



Sustainability Statement

Land to the East of Leeds Road, Chidswell

Presented to **C.C. Projects.**

Issued: March 2019

Delta-Simons Project No. 18-0865.06





Delta-Simons Environmental Consultants Limited
Head Office: 3 Henley Office Park, Doddington Road, Lincoln, LN6 3QR
Tel: 01522 882555 | www.deltasimons.com



Report Details

Client	C.C. Projects.
Report Title	Sustainability Statement
Site Address	Land to the East of Leeds Road, Chidswell
Project No.	18-0865.06
Delta-Simons Contact	Rob Molyneux (rob.molyneux@deltasimons.com)

Quality Assurance

Issue No.	Status	Issue Date	Comments	Author	Review	Authorised
4	Final	9 th March 2020	Client Comments Incorporated			
				Dan Ellis Principal Consultant	Rob Molyneux Unit Director	Rob Molyneux Unit Director

About us

Delta-Simons is a trusted, multidisciplinary environmental consultancy, focused on delivering the best possible project outcomes for customers.

Specialising in Environment, Health & Safety and Sustainability, Delta-Simons provide support and advice within the property development, asset management, corporate and industrial markets. Operating from ten locations - Lincoln, Birmingham, Bristol, Dublin, Leeds, London, Manchester, Newcastle, Norwich and Nottingham - we employ over 100 environmental professionals, bringing experience from across the private consultancy and public sector markets.

Delta-Simons is proud to be a founder member of the Inogen® Environmental Alliance, a global corporation providing multinational organisations with consistent, high quality and cost effective environmental, health, safety, energy and sustainability solutions. Inogen assists multinational clients by resolving liabilities from the past, addressing today's requirements and delivering solutions for the future. With more than 200 offices located on every continent, more than 6,430 staff worldwide, and projects completed in more than 120 countries, Inogen provides a single point of contact for diverse markets as Automotive, Chemical, Consumer Products & Retail, Financial, Food & Beverage, Healthcare, Insurance, Manufacturing, Non Profit Organisations, Oil & Gas, Real Estate, Services Firms, Technology and Transportation, among others.

Table of Contents

- 1.0 INTRODUCTION1
 - 1.1 Context1
 - 1.2 Purpose1
 - 1.3 Scope.....2
 - 1.4 Proposed Development2
- 2.0 NATIONAL PLANNING POLICY3
 - 2.1 National Planning Policy Framework (NPPF).....3
- 3.0 LOCAL PLANNING POLICY.....5
 - 3.1 Kirklees Local Plan Strategy and Policies (2019).....5
 - 3.1.1 Policy LP1 – Presumption in Favour of Sustainable Development5
 - 3.1.2 Policy LP3 – Location of New Development.....5
 - 3.1.3 Policy LP7 – Efficient and Effective Use of Land and Buildings6
 - 3.1.4 Policy LP19 – Strategic Transport Infrastructure6
 - 3.1.5 Policy LP20 – Sustainable Travel.....7
 - 3.1.6 Policy LP21 – Highways and Access7
 - 3.1.7 Policy LP26 – Renewables and Low Carbon Energy8
 - 3.1.8 Policy LP27 – Flood Risk.....8
 - 3.1.9 Policy LP35 – Historic Environment.....9
 - 3.1.10 Policy LP43 – Waste Management Hierarchy10
 - 3.1.11 Policy LP51 – Protection and Improvement of Local Air Quality10
 - 3.1.12 Policy LP52 – Protection and Improvement of Environmental Quality10
- 4.0 SUSTAINABILITY STATEMENT.....12
 - 4.1 General12
 - 4.2 Efficient and Effective Use of Land and Buildings.....12
 - 4.3 Energy Efficiency12
 - 4.4 Sustainable Transport13
 - 4.5 Waste Management14
 - 4.6 Materials Sourcing and Recycling15
 - 4.7 Built Heritage and Archaeology15
 - 4.8 Flood Risk.....15
 - 4.9 Land Use and Ecology15
 - 4.10 Pollution16
 - 4.10.1 Air Quality16
 - 4.10.2 Odour.....16
- 5.0 CONCLUSIONS17

Appendices

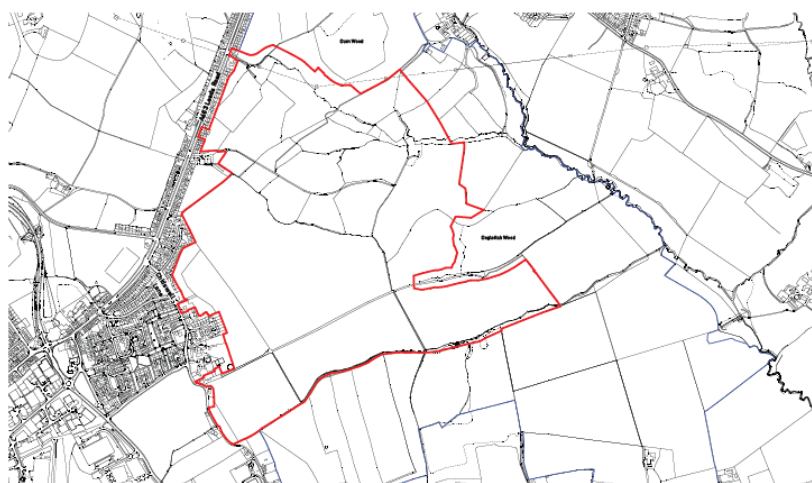
- Appendix A Data Sources
- Appendix B Limitations

1.0 Introduction

1.1 Context

Delta-Simons Environmental Consultants Ltd ('Delta-Simons') was instructed by C.C. Projects. (the 'Client') to undertake a Sustainability Statement for the Proposed Development on the land to the East of Leeds Road, Chidswell (the 'Site'). A Site Location Plan is presented as Figure 1. The Site covers an area of approximately 112 hectares, which is wholly within the administrative boundary of Kirklees Council.

