

## Appendix 4

<b>Holly Lodge Estate Energy Efficiency Planning Guidance Consultation Responses</b>			
	From	Comment	Officer response
1	Anonymous	Level of advice is not enough, works carried out in accordance with this draft planning guidance would not preserve the character and appearance of the CA, and it has not identified all the opportunities for improving energy efficiency/reducing greenhouse gas emissions in the CA	
2		Re preservation of the CA; Directly yes; Indirectly no. Weather changes from high CO2 levels (this guidance does not achieve required limits) would affect character and appearance. These include flooding, overheating and increased levels of air pollution	Noted; no change made.
3		Needs info about stated role of domestic buildings in meeting Camden's CO2 reduction targets	This is referred to in S1, with a link to the webpage for the report and reference to the Green Action for Change document which sets out in more detail the ways that Camden is aiming to meet these targets.  Reference to why homes are important in reducing energy use added to Exec Summary.
4		Think film pv is not mentioned – can be amenable to heritage buildings	Yes, but efficiencies can be very low and the costs are high. Reference to this added 4.7 technical section
5		Needs info on energy process, and about past price rises	Not included as we consider that these fluctuate too often and for too many reasons for the info to be useful.
6		No mention of embodied energy/ greenhouse gas production in manufacture	True, this has not formed part of our assessment or advice in either of the two pilot projects.
7		Domestic context to Camden's 40% CO2 reduction targets needs to be more specific. How much wall insulation is needed to meet this?	Reference to 'half of Camden's homes' included in S1. Added in total figure of 95k.

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8		No info on current funding (CERT) and assumption that the Green Deal will go ahead.	CERT is ending and ECO and Green Deal has been approved by Parliament.
9		No evidence base for behaviour statements, lack of motive knowledge	Removed 10% figure, replaced with 'significantly' as this depends on how efficient home already is.
10		No info on the ranges given (in carbon cost effectiveness table)	We don't want to include actual numbers because they can quickly become outdated
11		Ground Source Heat Pumps – gets RHI	GSHP has been omitted from table as not applicable in Camden
12		SWI insulation guidance assumes everyone will be installing a DPC and vapour impermeable insulation. What about breathable?	Added text in line with CPG3 - Sustainability on use of breathable materials at 4.1
13		'Thin high performance insulation board' is a vague statement considering emphasis on condensation risk. More info is needed – saying 'aerogel' is a good start.	Technologies developing and hence don't want to recommend any specific products. Have advised householders to seek professional advice for specifications.
14		Put a list of insulation materials showing thickness required on 9" brick wall to achieve building regulations and whether breathable or not	Note for borough wide guidance, dependant on outcome of trad house monitoring studies. Links to elsewhere?
15		Spacia windows (as used in Camden before?)	Don't want to selectively identify individual products (Pilkington vacuum double glazing) but will consider how we may expand on available products in borough wide guidance
16		More options for ventilation (i.e. Ventive systems) which suit heritage ideals of paper	Reference added to 4.6 Technical guidance (Passive Stack Ventilation) on use of this system in disused chimneys.
17		Heating controls info outdated – remote controls. Needs modernising	Wireless programmable room thermostats already included in Technical guidance section.
18		Electric heating should be discouraged if CO2 reduction is an aim of the paper	HG? (Added biomass section in S4 Technical guidance as DPEEPG)
19	Dermot Alexander	Level of advice is not enough, works carried out in accordance with this draft planning guidance would	

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		not preserve the character and appearance of the CA, and it has identified all the opportunities for improving the energy efficiency/reducing greenhouse gas emissions in the CA	
20		Leaseholders in flats should be given the same rights to install double glazing if the materials of new windows are of similar appearance to the existing ones	This would require a relaxation of the requirements of the National General Permitted Development Order which Camden is not empowered to do.
21		Emphasis on timber as a materials for double glazing is misguided ...It is not the material but the final appearance that matters. Other materials can actually look better than timber. That is because thinner frames are possible, more similar in proportion to the dimensions of the original windows.	Disagree – the specific problem with frames of different materials is that they cannot replicate the dimensions of appearance of timber windows accurately. Timber is an inherently sustainable, durable materials which we expect to be retained in all CAs, and upgraded where necessary.
22		The restrictions on solar panels are too onerous. I believe this technology is the victim of unfair discrimination.	The restrictions on solar panels have been relaxed by government through amendments to the General Permitted Development order in recent years. However, the Council is not empowered to make this less restrictive.
23		The main threat to the character of the estate does not come from energy efficiency measures but wide scale inappropriate development. Front gardens are being paved over, timber panels removed or whitened out, front doors replaced etc. Developers are ripping the heats out of buildings completely unchallenged. To fret about solar panels while all this is going on is failing to see the wood for the trees.	Noted. Power available to council to address this is Article 4 which was recommended by officers in 2009 but refused by Environment Sub committee in light of strong local opposition. The case for the Art 4 has not diminished, but due to the situation appearing relatively stable we are not proposing to introduce Article 4 now, but will monitor situation.
24	Marie Helene English	Level of advice I enough, works carried out in accordance with this draft planning guidance would preserve the character and appearance of the CA, and it has identified all the opportunities for improving	

