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PARKING FOR TRAILERS
AT WEST VIEW FARM
RED COW DROVE
MOULTON MARSH
SPALDING
LINCS
PE12 6LW

FOR

BROOKS (SPALDING) LTD



JUSTIFICATION STATEMENT

This re-application is to acquire Town and Country Planning Permission for the parking of trailers for the benefit of Brooks (Spalding) Ltd following refusal of application H13-0193-26.

A Google Image is enclosed to this report showing an area of land that has been used for the last 10 years to park trailers for the use of Brooks (Spalding) Ltd. This business can confirm they have been operating for the last 10 years on this site and have gradually increased the area ever since.

A justification statement follows this heading sheet.

The Planning, Design & Access Statement, FRA, BNG reports and drawing 02E is to be read in conjunction with the statement to support the planning application.

G R Merchant Ltd
August 2026

Introduction

This application is submitted in response to the refusal of H13-0193-26 and sets out the justification for the proposed development and the reasons why continued operation at the existing site is essential for the viability, sustainability, and future growth of the business. Over the past decade, the company has operated successfully from its current location, forming an efficient working relationship with a neighbouring servicing business and contributing positively to the local economy.

The report also provides detailed evidence of the extensive efforts made to identify alternative sites within the district. These efforts demonstrate clearly that no suitable, affordable, or available land exists within designated employment areas or elsewhere. As a result, remaining at the current site is not only the most practical and sustainable option but also the only viable one.

The following sections outline the reasons why the proposal aligns with the South East Lincolnshire Local Plan, satisfies the criteria of Policy 7, and supports wider economic, environmental, and community objectives.

Identifying alternative sites

Area

In determining the most appropriate area for potential relocation, Brooks (Spalding) Ltd has undertaken a careful assessment of operational requirements, environmental responsibilities, and local community impacts. The following factors form the basis of the site-selection rationale and demonstrate why the identified area is the only viable option for further investigation.

1. **Operational Interdependence with Existing Servicing Partner**

   Brooks (Spalding) Ltd operates in a long-standing, symbiotic arrangement with a servicing company located at the current address. All trailers undergo scheduled servicing approximately every seven weeks, with no additional vehicle movements required. Relocating outside the immediate vicinity would introduce significant operational inefficiencies and create avoidable environmental impacts through increased trailer transport. To maintain this essential relationship, any new site must be located close enough to preserve current servicing arrangements. Alternatively, a site of sufficient scale to accommodate both businesses would be required—an option that further narrows the pool of suitable locations.

2. **Protecting employee accessibility and sustainability**

   The business must remain easily accessible for current employees, ensuring their commute does not significantly increase. A longer commute would not only risk employee retention but would also contribute to higher car usage and unnecessary environmental impact. Maintaining proximity to the existing workforce is essential for both operational stability and environmental responsibility.

3. **Remaining close to the core client base**

The majority of clients (50%) are located in the Spalding area, with an additional 15% in Skegness, 5% in Wisbech, and 30% in the wider Holbeach area including Holbeach St Marks. Staying within close reach of these key locations is crucial for maintaining service efficiency, responsiveness, and customer satisfaction. Any relocation must therefore support continued convenience for the clients who form the backbone of the business, alongside the A17 gateway.

The area identified is as follows.



Suitability

To ensure that any relocation supports the continued lawful, safe, and sustainable operation of Brooks (Spalding) Ltd, the suitability of potential sites has been assessed against a set of essential operational criteria. These requirements are not optional preferences but fundamental conditions necessary for the business to function effectively and without creating adverse impacts on the surrounding area.

1. **Adequate Parking and Safe Trailer Manoeuvring Space**

   The business requires parking capacity for a minimum of 20 trailers, with sufficient circulation space to allow safe and flexible movement. This is critical to avoid congestion, prevent overspill onto public highways, and ensure compliance with health and safety obligations. A site lacking this capacity would result in operational inefficiencies and increased risk to both staff and the wider public realm.

2. **Appropriate Scale of Storage Facilities**

   Only a modest amount of storage is required for parts. Large warehouses or substantial buildings would be inappropriate, under-utilised, and contrary to efficient land use principles.

A site must therefore offer small-scale storage provision without imposing unnecessary or disproportionate built form that would remain largely vacant and fail to meet the functional needs of the business.

