



The Planning Officer
Waverley Borough Council
BY EMAIL

16 October 2024

Dear Sir

17 Bell Road (WA/2024/01914) - Objection

Executive Summary

We object to the proposed application in its current form on the twofold grounds that the application is incomplete, and that there are a number of significant inconsistencies in the material that has been presented. Specifically, the applicant has not provided a compliant Energy Strategy and Overheating report. This does not meet the requirements set out in:

- The NPPF policy 14. Meeting the challenge of climate change, flooding and coastal change.
- Waverley Borough Local Plan Part 1, Policy CC1, CC2 and CC3
- Waverley Borough Local Plan Part 2, DM2
- Waverley Borough Council Climate Change and Sustainability SPD

Our objection is based on a comprehensive review of the application against the policies stated above and the current building regulations. The documents submitted as part of the planning application have been consulted. This note has been prepared by a professional with the relevant experience as an accredited Building Physics Engineer, M.Eng, C.Eng. MCIBSE, OCDEA, NDEA L5.

The Energy Hierarchy provided is poor, lacks detail and evidence as required by Waverley's planning policies. This document is very important as it will set out the building fabric, services and plant space requirements which the applicant would need to design to up to completion. The Energy Strategy goes beyond building regulations in setting the applicants commitments to mitigate its carbon impact in today's climate emergency.

The Overheating Strategy is also a fundamental document as it will inform the building's façade, ventilation and opening strategy which needs to be fixed at planning stage. It also ensures that buildings can cope in future climate change scenarios without impacting the occupant's health or the requirement for cooling which would further contribute to the building's carbon emissions.

Commentary on the information provided.

1. The energy report provided is weak, lacks detail and doesn't go through the Energy Hierarchy as **required by Waverley Borough Local Plan Part 2, DM2**. The Energy Hierarchy should show that the houses comply with the SAP 10 targets through Be Lean measures (**Step 1 and 2 of the Energy Hierarchy**) alone before the use of low carbon or renewable technologies. The point of this step is to make sure the proposed building is inherently energy efficient and to prevent green wash.
2. Paragraph 1.0 states that SAP calculations have been provided, but this is not the case; a building compliance report has been provided but no SAP calculations. These are fundamental to verify the inputs used in the assessment and whether the calculations are correct.
3. **Policy CC1, CC2 and CC3 of Waverley Borough Council Climate Change and Sustainability SPD** requires the proposals to demonstrate how the following measures have been considered and implemented:
 - **Energy efficiency measures**
 - **Design Layout Landscape and orientation**
 - **Overheating**
 - **Fabric first measures**
 - a. The Climate Change and Sustainability SPD states (page 10): "Applicants must demonstrate how the energy hierarchy has been considered within the planning application to minimise carbon emissions across the development (orientation, fabric, passive building design, energy efficiency, renewable energy generation). **If certain measures are not viable for a development applicants must provide evidence to show that all possible measures have been considered and why certain measures in this SDP are not viable**". Much of this information is missing.
 - b. **No information has been provided as to the glazing g-Values**. This information is essential in determining how the glazing will absorb and transmit solar gains to the rooms. It needs to be carefully balanced to optimise heat gain but also to prevent the risk of overheating. Too often a high g-value is used in SAP calculations as it reduces the heating demand (by increasing the solar gains); down the line this leads to overheating in the summer months.
 - c. Despite what is claimed in the climate change and sustainability check list **no details have been provided as to the use of mechanical ventilation with heat recovery**. Paragraph 2.1 of the supplied "Energy Strategy" states that mechanical ventilation with heat recovery (MVHR) will be used. The Building Regulation Report supplied as part of the application does not include any MVHR. MVHR is a very useful technology to reduce a Dwelling's heating demand whilst providing adequate fresh air which is important in today's airtight buildings.

- d. **In the same paragraph it says underfloor heating will be used, but the building compliance report says that the emitters are radiators.** Emitters will change the dwelling's Carbon Emissions so this difference is important.
 - e. The report goes on to propose Photovoltaics. **The Photovoltaics (PV) are not shown on any roof plans** making it impossible to assess whether the roof area has been optimised for their use. **There is no information on the PV array size, orientation, kWp or kWh. Furthermore, these do not appear in the building compliance report.** PV is suitable for this scheme and should be incorporated as much as possible to reduce the occupants' reliance on the grid and reduce its energy bills. The report must state (as per the SDP) why other renewable technologies have been discounted.
4. The climate change and sustainability checklist asks for development to consider grey water recycling. **The applicant has stated N/A here, which is incorrect** as they should consider it, and if it is not included they need to demonstrate why.
 5. As above for Circular economy, the applicant doesn't explain how this will be considered and applied for the development.

We should note that we do not, in principle, object to the erection of a dwelling on this site, nor, at this point, do we wish to raise any other concerns. But, as Waverley's own requirements make clear, ensuring that new buildings are energy-efficient and fit for the future is an important matter. Taken together, the omissions and inconsistencies in this application make it impossible to conclude that it is compliant with WBC's requirements, and this application should be rejected until this can be rectified.

Yours Sincerely

S. Dullaway (by email)
(on behalf of The Haslemere Society Planning Group)