

## Sustainability issues - DRAFT

1. The inspectors' questions on environmental issues in policies 1 and 3 relate mainly to green infrastructure provision and the proposed policy approach to ensure new development is water and energy efficient and supplied by sustainable energy sources. The inspectors are seeking confirmation that these policies are justified, evidence based and comply with national policy, and that they can be implemented effectively and viably. The GNDP are confident that the detailed studies on energy, water and green infrastructure provide the local evidence base necessary to justify the policy approach and that viability issues relating to the energy policy can be addressed.
2. In relation to Green Infrastructure, the inspectors have raised concerns over whether the JCS provides sufficient detail on its purpose and deliverability. The GNDP is confident that it can respond to the Inspectors questions by showing how the JCS provides appropriate strategic policy, to be augmented by development management and site allocation policies in each of the 3 districts. Emerging DM policies in Norwich, the first of the 3 authorities to progress subsequent LDF documents, are now being drafted reflecting the JCS. The JCS policy provides the overarching framework for more detailed policies to require GI protection, delivery and management. South Norfolk and Broad land will adapt the JCS framework to their local needs through their subsequent LDF documents.
3. The policy requirement for high levels of water efficiency is justified by the Water Cycle Study. This showed the need to reduce water use to address water quality and availability issues. Greater water efficiency will reduce the need for investment in water supply infrastructure and help to ensure protection of water quality, particularly an issue in designated environmental sites.
4. In the light of the study, the policy differentiates between larger and smaller scale development. It only requires the very highest levels of water efficiency on larger scale developments. These are achievable due to economies of scale, through measures such as greywater recycling. It requires smaller scale development to adopt appropriate water efficiency measures, such as using water efficient appliances.
5. The GNDP is confident that it will be able to prove that this is the most suitable policy approach and will show how this will be implemented through the planning process, using national codes. Without such a policy, developments would only be required to meet less demanding Building Regulations requirements, which are appropriate for much of the country, but are not appropriate to this area of low rainfall and water stress.
6. Energy policy is based on evidence from the Sustainable Energy Study. Following advice from the study, it uses national standards and provides a selective approach for energy production for new development dependent its scale, as larger scale on site energy production is more cost effective.
7. The GNDP will attempt to address the inspectors concerns in relation to consistency with national policy, showing how it is based on a robust evidence base following the government's methodology. We will also attempt to show that there is a need for such a positive policy approach to enable development to make best use of abundant local sustainable energy potential. As with water, the policy recognises that in some instances it will be technically difficult and extremely expensive to achieve carbon

neutrality within a development, particularly in the case of smaller developments where fewer technologies are available. In these instances, where agreement is reached to accept a lower level of onsite carbon reduction than the policy would normally seek, the balance could be made up by a contribution to a carbon offset fund set up to offer grants to the occupiers of existing property to improve the energy efficiency of their property. This approach is in line with the suggested approach, yet to be clarified, from the Coalition government.

8. The GNDP will also attempt to show how, as with the green infrastructure policy, the policy provides an appropriate strategy. The detailed operation of the policy and appropriate contributions will be set out in Development Management DPDs or through a supplementary planning document. This enables flexibility to adapt to emerging government policy, as these policies can be drafted subsequent to the announcement of revisions to national policy, set for the end of 2010.

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