Figure 1 – Site Location Plan



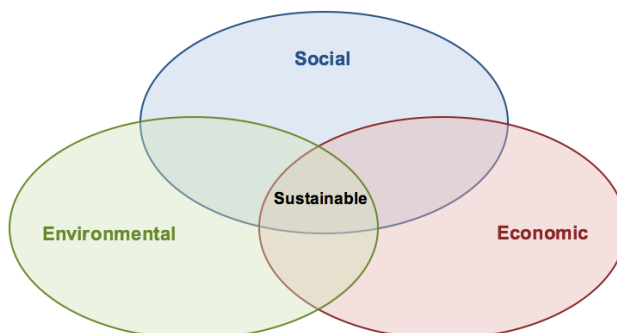
It is proposed that the development will be mixed-use, consisting of 1,354 dwellings, 35 hectares of employment development, a primary school, local centre, green space, access and other associated infrastructure ('the Proposed Development').

This report outlines the details of the proposed scheme prior to highlighting how the principles of sustainable development have been incorporated into the design, with the aim of addressing sustainability related criteria of the *National Planning Policy Framework (NPPF)*, *Kirklees Council Policy*, and any relevant supplementary planning guidance.

1.2 Purpose

According to the Brundland Commission, of the United Nations, a sustainable development is "*the development that meets the needs of the present without compromising the ability of the future generations to meet their own needs*". This requires the reconciliation of social, environmental, and economic demands – the "three pillars" of sustainability.

Figure 2 – The Three Pillars of Sustainability



The primary purpose of this Sustainability Statement is to demonstrate how the Proposed Development has responded to relevant national and regional sustainability policies. The National Planning Policy Framework (NPPF) states that “*Plans and decisions should apply a presumption in favour of sustainable development*”.

1.3 Scope

The scope of the Sustainability Statement is based on national and local planning policies and strategies that address sustainability, as outlined further in Section 2.0 and Section 3.0.

The Statement provides an account of how the project team have considered and implemented sustainable design throughout development. Based on a review of national and local planning policy (see Section 2.0 and 3.0), the Sustainability Statement has been structured to address how sustainability practises have been incorporated into the development. Section 4.0 provides evidence on how the Proposed Development intends to meet the aspects of planning policy outlined above.

1.4 Proposed Development

The Proposed Development consists of a mixed-use development of 1,354 dwellings, 35 hectares of employment development, a primary school, local centre, green space, access and other associated infrastructure. The extent of the planning application boundary covers an area approximately 112 hectares.

Made as ‘outline’ planning application, the Proposed Development aims to allow for:

- ▲ An appropriate range and mix of housing to meet local needs and respond to market requirements, to be developed on Site;
- ▲ Employment space to be created to include a range of larger and smaller scale opportunities, providing the flexibility to respond to local and national requirements attracted by good accessibility to the M1 and M62 strategic road network;
- ▲ Promote a sustainable community with access to school facilities and a local centre on Site to serve the new community and existing residents;
- ▲ Retention of key woodland blocks (Dum Wood and Dogloitch Wood) and promotion of green fingers throughout the Site to promote walkable and cycle friendly neighbourhoods with a hierarchy of easy to navigate routes connecting neighbourhoods, spaces and employment uses; and
- ▲ Provision of multiple vehicular access points to ensure effective connectivity with the strategic transport network for cars and public transport.

Additional features of and activities related to the Proposed Development are expected to include:

- ▲ The re-grading of land to create development platforms for buildings;
- ▲ Where necessary to facilitate development, the removal of existing trees and replanting of new trees with an expected overall neutral effect on tree numbers, and an aspiration to provide a net gain in tree numbers;
- ▲ Introduction of drainage infrastructure and potential sustainable urban drainage system (SUDS) features; and
- ▲ Associated hard and soft landscaping.

2.0 National Planning Policy

The relevant planning and dedicated sustainability policy documents that promote themes of sustainable development have been summarised below. The following policies are applicable to the proposed Site and form the basis of Delta-Simons' Sustainability Statement.

2.1 National Planning Policy Framework (NPPF)

In February 2019, the Government published the National Planning Policy Framework (NPPF) which superseded a number of planning policies including the previous National Planning Policy Framework published in March 2012 and revised in July 2018.

The NPPF was updated to reflect a minor amendment in June 2019.

The NPPF outlines the Government's planning policies for England. It provides a framework within which local people and accountable councils can produce their own distinctive local plan which reflect the needs and priorities of their neighbourhoods and communities. The purpose of the NPPF is to contribute to the achievement of sustainable development.

The NPPF aims to strengthen local decision making as a way to foster the delivery of sustainable developments. However, the NPPF also outlines that sustainable developments require careful attention to viability and costs in plan-making and decision-taking processes. Over everything else, plans should be deliverable. Therefore, the sites and scale of development within the plan should not be subjected to large scale obligations and burdens, so that their ability to be developed viably is threatened.

