

Planning Statement

**Reliance Precision, Rowley Mills and International House,
Penistone Road, Fenay Bridge, Huddersfield, HD8 0LE**

Reliance Precision Ltd

December 2025

Contents

1.	Introduction	3
2.	Site Location and Description	5
3.	Planning History	7
4.	Policy Analysis and the Principle of the Development.....	8
5.	Green Belt Issues.....	11
	“Grey Belt”	11
	Grey Belt Conclusions	19
	Green Belt Considerations	20
	Green Belt Conclusions	27
6.	Heritage Issues	28
	Heritage Asset Significance	28
	Effects on Significance	29
	Heritage Conclusions	34
7.	Other Material Considerations	36
8.	Planning Balance	46

1. Introduction

- 1.1 This planning statement has been prepared in support of an application lodged by Reliance Precision Ltd.
- 1.2 Reliance are an important advanced manufacturing business, operating across a range of sectors and providing custom built, high reliability, precision instrumentation. They design, develop, prototype, manufacture, assemble and test products to suit individual requirements. They manufacture and assemble components, sub-systems and complete instruments for use in medical, aerospace, space and life science settings.
- 1.3 The application seeks the reconfiguration of their existing Rowley Mills site. This will rationalise and extend the space- to enhance it's operational efficiency and allow safer working practices.
- 1.4 They have also acquired International House from Paxman Coolers. That building benefits from a historic permission that would see a modest extension of the existing building at first floor level. That additional building would create a distinct operational area for parts of the Reliance operation.
- 1.5 These two elements of the business would function as separate, standalone, parts of the same operation.
- 1.6 The application seeks:
- (a) The demolition of 4,306sqft / 400sqm of space at Rowley Mills
 - (b) The creation of a new 3 storey entrance building at Rowley Mill- using natural stone, wood cladding and a curved green roof, totalling 15,100sqft / 1,402 sqm GEA
 - (c) A 2 storey rear extension at Rowley Mill, totalling 16,700 sqft / 1,551 sqm GEA
 - (d) A car park extension at the front of the Rowley Mills site, alongside minor external changes to the existing yard area, and a revised site access
 - (e) Repeating the extant approval for additional space at International House, granted under 2022/91909 which provided for first floor extensions on the eastern (267.7sqm) and western (162.4sqm) wings of the building, as well as car park improvements. This application also includes a new entrance door to the southern elevation that would be used periodically for new machinery to be moved into the eastern side of the building.
 - (f) Total new floorspace of 32,884sqft / 3,055sqm
- 1.7 This application is supported by the following information:
- Design and Access Statement, KPP Architects
 - Transport Statement, Via Solutions
 - Travel Plan, Via Solutions
 - Tree surveys, JCA
 - Ground Conditions Report, Dunelm

- Preliminary Ecological Appraisal, Envirotech
- Statement of Community Consultation, Royal Pilgrim Communications
- Flood Risk Assessment and Drainage Strategy, Dudleys
- Landscape Strategy, PWP Design
- Sustainability, Orbis
- Noise Assessment, Blue Tree Acoustics
- Air Quality Assessment, AQA
- This Planning Statement.

1.8 This statement addresses the following key issues:

- A description of the site and surroundings,
- A review of the relevant planning history,
- A review of the relevant policies, including our assessment of whether the proposed development complies with the Development Plan,
- A review of the principle of the development and whether it is acceptable in planning terms,
- A review of the technical supporting information for this application- with a particular focus on Green Belt, Heritage, Amenity and Operational matters
- A review of the key benefits that arise from this development, and
- Consideration of the planning balance that we see in this case.

1.9 In overview, we consider that this application deviates from elements of the Local Plan, but has considerable benefits that justify granting planning permission in this case. This statement sets out the reasoning and justification behind that conclusion.

2. Site Location and Description

2.1 The site straddles Penistone Road, the A629, just south of Fenay Bridge and Lepton and south east of Huddersfield.

2.2 The site location is shown below:



2.3 The site is already densely developed as employment space.

2.4 Rowley Mills is a complex of buildings which have grown and joined together over a number of decades. It has well vegetated boundaries, and sits lower than the agricultural land to the north and the railway embankment to the east. The land to the north now has planning permission for redevelopment as housing, and Reliance are engaged in ongoing discussions with the developer of that site regarding the relationship between their ongoing industrial use of Rowley Mills, and the introduction of more sensitive residents to the north.

2.5 To the south of Rowley Mills lie a number of residential properties, on Ashford Manor and Dogley Villa Court. These properties coexist with Reliance at the moment, and whilst they are separated by trees and Beldon Brook, their close proximity has necessarily resulted in positive Discussions between the applicant and local residents to address any issues around noise and disturbance.

2.6 International House is an existing industrial building, currently occupied by Paxman Scalp Coolers. Paxman has sold the freehold to Reliance and is currently in the process of relocating to another unit in the Huddersfield area which secured a resolution to approve in December 2025. They are due to vacate the building by 2026, at which point Reliance intend to deliver the physical improvements which Paxman secured permission for in 2022.

2.7 To it's south are an electricity substation and Pembroke House- which is also a light industrial unit, currently occupied by Loading Systems. To the west lies open countryside, and to the north there are a number of residential properties, accessed off Woodsome Road. The relationship to these properties is discussed further in the Heritage and Immunity sections of this report.

3. Planning History

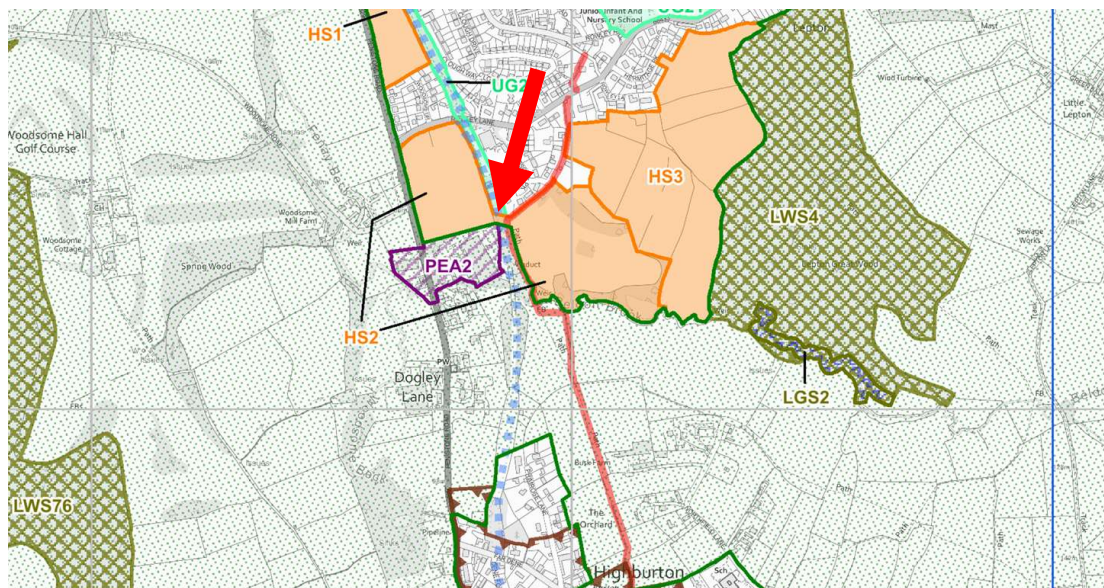
- 3.1 Rowley Mills has a long planning history. There has been a mill on the Rowley Mills site since at least the 1840's, if not earlier. The mill complex has grown to its current format over this extended period. Reliance purchased Rowley Mills in the 1980's. Modern records show a number of extensions having been approved in the 1990's and early 2000's, with a three storey extension having been approved in March 2005¹. There are also more incidental approvals for signage, a generator room, substations, electrical plant rooms.
- 3.2 The southern part of the Rowley Mills site has trees that are subject to preservation orders. The recent application was approved to undertake works to these trees for purely arboricultural reasons- These were to remove trees that were suffering from ash dieback, as well as two Alder (on of which had major cavities in it's trunk, and a second which had had a poor form and was close to electrical equipment) and a sycamore, which as leaning towards the building and suffered from considerable ivy growth. These works were unrelated to the current application.
- 3.3 International House Has a history of conversion dating back to the late 1980's. Following the refusal of an application to turn a redundant agricultural building into a nursery sales outlet, permission was granted for changing those buildings to a light industrial use in 1987². A number of minor changes were made to that building in 1987, 1996 and 2002.
- 3.4 The main history of interest at International House is application Reference 2022/91909. This secured permission for "*Erection of first floor extensions to form office and storage space, re-configuration of internal layout to form additional and amended workshop space, storage space, and staff facilities, re-location of office space into proposed extension. and formation of 14 additional car parking spaces and bin storage area*".
- 3.5 Permission was secured on the 16th of September 2022, with a 3 year deadline to implement. That permission expired in September 2025.
- 3.6 Reliance therefore intend to duplicate that previous permission. The only changes that will be made are minor enhancements to the car parking area in order to ensure that there are suitable levels of disabled and electric vehicle parking. Further landscaping will also be provided at the northern boundary, In order to contribute to biodiversity and landscaping objectives, as well as providing screening for the few residents that live to the north of International House.

¹ 2004/94899

² 87/00839

4. Policy Analysis and the Principle of the Development

- 4.1 The Development Plan is the Kirklees Local Plan, adopted in 2019. The site is included in “PEA 2” a Priority Employment Area designation. It is also “washed over” by the Green Belt.
- 4.2 These are conflicting policy designations. The PEA designation encourages employment development whilst the Green Belt seeks to preserve open land, in order to restrict urban growth and maintain the distinct identities of settlements.
- 4.3 This statement explores this conflict in more detail, and ultimately concludes that the proposed development meets the expectations of the relevant policies in the Adopted Plan. This is in accordance with the conclusions drawn during pre-application discussions, and it is noted that the concept of “Grey Belt” has since been introduced which further reinforces this conclusion.
- 4.4 The site’s designations in the Local Plan are shown in the extract below:



- 4.5 Section 5 considers Green Belt issues in detail. It concludes that the site is “grey belt”, and therefore the proposed development is not inappropriate in the Green Belt. However, even if the Council do not accept that analysis, there are “very special circumstances” which clearly outweigh the harm arising to the Green Belt- this is primarily due to the socio-economic importance of the applicant’s business, but also a result of the considerable history, past development and modest change proposed by this application. In short, the site is highly urbanised already and these changes are either very modest (in the case of Rowley Mills) or previously approved (in the case of International House).
- 4.6 Policy LP8 governs proposals on PEA sites. It is entirely supportive of the proposed development. The proposed development would not create any conflict with established employment uses. No “main town centre uses” are proposed and there are no “non-employment generating uses”.

