

Charlotte Burrows

From: Simon Davis
Sent: 04 September 2013 15:02
To: Planning.Responses
Subject: FW: BR/201/13/DOC - 3 Marine Drive West, Bognor Regis

Please upload to the website.

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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From: Charlotte Hardy
Sent: 03 September 2013 11:40
To: Simon Davis
Cc: Joanna Allatt
Subject: RE: BR/201/13/DOC - 3 Marine Drive West, Bognor Regis

Hi Simon

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).

Hope this helps

Charlie

From: Simon Davis
Sent: 29 August 2013 14:19
To: Charlotte Hardy
Subject: FW: BR/201/13/DOC - 3 Marine Drive West, Bognor Regis

Charlie,

I sent the below to Joanna and when she came to see me earlier, she suggested that you might be an appropriate person to provide a response. So I wonder if you could take a look at the docs and provide a view.

Thanks

Kind Regards

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From: Simon Davis
Sent: 29 August 2013 12:25
To: Joanna Allatt
Subject: BR/201/13/DOC - 3 Marine Drive West, Bognor Regis

Dear Joanna,

I'm dealing with a condition discharge concerning the need for 10% of the development to from decentralised/renewable energy/low carbon sources. I've spoken to Dan Vick and he suggested I might try liaising with yourself and also Building Control regarding checking the details received which include an Energy Statement and an EPC/SAP Worksheets (available on the website for BR/201/13/DOC). I wonder if you can help with this?

The planning condition in question (06) states:

"At least 10% of the energy supply of the development shall be secured from decentralised and renewable or low carbon energy sources (as defined in the Glossary of the National Planning Policy Framework). Details and a timetable of how this is to be achieved, including details of physical works on site, shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development. The approved details shall be implemented in accordance with the approved timetable and retained as operational thereafter, unless otherwise agreed in writing by the Local Planning Authority."

Are you able to help at all?

Cheers

Kind Regards

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