

Energy & Sustainability Statement

Unit A Finlan Road,
Stakehill Industrial Estate,
Middleton, M24 2SJ

Issued: August 2025

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Report Title	Energy & Sustainability Statement
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About Us

Lucion Delta-Simons is part of Lucion, a technology-led environmental services company dedicated to protecting people and the planet. With expert advice, guidance, and a comprehensive array of services, we support you at every stage of your asset lifecycle, helping you mitigate regulatory impact, improve business practices, and ensure safety and environmental protection.

As part of Lucion's group of companies, we can support you with a broader range of holistic services. Through our pool of multidisciplinary experts, we help you navigate complex regulatory frameworks, saving you time and money.

Being part of your sustainable supply chain is a key goal for our team. As a member of the UN Global Compact and a commitment to sustainability, we are the partner of choice for businesses looking to make informed decisions and mitigate risks across your portfolio.

Lucion is carbon neutral. We annually measure and report our Scope 1, Scope 2 and specified Scope 3 carbon emissions, and offset 100% of residual emissions through verified carbon credits, supporting carbon reduction and prevention projects overseas. We are taking steps to reduce our carbon emissions and have committed to setting and achieving near-term and Net Zero Science-Based carbon reduction targets in line with the goals of the Paris Agreement to limit global warming to 1.5°C above pre-industrial levels. Lucion is a signatory of Pledge to Net Zero and Members of the United Nations Global Compact.

If you would like support in understanding your carbon emissions, or those of your supply chain, please get in touch with your Lucion contact above who will be happy to help.

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1.0 Introduction

1.1 Appointment

- 1.1.1 Lucion Delta-Simons Limited ("Lucion") was instructed by UBS Triton Property Fund (the "Client") to carry out an Energy and Sustainability Statement for Unit A Finlan Road, Stakehill Industrial Estate, Middleton, M24 2SJ (the "Site"), to inform a planning application for the proposed demolition of existing single storey extension and service yard canopy, erection of extension and alterations to existing building, change of use to allow a flexible use within Classes B2, B8 and / or E(g)(iii) and a series of physical works to reconfigure the site including an extension to the service yard, new hard and soft landscaping and associated infrastructure.

1.2 Context & Purpose

- 1.2.1 It is understood that these services are required to meet the requirements of Rochdale Metropolitan Borough Council's Adopted Core Strategy Local Plan, with particular attention to Policies G1, G2 and G3.
- 1.2.2 Local planning policy requires the Client to provide an Energy and Sustainability Statement in support of the Proposed Development, outlining the intended approach to climate change and sustainability related planning policy.

1.3 Project Background

- 1.3.1 The Site currently comprises an 'L' shaped building which was formerly used for the manufacturing and distribution of car seats. Two service yards are located in the north and south of the Site respectively, with car parking located in the west and isolated areas of soft landscaping. The Site is located within a mixed commercial / light industrial area which forms the Stakehill Industrial Estate.
- 1.3.2 The aim of this Statement is to support the submission of a planning application for the proposed demolition of existing single storey extension and service yard canopy, erection of extension and alterations to existing building, change of use to allow a flexible use within Classes B2, B8 and / or E(g)(iii) and a series of physical works to reconfigure the site including an extension to the service yard, new hard and soft landscaping and associated infrastructure.
- 1.3.3 The proposed development will be located at Unit A Finlan Road, Stakehill Industrial Estate, Middleton, M24 2SJ. The location and proposed layout of the Site are shown in Figures 1 and 2, respectively.
- 1.3.4 Data sources, which inform this report can be found in Appendix A. Standard limitations associated for the report are presented in Appendix B.

Figure 1. Proposed Location

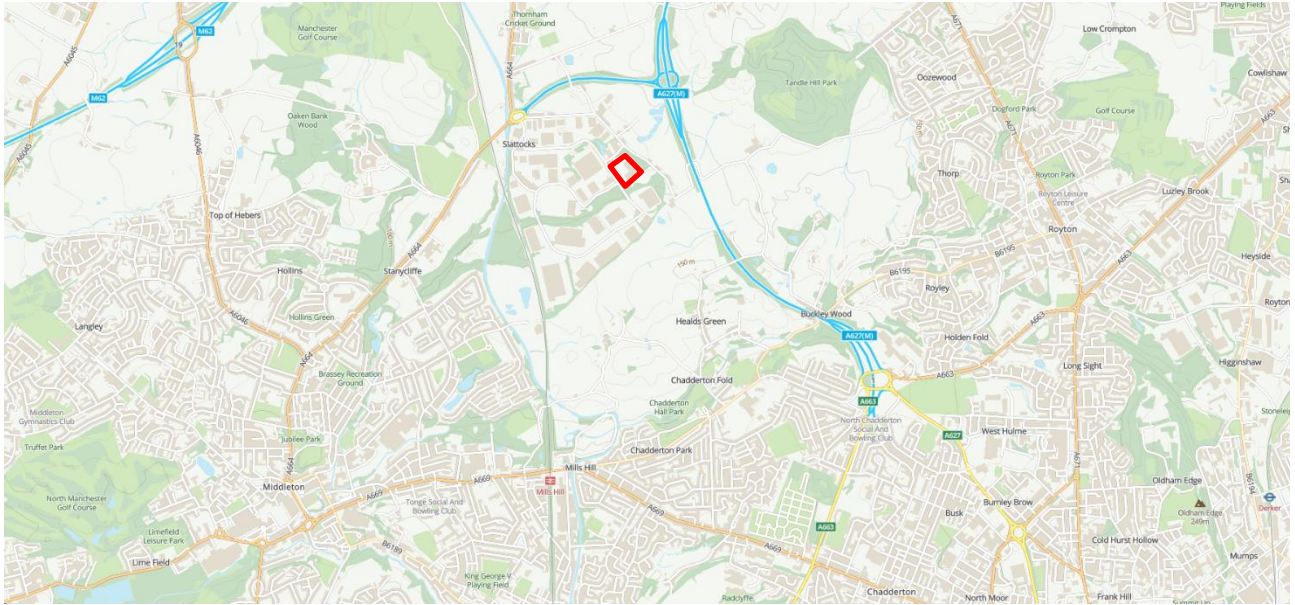


Figure 2. Proposed Site Layout



2.0 National Planning Policy

2.1 General Commentary

- 2.1.1 The relevant planning and dedicated sustainability policy documents that promote themes of sustainable development have been summarised below. The following policies are applicable to the proposed Site and form the basis of Delta-Simons' Sustainability Statement.

