

From: Maria Tomalova <Maria.Tomalova@arun.gov.uk>
Sent: 21 October 2020 18:05
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: AL/70/20/PL - Norton Lane

Please upload the below to the above application. Letter of representation

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From: Andrew Juniper - WABI SABI [REDACTED]
Sent: 21 October 2020 16:33
To: Maria Tomalova <Maria.Tomalova@arun.gov.uk>
Subject: Fwd: AL/70/20/PL - Norton Lane

Dear Ms Tomalova ,

This is a letter regarding the proposed development of a 6 residence mews in Old Dairy Lane, Norton - AL/70/20/PL and our objection to it.

The reason for this letter is to draw attention to the seeming inaccuracies in the Environmental Design Statement and the implications this would have for the application's claimed sustainability.

These are as follows:

1. The application claims that the proposed heating system of LPG (Liquid Petroleum Gas) would lead to lower carbon emissions than an electric heat pump system.

The information available on this matter can be found by checking the latest data provided by DEFRA (Department for Food and Rural Affairs) on the Carbon Grid Factor which states that the CO₂ emissions per KWh on the National grid now stands at 136gCO₂/kWh with predictions that this will fall to 41gCO₂/kWh within 15 years. LPG has a rate 58% higher than this at 215gCO₂/kWh. Add to this that heat source pumps can produce 4 times more energy than they consume by taking free and clean energy from the heat in the air/ground and this means that even at today's national grid rates an LPG system will emit at least 5-7 times more carbon than a well installed ground source heat pump with that figure set to rise to more than 15-20 times the carbon emissions by 2035 as the National Grid moves rapidly towards decarbonisation. The Council for Climate Change are suggesting all gas boilers should be banned from new builds because they are viewed as unsustainable. Even with good insulation the proposed set of six households run on LPG combined with all of the extra car travel associated with living in a rural village without local shops or regular public transport would create a very much higher level of carbon emissions than could be reasonably considered sustainable. The LPG will also need to be regularly tanker delivered from a distant depot through Norton and down Old Dairy Lane and stored and it is not clear from the block plan where gas would be stored.

2. There is a section which states that the houses may benefit from PV panels but these are not shown in the designs and none of the roofs are south facing. The local electricity supplier (DNO) may also limit the amount of solar power added to the grid as Norton is right on the limits of what extra solar it can take. A recent 36 panel 10KW installation in a neighbouring property (AL/104/18/HH) was limited to just 7KW output because of the higher peak voltages in the Norton area. To make any meaningful contribution to the reduction of carbon emissions for 6 properties a pretty large PV installation would be required.

3. The application states that the residents may be able to benefit from Renewed Heat Incentive (RHI) payments but it is not at all clear where these would come from if the heating system is based on the proposed LPG heating. The Government currently only offers RHI payments on Solar water heaters, Biomass boilers and air/ground source heat pumps. The very vague idea that the residents might get an RHI from the token 10% of some undefined decentralised renewable energy seems to stretch credulity.

The overwhelming consensus of climate scientists is that we need to take urgent action now to reduce our carbon footprints so the importance of building sustainable properties cannot be overstated. There is a huge responsibility and indeed opportunity for the current generation of architects, developers and Planning authorities to try to mitigate the damage we cause. Could a new build running on LPG sited in a rural area where there will inevitably be a high reliance on vehicles really be considered a sustainable development when we are now perfectly capable of designing and building affordable carbon neutral houses? Surely as an affluent area in a G7 country we can aspire to more than that.

Yours Sincerely

Andrew Juniper
Long Barn
Norton Lane

