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Planning Development

Planning Policy Supporting Statement

Longley Farm, Longley Lane, Holmfirth, HD9 2JD

Introduction

Longley Farm is an award-winning ¹ independent family business operated by the Dickinson family, producing a wide range of dairy products enjoyed by people throughout Yorkshire and around the world. The dairy has been in operation since 1948, and the site is used for the production and packing of all their products. The wider site comprises of a number of buildings used in the production and packing processes, plus staff car parking and ancillary office accommodation.



Longley Farm Site

¹ Including Rural Business Award winners at the Yorkshire Post Rural Awards 2024

Background to the Longley Farm business

The founders of Longley Farm, Joseph and Edgar Dickinson, started the business in the late 1940s with 30 acres of land specialising in farm-bottled tuberculosis-free milk. By 1954 when rationing ended, J&E Dickinson started to sell cream to a market that had been closed for fifteen years.

The sales were highly successful and by the late 1960s, we were one of the first dairies to make yoghurt. Jimmy Dickinson, who took over management in the mid-90s, talks about Longley Farm's famous cottage cheese and how it came into production.

“Around 1970, my father, who had been in the Pacific Campaign with the Royal Navy and had spent time with the American fleet, had been inspired by having seen cottage cheese on board their ships. He subsequently visited America a couple of times and took the plunge to become the first in the UK to make cottage cheese commercially.”

The key focus of this application relates to the need to accommodate more reliable and increased production of cottage cheese. Cottage cheese is one of the purest forms of protein-based foods available. Over fifty years of experience have gone into making Longley Farm cottage cheese such a national favourite.

The current cottage cheese vats are very elderly and in need of replacement. They cannot cope with the demands being put on them, either in terms of capacity or reliability. It is not possible to replace the vats in their current location whilst continuing with production. Not only do the vats themselves need replacing, but the concrete floor under the vats also needs to be replaced. Stopping production is not an option and so the replacements must be located in a new area which is alongside.

The business owns and manages 930 acres of land for dairy farming at Longley Farm and Tyers Hall Farm near Barnsley, thereby supplying milk directly to the Longley Farm factory for its various dairy products. Longley Farm also buys all milk produced from 29 local farms, with just under half of the milk taken from Pedigree Jersey herds.

Longley Farm has considerable expertise in producing high-protein dairy products and it is increased demand for such high protein that has resulted in a recent social media (TikTok) phenomenon whereby the demand for cottage cheese has exploded, because consumers are looking to increase their uptake of protein in their diet and cottage cheese is one of the purest forms of protein-based foods available, particularly the fat-free variety which is 100% protein-based. Dairy protein is judged to be an 'easy win' in this regard. There are currently 96.2 million posts on the 'Cottage Cheese' TikTok web page.

Site Description

The site of the application is located in the southern section of the site which comprises a cluster of stone-built buildings / extensions used in the production of cottage cheese. Longley Lane is located to the north-west and west of these buildings with Dunford Road located to the south-east and east. A pond is situated directly to the east of these buildings with a row of residential terraced cottages located to the west.

The site is situated in a rural location surrounded by open fields and countryside. The nearest settlement of Hade Edge lies 500m to the south, while the town of Holmfirth is 1.6 miles to the north.

The Proposals

This application seeks planning permission for the erection of an extension to the production area, specifically for increasing Longley Farm's cottage cheese production in response to significant increased demand.

The proposed extension would project from the existing south-eastern elevation. The extension would measure 25m x 31.9m and have a varied height through a mono-pitch roof of between 7.8m and 8.5m x 6.5m. The ground floor would accommodate 6 no. new cottage cheese production vats to replace three existing cottage cheese vats that are nearing the end of their economic life (784 sq.m GEA)

A mezzanine floor (457 sq.m GEA) above part of the extension's ground floor would incorporate production gantries and new office / meeting room accommodation – allowing re-location of office space to enable the necessary expansion of laboratory testing facilities. The extension would be constructed using matching stone and timber cladding with a gently sloping extensive green roof. Windows are proposed on all elevations.

The materials of construction would comprise:

- Dam wall and landscaping retaining walls faced in coursed dry bed walling buff coloured stone (Johnsons Wellfield)
- Cut stone plinths, string courses lintels and jambs in Johnsons Wellfield buff coloured stone
- Proposed cottage cheese extension masonry cavity walls with external skin of coursed natural stone - new/reclaimed punched face walling (Traditional Stone, Wakefield)
- Cedar / larch rainscreen cladding vertically orientated random widths
- Continuous/frameless aluminium louvres (grey)
- Colour coated steel cladding with standing seams (zinc/copper effect) on insulated Kingspan Karrier panel or similar
- Double glazed aluminium windows and curtain walling with coloured spandrel panels
- Aluminium/glazed doors
- Colour coated steel security Doors
- Colour coated steel roller shutters
- Standing seam aluminium composite cladding roofing (mid grey) with solar photovoltaic panels
- Composite cladding roofing with membrane water proofing below extensive green roof build up (Sedum blanket roll). Aluminium cappings and flashing.
- External steel columns supporting new roofs over existing Dairy. Timber cladding to siffs of oversailing eaves.
- Roof handrails to allow safer access for roof maintenance which need yearly inspections and that doesn't rely on systems / harnesses.
- Maintenance track and level apron to be formed in TE heavy duty cell permeable paving with seeded meadow top soil
- Walkway around pond finished in York stone flags

The proposals also include a new access track looping around the eastern side of the pond from the entrance road to the proposed extension. The purpose of this is to allow individual cottage cheese vats to be replaced in future as they reach the end of their useful life. These vats (akin to 'cartridges') would be slid in and out of the eastern elevation of the proposed extension in future. Given their size, this would require specific access for heavy goods vehicles to enable transport of these individual vats.

Finally, the proposed works also include the following:

- Reduction of pond area (part retrospective) ** and rebuilding of retaining walls in stone, in order to accommodate room for the extension.
- New water tanks x 4 immediately adjacent to the southern elevation of the extension.
- Replacement and raising of roof structures above existing production areas and offices by between 1.2m and 3m.
- Soft landscaping to improve the visual amenity and ecological value of the site.

The new roof is needed not only because of the age and poor condition of the roof cladding, but also because restricted height is preventing the installation of new equipment and limiting production. Re-roofing also gives the opportunity to further reduce energy use, with improved thermal insulation and the introduction of solar panels.

** NOTE: The pond itself however would be improved in terms of its ecological value through, for example, regrading of the pond edge to incorporate a shallow ramped area for pond animal / invertebrate species to safely enter and exit the pond; planting of wetland trees & shrubs, and marginal trees & shrubs; the creation of a floating pontoon of vegetation to allow ducklings and small mammals to shelter from prey; and a wading pool at the edge of the pond will allow birds and mammals to easily access the pond and provide a shelter habitat for breeding

Planning History

The following applications relate to proposals within the red line boundary only and do not include the whole of the Longley Farm site:

89/02723 – Proposed mono-pitch roof over new box store floor - Approved

92/03642 – Extension of existing staircase up to existing 2nd floor - Approved

92/05017 – Erection of covered link - Approved

93/01135 – Erection of 1st floor extension - Approved

98/92076 – Erection of conservatory extension - Approved

99/92762 – Alterations to raise height of roof – Approved

Local Plan Designation

The application site is located within the Green Belt in the Kirklees Local Plan. The site is also within the Holme Valley Neighbourhood Development Plan area.

Pre-application Engagement

Holme Valley South Ward Councillors, the Leader of the Council (Cllr Pattison), the Cabinet Member for Finance & Regeneration (Cllr Turner) have been consulted on the proposals in early September 2025 (see leaflet produced for consultation at Appendix 1).

The majority of those contacted responded and all feedback has been very positive. Some Councillors also suggested that the applicants engage with the Local Planning Authority in pre-application discussions.

All three Holme Valley South ward Councillors responded with support, while one also responded positively directly to the LPA through the pre-application process (as reported in the Council's pre-application response).

As such, in accordance with the recommendations of Councillors and the advice in NPPF paragraphs 40 to 43, the applicants engaged in pre-application discussions with the Council under reference: 2025/20950 in late September 2025. A site meeting with a Kirklees planning officer subsequently took place at the Longley Farm site in October to discuss the proposals.

A formal written response was received on 9th January 2026 and the following sections of this report address all relevant planning matters.

Validation Requirements

In accordance with NPPF paragraph 45, the applicants have reviewed the Council's Validation Checklist and have provided the relevant technical reports to accompany the planning application.

