

Section	Objector	Summary of representation	Officer response	Officer recommendation
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General				
General	Hoare LEA	<b>Support:</b> Entirely support OOC's commitment to the environmental agenda and building in a sustainable manner. The benefits are now being recognised and addressed by most developers.	Noted	No change to SPD
General	Hoare LEA	<b>Support:</b> The SPD is considered rigorous and all encompassing in its interrogation.	Noted	No change to SPD
General	P. Keiller	<b>Support</b>	Noted	No change to SPD
General	Oxfordshire County Council	<b>Support:</b> Support the SPD as a positive attempt to try and improve the sustainability of new development. This is consistent with policy G6 of the Structure Plan.	Noted	No change to SPD
General	Countryside Agency	<b>Support:</b> Strongly support the SPD which seeks to reduce energy and water demand, re-use and recycle demolition and construction waste, and promote the integration of renewable energy in new development.	Noted	No change to SPD
General	Countryside Agency	<b>Comment:</b> A link must be made between sustainable construction technique and quality of design, as done a little in paragraph 54. Would welcome the consideration of how sustainable construction techniques could affect townscape character areas and how these areas could influence the choice of appropriate technique.	Paragraph 10 also addresses this issue: <i>"It will not be appropriate for a development to incorporate all the measures set out here. There will always be a need to balance the benefits of these measures against the wider design policies of the Local Plan"</i> .	No change to SPD.
General	Westwaddy ADP	<b>Comment:</b> Concern that the proposed approach is different from both the Eco-Homes Standard and forthcoming Code for Sustainable Homes as well as possible central Gov guidance in the form of a new Planning Policy Statement. Schemes which provide affordable housing need to meet Eco-Homes Very Good anyway so requiring a different standard may well be a needless paper chase.	Existing approaches such as BREEAM take a much broader view of sustainability in their scoring systems, the NRIA approach provides a focus on those aspects of priority to OCC. If an EcoHomes assessment has been carried out it will be straight forward and not onerous to produce an NRIA alongside it. Affordable Housing only needs to pass "good" standard if it is to get Social Housing Grant.	No change to SPD
General	Westwaddy ADP	<b>Comment:</b> Paragraph 15 refers to the special circumstances of Oxford, but it is not explained what these are. The main difference is the NRIA is required to accompany the planning application whereas the Eco-Homes Assessment evolves during the commissioning process.	OCC have decided to produce an Oxford specific approach that reflects their priorities of energy efficiency, renewable energy, materials, recycling and water use as required in the adopted Oxford Local Plan. It is important that the NRIA is completed at the start of the development process to ensure the issues are fully integrated into the design.	No change to SPD
General	Westwaddy ADP	<b>Objection:</b> Is now is the best time to be introducing this guidance? We do not yet know exactly what the Code for Sustainable Homes will say; we do not yet	The publication of the Code for Sustainable Homes is still some way off and will not cover	No change to SPD

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		know what the effect of the new Building Regs will be. This guidance should be delayed until after the introduction of the Code for Sustainable Homes to ensure consistency and a uniform approach.	(as previously planned, non-residential buildings), the priority of the Council is clear, the Local Plan policy is adopted, and as such it is appropriate to produce the SPD. The Local Plan Inspector said further guidance was required prior to implementing Policy CP.18.	
General	Westwaddy ADP	<b>Objection:</b> We've already seen the City Council demand that the submission is made by a qualified Eco-Homes Assessor; such a statement is not made in the SPD itself and is unreasonable. There is no information on the training that staff have in this field. Lack of trained staff could lead to delays and/or refusal where minor changes would have resulted in consent, further damaging the City Councils success rate on appeal.	There is no requirement for NRIAs to be completed by EcoHomes assessors. There is existing expertise within the planning department and other Council departments. For complex cases, outside advice will be used on a consultancy basis.	No change to SPD
General	Westwaddy ADP	<b>Objection:</b> It is not explained how a change in circumstances will be dealt with, not all planning permissions are implemented on consent. E.g. a local source could be specified in the NRIA, but no longer be available when the scheme is implemented, or if a better, more efficient product becomes available, how could this be incorporated into the development? There needs to be flexibility to amend the supplier due to changed circumstances.	It is recognised that technological development is moving very fast and that this may happen in the period between permission and implementation; however it is important that the approach of the design team is assessed at the time of the application. If a developer is concerned that this has happened he can revisit the issue with planning officers at a later stage.	No change to SPD
General	Westwaddy ADP	<b>Objection:</b> We assume the implementation will be secured through an appropriate worded condition, so query the level of information required at the application stage. Experience on related planning conditions already shows that an excessive level of detail is sought.	In order to maximise the benefit of resource efficiency measures and technologies, it is important that they are considered in detail at the earliest possible stage, as part of the design of a scheme rather than as an add-on, as such it is considered appropriate to seek detail at the application stage.	No change to SPD
General	Oxford University Estates Department	<b>Objection:</b> Building regulations deal more effectively with these issues than planning can, the policy should be refined to remove the overlaps (particularly with energy efficiency).	This was dealt with at the Local Plan Inquiry and the Inspector felt that it was appropriate for planning to be involved. Planning is usually the first body to view a proposed scheme; it is possible to find low-tech solutions at the beginning of the process, but by the time building regulations are involved it is often only high-tech solutions that remain and opportunities have been missed. It is therefore important for planning to be involved.	No change to SPD
General	Oxford University Estates	<b>Objection:</b> The degree of information required at the stage of planning application requires great commitment in terms of developer time and costs.	In order to maximise the benefit of resource efficiency measures and technologies, it is	No change to SPD