2.2 National Planning Policy Framework (NPPF)

- 2.2.1 This version of the National Planning Policy Framework was amended on 7 February 2025 to correct cross-references from footnotes 7 and 8, and amend the end of the first sentence of paragraph 155 to make its intent clear. For the avoidance of doubt the amendment to paragraph 155 is not intended to constitute a change to the policy set out in the Framework as published on 12 December 2024. This revised framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018, updated in February 2012, revised in July 2021, updated in September 2023 and revised in December 2023.
- 2.2.2 The NPPF outlines the Government's planning policies for England. It provides a framework within which local people and accountable councils can produce their own distinctive local plan which reflect the needs and priorities of their neighbourhoods and communities. The purpose of the NPPF is to contribute to the achievement of sustainable development.
- 2.2.3 The National Planning Policy Framework (NPPF) in the UK aims to establish a single, streamlined document that sets out the government's planning policies for England and how these should be applied. However, the NPPF also outlines that sustainable developments require careful attention to viability and costs in plan-making and decision-taking processes. Over everything else, plans should be deliverable. Therefore, the sites and scale of development within the plan should not be subjected to large scale obligations and burdens, so that their ability to be developed viably is threatened.
- 2.2.4 The NPPF guidance promotes planning for climate change. Chapter 14 of the NPPF, Meeting the Challenge of Climate Change, Flooding and Coastal Change (paragraphs 161 to 186) states that:

Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

New development should be planned for in ways that:

- *Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*
- *Can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.*

To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- *Provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
- *Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*
- *Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.*

Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

In determining planning applications, local planning authorities should expect new development to:

- *Comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*
- *Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.*

When determining planning applications for renewable and low carbon development, local planning authorities should:

- *Not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and*
- *Approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.*

3.0 Summary of Local Planning Policy Requirements

3.1 Rochdale Borough Council Core Strategy (adopted 2016)

- 3.1.1 Rochdale Borough Council's Core Strategy, adopted in October 2016, incorporates multiple key policies relating to the environment and sustainability.
- 3.1.2 The Core Strategy addresses the Climate Change within which, Policies G1, G2 and G3 address how developments can promote a greener environment.
- 3.1.3 The following policies are relevant to the Sustainability Statement and have therefore been summarised below:

G1 - Tackling and Adapting to Climate Change

We will address climate change and ensure growth does not increase CO₂ emissions by:

- *Locating growth in areas which are likely to minimise the need for travel and which are well served by public transport, services and infrastructure;*
- *Expecting all development and regeneration schemes to be well connected to surrounding areas and facilities by sustainable means of transport (Policy T2);*
- *Encouraging and promoting renewable energy developments, including standalone and community developments, that do not, by virtue of their scale, siting, construction or operation, cause harm to the local area, its character and environmental assets and adjoining uses, which cannot be satisfactorily mitigated (Policy G3);*
- *Promoting the efficient re-use of buildings, especially those of heritage value, and the recycling of construction waste;*
- *Ensuring that development does not cause unacceptable harm to the borough's peatlands and woodlands, and encouraging their restoration and responsible management;*
- *Promoting sustainable waste management through the operation of policies in the Core Strategy and Greater Manchester Joint Waste Plan;*
- *Making the best use of open space to contribute to climate change mitigation and adaptation; and*
- *Securing planning obligations for energy infrastructure and climate change adaptation measures.*

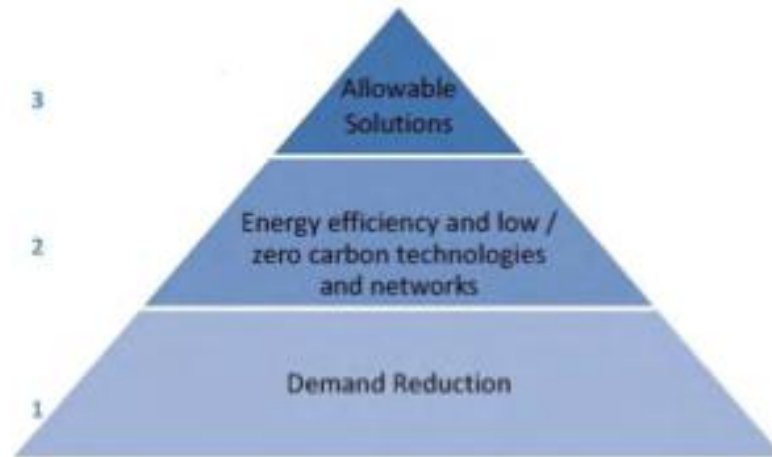
New developments will be expected to:

- a. *Be zero carbon in line with national targets and definitions;*
- b. *Adhere to the 'energy hierarchy' as outlined in policy G2, being designed in such a way that ensures that buildings require the minimum amount of energy to function over their lifetime;*
- c. *Reduce CO₂ emissions through the use of renewable and low carbon decentralised energy technologies and networks. This will be through both on-site provision in new developments and through connection to local networks;*
- d. *Address the impacts of climate change by incorporating comprehensive adaptation measures, including:*
 - i. *suitable measures, such as urban greening, for tackling the 'urban heat island' effect;*
 - ii. *where possible, the opening up of covered and culverted sections of waterways and provision of new water features, to help cooling and provide biodiversity, landscape and flood prevention benefits;*
 - iii. *the incorporation of appropriate water conservation and management measures, such as Sustainable Drainage Systems (SuDS), including ensuring that the rate of run-off on 'greenfield' sites is not increased and on 'brownfield' sites is significantly reduced, and avoiding the use of impermeable surfaces;*

- iv. the retention of existing trees wherever possible and the taking of all appropriate opportunities to plant trees and other suitable vegetation on site; and
- v. the incorporation of 'green roofs' wherever possible, such as with flat roofs.

