

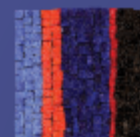
Planning Statement

Erection of an Ancillary Surface-Mounted
Storage Building

Mill Street East
Dewsbury
WF12 9BD

A W Lumb

MAY 2025



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1 Introduction

- 1.1 This Planning Statement accompanies a full planning application for the erection of an ancillary surface-mounted storage building at Mill Street East, Dewsbury on behalf of A W Lumb & Co Ltd.
- 1.2 This statement considers the site and its surroundings and summarises the planning policies which are material to the proposal, along with further guidance and evidence which has been considered.
- 1.3 The analysis addresses all the issues which we consider to be relevant to the determination of the planning application. It concludes that planning permission should be granted, having regard to the development plan and other material considerations.
- 1.4 This statement should be read in conjunction with the following plans and documents:
 - Site Location Plan
 - Proposed Plans and Elevations
 - Flood Risk Assessment (Ref: 85517R1)

2 The Proposals

2.1 The application description is as follows:

“Erection of an ancillary surface-mounted storage building anchored to existing hardstanding.”

2.2 A W Lumb is a builders’ merchant which supplies building materials to the trade and public. The company operates from two sites, including the site in Dewsbury, which offers on-site retail as well as storage and distribution of goods.

2.3 The site’s operating hours are Monday to Friday 06:30 – 17:00 and Saturday 08:00 – 12:00. There are 40 full-time employees at the site in Dewsbury. Both the operating hours and staffing levels will remain unchanged as a result of the development.

2.4 The company has identified a pressing need for additional sheltered space for the storage of building materials which are susceptible to weather damage.

2.5 The area of hardstanding where the building will be sited is currently used for external storage. The proposed building will make more efficient use of this area by providing weather protection and allowing for a greater range of goods to be stored in a secure environment.

2.6 The dimensions of the proposed building are as follows:

Internal

- 40.0m length x 20.0m width
- GIA: 800 sqm

External

- 40.4m length x 20.3m width x 4.6m height (eaves) / 8.6m height (ridge)
- GEA: 820 sqm

2.7 The building will be anchored to the existing hardstanding using shallow chemical anchor bolts. As such, **no intrusive groundworks or foundations will be required for the erection of the building.**

2.8 The building will be constructed from an aluminium frame, with light-grey steel cladding walls and a translucent-white PVC-coated polyester thermo roof. A sliding double door and a pedestrian access door will be included for vehicular and pedestrian access.

2.9 Site access for both pedestrians and vehicles will remain as existing directly off Mill Street East to the east.

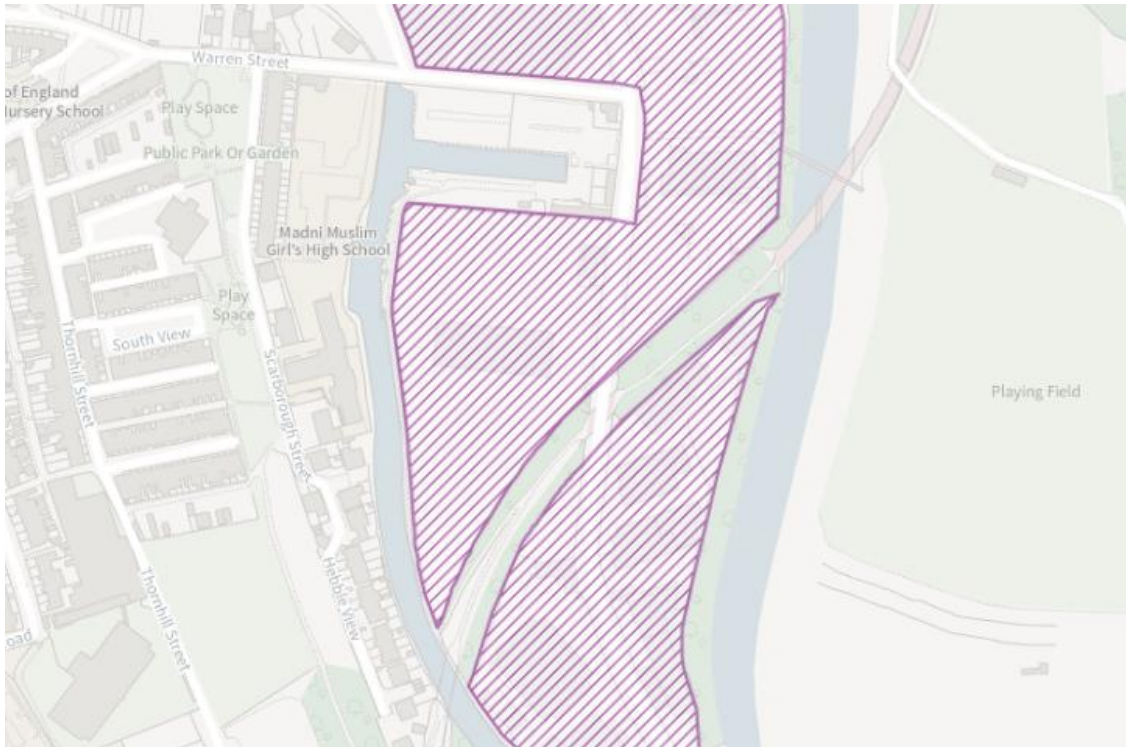
2.10 The design, materials, and prefabricated method of construction of the building will ensure a quick delivery and erection. This will minimise disruption to existing operations and allow the company to rapidly address its need for additional sheltered storage space.