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	Department		important that they are considered in detail at the earliest possible stage. As such it is considered essential to seek detail at the application stage.	
General	HBF	<b>Comment:</b> Concern where there is overlap and duplication between the different regulatory regimes and where individual local authorities seek to take the law into their own hands. The local plan inquiry inspector accepted much of the council's case for including policy CP19a, as it was then, in the local plan. However, that was prior to the publication of what originated as the Code for Sustainable Buildings. If we as a country are to move towards an even more sustainable future then the last thing we need is each and every local authority prescribing its own different requirements for energy efficiency in new building.	The publication of the Code for Sustainable Homes is still some way off and will not cover (as previously planned, non-residential buildings), the priority of the Council is clear, the Local Plan policy is adopted, and as such it is appropriate to produce the SPD.	No change to SPD
General	HBF	<b>Object:</b> The SPD is actually counter productive. It should be withdrawn pending the adoption by Government of the national Code for Sustainable Homes after which time it may be appropriate for a new SPD to be prepared in accordance with the national code.	The publication of the Code for Sustainable Homes is still some way off and will not cover (as previously planned, non-residential buildings), the priority of the City Council is clear, the Local Plan policy is adopted, and as such it is appropriate to produce the SPD	No change to SPD
General	HBF	<b>Object:</b> Concerned at the volume of information that is required to support planning applications increasing the costs, the complexity and uncertainty leading to delays and to development being frustrated. All at a time when Government's stated objective is to achieve a significant increase in house building in the region. Given the phenomenal scale of claimed housing need in Oxford anything which threatens the delivery of housing, or seeks to delay it or further increase its cost, cannot be sustainable.	In order to maximise the benefit of resource efficiency measures and technologies, it is essential that they are considered in detail at the earliest possible stage, as such it is considered appropriate to seek detail at the application stage.	No change to SPD.
General	HBF	<b>Object:</b> The SPD must concern itself with issues that are capable of being monitored and enforced and should offer practical guidance and help rather than being a wish-list of so-called sustainability measures. It should provide guidance on how the council will assess the information submitted by developers and what weight it will give to the various different aspects of sustainability in order that developers can improve their "score".	The document does offer practical guidance. The template and checklist offer developers clear indication of the Council's intentions. The checklist particularly provides clear indication of how a scheme can be improved.	No change to SPD
General	Jack Straw's Lane Association	<b>Comment:</b> Whilst the recommendations are commendable, they are unlikely to translate into significant changes in building and development unless there are statutory requirements for builders and developers to comply.	The Local Plan policies as supported by this SPD provide the City Council with the means to ensure resource efficiency measures are integrated into new buildings over the threshold. They can be conditioned and enforced as with other planning requirements.	No change to SPD
General	GOSE	<b>Comment:</b> May wish to consider how Oxford City Council's own requirements can be better harmonised with national and regional initiatives, most notably	The draft Code for Sustainable Homes has been used to help format the SPD. The City	Text added to the end

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		the Code for Sustainable Homes. We would urge you to consider how best to help applicants for permission understand what is expected when applying, and more importantly how the City Council will use the information and implement its policies. For example, it is not clear as to how the information submitted as part of the NRIA will be used inform a decision on the planning application, or any conditions that may be attached to it.	Council has clear intent to provide a compulsory measure of resource efficiency for both residential and non-residential developments and therefore the SPD has been drafted to have a broader scope than the CSH as currently drafted. Text will be added to paragraph 16 that reads: <i>“Information submitted in an NRIA will be used to assess a scheme’s compliance with the policies of the Local Plan. Where appropriate the City Council will use conditions and / or legal agreements to secure the commitments made in an NRIA.”</i>	of para. 16.
General	Linden Homes	<b>Comment:</b> The proposed additional requirements will add to the cost of development, which could impact on scheme viability. All requirements should be judged against scheme viability.	Paragraphs 21-24 address this issue, many of the measures can be incorporated at zero or minimal cost, grants are available and buildings become cheaper to run. The SPD will be a material consideration. There may be cases where specific considerations will affect its application. The SPD has been written to apply in the majority of cases. A new sentence has been added to paragraph 10 that reads: <i>“The SPD is therefore worded in general terms with advice and requirements that will apply in the majority of cases.”</i>	Sentence added to the end of paragraph 10.
General	Linden Homes	<b>Comment:</b> The standards should be more flexible, less onerous and linked to current recognised methodology criteria. There should be more flexibility to recognise viability and the delivery of housing.	The standards are based where possible on existing methodologies eg. SAP, SBEM and Watermark. The SPD will be a material consideration. There may be cases where specific considerations will affect its application. The SPD has been written to apply in the majority of cases. A new sentence has been added to paragraph 10 that reads: <i>“The SPD is therefore worded in general terms with advice and requirements that will apply in the majority of cases.”</i>	Sentence added to the end of paragraph 10.
<b>Section 1: Introduction</b>				
Para 1	Westgate Partnership / NLP	<b>Support</b>	Noted	No change to SPD

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Para 2	Westgate Partnership / NLP	<b>Support</b>	Noted	No change to SPD
Para 3	Westgate Partnership / NLP	<b>Support</b>	Noted	No change to SPD
Para 12	Westwaddy ADP	<b>Object:</b> General approach is insufficiently precise in providing information on what is required of the applicant. The phrase “where a significant number of questions have been answered ‘no’ it will be advisable to amend the proposals before submitting an application for planning permission” lacks clarity when the purpose of SPD is to provide such clarity. We suggest that the guidance be amended to link this section through to a more detailed scoring mechanism along the lines of the Eco-Homes Assessment.	It is considered that the correct balance has been struck between precision (checklist) and flexibility (template)	No change to SPD
Para 13	Westwaddy ADP	<b>Object:</b> Significant doubts about the ability of Officers both having regard to their skills and other demands on their timescale. We recommend that the paragraph is amended to indicate that the matter will be dealt with by trained staff, what their training is and that responses will always be provided within 2 weeks.	There is existing expertise within the planning department and other Council departments. For complex cases, outside advice will be used on a consultancy basis.	No change to SPD
Para 14 & 15	L. Mikhelson	<b>Comment:</b> Concern over the monitoring of commitment, the need for enforcement and the question of ‘supervision’ of compliance.	Like other requirements these will form part of the planning application and may be conditioned. Enforcement will take place as usual.	No change to SPD
Para 14	RPS Planning	<b>Objection:</b> Object to the inclusion of minimum standards at the level set within the NRIA checklist. Such requirements potentially affect the viability of delivering development in the City and meeting key planning objectives such as housing targets. The ‘Minimum Standard’ be amended to read ‘Indicative Standard’.	It is important that the SPD provided certainty and clarity of expectation. The City Council has a clear commitment to the cause and as such a minimum standard is appropriate	No change to SPD
Para 14	RPS Planning	<b>Addition:</b> add the following sentence to the end of the paragraph: ‘Proposals for new development should aim to meet the indicative standard. Consideration will be given to the feasibility and viability of achieving this based on the circumstances of each site and proposed development.’	The SPD will be a material consideration. There may be cases where specific considerations will affect its application. The SPD has been written to apply in the majority of cases. A new sentence has been added to paragraph 10 that reads: “ <i>The SPD is therefore worded in general terms with advice and requirements that will apply in the majority of cases.</i> ”	Sentence added to the end of paragraph 10.
Para 14	Westwaddy ADP	<b>Object:</b> Reviewing the standards in 2010 is too rigid. The AMR will examine the success of these policies, it may be necessary to review the detailed implementation earlier than 2010. We suggest the wording to be amended to “It is the City Council’s intention to review the NRIA every year in the AMR”.	Local Plan policies are monitored annually in the AMR. The content of the SPD cannot however be revised through the AMR, only through following the 1 year procedure for SPD production. The 2010 date is given as an	No change to SPD

