



# New Mills, Marsden

Climate Change Statement

On Behalf of  
John Edward Crowther Limited

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## 1. Executive Summary

### 1.1 General

This Climate Change statement has been prepared on behalf of John Edward Crowther Limited and is in support of the proposed planning submission for the proposed development at New Mills, Marsden.

The Statement addresses the guidance in the Kirklees Council published 'Planning Applications Climate Change Guidance' issued June 2021, detailing the mitigation measures presented within the application.

The proposed development shall incorporate the essential consideration and desirable measures where practical and feasible as detailed within the Kirklees Council issued 'Planning Applications Climate Change Guidance' 2021.

## 2. Introduction

### 2.1 General

The Climate Change statement has been prepared on behalf of John Edward Crowther Limited and is in support of the proposed planning submission for the proposed development at New Mills, Marsden.

The Statement addresses the guidance in the Kirklees Council published 'Planning Applications Climate Change Guidance' issued June 2021 detailing the mitigation measures proposed for the development.

## 3. Policy Review

### 3.1 General

This section summarises the policy context for the climate change statement 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 in 2025, replacing the previous update. All new Local and Neighbourhood Plans and reviews must align with the policies of current Framework.

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 key planning policies that guide sustainable development across the district.

##### **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.

#### **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.

Reflecting the three pillars of sustainability (economic, social and environmental), a range of additional Local Plan policies also address sustainability and climate change. These include:

- LP5 Masterplanning Sites
- LP27 Flood Risk
- LP28 Drainage
- LP30 Biodiversity & Geodiversity
- LP31 Strategic Green Infrastructure Network
- LP34 Conserving and enhancing the water environment
- LP43 Waste Management Hierarchy
- LP47 Healthy, active and safe lifestyles
- LP51 Protection and improvement of local air quality

### 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 series of emission reduction targets have been identified within the Kirklees Climate Change Action Plan, 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 'Planning Applications Climate Change Guidance' in June 2021 to take effect from 23<sup>rd</sup> 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 considerations of the proposed development to address the requirements of the Kirklees Council 'Planning Applications Climate Change Guidance' (June 2021).

The proposed development is expected to achieve net gains across all three pillars of sustainable development - economic, social and environmental. Collectively, these measures will contribute the council's ambition to mitigate and adapt to the effects of climate change.

### 4.2 Reducing Energy Demand

#### 4.2.1 Measures

A fabric first approach has been taken to reduce energy demand in the development. This is further discussed in *4.5 Building design and layout for carbon reduction*.

While the Kirklees 'Planning Applications Climate Change Guidance' (June 2021) identifies Combined Heat and Power (CHP) as an essential consideration, the proposed development has a preference to adopt a fully electric strategy for space heating and hot water to futureproof the development to achieve net zero.

Since publication of the updated Approved Document L 2021 (in force from June 2022) and with the forthcoming Future Homes and Buildings Standard, the UK's rapidly decarbonising electricity grid has made all-electric, heat-pump-based systems the preferred route for achieving Building Regulations compliance and long-term carbon reduction. Consequently, the use of fossil-fuelled CHP is no longer considered appropriate or compatible with national and local decarbonisation targets.

The scheme will incorporate smart energy metering, where appropriate, with displays showing the amount and cost of energy consumed to encourage sustainable behaviour. Building services are intended to include intuitive user-friendly controls to support effective energy management. Energy efficient white goods will be specified where feasible. Occupiers will be provided with user guides on the building systems to facilitate their proper and efficient use.

### 4.3 Minimising carbon emissions and waste during construction

#### 4.3.1 Measures

The scheme will, in the majority, retain and sensitively refurbish several of the existing buildings including West Mill and tower, East Mill and tower and Brougham Road Frontage. This will avoid the upfront embodied carbon associated with the construction of new buildings. Refurbished buildings will be upgraded to achieve improved operational energy performance and extend their lifespan.

Remaining structures on site will be demolished to facilitate the de-culverting of the River Colne, the creation of new green spaces, site infrastructure and the provision of a moderately sized, purpose built, industrial unit. This new building will be built to current Building Regulations standards, offsetting the loss of embodied carbon through significantly improved efficiency in operation.

