

Examination of the JCS for Broadland, Norwich and South Norfolk

Additional Hearing Day: 9 December 2010

Item 4 “Taking stock concerning JCS policy 3”

Statement, Councillor Andrew Boswell, Norwich Green party, 8th December 2010

1. I agree with Appendix 3, bullet 2, that there is not a sufficient evidence-base for submitted JCS Policy 3. The Policy consequentially sets an unrealistic, and therefore undeliverable, high target.
2. Appendix 3, bullet 1 (of the notes for the 9th December), quotes PPS1 Supplement: *Planning and Climate Change* is generally supportive of local requirements that **set a target percentage of the energy** to be used in new development coming from ‘decentralised and renewable or low-carbon energy sources’.
3. Appendix 3, bullet 1 (of the notes for the 9th December), quotes PPS22: *Renewable Energy (at para 8)* also supports policies in DPDs which **require a percentage of the energy** to be used in new developments to be derived from on-site renewable energy sources.
4. However, the proposed italicised wording in Appendix 3, bullet 3 (of the notes for the 9th December), does not specify a percentage target for either off-site decentralised and renewable or low-carbon energy sources, or from on-site renewable energy sources.
5. It specifies a *maximum viable proportion of its energy* to be demonstrated through SustainableEnergy Statements. Without a clear steer of what **maximum viable proportion**, the JCS ducks setting any target here. The consequence is that a target of 100% has been reduced to no target.
6. With the proposed revised wording, there is a risk that the effect of the Policy goes from one extreme to the other, and the looseness of the wording is likely to lead to protracted negotiations between developers and the planning authority.
7. With respect to on-site renewable energy production, the Merton Rule is well established and sets out for any development (either new build or conversion) with **a floor-space above 1000m²**, or residential development of ten or more units, to incorporate renewable energy production equipment **to provide at least 10%** of the predicted energy requirements. The Merton rule complies with the guidelines set out in the Supplement to Planning Policy Statement 1: Planning and Climate Change in setting a target, and has been adopted by significant numbers of Councils.
8. As renewable energy technologies advance, it is expected that the affordability and deliverability of Merton type targets can be increase.
9. It is suggested that greater clarity will be introduced by rewording of the first two bullets of policy 3 so that these issues are addressed:
 - a. separate policy streams for off-site and on-site renewable energy sources
 - b. to provide differing targets for each (off-site and on-site)
 - c. to provide, if necessary, different area/unit thresholds for each
 - d. to provide mechanisms for regular target review as technology advances
10. Given that at least four councils have signed up to a 40 per cent carbon emissions reduction target by 2020, on the back of Friends of the Earth’s (FoE’s) ‘Get Serious’ campaign (ref: <http://www.idea.gov.uk/idk/core/page.do?pageId=15558407>), it is suggested at 40% renewable energy in

new build would be a stretching, but realistic, target for JCS outset. This could be delivered by 10% on-site renewable energy (as per Merton rule) and 30% off-site contractually delivered renewable energy

11. It is suggested, then, that the first two bullets of policy 3 may be reworded to capture this as follows:

- A. *Area Action Plans, master planning exercises, or detailed proposals for major developments (minimum 10 dwellings or 1,000 sqm or more of non-residential development), will be required to demonstrate to incorporate renewable energy production equipment to provide at least a required percentage, 10% at JCS outset, of the predicted energy requirements **on-site**.*
- B. *subject to (A) being applicable, the following planning condition shall be applied: “Before any unit is occupied, appropriate renewable energy equipment shall have been installed to provide at least the required percentage, 10% at JCS outset, of predicted energy requirements from **on-site** sources, and the local planning authority shall be satisfied that their day-to-day operation will provide energy for the development for so long as the development remains in existence.”*
- C. ***On-site** Sustainable Energy Statements will be required to show the scheme is meeting A and B.*

- D. *Area Action Plans, master planning exercises, or detailed proposals for major developments (minimum 500 dwellings or 50,000 sqm or more of non-residential development), will be required to demonstrate to incorporate in addition to on-site generation (A & B above) at least a required percentage, 30% at JCS outset, of the predicted energy requirements from **dedicated, off-site** decentralised and renewable or low carbon sources, making the most of any available economies of scale.*
- E. *subject to (D) being applicable, the following planning condition shall be applied: “Before any unit is occupied, contractually linked **dedicated, off-site** decentralised and renewable or low carbon source energy will be demonstrated to provide at least the required percentage, 30% at JCS outset, of predicted energy requirements, and the local planning authority shall be satisfied that their day-to-day operation will provide energy for the development for so long as the development remains in existence.”*
- F. ***Off-site** Sustainable Energy Statements will be required to show the scheme is meeting D and E.*

- G. *Off-site Sustainable Energy Statements will also be required for smaller developments (minimum 10 dwellings or 1,000sqm of non-residential development), demonstrating that the most practicable contribution from contractually linked **dedicated, off-site** decentralised and renewable or low carbon source energy, including a percentage measure of predicted energy requirements, has been supplied taking account of the specific circumstances of the site.*

- H. *The targets for required percentages of both On-site Sustainable Energy and Off-site Sustainable Energy, will be reviewed bi-annually, and set at 10% and 30% respectively at the JCS outset.*