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			indication to the intention to revise the standards in the future is appropriate.	
Para 15	Westwaddy ADP	<b>Object:</b> The special circumstances of Oxford that justify a different approach to the Eco-Homes not acceptable. We note that the SPD invites the submission of Eco-Homes or Code for Sustainable Buildings (sic) alongside the NRIA, but in order to avoid unnecessary duplication and waste of paper the document should be amended to allow the submission of a completed assessment of one of the other systems at one of the top two grades instead of the Council's own checklist.	The NRIA provides a specific focus based on the priorities of the City Council and Local Plan policy. If an applicant wishes to progress with an alternative system, this should be done alongside the NRIA.	No change to SPD
Para 16	Westwaddy ADP	<b>Object:</b> A laudable objective, but not what appears to be delivered as noted in the response to paragraph 12.	The intention is clear throughout the text and the requirements are made clear through the checklist.	No change to SPD
Para 17	C/o 4 Percy Street	<b>Comment:</b> Will it possible to enforce a sliding scale of compliance for developments of less than 10 dwellings or 2,000m <sup>2</sup> ? Perhaps a 9 dwelling development could be required to be 90% compliant. Alternatively, the NRIA could apply to all developments.	The figures of 10 or more dwellings and 2,000 m <sup>2</sup> are set in the Local Plan policy and cannot be amended by the SPD. The City Council would encourage all developers to integrate the principle of resource efficient buildings into their developments.	No change to SPD
Para 18	Westwaddy ADP	<b>Object:</b> It is not clear how the requirement that "all developments must be designed to optimise energy efficiency" will be assessed. The key word is "optimise". We are concerned that Council Officers are interpreting this as "maximise". We suggest that the text of the SPD is amended to state "In this context optimise means effective use of energy efficiency techniques having regard to site characteristics and feasibility and Part L of the Building Regulations (2006)."	Paragraph 18 is clear in quoting Local Plan policy, the word "optimise" is used and is considered appropriate.	No change to SPD
Para 19	Westwaddy ADP	<b>Object:</b> 'We have significant concerns about the justification for and practicalities of providing an NRIA to support an outline planning application. When applicants are not the developers and will not be able to provide the level of detail requested for an NRIA. In such circumstances it is appropriate to require the submission of an NRIA at the reserved matters stage and the SPD should be amended to reflect this.'	It is acknowledged in the text that many of the details will not be available at outline stage. The level of detail will depend on the application. It is important however that NRIA principles are considered right from the outset and a commitment is made through planning conditions or legal agreements.	No change to SPD
Para 23	Westgate Partnership / NLP	<b>Object:</b> Stating that renewable energy sources can be procured for a relatively small proportion of the total build costs may be true but is not necessary or appropriate in a policy.	It is considered important to address this point in the SPD as it is a concern raised by a number of respondents at the issues stage.	No change to SPD
Section 2: Energy Efficiency				

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Para 25	Westgate Partnership / NLP	<b>Object:</b> Approximately 20% of that energy is thought to be wasted. It is difficult to confirm that figure. The average completed building stock lags behind latest technology, so we envisage that this sort of number will never dissipate.	This figure was taken from a publication by DTI, BRE and CIBSE "Draft Guidance on Incorporation of Renewables in Buildings". It is considered to be helpful in setting the context for this section.	No change to SPD
Para 28	Westgate Partnership / NLP	<b>Object:</b> 'solar gains' do not provide a contribution towards lighting and ventilation, but only a positive contribution for heating and a negative contribution for cooling.'	Noted, change first sentence to read: " <i>Solar gain can provide a significant contribution towards the heating, lighting (daylighting can offset the requirements for electric lighting) and ventilation (via passive stack ventilation) in a building. Solar gain should be controlled so as to avoid excessive demand for cooling.</i> "	Changed proposed to first sentence of paragraph 28.
Para 28	Westgate Partnership / NLP	<b>Object:</b> A specific orientation should not be specified. Low-energy design and the choice of orientation, percentage of glazing, shading, etc. should be made on a building-by-building basis.	It was not intended to specify an orientation, merely to explain a principle. A change is proposed to make this clearer. Change 3 <sup>rd</sup> sentence to read: " <i>...depending on the size and use of buildings, but elevations that face within 30° of due south (either to the east to maximise morning sunlight or to the west to maximise afternoon sunlight) are likely to maximise access to the sun (excluding other factors).</i> "	Change proposed to third sentence of paragraph 28.
Para 29	Westgate Partnership / NLP	<b>Object:</b> shading is beneficial in the summer months throughout the day, but particularly on the south to west elevations, and not ' <i>particularly at the start and end of the day</i> '.	Noted, add to the end of the first sentence: " <i>and on the south and west elevations.</i> "	Change proposed to 1 <sup>st</sup> sentence of para. 29.
Para 29	Westgate Partnership / NLP	<b>Object:</b> Daylight penetration is very much dependent on the glazing size and type and on the adjacent building rather than on the orientation.	The impact of glazing and adjacent buildings is made clear in both paragraphs 28 and 29.	No change to SPD.
Para 29	Westgate Partnership / NLP	<b>Support:</b> The two boxes on the differences between residential and commercial 'use' of passive solar gains are very useful for the designers.	Noted.	No change to SPD.
Para 33	Westwaddy ADP	<b>Comment:</b> Reference could usefully be made to vacuum insulation, which is more space efficient – an important consideration in commercial buildings.'	Noted, add a sentence after sentence 6 to read: " <i>Other innovative insulation measures and technologies (such as vacuum insulation) are also becoming available.</i> "	Change proposed to paragraph 33.
Para 35	Westgate Partnership / NLP	<b>Object:</b> Heating and lighting systems should only be mechanised where absolutely necessary'. It is a challenging target to reduce reliance on heating and lighting systems, suppressing these systems is unrealistic at the moment. Besides, mechanical ventilation could be sometimes more appropriate (and energy efficient) than natural ventilation.	Noted, deleted the word " <i>absolutely</i> " from the third sentence of paragraph 35.	Change proposed to 3 <sup>rd</sup> sentence of para .35.

