



Energy Alton and Alton Climate Action and Network (ACAN) respond to the East Hampshire's Draft Climate Change and Sustainable Construction SPD – January 2022

General

Energy Alton and ACAN welcome the effort EHDC has put into this document and asks the Council to treat the following comments as constructive criticism. Our comments tend to be centred on section 4 Implementation, as this is the crucial section as far as the built environment is concerned.

We have seen and endorse the submission from Petersfield Climate Action Network (PeCAN) our partner environmental organisation in East Hampshire. In particular we strongly endorse the recommendations regarding incentives.

We find the section 2.15 'What is Climate Change' breathtakingly dry and omits any statement of the need for urgent and community wide action. The consequences of failure to deal with the impact of the climate emergency will be catastrophic for all communities including East Hampshire and this should be the clear context for this SPD. Readers need to understand that if the measures in the SPD are fully implemented, we will be on the path to avoiding the worst of the climate scenarios. The document must also make plain the determination of Councillors, the Planning Department and key community groups to rigorously use the planning system make the changes that are absolutely essential. The SPD fails to lead on this critical point.

The SPD is comprehensive and by definition very general. It could apply to any local authority anywhere in the country except for the references to Joint Core Strategy for Whitehill and Bordon. However, this SPD only applies to the part of East Hampshire outside of the South Downs National Park and in particular to Bordon and Whitehill. Alton and the A31 settlements. We would like to see more direct references to this part of East Hampshire especially with regard to water resources, green infrastructure, transport and sustainable development.

We believe it is essential that there is a stronger strategy for sustainable renewable energy developments in north east Hampshire based on the specific energy map of the area and realistic opportunities that could be exploited.

Specific Comments

Section 4.5 states that 'integrating sustainability considerations early in the development process can go some way to ensure that policy requirements can be achieved in a cost-effective manner'. We suggest that this is slightly re-worded to read: 'it is essential that integrating sustainability considerations early in the development process is considered if these policy requirements are to be achieved in a cost-effective manner'.

Sections 4.6 to 4.10 refers to the ability of LPAs to set energy standards for new homes over the existing requirements up to the equivalent of level 4 of the Code for Sustainable Homes. Putting this in the report is totally superfluous because level 4 of the Code sets a level of performance 25% above the 2010 edition of Part L of the Building Regulations and this is already going to be exceeded by the 30% improvement set out in the 2022 edition. The 2022 edition is due to come into force within three or four months.

Section 4.17 Under the section 'Submission Requirements' it states the 'adequate information to show how the energy and carbon requirements have been met in the form of design stage SAP assessments and a schedule of low or zero carbon energy'. This should be amended as follows 'adequate information to show how the energy and carbon requirements have been met in the form of design stage SAP assessments or other approved calculations from building physics modelling software programs such as Passivhaus' to take account of the fact that SAP calculations become less and less accurate as properties tend towards the 'Passivhaus' standards that are required to reach a true zero carbon solution.

Section 4.33 – The statement 'removal of mature trees will need to be factored into the Carbon Reduction calculation' needs further expansion to be meaningful.

Section 4.39-Materials. There is no mention in the SPD of the Circular Economy which is now a prominent issue nationally and its omission is a failing. The statement under section 4.39 that 'the use of low carbon and well managed materials is expected in all developments' is just not specific enough. The embedded carbon and re-cyclability of building materials is becoming a major issue and organisations such as LETI and the RIBA are developing specific approaches and programs to calculate its effects. This section of the guidance needs expanding to explain what is meant by the above statement.

Section 6 Renewable low-carbon local power and heating.

This very detailed but broad section on renewable energy never gets to the point. It should specify the current energy demand for our communities, how much of that is from renewable sources and what is in the pipeline. It could calculate how much change of land use and growth of renewable technologies are required to meet our 2050 targets and the staged growth needed by say 2030.

EHDC knows the limitations for the use of wind power and hydro in East Hampshire. It also knows the potential for solar, heat pumps and energy from waste (food and plant-based).

The SPD could be much more enabling by setting the scene, proposing sustainable developments that would be welcomed and again providing incentives to encourage such applications.

Enforcement of this SPD

Naturally as groups lobbying to achieve zero carbon energy, we feel the aspirations of the report don't go far enough but we realise the limitations of how far local government can go at present in promoting this aim. However, since much that is within the document is unenforceable at present, we feel that the document should be more definite in giving incentives to ensure that applicants for planning consent follow this guidance similar to the following:

Statements such as:

'Applications where there are clear environmental aspirations and benefits will automatically be fast-tracked through the Planning at compared to those where the environmental aspirations have to be clarified.'

'Applications that go beyond the current requirements would be more likely to be treated with a positive attitude and swifter approval on the part of the planners than applications which lack environmental ambition.' As proposed by PeCAN schemes that exceed the minimum requirements and offer low carbon solutions such as heat pumps could pay less in CIL contributions

Finally: Whilst we could query the wording of some of your definitions of words in the 'glossary' we must correct you when they are clearly wrong as is the case of the definition of Passivhaus.

You state that a Passivhaus 'is a building in which thermal comfort can be achieved solely by post-heating or post-cooling the fresh air flow required for a good indoor air quality, without the need for additional recirculation of air'. Whilst most Passivhaus design incorporates MVHR (Mechanical Ventilation with Heat Recovery) this is not the essence of Passivhaus, indeed it is occasionally not the case. The true definition of a Passivhaus is 'a building that complies with the requirements of the Passivhaus Institute in Germany. To gain Passivhaus accreditation the building must have a heat loss of no more than 15KW_hs per annum per square metre of surface area calculated using their sophisticated thermal modelling program.

Jointly submitted by Energy Alton and ACAN
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