The NPPF guidance promotes planning for climate change. Chapter 14 of the NPPF, Meeting the Challenge of Climate Change, Flooding and Coastal Change (paragraphs 149 to 154) state that:

Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

- ▲ New development should be planned for in ways that:
 - ▲ Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
 - ▲ Can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.
- ▲ To help increase the use and supply of renewable and low carbon energy and heat, plans should:
 - ▲ Provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
 - ▲ Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
 - ▲ Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.
- ▲ Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning;

- ▲ In determining planning applications, local planning authorities should expect new development to;
 - ▲ Comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
 - ▲ Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- ▲ When determining planning applications for renewable and low carbon development, local planning authorities should:
 - ▲ Not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
 - ▲ Approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

3.0 Local Planning Policy

The current existing local policy that is used to determine planning applications consists of the following documents:

- ▲ Kirklees Local Plan Strategy and Policies (2019)

3.1 Kirklees Local Plan Strategy and Policies (2019)

The following text included within Section 3.1.1 through 3.1.12 are taken verbatim from the above document.

3.1.1 Policy LP1 – Presumption in Favour of 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 council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Proposals that accord with the policies in the Kirklees Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the proposal or relevant policies are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise – taking into account whether:

- ▲ Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- ▲ Specific policies in that Framework indicate that development should be restricted.

3.1.2 Policy LP3 – Location of New Development

Development proposals will be required to reflect the Spatial Development Strategy, Policy LP1 Presumption in Favour of Sustainable Development and Policy LP2 Place Shaping. This means:

- ▲ Development should reflect:
 - ▲ The settlement's size and function;
 - ▲ Place shaping strengths, opportunities and challenges for growth;
 - ▲ Spatial priorities for urban renaissance and regeneration; and
 - ▲ The need to provide for new homes and jobs;
- ▲ Development will be permitted where it supports the delivery of housing and employment growth in a sustainable way, taking account of the following criteria:
 - ▲ Delivering the housing and job requirements set out in the Local Plan;
 - ▲ The need to maintain a supply of specific deliverable sites, in accordance with national policy and enabling the delivery of allocations set out in the Local Plan or in Neighbourhood Plans;
 - ▲ Ensuring that opportunities for development on brownfield (previously developed) sites are realised early in the plan, subject to maintaining a five-year supply of housing land and to delivering the overall housing and jobs requirements;
 - ▲ Ensuring delivery of housing and jobs in smaller settlements to meet local housing and employment needs;
 - ▲ Ensuring that proposals have regard to connecting links to existing green and blue infrastructure networks;
 - ▲ Co-ordinating housing and employment land delivery with the provision of new infrastructure; and

- ▲ Providing access to a range of transport choices and access to local services.

3.1.3 Policy LP7 – Efficient and Effective Use of Land and Buildings

To ensure the best use of land and buildings, proposals:

- ▲ Should encourage the efficient use of previously developed land in sustainable locations provided that it is not of high environmental value;
- ▲ Should encourage the reuse or adaptation of vacant or underused properties;
- ▲ Should give priority to despoiled, degraded, derelict and contaminated land provided that it is not of high environmental value; and
- ▲ Will allow for access to adjoining undeveloped land so it may subsequently be developed.

Housing density should ensure efficient use of land, in keeping with the character of the area and the design of the scheme:

- ▲ Developments should achieve a net density of at least 35 dwellings per hectare, where appropriate;
- ▲ Higher densities will be sought in principal town centres and in areas close to public transport interchanges;
- ▲ Lower densities will only be acceptable if it is demonstrated that this is necessary to ensure the development is compatible with its surroundings, development viability would be compromised, or to secure particular house types to meet local housing needs; and
- ▲ More detailed density requirements may be set out in area actions plans, neighbourhood plans, supplementary planning documents and development briefs, where appropriate.

3.1.4 Policy LP19 – Strategic Transport Infrastructure

The ability to move goods and people is particularly important given the district's strategic position on the national motorway and rail networks, its links with regional facilities such as airports/ports and its central position between the Leeds, Sheffield and Manchester City regions. This gives the district a distinct locational advantage. Efficient access for goods and services is also a key factor in supporting the vitality of urban areas. The aim is to achieve a balanced and integrated transport network which makes the most efficient and effective use of road, rail and public transport.

The Council is committed to ensuring that new developments have safe and convenient access to the West Yorkshire Key Route Network where possible, the main arterial routes and the West Yorkshire Core Bus Network that connect the region. Development will be strategically placed along core networks where available and the developing core cycle network, all of which will be improved and maintained where possible to reduce congestion and reliance on the private car;

Proposals will be encouraged where they assist to bring forward strategic transport infrastructure where possible, particularly where they would directly benefit from these schemes;

Proposals that may prejudice the future development of the following will not be permitted:

- ▲ Strategic transport infrastructure;
- ▲ Identified highway improvements;
- ▲ Traffic management schemes;
- ▲ Proposed public transport facilities, including the improvement of existing rail stations and rail corridors and walking and cycling infrastructure; and
- ▲ Strategic cross boundary schemes.

National, regional and local transport schemes are identified on the Policies Map and listed below:

- ▲ TS1 A62/A644 Huddersfield to M62 J25;
- ▲ TS2 New Motorway junction 24a on M62;

- ▲ TS3 Huddersfield Southern Gateways;
- ▲ TS4 A629 Halifax Road (Huddersfield to Halifax Corridor);
- ▲ TS5 Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone;
- ▲ TS6 Highway Network Efficiency Programme;
- ▲ TS7 Public Transport Improvement Schemes;
- ▲ TS8 Walking and Cycling Improvement Schemes; and
- ▲ TS9 Strategic Road Network Improvements.

