



PLANNING SUPPORT STATEMENT

APPLICATION FOR CHANGE OF USE OF
AGRICULTURAL STORAGE BUILDING
TO CARAVAN STORAGE (B8)

AGRICULTURAL STORAGE BUILDING ADJACENT TO
WOODHEAD VIEW,
PENISTONE ROAD,
UPPER CUMBERWORTH,
HUDDERSFIELD.
HD8 8YR.

MR AND MRS WATTS

DECEMBER 2025

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1.0 INTRODUCTION

The proposal which forms the subject of this planning application seeks the change the use of an existing agricultural building to caravan storage which is located adjacent to Woodhead View, Penistone Road, Upper Cumberworth, Huddersfield. It will be noted that the proposed change of use of the building will not result in any external changes to the subject building nor require any external works.

The application is supported by the following information:

- (i) Full elevation and layout plans – Stamford Geomatics;
- (ii) Planning Statement – Townsend Planning Consultants; and
- (iii) Highways Statement – Paragon Highways.

This statement is submitted to Kirklees Council in support of the application and to provide full information regarding the background to the application. It is considered that this statement will provide full information regarding the application to aid in the discharge of its development control function. Should the Council require any further relevant information, the applicants are willing to provide such additional information.

It is considered that this statement demonstrates to the Council that the proposal accords with the development plan and, when judged against this and all material considerations, including government guidance (the National Planning Policy Framework), it is clearly the case that planning permission for the change of use of this agricultural building to caravan storage is acceptable. The statement will demonstrate that notwithstanding the fact that the site is located in the Green Belt, the proposal can be seen to conform with policy and does not constitute “inappropriate development”. It is also demonstrated that there are no issues of harm.

The proposals will utilise the existing access from Penistone Road, which serves both existing residential and agricultural uses. A Highways Statement supports the application by Paragon Highways and demonstrates the suitability of the proposals. It is considered that in terms of traffic movements it is considered that the traffic impact of the proposed change of will be low and well within the capacity of the existing access and surrounding network.

The statement now proceeds to give details of the site and background to the application, including the planning history. The proposals for the site are then outlined in more detail. Relevant Development Plan Policy and Central Government advice in the form of the National Planning Policy Framework is then discussed. Following which the issues that the proposal raises (including the development plan context and all material considerations) are examined. Finally, the conclusion is reached that permission should be granted for the development to proceed.

2.0 BACKGROUND, THE SITE, THE PROPOSAL AND PLANNING HISTORY

The application site consists an agricultural storage building which is located off Penistone Road, to the west of the village of Upper Cumberworth. The building is constructed with concrete panels and stone to the frontage with steel sheet profile as well as to the roof.

On the 22nd December 2008 the Council granted planning permission for the “erection of agricultural building” (ref 2008/62/93996/E3). The building was subsequently constructed and constitutes the building subject of this application.

The building was and is still used by the applicants for the storage of agricultural machinery and produce including hay grown on their landholdings. The applicants no longer require the agricultural use of the building and intend to step back from active farming but seek to retain the building in beneficial use.

The proposal seeks to utilise the agricultural building for the storage of caravans. No external changes are required to facilitate the change of use nor is there a requirement to create any additional ancillary works. The building will therefore be converted as it stands and therefore there is no visual impact to the Green Belt in terms of the proposed change of use. There is no impact on the openness of the Green Belt.

From anecdotal evidence from enquiries for caravan storage, the applicant has identified that there is a local need for such a facility. Caravan storage is essentially a seasonal activity being used for winter storage. The capacity of the building is a maximum of 6no caravans and therefore traffic movements generated will be minimal.

The existing access to the building from Penistone Road will be utilised and remain unaltered, save for the minor relocation of the access gates to allow for a car and caravan to exit the highway. The application is supported by a Highways Statement by Paragon Highways.

It is considered that when considered in the context of the development plan and all material considerations the proposal is acceptable. Nevertheless, the applicant remains willing to discuss all details of the proposal with the Council.