G2 - Energy and New Development

All new development will be expected to adhere to the following energy hierarchy to the extent that policy G2 reflects national policy, targets and requirements for that type of development:



Rochdale Metropolitan Borough Council Core Strategy (2016)

1. *Demand Reduction* - Achieve the maximum possible reduction in demand for energy through building design (i.e., the use of passive systems). At the design stage of new developments, every effort should be made to ensure that buildings use as little energy as possible throughout their lifetimes, using siting, orientation, layout, construction and landscaping to optimise use of natural passive systems such as solar gain and natural lighting, shading, ventilation and cooling to minimise heating, cooling and lighting demands. Green roofs and green walls should be incorporated into developments wherever feasible.
2. *Energy efficiency and low / zero carbon technologies and networks* - Design to maximize energy efficiency and use on-site or linked low or zero carbon technologies or direct connection to a low or zero carbon heat source (not necessarily on-site).
3. *'Allowable solutions'* - use wider energy efficiency/CO₂ reduction measures, which could include developer contributions, to compensate for 'residual emissions' not addressed by 1 or 2 above.

G3 - Renewable and Low Carbon Energy Developments

The Council will promote renewable, low and zero carbon energy generating developments, including wind power, biomass, Combined Heat and Power (CHP), hydro and heat pumps in order to help meet CO₂ reduction targets and contribute towards energy security for Greater Manchester and the Northwest.

Any proposal and associated infrastructure must avoid harm to the health and safety of the public, including through nuisance or adverse impact on highway safety by conflict with or undue distraction to road users. Any harm to the following must be minimised and appropriately mitigated:

- The visual character and quality of the landscape or townscape and the physical record of the historic and cultural evolution of the landscape;
- The setting of heritage assets including Scheduled Ancient Monuments, Conservation Areas and Listed Buildings;

- *Local residents and their amenity;*
- *Biodiversity including protected species, statutory and locally designated sites and important habitats, and geodiversity;*
- *The value of the borough's peatlands as an ecological and hydrological resource and as a carbon sink;*
- *The value of the surrounding area for relaxation and recreation;*
- *Water quality;*
- *Land which is used for water catchment purposes, and which is critical to the delivery of water supply; and*
- *Highway safety.*

Any proposal must demonstrate the best use of location, topography, siting, design and colour to minimise its visual and other impacts, including any cumulative impacts. Any ancillary structures and access roads should employ sensitive design and the use of local materials to respect the character and appearance of the setting. The visual impact of infrastructure associated with renewable energy developments should be satisfactorily addressed, including by routing power lines underground wherever possible. All proposals should seek to minimise the length of cable connection in order to reduce the visual impact of such structures when sited above ground. It must be demonstrated that the proposal will not result in electro-magnetic interference with local television reception and specialist radio communication networks.

All the above issues, where relevant, will have to be addressed in a detailed statement of environmental effects submitted with the application.

Planning permission will be subject to a condition that if a wind turbine generator, or other redundant plant or infrastructure, is not producing electricity for six months or more, it shall be removed, and the site fully restored to a use and condition appropriate to its surroundings in accordance with this plan.

In the case of wind power developments, in addition to the above criteria the following will also apply.

Planning permission will only be granted if:

- *The development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and*
- *Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.*

3.2 Greater Manchester's Places for Everyone

- 3.2.1 Places for Everyone (PfE) is a joint development plan for nine Greater Manchester local authorities (excluding Stockport) that establishes a strategic framework for sustainable growth through 2037. Published in July 2021, submitted in January 2022, and adopted in August 2024, it replaced the previous Greater Manchester Spatial Framework.
- 3.2.2 The plan aims to create thriving communities by addressing housing needs (164,880 new homes), enabling inclusive economic growth, protecting green spaces, improving infrastructure, and supporting climate resilience goals. It provides coordinated policies on housing, employment, green infrastructure, carbon reduction, and integrated transport across the participating districts.
- 3.2.3 Greater Manchester's Places for Everyone (PfE) policy framework includes several core components that directly relate to energy and sustainability projects:

Carbon Reduction and Climate Resilience:

- *Policy JP-S1 requires developments to be net zero carbon by 2028*

- *Emphasizes following the energy hierarchy: reducing energy demand, maximizing energy efficiency, utilizing renewable energy, and using low carbon energy sources*
- *New developments must demonstrate climate resilience and adaptation strategies*

Sustainable Energy Infrastructure:

- *Policy JP-S2 encourages decentralized energy networks and district heating*
- *Promotes renewable and low carbon energy schemes*
- *Requires high energy performance standards in new buildings*
- *Supports energy storage solutions and smart energy systems*
- *With respect to renewable energy generation, priority should be given to PV installation where technically feasible, alternative technologies may be considered in instances where the equivalent generation is evidenced.*
- *Non-residential developments should achieve at least BREEAM excellent standard (or equivalent) for the 'Ene 01 – reduction of energy use and carbon emissions' category rising to 'BREEAM outstanding' equivalent for ENE 01 from 2028.*
- *A detailed energy statement is required to demonstrate via site relevant evidence how the development meets policy expectations for carbon reduction. Climate adaptation should be addressed through an assessment of overheating risks and through the adoption of post occupancy evaluation measures. A Whole-Life Cycle approach to avoided emissions should be considered wherever possible.*
- *Developments should explore opportunities to connect to existing heat networks where feasible, identifying viability of integration in order to enhance energy efficiency and reduced carbon emissions. Where a connection to existing networks is not presently feasible, developments should be designed to enable future connections to heat networks as they expand.*

