

PLANNING STATEMENT

Unit 4a, Netherfield Mill

Off Netherfield Road

Ravensthorpe

Dewsbury

WF13 3JY

Proposal

Change of use of existing disused storage space to form a dark kitchen / ghost kitchen (Sui Generis), and installation of an extraction flue to side (Retrospective retention of window and decking to front).

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Contents

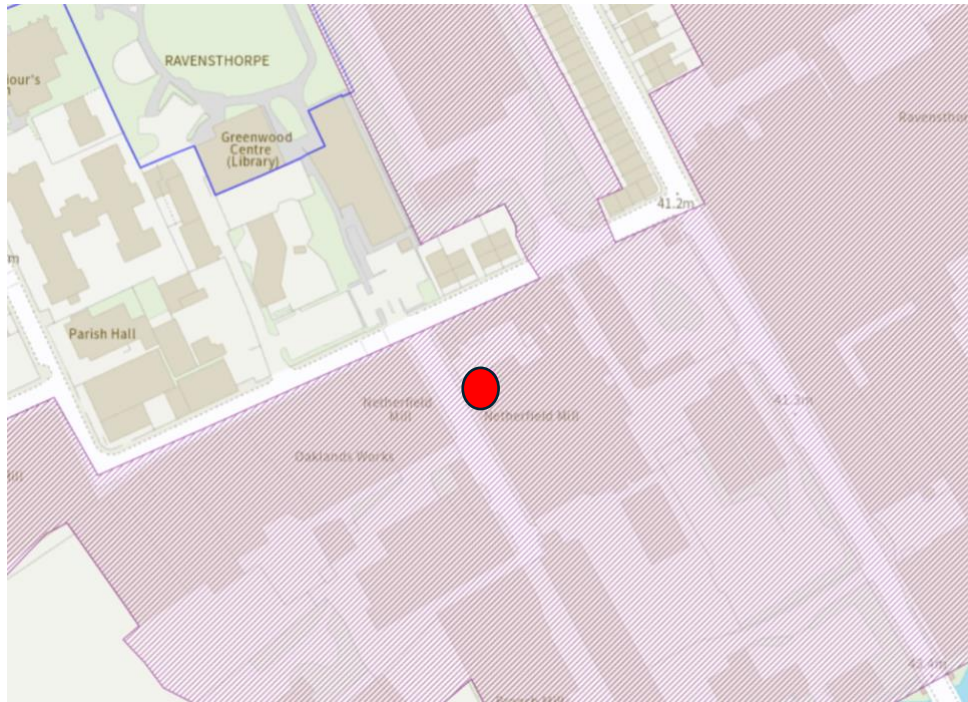
	Page
1. Introduction	3
2. Site and Surroundings	4
3. Proposed Development	7
4. Involvement	9
5. History	10
6. Relevant Planning Policy	11
7. Assessment	14
8. Conclusion	21

1.0 INTRODUCTION

- 1.1 This Planning Statement is submitted by 'Planning Management Ltd' on behalf of the applicant in support of a planning application for a change of use and associated physical alterations at Unit 4a, Netherfield Mill, positioned off Netherfield Road, Ravensthorpe, Dewsbury, WF13 3JY.
- 1.2 This portion of the Netherfield Mill building is currently empty and has been disused for a number of years. Historically, it served as ancillary storage space for the bedding company that continues to occupy a portion of the adjacent factory building.
- 1.3 The application involves both completed and proposed physical components:
- Retrospective Retention (Front Elevation): Retention of a window and timber decking area already installed to the front of the property.
 - Proposed Installation (Side Elevation): Installation of a commercial ventilation extraction flue routed vertically along the side elevation, terminating exactly 1 metre above the eaves line to facilitate safe atmospheric dispersal.
- 1.4 The site is positioned sustainably within the established settlement boundary of Dewsbury and rests in an established industrial commercial sector.
- 1.5 In alignment with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the strategic vision of the Kirklees Local Plan (adopted February 2019), and the Kirklees Hot Food Takeaway Supplementary Planning Document (SPD) (adopted September 2022), this statement demonstrates that the proposal represents a highly sustainable, employment-generating commercial use. Crucially, because the business operates purely under a delivery-only ghost kitchen / dark kitchen model, it circumvents the standard negative material impacts associated with traditional walk-in takeaways while positively aligning with the Council's health, wellbeing, and economic objectives.

