

Consultation Statement

Appendix 8: Response to Representations - Climate change



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026)



GREATER CAMBRIDGE
SHARED PLANNING

Summaries of Draft Plan Representations, and Response to Main Issues Raised

Climate Change

Climate Change Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the ambition in the planning policy relating to climate change. The ambition of both Cambridge City and South Cambridgeshire District Councils relating to climate change targets and wanting to deliver sustainable development was noted.

Concerns were raised about rise in urban heat island effect and need for mitigation in policy. Comments were made about concerns about transport emissions not being considered in policy and that development more generally was generating a lot of carbon emissions, including the carbon emissions from concrete. Comments also queried why the Councils had identified net zero by 2050 and had not set an earlier target such as 2030.

Whilst there was support for the policy standards some said they should go further. It was also proposed that they should be clear that if national or other standards improve beyond the standards referenced in the plan, they should be applied. The need for standards not only to be set but also development to be certified was referenced. Others questioned whether polices would make development unviable, particularly in rural areas.

Concerns were raised about flood risk, management of water and water efficiency, noting the issues of low-lying land and water pressure in this area of the country. There was concern that development would put pressure on chalk streams. Loss of trees, hedges and grass lands should also be considered.

Some supported the circular economy approach, while others questioned whether it could be applied in all circumstances. It was questioned whether the cooling hierarchy could be applied effectively to minor developments, and that cross ventilation was not always possible. The practicality and viability of the water efficiency standards were challenged. Requiring sustainability statements was also considered by some to be unnecessary as information was already provided in other documents.

There was reference to cultural venues, which has been raised on a number of themes, highlighting opportunities for venues to reflect climate change policies. It was also questioned why the Councils send recycling to Northern Ireland rather than processing it locally. There were calls for the creation of an inclusive transport network, including for horse riders. One comment expressed support for the development of a low-carbon heat network in Cambridge City Centre.

Response to the main issues raised in representations:

Comments supporting the broad approach to climate change policies in the draft plan are noted.

Both Cambridge City Council and Cambridgeshire District Council have set out their net zero targets and a climate strategy to set out how they will reduce carbon emissions to meet their respective targets. Planning policy have done further work in the Carbon Budget Assessment (2025) to set out what this means for the Local Plan and how carbon emissions will be reduced.

There is a need for development in Greater Cambridge that the Councils are required to respond to, and the Councils intend to deliver this as sustainably as possible. This includes ensuring that homes are mitigated against heat risk, have high energy efficiency, renewables, and re-use materials and consider whole life carbon emissions in development. Emissions from development are inevitable but the Councils are doing all they can to reduce carbon emissions from growth, by prioritising energy demand reduction, sustainable construction and active travel and public transport to reduce carbon emissions. The plan addresses emissions from transport through identification of a development strategy which focuses development where there are opportunities for active travel and public transport and reducing the reliance on the car.

The climate chapter proposes an ambitious but proportionate approach to reducing carbon emissions and delivering sustainable development. Additional evidence has been set out in the Net Zero Topic Paper Addendum to set out the considerations for the application of policy and how it is implemented considering what could be some alternatives that could be negotiated as part of the planning balance. The policies in the climate chapter have been tested in the Whole Plan Viability Assessment and this has set out that these policies are viable to deliver. Additional technical notes and the Sustainability Checklist will support the consistent implementation of these policies and provide guidance for unique typologies and circumstances where climate mitigation may be more challenging.

Water Supply issues have been carefully considered during the preparation of the Local Plan. Working with the Water Scarcity Group which was established by the government, the Local Plan is supported by a Water Supply evidence base exploring the availability of sustainable water supply alongside the anticipated development trajectory. Infrastructure is planned which will bring new supplies to Greater Cambridge in order to reduce the reliance on water from the chalk aquifer. However, it also remains vital that water is used efficiently in this area therefore water efficiency policies are proposed which set more stringent levels than are applied nationally.

With regard to flood risk, further evidence has been prepared to understand the implications of flood risk in future climate scenarios, and this flood risk data has also informed the site selection through the HELAA process as well.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for climate policies including water reduction, reuse of materials and reducing carbon emissions.	204737 (Optimis Consulting Ltd on behalf of Croudace Homes), 205702 (Newnham Labour), 202645 (C McQuitty), 202957 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 208286 (Turley on behalf of the Imperial War Museum), 210549 (Cambridgeshire County Council)

Cultural venues support low-carbon placemaking and should be reflected in climate policy. Cultural infrastructure contributes to climate outcomes and this should be recognised and embedded in the chapter.

202052 (H Chamberlain)
202137 (Cambridge Junction)
202195 (H Tam)
202397 (T Shaw)
202399 (Kettle's Yard)
202682 (T Altmann)
202712 (W Townsend)
202777 (S Lee)
202864 (Cambridge Junction)
202924 (R Terry)
202978 (T Flinders)
203014 (The Arts Theatre Cambridge)
203323 (N Ellis)
203429 (S Ashworth)
203490 (L Heap)
203506 (D Lever)
203623 (University of Cambridge)
203847 (N Yeni)
203865 (University of Cambridge)
204385 (New International Encounter)
204934 (Wysing Arts Centre)

	<p>205025 (H Paterson) 205026 (University of Cambridge, L. Sheerman) 205115 (J Walsh) 205312 (L Howse) 205349 (A Seiglow) 204674 (NEBAU Architecture Ltd) 204692 (A Giarlis) 204819 (L Matthews) 204934 (Wysing Arts Centre) 205278 (A C de Azevedo Lamha) 205290 (N Oakley) 205381 (Cambridge Junction / Create Cambridge), 202012 (H Chamberlain)</p>
<p>I support Cambridge Junction and Create Cambridge in asking that:</p> <ul style="list-style-type: none"> • cultural infrastructure’s contribution to climate outcomes (adaptive reuse, shared spaces, walkable places) is explicitly recognised • culture is embedded within this chapter, not treated solely as a social outcome <p>Cultural venues support low-carbon placemaking and should be reflected in climate policy.</p>	<p>202382 (J Webber), 202300 (Cambridge Junction), 202807 (Cambridge Junction), 204692 (A Giarlis), 202307 (Cambridge Junction / Create Cambridge), 205278 (A de Azevedo),</p>
<p>The Councils have declared a climate crisis but still send recycling 400miles to Northern Ireland which emits tonnes of CO2.</p>	<p>201221 (S Williams) 201240 (S Williams)</p>

Concrete generates lots of carbon emissions and the strategy for development is not correctly located for where people needs jobs and where there is space for development, Cambridge does not have capacity for more development.	201240 (S Williams)
Flood projections at 2050 must have a massive impact on any growth projections for Greater Cambridge. While there are clearly opportunities in the immediate future, beyond this timeframe any significant growth is very questionable.	201806 (K Rhodes)
While building at relatively high densities is recognised as generally being 'environmentally friendly', the health impacts for individuals of urban living with temperature rise are considerable. Action to mitigate the effects of the existing climate crisis on residents to prevent health disasters and the surrounding biosphere to prevent negative impacts on biodiversity	201806 (K Rhodes) 202448 (Dr J. Neal)
The Climate Change emphasis of the plan is all about future carbon control. This is very important but there is no acknowledgment of the impacts of 'baked in' climate change that takes effect as the plan develops to 2045. While the plan hopes to build with the lowest level carbon impact possible, development of this scale is necessarily carbon intensive. Essentially the less we build, the better for the environment.	201806 (K Rhodes)
Support for development of low carbon heat network in Cambridge City Centre.	202172 (R Lambert)
The carbon intensity associated with new development needs to be better reflected in policy as well as acknowledging impacts of extreme water stress and additional pressure caused by new development.	202172 (R Lambert)

<p>The plan's climate change strategy is for 'Greater Cambridge to transition to net zero by 2050', however the City of Cambridge's Climate Change Strategy is for Cambridge to be net zero carbon by 2030. There is no apparent discussion on why the 2050 ambition has been chosen, despite the 2030 target. Given the impact of the local plan on the city's climate strategy, a 2030 target is required.</p>	<p>202345 (H Brown)</p>
<p>I strongly support the new Net Zero Carbon buildings policy. This is necessary to facilitate a net zero city. I strongly support the policy to protect peatland from development. Wind development on peatland should be included</p>	<p>202476 (I Morris)</p>
<p>The policy on design for a changing climate should provide a stronger steer to developers to deploy the full range of potential design solutions in planning.</p>	<p>202476 (I Morris)</p>
<p>Support the high standards of these policies. It is important that all the climate policies allow for changes in national regulations so when a policy is mentioned (e.g. "Good Homes Overheating Toolkit") this is caveated with something like "and appropriate future updated standards" or "successor documents". This will ensure that our policies keep up with the fast changing climate agenda which will have moved on before future local plans are published.</p>	<p>202882 (Cambridge City Council Liberal Democrat Group)</p>
<p>The climate change policies are ambitious and welcome, particularly on energy efficiency and water use. However, rural implications are not fully explored. Tighter building standards may affect viability of small rural schemes and conversions.</p>	<p>203165 (Cambridgeshire ACRE)</p>

<p>Water neutrality measures could constrain development in villages without clear mitigation pathways.</p>	
<p>Whilst I support what is proposed for new houses as a sound and good idea I am concerned that South Cambridgeshire's District Carbon Zero plan is only based on reducing 'new omissions'. Carbon net zero measures makes no account of the Carbon Dioxide absorbed by existing Trees, Hedges or Grasslands and as such it is inaccurately reporting/measuring progress that is or isn't being made.</p>	<p>204995 (M Jordan)</p>
<p>There is not enough of a focus on emissions from transport. Electric vehicles are not a type of sustainable travel. Net zero assessments should include lifetime transport emissions, not just building emissions. Major development should be required to meet measurable mode share targets.</p>	<p>204496 (D Potts), 204988 (S Webster), 204356 (F Sanchez Garcia), 204654 (P Colledge)</p>
<p>Construction is a very high emissions activity. The policies above don't require embodied, whole life and whole life cycle emissions from developments are predicted before construction and calculated afterwards, so decisions are made in ignorance. There's no requirement ghg emissions should be minimised at the construction stage. The govt's target of 1.5m houses is breaching interim carbon targets, and building-in high future emissions which will breach the 2050 target, The Cambridge plan is part of this.</p>	<p>203692 (A Copping)</p>
<p>The net zero by 2050 target is welcome but insufficient to limit warming to 1.5°C. The Plan should aim for net zero before 2050. Developments should minimise carbon through location, high energy and water efficiency, low-carbon materials,</p>	<p>203659 (Cambridge Green Party)</p>

<p>retrofit, climate resilience and avoidance of high-emission activities, while pursuing net negative carbon. The Local Plan focuses too much on end-state emissions at the expense of cumulative impacts.</p>	
<p>The Climate Change emphasis of the plan is all about future carbon control. This is very important but there is no acknowledgment of the impacts of 'baked in' climate change that takes effect as the plan develops to 2045. While the plan hopes to build with the lowest level carbon impact possible, development of this scale is necessarily carbon intensive. Essentially the less we build, the better for the environment. Managing flood risk is important to.</p>	201806 (K Rhodes)
<p>The policies above are required for mitigating Climate Chaos for EXISTING settlements, not taking responsibility for NEW, unnecessarily attracted to this ultra-fragile Riverlands/prime agricultural region suffering extreme Water Stress. I support the development of a low-carbon heat network in Cambridge City Centre.</p>	202173 (R Lambert)
<p>The Draft Local Plan addresses climate change but lacks a strong focus on transport, which is the largest source of carbon emissions in Greater Cambridge. There are no binding targets to increase walking, cycling, and public transport use, risking continued car-dependent development. To meet climate commitments, the Plan should include transport emissions in net zero assessments and set clear mode-share targets for major developments.</p>	203191 (G Orwell), 209066 (Camcycle), 203554 (P Tribble), 201707 (L Passmore), 201708 (J Anderson), 202166 (M MacGinley),

<p>Policy CC/SD lacks specific penalties for noncompliance, making it likely to be ineffective.</p>	<p>203270 (Horseheath PC)</p>
<p>Policy CC/WE requires dramatic reductions in water usage; we are concerned about how this will be policed and how developers will be encouraged to fund greywater recycling.</p>	<p>203272 (Horseheath PC)</p>
<p>Development should be promoted for higher environmental standards, not just proximity to public transport. Principles of climate change mitigation need to be embedded into all new development.</p>	<p>204737 (Optimis Consulting Ltd on behalf of Croudace Homes) 202759 (A. Bragg)</p>
<p>Concerns that the proposed level of growth is unsustainable in terms of the sub-region's water resources. Concerns raised about impacts of development on chalk streams and water scarcity.</p>	<p>205726 (F Goad), 205777 (Rustat Neighbourhood Association C Cameron), 205815 (R Perucchini), 207964 (S Trueman), 202698 (S Berridge), 202597 (Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust),</p>
<p>We support the plans for moving to net zero but calls for more focus on transport in the discussions about sustainable new housing. Evidence from other new developments suggests that even if vehicle spaces are radically reduced people buy cars and park all over the sites. Investment in public transport and 'active</p>	<p>201629 (Cambridge living streets)</p>

<p>travel' modes counters this. This involves more penetration of housing developments by buses that offer commuters a real alternative; safe walking routes to bus stops; and safe cycling routes. Cars are the biggest source of air pollution, and we need to highlight how they damage air quality.</p>	
<p>Non-motorised infrastructure in rural areas should consistently include equestrian provision, not just cycling and walking. Current Active Travel projects often exclude horse riders, despite rural roads being high-risk for them due to 40–60 mph traffic and the lack of safe alternatives. Bridleways make up less than 15% of the county's Rights of Way network and are highly fragmented, so new rural schemes are crucial opportunities to improve safety and connectivity. Since most equestrians are women, providing safe, joined up access to the countryside also supports equality and health benefits, much like cycling infrastructure has done for cyclists—who in rural settings are predominantly men. Ensuring equestrians are fully included would create a more balanced, inclusive and effective rural Active Travel network.</p>	203937 (S Rogers)
<p>CC/CE Support for policy and use of circular economy principles to reduce embodied carbon.</p>	203524 (Cambridge Ahead)
<p>CC/CE Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term</p>	210349 (Community Campaigner D Barton)

