

Matter 8: Sustainability, environment and design (subject matter of JCS policies 1, 2 and 3)Policy 1

Question B: *Is the concept of green infrastructure adequately explained and integrated into the JCS? Does policy 1 provide an effective, sharply focuses strategic brief on the purpose and deliverability of green infrastructure? Does it adequately specify the need for identified future DPDs to define the specific boundaries of strategic green corridors and include policies for the management of green infrastructure?*

1. As set out in previous representations, the TFT recognises the importance of a green infrastructure in providing significant social and environmental benefits to existing and future communities. The core strategy is a high level document and policy 1 requires development to contribute to the providing a multi-functional green infrastructure network and to help make the provision for the long term maintenance of the green infrastructure network. The TFT supports this approach and it is expected that more detail on the provision of green infrastructure will form part of master planning exercises that form part of the development of the forthcoming AAP on the Growth Triangle and as further work is done on individual sites.
2. The TFT consider that through effective master planning, it is possible to ensure the creation of a high quality landscape within the Growth Triangle as an attractive and fundamental part of the development of new communities. To this end, the TFT carried out a master planning exercise as a Charette in July 2010. This demonstrated that green infrastructure can be incorporated with and complement the growth of circa 700-800 new homes. Part of the land owned by the TFT is designated as a County Wildlife Site. However, in their responses to Matter 3b the GNDP recognise that there are requirements that will need to be satisfied with regards to ensuring the protection and enhancement of areas of ecological value but that this can be done alongside the sustainable growth and through the provision of appropriate and attractive green infrastructure. Through master planning and as more detailed work comes forward on individual sites, it is anticipated that areas will be identified for the protection and enhancement of green infrastructure. These will be defined to meet a range of objectives which could include space for both active and passive recreation, education, social interaction, health and well-being as well as local food and fuel production and sustainable urban drainage systems.
3. The TFT also acknowledges the need to create a viable, long-term management regime for green infrastructure and that it is critical that proposals for the green infrastructure are fully tested both from a capital and revenue perspective. This is to make sure that a long-term management regime can be put in place to ensure the continued maintenance and quality of the green infrastructure provided in the growth area.
4. JCS goes as far as is required to establish a set of principles for the creation of a multi-functional, viable green infrastructure provision. It will be the function of work to be carried out as part of the AAP and through individual site-master planning exercises to produced detailed spatial proposals. These will be linked to a management and delivery regime and as such will ensure viability. The TFT is exploring the potential of a Community Asset Trust structure as a means of delivery of the green infrastructure provision.

Policy 3

Question F: *Is this justified, soundly-based, effective and consistent with national policy? In particular:*

Question F1 [bullet 1]: *Is it a reasonable planning requirement to link a development permanently into a particular ‘dedicated, contractually linked decentralised and renewable or low carbon source’? How would this be monitored and enforced? What is the ‘low carbon infrastructure fund’, how is this ‘justified’ and how will it work? [see also 5.18]*

5. As stated in previous representations, it is noted that the GNDDP have carried out a Sustainable Energy Study for the Joint Core Strategy, which suggests that although this is potentially the cheapest way of delivering a zero carbon development (if provided through wind turbines) the report also notes that there are very few housing developments in the UK that have established contractual arrangements in this way (page 4, of the Sustainable Energy Strategy). As such, there are concerns that such a strategy is not deliverable and therefore is unsound.
6. In addition, it is not clear how viability has been taken into account in requiring developments to do this in the context of other requirements, such as the Code for Sustainable Homes, affordable housing and section 106, which will also be placed on major development. As such, it is not considered that a robust strategic viability study has been undertaken in this regard in line with paragraphs 26 and 28 of the supplement to PPS1. As such this strategy is not in accordance with national planning policy.
7. In terms of the principle of carbon offsetting, it is considered that this could be a useful mechanism to reduce carbon emissions. However, it is unclear why this is limited to smaller schemes. To ensure flexibility when dealing with site specific circumstances and to ensure that the most appropriate means of carbon saving can be achieved, it is considered that the policy should be more flexible in the potential application of this part of the policy. .

Question F4 [re 5.16 – last sentence] *Would it be compliant with the tests in Circular 05/05 (and now Reg 122 of the CIL Regulations in respect of S106 agreements) to require new developments to contribute funds for improving the energy efficiency of existing houses?*

8. It is considered that such a requirement would be contrary to the tests in Circular 05/05 to require developments to contribute funds for improving energy efficiency of existing houses as it would not be necessary to make a proposed development acceptable in planning terms and would not be directly related to the proposed development. However, there may be circumstances, due to feasibility of viability, where this can result in the achievement of carbon savings that could not be reasonably achieved on-site or through other means. However, it is expected that this would be considered on a site by site basis and achieved through agreement between the Council and an applicant.