

Dear Shaun, as discussed I would like to make the following representation at the planning committee on Tuesday regarding the Lotmead planning application. I will refine and consult on it before the meeting and am happy to make any clarifications needed, please call me if needed.

The application has good energy and sustainability statements detailing the measures that could be taken to ensure good energy efficiency, but I feel it needs an important clarification in respect of the guidance from the council on the level of ambition required by the local plan.

Energy efficiency is important for our local and national economy as well as the climate. Annual savings in energy costs can outweigh additional upfront costs within a decade, and efficiency measures are much cheaper to implement during design and construction rather than retrofit. The occupants will find the properties more affordable to live in for the lifetime of the home. Less money wasted on unnecessary energy bills means more money for the local economy, less energy imports (as the UK is now a net importer of energy). Energy is responsible for over half of our climate emissions in the UK, so it is really important to take every opportunity to reduce this. The council resolution early in 2019 confirms the council's intent to reduce our emissions in Swindon, and we now have a cabinet member responsible for this.

Whilst the Code for Sustainable Homes is no longer recognised as a standard that can be enforced, the government allows and encourages local authorities to require new homes to meet equivalent energy efficiency standards. The latest planning guidance <https://www.gov.uk/guidance/climate-change#statutory-duty-on-Climate-Change> confirms that councils can still call for energy efficiency standards equivalent to CSH level 4. And various decisions from the planning inspectorate such as this one <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3129898&ColD=0> confirm their view that the government intention is to maintain and increase the energy efficiency standards.

If the committee is minded to grant the application, I feel that there should be a condition attached requiring this.

The simplest way to do this could be to call for a minimum SAP value of 86 or above. This report from Stroud district council explains further [https://www.stroud.gov.uk/media/1070871/environmental-requirements-for-new-build-development\\_redacted.pdf](https://www.stroud.gov.uk/media/1070871/environmental-requirements-for-new-build-development_redacted.pdf). The report also shows that this is a perfectly feasible requirement, with most good new builds achieving similar. The viability assessment does not explicitly mention the target energy efficiency and should not be significantly impacted. If this requirement is met by 'fabric-first' measures as listed in the application, like insulation, air-tightness and MVHR, it should not have a big impact on build costs. An alternative approach could be the specification of the DER target, and this has been successfully used by Brighton according to the report.

Given that this is the largest application expected for some time in Swindon and there are others to follow in the NEV I feel it is very important that the committee

starts now to signal its intention, rather than leaving it till the reserved matters application when it will be more difficult to incorporate the condition.