<p>through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.</p>	
<p>CC/CE The policy does not appear to consider a scenario where a dwelling is proposed to be demolished to enable access through to land which is being developed.</p>	<p>204735 (Abbey Properties Limited)</p>
<p>The scale of new development will make it impossible to meet the NetZero carbon target by 2050 and will worsen climate change.</p>	<p>209168 (R Smith)</p>
<p>The plan's climate change strategy is for 'Greater Cambridge to transition to net zero by 2050', however the City of Cambridge's Climate Change Strategy is for Cambridge to be net zero carbon by 2030. There is no apparent discussion on why the 2050 ambition has been chosen, despite the 2030 target. Given the impact of the local plan on the city's climate strategy, a 2030 target is required.</p>	<p>202345 (H Brown)</p>
<p>ECC notes and supports that a climate emergency has been declared by the Greater Cambridge authorities, and that climate change is a strategic priority for the Local Plan. ECC strongly support developments which seek higher energy performance standards for new homes than the requirement to be in accordance with Building Regulations and go beyond Future Homes Standard (FHS). Similarly to Essex, it is recognised and welcomed that the Local Plan is seeking to address the challenge of the availability of water supplies. Attention is drawn to Uttlesford</p>	<p>210461 (Essex County Council)</p>

<p>District Council's Local Plan (examination hearings held June 2025 and found sound in January 2026 – adoption scheduled soon).</p>	
<p>As an energy specialist, I also strongly support the Plan's policies on climate change and energy efficiency. Applying Passivhaus standards to all new housing is excellent, although I would note that insisting on the standard is not sufficient, and Passivhaus homes must be certified to ensure that they truly meet the standard. (Building Control Officers alone do not have the time or the experience to assess whether a dwelling complies with Passivhaus standards.)</p>	<p>203283 (J Palmer)</p>
<p>CC/DC Support for Policy CC/DC. Clarification is sought on the application of the cooling hierarchy, requesting that it be limited to major developments only to avoid disproportionate burdens on minor developments. Concerns are raised regarding the supporting text on cross ventilation, which is seen as overly restrictive; a case-by-case assessment is recommended for the appropriateness of single-aspect dwellings based on site-specific constraints. Specific site constraints that may necessitate single-aspect dwellings include proximity to railway lines or major roads, heritage assets or conservation areas, and constrained urban sites.</p>	<p>204210 (Brookgate Land Ltd and Network Rail Infrastructure)</p>
<p>CC/DC Point 3 of the policy states that "All new dwellings shall be designed to benefit from cross ventilation where possible." While the inclusion of the phrase "where possible" is welcomed and introduces an appropriate degree of flexibility, the</p>	<p>204251 (Bellway Strategic Land) 204723 (Vistry)</p>

<p>supporting text goes on to state that “single aspect dwellings should be avoided for all schemes as effective passive ventilation can be difficult or impossible to achieve.” This supporting text is overly restrictive, and the rigid application of dual-aspect requirements can reduce significantly the number of homes capable of being built within developments, limit density or lead to an undesirable trade-off with habitable space. The policy also does not sufficiently recognise site-specific constraints that may make cross-ventilation or dual-aspect layouts inappropriate or unachievable.</p> <p>Matters are also already addressed by building regulations.</p>	
<p>CC/WE</p> <p>The respondent objects to Policy CC/WE, stating it is unsound due to lack of justification, proportionality, and deliverability based on the Integrated Water Management Study (2025) and Climate Change Topic Paper (2025). The 100 unit threshold for water efficiency requirements is not supported by technical rationale, leading to confusion about differing standards for schemes of varying sizes. The requirement for 80 litres/person/day is more stringent than national Building Regulations, potentially increasing build costs significantly due to the need for complex systems like dual pipe installations and greywater recycling.</p> <p>The policy's reliance on future legislative changes makes it premature and potentially unenforceable, as it cannot impose requirements dependent on uncertain amendments. The application of stringent BREEAM water credits for</p>	<p>204556 (Redrow South Midlands)</p>

<p>non-residential developments lacks flexibility and does not consider the viability impacts or operational requirements of various sectors. The cumulative requirements of the policy have not undergone whole plan viability testing, risking constraints on development and the delivery of homes and employment premises.</p>	
<p>CC/WE Objects to the wording of draft Policy CC/WE regarding potable water, questioning the rationale for applying stricter internal water-use requirements solely based on development size. The respondent supports the aim of reducing water consumption but argues that internal water use is influenced more by occupant behaviour and dwelling specifications than by the scale of development. The policy is seen as potentially arbitrary and not meeting the water efficiency targets set by the Planning Practice Guidance, specifically the optional requirement of 110 litres/person/day. The policy should either apply a consistent, evidence-based standard across all residential developments or provide clear justification for higher requirements for larger schemes.</p>	<p>204259 (Bellway Strategic Land)</p>
<p>Cambridge Water say they currently abstract 60 million litres a day more than the 'sustainable' abstraction limit, which is depleting chalk streams and underground aquifers. Any additional homes will increase the abstraction. Cambridge Water's optimistic modelling says they will reduce this to zero – i.e. sustainable abstraction. Climate change is already making summer droughts more likely, and this will continue until 2050 at least under all emissions scenarios. The planned</p>	<p>203289 (J Palmer)</p>

<p>new reservoirs around Cambridge and the link to Grafham Water will help to meet the current water deficit, but they are not sufficient to meet additional demand from new homes and businesses in Cambridge and South Cambs (or the growth in neighbouring areas).</p>	
<p>CC/SD Objects to Policy CC/SD, stating it is overly prescriptive, insufficiently justified, and risks undermining deliverability. The requirement for a Sustainability Statement for all non-householder applications is deemed excessive and unnecessary, particularly for minor developments. Remove the standalone Sustainability Statement requirement and to allow major developments to include sustainability information within existing documents.</p>	<p>204543 (Redrow South Midlands)</p>
<p>The Plan's emphasis on active travel to combat climate change is more challenging in rural South Cambs compared to Cambridge, raising concerns about its practical application.</p>	<p>210448 (P Deer)</p>
<p>ECC is also mindful that a climate emergency has been declared by the Greater Cambridge authorities, and that climate change is a strategic Priority for the Local Plan. ECC strongly support developments which seek higher energy performance standards for new homes than the requirement to be in accordance with Building Regulations and go beyond Future Homes Standard (FHS). We provide the following information which shows what Essex authorities are doing in this area and see this as an approach the Greater Cambridge authorities could also adopt.</p>	<p>210469 (Essex County Council)</p>

<p>Please refer to the Open Legal Advice B briefing note which can be viewed here. This advises that Local Planning Authorities can require higher building fabric and energy efficiency standards than those set in Building Regulations for new development coming forward now and crucially in advance of adopted local plan 'net zero' policy. The advice highlights that the model policies and evidence base can also be used by those drafting and bringing forward neighbourhood plans in advance of up to date Local Plans.</p>	
<p>Embedding micro rain-gardens and small green spaces within new developments is endorsed to manage surface water and reduce flood risk.</p>	208006 (Cambridgeshire County Council)
<p>Climate policies omit household extensions from Sustainability Statements, lack albedo considerations, do not apply water-efficiency standards to refurbishments, and assume integrated water management without funding for the wastewater-treatment plant relocation.</p>	208099 (Great Shelford PC)
<p>Consideration should be made for Rainwater harvesting, Grey Water Recycling and Battery Storage and Local Energy Grids for new developments, and clarification is needed on whether funding for sustainability initiatives will be spread across Greater Cambridge or concentrated only in new development. Local heat grids with Ground Heat Pump Energy Storage should be considered.</p>	208007 (Cambridgeshire County Council). 208735 (Cambridgeshire County Council)
<p>Concerns that conflicts between heritage and sustainable adaptation creates barriers to real progress in climate change action.</p>	202631 (T Pfaff)

Policy CC/SD: Sustainable development and the climate emergency

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy and the need to address climate change in development.

Concerns were raised about needing flexibility in the policy to relate to different types of development, but on the other hand some respondents were wanting householder development to do more. One representor considered it was overly prescriptive, insufficiently justified, and risks undermining deliverability. Sustainability Statement for all non-householder applications was excessive and unnecessary, particularly for minor developments

Many of the comments focused on the impact of transport, and the absence of measuring, monitoring and reducing emissions from transport, and the need for this to be included in these documents. There was concern that focusing on a move to electric vehicles would not address climate issues. The plan should support active travel and include measurable mode share targets.

On water efficiency there was some concerns targets being too low, or not being clear how they related to different types of development and occupancy of buildings. The water management elements of the policy were welcomed by the Environment Agency, Anglian Water, and Cambridgeshire County Council as Lead Flood Authority. Cambridgeshire County Council noted that all sources of flood risk should be listed out in policy.

Concerns from local residents and local cultural institutions have raised that culture must be integrated in all chapters and not just confined to the Wellbeing chapter. There was also support for inclusion of the project around the Elizabeth Way

underpass, also raised in a number of policy themes.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approaches, are noted.

The policy sets out an ambitious but proportionate approach to tackling the climate crisis through managing heat risk and ensuring that long term adaptation to the climate crisis is achieved in buildings with regard to managing heat risk. This is reflected in Policy CC/SD which sets out the requirements for Sustainability Statements to ensure that all climate related issues are demonstrated as assessed and mitigated against in the planning application submission.

Some comments sought greater detail and specificity on the requirements. The Councils have previously published a sustainability checklist to accompany the adopted local plans. An updated Sustainability Checklist has been prepared, and is provided as an appendix to the Climate Change Topic Paper. Some comments challenged the requirement to provide a Sustainability Statement. It is considered vital that developments demonstrate they have responded effectively to climate change and the policies in the Local Plan. The requirement to provide a statement provides a consistent and clear mechanism for achieving this, and detail can be proportionate to the scale and nature of the proposal.

In response comments on the need to include Transport Carbon Emissions in the sustainability and / or energy assessment, the purpose of the energy statement and sustainability statement is to cover operational carbon emissions and whole life carbon emissions which predominately focus on Scope 1 and 2 emissions using the standard RICS methodology that is used for assessing whole life carbon. The inclusion of Scope 3 emissions from transport in these documents is not common practice. There is a separate policy on transport in the infrastructure chapter which prioritises active travel and has low car

usage which contributes to the wider climate objectives of this local plan. The strategy for the allocation of sites is also led by how much carbon is generated by journeys to key employment sites and amenities from across Greater Cambridge. It is acknowledged that the shift to electric vehicles is only part of the answer, and support for active travel must be central to the aspirations of the plan.

The approach to water standards, the use of litres per person per day design standards is an appropriate and recognised way of delivering water efficacy. The standards respond to local issues by going beyond national standards. It is not necessary to list out all of the sources of flood risk in this policy, but reference to the sequential approach to flood risk has been included.

Other policies in the plan address the issue of cultural infrastructure provision. The opportunities for the Elizabeth Way project have also been recognised on S/PRIA/EG Eastern Gateway.

Table of representations:

General policy comments

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy.	202177 (R Lambert), 202896 (Cambridge City Council Liberal Democrat Group (Cllr Katie Porrer)), 204231 (Cambridge Investment Partnership), 208287 (Imperial War Museum),

	202955 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
We support the intent of policy. Support CC/SD(2) which applies a proportionate approach to sustainability statements. However, we request the addition of the words “where appropriate” when listing the range of issues to address in sustainability statements, to provide the flexibility intended here. The list of content described in paragraph 2 will need to be amended to reflect the final approved policies post examination which may include the need to remove the requirement for ‘net zero carbon’ should the proposed NPPF changes be implemented.	204714 (Vistry)
Policy is supported insofar as it reflects the aspirations of Paragraph 162 of the Framework which establishes that Local Plans should take a proactive approach to mitigating and adapting to climate change. However, the draft Policy text is considered to be ambiguous in its current format, whereby the measures that the Councils are expecting developments to implement are not identified. Further guidance should be published.	211280 (Woolsington One Ltd)
Replace changing climate with climate crisis, remove proportionately from point 1, in point 2 address the impact of development on surrounding townscape and biosphere and reflect urban heat island effect and in point 3 delete the words where possible.	201870 (J Brightman), 201505 (B Greig)

<p>I fully support these measures. Any attempts by developers to cut corners because of cost should be resisted. The inclusion of solar EV and/or solar hot water on all new build roofs is long overdue.</p>	<p>201899 (R Pargeter)</p>
<p>The respondent expresses broad support for Policy CC/SD but raises concerns about clause 1's exclusion of individual household applications from Sustainability Statement requirements, particularly for sizeable extensions or knock-down-rebuild projects.</p> <p>They highlight this exclusion as a missed opportunity to enhance the sustainability of existing properties and suggest that many households would benefit from guidance on prioritising resources for sustainability during renovation or building work.</p>	<p>201561 (Stapleford Parish Council)</p>

Comments highlighting impacts of transport

<p>Summary of issues raised in comments</p>	<p>Comments highlighting this issue</p>
<p>Transport is the major source of emission in Cambridge but is not well included or sufficiently addressed. Transport is the largest part of Cambridgeshire's carbon burn – net zero has to include the transport contributions (not just building emissions) so that it is systematically addressed. Big developments should be enforced to meet targets for share of different transport modes.</p>	<p>201810 (J Baumberg); 201698 (R. MacDonald), 203361 (Great Wilbraham Parish Council), 201819 (T McKeown) 203661 (Cambridge Green Party), 203714 (D. Peters), 204653 (R. Humphrey),</p>

<p>Policies to help satellite villages improve walking and cycling connections. Without these to increase walking, cycling and public transport use, car-dependent development risks undermining the sustainability goals.</p>	<p>205143 (D. Stoughton), 205258 (S. Nuttall), 205599 (A. Kirchgassner),</p>
<p>Transport is a major source of emissions and needs binding outcomes, not general support. Net zero assessments should include lifetime transport emissions, not just building emissions. Major development should be required to meet measurable mode share targets. Assessment of proposed developments should include the whole-life emissions produced by residents driving to distant locations for work, shopping and all other purposes</p> <p>Private electric vehicles are not a type of sustainable travel and should be seen as a last resort - they contribute to Cambridge's terrible congestion problem, damage roads, and can be a danger to vulnerable road users.</p>	<p>204779 (K Brightwell), 203657 (T Preud'homme), 205112 (J Grantham), 203308 (L Dassy) , 201801 (C Barker), 201705 (M. Hickford), 202504 (H. Brown), 201241 (S. Williams), 203184 (A. Hoare) 203195 (G. Orwell) 203657 (T Preud'homme), 203031 (S. Hughes), 201737 (T Burford), 202533 (A Brown), 202853 (J Williams), 203710 (A Hofer), 203105 (K. ap Garth)</p>