Resource Efficiency:

- *Policy JP-S7 focuses on circular economy principles and sustainable waste management*
- *Encourages use of sustainable materials and construction methods*
- *Promotes water efficiency measures and sustainable drainage systems (SuDS)*

Green Infrastructure:

- *Policies JP-G2 through JP-G7 emphasize integration of green spaces and nature-based solutions*
- *Supports urban greening to reduce urban heat island effects*
- *Enhances biodiversity net gain requirements*

Sustainable Transport:

- *Policy JP-C1 promotes development that reduces the need for travel*
- *Encourages active travel modes and public transport connectivity*
- *Supports electric vehicle charging infrastructure integration*

Air Quality:

- *Policy JP-S6 requires developments to minimize air pollution and contribute to improving air quality*
- *Encourages design solutions that address air quality concerns*
- *These components provide a framework for Energy & Sustainability Statements to demonstrate alignment with Greater Manchester's strategic environmental and sustainable development*

objectives, showing how projects will contribute to the region's carbon neutrality targets while creating resilient, healthy, and sustainable places.

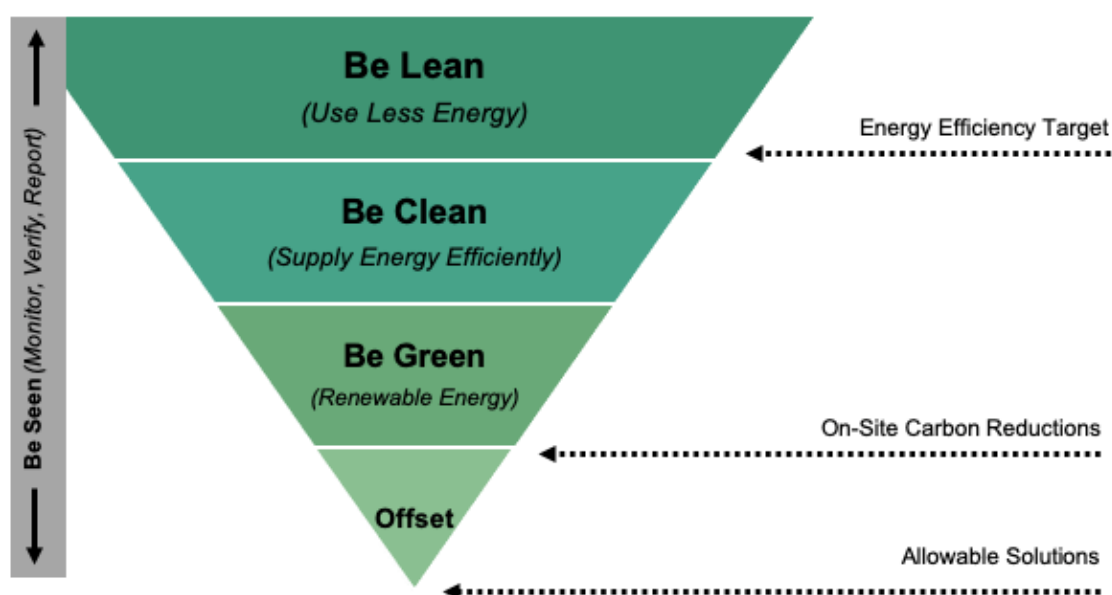
4.0 Energy Statement

4.1 The Energy Hierarchy

4.1.1 The energy hierarchy is generally accepted as the most effective way of reducing building carbon emissions. This is highlighted and recognised in the energy hierarchy, which promotes the following principles:

1. Be lean: use less energy;
2. Be clean: supply energy efficiently;
3. Be green: use renewable energy;
4. Be seen: monitor, verify and report on energy performance.

Figure 3. The Energy Hierarchy



- 4.1.2 **Reducing Energy Demand:** The first step in the process of reducing the overall energy used and CO₂ produced by the building is to minimise the energy required to heat it. A well-insulated building envelope and passive design will reduce the energy requirement for heating and ventilating the building.
- 4.1.3 **Energy Efficient Systems:** The second step is to specify services and controls, lighting and appliances that are energy efficient and which result in further reduction in energy requirements.
- 4.1.4 **Supply Energy Efficiently:** Beyond reduction in energy demand, the supply of clean energy can help to reduce the impact of a proposed development. This can include the use of combined heat and power (CHP) for heating and hot water or connection to a local heat network.
- 4.1.5 **Making Use of Low or Zero-Carbon (LZC) Technologies:** When the energy demand has been reduced by implementing the processes of improving the fabric and energy efficiency, then LZC technologies can be employed to reduce the environmental impact of the remaining energy consumption.
- 4.1.6 **Monitoring and Reporting:** Ensure comprehensive monitoring and reporting of energy demand and carbon emissions. Major developments are required to undertake this process for at least five years.

