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Planning Statement

Proposed Drive-Thru,
Birstall Retail Park

DECEMBER 2023

Q220794

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1 Introduction

1.1 This Planning Statement supports a full planning application for the erection of two drive-thrus and a related commercial unit on land north of Woodhead Road, within Birstall Retail Park (“the Site”). The application is submitted on behalf of London Metric (“the Applicant”).

1.2 The description of development is as follows:

“Demolition of existing buildings; erection of a coffee shop with drive thru facility; erection of a drive-thru restaurant (Class E & Sui Generis); erection of a flexible commercial unit within Class E (a) and/or Class E (b) and/or hot-foot takeaway (Sui Generis) use; hard and soft landscaping works; modifications to access; and associated works.”

1.3 This Report considers the proposals against the applicable planning policy framework and other material considerations, concluding that they have considerable planning merit. Notably:

- The Site is underutilised, brownfield land which is supported for redevelopment in principle, particularly where this makes an efficient use of the site.
- Overall, there would be a net reduction in “main town centre” floorspace at the Site of c. 489.3sqm¹ arising through the demolition of the existing (larger) building and its replacement with the proposed development.
- New jobs will be generated during the construction and operational phases, with the latter estimated to create between 65 and 67 full-time equivalent positions.
- The sequential assessment is satisfied and the scheme accords with all other applicable planning policies.
- The proposals will incorporate sustainability measures including electric vehicle parking spaces, solar photovoltaic (PV) panels and a general positive approach to sustainable design and construction.

1.4 The remainder of this Planning Statement comprises the following:

- Section 2 outlines the relevant planning background, including the site description, planning designations and planning history.
- Section 3 summarises the proposed development.
- Section 4 outlines the relevant planning policy context and explains how the proposals satisfy these.
- Section 5 demonstrates compliance with the sequential assessment.
- Section 6 provides conclusions.

¹ The Site provides c. 980sqm of floorspace currently which is to be demolished and replaced by the proposals (490.7sqm GIA).

2 Planning Background

Site Description

- 2.1 The Site is located within the southern part of Birstall Retail Park, bound by Woodhead Road to its south and east, and Gelderd Road to its north. It includes a building formerly occupied by Chiquitos and Frankie & Bennys for restaurant use (Class E) which has been vacant since May 2023 and which provides c. 980sqm of floorspace.
- 2.2 To the south of the building, 93 surface level car parking spaces are included within the Site. Several trees define the site boundaries.
- 2.3 Access is from Woodhead Road to the south which is shared with a Taco Bell and KFC which sit to the west of the Site. East of the Site lies a mix of retail/food operators, including McDonalds, Krispy Kreme and Tim Hortons, beyond which is a Showcase Cinema. The majority of retail units associated with the retail park are to the north.
- 2.4 Land south of Woodhead Road is currently cleared and subject to a planning permission for a Lidl, Home Bargains and surface parking (ref. 2021/92528).
- 2.5 The location of the Site is shown in Figure 2.1 below:

Figure 2.1: Site Location



Planning Designations

- 2.6 The Site is not designated for any particular land use within the adopted Development Plan. It is located c. 1.75km from the nearest town centre (Birstall District Centre) and for the purposes of assessing main town centre uses such as those proposed, it is an out-of-centre location.
- 2.7 The Site is within a Minerals Safeguarding Area (MSA) for sandstone, clay and shale, alongside a High Risk Area for coal.
- 2.8 The Site is within Flood Zone 1 in its entirety, being an area at the lowest risk of flooding. No trees surrounding the Site are subject to protection via a Tree Preservation Order, and there are no heritage sensitivities within the Site or its immediate surroundings.

Planning History

- 2.9 There is no recent planning history of relevance at the Site.
- 2.10 Within the surrounding area, planning permission was granted in June 2021 to convert the former Pizza Hut restaurant to the east of the Site into a Tim Hortons, including the introduction of a drive-thru lane (ref. 2021/91208).
- 2.11 South of the Site beyond Woodhead Road, outline planning consent was granted in January 2020 (ref. 2018/92563) for c. 7,900sqm of retail floorspace. No reserved matters were subsequently progressed, and the consent has expired.
- 2.12 Revised proposals have since been progressed at the above land. A full planning permission (ref. 2021/92528) was granted for a Lidl store (2,231sqm GIA), a Home Bargains (2,280sqm GIA) and 175 parking spaces. Notably, the S106 heads of terms include contributions towards pedestrian crossing improvements in the surrounding area.