The application is accompanied by the following plans and reports:

- 1) Project Plans x 14 - Holme Architecture Ltd
- 2) Landscape Drawings x 7 - Xanthe Quayle Landscape Architects
- 3) Planning Policy Supporting Statement – Robert Halstead Chartered Surveyors & Town Planners
- 4) Design and Access Statement – Holme Architecture Ltd
- 5) Design and Access Statement Addendum (Landscape Matters) – Xanthe Quayle Landscape Architects
- 6) Tree Report and AIA – JCA Ltd
- 7) Transport Statement / Travel Plan and Appendices – Longley Farm / Holme Architecture Ltd
- 8) Phase I Land Contamination Report – RGS Ltd
- 9) Phase II Land Contamination Report - RGS Ltd
- 10) Coal Mining Risk Assessment – RGS Ltd
- 11) Amphibian Survey & Report – JCA Ltd
- 12) Bat Emergence Survey & Report – JCA Ltd
- 13) Biodiversity Net Gain Assessment Feasibility Stage – Ecus Ltd
- 14) Biodiversity Accounting Assessment Report – JCA Ltd
- 15) Ecological Impact Assessment - JCA Ltd
- 16) Surface Water Drainage Assessment – KRS Enviro Ltd
- 17) Flood Risk Assessment - KRS Enviro Ltd
- 18) Preliminary Ecological Appraisal with Preliminary Roost Assessment – Ecus Ltd
- 19) Statutory Biodiversity Metric Condition Assessments
- 20) Climate Change Statement – Holme Architecture Ltd

Other reports were requested, however these have been judged not to be reasonably necessary as follows:

- 1) **Noise Impact Assessment** – the agent for the application has assessed the proposals in relation to noise in conjunction with speaking to a noise consultant. A noise report is not considered to be necessary in this case because (a) the existing and proposed noise levels are not generally audible externally due the nature of the manufacturing processes; (b) there are no existing issues in relation to noise and nearby residential properties, and the manufacturing process will not change in terms of noise types or levels as a result of these proposals; and (c) the proposed eastern projecting extension will be further away from existing residential

properties, which are situated 70 metres to the west, on the other side of the factory complex. No other residential properties are nearby (i.e. ones to the north-east are 250m + away and one to the south is 125m+ away).

- 2) **Water quality/water framework directive assessment** - the applicant's Drainage Engineer does not consider this is necessary given that the proposals are just for an extension to an existing building and there will be no change in the operations undertaken at the site. Water quality is discussed in the submitted drainage report.
- 3) **Ecological Design Strategy** – the pre-application response agrees this can be conditioned in the event the LPA are minded to grant planning permission
- 4) **Main Town Centre Uses Sequential Assessment** - the office space would be considered ancillary to the principal manufacturing use of the site, and as detailed below would only increase by 0.24% (30 sq.m) as a result of this application.
- 5) **Site Waste Management Plan** – It is considered that this should be capable of being conditioned in the event the LPA are minded to grant planning permission.

Assessment of the Proposals

Principle of Development

Through the pre-application enquiry with the Local Planning Authority, the principle of development was discussed where it was concluded by officers that the proposals were likely to be supported in principle, both in relation to the positive business & economic aspects of the case, together with likely support for a 'very special circumstances' case in the Green Belt.

A degree of uncertainty was expressed in relation to whether or not the proposals could be supported in relation to Grey Belt policies in relation to the concept of 'unmet need'. Nevertheless, officers acknowledged that no such case has yet been put forward in Kirklees, given the recent introduction of Grey Belt national planning policy. Notwithstanding this, this statement sets out clear evidence for unmet need and contends that the proposals do indeed represent 'appropriate development' in relation to Grey Belt policies.

Economic Development Factors

Local Plan Policy LP1 ² adopts a positive approach towards sustainable development: "When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework."

The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. ³ Within this concept, Paragraph 8 states, "Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

² Presumption in favour of sustainable development

³ NPPF Paragraph 7

a) **an economic objective** – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure....”

Paragraph 7.12 of the Local Plan states: “The Council's overarching objectives for the economy place significant emphasis on the need to support the growth aspirations of the districts indigenous businesses, as well as securing the inward investment opportunities which are likely to occur during the course of the plan period.”

Paragraph 7.3 goes on to state that, “In meeting these needs the Local Plan must positively respond to identified business needs within the economic markets.”

Policy LP2 (Place shaping) states “All development proposals should seek to build on the strengths, opportunities and help address challenges identified in the Local Plan, in order to protect and enhance the qualities which contribute to the character of these places.”

The relevant sub-area (Kirklees Rural) referred to by LP2 lists various relevant strengths/opportunities for growth to these proposals including:

- Availability of local employment opportunities on existing employment sites, particularly in the Colne Valley, Meltham, Honley and Clayton West / Scissett.
- Holmfirth town centre and District centres at Denby Dale, Kirkburton, Marsden, Meltham, Milnsbridge, Skelmanthorpe and Slaithwaite provide for day-to-day shopping needs, with other local centres.

Paragraph 85 in the NPPF states: ‘Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.’

Local Plan Policy LP8 (safeguarding employment land and premises) seeks to support the retention and re-development of existing employment sites for continued employment purposes.

Paragraph 87 in the NPPF goes on to state, ‘Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.’

In terms of rural economic development policy support:

- Paragraph 88 in the NPPF states: ‘Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings.’
- Paragraph 7.31 in the Local Plan states:

‘The rural economy plays an important role in the wider economy of Kirklees. In particular the smaller settlements in the south of Kirklees are home to a range of

employment opportunities. The characteristics of this economy are diverse, covering both smaller urban and Green Belt areas, and supports innumerable businesses. It is therefore important to continue to support and encourage the sustainable growth of these industries to maintain and enhance the opportunities for locally supplied employment.'

- Paragraph 7.33 in the Local Plan goes on to state:

'In Green Belt locations, while national guidance states that the countryside should be protected for its own sake, this should not mean that businesses within it cannot thrive. Carefully designed and sited development to support existing businesses can maintain the economy, provide local jobs and help to support communities.'

- Paragraph 89 states: 'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport'
- Policy LP10 (Supporting the rural economy) states that "the economic performance of the rural economy will be improved by:
 - b. supporting the needs of small and medium sized enterprises;
 - c. increasing local employment opportunities;
- Policy 7 of the Holme Valley Neighbourhood Development Plan states that "proposals will be supported which result in the creation or sustainable expansion of existing and new businesses." In particular, the sub-text to Policy 7 sets out that: "without economic activity, the whole valley is in danger of becoming a dormitory belt, with very little employment. This could have an effect on the viability of local shops and services with fewer economically active in the valley during the day."

In accordance with the above referenced national, local and Holme Valley NDP policies:

- a) Longley Farm is one of the very few large-scale employers in the Holme Valley, and probably the largest currently in existence. It is therefore extremely important that the business is supported in its needs to *invest, expand & adapt* ⁴ in response to market demand, particularly as increased success will result in more inflow of revenue into the Holme Valley area, maintaining many jobs and supply chains directly and indirectly.
- b) It is of crucial importance to the local economy that the Council (through its planning function in this case) supports the ongoing viability of the Longley Farm business.
- c) Longley Farm itself employs 128 local people full-time, thereby not only being one of the biggest employers in the Huddersfield district, but more crucially, highly important to the local rural economy around the Holme valley.
- d) Longley Farm is of local and regional importance in terms of economic growth and resilience. This scheme represents sustainable development in that the proposals will support the growth aspirations of the districts indigenous businesses, and contribute

⁴ NPPF Para 85

towards a strong, responsive, and competitive local economy, by enabling an established major rural employment site to be expanded to support the continued growth, innovation, and improved productivity of a well-regarded and internationally renowned local manufacturer and innovator – Longley Farm. The proposals specifically cater to their needs in responding to market demand for cottage cheese products and securing their long term future at this site.

- e) The proposals aim to future proof the Longley Farm business (and local farm dairy suppliers) through offering additional and better space for expanded production of cottage cheese.
- f) The specific locational requirements of Longley Farm are to be able to remain on their current rural site in the Holme Valley for the reasons set out in the ‘very special circumstances’ section below. The scheme is beneficial for the applicants, local supplier farms and the rural economy of the Holme Valley area, and it is the specific economic factors that carry very significant, specific, and unique weight in this particular case.
- g) Longley Farm is also a centre of excellence in terms of research and innovation, and is well known for leading the way in dairy innovation. They have pioneered the ability to freeze and unfreeze cream products, enabling export around the world. They were also the first UK producers of crème fraîche and fromage frais.
- h) The plans represent a significant investment for the local area in Kirklees on the part of the owners, and demonstrates a firm commitment to invest in the long-term success of Longley Farm as a widely renowned dairy products manufacturer.