- 4.7 This policy seeks to protect employment uses on employment sites- which this proposal would clearly deliver. The application proposals clearly comply with this policy.
- 4.8 However, it is important to consider the conflict between this policy and the Green Belt status of this site, as discussed above. One policy designation seeks to maintain an entirely open site, whilst the other encourages employment development. It is not uncommon for a Development Plan to have conflicting policies³. The correct approach to this policy tension is to consider whether the proposal accords with the plan “as a whole” and to determine which is the “dominant policy” to which greater weight should be given⁴. This is a matter of planning judgement, and provided the judgements made are not irrational, that judgment is likely to be sound from a legal perspective.
- 4.9 On this basis, the applicant sets out
- a) their view on the benefits to be derived from this proposal (Sections 5 and 10) and
 - b) the harm which results from these modest extensions to a highly urbanised previously developed site, which has a very long history of industrial development and also recent approvals for industrial uses.
- 4.10 The applicant suggests that it would be irrational to find that it is necessary to refuse this proposal in order to preserve the openness of a site which is patently not “open” in the slightest.
- 4.11 Given the undoubted benefits of this proposal, and the limited harm arising, we suggest that Policy LP8 should be given greater weight than the Green Belt policy in this case- despite the national policy position of requiring that substantial weight is given to Green Belt harm⁵. We suggest that the competing interests at play in this case, fall clearly in favour of approving this development.
- 4.12 Policy LP8, in part, aims to stem the loss of land from employment uses to housing, which the Plan suggests is around 11Ha per annum. Recent data, in the Council’s AMR’s, suggest that around 2.5Ha of employment land is lost to housing every year:
- 4.13 Data from the Council’s AMR’s, since the adoption of the plan shows the following losses:

Year	Loss (Ha)
2023/24	-0.31
2022/23	-2.8 Ha
2021/22	-0.8 Ha
2020/21	-4.12 Ha
2019/20	-4.78 Ha
Total	12.81 Ha
Average	2.5 Ha per annum

³ See for example [Corbett, R \(On the Application Of\) v \[2020\] EWCA Civ 508 \(09 April 2020\)](#)

⁴ [TW Logistics, R \(on the application of\) v Tendring District Council & Anor \[2013\] EWCA Civ 9 \(24 January 2013\)](#) para 18

⁵ NPPF 153

4.14 This is a longer term trend. The Council’s Employment Land Supply Report sets out losses from the employment land supply for the period prior to the current Plan being adopted, as follows:

Year	Loss (Ha)
ELSR 2019 ⁶	5.76Ha
ELSR 2018	2.59Ha
ELSR 2017	1.95Ha
ELSR 2016	2.64Ha
ELSR 2015	0.92Ha
Total	13.86Ha
Average	2.77Ha per annum

4.15 As can be seen, a similar picture exists in the 5 year run up to the Local Plan being adopted. There is a long term trend for a loss of around 2.7Ha⁷ of employment land per annum. The Council is now preparing a new Local Plan, which- given the tight Green Belt boundaries across the District- will have to include additional Green Belt sites to meet future employment needs.

4.16 In this context, some considerable weight should also be given to the Development Plan policy which protect existing employment land- especially given the current condition of the application site, which is far from being a pristine open site.

4.17 There are notable socio-economic, district profile, skill seeding and apprenticeship benefits, not to mention the significant role that Reliance play in the local advanced manufacturing cluster. This is not a case of saving a “basic” employment site- this is about saving the future of a very significant business for Kirklees as a whole, and keeping them in the District.

4.18 Sections 6, 7 and 9 of this report consider all other relevant material considerations. It is concluded that no harm arises that would justify refusing planning permission in this case. This suggests that there are no other issues of policy compliance.

4.19 It is concluded that the proposed development accords with the Development Plan when read as a whole. Therefore, it is necessary to consider whether there are material considerations that might outweigh the statutory presumption in favour of the Development Plan conferred by S38(6) of the Planning and Compulsory Purchase Act 2004.

⁶ All figures taken from the relevant ELSR report “Summary Table 1” from the “Losses” row

⁷ The 10 year average from the data above is 2.67Ha per annum over the 10 years data presented above.

5. Green Belt Issues

- 5.1 As discussed in Section 4, the site is both within the Green Belt and is also a PEA allocation.
- 5.2 Policy LP57 provides for most of the exceptions set out in NPPF. The guidance it offers on building extensions is that the original building should remain dominant, and notes that that the cumulative impact of previous extensions will be taken into account. The “original building” is that which was present on 1 July 1948⁸ and the site has been extensively extended since that time.
- 5.3 As the site is also “washed over” by Green Belt, it is necessary to consider whether this proposal accords with one of the exceptions set out in NPPF, or whether very special circumstances need to be demonstrated. This was discussed during the pre-application stage, where it was concluded that the applicant’s outline very special circumstances case was broadly accepted. However, policy has changed since that discussion and a new exception has been added to the NPPF which is considered to be relevant in this case.
- 5.4 The necessary information to update and expand on that pre-application discussion is set out in detail in this section of the report.

“Grey Belt”

- 5.5 The revised NPPF, issued in December 2024 included the concept of “grey belt”⁹ which states that commercial development in the Green Belt should not be regarded as inappropriate where it:
- Would utilise grey belt land,
 - would not fundamentally undermine the purposes of the remaining Green Belt across the area of the Plan,
 - where there is a demonstrable need for the type of development proposed
 - where it is a sustainable location¹⁰, and
 - where “golden rules” are met. These relate to affordable housing, providing new green spaces (for residents, biodiversity and landscape reasons) and delivering necessary improvements to local or national infrastructure¹¹.
- 5.6 Where a development is grey belt and complies with the golden rules, it should be given significant weight in favour of granting permission¹².

⁸ As defined in the glossary of NPPF

⁹ NPPF155

¹⁰ NPPF 155

¹¹ NPPF 156

¹² NPPF 158

5.7 This policy was only introduced in December 2024. However, since then there have been a number of appeal decisions which have considered how to apply this policy approach. The approach adopted by Inspectors has been to:

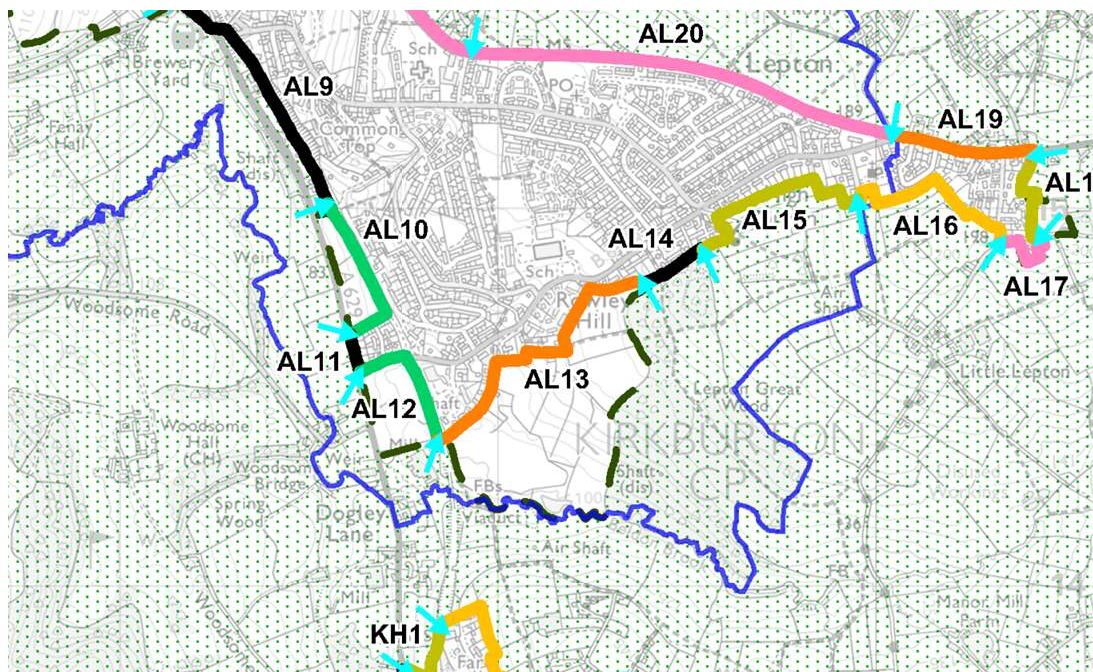
- (a) Apply the Grey Belt definition, which includes a Green Belt contributions test against purposes a, b and d
- (b) Consider whether footnote 7 applies- essentially whether the site is a sensitive designation¹³
- (c) Apply the appropriateness tests in NPPF155 (undermining wider purposes, demonstrable need and sustainable location)
- (d) Apply the Golden Rules as far as they are relevant

5.8 The applicant suggests that, in this case the analysis shows that this site is Grey Belt and therefore capable of being approved as an exception. The tests are considered below.

Apply the Grey Belt definition

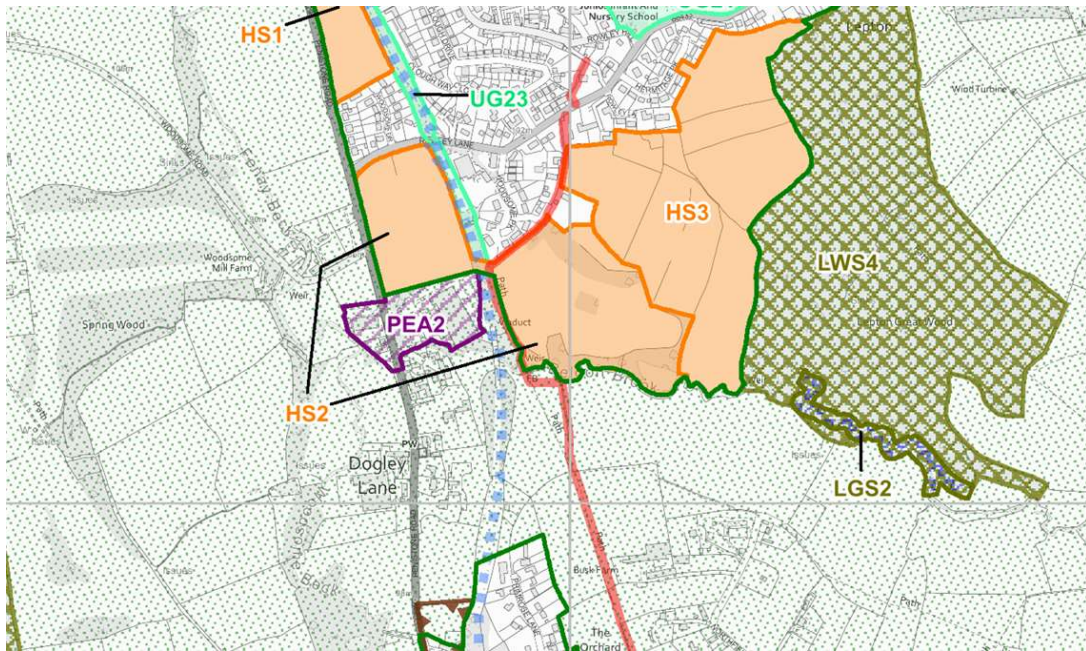
1. Green Belt contributions test against purposes a), b) and d)

5.9 The site was not considered as part of the Council’s Green Belt Edge Review undertaken as part of the Local Plan preparation in April 2017. The adjacent boundaries (AL12 and AL13) scored 1 and 4 respectively:



¹³ Including: habitats sites; Sites of Special Scientific Interest; Local Green Space; a National Landscape; a National Park; Heritage Coast; irreplaceable habitats; designated heritage assets, and areas at risk of flooding or coastal change.

