

Environmental Standards Statement

8/8A St John Street

Mather & Co Ltd

August 2020

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Client

Mather & Co Ltd

Turley Reference

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1. Introduction

This Environmental Standards Statement reports how the proposed redevelopment of 8/8a St John Street to provide three dwellings accords with local and national sustainable development planning policy.

1.1 Introduction

This Environmental Standards Statement has been prepared by Turley Sustainability on behalf of Mather & Co (the applicant). It demonstrates the range of positive measures incorporated into the proposals to ensure high levels of environmental sustainability performance in accordance with national and local policy objectives.

1.2 Application Site & Surroundings

The application site is approximately 0.045 ha and comprises rectangular plot on the corner of St John

Street, Longworth Street and Artillery Street within Manchester City Centre's St John Street Conservation Area (see **Figure 1**).

The application site currently comprises two three-storey Grade II Listed Buildings and forms the end terrace/corner plot west of Longworth Street and the courtyard to the rear.

1.3 Proposed Development

The planning description is as follows:

"The change of use of 8/8A St Johns from offices (B1) to residential accommodation (C3) and the erection of a new residential dwelling (C3) at the rear of the existing property."

Figure 2 overleaf provides an illustration of the proposed development.

Please note the terms "carbon", "carbon dioxide (CO₂)" and "greenhouse gases (GHGs)" are used interchangeably in this Statement depending on the terminology of referenced documents etc.

Figure 1: Site Location

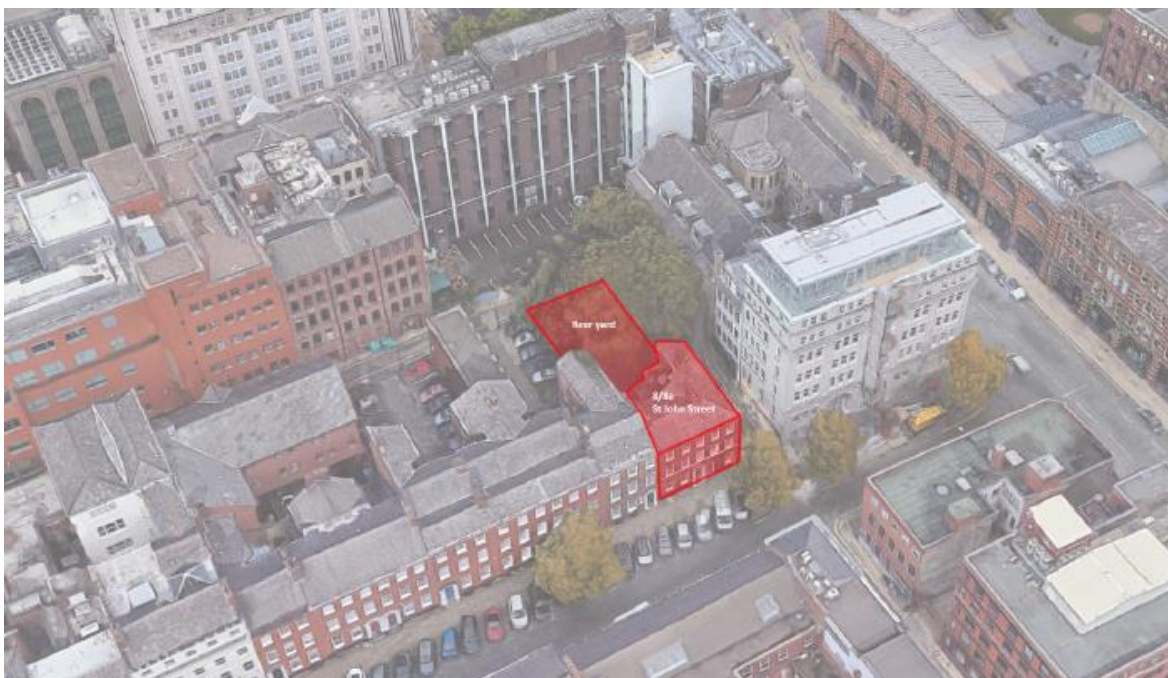


Figure 2: Illustration of Proposed Development (Tim Groom Architects)



2. Planning Policy Context

This chapter summarises relevant national and local planning policy and guidance for residential development in relation to sustainability, energy and climate change.