The proposals are also considered to align with the five parts of Policy 7 of the Holme Valley Neighbourhood Development Plan:

- i) The site is acceptable in terms of national Green Belt policy as will be demonstrated below.
- ii) The proposals support the expansion of an existing business.
- iii) The site can be connected to the existing highway network and will not result in severe adverse traffic impacts on surrounding roads.
- iv) The site is large enough to accommodate car parking, service areas and landscaped areas appropriate to the scale of the business (noting that no additional parking areas are required).
- v) The proposals recognise the overall aim to reduce carbon emissions through sustainable design and promoting access by walking, cycling and public transport (see section below regarding sustainable transport, albeit noting that there are no plans to increase employee numbers through this scheme).

With regard to the aforementioned national, local and neighbourhood development plan policies, the proposals are considered to be policy compliant in respect of economic development factors.

Green / Grey Belt Policy

In accordance with pre-application advice received, the LPA were looking for the issue of ‘unmet need’ to be clearly demonstrated in relation to NPPF Paragraph 155 (Grey Belt). The case for the proposals is argued on two grounds in logical order – ‘appropriate development’ under the new Grey Belt policy, or as ‘inappropriate development’ whereby very special circumstances are demonstrated.

Grey Belt

The starting point with any Grey Belt assessment is the NPPF glossary definition which states:

'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'

Addressing each of the relevant points in turn:

- a) *'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land*

The site is a previously developed (brownfield) site and therefore passes this part of the glossary definition.

- b) *that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) in paragraph 143*

Paragraph 143 in the NPPF states:

'Green Belt serves five purposes:

- a) To check the unrestricted sprawl of large built-up areas;*
- b) To prevent neighbouring towns merging into one another;*
- c) To assist in safeguarding the countryside from encroachment;*
- d) To preserve the setting and special character of historic towns; and*
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

Government Guidance 'Green Belt' provides categories of assessment for assessing these purposes and sets out categories: strong, moderate, and weak or none. ⁵

Sites that make a weak or moderate contributions to purposes a, b and d are therefore acceptable (i.e. those that do not 'strongly contribute' to the relevant purposes).

Referring to Purpose A, the application site is not adjacent to a large built-up area ⁶ and therefore makes a 'weak or none' contribution as per the Green Belt Government guidance at Paragraph 005 – i.e. Purpose A is not engaged by this proposal.

⁵ Government Guidance 'Green Belt' Paragraph 005.

⁶ The nearest large built-up area is Holmfirth which is approximately 1.6 miles away.

Hade Edge is closer to the application site (less than half a mile away) is a village, not a 'large built up area'. Government Guidance 'Green Belt' states that in assessing Purpose A, "Villages should not be considered to be large built up areas."⁷

Referring to Purpose B), the application site also makes a 'weak or none' contribution as it does not form a gap between towns (again as per the assessment criteria at Paragraph 005 of the Guidance. Again, it is asserted that Purpose B is not engaged by the current proposals.

Similarly, the application site does not "form part of the setting of a historic town" (as per the Guidance wording) and therefore makes no contribution to Purpose D.

- c) *'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'*

In terms of footnote 7, the application site is not located within any of the following relevant areas / assets listed:

- Habitat sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest
- Local Green Space
- A National Landscape
- A National Park (or within the Broads Authority)
- Heritage Coast
- Irreplaceable habitats
- Designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75)
- Areas at risk of flooding or coastal change

It is therefore concluded that the site falls within the NPPF definition of 'Grey Belt'.

Turning then to Paragraph 155 in the NPPF:

'The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

- a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. *There is a demonstrable unmet need for the type of development proposed;*
- c. *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. *Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.'*

The development in this case is for *commercial* development and therefore falls within the ambit of Paragraph 155.

Referring to **155(a)**, the application site currently comprises a large factory within its own grounds. The proposed development would be constructed within the existing site boundary and directly adjacent

⁷ Paragraph 005

to the existing built development. The proposals would also be mitigated by soft landscaping and wildlife-enabling changes to the pond.

It is also important to note from Paragraph 014 of the Government's Guidance 'Green Belt' that:

...if development is considered to be not inappropriate development on previously development land or grey belt land, then it is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.

This is consistent with rulings from the courts on these matters that, where development (of any kind, now including development on grey belt or previously developed land) is not considered to be inappropriate in the Green Belt, it follows that the test of impacts to openness or to Green Belt purposes are addressed⁸ and that therefore a proposal does not have to be justified by "very special circumstances".

As a result, the proposals are not considered to conflict with Purpose C of paragraph 143 – to assist in safeguarding the countryside from encroachment.

The application site is not located within an urban area and therefore Purpose E of paragraph 143 – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land - is not engaged in this case.

The proposals also comply with Green Belt Purposes A, B and D as discussed above.

In summary therefore on Paragraph 155(a), taken together as the policy requires, the proposals *would not fundamentally undermine the purposes of the remaining Green Belt across the area of the plan.*

Referring to **155 (b)** the 'raison d'être' of the proposed development is to meet *unmet need* in the form of a significant surge in demand for Longley Farm made cottage cheese.

Longley Farm has three cottage cheese vats. These vats are running 5 days/week and are considered to be at 100% of capacity. It is important to allow vats to be thoroughly cleaned and rested, to avoid the generation of phage (bacteria eating viruses) and thermotolerant (heat resistant) bacteria. For this reason, additional batches at weekends are only added in exceptional circumstances.

Current production levels are far from sufficient to satisfy the quantities that customers have requested.

A system of rationing has therefore had to be introduced. Priority is given to independent shops and to export. In order to avoid disappointing domestic customers by not fulfilling their orders, Longley Farm have been obliged to impose volume restrictions to national supermarket chains.

Enquiries from UK supermarkets which have been turned down , come to a total unmet need of 115 tonnes per week.

Despite the decision to limit the number of stores supplied , Longley Farm has not been able to fulfil the growing level of orders from those stores that it has elected to supply.

⁸ Our emphasis

As illustrated at Appendix 3 to this Planning Statement, demand has averaged 117 tonnes per week in 2025, but the supply is only 75 tonnes per week, leaving a shortfall of 42 tonnes per week.

Given the limits imposed by the size of the local milk field, the area of the site footprint and the desire to run at a human scale, Longley Farm is not aiming to fulfil all the unmet need.

The shortfall in domestic production is being filled in large part by imports, which is clearly not ideal – i.e. the fact that so much of the shortfall is being made up by imports shows the scope for an increase in domestic production, which will be beneficial to the UK economy.

All UK production capacity is currently running flat out. Clearly, it is likely that new production equipment will be installed in UK, but the time delay involved between ordering and commissioning new equipment is at least 2 years.

According to AHDB, in the year to June 2025, UK retail consumption grew by about 30%. This trend has not abated and in the year 2025, Grahams of Scotland reported a growth in their sales of 52%.

<https://ahdb.org.uk/news/brits-are-crazy-for-cottage-cheese-will-the-trend-last>

<https://irish.qualityfoodawards.com/IQFDA2025/en/node/newsarticle-graham-s-family-dairy-scales-up-national-listings-as-cottage-cheese-and-gold-milk-sales-surge?type=NewsArticle#:~:text=Graham's%20Family%20Dairy%20scales%20up,appetite%20for%20traditional%20dairy%20lines.>

The current strategy is for Longley Farm to maintain its position at the top end of the market for quality and increase sales by about one third. Looking at reports of growth during 2025 of 30 – 50%, this seems to be a very conservative level of increase for Longley Farm.

Finally, a further important consideration to the current situation is that the ‘unmet need’ matter can only get worse should these proposals not ahead because the existing vats cannot be replaced in situ. As such, if the new extension is not built, the existing vats will collapse and cottage cheese production would need to cease. This would make the ‘unmet need’ situation considerably worse.

The proposed development therefore complies with Paragraph 155 point b.

Regarding **155 (c)**, the application site is located 1.6 miles away from Holmfirth which is a 5-minute drive or a 35-minute walk, and less than half a mile away from Hade Edge which is a 1-minute drive or a 10-minute walk.

Hade Edge includes a primary school, two shops, two hairdressers and a pub / restaurant, and Holmfirth, being the main town for the area, contains all relevant shops, services, and community facilities.

