

View Response

Response Details

From Robin Morris

Date Started: 26 Mar 2020 15:46. Last modified: 26 Mar 2020 15:46

Status Complete

Email Address [Redacted]

Postal Address [Redacted]

Postcode [Redacted]

Gender [Redacted]

What is your age? [Redacted]

What is your ethnic group? [Redacted]

Are you disabled? [Redacted]

Areas of Interest [Redacted]

[Redacted]

[Redacted]

[Redacted]

Response ID #798298

Visibility Unknown.

Question 1.

Your Name:

You must provide an answer to this question.

Robin Morris

Question 2.

Your organisation (if applicable):

Low Carbon East Oxford

Question 3.

Your Address:

You must provide an answer to this question.

[REDACTED]

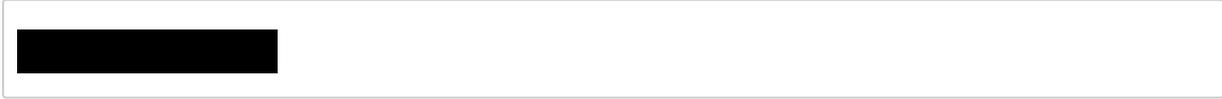
[REDACTED]

OXFORD [REDACTED]

Question 4.

Your email address:

You must provide an answer to this question.



Question 5.

Do you wish to be notified when the Oxford Local Plan 2036 is adopted by the Council?

You must provide an answer to this question.

Yes

No

Question 6.

DATA PROTECTION:

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2036 Main Modifications Consultation only, and we will only store your data until the Oxford Local Plan 2036 is adopted. Information you give in this form will be shared with the Independent Examiners.

Please note: Anonymous representations may not be accepted.

Select at least 1 option.

Select this box if you are happy for us to state your name and the first line of your address and postcode when publishing your response(s).

- Select this box if you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured.

Question 7.

To which Modification(s) or part(s) of the Sustainability Appraisal does this response relate?

You must provide an answer to this question.

Reference MM15. Modification as set out in OCC.1L paragraph 12.58 in response to Q.12 of the Inspectors Initial Queries and Comments (IC.1). Concerning the monitoring ... in the form of post-construction testing.

Question 8.

Do you Support or Object the proposed modification(s)?

You must provide an answer to this question.

- Support
- Object

Question 9.

If you object, please state why:

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182). Please tick any which apply:

- Not positively prepared - i.e. the strategy will not meet development needs
- Not justified - i.e. there is no evidence to justify the modification
- Not effective - i.e. it won't work
- Not consistent with national policy - i.e. does not comply with the law

Question 10.

Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification(s) or part(s) of the Sustainability Appraisal of the Main Modifications.

You must provide an answer to this question.

The original plan proposed "post[-]construction testing in order to improve our understanding of these issues and also to ensure that performance standards are linked to as-built performance."

It is widely recognised that there is a very significant 'performance gap' between the design objectives and the in-service energy performance of buildings. There is a significant disconnect between building control, planning consent, design objectives and the final performance. Without monitoring, little or no effective tools will be in place to be able to address this performance gap, no-one is held to account for any failure to deliver the objectives for energy intensity and carbon footprint. It is well known that the specification of a heat pump and installation of a heating system leaves completely open the question of responsibility for delivering an agreed functionality. There have even been examples of systems - such as combined heat and power - being included in order to meet the planning requirements and yet never being commissioned. The Energy Performance

Certificate and related assessment system are inadequate to the task of delivering certainty about in-use performance. Energy performance of buildings very much depends on the appropriate hand-over to users (for example, soft-landings approach). Finally, there is something like a 10:1 range in energy use for essentially the same property, which depends on demographic, social and normative factors. Assuming that an as-designed performance will be achieved is open to abuse, error, inability to enforce and can best be protected by including monitoring and delivery/restitution clauses. It is the energy consumption which will affect the users' exposure to bills and which ultimately determine the carbon footprint and requirement for supply of renewable energy.

Question 11.

Summary of Representation:

If your reason for support or objection is longer than 100 words, please summarise the main issues raised.

It is widely understood that buildings do not offer as-designed energy performance, for a number of reasons. Post-construction testing is vital if the plan is to assure delivery of the required performance, and retains the ability to ensure conformance with contract, which would otherwise prove impractical to enforce.