November 2023

PLANNING STATEMENT ADDENDUM

NEW B2/B8 INDUSTRIAL UNIT AND ASSOCIATED WORKS ON LAND AT GRANGE MOOR WF4 4DR

Job 2753

PREPARED BY ACUMEN DESIGNERS &ARCHITECTS LTD
Headrow House, Old Leeds Road, Huddersfield HD1 1SG Tel: 01484 546000

ACUMEN
Designers & Architects

CONTENTS

Contents

CONTENTS **2**

SECTION 1: INTRODUCTION **3**

SECTION 2: SIZE AND SPATIAL REQUIREMENTS **3**

SECTION 3: STAFF RETENTION **4**

SECTION 4: ALTERNATIVE SITES **7**

LOCAL PLAN EMPLOYMENT ALLOCATIONS 8

PRIORITY EMPLOYMENT AREAS 14

APPENDIX 1: TURNOVER OF PCS (2013 – 2023) 19

APPENDIX 2: SEE ATTACHED REQUIREMENTS VALIDATION REPORT BY FORTNA 19

APPENDIX 3: PCS STAFF JOURNEY TO WORK SURVEY RESULTS 20

SECTION 1: INTRODUCTION

1. This Planning Statement Addendum has been provided in response to the Council's Planning Policy Team's request for additional information as part of the justification for 'Very Special Circumstances' for development in the Green Belt.

2. The requested information related to:
   i) The size of the building
   ii) An assessment of all employment sites in the District.

SECTION 2: SIZE AND SPATIAL REQUIREMENTS

3. PCS currently occupies two buildings on Jubilee Way. Unit 9 has a footprint of 25,000 sq. ft. and incorporates internal offices and a mezzanine taking the total internal area to approx. 33,000 sq. ft. Unit 12 has a footprint of 15,000 sq. ft. and incorporates internal offices and a mezzanine taking the total internal area to approx. 23,000 sq. ft. Therefore, they currently occupy approximately 56,000 sq. ft. across a footprint of 40,000 sq. ft. They are also using offsite storage for approx. 700 pallets which is proving highly expensive and difficult to manage with daily trips between the offsite storage in Wakefield and Jubilee Way being required to retrieve stock.

4. The business was established in 2003 and since then has showed continued growth. After being in premises in Lepton, then Shepley and Brockholes, PCS moved to Grange Moor in 2013, and then extended to the second unit in 2015. By 2019 it became apparent that the existing premises are not large enough and the business began its search for new premises, but without success. The business is now struggling with the space they have, and the lack of space is starting to impact on the effectiveness of the business.

5. Whilst it is clear PCS need new larger premises there is no exact way to predict the future growth as there are too many anomalies that affect the business, such as economic climate, level of competition, new innovations in the marketplace and working patterns. However, a starting point is to look at growth over the last 10 years.

6. Appendix 1 shows the turnover of PCS over the last 10 years from 2013 until 2023. These figures show an increase in turnover by a factor of 3.5 over the last 10 years. However, the years of 2020 and 2021 are anomalies due to COVID. Up until that time

the business grew at a rate of approximately 15% per annum. If that rate was extended up to 2023, the turnover would be approximately £110m, which would be an increase in turnover by a factor of 4.

7. PCS commissioned Fortna, who are a warehouse optimization, design and automation company, to help them asses their building requirements and to set out the internal layout. They have assessed the growth requirements on the assumption of 4x growth in production over a 10-year period to match the last 10 years. Fortuna concludes that at this rate of growth, the business requirements will exceed the building capacity, without internal modifications, by 2033, however this is based on 4 x growth, when we know that growth over the last 10 year has been 3.5 x growth.

8. Clearly this assessment shows that the applicant cannot afford to have a smaller building as it is more than likely they will have to expand or relocate in the next 10 years. There is a concern that the proposed building may not be large enough, but there are other issues to factor in, such as it is expected that the business will expand overseas, in which case there will be scope to move some elements of the business operation overseas, but before that, it will allow significant employment growth in this location. As the business develops over the next ten years it is expected that new innovative working and production techniques will emerge which will further help manage the demand for space. The proposed building therefore provides a reasonable compromise on having a building that is large enough to future proof the company's spatial demands, and not having an unnecessarily large building that will have a greater impact on the openness of the Green Belt.

