

Five-Year Housing Land Supply Assessment – Kirklees Council.

Land Paddock Road /Moor Lane, Kirkburton, Huddersfield.

On behalf of Persimmon Homes.

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Contents.

Executive Summary	1
1. Introduction.....	2
2. Policy Context	3
The Local Plan.....	3
National Policy and Guidance.....	3
National Planning Policy Framework	3
National Planning Practice Guidance	5
Relevant Appeals	6
3. Delivery	8
4. Kirklees Position	9
Authority Monitoring Report 2024/25	9
Housing Requirement	9
Supply	11
Deliverable Supply	11
5. Conclusions	13

Executive Summary

This report provides a critical assessment of Kirklees Council's five-year housing land supply position on behalf of Persimmon Homes in relation to land at Paddock Road / Moor Lane, Kirkburton.

It concludes that the Council's latest published position is not supported by adequate site-specific evidence and does not demonstrate a five-year supply of deliverable housing land. Applying the most recent local housing need figure and the required 20% buffer produces a five-year requirement of 11,562 dwellings. According to the available evidence, Kirklees' deliverable supply is between 0 and 3.99 years, resulting in a shortfall of between 2,332 and 11,562 dwellings.

Based upon the available information the report therefore concludes that the presumption in favour of sustainable development is engaged and that very significant weight should be afforded to proposals capable of delivering much-needed housing.

1. Introduction

- 1.1. Pegasus Group have been commissioned by Persimmon Homes to prepare an assessment of the housing land supply position within the administrative area of Kirklees Council. This report provides a critical overview of the Council's five-year housing land supply position. Including the following elements:
 - Identification of relevant five-year housing requirement,
 - Consideration of the robustness of all sources of supply, and
 - Identification of the housing land supply position within Kirklees.
- 1.2. The Council's most recent assessment of its housing land supply is contained within the Council's 'Authority Monitoring Report 2024/2025' (AMR) published in December 2025. The AMR concludes that the Council has a **4.18-year supply** of deliverable housing land. However, the AMR does not provide any details upon the base date of the supply or its calculations in relation to the relevant housing requirement or the deliverable supply of sites for the five-year period.
- 1.3. The lack of clarity upon these issues is contrary to paragraph 78 of the NPPF which states:

*"Local planning authorities should identify and **update annually a supply of specific deliverable sites** sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old ". (our emphasis)*
- 1.4. Pegasus Group has sought to source this information via a Freedom of Information (Fol) request from the Council. However, at the time of writing the Council refused this request.

2. Policy Context

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

The Local Plan

- 2.2. The adopted development plan comprises the Kirklees Local Plan. This is made up of two documents. These being:

- Local Plan Strategy and Policies, adopted 27 February 2019
- Local Plan Allocations and Designations, adopted 27 February 2019

- 2.3. The housing requirement is set out within the spatial development strategy, which states a minimum housing requirement of 31,140 dwellings over the plan period 2013 to 2031, this is at an average rate of 1,730 dwellings per annum (dpa). Development is proposed to be concentrated in the urban areas of Huddersfield and Dewsbury. Other settlements across Kirklees are also anticipated to deliver additional housing. The settlement of Kirkburton / Highburton was identified to deliver 95 homes over the plan period. This figure was based upon the capacity of the allocations rather than an assessment of need at the settlement level.

Emerging Local Plan

- 2.4. Work on the Kirklees Local Plan update commenced in November 2023 following a review of the 2019 Kirklees Local Plan, where it was determined that the plan, including its housing requirement, was out of date.
- 2.5. Engagement on the emerging local plan has included a 'Call for Sites' exercise and an 'Early Engagement' consultation in late 2024 to early 2025. Following the publication of the new plan-making regulations on 25th March 2026, the Council has identified that it will commence a new plan under this system, suggesting they will publish a notice of intention to commence Local Plan preparation in July 2026.

National Policy and Guidance

- 2.6. Following the submission of the Kirklees Local Plan for examination, the National Planning Policy Framework (NPPF) has been updated. This most recent version of the NPPF was published in December 2024. Unless stated otherwise all further references to the NPPF relate to the most recent revised draft of the NPPF December 2024 version.