2.0 SITE AND SURROUNDINGS

- 2.1 The application site relates to Unit 4a, forming part of an existing industrial building cluster at Netherfield Mill, accessed off Netherfield Road. The property features a secure yard area of hardstanding directly to the front and north of the industrial premises. Access is taken off the highway network via an unadopted private approach road, moving through a secure entrance layout, where turning and parking spaces are safely contained within the wide unadopted road.
- 2.2 The application building is of single-storey height, blockwork construction, and is a later lean-to addition to the main mill structure under a corrugated sheet roof.
- 2.3 The surrounding locality is heavily industrial and commercial in character. To the North & East is the overarching commercial fabric of Netherfield Mill, occupied by light industrial operators, warehouse units, and trade counters. The south includes active commercial yards, including vehicle repair workshops and distribution uses. Whilst the area to the west includes heavy industrial boundaries and commercial compounds, bound by a protective buffer zone of mature trees and solid industrial blocks.
- 2.4 Crucially, the application property is located within an allocated Primary Employment Area on the Kirklees Council Proposals Map. It is not situated within a designated Conservation Area, does not constitute a Listed Building, and is not locally listed by the Authority.



Above: Image taken from the Local Plan Proposals Map; The application site (red circle) is located within the urban boundary in a mainly industrial area allocated as a 'Priority Employment Area' (pink hatching).



Above: Aerial image indicates the application site and also shows the variety of industrial and commercial uses in the vicinity of the site.



Above: Images indicate the application site and also shows the window installed with black shutter and decking area (pickup) for delivery drivers.



3.0 PROPOSED DEVELOPMENT

- 3.1 Full planning permission is sought to change the use of the single-storey storage facility (Class B8) to a dark kitchen / ghost kitchen unit (Sui Generis).
- 3.2 The unit will operate as a single kitchen facility preparing traditional Indian/Pakistani dishes, and healthy foods such as paninis, stir fries, grilled chicken wraps, jacket potatoes etc. Operating strictly as a delivery-only model, members of the public will place their orders exclusively online or by telephone. Absolutely no members of the general public will attend the site, completely eliminating customer vehicle traffic, waiting crowds, over-the-counter friction, and late-night street loitering typical of standard hot food takeaways.
- 3.3 The dark kitchen will operate a flexible logistical model to optimise service delivery. The business will utilise its own dedicated delivery drivers, who will be based on-site during operational hours. To supplement peak demand, the operation may also utilise third-party online delivery companies (such as Deliveroo, UberEats, or JustEat).
- 3.4 The front window provides crucial daylight to enhance the working environment for staff. The front timber decking creates a structured, safe, and clean courier holding and waiting area. This is custom designed to manage both the business's own drivers and third-party couriers, ensuring all riders remain organised within the private site boundary without causing localised congestion on the approach road.
- 3.5 Odour control will be managed via a new commercial extraction duct. The flue will run flush along the side elevation, extending 1 metre past the eaves to ensure high-velocity atmospheric clearance away from localised structures.
- 3.6 The proposed opening hours are:
- Monday to Thursday: 08:00 AM to 10:00 PM
 - Friday, Saturday, and Sunday: 08:00 AM to 11:00 PM



- 3.7 The venture will actively contribute to the economic purpose of the employment allocation by creating 3 new full-time jobs for local staff members. Designated commercial bin storage will be maintained securely to the side of the building within the yard area, out of direct public view.

4.0. INVOLVEMENT

- 4.1 No formal pre-application advice in this instance has been sought from the Council. The scheme put forward is an acceptable proposal providing quality development in this area whilst bringing a mainly disused property back into a viable use.
- 4.2 This planning Statement has been submitted as part of the planning application to provide a reasoned justification for its acceptability using local and national planning policy and guidance.
- 4.3 The issues of highways safety, amenity of the surrounding area, design and the principle of the development are taken into consideration in the assessment below.



5.0 HISTORY

- 5.1 A history check has been undertaken which has revealed no specific planning history for the site.

6.0 RELEVANT PLANNING POLICY

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that decisions should be made in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 The statutory Development Plan for Kirklees is the Local Plan (adopted 27th February 2019). It states that ‘Our vision needs to consider what Kirklees should be like in the future if the needs and aspirations of those who live, work in, or visit Kirklees are to be met whilst retaining the characteristics that make it attractive and distinctive. It also needs to be flexible to allow us to respond to future challenges in a way that is right for Kirklees and its residents and businesses.’
- 6.3 The statement vision for Kirklees is that people will have access to a range of local facilities including services, health-care and education provision, and adequate infrastructure. Places will be well-connected encouraging sustainable travel including increased opportunities for walking and cycling and improved links to other parts of the Region and beyond.
- 6.4 The following Local Plan policies have relevance to the proposal:
- Policy LP 01 (Achieving Sustainable Development): Sets out a positive approach and a presumption in favour of sustainable development.
 - Policy LP 02 (Place Shaping): Demands development that contributes to local distinctiveness and a safe, healthy environment.
 - Policy LP 03 (Location of New Development): Prioritises the sustainable reuse of urban brownfield land and existing structures within industrial settings.
 - Policy LP 07 (Efficient Use of Land and Buildings): Promotes maximising the utility of underperforming or empty employment spaces.
 - Policy LP 08 (Safeguarding Employment Land and Premises): Governs development within Primary Employment Areas, ensuring business uses contribute to employment generation.

