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Planning Department
Adur District Council
The Shoreham Centre,
2 Pond Road,
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BN43 5WU

12 December 2022
Ref: SL/Let/P1976

Dear Sir / Madam

RE: Section 73 Application: Proposed Removal of Condition 33 and variation of S.106 to omit references to the District Heat Network, to the development permitted under ref: AWDM/0511/21; (Application to vary Condition 1 of previously approved AWDM/0204/20. Amendments to approved plans including reduction of building heights and raising of basement to mitigate risk of flooding, provision of steps from podium gardens to riverside walk, alterations to windows detailing, alterations to basement car parking layout and alterations to internal building cores to meet fire strategy compliance. Mixed-use redevelopment comprised of three blocks of residential dwellings (4 to 8 storeys) and mixed-use business centre (office, storage and cafe uses) - incorporating riverside walk, landscaping and ancillary car and cycle parking.

Kingston Wharf, Brighton Road, Shoreham-By-Sea, West Sussex.

The application has been submitted to Adur District Council via the Planning Portal under **PP-11762698** and includes the following documents which have been submitted in support of this application.

- Application Form

- Covering Letter

- SRE Energy Strategy, including Financial Analysis 20221207

Condition 33- Sustainability- Heating Network

With the exception of Enabling Works, no other phase of development shall take, unless otherwise agreed in writing, until the following details have been submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the details thereby approved:

i. Details which identify the supply of all space heating and hot water in the buildings by a centralised, communal wet system,

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ii. *Details which identify and safeguard plant room space for the future installation of heat interface equipment, and/or other plant, required for future connection to a future heat network,*

iii. *Details of a safeguarded pipe run into, though, and out of the site to connect the plant rooms with the proposed heat network,*

iv. *A strategy to facilitate the connection of the network to the development; and*

v. *A strategy to facilitate access to the site and plant rooms for the heat network developer to carry out works required to connect the site to the Shoreham Heat Network, lay underground infrastructure within the roads, footpaths, open space and public areas of the development, and carry out repair and maintenance work to any heat network infrastructure; and*

vi. *Measures to protect plant rooms and other related equipment form flood risk*

This application seeks to remove Condition 33, as set out above that requires the development to be designed to accommodate connections to an off-site Heat Network.

This is not considered reasonable, deliverable or sustainable for the following reasons and therefore should be removed from the planning permission.

Availability of the Shoreham Heat Network;

As discussed with ADC officers, the Shoreham Heat Network proposals are not being pursued currently, with no site, funding or a sustainable energy strategy. It should also be noted, that the previously envisaged gas fired solution to the Heat Network is not considered to be either sustainable nor aligned with the Governments commitment to reduce reliance on gas as a source of energy/heat.

There is currently no prospect of such a facility being delivered in Shoreham and therefore it is entirely unreasonable to require a developer to facilitate connections to a proposal that is very unlikely to come to fruition.

Furthermore, based on the timings of the S.106 obligation, and prospective build programme the Heat Network would need to be online by 2028, which based on the above matters is extremely unlikely.

Alternative Energy Strategy;

As set out in the SRE Energy Review Summary document, the proposal has been re-designed to present a more energy efficient development than could be achieved through the connection to an off-site Heat Network.

The ‘Planning Strategy’: gas based communal heating & hot water system proposed at planning (8th January 2020 Energy Statement – and listed in Planning Condition 34) and the ‘Proposed Strategy’ individual electrically based heating & hot water system has been tested to show the energy savings possible without a hot water system, that would necessary to connect to an off-site ‘heat network’.

The document provides clear evidence that the proposed energy and hot water strategy would result in a significantly more sustainable and energy efficient development, with following key savings;

- **Total energy use across all units is >20% lower for the Proposed Energy Strategy compared to the Planning Energy Strategy**

- **Total carbon emissions across all units is >50% lower for the Proposed Energy Strategy compared to the Planning Energy Strategy.**

Annual Running Costs;

The SRE report analyses the running costs of the proposed energy strategy compared to the planned energy strategy that relies on a wet hot water/heating system, required to allow connection to an off-site heat network. The results identify clear savings for future occupiers of the proposed energy strategy, which is a significant benefit of the amended strategy.

'The proposed strategy (being electrically focused) results in a range of predicted average annual running costs from - 6.7% to -1.9% reduction in cost over the three pricing periods.' SRE Report November 2022.

Additional Design/Build Costs to facilitate future connection to Heat Network;

Due to the significant infrastructure required to allow a future connection, additional plant space, ceiling voids, cupboard space etc will need to be designed into the development. The additional costs of such provision have been estimated at circa £1.5-£1.7 Million.

Such a cost burden is considered entirely unnecessary and unreasonable when a more sustainable and energy efficient solution to heating and power has been produced.

Retrofitting Issues;

Notwithstanding the cost implications of constructing a building capable of future connection, there are significant issues associated with the retrofit for future residents.

The development is likely to be completed and occupied in 2025 and therefore any updates to the heating will lead to disruption to residents, including the need to interrupt energy/heating/hot water supplies. This will require a programme of works that may require residents to be temporarily re housed to allow the works to be undertaken.

Such requirements are considered unreasonable and impractical.

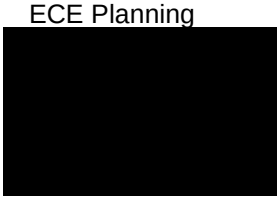
Summary;

For each of the aforementioned reasons, there is no justification for a scheme to allow future connection to an off site heat network, when a highly sustainable alternative offer of energy and heat management design is proposed that will exceed the targets achievable through the method sought via condition 33.

We trust therefore that the information provided justifies fully why Condition 33 should be removed and the revised energy strategy accepted in relation to Condition 34 (to be discharged separately)

If you have any further queries or require further information, please contact me on 01903 248777.

Yours sincerely
ECE Planning



Chris Barker MATP MRTPI
Managing Director
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