National Planning Policy Framework

- 2.7. Paragraph 7 of the NPPF identifies that the purpose of the planning system is to contribute to the achievement of sustainable development, the objective of which is to meet the needs of the present without compromising the ability of future generations to meet their own needs. Paragraph 8 identifies that this is to be achieved through three overarching objectives which are to be pursued in mutually supportive ways one of which is a social

objective which requires that there are a sufficient number and range of homes to meet the needs of present and future generations.

- 2.8. Paragraph 11 identifies that plans and decisions should apply a presumption in favour of sustainable development. For decision-making, this means that where the policies which are most important for determining the application are out-of-date, permission should be granted unless:
 - i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 2.9. In relation to (i) above NPPF footnote 7 identifies that that the assets of particular importance are those relating to habitats sites and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.
- 2.10. Paragraph 33 requires that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take account of relevant market signals.
- 2.11. Paragraph 61 sets out the Government's objective of significantly boosting the supply of homes. Recognising that it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 2.12. Paragraph 78 places a requirement upon local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old, unless they have been reviewed and found not to require updating (footnote 39).
- 2.13. The five-years' worth of housing must also include a buffer of either 5% or 20%. A 20% buffer is currently only required in cases where there has been significant under-delivery of housing (measured against the Housing Delivery Test) over the previous three years.
- 2.14. The NPPF Annex B: Glossary confirms that to be considered deliverable;
"...sites for housing or other pitches and plots should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that homes will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”
(our emphasis)

- 2.15. This definition of deliverable supersedes earlier versions of the NPPF and was effective upon its publication. The following assessment of the deliverable supply within Kirklees is solely against this definition.

National Planning Practice Guidance

- 2.16. First published in March 2014, the National Planning Practice Guidance (PPG) supplements the NPPF in that it provides guidance upon the application of national planning policy. The PPG is a material consideration in the determination of planning applications and appeals.
- 2.17. Section 68 of the PPG deals with housing supply and delivery. It identifies that the purpose of the five-year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next five-years. Where strategic policies are more than five years old or have been reviewed and found in need of updating, local housing need calculated using the standard method should be used in place of the housing requirement. (ID: 68-003-20190722). **The requirement to use the standard method applies in the case of Kirklees,** due to the fact the current local plan was adopted more than five-years ago.
- 2.18. The PPG provides guidance as to what constitutes a ‘deliverable’ housing site and requires clear evidence for major sites without detailed permission to be included within the assessment (ID: 68-007-20190722). This places far greater emphasis upon the Council to provide robust evidence regarding housing delivery from such sources.
- 2.19. The PPG (ID 68-007-20190722) provides guidance upon what may constitute clear evidence, this includes:
- current planning status – including progress towards approved reserved matters or a planning performance agreement setting timescales for approval of reserved matters and discharge of conditions,
 - firm progress towards submission of an application – such as written agreement between the local planning authority and site developer in relation to anticipated start and build-out rates,
 - firm progress with site assessment work, and
 - clear information relating to viability, ownership constraints or infrastructure provision – such as successful participation in bids for large-scale infrastructure.

- 2.20. In decision-taking, the PPG (ID: 68-008-20190722) advises that where an authority cannot demonstrate a five-year housing land supply, including the appropriate buffer, the presumption in favour of sustainable development as set out in paragraph 11d of the NPPF is applied.

Relevant Appeals

- 2.21. There are numerous appeals in relation to housing land supply. Whilst these decisions are all made based upon the specifics of each case, several key themes can be identified.
- 2.22. In relation to clear evidence, this relates to the NPPF requirement for major sites without detailed planning permission to be available and suitable now (the base date of the assessment) and provide clear evidence of delivery in the five-year period. In considering Part B sites (as described in the definition of Deliverable in Annex 2 of the NPPF), the Secretary of State (SoS) provided useful guidance in a recovered appeal on land off Audlem Road/Broad Lane, Stapeley, Nantwich (APP/RO660/A/13/2197532 & APP/RO660/A/13/2197529). Within paragraph 21 of this decision the SoS considers that:

"...the following should be removed from the supply: sites with outline planning permission which had no reserved matters applications and no evidence of a written agreement; a site where there is no application and the written agreement indicates an application submission date of August 2019 which has not been forthcoming, with no other evidence of progress; and a site where the agent in control of the site disputes deliverability..."