A detailed Site Waste Management Plan (SWMP) has been prepared for the development, setting out measures to minimise waste and reduce construction-related carbon impacts throughout demolition, refurbishment and new-build phases. The SWMP includes details around pre-demolition audit, waste-segregation strategy, salvage and reuse of heritage materials where feasible, onsite crushing of masonry for reuse, and recycling targets exceeding 90% for demolition waste and 80% for construction waste. It establishes procedures for licensed waste handling, monitoring and reporting of waste streams, and identifies measures to reduce transport impacts associated with material delivery and waste removal. All contractors will be required to comply with the SWMP for the duration of the works.

Suitable operational waste storage areas will be included in the architectural design to provide labelled, segregated and accessible recyclable and general waste storage areas for the expected waste streams from the development.

During procurement, the contractor will be required to consider the use of prefabricated elements, locally sourced materials, and products that are durable, responsibly sourced (e.g. FSC, PEFC, BES 6001 certified), and have low life-cycle environmental impact, demonstrated through Environmental Product Declarations where available.

## 4.4 Renewable and low carbon energy

### 4.4.1 Measures

The preferred energy strategy for the development, pending a review of viability, will adopt a fully electric solution to meet all regulated energy demands and to prepare for a net zero future. This aligns with the national transition towards low-carbon building services and grid decarbonisation.

Air Source Heat Pumps (ASHPs) are likely to be the preferred solution to provide space heating and cooling, offering a low-carbon alternative to fossil-fuel combustion systems. Roof-mounted solar photovoltaic (PV) arrays are likely to be integrated across suitable roof areas to generate renewable electricity on site and offset part of the development's electric demand. Together, these systems would significantly reduce operational carbon emissions and will futureproof the development for a net zero transition.

No existing district heat networks are located within feasible proximity of the site; therefore, connection to a local heat network has been discounted as part of the energy strategy.

Given the small-medium scale of the proposed development, and medium-low site density, a centralised energy centre is not considered to offer additional carbon or efficiency benefits and is not considered to be economically viable. Opportunities for future integration of shared low-carbon energy infrastructure will continue to be reviewed as the design develops.

## 4.5 Building design and layout for carbon reduction

### 4.5.1 Measures

The design of the proposed development follows the principles of the energy hierarchy, prioritising energy demand reduction through passive design, followed by efficient building services, and finally the integration of renewable and low-carbon energy generation. This approach will ensure that energy efficiency is maximised before renewable technologies are applied, in line with Policy LP24.

A 'fabric first' approach will be adopted to minimise energy demand by optimising insulation, airtightness, glazing performance, and natural daylighting to meet or exceed the requirements of Part L of the Building Regulations. While constrained by the openings in the existing buildings, glazing across the scheme will, where feasible, maximise solar gain in winter while minimising overheating risk in summer. Thermal mass of the existing buildings will help regulate internal temperatures, reducing the need for active heating or cooling.

Building services, including lighting systems, will be designed to achieve efficiencies that exceed the notional targets set out in Part L of the Building Regulations. Intuitive controls, including automatic operation where appropriate, and effective zoning will be incorporated to optimise performance and minimise energy waste associated with occupant behaviour. The new building has a south facing roof to maximise the efficiency and yield of photovoltaic panels.

The development has been designed to support low-carbon travel by enabling residents, staff and visitors to meet most day-to-day needs locally, reducing the need for longer-distance trips. The site's proximity to Marsden rail station, local bus routes and village amenities naturally promotes walking, cycling and public transport use.

Measures outlined in the Transport Assessment and Framework Travel Plan include improved pedestrian and cycle connections, secure cycle parking, EV charging provision and on-site facilities to support active sustainable travel. A range of behaviour-change initiatives, such as personalised travel plans, car-club promotion and awareness of local services, will further encourage sustainable travel and minimise transport-related emissions, and these will be supported in operation of the development.

## 4.6 Considering flooding and minimising its impacts

### 4.6.1 Measures

A site-specific Flood Risk Assessment (FRA) has been completed for the development. The FRA confirms that an Exception Test is not required as all proposed uses are compatible with the Flood Zones in which they lie. While a Sequential Test is not formally required for the site, an assessment has been carried out and confirms that no alternative sites of similar type and scale exist in Marsden within a lower flood risk area.