	<p>204742 (Mothers CAN Cambridge), 204756 (R de Beaux), 203883 (J Prince), 205603, 205604 (L Dassy) 203660 (Dr V. Ashton) 204554 (Dr R. Hoadley), 205251 (A. Williams), 205408 (A. Kirchgaessner),</p>
<p>We need binding commitments on emissions from transport and net zero assessments should include emissions from transport to/from the building rather than just the building itself. Major developments need to be required to meet specific mode share targets. Therefore, this policy should have explicit, strong, measurable requirements, e.g. build only homes that are net-zero, and development must meet mode share targets.</p> <p>Electric vehicles, though preferable to fossil fuel cars, have a variety of issues including imbedded carbon, tyres and brakes, and so should not be considered be considered a primary form of “sustainable transport”, However, reference to EV charging is welcomed.</p>	<p>201987 (D Langley), 203883 (J Prince), 205495 (R. Humphrey)</p>
<p>The Sustainability Statement requirements omit consideration of public rights of way and equestrian users, despite their relevance to low-carbon travel, health and</p>	<p>203566 (British Horse Society)</p>

<p>wellbeing, and green infrastructure delivery. Rights of way, including bridleways, enable sustainable, non-motorised movement and access to green spaces, reducing reliance on motor vehicles.</p>	
<p>I support the overall climate goals and the sustainable development policies for building fabric. However, I do not feel emissions around transportation are. . The distribution of development into satellite villages and towns requires commuting to and from the major employment centres. I would like to see binding targets for improved active and public transport.</p>	<p>201819 (T McKeown)</p>

Comments relating to water and flooding

<p>Summary of issues raised in comments</p>	<p>Comments highlighting this issue</p>
<p>Anglian Water fully supports the policy requirements to ensure sustainable and resilient development embeds the principles of climate change mitigation and adaptation. We agree that a proportionate Sustainability Statement should be submitted to demonstrate how these policy requirements have been met, and these may be supported by separate assessments or strategies including flood risk assessments and surface water drainage strategies. The inclusion of integrated water management, nature-based solutions and circular economy fully align with the sustainable use of water resources, that contribute towards "Enabling Water Smart Communities" www.ewsc.org.uk .</p>	<p>210198 (Anglian Water Services)</p>

<p>We welcome this policy and the requirement for Sustainability Statements to be submitted for major development proposals. In particular, we support the requirement for statements to include how water management has been considered in an integrated way which protects and enhances water quality and the reference to the use of 'nature based design solutions' in point 2. We recommend adding the following wording to bullet 8 on what a Sustainability Statement should include: 'Demonstrate that flood risk from all sources has been avoided or managed if it is not possible to sequentially locate all development outside areas of flood risk.'</p>	<p>211132 (Environment Agency)</p>
<p>Policy places emphasis on how new developments should demonstrated flood risk from all sources has been avoided or managed. It would be beneficial to list all sources of flood risk. Sources include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources (Paragraph 001 PPG).</p>	<p>210575 (Cambridgeshire County Council)</p>
<p>As with energy usage targets, the assumptions regarding usage of the properties are not clear, which make it difficult to judge the targets objectively. Not clear how they reflect different occupancy patterns or use in gardens.</p>	<p>201927 (R Pargeter)</p>

Comments on Policy Requirements and Implementation

<p>Summary of issues raised in comments</p>	<p>Comments highlighting this issue</p>
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<p>Comments requesting the requirements of the policy are strengthened, noting that the supporting information should clarify that statements must, at minimum, show how developments meet the standards set out in relevant policies, rather than addressing issues only “where relevant.”</p>	<p>203661 (Cambridge Green Party)</p>
<p>Concerns raised whether it is proportionate and appropriate that all applications will be required to submit a sustainability statement without any consideration of the type of development or the context such as where large-scale development is delivered in phases and sustainability is addressed strategically, further suggesting that the policy is amended to acknowledge that where site-wide or phased sustainability strategies are in place already a conformity statement should be submitted rather than a standalone sustainability</p>	<p>209205 (Urban & Civic), 208332 (Gladman Developments), 208351 (T. Elbourn), 208960, 208961 (Persimmon Homes East Midlands)</p>
<p>Suggestions that the draft Policy is amended so that the flexibility applied to minor applications is extended to major applications to ensure details are commensurate with the proposed development, and the requirements set out are clarified for the different scales of development.</p>	<p>209206, 209207 (Urban & Civic), 203153 (ESCO Prospect), 208962 (Persimmon Homes East Midlands), 208986 (Barratt Homes Northampton), 210913 (Great Shelford Parish Council),</p>
<p>Comments emphasising the need for flexibility to adapt to changes in national climate change policy and good practice throughout the Plan's lifetime.</p>	<p>203041 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 204289 (Tritax Big Box Developments)</p>

	<p>204093 (E. W. Pepper Ltd.), 208287 (Imperial War Museum) 208351 (T. Elbourn), 210279 (Vistry Group),</p>
<p>Concerns that requirements exceed national standards, creating inconsistency with the sector agreed pathway set out in the Future Homes Hub One Plan and the Net Zero Transition Plan.</p>	<p>204755 (Hill), 208986 (Barratt Homes Northampton), 210280 (Vistry Group),</p>
<p>Comments noting that the policy should be strengthened with a suggested length for the sustainability statement, and we would like to see householders also be required to demonstrate some level of engagement with the range of sustainability issues, particularly water management, climate change adaptation and zero carbon.</p>	<p>204742 (Mothers CAN Cambridge), 204756 (R de Beaux), 203883 (J Prince), 205603, 205604 (L Dassy), 203129 (Cambridge Past, Present and Future), 204048 (B. Young), 204444 (Max Fordham, Ms H. Bennett),</p>
<p>Comments highlighting that the strategy requires 'ensuring that development is sited in places that help to limit carbon emissions'.</p> <p>This policy needs to follow that strategy requirement, requiring planning permission to only be granted if development is sited in places that help to limit carbon emissions, as even if the development itself is sustainable, that</p>	<p>203546 (P. Tribble)</p>

<p>sustainability is lost if high emissions are required in order to meet transport needs. In addition to the items listed in 4.11, the Sustainability Statement should outline how the proposed location of the development enables the use of sustainable transport.</p>	
<p>The policy must ensure compliance with the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as required by NPPF paragraph 174.</p>	<p>208951 (CPRE Cambridgeshire and Peterborough)</p>

Comments on specific types of development

<p>Summary of issues raised in comments</p>	<p>Comments highlighting this issue</p>
<p>Cultural venues support low-carbon placemaking and should be reflected in climate policy. Cultural infrastructure contributes to climate outcomes and this should be recognised and embedded in the chapter.</p> <p>I support Cambridge Junction and Create Cambridge in asking that:</p> <ul style="list-style-type: none"> • cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • culture is treated with parity alongside housing, transport and utilities as core civic infrastructure • Create Cambridge is engaged as advisor/consultee on the further development 	<p>202064 (H Chamberlain), 202750 (Cambridge Junction/Create Cambridge), 204155 (Cambridge Junction/Create Cambridge), 202765 (Cambridge Junction/Create Cambridge), 202946 (R Terry), 202965 (T Flinders), 202469 (K Jones), 202893 (Cambridge Junction), 202151 (Cambridge Junction) 202206 (H Tam), 202318 (Cambridge Junction)</p>

of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding Culture across the city's plans.

202400 (J Webber),
202419 (T Shaw),
202692 (T Altmann)
202722 (W. Townsend),
202895 (Cambridge Junction, R. Tinkler),
202064 (H Chamberlain),
203368 (N. Ellis)
203450 (S. Ashworth)
203500 (L. Heap)
203551 (D. Lever)
203646 (University of Cambridge, Dr Svendsen)
203857 (N. Yeni),
203878 (University of Cambridge, Dr J. Fritsch),
204193 (Cambridge Junction / Create
Cambridge, M. Burman)
204417 (New International Encounter, Ms L.
Elmer),
204859 (L. Matthews),
205074 (University of Cambridge, L.
Sheerman),
205138 (H. Paterson),

	<p>205219 (J. Walsh), 205373 (L. Howse), 205424 (Cambridge Junction / Create Cambridge (E. Hine), 205439 (A. Seiglow),</p>
<p>support: principles of sustainable development / retention of concrete infrastructures in a climate emergency: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I object to proposals to demolish the Underpass, proposals were rejected during the 2023 consultation. It would cause unnecessary disturbance and high-carbon emissions to backfill and level the underpass drum 70's transport infrastructure which contains existing biodiversity and has proven potential as an inviting public square.</p> <p>I support minimal environmental footprint / maximum impact redevelopment of the as-found underpasses and under crofts, greening of the public realm in and around the transport infrastructure.</p>	<p>204282 (L. Cooke), 204516 (T. Woodcock), 205113 (M. Cleminson), 205197 (T. Ziromskas), 205228 (Cambridge Junction / Create Cambridge (M. Burman),</p>

Policy CC/DC Designing for Climate Change

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for a climate change adaptation policy with inclusion of the cooling hierarchy from a range of comments.

Comments were made that while the policy was supported, it needed to be strengthened in relation to the role of green infrastructure in reducing the impacts of the Urban Heat Island effect, consideration of the albedo of materials and ensuring that external shading was prioritised to reduce overheating risk in new homes. Those responding suggested that reference to specific measures could usefully be added to the policy.

Concerns from local groups and residents were raised in relation to the wording around cross ventilation, with a concern that this could allow for too many single aspect units to be brought forward. Some developers raised concerns that the wording in relation to requiring cross ventilation where practicable was too prescriptive and felt that consideration of overheating should be left to Part O of Building Regulations.

Some developers also raised concerns about the importance that the policy enables sufficient flexibility to accommodate changes in climate change policy and good practice over the plan period given the Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes. Reference was also made to the need for all policies to be subject to viability testing. Another comment said it

should include an exception for buildings of unique type and nature.

Further responses raised the need for policy CC/NZ and policy CC/DC to be combined as both dealt with climate change mitigation.

Response to the main issues raised in representations:

In response to comments relating to the Urban Heat Island Effect and the role of nature based solutions and greening for cooling, the policy wording has now been amended to include specific reference to the role of both green and blue infrastructure, the definition of green infrastructure in the glossary includes blue and green infrastructure, to provide evaporative cooling, enhancement of tree canopy cover to provide shade and the use of cool materials. Further detail is provided in the supporting text and a new policy with requirements related to the urban greening factor has been included in the local plan (policy BG/UGF). Further guidance on mitigating the urban heat island effect will also be provided in a future technical guidance note building on guidance already included in the adopted Greater Cambridge Sustainable Design and Construction SPD (2020).

In response to the various comments suggesting amendments and strengthening of the cooling hierarchy and prioritisation of passive design measures to help mitigate overheating risk, the cooling hierarchy has now been embedded within the policy wording as opposed to being within the supporting text. Additional requirements in relation to the need for glazing ratios needing to respond to orientation and the avoidance of floor to ceiling glazing on exposed elevations unless accompanied by external shading and a secure means of providing natural ventilation has also been added to the policy. Further guidance on issues such as external shading will be provided in a future technical note.

In response to calls to strengthen the policy in relation to avoiding single aspect units, while we recognise the concerns regarding single aspect dwellings, it is not always possible to design out all single aspect dwellings, and there is a need for policy to provide some flexibility to developers especially where it can be demonstrated that schemes are compliant with Building Regulations Parts F and O. The policy requires evidence in the form of detailed thermal modelling that schemes can be delivered that meet Part O requirements with consideration also given to future climate scenarios. The policy wording has been strengthened so that where single aspect units remain, applicants must clearly demonstrate that their design has followed the cooling hierarchy and prioritised the use of passive design measures and the use of external shading to reduce internal solar gains.

In response to comments relating to leaving the consideration of overheating to Building Regulations and concerns about viability and the flexibility of the policy, paragraph 162 of the NPPF is clear that plans should take a proactive approach to mitigating and adapting to climate change, including consideration of the risk of overheating. The draft Placemaking and Design PPG also sees a clear role for the planning process in considering the risk of overheating in new homes and buildings and noting the vital role that local design policies can play in addressing the challenge posed by our changing climate. The guidance set out in the PPG for addressing overheating and thermal comfort follows that set out in policy CC/DC. The policy does not seek to require additional modelling beyond that required for Part O compliance. It does, however, seek to ensure that measures to reduce overheating are considered early in the design of development, in order to ensure that priority is given to passive design measures, reduce costs and to ensure that schemes can be delivered post approval without the need for changes to facade design after Part O assessment has been undertaken, which usually takes place after planning permission has been granted. This is a continuation of the approach already set out in the current Cambridge and South Cambridgeshire Local Plans and the Greater Cambridge Sustainable Design and Construction SPD, which provides sufficient flexibility to applicants in relation to the measures implemented as part of the design of proposals and is already being successfully applied to developments across Greater Cambridge for both residential and non-residential development with no impact on the viability of development.

With regards to the calls to combine policies CC/NZ and CC/DC, this is not considered appropriate as policy CC/NZ specifically deals with climate mitigation and metrics to deliver net zero carbon development, while policy CC/DC relates to climate change adaptation. Buildings of a unique nature are capable of being considered as a material consideration.

