

Planning Statement

32 Station Road, Batley

Kobbsy Limited and Noksbba Limited

November 2025

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1. Introduction

- 1.1 This planning statement has been prepared in support of an application lodged by Kobbsy Limited and Noksbbba Limited. The application proposes the conversion of 32 Station Road into 8 apartments (Use Class C3).
- 1.2 The site is Grade II Listed¹ and sits within the Station Road Batley Conservation Area. It is within a designated Priority Employment Area, and close to- but outside- Batley Town Centre.
- 1.3 The site has most recently been used as a mix of customer focused commercial uses, including office, tanning studio, hair and beauty, a café, and event space. However, this has not been commercially successful and an alternative viable use needs to be found which is consistent with conservation objectives of this designated heritage asset.
- 1.4 This application seeks to preserve, repair and maintain the exterior of the building, as well as the main features of interest internally. Works to convert the building will involve some internal changes, but these have been designed to remove only modern additions or features of low significance. The majority of the new works will also be reversible.
- 1.5 This planning statement considers:
 - i) The Site location and description, including relevant planning history
 - ii) A description of the proposed development
 - iii) The Principle of the Development- including key issues around heritage, space standards and loss of employment land
 - iv) Material considerations- including highways, ecology, amenity, drainage and noise
 - v) The Benefits of the Development
 - vi) The Overall Planning Balance
- 1.6 We conclude that the proposal accords with the Development Plan, is sustainable development and that there are no material considerations that weigh against the approval of this application.
- 1.7 We also identify a number of benefits arising from this proposal which suggest that this application should be approved “without delay” in line with national policy requirements.

¹ [32-40, STATION ROAD, Non Civil Parish - 1300286 | Historic England](#)

2. Site Location and Description

- 2.1 The site is around 200sqm / 0.02Ha and is located to the south east of Batley Town Centre and to the west of Batley Station. The site location is shown in the aerial photograph below:



- 2.2 The main entrance to the property is on Station Road, with access to the rear, via Spurr Street. At the western side of the property is the Council owned Station Road Car Park. Station Road has a mix of uses including offices, bars, commercial uses, a dance studio and several housing conversions.
- 2.3 The site has a mixed planning history, with duplicate proposals in the early 1990s for a leisure centre and hot food take away being simultaneously refused and approved².
- 2.4 The current building is occupied by a mix of commercial uses, but is currently vacant. That former mix of uses- including office, event space and hair & beauty related space has clearly not succeeded.
- 2.5 The building dates to around 1870 and is built in the Italian Gothic style. It was built as a warehouse designed to display and sell goods to people approaching from the station. The Conservation Area Appraisal describes the objectives, development and ultimate demise of this area clearly and succinctly:

These were not designated as humble storage buildings, but were intended to parade the wealth and prestige of the wool manufacturing firms that built them to display their wares to buyers brought by railway from all over the world. They were a short lived success in this role as buyers preferred to go direct from the station to the mills. Mill owners themselves therefore made less use of the Station Road premises over the years. After a brief ten year spurt of building activity on Station Road the selling houses languished, leaving several

² 92/03021 and 92/03022

undeveloped sites which were never built on. Despite this, the sheer quality of the small number of selling houses built, their consistency of scale and the strict adherence of frontages to the line of the street make for fine townscape.

Two blocks of buildings play a key role in enclosing and dominating the street. On the crown of the hill stands The Crescent (32-40 Station Road), now sadly depleted by the loss through the fire of its central portion but still a magnificent Italian Gothic composition....

- 2.6 32 Station Road is one of the remaining parts of this important and prominent building.
- 2.7 The site is located in a location that has good access to a range of services and facilities. It is within walking distance of:
- Batley Station
 - Bus Stops on Rose Mill Lane
 - Batley Town Centre
 - The large Tesco Extra in Batley
 - Local open space at Field Lane and Taylor Street
 - Sports facilities at Heritage Road including Batley cricket Club, the Batley ARLFC, and Mount Pleasant Stadium
 - Upper Batley High School
 - Field Lane Junior Infant and Nursery School and Hyrstmount Junior School
- 2.8 Future residents will have excellent access to food, health, open space, and sustainable travel modes.