3. **Commercial Classification and Availability**

   The site must be commercially designated, available for purchase, to ensure lawful occupation and alignment with local planning policy. Industrial or commercial land is essential to avoid conflict with residential amenity, minimise environmental impact, and maintain compatibility with surrounding land uses. We do not consider renting to be a sustainable or secure option for our business. A leased site carries the ongoing risk of being served notice to vacate at any time, which would place the business in an extremely vulnerable position. As demonstrated below, suitable alternative sites are limited and not easily sourced at short notice. The loss of a rented premises without a viable replacement would therefore pose a serious threat to the continuity of the business and could ultimately lead to its collapse.

4. **Financial Viability and Reasonable Cost Threshold**

   Due to financial constraints arising from a recent demerger and the need to recruit additional staff following the loss of a business partner, the maximum purchase price for any site cannot exceed £500,000. This figure represents approximately one-third of the total value of the business and reflects a realistic and proportionate investment level. A site exceeding this threshold would be financially unviable and would jeopardise the stability of the business, its workforce, and its ability to continue serving the local area.

Sites Identified

A structured search for suitable commercial sites was undertaken and completed on 21 June 2026. The search focused exclusively on the area previously identified as operationally and environmentally appropriate for relocation. Rightmove was used as the primary research platform, reflecting its position as the UK's busiest and most comprehensive commercial property listing service (Rightmove Data, January 2016). This ensures that the search was both robust and representative of the actual market availability at the time.

Initial Market Availability

Within the defined search area, a total of 71 commercial properties were listed for sale. This demonstrates a healthy level of market activity and confirms that the search area was sufficiently broad to allow meaningful assessment.

Refining the Search to Relevant Use Classes

To ensure alignment with the operational needs of Brooks (Spalding) Ltd, the search was refined to include only property types capable of supporting the lawful and practical requirements of the business. The following categories were selected due to their potential compatibility with trailer storage.

- **Industrial**
  - Heavy Industrial
  - Industrial Park
  - Light Industrial

    - Storage
    - Warehouse
- **Land / Development**
    - Land
    - Commercial Development
    - Industrial Development
- **Other**
    - Mixed Use
    - Other

This refinement ensured that only properties with realistic potential for lawful occupation and operational suitability were considered. After applying these filters, the number of viable properties reduced to **46.**

Financial Viability Filter

Given the financial constraints arising from the recent demerger and the need to recruit additional staff, a maximum purchase price of **£500,000** was applied. This threshold represents a reasonable and proportionate investment level, approximately one-third of the total business value, and is essential to ensuring long-term financial sustainability.

Applying this viability filter reduced the number of suitable properties to **38.**

Name	Web Link	Suitability
Food Enterprise Zone, Cibus Way, Holbeach, Lincolnshire, PE12	https://www.rightmove.co.uk/properties/138607739#/?channel=COM_BUY	The existing buildings on this development are high-specification, modern units designed for advanced commercial and technological operations. Their scale, finish, and intended use are fundamentally incompatible with the functional requirements of a trailer yard. Introducing a trailer-based operation into this environment would create a stark visual and operational contrast, resulting in a poor fit with the established character of the development. The wider site is clearly positioned as an 'agri-tech' hub, with businesses aligned to innovation, research, and high-value agricultural technology. Brooks (Spalding) Ltd does not operate within this sector, and its activities do not align with the strategic purpose or branding of the development. As such, locating a trailer yard here would conflict with the intended economic direction of the site and undermine the coherence of the agri-tech cluster. Furthermore, outline planning permission for this development does not include the type of industrial, storage, or trailer-related usage required by the business. The absence of appropriate planning consent means the site cannot lawfully accommodate the proposed operations without significant deviation from the approved scheme—something that is neither supported by policy nor compatible with the development's established land-use framework.

