

Written Response on behalf of Zurich Assurance Ltd

Introduction

Zurich Assurance Limited (ZAL) own an area of land at Colney between Old Watton Road and the river Yare (see map attached at Appendix A). In response to South Norfolk's Site Specific Policies and Allocations DPD Initial Public Consultation, we have prepared an overall strategy for the land that proposes significant improvements to the landscape, biodiversity and public access. The strategy also includes proposals to integrate the Earlham Electricity Sub-Station into the surrounding landscape and develop some 6.4 hectares of land for autonomous housing and a retail outlet specialising in local produce.

The purpose of this document is to respond to the advertised changes to the Greater Norwich Joint Core Strategy, proposed by the EIP Inspector,s that appear to have direct consequences for ZAL's Colney estate.

The Proposed Changes

IC7 - New diagrams to replace that at p35 of the JCS

This proposed change substitutes two new diagrams for the existing diagram on page 35 of the JCS, together with a related wording change to paragraph 5.6 and an additional paragraph following 5.8.

The ZAL estate falls within a Biodiversity Enhancement Area, shown on Map 25a, where the intention is to extend and link fragmented habitats. The estate also lies within one of the Sub-Regional Green Infrastructure Corridors shown on Map 25b. Our strategy identifies the ZAL estate as a key link within the Green Infrastructure Priority Areas, identified on page 69 of the JCS as supporting key growth locations. Our vision for the estate includes the following objectives:-

- a renewed landscape, alive with a richer variety of plant insect and animal life
- a landscape more open to the public as a space for peace and reflection
- a landscape structure with the capacity to mitigate the visual impact of the Earlham Electricity Substation on the wider landscape and create a natural setting for development

We support proposed change IC7 in making a clearer distinction between the classification of natural habitats and policy for their enhancement

IC2 Policy 3 - Energy and Water

The proposed change is a rewording of Policy 3's section relating to energy (the existing and proposed texts are set out in Appendix B to this response). We note that the wording is now more flexible, with the aims of minimising reliance on non-renewable high-carbon energy sources and maximising the use of sustainable construction techniques. It is a more practical statement than the one it replaces.

Our strategy for ZAL's Colney Estate includes an area of housing development that would contribute towards South Norfolk DC's search for additional allocations in the Norwich fringe parishes. The strategy states that "ZAL's ambitions reach far beyond just another housing estate. Our proposals will deliver high quality sustainable homes based on "New Autonomous House" principles. The architects Brenda and Robert Vale, succinctly define the concept as follows:-

The autonomous house on its site is defined as a house operating independently of any inputs except those of its immediate environment. The house is not linked to the main services of gas, water, electricity or drainage, but instead uses the income-energy of sun, wind and rain to service itself and process its own wastes."

We note the proposed change's first sentence omits the Policy's original wording on maximising local renewable energy production and would like to see this restored. Our suggested alternative wording is:-

Development in the area will, where possible, aim to minimise reliance on non-renewable high-carbon energy sources, and maximise the use of sustainable construction technologies and locally produced renewable energy.

Otherwise we support the rewording as proposed in IC2.

IC6 Policy4 Affordable Housing

We have always considered that LPA policies on affordable housing are largely too inflexible to cope with changing market conditions and the effect they have on the viability of development projects. Since the 2007 banking crisis, many developers have successfully sought a reduction in affordable housing requirements on both permitted and proposed schemes in order to maintain their viability.

Change reference FC1

On the whole we agree with proposed change FC1 to policy 4. However, our experience shows that affordable housing requirements on smaller schemes, especially when combined with extensive demands for contributions to infrastructure provision, frequently lead to otherwise viable projects being abandoned. Both the scale and range of infrastructure demands vary considerably from one LPA to another, and can have a significant effect on a project's viability. We suggest that there should be no affordable housing requirements on schemes of less than 10 dwellings, other than on "exception sites" in rural settlements.

We propose deleting the first bullet point beginning "On sites for 5-9 dwellings....." from change FC1.

Change reference FC2

We have no comments to make on this proposed change.

Change reference FC3

On the whole we agree with the proposed change in making it clear that Policy 4 should be applied taking account of constantly changing market conditions in assessing the viability of affordable housing provision. However we disagree with the proposed wording of 5.28C, and would like to see this reworded as follows:-

A large amount of residential development is expected to take place on smaller sites in both urban and rural locations. Consequently, in order to make realistic inroads into the identified need and provide affordable housing across a wide range of sites a proportion of affordable housing will be sought on all sites of 10 units or more.