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		energy efficiency/reducing greenhouse gas emissions in the CA.	
25	JT Lillie	Level of advice I enough, works carried out in accordance with this draft planning guidance would preserve the character and appearance of the CA, and it has identified all the opportunities for improving energy efficiency/reducing greenhouse gas emissions in the CA. Level of advice I enough, works carried out in accordance with this draft planning guidance would preserve the character and appearance of the CA, and it has identified all the opportunities for improving energy efficiency/reducing greenhouse gas emissions in the CA.	
26	Jackie Jones	Level of advice is not enough, works carried out in accordance with this draft planning guidance would preserve the character and appearance of the CA, and it has not identified all the opportunities for improving energy efficiency/reducing greenhouse gas emissions in the CA.	
27		A tremendous initiative and a most welcome document	
28		Struck by a disconnect between some of the sections, potentially confusing, mentions a number of instances where title could be changed, sections moved or repetition removed, to clarify.	Repetition removed ( 'making a low carbon retrofit plan' and 'low cost no cost measures') by deleting from S4 Technical guidance and consolidating S2 – Making a low carbon retrofit plan. S4 technical guidance re-arranged to tie in with framework used in S2 Low carbon retrofit plan (in line with DPEEPG).
29		Document title – the document offers more than planning guidance – change e.g. to Energy upgrading (or retrofitting) your Holly Lodge home;	Not altered on this document but will consider for borough wide guidance.

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		steps to consider and planning guidance' ?	
30		Section 1 – avoid starting with climate change as it a turn off for some people.	1 <sup>st</sup> para of Exec summary changed;
31		Differentiate between energy used for heating and electricity consumption	No changes made.
32		Note an upward trend in homes' internal temperatures, and taking these measures ensures comfort while protecting against certain rises in gas and electricity	Included in S1
33		Amend S1 wording away from 'resource depletion' towards 'difficulty ensuring a secure supply'	Amended S1
34		Proposed changes to wording in paras 1.2, 1.3 to clarify intention/ make more accurate	Amended
35		Section 2 – expand list of trigger points to include things like updating a kitchen or bathroom, laying new flooring, renewing plumbing, redecorating rooms, redecorating exterior, redecorating stairs and landing, adding fitted wardrobes.	Included
36		Prioritising: misleading in relation to what to do if they are at trigger point.	Added para after lower cost demand reduction measures
37		Mention Green Deal in relation to subsidies and grants altering 'natural order' (pg 8)	Added Renewable Heat Incentive here as other subsidy example.
38		Carbon cost effectiveness table – a bit rough and ready, almost misleading by not having a timescale. Not sure its worthwhile in this document. Fails to link in with what appears in s4 – Technical guidance	Recognise that this is a broad guide only, and was added in response to requests from the first pilot project for a way of comparing costs and benefits.  Table amended to relate consistently to advice in S4 as described elsewhere in this table.
39		Believes CO2 emissions for a & G SHP is overstated, especially if alternative is gas central heating. Why include GSHP as S4 says is not applicable in Camden.	Deleted GSHP, and reference to its applicability in Camden added in precursor text.  Table was included to show the relationship between