Retail, Long Sutton, Lincolnshire	https://www.rightmove.co.uk/properties/155799470#/?channel=COM_BUY	This property is a small retail unit located in the centre of Long Sutton and is wholly unsuitable for the operational needs of a trailer-based business. The site provides no parking provision whatsoever, and the surrounding road layout offers no safe or practical access for lorries or trailer movements. Its town-centre location, combined with restricted space and incompatible infrastructure, makes it entirely unfit for the required use.
Lincs Gateway, Goodison Road, Spalding, Lincolnshire, PE12 6FY	https://www.rightmove.co.uk/properties/754740731008033#/?channel=COM_BUY	The existing buildings within this development are high-quality, modern commercial units, including fast-food outlets and a hotel, designed for customer-facing, high-amenity uses. This character is fundamentally incompatible with the operational nature of a trailer yard. Introducing trailer storage and associated vehicle movements into such an environment would create a stark visual and functional conflict with the established development. From an aesthetic and design-quality perspective, a trailer yard would not integrate with the surrounding built form. The development has been constructed to a high architectural standard, and the presence of trailers, open storage, and associated industrial activity would undermine the visual coherence and intended commercial character of the site. Although the site technically permits B8 use, this is explicitly caveated as being suitable for *warehousing* only. The operational requirements of a trailer yard, open storage, regular HGV movements, and large manoeuvring areas, fall outside the scope of what is envisaged under this restricted B8 classification. As such, the permitted use does not align with the business's needs. The indicative plan contained in Appendix 10 of the South East Lincolnshire Local Plan further demonstrates that the development is intended to accommodate commercial buildings rather than haulage-related operations. The layout shows limited open space and a clear preference for built commercial units, leaving no practical provision for trailer storage or HGV circulation. Only two plots remain available, with the largest measuring approximately 1.0 acre, significantly smaller than the site the business currently occupies. This reduced footprint would not provide sufficient space for trailer parking, safe manoeuvring, or future operational growth, making the site physically incapable of accommodating the required use.
Washway Road, Holbeach, PE12 8LT	https://www.rightmove.co.uk/properties/8942	The parking provision on this site is significantly undersized and does not meet the operational requirements of the business. The available space is smaller than the area we currently operate from, meaning it cannot accommodate our existing

	3730#/?channel=COM_BUY	trailer capacity, let alone support any future growth. As a result, the site is fundamentally unsuitable and would restrict the business's ability to function safely, efficiently, and sustainably over the long term.
Pinchbeck Road, PE11 1QF	https://www.rightmove.co.uk/properties/165991742#/?channel=COM_BUY	The site is located within a well-established residential area in Spalding, making it fundamentally inappropriate for a trailer-based operation. The nature of the surrounding land use (predominantly housing) conflicts directly with the industrial activity, vehicle movements, and operational requirements of our business. Locating a trailer yard here would be incompatible with the character of the area and would not represent a suitable or sustainable use of the land.
Former Wesleyan Methodist ChurchHigh Road, Whaplode, PE12 6TG	https://www.rightmove.co.uk/properties/162517466#/?channel=COM_BUY	This property provides only a single parking space, which is wholly inadequate for the operational needs of the business. As such, it cannot accommodate even the most basic requirements of trailer storage or vehicle movements and is therefore entirely unsuitable.
Stirlin Innovation Park, Food Enterprise Zone, Holbeach, PE12 7FH	https://www.rightmove.co.uk/properties/154387580#/?channel=COM_BUY	These are newly constructed commercial units with very limited parking provision, far below what is required for a trailer yard. The available space cannot accommodate trailer storage or manoeuvring, making the site entirely unsuitable for the operational needs of the business.
18 Station Street/1 Chapel Lane Spalding, PE11 1EF	https://www.rightmove.co.uk/properties/166016732#/?channel=COM_BUY	This property is a small retail unit located in the centre of Spalding and is entirely unsuitable for our operational needs. It offers no parking provision, and the surrounding road network does not allow safe or practical access for lorries or trailer movements. Its town-centre setting, combined with restricted space and incompatible infrastructure, makes it wholly unfit for use as a trailer-based business.
15/16 Station Street, Spalding, PE11 1EF	https://www.rightmove.co.uk/properties/148021430#/?channel=COM_BUY	This property is a small retail unit located in the centre of Spalding and is entirely unsuitable for our operational needs. It offers no parking provision, and the surrounding road network does not allow safe or practical access for lorries or trailer movements. Its town-centre setting, combined with restricted space and incompatible infrastructure, makes it wholly unfit for use as a trailer-based business.
Green Lane, Holbeach, PE12 7BZ		This property is located very close to the centre of Holbeach, where surrounding roads and infrastructure are not designed to accommodate lorry or trailer movements. The site itself is smaller than the area we currently operate from, meaning it cannot meet our existing operational requirements and offers