3. Proposed Development

3.1 The proposed development is to convert the existing building into 8 apartments in use class C3.

3.2 The application plans show the extent of the proposed works. The exterior of the building will be retained largely “as is”, although there will be some minor repair works and also works to doors and windows to make them secure. These are limited to:

- Rear door being reinstated and made good, or replaced if repair is not feasible
- Side double doors being retained and repaired, with new locks. This entrance will be sealed from within with insulated stud walling, to suite the internal layout but retain the original structure and doors. This work will be reversible.
- Re-glazing two side windows to provide obscure glazing for privacy purposes, up to 1500mm

3.3 Inside, several modern internal walls will be removed across all floors. The heritage statement confirms that “the building provides little in the way of evidence of the early plan form”. The staircases are also thought to be modern.

3.4 The conversion works would be undertaken in a way which would be reversible and minimise intrusion into the original fabric of the building. This would introduce subdivision, but that is considered to be necessary to secure a sustainable future for this important building.

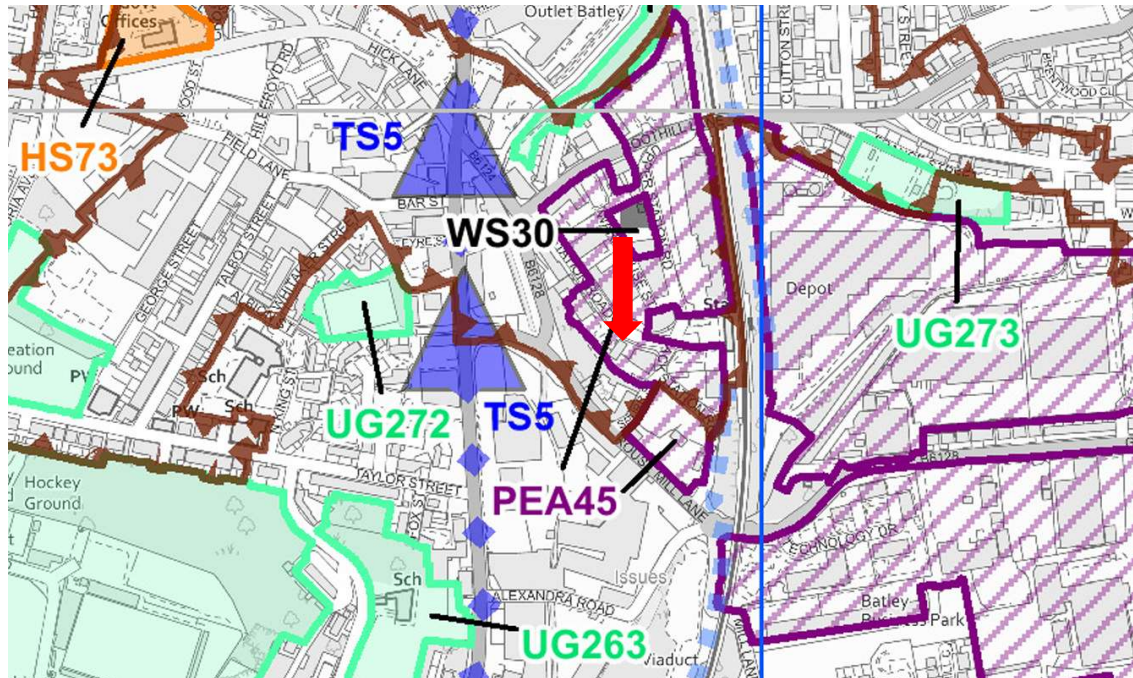
3.5 The internal strip out of modern additions will be replaced by a new reversible structures that divide the spaces into a series of apartments. The space provided by floor is set out below:

Floor	Apartment	Bedrooms	Size (sqm)
Basement	1	1	42
Basement	2	2	64
Ground Floor	3	1	45
Ground Floor	4	1	42
First Floor	5	1	46
First Floor	6	1	47
Second Floor	7	1	41
Second Floor	8	2	62

3.6 The adequacy of these space allowances are considered later in this report.

4. Principle of Development

- 4.1 The site is within the main urban area of Batley. It is within a Priority Employment Area, the Station Road Batley Conservation Area and is close to Batley Town Centre:



- 4.2 The site is obviously urban, brownfield and has a long history of development. The main issues of principle are considered to be:

- Loss of Employment Land, and
- Heritage

- 4.3 These are considered further below.