SECTION 3: STAFF RETENTION

9. PCS currently employ approximately 250 staff. Staff figures fluctuate but this was the position in October 2023. In June 2023 a staff travel to work survey was carried out. At that time the staffing levels were approximately 220, of which 153 responded to the survey.

10. The findings of the survey are provided in Appendix 3. The results show that the employees are distributed evenly around the existing location.

Fig. 1 – PCS Travel to Work Survey Results

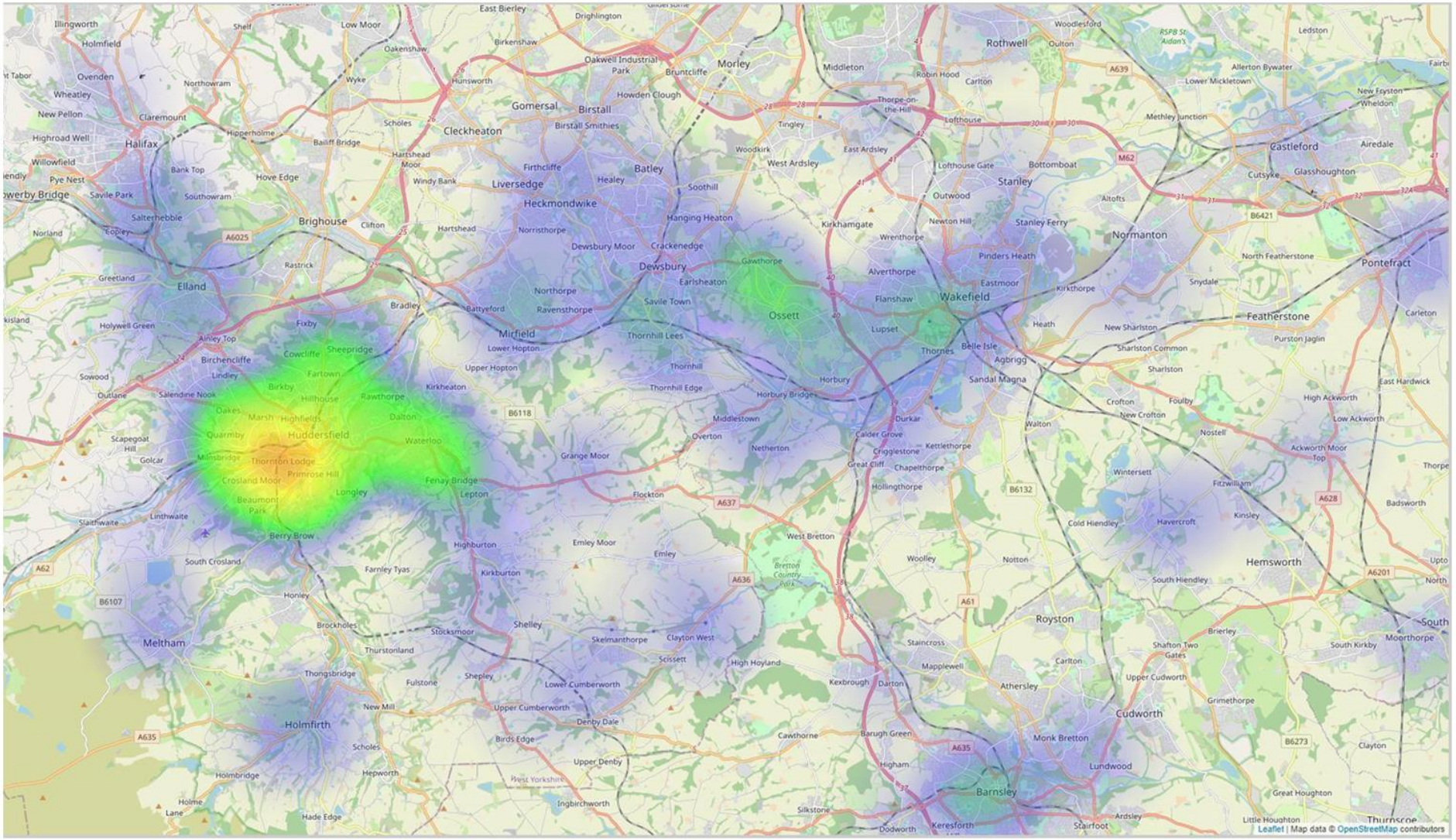
Post Code Area	Number of Employees	Percentage
BD (Bradford)	1	0.65%
DN (Doncaster)	4	2.6%
HD (Huddersfield)	65	42.1%
HU (Hull)	2	1.3%
HX (Halifax)	8	5.2%
LS (Leeds)	6	3.9%
OL (Oldham)	1	0.65%
S (Sheffield)	14	9.2%
WF (Wakefield)	52	34.0%
Total	153	