4.2 Be Lean - Calculating Baseline Energy Demand

- 4.2.1 The first step is to calculate a Building Regulations compliant specification to establish baseline emissions for the development. SBEM Calculations are used to demonstrate the compliance of new build commercial and residential properties as required by Part L2 of the Building regulations. Calculations were made using the government's national calculation method to complete the required BRUKL report, which accounts for building services and materials. The building Emissions Rate (BER) and Target Emissions Rate (TER) can then be established.
- 4.2.2 The baseline emissions and energy consumption resulting from the SBEM modelling for the Site is shown in the table below.
- 4.2.3 The SBEM requirements include two sets of calculations, Proposed and Notional. Proposed is the calculation of the BER and BPER from the building as proposed, whereas the notional calculation concerns the emissions from a 'notional' building of the same area but with standard set U-values for the building fabric and M&E efficiencies.
- 4.2.4 The BER and BPER of the 'Proposed' building have been calculated and compared with the BER and BPER of the 'Notional' building.
- 4.2.5 The two BRUKL Output Documents (Proposed and Notional) can be used by Building Control to confirm compliance with current Building Regulations by comparing both BER's and BPER's.
- 4.2.6 Compliance is achieved only if the BER and BPER of the Proposed is less or equal to the BER and BPER of the Notional. There is no requirement for the BER to be less than the TER in this instance or the BPER to be less than the TPER.

Table 1. Baseline Energy

Total Annual Part L2 Baseline Regulated Emissions & Fabric Energy Efficiency			
SBEM Calculation Type	Proposed	Notional	+/- %
Building CO₂ Emission Rate (BER) (kgCO ₂ /m ² /year)	7.34	7.63	-4.0%
Building Primary Energy Rate (BPER) (kWh/m ² /year)	79.55	82.86	-4.2%

- 4.2.7 The strategic aim is to reduce carbon emissions and energy demand overall, so that while planning decisions and monitoring requirements will be underpinned by the targets expressed above, the requirement for energy assessments to include separate details of unregulated emissions is to recognise explicitly the additional contribution that can be made through use of efficient equipment, building controls and good management practices.
- 4.2.8 In order to comply with Part L2 of the Building regulations, the BER and BPER values highlighted by the Proposed BRUKL assessment is required to be less or equal to the BER and BPER of the Notional, therefore, the proposed development is compliant with current Building Regulations.
- 4.2.9 The BRUKL reports for the energy models used within this section can be found in Appendix C of this report.

4.3 Be Lean - Energy Efficiency Measures

- 4.3.1 The first two steps of the energy hierarchy require the reduction of energy consumption in the building through improvements to its fabric and by maximising the efficiency of the building services; to be 'lean'. This reduces the energy demand to run the building and thus the emissions associated with that energy use. Part L2 is already very stringent in terms of minimum fabric and mechanical services performance targets, but further improvements are possible by considering the following steps:
- Reduce elemental U-Values;
 - Reducing heat loss through uncontrolled ventilation (air leakage);

- Increased control of necessary ventilation; and
- Improving mechanical & electrical system efficiency.

4.3.2 A summary of the specification assumed in the Lean and Clean model is shown the table below.

Table 2. Building Fabric Specifications

Element Type	Ui-Calc	Ua-Limit
Walls	0.41 W/m ² K	Max. 0.26 W/m ² K
Floors	0.38 W/m ² K	Max. 0.18 W/m ² K
Pitched roofs	-	Max. 0.16 W/m ² K
Flat roofs	0.39 W/m ² K	Max. 0.18 W/m ² K
Windows and roof windows	1.60 W/m ² K	Max. 1.60 W/m ² K
Rooflights	2.70 W/m ² K	Max. 2.20 W/m ² K
Personnel doors	1.60 W/m ² K	Max. 1.60 W/m ² K
Vehicle access & similar large doors	1.44 W/m ² K	1.3
High usage entrance doors	-	3
Air Permeability	15 m ³ /hr.m ²	Max. 8.00 m ³ /hr.m ²

4.3.3. The building fabric proposed for all units do not better the maximum U-value (W/m²K) and air permeability (m³/hr.m²) requirements established within current ADL2building regulations for construction.

4.3.4 As the proposed development concerns the extension to an existing building, as opposed to the construction of a new building, the U-values of the proposed development's building fabric is permitted to be over and above the Ua-limit as long as the BER and BPER values are lower or equal to the Notional BER/BPER values.

Table 3. Building Systems Specifications

Element Type	Proposed Efficiency	Standard Efficiency
VRF System - MVHR	Heating 4.00 Cooling 5.00 SFP 1.60 W/(l/s) HR 0.75	Heating 2.50 Cooling N/A SFP 2.00 W/(l/s) HR N/A
Domestic Hot Water	1.00	1.00
Lighting	100 lm/W	95 lm/W

4.3.5 The heating, cooling, hot water and lighting systems that are currently proposed on site all better or equal the current Building Regulations and are therefore compliant.

4.4 Be Clean - Supply Energy Efficiently

4.4.1 The energy hierarchy requires that connection to decentralised energy networks such as district heating or combined heat and power (CHP) be considered.

4.4.2 For district heating to be viable, an existing network connection would need to be located close to the site.

4.4.3 No allowance has been made for development of a decentralised heat network at the site.

4.4.4 No existing or planned heat networks are currently available at or near to the site to facilitate connection to a heat network.

4.5 Be Green - Renewable Energy and Electric Vehicle (EV) Charging

- 4.5.1 Renewable energy systems have been considered during the design process.
- 4.5.2 To make provision for future solar installation, the Site design should consolidate equipment (HVAC, Electric, Gas Lines, Hydrogen Lines, Drain Lines, etc.) as much as possible without adding substantial cost to ancillary connections or impacting equipment efficiency.
- 4.5.3 The proposed design makes an allowance for electric vehicle charging points. It is understood that 9no. 7kW active car charging points will be installed on-site.