5.10 However, the boundary was changed in this location and allocations HS2 and HS3 were confirmed by the Inspector:



5.11 In the absence of a review conducted by the Council the applicant offers the following view on performance against Purposes a), b) and d):

a) to check the unrestricted sprawl of large built-up areas

The area of the site is already heavily developed for industrial purposes. The harm arising from development has already occurred. There would be no additional area of development within the site other than replacing existing footprint and developing within the existing built complex.

It is suggested that the site currently plays no role at all in restricting sprawl.

b) to prevent neighbouring towns merging into one another

The site is surrounded by built development on three sides. The southern Green Belt edge of Fenay Bridge / Lepton is now defined by allocation HS3. Whilst that is not developed yet, that is the extent of the Green Belt designation. At its closest point, Highburton is some 285m from allocation HS3. The site is some 350m from the closest point of Highburton.

The site isn't located at the current "pinch point" between Lepton / Fenay Bridge and Highburton. The risk of merging is greater from a recently made allocation and so the site isn't the main determinant of whether merging would occur. Also the site already developed and the proposed extensions are to the north of the site, rather than the south. The application would not add any building mass to the critical location where it could be argued that merging would occur.

It is suggested that the site and proposed development does not strongly contribute to this purpose.

d) *to preserve the setting and special character of historic towns*

Whilst this area of the District does have some historic interest, that interest is not based on a particular urban morphology. This purpose applies better to settlements like York, where the urban form is an inherent part of understanding how the city functioned in the past, and where its compact urban form is important in interpreting its historic importance. This purpose is not considered to be relevant to this site.

5.12 It is suggested that this site does not strongly perform any of the relevant Green Belt purposes which are important for defining the site as Grey Belt.

2. Consider whether footnote 7 applies

5.13 The Grey Belt definition also requires consideration of whether the site sits in any of the assets or designations listed in footnote 7. These are considered in the table below:

Asset	Relevance
Habitats sites (and those sites listed in paragraph 189- namely National Parks, the Broads and National Landscapes) and/or designated as Sites of Special Scientific Interest	Not relevant- the site is not within any of these designations.
Green Belt	Not relevant- this is specifically excluded by the Grey Belt definition
Local Green Space	Not relevant- the site is not within this local designation.
National Landscape	Not relevant- the site is not within this designation.
National Park (or within the Broads Authority) or defined as Heritage Coast	Not relevant- the site is not within this designation.
Irreplaceable habitats- This is defined in the NPPF Glossary as including ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen	Not relevant- the site is not within any of these designations or habitat types.
Designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75)	The site is not a designated heritage asset and has been subject to modern disturbance- both from the construction of the M62 and the construction of the pub.
Areas at risk of flooding or coastal change	Small parts of the site are within flood zones 2 and 3. These are on the periphery of the application boundary, and no development is being proposed in those areas. Drainage and flooding work which accompanied the International House application demonstrated that the amendments

Asset	Relevance
	<p>to that building are capable of being approved. Similarly, the drainage and flooding work included with this application demonstrates that the amendments to the Rowley Mills site will not impact on flood risk. Whilst parts of the application site are arguably within this asset. The definition of grey belt in the glossary of NPPF. Only suggests that these are relevant where they “would provide a strong reason for refusing or restricting development”. That is not considered to be the case with this application and therefore Parts of the site being within flood zone two and three would not exclude this application from being considered as a grey belt site.</p> <p>The site is obviously at some distance from the coast, so that is not considered to be relevant.</p>

- 5.14 The site does not affect any of the listed designations. The definition of Grey Belt land provided in NPPF suggests that- in order to fail this element of the consideration these designations would need to “provide a strong reason for refusing or restricting development”. That is clearly not the case in this application, and so it is concluded that the footnote 7 designations are not relevant. This part of the process has been passed.

Apply the Appropriateness Tests in NPPF 155

1. Undermining wider Green Belt purposes

- 5.15 As this boundary section was not assessed by the Council, the applicant suggests the performance of the site against purposes c) and e) are very limited, and that the wider role of the Green Belt in this location is not undermined.
- 5.16 Purpose c) is concerned with safeguarding the countryside from encroachment. This is already a previously developed site, with considerable development on site, and art of the proposal (at International House) already has an implementable planning permission. There would be no real change as a result of these modest extensions.
- 5.17 Purpose e) is concerned with assisting urban regeneration by encouraging the recycling of urban land. These sites are already urban land. Alternative sites are considered later in this report, and it is concluded that no site exists in Kirklees which could meet Reliance’s needs. This proposal is actually recycling urban land and so the objectives of this purpose ae met.
- 5.18 The wider role of this area of Green Belt is primarily about maintaining separation between Fenay Bridge / Lepton and Highburton. That is discussed above, and the site no longer plays

the most important role in that consideration, as it is not at the closest point between the settlements. None of the other purposes are undermined and so it is considered that the wider role of the Green Belt in this area is maintained.

- 5.19 The applicant considers that the wider role of the Green Belt in this area would be maintained if the application goes ahead.

2. Demonstrable need

- 5.20 The supply of employment land provided in the adopted Plan was affected by several high-profile deletions of strategic sites. This has affected the District's ability to meet employment needs.
- 5.21 Cooper Bridge was identified in the Leeds City Region Strategic Economic Plan¹⁴ as a "*major employment growth opportunity*"¹⁵. However, draft allocation E1832c was deleted from the Plan by the Inspector because of heritage effects. This left only 4Ha of brownfield element remaining from the allocation- a site which is now subject to an application for the expansion of John Cotton, a local manufacturer. This change to the Plan during the EIP removed 29Ha (net) of highly accessible strategic employment land from the Plan.
- 5.22 Equally, a major employment allocation at Clayton West, draft allocation E2333a, was deleted by the Inspector as it would harm the setting and character of the village. This removed 16.82Ha of employment land (15Ha net) from the Plan.
- 5.23 Whitechapel Road in Cleckheaton (E1831) was also reduced from 25Ha in the Publication Draft Plan to 11Ha in the Adopted version (ES6) due to the presence of a high pressure gas pipeline and buffer area.
- 5.24 These high profile deletions of strategically located employment land took a considerable amount of good quality land away from the supply.
- 5.25 The Spatial Development Strategy in the Publication Draft Plan sought to allocate 165Ha of land in order to achieve 75% employment rate over the Plan Period¹⁶. The Adopted Plan reduced its ambitions to just 95Ha of new employment land to achieve the same level of employment outcome¹⁷.
- 5.26 That very nearly halved the available employment land supply, leaving just 57% of the originally proposed allocations intact.
- 5.27 The resulting supply (arguably) met OAN¹⁸, which was identified at 175Ha. However, it shifted the reliance of the supply available to meet that need onto the estimated 48Ha of supply provided by the Priority Employment Area (PEA) sites. These are generally small,

¹⁴ <https://www.westyorks-ca.gov.uk/media/1110/strategic-economic-plan.pdf>

¹⁵ Page 32 LCR SEP 2016-2036

¹⁶ Section 6.1 Policies and Strategies DPD Publication Draft Plan.

¹⁷ Section 6.1 Policies and Strategies DPD Adopted version

¹⁸ Objectively Assessed Needs

remnant sites in poorer locations, which are less suitable to meet the needs of major businesses which the Council wish to keep and encourage to locate into Kirklees.

5.28 The harm caused by this loss is recognised in the recent Cabinet papers which justified a full Local Plan Review to meet both housing and employment land needs.

5.29 The press releases associated with the local Plan review quoted Cllr Turner, Cabinet Member for Finance and Regeneration as follows:

The Local Plan is about how we work within our current constraints to deliver that potential – strengthening our local economy, creating much-needed housing, and bringing huge benefits for everyone who lives and works in Kirklees.¹⁹

5.30 This public facing message places greater emphasis on economic growth than housing needs.

5.31 The review papers²⁰ found the following key points relating to employment land:

- *the assessment has identified **issues relating to the achievement of sufficient jobs across the district** to meet the 23,000 jobs target set out in the Local Plan including concerns about achieving sufficient jobs from remaining 4 employment allocations and **issues around the spatial distribution of employment opportunities**.*
- *the council's **employment delivery and land supply is borderline** and there are concerns that the delivery of potential 1,782 jobs that may be delivered from employment/mixed-use allocations are yet to enter the planning process.*
- *key site allocations are unlikely to deliver housing/employment targets within the Plan period which will impact on the delivery of the Kirklees spatial strategy [our emphasis]*

5.32 It is clear that there is a delivery concern around employment land and jobs- as well as around housing provision. Whilst employment land may not be as high profile, or even as desirable an area of practice, as housing delivery in professional circles, it is a critical part of achieving balanced growth and securing a positive future for the people of Kirklees.

5.33 As discussed above, there is also a general trend of losing employment land to housing, which runs at about 3Ha per annum. That generally exacerbates the supply side issues, particularly when they started from a broadly constrained position from the point of adopting the Local Plan.

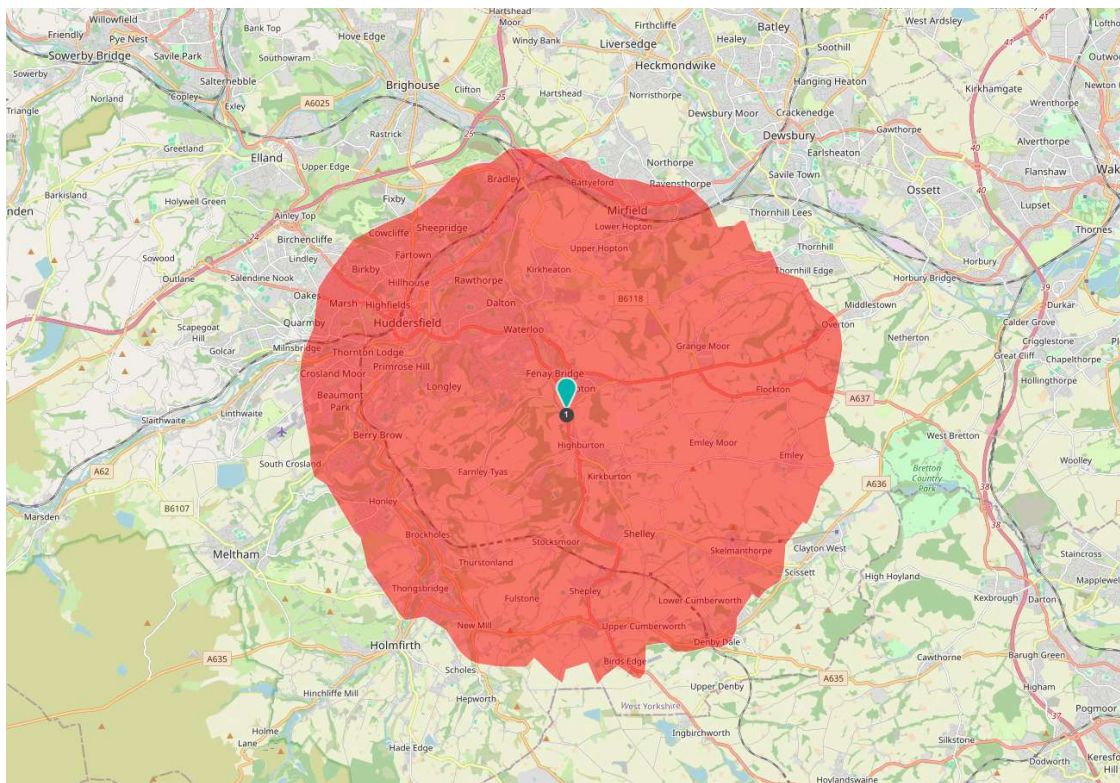
5.34 It seems clear that there is a demonstrable unmet need for employment land.