11. The detailed locations of where PCS staff travel from is shown below in the heat map.

12. The 'heat map' shows the concentration of staff who travel to work from the Huddersfield area (42%), however it is not as clear in showing the 35% of the workforce who travel to work from the Wakefield area, as the WF postcode areas cover a wider geographical area, so the intensity shown on the 'heat map' is not as great.

13. Nevertheless, geographically, Grange Moor is central to the workforce, and a significant re-location of the company in any direction would result in a significant increase in journey to work time for approximately 50% of the workforce. This would create a major risk in terms of staff retention, leaving the company vulnerable to a shortfall in staff and skills, which would create a significant risk for the company to be able to function.

Fig 2 – PCS Travel to Work Survey Heat Map



SECTION 4: ALTERNATIVE SITES

14. Kirklees Council have asked that the applicant consider alternative sites to demonstrate that there are no suitable sites currently available to meet the applicant's requirements to expand their premises. In considering alternative sites we have assessed:

- Availability – is the site on the market, or will it be available in the short term? The applicant hopes to be in new premises by 2027. The business is already being constrained by lack of space. Further delays will impact on the business as well as allow competitors into the marketplace. This timescale allows for an 18-month construction period and 12 months to discharge planning conditions. If sites are not on the market now, these timescales are unlikely to be achieved.
- Tenure – The applicant wants freehold as it gives the business long term security. As the applicant believes the business is relatively secure financially, a freehold site provides more autonomy and reduces long term financial costs.
- Site area – We have set out above the applicant's space requirements.
- Workforce retention – This relates to the location of the business in relation to staff journey to work. If relocation of the company has a significant impact on commuter patterns there is a danger that staff will leave, resulting in a skills shortage for the business.

15. The planning statement submitted with the application assessed 9 sites that the applicant discussed with the Council's inward investment team which we have demonstrated to be unsuitable. The Council have asked the applicant to consider the following sites:

RAG rating key:

Red = absolute constraint

Amber = moderate constraint

Green = minor or no constraint

Local Plan Employment Allocations

Local Plan ID	Site Address	Site Area (HA)	Appraisal summary	Available	Tenure	Site Area	Workforce Retention
ES1	***Land south of Bradley Business Park, Dyson Wood Way, Bradley, Huddersfield***	4.76	Planning permission was granted in October 2018, the scheme was built out and occupied by the applicant and is not available.				
ES2	***Land to the north of H and E Fabrications Ltd, St Andrew's Road, Huddersfield***	1.29	Planning permission was granted in December 2015, the scheme was built out and occupied by the applicant (Polyseam) and is not available.				
ES3	***Land to the north and east of, 1-3, Greaves Road, Dewsbury***	0.68	This site is too small at 0.68 hectares. A building that meets PCS's requirements and car parking requires a site of 2.25 hectares. PCS's existing premises, that comprises two sheds and associated car parking is larger than this site at just over 1hectare.				
ES4	***Land south of, Tilcon Coal Yard, Bretton Street, Dewsbury***	0.83	This site is too small at 0.83 hectares. A building that meets PCS's requirements and car parking requires a site of 2.25 hectares. PCS's existing premises, that comprises two sheds and associated car parking is larger than this site at just over 1hectare				
ES5	***Land to the north, Crossroad Commercials***	1.82	This site is too small at 1.82 hectares. A building that meets PCS's requirements and car parking requires a site of 2.25				

