

KIRKLEES METROPOLITAN COUNCIL INVESTMENT & REGENERATION SERVICE

DEVELOPMENT MANAGEMENT

Town and Country Planning Act 1990 (as amended) – SECTION 70

DELEGATED DECISION TO DETERMINE PLANNING APPLICATIONS

Reference No:	2025/62/91202/E
Site Address:	Unit 800, Bretton Park Industrial Estate, Bretton Park Way, Savile Town, Dewsbury, WF12 9BS
Description:	Erection of three storey office extension, alteration of hard surfaced area to car park, with associated works including landscaping.
Recommending Officer:	Farzana Tabasum

DECISION – Full Planning Permission – Approve

I hereby authorise the approval of this application for the reasons set out in the officer's report and recommendation annexed below in respect of the above matter.

Nick Hirst

AUTHORISED OFFICER

Date: 11/12/2025

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Application: 2025/91202

Site: Unit 800, Bretton Park Industrial Estate, Bretton Park Way, Savile Town, Dewsbury, WF12 9BS

Proposal: Erection of three storey office extension, alteration of hard surfaced area to car park, with associated works including landscaping.

Site Description

The site forms part of the established Bretton Park Industrial Estate. It is occupied by UK Greetings Ltd and comprises warehouse and ancillary offices with surfaced parking and service infrastructure. Staff/visitor parking is predominantly to the south and west of the main building with access via Gate A on the western boundary. The service/delivery yard is to the north with HGV access via Gate B on the northern boundary.

The surrounding context to the north, south and west appears predominantly to be in B2/B8 uses, with open Green Belt land to the east.

Description of Proposal

The proposals are for a three-storey office extension to be sited along the southern elevation of the existing building, reconfiguration of existing car parking areas to the south and west and additional parking will be provided within the existing yard area to the north.

The scale and size, the proposed extension is indicated to be 63m x 15.8m and approximately 12.3m high from ground level to parapet. It would provide circa 2,820sqm of floor space across the three floors. The extension would therefore sit below the existing building's overall ridge height. It is proposed to externally face the extension in coordinated materials, textured and black brick with aluminium glazing/curtain walling and grey metal clad roof.

A landscaping strategy is provided for the site, which aims to enhance the existing soft landscaping on site which will provide some aesthetically pleasing feature landscaping to the focal points of the proposed elevations of the extension.

The extension will accommodate existing staff relocating from a second building, operated by the applicant, on Mill Street East at the junction with Warren Street. The development proposals would result in all 264 staff from

Mill Street East site relocating to the Bretton Park Way site. This will give a maximum of 385 staff at the Bretton Park Way at any time.

The existing staff and visitor car parking is accessed from Gate A and provides 240 no. car parking spaces. A total of 290 parking spaces are proposed: the additional 50 parking spaces proposed are to be provided in a new area of parking accessed via the Gate B access. The parking area proposed to be located to the north, will be protected from the movement of goods vehicles to the delivery bays within this area, through the provision of a pedestrian walkway and crossing, to ensure safe passage of pedestrians to the main building.

Relevant Planning History

Application Site

2001/91704 - Outline application for use class b1 (business) b2 (general industrial) and class b8 (storage and distribution) development – granted 07/02/2002

2004/93514 - Infrastructure works, siteworks and landscaping to industrial estate – granted 12/09/2004

2007/94669 - Erection of warehouse and distribution unit including car parking, loading yard and external works – 06/02/2008

2008/93935 - Discharge of Condition 5, 6, 7, 9 & 11 on previous permission 2007/62/94669/E2 for erection of warehouse & distribution unit including car parking, loading yard & external works – decision 28/11/2008

Surrounding Area

There has also been a number of applications on the surrounding industrial sites, however, none of which are relevant to this site

History of Negotiations

Revised plans were requested which indicated (measurements) the scale of the proposed extension, providing landscape, car parking and waste storage details.

Confirmation from Northern Gas was also sought by the case officer to establish the reasoning for withdrawal of their initial objection.

It was not considered necessary to carry out further publicity as the proposals are unlikely to adversely impact on the amenities of nearby and surrounding development.

Representations

The application has been advertised as a major development via site notices and within a local newspaper. This is in line with the Council's adopted Statement of Community Involvement

Final publicity date expired: 07/08/2025

No representations are received.

Consultation Responses

Health & Safety Executive - Advises 'Do Not Advise Against'. Northern Gas Networks have been consulted regarding nearby pipelines; no planning objection is raised. An informative will advise continued liaison with the operator regarding any easements/wayleaves during construction.

K.C. Ecology Unit – Ecology support delivery via the landscaping scheme (rather than a 30-year obligation) due to the modest on-site gains. A CEMP: Biodiversity will address protected species precautions, pollution prevention and measures regarding Sparrow Wood LNR

K.C. Environmental Health – No objection subject to conditions.

K.C. Highways – Support subject to conditions

K.C. Lead Local Flood Authority - supports continued discharge to the existing public surface water sewer, noting the modest increase in drained area and negligible impact. Attenuation is not required. A compliance condition requires implementation in accordance with the FRA/maintenance plan.

K.C. Trees – support following further clarity of no dig works to the north of the site

K.C. Waste Strategy (Refuse & Recycling) – Support amended proposals

Northern Gas – Initial objection withdrawn.

The Mining Remediation Authority - The built development proposed falls outside the defined Development High Risk Area. Therefore, a Coal Mining Risk Assessment is not necessary. No objections.

Planning Policy

Kirklees Local Plan (KLP)

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The

statutory Development Plan for Kirklees is the Local Plan (adopted 27th February 2019).