3 Proposed Development

3.1 The application proposes the following interlinked components:

- A drive-thru coffee unit of 167.2sqm (GIA) within the north-west of the Site, proposed for occupation by Costa Coffee (Class E & Sui Generis).
- A restaurant/drive-thru unit of 212sqm (GIA) within the south of the Site, proposed for occupation by Popeyes (Class E & Sui Generis).
- A flexible commercial pod unit of 111.5sqm (GIA) in the north-east of the Site, for retail (Class E, a) and/or restaurant/café (Class E, b) and/or hot-food takeaway use (Sui Generis).

3.2 In total, 490.7sqm of floorspace (GIA) is proposed by the application. Named tenants are included for the two drive-thru units, with the commercial pod unit being unnamed for an operator to assist with future marketing and letting.

3.3 All three units are proposed collectively and are an integral part of the planning application, providing complementary facilities to the surrounding retail park and maximising the efficient use of the Site.

3.4 Figure 3.1 shows the proposed site layout:

Figure 3.1: Proposed Site Layout



- 3.5 Reflecting the established commercial nature of the Site and surroundings, a range of materials are proposed to the units which include tenant specific requirements. Unit 1 (Costa) and Unit 3 (flexible commercial) would predominately comprise timber/timber effect cladding, render and glazing, reflecting their position adjacent to Gelderd Road. Unit 2 (Popeyes) would include branded elevations and colour palette, reflecting tenant requirements alongside the unit's position to the rear of the Site at a lower level.
- 3.6 The existing car park will be reconfigured to provide 50 spaces, being a net reduction of 43 spaces but in keeping with the proposed use. Three accessible parking spaces are proposed (1 per unit) alongside six additional enlarged spaces fitted within electric vehicle charging points. Seven cycle hoops (14 cycle parking spaces) are incorporated into the proposed layout.
- 3.7 Access would remain from Woodhead Road with some minor modification to widen the entrance in the south-west corner.
- 3.8 Twelve trees require removal around the Site's perimeter to accommodate the proposed development, of which ten are Category B trees and two are Category C trees. Fourteen new trees would be planted, equating to a net gain in two trees at the Site.
- 3.9 A new pedestrian link is included on the north-east boundary of the Site, providing a new connection with Woodhead Road. A small sub-station is included adjacent to this to serve the proposed units and electric vehicle parking spaces.
- 3.10 Each unit would have its own dedicated refuse area adjacent to the building.
- 3.11 Each building is designed to accommodate rooftop photovoltaic (PV) panels. Indicatively this could total 100sqm of coverage, being 30sqm on Unit 1 (Costa), 40sqm on Unit 2 (Popeyes) and 30sqm on Unit 3.
- 3.12 Twelve 1 metre lighting bollards and eleven 6 metre lighting columns would be included throughout the Site associated with the drive-thru lanes, pedestrian routes, site entrance and building entrances. These would ensure vehicular and pedestrian safety.
- 3.13 Advertisements and branding are shown indicatively within the proposals and would be subject to a separate application(s) in due course.

Costa

- 3.14 A typical Costa outlet of this nature will provide for 15 full/part time jobs, equivalent to 8 full-time equivalent positions. Standard operating hours of 05:00 – 23:00, 7 days a week are sought.
- 3.15 Plant is limited to air conditioning units and details are enclosed with the application.
- 3.16 Costa were found to be the most ethical coffee brand at both the 2017 European Coffee Awards and the 2017 and 2019 Allegra Strategies Awards. They have established the Costa Foundation which provides community support to 10 countries where Costa's coffee beans are

sourced from. In the last 13 years, the Foundation has delivered more than 80 school projects across 80 coffee growing communities alone.

