



Industrial Units,
Blackmoorfoot Road,
Crossland Hill, Huddersfield
Climate Change Statement

On Behalf of
Park Valley Huddersfield

Revision No: 02

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1. Executive Summary

1.1 General

The sustainability statement has been prepared on behalf of Park Valley Huddersfield and is in support of the proposed industrial units at Blackmoorfoot Road, Crossland Hill, Huddersfield.

The Statement the sustainability and energy requirements as set out within the Kirklees council 'Local Plan – Strategy and Policies' adopted February 2019, and the Kirklees Council issued 'Climate Change Guidance for Planning Applications' guidance note issued June 2021.

The proposed development shall incorporate the essential consideration and desirable measures where practical and feasible as detailed within the guidance in the Kirklees Council issued 'Climate Change Guidance for Planning Applications' guidance note.

2. Introduction

2.1 General

The sustainability statement has been prepared on behalf of Park Valley Huddersfield and is in support of the proposed industrial units at Blackmoorfoot Road, Crossland Hill, Huddersfield.

The Statement the sustainability and energy requirements as set out within the Kirklees council 'Local Plan – Strategy and Policies' adopted February 2019, and the Kirklees Council issued 'Climate Change Guidance for Planning Applications' guidance note issued June 2021.

3. Policy Review

3.1 General

This section summarises the policy context for the sustainability statement, with a focus upon energy and carbon reduction and the various policies from international to local level.

3.2 National Planning Policy Framework

The National Planning Policy Framework (NPPF or the Framework) was introduced in March 2012 to set out government planning policy for England, removing all regional level planning policy in favour of ‘a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.’

A number of iterations have since been published. The Framework was revised on the 20 July 2021, replacing the previous update in February 2019. All new Local and Neighbourhood Plans and reviews must align with the policies of the Framework 2021.

The Framework states clearly that the purpose of planning is to help deliver sustainable development and defines three mutually dependent pillars that must be equally considered in order to achieve this:

- Economic;
- Social; and
- Environmental.

There is a clear focus upon:

- Promoting high-quality design for new homes and places;
- Offering stronger protection for the environment;
- Constructing the right number of homes in the right places; and
- Focusing on greater responsibility and accountability of councils and developers for housing delivery.

3.3 Local Policy

3.3.1 Kirklees Local Plan

The Kirklees Local Plan Strategy and Policies was adopted by Kirklees Council in February 2019 and contains the following policies relating to Sustainability:

Policy LP24 Design

Good design should be at the core of all proposals in the district and should be considered at the outset of the development process, ensuring that design forms part of pre-application consultation of a proposal. Development briefs, design codes and masterplans should be used to secure high quality, green, accessible, inclusive and safe design, where applicable. Where appropriate and in agreement with the developer schemes will be submitted for design review.

Proposals should promote good design by ensuring:

- d. high levels of sustainability, to a degree proportionate to the proposal, through:
 - i. The re-use and adaptation of existing buildings, where practicable;
 - ii. design that promotes behavioural change, promoting walkable neighbourhoods and making walking and cycling more attractive;
 - iii. considering the use of innovative construction materials and techniques, including reclaimed and recycled materials;
 - iv. where practicable, minimising resource use in the building by orientating buildings to utilise passive solar design. This includes encouraging the incorporation of vegetation and tree planting to assist heating and cooling and considering the use of renewable energy;
 - v. providing charging points to encourage the use of electric and low emission vehicles;
 - vi. incorporating adequate facilities to allow occupiers to separate and store waste for recycling and recovery that are well designed and visually unobtrusive and allows for the convenient collection of waste;
 - vii. designing buildings that are resilient and resistant to flood risk, where such buildings are acceptable in accordance with flood risk policies and through incorporation of multi-functional green infrastructure where appropriate;
 - viii. designing places that are adaptable and able to respond to change, with consideration given to accommodating services and infrastructure, access to high quality public transport facilities and offer flexibility to meet changing requirements of the resident / user.

Policy LP26 Renewable 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:

- a. the proposal would not have an unacceptable impact on landscape character and visual appearance of the local area, including the urban environment;
- b. the proposal would not have either individually or cumulatively an unacceptable impact on protected species, designated sites of importance for biodiversity or heritage assets;
- c. the statutory protection of any area would not be compromised by the development;
- d. any noise, odour, traffic or other impact of development is mitigated so as not to cause unacceptable detriment to local amenity;
- e. 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.