5.0 Sustainability Statement

5.1 Management

- 5.1.1 The development will utilise modern methods of construction to achieve its sustainability objective and encourage best practice in building delivery. Where feasible building elements will be designed for adaptability and off-site fabrication which will support the reduction of on-site wastage.
- 5.1.2 Waste mitigation measures for the construction stage are further addressed within a separate Waste Management and Minimisation Statement.
- 5.1.3 Consultation between the stakeholders, including the architect, client and local authority will ensure that all key sustainable design requirements are met.
- 5.1.4 Best practice will be used during construction so as to reduce the impact of works on the surrounding environment and a commitment will be made to register the site with the Considerate Contractors Scheme.
- 5.1.5 The construction site will be managed so as to reduce resource use, energy for site operations, water consumption, waste and pollution.
- 5.1.6 A system of monitoring, target setting and reporting will be put in place to ensure standards are met.
- 5.1.7 A system of commissioning will be instigated by the design team to ensure that all installed M&E plant is fully commissioned on installation.

5.2 Health and Wellbeing

- 5.2.1 The sustainability objective will encourage the provision of comfortable spaces which promote healthy environments and will be adaptable to changing needs for health and wellbeing.
- 5.2.2 No on-site burning will be permitted during construction and construction and emissions of dark smoke will be avoided in an effort to preserve air quality.
- 5.2.3 Finishing elements will be chosen which do not contain harmful chemicals such as VOCs and formaldehyde.
- 5.2.4 Optimum levels of thermal comfort and acoustic performance will be promoted in line with standards for best practice.
- 5.2.5 Appropriate waste segregation and disposal systems will be incorporated into design to avoid fly-tipping.

5.3 Energy

- 5.3.1 The primary energy supply to the building will be electrical power, which will feed all lighting and small power requirements. The M&E specification will aim to promote energy efficiency in order to reduce running costs whilst maximising internal comfort for building occupiers.
- 5.3.2 Opportunities to implement the energy hierarchy and to improve building insulation will be sought. Consideration will be given to passive design elements where suitable.
- 5.3.3 The mechanical services installed during the construction of the proposed Development will include mechanical ventilation, occupancy based natural ventilation, domestic hot and cold-water services and automatic controls.
- 5.3.4 The installation of mechanical systems shall take due account of all relevant British Standards, The Building Regulations, recommendations of the Chartered Institution of Building Services Engineers (CIBSE) and The Institute of Plumbing.
- 5.3.5 All associated pipework will be sufficiently lagged with insulating material to reduce heat loss.

- 5.3.6 All lighting shall consist of LED fittings and will be controlled via a combination of automatic (daylight and passive infra-red PIR occupancy sensors) and manual controls to minimise energy use. Automatic dimming shall also be provided where necessary.
- 5.3.7 In addition to the above, installed Heating, Ventilation and Air Conditioning (HVAC) will promote the use of refrigerant gases with low global warming potentials, subject to their suitability.
- 5.3.8 Attempts will be made to reduce energy demands to their lowest practicable level in order to support reductions in regulated and unregulated CO₂ emissions.

5.4 Transport

- 5.4.1 The sustainability objective relating to this aim supports the reduction of pollution and congestion levels on roads adjacent to the Site. Active modes of travel will be encouraged along with other methods of sustainable travel, for instance walking, cycling and the uptake of public transport.
- 5.4.2 In accordance with Paragraph 111 of the National Planning Policy Framework (NPPF) a Travel Plan will be produced in order to mitigate the impacts from movement to and from the Site in accordance with the Framework Travel Plan prepared by Vectos.
- 5.4.3 As around 30% of UK energy use is associated with transport, developments of this nature that can encourage a reduction in car use have a positive impact on the environment; both through a reduced reliance on precious fossil fuel resources and a reduction in harmful emissions.
- 5.4.4 The proposed design makes an allowance for electric vehicle charging points. It is understood that 9no. active car charging points will be installed.
- 5.4.5 Where feasible the proposed development will support Local Authority plans through the provision of secure cycle storage and promotion of local networks for public transport.

5.5 Materials

- 5.5.1 The sustainability objective is to reduce the impact of construction on natural resources by using sustainable, legally sourced products.
- 5.5.2 Building materials have a significant impact when the embodied energy and resources used in their manufacture, transport and disposal are considered. Responsible sourcing of materials can have a real beneficial effect on the embodied impact of the final development.
- 5.5.3 All relevant materials in basic and finishing elements will be responsibly and legally sourced from certified suppliers using sustainable raw materials where possible.
- 5.5.4 The responsible sourcing of key construction material will be promoted through certification such as ISO14001 or BES6001. All timber products used in construction will be sustainably certified to FSC or PEFC standards, or equivalent.
- 5.5.5 Wherever possible recycled content within sourced materials will be encouraged and specifications will promote the use of robust materials, which are designed for reuse and with high environmental performance. The use of low carbon concrete will be encouraged where structurally feasible and PFA / GGBS substitutions will be specified.
- 5.5.6 Materials will be sourced from local suppliers wherever possible to reduce transport miles and support the local supply chain.
- 5.5.7 Materials containing chemicals which are harmful to health or the environment will be avoided wherever possible.

5.6 Waste Management

- 5.6.1 The sustainability objective is to reduce waste going to landfill through material efficiency, recycling and sustainable construction methods. Waste mitigation measures for the construction stage are further addressed within a separate Waste Management and Minimisation Statement.
- 5.6.2 A key part of sustainability is to manage resources efficiently. Reducing the amount of waste created and maximising resource efficiency during the building's lifetime is fundamental to providing sustainable developments.

- 5.6.3 In an effort to reduce landfill volumes, the waste hierarchy will be followed to ensure that efforts to reduce construction and operational waste concentrate on the reduction of site waste and promote opportunities for reuse and recycling. This hierarchy ranks waste management options according to what is best for the environment (prevention, preparing for re-use, recycling, other recovery, disposal).
- 5.6.4 Adequate facilities will be provided for the storage and recycling of waste and this in conjunction with the adoption of the Local Authority collection scheme for waste and recycling will encourage occupants to minimise waste going to landfill.

