Dear Charmian

Thank you for highlighting the above development. I have read the submitted Energy Statement (mandatory under the Adopted Core Strategy) and come to the following conclusions.

The document refers extensively to the Core Strategy but fails to acknowledge the key benchmark of a minimum standard of Code for Sustainable Homes Level 4 and BREEAM Very Good for all non residential developments. This has been adopted and approved by the Planning Inspector.

The Deregulation Bill has not removed the ability of Local Authorities to set energy efficiency levels – this will only come into place when the Zero Carbon Strategy has been nationally adopted.

The development submits a Predicted Energy Demand of 7.3 GWh of electricity and 15 GWh of heat. It proposes the reduction of emissions by solar panels and/or a variety of heat pumps. It rejects any attempt at district heating or cooling purely on the grounds of estimated capital costs. No figures are suggested for other renewables and none are submitted for the capital costs of installing a conventional heating system. The Fabric Energy Efficiency of the development is not considered although the tables submitted suggest a fairly mediocre space heating retention at 13223000/222,000 or approx 60 kWh/m²). Zero Carbon Hub figures are for 39-46 KWh/m².

While the Energy Statement is well argued and presented by a reputable firm it appears to dilute the commitment to energy efficiency and to cite outdated benchmarks. The Methodology is suspect in appendix C. The development has to satisfy Part L 2013 as a minimum so citing reductions over 2010 Part L is not relevant.

It is also noted that the consultants themselves acknowledge the sketch nature of the scheme in their assumptions and limitations (Appendix C para 9) : “It is recommended that a more detailed energy demand modelling is undertaken for the development once more detailed designs are available”.

In summary the scheme should be rejected until the Energy Strategy is revised and the Code 4 commitment is adopted or conditioned.

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