3.3.2 Kirklees Climate Emergency

The declaration of a climate emergency by Kirklees Council in January 2019 means that a greater focus on climate change is required in emerging and future planning policy documents. It also places a greater focus on the Planning and Development Service to ensure developments, applicants and developers are focussed on the council's priorities for a greener and more sustainable environment.

In November 2019, Kirklees council adopted a target to achieve 'net zero' in carbon emissions by 2038. This provides Kirklees with focus on both mitigation and adaptation to climate change. For mitigation, carbon emissions from human activities within Kirklees will need to be dramatically reduced to zero, with any remaining emissions safely removed from the atmosphere.

To achieve the 'net zero' by 2038 target, a stepping-stone of emission reduction targets have been identified as follows:

- 63% reduction by 2025
- 78% reduction by 2030
- 87% reduction by 2035
- 92% reduction by 2040
- 95% reduction by 2045
- 100% reduction by 2050

The emission reductions will be monitored and evaluated against these target dates.

3.3.3 Climate Change Guidance

Kirklees Council issued 'Climate Change Guidance for Planning Applications' guidance note in June 2021 to take effect from 23rd June 2021. The guidance note clarifies the expected content within the Climate Change Statement to ensure developments, applicants and developers are focussed on the council's priorities for a greener and more sustainable environment.

The guidance is divided into short sections to provide advice on completing each section of the Climate Change Statement. The guidance highlights which measures are:

- Essential considerations (where these are stated within a local plan policy); or
- Desirable (where further actions are encouraged).

Proposals should consider all measures outlined in this guidance (proportionate to the scale of development proposed) to ensure options to mitigate climate change have been fully explored.

4. Climate Change Checklist

4.1 General

The following sections provide a summary of the proposed measures at the development to address the requirements of the Kirklees Council 'Climate Change Guidance for Planning Applications' guidance note.

4.2 Reducing Energy Demand

4.2.1 Measures

It is noted the use of Combined Heat and Power (CHP) for developments is an essential consideration within the Kirklees Council 'Climate Change Guidance for Planning Applications' guidance note. The industrial units will be registered under the new approved Document L of the Building Regulations 2021, which has been updated following the issue of the Kirklees Council climate change guidance in 2019. The use of all electric solutions is now encouraged to achieve carbon reduction targets for building regulation compliance, and CHP is no longer a beneficial solution for Part L compliance. Therefore to comply with Building Regulations, it is expected the industrial units will provide fully electric for the generation of regulated energy use.

The scheme will aim to include smart energy metering, building services controls and energy efficient white goods where feasible. This will be further explored during detailed design.

4.3 Minimising carbon emissions and waste during construction

4.3.1 Measures

It will be a requirement of the contract for any principal contractor in charge of the construction site will produce a Site Waste Management Plan (SWMP) to incorporate procedures to minimise waste as part of development proposals during demolition, site clearance and construction. They will be required to hit best practice diversion from landfill, and construction resource efficiency targets.

Waste storage areas during operation will be provided which will be labelled, segregated and accessible to provide recyclable and general waste storage areas for the expected waste streams from the development.

It will be an aim of the contract to ensure the principal contractor considers the embodied carbon, environmental management systems of the manufacture and sustainable sourcing when procuring materials for the development.

4.4 Renewable and low carbon energy

4.4.1 Measures

The feasibility of a number of potentially appropriate low carbon and renewable energy technologies have been discussed for the proposed development as follows.

Technology	Suitable?	Observations
Air source heat pumps	√	Feasible technology to provide space heating and cooling.

Ground source heat pumps	X	Not considered feasible due to high capital costs. Air source heat pumps are preferred heat pump solution.
Biomass hot water	X	May affect lettability for potential future occupiers as biomass is not a common heating solution.
Solar water heating	X	Proposed hot water generation is likely to be instant electric which is not easily compatible with solar thermal water heating.
Photovoltaics	√	Roof space available, and feasible to incorporate.
Wind turbines	X	Poor yield within urbanised area and likely planning issues.
CHP (Combined Heat and Power)	X	No constant heating baseline to make CHP viable solution.

The most suitable option renewable energy option for the industrial units would be the incorporation of a solar photovoltaic array to generate zero carbon energy for each individual unit.

An air source heat pump (ASHP) VRF system is proposed to provide heating and cooling to the office and core areas. This technology is considered low carbon when in heating mode, and will provide a highly efficient solution for the conditioning of the office spaces.

Air and ground source heat pumps could be installed, however only the Air Source Heat Pump (ASHP) system is considered feasible due to high capital expenditure requirements of ground source systems

Potential carbon emission savings from biomass are significant, however biomass heating plant and storage area would reduce the lettable space within the building. It is also not considered a common heating solution and may impact the potential lettability of the units.