The Council will safeguard land to ensure these schemes can be delivered. Detailed transport schemes that require planning permission will have regard to the constraints and considerations as set out in Local Plan such as impact on designated heritage assets and any other environmental impacts.

3.1.5 Policy LP20 – Sustainable Travel

New development will be located in accordance with the spatial development strategy to ensure the need to travel is reduced and that essential travel needs can be met by forms of sustainable transport other than the private car. The council will support development proposals that can be served by alternative modes of transport such as public transport, cycling and walking and in the case of new residential development is located close to local facilities or incorporates opportunities for day to day activities on site and will accept that variations in opportunity for this will vary between larger and smaller settlements in the area.

The council will support demand management measures which discourage single occupancy car travel within new development and encourage the use of low emission vehicles to improve areas with low levels of air quality. Proposals should include measures to encourage the use of sustainable travel options, including public transport, the promotion of personal journey planning, walking, cycling, car sharing, electronic communication and home working.

Travel plans will normally be required for all major planning applications in accordance with current guidance and should set targets and monitoring arrangements to ensure sustainable travel patterns are maintained. Travel plans should include agreed and defined outcomes related to a package of specified measures to be implemented including an approach to lower carbon emissions where applicable.

The requirement of a travel plan will also be considered on case by case basis where the Proposed Development falls below the major application category where it has the potential to generate significant transport movements and/or has insufficient off-street parking within the vicinity of a stressed part of the highway network

Proposals for new development shall be designed to encourage sustainable modes of travel and demonstrate how links have been utilised to encourage connectivity. Proposals will be required to facilitate the needs of the following user hierarchy:

- ▲ Pedestrians;
- ▲ Cyclists;
- ▲ Public transport; and
- ▲ Private vehicles.

3.1.6 Policy LP21 – Highways and Access

Proposals shall demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users.

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 development are not severe.

Proposals shall demonstrate adequate information and mitigation measures to avoid a detrimental impact on highway safety and the local highway network. Proposals shall also consider any impacts on the Strategic Road Network.

All proposals shall:

- ▲ Ensure the safe and efficient flow of traffic within the development and on the surrounding highway network;
- ▲ Where needed, provide new infrastructure or improvements on or off site to ensure safe access from the highway network for pedestrians, cyclists, public transport users and private vehicles;
- ▲ Be accompanied by a supporting Transport Assessment or Transport Statement where the development would generate significant trip generation, providing detail as to the impact on highway safety, air quality, noise and light restrictions;
- ▲ Take into account changes in site levels and topography to ensure the development can be accessed easily and safely by all sections of the community and by different modes of transport;
- ▲ Take into account the features of surrounding roads and footpaths and provide adequate layout and visibility to allow the development to be accessed safely;
- ▲ Take into account access for emergency, service and refuse collection vehicles; and
- ▲ Provide on-site safe, secure and convenient cycle parking/storage facilities to encourage sustainable travel modes.

3.1.7 Policy LP26 – Renewables and Low Carbon Energy

Renewable and low carbon energy proposals (excluding wind) will be supported and planning permission granted where the following criteria are met:

- ▲ The proposal would not have an unacceptable impact on landscape character and visual appearance of the local area, including the urban environment;
- ▲ The proposal would not have either individually or cumulatively an unacceptable impact on protected species, designated sites of importance for biodiversity or heritage assets;
- ▲ The statutory protection of any area would not be compromised by the development;
- ▲ Any noise, odour, traffic or other impact of development is mitigated so as not to cause unacceptable detriment to local amenity; and
- ▲ Any significant adverse effects of the proposal are mitigated by wider environmental, social and economic benefits.

Where the above criteria are met, the council encourages dialogue with local community groups promoting community renewable and low carbon energy schemes.

The creation of district heat networks is encouraged across Kirklees. Heat networks can be developed at different scales and all new developments should consider their potential. Proposals requiring a master plan should explore the potential of developing a heat network or connecting to an existing network.

3.1.8 Policy LP27 – Flood Risk

Proposals for development which require a Sequential Test in accordance with national planning guidance will need to demonstrate that development has been directed to areas at the lowest probability of flooding, following a sequential risk-based approach. The whole Kirklees district should be the starting point for the sequential test with applicants required to provide justification where a smaller area of search is proposed.

If following application of the sequential test, there are no reasonably available sites which could accommodate the development in zones with a lower probability of flooding, it should also be demonstrated that a sequential approach has been applied within sites. This is to ensure that highly vulnerable and more vulnerable uses are directed towards the areas of lowest flood risk within the site.

Proposals will also need to demonstrate that the exception test is passed, where applicable, as set out in national planning policy.

Proposals within flood zone 3a will be assessed in accordance with national policies relating to flood zone 3a but with all of the following additional restrictions:

- ▲ No new highly vulnerable or more vulnerable uses will be permitted;
- ▲ Less vulnerable uses may only be permitted provided that the sequential test has been passed and;
 - ▲ Where extensions are linked operationally to an existing business or;
 - ▲ Where redevelopment of a site provides buildings with the same or a smaller footprint;
- ▲ All proposals will be expected to include flood mitigation measures such as compensatory storage which should be identified and considered through a site-specific Flood Risk Assessment; and
- ▲ Development will not be permitted on any part of the site identified through a site-specific Flood Risk Assessment as performing a functional floodplain role.