- 2.23. Numerous Inspectors have also grappled with the issue of what constitutes clear evidence for part B sites. In the case of Land at Caddywell Lane/Burwood Lane, Great Torrington, Devon (APP/W1145/W/19/3238460, **Appendix 2**) this was eloquently expressed by the Inspector Harold Stephens who noted (paragraph 56 and 57):

"This indicates the expectation that 'clear evidence' must be something cogent, as opposed to simply mere assertions. There must be strong evidence that a given site will in reality deliver housing in the timescale and in the numbers contended by the party concerned.

Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are the planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed.

Securing an email or completed pro-forma from a developer or agent does not in itself constitute 'clear evidence'. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward."

- 2.24. In the appeal decision on land south of Hamstreet Road, Hamstreet (APP/E2205/W/25/3360094, **Appendix 3**) the Inspector found that:

- allocated sites without a planning application are not deliverable (para 48, 49)
- allocated site with a pending full application which was subject to objections from statutory consultees was not deliverable (para 50).

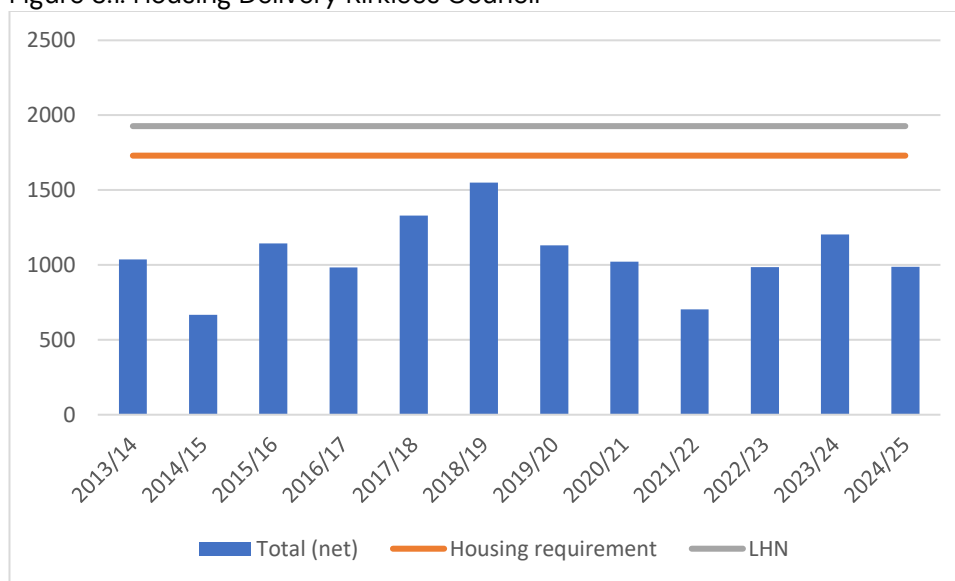


- Sites with resolution to grant outline permission were not deliverable (paras 52, 53, 54).
- Site with outline permission but without a Reserved Matters application was not deliverable (para 56).

3. Delivery

- 3.1. Figure 3.1 below identifies delivery against the Kirklees Local Plan housing requirement, 1,730 dpa. As can be seen, the Council has failed to meet its Local Plan housing requirement in any year over the plan period to date. Indeed, average completions over the period 2013/14 to 2024/25 is just 1,062dpa. This represents just 61% of the housing requirement to date.

