



Objection to Planning Application : Reference: HS/FA/21/00327

**Description:** Business park development to deliver business units consisting of 4010m<sup>2</sup> of light industrial/manufacturing units (use classes E/B2), 490m<sup>2</sup> of bespoke space for a local employer, and the renewal of planning permissions HS/FA/16/00330 & HS/FA/18/00761 for car showrooms (1215 sqm. Location: Queensway North, Queensway, St Leonards-on-sea

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ESC and its sister co-operative Energise South are currently the only community energy co-ops in Hastings, Rother and Eastbourne. Working together they address the twin challenges of energy poverty and runaway climate change through delivering energy advice and generating community owned renewable energy assets in the region. They have a memorandum of co-operation with Hastings Borough Council to support its net zero carbon target through shared renewable and low carbon energy schemes. For example, Energise South has installed solar panels on the Innovation Centre in Hastings, at no capital cost to SeaChange (the building owners). The panels generate solar electricity at over 120% of their anticipated output and the centre pays a reduced price, saving money, energy and carbon. This is an indication of the high level of solar irradiation in the area and its potential value to the local economy.

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**Context.** Concerned residents asked Energise Sussex Coast to comment on the Sustainability Statement produced by SeaChange in support of its planning application. (HS\_FA\_21\_00327-SUSTAINABILITY\_STATEMENT-857399.pdf)

### Conclusion

Other environmental objections notwithstanding, this application should be rejected on the basis of the claims made in the Sustainability Statement alone. If planning was granted and the statement made public, this would risk significant embarrassment to the council and its aim of becoming a pioneering low carbon town, particularly in the national context where the UK has legislated to build a net zero carbon economy by 2050, in large part by phasing out fossil fuels in favour of electric heating and transport powered by renewable energy sources, and when the UK will be under global scrutiny as the host of the COP 26 climate summit in Glasgow in November 2021.

### The Statement

The statement makes a number of misleading and inaccurate claims. The most glaring of these is the claim that gas heating is sustainable. (Section 4.3.1) *"This approach {using a gas combi-boiler heating system} ensures that the scheme delivers optimum efficiency, whilst minimising the emissions of pollutants, such as carbon dioxide emissions and nitrous oxide emissions, into the local environment and atmosphere".* A statement like this at COP26 would make Hastings Council (and the UK's zero carbon commitment) a global laughing-stock.

The Government announced in November that a previously announced date for the ban on gas boilers for new builds of 2025 was going to be brought forward to 2023. No gas solution can be sustainable.

Energise Sussex Coast is a Community Benefit Society ( IPS 31639) registered at McPhersons Accountants

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At 4.2.6 it states;

*Traditional fossil fuel back-up boiler plant would also be required to provide robustness in heat supply (biomass boilers are inherently less reliable than traditional gas boilers as they must transport a solid fuel and ash residue).*

This is inaccurate. There are good examples of local biomass district heating schemes. One installed in 2015 has two boilers for resilience. Though some old oil boilers were retained, they have not been needed. In six years of operation, there has not been one day of unserved heat demand. It is just a question of choosing reliable kit and designing in redundancy (which is, after all, what the oil boilers would be under this proposal). There is NO reason why the redundancy has to be fossil fuelled.

At 4.2.9 it states that, in talking about Solar PV:

*the complete cost (equipment, installation, and permissions) would be in the region of £1,000 - £1,500 per kW*

This entirely depends on the circumstances, particularly the size, of the system. Recently installed commercial rooftop systems in the region cost less than £660/kW. The projected outputs from solar are also inaccurate, as we have shown on other solar sites in Hastings.

On heat pumps, it states in 4.2.3 that - *COPs must be better than 2.5 before there is any reduction in CO<sub>2</sub> emissions compared to heating via gas or gas fired condensing boilers.*

This is completely inaccurate. The carbon intensity of a new gas boiler is around 210 - 230 gms CO<sub>2</sub>e/kWh. The carbon intensity of electricity is already less than this. In fact, for last year it is expected to be around 180. That means that the COP could be LESS than 1 for a heat pump and it would still do better than a gas boiler. Further, the gas boiler figure stays constant. The electricity figure continues on down during the life of the heat pump (or boiler) so, on a whole life measure, would be even better still. The gas figure does not include fugitive methane emissions in the supply chain so is, in fact, even higher.

SeaChange, when it was Sea Space, had an important lesson from the development of the Enviro-21 Business Park on Queensway where it claimed to be creating a state of the art sustainable eco-technology park. Yet the roofs of the units which could, as shown with the Innovation Centre, generate significant amounts of solar electricity, were designed in such a way that they could not support solar panels. Planning consent was granted for a wind turbine but it was never installed. The Energy Efficiency rating of the park ( its EPC) was D. The park was repossessed by Creditors and Seaspace went into liquidation, having failed to generate the 500 green jobs it promised. We believe there is 3.5 acres of undeveloped but consented commercial land on the Enviro-21 Park site, though this no longer belongs to SeaChange.

Hastings Council can set much higher standards for sustainable development if it wants to boost green technologies and green jobs in the region, as well as avoid public exposure and embarrassment for consenting to this unnecessary, unsustainable and environmentally damaging proposal.

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