Proposals must be supported by an appropriate site-specific Flood Risk Assessment in line with national planning policy. This must take account of all sources of flooding set out in the Strategic Flood Risk Assessment and demonstrate that the proposal will be safe throughout the lifetime of the development (taking account of climate change). The proposal must also not increase flood risk elsewhere and where possible should reduce flood risk. Mitigation measures, where necessary, should be proposed.

Proposals involving building over existing culverts or the culverting or canalisation of water courses will not be permitted unless it can be demonstrated to be in the interests of public safety or to provide essential infrastructure and that there will be no detrimental effect on flood risk and biodiversity. Where feasible, development proposals should incorporate re-opening of culverts, modification of canalised water courses and consideration of mitigation measures to achieve a more natural and maintainable state.

Proposals for natural management such as targeted vegetation planting in upper catchments and along riverbanks will be supported in appropriate locations where consistent with national and local plan policies and relevant water catchment management plans to reduce flood risk and improve water quality.

3.1.9 Policy LP35 – Historic Environment

Development proposals affecting a designated heritage asset (or an archaeological site of national importance) should preserve or enhance the significance of the asset. In cases likely to result in substantial harm or loss, development will only be permitted where it can be demonstrated that the proposals would bring substantial public benefits that clearly outweigh the harm, or all of the following are met:

- ▲ The nature of the heritage asset prevents all reasonable uses of the site;
- ▲ No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- ▲ Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- ▲ The harm or loss is outweighed by the benefit of bringing the site back into use.

Proposals which would remove, harm or undermine the significance of a non-designated heritage asset, or its contribution to the character of a place will be permitted only where benefits of the development outweigh the harm having regard to the scale of the harm and the significance of the heritage asset. In the case of developments affecting archaeological sites of less than national importance where development affecting such sites is acceptable in principle, mitigation of damage will be ensured through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development.

Proposals should retain those elements of the historic environment which contribute to the distinct identity of the Kirklees area and ensure they are appropriately conserved, to the extent warranted by their significance, also having regard to the wider benefits of development. Consideration should be given to the need to:

- ▲ Ensure that proposals maintain and reinforce local distinctiveness and conserve the significance of designated and non-designated heritage assets;

- ▲ Ensure that proposals within Conservation Areas conserve those elements which contribute to their significance;
- ▲ Secure a sustainable future for heritage assets at risk and those associated with the local textile industry, historic farm buildings, places of worship and civic and institutional buildings constructed on the back of the wealth created by the textile industry as expressions of local civic pride and identity;
- ▲ Identify opportunities, including use of new technologies, to mitigate, and adapt to, the effects of climate change in ways that do not harm the significance of heritage assets and, where conflict is unavoidable, to balance the public benefit of climate change mitigation measures with the harm caused to the heritage assets' significance;
- ▲ Accommodate innovative design where this does not prejudice the significance of heritage assets; and
- ▲ Preserve the setting of Castle Hill where appropriate and proposals which detrimentally impact on the setting of Castle Hill will not be permitted.

3.1.10 Policy LP43 – Waste Management Hierarchy

The council will encourage and support the minimisation of waste production and support the re-use and recovery of waste materials including, for example, recycling, composting and Energy from Waste recovery.

Proposals for facilities to manage waste within the district will be considered based upon the following principles:

- ▲ Seeking to move the management of all waste streams up the waste hierarchy of prevention, re-use, recycling, recovery, disposal;
- ▲ Promoting the opportunities for on-site management of waste where it arises;
- ▲ Promoting the use of waste as a resource, particularly encouraging co-location of developments that can use each other's waste materials;
- ▲ Working towards achieving the objectives and targets for recycling/recovery for waste as set out in the Waste Framework Directive; and
- ▲ Supporting opportunities to locate complementary facilities, such as waste disposal points and treatment facilities, in close proximity to each other.

3.1.11 Policy LP51 – Protection and Improvement of Local Air Quality

Development will be expected to demonstrate that it is not likely to result, directly or indirectly, in an increase in air pollution which would have an unacceptable impact on the natural and built environment or to people.

Proposals that have the potential to increase local air pollution either individually or cumulatively must be accompanied by evidence to show that the impact of the development has been assessed in accordance with the relevant guidance. Development which has the potential to cause levels of local air pollution to increase must incorporate sustainable mitigation measures that reduce the level of this impact. If sustainable measures cannot be introduced the development will not be permitted.

Where the development introduces new receptors into Air Quality Management Areas or Areas of Concern or near other areas of relatively poor air quality, for example near roads or junctions, the development must incorporate sustainable mitigation measures that protect the new receptors from unacceptable levels of air pollution. Where sustainable mitigation measures cannot be introduced which prevent receptors from being exposed to unsafe levels of air pollution, development will not be permitted.

3.1.12 Policy LP52 – Protection and Improvement of Environmental Quality

Proposals which have the potential to increase pollution from noise, vibration, light, dust, odour, shadow flicker, chemicals and other forms of pollution or to increase pollution to soil or where environmentally sensitive development would be subject to significant levels of pollution, must be accompanied by evidence to show that the impacts have been evaluated and measures have been incorporated to prevent or reduce the pollution, so as to ensure it does not reduce the quality of life and well-being of people to an unacceptable level or have unacceptable impacts on the environment.

Such developments which cannot incorporate suitable and sustainable mitigation measures which reduce pollution levels to an acceptable level to protect the quality of life and well-being of people or protect the environment will not be permitted.

Where possible, all new development should improve the existing environment.

4.0 Sustainability Statement

4.1 General

The Proposed Development is in accordance with Policy LP3 – Location of New Development – demonstrating an appropriately sized development which offers opportunity for economic growth and new good-quality homes.

