

Kirklees Planning Application 2022/48/93248/W

Application for Full Planning Permission – Kirklees Cultural Heart Land and Buildings at Queensgate Market, Huddersfield Library and Art Gallery and Piazza (and The Shambles) Shopping Centre, Huddersfield.

1. Objection to felling trees. Kirklees Council has declared a Climate Emergency and a commitment to Net Zero, while the Climate Change Act 2008 (as amended) targets 100% reduction in Green House Gas by 2050. Kirklees Council Local Plan Strategic Objective 7 states that proposals in the Local Plan should be consistent with promoting development that helps to reduce and mitigate climate change, and development which is adapted so that the potential impact from climate change is reduced and to help the transition towards a low carbon economy.

Replacement Trees. The 26 mature trees proposed to be felled for this development, as mature trees, would each be nominally equivalent to the carbon sequestration of about 500 10 year old trees, making a total of 13,000 10 year old trees (1), or each 4000 saplings, total 100,000 saplings. Furthermore emphasising the climate benefits of old trees versus new trees, e.g (4)

Conservation Area TPO and Amenity. The trees proposed to be felled, are all or partly in a Conservation Area and thus are subject to protections of Tree Preservation Orders. The grounds for the proposed felling are wholly invalid, that the trees obscure the building. Furthermore, permitted grounds for granting or upholding TPO, include mitigation of Climate Change, biodiversity and air quality. There is no good reason that the trees should not be conserved within the scheme, thus upholding TPO, Environment Act, WYCA and Kirklees Climate Emergency declarations and Carbon Emissions Reduction Programme (CERP). There is no valid case for felling the trees in order to develop the site. The trees can be accommodated and enhance the development, adding very significant sustainability, visual, heritage, amenity, health, climate and policy integrity advantage.

Air quality implications. WYCA's Climate Emergency declaration and Carbon Emissions Reduction Programme (CERP), identifies the vital role of Trees and Air Quality (2), noting the position adjacent to the Ring Road and by the development, the exposure of large crowds. Even with electric vehicle, brake dust, noise and other.

Biodiversity Net Gain in Kirklees Kirklees Council Technical advice note (7), Biodiversity Net Gain in Kirklees, on Biodiversity Net Gain requirements for developments within Kirklees, states that Biodiversity Net Gain should be achieved by development within Kirklees being in accordance with Local Plan policy LP30 (Biodiversity and Geodiversity) Environment Act 2021. Policy LP30 of the Kirklees Local Plan requires development proposals to “provide (10%) net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation”. The proposed tree felling negates the Council's own Technical Advice Note.

Social Benefits Cost benefit analysis shows that mature trees have much higher social benefits than newly planted trees: "Retaining an existing tree (provided it has adequate space for root and crown development) is five times more cost effective than periodic removal and replacement." (3)

2. Development Carbon Assessment. The Application shows little ambition, serious commitment or innovation to absolutely minimise/zero carbon footprint of the development in all respects, e.g.:

- * Minimise the loss of embedded carbon from demolition of existing structures
- * Absolutely minimising material carbon footprint of new development in every detail.
- * Implications of development for transport carbon footprint. Innovative practical incentives for access by public transport and discouragement for car use.
- * Offset unavoidable carbon footprint, remotely by dedicated tree planting scheme if space constrained.

Renewable Energy. There is missed opportunity to maximise the renewable energy generation capacity of the development, most likely Solar PV on the very significant whole roof structure, noting particular opportunity to specify used commercial PV panels, for which there is good supply, with the major advantage of "used" having already offset the significant PV manufacturing carbon (first 6 years generation), and/or upcycled new PV salvaged from EU PV manufacturing, noting the Audi HQ as a high profile exemplar of upcycled PV.

Optimise Passive Solar. Off peak low carbon heat pump space heating.

(1) Understanding the Carbon and Greenhouse Gas Balance of Forests in Britain. Forestry Commission - Forest Research FCRP018. 2012. pp3,11,21,24

(2) WYCA Carbon Emissions Reduction Programme (CERP) Tackling the Climate Emergency and Improving Air Quality para 2.29

(3) https://www.treeeconomics.co.uk/wp-content/uploads/2018/08/GBU_Street-Tree-Cost-Benefit-Analysis-2018.pdf

(4) <https://theconversation.com/big-old-trees-grow-faster-making-them-vital-carbon-absorbers-22104>

(6) Branching Out: Modeling Leaf Weight by Tree Growth Simulation Control # 16647 February 14, 2012

<https://sites.math.washington.edu/~morrow/mcm/16647.pdf>

(7) Kirklees Council Biodiversity Net Gain in Kirklees Technical advice note on Biodiversity Net Gain requirements for developments within Kirklees

8 November 2021