- Policy LP 16 (Food and Drink and the Evening Economy): Restricts adverse evening economy impacts on residential amenity while supporting diverse food and drink operations.
- Policy LP 21 (Highway Safety and Access): Mandates that developments maintain the safe and efficient flow of traffic.
- Policy LP 22 (Parking): Requires adequate parking provision relative to the scale and use of the building.
- Policy LP 24 (Design): Insists on high-quality architecture that respects townscape character and secures a high standard of amenity.
- Policy LP 47 (Healthy, Active and Safe Lifestyles): Outlines the council's framework for integrating health and wellbeing targets into the built environment.
- Policy LP 51 & LP 52 (Air Quality & Environmental Protection): Dictates that potential noise, vibration, and odour pollutants must be fully evaluated and mitigated to safe, acceptable levels.

6.5 Kirklees Hot Food Takeaway Supplementary Planning Document (SPD) (2022):

- Considers the impact of hot food takeaway uses on health and wellbeing, over-concentration/clustering, proximity to schools (400m exclusion zones), highways safety, and environmental impacts (noise/odour).

6.6 NPPF (2026)

- **Paragraph 96** (Chapter 8): Strongly encourages decisions that enable and support healthy lifestyles, focusing on access to high-quality, healthier food options to meet local health and wellbeing goals.
- **Paragraph 115:** Clear mandate that developments should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- **Paragraph 130:** Instructs that layout and design must generate safe, inclusive, and visually attractive environments that protect a high standard of amenity.

National Planning Practice Guidance (NPPG)

- 6.7 The government published its NPPG on 6 March 2014. This is intended to complement the NPPF and to provide a single resource for planning guidance, whilst rationalising and streamlining the material. Almost all previous planning Circulars and advice notes have been cancelled. Specific reference will be made to the NPPG or other national advice in the Analysis section of the report, where appropriate.

7.0 ASSESSMENT

Principle

- 7.1 The conversion directly satisfies Policies LP 01, LP 03, and LP 07 by bringing a long-term vacant, disused commercial storage building back into active economic use within an established industrial mill complex.
- 7.2 Critically, as the site is allocated within a designated Primary Employment Area, Policy LP 08 applies. The proposed ghost kitchen aligns seamlessly with this objective by transitioning a passive, empty storage unit—which previously yielded zero permanent full-time jobs—into an active employment-generating enterprise that will immediately create 3 new full-time jobs for local staff members.
- 7.3 Beyond direct job creation, the facility will provide food services to the numerous businesses occupied within the larger industrial estate. By operating from 08:00 AM onwards, the kitchen will cater directly to local workers for lunch breaks and daytime meetings. This introduces an ancillary, synergistic service that directly supports the day-to-day operations and staff welfare of surrounding industrial occupiers, fostering a self-sustaining business community within the estate. This will be order only.
- 7.4 In light of the above it is considered that the principle of providing the proposed use at the application site is acceptable.

Hot food takeaway SPD

- 7.5 While standard walk-in takeaways fall heavily under the restrictions of the Kirklees Hot Food Takeaway SPD (2022), a delivery-only ghost kitchen operation inherently circumvents the environmental and social challenges the SPD seeks to control.
- 7.6 The Kirklees HFT SPD emphasises the council's commitment to the Kirklees Healthy Weight Declaration, seeking to control the proliferation of fast-food options that exacerbate localised health challenges such as obesity and cardiovascular disease. The council utilises a Public Health Toolkit to score take-away postcodes.