The site lies in a Priority Employment Area (PEA) and Flood Zone 2 on the LP Policies Map. The following KLP policies will be relevant in assessing the proposals:

- LP1 – Presumption in favour of sustainable development
- LP2 – Place shaping
- LP8 - Safeguarding employment land and premises
- LP13 – Town centre uses
- LP21 - Highway and access
- LP24 - Design
- LP26 - Renewable and low carbon energy
- LP27 - Flood risk
- LP30 - Biodiversity & Geodiversity
- LP31 - Strategic Green Infrastructure Network
- LP32 - Landscape
- LP33 – Trees

Other relevant local guidance and documents are

- Highway Design Guide SPD (2019)
- Biodiversity Net Gain Technical Advice Note (2021)
- Planning Applications Climate Change Guidance (2021)
- West Yorkshire Low Emissions Strategy and Air Quality and Emissions Technical
- Planning Guidance (2016)

National Policies and Guidance

National planning policy and guidance is set out in National Policy Statements, primarily the National Planning Policy Framework (NPPF) 2024, and the Planning Practice Guidance Suite (PPGS), first launched 6th March 2014, together with Circulars, Ministerial Statements and associated technical guidance. The NPPF constitutes guidance for local planning authorities and is a material consideration in determining applications.

- Chapter 6- Building a strong, competitive economy
- Chapter 9 - Promoting sustainable transport
- Chapter 12 – Achieving well-designed places
- Chapter 14 - Meeting the challenge of climate change, flooding and coastal change

- Chapter 15 – Conserving and enhancing the natural environment
- Chapter 16 – Conserving and enhancing the historic environment

Climate change

The council approved Climate Emergency measures at its meeting of full Council on 16/01/2019, and the West Yorkshire Combined Authority has pledged that the Leeds City Region would reach net zero carbon emissions by 2038. A draft Carbon Emission Reduction Pathways Technical Report (July 2020, Element Energy), setting out how carbon reductions might be achieved, has been published by the West Yorkshire Combined Authority.

On 12/11/2019 the council adopted a target for achieving 'net zero' carbon emissions by 2038, with an accompanying carbon budget set by the Tyndall Centre for Climate Change Research. National Planning Policy includes a requirement to promote carbon reduction and enhance resilience to climate change through the planning system, and these principles have been incorporated into the formulation of Local Plan policies. The Local Plan predates the declaration of a climate emergency and the net zero carbon target; however, it includes a series of policies which are used to assess the suitability of planning applications in the context of climate change. When determining planning applications, the council would use the relevant Local Plan policies and guidance documents to embed the climate change agenda

Assessment

The following matters are considered in the assessment below:

- 1) Principle of development
 - 1) Climate Change and Sustainability
- 2) Design and Character (including landscape and trees)
- 3) Amenity
- 4) Highway and access
- 5) Flood Risk and Sequential / Exception Test
- 6) Ecology and Biodiversity Net Gain (BNG)
- 7) Waste and Refuse
- 8) Other matters (Air Quality, Health & Safety / Major Hazard/ pipelines/contamination)
- 9) Conclusion

Principle of development

The National Planning Policy Framework (the Framework), which is a material consideration in planning decisions, confirms that planning law requires applications for planning permission to be determined in accordance with the

development plan, unless material considerations indicate otherwise. This approach is confirmed within Policy LP1 of the Kirklees Local Plan, which states that when considering development proposals, the Council would take a positive approach that reflects the presumption in favour of sustainable development contained within the Framework. Policy LP1 also clarifies that proposals that accord with the policies in the Kirklees Local Plan would be approved without delay, unless material considerations indicate otherwise.

Development within a Priority Employment Area (PEA)

The site lies in a Priority Employment Area (PEA). Policy LP8 states:

Proposals for development or re-development for employment generating uses (as defined in the Glossary) in Priority Employment Areas will be supported where there is no conflict with the established employment uses (as defined in the Glossary) in the area. In instances where the site is out of centre and the proposal includes main town centre uses then policy LP13 will need to be applied.

Officers are satisfied that the proposal would not conflict with any of the nearby established employment uses, given the comparable nature of the proposal along with the separation distance between the proposed extension and neighboring units.

The proposed development is considered to be a main town centre use and therefore consideration of LP13 is required, and undertaken below.

Subject to the assessment against LP13, the proposal is deemed to comply with LP8.

Main town centre use

Policy LP13 requires proposals for main-town-centre uses (including large-scale offices) to be directed to defined centres, supported by a sequential assessment, where located outside them. However, it allows for office development that is ancillary to industrial or distribution uses within established employment locations where operational needs justify such an approach. Similarly, the NPPF gives significant weight to supporting economic growth and enabling the expansion and adaptation of existing businesses in appropriate locations that make effective use of employment land and infrastructure.

As noted above, the site forms part of the Bretton Park Industrial Estate, identified as a priority employment area within the KLP. It accommodates UK Greetings Ltd, a long-established and major local employer engaged in

manufacturing, design, warehousing, and distribution activities linked to the greeting-card and publishing sector. The proposal seeks permission for a three-storey office extension to the southern elevation of the main building, together with car park reconfiguration and associated landscaping. Proposals will deliver approximately 2800sqm additional office floorspace directly ancillary to an existing employment operation.

The applicant has confirmed:

“It is intended that the extensions will form development of UK Greetings by collating all assets from secondary facilities in the UK and form a main Headquarters for the UK division.”

This represents the consolidation of administrative and creative functions that currently operate from several sites across Kirklees, principally Bretton Park, Cannon Way and Mill Street (Dewsbury) into one integrated headquarters. Such rationalisation would strengthen operational efficiency, reduce duplicated travel and operating costs, and safeguard high value employment within the district. The scheme therefore aligns with LP8, which encourages investment that reinforces the function and longevity of established employment sites without introducing conflicting uses.

With respect to Policy LP13, although alternative sites have not been formally assessed through a sequential test, the applicant's submission provides a robust operational justification for this approach. It explains that the proposal is driven by the need to bring together departments currently based at Bretton Park, Cannon Way and Mill Street onto a single site to enable closer day to day collaboration. This consolidation is intended to decrease inefficiencies, reduce travel and operating costs, and remove delays that affect the businesses productivity. The relationship between the existing and proposed floorspace has been evaluated by the company as pivotal to its economic and operational evolution.

