

Communications
East Devon District Council
Knowle
Station Road
Sidmouth
EX10 8HL

3rd January 2018

Dear Sirs,

**The Cranbrook Plan: Preferred Approach
Consultation Response**

I note that some of my comments on the Cranbrook Development Plan Issues and Options Report have been incorporated in the Preferred Approach document set which I welcome. However, I am disappointed that the Masterplan document makes no mention of Cranbrook's vision as an Eco-town or its commitment to zero carbon development. My comments in this regard contained in my response to the Development Plan consultation in July 2016 remain.

There is one important issue tucked away in the Preferred Approach documents set which I would like to raise specifically regarding the use of renewable energy capacity as an indicator in the Monitoring Section of the Sustainability Appraisal (section 9).

Item 14 in the table 9.1, the objective "To contribute towards a reduction in local emissions of greenhouse gases", suggests an indicator of "renewable energy capacity installed by type". This should be amended to "renewable energy generation in kWh by type over a monitoring period" as it is the amount of energy generated, not the potential capacity to generate it, which indicates greenhouse gas emission reduction.

Item 16 in the table 9.1 "To ensure energy consumption is as efficient as possible" suggests the same indicator of "renewable energy capacity installed by type". Renewable energy capacity is not a measure of consumption efficiency and is not the correct indicator for this objective. The objective itself is very broad when considering all energy used at Cranbrook i.e. electricity, heat and transport fuel. Energy efficiency in this context will be determined by many factors which are likely to be too complicated to monitor. I would suggest that the objective is amended to "to ensure that the energy efficiency of buildings is as high as possible". The main factors effecting building energy efficiency are the fabric of the buildings and the efficiency of the source of that heat which, in the case of Cranbrook, is the district heating system. The fabric of the buildings at Cranbrook will be those set by building regulations which have prescribed monitoring procedures under building control. The efficiency of the district heating system is therefore the key energy efficiency indicator and can be described as "the heat delivered to buildings by the district heating system in kWh divided by the calorific value of fuel into the energy centre(s) in kWh over a monitoring period".

Yours faithfully,



Head of the Centre for Energy and the Environment