		no capacity for future growth. For these reasons, the location is wholly unsuitable for a trailer-based business.
Arable Land For Sale by Informal Tender	https://www.rightmove.co.uk/properties/88632057#/?channel=COM_BUY	Arable land not suitable for commercial development.
Plot At The Old Black Horse, Holbeach clough. PE12 8DJ	https://www.rightmove.co.uk/properties/165660557#/?channel=COM_BUY	The site is located within an established residential area, making it wholly inappropriate for use as a trailer yard. The industrial activity, vehicle movements, and operational requirements of the business would conflict directly with the surrounding residential character, resulting in an incompatible and unsustainable land use.
South Lincolnshire Food Enterprise Zone, Cibus Way, Holbeach	https://www.rightmove.co.uk/properties/746606043942849#/?channel=COM_BUY	This listing is a duplicate of the Food Enterprise Zone site at Cibus Way, Holbeach, Lincolnshire, PE12, which has already been assessed and found unsuitable.
Food Enterprise Zone, Cibus Way, Holbeach, Lincolnshire, PE12	https://www.rightmove.co.uk/properties/138607739#/?channel=COM_BUY	This listing is a duplicate of the Food Enterprise Zone site at Cibus Way, Holbeach, Lincolnshire, PE12, which has already been assessed and found unsuitable.
Surplus Land Off Love Lane Spalding PE11 2PG	https://www.rightmove.co.uk/properties/89627316#/?channel=COM_BUY	The parcel of land is smaller than the area we currently operate from and cannot accommodate our existing trailer capacity or operational requirements. In addition, it is situated within a densely populated residential area of Spalding, where the industrial activity and vehicle movements associated with a trailer yard would be wholly incompatible with the surrounding land use. For these reasons, the site is not suitable for our business.
Wardentree Lane, Pinchbeck, PE11 3UF	https://www.rightmove.co.uk/properties/159096047#/?channel=COM_BUY	Although the Local Plan sets a general presumption in favour of commercial development, including haulage-related uses, the selling agent, Longstaffs, has confirmed that they are not willing to release this land for a business of our type. As a result, the site is not genuinely available for consideration. Their written confirmation has been included within this report as evidence.
Winsover Road, Spalding	https://www.rightmove.co.uk/properties/166360559#/?channel=COM_BUY	This property is a small retail unit located close to the centre of Spalding and is entirely unsuitable for our operational needs. It provides no parking provision, and the surrounding road layout cannot safely or practically accommodate lorry or trailer movements. Its town-centre setting and restricted access make it wholly unfit for use as a trailer-based business.

Land with Full PP for 2 dwellings, Adj. 51 The Poplars, PE11 2RJ	https://www.rightmove.co.uk/properties/124013117#/?channel=COM_BUY	This land is situated within a residential area, making it wholly inappropriate for commercial use as a trailer yard. The industrial activity, vehicle movements, and operational requirements associated with such a use would conflict directly with the surrounding residential character, rendering the site unsuitable. Full planning permission is for residential, and not commercial, demonstrating the intended nature of this site.
Holbeach	https://www.rightmove.co.uk/properties/89117298#/?channel=COM_BUY	This property is located in the centre of Holbeach and has no parking provision, making it entirely unsuitable for our operational requirements.
Holbeach	https://www.rightmove.co.uk/properties/88894053#/?channel=COM_BUY	This property is located in the centre of Holbeach and has no parking provision, making it entirely unsuitable for our operational requirements.
Pennygate, Spalding, Lincolnshire, PE11	https://www.rightmove.co.uk/properties/86798037#/?channel=COM_BUY	The parcel of land is smaller than the area we currently operate from and cannot accommodate our existing trailer capacity or operational needs. Furthermore, it is located within a densely populated residential area of Spalding, where the industrial activity and vehicle movements associated with a trailer yard would be wholly incompatible with the surrounding land use. For these reasons, the site is unsuitable for our business.
Holbeach, PE12 7DE	https://www.rightmove.co.uk/properties/157645220#/?channel=COM_BUY	The parcel of land is located within a densely populated residential area of Holbeach, making it wholly unsuitable for use as a trailer yard. The vehicle movements and operational activity associated with such a use would be incompatible with the surrounding residential environment.
Spring Gardens PE12 9HU	https://www.rightmove.co.uk/properties/173110553#/?channel=COM_BUY	The parcel of land is located within a densely populated residential area of Spalding, making it wholly unsuitable for use as a trailer yard. The vehicle movements and operational activity associated with such a use would be incompatible with the surrounding residential environment.
Plot 3, Thary Lane, Surfleet, Spalding	https://www.rightmove.co.uk/properties/132560354#/?channel=COM_BUY	This plot forms part of a designated self-build residential development and benefits from planning permission for residential use, making it unsuitable for any form of commercial activity. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space requirements of a trailer yard. For these reasons, the site is not a viable option for our business.
Plot 5, Thary Lane, Surfleet, Spalding	https://www.rightmove.co.uk/properties/1345	This plot forms part of a designated self-build residential development and benefits from planning permission for residential use, making it unsuitable for any form of commercial activity.