	Ltd, Pheasant Drive, Birstall, Batley		hectares. The site is an irregular shape that lends itself to a number of smaller units rather than one large unit, particularly with the complex servicing arrangements required by the applicant with external servicing and storage, with dedicated recycling area. The site is not central to the workforce, doubling the journey to work distance from Huddersfield which has the greatest concentration of the work force				
ES6	***Land to the north and west of, The Royds, Whitechapel Road, Cleckheaton***	23.53	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. Whilst there is some uncertainty about the site's future as planning permission has recently been refused for the site, at the time site searches and appraisals were being undertaken, Amazon were being identified as the end uses. We believe the site is still under option by a Developer who may be looking to submit a new planning application for the site. If that agreement falls through the site would have to be developed on a piecemeal basis with a new planning application and				

			then if approved, infrastructure will have to be put in place before new premises for PCS could be constructed, as well as the wider highway improvements that have identified as part of the previous planning application for this site. This process would take too long and be costly for the client. Due to the scale of the site a master developer is required and its is not therefore being marketed as individual development plots. The scale, costs and timeframes associated with this site, means it is not suitable.				
ES7	***Former North Bierley Waste Water Treatment Works, Cliff Hollins Lane, Cleckheaton***	14.03	The site currently benefits from planning permission (Ref: 2016/92298) and has mainly been delivered. Phase 1 (Super B) is built and occupied, Units 1 & 2 (43,560 sq ft & 64,820 sq ft) of phase 2 have been delivered and are too small and not of the required tenure. Unit 3 (105,000 sq ft) has yet to be built. The last phase has planning permission (Ref: 2021/94208). Opus North have first option on the land and is not currently available. These are leasehold options and PCS are seeking freehold. The PCS travel to work survey shows that the main concentration for staff who work				

			for the company is in Huddersfield, with further concentrations in Wakefield, Ossett and Barnsley. The site on Cliff Hollins Lane would see most staff more than doubling their journey to work, which would be unsustainable. A relocation to this site would have a detrimental impact on staff moral and could well see many staff looking for alternative employment which could leave a skills deficiency within the company, as it could see many employers seeking to leave the company.				
ES8	***Land to the southeast of Spen Valley Industrial Park, Bradford Road/Rawfolds Way, Cleckheaton***	1.52	The site has been developed and comprises a number of units that are too small to meet the requirements for PCS.				
ES9	***Former Cooper Bridge Waste Water Treatment Works, Leeds Road, Mirfield***	8.49	The site is complex with significant remediation and infrastructure costs to bring the site forward for development. PCS would only require part of this site. A developer would be required to provide a comprehensive scheme for the site, which will include a new access into the site and mitigation to the wider highway network, as well as comprehensive site remediation. If these elements were sorted PCS could be interested in taking a unit on the site, however there is no developer interest in the site, and as a stand-alone site it is not viable for PCS.				

			The entire site sits within either flood zone 2 or 3, which causes considerable risk to the business. The constrains of flood zone 3 would require significant flood zone mitigation. This would restrict the useable development area, which would make the site unsuitable for PCS. This site has been purchased by John Cotton Group for their own expansion requirements. An outline application (2023/92448) has been submitted and therefore the site is not available.				
ES10	***Former Brook Motors Playing Fields, New Mill Road, Brockholes, Holmfirth***	1.49	The site is too small to accommodate premises required by PCS with the necessary parking and service yards. The location of the site would see most staff more than doubling their journey to work, which would both be unsustainable. A relocation to this site would have a detrimental impact on staff moral and could well see many staff looking for alternative employment which could leave a skills deficiency within the company, as it could see many employers seeking to leave the company.				
ES11	***Land at, Spinksmire Mill, Huddersfield Road, Meltham, Holmfirth***	3.82	A developer would be required to provide a comprehensive scheme for the site, which will include a new access into the site and mitigation to the wider highway				

			network, If these elements were sorted and the site was available freehold PCS could be interested in taking a unit on the site, however there is no developer interest in the site, and as a stand-alone site it is not viable for PCS. Furthermore, relocation to this site would have a detrimental impact on staff moral and could well see many staff looking for alternative employment which could leave a skills deficiency within the company, as it could see many employees seeking to leave the company.				
ES12	***Land west of, Honley Business Centre, New Mill Road, Honley***	2.93	The site is too small to accommodate premises required by PCS with the necessary parking and service yards. The irregular shape of the site means there is not reasonable plot to accommodate the requirements of PCS. The location of the site would see most staff more than doubling their journey to work, which would be unsustainable. A relocation to this site would have a detrimental impact on staff moral and could well see many staff looking for alternative employment which could leave a skills deficiency within the company, as it could see many employees seeking to leave the company.				