3.0 PLANNING POLICY

By virtue of Section 38 (6) of the Planning and Compulsory Purchase Act 2004, the planning authority must determine the planning application in accordance with the statutory development plan (insofar as it is material to the application), unless material considerations indicate otherwise. The NPPF also advises of a presumption in favour of development which accords with the development plan. The importance of the statutory development plan in the decision making process necessitates an examination of the relationship between the policies and proposals of the plan and government guidance.

3.1 Central Government Policy Advice

It is considered that the following central government policy advice in the form of the National Planning Policy Framework and retained Circulars are relevant to the consideration of this application.

3.1.1 The National Planning Policy Framework

The following are comments on the advice in the Framework which is considered to be relevant to the consideration of the proposal:

Para 2 of the 'Introduction' sets out that:

“Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.”

At Para 8 it states:

“Achieving sustainable development means that the planning system has clear overarching objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a. An economic objective to help build a strong, responsive and competitive economy....***

- b. A social objective to support strong, vibrant and healthy communities... with accessible services and open spaces that reflect current and future needs and support communities' health social and cultural wellbeing.**
- c. An environmental objective to contribute to protecting and enhancing our natural built and historic environment.”**

The proposals meet the objectives by:-

- a) Economic – setting up of a new business to meet the needs of the local caravanning community;
- b) Social – assist in the keeping of caravans for storage which assist in the health and wellbeing of the customers who store them in the building; and
- c) Environmental – locating the caravans within a building rather than the storing them externally, at the customers home's.

Section 6 deals with 'Building a Strong Competitive Economy' and with regard to 'Supporting a Prosperous Rural Economy' at Para 88 it states:

“Planning policies and decisions should enable:

- a. The sustainable growth and expansion of all types of businesses in rural areas both through conversion of existing buildings and well designed, new buildings;***
- b. The development and diversification of agricultural and other land based businesses;***
- c. Sustainable rural tourism and leisure developments which respect the character of the countryside;***
- d. The retention and development of accessible local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.” (TPC underlining).***

The proposal seeks the reuse of an existing agricultural building to caravan storage. The change of use will provide a useful local service.

Section 13 deals with Protecting Green Belt Land. At Para 153 it states:

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

Para 154 states:-

“Development in the Green Belt is inappropriate unless one of the following exceptions applies:....

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:-....

(iv) the re-use of buildings provided that the buildings are of permanent and substantial construction;...”

It is therefore considered that the proposals, which involve the reuse of a building which is of permanent construction, constitutes appropriate development. As such the proposal does not constitute inappropriate development and therefore no very special circumstances need to be demonstrated to justify the development.

3.2 Local Planning Policy

3.2.1 Kirklees Local Plan

The Development Plan for the Kirklees District is the Kirklees Local Plan (2019). The site on the supporting proposals map is identified as being wholly within the Green Belt. The following policies and section of the document are relevant to the proposals.

(i) **Policy LP10 – Supporting the Rural Economy**

The policy supports the improvement of the economic performance of the rural economy. The policy also sets out that where development is proposed in the Green Belt regard must be had to the relevant policies in the Local Plan and relevant national planning policy.

(ii) **Policy LP21 – Highways and Access**

The policy sets out that proposals should ensure safe and secure access amongst other requirements. This has been demonstrated by the supporting highways statement.

(iii) Policy LP22 – Parking

The policy relates to parking for new development. The proposal provides sufficient parking.

(iv) Policy LP24- Design

The policy is a general design policy which is a checklist for all developments to ensure good design. It is considered that proposal which seek to utilise and existing building with no proposed or existing changes does not conflict with the requirements of this policy.