- 3.17 Locally, Costa runs a successful Community Programme which gives every store the chance to plan meaningful projects in the local community, focussing on causes that matter to their staff and customers.
- 3.18 Costa's UK stores now divert 99% of their waste from landfill, with 60% being recycled. Internally, stores segregate food, plastics and cardboard from general waste and food waste is processed via Anaerobic Digestion as a biomass fuel source. Leftover waste is used as fertiliser for farmland. They also collect coffee cups and pods in store from any brand to encourage recycling.
- 3.19 Environmentally, Costa has a clear strategy to reduce energy in store through efficient light HVAC and equipment, leading on average to a 46% reduction in energy usage nationwide. Stores operate low energy equipment such as their Astoria coffee machine which uses 27% less energy than its predecessors, alongside low energy dishwashers which save both energy and water consumption.

Popeyes

- 3.20 A typical Popeyes outlet of this nature could provide for at least 80 full/part time jobs, equivalent to 52 full-time equivalent positions. Operating hours of 08:00 – 22:00, 7 days a week are sought. Details of plant and equipment are unknown at this stage, with these to be controlled via condition as required.
- 3.21 Commercially, Popeyes has established the Popeyes Foundation which is aimed at raising awareness and funds to strengthen communities with food and support. This extends to both staff members and the local community. Since 2018, the Foundation has partnered with a national nonprofit charity (No Kid Hungry) to ensure children have the food that they need to thrive, with more than \$1.7m being donated to this cause during this period.

Commercial Pod Unit

- 3.22 An operator is not named for the commercial pod unit, with a flexible range of uses sought to ensure flexibility with future marketing and letting. The proposed unit could generate between 5 and 7 new jobs².
- 3.23 Hours of use of 05:00 – 23:00, 7 days a week are sought. Details of plant and equipment would be tenant led and are unknown at this stage, with these to be controlled via condition as required.

² Calculated using the Employment Density Guide 3rd Edition, November 2015

4 Planning Policy and Assessment

Introduction

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan in this case comprises the Strategy and Policies Local Plan (adopted February 2019) and the Allocations and Designations Local Plan (adopted February 2019).
- 4.3 The relevant material considerations to be considered alongside this are the National Planning Policy Framework (NPPF) (September 2023) and the Hot Food Takeaway Supplementary Planning Document (SPD) (September 2022).
- 4.4 There are no emerging Development Plan documents of relevance at the current time.

Principle of Development

- 4.5 The NPPF gives “*substantial weight*” to using brownfield land, supporting the development of under-utilised land and encouraging multiple benefits from urban locations (Para. 120). Paragraph 119 also requires “*as much use as possible*” of brownfield land.
- 4.6 Planning decisions should also help to create conditions in which businesses can invest, expand and adapt. “*Significant weight*” is placed on the need to support economic growth (NPPF Para. 81).
- 4.7 The proposal is for a commercial use in an existing commercial area, in a location which is already established for main town centre uses. The Site is not subject to any specific land use designations and the principle of the proposal is entirely appropriate.

Main Town Centre Uses

- 4.8 The proposals comprise a main town centre use within an out-of-centre location. The NPPF (Para. 87) and Local Plan Policy LP13 require that the sequential assessment is therefore satisfied. This is addressed in Section 5.
- 4.9 The proposed floorspace (490.7sqm) is below the threshold whereby an impact assessment would apply to retail uses above 500sqm (Policy LP13). Notwithstanding, it is also relevant that any perceived impact would be further reduced given:
 - The Site is already established lawfully for main town centre uses.
 - There would be an overall net reduction in main town centre floorspace at the Site of c. 489.3sqm.
 - Not all of the proposed floorspace would be retail use to which the impact considerations apply, with a range of non-retail aspects included such as restaurant/café and hot-food

takeaway. These uses are not subject to any consideration of “impact” as confirmed by the NPPF (Para. 90).

Highways

- 4.10 The enclosed Transport Assessment confirms that the vehicular trips associated with the development can be accommodated on the highway network appropriately, and that the proposed layout is acceptable from a highways perspective. This includes a development which operates independently of, or cumulatively with, the emerging proposals to the south of the Site.
- 4.11 Policy LP24 encourages the provision of charging points to support the use of electric and low emission vehicles, although this does not prescribe any specific standards. The proposals include six electric vehicle charging spaces as part of the car park layout which is in line with the objectives of Policy LP24 and a positive aspect of the development's sustainability credentials.
- 4.12 Deliveries and servicing will take place via the car park which is a common approach for sites of this commercial nature.
- 4.13 The retained level of car parking is deemed appropriate, as is the quantum of new cycle parking incorporated into the public realm.

