

**Examination into The Joint Core Strategy (JCS) For Broadland, Norwich  
and South Norfolk Produced By  
The Greater Norwich Development Partnership**

**Response to Inspector's Questions and Matters**

**Matter 8**

**Sustainability, environment and design  
(subject matter of JCS policies 1, 2 and 3)**

**Submissions by Savills (L&P) Ltd  
on behalf of Taylor Wimpey UK Ltd, Hopkins Homes Ltd, Persimmon  
Homes (Anglia) (respondent no. 8726), part of the Broadland Land Trust  
(respondent no. 8366 )**

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

**Policy 3:**

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

***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]***

1. Paragraph 19 of the Supplement to PPS1 states that policies in relation to renewable and low carbon energy generation should be designed to promote and not restrict renewable and low-carbon energy and supporting infrastructure. Paragraph 26 advises that planning authorities should avoid prescription on technologies and be flexible in how carbon savings from local energy supplies are to be secured. As currently worded, the policy appears to be contrary to the supplement to PPS1.
2. We also consider that it is unreasonable that for major development **all** [our emphasis] of the proposals energy needs be met from such sources. The supplement to PPS1 requires such policies to be tested for viability and their impact on housing supply. We are not aware that has been done.

***F2 [bullet 2] Is the GNDP carbon offset fund a 'justified' concept and can it be implemented effectively? [see also 5.18]***

3. We consider that the principle of carbon offsetting could be a useful means of reducing carbon emissions. Having accepted that carbon offsetting is acceptable in principle, it is unclear why it is only applied in limited circumstances. If in relation to a development, more significant carbon savings can be achieved through offsetting, rather than on-site measures, the policy should allow for this.

***F3 [bullets 3&4] Is this policy material justified, effective, and consistent with national policy in PPS supplement para 11 (re the need for Local Planning Authorities to adhere to the principle of not duplicating controls under planning and other regulatory regimes) and paras 31/32 (re the possibility of there being situations in which it 'could' be appropriate to anticipate levels of building sustainability in advance of national standards and, in such cases, demonstrating clearly 'the local circumstances that warrant and allow this' and focusing 'on development area or site specific opportunities')? What is the justification for departing from the national programme for strengthening the Building Regulations? Is the Greater Norwich Sustainable Energy Study sufficiently sound and convincingly based to support the mandatory approach set out in policy 3?***

4. We have no doubt that there is an urgent need to tackle Climate Change and use resources more efficiently. However, we do not consider that this is an issue which the LDF needs to address.
5. The Code for Sustainable Homes sets a timetable for improving the environmental performance of new homes and sets out an already challenging timetable for all new homes to be zero carbon from 2016. The forthcoming Code for Sustainable Buildings will similarly set out a timetable for delivering zero carbon buildings for other forms of development. The challenging targets being set by Government to the development

industry means that this issue has been effectively dealt with and that there is no need for the development plan to address such issues. Changes to the Building Regulations will come into force this year to deliver around a 25% improvement in energy efficiency. These changes themselves will bring additional costs to the construction industry.

6. The planning system is already complex and presents many obstacles to delivering much needed new homes. Asking the planning system to duplicate provisions carried out elsewhere is unnecessary.
7. The principle upon which national policy is based as set out in the Supplement to PPS 1, and re-stated in Draft Policy LCF12, is that regulatory compliance mechanisms should “complement and not duplicate one another”. The energy requirements are dealt with via the Building Regulations, and therefore inclusion within the plan of such an approach is contrary to the supplement to PPS1, paragraph 11.
8. These aspirations have not been tested in accordance with the requirements of the supplement to PPS1. Paragraph 33 of the Supplement requires that any local approaches should:
  - be set out in a DPD so as to ensure examination by an independent Inspector
  - be evidence-based and viable, having regard to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact on the development needs of communities; and
  - demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing and not inhibit the provision of affordable housing.
9. In terms of costs of implementing the Code for Sustainable Homes, it is becoming clearer that the costs of implementing the Code is higher than had previously been expected. The Energy Study includes costs for delivering zero carbon development, but does not include an assessment of cost for achieving Code 4. Research by the Zero Carbon Hub (ZCH) ‘Defining a Fabric Energy Efficiency Standard for zero carbon homes’ published in November 2009 identified that the average costs of achieving just the energy efficiency requirements for Code Level 3 to be in the range of 9 - 11%. Adding the further requirements for achieving Code Level 3 in its entirety will be significantly more than the 9 – 11% noted in the ZCH findings.
10. In relation to zero carbon homes, what meets this standard has not yet been defined. We do not consider it can be sound to advance a standard, which is as yet not defined.
11. The approach in the plan is not justified by the evidence base.

**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?**

12. We set out our views on carbon offsetting at F2.

**F7 [re water efficiency] Does the standard sought in policy 20 imply a requirement in advance of national standards? Is this justified and deliverable? [See also 5.22]**

13. The Code for Sustainable Homes sets a timetable for improving the environmental performance of new homes and sets out an already challenging standards for reducing water consumption. The forthcoming Code for Sustainable Buildings will similarly set out a timetable for other forms of development.

14. The planning system is already complex and presents many obstacles to delivering much needed new homes. Asking the planning system to duplicate provisions carried out elsewhere is unnecessary. The principle upon which national policy is that regulatory compliance mechanisms should “complement and not duplicate one another”. The water requirements are dealt with via the Building Regulations and Code, and therefore inclusion within the plan of such an approach is unnecessary.