ES13	***Land north-east of, Bottoms Mill, Woodhead Road, Holmfirth***	2.05	The site has major constraints and is too small to accommodate premises required by PCS with the necessary parking and service yards. The location of the site would see most staff more than doubling their journey to work, which would be unsustainable, as more staff would be pushed to use a private car as their mode of transport. A relocation to this site would have a detrimental impact on staff moral and could well see many staff looking for alternative employment which could leave a skills deficiency within the company, as it could see many employers seeking to leave the company.				

Priority Employment Areas

16. Priority Employment Areas are identified areas where employment land and premises should be safeguarded against development that would see them used for non-employment generating uses. They have not been identified as sites/areas for development.

17. Notwithstanding this, in conjunction with the Council's Inward Investment Team we have analysed the allocated Priority Areas to assess whether there are any suitable sites within them. Development opportunities are scarce as PEAs are predominantly occupied by existing employers. The primary focus of the PEA policy LP8 seeks to prevent the loss of employment land to other uses.

18. The following sites have been assessed:

PEA12	***Syngenta, Leeds Road, Huddersfield***						
	Land to East of River Colne		Area appears to comprise vacant land with grassed plots and some parking. However, the site falls within the premises of Syngenta and due to the hazardous nature of operations and high security access, independent development within their ownership is unlikely at this time. Largest plot could potentially accommodate about 40,500 sq ft footprint				
	Land South of River Colne		Area of land appears to be a mixture of external storage and undeveloped land. There is no single large plot within this area. Primarily this area looks underutilised. However, the site falls within Syngenta and due to the hazardous nature of operations and high security access, independent development within their ownership is unlikely at this time. Largest plot could potentially accommodate about 18,500 sq ft footprint.				
	Land West of Dalton Bank Road and Nettleton Road		This covers a large area of land, which appears to be predominantly undeveloped. The area looks very underutilised. However, the site falls within Syngenta and due to the hazardous nature of operations and high security access, independent development within their ownership is unlikely at this time				

PEA14	***Leeds Road, Huddersfield*** Land opposite Canalside Sports Complex		Site owned by Huddersfield Town FC and developed as a training pitch. Site is not available.				
PEA16	***St. Andrews Road, Huddersfield*** Land bounded by Gasworks Street to the North and St Andrew's Road to the East		Site cleared and used as temporary match day parking. KSDL are in discussions with the Council regarding the purchase of the site. Site also falls within the Station to Stadium corridor and until these matters have been concluded the land is not to be promoted.				
PEA 46	***Oakwell Industrial Part, Centre 27 Business Park and Norquest Industrial Park, Geldered Road, Birstall, Batley.***		The planning application 2011/90489 was implemented. Area identified as potential development land is the woodland walk area which was part of the approval. It is assumed this woodland area supports staff welfare activities. Site has potential to be accessed via Holden Ing Way. However, it is unlikely to be available outside of expansion opportunity for the applicant Mars Petcare				
PEA 68	***Hartcliffe Mills, Wakefield Road, Denby Dale***		Area of vacant land with access to Barnsley Road. Land rises away from Z Hinchcliffe and Sons and has potential development plots east and west of the residential properties 131 -137 Barnsley Road. Footprint of buildings would be restricted due to slope and could equate				

			to no more than 40,000 sq ft which is the same size as PCS's existing premises				
PEA 82	***Hope Bank Works, New Mill Road, Honley, Holmfirth***		Most of the area is tree covered, with little space for development. The location of the site would see most staff more than doubling their journey to work, which would both be unsustainable. A relocation to this site would have a detrimental impact on staff moral and could well see many staff looking for alternative employment which could leave a skills deficiency within the company, as it could see many employers seeking to leave the company.				
PEA 87	***Jubilee Way, Grange Moor. Vacant land to the west of Ben Booth Lane***		Corner area of vacant land which falls within previous permission. Significant tree coverage and probably acting as screening for the rest of the business park. Plot stretches along road frontage creating a narrow and long linear parcel. If development of this plot could be supported it would be limited to an industrial unit footprint no larger than 45,000 sq ft. Access probably achieved by extending access road to car park. It will be surrounded by external areas of parking and functional yard space, as well as electricity intake substations.				