	56842#/?channel=COM_BUY	In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space requirements of a trailer yard. For these reasons, the site is not a viable option for our business.
Stockwell Gate North, Whaplode, Spalding	https://www.rightmove.co.uk/properties/167226635#/?channel=COM_BUY	The site has outline planning permission for residential development and is situated within an established residential area, making it unsuitable for any commercial use. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space or operational requirements of a trailer yard. For these reasons, the site is not a viable option for our business.
Plot 6, Thary Lane, Surfleet, Spalding	https://www.rightmove.co.uk/properties/132583304#/?channel=COM_BUY	This plot forms part of a designated self-build residential development and benefits from planning permission for residential use, making it unsuitable for any form of commercial activity. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space requirements of a trailer yard. For these reasons, the site is not a viable option for our business.
Surfleet Road, Pinchbeck, Spalding	https://www.rightmove.co.uk/properties/133408307#/?channel=COM_BUY	The site has outline planning permission for residential development and is situated within an established residential area, making it unsuitable for any commercial use. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space or operational requirements of a trailer yard. For these reasons, the site is not a viable option for our business.
Surfleet Road, Pinchbeck, Spalding	https://www.rightmove.co.uk/properties/133408304#/?channel=COM_BUY	The site has outline planning permission for residential development and is situated within an established residential area, making it unsuitable for any commercial use. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space or operational requirements of a trailer yard. For these reasons, the site is not a viable option for our business.
Surfleet Road, Pinchbeck, Spalding	https://www.rightmove.co.uk/properties/133408367#/?channel=COM_BUY	The site has outline planning permission for residential development and is situated within an established residential area, making it unsuitable for any commercial use. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space or operational requirements of a trailer yard. For these reasons, the site is not a viable option for our business.
Lime Walk, Long Sutton, Spalding	https://www.rightmove.co.uk/properties/1686	This land is positioned adjacent to residential properties and is marketed for self-build or investment purposes, making it unsuitable for commercial use. The parcel is also smaller than the area we currently operate from and cannot accommodate

	88478#/?channel=COM_BUY	the space or vehicle movements required for a trailer yard. For these reasons, the site is not a viable option for our business.
Surfleet Road, Pinchbeck, Spalding	https://www.rightmove.co.uk/properties/133408340#/?channel=COM_BUY	The site has outline planning permission for residential properties and is located within an established residential area, making it unsuitable for any commercial use. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space or vehicle movements required for a trailer yard. For these reasons, the site is not a viable option for our business.
Plot 4 Fleet Road, Fleet, Holbeach, Spalding, Lincolnshire, PE12	https://www.rightmove.co.uk/properties/87928623#/?channel=COM_BUY	The site has outline planning permission for residential properties and is located within a residential area of Holbeach. It is also classed as a residential building plot, meaning it is not available for commercial use. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space or vehicle movements required for a trailer yard. For these reasons, the site is not a viable option for our business.
Plot 3 Fleet Road, Fleet, Holbeach, Spalding, Lincolnshire, PE12	https://www.rightmove.co.uk/properties/87928554#/?channel=COM_BUY	The site has outline planning permission for residential properties and is located within a residential area of Holbeach. It is also classed as a residential building plot, meaning it is not available for commercial use. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space or vehicle movements required for a trailer yard. For these reasons, the site is not a viable option for our business.
Plot 2 Fleet Road, Fleet, Holbeach, Spalding, Lincolnshire, PE12	https://www.rightmove.co.uk/properties/87928482#/?channel=COM_BUY	The site has outline planning permission for residential properties and is located within a residential area of Holbeach. It is also classed as a residential building plot, meaning it is not available for commercial use. In addition, the parcel of land is smaller than the area we currently operate from and cannot accommodate the space or vehicle movements required for a trailer yard. For these reasons, the site is not a viable option for our business.
Residential Development Site PE12 7BZ	https://www.rightmove.co.uk/properties/108495920#/?channel=COM_BUY	The parcel of land is located within a densely populated residential area of Holbeach, making it wholly unsuitable for use as a trailer yard. The vehicle movements and operational activity associated with such a use would be incompatible with the surrounding residential environment.
Roman Bank, Holbeach Clough, PE12 8DJ	https://www.rightmove.co.uk/properties/165683159#/?channel=COM_BUY	The parcel of land is located within an established residential area of Holbeach, making it unsuitable for use as a trailer yard. It is also smaller than our current operational site and cannot accommodate the space or vehicle movements required for our business.