Loss of Employment Land

- 4.4 This site is within PEA45, a 3.75Ha employment zone in the Batley and Spen sub-area. Policy LP8 supports employment uses in this designation, and only supports non-employment uses when the following criteria can be satisfied:

- a. It can be demonstrated that the site or premises are no longer capable of employment use; and
- b. The proposed use is compatible with neighbouring uses and where applicable, would not prejudice the continued use of neighbouring land for employment.

- 4.5 Clearly, the building is of some historic importance and has the feel and layout of an office or service based use- rather than a typical storage or industrial use. This is a major limitation for general employment re-use, as modern occupiers for general employment uses require

more open and flexible spaces, with dedicated delivery and servicing space. None of these physical characteristics exist with this building.

- 4.6 Clearly, whilst this site was originally conceived as a storage and display use, this was for a very specific purpose- and the concept of capturing purchaser interest failed fairly quickly, as it is understood that the target buyers preferred to visit the actual factory spaces, rather than the “show room” that this building was conceived to be. This was never intended to be a manufacturing or storage building- it’s modern equivalent would be an office and showroom use.
- 4.7 The location of the site is a further factor that works against modern employment uses on this site. There are businesses nearby that operate as “general employment” uses, but these are older buildings, that have expanded over time and have evolved to suit the specific processes carried out. None of these are “investment grade” modern stock, and are generally considered to be sub-optimal remnants of an older industrial area.
- 4.8 Access to the motorways is particularly poor from this location- J27 is some 6km to the north east, via Batley town centre and Birstall Retail Park, which is a very congested route. J26 is also some 6km away. Both routes pass numerous residential properties, which is less than ideal.
- 4.9 The fact that the property is Listed also limits the physical works that could be undertaken to satisfactorily convert it to a suitable general employment use.
- 4.10 The format of the building is, however, potentially more suited to an office use. The site is located around 400m to the south east of the defined Batley Town Centre. Office uses are controlled by Policy LP13, which requires a sequential test for this use. The building is around 400sqm in total and so an impact assessment would also be required.
- 4.11 The physical format of the building is likely to be suitable for an office use- but town centre policy would be unlikely to support such a use in this location. Equally, the market for office space in this area is modest, and any local market interest in office premises of this scale should be directed towards the defined town centre.
- 4.12 The building has already been used for a range of pseudo-retail and office type uses- including office, tanning studio, hair and beauty, a café, and event space. The planning history behind these previous business uses is unclear- however, it is clear that those uses have failed.
- 4.13 This building was purchased by the applicant with a history of failed commercial uses that are broadly suitable for the building format- but are unlikely to be supportable in planning policy terms, and which have a limited market in this area.
- 4.14 It is recognised that there is a general shortage of employment uses in Kirklees, and that the objective of this policy is to prevent that loss. However, this building has a number of constraints- both policy and practical- which mean that a suitable employment use is not likely to be found for this building.

- 4.15 The priority has to be to find a viable use for this building that is consistent with its conservation- in line with NPPF 210 (a).
- 4.16 A range of commercial uses has already failed and it is likely that further employment uses are not likely to represent an enduring solution, which can secure in the inherent interest of this building from a heritage perspective. It is considered that this building is no longer suited to employment use, and that positive consideration should be given to an alternative- where residential is considered to offer the best chances of securing the future of this important heritage asset.
- 4.17 Policy LP8 also requires an applicant to demonstrate that the proposal would be compatible with neighbouring uses- this is in line with the “agent of change” principle discussed at NPPF 200. The onus of that policy is placed on the applicant to “provide suitable mitigation before the development has been completed”.
- 4.18 The introduction of residential uses into this area- considering its general character and the fact that this is not a typical industrial area- is most likely to cause concern due to the introduction of sensitive noise receptors. These new receptors may then hamper the ability of adjacent businesses to carry out their normal operations, without causing a statutory nuisance.
- 4.19 This application is accompanied by a noise assessment, which considers the noise environment locally and suggests mitigation in line with BS8223 and the WHO guidelines. This found an absence of any notable industrial noise in the area, and focusses on rail and road noise as the dominant sources in the area.
- 4.20 The noise report concludes that average bedroom noise levels at day and night times would be below BS8233 thresholds; but that there are peak noise events which exceed both BS8223 and WHO guideline line levels.
- 4.21 Whilst a specific glazing recommendation is not made in the report, it does suggest that consideration should be given to glazing improvements. There are a number of broken windows at the moment, and the applicant has not yet proposed a particular solution- due to the Listed nature of the property. Their preferred approach is to discuss the most appropriate solution with the Council, post-submission, recognising that some mitigation which is appropriate to the building will be required as a result of this application - whether that be replacement windows with heritage appropriate double glazed units, or a more reversible secondary glazing solution.
- 4.22 This can be discussed and agreed during the course of the application- or if felt to be appropriate- controlled by condition.
- 4.23 On this basis, it is concluded that the introduction of a residential use into this designated PEA area would not harm the operation of adjacent businesses, and thus the second limb of policy LP8 is also satisfied.
- 4.24 It is concluded that this proposal meets the requirements of policy LP8, as a result of the inherent limitations of the building for modern employment uses and proven lack of success with previous attempts to secure a quasi-commercial operation of the building.