5.7 Land Use and Ecology

- 5.7.1 The sustainability objective is to protect, maintain and enhance existing biodiversity and habitats, and to create new habitats to add value to the landscape in order to improve the urban environment.
- 5.7.2 The Site currently comprises an 'L' shaped building which was formerly used for the manufacturing and distribution of car seats. Two service yards are located in the north and south of the Site respectively, with car parking located in the west and isolated areas of soft landscaping. The Site is located within a mixed commercial / light industrial area which forms the Stakehill Industrial estate.
- 5.7.3 Where feasible, the creation of new habitats will be promoted, adding ecological value for example, roof area for nesting birds.
- 5.7.4 All works on Site should follow an appropriate working methodology to avoid inadvertent damage to any habitats and associated fauna surrounding the Site. All works should be undertaken in accordance with the UK governments 'Pollution Prevention for Businesses' guidance.

5.8 Water

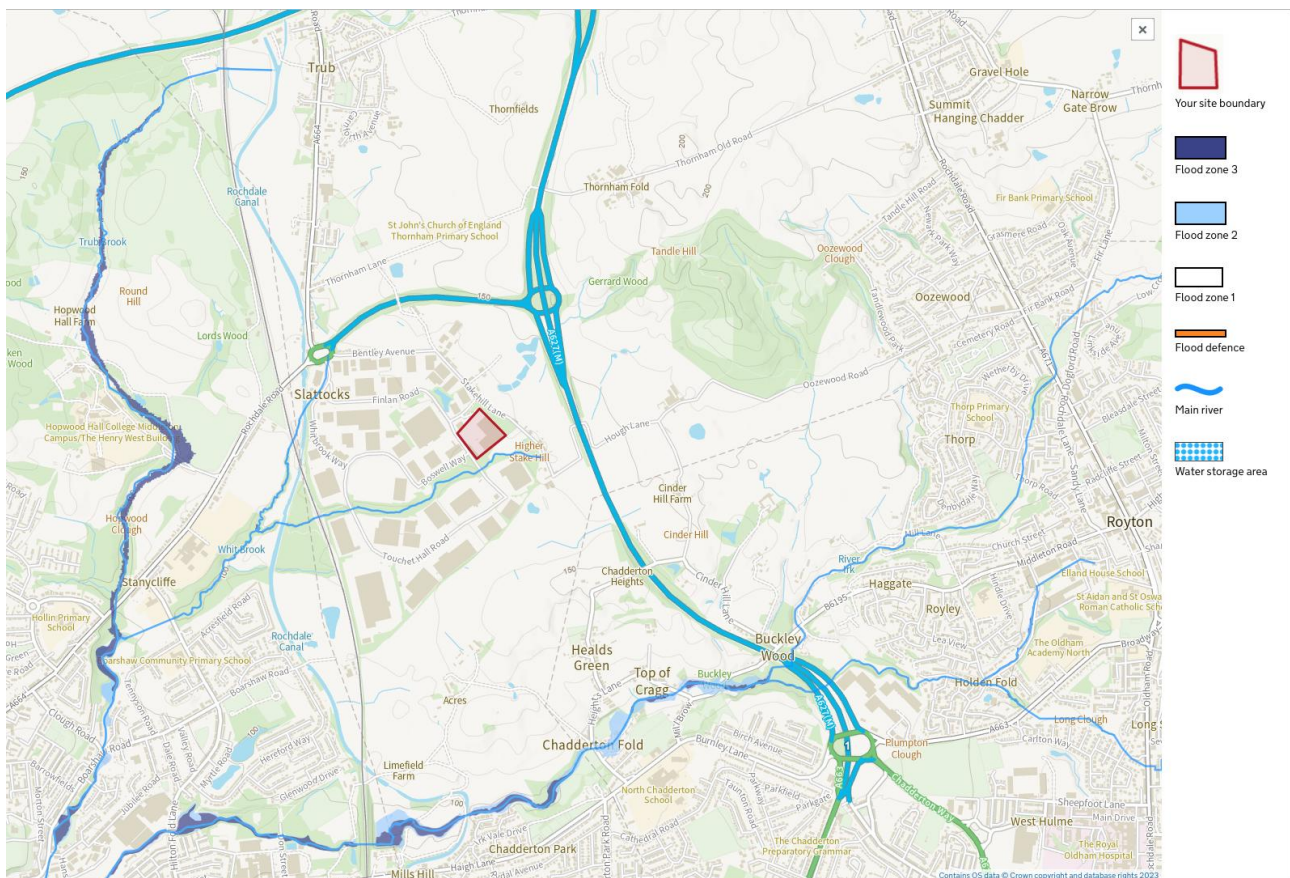
- 5.8.1 Delta-Simons has assessed the potential to retrofit SuDS features into the proposed development which will seek to slow the flow of water from the Site to the wider drainage network and provide betterment over the existing scenario.
- 5.8.2 The following SuDS options have been considered:
- Soakaways;
 - Swales, detention basins and ponds;
 - Rainwater harvesting;
 - Green roofs;
 - Porous/permeable paving; and
 - Underground attenuation tanks.
- 5.8.3 The proposed development will result in an increase in hardstanding areas, increasing the impermeable drainage area and surface water runoff. In order to ensure the increase in surface water runoff will not increase flood risk elsewhere, flow control will be used, and attenuation provided on site to accommodate storm events up to and including the 1 in 30 year plus 30% climate change event.
- 5.8.4 All methods of surface water discharge have been assessed. Where soakaways are not possible, discharge of surface water to Whit Brook, located approximately 10 m south of the site, at a rate of 13.6 l/s appears to be the most practicable option and appears to be feasible via gravity.
- 5.8.5 Water efficiency measures will be encouraged where necessary through the use of low water appliances, flow restrictors and sensors.

5.9 Pollution

- 5.9.1 The sustainability objective is to reduce the environmental impact of atmospheric, watercourse, noise and sound pollution.