¹⁹ [Kirklees Local Plan to undergo full update - Kirklees Together](#)

²⁰ [2023-10-17 Local Plan Review-Update Cabinet Report and App1 finaldocx.pdf \(kirklees.gov.uk\)](#)

3. Sustainable location

- 5.35 NPPF 155 c. cross references paragraphs 110 and 115 of the NPPF to inform consideration of this test.
- 5.36 NPPF 110 seeks to locate development in locations that can be made sustainable- though limiting the need to travel and offering a choice of travel modes, recognising that the opportunities for sustainable travel will be different in more rural areas.
- 5.37 This site is located on the edge of the main urban area, and on a bus route with regular services into Huddersfield and villages in the south east of the District, including Clayton West, Denby Dale, Lepton and Kirkburton. Service D1 runs every 30 minutes Monday – Saturday; Services D2 and D3 run hourly over the same period. The site will also have a number of cycle parking spaces provided.
- 5.38 8km is a distance which is typically considered suitable for commuting by bike²¹. This range may now be considerably extended by the increased popularity of electric bikes, but 8km is a long accepted cycling distance appropriate for those looking to access work by bike. Electric bikes might also make this a more attractive option for a greater number of employees.
- 5.39 An 8km isochrone centred on the site is shown below:



- 5.40 This shows that most of Huddersfield; large parts of Mirfield; and a number of the rural villages south of Huddersfield are all potentially within a reasonable cycle commute of the site.

²¹ Integrating Cycling into Development Proposals, Cycling England, 2009,p4.

- 5.41 Future workers here will clearly have a choice of sustainable travel modes, and so this can be considered to be a sustainable location.
- 5.42 NPPF 115 builds on this, by expecting safe and suitable access for all users; meeting highway design standards, and; cost effective mitigation for any transport effects.
- 5.43 This has been a topic of considerable discussion at the pre-app stage. The proposal will deploy an operational management plan to control vehicles movements across Penistone Road and relocate a bus stop to ensure safe movements for vehicles pedestrians and users of the bus stop. The proposal will also enhance the number of disabled and EV enabled parking spaces, making this a more accessible site than it currently is.
- 5.44 It is clear that this can be considered to be a sustainable location.

Apply the Golden Rules

- 5.45 This section considers the Golden Rules as far as they are relevant. As this is an employment proposal, there is no requirement to provide affordable housing. However, the other two rules are relevant.

1. Necessary improvements to local or national infrastructure

- 5.46 The development includes the provision of a new bus stop and a new pedestrian crossing. Other than internal operational changes, nothing else is required to make this development acceptable. It is concluded that this rule is met.

2. Improvements to existing green spaces

- 5.47 The proposal does not involve green spaces that are available for public access - this is an employment proposal where a degree of security is required. NPPF 159 notes that such provision should also "*contribute positively to the landscape setting of the development, support nature recovery...*". It is arguable that this rule does not apply- it is clearly aimed at new POS provision in housing developments.
- 5.48 However, there are green space improvements proposed in this application which are worth noting. These will enhance the landscaped setting of the site- by planting to the north of International House, which currently has a conspicuous gap in landscape cover, and; improving the quality of the woodland surrounding Rowley Mills.

Grey Belt Conclusions

- 5.49 It is considered that the necessary requirements are met to consider this site to be Grey Belt. The site is previously developed, does not contribute strongly to purposes a), b) or d), and does not adversely affect any of the designations in footnote 7. The definition is clearly met.
- 5.50 The applicant has also considered the wider appropriateness tests and the Golden Rules as far as they are relevant to this type of development. Both suggest that defining this site as Grey Belt is appropriate.

5.51 It is therefore concluded that this proposal should not be regarded as inappropriate development, in line with NPPF 155. It is, therefore, appropriate development for which planning permission should be granted- subject to any other material considerations.

Green Belt Considerations

5.52 Given the importance of this proposal to the applicant and economic success of the wider District, the applicant is keen to ensure that there are no fundamental risks to the success of this application. There is a potential outcome where the Council do not accept that this proposal is Grey Belt, and therefore that it is inappropriate development.

5.53 To address this risk, the applicant has also set out the basis on which they consider “Very Special Circumstances” exist, which would also justify this proposal in line with NPPF 153.

5.54 NPPF says that “very special circumstances” will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations²².

5.55 Case law²³ has established that the correct approach under these circumstances is to:

- **Consider whether a proposed development is inappropriate:** It is agreed that new industrial buildings in the Green Belt are inappropriate development, although in this case the site is considered to be Grey Belt. For the purposes of this section of the report, it is assumed that the Council may not accept that analysis, and that the following information will assist in a positive decision being made.
- **Identify the level of harm to the Green Belt:** This is considered below.
- **Establish any other harm that may arise:** This is analysed in more detail later in this report, but it is concluded that there is no significant harm arising from the proposal that can't be mitigated.
- **Consider whether the “very special circumstances” outweigh that harm:** The applicant's case is set out below.

5.56 In practice, this is a “weighing up” exercise where harm is compared to benefit. These factors are both considered below.

Harm

5.57 The harm arising in this case is considered to be extremely limited for the following reasons:

- a) The combined site is already densely developed for industrial uses.

²² NPPF 153

²³ See for example *Brown v Ealing LBC* [2017] EWHC 467 (Admin); *Redhill Aerodrome Ltd. v Secretary of State for Communities and Local Government* [2014] EWCA Civ 1386; *Samuel Smith Old Brewery (Tadcaster) Limited v North Yorkshire CC* [2018] EWCA Civ 489; Appeal Ref: APP/C2741/W/19/3227359 York, Miller case for 266 homes which considered effects on ‘purposes’.

- b) Whilst the original buildings have been considerably extended in the past, the new extensions are modest in scale:
- a) The extensions to International house have already been deemed to be acceptable and permission was granted for these minor changes. These have been accepted as being in the public benefit, through the approval of the previous permission (reference 2022/91909).
 - b) The rear extension is modest in scale, well contained and visually unobtrusive. Whilst there would be a spatial impact on openness, the visual impact will be minimal.
 - c) The front extension is taller than the existing structure. However, it replaces what is currently an “eclectic” view (comprising multiple elements, building forms, materials and heights) with a more comprehensive approach that utilises natural materials and forms. It is suggested that this will also be less visually obtrusive despite it’s increased scale- as discussed in the next section of this report, views from Listed Assets will improve, with the taller element of this site visually blending into a wider view much better than the current light grey cladding. Again, whilst there will be a spatial impact, the visual impact will be modest- from a pure visual perspective it will be a positive change.
- c) The harm to openness will primarily exist in spatial terms- i.e. the physical presence of additional built volume on the site.
- d) The built elements of development are concentrated within the existing built areas of the two sites- there is no significant wider spatial impact, or spread of development across the site.
- e) There is a conflict inherent in the Local Plan: The site is allocated to protect and encourage employment uses but also to protect the openness of the Green Belt. Both of these competing interests have some statutory weight behind them, but are mutually exclusive. This presents the need for planning judgement to be used in this case, as discussed in Section 4. The applicant suggests that the allocation of the site for employment uses helps to balance the harm arising- as some change was clearly expected in this location when the Plan was drafted.
- f) The harm arising is limited to being “by definition” (i.e. theoretical) and also through change to openness, primarily in a spatial sense.

5.58 The harm to openness is considered to be modest, given the current levels of development on site; the sites allocation for employment uses; the concentration of development within the confines of the existing built complex and the limited and positive visual change that is achieved through the use of materials and screening.

Benefits

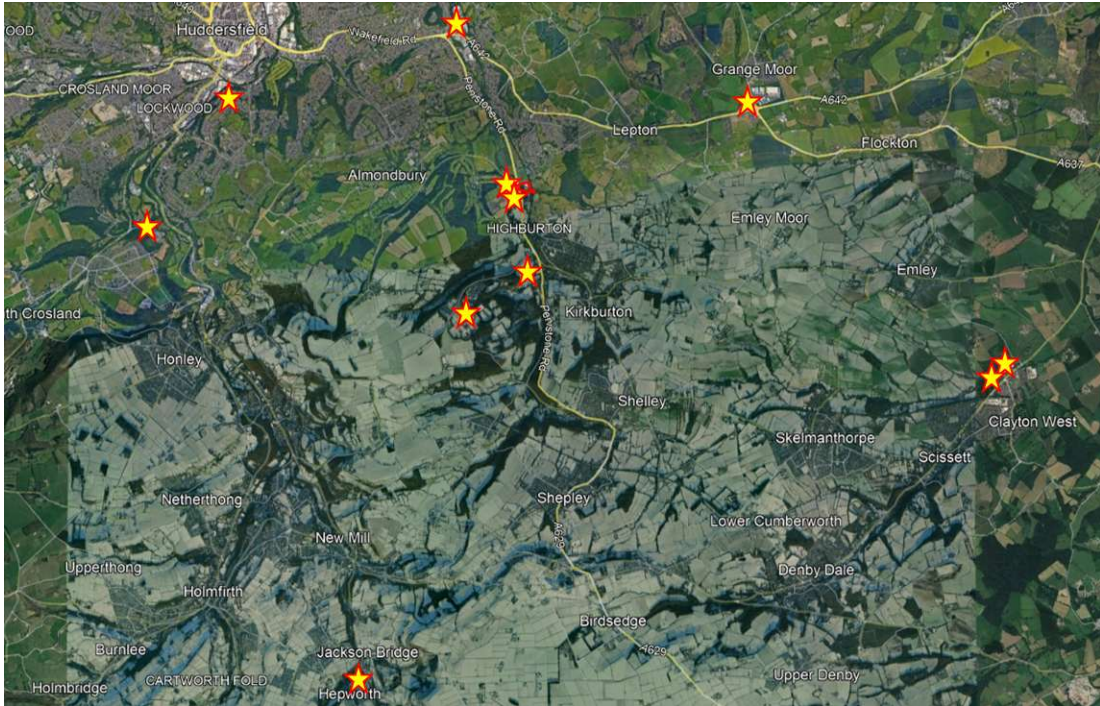
5.59 The “very special circumstances” case, should it be required, is based on the following key points:

- The lack of non-Green Belt alternatives
- The significant socio-economic benefits of the Reliance operation, and
- The need to keep those benefits in Kirklees

5.60 These are considered below.

Alternative site Options

- 5.61 Reliance have explored a number of alternative sites which might suit their requirement. This is an existing advanced manufacturing business with a work force that is clearly rooted in south-east Kirklees. 75% of employees live within 6 miles of the site, so a local solution is required in order to retain current staff and limit excess travel to work- which will benefit the objectives of the Kirklees Economic Strategy as well as the overall performance of the Council against the Climate Emergency they declared in 2019.
- 5.62 The business would also like a semi-rural location, where they can maintain a “campus feel” with a suitable amount of green space, and pleasant outlook for employees.
- 5.63 This site is Reliance’s second serious attempt to secure a local expansion. Reliance progressed pre-application discussions on an allocated site at Jackson Bridge (Dobroyd Mills MXS12) which was abandoned due to traffic and access concerns.
- 5.64 This application is the “fall back” position, resulting from their inability to find a suitable site with the right location and characteristics to meet their needs.
- 5.65 The site options considered were:
- i. Land south west of Grange Moor
 - ii. Land West of Wakefield Road, Clayton West
 - iii. PEA66, land north of Wakefield Road, Clayton West
 - iv. Land at Brooks Mill, Armitage Bridge (South of Huddersfield)
 - v. Queens Mill Industrial Estate, Huddersfield
 - vi. Tandem Industrial Estate
 - vii. MDGB1, Storthes Hall
 - viii. MXS12, Dobroyd Mill
 - ix. Land around International House, Penistone Road
 - x. Land south of International House / Loading Systems, Penistone Road
 - xi. Land at Storthes Hall Lane
- 5.66 These are shown on the map below.