- 4.25 The location is not ideal for modern needs and demand for employment uses has not been demonstrated to exist. Indeed, competing policy objectives suggest that the most suitable employment use (office) would be unlikely to be found to be acceptable in this out of centre location. Issues around the “agent of change” principle can be managed by mitigation and thus it is concluded that the principle of losing employment land to residential use- in this case- should be acceptable.

Heritage

- 4.26 The key heritage concern is whether this proposal conserves the Listed Building and Conservation Area in a manner appropriate to their significance³. That significance, and the impact of this proposal, is described in more detail in the Heritage Statement that accompanies this application.
- 4.27 The statutory test for Listed Buildings is set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. This creates a duty of having “*special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”.
- 4.28 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 creates a duty in respect of conservation areas that “*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*”.
- 4.29 If there is harm (whether that be “substantial” or “less than substantial” as discussed in NPPF⁴) then the statutory requirement of giving “*special attention*” creates a “*strong but rebuttable*”⁵ presumption against the grant of permission for the development.
- 4.30 The question of whether harm arises is one of planning judgement- and is therefore unlikely to be challengeable in court unless it is plainly unreasonable⁶- but “*a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one.*”⁷. Equally, “*a finding of harm to the setting of a listed building is a consideration to which the decision-maker must give “considerable importance and weight”*”⁸.
- 4.31 However, the reverse is also true: If there is no harm, then the statutory duty is discharged and the Council can make a positive decision.
- 4.32 Where substantial harm exists, this should lead to refusal- unless that harm is necessary to achieve substantial public benefits⁹. Where there is less than substantial harm, this should be weighed against the public benefits- which includes consideration of whether the

³ NPPF 202

⁴ NPPF 214 and 215

⁵ See *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895 (Admin) at [48]-[49]

⁶ See *Tesco Stores v Secretary of State for the Environment & Ors* [1995] 1 WLR 759 “*planning judgment are within the exclusive province of the local planning authority or the Secretary of State*”

⁷ See *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895 (Admin) at [48]-[49]

⁸ *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] EWCA Civ 137

⁹ NPPF 214

proposal secures the optimum viable use for that asset¹⁰. It is considered to be desirable to sustain the significance of assets and to put them into viable uses that are consistent with their conservation¹¹.

- 4.33 The test for Conservation Areas is to “*preserve or enhance*” which has been interpreted in the courts as follows:

“In South Lakeland the issue was whether the concept of “preserving” in what is now section 72(1) meant “positively preserving” or merely doing no harm. The House of Lords concluded that the latter interpretation was correct”¹²

- 4.34 It is clearly acceptable for a proposal to simply cause no harm to a Conservation Area and so:

“...if a development would not conflict with that objective, the special attention required to be paid to that objective will no longer stand in its way and the development will be permitted or refused in the application of ordinary planning criteria”¹³

- 4.35 So, the fundamental legal questions in this case are:

- Is there harm to the retained Listed structures and / or their setting?
- Will the proposed development actively harm the character and appearance of the Conservation Area?

- 4.36 If harm does arise, which is not outweighed by the public benefits- which is a matter of planning judgement- then there is a statutory presumption against the development, which sits alongside other statutory presumptions- for example, through S38(6) which sets a presumption in favour of development that accords with the Development Plan.

- 4.37 However, if no direct harm to the Listed Building or its setting arises, and if the effects on the character and appearance of the Conservation Area are neutral, then the planning decision should proceed in the normal manner. NPPF broadly mirrors this approach, albeit with some minor language differences.

- 4.38 There is not considered to be any harm to the Character and Appearance of the Conservation Area. The external appearance of this building, and its immediate surroundings, will be maintained.

