

BS/5578/01(10 Oct 25)Huddersfield

Planning Services,  
Kirklees Metropolitan Council,  
PO Box 1720,  
Huddersfield, HD1 9EL



10 October 2025

Dear Sir/Madam

**WM MORRISONS FOODSTORE, PENISTONE ROAD, WATERLOO, HUDDERSFIELD, HD5 8QW:  
APPLICATION FOR FULL PLANNING PERMISSION AND ADVERTISEMENT CONSENT FOR A  
'WEBUYANYCAR' POD STRUCTURE.**

**Introduction**

We are instructed by our client, WM Morrison Supermarkets Ltd (Morrison's), to prepare and submit an application to Kirklees Metropolitan Council seeking full planning permission and advertisement consent.

The application relates to the siting of a WeBuyAnyCar pod structure, with affixed advertising, in the car park of the existing Morrison's foodstore at Penistone Road, Waterloo, Huddersfield, HD5 8QW. The modular pod structure would be ancillary to our client's existing retail convenience offering.

This planning application is accompanied by the following documents submitted via the Planning Portal and should be read in conjunction with this letter:

- Design and Access Statement, prepared by Whittam Cox (ref – 170285 rev. 01)
- Location Plan (ref – 170285\_079\_PL\_01)
- Proposed Site Plan (ref – 170285\_079\_PL\_02)
- WBAC 'Pod' Plans and Elevations (ref – WBACSOgV1 rev. 01)

**Site and Surroundings**

The application site is located centrally along the site's eastern boundary within the existing Morrison's car park, occupying three existing car parking bays. The proposed location of the WeBuyAnyCar modular pod benefits from good access via the existing access road (Penny Lane) to the northwest of the site while being located to the immediate northeast of the main Morrison's Foodstore building. The current white lines will be removed, and the area will be re-marked with new boundaries.

The Morrisons Foodstore site is located within the urban area of Huddersfield, which as described by the Kirklees Local Plan Strategy and Policies document is “an extensive urban area” with “a good range of shopping and leisure opportunities both in the town centre and retail parks”.

The proposed WeBuyAnyCar Pod will be located entirely within the existing Morrisons Foodstore car park, the surrounding landscape is of a mix of uses, with a large scale Use Class E(d) gym located to the site’s immediate north while a mix of three-story apartment blocks and townhouses are located to the site’s immediate south. The site is bound to its east and west by green infrastructure, with the Fenay Beck running along the car park’s western boundary while a linear forested area runs along the site’s eastern boundary, further low-density residential dwellings populate the landscape beyond this green infrastructure.

The application site is located within Flood Zone 2, where there is a medium probability of flooding from rivers or the sea. However, the proposed development is situated on previously developed brownfield land within the existing Morrisons car park and does not involve any increase in impermeable surfacing or alteration to existing drainage arrangements. As such, the proposal will not exacerbate flood risk on-site or elsewhere and is considered appropriate in this context. The development therefore accords with the principles of the NPPF, which seek to direct development to sustainable locations and ensure that flood risk is not increased as a result of new development.

The site is not within a Conservation Area, nor does it contain or is adjacent to any listed buildings. There are no trees subject to Tree Preservation Orders associated with the site.

### Planning History

The Council’s planning portal reveals the following on-site applications that are considered relevant to the application, this is referred to below:

Reference	Location	Description	Result
<b>94/61/91519/W3</b>	Penistone Road, Waterloo, Huddersfield	Erection of Supermarket, Petrol Filling Station with Car Wash, Associated Car Parking and Access Road	Approved 01/09/1994
<b>2016/62/93245/W</b>	Morrisons, Penny Lane, Waterloo, Huddersfield, HD5 8QW	Change of use of part of car park to car wash and erection of associated cabin,	Approved 26/10/2017

		canopy and flood lighting	
<b>2018/62/91233/W</b>	Morrisons, Penny Lane, Waterloo, Huddersfield, HD5 8QW	Installation of new retail unit	Approved 25/07/2018
<b>2018/62/93078/W</b>	Morrison's Supermarket, Penny Lane, Waterloo, Huddersfield, HD5 8QW	Erection of (A1/A3) drive thru' coffee shop with car parking, drive thru' lane, hard and soft landscaping, refuse area, and associated works	Approved 19/11/2018
<b>2022/64/92576/W</b>	Morrisons, Penny Lane, Waterloo, Huddersfield, HD5 8QW	Advertisement consent for installation of vinyl graphics on pod	Approved 21/12/2022
<b>2023/62/91690/W</b>	Morrisons, Penny Lane, Waterloo, Huddersfield, HD5 8QW	Erection of car windscreen repair facility (Use Class Sui Generis)	Approved 21/12/2023

### The Proposed Development

The proposed development by Morrisons involves the installation of a WeBuyAnyCar pod within the existing supermarket car park, providing a convenient service for the general public. WeBuyAnyCar offers customers a quick and straightforward alternative to private car sales, with online quotations followed by appointments at one of over 500 branches nationwide. The proposed pod will allow customers to combine vehicle transactions with existing shopping trips, thereby supporting sustainable travel patterns and making efficient use of an established retail site.