By providing employment land which will be released in a phased approach to meet market requirements, the Proposed Development will contribute the job requirements set out in the Local Plan.

The potential for flexibility of businesses to expand within the site shall be considered in the design development.

The mix of housing, employment and local amenities will support the sustainable growth of smaller settlements such as Chidswell, as well as larger towns and cities such as Leeds, Dewsbury and Wakefield. The Site is to form a key element of the North Kirklees Growth Zone, promoting economic and social prosperity in the area.

4.2 Efficient and Effective Use of Land and Buildings

The proposals align with Policy LP7 – Efficient and Effective Use of Land and Buildings.

The Site is allocated as a mixed-use Site (Site MXS7) in the Kirklees Local Plan – adopted February 2019. It is allocated to provide 1,535 dwellings and 122,500m² of employment. MXS7 includes the Heybeck Lane Site, which is covered under a separate planning application. Heybeck Lane includes plans for 181 dwellings. The Proposed Development to the East of Leeds Road, Chidswell covered by this Sustainability Statement, is to provide 1,354 dwellings. The illustrative masterplan shows how the development could incorporate a variety of styles and sizes of dwellings. Therefore, this is in keeping with the allocated dwellings as stated in the Local Plan.

Policy LP7 sets a housing density requirement of 35 dwellings per hectare to achieve efficient use of land.

The Design and Access Statements provided for the Proposed Development states: “The illustrative density plan is provided in relation to the residential land parcels and sets out a ‘design intent’ for the delivery of the scheme. This includes illustrative housing plots and estate roads along with areas of potential tree planting”.

The document goes on to state: “The Lowlands are cited at the eastern tip of the Site and are flanked with existing green infrastructure to three boundaries including the ancient Dogloitch Wood to the north. The parameter plans allow for a lesser density in this area with the potential for larger plots”.

The illustrative masterplan provides an illustrative solution of how the required housing density requirements can be met.

4.3 Energy Efficiency

The development aims to help contribute towards Kirklees Council and the United Kingdom’s aims to reduce emissions associated with dwellings, buildings and transport usage in line with 80% by 2050.

The Proposed Development is to provide high quality energy-efficiency homes and non-dwellings which contribute towards the UK Government’s strategy to reduce greenhouse gas emissions, whilst including provisions to support sustainable transport choices.

Residential dwellings and non-residential buildings shall be designed to meet energy efficiency standards required by all appropriate Building Regulations at the time.

The design shall seek to incorporate energy efficiency measures through a ‘fabric first’ approach to design, in order to reduce energy demand. This approach shall include improvements to building insulation levels beyond minimum U-values, enhanced air tightness and accredited construction details to reduce heat loss through junctions.

Where this approach is not sufficient to meet requirements, inclusion of suitable renewable energy solutions shall be considered, most likely the incorporation of solar photovoltaic (PV) panels.

Kirklees District Council Local Plan policy PLP26 encourages the creation of district heat networks across Kirklees. Heat networks can be developed at different scales and all new developments should consider their potential.

The potential for the effective incorporation of a district heat network within the Site will be explored at the detailed design stage, once the layout of the development has been established and the range of commercial property types and potential occupants are defined.

While detailed floor plans are not available, and only an illustrative masterplan is provided at this outline stage, we have estimated the likely levels of energy consumption and associated CO₂ emissions from the proposed 1,354 dwellings on the site.

The English Housing Survey¹ report published by the Ministry of Housing, Communities & Local Government in July 2018 states that the average floor area of a new dwelling since 2002 is 96m².

A factsheet produced by NHBC² in March 2014, following the introduction of Approved Document ADL1A 2013, states the Target Emission Rate (TER) and Target Fabric Energy Efficiency level (TFEE) to for a typical dwelling is calculated to be 18.72 kgCO₂/m².yr and 54.26 kWh/m².yr, respectively.

The TER sets a limit for the allowable CO₂ emissions from a new build dwelling, while the TFEE sets a limit for the allowable heating energy demand for a new build dwelling.

Assuming a typical floor area of 96m² per dwelling throughout the development, against these typical target levels for carbon emissions and heating demand, the 1,354 dwellings on the Proposed Development would result in total CO₂ emissions of 2,433 tCO₂/yr, and heat demand of 7,053 MWh/yr.

It is anticipated that a detailed Energy Statement shall be produced at the Reserved Matters stage, which shall incorporate the calculation of energy consumption and associated CO₂ emissions for the Proposed Development for a representative sample of dwellings and proposed commercial properties, allowing for detailed consideration of a district heating network.

4.4 Sustainable Transport

The Proposed Development aligns with Local Policy to help towards reducing pollution and congestion levels, and to encourage walking, cycling and the use of public transport. By encouraging these alternative modes of transportation, it is anticipated that the Proposed Development will have a positive impact on the environment both through a reduced reliance on fossil fuel resources and a reduction in harmful emissions which contribute to low air quality and climate change.

As around 30% of UK energy use is associated with transport, developments of this nature and scale have the potential to increase the number of vehicles on the local road network. However, developments of this scale also have huge potential to create a step-change shift towards local sustainable transport and travel.

The Site is located to the east of the A653 Leeds Road dual carriageway, which is a strategic corridor between Dewsbury and Leeds. In the immediate vicinity of the Site, Leeds Road runs in a north-south direction, adjoining the A638 Wakefield Road and Junction 28 (the Tingley Interchange) of the M62 Motorway to the north. The A638 Wakefield Road links with the M1 Motorway Junction 40 to the east of the Site.