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Para 36	Westgate Partnership / NLP	<b>Object:</b> The policy should read 'install energy-efficient boilers' rather than explaining how condensing boilers work.	Paragraph 36 isn't a policy but explanatory text; it is appropriate to explain how such a system works.	No change to SPD.
Para 37	Westgate Partnership / NLP	<b>Object:</b> 'and over the year' should be added to the sentence: 'CHP is most cost-effective when the demand over the day'.	Noted, add new sentence after sentence four: "CHP is also most cost effective when the demand is balanced over the seasons of the year."	Change proposed to para. 37.
Para 37	Westgate Partnership / NLP	<b>Object:</b> 'Transmission distances should be kept short: CHP is most efficient when users are located close to the power source'. Transmission losses of the CHP are not that critical and we think that sentence should be deleted.	Noted, delete the words: "Transmission distances should be kept short;" from the start of sentence six.	Change proposed to para. 37
Para 37	Westgate Partnership / NLP	<b>Object:</b> CHP is not necessarily well suited to offices, factories, data centres and shopping centres.	Change the text of the commercial box to read: "CHP units can also be well suited..."	Change proposed.
Para 38	Westgate Partnership / NLP	<b>Object:</b> We think the policy should read 'maximise the use of natural ventilation'. Rules of thumb regarding cross ventilation and single sided ventilation could have a detrimental effect as people might think that if these rules do not strictly apply to their project, then mechanical ventilation is inevitable.	Noted, add the words: "As a general guideline,.. " to the start of the fifth sentence of paragraph 38.	Change proposed to 5 <sup>th</sup> sentence of para. 38
Para 38	Westgate Partnership / NLP	<b>Object:</b> Mechanical ventilation should not necessarily supplement natural ventilation. There might be cases (e.g. flats on a noisy elevation) where mechanical ventilation is the most appropriate answer.	Paragraph 38 states the general approach that should be taken, there may be exceptions but the general approach is the key.	No change to SPD.
Para 38	Town Furze Allotments	<b>Comment:</b> Displacement ventilation is unsuitable for family accommodation where small children may crawl/play on the floor and older siblings sit on the floor e.g. to watch T.V.	Noted, however the text does not propose this.	No change to SPD.
Para 38	C/o 4 Percy Street	<b>Objection:</b> No mention is made of the use of heat exchangers in both passive and assisted ventilation systems. This technology is well developed and should be included.	Noted, Add sentence to paragraph 38 to read: "Heat Exchange technology can be used in both passive and mechanical ventilation systems to increase efficiency."	Change proposed to paragraph 38.
Para 39	Westgate Partnership / NLP	<b>Object:</b> Daylight penetration is very much dependent on the glazing size and type and on the adjacent buildings rather than on the orientation.	This is made clear in the second sentence of paragraph 39.	No change to SPD.
Para 39	Westwaddy ADP	<b>Comment:</b> Reference could be made to the ability of Sun pipes to introduce light into areas that would otherwise require artificial lighting.	Sun pipes are discussed in the text box following paragraph 39.	No change to SPD.
<b>Section 3: Renewable Energy</b>				
Section	Town Furze Allotments	<b>Suggestion:</b> Oxford City Council could use Shotover for Coppicing – Woodpellets as used by Didcot Power Station. This could help Oxford reach its electricity generation target and would also return the woodland to its proper management.	Suggestion noted, this does not request a change to the SPD.	No change to SPD.

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Section	Oxford University Estates Department	<b>Object:</b> Practically all the current means of power generation from renewable sources are economically unviable, costs outweigh those recoverable during the lifetime of the equipment. Solar panels have lives of only 10 – 25 years and photovoltaics of under 20 years.	Research has shown that micro-generation technologies can be viable. The government position is clearly to encourage the take-up of such technologies (See paragraph 43) and the Minister for Housing and Planning's speech (8 <sup>th</sup> June 2006): " <i>Such policies (on-site renewables) have a vital role to play in reducing emissions, through the use of carbon-neutral energy sources.</i> "	No change to SPD.
Section	Oxford University Estates Department	<b>Object:</b> There is too much emphasis on current "fashionable" mini power generation methods and not enough on reducing the amount of energy we use.	The section on energy efficiency is deliberately placed before that on renewable energy for this reason. The government position is clearly to encourage the take-up of such technologies (See paragraph 43) and the Minister for Housing and Planning's speech (8 <sup>th</sup> June 2006): " <i>Such policies (on-site renewables) have a vital role to play in reducing emissions, through the use of carbon-neutral energy sources.</i> "	No change to SPD.
Para 40	Westgate Partnership / NLP	<b>Object:</b> Instead of '37% of UK carbon emissions originate from energy production'. It is probably more appropriate to say that 'Half of UK carbon emissions are due to energy used in buildings.'	Noted, delete the second sentence from paragraph 40. The suggested text is already included at paragraph 25, where it is considered to be more appropriate.	Change proposed to paragraph 40.
Para 40	Westgate Partnership / NLP	<b>Object:</b> By using energy from renewable energy sources, reductions can be made in the demand for electricity generated in traditional non-renewable ways'. Renewable energy sources help to reduce the demand for energy (i.e. electricity and heat – not electricity only) and thus the demand for fossil fuels (i.e. coal, gas, oil, etc.). This paragraph should be modified in order to avoid confusion.	Noted, change the word " <i>electricity</i> " in the second sentence of paragraph 40 to read " <i>energy</i> ".	Change proposed to the second sentence of paragraph 40.
Para 41	Westgate Partnership / NLP	<b>Object:</b> There appears to be some confusion here. The government targets are CO <sup>2</sup> emissions reduction by 60% by 2050 and the generation of 10% of UK electricity from renewable energy sources by 2010 and 20% by 2020.	Noted, change the word " <i>energy</i> " in the first sentence of paragraph 41 so it reads: "...20% of UK electricity...".	Change proposed to 1 <sup>st</sup> sentence of para 41.
Para 42	Westgate Partnership / NLP	<b>Object:</b> OCC will encourage development of renewable technologies on appropriate sites...'. Defining what an appropriate site' it would be useful to provide greater clarity.	What would be classed as an appropriate site would differ depending on the technology and building proposed. This paragraph simply states the policy approach and is considered to be appropriate.	No change to SPD.