In these circumstances, no reasonably available alternative sites within defined town centres have been considered, since the parameters of the proposal are requiring the need for physical and functional integration of an existing business on this established site. Offices of this nature are not considered standalone town centre uses but an ancillary and essential component of a single employment enterprise that could not be reasonably sited elsewhere. In effect, the 'search area' for the sequential test would be reasonably limited to just the site, for the operational reasons identified. On that basis, the absence of a formal sequential test is accepted as reasonable and compliant with the intent of LP13 and the NPPF, which both recognise the

legitimacy of locating operationally linked office accommodation within designated employment areas.

In summary, the proposal would modernise and consolidate an existing major employer within a designated employment area, enhancing operational efficiency and retaining high value jobs within Kirklees. It accords with Policies LP8 and LP13 of the KLP and NPPF Chapter 6, which collectively support the expansion and adaptation of established businesses in sustainable locations. The principle of development is therefore acceptable.

Climate Change and Sustainability

KLP Policy LP24(d) requires energy-efficient design, use of low-carbon technologies and water efficiency. Similarly, Policy LP26, supports incorporation of decentralised low carbon energy technologies and the NPPF encourages adaptation to climate change and reduction of greenhouse-gas emissions.

The submitted Climate Change Statement identifies a suite of sustainability measures:

- Enhanced building-fabric performance and thermal efficiency;
- Efficient LED lighting systems;
- EV charging infrastructure with passive provision for future expansion; and
- Water-efficient sanitary fittings.

These features will reduce operational carbon intensity and align with the Council's net-zero objectives. Subject to a condition requiring these measures to be implemented, the proposals will contribute positively to carbon-reduction and energy-efficiency targets and comply with KLP Policies LP24(d), LP26 and NPPF Chapter 14.

Design and Character (including landscape and trees)

Relevant design policies include LP2 and LP24 of the Local Plan and Chapter 12 of the NPPF. These policies seek development to harmonise and respect the surrounding environment, through high quality design, incorporating good architecture, townscape integration, appropriate scale, massing and materials, and promoting inclusive access and legibility.

The proposed extension would be positioned on the southern elevation, designed as a coherent architectural addition to the existing structure. It would

include a textured and darker brick palette with aluminium-framed glazing and curtain-wall elements, capped by a flat/parapet roof. Its height (approx. 12.3m) remains subordinate to the host ridge, maintaining visual balance across this elevation. The proposed materials of the extension, although in contrast with the host building, would be seen as a modern and innovative addition, breaking up the blandness of the existing typical industrial buildings/materials in the area. Due to the siting, scale and design the extension would form an integral and appealing addition to this site without detracting from the visual amenity of the area in accordance with policy LP24 of the KLP. The materials proposed are considered appropriate. This together with the siting of the extension to the rear of the building, which will largely be screened from the surroundings by the host building and existing landscaping on the periphery of the site. Therefore, in this instance it is not considered necessary to view a sample of external facing materials.

The façade composition introduces a modern rhythm while reflecting the proportions of the existing structure. Revised landscaping will soften the building's base and visually connect the southern frontage to pedestrian routes within the site. A dedicated 2m pedestrian path within the northern part of the site and rationalised car-park aisles improve legibility and safe access. Development carried out in accordance with the submitted proposed materials will ensure the visual amenity of the site and the surrounding area is not unduly compromised.

Turning to landscape and trees, KLP Policy LP32 requires proposal to be designed to take into account and seek to enhance the landscape character of the area, particularly to protect views, retain natural features. Likewise, Policy LP33 seeks retention of valuable trees which aligns with chapter 12 of the NPPF (paragraphs 133–142) for well-designed, locally sympathetic development.

Both soft and hard landscape (including car park layouts) proposals will provide good aesthetically pleasing soft landscaping and planting, to enhance the site and area.

The proposed landscaping, while limited, is appropriate and commensurate to the nature of the proposal.

KC Trees officer supports the scheme on the basis confirmation is received from the applicant advising that there will be no digging required to the northern part of the site. As such the proposals will not impinge on the existing trees, whilst not protected they do provide amenity value in the area. The proposals will therefore comply with KLP Policies LP32 and LP33 and guidance in the NPPF.

In summary the proposals are considered would achieve a high standard of design appropriate to its industrial-estate context in accordance with relevant Local Plan Policies and guidance in the NPPF.

Amenity

Policy LP24(b) of the KLP advises that proposals should provide a high standard of amenity for future and neighbouring occupiers, including maintaining appropriate distances between buildings.

The surrounding land uses are predominantly B2/B8 industrial and warehouse premises with no sensitive residential receptors. The nearest dwelling is in excess of 400m away, with various intervening commercial properties, negating concerns of overbearing, overshadowing, or overlooking.

In terms of noise, the office extension will not intensify mechanical plant or late-hour activity.

External lighting details are submitted as show on drawing W0321-ORB-XX-XX-DR- E -63-XX-00 Rev P01. Given the premises are well screened and not in close proximity of any sensitive receptors, it is considered there would be no concerns over glare, light spillage.

With regards to construction impacts (hours, noise, vibrations and dust) this can be managed through a Construction Environmental Management Plan, recommended to be conditioned, as advised by Environmental Health officers.

The car parking will remain in the same areas as currently used on site, albeit more formal layouts. As such no likely concerns over noise to neighbouring development.

Subject to the recommended condition, it is considered that the proposal would not result in material loss of amenity and would comply with KLP Policy LP24(b).

Highway and Access

KLP Policy LP21 requires that development should provide safe and suitable access for all users, adequate parking, servicing and internal layout in accordance with Council standards. This is consistent with the Highway Design Guide SPD (2019) and NPPF Chapter 9 – Promoting Sustainable Transport which also seeks to minimise conflict between vehicles and pedestrians and promote modal shift.