The proposal requires the addition of one prefabricated modular single-storey pod positioned within 3 existing parking bays. Moreover, to support business operations, WeBuyAnyCar will require 10 undesignated parking spaces to ensure that space is available for customers and so that regular collection can occur without overflowing onto the car park's adjoining areas. The undesignated parking spaces are located outside the usual customer parking area. The cars will stay on site for a maximum of 72 hours; however, this is generally a much shorter period. The purchased cars are removed from the site by individual vehicle collections.

By introducing a new pod on-site, the business will be able to expand its services and thus increase the current level of employment within this site. WM Morrison Supermarkets Ltd has confirmed that the WeBuyAnyCar service, which is highly valued by Morrisons customers, firmly aligns with their plan to bring more popular and useful services to the communities that they serve. No disruption to their normal operation will be generated.

The prefabricated modular single storey pod is constructed using high quality, environmentally efficient, factory-controlled construction techniques. The pod is sited on the edge of the existing parking area, allowing appropriate space to the front for customers / staff to exit the pod without entering directly into oncoming traffic.



*Image 1: Example image of WeBuyAnyCar Operation*

### **Policy Guidance**

The development plan for Kirklees Council is made up of The Kirklees Local Plan (adopted February 2019) and the Holme Valley Neighborhood Development Plan. The policies considered relevant to the proposals are:

**Policy LP3 – Location of New Development**

**Policy LP4 – Providing Infrastructure**

**Policy LP7 – Efficient and effective use of land and buildings**

**Policy LP8 – Safeguarding employment land and premises**

**Policy LP20 – Sustainable Travel**

**Policy LP23 – Core Walking and Cycling Routes**

**Policy LP24 – Design**

**Policy LP27 – Flood Risk**

**Policy LP28 – Drainage**

**Policy LP30 – Biodiversity & Geodiversity**

**Policy LP31 – Strategic Green Infrastructure Network**

**Policy LP38 – Minerals Safeguarding**

The site falls within the Lepton Neighborhood Plan development area which was designated in September 2018, the production of this Neighborhood Plan is currently on hold and therefore, is not considered to be a material consideration for this application.

The National Planning Policy Framework (2024) is also a material planning consideration that must be taken into account where it is relevant to a planning application. The following paragraphs are considered particularly appropriate to the proposed development:

**Paragraph 91 - Vitality of Town Centers**

**Paragraphs 115-117 – Considering Development Proposals re: Sustainable Transport**

**Paragraph 124 – Promotion of Previously Developed or ‘Brownfield’ Land**

**Paragraph 135 – High Quality Design**

**Paragraph 141 – Advertisements**

### **Planning Considerations**

#### Principle of development

This site is a long established retail site, providing essential grocery and automobile related services and direct employment to the nearby low-density residential community. Therefore, it is considered that the Principle of Development for the erection of a WeBuyAnyCar pod has been set by a historical precedent.

Kirklees Local Plan Policy LP3 further supports the Principle of Development for a WeBuyAnyCar at this location, stating that development should: reflect a settlement’s size and function; take advantage of opportunities for growth; and ensure opportunities for development within brownfield land are fully utilized. This site represents an opportunity for an enhancement in the commercial and employment utilization of an under-utilised brownfield site. Policy LP3 encourages proposals that reflect the size and function of the settlement, promoting regeneration and contributing to the provision of employment opportunities in accessible locations, this is further supported by NPPF paragraphs 8-9 which establish the development objectives to achieve sustainable development.

In this case, the application site forms part of the existing Morrisons car park and therefore constitutes previously developed land within the built-up area of Huddersfield. The proposal seeks to introduce a small-scale Sui

Generis use in the form of a WeBuyAnyCar pod, which will provide a convenient and sustainable service for the general public while generating direct local employment. The development will make efficient use of an underutilised part of the site, complementing the established retail use and contributing to the mix of services available to the local community.

Similarly, Policy LP7 and NPPF paragraph 65 support the efficient and effective use of underutilized land and buildings within sustainable locations. This proposal fully aligns with this policy by introducing a modest, service-based business that enhances the overall utility of the existing car park.

In addition, Policy LP8 of the Kirklees Local Plan relates to the safeguarding of employment land and premises. While the site is not designated as an Employment Allocation, the proposal constitutes an employment-generating use and is compatible with the existing commercial operations on-site. The development will not prejudice the continued functioning of the Morrisons store or neighbouring uses and therefore accords with the objectives of LP8, which seek to maintain and enhance employment opportunities across the district. As such, the principle of a small-scale commercial facility in this location is supported by local planning policy.

#### Design and Sustainable Construction

In design terms, the application site sits within a central area of the wider commercial setting and is visually contained, meaning the development will have only a limited impact on the character of the surrounding environments. The proposed unit adopts a modest scale, with elevations formed from composite panels incorporating company signage, as detailed on the submitted plans. The design and layout are therefore appropriate to the context of the site and consistent with existing uses in the locality.