Tables of representations:

Support for the Policy Approach

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for the designing for a climate change policy, including use of the cooling hierarchy.</p> <p>Comments highlighting that the principles are both appropriate and capable of guiding development that meets local and regional needs.</p>	<p>205514 (BCN Wildlife Trust), 201562 (Stapleford PC), 202841 (Dr Cook), 202771 (A Bragg), 202839 (Carbon Neutral Cambridge), 203158 (ESCO Prospect), 203664 (Cambridge Green Party), 204449 (Max Fordham), 204746 (Mothers CAN Cambridge) 210578 (Cambridgeshire County Council), 204299 (Tritax Big Box Developments) 202405 (University of Cambridge, Mark Parsons),</p>

	204235 (Cambridge Investment Partnership), 211536 (Martin Grant Land Limited)
Very supportive of the need for cross ventilation and avoidance of single aspect homes	202903 (Cambridge City Council Liberal Democrat Group)

General Policy Comments

Summary of issues raised in comments	Comments highlighting this issue
<p>The policy needs to be made significantly more detailed, with stronger requirements. It must learn from countries that already have the sort of climate we are likely to have here in future.</p> <p>Designing for a changing climate states that “development proposals should reflect the cooling hierarchy priority order”. In our view this is inadequate, because overheating is already a serious problem and climate change is going to significantly increase the risk. Solar Shading (for summer months) should be a top priority.</p> <p>The report by the Committee on Climate change “Risks to health, wellbeing and productivity from overheating in buildings July 2022” points out that “around a fifth of homes in the UK are already overheating in summers today”, while the</p>	203098 (Carbon Neutral Cambridge)

<p>Environment Agency warns that we need to prepare for heatwaves temperatures to be 6.6C higher by 2100</p>	
<p>Residents and the Cambridge Green Party have raised concerns about development of sites worsening the urban heat island and to leave vegetation on waste ground to enable transpiration. All applications to evaluate and then actively and effectively reduce existing and/or future UHI effect (including impacts on surrounding townscape and biosphere) and integrate blue and green infrastructure as connected cooling corridors to reduce UHI and ensure equitable access to cooler environments.</p>	<p>201242 (S Williams), 201878 (J Hurst), 202180 (R Lambert), 203664 (Cambridge Green Party), 205652 (S Buckingham), 205665 (D Storey), 207651 (Duxford PC)</p>
<p>Consider that the policy is essential but needs strengthening. Remove reference to cross ventilation where possible as this may allow projects to implementing it on viability grounds. Demonstration of compliance with future weather files should be required and clarification of what passive design solutions mean to ensure implementation of external measures.</p>	<p>204449 (Max Fordham), 204746 (Mothers CAN Cambridge)</p>
<p>The scale of development must be drastically reduced – the region has already exceeded its carbon emissions budget for 2030.</p>	<p>205657 (S Buckingham)</p>
<p>The longer the heatwave, the hotter houses become, even when taking exemplary passive measures to reduce overheating. As heatwaves will become hotter and longer in duration, it's important that planning policy requires developers to design for this. Representation includes evidence for the results of research into the effectiveness of taking all reasonable passive measures to</p>	<p>203127 (Carbon Neutral Cambridge)</p>

reduce overheating in an Edwardian terraced house in Cambridge, but also the steady rise in temperature day-by-day.	
Sustainability Statements must account for all GHG emissions (embodied or otherwise, directly and indirectly)	205657 (S Buckingham)
The policy should be strengthened to explicitly address the impact of any development not only on future edifices but (more importantly) on surrounding townscape and biosphere	201878 (J Hurst), 202180 (R Lambert), 205652 (S. Buckingham), 205665 (D Storey), 207651 (Duxford PC, Cllr Ian Walters) 201548 (T. Neal) 201341 (J Neal), 205440 (C Aman), 202976 (Cambridge G Self), 203522 (Federation of Cambridge Resident's Associations), 201548 (T. Neal) 201735 (Dr J. Neal), 201742 (J. Johnson) 201868 (J. Brightman)

Comments about Specific Design Measures to Address Urban Heating

Summary of issues raised in comments	Comments highlighting this issue
Design should include outdoor spaces as well. Should be more directive about outdoor space design and ensuring spaces have ample shading etc., rather than just requiring standards for individual dwellings.	202841 (Dr Cook), 203008 (M Cleminson), 202618 (C. Pointon), 203201 (P. Tribble),
The Wildlife Trust supports the use of Natural England's Urban Greening Factor in urban areas but concerns about how this will be used for standalone new settlements and rural development locations (raised in relation to policy BG/GI but some crossover).	205514 (BCN Wildlife Trust)
Policy needs strengthening – solar shading must be a top priority and external shading on all south and west facing glazing, with a means to maintain it should be required. White surfaces should be encouraged to reduce heat buildup. Attempt to plan for a global temperature rise of 4 degrees.	202771 (A Bragg), 203109 (Carbon Neutral Cambridge)
Policy should explicitly encourage and support the use of low carbon materials in construction (e.g. timber)	202839 (Carbon Neutral Cambridge)
Reference to value of low-emissivity glass to reduce solar gain in summer and heat loss in winter and vacuum glazing	203133 (CPPF)
The policy should explicitly apply to all forms of development, including buildings, streets, spaces, places, redevelopment and refurbishment.	203664 (Cambridge Green Party)

<p>Incorporate specific measures to mitigate the urban heat island including shading and cool materials.</p>	<p>204449 (Max Fordham), 204746 (Mothers CAN Cambridge), 201548 (T. Neal)</p>
<p>White walls help reduce overheating in summer heatwaves and will also help reduce urban heat island effects, so should be encouraged. The south facing external surface of houses with a brick facing averaged 50.1C, 14.3C hotter than the white painted ones</p>	<p>202816 (A Bragg)</p>
<p>Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal divides regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.</p> <p>Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.</p>	<p>210350 (Community Campaigner D Barton)</p>
<p>Support for the policy but should refer to green roofs and how surface water systems should be designed with an allowance for climate change (Climate change allowances for peak rainfall).</p>	<p>210578 (Cambridgeshire County Council)</p>

Rural active travel routes should be bridleway to include equestrians	203938, 203942 (S Rogers)
Please ban wood burners which the press in particular have stated create more pollution than cars. Please preserve as many trees in private ownership as possible to shade properties and absorb carbon.	202376 (S Hegarty),
Comment regarding possible conflicts between “cool roofs” and using roof spaces for other development purposes, such as generating electricity and solar hot water.	201900 (R. Pargeter)
We note that the Net Zero Carbon Building Standard results are not yet published, so our comments on the Designing for a Changing Climate policy may be revised at the Regulation 19 stage.	208294 (Trinity College)

Comments Suggesting Changes to Policy Wording

Summary of issues raised in comments	Comments highlighting this issue
Delete the words "where possible" from the policy.	201878 (J Hurst), 202180 (R Lambert), 203664 (Cambridge Green Party), 205652 (S Buckingham), 205665 (D Storey), 207651 (Duxford PC, Cllr Ian Walters) 201548 (T. Neal) 201341 (J Neal),

	<p>205440 (C Aman), 202976 (Cambridge G Self), 203522 (Federation of Cambridge Resident's Associations), 201548 (T. Neal) 201735 (Dr J. Neal), 201742 (J. Johnson) 201868 (J. Brightman)</p>
<p>Replace changing climate with climate crisis throughout and change the wording to "respond proportionately and actively to the emerging climate crisis" (not "positively respond to our changing climate").</p>	<p>201878 (J Hurst), 202180 (R Lambert), 203664 (Cambridge Green Party), 205652 (S. Buckingham), 205665 (D Storey), 207651 (Duxford PC, Cllr Ian Walters) 201548 (T. Neal) 201341 (J Neal), 205440 (C Aman), 202976 (Cambridge G Self), 203522 (Federation of Cambridge Resident's Associations), 201548 (T. Neal)</p>

	201735 (Dr J. Neal), 201742 (J. Johnson) 201868 (J. Brightman)
Include consideration of albedo effect of new development at paragraph 4.17, which can be mitigated through building design.	201562 (Stapleford PC), 210914 (Great Shelford Parish Council)
The policy should be amended to include the following text: 'Buildings which have heritage and/ or specific functional constraints will be provided additional commercial or technical flexibility with these requirements subject to the provision of evidence'.	208250 (Kings College)
The policy should be amended to include the following text: "Buildings of a unique nature and type (e.g. visitor attractions) may be provided additional commercial or technical flexibility."	208288 (Imperial War Museum), 208303 (Girton College)
We suggest replace the hierarchy with: "Developments must demonstrate that they have appropriately assessed and mitigated the risk of overheating using a performance based approach (e.g., CIBSE TM59), applying passive, active and hybrid cooling measures as appropriate to site context".	208963 (Persimmon Homes East Midlands)

Comments raising Concerns about the Policy and Implementation

Summary of issues raised in comments	Comments highlighting this issue
Vistry have concerns regarding the prescriptive nature of part 3 of the policy, which states that "all new dwellings shall be designed to benefit from cross	204844 (Vistry Group)

<p>ventilation where possible, and take passive, design-led approaches to reducing excess solar gain.” While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. Vistry consider that this Policy should be deleted to reduce reporting and administration associated with the Draft Plan.</p>	
<p>While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. Some of our buildings may require large open spaces such as lecture theatres which present unique challenges to issues such as ventilation and overheating.</p>	<p>208250 (Kings College), 208288 (Imperial War Museum), 208303 (Girton College), 210281 (Vistry Group)</p>
<p>It is important to ensure the policy enables sufficient flexibility to accommodate changes in climate change policy and good practice over the plan period. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes. The Local Plan will therefore need to build in suitable flexibility to accommodate these changes over the plan period. The Plan will also need to be informed by a viability assessment to ensure policies are achievable, and the cumulative cost of policies will not undermine deliverability of the Plan – Policy</p>	<p>203353 (Babraham Research Campus), 203043 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 208963 (Persimmon Homes East Midlands), 208988 (Barratt Homes Northampton),</p>

<p>CC/DC should be revised to provide a more flexible, evidence-based and proportionate approach to climate-resilient design.</p>	
<p>Policy CC/DC sets out how developments in terms of design and placemaking should mitigate against the challenge of climate change, including overheating. Hill acknowledges the importance of new developments to be climate efficient as possible. However, the principles set out under Policy CC/DC largely replicate the principles listed under draft Policy CC/NZ. It is suggested that the two policies are combined to avoid unnecessary repetition.</p>	<p>204757 (Hill)</p>
<p>Object to use of must at CC/DC (1) as leaves little to no discretion for decision makers – should would be more appropriate in reaching a balanced judgement</p>	<p>204097 (EW Pepper Ltd)</p>

Policy CC/NZ: Net zero carbon new buildings

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was strong support for the policy from residents and parish councils, political groups, organisations such as the Cambridgeshire and Peterborough Integrated Care Board, the Passivhaus Trust and Carbon Neutral Cambridge and some developers and consultants. Notably East of England Ambulance service commented that EEASt recommend building all homes and commercial buildings to BREEAM standard or PASSIVHAUS, as this would provide significantly long-term environmental savings for residents who are more likely to be from the most deprived backgrounds or have limited disposable income.

Comments were made to suggest areas for clarification to the policy including in relation to the area metrics used to calculate space heating demand. There were also suggestions that schemes targeting compliance with certain construction methodologies such as Passivhaus should be deemed to be in compliance with the policy without the need for additional modelling.

Cambridge Past Present and Future called for the supporting information should reflect national targets and local authorities should estimate their carbon budget share. They also suggested the addition of battery storage to Part C of the policy and the need to clarify the practical implementation of energy offsetting including updates to the Planning Obligations SPD.

Concerns from some developers were raised as to the implementation of the policy with calls for further guidance and a need

for flexibility in application, particularly in relation to energy use intensity figures for some types of non residential development with high energy demands, such as research and development and biotechnology uses. There were calls for a phased transition for policy implementation to ensure a steady build-up of skills for delivering higher standards as well as a consistent technical framework approach to maintain consistency in building performance assessment.

Concerns are raised about the requirement for whole life carbon assessment, for which there is no support in the NPPF, noting that these are onerous assessments and there can be significant inconsistencies in approach across assessments

Some in the house building industry objected to the policy on the grounds that it is not needed on the basis of the Future Homes Standard, would not be viable and was not technically feasible and questioned whether the policy was supported by appropriate evidence. Some argued that proposals in the draft NPPF (PM13) meant that such policies could not be implemented by local planning authorities.

There was a suggestion that escalating targets over the plan period could accommodate technological advancements, providing clarity on development costs over time.

Other concerns included that requiring net zero operational emissions at the shell and core stage is impractical without knowledge of future end users and operational profiles, and that requirements of the policy would lead to overly simple building designs in order to achieve the operational energy metrics required by the policy.

With regards to embodied carbon there were calls for the policy to explicitly require the demonstration of lean design and require demonstration of optioneering having taken place during design. Another comment challenged the approach, and said the plan should follow national regulatory requirements.

A number of respondents called for the calculation of transport related emissions both before and after development as well as

the calculation of carbon emissions from infrastructure proposals.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Regarding calls for clarification on some elements of the policy and guidance on implementation, a number of changes have been made to the policy have been made including clarification of the area metric used for the space heating demand and energy use intensity calculation, which is Gross Internal Area. Support for the inclusion of battery storage to help maximise the use of onsite energy generation has also been added to Part C of the policy. To provide further clarification on the implementation of the policy, an addendum to the Climate Change topic paper has been prepared to provide additional guidance on how the energy metrics should be calculated, guidance on how the policy will be applied in situations where full compliance with the policy targets cannot be met, for example for building types with very large energy demands, and guidance on elements including the implementation of the energy offset mechanism in cases where this requirement is triggered. Further technical guidance notes will be prepared to aid the implementation of the policy and consideration is also being given to developing a route for compliance using SAP (or the Home Energy Model once adopted for those schemes not able to utilise PHPP, CIBSE TM54 or NABERS modelling. This approach is similar to that already being implemented to support the Central Lincolnshire Local Plan.

In some cases, schemes being delivered to specific construction standards will be deemed to comply with the requirements of policy CC/NZ. Clarification on this point has been added to the supporting text of the policy alongside details of the evidence that would need to be submitted for this approach to be taken.

Regarding the concerns raised by the Home Builders Federation regarding the requirement for Whole Life Carbon

Assessment, it is recognised that such assessments do require the use of specialist software and consultants, access to which is not always available to smaller scale development. As such the policy has been amended, introducing a threshold at which a Whole Life Carbon Assessment should be undertaken, which for homes is set at 100 units and 10,000 sqm of non-residential floorspace. Below this, it will still be important for schemes to look to reduce embodied carbon through lean design, choice of materials and material efficiency, reference to which has been added to the policy in response to representations, and measures to address this should be demonstrated through the Sustainability Statement. Further guidance on reducing embodied carbon and Whole Life Carbon Assessment will be provided within a future technical note that will sit alongside the Local Plan on adoption and support implementation of the policy.

With regards to the objections raised by developers that the policy is not justified in light of the Future Homes Standard, and not supported by evidence of viability and technical feasibility, policy CC/NZ is supported by a full suite of evidence prepared by Bioregional, Etude and Currie and Brown. This includes technical feasibility and modelling and a range of development types and an assessment of viability, assessing the costs of achieving the requirements of the policy as an extra over cost on top of Part L Compliance (updated in 2025 to account for the changes made by Part L 2021), which has been fed into the wider Local Plan evidence base. The requirements of the policy are both technically feasible and viable.