KC Highways Development Management (HDM) on consideration of the submitted Transport Statement provides the following assessment:

The extension will accommodate existing staff relocating from a second building, operated by the applicant, on Mill Street East at the junction with Warren Street.

Access

The Site is located within Bretton Business Park, to the east of Bretton Park Way. The site is currently occupied by UK Greetings Ltd.

The site takes access directly from Bretton Park Way in two locations. The first access, 'Gate A' is on the western boundary of the site and is used by staff and visitors to access the car park only. The second access 'Gate B' is located to the northern boundary of the site, from where deliveries and outgoing goods movements are undertaken.

The operation

The nature of the operation is such that the Bretton Park Way site is a seasonal distribution centre that runs at peak in September through to January. Thus, the number of staff on site changes throughout the year.

At present there are a maximum of 124 staff employed at the Bretton Park Way Site and 264 at the Mill Street East site, both in part and full-time working patterns.

The company operates two-day shifts between 0600 to 1400 and 1400 to 2200, and night shifts for a smaller number of employees at Bretton Park Way. 18 employees on the day shift and 3 on the night shift.

The remaining staff are on site between 2 and 5 days every week and are office-based (All staff are on site Tuesday and Wednesday). These staff work an 8-hour shift of their choosing between the hours of 0600 and 1800.

Staff numbers

The maximum number of staff members on the Bretton Park Way site will occur at the shift change period at 1400 hours on a Tuesday and

Wednesday. There will be 121 staff members on site at Bretton Park Way.

There will be a maximum of 264 staff at Mill Street on a Tuesday and Wednesday. This is a maximum of 385 staff across the two sites at any time.

Survey

The applicant has provided the results of a travel survey which was distributed to the existing employees at both sites to understand to understand their current travel. Responses to the questionnaires were received from 49 staff members in total; 22 staff members located at Bretton Park Way and 27 staff members at Mill Street.

An average of 69% of staff drive themselves to work from the staff travel survey.

The travel survey also identifies the staff arrival and departure times 88% arrive during the 0800-0900 peak hours, with 12% arriving before 0800 hours.

50% staff leave before 1630 hours, 33% between 1630 and 1700, 11% between 1700 and 1730, and 6% leave after 1730 hours.

The largest numbers of staff are those working the office shift, between 2 and 5 days at the site and during office hours. A total of 367 future staff.

Census data provided suggests 77.8% of those travelling to work do so by car.

Parking

The existing staff and visitor car parking is accessed from Gate A and provides 240 no. car parking spaces.

The additional 50 parking spaces are provided in a new area of parking accessed via the Gate B access. The parking area will be located to the north of the Gate B access and protected from the movement of goods vehicles to the delivery bays within this area. Pedestrian walkways and crossings will be provided to ensure safe passage of pedestrians to the main building. This proposed parking area will only be required at times where the maximum number of staff are on site

i.e. Tuesday and Wednesdays and during the peak season of production. At other times this car park can be shut off and not used.

If staff mode share for car-use remains at 69%, the 385 staff members will require 266 parking spaces. Based on the census data at 78% 300 spaces would be required. A total of 290 parking spaces is shown to be provided across both car parks.

Note. At the Mill Street East Site, there are just 21 car parking space.

Servicing

Refuse / servicing collection will be from the existing Gate B access and will utilise the available turning space within the development curtilage.

Trip generation

Census data provided suggests 77.8% of those travelling to work do so by car This figure has been used alongside the survey-based information to estimate the peak hour trip generation for the site.

The morning peak hour based on the derived traffic generation is 0800 to 0900 hours. The morning peak traffic generation is 181 vehicles arrivals and 0 vehicles departures, a total of 181 vehicles.

The evening peak hour based on the derived traffic generation is 1630-1730 hours. The evening peak traffic generation is 0 vehicles arrivals and 90 vehicles departures, a total of 90 vehicles.

The evening peak hour based on the derived traffic generation is 1630-1730 hours. The evening peak traffic generation is 0 vehicles arrivals and 90 vehicles departures, a total of 90 vehicles.

Trips on the local highway network have been assigned to the network based on the percentage directional splits observed in the traffic surveys.

It is considered that operational assessment is required of the following junctions to identify the impact of the development:

*Junction 1 – Bretton Street / Mill Street East / Bretton Park Way; and
Junction 2 – B6409 Savile Road / Mill Street East / Mill Street West.*

Junction 1 has been modelled using the PICADY function within the Junctions 9 software and Junction

2 (traffic signalled) has been modelled using LINSIG.

These assessments demonstrate that the junctions operate within capacity in the 2030 design scenario and therefore can accommodate the proposed development”.

Highways Development Management Comments

Highways Development Management would generally agree with the conclusions of the Transport Statement and have therefore no objection to these proposals.

In summary, access for staff and visitors would continue via Gate A; HGV servicing will remain via Gate B, maintaining separation of movements. The reconfigured parking layout would deliver 290 spaces, including 12 accessible bays and 12 EV charging points, with secure/covered cycle parking (minimum 18 spaces). Pedestrian safety is enhanced through a segregated walkway and marked crossings linking the parking areas to the main entrance. The layout accords with the Council's design standards for bay dimensions and aisle widths.

HDM has confirmed no severe residual impact on the local network, subject to conditioning the car park layout to be provided prior to the extension being brought into use. The proposals will provide safe and suitable access and will comply with KLP Policy LP21, the Highway Design Guide SPD and NPPF Chapter 9.

Flood Risk and Sequential / Exception Test

Policy LP27 requires proposals within areas of flood risk to be accompanied by a site specific Flood Risk Assessment (FRA) and for the sequential approach to be applied to steer development to areas of lowest flood probability. Policy LP28 requires development to ensure surface-water runoff is appropriately managed and does not increase flood risk elsewhere. Both policies align with NPPF Chapter 14 and the Environment Agency's Standing Advice.