Importantly, the modular pod structure is prefabricated to a high standard using environmentally efficient, factory-controlled construction methods. This approach ensures durability, adaptability, and efficiency while minimising waste and energy use. As such, the proposal accords with Policy LP24 of the Local Plan, which requires development to respond to climate change, respect local character, and achieve high-quality design.

#### Highways and Parking

The WeBuyAnyCar pod will be accessed using the same road infrastructure to access the Morrisons foodstore. No changes are proposed to be made to accommodate the proposed development. It is also not expected that there will be any single-use trips to the WeBuyAnyCar pod structure; trips will be linked to foodstore customer visits, which is the primary activity on site.

The site also benefits from access to sustainable transport opportunities, with regular bus services running along the neighbouring Penistone Road, allowing for the proposed development to utilise the existing public transport

network in line with Local Plan Policy LP20. The site is bound to the west by a Proposed Core Walking and Cycling Network, Policy LP23 proposes that this route provide an integrated system of cycle routes, public footpaths and bridleways across Kirklees, limiting any proposals which may prejudice the implementation of these routes. Although located within close proximity to this proposed route, the proposal will be constructed entirely within the existing car park and will have no impact on the viability of this route.

The loss of 2 parking spaces is deemed negligible regarding the overall capacity of the Morrison's store car park, which holds an existing capacity of 579 car parking spaces. The minimal loss of two parking spaces will not negatively impact the existing car park infrastructure or cause congestion within the car park. The proposal is therefore considered to be in accordance with the aims of Policy LP20.

#### Amenity

The WeBuyAnyCar Pod Structure will only be used for the sale of used cars and will not generate significant levels of noise. Furthermore, the proposed opening hours will reflect the Morrisons foodstore hours of operation. The proposal is, therefore, in line with the principles of NPPF paragraph 135(f).

#### Flood Risk

The application site lies within Flood Zone 2, where there is a medium probability of flooding from rivers and sea. In accordance with Policy LP27 of the Kirklees Local Plan and national planning guidance, the proposal has been assessed through a risk-based approach. The development relates to the installation of a small, single-storey modular pod within an existing, hard-surfaced supermarket car park, constituting previously developed brownfield land within the built-up area of Huddersfield. Given that the proposal makes use of existing impermeable surfacing and does not introduce any new impermeable surfacing that would alter site levels or drainage characteristics, it is considered to be appropriate within this location and will not increase flood risk on or off the site.

Although Environment Agency mapping identifies limited areas of surface-water risk within the wider Morrisons site, the proposed development area itself is not subject to surface-water flooding. The scheme will not result in the loss of any existing flood storage capacity or flow paths. In line with Policy LP28, the proposal does not increase the extent of impermeable surfaces and therefore maintains existing runoff rates. Surface water will continue to drain via the site's established drainage system, with no new positive connections required. Consequently, the development will have no negative impact on local water quality or flood risk, and SuDS measures are not necessary in this instance.

Overall, the proposal accords with Policies LP27 and LP28 of the Kirklees Local Plan and the NPPF, as it is located on previously developed land, represents a low-risk form of development, and ensures that flood risk is not increased elsewhere.

### Environment

This site falls within the 'Built-up Areas' Biodiversity Opportunity Zone as allocated by Local Plan Policy LP30, which aims for development proposals to include *"enhancement measures to reflect the priority habitats and species identified within the relevant Kirklees Biodiversity Opportunity Zone"*. As set out within this letter, these proposals involve the erection of a small pod within an existing car park, meaning that the proposal will have a negligible impact on any existing ecological value, these proposals constitute *"De-Minimis"* development and therefore, not being required to demonstrate biodiversity net gain in accordance with Policy LP30 and The Environment Act.

This site is also located within the 'Sand and Gravel with Sandstone and SCR' Mineral Safeguarding Area, which as per Local Plan Policy LP38, is subject to development limits to ensure the protection of minerals for present or future extraction. However, point 2b of this Policy establishes that proposals on sites of less than 1,000 square metres are *"unlikely to lead to the long term sterilization of viable mineral resources"*. Given the scale of this application and the nature of the proposal, which is located on a previously developed site, it is clear that these proposals will not affect the viability of future mineral extraction within this location as they are already sterilised and therefore, the proposals are in accordance with Policy LP38.

### **Conclusions**

The application adheres to all relevant policies and legislation. As such we respectfully request that this application is granted full planning permission without delay.

The appropriate fee has been paid via the Planning Portal to Kirklees Council via the Planning Portal (ref: PP-14372831). The fee was calculated using the most up-to-date information and has been submitted along with the application.

Should you have any queries regarding this application, please do not hesitate to contact Ben Sacarello via email at **Redacted** or telephone **Redacted** . We look forward to receiving receipt of your written confirmation of this letter, other drawings and included documents.

Yours faithfully,

Redacted

Ben Sacarello  
PEACOCK & SMITH