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Para 42	Westwaddy ADP	<p><b>Object:</b> The draft SPD indicates in Appendix 6 and 7 that the minimum standard for on-site renewables will be 20%. This is unrealistic and not supported by Policy CP.18. The policy does not specify such a minimum level of on site renewables and such a specific figure would be unrealistically precise and inflexible – something that the Local Plan Inquiry Inspector said that the policy would not happen at para 2.25.9 of his report. It is likely for example that refurbishment of City Centre or listed buildings will not be able to meet this criterion.</p> <p>In addition, the use of renewable sources of energy impose additional management costs on Housing Associations, such that they are likely to be resistant to renewable sources of energy being associated with the social housing element of the stock, the entire burden is therefore likely to fall on the private market element.</p>	<p>The SPD provides clarity and advice on the expectations of the City Council in this area and will form a material consideration. A letter sent by the DCLG to all planning authorities (14.6.06) read: <i>“I am asked to urge your authority to follow the lead of some authorities (10% of energy from on-site renewable sources) and consider, where feasible, setting a higher, more challenging, percentage”</i>. Specialist advice has been taken on the setting of the 20% figure and it has been considered appropriate for the majority of cases.</p> <p>With regards to Housing Associations, the incorporation of renewable energy technologies can also have significant benefits in terms of reducing the incidence of fuel poverty.</p>	No change to SPD.
Para 43	RPS Planning	<p><b>Objection:</b> Consider that the requirement to achieve 20% on-site provision of renewable energy as an initial standard is excessively high and should be reduced to 10%. Again this will affect the viability of delivering development. Furthermore, it is not always possible to provide renewable energy on site, particularly on smaller sites.</p>	<p>A letter from the DCLG to planning authorities (14.6.06) reads: <i>“I am asked to urge your authority to follow the lead of some authorities (10% of energy from on-site renewable sources) and consider, where feasible, setting a higher, more challenging, percentage”</i>. Specialist advice has been taken on the setting of the 20% figure and it has been considered appropriate for the majority of cases.</p>	No change to SPD.
Para 45	Westgate Partnership / NLP	<p><b>Object:</b> The following sentence should be deleted <i>‘often computer-controlled and requiring little manual input and management’</i>. This is not true on most of the current systems.</p>	<p>Noted, delete the words: <i>“often computer controlled”</i> from the seventh sentence.</p>	Change proposed to para. 45.
Para 45	Westgate Partnership / NLP	<p><b>Object:</b> The fact that wood chips are more suited to certain heat loads and pellets to others is contestable and should not be expressed in that policy.</p>	<p>Noted delete the ninth and tenth sentences of paragraph 45.</p>	Change proposed to para. 45.

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Para 45	Westgate Partnership / NLP	<b>Object:</b> CHP sizing and costs of wood pellets should not be dealt with in this document as it could change in the near future.	Noted, delete the words: “as CHP is un-feasible unless base loads of 150kW heat and 100kW electricity (minimum) are required” from the eleventh sentence and reword the twelfth sentence to read: “Fuel supply is plentiful and not a problem regionally, with prices rapidly converging with the cost of gas. It is anticipated that chips and pellets will become cheaper than gas in the near future”.	Change proposed to paragraph 45.
Para 46	Westgate Partnership / NLP	<b>Object:</b> It would be preferable to replace ‘Heat pumps are maintenance free’ by ‘Heat pumps require little maintenance’.	This sentence currently reads: “...can be maintenance free...”. It is considered that this is appropriate.	No change to SPD.
Para 46	Westgate Partnership / NLP	<b>Object:</b> Getting into how the heat pump works is not useful in this document and could lead to mistakes (e.g. closed loop systems do exploit the stable temperature of the ground but open-loop systems do not: they exploit the stable temperature of the aquifer.	Noted, Delete sentences 7 – 11 of paragraph 46	Change proposed to paragraph 46.
Para 47	Westgate Partnership / NLP	<b>Object:</b> Suggest that discussion about the relative efficiencies of flat plate and evacuated tube collectors should not be included.	It is considered that this is useful as background information.	No change to SPD.
Para 47	Westgate Partnership / NLP	<b>Object:</b> The optimum orientation is south, not slightly west of due south.	Noted, amend sentence six to read: “The best location is facing towards the south and at a tilt of 30 - 40°, although a collector set anywhere between east and west and at a tilt of between 10 and 60° will perform at 90% of the optimum performance.”	Change proposed to paragraph 47.
Para 48	Westgate Partnership / NLP	<b>Object:</b> PVs would be very bad at providing back-up. They are performing best when they provide a constant base requirement, not a peak and very occasional requirement for electricity.	Noted, delete the fifth sentence of paragraph 48.	Change proposed to para. 48.
Para 50	BHA British Hydropower Association	<b>Object:</b> There is no hard and fast rule about head and less than 1.5m can be difficult to justify but the economics for hydro developments are slowly improving with the rise in electricity prices and for some developers projects below 1.5m might be worthwhile.	Noted, delete the words: “...which needs to be a minimum of 1.5m” from the second sentence.	Change proposed to paragraph 50.
<b>Section 4: Choice of Materials and Embodied Energy</b>				
No responses were made to this section.				
<b>Section 5: Recycled Materials</b>				
Section 5	Town Furze Allotments	<b>Addition:</b> Please explain mechanisms for monitoring and enforcement, e.g. How do you check a developer has in fact re-cycled building materials? (as he will claim)	Like other requirements these will form part of the planning application and will be conditioned. Enforcement will take place as usual.	No change to SPD.

