Brunel House
2 Fitzalan Road
Cardiff
CF24 0EB

26th October 2026
Our Reference: CSC1159

Kirklees Metropolitan Council
Planning Services
Huddersfield
HD1 9EL

Planning Portal Reference: PP-15324393

Dear Sir/Madam,

**APPLICATION ON BEHALF OF MOTOR FUEL GROUP**
**MORRISONS PETROL FILLING STATION, STATION ROAD, MELTHAM, HD9 5NX**

On behalf of our client, Motor Fuel Group (MFG), please find enclosed a planning application in respect of the Morrisons Petrol Station at Station Road. The application seeks consent for the following development:

> *Removal of existing air/vac bays and extension to the existing petrol filling station's sales building, new air/vac bays, locker hub and associated forecourt works.*

## Supporting Information

This application specifically seeks consent to allow for the erection of an extended sales building to be occupied by Greggs. It is anticipated that the retail extension will cater predominantly for motorists who wish to purchase food 'on-the-go' but it will also include an indoor seating area giving customers the opportunity to consume their purchased goods on the premises.

The schedule of areas (sqm) of the sales building are shown in the table below.

| | Existing | Proposed Extension | Total |
|---|---|---|---|
| **Gross External Area** | 72 sqm | 90 sqm | 162 sqm |
| **Gross Internal Area** | 62 sqm | 80 sqm | 142 sqm |

## Rational for the Proposal

MFG is the UK's largest independent forecourt operator with over 900 sites offering a dual-fuel strategy, convenient retail and 'food to go'. As part of MFG's proposals to improve facilities across their portfolio of Morrison petrol filling stations they are also taking the opportunity to extend the existing kiosk/shop, to provide an improved offer i.e. food to go services to visiting motorists.

## Key Considerations

The NPPF (2026) indicates at Policy TR4 that new development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

In terms of retail planning policies, the sequential and impact tests do not apply as the small kiosk offer is purely ancillary to the main use as a petrol filling station, which is not a 'main town centre use' (as defined in the National Planning Policy Framework) – petrol filling stations do not fall within the Class E(a) shop use, being listed in the Use Classes Order 1987 (as amended) as a sui generis use. There should therefore be no mandatory requirement to assess the impact of the larger kiosk. In respect of the sequential test, again the land use is sui generis not a shop use, but in any event given any extension of the kiosk is intended to provide an improved offer to customers using the petrol filling station, it is site specific and clearly could not be located on a separate site. Adopted Kirklees Local Plan identifies at Policy LP13 that the sequential approach will not be required for proposals of 150 square metres and under.

Notwithstanding the above, if an impact assessment was required by policy, then the Government's Planning Practice Guidance (PPG) is clear that impacts should be assessed on a like for like basis in respect of the particular retail sector (PPG ref. 2b-015-20190722), which here would mean the impact of the larger forecourt kiosk on the turnover of other petrol filling stations. However, retail policies in both the National Planning Policy Framework and development plan are concerned with protecting the vitality and viability of defined town centres, so given the kiosk is purely ancillary to the petrol filling station use and caters to passing motorists and is not a retail destination in its own right, a retail impact assessment is clearly not warranted. The PPG also says that impact tests should be undertaken in a proportionate and locally appropriate way (PPG ref. 2b-017-20190722), so again, given the kiosk extension involves only a modest extension to a small retail offer intended to serve customers of the PFS, an impact assessment is not necessary. Any small uplift in turnover the extension will bring will not be spending that would otherwise be spent in the town centre.

The proposed development would be located within an existing petrol filling station and it forms part of a wider Morrisons Supermarket development in Meltham. The proposed area will be well-lit and does not raise any concerns from anti-social behaviour / natural surveillance perspective.

The site is located off The Cobbles that links on to Station Street and Holmfirth Road, which is a B classified road subject to a 30-mph speed limit. No changes are proposed to the existing site access. It is not expected that the proposed development will cause any increase in traffic on the surrounding highway network, due to the ancillary nature of the retail offering and expected use of the site by the passing motorist. Proposed car parking spaces associated with the sales kiosk are expected to be sufficient to meet the needs of the proposed development.

## Submission Documents

The following documents are submitted in support of this application:

- Completed Application Form
- Planning Supporting Letter (this document)
- FRA 4342-RE-10-26-01
- Climate Change Statement
- Application drawings comprising:
    - 260708 - PLNG1A - Existing Layout
    - 260708 - PLNG2A - Site Location Plan
    - 260708 - PLNG3 - Existing Site Elevations
    - 260708 - PLNG4A - Proposed Site Layout
    - 260708 - PLNG5 - Proposed Site Elevations
    - 260708 - PLNG6 - Proposed Building Details

- 260708 - PLNG7 - Proposed Building Elevations
- 260708 - PLNG8 - Proposed Drainage Layout

We trust that the application is in order and that it can be processed accordingly. Should you have any queries or wish to discuss the above please don't hesitate to contact us.

Yours faithfully,

**Lucy Pillivant**
**Senior Planner**
**CarneySweeney**
Encl.