The site lies within Flood Zone 2, where offices are classified as 'less vulnerable' development. An FRA has been provided to evaluate flood risk, demonstrate safe access/egress, and confirm that the development will not increase flood risk on or off site.

Sequential Test

The NPPF requires the Sequential Test to be applied in a manner that is practical and proportionate to the nature of the proposal. National guidance, including EA Standing Advice, recognises that where development is functionally or operationally linked to an existing site, the sequential search area may legitimately be restricted to that site alone.

The proposal is a three-storey office extension forming an ancillary and operationally essential component of UK Greetings long-established manufacturing, design and distribution operations at Bretton Park. The applicant has explained that the scheme will consolidate administrative and creative teams currently dispersed across Bretton Park, Cannon Way and Mill Street into a single integrated headquarters. This location is required to improve operational efficiency, reduce duplicated travel and costs, and support the business's evolving functional needs.

Because the proposed floorspace must physically adjoin the existing facility to deliver these benefits, the development cannot reasonably be located elsewhere. Ancillary offices of this type are not standalone main town-centre uses but a necessary extension of a single employment enterprise. As such, no alternative external sites are capable of meeting the identified operational parameters. It is therefore appropriate for the sequential search area to be limited to the Bretton Park site, and this approach is fully compliant with LP27, the NPPF and EA Standing Advice.

A site specific sequential approach has also been applied to the layout, the office extension is positioned on one of the more elevated parts of the operational complex, while less vulnerable uses (parking, circulation and landscaping) remain in the areas of marginally higher residual flood risk. This satisfies the requirement to place more vulnerable uses in the areas of lowest flood risk within the site boundary.

Exception Test

Under the Flood Risk Vulnerability Classification, office development is categorised as 'less vulnerable'. Less vulnerable uses do not require the Exception Test in Flood Zone 2. Consequently, the Exception Test is not applicable, and national policy confirms that its application is unnecessary.

Surface Water and Drainage:

The FRA confirms that the extension does not displace flood flows or reduce floodplain capacity. The scheme incorporates appropriate surface-water management consistent with LP28, ensuring no increase in run off or downstream flood risk. Given that the extension is constructed within an already developed and predominantly impermeable operational area, the effects on drainage are limited and controllable.

The proposal meets the requirements of LP27 and LP28, the NPPF, and EA Standing Advice. The sequential approach has been correctly confined to the operational site due to the essential functional dependence between the proposed office accommodation and the existing business. The Exception Test is not required.

Overall, the proposal represents the expansion of an existing Kirklees employer on undeveloped land within a designated employment area, supporting operational efficiency and delivering new jobs within the district.

The submitted FRA confirms that finished-floor levels and site drainage can ensure safety without increasing off-site risk. Surface-water discharge will continue to the existing public sewer at restricted rates. The Lead Local Flood Authority supports the approach, noting the limited increase in impermeable area and negligible cumulative impact and confirm no conditions are needed. Nevertheless, it is considered necessary to impose a condition to require the compliance of the submitted FRA and the Drainage Maintenance Management Plan to ensure the proposals accord with KLP Policies LP27 and LP28 and NPPF Chapter 14.

Ecology and Biodiversity Net Gain (BNG)

KLP Policy LP30 requires that planning decisions protect and enhance the biodiversity of Kirklees. Development proposals are therefore required to result in no significant loss or harm to biodiversity and to provide net biodiversity gains. Similarly, KLP Policy LP31 and guidance in the NPPF supports enhancement of ecological connectivity and requires developments to provide measurable biodiversity net gain (minimum 10 %).

The application is supported by a Preliminary Ecological Appraisal (PEA) which has been reviewed by K.C. Ecology. The proposal is not considered to cause direct harm to local species. However, the ecology officer recommends a condition to secure the net gain is provided and maintained for an aftercare period as well as a Construction Environment Management Plan (CEMP) condition. The recommended conditions will secure measurable biodiversity improvements consistent with KLP Policies LP30, LP31 and NPPF Chapter

15 and will control construction-phase effects, including protection of the adjacent Sparrow Wood LNR approximately 550m east.

Ecological net gain

The provision of a Biodiversity Net Gain (BNG) of 10% is a mandatory requirement for developments in England under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (hereafter the Act). This is subject to limited exceptions. Unless exempt, every planning permission granted pursuant to an application submitted after 12 February 2024 is deemed to have been granted subject to a pre-commencement condition requiring a Biodiversity Gain Plan to be submitted and approved by the local planning authority prior to commencement of the development.

The applicant has not put forward a case that the development is exempt from the 10% provision, nor do officers consider exemption applicable. In accordance with national guidance, the application is supported by an assessment confirming the pre-development biodiversity value of the on-site habitat, on the date of application. The site's baseline ecological value is low, comprising hardstanding and managed grassland.

The BNG Report (Envirotech, 11 Mar 2025), using the statutory metric, indicatively demonstrates a 21% net gain, achieved through new tree planting, ornamental and native shrub beds and improved grassland management. This is welcomed, however, the standard condition is to be imposed to secure the provision of a detailed strategy, and its implementation thereafter.

In accordance with The Act, due regard must be given to whether the proposed net gain (including enhanced areas of existing habitat) amounts to a significant enhancement. Significant enhancements are areas of habitat enhancement which contribute significantly to the proposed development's BNG, relative to the biodiversity value before development. The Act requires that the maintenance of these significant enhancements must be secured with a legal agreement, for a minimum of 30 years.

Given the limited habitat value on the site and the nature of the proposal, the proposal is not considered to include significant enhancements.