Design

- 4.14 The development comprises “good design” which is appropriate to the commercial setting of both the Site and surrounding area. The existing land is used efficiently with a high quality design, providing a form, scale and layout which respects the established character.
- 4.15 Sustainable design measures are incorporated into the development as noted below.
- 4.16 Policy LP24 (design) is therefore addressed.

Sustainability

- 4.17 Alongside the Council's strategic objective to transition towards a low carbon economy, Policy LP24 requires high levels of sustainability to be achieved through design (but recognising that this must be proportionate to a proposal).
- 4.18 The application is accompanied by the Council's Climate Change template which explains how the proposals are designed to be resilient to the effects of the climate changing, confirming:
- The proposed design adopts a fabric first approach and maximises the energy efficiency of the building fabric. To further reduce demand, each of the proposed units will include smart energy metering, energy-efficient LED lighting, and mechanical ventilation with heat recovery systems.
 - A number of measures will be adopted to reduce carbon consumption throughout the implementation and construction process where feasible. This includes but is not limited

to following the waste management hierarchy to minimise waste and the use of materials with long life and low levels of embodied energy.

- Each unit will utilise Solar Photovoltaic (PV) technology to generate renewable electricity.
- Each unit will be constructed with U-Values that would exceed the minimum requirement of Part L meaning that the energy consumption for each unit will be reduced.
- Existing biodiversity is retained through the retention of tree planting, vegetation planting and existing grassland. Further biodiversity is enhanced through proposed tree avenue planting, hedgerow planting and ornamental planting.
- A number of measures will be adopted to reduce air pollution for the proposed development, including but not limited to the use of locally sourced materials to reduce transport emissions and the installation of electric vehicle charging points.
- Costa's UK stores divert 99% of their waste from landfill, alongside a clear corporate strategy to use energy efficient measures throughout their operations.

4.19 The existing building is dated and inefficient in its layout. It's position within the Site is not conducive to the proposals, and it not possible to accommodate the proposed scheme through the retention or adaptation of the existing building.

Other Considerations

4.20 Tree removal is a necessary consequence of the development; however, an equivalent number of trees will be planted which will enhance the Site's visual appearance and support enhancements in biodiversity in line with Policies LP24 and LP30.

4.21 The Site is located within Flood Zone 1 and within an area at very low risk from surface water flooding. The proposed surface water discharge rate will be set at a maximum of 20.30 litres per second, being a 30% reduction in accordance with Kirklees Council's current guidance. Sustainable Urban Drainage Systems (SUDS) will be incorporated through the use of a geo cellular attenuation tank which is the most appropriate means in this case.

4.22 The application is supported by a Phase 1 Ground Investigation Report. This concludes that the Site is of low environmental sensitivity with a low/medium risk with respect to potential contamination. There are no insurmountable contamination constraints which would prejudice the proposed development.

5 Sequential Assessment

- 5.1 The NPPF confirms that all three buildings proposed by the application are main town centre uses for the purpose of the sequential assessment. Paragraph 87 confirms that this must consider whether any suitable and available sites exist to accommodate the development firstly in a town centre(s), then only if not suitable sites exist should edge-of-centre locations be assessed, followed by out-of-centre sites.

Case Law and Appeals

- 5.2 In applying the sequential assessment, regard must be had to relevant legal judgements and appeals. These have established that commercial decisions are genuine planning considerations that must be considered, with several court judgements highlighting the importance that developers and planning authorities operate in the “*real world*” and within commercial realities, ensuring that the approach does not fundamentally compromise a proposal.
- 5.3 The Supreme Court established through the Dundee judgement³ that if a site is not suitable for the commercial requirements of the development in question, then it is not suitable for the purposes of the sequential approach. This was reinforced by Inspectors at Rushden Lakes⁴, Sheffield⁵ and Stoke⁶ respectively, with the former identifying the Dundee judgement to be of “*seminal importance*”.
- 5.4 Providing that an Applicant has demonstrated flexibility within these commercial realities, then the question is:
- “...whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site” (Para. 29, Dundee judgement).*
- 5.5 The judgement at Dundee found that when considering the issue of ‘suitability’ an alternative site has to be suitable for the development proposed by the applicant, not some other form of development others may wish to see on the site.
- 5.6 It is therefore not appropriate to require the relocation of a proposal to a smaller, more central site that would not be able to deliver the necessary quantum of floorspace brought forward by the application proposals. Whilst there is a requirement to show flexibility when looking for more central sites, a balance needs to be struck between achieving a viable development, and one that adequately demonstrates flexibility.
- 5.7 The NPPF requires applicants to demonstrate flexibility on issues such as format and scale when undertaking the sequential assessment. This does not mean, however, that proposals

³ Tesco Stores Limited v Dundee City Council (Scotland), 21 March 2012.

