

Joint Core Strategy for Broadland, Norwich and South Norfolk Inspectors' Advertised Changes IC2-3	Representation number 8018
Norwich Green Party Written Submission Response	

Author

This Norwich Green Party representation is authored by Councillor Andrew Boswell. I make this statement as local politician elected to Norfolk County Council in 2005 to represent residents in the Norwich Nelson division, an area to the West of the City Centre. The Green Party hold 21 council seats [14 City Council, 7 County Council] within the Norwich urban area and are the main opposition group on the City Council.

Policy 3, IC2 and IC3

1 We support that inclusion of an on-site renewable energy target that is consistent with the Government's Code for Sustainable Homes, and the Feed-in Tariff or 'Clean Energy Cashback' scheme that great incentive for developers to install on-site renewable energy systems.

2 We note a concern expressed by some developers about the term 'on-site' in that literally 'on-site' renewable energy systems may not be the most sustainable approach in all cases¹. We suggest that this problem may be solved by the use of the term *site specific* instead, where the renewable energy will usually be produced as 'on-site' renewable energy. This terminology also allows for energy production dedicated to the site at a short distance, for example, via a district heating system.

3 However, we believe that the 10% is not sufficiently challenging. This is the figure from the original Merton rule when it was introduced in 2003². As noted at the Inspection, renewable energy technologies have significantly progressed since then in both engineering and cost per unit of energy generated.

4 We propose that the JCS should start at 30% for site specific generated renewable energy as this is more challenging, but realistic, in 2011. We note that Norwich City Council has already indicated it support for a 30% target to be adopted with the Norwich City Council area in its adopted Supplementary Planning Documents. In the Energy Efficiency and Renewable Energy supplementary planning document, adopted December 2006³, it says:

54 The City Council has resolved that it wishes to investigate and promote the development of microgeneration in Norwich. Subject to the Microgeneration Bill, the Council is signaling its intention to seek 30% of energy from microgeneration in new development. Further planning guidance on this will be produced and this will be consulted on.

5 We have provided a 'Track Change' version of the IC2 and IC3 rewording to Policy 3 and paragraph 5.14 that includes suggested changes on top of the "Inspector's Changes" to reflect the above.

Councillor Andrew Boswell
February 3rd 2011

¹ For example, CgMs Consulting on behalf of Barratt Strategic, www.gndp.org.uk/downloads/8223-and-8224-IC3-w.pdf

² http://en.wikipedia.org/wiki/The_Merton_Rule

³ Norwich City Council Energy Efficiency and Renewable Energy supplementary planning document, adopted December 2006, http://www.norwich.gov.uk/intranet_docs/A-Z/Planning%20Policy/Adopted/SPD/Energy_SPD_Adoption_Statement.pdf

IC2 rewording – Track Changes on IC2

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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 site specific renewable energy providing at least 30% 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. Site specific will usually be 'on-site' renewable energy, but also allows for site specific renewable energy that is generated at a short distance, for example, district heating systems.

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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 both on-site and off-site 'decentralised and renewable or low carbon energy sources' (as defined in the glossary), making the most of any available local economies of scale.

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All development proposals of a minimum of 10 dwellings 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.' Other Development Plan Documents.....'

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5.14 Development in the area will keep track with any current national standards relating to renewable or low carbon energy generation and the use of sustainable building technologies. In the meantime, schemes of a minimum of 10 dwellings or 1,000sqm of non residential floorspace will be required to submit (a) Sustainable Energy Statements demonstrating that provision is made for at least 30% of the development's energy requirements to come from site specific renewable energy sources and (b) Sustainable Construction Statements showing that all viable and practicable steps have been taken to maximise opportunities for sustainable construction. In addition, the Sustainable Energy Statements for larger developments will need to show that the scheme meets the maximum viable proportion of its expected energy requirements from decentralised and renewable or low carbon energy, making the most of any available local economies of scale. Combined heat and power [CHP] and district heating/cooling networks may be the most cost effective ways of achieving these economies. Greater Norwich Development Partnership will promote local energy generation through the establishment of Energy Service Companies (ESCOs), possibly with community ownership.

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5.15 Other Development Plan Documents and Supplementary