7.7 The applicant explicitly acknowledges these public health objectives and provides the following structural justifications to prove the business will have a neutral or positive impact on community health:

- **Exclusion of the Walk-in Public:** Standard takeaways often drive impulsive, convenient, and unhealthy food choices by school children or passing pedestrians due to high-visibility frontages and visual advertising. Because this is a delivery-only ghost kitchen with zero public access, it generates no pedestrian footfall, does not capture impulse school-age buyers, and is entirely disconnected from the active street scene.
- **Nutritional Diversification:** The business is committed to incorporating healthier food preparation methods into its traditional menu (e.g., reducing sodium/oil content, offering grilled alternatives, and sourcing fresh local ingredients), ensuring that the digital delivery options provided to the wider Dewsbury community include conscious, balanced choices.
- **Worker & Local Estate Nutrition:** By acting as a designated food provider to surrounding industrial workers, the business provides local employees with a high-quality, balanced, alternative meal choice during their shifts. This expands access to real food options in an industrial area where local lunch alternatives are structurally limited, satisfying the core spirit of NPPF Paragraph 96.

Primary employment Area Allocation Compliance

7.8 The application site is strictly allocated within a designated Primary Employment Area under the Kirklees Local Plan (2019). The primary planning objective for this land a location—as governed by Policy LP 08—is to retain, safeguard, and maximise employment land and premises for business uses that actively generate local employment and drive economic productivity.

7.9 When evaluating the baseline position of the unit, its lawful historical use falls under Class B8 (Storage). As a storage facility, the building operated as a passive, low-intensity economic asset. Traditional small-scale B8 storage units typically function as overflow

space for stock, fixtures, or materials. Consequently, they require negligible on-site physical presence and frequently yield zero permanent full-time jobs directly assigned to the specific building floorplate. Left in its previous state, the building represented an under-performing space that contributed nothing to the active working employment numbers of the Ravensthorpe industrial area.

7.10 The proposed change of use to a commercial dark kitchen / ghost kitchen (Sui Generis) represents a substantial, material uplift in employment density and economic output for the site, directly fulfilling the core aims of Policy LP 08 and Policy LP 07 (Efficient Use of Land and Buildings) through the following factors:

- **Direct Local Job Creation:** The business will transition this vacant structure into an active commercial hub, creating 3 new full-time positions for local staff members. These are permanent, secure roles based entirely on-site.
- **Secondary Logistics Employment:** Beyond the core kitchen staff, the hybrid delivery model (utilising both the business's own drivers and third-party networks) creates steady, ongoing flexible economic opportunities for logistics and delivery couriers who will serve the unit daily.
- **Supporting the Industrial Estate Economy:** By acting as a direct food provider to neighbouring commercial operations, the kitchen contributes to the retention and growth of the wider estate. Providing high-quality, healthy food options locally enhances the attractiveness of Netherfield Mill to existing and future employment tenants, multiplying the economic efficiency of Kirklees' designated employment land bank.

7.11 National planning policy strongly mirrors this position. The National Planning Policy Framework (NPPF) states that planning decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight must be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

- 7.12 By approving this change of use, Kirklees Council will actively support the conversion of a low-value, zero-employment storage space into a thriving commercial kitchen that immediately brings jobs into the area. The proposal does not compromise the industrial integrity of the Primary Employment Area; rather, it introduces a modern, high-density employment use that perfectly satisfies both national and local planning goals.

Impact on Amenity

- 7.13 This section provides rigorous policy and technical justification demonstrating that the proposed commercial dark kitchen will have zero adverse impact on the residential amenity of the district, fully complying with Policies LP 24, LP 51, and LP 52 of the Kirklees Local Plan and Paragraph 130 of the National Planning Policy Framework (NPPF).
- 7.14 The overriding justification for the protection of amenity is the site's unique physical location. Unit 4a is nested deeply within Netherfield Mill, an established, high-intensity Primary Employment Area explicitly designed to handle commercial operations.
- 7.15 The nearest residential receptors are located approximately 40 metres away to the north along Netherfield Road. In planning terms, this constitutes a substantial separation distance for an urban settlement boundary. Crucially, this 40-metre gap is structurally and environmentally buffered by intermediate commercial structures.
- 7.16 To explicitly satisfy Policy LP 52 and the environmental principles of the HFT SPD, flue specifications have been provided separately. The operation completely avoids the noise profile of a high street takeaway because no members of the public can visit the site. There will be no customer vehicle engine noise, door slams, shouting, or late-night foot traffic.
- 7.17 Mechanical noise from the kitchen's ventilation system will be strictly controlled at the source using commercial-grade acoustic engineering:
- Silencers & Attenuators: The vertical duct run will feature inline sound attenuators directly behind the fan mechanism to dampen aerodynamic noise.