2.1 National Policy

This section sets out a summary of current national policy and guidance in relation to sustainable development.

2.1.1 National Planning Policy Framework

Updated in February 2019, the National Planning Policy Framework (NPPF) provides the structure for the development of locally-prepared plans, the Government's planning policies for England and how these are expected to be applied.

NPPF paragraph 7 states *"the purpose of the planning system is to contribute to the achievement of sustainable development"*.

The NPPF states that, in order to deliver sustainable development, the planning system must perform three distinct objectives which are aligned to the 'three pillars' of sustainability (see **Figure 2**) which should be pursued jointly rather than in isolation. These objectives are as follows:

An **economic** objective of building a strong, responsive and competitive economy by ensuring sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

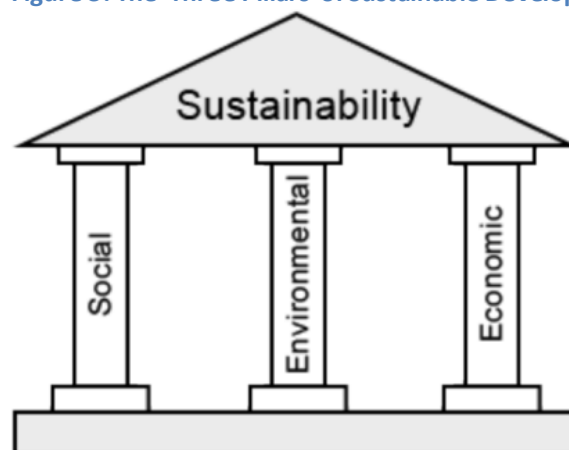
A **social** objective of supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations; and by creating a high

quality built environment with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

An **environmental** objective of protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including supporting the transition to a low carbon economy.

These objectives are key to the preparation of Local Plans and the NPPF sets out a number of key themes to guide Local Plans and their policies in pursuit of sustainable development.

Figure 3: The 'Three Pillars' of Sustainable Development



This Statement relates principally to the above environmental objectives of sustainable development.

2.1.2 Planning Practice Guidance (PPG)

Planning Practice Guidance (PPG) provides guidance on various planning issues associated with development, underpinning policies within the NPPF including those linked to sustainability, energy and climate change.

PPG is also a material consideration in planning decisions and should be followed unless there is clear justification not to do so.

2.1.2.1 National Design Guide

The National Design Guide (October 2019) forms part of the PPG and sets out the characteristics of well-designed places and demonstrates what good design means in practice.



Regarding efficient and resilient resources, the guide explains how well-designed places and buildings conserve natural resources including land, water, energy and materials.

Their design responds to the impacts of climate change such as rising temperatures and increased flood risk, whilst contributing to climate change mitigation through carbon emissions reduction during construction and operation.

2.1.3 Climate Change Act

The amended Climate Change Act (2008) sets a legally binding target for the UK to reduce CO₂ emissions to net zero by 2050, the world's first major economy to do so.

2.1.4 Building Regulations

Whilst not planning policy, in April 2014 the Part L regulations changed and it is now a requirement of the current 2013 Regulations for new homes to deliver a 6% reduction in carbon emissions compared to 2010 Part L. This change aimed to strike a balance between the commitments to reducing carbon emissions and improving energy efficiency and ensuring that the overall effect of regulation upon consumers and businesses does not stifle growth.

The October 2019 Future Homes Standard consultation includes a proposal for Part L standards to be enhanced in 2020 and deliver

either a 20% CO₂ improvement on Part L 2013 through high energy efficiency measures alone (e.g. triple glazing), or a 31% CO₂ improvement through a combination of low carbon heating, on-site low / zero carbon energy technology with lower levels of energy efficiency (e.g. double glazing) which is the Government's preferred option.

2.2 Local Planning Policy

Current and emerging Manchester City Council planning policy relating to sustainable development, energy and climate change is summarised below. Relevant policies of the Revised Draft Greater Manchester Spatial Framework (GMSF) are also introduced.