5.67 The sites were discounted for the following reasons:

Site	Reason for Rejecting
Land south west of Grange Moor	Green Belt, rejected site option in Local Plan, potential playing pitch issue. Lack of certainty around delivery.
Land West of Wakefield Road, Clayton West	Green Belt, rejected site option in Local Plan. Lack of certainty around delivery.
PEA66, land north of Wakefield Road, Clayton West	Existing Industrial site with no capacity remaining.
Land at Brooks Mill / Armitage Bridge Mills, Armitage Bridge (South of Huddersfield)	Lack of capacity, Conservation Area, Listed Buildings TPO's.
Queens Mill Industrial Estate, Huddersfield	Existing Industrial site with no capacity remaining
Tandem Industrial Estate	Existing Industrial site with no capacity remaining
MDGB1, Storthes Hall	Existing permissions for care village and ongoing application for residential, utilising all Major Developed Site area.
MXS12, Dobroyd Mill	Initially selected, but rejected following negative pre-application process.

Site	Reason for Rejecting
Land around International House, Penistone Road	Green Belt, lack of certainty around delivery.
Land south of International House / Loading Systems, Penistone Road	Green Belt, Lack of certainty around delivery.
Land at Storthes Hall Lane	Green Belt, Lack of certainty around delivery.

- 5.68 Having reviewed options with the Councils Inward Investment Team over several years, it was determined that the current Reliance site is the only reasonable and currently allocated site that could meet their needs.
- 5.69 Reliance consider that this is not an ideal outcome. However, realistically, it is the most achievable and deliverable option available to them, which offers certainty around business continuity and growth, without leaving the District.

Socio-Economic Benefits

- 5.70 Reliance are a critical local business. They are an advanced manufacturing operation, which is a key local economic sector that puts Kirklees “on the map” and is recognised in the local economic strategy as being of importance to the District. The key socio-economic benefits derived from this proposal are:
- a) Job creation**
- 5.71 Reliance currently employ 210 people and aim to grow to 290 employees by 2034. This is an uplift of 80 jobs. This is notable in itself, but it is also necessary to consider the nature and quality of these jobs- the vast majority of Reliance’s workforce are highly skilled, and several other local businesses have grown from ideas developed while working for Reliance. These jobs are top quality engineering jobs.
- b) Socio-economic outputs**
- 5.72 Using the HCA Additionality Guide it is estimated that the current level of employment (210) generates a further c.60 jobs in the wider locality and c.30 jobs regionally. Using recent about productivity measures for the Leeds City Region, the current GVA of the operation is estimated to be around £17.3m per year of operation.
- 5.73 Future projections of employment levels (up to 290) would generate a further c.85 jobs in the wider locality and c.40 jobs regionally. The future GVA of the site could be around £24m.
- 5.74 This proposal will generate a considerable uplift in indirect and induced employment in the wider area, with an associated significant increase in productivity.

c) Apprenticeships

- 5.75 Reliance offers as well established apprenticeship scheme to young engineers at the start of their careers. They currently have 21 apprentices enrolled in the scheme. The business is a EAL recognised training facility, accredited by The Institution of Mechanical Engineers (IMechE) and The Institution of Engineering and Technology (IET).
- 5.76 This process is necessary to ensure that the business has the kind of specialist, highly skilled engineers available that their work demands. Approximately 25% of the workforce is made up of current or former Reliance apprentices.
- 5.77 Approximately 175 apprentice engineers have worked through the Reliance scheme (between 2 and 3 per year for c. 50 years, and between 5 and 6 per year for the last 10 years). Reliance have a high level of retention from the apprentice scheme, but some do move on at various points in their careers.

d) Seeding new and spin off businesses into the local economy

- 5.78 Reliance operate at the heart of precision engineering in Kirklees. Well trained and highly qualified people move from Reliance into the local and wider economy. The seeding of that skill base and expertise into the wider local economy helps other local advanced manufacturing / engineering businesses.
- 5.79 One local example is Wayland Additives- which has now grown to the extent that it also needs new premises in Kirklees, which is the subject of another current application before the Council. That business is also likely to become a supplier to Reliance in the near future.

e) Local economic outputs

- 5.80 Reliance source locally wherever possible, as a way of increasing the resilience of their business and reducing their carbon footprint. Their supplier spend in “HD” postcodes over the last 12 months was around £350,000. This includes parts, sub-contract operations and business services.
- 5.81 It is expected that local supplier spend will increase over time and as the business grows.

Other Benefits

- 5.82 This development makes best use of existing previously developed land, which is a key factor in national guidance. Meeting needs here would also be better than the alternatives of either leaving Kirklees, or looking to a new Green Belt site- which would not also be an employment site and would probably be more visually open, and therefore more sensitive than this site in Green Belt terms.
- 5.83 The proposed development will enhance existing habitats both on site, and adjacent to the site in the applicant’s ownership, leading to a greater than 10% enhancement of biodiversity. The submitted metric notes a 0.93unit deficit but this does take into account the off site habitat, which would be created under the control of a suitable planning condition. Whilst this is likely to exceed current legal expectations by a modest amount, the proposal far exceeds local policy requirements- which, due to the age of adopted policy, merely seeks

some level of enhancement, rather than specifying a set amount of enhancement to be achieved.

- 5.84 This is also a net benefit of the proposal that weighs against the harm likely to arise to the Green Belt.

Very Special Circumstances and Harm

- 5.85 To summarise the harm vs benefits equation inherent in NPPF 153:

Harm:

- The proposed development is “inappropriate” and therefore harmful by definition, which results in substantial harm
- The weight attributed to openness is reduced by the existing urbanising development and existing visual harm to openness; caused by the existing on-site activity, the amount of built development and the number of urbanising features on the site.
- The site is visually well contained and already urbanised, so there is low harm to visual aspects of openness.
- The site demonstrates extremely poor performance against the “five purposes”- it is already densely developed and allocated for employment uses.
- No “other harm” has been identified.

Benefits:

- Job creation, up to 80 direct new employees, and a further 90+ employees in the local and regional economy.
- Significant GVA contributions to the local economy- around a £7m pa increase.
- Significant and increasing local supplier spend.
- Extension of the market leading apprenticeship scheme for engineers entering the advanced manufacturing sector- most of whom remain local and support either Reliance or other, similar, businesses in the local advanced manufacturing cluster.
- Producing and purchasing from other similar businesses, in support of a key local cluster of activity.
- Exceedance of BNG targets
- Making best use of an existing previously developed site, to focus and realign the businesses operation without requiring new land allocations from “virgin” Green Belt.

- 5.86 The development offers considerable economic benefits and there is no other known means by which these benefits can be realised. Providing these benefits would generate very significant benefits for the people of Kirklees and help shore up it’s economic fortunes for the future, by supporting its economic strategy, growing a key local cluster of activity and maintaining a significant local business in the District. These benefits should attract very substantial weight.

- 5.87 In this case, we have established that:

- i. The harm to the Green Belt by reason of inappropriateness is substantial- but largely by definition, rather than practical effect.

- ii. Harm to both “openness” and “purposes” is limited because of the nature of the site and existing built development.
 - iii. The benefits from the development will, however, be very significant. It will help Kirklees to capitalise on its existing strengths, shoring up the significant contributions of Reliance to the maintenance and growth of the local advanced manufacturing cluster. It will also contribute towards the need to urgently address the economic, work and deprivation issues that continue to have a significant effect on the population of Kirklees.
 - iv. There is no other means currently available to provide for the needs of this important business- without this application being approved, the options for Reliance to continue to grow in Kirklees will be time limited, risking loss of their current contributions.
 - v. These benefits should attract very substantial weight.
- 5.88 We consider that the harm caused to the Green Belt is clearly outweighed by the considerable economic and other benefits that would arise from this unique proposal. On this basis, we consider that very special circumstances exist.

Green Belt Conclusions

- 5.89 The applicant suggests that this site is very clearly a Grey Belt site- It is previously developed, allocated for employment purposes, and the extensive analysis above shows that the tests set out in NPPF have clearly been met. This means it is appropriate development in the Green Belt and should be approved.
- 5.90 However, this application is extremely important for the applicant and it is critical for business continuity in Kirklees that it gets approved. On this basis, they offer an analysis of the very special circumstances which would apply, should the Council not accept the Grey Belt case. This is similar to that presented at the pre-application stage, where the applicant as given some comfort that this case would be likely to succeed. That analysis has been expanded and the same conclusions are reached: The benefits arising from this proposal, in these circumstances, clearly outweigh the limited harm that arises from two modest extensions to this existing industrial complex in the Green Belt.
- 5.91 The applicant concludes that, by whichever route the Council wishes to rely on, the Green Belt should not be a barrier to granting permission for reliance to extend their current property portfolio at Fenay Bridge.

6. Heritage Issues

6.1 Pre-application discussions noted that more detailed heritage work would be needed, with a particular concern around the effect of the new 3 storey entrance building at Rowley Mills. The following Listed Buildings have been identified with red markers indicating Grade II and the yellow being the Grade I listed Woodsome Hall:



6.2 These are:

- Grade I: Woodsome Hall
- Grade II: 1 Woodsome Road
- Grade II: Woodsome Bridge
- Grade II: Locker Room Building immediately to north of Woodsome Hall
- Grade II: Fuel Store 200 yards south east of Woodsome Hall
- Grade II: Triangular stone boundary post on Penistone Road.

6.3 It is clear that there is no direct impact on any asset, and the concern with this proposals is about setting change.

6.4 This part of the statement considers the significance of these assets and how the proposed building extension might affect that significance.

Heritage Asset Significance

6.5 Woodsome Hall was originally an Elizabethan fine hall house, built and altered over 3 generations of the Kaye family during the early 16th and mid-17th centuries. There were houses on the site previously, notably owned by the Tyas family and then Sir William

Fynchenden. When William Fynchenden died, his widow passed the manor of Woodsome and Farnley Tyas to John Cay. The Kayes were baronets and politicians, but by the third generation had no male heirs, and so the baronetcy became extinct. Elizabeth Kaye married into the Legge family, the Earl of Dartmouth, but as they were based elsewhere, the Hall eventually became a country retreat and dower house, before being let- and then sold- to the golf club in 1911²⁴.

