



Additional Statement

**Proposed Change of Use of Ground Floor of Vacant Commercial
Building to an Independent Islamic Girls' High School**

Khizra House, Lord Street, Bury

September 2024

1. Introduction

- 1.1 This Additional Statement is submitted on behalf of Watson Saunders Architects in support of a planning application for the change of use of the vacant ground floor of commercial premises at Khizra House to an independent Islamic girls' high school. The proposed school will have a capacity for 120 pupils.
- 1.2 The Statement responds to the email of 19 August from Louise Johnston requesting further information in relation to the following Places for Everyone (PfE) Joint Plan policies:
 - **JP-S2: Carbon and Energy** – Energy statement to set out how the proposal complies with Policy JP-S2.
 - **JP-C2: Digital Connectivity** – All new development to have full fibre to premises connections, unless technical infeasible and/or unviable.
 - **JP-C8: Transport Requirements for New Developments**
- 1.3 Each of these policies is dealt with in turn in the following sections of this Statement.

2. JP-S2: Carbon and Energy

- 2.1 JP-S2 sets out the aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in carbon emissions.
- 2.2 The proposed development involves the re-use of an existing building. The parts of the policy which are relevant to the development are:
- Promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling.
 - An expectation that new development will be net zero carbon with regard to 'regulated' operational carbon emissions (i.e. heating and cooling), unless it can be demonstrated that it is not practicable or financially viable.
 - As an interim measure development should be consistent with the 2022 Part L Building Regulations.
- 2.3 The policy sets out that development proposals should set out the approach to achieving net zero in accordance with the energy hierarchy which seeks, in order of importance, to :
- i) Minimise energy demand;
 - ii) Maximise energy efficiency;
 - iii) Use renewable energy;
 - iv) Use low carbon energy; and
 - v) Utilise other energy sources.
- 2.4 **Comment**
- 2.5 The proposal is for the conversion of an existing building and therefore it is not practicable to build in some of the net zero features that would be expected in a new building. The re-use of a building is in itself a sustainability measure.
- 2.6 The UK Net Zero Carbon Buildings Standard is due to be published in 2024.
www.nzcbuildings.co.uk
- 2.7 According to the web site:
- The UK's first cross- industry Net Zero Carbon Buildings Standard that brings together Net-Zero Carbon requirements for all major building types, based on a 1.5°C trajectory. Leading organisations [BBP](#), [BRE](#), [the Carbon](#)*

[Trust](#), [CIBSE](#), [IStructE](#), [LETI](#), [RIBA](#), [RICS](#), and [UKGBC](#) have joined forces to champion this initiative.

Whilst significant progress has been made in defining what ‘net zero’ means for buildings in the UK, a process of market analysis showed a clear demand for a single, agreed methodology. The UK Net Zero Carbon Buildings Standard will enable industry to robustly prove their built assets are net zero carbon and in line with our nation’s climate targets. The Standard will align as far as possible with existing Net Zero initiatives and Standards,

- 2.8 In the interim, as recommended by Policy JP-S2, the proposed development will be consistent with Part L of the Building Regulations which deals with the conservation of Fuel and Power.
- 2.9 The energy efficiency of the building will be improved by a number of measures which may include improvements to insulation, upgrading of the heating system, new windows and controlling ventilation.
- 2.10 All of these will be the subject of an application to the Local Authority Building Control service under Part L of the Building Regulations (or any updated regulations in place at the time) which will set out relevant U value calculations. The applicants will work pro-actively with the Building Control service to agree sustainable and affordable approaches to energy efficiency.
- 2.11 It is not intended to install any renewable energy generation facilities on the building, at least until the school has become a well established part of the local community, but this will be a future aspiration, subject to practicality of installation of the relevant services and viability.
- 2.12 Where possible and financially viable, the applicants will use an energy provider which obtains its energy from renewable sources.

3. JP-C2: Digital Connectivity

3.1 JP-C2 supports the provision of affordable, high quality, digital infrastructure. In making decisions the Joint Plan authorities will support a range of measures including:

- *Requiring all new development to have full fibre to premises connections, unless technically infeasible and/or unviable, and to incorporate multiple ducting compliant with telecoms standards, to facilitate future-proof gigabit-capable network connections. It is expected that internet connections will be operational and immediately accessible to network providers when occupiers move into new properties.*

3.2 Comment

3.3 The proposal involves the re-use of an existing building and therefore is dependent on the existing network infrastructure. The applicants have no control over whether or when full fibre will be introduced.

3.4 We can confirm that broadband infrastructure is available in the area as the adjacent Mosque is connected to it. Broadband will be available to the School from the first day of its opening. This is expected to use existing ducting but if replacement ducting is required it will be specified with a view to future-proofing where possible.

4. JP-C8: Transport Requirements for New Development

4.1 JP-C8 requires new development to be located and designed to enable walking cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive , liveable and sustainable environments.

4.2 Comment

4.3 These matters have already been addressed in the Transport Assessment and Travel Plan by Amni Transportation which have ben submitted in support of the application.

4.4 The Transport Assessment demonstrates that:

- The school will serve a very local community and a high proportion of pupils are expected to walk to school;
- There are footways along the roads surrounding the site and a system of street lighting. There are traffic controlled pedestrian crossing facilities, pedestrian refuge islands, guard rail and dropped crossings to help aid crossing Rochdale Road and Heywood Street, the roads connecting the site to the local residential areas and bus stops. The local residential areas have low traffic speeds;
- The site is in a location that exhibits high levels of transport accessibility according to the GM Mapping Tool;
- The site is served by public transport with Bury Bus and Tram Interchange close by and bus stops located on the roads close to the site;
- With the low traffic speeds in the local residential areas, shared cycle and pedestrian paths and the cycle parking at the site, cycling is a realistic option of travel to the proposed school;
- The scheme proposes 12 car parking spaces including 2 mobility spaces, which complies with the Council's SPD on car parking. The scheme includes a covered cycle shelter.
- The site is in a highly sustainable location. If parents choose to drop off and pick up there is unrestricted parking along sections of Parker Street and Mason Street and limited waiting parking bays on Mason Street to accommodate this.

4.5 The Travel Plan includes the following:

- The TP describes the existing sustainable transport infrastructure and services that are available to reduce the number of private car trips that are generated by the education development, especially single occupancy car trips. Information will also be provided to staff, students and parents to support and encourage them to travel to the site by means other than by single occupancy vehicles.

- The TP includes measures and initiatives to encourage staff, students and parents to travel by means other than the private car. Travel surveys will be carried out and monitoring carried out every year and monitored over a 5-year period after occupation of the school. It is hoped the strategies, events and understanding of the importance of sustainable travel will be positively received by the staff, students and parents and monitoring will continue beyond the five-year period and continuing improvement strived for.
- The TP aims to reduce the number of single occupancy private vehicle trips and the number of weekday peak hour vehicle trips for the benefit of the local community, other road users, the safety and health and well-being of students and the environment.
- The TP will also aim to reduce the demand for parking in the area and minimise the number of vehicles that use the road network. The TP will aim to encourage more trips to be made by sustainable transport and this will be beneficial for staff, students, parents and the community in terms of their health and well-being.