Figure 3.1: Housing Delivery Kirklees Council



Source: AMRs

- 3.2. Figure 3.1 also identifies the 2026 LHN for Kirklees as calculated using the standard method introduced in December 2024. Until 2024, this is provided for illustrative purposes only as prior to this date it was not in effect as the Local Plan housing requirement remained up to date. However, since 2024 the delivery has been measured against the LHN. Over the last two years only circa 57% of the current LHN has been delivered.
- 3.3. Based upon the analysis above, delivery against the relevant housing requirements has been extremely poor. As discussed in section 4 below, this is mirrored in the results of the 2023 Housing Delivery Test (HDT) which indicates delivery of just 54% of its housing requirement over the preceding 3 years. Given the poor delivery since the publication of the 2023 HDT, this is unlikely to improve in the foreseeable future.
- 3.4. Due to the Council's failure to deliver against its requirements for the HDT it has been required to provide action plans. To date these have had little meaningful effect in boosting the supply of homes in Kirklees.

4. Kirklees Position

- 4.1. This section considers the current five-year housing land supply position identified by Kirklees. It should be noted that through an FOI request Pegasus Group requested that the Council provide detailed site-specific information in relation to its housing land supply. The Council refused to provide this information citing the following reasons:

"The Council's current housing land supply position is set out in the latest Authority Monitoring Report 2024/25 (December 2025). The Council do not publish a list of sites that make up this position. Release of this information into the public domain may adversely affect the interests of those who provided the information, namely those landowners who have advised the Local Planning Authority that they are considering development of their land in the near future. Release of this information may adversely impact any current or future arrangements they have in place for the land, for example if it is leased to a third party or there are plans to lease the land prior to development. This includes where the land is in the ownership of the Council. In addition to this, awareness of potential developments, where details of the development have not yet been finalised, may cause unwarranted stress to local residents, and users of the land (such as tenants).

For these reasons stated, the Council applies the following exemptions under EIR and FOI:

- *Regulation 12(5)(f) of EIR*
- *Section 43 of FOI Regulations"*

- 4.2. This reason has been disputed but at the time of writing no further details have been provided by the Council. The remainder of this response therefore relies upon the current position of the Council. However, if further information is provided the applicant reserves the right to update this statement.

Authority Monitoring Report 2024/25

- 4.3. The AMR provides very limited information in relation to the five-year supply of deliverable sites. Indeed, there are just four short paragraphs and no supporting evidence in relation to the sites which make up the housing land supply. The final paragraph simply states that:

"The assessment of the required housing within the five-year period (using the standard method calculation and incorporating a 20% buffer) compared to the deliverable housing capacity shows the current land supply position in Kirklees is 4.18 years."

- 4.4. The AMR identifies that this is based upon an LHN of 1,840dpa and a 20% buffer. Whilst no supply figure is identified it can be assumed by the Council's 4.18-year figure that this is based upon a 'deliverable' supply of 9,230 dwellings. Again, whilst not stated, it is assumed that this figure is based upon a base date of 1st April 2025.

Housing Requirement

- 4.5. The Council's supply figure is based upon an LHN of 1,840dpa, plus a 20% buffer. This provides a five-year requirement of 11,040 dwellings.

- 4.6. The LHN calculation was updated in May 2026, following the publication of the updated housing stock figures for 2025. Based upon this update the most recent LHN figure is 1,927dpa, an increase of 87dpa compared to the Council's figure.
- 4.7. The PPG (ID: 2a-004) is clear that the LHN should be calculated using the most recent data available. This is the basis for our calculation. The use of the most recent available data, irrespective of the base date of the assessment, is a common approach in most appeals where this is disputed between the parties. This includes the recent appeal at land to the west of Brackley, Brackley¹. In this case, paragraph 46 the Inspector notes:
- "The PPG Housing and Economic Needs Assessment section states that the standard method is to be calculated using the most recent data published at the time. In this context, I consider that the Appellants have adopted the correct approach in the calculation of LHN."*
- 4.8. In terms of the application of a 20% buffer, this is considered appropriate. The latest HDT results were published in December 2024 and have not yet been updated. These results identify that Kirklees only delivered 54% of its HDT requirement.
- 4.9. Due to the HDT result² the presumption in favour of sustainable development is engaged, irrespective of the five-year supply position. However, a 20% buffer is also required to be applied to the five-year supply.
- 4.10. Pegasus analysis, based upon delivery in 2024 and 2025, indicates that the next iteration of the HDT will see a marginal increase in Kirklees position to 62%, however even with this minor improvement the presumption in favour of sustainable development will remain engaged, as will the need to include a 20% buffer to the housing requirement.
- 4.11. Taking account of the increase to the LHN the five-year requirement, inclusive of a 20% buffer, increases to 11,562 dwellings, as set out in Table 4.1 below. This is an increase of 522 dwellings over the five-year period.