- 6.6 The terrace in front of the house was laid out by Lancelot Capability Brown²⁵ in the mid-18th century, with a clear planned view down what is now part of the golf course, towards the application site. Tree lines frame views down the slope towards the application site, and trees on the line of Woodsome Road and the old railway line (to the rear of the site) both frame and screening the site from most views.
- 6.7 Clearly, the Hall has both architectural and historical interest, being described as “extremely fine” in the Listing, and having links to eminent local families with places still bearing their names locally. The designed landscape is also associated with the preeminent landscape architect of the time, which clearly also forms a part of that interest.
- 6.8 The Grade II Locker Room building, north of Woodsome Hall, and the Grade II fuel store to it’s south east, clearly draw their significance as structures associated with the Hall. The Locker room is thought to be a former stable building, possibly dating from the 17th Century, but having been much altered since that time. The fuel store may date in part to the 15th Century, but again has been altered with a stone slate roof having been added in the 19th Century.
- 6.9 The Grade II Listed 1 Woodsome Road is a former farm house, with an associated barn both dating from the late 18th or early 19th Century. The Grade II Listed Woodsome Bridge over Woodsome Beck / Fenay Beck is also probably from the early 19th Century, being a single span, round arched, bridge in ashlar. These structures are of interest primarily for their architecture, representing the local vernacular of the period when they were constructed. There are no obvious or significant historical associations- other than being structures which are later additions to the main road approach to Woodsome Hall.
- 6.10 The Grade II Listed triangular boundary stone, which indicates the division between Kirkburton and Lepton, is located on Penistone Road, just outside the current Loading Systems building, south of International House. This dates to the mid-late 19th Century.

Effects on Significance

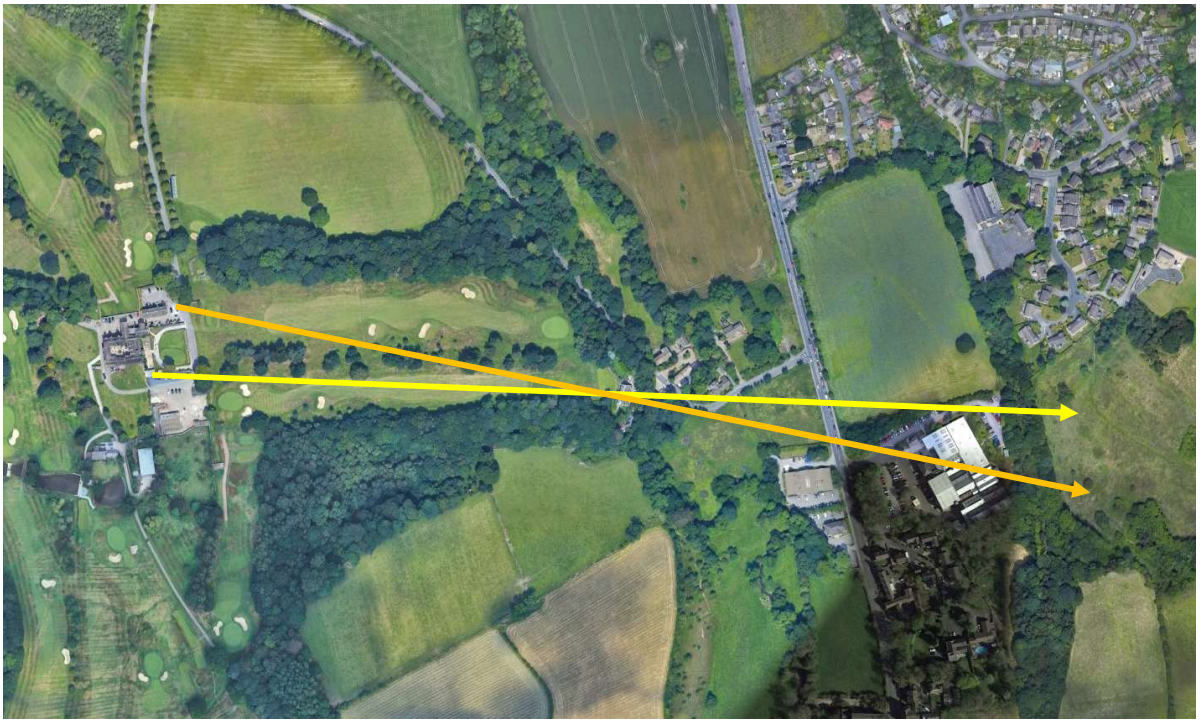
Woodsome Hall and associated structures

- 6.11 The proposed developments are set well within the existing built areas of both the Rowley Mills and International House sites. There is no intervisibility between the Listed structures and International House- this was the subject of a recent planning permission for the same form of development where heritage interests were not considered to be a concern.

²⁴ [Discovering Old Huddersfield - Huddersfield Exposed: Exploring the History of the Huddersfield Area](#)

²⁵ [Woodsome Hall, Kirkburton, West Yorkshire | Educational Images | Historic England](#)

- 6.12 There is some limited intervisibility with the more elevated parts of the Rowley Mills site- particularly from parts of the front terrace of the Hall.
- 6.13 The view down to the application site, from a Grade I Listed building over a Capability Brown landscape is clearly of some significance. However, the application site will not be visible from the southern parts of the Hall or terrace (yellow arrow below), although parts can be seen from the more northerly parts of the terrace, when looking in a south easterly direction (orange arrow below):



- 6.14 The residential development to the north of Rowley Mills is in the direct line of sight of Woodsome Hall- with views funnelled along the existing vegetation directly towards that site. That application was approved and the residential proposal is considered to have a more significant effect on the setting of this asset, due to the more direct views and open edges to that site.
- 6.15 By contrast the Rowley Mills site is well screened and visually contained, as shown in the photograph taken from the northern end of the terrace and outside Woodsome Hall- below:



- 6.16 From this viewpoint, a small part of the current roof of Rowley Mills is visible, as indicated by the red arrow above. This is a small white area in the distance, which forms a very minor part of this wider designed view. This is a photo taken when trees are not in leaf and so presents a reasonable worst case scenario.
- 6.17 This view is both distant and heavily filtered by trees and paraphernalia associated with the golf course (foreground) and the Emley Moor Transmitter (skyline in the distance) both detract the viewer from focussing on this roof- visually the current roof looks similar to the bunkers on the golf course- albeit smaller and more distant. Most of the Rowley Mills site and International House are not visible from this vantage point.
- 6.18 There has been a mill on the Rowley Mills site since at least the 1840's (if not earlier) and historic mapping suggests that a similar view of this mill would have been achieved then. The 1849 OS map has sufficient detail to allow a comparison of this view to the current aerial photograph, below:



- 6.19 The existence of a mill building in this wider designed landscape, as well as in this particular view, is therefore well established. Whilst the historic mill from that period is no longer present the small industrial influence on this view still exists today.
- 6.20 That won't materially change with the limited extensions proposed. The development will not involve removing trees from the critical areas. There will be some management to enhance the biodiversity value of the woodland, but none will be lost.
- 6.21 In addition, the light grey panelled roof is quite prominent in sunlight, as seen in the photograph above. This will become partially screened by the introduction of the taller entrance feature- which will have a green roof and be clad in wood. These materials will be much more recessive in these views and will also naturally age and blend into the landscape better over time.
- 6.22 Given the distance, likely positive change and limited effect of the current position on the views, it is considered that the development will not be likely to cause substantial harm to the setting of Woodsome Hall.
- 6.23 This conclusion was accepted during the pre-application stage, where it was suggested that "less than substantial harm" would result, with that harm to be weighed against the public benefits of the proposal. Section 5 considered the benefits of this proposal in detail, so they will not be repeated here. However, it is concluded that the considerable public benefits derived from the expansion of Reliance in Kirklees would outweigh that limited harm arising in this case.

Woodsome Road and Bridge

- 6.24 There are no views of Rowley Mills from these assets due to the intervening vegetation. It is suggested that the changes at Rowley Mills will not have any influence on the interpretation of these assets.
- 6.25 Woodsome Bridge is visually well contained and the interpretation of it's significance is not likely to be influenced by these proposed extensions. The bridge can be seen in the following photograph, taken to the west of the bridge, looking toward s International House. This shows that is it visually contained by vegetation:



- 6.26 1 Woodsome Road is close to International House and directly faces that area of the site. It has clear and direct views of the new first floor extensions now proposed, as indicated below:



- 6.27 The Paxman application wasn't accompanied by any heritage work. That proposal was approved and this application simply duplicates that form of development. There was no concern about change to setting that arose during the earlier application process. The current position is that the extension to International House is committed and could be implemented now, with no further consideration or mitigation.
- 6.28 However, as this building has a fairly clear view directly across to the extensions at International House, it is considered that some modest change could improve the currently committed position. This application proposes additional landscaping to the northern boundary of International House, which would soften and screen this view.
- 6.29 It is suggested that the application will have modest positive effect on the setting of 1 Woodsome Road, when compared to the committed position.

Boundary Stone

- 6.30 The listed boundary stone sits on Penistone Road and marks the boundary between Lepton and Kirkburton. The significance of this stone is tied to its location as a boundary marker, so in order to harm that significance, it would need to be moved physically- that is not being proposed.
- 6.31 The amendments, both International House and Rowley Mills, are not within proximity of this marker. However, modest amendments to the footpath, leading down to Penistone Road on the southern side of Rowley Mills, as well as the introduction of a pedestrian crossing island within Penistone Road, are all within close proximity of the boundary marker.

- 6.32 It is fair to say that the setting of this boundary stone is significantly influenced by modern highway infrastructure. The stone is indicated in the photograph below by a red arrow.



- 6.33 As can be seen, the modern stone wall, telegraph pole, lighting columns, street signage, road markings and substation building, all have a significant visual influence on the vicinity of the boundary stone. The introduction of a pedestrian crossing facility in this location will not have a material influence on how this stone is interpreted. It's fundamental importance is drawn from it's position on the boundary, and that will not change. Equally, the addition of the pedestrian crossing may introduce further modern visual clutter- but that is not likely to significantly alter how people read the stone.

Heritage Conclusions

- 6.34 It is the applicant's view that the proposal will not cause harm to the setting of these assets. The proposal will result in some minor visual change, but nothing that would adversely affect the intrinsic historic or architectural interest of those assets.
- 6.35 The design of the modern 3 storey extension to the front of Rowley Mills will reduce the negative effect of the existing light grey clad roof in views from the Grade I Listed Woodsome Hall. The additional planting to the north of International House will improve views from 1 Woodsome Road. The introduction of the pedestrian crossing close to the listed boundary stone on Penistone Road, is considered to be broadly neutral in the wider context.
- 6.36 It is suggested that there is no negative heritage impact which needs to be mitigated. However, in the event that the Council consider there to be less than substantial harm that arises as a result of this project, the applicant suggests that there are considerable benefits which would outweigh the limited harm arising in this case. These are discussed in detail in Section 5, but are summarised as:
- Job creation.
 - Significant GVA contributions to the local economy.
 - Significant and increasing local supplier spend.

- Extension of the market leading apprenticeship scheme for engineers entering the advanced manufacturing sector.
- Producing and purchasing from other similar businesses, in support of a key local cluster of activity.
- Modest exceedance of BNG targets
- Making best use of an existing previously developed site.