⁴ Rushden Lakes Secretary of State Decision. Ref. APP/G2815/V/12/2190175.

⁵ Next decision in Sheffield Ref. APP/J4423/A/13/2189893.

⁶ Stoke decision Ref. APP/M3455/A/13/2195541

should be disaggregated into separate parts. Rather, where alternative sites are considered, their suitability should be assessed in terms of their ability to accommodate the form of development proposed by an application, having demonstrated flexibility in terms of scale and format.

- 5.8 The issue of disaggregation was addressed by the Planning Inspectorate and Secretary of State at a decision relating to Cribbs Causeway, Bristol⁷. The Inspector noted that, whilst disaggregation was explicitly adopted in previous (pre-NPPF) policy, this was not carried forward into either the NPPF or its accompanying Planning Practice Guidance (PPG). In Quod's view therefore, this is a telling omission and had the NPPF wished to continue a policy application of disaggregation, it would have done so by carrying this forward.
- 5.9 Despite recognising appeals where disaggregation was adopted (notably in Hill and Tollgate Village), the Inspector noted that these involved case specific circumstances, including specific policy wording and the availability of two allocated sites. Furthermore, the findings were not specifically endorsed by the Secretary of State (unlike the Bristol case).
- 5.10 Concluding their consideration of disaggregation, the Inspector to the Cribbs Causeway decision stated:

"As a general principle an approach that involved disaggregation does not seem to me to fit well with the Aldergate Properties or Warners Retail judgements referred to above. The town centre uses in the application proposals would comprise the retail and leisure uses and to divide them up would change the broad nature of the development in this case" (Inspector's Report, Paragraph 568).

- 5.11 In this case the three component parts of the scheme are intrinsically linked, providing a different offer within each building (i.e. coffee drive-thru, restaurant drive-thru and a flexible non-drive thru commercial unit). They intend to complement each other, and the wider retail and leisure offer within the retail park, making an efficient and effective use of brownfield land in line with national policy objectives.
- 5.12 To disaggregate the component parts would contradict the conclusions of the Inspectorate noted above and the findings of the *Dundee* judgement (amongst others), changing the nature of the development and fundamentally compromising the scheme so that it would be forced to fit an alternative site (in-part) elsewhere.

Planning Practice Guidance

- 5.13 The Planning Practice Guidance (PPG) provides further advice on the application of the sequential test, stating that it needs to be "*proportionate and appropriate for the given proposal only*"⁸.

⁷ Ref. APP/P0119/V/17/3170627.

⁸ PPG Paragraph: 011, Reference ID: 2b-011-20190722

- 5.14 The PPG also clarifies how locational requirements must be considered in the sequential assessment, stating⁹:

“Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.”

- 5.15 Essential to the application of the sequential assessment therefore is an understanding of the need the proposal is intended to serve, as this drives the location requirements.

Sequential Assessment

- 5.16 Considering the above, the sequential assessment must consider whether there are any suitable and available sites which can accommodate a development which is broadly similar to the application proposals, and not whether it can be disaggregated so that it could be accommodated on several different sites.
- 5.17 The two drive-thru units are intended to serve ‘pass by trade’ and custom already associated with Birstall Retail Park, rather than becoming destinations in their own right. The retail park is extensive in its scale and attracts a wide range of customers, whereby the level of established custom can support the proposals alongside the existing food and beverage offer which exists. This is reflected by tenant demand for the proposals.
- 5.18 It must also be recognised that the proposals replace two restaurant units at the Site, with a considerable reduction in floorspace prevailing from the development of c. 489.3sqm.
- 5.19 The Site is ideally located to meet the tenant interest in the Site, being well positioned to the highway network to serve passing trade alongside complementing the existing retail and leisure offer.
- 5.20 Ease of access from the highway is a fundamental requirement of a drive-thru scheme. Consistent with the PPG, it is a particular market and locational requirement that means a drive-thru can only be accommodated in specific locations such as retail parks next to major roads.
- 5.21 Town centre sites, for example within Birstall District Centre or Batley Town Centre, would be unable to meet this requirement as they would not be as easily accessible from the highway network.
- 5.22 It is also the case that the proposal would not easily fit within a town centre unit. The scheme in its entirety comprises three new buildings, alongside two drive-thru lanes, waiting bays for vehicles, parking (including electric vehicle charging) and landscaping. It is not a high street style proposal.