Spalding Road, Pinchbeck, Spalding	https://www.rightmove.co.uk/properties/158298926#/?channel=COM_BUY	The site has outline planning permission for residential properties and is situated within an established residential area, making it unsuitable for commercial use. In addition, the parcel of land is smaller than our current operational site and cannot accommodate the space or vehicle movements required for a trailer yard.
High Street, Holbeach	https://www.rightmove.co.uk/properties/167189090#/?channel=COM_BUY	This property is a retail unit located on Holbeach High Street and is therefore unsuitable for our operational needs. It has no parking provision, and the surrounding road layout does not allow safe or practical access for lorries.

Further Enquiries

In addition, we contacted commercial estate agents operating locally, as well as business owners known to hold land, to identify any potential future sites not listed on Rightmove. The responses received are attached and demonstrate the ongoing lack of available land suitable for haulage operations in the area. This confirms that the issue is not new but a persistent one.

Responses:

- Pygott & Crone (Lincoln Commercial Branch): No response received
- R Longstaff & Co: Response attached
- Hiltons Transport: Response attached

conversion factors 2025

Reasons to Remain

1. **Relocation would directly conflict with the Local Plan and significantly increase CO_2 emissions**

   Declining this planning application and forcing the business to relocate would run contrary to Priority 12 of the South East Lincolnshire Local Plan, which seeks:

   "To improve South East Lincolnshire's highway infrastructure, to tackle congestion, improve road safety and make journeys as easy as possible particularly for those living in rural areas and to enhance efficiencies for business."

   Relocation would have the opposite effect. Our refrigerated trailers require servicing every seven weeks, and with a fleet of approximately 120 trailers, this would equate to 1,782 additional trailer movements per year between any new site and the location of our servicing partner. Currently, we operate on the same site and therefore these journeys do not occur, helping to keep roads less congested.

Using the 2025 conversion factors - conversion factors 2025, relocating to a site such as Pinchbeck Industrial Estate (10.5 miles away) would generate an additional 18,902 kg CO_2e per year. This represents a substantial and unnecessary increase in emissions, congestion, and operational inefficiency. It would also impose significant additional costs on the business and reduce productivity for employees. Remaining on the current site is therefore the most sustainable, efficient, and policy-aligned option.

2. **Declining permission risks job losses and undermines local economic growth objectives**

   The Local Plan states:

   "The South East Lincolnshire authorities will, in principle, support proposals which assist in the delivery of economic prosperity and some 17,600 jobs in the area."

   Refusing this planning permission would jeopardise the stability and growth of not one, but two local businesses. As a small employer, any forced relocation or operational restriction would have immediate consequences for staffing levels. Our main employee is a veteran who has served his country in several tours of Afghanistan; the potential loss of his role would be particularly regrettable.

   Furthermore, recent business growth for the company in which we have a symbiotic relationship with has been supported by a **Grants for Growth** award from South Holland District Council, used to install a servicing pit to improve operational efficiency. The grant's purpose was to stimulate economic growth which has been successful. Our growth has directly led to the growth of this business. Preventing that growth from continuing would undermine the intended public benefit and risk wasting taxpayers' money.

3. **No alternative sites exist, and Policy 7 supports development where suitable land is unavailable**

   There are currently no affordable or suitable sites available within designated employment areas for a small business such as ours. This is not an isolated issue: many haulage and transport businesses in the district are struggling to expand due to a lack of available land. This has been evidenced through direct enquiries with commercial agents and landowners, as detailed earlier in this report.

