**From:** Farthing, Amy
**Sent:** 01 September 2015 12:18
**To:** McClue, Jonathan
**Subject:** FW: Consultee letter for PlanningApplication Application: 2015/4041/P_Hilgrove_revised comments

Hi Jonathan,

See comments on energy relating to the proposals at the Hilgrove Estate below:

General comments
From an energy perspective, the installation of external wall insulation is supported.
Insulating any solid wall reduce heat loss. Depending on layout, the wall is typically the thermal element through which most heat is lost, and therefore improving insulation typically has a significant impact on heat loss, heating demand, and associated fuel bills.

Careful attention should be paid in the design of the external wall insulation system to avoid creation of thermal bridges/ cold spots (e.g. around window reveals, pipework, balconies and any other protruding features) as this can lead to condensation and mould growth internally.
This information could be sought by condition in the form of a method statement.

Due consideration to ventilation and breathability of the building should be given to maintain internal air quality. The insulation will improve the air tightness of the building, and additional work may be required to maintain an appropriate level of ventilation.
This information could be sought by condition, again this could be provided in the form of a method statement

Preventing the ingress of moisture into or behind the insulation is important to maintain the thermal (and visual) integrity of the installation. As such methods for sealing around joints to prevent moisture ingress are important.
This information could be sought by condition in the form of a method statement and detailing.

The applicant will need to comply with relevant requirements of Building regulations Part F (Ventilation) and Part L (Conservation of fuel and power).

Public Benefit
The application demonstrates the following projected benefits of installing external wall insulation at the Hilgrove Estate:

All tenures and properties:
- o Per dwelling average CO2 saving - 1.09 tCO2 (27%) per year, lifetime total (over 36 years) 39.3 tCO2.
- o Whole project estimated CO2 saving - 156.3 tCO2 per year, lifetime total (over 36 years) 5,625.4 tCO2.
- o Average heating cost saving after EWI estimated at £240 per year (29%).
- o Risk of incidence of fuel poverty reduced from 12% of dwellings to 5%.

Council tenanted properties only:
- o Per dwelling average CO2 saving - 0.87 tCO2 (25.5%) per year, lifetime total (over 36 years) of 31.3 tCO2
  Average heating cost saving after EWI estimated at £191 per year (27%).
- o Risk of incidence of fuel poverty reduced from 10% of dwellings to 4%

In addition to these benefits, the improved thermal comfort and reduced heating costs will lead to a reduction in the risk of cold related ill-health, and to improved social and economic outcomes for vulnerable residents.

**CO2 and fuel bill savings:** The calculation of the projected CO2 savings is based on modelling of the specific blocks using interim data and more accurate data may be available.

*Action for applicant: If more accurate figures can be made available using updated data, and the relevant in-use factor, the applicant should supply these as part of the planning application so these can be taken into consideration in assessing the public benefit associated with the scheme.*

When considering the public benefit that will result from the measures, it's important to take into consideration projected rises in energy price. The figures provided suggest fuel bill savings based on the current price for energy, however savings would increase in the future if energy prices also increase.

**Fuel Poverty:** Because fuel poverty is dependant, in part, on income, it is not possible to pinpoint which dwellings are at risk/in fuel poverty. In addition to this, residents are likely to change over the years, so trying to pin point specific dwellings in fuel poverty as part of the planning application is not appropriate. The assessment method used by the applicant for assessing the risk of incidence of fuel poverty is considered appropriate.

**Appropriateness of proposed measures:** When evaluating public benefit of the proposed energy efficiency measures, it's important to understand whether there are any other measures that would be appropriate for the proposed dwellings and the comparative impact these could have on fuel poverty.
*Action for applicant: Please provide detail of other energy efficiency measures considered (including boiler replacement, solar PV, and internal insulation) and clarification of how these would compare in terms of both cost an appropriateness, and whether any of these could bring a comparable reduction in fuel poverty, CO2 and fuel bill savings.*

Local Plan policy
I'd also draw your attention to our draft local plan policy 'D2 Heritage' supporting text, which I understand holds some weight even in draft format.

> ***Sustainable design and retrofitting***
> *7.40 Historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving – preserving their special interest and ensuring their long-term survival. In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed up against the degree to which proposals will change the appearance of the building, taking into consideration the scale of harm to appearance and the significance of the building. Applicants are encouraged to follow the detailed advice in Camden's Retrofitting Planning Guidance, the energy efficiency planning guidance for conservation areas, and the English Heritage website.*

Kind regards

Amy Farthing
Sustainability Officer