Public transport is available in the vicinity of the site:

- The most frequent service (310) operates at the junction of Dunford Road and Cross Gate Road – 0.5 miles away (10 min walk). This is an hourly service running between Huddersfield, Holmfirth and Scholes / Hepworth, and operates between 05:40 and 23:50 hours daily (slightly later start and earlier finish on Sundays)

- Services 25a, 29 and 87 immediately adjacent to the site entrance on Dunford Road (Sheffield – Holmfirth; Penistone – Holmfirth; Holmfirth - Castleton) provide a limited service on various days Monday to Friday,

Public transport therefore offers a realistic alternative to private car travel for employees and visitors.

The proposal site also provides immediate proximity to a wide and useful network of public footpaths and bridleways, which help encourage walking and cycling.

Paragraph 110 in the NPPF states that “Opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

As the enclosed Transport Statement details:

- Longley Farm prioritises local recruitment, advertising roles through local platforms first to attract candidates from nearby areas. This helps reduce the need for long commutes and naturally encourages sustainable commuting by foot, reducing reliance on private car travel.
- Longley Farm owns residential properties close to the workplace, which enables some employees to walk to work.
- Cycling Facilities – Shower and storage facilities are provided to support those who cycle to work and to encourage cycling as a primary mode of transport.
- Car sharing is encouraged where practical, particularly among staff who live in nearby areas or follow similar routes.

Overall, the proposals are therefore considered to comply with point c (sustainable location), particularly given the NPPF policy requirement for flexibility for rural areas.

Paragraph **155 (d)** relates to major *housing* planning applications and is therefore not applicable in this case.

Through the pre-application enquiry, the Council was satisfied that the proposals could comply with all criteria other than in relation to unmet need, which was requested to be evidenced further.

Given that the issue of unmet need has now been fully addressed, the proposed development is therefore considered to be appropriate development in the Green Belt in principle, in accordance with Paragraph 155 in the NPPF.

As such, should the LPA agree the site comprises Grey Belt and passes the relevant tests in Paragraph 155, there will be no requirement to assess the next section.

Very Special Circumstances

In the event that the submissions in relation to Grey Belt policy compliance are not accepted, the applicant puts forward very special circumstances as set out below.

NPPF Paragraph 153 states:

'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. '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 considerations.'

The very special circumstances in this case area as follows.

- 1) The Longley Farm manufacturing business has evolved entirely on the present-day site. The manufacturing chain comprising the supply of raw materials, the production lines, and then the packaging lines (together with all the other necessary ancillary activities - testing labs, administration offices etc). They are all entirely intertwined and cannot be separated or disaggregated elsewhere. The manufacturing equipment is bespoke and generally on a large scale, so to move this equipment alone would be extremely cost prohibitive, to the point of being wholly unviable for the business.
- 2) The proposals provide a number of significant business operational benefits:
 - a) The cottage cheese production line is currently situated at the south-eastern end of the complex. The location of the extension is therefore necessary to minimise disruption to this production line as a whole.
 - b) The proposal will enable increased production, by replacing three cottage cheese vats with six new ones of better quality and design. The building housing the current cottage cheese vats was put up in the 1970s and was built to the standards of the time. The flooring around the cottage cheese vats is slowly failing, increasingly risking the ability of the cottage cheese vats resting on this floor to continue operating. New replacement vats cannot be installed in this area and so the proposed new vats need to be located within a purpose-built extension. This will then enable the floor around the existing vats to be vacated, repaired and re-purposed.
 - c) The vats themselves (which need to be a specific shape and size to achieve the required curd quality and consistency) are also old and at the end of their economic life. They are at full capacity, meaning that any failure of one or more of the vats, puts the cottage cheese production line in serious jeopardy.
 - d) Spare capacity will be secured (which currently does not exist) in the event of a vat failure. The new facilities will enable production to occur on rotation, thereby allowing two vats to be 'rested' in between production cycles. This will enable Longley Farm to produce a consistent and reliable supply of cottage cheese, as well as a minimum 33% increase in supply above current levels.
 - e) The proposals will provide a dedicated space for the six new cottage cheese vats, also including external access to enable individual vats to be replaced over time when needed - a benefit that again, currently does not exist. This is why the access track is required, to enable HGV's to transport old / broken vats away, and move new vats in.
 - f) The proposed layout will also allow significantly better space between (minimum 1 metre required) and around the vats, as the current vats are too close together and cannot be managed and maintained efficient and effectively.

- g) The anticipated revenues arising from the increase cottage cheese production, will enable Longley Farm to re-invest in the factory as a whole – overdue renovations (leaking roofs, asbestos removal etc), and other improvements such as investing in a new (very expensive) deep freeze facility and upgrading yoghurt production equipment dating from the 1970s - to keep the business on a sustainable footing for the longer term.
- 3) The Longley Farm has a symbiotic relationship with its supplying farms - milk being the overwhelming main raw ingredient for all Longley Farm's dairy products. The business owns and manages 930 acres of land for dairy farming at Longley Farm and Tyers Hall Farm near Barnsley, thereby supplying milk directly to the Longley Farm. Crucially, Longley Farm also buys all the milk produced from 29 local farms at a sustainable price, enabling these farms to remain viable. **These farms cannot survive without Longley Farm, and Longley Farm cannot survive without these local farms. The continued success of the Longley Farm business is therefore very important for the local rural economy.**
- 4) The location of the Longley Farm business in its current location south of Holmfirth is critical in terms of its proximity to its supplying local farms. If Longley Farm is unable to expand in its current location, in addition to it not being viable to move the factory in any case, the close geographical ties with these milk suppliers would be at risk. This location also helps mitigate carbon emissions as transport miles are minimised as a result of the suppliers and the factory being in close proximity to one another.⁹
- 5) Although the Council's planning records only extend to recent decades (and no officer's reports are available online), it is clear that the business has been permitted to expand over recent decades by the Council notwithstanding the Green Belt designation. Indeed, it is clear that such extensions have far exceeded the scale of the original buildings for a significant amount of time, and so in essence every application to expand the business would have been contrary to the normal 'extensions' Green Belt policy and represented inappropriate development for which very special circumstances were needed.
- 6) A logical alternative way to look at this case therefore would be to view the current proposals against the scale of the existing buildings now present on the site. Analysed in this way, the proposed extension (at 9.5% additional floor space to the existing buildings) it is not in any way disproportionate to the size/scale of the existing buildings on the site.

Through the pre-application response, the LPA also stated "Officers are fairly comfortable with the very special circumstances outlined however, Officers would seek some further evidence to demonstrate how the manufacturing process is intertwined, and why the cottage cheese element of the scheme physically/financially could not be utilised elsewhere. Additional information should also be provided in relation to how the proposed business expansion would further improve the local economy as it considered that this would form the main crux of the very special circumstances argument."

In response, the applicant provides the following information:

⁹ It is also worth noting in this regard that the dairy farm industry in Kirklees has almost completely collapsed in recent years, and yet as a result of increased demand, one new farm has recently been established and it is hoped that these proposals will help facilitate a further revival in the local dairy farm industry.

a) Further evidence to demonstrate how the manufacturing process is intertwined and why the cottage cheese element of the scheme physically/financially could not be utilised elsewhere

The Design and Access statement regarding LAYOUT (Page 7) explains why the new vats need to be located next to the existing dairy with diagrams. In summary:

- (i) the travel distance of the cooked product leaving the new vats needs to be kept to a minimum to avoid adversely affecting the quality of the product;
- (ii) segregation between existing and new dairy spaces is a key consideration to avoid cross contamination;
- (iii) the other key consideration for the layout is vat delivery, access for future maintenance and eventual replacement. The complexity of services and plant in the existing dairy makes access for such large vats through the existing building impossible, hence a new access track is proposed around the pond from Longley Lane;
- (iv) the installation and commissioning of new equipment is estimated at taking 6 – 12 months. It is not possible to take the existing equipment out of service and replace it, whilst still maintain production. The proposed solution is to upgrade the existing equipment by locating the new equipment alongside the old; and
- (v) the dairy is already extremely cramped and there is no space available for the new equipment. If space were available within the existing buildings, this would have been the selected option.

b) How the proposed business expansion would further improve the local economy

Longley Farm was the first dairy in the United Kingdom to make cottage cheese on a commercial scale. It is the national brand leader and is recognised world-wide for its quality and innovation.

The cottage cheese wins many prizes at shows and is considered by many as being the industry benchmark by which quality is judged. It is on sale throughout the country and can be found in places such as Barbados, Spain, Dubai, Hong Kong and Singapore. Longley Farm introduced cottage cheese into France over 40 years ago and this remains a large market.

The dairy is a centre of excellence in dairy technology and a leader in the manufacture of fresh dairy products. Since it was founded in 1948, there has been a process of continuous improvement and investment. This has brought, and will continue to bring (as a result of these proposals), work to many local suppliers, such as builders, electricians and steel fabricators. The substantial majority of development works has always been undertaken by local contractors and this will continue to be the case with the proposed new development.