Section	Objector	Summary of representation	Officer response	Officer recommendation
Section 5	Oxfordshire County Council	<b>Support:</b> The inclusion of the sections covering management of construction and demolition waste and recycling/reuse of building materials is welcomed.	Noted.	No change to SPD.
Para 65	Oxfordshire County Council	<b>Support:</b> Support the encouragement of provision of space for waste in new development prior to recycling or composting. As highlighted in the boxes on residential and commercial recycling.	Noted.	No change to SPD.
<b>Section 6: Water Resources</b>				
Section 6	Thames Water	<b>Support:</b> Thames Water supports the water resources objectives within the NRIA SPD.	Noted.	No change to SPD.
Section 6	Thames Water	<b>Addition:</b> expand this section to include reference to water and wastewater infrastructure capacity.	Paragraph 6 is clear that there are many other aspects of sustainability that could be included in the SPD but that the decision has been taken to focus on policies CP.15-18. The issue of water and sewage infrastructure is addressed elsewhere in the Local Plan at Policy NE.14.	No change to SPD.
<b>Appendices</b>				
App 2	Oxfordshire County Council	<b>Addition:</b> The SPD could include reference to the household and commercial waste reduction packs available from the County Council as sources of further information about waste minimisation and recycling.	Noted, add the County Council website to the list of sources of further information to Section 5 in Appendix 2.	Change proposed to App. 2.
Template (App 6)	Hoare LEA	<b>Object:</b> The questioning contained within the NRIA template all appears reasonable and well directed, however, it is not clear from the SPD how the responses to questioning within the NRIA template are assessed and what weighting this section would have, if any, upon the overall accreditation of the proposed development. The NRIA template appears only to be judged by how many “no’s” are provided.	The template will be used to help a developer to think about these issues and to give an overall picture of the proposed development in resource efficiency terms. There is no formal scoring system so that there is flexibility in enabling a variety of approaches can be taken. It is not the number of “nos” that is important, hence the sentence at the start: “...supplying as much detail as is available to support that answer”. The questions have also been reworded to avoid yes/no answers being given. Its completion will give an opportunity to explain the schemes credentials.	No change to SPD.
Template (App 6)	Westgate Partnership / NLP	<b>Object:</b> As above	As above	No change to SPD.

Section	Objector	Summary of representation	Officer response	Officer recommendation
Template (App 6)	Hoare LEA	<b>Object:</b> Should the overall assessment be judged only by the NRIA checklist scoring, it appears quite possible that good practice design and operational initiatives being employed, identified within the NRIA template, would go unrecognised in the overall assessment of sustainable integrity. Directly unrecognised: formulation of an energy strategy; controlled natural ventilation; biodiversity; thermal mass; maximisation of day lighting; waste management; recycling. Indirectly recognised: energy efficiency; materials selection; insulation standards; solar shading/beneficial solar gain.	The template will form an integral part of the NRIA submission as set out in the introduction. The template provides developers with the opportunity to highlight specific elements of their design including those set out in the objection.	No change to SPD.
Template (App 6)	Westgate Partnership / NLP	<b>Object:</b> As above	As above	No change to SPD.
Template (App 6)	C/o 4 Percy Street	<b>Comment:</b> Will planning permission be automatically refused for any development failing to achieve a score of 6 or more on the NRIA checklist? We think that it ought to be refused.	Under Section 38(6) of the Planning And Compulsory Purchase Act...	No change to SPD.
Template (App 6)	C/o 4 Percy Street	<b>Comment:</b> How will total energy consumption be arrived at? How will the amount provided by renewables be estimated? These have a direct influence on the percentage produced by on-site renewables. One authoritative source of data must be cited.	Total energy consumption will be derived from the national calculation methods of SAP for residential and SBEM for non-residential. The productivity of renewables will be derived from the manufacturers data.	No change to SPD.
Template (App 6)	C/o 4 Percy Street	<b>Comment:</b> Suggest that an effective mechanism should be in place to measure the post-development performance against the NRIA.	Where appropriate the City Council will use conditions and / or legal agreements to secure the commitments made in an NRIA as described in paragraph 16. Enforcement will take place as usual.	No change to SPD.
Template (App 6)	HBF	<b>Object:</b> Concern over how the checklist will be implemented. Developers are required to complete a checklist answering 37 questions without any indication being given as to how the answers to those questions will be used in determining whether or not a development proposal complies with the local plan. Or in more extreme cases whether or not a planning application will be validated for processing. While the objectives of achieving sustainable development are clear, how developers comply with those objectives, or more importantly how the local authority will determine whether or not those objectives, have been complied with, are absolutely uncertain as a result of these proposals.	The template gives a clear indication of the intentions of the City Council in this area. It will enable Development Control officers to assess how schemes are addressing these important issues. The final section of the template, the checklist, provides a clear, measurable test of compliance.	No change to SPD.
Template (App 6)	Thames Water	<b>Addition:</b> add a question to the template that reads: "Does the proposal ensure that adequate sustainable water resources and wastewater treatment can be provided to support the development?"	Paragraph 6 is clear that there are many other aspects of sustainability that could be included in the SPD but that the decision has been taken to focus on policies CP.15-18. The issue of water and sewage infrastructure is addressed elsewhere in the Local Plan at Policy NE.14.	No change to SPD.