2.2.1 Manchester Core Strategy Development Plan Document (2012)

Manchester's Core Strategy (July 2012) is the key document in the Manchester Local Plan. It sets out the long-term strategic policies for Manchester's future development and forms the framework against which planning applications are assessed.

The following Core Strategy policies are of greatest relevance to sustainable development and to which this Statement relates.

Policy CC5 – Transport: Developers should work to ensure that all users are able to access development by sustainable means, especially taking account of times when developments are likely to be busiest.

Policy EN4 – Reducing CO₂ emissions by enabling low and zero Carbon Development – Development should be designed in accordance with the energy hierarchy to reduce energy demand through active and passive design measures meeting residual requirements through the use of zero carbon, renewable energy technologies. Developments are encouraged to take into account the following principles:

- Located and designed in a manner that allows advantage to be taken of opportunities for low and zero carbon energy supplies where possible;

- Where possible new development and retrofit projects will be used as a mechanism to help improve the energy efficiency and where possible provide low and zero carbon energy to existing buildings; and
- Where appropriate, new development and retrofit projects are encouraged to connect to and/or make commitments to low or zero carbon energy schemes and/or to incorporate provision to enable future connection to any existing/potential decentralised energy networks.

Policy EN6 – Target framework for CO₂ reductions from low or zero carbon energy supplies – Applications for development over 10 dwellings or 1,000m² floor area are expected to meet sustainability targets which vary depending on the scale of the development, where feasible.

Development that meets the criteria above is required to be accompanied by an energy statement which sets out the projected regulated energy demand and associated carbon emissions and how the following targets will be met. Development below the above thresholds is expected to meet the targets but does not need to have an accompanying energy statement.

For the purpose of this policy, development is split into three target categories:

Target 1 - Network development areas: Locations where the proximity of new buildings, the mix of use and density of development provides the right conditions to support district heating.

Target 2 - Electricity intense areas: Locations where the predominant building type has all electric fit out, such as retail units and leisure complexes.

Target 3 – Micro-generation areas: Locations where lower densities and fragmented mix of uses tend to mean that only building scale solutions are practical.

Table 1: Manchester Core Strategy CO₂ Targets

Target	CO ₂ Reduction
1	CHP/district heating or connection or where not feasible 15% increase on Part L 2010
2	10% increase on Part L 2010
3	15% increase on Part L 2010

An Energy Assessment is required to be submitted, and developers are permitted to use green infrastructure elements to contribute to the carbon reduction requirements provided adequate evidence is provided.

Policy EN8 – Adaptation to Climate Change – All new development is expected to be adaptable to climate change and developments should have consideration of adaptation measures including:

- Minimising flood risk through sustainable drainage systems;
- Reducing the urban heat island effect through green infrastructure;
- Minimising overheating through passive design; and
- The opportunity to provide linked and diverse green space to enhance natural habitats which will assist species adaptation.

Policy EN9 - Green Infrastructure: New development is expected to maintain existing green infrastructure in terms of its quantity, quality and multiple function. Developers are also encouraged to enhance existing green infrastructure where possible.

Policy EN 14 - Flood Risk: Development should be directed away from sites at the greatest risk of flooding, and towards sites with little or no risk of flooding.

Policy EN15 – Biodiversity and Geological Conservation: The Council will seek to maintain or enhance sites of biodiversity and geological value throughout the City.

Policy EN16 - Air Quality: The Council will seek to improve the air quality within Manchester. Developers will be expected to take measures to minimise and mitigate the local impact of emissions from traffic generated by the development.

Policy EN 17 - Water Quality: New development should avoid adverse impact on water quality, including during the construction phase, and minimise surface run-off.

Policy DM1 - Development Management: All new development should have regard to a range of sustainability issues including site location, accessibility, waste management, biodiversity and flood risk, as well as incorporating sustainable construction techniques. For new residential development, the development must meet as a minimum the following Code for Sustainable Homes standards:

Year 2010: Code Level 3

Year 2013: Code Level 4

Year 2016: Code Level 6

2.2.2 Validation Requirements

Manchester City Council Validation Checklist (January 2020) requires applications for major new development to be accompanied by an Environmental Standards Statement to address the sustainability of the development proposals.