3 Site and Surroundings

- 3.1 The application site is a 2.1 ha area of land which contains the main builders' merchant building in the centre of the site, with a large surrounding yard area used for external storage, internal access routes and parking.
- 3.2 The site is bound to the west by the Calder and Hebble Navigation Canal and towpath, to the east by Mill Street East and to the south by a disused former railway line. To the north is Savile Town Wharf and the Legger's Inn pub. There are neighbouring industrial and commercial premises to the south and east, and a school and housing to the west on the opposite side of the canal. The site's surroundings are therefore mixed in character.
- 3.3 The site is located in Dewsbury, to the south of the town centre. Further afield, the larger settlements of Wakefield and Leeds are located to the east and north-east respectively.
- 3.4 The application site consists entirely of an existing concrete surface and is void of natural or habitat features. As such, the development does not impact on any habitats and qualifies for the *de minimis* exception under biodiversity net gain legislation.
- 3.5 The entire site is located in Flood Zone 2, indicating a medium probability of fluvial flooding. As such, a Flood Risk Assessment has been submitted, the findings of which are summarised later in this Statement.
- 3.6 There are no heritage assets within a 0.5km radius of the proposals.
- 3.7 The site is located near to residential areas of Dewsbury and is accessible by both pedestrians and cyclists. In addition, there are bus stops located within short walking distance on Savile Road. These are served by the #230 and #280 bus routes, providing links to local destinations. Dewsbury Railway Station is also located within walking distance from the site, providing public transport links at a regional scale.
- 3.8 The site is also well connected to the surrounding road network. Mill Street East connects with the A644 which serves as a key arterial route through Dewsbury and links with the M1 and M62 to the east and west respectively.

Local Plan Designation

- 3.9 The application site is within an area designated as a Priority Employment Area in the Kirklees Local Plan Policies Map (February 2019).




 Priority Employment Areas

Figure 1: Extract taken from Kirklees Local Plan Policies Map (February 2019)

4 Planning Policy and Evidence Base

National Planning Policy Framework

- 4.1 The National Planning Policy Framework ('NPPF'; December 2024) sets out the purpose of the planning system of achieving sustainable development via three overarching objectives: **economic, social and environmental**.
- 4.2 Paragraph 11 of the NPPF requires Local Planning Authorities to apply a presumption in favour of sustainable development during decision-taking. This means that Local Planning Authorities should be:

"...approving development proposals that accord with an up-to-date development plan without delay; or ... where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) The application of the policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

- 4.3 In support of building a strong and competitive economy, paragraph 85 of the NPPF states that: *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."*
- 4.4 Paragraph 87 of NPPF also goes on to explain that planning policies and decisions should *"recognise and address the specific locational requirements of different sectors."* This requirement includes making provision *"for storage and distribution operations at a variety of scales and in suitably accessible locations."*

Local Policy

- 4.5 The local development plan consists of the Kirklees Local Plan Strategy and Policies (February 2019). Policies of direct relevance are outlined below.

Kirklees Local Plan Strategy and Policies (February 2019)

- Policy LP1 Presumption in favour of sustainable development

“When considering development proposals, the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.”

- Policy LP7 Efficient and effective use of land and buildings

“To ensure the best use of land and buildings, proposals:

a. should encourage the efficient use of previously developed land in sustainable locations provided that it is not of high environmental value;”

- Policy LP8 Safeguarding employment land and premises

“Proposals for development or re-development for employment generating uses (as defined in the Glossary) in Priority Employment Areas will be supported where there is no conflict with the established employment uses (as defined in the Glossary) in the area.”