This level of excellence allows Longley Farm to pay its local farmers one of the highest milk prices in the country. Currently, the dairy industry is in crisis, with farmers receiving very low returns and many going out of business. Meanwhile, Longley Farm suppliers are receiving a

price which is higher than that received by other comparable farmers. Local dairy farms are viable and developing, whereas those in other areas are struggling.

In large part, Longley Farm's ability to pay a good milk price is based on the cottage cheese business. However, at the core of this business are cheese vats which desperately need to be replaced and upgraded. Taking no action would inevitably lead to mechanical failure, which would have serious knock-on effects not only for the dairy, but also the local farmers, contractors and suppliers.

This proposed new development is a cornerstone of maintaining a flourishing and vibrant local dairy industry.

Finally, the Council queried increasing the building's height in relation to the proposal's harm to the Green Belt. Section 6 of the Design and Access Statement fully explains the scale aspects of the development. However, in summary, Longley Farm has for many years struggled with compromised height within many of its existing Dairy buildings. The original buildings did not have to cater for such a high degree of automation, which now require a significant number of pipes and services. Some attempts have been made to increase height, but these have been small scale and have in turn become cramped. As a result of the restricted height, larger tanks cannot be easily maintained or replaced, and improvements in production layout cannot be achieved.

Given the above, the proposals are considered to represent very special circumstances in the Green Belt, of sufficient weight to clearly outweigh the harm to the Green Belt by reason of inappropriateness.

Green Belt Policy LP57 (c) ¹⁰

The pre-application enquiry response for the Council stated: "Whilst the access track is substantial in length, and visible from public vantage points, as it is to be constructed utilising grass reinforcement mesh, over time this access track should blend in with the landscape and have minimal impact on the openness of the Green Belt. Officers would request that further details and examples of the use of this reinforced mesh elsewhere, be provided within any subsequent application."

In response, photos of the mesh are in the accompanying Landscape Architects D&A addendum. The specific names / locations of projects involving these materials will be provided under separate cover.

Design and Visual Amenity

'Proposals should promote good design by ensuring: a. the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape.'

Paragraph 135 in the NPPF sets out various design objectives, including the need to ensure developments will function well and add to the overall quality of an area, are visually attractive, are sympathetic to local character and establish or maintain a strong sense of place.

The NPPF (para 135) seeks to achieve: "visually attractive as a result of good architecture, layout and appropriate and effective landscaping", and that are "sympathetic to local character and history,

¹⁰ LP57 c. the proposal does not result in a greater impact on openness in terms of the treatment of outdoor areas, including hard standings, curtilages and enclosures and means of access; and

including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.”

Policy 1 of the Holme Valley Neighbourhood Development Plan (HVNDP) also set out various design objectives to protect and enhance landscape character of the Holme Valley.

A Design and Access Statement accompanies the planning application and in summary, the proposed extension seeks to provide a high quality and sustainable design through the following:

- 1) Locating the extension on the eastern side of the site, thereby only being visible from the limited areas of ground above the site, as opposed to across the main valley to the west.
- 2) Use of course natural stone (in keeping with the local area) and timber cladding infill panels.
- 3) A green sedum roof for the extension element, which will benefit wildlife and protect key views across the local landscape by allowing the extension to blend in with its surroundings.
- 4) Layout, form, scale, massing and roof form commensurate with the character and appearance of the existing factory complex.
- 5) Incorporation of an extensive bank of solar panels that will provide significant amounts of renewable energy to help contribute to the factory’s power needs.
- 6) The proposed access track to enable the vats to be renewed in future would be constructed of a green ‘geo-grid’ surface to help it blend in with the existing field, and soften views over it from the surrounding area.

The Council’s pre-application response generally supported the design and materials, stating:

The design and materials are considered to be reflective of the existing buildings, whilst also being sympathetic to other surrounding properties. Whilst more contemporary features are to be added through the use of cedar/larch cladding, steel cladding, aluminium composite cladding and solar panels, these details are considered to be acceptable given their minor nature and therefore the proposals are considered to accord with LP57 (d) of the Kirklees Local Plan.

The pre-application response also stated:

Whilst the extension is large in size, the sloped roof and restricted height does help to ensure that the extension would not appear overly dominant or overbearing, and the design and fenestration of the building appears to remain simple in appearance, with the use of matching materials, these are both welcomed. The location of the extension to the east, does result in it being openly visible from Dunford Road, but the extension will be set against existing building structures which are of a larger scale and size. Therefore, it is likely that the proposed extension would be deemed to be visually acceptable in this location (subject to an assessment being made on the principle of the development within the Green Belt), although concerns exist over the use of timber cladding, that are expanded on below.

In response to the last point, the Design and Access Statement illustrates an example of how a comparable development has aged well over the years.

The pre-application response also stated:

Moving on the proposed installation of access track, given that it is to be constructed utilising a permeable grid system [geo-grid], it is considered that over time this access track will blend into the landscape and therefore, based on the current details held, would likely raise no concerns in respect of visual amenity. However, further details on the permeable grid system to be used should be provided within any subsequent application, alongside examples of how the system appear visually over time, once the grass has been able to grow around/through the membrane, to ensure that this would be a suitable suggestion in this open Green Belt location.

In response, photos of the mesh are in the accompanying Landscape Architects D&A addendum. The specific names / locations of projects involving these materials will be provided under separate cover, as well as details of how these materials age.

The track (and the rest of the meadow) will be grazed but not mown so will be largely invisible as a track.

In relation to the roof raising and sedum coverings proposals, again the pre-application response supported these aspects, stating:

The proposed re-roofing and raising of the existing roof structures is considered to be acceptable, from an urban design and visual amenity perspective, given that the increased roof height still includes low level mono pitched and flat roof designs, to help reduce the overall increase in bulk and massing, the increase in roof height is not considered to be extortionate, or detract from the appearance of the existing buildings as a whole, alongside the energy retention benefits gained from the alterations proposed.

In summary, in combination with the proposed landscaping scheme, the proposals will promote good design by ensuring the form, scale, layout and details respect and enhance the site itself and the surrounding landscape. The proposals will be sympathetic to the character of the Holme Valley and will add to the overall quality of the area, in compliance with neighbourhood, local and national design planning policies.

The proposed development is therefore considered to comply with Local Plan Policy LP24, Policy 1 of the HVNDP, and paragraph 135 in the NPPF.

Landscaping

Local Plan Policy are LP32 – Landscape – requires proposals to be designed to take into account and seek to enhance the landscape character of the area.

Policy 2¹¹ of the Holme Valley Neighbourhood Development Plan (HVNDP) also set out various design objectives to protect and enhance landscape and built character in the Holme Valley in terms of landscaping, local character, built form and materials and amenity.

In combination with the objectives to secure biodiversity net gain (see section below), the proposed landscaping scheme seeks to improve the condition for ecological habitats around the pond, in

¹¹ 'Protecting and enhancing the build character of the Holme Valley and promoting high quality design'

addition to improving the biodiversity and ecological opportunities across the site, through the following measures:

- Enhance areas of modified grassland to the south-east by seeding it with a suitable native wildflower mix. A range of meadow mixes, with varied percentage of flowers and grasses, will provide a diversity of habitats and species to attract a broad range of species.
- Enhance the pond through improved water quality and the planting of emergent, submerged and floating species, as well as a floating pontoon for aquatic birds.
- Proposed native woodland understorey immediately to the east of the pond.
- Planting native scrub species within the area of modified grassland to the north of the pond.
- Proposed low scrubland in the far south-eastern corner of the site between Longley Lane and Dunford Road.
- Planting new trees that will feature a galvanised tree guard to help with establishment.
- Planting native species rich hedgerow along the site boundary. A Landscape Maintenance Plan document also accompanies the planning application.

Local Plan Policy LP34 - Conserving and enhancing the water environment – seeks to ensure no deterioration of water bodies.

The pond is proposed to be improved in terms of its ecological value through, for example, regrading of the pond edge to incorporate a shallow ramped area for pond animal / invertebrate species to safely enter and exit the pond; planting of wetland trees & shrubs, and marginal trees & shrubs; the creation of floating pontoon of vegetation to allow ducklings and small mammals to shelter from prey; and a wading pool at the edge of the pond will allow birds and mammals to easily access the pond and provide a shelter habitat for breeding.

Residential Amenity

Local Plan Policy LP24 states:

'Proposals should promote good design by ensuring: b. they provide a high standard of amenity for future and neighbouring occupiers.'

This is echoed in paragraph 135 f) in the NPPF.

