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Dear Ms Skinner

Re: Appeal of planning application 13/03244/STPLF by Yorkshire Evergreen

I am aware that Yorkshire Evergreen has submitted an appeal following the rejection of the above planning application by East Riding of Yorkshire Council.

The application was rejected by the Planning Committee on the grounds that it would "have an unacceptable impact upon local amenity and the quality of life for local residents"[1]. As the proposal has not been altered, this view remains valid.

A number of objections were raised at the time of the initial consultation at the end of 2013, all of which remain pertinent. The contribution to the local economy resulting from the proposal has been exaggerated by the applicant in their Design, Access, Planning and Heritage Statement[2] which says "The proposal involves investment in an existing Holderness company" and that "the type of business in which B&K is involved has a huge impact on the UK economy". The reality is that just 10 new jobs would be created over three years. In addition, the local facilities, especially the roads surrounding the site, are not of sufficient quality to handle the increase in traffic during the building works which will include 40 foot and 16 tonne lorries and concrete mixers[3].

The plans also contain no provision for the dogs at the site to have access to an outdoor exercise area. This is contrary to EU Directive 2010/63/EU[4] and the Home Office Code of Practice[5] which both state dogs shall "where possible be provided with outdoor runs". While the company said the decision to omit runs is based on giving the dogs protection from "potential infections from wildlife in the area"[6], this would clearly be a risk wherever animals are given outside access, so should not be a reason to deny it to the animals at this facility.

There are also a number of points which relate to the nature of business to be undertaken at the facility. The government has pledged to reduce the use of animals in experiments and the development of non-animal alternatives mean that in the coming years the "'demand"' for dogs from the research industry should decline. In addition, there are a number of species differences between dogs and humans which make the data taken from these animals unreliable when applied to human medicine – a fact that is becoming more widely recognised.

[1] http://www.eastriding.gov.uk/padocs/JAN2013/02FD508F5B6911E399B44437E6597956.pdf
[2] https://fs-filestore-eu.s3.amazonaws.com/eastriding/BKU/Design,%20Access,%20Heritage%20and%20Planning%20Statement.pdf
[3] https://fs-filestore-eu.s3.amazonaws.com/eastriding/BKU/Traffic%20Flow%20Analysis.pdf
[4] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:276:0033:0079:en:PDF
[5] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/148568/aspa-draft-code-of-practice.pdf
[6] http://www.eastriding.gov.uk/padocs/JAN2013/FF1DAD824B7611E39C54BC74E2F60C70.pdf

Finally, the clear view of local people on this application and the previous one has already been expressed, both directly through the thousands who have made submissions, signed petitions, and through their elected representatives. A similar proposal was previously rejected by the Council, Planning Inspectorate and the Secretary of State. The government has made a clear commitment to localism, saying in 2010 that by "*getting out of the way and letting councils and communities run their own affairs we can restore civic pride, democratic accountability*"[7]. Having made that pledge, it would be hypocritical to now overrule the decision made by the local council, for a second time.

For the reasons outlined above, I request that the decision of the council on this application be upheld.

Yours sincerely

[7] https://www.gov.uk/government/news/localism-bill-starts-a-new-era-of-people-power