A number of respondents suggested that setting metrics for net zero carbon is not a role for local planning authorities and should be left to the Future Homes Standard (FHS). While representing a significant step forward in energy performance standards for new homes, it is important to note that the FHS does not set a requirement for net zero carbon operational emissions, unlike Greater Cambridge's proposed Policy CC/NZ. Instead, the FHS seeks to ensure that new homes (and non-residential buildings) have low carbon, gas-free heating and slightly improved levels of energy efficiency, becoming net zero carbon in use once the electricity grid is fully decarbonised. Carbon budgets analysis carried out to support the emerging local plan has concluded that if Greater Cambridge was to rely on the Future Homes Standard alone, the areas carbon budget

available for all housing, derived from the national UK carbon budgets, would be exceeded meaning that we would not be able to contribute our share towards the national carbon budgets needed to meet the legally binding target of net zero by 2050. It is only via the application of the energy based metrics and onsite renewable energy generation requirements set out in policy CC/NZ that true net zero carbon housing can be delivered in Greater Cambridge.

Regarding the draft NPPF and the proposals set out in PM13 regarding stopping local planning authorities from setting standards for new homes, it must be noted that at the time of writing, the proposals in the draft NPPF were only draft proposals. It is also noted that the most recent draft NPPF, published for consultation in December 2025, sought views on ending the ability of local planning authorities to set standards for energy efficiency in new homes that go beyond Building Regulations requirements (and on dissuading the setting of any other numerical targets that cover any matters that are addressed by regulation). While the outcome of this consultation is awaited, the Councils' position aligns with the open legal advice published by Essex County Council, which notes that while the NPPF is policy guidance to which regard must be had during plan-making, deviation from it can be justified so long as there is clear evidence that demonstrates the reason for doing so and the viability of the proposed policies. As set out in the 2025 Climate Change Topic Paper, the significant evidence base for Policy CC/NZ, which includes viability assessment, technical feasibility and carbon budget analysis, provides the justification for this departure from the NPPF.

With regards to the calls for a phased approach to targets, this approach would still hamper Greater Cambridge's ability to contribute its fair share towards meeting national carbon budgets. The approach set out in policy CC/NZ has been subject to technical feasibility work and viability assessment all of which demonstrates that these requirements are achievable now. It should also be noted that these requirements are in line with requirements set out in other adopted Local Plans which are already being successfully implemented including in Central Lincolnshire, Cornwall and Bath and North East Somerset.

Concerns were raised that it would be difficult to apply the requirements of the policy to shell and core schemes where the precise end user is not known. However, the general use class of schemes will be known, so the recommended approach would be for modelling to be undertaken using the closest possible use class allowed for in the energy modelling software e.g. TM54. Where considered necessary, a planning condition could then be applied to require the submission of more accurate modelling once the final end user is known.

With regards to concerns that the application of the policy would lead to an over simplification of building design due to stringent performance criteria affecting design elements like elevational design and fenestration, the technical feasibility work undertaken to support the development of the policy used existing permitted housing schemes to model the achievement of the policy requirements, schemes that included elements such as former windows. While it is recognised that simpler building forms will make compliance with the policy simpler to achieve, it is not necessary and as such we would dispute claims that the policy will lead to homogenised architectural forms.

Tables of representations:

Support for the Policy Approach and Requirements

Summary of issues raised in comments	Comments highlighting this issue
Comments expressing support for the policy approach.	201395 (Gamlingay PC), 204054 (B Young), 205515 (BCN Wildlife Trust), 201166 (M Clarke), 202905 (Carbon Neutral Cambridge), 203214 (P Tribble),

	<p>203644 (Passivhaus Trust), 203665 (Cambridge Green Party), 204240 (CIP), 204753 (Mothers CAN Cambridge), 205118 (NHS Cambridgeshire and Peterborough Integrated Care Board), 201379 (Gamlingay PC), 201405 (M Rokoszak), 202742 (A Bragg), 201563 (Stapleford PC), 204240 (Carter Jonas on behalf of CIP), 204458 (Max Fordham), 205127(D Stoughton), 203323 (N Ellis), 203429 (S Ashworth), 201406 (M. Rokoszak), 210915 (Great Shelford Parish Council)</p>
<p>Welcome extra to Building Regs. Lean Design and the Circular Economy.</p>	<p>202184 (R Lambert)</p>
<p>Fully support policies that promote carbon neutral development and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. We would highlight that NHS property could benefit from carbon/energy offset funds supporting the NHS to reach the goal of becoming the world's first net zero healthcare provider.</p>	<p>205118 (NHS Cambridgeshire and Peterborough Integrated Care Board)</p>

Support the requirement of draft Policy CC/NZ Part 2.	210285 (Vistry Group)
The policies for embodied carbon are supported as they are not unduly prescriptive.	211540 (Martin Grant Land Limited)

Comments on the Policy Approach and Requirements

Monitoring and enforcement of the policy is essential. The issue of quality control needs to be raised to ensure figures are from a reputable source.	202844 (H Cook), 203013 (M Cleminson), 203271 (Horseheath PC), 207420 (A Copping)
The policy should explicitly require the demonstration of lean design and require demonstration of optioneering having taken place during design.	204753 (Mothers CAN Cambridge)
Transport carbon (lifetime transport emissions) should be included within net zero assessments not just building emissions. Operational carbon emissions must consider vehicle movement emissions generated by developments.	203144 (CPPF), 205216 (Dr Thomas), 207524 (Dr Lawrence), 205127 (D Stoughton), 207420 (A Copping)
Need to recognise biodiversity and climate crisis and need to adapt to climate change and address urban heat island and mitigate effects of new structures.	202454 (J Neal)

Home working has impacted on energy demand and EV charging has also changed energy demand in residential and non-residential properties, energy generation should be local.	201926 (R Parteger)
Policy should explicitly encourage and support the use of low carbon materials such as timber and rendered surfaces.	202905 (Carbon Neutral Cambridge)
Policy should take account of the evolution of sustainable housing and energy technology in a way that enables the standards to rise in the future.	203214 (P Tribble)
With regards to assessing building performance must be within a consistent technical framework approach to maintain consistency in building performance assessment.	205174 (Home Builders Federation)
Rural Active travel routes should be bridleway to include equestrians.	203944 (S Rogers)
If policy is deliverable, consistency will be required across other policies in the plan notably design as the approach will inevitably lead to less variety in built form in order to reduce the surface area of the building.	205174 (Home Builders Federation)
The Passivhaus Trust advocate for the use of the Passivhaus standard as a reliable method to ensure projects meet the performance outcomes set out in the Local Plan, noting the risk of performance gaps without such quality assurance. Projects targeting Passivhaus certification should be considered as 'deemed to comply' with Local Plan requirements, similar to proposed practices in Scotland.	203644 (Passivhaus Trust), 204753 (Mothers CAN Cambridge)
EEAST recommend building all homes and commercial buildings to BREEAM standard or PASSIVHAUS. As a minimum EEAST recommends the proposed	210327 (East England Ambulance Service NHS Trust)

<p>40% affordable/social housing are built to Passivhaus or BREEAM Excellent standards, as this would provide significantly long-term environmental savings for residents who are more likely to be from the most deprived backgrounds or have limited disposable income.</p>	
<p>Calls for a phased transition for policy implementation to ensure a steady build-up of skills for delivering higher standards.</p>	<p>205174 (Home Builders Federation), 208964 (Persimmon Homes East Midlands)</p>
<p>Encouraging alignment with the UK Zero Carbon Buildings Standard is meaningless.</p>	<p>202614 (C Pointon)</p>
<p>A policy is needed for transport infrastructure to achieve net negative cumulative carbon emissions by 2050.</p> <p>The plan should have binding targets for the proportion of journeys walked/cycled and by public transport. Major developments should have targets for mode share and permeability.</p>	<p>203144 (CPPF), 207524 (Dr Lawrence)</p>
<p>Comments question whether the policy is not needed as the Future Homes Standard is being progressed by Government and they will change legislation to prevent local authorities from setting standards above Building Regulations.</p> <p>Need for careful consideration of the outcomes of the draft NPPF consultation and in particular PM13.</p>	<p>205174 (Home Builders Federation), 204845 (Vistry Group), 207442 (Bidwells on behalf of Pioneer Group Ltd), 208272, 211541 (Martin Grant Land Limited), 208289 (Imperial War Museum),</p>

	208314 (Churchill Retirement Living with McCarthy and Stone) 210282 (Vistry Group),
<p>The council should consider deleting the policy and aligning the Council's requirement for carbon neutral development with those of Government, including embodied carbon, as new development will often be far more sustainable in many circumstances including building fabric by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site.</p>	208314 (Churchill Retirement Living with McCarthy and Stone)
<p>Strongly object. Whilst the UK's legally binding requirement to achieve net zero carbon by 2050 is recognised; it is considered that the proposed requirement for new development to achieve net zero operational carbon emissions far exceeds current building regulations requirements.</p> <p>It should be recognised that the UK is currently in the process of transitioning towards net zero carbon, through the implementation of the Future Homes Standard. Written Ministerial Statement made in December 2023 established that any planning policies which propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not provide a well-reasoned and robustly costed rationale which ensures that development remains viable</p>	211281 (Woolsington One Ltd)

Comments Regarding Space Heating and EUI Targets

Summary of issues raised in comments	Comments highlighting this issue
Need clarity on the target (explicitly state the area metric required) as different reporting methods (PHPP, SAP, IES) yield varying Energy Use Intensity results, largely dependent on area metrics and thermal bridging.	204054 (B Young), 204753 (Mothers CAN Cambridge)
Suggestion that escalating targets over the plan period could accommodate technological advancements, providing clarity on development costs over time.	203048 (Bidwells on behalf of Barrat Homes)
Energy consumption targets much include a standard reference to room temperature for reliable measurability.	203144 (CPPF)
Carbon budgets for construction should align with national targets, include battery storage and account for embodied carbon including setting of targets.	203144 (CPPF)
Emissions associated with heating and cooling should be included.	207524 (Dr Lawrence)
It should be noted that it is not clear what the targets are exactly unless the modelling methodology is more clearly defined. For example – PHPP reports EUI differently than SAP or IES does unless a conversion is added. Please explicitly state the area metric required. Passivhaus certification should be accepted as compliance with the policy without additional modelling to limit conflict and cost to developers	204458 (Max Fordham)

<p>The energy metrics are inconsistent with the Written Ministerial Statement and the Planning and Energy Act. Any local standard should be expressed as a percentage uplift on the Target Emission Rate.</p>	<p>205174 (Home Builders Federation)</p>
<p>Comments highlighting that net zero operational emissions at the shell and core stage is impractical without knowledge of future end users and operational profiles. Requirements could deter occupier delivery or investment due to the impractical obligations imposed. Concerns are raised regarding the reliance on CIBSE TM54 modelling, which overlaps with existing energy performance assessments in BREEAM requirements, potentially reducing certainty without providing significant environmental benefits. The respondent advocates for a proportionate, evidence-based approach that considers realistic delivery stages and aligns with existing standards.</p>	<p>204314 (Tritax Big Box Development)</p>
<p>Comments highlighting the approach is unsupported by sufficient evidence, failing to demonstrate that proposed performance thresholds are achievable across various building types and site contexts</p>	<p>204548 (Redrow South Midlands), 203352 (BMR Granta Park PropCo Limited),</p>

Comments Raising Suggestions about the Policy Wording

<p>Summary of issues raised in comments</p>	<p>Comments highlighting this issue</p>
<p>Some points of the policy require strengthening particularly point 8 which merely requires 'demonstrating action'. The policy should set clear expectations for prioritising recycled and low carbon materials, apply to retrofit as well as new</p>	<p>203665 (Cambridge Green Party), 201744 (J Johnson), 203013 (M Cleminson)</p>

<p>buildings and include standards for buildings lifetime. Amendments to the wording are suggested.</p> <p>Critical of use of language like where appropriate and encourage.</p>	
<p>Supporting information should reflect national targets and local authorities should estimate their carbon budget share.</p>	203144 (CPPF)
<p>Amendments required to ensure greater flexibility of application of policy.</p> <p>The space heating targets may be challenging in certain circumstances, and flexibility is therefore needed to reflect built form, design, urban design, placemaking and viability principles. Similarly, the EUI targets need to be adaptable to ensure they can respond appropriately to differing site contexts and design constraints. Policy should be amended to be proportionate to the size of scheme to which it is being applied.</p>	203164 (ESCO Prospect), 205085 (Lichfields on behalf of Lolworth Developments Limited), 204104 (EW Pepper Ltd), 208267 (Martin Grant Land Limited), 208304 (Girton College), 210286 (Vistry Group)
<p>Comments seeking clarification on the use of 'maximise' for the draft Policy wording which relates to generating on-site renewable energy (Part C, bullet no.5). This should be quantified.</p>	211755 (Urban & Civic)
<p>Question whether the policy should read that 'new buildings should be limited in design to use 'less than' 20kWh per m2 per year.</p>	201379 (Gamlingay PC)

<p>Part 2 and onsite renewable energy may not be achievable for buildings of more than 2 floors and should be updated to read “Proposals must seek to maximise opportunities to generate on-site renewable energy to serve the development”.</p>	<p>204012 (ARU)</p>
<p>Part C: the renewable-energy provision wording “where possible” should be interpreted flexibly, and the policy should be amended to read: "Proposals should maximise the deployment of renewable energy where appropriate / feasible and viable".</p>	<p>208252 (Kings College), 209748 (Endurance Estates), 208291 (Imperial War Museum), 210286 (Vistry Group)</p>
<p>Part C should mandate battery storage alongside onsite energy generation to manage electricity demand effectively.</p>	<p>203144 (CPPF)</p>
<p>Part D also requires new development to calculate whole life carbon emissions through a nationally recognised whole life carbon assessment tool and demonstrate actions to reduce embodied carbon where possible. The College therefore requests that the following text be inserted into this draft Policy: "The Whole Life Carbon Assessment undertaken should be proportionate to the nature and scale of the application".</p>	<p>208252 (Kings College)</p>
<p>There is no mention in the draft Policy of the need for flexibility where sites are impacted by heritage designations, which of course significantly impact the College. We therefore suggest that the following wording should be inserted into the draft Policy: “It is recognised that buildings impacted by heritage</p>	<p>208251 (Kings College)</p>