Paragraph 198 in the NPPF also states:

'Planning policies and decisions should also ensure that new development is appropriate for its location. In so doing they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.'

The proposals relate to an extension for cottage cheese production which is inherently not a noisy manufacturing process, essentially involving production of dairy products within stationary vats, and a process of (silent) maturation over a period of time.

The extension location is situated further away from residential properties on Longley Lane than the nearest parts of the existing factory, and on the opposite side of the buildings. The proposed extension would not cause any issues of overlooking, overshadowing, or any other loss of residential amenity (the Council agreed with these aspects in their pre-application response).

The proposals are therefore considered to be compliant with the aforementioned local and national planning policies that seek to safeguard residential amenity.

Highway Considerations

Local Plan Policy LP21 states:

'New development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of the development are not severe.' NPPF Paragraph 116 states, "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."

A Transport Statement accompanies the application.

Existing Site and Transport Overview

The current transportation includes a fleet of distribution vehicles including rigid vans and HGVs, 2 delivery milk tankers and externally operated tankers removing Whey, a by-product of Cottage Cheese production. The site has sufficient on-site parking for 128 staff and has good segregation of staff and commercial vehicles. Visibility for traffic coming into and out of the site is good.

Longley Farm has a core fleet of 10 HGV vehicles dedicated to delivering to large retailers across England. This is made up of 7 x 18-ton Rigid with a pallet capacity of 16 and 3 x Articulated Lorries.

To cover the whole of the UK on any given day a maximum of 8 of these 10 vehicles are used to make deliveries, two of which can be identified as 'spare' vehicles. These are used when, for instance, MOTs, repairs and planned preventive maintenance are carried out in line with the requirement of an operator licence or, for example, a rigid can be used rather than an articulated lorry. Each of the 8 vehicles leaves site once and arrives back at site once. Please see Appendix B of the Transport Statement. Please note that not all journeys start and end on the same day.

Within the distribution fleet there are also 6 x 7.5-ton Rigid 'shop vans', 1 x 3.5-ton box van and a smaller Transit Connect. These are not used for the deliveries that the increased capacity will affect.

This gives a maximum of combined on and off-site movements of 30 per day for the distribution fleet. 15 off and 15 on.

Deliveries are currently made 6 days per week (Monday to Saturday) and there is no plan to include Sundays moving forward.

Longley Farm owns and operates two 19,000 litre commercial tanks which collect on average 508,404 litres of milk a week in 35 tanker trips.

Longley Farm produces 280,000 litres of Whey a week, which is taken from site in 11 trips of 28,000 litre capacity tankers.

Proposed Transport Overview

It is estimated that the increase in vats will see a 33% increase in production from 75 tons to 100 tons per week.

An additional 25 tons of Cottage Cheese production will equate to approximately 56 pallets of Cottage Cheese. However, this will be spread throughout the production week and equate to approximately 9 pallets per delivery day.

It has been identified that the current fleet has capacity for additional pallets as shown in Appendix A of the Transport Statement. The additional volume produced can be absorbed into the current Distribution Fleet for delivery with no additional journeys. The distribution fleet will remain as existing as shown in Appendix B.

A 33% increase in cottage cheese production will certainly require an increase in milk supply, but it does not follow that the overall milk supply needs to increase by the same proportion. It is thought that that an additional 2 farms will be needed to support the increased capacity: around 20,000 litres every alternate day. This would require 2 or 3 additional milk tanker trips each week, an increase of just 8.5% on existing. The farms will be recruited as locally as possible, and certainly within the East Pennine Milk Field.

However, the process of recruiting new farms from existing supply contracts is slow, so it is expected that this increase will take around 2 years.

Once the new cottage cheese vats are up and running the space vacated by the old vats will be used to develop the processing of the Whey by-product, with several possibilities as to its use. The whey by-product has a high-water content, which is greatly reduced by processing, which reduces the volume by around 50%. The water residue will be drained under gravity to the on-site effluent treatment plant. The tanker trips leaving site with whey will be reduced by about 50%, a reduction from 11 trips to 5 or 6 per week.

Through efficiency in production methods, it is not expected that staff numbers will be increased with any of the changes proposed.

Longley Farm are currently reviewing the provision of on-site EV charging, linking with the installation of substantial solar photovoltaic panel arrays.

It can be concluded that with the increase in production of Cottage Cheese at Longley Farm, no additional on and off-site movements will be created in terms of the Distribution Fleet and will remain as per Appendix B.

Once new farms have been recruited and whey processing started it is expected that on balance of milk deliveries and whey transport there will be an overall **reduction** in tankers trips from **46 trips** (35 milk deliveries, 11 whey tankers) to **44 trips** (38 milk deliveries and 6 whey tankers).

In connection with the proposed maintenance access for the new cottage cheese vats, use of the track will be extremely limited. Replacement or repair of plant is estimated to be at most a 2 - 5 yearly event. Major replacement would be 20 years plus. At such times, banksmen will be used when existing/entering the field.

In terms of parking, given that there are no proposals to increase employee numbers, or the number of service vehicles as outlined above, no additional parking provision is necessary.

At the time of writing, no specific highways related pre-application feedback has been received. Nevertheless, based on the above, the proposals are considered to comply with Local Plan Policy LP21, and Paragraph 116 of the NPPF.

Accessibility and sustainable modes of travel

Given there are no proposals to increase employee numbers through the proposed development scheme, a Travel Plan is not strictly necessary – i.e. there is no impact on staff traffic for a Travel Plan to mitigate. NPPF paragraph 118 only requires a Travel Plan whereby a development “will generate significant amounts of movement”.

Nevertheless, some additional information regarding staff and travel modes has been incorporated into the Transport Statement.

Longley Farm employs 128 people Monday to Friday who travel to work by various means. Though 115 staff parking spaces are available in on-site car parks, Longley Farm has for many years engaged in practices which encourage sustainable transport options:

- Longley Farm prioritises local recruitment, advertising roles through local platforms first to attract candidates from nearby areas. This helps reduce the need for long commutes and naturally encourages sustainable commuting, reducing reliance on private car travel.
- Proximity of Housing – Longley Farm owns residential properties close to the workplace, which enables some employees to walk to work.
- Cycling Facilities – Shower and storage facilities are provided to support those who cycle to work and to encourage cycling as a primary mode of transport. It is estimated that 5% of staff currently travel to work by bike.
- Informal Car Sharing – Car sharing is encouraged where practical, particularly among staff who live in nearby areas or follow similar routes.
- Public transport is available in the vicinity of the site:
 - The most frequent service (310) operates at the junction of Dunford Road and Cross Gate Road – 0.5 miles away (10 min walk). This is an hourly service running between Huddersfield, Holmfirth and Scholes / Hepworth, and operates between 05:40 and 23:50 hours daily (slightly later start and earlier finish on Sundays)
 - Services 25a, 29 and 87 immediately adjacent to the site entrance on Dunford Road (Sheffield – Holmfirth; Penistone – Holmfirth; Holmfirth - Castleton) provide a limited service on various days Monday to Friday,

Public transport therefore offers an alternative to private car travel for employees and visitors.

The proposal site also provides immediate proximity to a wide and useful network of public footpaths and bridleways, which help encourage walking and cycling.

As the enclosed Transport Statement / Travel Plan details, a breakdown of staff travel distances reflects this policy with 18% of staff living within a mile of the dairy, 62% between 1 and 5 miles and 20% living over 5 miles away from site.

The proposals are therefore considered to comply with HVNDP Policy 7, Local Plan Policy LP20 and NPPF Paragraph 117 particularly given the NPPF policy requirement for flexibility for rural areas (Paragraph 110).¹²

Ecology

An Amphibian Survey has been produced by JCA Limited and accompanies the application. The survey concluded the following:

- The pond has average suitability to support breeding Great Crested Newts, but the environmental DNA analysis indicated that GCNs were not present and therefore a GCN Mitigation Licence is not required.
- The proposed development would see the loss of an area of the pond. However, the proposals also include the creation of a new wetland area which could provide suitable habitat for amphibians in the future.