The Site is located within reach of many local train stations including Batley (2miles) and Dewsbury (2.5miles).

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/725085/Floor_Space_in_English_Homes_main_report.pdf

² http://www.nhbc.co.uk/NHBCPublications/LiteratureLibrary/Technical/TechnicalExtra/filedownload_55428.en.pdf

Leeds Road, Chidswell is also a well-served bus route – with routes connecting Dewsbury, Leeds, Wakefield and Huddersfield. The internal ‘spine’ road which serves the entire development has been designed to accommodate buses, with the view to establish commercial bus services, either as a new route or a diversion/extension to an existing service.

Figure 3 – Site Location Map



Heavy goods vehicles (HGV) traffic to and from the employment land will be limited to the Leeds Road (North) (1062 Leeds Road) access. Techniques such as road width reductions will be employed to prevent HGVs from accessing residential areas of the Site, whilst allowing smaller vehicles such as personal cars to travel between residential and employment.

It is anticipated that the development will provide at least one cycle parking space per dwelling in order to encourage sustainable local transport, reducing the reliance on cars for short journeys and helping to limit local air pollution.

The provision of dwellings, employment land, local leisure facilities and schools allow for walkable local community which reduce the reliance on single-occupancy car travel.

A Framework Travel Plan is submitted with the planning application and sets out measures to achieve more sustainable multimodal travel.

Measure include: Marketing and Promotion; Measures to Promote Public Transport Use; Measures to Promote Walking and Cycling; Measures to promote Efficient Car Use; Measures to Promote Electric Vehicles; and General Measures to Reduce Unnecessary Travel.

The Framework Travel Plan includes for a Monitoring Plan, including Travel Plan Targets, Action Targets and Aim Targets.

4.5 Waste Management

The sustainability objective is to reduce waste going to landfill through material efficiency, recycling and sustainable construction methods.

The waste hierarchy will be employed throughout the design and construction process. Waste is to be designed out of the Proposed Development to limit unnecessary waste, where possible. It is anticipated that Site Waste Management Plans will be utilised during construction to ensure that waste is collected, treated and processed in the most environmentally beneficial way as possible.

4.6 Materials Sourcing and Recycling

It is anticipated that consideration of suitable approaches to materials sourcing, including the re-use and recycling of materials at end-of-life, will be taken during the design process.

Lifecycle GHG emissions resulting from materials selection and sourcing can be reviewed as part of detailed design at the Reserved Matter Stage.

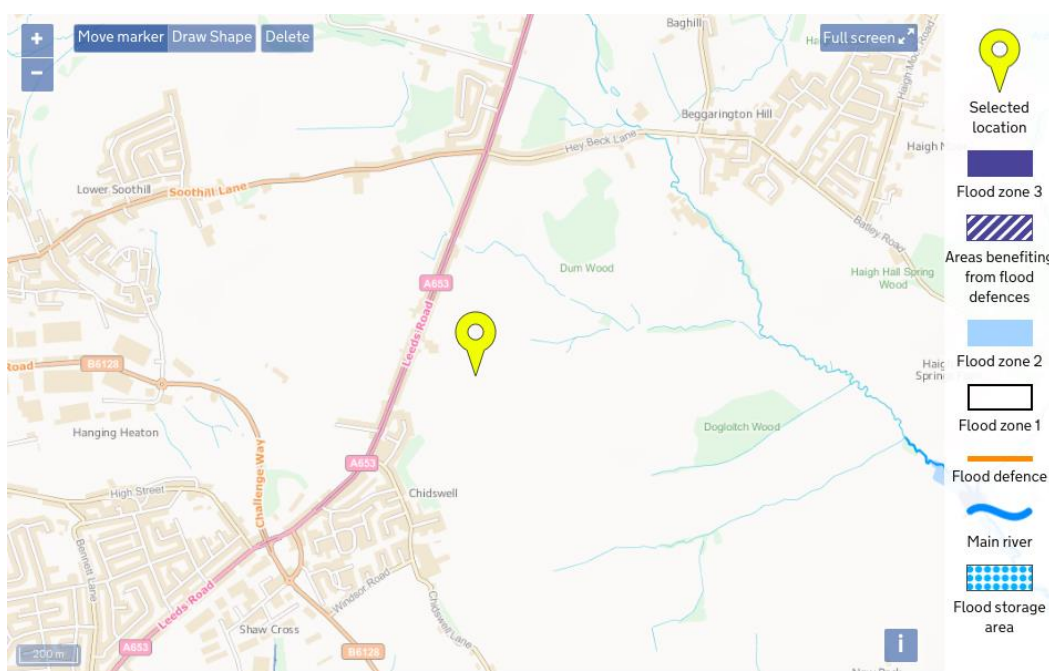
4.7 Built Heritage and Archaeology

The Site does not contain any listed buildings, nor is it located within a Conservation Area. The nearest listed building is Haigh Hall (Grade II), located approximately 735 m to the east of the Site.

4.8 Flood Risk

The Site is primarily within Flood Zone 1 as defined by the Environment Agency Flood Maps, demonstrating a low risk to flooding. This is in the line with Policy LP27 – Flood Risk for prioritising development in areas of the lowest probability of flooding.

Figure 4 – Environment Agency Flood Map for Leeds Road, Chidswell



The retention of existing streams, where possible, and the introduction of new blue infrastructure such as ditches and permeable surfaces will allow for sustainable drainage. This is to reduce the potential for surface water flooding on the Site and reduce negative impacts on neighbouring sites by attenuating water on the Site itself.