- 4.39 There will be modest improvements resulting from repairing two doors, general maintenance of the property (including clearing vegetation from the gutters and making good any damage to the rainwater goods) and through active use of the property- which will secure ongoing maintenance of the external appearance of the property.

- 4.40 There will also be some neutral changes- for example the inclusion of two areas of obscured glazing on the ground floor windows; as well as the possible replacement of the existing

¹⁰ NPPF 215

¹¹ NPPF 210 a)

¹² Quoted from *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] EWCA Civ 137

¹³ Quoted from *South Lakeland District Council v Secretary of State for the Environment* [1992]

windows with appropriate double glazed units and / or the provision of secondary glazing. There are options to provide the obscured glazing through the use of a removable film, and a secondary glazing solution would be a more reversible option for the provision of noise attenuation. The heritage report considers reglazing to be a positive effect, as this reinstates the original- however the need for some noise mitigation may reduce this to a neutral effect overall.

- 4.41 On this basis, there are not considered to be any negative factors for the Conservation Area that arise from this proposal, and there are neutral and minor positive effects on this designation. This satisfies the requirements of S72(1) and the statutory duty in respect of Conservation Areas can be discharged.
- 4.42 In terms of effects on the Listed Building, this is considered in detail in the Heritage Assessment. The building has some architectural interest, as well as historical interest.
- 4.43 The Heritage report concludes that the primary interest of the building is in its main facade on Station Road, which retains a high level of detailing.
- 4.44 Internally, there is considered to be little of architectural value retained, other than the original window and door architrave in "room 3" and the roof trusses and winch gear on floor 2. The significance of the remainder of the interior is considered to be low.
- 4.45 Most of the interior is of low importance. Modern interventions will be removed and replaced with new subdivisions to allow the conversion to take place. The interior of the building has been considerably altered over time and the heritage statement concludes that the change to floorplates is neutral- albeit the additional subdivision proposed in the basement (which has not been subject to modern sub-division already) is a minor negative change.
- 4.46 This proposal minimises the impact on original features as much as reasonably possible whilst still achieving a conversion which brings the building back into a viable use. The features of greatest interest externally will be retained. This ensures that the proposal will not erode the external appearance of the building, its setting, nor its contribution to the Conservation Area.
- 4.47 Indeed, the primary interest of this building is its historic link to the textile industry in Batley, and particularly the divergence between this building's intended and eventual role- being designed to "parade the wealth and prestige of the wool manufacturing firms" but ultimately having a short lived practical role as a "selling house" due to buyer preferences at the time. That history, and story, will not be undermined by this proposal- indeed, the ongoing journey to finding a suitable use for these buildings is furthered by trying to find a solution that will work to preserve these impressive buildings.
- 4.48 It is important to provide a meaningful use of this property in order to ensure the ongoing maintenance and the longevity of the asset. The minimal change to original fabric, and the change effected by reversible new subdivisions, are considered to be more than outweighed by the benefits derived from its conversion and future use.

- 4.49 The change to the building resulting from this application has been directed to areas where there is considered to be low significance and where significance has been diminished by other modern interventions. The features of most importance to the significance of the building would be retained and enhanced. This application preserves the features of architectural and historic importance which are central to the significance of this building. Therefore, the statutory duty under Section 66 of the Act can be discharged.
- 4.50 This proposal therefore:
- a) Accords with the controls in place to protect employment land from loss;
 - b) Preserves the contribution of the building to the Conservation Area, and,
 - c) Retains the inherent architectural, aesthetic and historic significance of this Listed Building.
- 4.51 As no harm arises to these fundamental considerations, it is concluded that the principle of converting this building to a residential use is acceptable.
- 4.52 It is, therefore, now necessary to consider whether any other material considerations arise which could outweigh the presumption that this application should be approved, in line with the Development Plan and legal duties imposed by the Act.

5. Material Considerations

5.1 Section 4 of this report considers the main issues presented by this application- namely loss of employment land, noise and heritage issues. This section considers other material considerations that may be relevant to the determination of this application. These are:

- Residential Amenity- particularly space standards
- Highways and access
- Drainage and Flood Risk
- Ecology
- Ground conditions

5.2 These are each considered below.

Residential Amenity

5.3 Issues of noise have already been discussed earlier in this report. However, there are a number of other aspects that comprise the concept of amenity- including olfactory considerations, visual change and the space available to future residents.