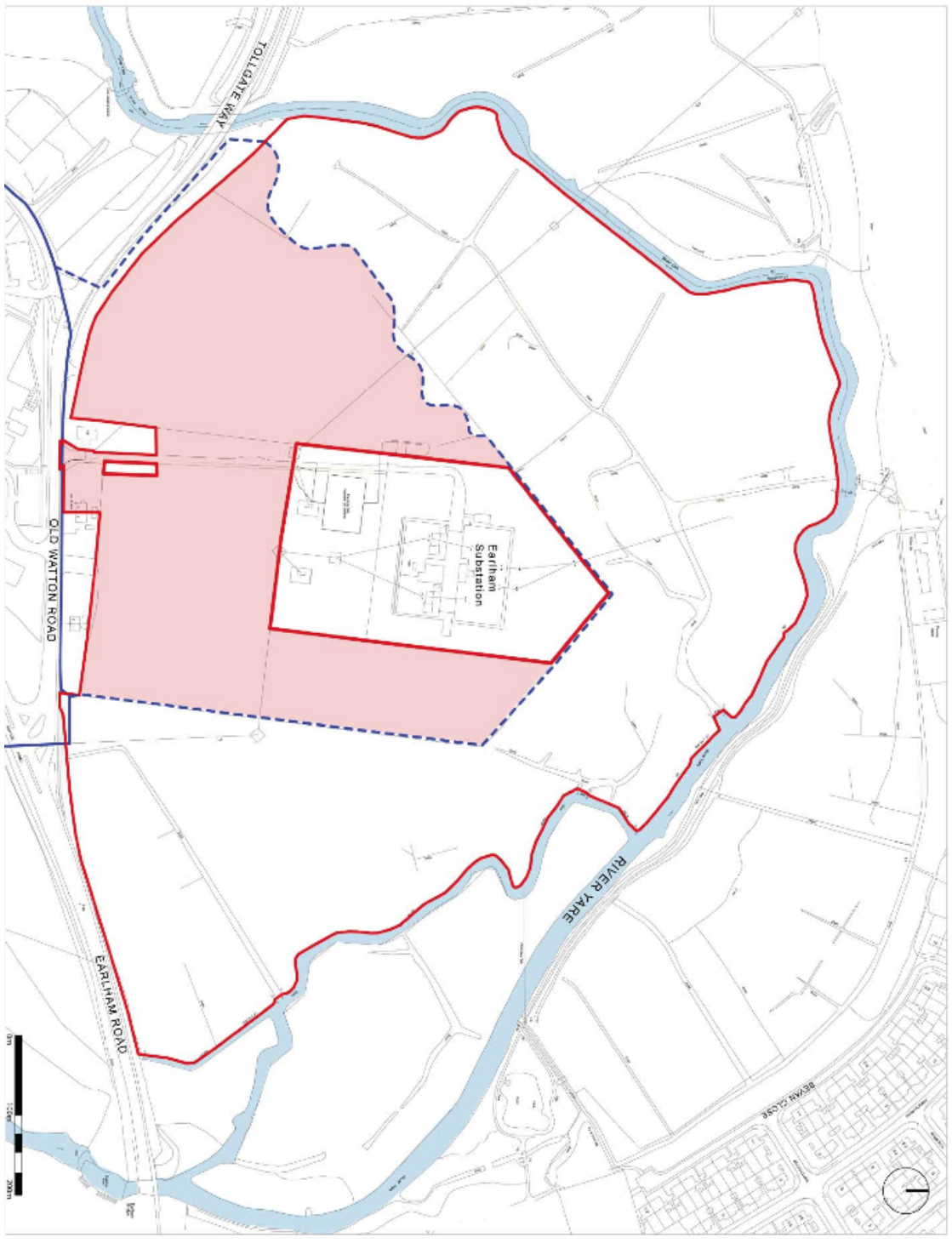
There are a number of available models for assessing scheme viability. It would help if some standard formulation were available, agreed by both LPAs and developers. We would like the JCS to include a commitment to establish an appropriate stakeholder forum with the specific purpose of establishing a standard formula that will assess scheme viability against both affordable housing and infrastructure requirements.

Change reference FC4

We have no comments to make on this proposed change.

Cecil Elliston Ball
Town Planning Intelligence
February 2011

Appendix A – Map of ZAL Colney Estate



- KEY**
- Site Boundary (ZAL Land)
 - Approximate Developable Area = 6.5ha
 - Existing Village Boundary
 - - - Proposed Village Boundary

Appendix B – Policy 3 Energy

Section as submitted

Development in the area will be low or zero carbon and local renewable energy production will be maximised, subject to environmental constraints, to meet regional carbon reduction and renewable energy targets. To achieve this:

- all major development (500 dwellings or 50,000m² for non residential development or more) will be supplied with all their energy needs from dedicated, contractually linked renewable sources. Energy provision will be master-planned through co-ordinated Sustainable Energy Statements. Early phases of development may contribute to the low carbon infrastructure fund to ensure renewable energy infrastructure is provided to serve the whole development through Energy Service Companies
- development of less than 500 dwellings or 50,000m² for non residential development will, having maximised any potential for dedicated contractually linked renewable sources to meet all its energy needs, contribute to the carbon offset fund to make equivalent carbon savings. A Sustainable Energy Statement will be required to identify the most effective solution on a site by site basis and:
- all new housing development must reach Code for Sustainable Homes level 4 for energy on adoption of this plan and level 6 by 2015
- non-residential development that requires an Energy Performance Certificate must meet BREEAM excellent standards on adoption of this plan and BREEAM Outstanding from 2015, or the equivalent standards from the 'Code for Sustainable Buildings' when it is launched

Rewording suggested by the Inspectors

Development in the area will, where possible, aim to minimise reliance on non-renewable high-carbon energy sources and maximise the use of sustainable construction technologies. To help achieve this:

All development proposals of a minimum of 10 dwellings or 1,000sqm of non residential floorspace will be required (a) to include sources of on-site renewable energy providing at least 10% of the scheme's expected energy requirements and (b) to demonstrate through the submission of a Sustainable Energy Statement whether or not there is viable scope for exceeding the minimum percentage provision on that site.

In addition to the requirement above, detailed proposals for any major development (a minimum of 500 dwellings or 50,000sqm of non residential floorspace) will be required to demonstrate through the Sustainable Energy Statement that the scheme is meeting the maximum viable proportion of its expected energy requirements from 'decentralised and renewable or low carbon energy sources' (as defined in the glossary), making the most of any available local economies of scale.

All development proposals of a minimum of 10 or 1,000sqm of non residential floorspace will be required to demonstrate, through the submission of a Sustainable Construction Statement, that all viable and practicable steps have been taken to maximise opportunities for sustainable construction.'