



The Planning Officer
Waverley Borough Council
Planning Committee
BY EMAIL

25 September 2024

Dear Sir

Hatherleigh, Tower Road, Hindhead (WA/2020/01673) - Objection

The Haslemere Society wishes to object to this application in its current form on the grounds that the application does not include a compliant Energy Strategy and Overheating report. **The application is deficient both because significant required information has not been provided and because, on the basis of the information that has been provided, the proposed development does not meet the required standards.** As it stands, the application 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 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 and lacks detail. 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 is fundamental in setting the applicant's commitments to mitigate its carbon impact. 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 ensures that buildings can cope in future climate change scenarios without impacting the occupants 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 does not 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 prevent green-wash.

2. There is also a contradiction with the Air Permeability targeted, with the text stating $3\text{m}^3/\text{m}^2.\text{hr}$ but the Be Lean thermal properties table stating $5\text{m}^3/\text{m}^2.\text{hr}$. There is no detail on how the thermal bridging will be assessed. This is a central element of the fabric first approach as it prevents cold bridges in the building fabric.
3. 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.
4. **The SAP calculations showing the carbon emissions achieved through the Be Lean have also not been supplied.**
5. **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

In fact, the application does not satisfactorily demonstrate any of these.

- a. Despite what is claimed in the climate change and sustainability check list, no details have been provided as to the use of efficient lighting and mechanical ventilation with heat recovery.
- b. The report does not state how the dwellings' orientations were optimized for solar gains in the winter whilst providing sufficient shading and ventilation in the summer months (as per the Part O requirements, Chapter 3 of the Climate Change and Sustainability Supplementary Planning document).
- c. The report goes on to state that Air Source Heat pumps will be provided, but gives no information as to their efficiency and how they will be controlled. These are crucial elements in determining whether they will be appropriate and used efficiently.
- d. The report goes on to propose Photovoltaics but then on the same page discounts them but then again proposes them in its conclusion. The Photovoltaics are not shown on any roof plans making it impossible to assess whether the roof area has been optimised for their use.

6. The report only provides the BER (kgCO₂/m²/year) (should be called DER) but does not provide any of the TER figures as required by **Waverley Borough Local Plan Part 2, DM2** making it impossible to assess whether the proposals meet the carbon reduction targets.
7. **The SAP calculations worksheets for the final stage of the Energy Hierarchy including for the Photovoltaics and the Air Source Heat Pumps could also not be found in the application. These are required to verify the applications DERs and TERs.**

Additional information required

The applicant has failed to submit a robust Energy Strategy and Overheating Strategy Report to satisfy the local, regional and national policies. The following information is missing and must be supplied to meet the requirement for a complete application:

- SAP 10 Calculations for each stage of the Energy Hierarchy.
- Carbon Emissions Summary Tables for each stage of the Energy Hierarchy presenting the area weighted averaged carbon emissions against the TER.
- Design Layout Landscape and orientation study.
- Details of the Energy efficiency measures such as efficient lighting and mechanical ventilation with heat recovery.
- Area weighted averaged DFEE/TFEE and DPER/TPER to show compliance with current building regulations.
- Building fabric performance (g-Values), Air Permeability and Thermal Bridging details to show compliance with the first stage of the Energy Hierarchy.
- Renewable feasibility study showing how Air Source Heat Pump and PV will be incorporated
- Building Services strategy, performance, plant space and risers' requirements
- An Overheating report would need to be submitted as per policy CC1 Climate change.

We therefore object to this application on the twofold grounds that it is materially incomplete and that, on the basis of some of the information that has been provided, the proposed development does not meet the required standards.

Yours Sincerely



Sonja Dullaway
(on behalf of The Haslemere Society Planning Group)