5.4 There are no notable olfactory issues in this area, despite there being a number of traditional employment uses nearby. There are no unusual or distinctive smells evident from visiting the site and area.

5.5 The area has a mixed character- but the overriding feel in the immediate locality of the site is of faded Victorian elegance- reflecting change over time but generally having a high quality built environment, with many buildings that have considerable architectural merit. The proposal causes no visual change to the area that could be harmful to people using the area- or indeed those living in other buildings on Station Road.

5.6 In terms of the space available to residents, the applicant notes that the Nationally Described Space Standards are not mandatory, and that Kirklees does not yet have policy which requires their use in new residential development. However, this proposal exceeds those requirements, as shown in the table below:

Floor	Apartment	Bedrooms	Size (sqm)	NDSS Requirement (sqm)	Difference (sqm)
Basement	1	1	42	37	+5
Basement	2	2	64	61	+3
Ground Floor	3	1	45	37	+8

Floor	Apartment	Bedrooms	Size (sqm)	NDSS Requirement (sqm)	Difference (sqm)
Ground Floor	4	1	42	37	+5
First Floor	5	1	46	37	+9
First Floor	6	1	47	37	+10
Second Floor	7	1	41	37	+4
Second Floor	8	2	62	61	+1

- 5.7 This proposal will deliver modern spaces that exceed space standards. It is noted that some mitigation is required to achieve acceptable internal noise levels at night, but this should be simple to achieve with the correct thought given to window design that reflects the importance of the fenestration to the character of the building and area.
- 5.8 It is concluded that this proposal will secure a more than satisfactory standard of amenity for future residents, and thus should be considered to be acceptable.

Highways and access issues

- 5.9 The site is in a highly accessible location, very close to both Batley Train Station and within walkable distance of bus stops and the town centre.
- 5.10 The site will not provide any car parking as it is expected that residents will either not own a car, or will park in the wider area. This maintains the current position, and is considered to be acceptable given the location of the site, the lower propensity for car ownership in this area, and the considerable public transport access available to any future residents at this site.
- 5.11 However, bike storage will be provided to the rear of the property. This will be secure and provided at a level which encourages cycle ownership for journeys that cannot be undertaken on foot.
- 5.12 The application is accompanied by a Transport Statement which analyses the established trip generation for offsetting purposes. It concludes that the proposed development would have a reduced travel demand compared to the existing / previous uses, and as such this application would represent an improvement over the current position.
- 5.13 The site will continue to be serviced as it is at present, with bins being stored to the rear of the property and refuse collections occurring from Spurr Street / Back Station Road.
- 5.14 This is considered to be a highly sustainable location where reduced car ownership is practical and deliverable. As a result, there will be no impact on highway capacity or safety, and; journeys will be undertaken by sustainable modes.

Drainage and Flood Risk

- 5.15 The site is in Flood Zone 1. The current site drainage regime will be maintained, which will ensure that there is no material change to the current position. As there are no works to “break ground” there is no potential to enhance attenuation as part of this development, but the proposal will ensure that flood risk in the wider area is not exacerbated.

Ecology

- 5.16 The site has no ecological designations and is heavily managed at the present time- such that it has little to no ecological interest. This application is not subject to BNG requirements as there is less than 25sqm of habitat on the site now, and so the “de minimis” exemption applies.
- 5.17 However, given the current state of repair of the building, and the remains of the adjacent building, there is potential for bats to use this site, which are considered in the submitted Preliminary Roost Assessment and Bat Emergence Survey reports.
- 5.18 These conclude that the site has low potential for use by bats, despite having damaged glazing and some gaps in stonework and around windows. Emergence surveys, undertaken at optimal times, recorded no evidence of bats using this building. Therefore, there is no ecological interest on this site.
- 5.19 It is therefore considered that ecology is not a material consideration for this application.

Ground Conditions

- 5.20 Given the past use of the site as a warehouse, the applicant has commissioned a Phase 1 ground conditions assessment. This concludes that there is a low risk of contamination and that the future residential use is acceptable.
- 5.21 Given the nature of the conversion works, the lack of likely contamination, and the practicalities and harm that would arise from intrusive works within the confines of a Listed Building, it is considered that the site is not contaminated to an extent that it could adversely affect the proposed development, and that not new pollutant linkages would be created as a result of this proposal.
- 5.22 On this basis, no further ground conditions work is considered to be necessary.