Section	Objector	Summary of representation	Officer response	Officer recommendation
Checklist (App 7)	HBF	<p><b>Object:</b> The questions posed bear no relationship to the objectives and are worded in so vague a manner as to be meaningless. "Has the development been designed to maximise controlled natural ventilation?" Is a simple yes/no answer expected to that question. What about "Will materials be sourced locally?" How can that be answered simply yes or no (or partially) when it is likely that some materials may be but others not sourced locally. What weight is given to a "yes" answer as opposed to a "no" answer. How are the explanations weighted when a "no" answer is given, as a "no" answer may be completely justified and appropriate in respect of some questions on some developments.</p> <p>While the principle of the NRIA concept may well be a sound one, the process for its implementation set out in this draft SPD is completely unworkable and totally unsound (Tests of Soundness vi, vii, viii, and ix set out at paragraph 4.24 of PPS12 apply).</p>	<p>The sentence above the template reads: "...supplying as much details as is available to support that answer". The questions have been reworded to avoid yes/no answers being given. The questions are intended to structure the analysis as is made clear in paragraph 12. A "no" answer that is supported by a full and reasonable justification will not be viewed as a straight "fail".</p> <p>It is not accepted that the tests of soundness have been failed.</p>	No change to SPD.
Checklist C1 (App 7)	Hoare LEA	<p><b>Comment:</b> SAP ratings used are from SAP 2001 rather than SAP 2006. The table used is from the SAP 2001 scale and uses the Energy Saving Trust Document CE12 as a reference. On this scale, 92-101 is normally the minimum score to pass Building Regulations, a score of '1' is awarded for a SAP score of 100 to 102, and this is usually easily achieved for a new-build development. A score of '2' is awarded for a SAP score of 106-108. This is commercially achievable, and equates roughly to an Eco Homes Very Good benchmark at some cost and minor design restraint. A score '3' is awarded for a SAP score of 124 to 128. This achievable for new homes with limited glazing area and, say, solar hot water collectors. We note that Table 1 "Advanced" score 3 is more challenging than EST CE12 "Advanced".</p>	<p>The Energy Saving Trust is currently reviewing their document, CE12, on which the SAP table is based. If the revision is published before the SPD is finally adopted, a new table will be substituted.</p>	Possible change to SPD.
Checklist C1 (App 7)	Westgate Partnership / NLP	<p><b>Comment:</b> As above</p>	As above.	As above.
Checklist C1 (App 7)	Hoare LEA	<p><b>Comment:</b> This part of the table is not yet complete, and there is still doubt over the validity of the benchmarks used in this method across the full range of building types. An appropriate set of benchmarks might be: Improvement on minimum SBEM score, One point 5%, Two points 10%, Three points 15%.</p>	<p>A similar set of benchmarks has been used for the non-residential energy efficiency measure.</p>	Updated Checklist Q1.
Checklist C1 (App 7)	Westgate Partnership / NLP	<p><b>Comment:</b> As above</p>	As above.	As above.

Section	Objector	Summary of representation	Officer response	Officer recommendation
Checklist C2 (App 7)	Hoare LEA	<b>Objection:</b> Whilst considered feasible to meet, if not exceed, the minimum target percentage of energy produced by on site renewables, with certain sizes and types of development; for certain developments it is considered onerous if stipulated as a particular requirement. Such developments might include: high-rise; refurbishment; energy intensive buildings, such as: acute healthcare, leisure centres, call centres, data centres, manufacturing, most retail, full facility hotels; capital limited schemes, marginal returns, social clubs; large schemes. It would be sensible to apply a test of economic performance, practicality or offset to enhanced energy efficiency for such developments.	It is agreed that it is possible to meet or exceed the renewable energy standards. The NRIA has been written to apply in the majority of cases, where specific uses and schemes find it difficult to apply the standards, this should be justified in the NRIA submission and will be considered as such.	No change to SPD.
Checklist C2 (App 7)	Westgate Partnership / NLP	<b>Objection:</b> As above.	As above.	As above.
Checklist C2 (App 7)	Westgate Partnership / NLP	<b>Objection:</b> The targets are aspirational – in some situations they will be achievable; others not. Many larger urban developments with total renewable targets in excess of 1MW would struggle to meet such a target by renewables alone. Table provided with proposals for Westgate as an example.	A letter from the DCLG to planning authorities (14.6.06) reads: <i>“I am asked to urge your authority to follow the lead of some authorities (10% of energy from on-site renewable sources) and consider, where feasible, setting a higher, more challenging, percentage”</i> . Specialist advice has been taken on the setting of the 20% figure and it has been considered appropriate for the majority of cases. The definition of the requirement has been widened to include low-carbon energy production in line the with government approach. See text added at paragraph 43.	No change to SPD.
Checklist C2 (App 7)	Westgate Partnership / NLP	<b>Comment:</b> The associated impacts of some renewable initiatives should also be considered over and above the pure ‘renewable contribution’. (see table on objection)	Paragraph 10 makes it clear that not all measures are appropriate in all circumstances but that <i>“...there will always be a need to balance the benefits of these measures against the wider design policies of the Local Plan”</i> for example.	No change to SPD.

Section	Objector	Summary of representation	Officer response	Officer recommendation
Checklist C2 (App 7)	RPS Planning	<b>Objection:</b> Consider that the requirement to achieve 20% on-site provision of renewable energy as an initial standard is excessively high and should be reduced to 10%. It will affect the viability of delivering development and it is not always possible to provide renewable energy on site, particularly on smaller sites.	A letter from the DCLG to planning authorities (14.6.06) reads: <i>"I am asked to urge your authority to follow the lead of some authorities (10% of energy from on-site renewable sources) and consider, where feasible, setting a higher, more challenging, percentage"</i> . Specialist advice has been taken on the setting of the 20% figure and it has been considered appropriate for the majority of cases.	No change to SPD.
Checklist C2 (App 7)	Hoare LEA	<b>Objection:</b> Consider that a fixed percentage for renewable energy provision is unreasonable since it may force the application of financially and environmentally incorrect technologies. The appendix 7 schedule might perform better if the percentage renewables be scaled to suit a number of project specific criteria which might include: development type; development location; development size	A statement by the Minister for Housing and Planning (8.6.06) reads: <i>"...the Government expect all planning authorities to include policies in their development plans that require a percentage of the energy in new developments to come from on-site renewables, where it is viable"</i> . It is therefore considered that the approach taken is appropriate.	No change to SPD.
Checklist C2 (App 7)	Westgate Partnership / NLP	<b>Objection:</b> As above.	As above.	As above.
Checklist C2 (App 7)	Hoare LEA	<b>Comment:</b> It should be recognised that even where a developer whole heartedly embraces a particular renewable technology and accommodates that technology to capacity on the site, the 20% minimum requirement may still not be achieved. The fixed percentage requirement might appear unreasonable where a developer has made best efforts to incorporate viable renewables.	A statement by the Minister for Housing and Planning (8.6.06) reads: <i>"...the Government expect all planning authorities to include policies in their development plans that require a percentage of the energy in new developments to come from on-site renewables, where it is viable"</i> . It is therefore considered that the approach taken is appropriate. The SPD is worded in general terms that will apply in the majority of cases.	No change to SPD.
Checklist C2 (App 7)	Westgate Partnership / NLP	<b>Comment:</b> As above.	As above.	As above.