A Preliminary Ecological Appraisal, Preliminary Bat Roost Potential Survey and Bat Emergence Survey have been produced and accompany the application. The key points of note are as follows:

- The buildings are considered to have low suitability for roosting bats. However, one dusk emergence survey was recommended on the building to be extended, and which was carried out in July 2025. The survey found that no bats were observed emerging from the surveyed building. The available evidence also suggests that bats are not currently roosting within the surveyed building. The site also has low suitability value for commuting and foraging.
- It is recommended that two externally fitted bat boxes are installed on the site, though roosting on the building fabric itself should not be encouraged under BRC Global Standard for Food Safety onto the new extension or retained buildings.
- The site habitats offer suitability for nesting birds. As such, vegetation clearance should be undertaken outside of the bird nesting season (March to September).
- It is recommended that two bird boxes are affixed to retained trees within the site.
- Best Practice Measures should be used during construction to protect other species in the unlikely event they are found on site including amphibians, badgers, invertebrates, reptiles and brown hares.
- It is recommended that brush piles are placed around the site in the retained areas of aquatic marginal vegetation and/or scrub.

¹² "Opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

Finally, an Ecological Impact Assessment Report has been produced by JCA Ltd and accompanies the application. This provides recommendations in terms of mitigation and enhancements in connection with the proposed development.

The proposed development is therefore considered to be acceptable with regard to ecology and accords with Local Plan Policies LP30 and LP34 and the aims of Chapter 15 in the NPPF.

Biodiversity Net Gain

Government Guidance on Biodiversity Net Gain states at Paragraph 002:

“The statutory framework for biodiversity net gain has been designed as a post-permission matter to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Once planning permission has been granted, unless exempt, a Biodiversity Gain Plan must be submitted and approved prior to the commencement of that development.”

As the Guidance also confirms (Para 024), “the biodiversity gain condition has its own separate statutory basis, as a planning condition under paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990. The condition is deemed to apply to every planning permission granted for the development of land in England.”

In accordance with Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the minimum information needed to accompany the application is contained within the application form accompanying this application.

A Biodiversity Net Gain Assessment has been undertaken by ECUS Ltd and accompanies the application.

The baseline area habitats recorded for the site comprise other neutral grassland, modified grassland, mixed scrub, ponds, vegetated garden, artificial unvegetated, unsealed surface, sealed surface and urban trees. The pre-development habitat has a biodiversity value of 11.20 units. The site also includes non-native and ornamental hedgerows with a biodiversity value of 0.03 units.

It is anticipated that the proposed development would result in the partial loss of modified grassland, mixed scrub, pond and urban trees. The post-development area-based habitats are estimated to have a biodiversity value of 10.42 units which equates to a net loss of -6.93%. The post-development value of hedgerow units would remain at 0.03 units.

In order to achieve a 10% net gain, habitat creation and enhancement measures are required. The report recommends the following:

- The enhancement of areas of modified grassland by seeding it with a suitable native wildflower mix.
- The enhancement of the pond through improved water quality and the planting of emergent, submerged and floating species.
- Planting native scrub species within the area of modified grassland to the north of the pond.
- Planting 20 small trees along boundary features of the site.
- Planting 5 additional metres of native species rich hedgerow along the site boundary.

These recommendations would result in a **11.67%** biodiversity net gain.

The information provided with this application is therefore considered to address relevant statutory requirements and complies with HVNDP Policies 1 (protecting and enhancing the landscape character of Holme Valley) and 13 (protecting wildlife and securing biodiversity net gain), Local Plan Policy LP30, and the aims of Chapter 15 in the NPPF.

Trees

An Arboricultural Report and Arboricultural Impact Assessment has been produced by JCA Limited and accompanies the application. The main findings and recommendations are summarised below:

- The Tree Survey covered six individual trees and three groups of trees. All of the trees were classified as category 'C' low value trees.
- To facilitate the proposed development, it will be necessary to remove tree T1.
- To ensure the effective protection of retained trees during construction, a protective barrier should be installed comprising of protective fencing and ground protection. Where possible, routes for pedestrian and site traffic should be located outside of and away from the Root Protection Area of the retained trees. Where this is not practical, ground protection should be laid over the unprotected RPAs.
- The footprint of the proposed extension would not encroach into the RPA of the retained trees. As such, no specialist construction or foundation methods are considered necessary.

The proposals are therefore considered to be acceptable and comply with Local Plan Policy LP33.

Flood Risk and Drainage

Local Plan Policies LP27 and LP28 address flood risk and drainage respectively. A Flood Risk Assessment and Surface Water Drainage Assessment accompany the application.

In summary, these reports demonstrate the proposed development would be operated with minimal risk from flooding; and would not increase flood risk elsewhere. The development will considerably reduce the flood risk posed to the site and to off-site locations due to the adoption of a SuDS Strategy.

The SuDS strategy delivers measurable betterment compared to the existing run-off regime, by reducing peak discharge rates to below Greenfield levels and provides significant attenuation within the existing on-site pond.

The Lead Local Flood Authority (LLFA) team were consulted as part of the pre-application enquiry. The LLFA noted that there is no objection to the alteration of the existing pond to accommodate the proposed extension. However, they suggested that the applicants examine how the pond is fed and if there is an emergency means to drain it down.

With regards to the outflow design, the design provides an overflow weir, and outfall is directed away from any buildings or other development.

The proposals are therefore considered to comply with Local Plan Policy LP27 & LP28.

Coal Mining Legacy & Contaminated Land

Phase 1 Desk Top and Phase II Geo Environmental Reports have been produced by Rogers Geotechnical and accompany the application.

The reports provide details concerning the nature of underlying soils on the site and the risk of land contamination. The report is considered to accord with the requirements of Local Plan Policy LP53 and paragraph 196 in the NPPF and it is considered that compliance with the recommendations made within the report could be conditioned as part of the planning permission.

Climate Change and Environmental Benefits

Paragraph 164 in the NPPF states that, *'New development should be planned for in ways that: b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design.'*

Local Plan Policy LP24 also states that, *'Proposals should promote good design by ensuring: d. high levels of sustainability,'* through a number of criteria.

A Climate Change Statement is submitted as part of the application. Climate change mitigation measures have been incorporated into the proposals, and these are summarised below:

- Use of thermal efficient materials
- Installation of solar panels
- Incorporation of green roofs
- Use of reclaimed materials – timber and stone
- Sustainably sourced materials
- Use of local contractors and suppliers
- Possible use of battery storage
- Use of permeable materials for access track
- New and improved soft landscaping

It is important to note that Longley Farm has invested heavily in the last twenty-five years to reduce energy demand and be more sustainable. These measures / investments have included the following:

- Installation of a community owned wind turbine which provides Longley Farm with a significant proportion of its electricity
- Installation of LED lighting throughout the site
- Installation of energy efficient boilers
- Improved thermal efficiency and insulation of on-site equipment – refrigeration units etc
- The use of reclaimed materials on other projects
- The use of local contractors and suppliers on other projects
- Use of the pond on-site as an attenuation tank to manage outflow
- Provision of on-site cycling facilities

It is considered that the proposals would have a positive impact on climate change and accord with Local Plan Policies LP24 and LP26 and HVNDP Policy 12 (promoting sustainability).

Other Planning Matters

- a) Crime Prevention

Although no specific advice from the Designing Out Crime Officer at the pre-application stage, the applicant is content to provide further details at a later stage through a pre-commencement or pre-occupation condition, in the event planning permission is granted.

b) Heritage

The site is not located within a Conservation Area and there are no listed buildings in the vicinity whose setting would be affected by the proposed development.

c) Public Rights of Way

Public right of way no. HOL/166/30 runs in a SE to NW direction just to the south of the site, but would be unaffected by the proposals.

d) Air quality

The submitted Transport Statement and Appendices outline there will be no additional on and off-site movements created in terms of the Distribution Fleet, and that it is expected that on balance of milk deliveries and whey transport, there will be (over time) an overall reduction in tanker trips from 46 trips (35 milk deliveries & 11 whey tankers) to 44 trips (38 milk deliveries and 6 whey tankers). There would also be no additional staff trips to work.

It is therefore considered that an Air Quality Assessment would not be required on this occasion.

e) Office uses – main town centre policy matters

Through the pre-application process, officers stated: “Whilst the application site is located outside of any designed centres, based on the details available to officers at this time, subject to the proposals office space not materially increasing compared to that existing, the office space would be considered ancillary to the principal manufacturing use of the site. Evidence to this effect should be provided at application stage.”

As confirmed in the Floorspaces Table at Appendix 2, the office space would only increase by 0.24% (30 sq.m) as a result of this application. It would therefore be considered to continue to be ancillary to the principal manufacturing use of the site.

Conclusion and planning balance

Longley Farm is an award-winning independent family business operated by the Dickinson family, producing a wide range of dairy products enjoyed by people throughout Yorkshire and around the world. The dairy has been in operation since 1948, and the site is used for the production and packing of all their products. Longley Farm draws its milk supply from a dedicated group of local farmers. One relies on the other. With no milk there is no dairy and with no dairy, there is no milk.