(v) Policy LP60 – The Re-Use and Conversion of Buildings

The policy relates to the reuse and conversion of buildings. The policy sets out that:-

- “a. the building to be re-used or converted is of a permanent and substantial construction;*
- b. the resultant scheme does not introduce incongruous domestic or urban characteristics into the landscape, including through the treatment of outside areas such as means of access and car parking, curtilages and other enclosures and ancillary or curtilage buildings;*
- c. the design and materials to be used, including boundary and surface treatments are of a high quality and appropriate to their setting and the activity can be accommodated without detriment to landscape quality, residential amenity or highway safety”.*

In relation to the requirements of the policy:-

- a. The proposals seek the reuse of the building with no internal or external alterations required;

- b. There is no requirement for parking; and
- c. The building will remain as existing. The site is already benefits from visual screening from existing trees. The proposed use is considered low key and will therefore not impact on residential amenity nor highways safety. A supporting highways statement demonstrates the suitability of the proposals.

4.0 THE ISSUES – THE DEVELOPMENT PLAN AND OTHER MATERIAL CONSIDERATIONS

4.1 The Development Plan

The Development Plan is the starting point for the consideration of this application. It has been clearly demonstrated that the proposal complies wholly with the relevant policies of the Development Plan. The applicant is therefore entitled to expect the presumption inherent in Section 38(6) to be weighed in his favour. It now falls for the matter to be considered in the context of all relevant material considerations which are explored further below.

4.2 Other Material Considerations

4.2.1 Green Belt

It is considered that by reference to the NPPF (Para 154) that the proposals which seek the reuse of a building that is of a permanent and substantial construction does not constitute “inappropriate development” in a Green Belt and, therefore, “no very special circumstances” need to be demonstrated to justify the development.

The proposal maintains the openness of the Green Belt does not conflict with the purposes of including land within the Green Belt.

4.2.2 Visual Impact

The proposal is for the re-use of an existing agricultural building and does not involve any changes to the appearance of the building nor does it require any external changes such as additional parking areas to be created. Therefore, the proposal cannot have any adverse impact on the openness or character of the green belt.

4.2.3 Rural Enterprise

This application seeks planning permission for the change of use of an existing agricultural building to caravan storage. By reference to both local and national policy, proposals for the expansion of an existing business in the green belt are encouraged to support the local rural economy.

4.2.4 Highways

The application is supported by a Highways Statement by Paragon Highways, which the proposal will create no issues in relation to highways safety with the low levels of traffic, well within the capacity of the existing access and surrounding highways network.

4.2.5 Business Operation

Due to the limited times caravans are required, it is anticipated that the proposed use will be a very low traffic generator. The business will operate on a booking system for customers to retrieve and deliver their caravans as to avoid multiple customers attending the site at once as well as caravans being collected and dropped off during standard operating hours.

4.2.6 Biodiversity Net Gain – De Minimis Exception

The application proposals seek the change of use of the building with no additional hardstanding required to facilitate the change of use. The proposals would therefore fall within the “de minimis exemption”.

The Planning Practice Guidance note on Biodiversity net gain sets out at Paragraph 4 (Ref ID: 74-004-2024-214) the de minimis exemption applies if:-

- “the development must not impact on any onsite priority habitat; and
- if there is an impact on other onsite habitat, that impact must be on less than 25 square metres (e.g. less than a 5m by 5m square) of onsite habitat with a biodiversity value greater than zero and on less than 5 metres of onsite linear habitat (such as a hedgerow)”.

In addition it further goes on to state that the exemption covers:-

“Change of uses to development where there is no or only a de minimis impact on onsite habitat.”

Therefore Biodiversity Net Gain does not apply in this instance.

5.0 CONCLUSION

This application seeks the change of use an agricultural building to caravan storage. The proposal does not require any alterations to the building and the existing form, height and nature of the building will remain with the new use.

It has been demonstrated by reference to the NPPF that the proposal does not constitute inappropriate development. It is clear from both local and national policy that the proposed use is acceptable within the green belt.

It is considered that the proposal conforms with the development plan as set out in this statement and, therefore, the presumption inherent in Section 38(6) of the Act must be weighed in the applicant's favour. It is demonstrated that the proposal does not give rise to any issues of harm and as such, in the absence of harm, there are no issues to outweigh the presumption. It is considered, therefore, that planning permission should be forthcoming.