

# View Response

## Response Details

**From** Daniel Scharf

**Date** Started: 16 Feb 2020 17:36. Last modified: 17 Feb 2020 10:22

**Status** Complete

**Email Address** [REDACTED]

**Postal Address** [REDACTED] Abingdon Road  
[REDACTED]  
Abingdon  
Oxon

**Postcode** Ox14 4HT

**Gender** Male

**What is your age?** 45-59

**What is your ethnic group?** White British

**Are you disabled?** No

**Areas of Interest** Planning and Regeneration

**Response ID** #782327

**Visibility** Unknown.

## Question 1.

**Your Name:**

You must provide an answer to this question.

Daniel Scharf

## Question 2.

**Your organisation (if applicable):**

Self

## Question 3.

**Your Address:**

You must provide an answer to this question.

■■■■ Abingdon Road ■■■■ Abingdon Oxon OX14 4HT

## Question 4.

**Your email address:**

You must provide an answer to this question.

pause.forthought@gmail.com

## 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.

MM6

MM15

## 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.

MM6 b) incomplete?

MM15 proposes a "Policy RE1: Sustainable design and construction

Planning permission will only be granted where it can be demonstrated that the following sustainable design and construction principles have been incorporated, where relevant:" criteria a), b), e), f), g) relate to energy efficiency, water efficiency, flooding, occupier needs and biodiversity respectively. Only

"c) Using recycled and recyclable materials and sourcing them responsibly;

d) Minimising waste and maximising recycling during construction;" relate to

'sustainable construction'. It is generally accepted (eg see work carried out by NHBC, Committee on Climate Change, RICS and UK Green Building Council

[https://www.ukgbc.org/ukgbc-work/net-zero-carbon-buildings-a-framework-](https://www.ukgbc.org/ukgbc-work/net-zero-carbon-buildings-a-framework-definition/)

definition/) that 50% of the carbon emissions attributed to new house building are

embodied at construction stage. This is down to the use of concrete/cement, steel,

aluminium and glass and the sourcing of recycled/recyclable materials and

minimising construction waste will have minimal effect. In these circumstances

Policy RE1 is internally inconsistent; it will not 'positively' achieve sustainability, the

modification is not 'justified' as it is not based on the relevant evidence on

construction carbon, it would be 'ineffective' in achieving the carbon reductions

intended by the policy, and would not be consistent with the Government's

intention to reduce carbon emissions.

## Question 11.

### **Summary of Representation:**

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

Policy RE1 (and the Energy Statement) would need to include further criteria relating to 'whole life carbon assessments' that would include embodied carbon. Without requiring net zero carbon building (including the 'sustainable construction' that is the primary purpose of the policy) the new building being supported by the Local Plan will significantly overshoot carbon budgets in early years of the next decade during which reductions in carbon emissions will be most important.