Waste and Refuse

LP24(d)(vi) – requires development to incorporate well-designed waste storage that allows for segregation and recycling, integrated within the site layout. KLP Policy LP43 seeks to reduce waste generation and ensure that

waste storage and collection facilities are safe, convenient and visually unobtrusive. The Kirklees Highway Design Guide SPD sets out operational requirements for refuse collection, including drag out distances and surface construction suitable for wheeled containers

The proposal includes a dedicated timber-clad bin compound in the south-west corner of the site, located over 6m from the building and designed to accommodate both general and recyclable waste streams. The Waste Strategy Officer advises that the surface leading to the compound must be capable of supporting the point loading and repeated manoeuvring of commercial bins without rutting, cracking or pitting. During the case officer's site inspection, the north-western access route to this area was confirmed to be hard surfaced, consistent with these operational requirements.

The location allows for short drag out distances, safe turning movements, and unobstructed collection, avoiding any risk of "bin blight" or conflict with vehicle or pedestrian circulation. The compound is therefore considered appropriately sited, visually contained, and compliant with LP24(d)(vi), LP43, and the Highway Design Guide SPD in respect of refuse collection standards.

As waste management on commercial sites is governed by separate legislation including the Duty of Care and waste handling regulations. It is not necessary to secure this element by condition. The responsibility lies with the site operator to comply with statutory requirements and relevant environmental guidance. An advisory note will, however, clarify that permission does not extend to the additional bin store shown adjacent to the new extension on the external lighting plan.

The proposals as amended will provide for safe and efficient waste management facilities on site, without negative impacts of bin blight on the neighbourhood and meet policy requirements of LP24 part d (vi) and LP43 and the Kirklees Highway Design Guide SPD in respect of refuse collection.

Other Matters (Air Quality, Health & Safety / Major Hazard Pipelines/Contamination)

Air Quality

KLP Policy LP24 requires avoidance and mitigation of unacceptable air-pollution impacts. To support the proposals an Air Quality Assessment was received during the course of the application.

West Yorkshire Low Emissions Strategy (2016) and Air Quality & Emissions TAN (2019) promote EV infrastructure and travel planning.

An Air Quality Assessment accompanying the application demonstrates that pollutant concentrations would remain well below national objectives. EV charging infrastructure, active-travel facilities and an enforceable Travel Plan provide proportionate mitigation. Implementation of EVCPs and a Construction Environmental Management Plan (CEMP) would manage dust during construction. This is to be controlled by conditions to ensure the proposals are policy compliant.

Health & Safety / Major Hazard Pipelines

The site falls within consultation distances for existing gas-pipeline infrastructure. The HSE has returned a “Do Not Advise Against” response, and Northern Gas Networks has confirmed no objection subject to observance of easement restrictions, following discussions with the applicant and Northern Gas.

Other than informative notes that are proposed, to remind the developer of the need to secure written consent before carrying out excavation or piling near buried apparatus, Northern Gas have advised that no conditions are required. The proposal raises no public-safety concerns and complies with national and local policy on major-hazard infrastructure. The development poses no significant risk to public health or safety and delivers proportionate air-quality mitigation in accordance with LP24, WYLES guidance and the NPPF.

Land contamination

The application is accompanied by the following documents:

- Phase I Geoenvironmental Desk Study Report, authored by JPG, ref: 6359-JPG-XXXX-RP-G-0601-S2-P01, dated 11 February 2025
- Phase 2 Geo-environmental Investigation authored by JPG, ref: 6359-JPG-XX-XX-RPG-0603-S2-P01, dated April 2025, and
- additional Technical Note: Ground Gas Risk Assessment by JPG, ref: 6359-JPG-XX-XX-RP-G-0604-S2-P01, dated 18 November 2025

Environmental Health officers (in their consultation response dated 03/12/2025) accept the findings of the submitted information, which concludes that:

“the combination of gas results during monitoring and their interpretation of previous remediation of the site is sufficient to

characterise the site as a CS1. Reaffirming, no additional protection is required within the new footprint”

As such, they raise no objections subject to the imposition of a standard condition to deal with unexpected contamination appropriately, will be necessary in accordance with Policy LP53 of the Local Plan and Chapter 11 of the NPPF.

Conclusion

The proposal represents a significant investment by an established local employer within a designated Priority Employment Area, supporting Kirklees’s economic-growth objectives. It consolidates employment functions onto a sustainable, serviced site, will deliver high quality design and landscaping, acceptable access and parking, and manage flood risk and drainage appropriately together with incorporates an energy efficient design and securing measurable biodiversity net gain.

Consultees concerns are addressed and where appropriate can be resolved through conditions without undermining the development’s acceptability.

When read as a whole, the scheme complies with the KLP and the NPPF and approval is recommended subject to the conditions and informative notes set out below.

Recommendation: Approve

Report Dated: 05/12/2025

Application Number: 2025/91202

Decision Authorisation: Delegated Powers

Officer Recommendation: C.F.P

Conditions and Reasons

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: Pursuant to the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended) to prevent the accumulation of unimplemented permissions.

2. The development shall be carried out in complete accordance with the plans and specifications listed in this decision notice, except as may be specified in the conditions attached to this permission which shall in all cases take precedence.

Reason: For the avoidance of doubt as to what is being permitted and to ensure a satisfactory standard of development in accordance with Policies LP1, LP2, LP24 and LP26 of the Kirklees Local Plan.

3. Prior to construction commencing, a Construction Environmental Management Plan (CEMP) shall be submitted to and agreed in writing with the Local Planning Authority. The plan shall describe in detail the actions that will be taken to minimise adverse impacts on occupiers of nearby properties by effectively controlling:

- Noise & vibration arising from all construction related activities. This should also include suitable restrictions on the hours of working on the site including times of deliveries.
- Dust arising from all construction related activities, which should include measures to monitor and record the emissions of dust during construction
- Parking and management of staff vehicles during construction works
- Parking for construction workers
- Loading and unloading of plant and materials
- Storage of plant and materials and
- Signage

Details of the responsible person, their contact details and how this will be communicated to residents and the Local Authority must be included.

