



info@southyorkshireclimatealliance.org.uk

3 August 2022

Dear Ms Carrington,

22/00981/FUL: The Mount, Glossop Road, Sheffield S10 2AF: Submission from South Yorkshire Climate Alliance (SCA) August 2022

South Yorkshire Climate Alliance (SCA) is an alliance of local organisations and individuals who are pressing for fair and effective action to tackle climate change. SCA OBJECTS to this application as it stands because there is insufficient evidence of features for tackling climate change – either mitigating the change or adapting to its impacts.

The Design and Access Statement has no consideration at all of the need to mitigate climate change and adapt to its impact, nor does it provide any detail relating to either the climate requirements of the National Planning Policy Framework (NPPF sections 2 and 14), the Sheffield City Council goal of reaching net zero by 2030, or the way in which the development would impact on Sheffield's carbon budget.

While the Sustainability Statement does have some mention of climate change, it could go so much further. Although it rightly points to the sustainability of the location in terms of travel, and rightly points out that re-using buildings can contribute to the UK target of being carbon neutral by 2050, it neglects to explore how, by designing in sustainability features, that contribution could be so much bigger.

The sustainability features that should be, but don't appear to be, designed in to the refurbished buildings include:

- Insulation: ideally to Passivhaus standards, or at the least to EnerPHit standards https://www.passivhaustrust.org.uk/competitions_and_campaigns/passivhaus-retrofit/;
- Renewable and low carbon energy sources – solar panels on roofs (behind parapets as well as on Building B), ground source or air source heat pumps;
- Green walls to the car park;



South Yorkshire Climate Alliance (SCA) is supported by a grant from the National Lottery Community Fund

- Rainwater harvesting, and if possible grey water recycling;
- Electric charging for cars and bikes;
- Heat baffles or external shutters to guard against excess future summer heat;
- External clothes drying areas.
- Cycle parking is inadequate. The number of spaces needs to equate to at least the number of residents, and be at ground level: double stacked cycle parking is inappropriate for electric bikes because of their weight, and for cargo bikes used, for example, to carry children or large objects.

SCA believes that the following are material considerations that would make it justifiable to ask for strict climate measures to be introduced into this application, were it to be approved:

- Planning has an obligation to consider climate change. The Planning and Compulsory Purchase Act 2004 (PCPA 2004) Section 19 set a duty for Local Planning Authorities (LPAs) to consider how to mitigate climate change and adapt to its impacts. The Ministry of Housing, Communities and Local Government (MHCLG) has established the National Planning Policy Framework (NPPF), which sets a policy presumption in favour of sustainable development: one objective of this is mitigating and adapting to climate change (NPPF Sections 2 and 14, February 2019). The Planning System should therefore be trying to ensure that new buildings do not add to carbon emissions – they should be zero-carbon or even carbon negative. This last point would be justified to offset the carbon embedded in building materials, the emissions stemming from the development process, and the fossil fuel emissions associated with the building during its use; it could be achieved by having designs that feature renewable energy and heat, or carbon sinks, in addition to using zero-carbon construction methods.
- In 2019 the UK Parliament declared a Climate Emergency and Government legislated for the UK to reach net-zero carbon by 2050 (Climate Change Act 2008 (2050 Target Amendment) Order 2019).
- Sheffield City Council (SCC) went further: it declared a Climate Emergency in February 2019, and is aiming for Sheffield to reach net-zero carbon by 2030.
- In 2016, the UK Government signed the Paris Agreement, within the UN Framework Convention on Climate Change. This aims to keep global warming well below 2C and commits Governments to undertaking rapid emissions reductions. The legally



binding agreement was adopted at the Conference of the Parties (COP21) in December 2015.

- The Committee on Climate Change (CCC) has recommended that buildings need to be fully decarbonised, saying that ‘...the UK’s legally-binding climate change targets will not be met without the near-complete elimination of greenhouse gas emissions from UK buildings...’

In principle we have no objection to the re-use of this building for residential use; and on grounds of carbon accounting, it is preferable that buildings should be re-used rather than demolished and rebuilt. We are not commenting on the scale of the development, other than to say that creating 55 apartments would seem to us to be over-development. Neither are we commenting on the heritage impacts of the proposals, other than to say that sustainability features are able to be incorporated into heritage properties, as evidenced by bodies such as the National Trust (and ‘greening’ the existing, underground car park would help to hide this ugly structure). In any case, the listed building forms only part of the development. Moreover, we believe that, at a time of climate change, society needs to consider what heritage we are leaving for future generations as well as protecting historical heritage assets. This development could act as an exemplar retrofit of a heritage asset, and SCC should insist on features that will help society to both combat and adapt to climate change.

South Yorkshire Climate Alliance August 2022

info@southyorkshireclimatealliance.org.uk



South Yorkshire Climate Alliance (SCA) is supported by a grant from the National Lottery Community Fund