<p>designations may have specific constraints and this will be considered in the context of the targets within this Policy.”</p>	
<p>Objection raised to the word “must” at CC/DC(1) as this creates a requirement leaving little to no discretion for decision makers. The word “should” would be more appropriate, setting out an expectation unless justified otherwise, which aids decision makers in reaching a balanced judgement. The requirements regarding these matters are addressed through the Building Regulations and planning policies should not duplicate this legislation.</p>	<p>204469 (Bellway Strategic)</p>
<p>The requirement to follow a hierarchical approach of reduction heat and power demand, however, raises concern with flexibility on the subsequent requirement to supply all energy demand through on site energy generation, as there may be some instances where this is not possible and/or an alternative off-site solution may be preferable. Amendments to the wording should be introduced to allow flexibility, where it can be justified: “Where appropriate new development must achieve net zero operational emissions by following a hierarchical approach of reducing heat and power demand then supplying all energy demand through onsite energy generation, unless, satisfactorily justified otherwise”</p>	<p>205085 (Lichfields on behalf of Lolworth Developments Limited)</p>
<p>Overall the policy aligns with the ARU Design Principles document, but some parts of the policy require clarification. Part B and requirements for Higher Education Teaching Facilities requires clarification within the supporting text so</p>	<p>204012 (ARU)</p>

<p>that is based on the sub-typology that best applies to different extents of the proposed floorspace.</p>	
<p>Concerns are raised about the requirement for whole life carbon assessment, for which there is no support in the NPPF. These are onerous assessments and there can be significant inconsistencies in approach across assessments (noting that not all products will have an Environmental Product Declaration). This requirement should be deleted.</p>	<p>205174 (Home Builders Federation), 211757 (Urban & Civic)</p>
<p>Amend policy as follows:</p> <ol style="list-style-type: none"> 1. Introduce flexibility by replacing fixed space heating and EUI thresholds with performance targets “where technically feasible and demonstrated to be viable”, supported by site specific evidence. 2. Align targets with national policy, including the Future Homes Standard, and avoid imposing Passivhaus equivalent requirements unless justified by robust local evidence. 3. Allow compliance through multiple routes, not solely Passivhaus style modelling tools (e.g. TM54, PHPP), to accommodate a wider range of building types and construction approaches. 4. Remove the requirement for onsite renewable generation to meet all energy demand; instead require developments to maximise feasible onsite generation and supplement through local low carbon energy sources. 5. The proposed offsetting fund should be removed as it is beyond the remit of 	<p>204548 (Redrow South Midlands)</p>

<p>planning policy and should be left to the Building Regulations regime.</p> <p>6. Ensure whole plan viability testing is carried out, and the results shared and consulted upon to enable full review of the policies in that context. This would confirm that CC/NZ can be implemented without compromising housing delivery or affordable housing provision.</p> <p>7. Avoid duplication by clarifying how CC/NZ interacts with CC/SD, CC/IW, CC/DC and CC/CE, ensuring applicants only submit one coordinated set of climate related evidence.</p>	
<p>Comments highlighting the challenges for new dwellings to deploy sufficient renewable energy to meet all its energy demands on site, particularly given the substantial power requirement from Electric Vehicles (EV’).</p> <p>Recommendation for the draft policy to be amended to: “Proposals should maximise the deployment of renewable energy where feasible and viable.”</p>	210287 (Vistry Group)
<p>The current proposed policy ignores the fact that solar energy generation rarely matches energy demand at the time it is produced, therefore leading to excess energy generated that is not consumed on-site. The policy wording should suggest that this should be balanced over the course of a year for a net zero carbon development. It would not be reasonable to expect all schemes to provide at least all of their energy requirements on site and through renewable</p>	211537 (Martin Grant Land Limited)

resources, especially for speculative developments where the end user is not known. Different tenants will use energy in different ways.	

Comments Raising Concerns about the Policy and its Implementation

Summary of issues raised in comments	Comments highlighting this issue
Need to clarify the practical implementation of energy offsetting including updates to the Planning Obligations SPD.	203144 (CPPF)
Parts A and B of the policy include requirements that may not be enforceable, and the policy should clarify that these are hypothetical. Building Regulations requirements should suffice.	204509 (Abbey Properties)
Part D is inconsistent with national policy by proposing a tariff on all developments and would complicate the process due to the need for a Section 106 Agreement.	204509 (Abbey Properties)
The policy's approach to net zero is not aligned with national planning policy as net zero can be achieved by various means and properties will require backup power when renewable energy source are insufficient.	204509 (Abbey Properties)
Part D and local energy offsetting would seem to duplicate energy users funding the installation of renewable energy generation through their bills. Renewable energy procurement should be included within this policy as a route to achieve	204012 (ARU)

<p>net zero carbon buildings, as it is within the UK Net Zero Carbon Buildings Standard used for Part C of this policy.</p>	
<p>In relation to the “Energy Offset Fund” raise in Part D, concerns were raised that the policy does not give any detail with respect to the cost of the fund and therefore this part of the policy is unsound and not in accordance with Paragraph 59 of the NPPF, which requires local plan policies to be accompanied by up-to-date viability assessments. Contributions must also meet CIL/S106 legal tests.</p>	<p>208304 (Girton College), 208964 (Persimmon Homes East Midlands), 208987 (Barratt Homes Northampton), 210059 (Endurance Estates), 210288 (Vistry Group), 210594 (Imperial War Museum), 211538 (Martin Grant Land Limited), 211756 (Urban & Civic)</p>
<p>Policy imposes space-heating (15-20 kWh m⁻²) and EUI (35 kWh m⁻² yr⁻¹) targets equivalent to Passivhaus standards, which are financially and technically onerous; the draft should be amended or withdrawn, with a heritage-flexibility clause and targets aligned to construction year rather than a fixed 2030 benchmark.</p>	<p>208251 (Kings College), 208289 (Imperial War Museum), 210282 (Vistry Group), 211754 (Urban & Civic)</p>
<p>Part B is unenforceable as it is beyond the control of developers, with space heating being the only standardisable element. While a methodology can be required, the council cannot enforce actual in use performance outcomes as these will never fully align with design intent</p>	<p>203144 (CPPF), 211539 (Martin Grant Land Limited)</p>
<p>Concerns about the viability implications of policy requirements as it goes beyond national Building Regulations and Future Homes Standard for</p>	<p>203048 (Bidwells on behalf of Barrat Homes),</p>

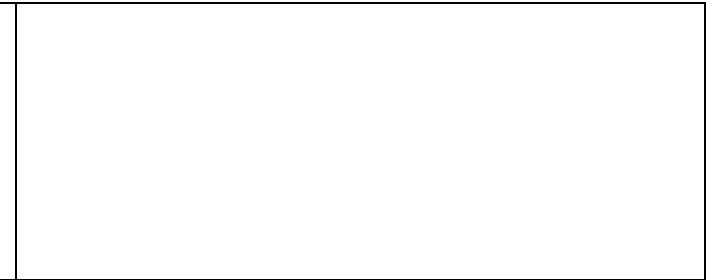
operational carbon and whole life carbon. The requirements would also conflict with NPPF PM13.1.

The cumulative impacts of the policy have not been accounted for, posing risks to housing viability, affordable housing delivery, and overall development rates. Onerous requirements have the potential to impact on housing affordability and delivery rates for new homes.

203381 (Bidwells on behalf of Babraham Research Campus)
204227 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure)
204248 (Bidwells on behalf of Bellway Strategic Land)
204473 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure)
204548 (Carter Jonas on behalf of Redrow South Midlands)
204738 (Bidwells on behalf of Vistry)
204770 (Carter Jones on behalf of Hill)
205041 (Savills UK on behalf of Endurance Estates),
205174 (Home Builders Federation),
204548 (Redrow South Midlands),
204104 (EW Pepper Ltd),
208267 (Martin Grant Land Limited),
208987 (Barratt Homes Northampton),
210059 (Endurance Estates),
210283 (Vistry Group),

	211753, 211754, 211757 (Urban & Civic)
Concerns that the proposed energy targets are not technically feasible for certain types of uses (e.g. life sciences laboratories) and that greater flexibility is needed.	203352 (BMR Granta Park PropCo Limited), 208290 (Imperial War Museum),
Concerns that the policy does not provide sufficient consideration for the unique nature of some historic buildings or heritage designations or other unique cases where gas supply may be necessary.	208290 (Imperial War Museum), 208304 (Girton College) 210284 (Vistry Group) 208251 (Kings College)
As the measures are not monitored, it will be unlikely to be followed.	202614 (C Pointon), 202844 (Dr Cook)
Support the principles of Policy CC/NZ but concerned that the proposed energy standards exceed the Future Homes Standard, effectively mandating Passivhaus performance. Risk of homogenised architectural forms due to stringent performance criteria affecting design elements like elevational design and fenestration. Practical issues related to procurement, buildability, and the construction supply chain are highlighted, including potential shortages of materials and skilled labour. Cost uplifts of 10-20% identified by the Future Homes Hub may not align with the Council's evidence base, necessitating further viability testing. Inflated costs could lead to delayed housing delivery or reduced affordable housing output, impacting overall housing viability. Emerging policy PM13 from the NPPF draft may render Policy CC/NZ inconsistent with national policy once adopted, limiting its weight in decision-making. While	204770 (Hill)

acknowledging that local planning authorities can set higher standards, the respondent argues that such policies must be justified and demonstrate maintained development viability. Policy does not align with the requirements of the 2023 Written Ministerial Statement, Planning – Local Energy Efficiency Standards Update and that the consequences have not been adequately tested.



Policy CC/WE: Water efficiency in new developments

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for a robust water efficiency policy that goes beyond Building Regulations from a range of bodies including the Environment Agency and individuals. Cambridge Water and Anglian Water supported the Plan's strategy to phase growth at new strategic sites to align with the delivery of new strategic water supply options. However, there were also objections from developers and landowners saying that the policy goes beyond national and industry guidance, can't be realistically delivered in the short term and needs more flexibility in the policy wording. There were comments that the requirements of the Shared Standards document produced by water stakeholders should be followed.

Concerns were raised about part 1 of the policy, which several respondents said puts responsibility on the developer to demonstrate that there will be adequate water supply rather than water companies who have legal obligations under the Water Industry Act 1991.

There were a number of comments that the 90-100 l/p/d level for smaller residential schemes should not be a range but should be 90l/p/d as an achievable level and to prevent schemes actually building to 100 l/p/d. There was some concern that the five BREEAM credits is challenging and often unfeasible and would necessitate commercial developments to engage a qualified BREEAM assessor.

The Environment Agency recommended a section dealing specifically with data centres as an emerging sector with high water consumption. They also made detailed comments on the Water Supply evidence that was published to accompany the Draft Local Plan.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach and phasing of growth in the plan to align with new strategic water supply are noted.

Concerns that the policy is setting unreasonable requirements on developers to produce evidence have been addressed by removing paragraph 1 of the policy so that the policy is focused on achieving high water efficiency design levels in new development.

Evidence in the Shared Standards in Water Efficiency for Local Plans (2025), Future Homes Hub Water Ready report (2024), Water Reuse in New Housing report (2024), and the Greater Cambridge Local Plan Viability Assessment (2026) has shown that the standards proposed are achievable and viable. They are supported by water stakeholders. Given the water scarcity position in Greater Cambridge, and the development aspirations for the area, it is vital that water is used efficiently.

In relation to comments saying that the Shared Standards should be followed, the Councils considered the 85 l/p/d water efficiency level recommended in the Shared Standards for all housing but considered that it may be hard to achieve this level purely with fixtures and fittings and that further work is needed to test the specifications suggested. As a result the policy

requires a lower level of 80 l/p/d for large developments over 100 houses where evidence has shown that community scale stormwater reuse is more cost effective and could be implemented in addition to water efficient fixtures and fittings. A level of 90 l/p/d is required for developments below 100 houses which can be achieved through water efficient fixtures and fittings. The previous range given for developments below 100 houses of 90-100 l/p/d has been replaced with the more water efficient 90 l/p/d in order that development is designed to be as water efficient as possible.

In relation to objections to the levels of water efficiency proposed for non-household development, BREEAM is an industry standard certification scheme to assess the environmental performance of buildings. This standard is in the current adopted Local Plan policies and has been practical to use and it is also used in the Shared Standards. As such it seems an appropriate tool. Additional wording has been added to show that the equivalent reduction in water use in non-household developments would also be acceptable as an alternative to BREEAM. The wording 'unless demonstrated impracticable' allows for some flexibility depending upon the exact circumstances, but the onus is on the developer to demonstrate within the Sustainability Statement the reasons why the full BREEAM credits required in the policy would not be achievable.

It is recognised that data centres have a high water consumption and an additional section has been added to the policy to ensure they are designed to be as water efficient as possible.

Prioritising reuse of rainwater for outdoor space irrigation is an appropriate and achievable response to water scarcity issues facing the area.

Environment Agency comments on the Water Supply Evidence Report have been reviewed by the consultants who produced the study. An Addendum Report has been published, responding to the comments, and updating the assessment to take account of

updated development trajectories, including updating growth anticipated in the Huntingdonshire part of the water resource zone. A Statement of Common Ground has also been agreed with the Environment Agency and Cambridge Water on this issue.