Table 4.1: Kirklees 5-year housing requirement

Element	Dwellings
Housing Requirement	1,927
Five-years LHN	9,635
Buffer (20%)	1,927
Total	11,562

¹ APP/W2845/W/25/3367158

² NPPF footnote 8

Supply

- 4.12. As discussed within section 2 of this report, Paragraph 78 of the NPPF, places a requirement upon local authorities to identify and update annually **a supply of specific deliverable sites** sufficient to provide a minimum of five years' worth of housing, in this case against the LHN. The Council's AMR provides no information upon which sites make up its deliverable housing land supply, the status of the sites making up the supply, or the quantum of housing each site contributes to the supply. The Council has therefore clearly failed to comply with national policy in this regard and at the time of writing continues to fail following its refusal to release the data following our Fol request.
- 4.13. The AMR does state that:
- "National planning policy requires local planning authorities to demonstrate five years supply of specific deliverable housing sites against their housing requirement. This includes consideration of sites with full planning permission **as well as sites with outline permission or allocated in the Local Plan** where there is clear evidence to justify their inclusion in the supply"* (our emphasis).
- 4.14. This suggests that not all sites within the supply benefit from detailed permission. Any major sites falling within this category would be classed as 'part b' sites under the NPPF definition of a deliverable site. As discussed in section 2, the inclusion of such sites requires clear evidence from the Council that these sites will deliver in a five-year period. The failure to provide such evidence would, in accordance with all appeal and Secretary of State decisions known to Pegasus Group, mean that these sites cannot be considered deliverable.
- 4.15. On this basis, the Council's supply of deliverable housing will be below 9,230 dwellings. The extent of this additional shortfall is currently unknown.

Deliverable Supply

- 4.16. Based upon the analysis above and the lack of evidence provided by the Council, the deliverable housing land supply position within Kirklees is currently between 0 and 3.99–years. Unless the Council provides evidence of its supply it can currently only be concluded that it stands at **0 years**. However, should the Council provide evidence that all its claimed supply is deliverable this would rise to **3.99 years**. Taking this unlikely best-case scenario creates a minimum shortfall of 2,332 dwellings over the five-year period. However, it is likely to be much greater.

Table 4.2: Five-year deliverable housing Land Supply

Element	Maximum Deliverable Supply	Minimum Deliverable Supply
5-year requirement including buffer	11,562	
Deliverable Supply	9,230	0
Years of Housing Supply	3.99	0



Shortfall against identified 5-year requirement	2,332	11,562
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5. Conclusions

- 5.1. The Council has failed to comply with the requirements set out within paragraph 78 of the NPPF. Despite its assertion that it can demonstrate a 4.18-year supply this is not supported by any published evidence. Based upon the lack of evidence for the deliverable supply the Council effectively currently has a **0 year supply of deliverable sites**.
- 5.2. Our analysis identifies that the Council's calculation of the LHN is now out of date and the most recent LHN calculation identifies a minimum requirement of 1,927dpa. This increases the five-year supply requirement to 11,562 dwellings. Therefore, even if the Council can evidence that the 9,230 dwellings suggested are deliverable the deliverable supply would still only be **3.99 years**.
- 5.3. Kirklees' five-year housing land supply deficit is between 2,332 and 11,562 dwellings. Although the range is wide, the shortfall is substantial at any point in the range and requires remedial action to deliver the homes urgently needed in Kirklees. Something which the actions identified in the various HDT Action Plans produced by the Council have failed to achieve to date.
- 5.4. In addition, our evidence indicates that the Council will also once again fail the 2025 HDT. This, allied to the significant under-delivery to date, lack of meaningful progress upon the new local plan and lack of evidence in relation to deliverable sites, means that the situation is unlikely to improve significantly in the foreseeable future. Given these circumstances the Council should provide very significant weight to proposals, such as the proposal at land off Paddock Road/Moor Lane, which are delivering much needed housing.
- 5.5. This weight is in accordance with the weight afforded to the provision of housing by the Secretary of State in the context of sub-five year housing land supply positions as set out in Table 5.1 below. The analysis identifies that the Secretary of State has consistently found that where an LPA is able to demonstrate less than a 4.5-years supply the provision of housing should be afforded either significant, substantial, very significant or very substantial weight. It should be recognised that the current supply position in Kirklees is at best just 3.99 years but is likely to be significantly lower.

