

Wood Nook Farm  
26 Wakefield Road  
Grange Moor  
WF4 4DS

20/4/2023

Dear Mr Gilbert

*Objection to Planning Application 2023/90668 – Erection of B2/B8 Industrial Unit and associated works - Grange Moor Coach Works, Barnsley Road, Grange Moor, Huddersfield, WF4 4DR.*

*My name is \_\_\_\_\_ and I have lived at Wood Nook Farm, 26 Wakefield Road, Grange Moor, WF4 4DS for over 68 years and am the third generation of my family to do so. I set up my own business here some 50 years ago trading as Grange Moor Garage.*

*I understand that a number of people have already submitted objections to the application (most notably \_\_\_\_\_ in a letter dated 19 April 2023) on matters including the planning history (including enforcement) of the site; its unauthorised uses; its deliberate degradation; pollution and noise control, including matters relating to HGV movements through Flockton; loss of residential amenity to nearby residential properties; flood risk; ecology; and drainage, including the lack of foul drainage. It is not intended to repeat or reiterate these matters here, except that I would want to strongly support the content of the letter from \_\_\_\_\_ and to confirm that my views below should be read in parallel with that representation..*

*I wish to object to planning application 2023/62/90668/E Erection of B2/B8 Industrial Unit and associated works at Grange Moor Coachworks, Barnsley Road, Grange Moor, Huddersfield WF4 4DR for the following reasons -*

### ***Principle of development***

*The Planning Statement that has been submitted with the application states that the site of the proposed development is within the green belt in the development plan (the Kirklees Local Plan 2019). Paragraph 147 of the National Planning Policy Framework ("the NPPF") states that -*

*"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".*

*The NPPF goes on, at paragraph 148, to state -*

*"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".*

*The applicant's Planning Statement, at paragraphs 82-97, considers the matter of the openness of the green belt and summarises a Landscape Visual Assessment (LVA) which has also been submitted with the application. To my mind, the principle of this LVA is flawed, in that it considers the issue of openness in terms of the impacts of the proposed use against the impact of the existing use - however, the existing sprawl of vehicles, plant and other paraphernalia is considered to be an unauthorised use ie it does not have planning permission for this use (irrespective of any enforcement action that may, or may not, have been taken by the Council to regularise the situation). As such, a LVA should have been produced which assesses the impact of the proposed use of the site against its authorised use, which is, for the purposes of the green belt, predominantly open land.*

*At paragraph 95, the Planning Statement states that "The LVA concludes that the application site does not play an important role in the function and integrity of the Green Belt **in its current arrangement**". This "current arrangement" is unauthorised and so any conclusions that can be drawn from the LVA are based on a flawed methodology of assessment. I believe that the proposed development therefore has a hugely significant impact on the openness of the green belt if the correct assessment methodology is used.*

*At paragraph 114, the Planning Statement lists possible "very special circumstances" that are considered to be pertinent in this case. As a result, the applicant has conceded that the proposed scheme represents inappropriate development in the green belt and so "substantial weight" must be given to any harm to the green belt. "Very special circumstances" will not exist unless the potential harm to the green belt is **clearly** outweighed by "other considerations".*

*The applicant has set out six "other considerations" -*

*1. The need for new employment land -*

*The Planning Statement sets out very brief details of the needs of the applicant in terms of new premises. No information is provided as to why their existing site at Grange Moor cannot be extended. No information is provided by the applicant in terms of a comprehensive Business Plan with financial detail that supports the subjective and brief statements contained within the Planning Statement and the Design and Access Statement in this respect, including statements such as those at paragraph 116 of the Planning Statement "The company currently employs 213 staff and intends to increase this number by a factor of 4 over the next few years based on current growth projections", paragraph 118 of the Planning Statement ", and, perhaps most worrying, the statement on page 14 of the Design and Access Statement that "When PCS leave their existing units, these will become available for other medium business' to lease". This last statement in particular is considered to undermine the applicant's premise that the proposed purpose-built development is required for their own purposes in order to sustain and expand their business. What would happen to the building and the site if the site was subsequently occupied by another business or businesses? What safeguards would be in place in terms of any intensification of the use of the site (vehicle movements etc)?*