- **Anti-Vibration Mounts:** The entire flue structure will be secured to the side masonry elevation using rubber-insulated anti-vibration brackets, entirely preventing structural noise transmission through the building fabric.
- **Acoustic Background Thresholds:** Because the unit sits adjacent to active commercial uses and close to the busy transport corridors of Ravensthorpe, the localised ambient background decibel level is already characteristically industrial. The calculated sound pressure level at the nearest residential window facade will fall significantly below local environmental health criteria.

7.18 In accordance with Policy LP 51 and the environmental goals of the Takeaway SPD, the ventilation system has been meticulously designed to prevent cooking odours from tracking towards residential properties.

7.19 The architectural solution utilises a high-velocity vertical extraction duct routed flush along the side elevation of the building, terminating exactly 1 metre above the eaves line. This height extension ensures clearance of localised building wake and high-velocity atmospheric dilution. Combined with primary internal grease separators and carbon block filters to capture volatile organic compounds (VOCs) and cooking particulates before air enters the duct, any residual odours will be completely neutralised long before reaching the 40-metre residential boundary line.

7.20 Finally, the business will close at 10:00 PM Monday to Thursday and 11:00 PM Friday to Sunday. By ceasing all operations before sensitive late-night sleeping hours, the business guarantees that the surrounding neighbourhood will continue to enjoy standard environmental quiet when ambient commercial noise naturally subsides. The operation represents a highly controlled, fully enclosed commercial use that poses absolutely no risk of environmental nuisance to the residents of Dewsbury.

Highways safety

7.21 Policy LP 21 and the HFT SPD require that new developments achieve safe and suitable access without adding materially to highway safety problems. The application site is

uniquely positioned along an unadopted private road within Netherfield Mill. Because this road is a privately maintained infrastructure corridor serving industrial traffic, the small-scale courier movements associated with the dark kitchen will not disrupt public thoroughfares.

- 7.22 The proposal complies fully with the requirements of Policy LP 22 through the provision of at least 4 to 5 dedicated parking spaces located directly outside this unit, explicitly allocated for delivery drivers and staff vehicles. The private yard area features a wide internal turning radius, ensuring that both the business's own drivers and incoming third-party couriers (such as Deliveroo) can turn completely on-site and enter or exit onto the unadopted approach road in a safe forward gear.



Above: The above photos show the availability of car parking spaces adjacent to the proposed unit for delivery drivers to use. The road is quieter during evenings.

- 7.23 Crucially, a temporary surge in order demand typically occurs during peak evening periods, particularly after 6:00 PM. In an industrial mill context, this evening peak aligns perfectly with a significant drop in wider estate activity. By 6:00 PM, the vast majority of

surrounding day-to-day industrial premises have closed their operations and vacated their respective parking areas. As a result, extensive surplus parking space naturally becomes available within the immediate private estate network. This provides an exceptional operational safety buffer, guaranteeing that there is more than adequate capacity to absorb any overlapping courier arrivals during peak operational hours without causing any vehicle pressure or congestion.

7.24 The hybrid delivery operational model remains entirely self-contained:

- **On-Site Staff Drivers:** The 4 to 5 dedicated spaces outside the unit mean the business's own drivers remain permanently off the private access lane when waiting for orders.
- **Third-Party Couriers:** The retrospective front decking acts as a specialised rapid-dispatch platform. It allows instantaneous handover of orders, keeping courier dwell times minimal and completely self-contained within the private courtyard boundary.

7.25 Proximity to the immediate customer base further reduces highway impacts. Because the business will provide food directly to the adjacent commercial operators within the estate, a portion of daytime orders will be fulfilled locally on foot or over very short internal distances. This reduces the reliance on external vehicle trips during the day. Because operational hours are structured from 08:00 AM to 10:00 PM (Mon-Thu) and 08:00 AM to 11:00 PM (Fri-Sun), traffic movements avoid conflict with peak early morning commuter gridlocks. As noted under NPPF Paragraph 115, the residual highway impact is negligible and falls far below the threshold of 'severe' required for refusal.

8.0 CONCLUSION

- 8.1 The application effectively demonstrates complete alignment with the Kirklees Local Plan, the National Planning Policy Framework, and the adopted Hot Food Takeaway SPD. The dark kitchen / ghost kitchen project safely reactivates a disused building at Netherfield Mill, fulfils the objective of the Primary Employment Area by delivering 3 new full-time local jobs, expands healthy eating access within the local industrial estate, provides a highly managed logistics solution utilising 4 to 5 dedicated parking bays, and utilises robust acoustic and filtration engineering to fully protect the local environment.
- 8.2 In accordance with national decision-making policies and the presumption in favour of sustainable development within settlement boundaries, it is respectfully requested that Kirklees Council grant full planning permission.