The agreed plan shall be adhered to throughout the construction of the development.

Reason: To ensure and safeguard the amenities of the occupiers of nearby development is not unduly compromised, in accordance with part 15 of the National Planning Policy Framework and LP52 of the Kirklees Local Plan. This pre-commencement condition is necessary to ensure measures to avoid obstruction to the wider highway network, to avoid increased risks to highway safety, and to prevent or minimise amenity impacts are devised and agreed at an appropriate stage of the development process.

4. The development shall not be brought into use until all car park areas and the proposed 2m walk way to provide dedicated pedestrian route from new car parking as indicated on drawing 2467 Rev, P2 and 2467 Rev, P1 have been marked out in accordance with these details. Thereafter the car park areas and pedestrian route shall be retained, free of obstructions and available for the use(s) specified on the submitted/listed plan(s) for the lifetime of the development.

Reason: To ensure that sufficient parking is provided and retained to serve the development, in the interest of the safe and efficient operation of the highway and to comply with the aims of Policy LP21 of the Kirklees Local Plan.

5. Prior to the hereby approved development being brought into use, the cycle spaces and store as shown on drawing 2467 Rev. P2 shall be completed and made ready for use. Thereafter the cycle spaces and facilities shall be retained.

Reason: To promote and encourage use of sustainable travel in accordance with Policy LP21 of the Kirklees Local Plan

6. The development shall be carried out in accordance with the submitted Flood Risk Assessment, Ref: 6359-JPG-XX-XX-RP-D-0620-S2, Rev, P01 and surface water drainage system shall be maintained for the lifetime of the development in accordance with the Drainage Maintenance Management Plan, Ref: 6359-JPG-XX-XX-RP-D-0622-S2, Rev P01 prepared by JPG (dated 28/02/2025).

Reason: To ensure satisfactory drainage and to mitigate flood risk in accordance with Policies LP27 and LP28 of the Kirklees Local Plan and Chapter 14 of the National Planning Policy Framework.

7. No works shall take place until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. The CEMP (Biodiversity) shall include the following:

- a) Summary of potentially damaging activities
- b) Identification of "biodiversity protection zones"

- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (these may be provided as a set of method statements)
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.
- i) Specific plans/documents to ensure the Pollution Prevention of watercourses and ponds near the site (using good practice guidance such as CIRIA C532), and
- j) Mitigation / precautionary measures for the Sparrow Wood LNR.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

Reason: This pre commencement condition is required to ensure the interests of and to protect biodiversity during construction by avoiding direct impacts to protected species and to accord with Kirklees Local Plan Policy LP30 and guidance in the National Planning Policy Framework.

8. Soft and hard landscaping details shown on the approved landscaping drawing Ref: PWP 942 001 01, Rev 01 shall be implemented in the first growing season following completion of the development or before occupation of the hereby approved extension, whichever is sooner unless otherwise agreed in writing within an alternative timescale by the Local Planning Authority. The approved landscaping scheme shall, from its completion, be maintained for a period of five years. If, within this period, any tree, shrub or hedge shall die, become diseased or be removed, it shall be replaced with others of similar size and species unless the Local Planning Authority gives its written consent to any variation.

Reason: In the interests of local ecological value and visual amenity, and to accord with Policies LP24, LP30, LP32 and LP33 of the Kirklees Local Plan and the National Planning Policy Framework

9. Prior to commencing the superstructure of the hereby approved extension, a scheme outlining the specific facilities for charging electric vehicles, other ultra-low emission vehicles for parking at the premises and details of when these shall be incorporated into the development, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall meet the minimum requirements in the current West Yorkshire Low Emission

Strategy (WYLES) document to provide 10% of parking spaces which may be phased with 5% initial provision and the remainder within 5 years of occupation. The approved facilities must be installed in accordance with the approved details and timescales and retained for use thereafter.

Reason: In the interest of supporting and encouraging low emission vehicles, in the interest of air quality enhancement, to comply with the aims and objectives of Policies LP20, LP24 and LP47 of the Kirklees Local Plan, Chapters 2, 9 and 15 of the National Planning Policy Framework and the West Yorkshire Low Emission Strategy (WYLES).

10. The development shall be completed in accordance with the measures set out in the submitted Climate Change Statement, Revision 01, dated 08 April 2025, before the hereby approve extension is brought into use. The measures shall thereafter be retained in accordance with these approved details.

Reason: To address the impacts of climate change and the council's declaration of a Climate Change Emergency and to promote resilience to it and to comply with Policies LP24(d), LP26 and guidance in the National Planning Policy Framework

11. If contamination, or evidence of coal workings is encountered during the development, all works in the affected area (except for site investigation works) shall cease immediately and the Local Planning Authority shall be notified in writing within 2 working days. Works in the affected area shall not recommence until either (a) a Remediation Strategy by a suitably competent person has been submitted to and approved in writing by the Local Planning Authority or (b) the Local Planning Authority has confirmed in writing that remediation measures are not required. The Remediation Strategy shall include a timetable for the implementation and completion of the approved remediation measures. Thereafter remediation of the site shall be carried out and completed in accordance with the approved Remediation Strategy.

Following completion of any measures identified in the approved Remediation Strategy a Verification Report shall be submitted to the Local Planning Authority. No part of the site shall be brought into use until such time as that part of the site has been remediated in accordance with the approved Remediation Strategy and a Verification Report in respect of those works has been approved in writing by the Local Planning Authority.

Reason: To ensure the safe occupation of the site in accordance with Policy LP53 of the Kirklees Local Plan and paragraph nos. 189 and 190 of the National Planning Policy Framework.

FOOTNOTE: Statutory BNG Condition
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In accordance Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) **development may not be begun unless:**

- a) A biodiversity gain plan has been submitted to the local planning authority; and
- b) The local planning authority has approved the plan.