- Policy LP24 Design

“Proposals should promote good design by ensuring:

a. the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape;

b. they provide a high standard of amenity for future and neighbouring occupiers; including maintaining appropriate distances between buildings and the creation of development-free buffer zones between housing and employment uses incorporating means of screening where necessary;

c. extensions are subservient to the original building, are in keeping with the existing buildings in terms of scale, materials and details and minimise impact on residential amenity of future and neighbouring occupiers;

d. high levels of sustainability, to a degree proportionate to the proposal”

5 Analysis

Principle

- 5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section (2) of the Town and Country Planning Act 1990, the application must be considered alongside prevailing development plan policies. In relation to this application, the development plan consists of the Kirklees Local Plan Strategy and Policies (February 2019).
- 5.2 The site is located in an area designated as a *Primary Employment Area* in the Local Plan Policies Map. **Policy LP8** states that employment development within these areas will be supported where it does not conflict with the established employment uses in the area. The proposed building will be ancillary to existing operations and will support the ongoing established use of the site as a builders' merchant.
- 5.3 The proposals are also supported by **Policy LP7**, which encourages the efficient use of previously developed land. The proposals will allow the company to make more efficient use of an area of an underutilised area of hardstanding to meet the company's changing operational needs.
- 5.4 As well as local policy, the development is supported by NPPF, in particular paragraphs 85 and 87. Paragraph 85 of the NPPF emphasises that *"significant weight should be placed on the need to support economic growth and productivity, taking into account the needs of local businesses"*. Paragraph 87 builds on this, stating that planning policies and decisions should *"recognise and address the specific locational requirements of different sectors"*. This requirement includes making provision *"for storage and distribution operations at a variety of scales and in suitably accessible locations"*.
- 5.5 The proposals will make efficient use of a previously developed area of land to allow the company to meet its operational needs more efficiently. In doing so, the building will support an important local business and employer which makes an ongoing contribution to the local economy.
- 5.6 The proposals are suitably located, compliant with national and local policy, entirely appropriate to the surrounding area, and will meet the needs of an established local business and employer. The proposals should therefore be supported in principle.

Development Management Considerations

Design and Layout

- 5.7 The siting of the building has been chosen to ensure the most efficient use of the site, allowing for continued use of existing access routes and easy access from the main building. The building will be

sited in an area currently used for storage, therefore the operational layout of the site will remain unchanged.

- 5.8 The proposed building is of a considerably smaller scale than the company's existing main building on the site. As such, the building will not materially change the character of the site when viewed in context, resulting in a minimal visual impact on the surrounding environment.
- 5.9 The building will be constructed from aluminium frame, with light-grey steel cladding walls and a translucent-white PVC-coated polyester thermo roof. The building will reflect the materials, colour palette and style of existing buildings on the site, as well as those used in surrounding industrial and commercial premises in the area.
- 5.10 The proposed development is well designed, in a manner which is appropriate to its surrounding context and respects the amenity of surrounding properties, meeting the ambitions of **Policy LP24**.

Parking, Access and Vehicular Movement

- 5.11 The storage building will be ancillary to existing operations on site. There will be no material impact on the volume and type of vehicular traffic leaving and entering the site. Access to the site will remain as existing for both pedestrians and vehicles off Mill Street East.
- 5.12 There will be no change to existing parking arrangements on site. The level of parking provision will not be impacted by the proposed development, nor will the number of employees or shift patterns. As such, existing parking provision will remain sufficient to accommodate staff and visitors with no impact on the surrounding highway network through on-street parking.
- 5.13 Main access to the building will be via a pair of sliding double doors on the southern elevation facing the yard. These will provide a 10m x 4m opening, allowing vehicles and pedestrians to access the building. There will also be a pedestrian access door on the eastern elevation.
- 5.14 As the area of the site where the building will be located is currently used for external storage, there will be no impact on areas used for vehicular access or manoeuvrability within the site as a result of the development.

Flood Risk and Drainage

- 5.15 A Flood Risk Assessment has been carried out by GeoSmart Information and submitted alongside this Statement (Ref: 85517R1). The report analysed flood risk at the site from all sources and has concluded that the residual flood risk from each source is negligible to low, subject to the following subject recommended mitigation measures:
- Finished floor levels should be set as high as possible above the existing floor levels and standard flood resistant and resilient design measures should be incorporated.