19. In summary the above table demonstrates a careful and comprehensive assessment of potential site opportunities has been undertaken. The conclusion of this site appraisal process has proven there are no sites within Kirklees, which are not within the

Green Belt, that meet the requirements of PCS. We believe therefore this assessment demonstrates a strong case for addressing the criteria of very special circumstances.

Appendix 3: PCS Staff Journey to Work Survey Results

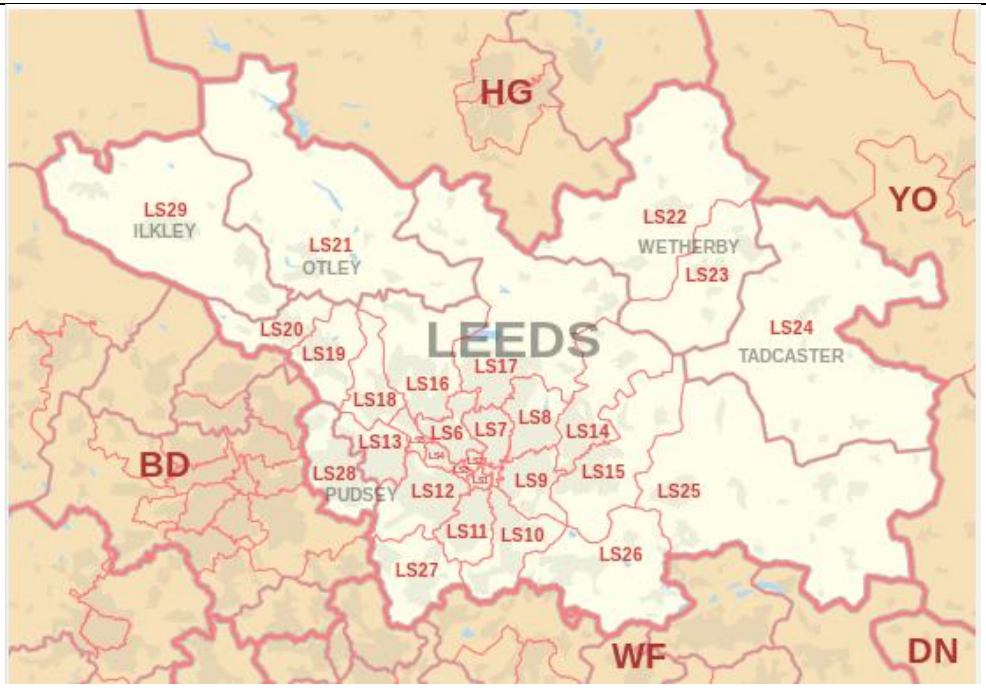
BD6	1	

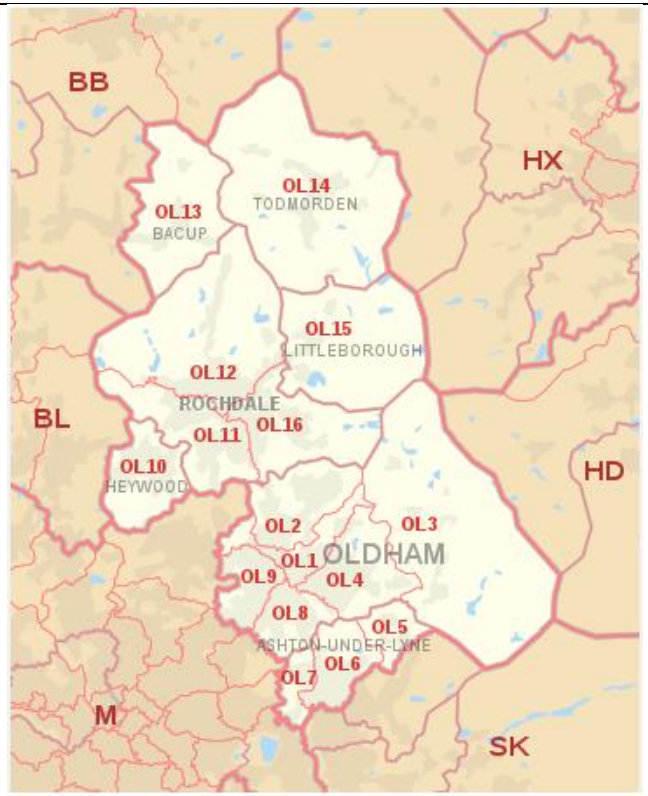
DN14	1	
DN17	2	
DN6	1	
HD1	9	
HD2	6	
HD3	6	
HD4	15	
HD5	9	