The key focus of this scheme relates to the need to accommodate more reliable and increased production of cottage cheese. The current cottage cheese vats are very elderly and are in need of replacement. They cannot cope with the demands being put on them, either in terms of capacity or reliability. A dedicated space for the cottage cheese vats, including external access to enable individual vats to be replaced over time when needed would be a benefit that currently does not exist.

The principle of development is submitted as being acceptable in this Green Belt location on numerous grounds – principally that the proposals fall into the category of Grey Belt development, or that very special circumstances exist in the event the Local Planning Authority determine the development does not fall within the category of ‘appropriate development’ for any reason.

There is an essential need for the development and the economic & operational benefits of the development are significant:

- The Longley Farm site has evolved entirely on the present-day site. The manufacturing chain comprising the supply of raw materials, the production lines, and then the packaging lines (together with all the other necessary ancillary activities - testing labs, administration offices etc). They are all entirely intertwined and cannot be separated or disaggregated elsewhere.
- The proposals will enable increased production, by replacing three obsolete cottage cheese vats with six new ones of better quality and design.
- The existing vats are at full capacity, meaning that any failure of one or more of the vats, puts the cottage cheese production line in serious jeopardy. Spare capacity will also be secured (which currently does not exist) in the event of a vat failure. The new facilities will enable production to occur on rotation, thereby allowing two vats to be ‘rested’ in between production cycles. This will enable Longley Farm to produce a consistent and reliable supply of cottage cheese, as well as a minimum 33% increase in supply above current levels.
- The proposals also include external access to enable individual vats to be replaced over time when needed - a benefit that again, currently does not exist.
- The anticipated revenues arising from the increase cottage cheese production, will enable Longley Farm to re-invest in the factory as a whole – overdue renovations (leaking roofs, asbestos removal etc), and other improvements such as investing in a new (very expensive) deep freeze facility and upgrading yoghurt production equipment dating from the 1970s - to keep the business on a sustainable footing for the longer term.
- Longley Farm has a symbiotic relationship with its supplying farms - milk being the overwhelming main raw ingredient for all Longley Farm’s dairy products. The business owns and manages 930 acres of land for dairy farming and also buys the vast majority of the milk produced from 22 local farms at a sustainable price, enabling these farms to remain viable. These farms cannot survive without Longley Farm, and Longley Farm cannot survive without these local farms. The continued success of the Longley Farm business is therefore very important for the local rural economy. This investment is therefore a statement of faith in the local rural economy.
- The location of the Longley Farm business in its current location south of Holmfirth is critical in terms of its proximity to its supplying local farms. If Longley Farm is unable to expand in its current location, in addition to it not being viable to move the factory in any case, the close geographical ties with these milk suppliers would be at risk. This location also helps mitigate carbon emissions as transport miles are minimised as a result of the suppliers and the factory being in close proximity to one another.

- The dairy farm industry in Kirklees has almost completely collapsed in recent years, and yet as a result of increased demand, one new farm has recently opened up and it is hoped that these proposals will help facilitate a further revival in the local dairy farm industry.
- Pre-application engagement with Kirklees ward and other senior councillors has generated strong support for the applicant's proposals.

The applicant submits that the scheme is acceptable in this location with regard to either Grey Belt considerations, or that very special circumstances exist in this case to outweigh harm by reason of inappropriateness, and any other harm identified.

NPPF Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development and that (Paragraph 8) there are three overarching sustainability objectives – social, economic and environmental. For the reasons described within this Planning Statement, the proposed development is considered to fulfil the relevant key sustainable development objectives through:

- 1) **Economic** – the proposals help “build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.”
- 2) **Social** – the design and materials of the scheme are carefully considered and are considered to assist in “fostering well-designed, beautiful and safe places.”
- 3) **Environmental** – the proposals would enhance the built environment of Longley Farm through the design and materials, as well as enhancing the natural environment through on-site land and aquatic ecological improvements. The proposals would also make effective use of a brownfield site, improve biodiversity, and mitigate climate change as detailed above.

NPPF Paragraph 11c states that decisions should apply the presumption in favour of sustainable development by (c) “approving development proposals that accord with an up-to-date development plan without delay”

Balancing the various material planning factors in this case, the proposals before the Council are considered to achieve the objectives of sustainable development in accordance with the National Planning Policy Framework, and also accord with the Council's Local Plan.

The Longley Farm extension project represents a significant opportunity to secure sustainable development for the Holme Valley area and wider Kirklees borough.

We therefore respectfully request that planning permission is granted accordingly.

Robert Halstead Chartered Surveyors & Town Planners

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Appendix 1 – Councillor consultation document

Longley Farm plans for the future

Longley Farm is pleased to announce its plans to make major improvements at the dairy in Holmfirth.

A deep freeze has already been commissioned and the installation of new equipment for making yogurt is underway. The next stage envisaged is the building of a new cheese room, where the latest equipment can be housed to improve the manufacture of cottage cheese.

Longley Farm is a leader in the technology that can be applied when producing high-protein dairy products; a journey that started with the introduction of yogurt in the 1960s and cottage cheese in the 1970s.

Cottage cheese is one of the purest forms of protein-based foods available. Over fifty years of experience have gone into making Longley Farm cottage cheese such a national favourite.

Jimmy Dickinson, talks about how Longley Farm's famous cottage cheese came into being

“My father spent five years in the Navy during the Second World War. He saw service in the Battle of the Atlantic up to D-Day. In 1944 his ship sailed through the Panama Canal as part of the British Pacific Fleet. He was there up to, and beyond, VJ Day, He returned to be demobilised in 1946. In those two years, he spent a lot of time with the Americans and saw many innovations, such as frozen ready-meals, ice cream dispensers and cottage cheese. He visited America again in 1964 and saw the popularity of cottage cheese. By the early 1970s, he decided to try making it himself. It was extremely hot, hard and very manual work. He pioneered cottage cheese making in the UK and the recipe used in the country today is essentially his. Fifty years have shot by and all that hard work has laid the foundations of something that we can all be proud of. “

Longley Farm cottage cheese has been a firm favourite with UK households for many years. Recently the exceptionally high protein content of cottage cheese, particularly the fat-free variety which is 100% protein, has resulted in a social media (TikTok) 'cottage cheese' phenomenon and a corresponding significant increase in demand for Longley Farm's cottage cheese.

The current cottage cheese vats are very elderly and are in need of replacement. They cannot cope, either in terms of capacity or reliability, with the demands being put on them. It would take many months to replace them in their current location. Stopping production is not an option and so the replacements must be located in a new area which is alongside.

The planned new extension would provide a number of significant benefits:

- 1) Increased production, by replacing three cottage cheese vats with four new ones of better quality and design.
- 2) Having two spare vats in addition allows vat rotation and resting, as well as the ability to cope with failures, breakdowns and regular maintenance. This will enable Longley Farm to produce a consistent and reliable supply of cottage cheese.
- 3) A dedicated space for the cottage cheese vats, including external access to enable individual vats to be replaced over time when needed would be a benefit that, currently does not exist.

4) Longley Farm draws its milk supply from a dedicated group of local farmers. One relies on the other; with no milk there is no dairy and with no dairy, there is no milk. This investment is a statement of faith in the local rural economy.

The planning application also includes the reroofing of the existing dairy. This is needed not only because of the age and poor condition of the roof cladding, but also because restricted height is preventing the installation of new equipment and limiting production. Reroofing gives the opportunity to further reduce energy use, with improved thermal insulation and the introduction of solar panels.

A planning application will be submitted shortly.

The continued viability of cottage cheese production and, indeed, of Longley Farm itself as well as many local farms, are reliant on these plans being granted planning permission

Appendix 2 - Table of existing and proposed floor areas

LONGLEY FARM FLOOR AREAS (m2)					
Existing Department	Production	Storage	Office/ Staff	Support /Circulation	
Dairy Ground	3371				
Dairy First		464	526		
Workshop/Boiler	388				
Cottages /First Aid			137		
Ramp/Lockers Ground				116	
Ladies/Offices First			164		
Ramp/ Bridge				157	
Tanker Bay	715				
DAS Ground	2300				
DAS First			364	86	
Chemical Store		101			
Bottom Shed Ground	2487				
Bottom Shed First		671			
Bottom Shed Second		129			
Totals	9261	1365	1191	359	12176
Proposed Works					
Office Accommodation Lost			-121		Ground and first floor
Dairy Accommodation Gained	130				
Proposed New Extension Grd	749				
First Floor	250		151		
Totals	1129		30		1159
Percent Increase in Area	12.19%				9.52%

Appendix 3 – Supply and Demand Figures / Graphs