*The Planning Statement then sets out the shortcomings of the Council's adopted development plan in terms of an alleged lack of appropriate employment land in South Kirklees. However, the fact remains that the Inspector who considered the "soundness" of the current development plan only four years ago, determined to remove the Clayton West proposed allocation and still found the Local Plan "sound". Without any Review of the Local Plan (see below), then the Local Plan "as is" must represent the up-to-date development plan for the area.*

## *2.Lack of preferable alternative sites -*

*Should the Council seek to provide new employment allocations in South Kirklees, then it should do so properly and in a planned way through a Review of the Local Plan, which ought to be in place by February 2024 (five years after the adoption of the Local Plan in February 2019). Presumably, this Review would highlight the problems of the alleged lack of suitable employment sites within South Kirklees and would propose new allocations to meet that need. Therefore, would it not be in the interests of "good planning" to wait for the outcome of the Review of the Local Plan, in order that ad hoc applications such as this one do not undermine the rationale for the Review?*

## *3.Alleged socio-economic benefits -*

*As welcome as the benefits of the proposal would be to the district, I would strongly suggest that the economic benefits referred to would occur wherever the proposed development was sited. There are no specific benefits that would accrue from the proposed development being situated in the green belt on an unallocated site and there are no specific reasons given as to why this site was chosen. A search of only nine sites (not including Priority Employment Areas) does not appear to be sufficient in terms of the number of sites considered for such a major development, particularly as it is proposed to be located in the green belt. There is no justification given as to why the proposed site needs to be so close to the company's existing site, so presumably there are other (brownfield) sites within urban areas in the district, either allocated for an employment use or not, that should have been considered in preference to the proposed site?*

*In terms of the proposed employment benefits, then without sight of a comprehensive Business Plan and financial costings etc, the projected number of employees etc is meaningless. Anyone can say "Oh yes, our business will increase to such an extent that I will be able to employ five times the number of employees that we have now". As such, I believe that the proposed socio-economic benefits are merely figures meant to entice the Council into a permission here, without any guarantees or sureties that such optimistic projections are realistic.*

## *4.The nature of the site*

*In their objection letter, \_\_\_\_\_ has accurately set out the planning position that the majority of the land in question has been deliberately degraded and does not benefit from any authorised planning position in relation to the existing sprawl of dismantled vehicles and other associated paraphernalia. As such, it cannot be asserted by the applicant that this part*

*of the site is "previously developed" because, clearly, not all of this site can be classed as such, given that the use is unauthorised.*

#### *5. Visual "improvements"*

*The applicant's arguments here centre around "clearing up" a (mostly) unauthorised use of the site by the provision of a huge new factory building. Whilst it is not the applicant's "fault" that the Council has not been able to secure or implement the appropriate enforcement action to remedy these unauthorised change of use breaches, nonetheless the applicant should not be able to "benefit" from the alleged deliberate degradation of the site. I would also suggest that it is a matter of opinion as to whether a large, grey, utilitarian factory unit, standing at 18m high and having a footprint of 7,350 sq m, and with all its associated hardstanding, lighting, and vehicle movements operating five days a week, is actually an "improvement" over what is there now. To my mind, it is not.*

#### *6. Clearance of contaminated land*

*Paragraph 149 of the Planning Statement suggests that paragraph 120 of the NPPF should give substantial weight to re-using brownfield (previously-developed) land. However, in this case, only a small part of the site is considered to be "previously-developed", with the use of the vast majority of the site being unauthorised. Any opportunity to remediate despoiled and degraded land should be sought by means of appropriate enforcement action (regardless of the owner's ability to pay).*

*To conclude, I would suggest that the submission of the proposed development is essentially flawed, in that the consideration of the principle of development is predicated on the notion that the whole site benefits from an authorised use (when clearly it does not) and that any development on this site must be an "improvement" on what is there now (when clearly it may not). This is also the position with the LVA, whose whole premise is based on an inappropriate baseline position. The submitted economic benefits of the case appear to be compelling but there is no evidence to substantiate the applicant's assertions in terms of employment numbers, business growth and expansion, and any related socio-economic benefits to the company or the wider community. The "search for sites" exercise conducted by the Council also looks similarly "thin" for such a large development proposal in such a sensitive green belt location.*

*As such, I believe that the applicant has failed to provide substantive evidence or justification that "very special circumstances" exist in this case, and certainly not to the extent that the high threshold for the very significant harm that would be caused to the green belt by reason of inappropriate development has been passed.*

*In light of the above I urge you to refuse this planning application.*

*Yours sincerely*