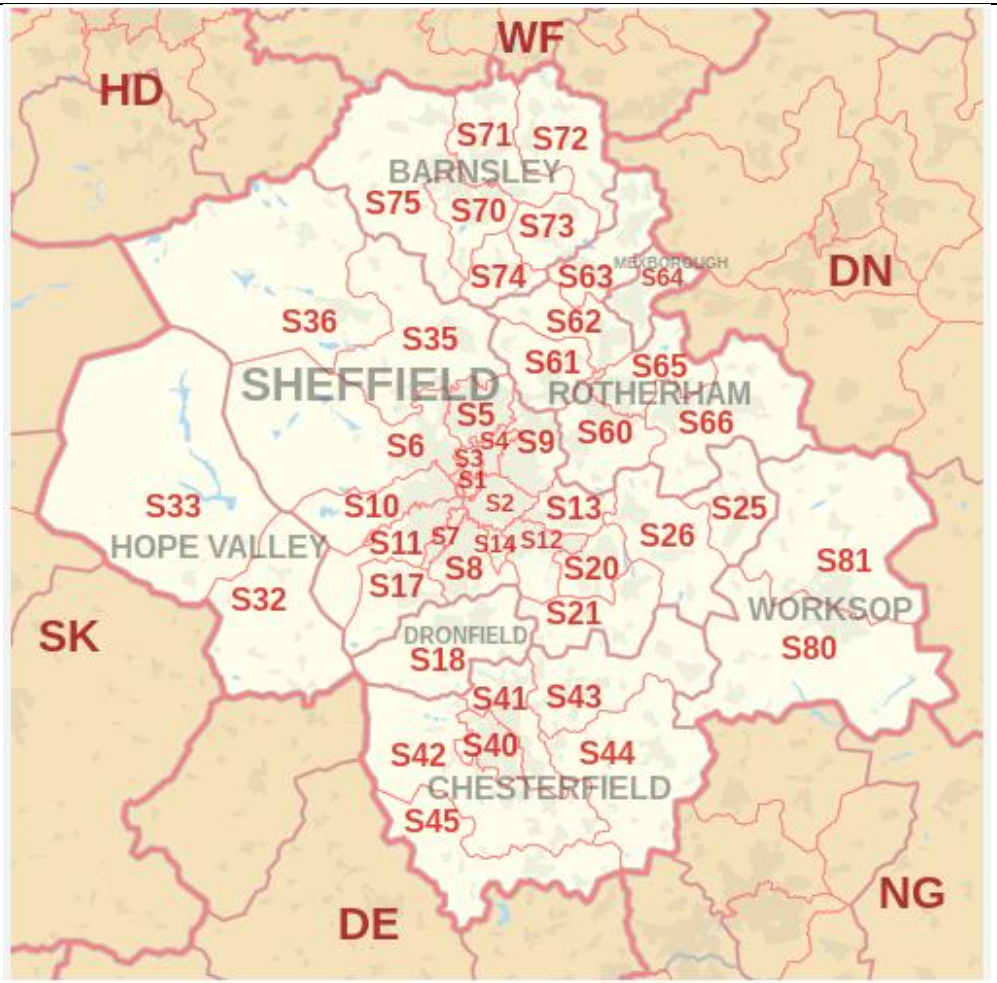
HD7	1	
HD8	14	
HD9	5	

HU15	2	
HX3	4	
HX4	1	

HX5	3	BB BD HX7 HEBDEN BRIDGE HX2 HALIFAX HX1 HX3 HX4 HX5 ELLAND OL HX6 SOWERBY BRIDGE HD
LS7	1	

LS12	1	
LS25	2	
LS26	1	
LS27	1	

OL9	1	
S35	1	
S5	1	

S70	5	
S71	3	
S75	2	
S8	1	
S9	1	
WF1	5	
WF10	1	

WF12	5	
WF13	2	
WF14	4	
WF15	3	
WF16	1	
WF17	3	
WF2	3	
WF3	2	
WF4	11	
WF5	6	
WF6	1	
WF7	1	
WF8	2	
WF9	2	
	153	