Table of representations:

General policy comments

Summary of issues raised in comments	Comments highlighting this issue
Support for a robust water efficiency policy.	202619 (C Pointon), Cambridge City Council Liberal Democrat Group (202908), 204475 (Max Fordham), 204764 (Mothers CAN Cambridge), 203018 (M Cleminson), 209160 (Anglian Water Services), 202468 (Dr J Neal), 211133, 211141 (Environment Agency), 208305 (Girton College),

<p>The policy is generally supported, but the requirements sought should be proportionate to the development.</p>	<p>203168 (ESCO Prospect)</p>
<p>Strongly support parts 1, 4 and 5 of the policy</p>	<p>203667 (Cambridge Green Party), 205210 (Cam Valley Forum)</p>
<p>It is noted that Greater Cambridge faces significant challenges in respect of water scarcity and provision of wastewater recycling facilities. We share your concerns about this matter and consider it to be another area where there is scope for joint action and collaboration across the Ox Cam corridor geography.</p>	<p>208229 (Bedford Borough Council)</p>
<p>As identified by this section of the draft Local Plan, Anglian Water is already working with Cambridge Water to deliver strategic water supply options to address the water resource needs of the area, and enable more water to remain in the environment, to protect internationally important chalk stream habitats.</p> <p>We support the Plan's strategy to phase growth at new strategic sites to align with the delivery of strategic water supply options. It is important that these water supply options are also underpinned by demand management solutions, and tighter water efficiency standards for new development.</p> <p>Opportunities for integrated water management, including reuse, are significant factors for consideration in new development proposals coming forward, and align with the measures the Cambridge Water Scarcity Group has been developing</p>	<p>209160 (Anglian Water Services)</p>
<p>Encourage GCSP to commit to monitoring reports that give periodic updates on the policy's effective implementation.</p>	<p>211133 (Environment Agency)</p>

<p>The final Water Resources Management Plan (WRMP) for 2025-2050 has been published, with reviews every 5 years to adapt to changes. Demand forecasts for water are based on current local plans and strategic developments, with significant reductions in abstractions planned for 2033 and 2037. Increased growth beyond adopted plans may raise demand above forecasts, necessitating additional supply and demand options to maintain water supplies. Non-household connections are restricted to below 20m³/day, and there is advocacy for domestic water consumption standards of 110 litres per person minimum.</p> <p>The growth forecast to 2032 aligns with previous plans, providing stability, while growth from 2032-2045 is elevated, with strategic sites beyond 2045 being considered. The Grafham transfer will help with supply concerns, but additional growth is challenging until the Fens Reservoir is operational.</p> <p>Certainty on growth proposals is needed for the revised draft WRMP due in 2028, with potential new water supply options to be developed if cumulative growth requires it. Significant water resources infrastructure has long lead times and must be considered in a regional context.</p>	201578 (Cambridge Water)
<p>All of the potable water supplying Greater Cambridge is currently obtained from nearly 100% abstraction of chalk aquifers, any increase in development has the potential to result in an adverse effect on Habitats sites susceptible to impacts from changes in water quantity in-combination with development in areas outside of the GCLP area. It will be vital for new developments to comply with the water efficiency measures, both until the new supply side measures come online, and continuing into the future to make efficient use of this constrained resource. Policy CC/WE should be amended to</p>	208453 (The National Trust (MEE Planning Team))

require all new development to provide a project level assessment of water quantity to demonstrate that it would not result adversely affect water sensitive designated sites.	
Object to Policy CC/WE as it exceeds national and industry guidance by mandating rainwater or greywater harvesting on all major developments, which may not always be appropriate or deliverable.	204110 (EW Pepper Ltd), 204748 (Vistry), 204327 (Tritax Big Box Developments), 204484 (Bellway Strategic Land), 211759 (Urban & Civic)
Object to policy as it exceeds what can realistically be delivered in the near term, lacks a credible evidence base, is unduly onerous and imposes requirements beyond national policy without demonstrating feasibility or viability.	130695 (Redrow South Midlands), 205044 (Endurance Estates)
The scale of development is unrealistic in this drought area with water supply unconfirmed; particularly commercial labs/data & AI centres.	205649 (S Buckingham), 207498 (FECRA)
Need for flexibility in the policy wording. The use of 'must' in the policy creates a mandatory requirement, limiting discretion for decision makers; 'should' would allow for a more balanced judgement.	204110 (EW Pepper Ltd), 204748 (Vistry), 204249 ((Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204327 (Tritax Big Box Developments), 204484

	(Bellway Strategic Land), 205044 (Endurance Estates)
The policy goes beyond national and industry guidance. Recent case law confirms that, while local planning authorities may depart from national policy or guidance where this is justified by local circumstances, such departure is not expected as a matter of course and cannot be assumed to be appropriate in the absence of robust evidence.	204327 (Tritax Big Box Developments)
The policy duplicates matters addressed in other policies (CC/SD, CC/IW, CC/NZ), creating uncertainty and undermining clarity, which is essential for soundness.	130695 (Redrow South Midlands)
Councils will need to ensure that an appropriate balance is struck between the ambition of the policy and the deliverability of development, supported by robust viability evidence.	210291 (Vistry Group)

Comments on requirement to demonstrate water supply availability

Summary of issues raised in comments	Comments highlighting this issue
Part 1 of the policy puts responsibility on the developer to demonstrate that there will be adequate water supply rather than the water companies who have legal obligations under the Water Industry Act 1991. It is inappropriate to ask developers to evidence something that they are not legally responsible for and is out of their control. Request deletion. Suggested amendment by CIP 'All development proposals (with the exception of householder applications) are required to undertake pre-application engagement with the relevant water provider to confirm water supply availability to serve the development.'	204777 (Hill), 204271 (Cambridge Investment Partnership), 205195 (Home Builders Federation), 211758 (Urban & Civic)

Part 1 of the policy is in conflict with paragraph 20 of the NPPF as the supply of water is not normally a matter for individual planning applications and would normally be addressed through authorities' strategic policies. Part 1 should not therefore be a requirement for applicants and should be deleted.	202780 (Martin Grant Land Limited)
To show that there is an adequate water supply for development will the Cambridge Water Water Resources Management Plan be accepted in determinations?	202447 (University of Cambridge)
All development proposals (with the exception of householder applications) must demonstrate that there will be an adequate water supply available to serve the development AND that any increase in water demand will not damage any chalk streams or slow the improvement in chalk stream WFD status. Add 'without harm to existing chalk stream levels'.	202437 (R MacDonald), 202494 (H Brown)
Part 1: To date, Environment Agency's concern re insufficient water has been ignored, so this statement is unreliable.	2025649 (S Buckingham)
Part 1: Encourage wording is changed from 'adequate' to 'sufficient and sustainable'.	211133 (Environment Agency)
It will be vital for new developments to comply with the water efficiency measures, both until the new supply side measures come online, and continuing into the future to make efficient use of this constrained resource. Policy CC/WE should be amended to require all new development to provide a project level assessment of water quantity to demonstrate that it would not result adversely affect water sensitive designated sites.	208453 (National Trust)

Comments on Water efficiency levels - Residential

Summary of issues raised in comments	Comments highlighting this issue
Part 2a. Support for 80 l/p/d for residential schemes over 100 homes to address the issue of serious water stress.	201659 (Hunts DC), 204993 (Uttlesford DC), 211134 (Environment Agency), 207617 (Natural England)
The Climate Change Topic Paper (2025) covers the reasoning behind the policy decisions and along with paragraph 6.39 explains why the 85 litres/person/day recommended by the Shared Standards in Water Efficiency for Local Plans (2025) has not currently been included for developments of less than 100 homes.	207617 (Natural England)
Part 2a. Recommend that GCSP reviews 2021 evidence base in light of the Shared Standards for Water Efficiency, and to include this within the policy justification to improve soundness at examination.	211134 (Environment Agency)
Part 2a, suggest 'subject to amendments to relevant water legislation' be amended to 'subject to amendments to relevant water re-use policy'. Clarify what the implications would be on the policy's effectiveness if this reform does not occur.	211135 (Environment Agency)
As a partner to the Shared Standards, we would encourage the policy to go further in respect of developments of less than 100 dwellings, to use a water efficiency standard within the range set by the Shared Standards i.e. 85-95 l/p/d. It is noted that other emerging local plans across the WRE region are bringing forward tighter water efficiency standards within this range, dependent on viability. We would direct the GCSPS to review the recent Inspector's Report on the Uttlesford District Council Local Plan,	210199 (Anglian Water Services)

where the tighter standard of 90 l/p/d for all new residential development has been demonstrated to be sound.	
Part 2a of the policy (80 l/p/d) should also apply to householder applications and the refurbishment or change of use of existing buildings.	201564 (Stapleford PC), 210916 (Great Shelford PC)
The 80 l/p/d standard should apply to all new residential development regardless of number of dwellings	203667 (Cambridge Green Party), 205649 (S Buckingham), 205210 (Cam Valley Forum), 201745 (J Johnson)
Part 2a of the policy relating to water reuse or recycling is not justified as it is subject to amendments to relevant water legislation and can only be included if these changes are made. Delete part 2a or re-word. Paragraph 4.31 also needs amending to reflect this.	(A Brand), 130695 (Redrow South Midlands), 204621 (Abbey Properties Cambridgeshire Limited)
Water efficiency level of 80 l/p/d for developments of 100 or more dwellings is considered onerous and difficult to implement, not justified and not in line with Building Regulations. Higher costs may impact viability of developments.	204777 (Hill), 204271 (Cambridge Investment Partnership), 204259 (Bellway Strategic Land), 130695 (Redrow South Midlands), 205044 (Endurance Estates),

	<p>210289 (Vistry Group), 211234 (Living Space Housing) 208268 (Martin Grant Land) 211459 (Hayfields Homes Construction), 211759 (Urban & Civic)</p>
<p>Mandatory 80 l/p/d standard for all new residential development is not justified. As there is an existing national standard for such areas then the only sound approach is to apply that standard, which remains 110 litres per person per day.</p>	<p>208965 (Persimmon Homes East Midlands)</p>
<p>The proposed restriction on water use to 80 litres per person per day (LPPPD) in developments of 100+ dwellings, and 90-100 litres per person per day in developments of less than 100 dwellings is unduly onerous and is not consistent with national policy requirements. By Building Regulation standards, the current restriction is 125 litres per person per day (LPPPD) with an optional uplift / reduction to 110 litres per person per day. The 'Water Ready' report published earlier this year by the Future Homes Hub outlines a framework for new homes to achieve 90 LPPPD by 2035.</p>	<p>211234 (Living Space Housing), 211220 (Terra Strategic), 211264 (Terra Strategic)</p>
<p>The Future Homes Hub – Water Ready report should be used as a framework for water-stressed areas with transitional periods, such as dual supply pipework, rather than mandating on-site water recycling systems, which could pose risks.</p>	<p>204777 (Hill)</p>

<p>Upgrading existing local housing stock water related fixtures & fittings, through the incumbent water utility companies, using water-offsetting funds, offers a more equitable and lower-risk route to achieving water efficiency gains.</p>	<p>204777 (Hill)</p>
<p>A balanced, phased approach that considers flexibility around targets exceeding building regulation requirements is requested to avoid undermining deliverability and affordability.</p>	<p>204777 (Hill)</p>
<p>The policy needs to be clear on the l/p/d domestic figure where non-potable sources are unavailable. 80 l/p/d is far tighter than the government target of 100 l/p/d for water stressed areas.</p>	<p>202447 (University of Cambridge)</p>
<p>It is unclear why the policy imposes stricter internal water-use requirements for developments over 100 dwellings. Internal water use is influenced more by occupant behaviour and dwelling specifications than by the scale of development. The policy should either apply a consistent, evidence-based standard across all residential developments or provide clear justification explaining why a higher requirement is appropriate only for larger schemes.</p>	<p>204110 (EW Pepper Ltd), 204748 (Vistry), 204249 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204259 (Bellway Strategic Land), 204484 (Bellway Strategic Land), 204556 (Redrow South Midlands), 204259 (Bellway Strategic Land)</p>

<p>100 litres/person/day for all dwellings where practical and viable is more achievable.</p>	<p>204748 (Vistry), 204484 (Bellway Strategic Land), 210292 (Vistry Group)</p>
<p>We question how it is justified to limit people's water use by reason that they reside on a larger development site, which, given the high percentage of large-scale sites proposed for allocation, will not be a choice for many people. We would suggest that the water usage limit of between 90 to 100 litres per day applies to all residential developments, regardless of the size of site.</p>	<p>208352 (T Elbourn)</p>
<p>HBF does not support 80 lppd noting the potential legal implications and risks of cross-contamination associated with water recycling systems, suggesting the council should not mandate given that there are no national standards.</p>	<p>205195 (Home Builders Federation)</p>
<p>If a lower water standard is implemented, it should be averaged across the site to allow flexibility for homes with varying water usage.</p>	<p>205195 (Home Builders Federation)</p>
<p>Part 2b of the policy for smaller residential schemes should not be a range but should be 90 l/p/d as an achievable level. At the moment it is no different to saying less than 100 l/p/d.</p>	<p>201659 (Hunts DC), Cambridge City Council Liberal Democrat Group (202908), 204475 (Max Fordham), 204764 (Mothers CAN Cambridge)</p>
<p>100 l/p/d is not strict enough. Dual pipes must ensure that loo flushes do not use potable water. There needs to be a change in the law.</p>	<p>202188 (R Lambert)</p>

Assumptions being used to achieve these targets are not clear, including home working and irrigation of gardens and vegetable growing areas.	201927 (R Pargeter)
The proposed water efficiency standards far exceed building regulations. The Government's proposed revisions to the Water Efficiency Standard are being undertaken in consultation with DEFRA and has been informed by independent research regarding the infrastructure that needs to be in place to enable the tighter water efficiency standards that the Government is consulting on to be achieved. It is notable that the Government's target is to achieve a reduction in water use to 110 litres/person/per day by 2050. In light of this national target, it is unclear how the Council considers that the achievement of a water efficiency target 30 litres below the proposed national 2050 target will be achievable. The evidence base accompanying the Draft Plan does not address the viability, of feasibility of achieving these enhanced standards.	211282 (Woolsington One Ltd)
The per-capita water consumption calculation (80 L/person/day) does not accommodate Managed Aquifer Recharge and could divert rainwater from natural recharge.	209042 (Marshall Group Properties)

Comments on Water efficiency levels – Non-residential

Summary of issues raised in comments	Comments highlighting this issue
Part 2c should be strengthened to reflect the recommended policy wording in the Shared Standards.	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)

Support for water reuse or recycling for non-residential major development sites, which must be provided in the Sustainability Statement.	201986 (Swavesey PC)
Support for requiring a full 5 credits under the Wat01 heading in the BREEAM assessment for non-residential development, but the policy should include 'unless demonstrated not practicable' to allow for flexibility in cases of refurbishment on constrained urban sites.	202447 (University of Cambridge)
Support Part 2d and that the efficiency of process water use should be part of the sustainability statement. Recommend referencing corporate water efficiency standards from larger organisations to inform policy, particularly for laboratory buildings.	204475 (Max Fordham), 204764 (Mothers CAN Cambridge)
Encouraged to see a high standard being promoted for non-household development. Regarding the phrasing “unless demonstrated not practicable”; we strongly encourage GCSP to define how “non-practicable” will be assessed. We would also encourage a minimum of 3 credits for Wat 01 where 5 credits cannot be achieved, as per the Shared Standard.	211136 (Environment Agency)
Clearly state whether point d applies in addition to point c for non-household developments which use as part of a commercial process(es).	211137 (Environment Agency)
Recommend the inclusion of a section dealing specifically with Data Centre’s water efficiency as these are an emerging sector with high water consumption.	211139 (Environment Agency)
The policy goes beyond national and industry guidance by effectively mandating rainwater or greywater harvesting on all major developments, which will not always be appropriate or deliverable. The policy requirement for commercial units to achieve all five BREEAM water credits is considered challenging and often unfeasible, with flexibility only applied to WAT 01. The draft Plan is largely silent on BREEAM, and the policy's requirements would necessitate all commercial developments to engage a qualified	203394 (Babraham Research Campus Ltd), 204249 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)

