

Simon Davis

From: Simon Davis
Sent: 04 September 2013 15:21
To: 'richard lowe'
Cc: Charlotte Hardy
Subject: RE: BR/201/13/DOC - 3 Marine Drive West, Bognor Regis

Dear Richard,

Please ask OG Energy Ltd not to contact Joanna direct as she was somewhat doing me a favour by providing comments hence I said please respond to me. However, I have also now had comments from our Policy team, as provided below in italics. OG Energy can instead respond to Charlotte Hardy or [REDACTED] or by email: [REDACTED]

"Looking over the details in the Energy Statement and also the details of the system spec I am afraid that I still have some issues at the moment that make it hard for me to be able to agree to Condition 6 being discharged.

In terms of policy I am presuming that the application of the condition was more in line with emerging policy although it does have grounding in the 2003 Local Plan as well. In terms of the current Local Plan it of course needs to comply with policies GEN21 and to some extent GEN24. In terms of GEN21 it is really the last criteria that is the issue in terms of 'development will make a contribution to meeting need on a local, regional or national basis and the reduction in emissions of damaging greenhouse gases'. It is also within the supporting text of this policy that the 10% figure is mentioned. At the moment on the basis of the information provided, I am unable to get the figures that they have within their Energy Statement and so could not confirm that this is going to be the case, especially considering the fact that there can be a number of factors which potentially may mean these technologies can result in greater amounts of energy being used (which consequently creates more greenhouse gases). In terms of GEN24 slightly more is fine. It would more than likely meet the requirement of point (i), although it is harder on the information provided to be able to comment on whether it meets point (ii) of the policy.

In terms of emerging policy we do state at the end of SP18 that 'In assessing the achievement of these standards the Council will consider: A. Site constraints; B. technical viability; C. Financial viability and D. Delivery of additional benefits.' In terms of these requirements we are not sure about the technical viability and so at the moment it would not comply.

Overall I have issues in terms of the figures that they have within the Energy Statement in that I am unable to come out with the same figures. Also when looking at both the energy statement and the Kingspan leaflet about the intended systems I get confused with the information, or lack of it, that has been provided. In the Energy Statement they discuss solar hot water systems but state in the recommendation that it would be impractical in terms of the pipework to the lower levels and in terms of only providing 6% of the site energy requirement. In terms of Solar PV they leave the recommendation completely open ended. Logically from what they are saying it would seem that the amount of space means that it would not be possible, however they do not actually state that this is the case. As mentioned at the beginning in comparing what they then say about the air source heat pumps and what is in the information leaflet and the figures provided I am unable to confirm their recommendation. Furthermore when comparing the two, it would seem that the use of the gas boiler means they must be going down the route of a Bivalent and Integrated System. Again however they have not explained the situation in their Energy Statement and on the figures within it I am not able to confirm their recommendation as I am unable to get the same figures.

I would suggest that further clarification needs to be added into the Energy Statement and that the figures need to be sorted. As Jo has suggested, having the coefficients and/or ratios expected would be the most helpful thing in this respect.

On a more personal note I feel that the option of solar water heating or PVs have discounted too easily. I feel that something potentially combining the two may create more guaranteed savings. Potentially this may be done through them being applied to only the number that are feasible (such as the top 2 flats specifically or 2/3 floors)."

Kind Regards

Simon J Davis MRTPI, Senior Planning Officer, Development Control
Arun District Council (First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF)

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P Save the environment - think before you print.

From: richard lowe [REDACTED]
Sent: 04 September 2013 09:54
To: Simon Davis
Subject: RE: BR/201/13/DOC - 3 Marine Drive West, Bognor Regis

Dear Simon,
Thank you for forwarding Joanna's comments on the Energy Statement,
I have passed these on to the developer with the request that OG Energy Ltd deal directly with her. I would prefer not to act as a 'go-between' and imagine that you do not either. As long as we are kept in the loop.
I am arranging for a sample of the Cedral weatherboarding to be submitted together with a CGI image which, I trust, illustrates what goes where (although I believe this was submitted in support of the appeal and you may already have a copy of it).

Regards,
Richard Lowe
[REDACTED]

From: Simon Davis [mailto:Simon.Davis@arun.gov.uk]
Sent: 02 September 2013 14:24
To: richard lowe
Subject: FW: BR/201/13/DOC - 3 Marine Drive West, Bognor Regis

Dear Richard,

Please see comments below as discussed. My colleague is referring to the tables in the Energy Statement. She also printed off a brochure for the Kingspan Aeromax Plus and refers to that.

Please respond to me.

Kind Regards

Simon J Davis MRTPI, Senior Planning Officer, Development Control
Arun District Council (First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF)

[REDACTED]
www.arun.gov.uk

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From: Joanna Allatt
Sent: 29 August 2013 15:16
To: Simon Davis
Subject: RE: BR/201/13/DOC - 3 Marine Drive West, Bognor Regis

Dear Simon,

As discussed briefly I have concerns about whether this application can realistically deliver over 10% on site renewable energy based on the information provided in the application. First of all, there appears to be a typo in the table specifying the type of heating system proposed to be installed in the flats which are meant to be getting air source heat pumps (ASHP); it indicates that gas central heating and radiators will be installed but on the previous

table suggests the heat pump (I don't imagine they are having both and if they are then what's to say that the ASHP would even be used?!).

I have looked at the specification for the ASHP which they have proposed might be used (Kingspan Aeromax plus) and I am confused as to whether the energy calculation has taken into account the electricity that will be required to operate the ASHP as part of the calculations (as it is not clear in the report). If they are planning to install a radiant system in those two flats (which requires 55-70 degrees heat input) rather than a underfloor heating system (which would operate on a much lower input temperature of around 35 degrees), then the coefficient provided by Kingspan on the expected efficiency of the systems for these flats is significantly lower at just over 2:1 rather than the optimum rating of 3:1-4:1. This would mean the end user would only get 2 units of renewable heat out for every 1 unit of electric put in rather than 3 or 4.

To make a real comment on this I think we would need to know what coefficient the developers were working to when specifying these ASHPs to see how realistic they are actually being and because of the typo, we would need clarification on what type of heating system will be installed in those two flats as mentioned above.

Hope that is helpful and makes sense,

Regards

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