The biodiversity gain plan must include:

- a) Information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
- b) The pre-development biodiversity value of the onsite habitat;
- c) The post-development biodiversity value of the onsite habitat;
- d) Any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
- e) Any biodiversity credits purchased for the development; and
- f) Any such other matters as the Secretary of State may by regulations specify.

FOOTNOTE

For full advice on existing gas-pipeline infrastructure, in the vicinity of the site and the potential impact of the proposals, please see advice of Northern Gas Networks on link below to ensure the proposal raises no public-safety concerns and complies with national and local policy on major-hazard infrastructure.

[Planning application details | Kirklees Council](#)

FOOTNOTE

Notwithstanding the submitted External Lighting Scheme as shown on drawing Ref: W0321-ORB-XX-XX-DR-E-63-XX-00 P01, this permission does not extend to the bin store shown adjacent to the new extension or any other bin storage area within 6m of the approved extension.

FOOTNOTE

If any coal mining features are unexpectedly encountered during development, this should be reported immediately to the Mining Remediation

Authority on 0800 288 4242. Further information is available on the Mining Remediation Authority website at: Mining Remediation Authority - GOV.UK

FOOTNOTE

The granting of planning permission does not authorise the carrying out of works within the highway, for which the written permission of the Council as Highway Authority is required. You are required to consult the Design Engineer (Kirklees Street Scene: 01484 221000) regarding obtaining this permission and approval of the construction specification. Please also note that the construction of vehicle crossings within the highway is deemed to be major works for the purposes of the New Roads and Street Works Act 1991 (Section 84 and 85). Interference with the highway without such permission is an offence which could lead to prosecution.

FOOTNOTE

All contamination reports shall be prepared by a suitably competent person, as defined in Annex 2 of the National Planning Policy Framework 2021. Reports must be prepared in accordance with the following guidance:

- *Land Contamination Risk Management (LCRM)*
- BS 10175:2011+ A2:2017 *Investigation of Potentially Contaminated Sites. Code of Practice*
- *Development on Land Affected by Contamination - Technical Guidance for Developers, Landowners & Consultants - (v11.2) June 2020* by the Yorkshire and Lincolnshire Pollution Advisory Group.

The conditions relate to Planning Control only. Approval under the Building Regulations may also be required, and the applicant should contact their Building Control Provider for further information. Any other necessary consent must be obtained from the appropriate authority. If the applicant commences work without discharging conditions, they will be at risk of enforcement action and invalidating the permission if the planning condition is a pre commencement condition.

FOOTNOTE

For further information regarding dust control, guidance can be found in the Institute of Air Quality Management (IAQM) document "*Guidance on the assessment of dust from demolition and construction*" Version 2.2 2024.

Plans and specifications schedule:

Plan Type	Reference	Version	Date Received
Location plan	2000 Rev, P2		25/06/2025
Existing site plan	2001 Rev, P1		01/05/2025
Existing elevations	2005 Rev, P1		01/05/2025
Existing site sections	2009 Rev, P1		01/05/2025
Revised proposed site plan	2002 Rev, P2		08/08/2025
Landscape masterplan & specification	PWP 942 001 01 Rev, 01		14/08/2025
Revised proposed elevations	2006 Rev, P3		13/08//2025
Proposed site sections	2010 Rev, P1		01/05/2025
Constraints plan	2011 Rev, P1		01/05/2025
External materials	2008 Rev, P1		01/05/2025
Roof plan	2007 Rev, P1		01/05/2025
Proposed floor plans	2004 Rev, P1		01/05/2025
External Lighting Scheme	W0321-ORB-XX-XX-DR-E-63-XX-00 P01		01/05/2025
Drainage Layout	6359-JPG-ZZ-ZZ-DR-D-1400-S2-P01		01/05/2025
Bin store details	2013 Rev, P1		01/05/2025
Cycle store details	2012 Rev, P1		01/05/2025
Technical Note: Ground gas risk assessment	6359-JPG-XX-XX-RP-G-0604-S2-P01, dated 18 November 2025		18/11/2025
Air Quality Assessment	J0997/1/F1, dated 09 October 2025		09/10/2025
Geoenvironmental desk study report	6359-JPG-XX-XX-RP-G-0601-S2-P01, dated 11 February 2025		08/08/2025
Geoenvironmental ground investigation	6359-JPG-XX-XX-RP-G-0603-S2-P01, dated April 2025		08/08/2025
Revised Design & access statement			08/08/2025
Planning statement			25/06/2025
Climate Change Statement	Revision No: 01, dated 08 April 2025		01/05/2025
Transport Assessment	25009, dated 23 April 2025		01/05/2025
Travel Plan	25009 Dated 23 April 2025		01/05/2025
Preliminary Ecological Appraisal	9631 Rev, 1		01/05/2025
Biodiversity Net Gain	9631 Rev, 1		01/05/2025
Drainage Maintenance Management Plan	6359-JPG-XX-XX-RP-D-0622-S2-P01, dated 28 February 2025		01/05/2025
Drainage Impact Assessment	6359-JPG-XX-XX-RP-D-0621-S2-P01		01/05/2025

Plan Type	Reference	Version	Date Received
Flood Risk Assessment	6359-JPG-XX-XX-RP-D-0620-S2-P01		01/05/2025

Pursuant to article 35 (2) of the Town and Country Planning (Development Management Procedure) Order 2015 and guidance in the National Planning Policy Framework, the Local Planning Authority have, where possible, made a pre-application advice service available, complied with the Kirklees Development Management Charter 2015 and otherwise actively engaged with the applicant in dealing with the application.

The case officer proactively undertook negotiations with the applicant during the course of the application, to secure further information and drawings relating to a number of matters and securing further amended plans and technical information including confirmation from Northern Gas on the reason for withdrawing their initial objection. The above conditions have also been shared with and agreed to by the applicant.