2.2.3 Greater Manchester Spatial Framework

The Revised Draft Greater Manchester Spatial Framework 2019 has recently been published for consultation. Relevant emerging policies are as follows:

Policy GMS-1 Sustainable Development:

Development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts and actively seek opportunities to secure net gains across each of the different objectives.

Preference will be given to using previously-developed (brownfield) land to meet development needs.

Policy GM-S 2 Carbon and Energy: The aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, will be supported through a range of measures.

Furthermore, there is an expectation that new development will:

- a) Be zero net carbon from 2028 by following the energy hierarchy (with any residual carbon emissions offset), which in order of importance seeks to:
 - i. Minimise energy demand;
 - ii. Maximise energy efficiency;
 - iii. Utilise renewable energy;
 - iv. Utilise low carbon energy; and
 - v. Utilise other energy sources.

With an interim requirement that all new dwellings should seek a 19% CO₂ reduction against Part L of the 2013 Building Regulations.

- b) Incorporate adequate electric vehicle charging points to meet likely long-term demand;
- c) Where practicable, connect to a renewable/low carbon heat and energy network;
- d) Achieve a minimum 20% reduction in carbon emissions (based on the dwelling emission or building emissions rates) through the use of on site or nearby renewable and / or low carbon technologies; and
- e) Include a carbon assessment to demonstrate how the design and layout of the development sought to maximize reductions in whole life CO₂ equivalent carbon emissions.

Policy GM-S 3 Heat and Energy Networks: The provision of decentralised energy infrastructure is critical to the delivery of Greater Manchester's objectives for low carbon growth, carbon

reductions and an increase in local energy generation. Development should connect to a network where viable.

Policy GM-S 4 Resilience: The development of Greater Manchester will be managed so as to increase considerably the capacity of its citizens, communities, businesses and infrastructure to survive, adapt and grow in the face of physical, social, economic and environmental challenges. Key measures in relation to the latter will include designing indoor and outdoor environments to provide a reduction and respite from more extreme temperatures and winds associated with climate change and greater urbanisation.

2.3 Planning Policy Summary

There are several consistent themes across national and local sustainability policy which are relevant to the development at St John Street.

Local planning policy confirms the Council's commitment to the creation of sustainable new developments in the city.

Ensuring the development is resilient to a changing climate is a further key requirement at both national and local levels, particularly in relation to increased risk of floods and summertime overheating.

As per the Validation Checklist, the following chapters of this Environmental Standards Statement details the response of the development proposals to current adopted policy requirements, with a focus on the issues targeted.

The requirement under Core Strategy Policy DM1 to certify new residential development to the Code for Sustainable Homes is no longer applicable following the revocation of the Code for new planning applications by the 2015 Housing Standards Review.

3. Sustainability Strategy

3.1 Introduction

This chapter summarises the sustainability, energy and climate change measures that are proposed. It follows the topic headings of Chapter 4 ‘Environmental Standards’ of the Guide to Development in Manchester Supplementary Planning Document and Planning Guidance (2007) and includes:

- Energy Efficiency (including renewable energy);
- Environmental Design;
- Water Management & Weather Resilience;
- Waste Management;
- Construction Management; and
- Biodiversity.

3.2 Energy Efficiency

The Energy Statement for the proposed development has been prepared by Zerum. The following summary is based on preliminary energy modelling and strategy completed to date and may be subject to change as part of detailed design.

The proposed Energy Strategy accords with the principles of the “energy hierarchy” (or “fabric first”) approach to energy efficiency in buildings, as described below.

3.2.1 Energy Hierarchy

The “energy hierarchy” (or “fabric first”) approach is recognised as the best approach to integrating energy efficiency and sustainable energy technology into new buildings as cost-effectively as possible (see **Figure 3**).