- Ground levels should aim to slope away from the building and the ongoing management of drainage networks should be undertaken in perpetuity with the development.
- Groundwater flood risk measures should be considered, including non-return valves on the sewer inlet.
- Site users should sign up to receive EA flood warnings and a Flood Warning Evacuation Plan should be in place to ensure that the site can be evacuated quickly in the event of a flood.

5.16 The building will be located on top of an existing area of hardstanding and finished floor levels will be raised as far as possible. In addition, stock will be stored on racking to avoid water damage in the event of water ingress. The proposed building will connect into the existing surface water drainage system on site.

Energy and Sustainability

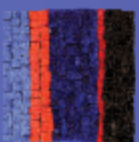
- 5.17 Due to the nature of the building and its proposed use, there is no requirement for machinery, heating, cooling or mechanical ventilation. As such, the energy usage of the building is limited primarily to lighting. The translucent roof allows light transmission, minimising the need for internal lighting during daylight hours and offsetting a large amount of the energy which would otherwise be required. As the majority of the site's operating hours fall within daylight hours and staff will occupy the building only for accessing goods, artificial lighting would only be necessary for limited periods.
- 5.18 In relation to material consumption, the modular, prefabricated approach to construction results in minimal waste from the construction process. The building components can be disassembled and reused elsewhere should the company's operational needs shift in future. This is flexible and inherently sustainable. Furthermore, as the building is surface-mounted, no groundworks or foundations are required for their erection, minimising the need for material consumption for the construction of the building. There will also be no water connection required so the building will not increase water consumption.
- 5.19 The construction period for the building will be less than one week, considerably lower than the equivalent period for a building of traditional construction, thus limiting energy consumption during the construction process.
- 5.20 Several aspects of the proposed building seek to minimise the environmental impact of the development by incorporating sustainable design features where possible. This ensures that sustainability is integrated into the development to a degree proportional to the proposals in line with **Policy DM24**.

Presumption in Favour of Sustainable Development

- 5.21 Paragraph 11 of NPPF outlines the presumption in favour of sustainable development which should be applied to planning decisions. This presumption is echoed by Local Plan Policy LP1. We have demonstrated throughout this statement that the proposed development mutually supports the objectives of sustainable development which are set out in paragraph 8 of NPPF, particularly in relation to the economic objective.
- 5.22 The proposed development will provide a flexible solution which supports the ongoing operation of an established business and local employer, allowing the company to meet its operational needs and secure its important contribution to the local economy.
- 5.23 With regard to the social objective, the building will support the employment use of the site, safeguarding employment opportunities for local people. The building will also improve working conditions for employees by providing a dry and secure area to access goods.
- 5.24 From an environmental perspective, the design of the building offers a flexible and inherently sustainable solution to meeting the company's short terms operational needs. The proposals also make efficient use of a previously developed area of land in line with wider sustainability goals.
- 5.25 The proposed development mutually supports the economic, social and environmental objectives and constitutes sustainable development. A presumption in favour of approval should therefore be applied.

6 Conclusion

- 6.1 This Statement has demonstrated that the proposals should be approved having regard to national and local planning policy, together with other material considerations.
- 6.2 The site is located in a *Primary Employment Area*, where appropriate employment development will be supported in line with Policy LP8. The proposed building will be ancillary to the existing use of the site and will not support its ongoing employment use. The proposals also meet the ambition of Policy LP7 by making efficient use of an underutilised area of hardstanding in order to meet the company's needs. The proposed development complies with relevant policies in the local development plan and should be supported in principle.
- 6.3 The proposals are also supported by the NPPF which refers to the significant weight which should be placed on supporting development of this kind, enabling local businesses to invest, expand and adapt.
- 6.4 The proposed development makes effective use of an area of previously developed land to provide a flexible solution allowing the company to continue meeting its operational needs. In doing so, the building will support an important local business and employer. The scale and ancillary nature of the building means that there will be no significant intensification or change to operations.
- 6.5 The scale, massing and siting of the building, as well as materials used are appropriate to the surrounding context and will result in a minimal visual impact.
- 6.6 The potential impact on matters including flood risk, heritage assets, natural features, parking, access and vehicular movement has also been examined, and it has been shown that the development will not negatively impact on any of these.
- 6.7 We have demonstrated that the proposals meet the sustainable objectives as set out in Paragraphs 8 and 11 of the Framework. The development will sustainably meet the operational needs of an established local business and employer.
- 6.8 The proposals are entirely appropriate and comply with relevant planning policy and guidance. There is therefore a compelling case for the granting of permission without delay.



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