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		Why not include benefits, as in S4?	cost and CO2 reduction; adding in benefits will make table too large and unwieldy so we consider these are best left in Technical Guidance section.
40		Double glazing – entry in carbon cost-effectiveness assumes replacing entire windows rather than upgrading glazing, and neglects secondary glazing altogether.	Secondary glazing added.
41		Section 3 – should clearly differentiate between energy efficiency measures and microgeneration or renewable energy generation.	
42		Several instances where this section seems not informed by detail of S4, e.g. double glazing – would upgrading panes (rather than replacement windows ) require PP? S4 states that GSHP are not appropriate but S3 states no planning permission is required to sink a vertical heat loop in the area. Is this appropriate.	Added replacement panes in PP table. Re need for PP for GSHP – this is required by the national General Permitted Development Order. Only way to increase control would be through use of Article 4 direction.
43		Public benefit para – why is this included in the planning guidance section	Because it is a requirement of the National Planning Policy Framework that any harm to a heritage asset (i.e. a building in a conservation area) is weighed against any public benefit that is achieved. This section explains what matters we will consider when determining a planning application for these types of works in a conservation area.
44		General – lack of differentiation between different products on the market with regard to solar pv and hot water. Solar pv only differentiates between mounted panels and solar slates, but no differentiation between framed/frameless, or between polycrystalline silicon (blue) and monocrystalline (black) nor those that have front or rear (visible or invisible) contacts. A hotch potch solution on roofs is	Partly constrained by General Permitted Development Order only allowing us to control ‘siting’, unless we introduce Article 4 direction (which could be in tandem with an LDO for specific types)

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		a poor solution. Strongly recommend taking another look at this, even revisiting the issue of street visibility for PV modules of certain appearance. Or instance, ask 4-5 suppliers each to make a theoretical proposal for aesthetically pleasing PV for a) tiled and b) slate roofed buildings in Camden's CA and see what they come up with? Why shouldn't it be harder to get planning permission for some solutions than others	
45		Strongly recommend that Camden draws up guidelines for acceptable pv visibility from the street.	Noted, will consider for the borough wide guidance
46	Highgate Society	Welcomes, supports and endorses this document and congratulates the authors on setting out clearly and sequentially what is a very technical paper.	
47		Would like to see reference to potential impact or harm of solar panels on heritage assets other than conservation areas, e/g/ listed buildings and MOL such as HH	Not within scope of this guidance – refer also to request from Jackie Hones above for guidance on solar pv visibility for possible further work.
48		Would be prudent to advise all potential installers to apply for CoL of planning permission, not least to avoid disappointment and enforcement costs.	This advice is in 3.2.4 – expanded to include 'your agent'.
49		Mention was made, in DPCA EEPG, of views over roofscapes. Would this not apply here and in other parts of the borough?	Yes it would apply, where it is considered significant to the character and appearance of the CA it would be identified in the Conservation Area Appraisal.
50		Solar slates – have two points to add: <ol style="list-style-type: none"> <li>1. As they are laid in with roofing slates and therefore form part of the waterproofing layer, if someone is considering both re-roofing and solar PV renewables the economics of solar slates changes.</li> <li>2. 2. Solar slates are considerably smaller PV elements than solar panels. If there is any shading, a solar panel would not generate</li> </ol>	Included re-roofing/renewable energy in trigger points at 2.1  Added to 4.7 Technical guidance

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		electricity whilst in shade. In the case of solar slates it would be only those slates affected by shade which would cease to generate electricity. This too changes the economics.	
51	Cllr Maya de Souza on behalf of residents	Structure confusing and not clear what this document is about. There is also a lot of mention of peak oil, which no longer rings true with shale gas and could be left out.	Amendments to structure – S1 text re resource depletion amended. Repetitious text removed . S4 – redraft to tie in with framework recommended in S2 – low carbon retrofit plan (in line with DPEEPG) There is no mention of peak oil in the document
52		Confusion of visibility with being unacceptable visually: I understand that there are lots of variations in colour of PV and installations can make a difference to how the panels are perceived. Some panels not much different from velux windows which we don't have much of a problem with	Revised 3.2 Planning guidance text in line with DPEEPG.
53		Lack of clarity as to what sort of windows are acceptable and when planning permission is needed.	Wording altered in S4 technical guidance to omit reference to windows that wouldn't be acceptable.
54		Missed opportunities to recommend external wall insulation for the backs of some houses, especially the mansion blocks.	3.2.1 sets out the likelihood of this being acceptable in planning terms. Document doesn't make recommendations of one measure over another per se as it might not be the appropriate measure for that particular resident. Need to specify measures for each house in relation to how it is used.
55		Doesn't try to show what sort of things may be acceptable if done consistently and to encourage a consistent approach.	Guidance does refer to importance of semi detached properties retaining their visual integrity at 3.2.1. Noted in context of other comments re solar panels, and will consider this further for borough wide guidance.