

Orkney Renewable Energy Forum  
 Charles Clouston Building  
 Back Road  
 Stromness  
 KW17 3AW

14/4/20

Orkney Islands Council  
 Planning Department  
 School Place  
 Kirkwall

Dear Sir,

**Housing in the Countryside Consultation**

Generally the intent of the guidance is welcomed.

OREF is concerned, however, that 'Nett-Zero' is not mentioned in the document at all and should be an underlying principle. OREF notes that the issue of a Climate Emergency was raised in the consultation that led to this document but is surprised that it was categorised as requiring 'No Action'.

Member of the Public	5 OIC having declared a "climate crisis" surely the Site Development Statement should explicitly address carbon emissions from the production and usage of proposed building materials and the carbon footprint of the dwelling and vehicle for residents over the long term - 20 years.	Noted and this one aspect of the Site Development Statement as well as building orientation for passive heating and day lighting and / or the retention of existing buildings to realize their embodied energy. Additionally it should be noted the environmental consideration with the Scottish Building Standards system in terms of the efficiency of new builds as well as standards used to consider the carbon footprint of building materials.	No Action.
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Extract of Committee report. Sept 2019

Given the importance of this topic, and that it is generally accepted that all OIC policies need to be overhauled in the light of the need to deliver Nett-Zero, this is a missed opportunity. OREF would point out that OIC was the first signatory to the Climate Change Declaration, but has made limited progress since; progress that OREF believes has been held up in part by inadequate commitment to setting out climate appropriate policies and guidance. This document presents such an opportunity but is disappointed that it is being missed in this document. OREF therefore asks OIC to take the opportunity of the guidance revision and make a proper commitment to Nett-Zero. Now.

OREF is also concerned that there is a slight risk that innovation will be stifled by the application of the guidance, however it is hoped that the judicious application of common sense by the Planning Officers will allow good architecture to emerge.

OREF believes that an over application of prohibitions of new designs runs the risk of slowing the transition to Nett-Zero housing. 'Fitting in with the existing' must not lead to 'repetition of the existing' in the form of shoddy housing. Clearly continuing to do what has been done to date in Orkney will not lead to the zero carbon or indeed carbon negative

housing. Since that must be the County's goal it is important that nothing gets in the way of that outcome.

OREF would therefore welcome more positive statements as to the expectation that all housing to be built henceforth should be Net-Zero.

**3.08** OREF particularly welcomes the 2nd bullet point about types of housing that can be replaced:

*“An existing house that has no historic or environmental merit, which provides a sub-standard level of living accommodation that is unsuitable for renovation to form a modern and energy efficient house.”*

There is a great deal of this sort of housing in the county and overall OREF believes that the wholesale replacement of such properties will make more sense than perpetually tinkering by adding on fixes here and there. The admission that, for example, a blocked in WW2 hut is not suitable to be the core of 21st century living in the countryside and we would be better off to knock things down and start again with a Net-Zero design is now essential.

OREF therefore strongly supports the retention of this point in the guidance.

**Pg 14.** Single House in-Fill. It is not clear why this is being applied to single houses. There may be occasions where several houses could be built in one small scheme and this should not be prohibited. There are two opportunities that this guidance will prevent:

1. There is no need to limit some infill sites to a single property. As an example OREF would point to diagram 3.24. The plot shown could support several houses and it is unclear why this would be prohibited. The same applies to 3.30. Indeed it would be more efficient to provide several houses at such a site since the unit cost would be lower through the economies of scale.
2. Multiple homes in one structure. There is nothing wrong with flats or terraces if properly constructed to generous proportions in the countryside. OREF does not see the need for a requirement for all property in the countryside to be detached and indeed other forms are more energy efficient.

Whilst OREF recognises the intent to limit building in the countryside, OREF does not support the policy as articulated and urges that more thought be applied.

**Pg 19.** It is not clear what 3.32 is seeking to achieve. There is reference to there not being 4 houses in the design, but such a minimum is not stated in the bullet points in 3.20. Furthermore OREF also sees no reason for such a minimum qualifying criterion.

#### Omissions:

**EVs:** There is no explicit reference to the fact that all houses will need to provide electric vehicle charging on the property as standard. This should be rectified as a global statement in the guidance and be the expected norm henceforth.

**Appendix 1:** OREF is extremely disappointed that energy efficiency is not mentioned and there is no reference at all to how the properties would be heated or powered. This suggests that this remains a matter that is not within the normal office thinking in the Planning Department and is very worrying. The fixation on just the 'embodied energy' is of limited value. The concept needs to be better explored at looking at the future 'whole life energy costs' of a proposal rather than fall back on what has been done. It is absolutely recognised that the energy invested to date needs to be taken into some account, but it is not clear from the guidance how that will happen. OREF would welcome the opportunity to better explore any tools Officers presently use to ensure the Nett Zero outcome is delivered.

Finally; if the Department would find it useful then OREF would be willing to expand upon any of the points made. However if this letter is dismissed in the same way as all public comments to the first draft were with 'No action' then OREF foresees that this work will have been a missed opportunity. OREF strongly urges that Officers undertake a proper re-assessment of the contribution they must make to Nett Zero.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'N. Jermode', written in a cursive style.

OREF joint chair

Note: This consultation did not appear on the list of consultations on the OIC website. It is unclear why this was the case and should also be looked into as to where the failure of process occurred.