   Policy 7 of the Local Plan allows development on non-allocated sites where no suitable buildings or previously-developed land are available, provided certain criteria are met. We agree that the land is not previously-developed and should therefore be assessed against criteria (a–f). However, we dispute the conclusion that these criteria are not satisfied.

   We can demonstrate that:

   - No suitable buildings exist for conversion or reuse.

   - No previously-developed land is available or appropriate.

   - Alternative sites have been actively sought and are not available.

   We also draw attention to a relevant precedent: application H16-0930-18, approved by the planning committee, where a business expanded onto adjacent land for operational efficiency. The decision recognised that such expansion was logical, practical, and economically

beneficial. Our proposal mirrors this rationale and goes further by evidencing the absence of alternative sites.

The Council's own assessment in section 7.5 of that decision is equally applicable here: the site is not strategic in scale, is directly associated with the existing business, and using adjacent land minimises traffic movements, precisely the sustainable outcome Policy 7 seeks to encourage.

"Given that the former historical use of the land was horticultural, it is not considered to be previously-developed land. As such, the proposal should be assessed against parts a-f above. A number of the points (a-d) are covered in more detail in the remainder of the report in the sections on residential amenity, highways and impact upon character and appearance of the area. In terms of those that are not, the following arguments can be made. It is not considered that there would be a significant adverse impact upon the viability of delivering any allocated employment site. The site is not strategic in scale and would be associated with the existing business adjacent. Furthermore, the business has identified a need for further land to support its operations and acquiring the land adjacent is the most logical solution to this. Although the proposal would not directly maximise opportunities for modal shift away from the private car, utilising the land adjacent would mean that a storage location would not have to be sought elsewhere which would minimise traffic movements"

Assessment Against Policy 7 Criteria

Consideration will now be given to the criteria for Policy 7 and why we can satisfy this.

a. No conflict with neighbouring land uses

The Council has already acknowledged that the proposal does not conflict with neighbouring land uses.

b & c. No significant adverse impact on character or appearance; design responsive to local context

The land take is minimal. With hedging, trees, and appropriate fencing (including an open, see-through gate as advised by the conservation officer), the proposal would **enhance** the visual character of the area. Without permission, trailers would continue to be stored on grass, creating a muddy, unsightly field and limiting our ability to grow our company. The potential aesthetical changes have been demonstrated further in this report.

d. No significant adverse impact on the local highway network

The Council has confirmed that the proposal would not significantly affect the highway network.

e. No significant adverse impact on the viability of allocated employment sites

The Council has stated that any conflict would not be significant. The site is small and directly linked to an existing business.

f. Modal shift considerations

The Council acknowledges that vehicle movements are inevitable for this type of business, regardless of location. Using adjacent land minimises unnecessary travel and is therefore the most sustainable option.

g. Identified need for location outside designated employment areas

We have demonstrated that no suitable land exists within designated employment areas and that remaining adjacent to our current site is essential for operational efficiency, carbon reduction, cost control, and staff retention.

Commitment to Improving the Site

We are committed to significantly improving the aesthetic quality of the land for the benefit of neighbouring residents. While a trailer yard has inherent limitations, the proposed enhancements, hardstanding, fencing, hedging, and tree planting will transform the site's appearance. Without planning permission, the site will remain visually poor, with trailers stored on grass and no ability to invest in improvements, with the trailers being very visible due to no fencing.



The site currently



Potential improvements following grant of planning permission

Summary

The report demonstrates that remaining on the existing site is essential for the business's operational efficiency, environmental sustainability, and continued contribution to the local economy. Relocation would directly conflict with Local Plan priorities by significantly increasing trailer movements, congestion, and CO_2 emissions, amounting to an additional 18,902 kg CO_2e per year, while also imposing substantial financial and productivity costs.

Refusal of permission risks job losses, including for a veteran employee, and undermines growth previously supported by public funding. Extensive enquiries confirm that no suitable or affordable alternative sites exist within designated employment areas, and Policy 7 provides clear support for development where such land is unavailable.

The proposal meets all relevant criteria, will improve the appearance of the site through landscaping and appropriate fencing, and represents the most logical, sustainable, and economically beneficial solution for both the business and the district.

We have been operating on this site since 2009, and as such we can continue to operate here regardless of this planning decision, albeit in a smaller capacity. Our goal is to be able to improve the aesthetics of the site and be able to continue the growth of the business, which is contributing to the local economy.


8/2016
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