The application proposes a building that would be more than twice the height of the existing building (15.5m compared to 7m) and whose footprint would extend to the vast majority of the northern section of the site. This would result in a building much larger than the existing buildings, and with a mass and permanence as a structure in the landscape which the vehicles, (or unused land) do not have. To overcome the sloping nature of the site and to achieve a level footprint, it is proposed to cut into the slope at the northern end (to create a goods yard loading/unloading area), but the extent and height of the building, particularly the southern extent positioned on the higher part of the site will still accentuate its impact in the landscape cutting off views across the site from most directions. Development is also proposed to extend significantly into the existing field through the laying out of a 258-space staff car park. Other areas of parking/development are also proposed, which include: a covered bike store, two new substation buildings south of the car park and a further 'stand-alone' area to be used as a public charging layby (presumably EV charging points) which also necessitate another new access off Barnsley Road. Whether any visible works are proposed for the surface water attenuation is not clear so further details should be provided by the applicant in this respect. Taken as a whole, and when compared to the lawful use of the site, the significantly greater height and footprint of the building, the extension of the car parking into the southern field, and other associated buildings and engineering works will undoubtedly harm the openness of the Green Belt and this harm carries substantial weight.

Impact on the purposes of including land in the Green Belt

Paragraph 138 of the NPPF states that the Green Belt serves five purposes, including to check the unrestricted sprawl of large built-up areas, to assist in safeguarding the countryside from encroachment and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The site is located on the edge of the village of Grange Moor. Between the inset village and the site is a major road junction and urban fringe development including houses, a pub and other businesses. The existing buildings on the northern part of the site are located immediately adjacent to the pub and form part of the transitional landscape between Grange Moor and the wider countryside beyond. The proposed new building would have a height, bulk and mass wholly unproportionate to its neighbours or to its Green Belt setting and would extend built form significantly to the south, with the car park extending development even further south into the field, with the result of the appearance of sprawl down the slope and along Barnsley Road.

The northern part of the site, while not all previously developed land, is industrial in nature and is not countryside. The southern part of the site is a field and while there are vehicles parked on it this has not yet altered its character, so that it appears as part of the wider countryside to the west, south and east of the site. The proposed new building, by virtue of its bulk, height and mass, would encroach into public views of the site and be a very prominent and dominant feature in the landscape, to the detriment of the enjoyment of the wider countryside. Also to be considered are other urban features of

this development including the substations, retaining walls, security fencing and any proposed lighting. As a whole the scheme would represent significant encroachment into the countryside.

The LPA does not accept that the site is derelict, which is not the same in this instance as unsightly. However, it is distinctly urban in character. Green Belt policy allows for the recycling of previously developed land through the exceptions set out in paragraph 149 but as stated above the LPA does not accept that this application can properly be assessed against NPPF paragraph 149 criteria g). Allowing the proposal would also undermine the purpose of the Green Belt by failing to assist in urban regeneration through encouraging new development outside of the Green Belt.

Harm to the Green Belt carries substantial weight. In this instance, harm is caused by reason of inappropriateness. There is also very significant harm caused to the openness of the Green Belt and harm to the purposes of including land in the Green Belt. Harm may also be caused through any other harm not covered in this response. Any benefits, in terms of very special circumstances, of allowing this proposal will need to overcome the substantial degree of harm to the Green Belt that would be caused as a result of this proposal.

Wind turbine

NPPF paragraph 151 states that elements of many renewable projects will comprise inappropriate development when located in the Green Belt and that developers will therefore need to demonstrate very special circumstances. The existing turbine on site received approval on appeal in 2011, on the basis that the harm caused to the openness of the Green Belt as a result of the proposal was outweighed by the contribution to renewable energy. Assuming the new turbine is the same scale as the existing turbine and located in the same place there should be no greater impact on openness and therefore there is no objection to this element of the proposal subject to the submission of specifications which confirm that the replacement turbine is in the same place and of the same scale and mass as the existing development.