⁹ PPG Paragraph: 012, Reference ID: 2b-012-20190722

5.23 The unsuitability of drive-thru developments within town centres has been confirmed through an appeal by the Planning Inspectorate (ref. APP/00830/A/05/1182303), who noted:

“It is difficult to envisage how a developer could be flexible in respect of the format of a drive thru restaurant. Unlike a conventional restaurant...a drive thru, by definition, requires vehicular access and circulation through and around the building.”

5.24 It follows that, even if there are alternative sites within nearby town centres, these would not be suitable for the proposal because they would be unsuitable for the commercial realities of the case. Moreso, they would fundamentally compromise the scheme. There are also no identified edge-of-centre sites of relevance within the catchment of the Site.

5.25 Any alternative locations beyond Birstall Retail Park would also not satisfy one of the Applicant's primary business case objectives underpinning the proposals, which is to improve the on-site food and beverage offer for shoppers visiting Birstall Retail Park and complement the existing retail, leisure and food offer. Given that the proposed facility will largely serve an existing customer base, it is intrinsically linked to the existing function of the retail park.

5.26 This is a unique site-specific requirement and, when operating in the “real world”, providing the drive-thru elsewhere would fundamentally compromise the proposal as a consequence. To consider sites either in centre, or on the edge-of-centre, elsewhere would be a disproportionate application of the sequential assessment.

5.27 The inherent characteristics of the drive-thru operation in this case means that any alternative town centre site would not be suitable for the proposal.

5.28 The locationally specific principle has been tested at appeal in relation to a drive-thru facility at the out-of-centre Nugent Shopping Park, Bromley¹⁰. In this example, the Inspector concluded (Para. 16 of the Appeal):

“...there is strong potential for linked trips to be made, and on balance I consider that users of the unit would predominantly be customers who would come to the retail park anyway...”

5.29 Similarly, at an appeal in Springvale Retail Park¹¹, the Inspector agreed in principle with the “locationally specific” aspect of a drive-thru scheme, noting that it would meet a specific need generated by customers who already visit the wider retail park.

5.30 These appeals demonstrate the physical and functional link between an established customer base at a retail park and the ancillary/complementary service provided by a drive-thru.

5.31 For the above reasons, the sequential assessment is therefore satisfied.

¹⁰ Appeal reference APP/G5180/W/16/3143042, allowed 20 September 2016.

¹¹ Appeal reference APP/G5180/W/18/3213039, allowed 6 June 2019.

6 Summary

- 6.1 Full planning permission is sought for two drive-thru units and a standalone flexible commercial unit at underutilised brownfield land within Birstall Retail Park.
- 6.2 The units are inherently linked as part of the overall scheme, replacing a dated and inefficient building which already exist at the Site, and which is lawfully established for main town centre uses.
- 6.3 The proposals have considerable planning merit and satisfy all applicable planning policies, and in summary:
- The Site is previously developed brownfield land which is encouraged for redevelopment in principle.
 - The appropriateness of main town uses at the Site is already lawfully established.
 - There is a net reduction in “main town centre” floorspace at the Site of c. 489.3sqm¹².
 - New jobs will be generated during the construction and operational phases, with the latter estimated to create between 65 and 67 full-time equivalent positions. The proposals will incorporate sustainability measures including electric vehicle parking spaces and a general positive approach to sustainable design and construction.
 - The sequential assessment is satisfied, and the scheme accords with all other applicable planning policies.

The presumption in favour of development adopted by the NPPF is engaged and the proposals should therefore be approved without delay.

¹² The Site provides c. 980sqm of floorspace currently which is to be demolished and replaced by the proposals (490.7sqm GIA).



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