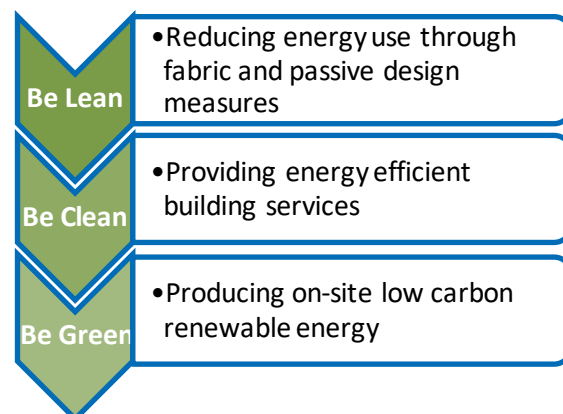


Figure 3: The Energy Hierarchy

3.2.2 “Be Lean”

The first ‘Be Lean’ stage of the hierarchy seeks to reduce the demand for heat and power from the outset through high performance building fabric and passive design measures. This “fabric first” approach has a number of benefits including:

- Carbon savings are ‘locked-in’ for the lifetime of the building (60 years or more) rather than the much shorter typical lifespan (around 25 years) of a renewable energy technology;
- Virtually no maintenance and/or replacement needs /; and
- No reliance on occupier behaviour unlike certain renewable energy technologies.

Table 2 overleaf presents building envelope specifications envisaged for the development alongside the maximum ‘limiting values’ permitted under 2013 Building Regulations Part L.

It can be seen that all anticipated building envelope specifications are an improvement on the maximum backstop values permitted under current Building Regulations.

Table 2: Proposed Building Envelope Specifications

Element	U Value (W/m ² K)	
	Proposed Build	Part L 2013 Limit
External Wall	0.26	0.28
Ground Floor	0.16	0.22
Roof	0.18	0.18

Thermal Mass and Structure

The thermal mass and overall construction of the building fabric can provide a considerable passive design benefit. Thermal mass systems operate on the principle of an energy store, holding energy during periods of excess and then releasing the energy slowly at other times. This feature is strongly recommended as an overheating mitigation factor and it can be accommodated into the scheme if the building fabric choices are correctly made.

3.2.3 “Be Clean”

Once energy demand has been minimised, the second step in the hierarchy is to ensure that remaining demand is met as efficiently as possible by specifying energy efficient building services and equipment. The Energy Strategy for the building proposes the following to minimise energy demand:

- Low energy internal lighting (e.g. LED) installed throughout with automatic controls;
- Highly efficient domestic hot water generating equipment; and,
- Incorporation of heat recovery within mechanical ventilation systems.

Through the provision of fabric and energy efficiency measures it is anticipated the development will reduce energy consumption and carbon emissions beyond the requirements of the Building Regulations.

3.2.4 “Be Green”

The third stage of the energy hierarchy is the provision of low / zero carbon energy technology

to further reduce the energy demand and carbon emissions.

To comply with planning requirements, 20% of the energy demand from the new build scheme associated with the dwelling energy demand shall be from a renewable energy contribution.

Zerum conducted an analysis of low / zero carbon energy technologies as part of the Energy Statement, evaluating that the following are suitable for the site.

Air Source Heat Pump (ASHP)

Air Source Heat Pumps (ASHP) can provide heating (either space heating or hot water) to a building during colder months, as well as cooling during summer months. ASHPs do not have a large spatial requirement and could be utilised to provide space heating and cooling to bedroom and public areas. Were this option to be implemented, it could meet 100% of the new build's thermal demand.

Solar Water Heating

Solar thermal panels can be installed on the roof of a new building to provide domestic hot water. The system uses thermal energy from the sun collected in solar thermal panels on the roof of the building to heat water passing through pipes fixed to the solar plates. This is a viable option although the location of the equipment on the roof can cause planning issues.

Solar PV

Solar PV panels convert solar energy into electrical energy, providing zero carbon electricity to the building. The electricity produced can be used on site or fed back into the national grid. Overall suitability is dependent on the final building form, shape and orientation though in general, photovoltaic cells can be accommodated on almost every building.

3.2.5 Energy Strategy Summary

The Energy Strategy for the proposed development includes a range of measures in accordance with the energy hierarchy to reduce energy demand and carbon emissions. The proposed development will incorporate energy efficiency measures, meeting the planning condition for 6% reduction of the developments CO₂ emissions and 20% of the new builds energy from a renewable source. It includes:

- A fabric-first approach to achieve a highly efficient thermal envelope and reduce primary energy demands;
- The provision of energy efficiency systems including LED lighting, heat recovery and highly efficient hot water generating equipment; and,
- The use of low carbon renewable energy systems including ASHP to provide space heating and cooling, providing a further reduction in CO₂.

