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Subject:

Dear sir

I have the following comments on Chapter 9, "Sustainable Infrastructure"

1. How do the requirements of the draft Plan, with its requirement to drive towards a zero-carbon city, take due cognisance of the recent decarbonisation of the national electricity grid (and, indeed its expected further decarbonisation)? How can developers reflect this properly without penalty?

2. At policy S12, it is noted that "...Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided..through off-site provided that an alternative proposal is identified and delivery is certain". How is it proposed to police this policy, and what level of evidence will be deemed acceptable in order to satisfy the condition of "off-site" having been met?

3. At clause 9.4.4, an onerous penalty appears to be proposed with respect to any airconditioning system. The clause calls for airconditioning systems to reuse waste heat, and suggests that "future district heating networks are expected to be supplied with heat from waste heat sources such as building cooling systems". This all seems a somewhat idealised and fanciful notion - what technologies are expected to be employed to cost-effectively solve the notoriously difficult engineering problem of usefully harnessing low grade heat, such as the very low temperature waste heat streams from airconditioning?

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