4.9 Land Use and Ecology

The sustainability objective is to protect, maintain and enhance existing biodiversity and habitats, and to create new habitats to add value to the landscape in order to improve the urban environment.

The surrounding area is characterised predominantly by agricultural land, with a mix of early and late 20th century bungalows and semi-detached properties fronting the main arterial routes.

The Site is gently undulating, with two notable landscape features: a higher 'ridge' to the west of the centre, and a 'bowl-like' valley to the north, drained by the streams and ditches.

There are no statutory environmental designations on the Site, however the Site is adjacent to an area identified as a Local Wildlife Site which is part of the Wildlife Habitat Network and is designated as Ancient Woodland (Dogloitch Wood and Dum Wood to the east).

The Proposed Development is to comply with all regulations to protect ecology during construction works. Extensive green and blue infrastructure (as shown on the submitted parameter plans which accompany the planning application) is incorporated to underpin possible measures to enhance the ecological value and biodiversity at the Site, by creating new habitats and connecting existing habitats. Whilst trees may have to be removed to allow for the development, it is anticipated that they will be replanted to ensure no net loss of trees on Site.

The Proposed Development site is an allocated site, and as such any potential loss of agricultural land has been assessed by Kirklees District Council and on balance deemed acceptable.

4.10 Pollution

4.10.1 Air Quality

Through the development of high-quality energy efficient homes and the promotion of sustainable transport methods, the Proposed Development aims to prevent any adverse impacts on air pollution in the local area.

An Air Quality Assessment has been prepared by Delta-Simons. This identifies the impact of the Proposed Development on local Air Quality, as well as suitable mitigation measures.

HGV routing on site (as set out in Section 4.4, above) is intended to limit access of HGVs to employment areas, and reduce the impact of GHV emissions in residential areas.

4.10.2 Odour

Delta-Simons completed an Odour Risk Assessment for the Proposed Development (19-0865.07, dated November 2019). The risk assessment was carried out as the Site is located in an area where nearby agricultural activities including livestock rearing may influence odours. The first phases of development may be completed before the agricultural activities cease. However, activities are due to cease at the site before the whole development is completed.

The report concluded that whilst there were potential odour sources at Chidswell Farm with the potential to affect sensitive locations, due to the prevailing wind direction away from the Site, it is unlikely that this will result in any significant impact to the residential amenity.

The risk assessment concluded that there is a low risk of adverse odour impacts.

5.0 Conclusions

In conclusion, the Proposed Development has been considered in accordance with the needs of the NPPF and Kirklees Local Plan Strategy and Policies (2019) LP1, LP3, LP7, LP19, LP20, LP21, LP26, LP27, LP35, LP43, LP51 and LP52.

This outline stage submission incorporates an illustrative masterplan in accordance with the needs of Efficient and Effective Use of Land and Buildings.

The specific approach to energy efficiency of dwellings and commercial buildings will be set out in greater detail within an Energy Statement at the Reserved Matters Stage, however the intended approach to achieve energy efficiency standards via a fabric first approach to design, with consideration of a district heat network for the site, and local renewable energy generation where necessary is in keeping with the local planning requirements and the NPPF.

The consideration of travel and transport measures within the Framework Travel Plan addresses the needs of Strategic Transport Infrastructure, Sustainable Travel and Highways and Access.

The Proposed Development is located in an area Flood Zone 1 in keeping with the local requirements for prioritising development in areas of the lowest probability of flooding.

At this Outline application stage, it is challenging to set out categorical measures which will be incorporated into the final scheme however this will be explored in detail within the subsequent submissions should planning permission be granted.

Subject to provision of detailed design at Reserved Matters stage in accordance with the outline approach set out at this stage, it is considered that the Proposed Development shall meet the sustainability requirements of local and national planning policy.

Appendix A - Data Sources

- ▲ National Planning Policy Framework, February 2019;
- ▲ Kirklees Local Plan Strategy and Policies, February 2019; and
- ▲ Site Location Plan (Ref: 00-500), August 2019.

Appendix B - Limitations

The recommendations contained in this Report represent Delta-Simons professional opinions, based upon the information listed in the Report, exercising the duty of care required of an experienced Sustainability Consultant.

Delta-Simons obtained, reviewed and evaluated information in preparing this Report from the Client and others. Delta-Simons conclusions, opinions and recommendations has been determined using this information. Delta-Simons does not warrant the accuracy of the information provided to it and will not be responsible for any opinions which Delta-Simons has expressed, or conclusions which it has reached in reliance upon information which is subsequently proven to be inaccurate.

This Report was prepared by Delta-Simons for the sole and exclusive use of the Client and for the specific purpose for which Delta-Simons was instructed. Nothing contained in this Report shall be construed to give any rights or benefits to anyone other than the Client and Delta-Simons, and all duties and responsibilities undertaken are for the sole and exclusive benefit of the Client and not for the benefit of any other party. In particular, Delta-Simons does not intend, without its written consent, for this Report to be disseminated to anyone other than the Client or to be used or relied upon by anyone other than the Client. Use of the Report by any other person is unauthorised and such use is at the sole risk of the user. Anyone using or relying upon this Report, other than the Client, agrees by virtue of its use to indemnify and hold harmless Delta-Simons from and against all claims, losses and damages (of whatsoever nature and howsoever or whensoever arising), arising out of or resulting from the performance of the work by the Consultant.