6.37 It is suggested that any heritage harm is outweighed by public benefits.

7. Other Material Considerations

7.1 The application is accompanied by a number of supporting documents. The following key conclusions are reached:

Transport

7.2 The key issue raised in pre-application discussions are around the operation of the two sites; the means of pedestrian crossing between the sites, and; how to control vehicle crossings.

7.3 The application is accompanied by a Transport Statement and Travel Plan. This concludes that the site is in a sustainable location, with a choice of travel modes available to employees at this site. It also concludes that, given the nature of the road and the speed limit, the frequency of accidents is low. Therefore, there are no current safety concerns or trends which indicate that the network does not function safely.

7.4 The Transport Statement shows that the existing vehicular access is suitable for the additional traffic that will be generated by the proposed development. However, it notes that the provision of a new pedestrian crossing island offers an opportunity to improve site access arrangements. The right turn Ghost Islands into both Rowley Mills and International House will be widened to approximately 2.6m, retaining 3m through lanes on either side.

7.5 The proposal for a pedestrian island has been developed through discussion with Kirklees Council Highway Officers and WYCA. Through a process of negotiation, it has been concluded that the safest solution would be to relocate the bus stop opposite International House to a point further South along Penistone Road. This will remain accessible for employees at Reliance, and ensure that vehicles can safely manoeuvre around the proposed pedestrian island. This design will be subject to a Stage 1 Road Safety Audit, and the brief for that work is currently being agreed and will be completed before determination of this application.

7.6 The parking proposed for each site provides for accessible, motorcycle, visitor and pool car parking, as well as Electric Vehicle Charging and Cycle parking. Parking requirements for all types of parking have been identified through analysis of travel questionnaires of existing staff at Rowley Mills and maximum staff numbers on site during a normal working week.

7.7 The proposed parking is summarised in the table below:

Parking Type	Existing		Proposed	
	Rowley Mills	International House	Rowley Mills	International House
Total spaces	138	40	160	30
Visitor	8	-	10	2
Pool Car	1	-	1	1
Electric Vehicle	7	-	13	2
Accessible	2	-	9	2
Motorcycle	3	-	12	2
Cycle	18	-	30	8

- 7.8 This should provide adequate parking to meet the needs of the business, as well as make the site more accessible and sustainable, through increasing disabled space as well as provision more EV and cycle parking.
- 7.9 The main transport concern to be addressed through this application is how the business operates. The business will be split between two sides of the A636, which is a relatively busy road, with vehicles that tend to travel at, or around, the posted speed limit of 40mph.
- 7.10 The applicant has put forward the principles of an operational management plan to ensure that there are no vehicle movements between the two sides of the road; Does any large equipment that needs to be transported between the two sides is done with suitable Banksman supervision and at non-peak times, and; that International House will be limited to light industrial uses due to limited servicing space, whereas Rowley Mills will continue to operate across a range of light and general manufacturing processes. The parameters are set out in the operational management plan below:

Site Management Plan

- 7.11 The combined site would operate under a Site Management Plan. It is intended that the site will be utilised as follows:
- a) Rowley Mills will focus on production activity, operating within the existing broad industrial use class, focussing on manufacturing uses and with a broad opening allowance to facilitate late night / 24 hour working, as required, to fulfil contracts. The expansion of Rowley Mills is to facilitate a more efficient layout, introduce more automation and new process capabilities, and to create more space to support wellbeing, storage and more project-based working more space to support the customer visit experience and employee welfare facilities.
 - b) International House will provide a new product development and introduction facility- which will cover design, R&D, product testing and process development elements for new projects. This will involve lighter manufacturing for prototyping

and pre-production activity. This will use similar machines to those used over the road in the production facility at Rowley Mills, but not operating at the same capacity. This NPD facility will form a separate part of the business.

- 7.12 This will ensure that both sites, whilst part of the same business, can operate without the need for regular or numerous vehicle movements between the two sites- for example moving product, raw materials or other process related components between the sites by vehicle.
- 7.13 The key concern raised during the pre-app stage was around HGV movements between sites, due to the potential to block the busy A629. This separation of business parts will ensure that such movements are kept to a minimum.
- 7.14 Access to both of the sites will remain as existing, from the A629 Penistone Road. The operation of the two sites will be as separate, standalone parts of the Reliance operation.
- 7.15 The proposed uses of the International House site are “light industrial” and / or ancillary office elements, along with a range of Class E(g) commercial uses that will not require access for any vehicles larger than a refuse vehicle. Swept path analysis of the International House site by a refuse vehicle is provided in the Transport Statement Appendices.
- 7.16 Whilst movement between the sites will not normally be required, there is potential that a particular machine or larger component may need to transfer between the sites. Any movements that might be required would be managed under a separate management plan. This would aim to control the movement of equipment / machines / product between the two sites, to limit this to non-peak times with (if needed) “escort” or “banksman” type support to control traffic flows during the “abnormal movement”. This could be conditioned to ensure it is employed for the duration of the combined operation.

Noise

- 7.17 The noise assessment shows that the proposed development will generate low levels of sound impact at the nearest residential receptors during the daytime.
- 7.18 However, depending on the activities undertaken within the range of operations currently permitted at the Rowley Mills site, there is potential for night time operations reach the threshold of adverse impact. Noise from the new extensions will generate a noise impact of no more than -4 dB at night time, so this is not significant in its own right. In addition, following the agent of change principle, the adjacent residential development to the north is providing mitigation to accommodate permitted noise from the Reliance site. This will be effective in mitigating any effects that could arise from the wider operation.
- 7.19 The report concludes that noise effects from the proposed extensions will be negligible.

Air Quality

- 7.20 The application is accompanied by an air quality assessment. The site is not in an AQMA, with the nearest being Kirklees AQMA 9 in the town centre. Monitoring data in the vicinity of

the site suggests that levels are well below target thresholds, and there is a decreasing trend.

- 7.21 The level of traffic generated by this proposal will be very low and the development is not expected to have a meaningful effect on air quality. However, mitigation will be provided in the form of travel planning, the provision of Electric Vehicle (EV) charging points, and provisions to encourage cycling and walking to work.
- 7.22 The construction stage will generate dust and other particulates, during both demolition and construction activities. This will be mitigated through standard construction management practices and can be controlled through a CEMP, which can be conditioned.
- 7.23 Air quality effects are therefore considered to be 'not significant'.

Ground conditions

- 7.24 A desktop ground conditions assessment is provided with this submission. This focusses on Rowley Mills, as the works at International House are not significant and expected to utilise existing structures to enable the extensions. There is, therefore, limited potential to mobilise contaminants to the water environment or future site users.
- 7.25 The Rowley Mills site is underlain by shallow rock, although there is potential made ground at the eastern boundary. There is no evidence of shallow mining or quarrying. Cutting into the slope at the rear (east) of the site may need retaining structures. No radon protection is needed, and the only ground water abstractions nearby are operated by Reliance for evaporative cooling and process water.
- 7.26 The development will take place on previously developed land which has been used for industrial purposes. The end use is not sensitive, and the approach to any contamination is likely to be to remove or seal any contaminants found under the site, in areas where they will not be disturbed.
- 7.27 Current information suggests that ground conditions are not a factor that weighs against this proposal and that a suitable solution can be found to the ground issues which resulted in the residential proposal not being viable on this site.

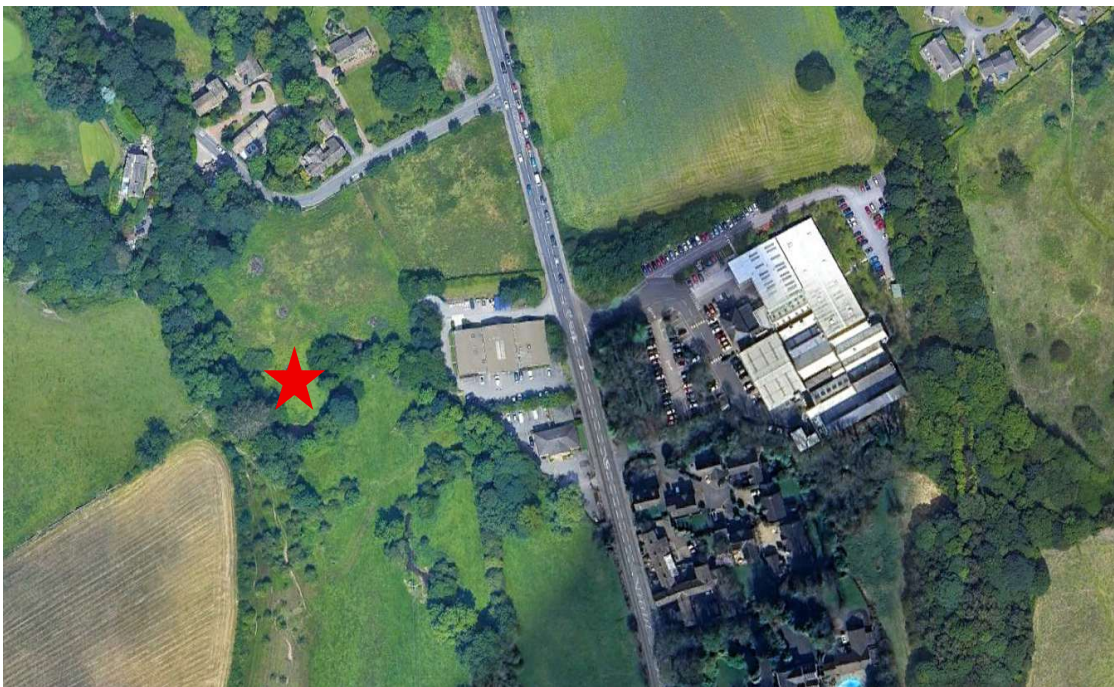
Ecology

- 7.28 We have provided a PEA report and BNG assessment with this application. This notes that there are a number of local bat records and that the habitat on site ranges between good and poor. The report includes a review of the buildings. It concludes that:

"bat species are highly unlikely to rely on the site for feeding but may occur in the local area. Roosting by bats will not occur on the site."
- 7.29 The report recommends that new planting, lighting design and the provision of bat boxes would offer suitable mitigation and that:

"...there will be no adverse impact on the favourable conservation status of bats affected by the proposal".

- 7.30 In addition, the PEA suggests some precautionary mitigation measures for Water Vole, Otter, Birds, Badgers and Amphibians, albeit that none were found on site. The woodland to the front (west) and side (north) of the site is poor quality, having a uniform age with a poor understorey. The woodland to the south and east has more diversity, but still has limited ground flora.
- 7.31 A BNG report has also been prepared, which finds that a -5.09% change would be achieved following development. However, a +10% change can be achieved through new planting on land controlled by Reliance adjacent to the site boundary. Reliance control considerable land around the site, and it is expected that habitat enhancement in those areas would result in the enhancement target being exceeded.
- 7.32 This would require additional “urban tree” habitat to be created, and it is envisaged that these will be provided in the general area indicated by the red star below.



- 7.33 This would be controlled by the standard BNG condition the requires the detail of the uplift scheme to be agreed and provided.

Trees

- 7.34 A tree survey has been completed. The majority of the trees will be retained and part of the The ecology work suggests enhancing areas of woodland to the site’s eastern and northern boundaries.
- 7.35 There is an area of TPO (55/80/a1) to the south of Rowley Mills, as indicated by the green area below:



7.36 None of the TPO trees will be affected by the development proposal- however, some works were undertaken recently for arboricultural reasons, and were authorised under a separate application.