6. Benefits

6.1 The application offers a number of benefits which go beyond policy requirements. These weigh in favour of the application and add weight to our suggestion that it should be approved. These are:

- Contributing to housing need
- Finding an efficient use for an under-used, vacant brownfield land
- Climate Change benefits
- Socio-economic benefits- job creation, support to local businesses, construction jobs

Contributing to housing need

6.2 Recent revisions to NPPF have brought in a requirement to comply with the new “standard method”. Kirklees is now required to provide 1,840 homes per annum, compared to the previous requirement for 964 per annum. It is well documented that the current allocations in the Local Plan have under delivered, and this has promoted a review of the Local Plan at its first 5 year review. There is no current 5 Year Housing Land Supply, and the Housing Delivery test is not being met- with Kirklees providing 54% of the need and being a “presumption” authority.

6.3 There is a clear and pressing need for more housing delivery in Kirklees.

6.4 Providing additional living accommodation in a highly sustainable location, should be seen as a significant benefit in this wider context.

Re-use of un-used, vacant brownfield land

6.5 Re-using previously developed land is a requirement of national policy and reduces pressure to build on greenfield and Green Belt land.

6.6 NPPF suggests that substantial weight should be given to using brownfield land within settlements¹⁴, and that the development of under-utilised land and buildings should be promoted and supported.

6.7 Urban land recycling is both a national policy and political expectation. This is considered to weigh heavily in favour of the approval of this application.

Climate Change benefits

6.8 The re-use of historic buildings has considerable benefits for climate change, due to the embodied carbon retained in the existing building materials. Historic England’s “There’s no place like old homes”¹⁵ report confirms that “*When a typical historic building – the Victorian Terrace- is sympathetically refurbished and retrofitted, it will emit less carbon by 2050 than a*

¹⁴ NPPF 125 c)

¹⁵ [Re-use and Recycle to Reduce Carbon](#)

new building. But only if the whole life carbon of the building is considered.” and that “demolishing a historic building and replacing it with a new building can result in greater carbon emissions by 2050. If we reuse what is already here we can avoid carbon emissions”.

- 6.9 Re-using a building, like the application site, saved embodied carbon emissions and is more efficient overall than a new building. This approach accords with the climate emergency declaration declared by the Council in 2019. The carbon saved by re-using this building is a material benefit that weighs in favour of approval.

Socio-economic benefits

- 6.10 The proposed development will provide new houses and so will have little direct job creation benefit. However, it will support construction jobs, and the spend from future residents will help to support the town centre and local public transport provision.
- 6.11 The HBF Housing calculator estimates that 8 new homes will support the employment of 27 people, with 9 direct jobs, 4 indirect and 6 induced jobs. Whilst these are modest benefits, in the context of current chronic under-delivery and a lack of housing supply, these benefits should be weighed positively in favour of the application.

7. Conclusions

- 7.1 It is concluded that the proposed development accords with the provisions of the Development Plan. Other material considerations also suggest that the application should be approved.
- 7.2 Our analysis of the policy context has highlighted no issues which aren't capable of being dealt with by the imposition of suitable conditions. We consider that the application is compliant with the Development Plan.
- 7.3 We have not identified any material considerations which suggest that Planning Permission should be refused. We have, however, identified a number of benefits that weigh heavily in favour of the application. These are:
- Contributing to housing need
 - Finding an efficient use for an under-used, vacant brownfield land
 - Climate Change benefits
 - Socio-economic benefits- support to local businesses, construction jobs
- 7.4 The proposed development is considered to be sustainable development, as defined in the NPPF, and will contribute to all three overarching objectives¹⁶ by:
- Offering economic benefits, through job creation and GVA;
 - Securing social objectives by providing access to good quality housing in a context of considerable need and in an area which is relatively deprived;
- and
- Securing environmental benefits through maintaining a heritage asset, visual improvements, and concentrating the need for journeys in a highly sustainable location.
- 7.5 We consider that the presumption in favour of sustainable development applies in this case. In line with NPPF 11c), we conclude that planning permission should be granted "*without delay*".
- 7.6 We also conclude that the presumption inherent in S38(6) of the Planning Act applies in this case. The development accords with the adopted Development Plan and no material considerations have been identified that suggest refusal. Indeed, we have identified a number of material benefits which suggest that the balance clearly lies in favour of granting this application.

¹⁶ Para 8 NPPF

7.7 We, therefore, ask that this application be approved in a timely manner to ensure that its inherent benefits can be realised.