Potential energy saving from solar thermal water heating could be achieved, however it is likely the proposed domestic hot water generation will be via instant electric hot water units, which are not easily compatible with a solar thermal water heating system. This could be revisited later in the design process if the solution changes.

A Combined Heat and Power (CHP) solution is not deemed feasible for the proposed development as it requires a steady baseload of heat to increase the running hours and justify the economical viability of this solution.

No existing heat networks are in close proximity of the scheme, therefore the connection to district heat networks are not to be explored further.

4.5 Building design and layout for carbon reduction

4.5.1 Measures

A 'fabric first' approach shall be adopted for the new development, and the design team shall include a range of energy efficiency measures including:

- Enhanced U-values to reduce energy demand associated with space heating.
- Maximise the use of natural daylight both within the occupied areas to reduce energy use associated with artificial lighting.
- Reduced air permeability to reduce energy demand.

The proposed building services efficiencies shall exceed the Part L minimum values with high efficiencies throughout, and a lighting design incorporating high luminaire efficacies.

It is proposed for the scheme to undergo a formal BREEAM assessment to target a Very Good rating, which will incorporate holistic sustainability principles in the scheme as follows:

- Electric vehicle charging points.
- Main contractor operates a considerate constructors site.
- Low-flow sanitaryware fittings.
- Health and wellbeing promoted to occupied areas via best practice lighting levels, ventilation and acoustics.
- Sustainable and responsible sourcing of materials.
- Cycle spaces

4.6 Considering flooding and minimising its impacts

4.6.1 Measures

A Flood Risk and Drainage Assessment has been undertaken as part of the planning application. This confirms the site is located within Flood Zone 1 as indicated on the Environment Agency Flood Zone map, and the development is considered at low risk of flooding from all other sources.

The surface water drainage system has been designed in accordance with the SuDS Manual and national and local policies to manage 1:100 + 45% climate change flows within the site.

4.7 Minimising water usage

4.7.1 Measures

The conservation of potable water demand within the development has been considered through water conservation techniques in line with policy LP34. Low-flow sanitaryware fittings will be specified within the proposed development to reduce potable water consumption. This will include:

- Dual flush WCs.
- Spray and low-flow wash hand basin taps.
- Low-flow showers.

There are currently no proposals to incorporate rain or grey-water harvesting within the proposed development due to the feasibility of incorporating a system of this type. This will be re-investigated at detailed design for each unit.

4.8 Landscaping and biodiversity

4.8.1 Measures

A preliminary ecological assessment and biodiversity net gain calculation has been undertaken by Envirotech.

The UK Habs V2 habitat survey has been used to identify relevant habitat areas, linear habitat areas and watercourse units. These habitats have been input into the statutory biodiversity metric calculator R2 and indicate a total of 3.52 biodiversity area units and zero terrestrial linear units and zero watercourse units.

Under the current proposals there will be two retained habitats, two enhanced habitats and six new habitat areas, which would comprise a total of 5.52 biodiversity area units, therefore achieving a 57.12% increase and meeting the essential consideration of providing a net gain in biodiversity.

The use of drought resistant plants, water retaining mulches and ground cover plants to reduce potable water consumption during operation will be investigated during detailed landscaping design to meet the desirable considerations.

4.9 Air pollution

4.9.1 Measures

A site specific transport assessment and travel plan has been produced to identify the existing transport constraints and opportunities at the proposed scheme. This includes details of sustainable transport measures to encourage active travel and reduce the reliance upon private cars. To meet the essential consideration, a draft travel plan will be produced and disseminated to future occupiers to include initiatives to promote walking, cycling, public transport use and reduction of private car use.

All units shall include at least one electric vehicle charging point (EVCP) as a minimum, with 30 EVCP spaces (15% of the total parking) are provided across the site; 12 of these are allocated to Unit 1.

All units will include at least one accessible space as a minimum. 22 accessible spaces (11% of the total parking) are provided across the site; 6 of these are allocated to Unit 1.

10 no. car share parking spaces are provided at Unit 1 (9% of the total parking for the unit) to promote the use of alternative transportation to individual car commuting.

It will be a requirement of the main contractor to aim to procure construction materials locally where possible to reduce carbon emissions and improve air quality associated with transportation of materials.

Any new mechanical ventilation systems will be designed in line with British standards to improve the comfort levels of building occupants during the working day.

5. Summary

The proposed development shall incorporate the essential consideration and desirable measures where practical and feasible as detailed within the guidance in the Kirklees Council issued 'Climate Change Guidance for Planning Applications' guidance note.