The FRA demonstrates that the development will be safe for its lifetime through a combination of measures including setting finished floor levels for new and refurbished buildings above the 1% Annual Exceedance Probability (AEP) plus 30% climate change flood level, incorporating flood resilience measures where levels cannot be raised, and ensuring safe access and egress is maintained via Brougham Road during extreme flood events. Overland exceedance routes have been designed to channel flows away from buildings and through hardstanding and landscaped areas, further safeguarding occupants and property.

The scheme incorporates sustainable drainage principles, new open space and the de-culverting of the River Colne, which will increase flood storage on site and reduce flood risk of the site and surrounding areas. The drainage strategy delivers a 30% reduction in surface-water discharge, restricting flows to the River Colne to 149 l/s using a geo-cellular attenuation tank which is proposed to provide 290.7 m<sup>3</sup> of storage. Infiltration is deemed unsuitable due to the previous land uses and potential for

contaminated and made ground. A bypass separator provides appropriate water-quality treatment in line with the SuDS Manual.

Management and maintenance requirements for the drainage system, including inspection and upkeep of SuDS features and the attenuation tank, are set out in the FRA to ensure the system performs effectively throughout the lifetime of the development.

## 4.7 Minimising water usage

### 4.7.1 Measures

The development will incorporate water-efficient sanitaryware and fittings to minimise potable water consumption in accordance with Policy LP34. Low-flow taps; dual-flush WCs and water-saving shower heads will be specified where feasible.

Water meters will be installed to all units while submeters will be installed to all areas and plant with greater than 10% of water demand. This will facilitate monitoring and efficient management of use.

Landscape planting will include native species, such as mixed native scrub and new tree planting identified within the Biodiversity Impact Assessment. Planting specifications will be developed to align with Policy LP34, aiming to ensure resilience to local conditions and minimise water demand through the use of drought tolerant species, where feasible.

These measures will help reduce demand on local water resources.

## 4.8 Landscaping and biodiversity

### 4.8.1 Measures

The proposals have been developed to deliver measurable biodiversity net gain in line with Policies LP30, LP27, LP28 and LP34 of the Kirklees Local Plan and the council's 'Planning Applications Climate Change Guidance' (2021).

The development will provide new and enhanced green infrastructure, including native mixed scrub and new tree planting, alongside enhancement of the River Colne corridor through culvert naturalisation and riparian habitat creation. These measures will deliver an overall biodiversity net gain of over 10%, with a projected +81.7% uplift in habitat units and +26.9% in watercourse units.

Landscape planting will prioritise native and drought-tolerant species to improve climate resilience and reduce water demand, while areas of vegetation will contribute to surface-water management by intercepting rainfall and slowing runoff to the river. Bee, bird and bat boxes, hedgehog connectivity features and seasonal planting practices will further enhance ecological value and support the Kirklees Wildlife Habitat Network.

## 4.9 Air pollution

### 4.9.1 Measures

In alignment with *4.3 Minimising carbon emissions and waste during construction*, the principal contractor will be required to source local material where feasible to reduce transport-related emissions associated with construction.

The preferred proposals for a fully electric energy strategy for space heating and hot water will ensure there are no on-site fossil fuel combustion sources, thereby avoiding direct emissions of nitrogen oxides or particulates. Where any alternative system is proposed, a low NO<sub>x</sub> standard will be required. Mechanical ventilation systems will be specified where appropriate to maintain internal air quality and occupant comfort.

The Air Quality Screening assessment identifies that modelled predictions of traffic flows exceed the Institute of Air Quality Management (IAQM) & Environmental Protection UK (EPUK) screening thresholds and therefore require detailed assessment. However, sustainable travel is central to the development's vision and will help minimise private car use and associated emissions. Measures set out in the Framework Travel Plan include enhanced pedestrian and cycle connections, secure cycle parking, EV charging provision and comprehensive travel information for residents, staff and visitors. The promotion of walking, cycling, public transport use and car-sharing, supported by incentives and on-site facilities, will help minimise traffic generation and associated impacts on local air quality.

New areas of open space will be created across the site in accordance with Policy LP63, incorporating native planting which may help to improve local air quality and contribute to the wider green infrastructure network.

## 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 published 'Planning Applications Climate Change Guidance' (2021), supporting the council's ambition to mitigate and adapt to the effects of climate change.