Table 5.1: Weight afforded to the provision of housing by the Secretary of State

Decision	Weight afforded	FYHLS position
Land to the West of Burley-in-Wharfedale at Sun Lane and Ilkley Road (ref: 3208020)	Very substantial weight	Less than 2.06 years
160 Stanley Road, Stockport (ref: 3205559)	Very significant weight	2.8 years
Land at and adjacent to Hulton Park, Bolton (ref: 3208426)	Significant weight	3.5 to 3.7 years
Land North of Viaduct, Ledbury (ref: 3244410)	Substantial weight	4.22 years
Land at Fiddington, Tewkesbury (ref: 3210903)	Substantial weight	4.33 years

Decision	Weight afforded	FYHLS position
Land at Mitchelswood Farm, East Sussex (ref: 3119171)	Significant weight	4.5 years
Land at Hawthorns, Farnham (ref: 3211033)	Significant weight	4.5 years
Land at South West Sittingbourne/Wises Lane, Sittingbourne (ref: 3233606)	Significant weight ³	4.6 years
97 Barbrook Lane, Tiptree, Colchester (ref: 3223010)	Significant weight	4.7 years
Land at Sandown Park Racecourse, Esher (ref: 3249790)	Significant weight	Less than five years
Whitehouse Farm, Belper (ref: 3198996)	Significant weight	3.7 to 6.6 years
North London Business Park, London (ref: 3189843)	Significant weight	4.8 to 5.1 years

5.6. Table 5.2 below identifies that, irrespective of the five-year supply position, the Secretary of State places significant weight upon the delivery of housing. This is largely due to the scale of the housing crisis this country currently finds itself within.

Table 5.2: Weight afforded to housing delivery by Secretary of State, irrespective of FYHLS

Decision	Weight afforded	FYHLS position
Land West of Knights Hill Village (ref: 3237042)	Substantial weight	In excess of 5 years
Oxford Brookes University, Wheatley Campus (ref: 3230827)	Very substantial weight ⁴	In excess of 5 years
Land at Love Lane, Woolwich (ref: 3233519)	Substantial weight	In excess of 5 years
Land at VIP Trading Estate, London (ref: 3233585)	Significant weight	In excess of 5 years
Land to the East of Newport Road and to the East and West of Cranfield Road, Woburn Sands (ref: 3169314)	Significant weight	In excess of 5 years

³ Notwithstanding the absence of a policy-compliant level of affordable housing.

⁴ In light of the affordable housing shortfall in that case.

Land at Former Westferry Printworks Site, London (ref: 3225474)	Significant weight	In excess of 5 years
Land at Burgess Business Park, London (ref: 3225548)	Moderate weight ⁵	In excess of 5 years
Land off Station Road, Long Melford (ref: 3214377)	Significant weight	5.67 years
Anglia Square, Norwich (ref: 3225505)	Significant weight	5.89 years
Land off Audlem Road/Broad Lane, Stapeley (ref: 2197532) (CD 7.4)	Significant weight	5.7 to 6.6 years
Land at Sandleford Park, Newbury (3265460)	Significant weight	7.67 years

⁵ Owing to the less than exemplary nature of the accommodation proposed.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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