Energy performance at this level will ensure the development minimises carbon emissions through the utilisation of the fabric first methodology in accordance with the latest national guidance and reflects the objectives of local and national planning policy.

3.3 Environmental Design

Policy DM1 states that new residential development from the year 2016 onwards should achieve Code for Sustainable Homes Level 6. The Code for Sustainable Homes was withdrawn in 2015 and so this does not apply to the development at St John Street.

Instead, the proposed development will comply with policies of the Greater Manchester Spatial Framework, as demonstrated throughout this report.

Construction Carbon

The refurbishment of the existing building at St John Street is an inherently sustainable and resource efficient approach, significantly reducing the embodied carbon associated with development.

Additionally, the development specification will prioritise high recycled content, low environmental impact and responsible supply chains such as those who hold FSC and BES6001 certification.

For the new build dwelling, the primary external wall material is handmade buff brickwork. Brick is a sustainable and relatively low carbon material selection due to its durability and lack of maintenance / replacement required throughout a building's lifetime. Furthermore, brick is entirely

recyclable. Where possible, the bricks will be procured locally.

Sustainable Transport

The location of the proposed development lends itself well in encouraging the use of active and sustainable modes of transport.

Located in Deansgate, the development is well within walking distance to the city centre and its services and facilities.

The site is extremely accessible via public transport, with the nearest bus stop (Opera House) approximately 100m from the site, Deansgate train station just 400m from the site and the nearest tram stop (Deansgate Castlefield) approximately 320m to the south. These modes give access to the local and regional destinations, with further national destinations easily accessible from nearby train stations.

3.4 Water Management & Weather Resilience

Water management and weather resilience issues in new development are becoming increasingly important as a result of climate change, with effects such as increased winter rainfall, decreased summer rainfall and increased summer temperatures already being experienced.

The Met Office's latest UK Climate Projections (UKCP18) include significant changes to climatic conditions in Manchester by the 2050s, including increased summer temperatures of 2.4°C, 7% more winter rainfall, and 19% less summer rainfall.

A summary of key potential risks faced by Manchester and associated mitigation measures is provided below.

3.4.1 Flood Risk

The proposed development at St John Street sits within Flood Zone 1. The Drainage Strategy prepared by Hydrock indicates that Phase 1 of the development achieves a 50% betterment on the existing brownfield runoff rates. The model indicates that no flooding occurs during a 1 in 100 year plus climate change event within the surface water network. It is assumed that Phase 2, converting existing office space to residential units will reutilise the existing drainage infrastructure.

Several approaches to sustainable drainage systems (SuDS) have been considered as part of the strategy, with below ground attenuation systems incorporated within the design, through the use of attenuation crates.

3.4.2 Potable Water Efficiency

Potable water is an increasingly important natural resource and with the majority of the UK classed as being in an area of moderate or severe water stress the conservation of water is becoming a more significant sustainability metric.

The new development will aim to reduce water consumption through a range of water efficiency measures such as:

- Dual flush WCs;
- Water meters;
- Low flow fittings; and
- Where appropriate, water efficient equipment.

Through the use of these measures new homes will target a water consumption rate of 110 litres per person per day (l/p/d), beyond the baseline requirement of 125 l/p/d and significantly below the UK average of 150 l/p/d.

These measures will help ensure the development reduces demand on local potable water supplies and therefore promote resilience to potential water constraints such as summer droughts.

3.4.3 Overheating

Each occupied room will have window opening areas to assist ventilation and minimise summertime overheating risk. In addition, the inclusion of thermal mass and structure is strongly recommended as an overheat mitigation factor, as outlined in **Section 3.2**.

3.5 Waste Management

3.5.1 Construction

Prior to the commencement of construction, a Construction Environmental Management Plan (CEMP) will be developed to ensure the use of measures to minimise waste during the construction phases of the development, including the use of a scheme for recycling/disposing of

waste arising from demolition and construction works.

The reduction, reuse and recycling of construction waste is to be prioritised through measures such as avoidance of over-ordering, supervision of deliveries, use of secure materials storage facilities and reuse of materials onsite where feasible.