Section	Objector	Summary of representation	Officer response	Officer recommendation
Checklist C2 (App 7)	Linden Homes	<b>Comment:</b> 20% on-site renewables will present practical difficulties, particularly for smaller residential sites.	A letter from the DCLG to planning authorities (14.6.06) reads: <i>"I am asked to urge your authority to follow the lead of some authorities (10% of energy from on-site renewable sources) and consider, where feasible, setting a higher, more challenging, percentage"</i> . Specialist advice has been taken on the setting of the 20% figure and it has been considered appropriate in the majority of cases.	As above.
Checklist (App 7)	Linden Homes	<b>Comment:</b> The scoring methodology is inflexible, allows little site-specific consideration and appears to be particularly onerous.	The scoring aspect of the checklist is intended to supplement the details provided in the template section of an NRIA. It was not considered appropriate to score the whole checklist as not all measures will be appropriate in all circumstances but that the 4 key questions of the checklist are widely applicable.	No change to SPD.
Checklist C2 (App 7)	Hoare LEA	<b>Comment:</b> For large scale developments to fully meet this renewable requirement it might be considered more appropriate to connect to a centrally managed energy centre affording district mains for hot water and electricity, particularly those in urban areas. In such instances, it might be more appropriate for OCC to commit future developers to making provision for future connections to a district heating network initiative as opposed to setting high individual targets, with the associated high commercial and operational risks.	Connection to a centrally managed energy centre may well prove to be the appropriate solution for some developments. Text has been added to paragraph 43 which make this possibility more explicit: "As an illustration, in some circumstances district heating may be available and may be the best choice of technology for generating energy for a scheme. In such cases this will be taken into account as if it were produced from an on-site renewable energy source. This would require a planning / legal commitment to ensure that the development was connected to the system in the long term."	Text added to para. 43.
Checklist C2 (App 7)	Westgate Partnership / NLP	<b>Comment:</b> As above.	As above.	As above.
Checklist C3 (App 7)	Hoare LEA	<b>Comment:</b> Score 1: is easily achieved from a series of simple specification measures. Score 2: is achieved if aggregates are mainly from recycled sources or from products of demolition. Score 3: could not normally be achieved for commercial buildings.	Noted, this response appears to confirm that the standards are set at the appropriate levels.	No change to SPD.

Section	Objector	Summary of representation	Officer response	Officer recommendation
Checklist C3 (App 7)	Westgate Partnership / NLP	<b>Comment:</b> As above.	As above.	No change to SPD.
Checklist C4 (App 7)	Hoare LEA	<b>Comment:</b> The scoring mechanism is mainly directed at residential schemes. A scoring method for commercial buildings would be required. Score 1: is achievable at reasonable cost. Score 2: simply requires care in selecting appliances and flow regulators. Score 3: requires a full application of low water use wc's, showers, baths, taps and appliances. Not normally achieved for market dwellings, but can be achieved in social/student dwellings.	The checklist question on water resources has been amended to address a broader range of uses.	Changes made to water resources checklist question.
Checklist C4 (App 7)	Westgate Partnership / NLP	<b>Comment:</b> As above.	As above.	As above.
Checklist (App 7)	Oxford Architects	<b>Objection:</b> Appendix 7 concentrates and scores a limited range of sustainable areas and ignores basic but very important design areas. Our concern is, that some sites will throw up 'failed' scores and lead to a recommendation for 'refusal'. We wish to see some of the broader aspects of the NRIA checklist included in the scoring system.	The template will form an important, integral part of an NRIA submission. This covers a wide range of issues and measures. It was not considered appropriate to score the whole checklist as not all measures will be appropriate in all circumstances. Instead the checklist aspect is used to supplement the details provided in the template section.	No change to SPD.
Checklist (App 7)	Oxford Architects	<b>Objection:</b> Concerned that in its present state the scoring system will need 'technical' skills to assess and in-conjunction with the checklist that may not be available on a reasonable time scale to the department.	There is existing expertise both within the planning department and elsewhere in the Council, for more complex cases we have arranged to use outside advice.	No change to SPD.
Checklist (App 7)	Oxford Architects	<b>Comment:</b> In its present form we believe that the NRIA could lead to a number of early appeals to 'test' whether it is being applied by Officers in a 'reasonable' way as it goes well beyond the requirements of the current legislation in the 'Building Regulations'. We would wish to avoid this situation arising.	Noted. The Local Plan Policies that have been tested at the Local Plan Inquiry deliberately go beyond the requirements of the building regulatory system.	No change to SPD.

Section	Objector	Summary of representation	Officer response	Officer recommendation
Checklist C2 (App 7)	Peacock & Smith	<p><b>Objection:</b> It is considered that the percentage of energy requirements set out under the checklist are unduly onerous and should be omitted. The requirement to generate on-site renewable energy should only be applied to developments where the installation of renewable energy generation equipment is viable given the type of development proposed, its location, and design. It is considered that each assessment should be made on a case-by-case basis in line with guidance set out in PPS22.</p>	<p>A statement by the Minister for Housing and Planning (8.6.06) read: "...the Government expect all planning authorities to include policies in their development plans that require a percentage of the energy in new developments to come from on-site renewables, where it is viable". In the accompanying letter from the DCLG to planning authorities (14.6.06): "I am asked to urge your authority to follow the lead of some authorities (10% of energy from on-site renewable sources) and consider, where feasible, setting a higher, more challenging, percentage". Specialist advice has been taken on the setting of the 20% figure and it has been considered appropriate.</p>	No change to SPD.
Response no comment				
	Highways Agency	We do not wish to make any comments at this time	Noted.	No change to SPD.