- 5.9.2 There are a variety of forms of environmental pollution that can potentially arise from the construction and use of buildings. A significant proportion is airborne in the form of dust, fumes and chemicals. Other forms of pollution include unwanted noise or light.
- 5.9.3 Efforts will be made to ensure the environmental impact of the materials used for the build will be reduced through responsible sourcing and reduced wastage.
- 5.9.4 Best practice guidance for pollution control will be adopted during construction and operational stages in order to protect sensitive receptors. Nuisance caused by light and noise pollution will be prevented, along with the accidental discharge of contaminants into local watercourses.
- 5.9.5 No on-Site burning will be permitted during construction and emissions of dark smoke will be avoided in an effort to prevent air pollution.
- 5.9.6 The UK health Security Agency (ukradon.org) data indicates that the Site lies within a lower probability radon area where less than 1% of homes are estimated to be at or above the recommended action level. No radon protection measures are necessary in the construction of new dwellings or extensions at the site.
- 5.9.7 An examination of the Environment Agency Flood Map suggests that the immediate site presents a very low annual probability (0.1%) of flooding (Flood Zone 1).

Figure 4. Environment Agency Flood Risk Map3efv



6.0 Conclusion

- 6.1.1 This Energy and Sustainability Statement has demonstrated that the Proposed Development at Unit A, Finlan Road, Stakehill Industrial Estate, Middleton (M24 2SJ) aligns with the relevant local, regional, and national planning policies, including Policy JP-S2 of Greater Manchester's Places for Everyone (PfE), the National Planning Policy Framework (NPPF), and Rochdale Borough Council Core Strategy (2016).
- 6.1.2 The Development has been designed in accordance with the energy hierarchy as stated in Policy JP S2, and documented below:
- Be Lean - The building's energy demand has been minimised through efficient fabric performance and high-efficiency M&E systems.
 - Be Clean - Opportunities for energy-efficient supply have been considered, with provision for future decentralised energy connections if viable.
 - Be Green - Renewable energy provision has been integrated through the inclusion of 9 no. 7kW electric vehicle charging points, with capacity for future solar PV installations.
 - Be Seen - The development will allow for monitoring and reporting of energy performance in accordance with best practice.
- 6.1.3 Key sustainability measures include:
- Alignment with Policy JP-S2 by promoting renewable and low-carbon energy solutions, providing EV charging infrastructure, and incorporating measures to enable future heat network connection where feasible.
 - Compliance with Rochdale Core Strategy Policies G1, G2, and G3, demonstrating reductions in CO₂ emissions, adherence to the energy hierarchy, and consideration of climate adaptation measures.
 - Integration with the NPPF, ensuring the development supports sustainable growth, minimises environmental impact, and avoids increasing vulnerability to climate change.
 - Commitment to resource efficiency, including responsible sourcing of materials, waste minimisation, and sustainable drainage (SuDS) solutions to manage surface water.
 - Support for active and sustainable transport, through EV charging provision, cycle storage, and a Travel Plan in line with NPPF Paragraph 111.
- 6.1.4 The BRUKL assessments confirm that the Building Emission Rate (BER) and Building Primary Energy Rate (BPER) are below the Notional building values, demonstrating compliance with Part L2 of the Building Regulations.
- 6.1.5 In addition, the development is located within Flood Zone 1, indicating a very low probability of flooding, and best practice measures will be implemented to manage pollution, noise, and environmental impacts throughout construction and operation.
- 6.1.6 In summary, the Proposed Development meets the requirements of Policy JP-S2 for sustainable energy infrastructure and low-carbon development. Aligns with local and national policy objectives for climate change mitigation, sustainable transport, and environmental protection, and supports Greater Manchester's carbon neutrality and climate resilience goals.
- 6.1.7 Accordingly, the Proposed Development is considered to fully comply with local, regional, and national sustainability and energy planning policies, and it represents a positive contribution to the delivery of a low-carbon, resilient, and sustainable industrial estate.

Appendix A – Data Sources

- BRUKL Output Documents, MES Building Solutions, March 2023;
- M&E Strategy, Crookes Walker Consulting, February 2023;
- National Planning Policy Framework, February 2019;
- Proposed Site Plans and Layout, Sitiescan, January 2023; and
- Rochdale Metropolitan Borough Council Core Strategy, Rochdale Borough Council, 2016.

Appendix B - Limitations

Limitations

The recommendations contained in this Report represent Delta-Simons professional opinions, based upon the information listed in the Report, exercising the duty of care required of an experienced Sustainability Consultant.

Delta-Simons obtained, reviewed and evaluated information in preparing this Report from the Client and others. Delta-Simons conclusions, opinions and recommendations has been determined using this information. Delta-Simons does not warrant the accuracy of the information provided to it and will not be responsible for any opinions which Delta-Simons has expressed, or conclusions which it has reached in reliance upon information which is subsequently proven to be inaccurate.

This Report was prepared by Delta-Simons for the sole and exclusive use of the Client and for the specific purpose for which Delta-Simons was instructed. Nothing contained in this Report shall be construed to give any rights or benefits to anyone other than the Client and Delta-Simons, and all duties and responsibilities undertaken are for the sole and exclusive benefit of the Client and not for the benefit of any other party. In particular, Delta-Simons does not intend, without its written consent, for this Report to be disseminated to anyone other than the Client or to be used or relied upon by anyone other than the Client. Use of the Report by any other person is unauthorised and such use is at the sole risk of the user. Anyone using or relying upon this Report, other than the Client, agrees by virtue of its use to indemnify and hold harmless Delta-Simons from and against all claims, losses and damages (of whatsoever nature and howsoever or whensoever arising), arising out of or resulting from the performance of the work by the Consultant.

Appendix C - BRUKL Reports

BRUKL Reports