In addition the development will be registered with the Considerate Constructors Scheme and achieve certification against the Code of Considerate Practice.

3.5.2 Operation

In accordance with the principles of the waste hierarchy, the development will make provision for the storage of non-recyclable waste and recyclable waste including dedicated storage for waste in new homes to encourage residents to recycle waste materials. Each garden will have an area allocated for the storage of four 240 litre bins. These are located close to the rear kitchen door of each property for convenient access. Should any further capacity be required, there is sufficient space for these to be stored in the area allocated.

Full consideration will be given to the Council's waste management infrastructure and services to ensure that the occupiers have the necessary infrastructure to participate in kerbside recycling services along Longworth Street.

3.6 Construction Management

The proposed development will ensure that construction is undertaken in a way which minimises waste and impact on the surrounding area.

The Contractor will implement best practice pollution prevention policies and procedures on-site.

The development aims to use materials with a low environmental impact where viable. Insulation materials with low Global Warming Potential (GWP) and zero Ozone Depleting Potential (ODP) will be specified.

3.7 Biodiversity

An Ecological Assessment undertaken by ecus in July 2020 has established the existing ecological status of the site and assessed the impact of the proposed development.

The site is not covered by any statutory or non-statutory biodiversity designation, nor or any such designations located in proximity to the site. The nearest designation is the Cliff/Kersal Dale Local Nature Reserve, located approximately 3.5km to the north.

The current ecological constraints identified for the site involve bats and birds. The main building on the site has been assessed to have moderate potential to support roosting bats, and it is possible that common and widespread bird species may nest in trees and denser shrubs within the site.

3.7.1 Mitigation Measures

The following recommendations have been made for the avoidance and mitigation of potential effects:

- The presence of a licensed ecologist to supervise renovation/demolition works and confirm the presence/absence of bats prior to any potential roost disturbance;
- Light spill will be minimised to reduce potential impacts on light-sensitive bats;
- Vegetation clearance, should it be required during the nesting bird season, should be checked for active nests by an ecologist before work begins.

3.7.2 Ecological Enhancements

The following enhancement measures will be incorporated into the development to enhance site habitats and species:

- The creation of new habitats, either as additional landscaping schemes or within the building as green roofing and living walls is encouraged; and
- The installation of bat and bird boxes within the trees outside the building or within the buildings.

The redevelopment at 8/8a St John Street will deliver three efficient and sustainable new homes in accordance with local and national planning policy

4. Conclusion

This Environmental Standards Statement demonstrates how the proposed redevelopment at 8/8a St John Street meets national and local planning policy in relation to sustainability, energy and climate change.

This Environmental Standards Statement demonstrates how the proposed development will deliver sustainable, resource efficient homes through a wide range of measures which are summarised below.

Energy Efficiency

The Energy Statement prepared by Zerum has confirmed that the proposed development will incorporate energy efficiency measures, meeting the planning condition for 6% reduction of the developments CO₂ emissions and 20% of the new build's operational energy from a renewable source. The performance of the buildings will be achieved through application of the "energy hierarchy" including excellent levels of building fabric performance, energy efficient building services and the provision of on-site low / zero carbon energy technologies such as air source heat pumps.

Environmental Design

The proposed development has reduced embodied carbon through the reuse of the existing building

on St. John Street and specification of sustainable materials such as brick. Responsible supply chains and materials with recycled content will be prioritised within the specification.

The site is in an excellent location for sustainable travel as an alternative to private car travel. The occupiers will be able to make use of local bus, tram and train services for local, regional and national travel.

Water Management and Weather Resilience

The application site is at low risk of flooding and the development will make use of SuDS to ensure that risk of flooding is not increased.

Waste Management

Construction phase waste management and appropriate operational waste storage will help ensure the development contributes to waste recycling targets and minimises the amount of waste sent to landfill.

Construction Management

The proposed development will ensure that construction is undertaken in a way which minimises waste and impact on the surrounding area. The Contractor will implement best practice pollution prevention policies and procedures on-site, in accordance with Pollution Prevention Guidelines.

Biodiversity

There will be a provision of measures to protect onsite ecology and enhancement measures to increase site biodiversity such as a courtyard garden and green roof.

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