7.37 There will be a loss of some trees, in G13 to the rear of the mill building, where the rear extension will be located. There will also be a loss within the site at G5. However, all of the trees within the TPO and at the sites northern boundary will be retained and the retained planting at the western boundary will be enhanced.

7.38 These trees are set within the site and the retention and enhancement of boundary planting will mean that their removal doesn't adversely affect public amenity, wildlife connectivity or the general green infrastructure network. The loss will be compensated within the site, through the enhanced quality of the existing woodland for biodiversity purposes. Protective fencing will be erected round those trees that are being retained and are likely to be affected by development.

7.39 A number of trees will be planted to mitigate those removed for the development. In particular, enhanced tree planting will be provided around the site boundaries where tree cover is currently weak, as well as between the units and along the new access road.

Landscape

7.40 The application is accompanied by a Landscape Strategy document, which sets out the key principles that have been adopted to enhance the landscape contribution of this site.

7.41 The Landscape Strategy sets out the following key principles:

- Creating a defined internal landscape throughout the development, adding structural height and cohesive planting, including additional street trees and native scrub planting

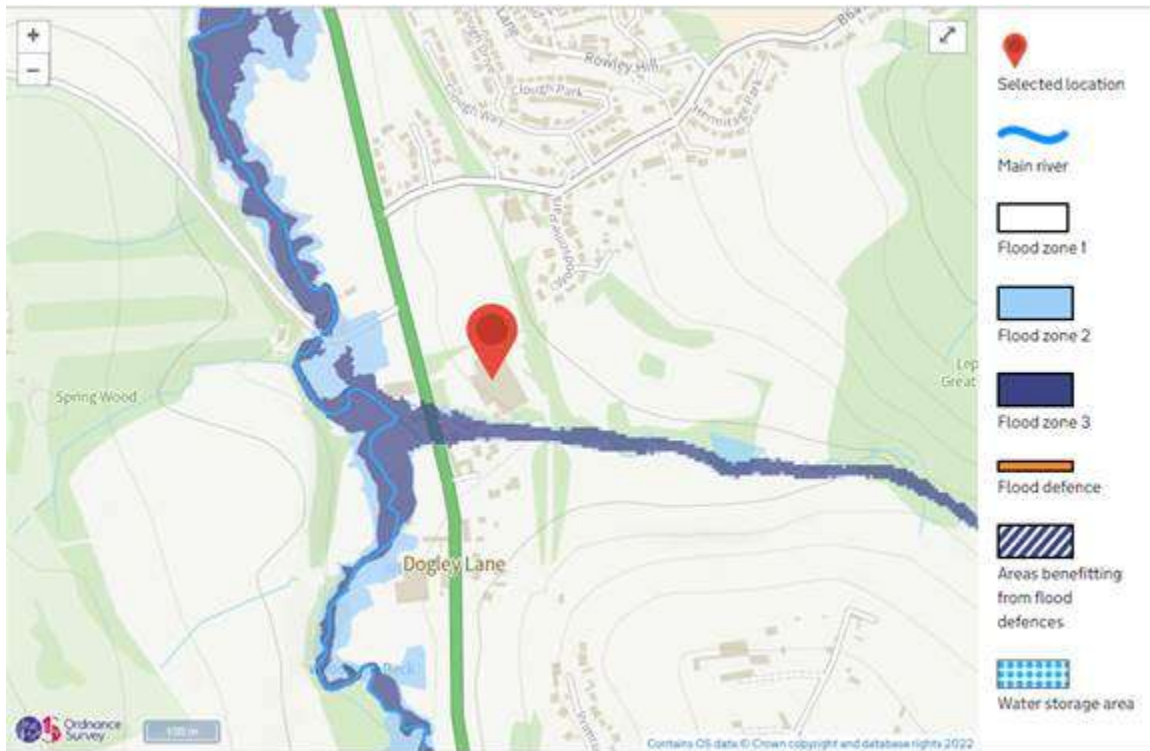
- Improving the ecological value of the core of the site, utilising wildlife-friendly semi-native shrub planting and areas of native meadow seeding
- Removing invasive species, including Cotoneaster
- Replacing low quality existing amenity shrub planting, with more wildlife-friendly semi-native shrub planting to create a more cohesive and attractive green frontage to the building, and complement enhanced boundary planting
- Strengthen and diversify the existing green infrastructure along the site boundaries to maintain ecological networks and habitat corridors.
- Introduce additional woodland understorey planting to the existing higher-quality broad leaf woodland and lower-quality plantation woodland at Rowley Mills
- Targeted infilling of gaps with native tree planting
- Retaining and protecting existing TPO trees

7.42 It is considered that the development will not have any significant visual or landscape character effects and that planting can both enhance biodiversity value and protect amenity.

Flood Risk and Drainage

7.43 A Flood Risk Assessment and Drainage Strategy report accompanies this application, although it only focusses on the Rowley Mills part of the site. The International House area was subject to a separate planning application which considered that site in detail and addressed the drainage and flooding concerns in that area. The work which accompanied that planning application has been duplicated with this submission, and that is relied on for this application.

7.44 A small area of the Rowley Mills site lies in Flood Zones 2 and 3, as shown below:



7.45 Most of the Rowley Mills site is in Zone 1, and the proposed extensions are all in Zone 1. The drainage strategy is to improve flood risk through additional attenuation tanks, to be provided under the yard / parking areas which will attenuate new flows to mitigate harm and reduce risks off site.

7.46 The International House part of the site has an area in Flood Zone 3, but the majority of the site and building are in Zone 1. This proposal, like the previously approved application, will not see any new impermeable area. The proposed development mirrors that already approved under the extant permission, and new development would be at first floor level.

7.47 The flood risk assessment and sequential approach approved for International House the Paxman application would be mirrored in this application. The building floor level (85.74m AOD) is well above the extreme flood level (84.349 AOD) and so the building will not flood. This previous solution was found to be acceptable and allowed for a climate change uplift as the 1 in 100 year level + 20% uplift would see flood water getting to 83.925m AOD.

7.48 In terms of the sequential test, the International House permission was approved on the basis that a pragmatic approach should be taken, in line with PPG advice, where extensions to businesses are considered. This suggests that it might be impractical to consider alternative locations for a single business to be located on two separate sites. It states²⁶ that:

“...a pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location.”

²⁶ PPG on Flood Risk and Climate Change, Paragraph: 027 Reference ID: 7-027-20220825

7.49 The delegated report for that permission confirmed that there would be safe access and egress from the building, within zone 1, and that:

“...not having the extensions to this existing building would require the whole business to relocate which is impractical for a number of reasons. These include, this being a family business in which has always run in Huddersfield, the company also having business link to Huddersfield University, the size of the building allows for the manufacturing and administrative care to be all under one roof and lastly it not being practical or viable to split the business into separation buildings/locations.”

7.50 The same considerations apply to this application. Reliance has been located at Rowley Mills for at least 40 years, and has struggled to find a suitable alternative site to meet the growing needs of their business. This is discussed in detail earlier in this statement.

Sustainability

7.51 The proposed development will comply with both building regulations and local policy requirements. It will exceed the required carbon dioxide reductions and will achieve this through high fabric performance and the inclusion of solar PV to generate zero carbon energy and air source heat pumps, to provide heating and hot water needs.

7.52 For the extension and initial refurbishment at Rowley Mills, it is likely the scheme will utilise existing systems where possible, and any new systems will be expected to be electric only. The International House scheme will be registered under the new approved Document L of the Building Regulations 2021, which has been updated following the issue of the Kirklees Council climate change guidance in 2019. The use of all electric solutions is now encouraged to achieve carbon reduction targets for building regulation compliance.

7.53 The development will also reduce carbon through the following means:

- Building fabric elements and glazing specifications improved over and above Building Regulation requirements;
- Maximise the use of natural daylight within the occupied areas, to reduce energy use associated with artificial lighting;
- Reduced air permeability to reduce energy demand;
- Electric vehicle charging points;
- Energy efficient lighting and controls throughout the development;
- Water efficient sanitary fittings;
- Sustainable and responsible sourcing of materials.

7.54 It is concluded that the building will exceed the required sustainability standards.

Consultation Feedback

- 7.55 The application proposals were subject to Public Consultation in November 2024. The consultation included:
- Direct contact with key stakeholders, including Local councillors, key Cabinet Members and MP.
 - Contact with neighbouring businesses and residents.
 - Distribution of a flyer to around 4,000 local residents close to the site.
 - Exhibition held on the 19th of November at St John's Church, Green Balk Ln, Lepton - Attended by around 30 people.
- 7.56 The results of the consultation exercise are provided in the SCI. Feedback from the consultation event was overwhelmingly supportive, with residents welcoming the investment, new jobs, and continued success of Reliance Precision.
- 7.57 The points issues raised included:
- A desire to see a speed reduction on Penistone Road
 - Welcomed opportunities to enhance sustainability measures, including solar PV
 - Welcomed the approach to consultation
 - Pleased to see a local business flourishing
- 7.58 There were no actionable objections raised by members of the public.

Material Considerations Overview

- 7.59 A series of technical reports have been prepared to support the application.
- 7.60 This technical work shows that the effects of the application will be acceptable, following any necessary mitigation. This suggests that there are no material considerations which might outweigh the presumption in favour of the Development Plan.

8. Planning Balance

- 8.1 This statement has considered the relevant policy and practical issues resulting from the proposed development. It has found that the proposed development accords with the provisions of the adopted and emerging Development Plan. It has also found a number of benefits that weigh in favour of granting permission.
- 8.2 The principle of the development is considered to be acceptable. Whilst there is a policy conflict inherent in the Local Plan, it is clear that this proposal accords with the objectives of the employment designation, and that policy change means that the site and development can now be considered to be “Grey Belt”- As such, it is an appropriate development in the Green Belt.
- 8.3 As this application is of fundamental importance to the success of an important local advanced manufacturing business, the applicant is keen to ensure that planning permission is granted. They, therefore, set out a suite of measures which they consider comprise the very special circumstances that are needed to justify approving planning permission should the Council disagree with their Grey Belt analysis.
- 8.4 This application makes best use of a previously developed site, will deliver significant socio-economic benefits, will enhance the environmental performance of both the sites and buildings. Most importantly, it will secure an important local business in Kirklees.
- 8.5 The application doesn’t fully accord with the Development Plan as there is an inherent conflict in the designations on this site. In these circumstances, it is necessary to consider what is the most important policy priority. It is concluded that the Green Belt cannot be considered to override the economic importance of this proposal- The site is already densely developed, and serves no meaningful purpose in keeping the site “permanently open”. Refusing this proposal would result in very significant socio-economic impacts on the local economy. It is concluded that it would be irrational to refuse this application on the basis of the site’s inclusion in the Green Belt.
- 8.6 Major benefits have been identified that weigh significantly in favour of approving the application.
- 8.7 We consider that the presumption in favour of sustainable development applies in this case and, in line with NPPF 11c) and Policy LP1, we conclude that planning permission should be granted “*without delay*”.
- 8.8 No material considerations have been identified that suggest refusal, and we have identified a number of material benefits that suggest that the balance lies in favour of granting this application.
- 8.9 We, therefore, suggest that planning permission for this important economic development should be granted.