<p>BREEAM assessor, leading to additional costs and concerns about proportionality for smaller or less complex schemes. Suggest, remove requirement for rainwater or greywater harvesting being mandated in all major developments, this should only be delivered where viable or feasible. Remove requirement to comply with all 5 BREEAM water credits.</p>	
<p>Goes beyond minimum compliance and typically demands specialist design and technology. Wat 04 is difficult to control because it focuses on unregulated water uses, which rely heavily on end users, operational practices and decisions made after construction. As a result, even with strong design intentions, it can be challenging to guarantee performance outcomes, and the measures required may not always be feasible within the physical or operational limitations of the site. We therefore recommend that these requirements are supported by clear viability guidance or phased implementation and that flexibility is allowed where site specific constraints limit the ability to achieve the highest water efficiency standards.</p>	208269 (Martin Grant Land)
<p>Stringent BREEAM requirements are inflexible and one size fits all approach and there is no evidence that they can be achieved for water intensive uses such as research facilities, laboratories, food production, leisure or hospitality sectors. The policy fails to consider viability impacts, scale, use type and operational requirements.</p>	130695 (Redrow South Midlands)
<p>Assume that the target of 5 credits for category Wat01 of BREEAM will be relevant for student accommodation. To achieve these targets will require extensive water management and recycling facilities including potentially rainwater harvesting and greywater recycling, which will have considerable commercial and technical implications, particularly with respect to maintenance. The term 'unless</p>	208305 (Girton College), 210979 (Kings College) 208295 (Trinity College), 211760 (Urban & Civic)

demonstrated not practicable' should therefore be applied to decision making and all of the water efficiency targets presented.	
The practical and viability implications of the proposed standards should be carefully considered. In particular, the requirement for non-domestic building to obtain 5 credits for category Wat 01 (BREEAM) is a challenge given the consumption of water. Request the following is added to the policy: 'Buildings in the tourism or similar sectors may warrant flexibility with these water efficiency targets subject to the provision of commercial or viability evidence'.	210595 (Imperial War Museum)

Comments on Refurbishment of buildings

Summary of issues raised in comments	Comments highlighting this issue
Part 2e: The requirement for sustainability retrofitting of an existing building being developed is commendable, but may not be financially viable, so offsetting contribution instead should be allowed.	203152 (Cambridge Past, Present and Future)
Support part 2e but should be strengthened by giving a methodology or target efficiency. It is unlikely that in most cases water recycling could be easily retrofitted to achieve 5 BREEAM credits, however referencing the methodology and a minimum number of credits will strengthen this requirement. Water efficiency proposals should be set out in the Sustainability Statement.	204475 (Max Fordham), 204764 (Mothers CAN Cambridge), 205210 (Cam Valley Forum)
Part 2e: 'should' should be changed to 'must' to further the policy's application.	211138 (Environment Agency)
Clause 2e should apply water efficiency standards to refurbishment and change of use of existing buildings, rather than merely requiring retrofitting to "increase water efficiency".	210916 (Great Shelford PC)

Comments on Water reuse

Summary of issues raised in comments	Comments highlighting this issue
Support for water reuse and recycling rather than water credits. Eddington is currently not operating as planned because the Drinking Water Inspectorate requires non-potable supplies to be treated to potable standards due to concerns about cross-contamination.	205651 (A Sykes)
Part 3b (concerning how water efficiency is demonstrated) should be reworded to reflect the Shared Standards. Wording provided.	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)
All new builds should use grey water/ non potable water for washing machines and flushing toilets, as in Eddington but has not been turned on.	202846 (H Cook)
<p>The Topic Paper references the Shared Standards in Water Efficiency for Local Plans (June 2025) which has been prepared by several water companies and the Environment Agency. The specification proposed to achieve 85 l/p/d is only achieved if a bath is not supplied, which is a basic necessity for the majority of homeowners, particularly those with children or the elderly. Vistry and The Quay Estate consider the 85 l/p/d to be extremely challenging with the solutions presented in the topic paper (without greywater recycling) still not sufficient to meet the draft Policy requirement of 80 l/p/d.</p> <p>Greywater recycling is therefore necessary to meet the draft target and the Topic Paper estimates the</p>	210290 (Vistry Group)

<p>cost of such a unit to be £4,000 with the Viability assessment allocating a cost of c.£6,000 per unit for the purchase of water efficiency equipment only. The Viability study does not make allowance for on-going maintenance costs which are anticipated to be significant, especially for greywater recycling systems.</p>	
<p>In respect of criterion 5, which requires all new dwellings with private outdoor amenity space to provide a water butt and prioritises the use of rainwater for outdoor irrigation, Vistry and The Quay Estate support the principle of encouraging rainwater harvesting. However, consideration should be given to how this requirement would be secured and monitored in practice, particularly in relation to long-term management, maintenance and enforcement. Clarification on the intended implementation mechanisms, would assist in ensuring the policy is applied consistently and effectively.</p>	<p>210293 (Vistry Group)</p>

Comments on General water efficiency

<p>Summary of issues raised in comments</p>	<p>Comments highlighting this issue</p>
<p>A requirement of new development should be water retention and adequate purification infrastructure.</p>	<p>201038 (P Spowart)</p>
<p>The policy should reflect the 2025 Shared Standards, require Water Efficient Design Statements and completion certificates, and mandate smart meters and leak detection in all new buildings.</p>	<p>203667 (Cambridge Green Party), 205210 (Cam Valley Forum)</p>
<p>Whilst the sensitivity of water availability within the Greater Cambridge area is understood, the proposed water consumption targets in policy CC/WE are ambitious and should be tested further as</p>	<p>210060 (Endurance Estates)</p>

these may require rain/greywater harvesting. Revise Policy CC/WE to ensure that is based on evidence and does not make development unviable.	
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Other Comments

Summary of issues raised in comments	Comments highlighting this issue
Water meters should be compulsory.	201774 (H Jackson)
Water usage in construction should also be considered – encourage lean design in addition to efficient usage.	204069 (B Young)
Water company privatisation limits investment in repairing and improving facilities.	201038 (P Spowart)
Freshwater supply cannot sensibly be considered without simultaneously ensuring adequate balancing wastewater management.	202468 (J Neal)
Rural active travel routes should be bridleway to include equestrians	203945 (S Rogers)
Rainwater for outdoor irrigation - While we support the intent to reduce potable water consumption, the requirement as drafted is technically unclear, operationally problematic and introduces significant long-term management liabilities, particularly for multi-phase or multi-ownership residential developments.	208966 (Persimmon Homes East Midlands)
We would encourage wording in the policy’s justification (“Where Government policy or legislation relating to water efficiency is more stringent or at significant variance with this policy in the future, the more stringent standard will be adopted when determining planning applications.”) to be transferred as an additional point to the policy.	211140 (Environment Agency)

<p>Recommend the inclusion in relation to aquifers and source protection are added to the supporting text. These considerations can be useful to guide decisions regarding development and water availability:</p> <ul style="list-style-type: none"> - Bedrock geology from the northwest to southeast; - Principal Chalk aquifer and Source Protection Zones; Superficial deposits classified as Secondary aquifers; Aquifers that underly the area that are of high value; <p>We also recommend referencing Groundwater Protection, and other guidance and any superseded versions.</p>	<p>211142 (Environment Agency)</p>
<p>Water Supply Evidence</p> <p>Detailed comments provided on the evidence, including on 'water available for use', and approaches to non domestic use.</p> <p>Recommend that the GCSP consider what further measures it can put in place to ensure that the most ambitious water supply and efficiency targets are met.</p>	<p>211205, 211206, 211207 (Environment Agency)</p>

Policy CC/IW Integrated water management, sustainable drainage and water quality

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy from a range of stakeholders including statutory bodies, environmental groups and individuals.

There was some concern about the deliverability of the policy given issues with infrastructure at both Cambridge and Uttons Drove Water Recycling Centres and concern about overall levels of growth damaging rivers and chalk aquifers. There were representations from Cambridge Water and Anglian Water setting out their processes and plans and acknowledging that joint working has been carried out with the Councils.

There was considerable support for SuDS, but with comments that they are not suitable everywhere, such as where there is contaminated land, and that their adoption must be secured particularly as in the past unclear ownership has put maintenance at risk. There was support for the water quality part of the policy which sets out the requirements to ensure adequate wastewater treatment. A number of comments highlighted the importance of robust investigation and water quality control measures.

There was also some objection from developers that this part of the policy places responsibility on developers to demonstrate wastewater treatment capacity and that this responsibility lies with water and sewage companies.

The Environment Agency provided detailed feedback on the Water cycle Strategy with regard to waste water provision.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

The policy seeks to ensure that development proposals would not cause detriment to water quality by ensuring that there is adequate wastewater treatment and conveyancing infrastructure to serve the development prior to occupation which would relate to each phase and as explained in the supporting text would be conditioned. Anglian Water's next Drainage and Wastewater Management Plan (DWMP28) will look at the growth proposed in the Local Plan and what infrastructure will be needed to protect water quality. The Councils will continue to work collaboratively with Anglian Water during the development of this plan which will look at requirements at Cambridge Water Recycling Centre (WRC), Uttons Drove WRC and the other WRCs in Greater Cambridge. The strategic sites are planned for later in the plan period which will give a longer lead in time for investment in wastewater treatment infrastructure.

The concerns about SuDS in areas of contaminated land and the adoption of SuDS has been considered in changes to the wording of the policy.

Water Supply issues have been carefully considered during the preparation of the Local Plan. Working with the Cambridge Water Scarcity Group which was established by the government, the Local Plan is supported by a Water Supply evidence base exploring the availability of sustainable water supply alongside the anticipated development trajectory. Infrastructure is planned which will

bring new supplies to Greater Cambridge in order to reduce the reliance on water from the chalk aquifer. However, it also remains vital that water is used efficiently in this area therefore water efficiency policies are proposed which set more stringent levels than are applied nationally.

Environment Agency comments on the Water Cycle Strategy have been reviewed by the consultants who produced the study. An Addendum Report has been published, responding to the comments. A Statement of Common Ground has also been agreed with the Environment Agency and Anglian Water on the approach to wastewater infrastructure.

Table of representations:

General comments

Summary of issues raised in comments	Comments highlighting this issue
Support policy	202706 (C Todd), 201928 (R Pargeter), 202848 (H Cook), 202911 (Cambridge City Council Liberal Democrat Group), 203668 (Cambridge Green Party), 203021 (M Cleminson), 202191 (R Lambert)

Fully support bullet points 1 and 2 of the policy	202958 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
Support the requirement to make use of nature-based solutions wherever practicable (Point 1d).	205261 (Cam Valley Forum), 203668 (Cambridge Green Party), 207618 (Natural England)
These issues must be explored during the preparation of the Plan and not left until the submission of applications. If such exploration is not evidenced, it could render allocations undeliverable.	203178 (ESCO Prospect)
Highlights major concerns about water abstraction impacting chalk streams; notes Cambridge Water already extracts above sustainable limits and warns that development should not proceed without water infrastructure. Importance of protecting chalk streams emphasised. Development should not proceed until adequate water supply and wastewater infrastructure is provided, to avoid further damage to rivers and chalk streams. New homes will increase water use and place further pressure on chalk streams which are already ecologically vulnerable.	203288 (J Palmer)
Regarding the wider groundwater crisis, and the impact of that on our chalk streams. The need to find effective ways to mitigate and reduce the additional burdens created by any new development is a matter that concerns the Trustees directly. There is NO MARGIN for further growth to allow for chalk stream and rivers to be restored to normal from around 2036. The Trustees therefore warmly welcome	209016 (Hobsons Conduit Trust)

<p>the way Policy CC/IW focuses on these issues. However, a number of the measures require progress including legislation and regulation to make targets achievable.</p>	
<p>Concerns about the deliverability of the policy which threatens the deliverability of the Local Plan. This is due to the lack of funding for the relocation of the Cambridge Waste Water Treatment Plant and a delay in the Fens Reservoir which could impact water supply.</p> <p>If Policy CC/IW and the wider strategic issues relating to water scarcity and management cannot be delivered in a timely manner, the Plan will not be able to supply even a fraction of the new jobs and new homes demanded of our region, and certainly not in the desired strategic locations. Instead, growth will occur piecemeal across the region – negatively impacting our existing communities,</p>	<p>201565 (Stapleford PC) 210917, 210918 (Great Shelford PC)</p>
<p>There are serious concerns regarding increased flood risk from developments within the Swavesey surface water catchment area, as the existing drainage system is already at capacity. Detail is provided about specific issues relating to Webb’s Hole Sluice and Uttons Drove Treatment Works. Major developments should negotiate S106 contributions for onsite and offsite mitigation to address local flood risk concerns and improve existing infrastructure.</p>	<p>201989 (Swavesey PC)</p>
<p>A policy should be added to stipulate that any new development must not result in any increase in flood risk (fluvial or surface water) to any properties, buildings or infrastructure.</p>	<p>202439 (R MacDonald)</p>
<p>Support sections 1.a and 1.b. and 4.d for a whole development scale strategy for integrated water management from the earliest opportunity. This will help ensure the most efficient use of land and resources in a way that co-benefits biodiversity and amenity. Water re-use and infiltration aspects of the policy are crucial to protecting groundwater resources and taking pressure off the Fens where fluvial</p>	<p>211148 (Environment Agency)</p>

waters will, over the coming decades, be decreasingly able to discharge by gravity discharge into a rising sea level. We welcome the recognition of this challenge in the supporting information.	
New developments should not be considered unless there is sufficient water infrastructure in order to protect chalk streams and they are self-sufficient in processing their own sewage without damaging the rivers.	201295 (R King), 209676 (H Hale)
Water stress, flooding, sea level rise, over-abstraction of chalk aquifers precludes further growth in this ultra-fragile landscape.	202146 (R Lambert)
Concern about the level of growth in the Local Plan and the impact further water abstraction poses to chalk streams, which are rare and valuable wildlife habitats. The push for growth should be halted until this fundamental issue has been resolved.	203252 (Cambridge Friends of the Earth), 203288 (J Palmer), 203253 (Cambridge Friends of the Earth)
The policy places unduly prescriptive requirements on strategic employment sites, including expectations for rainwater and greywater harvesting that may not be appropriate or deliverable in all circumstances. For large-scale logistics and industrial developments, the feasibility of integrated water reuse technologies should be assessed on a site-specific basis, having regard to operational requirements, building use, viability, and infrastructure constraints.	204333 (Tritax Big Box Developments)

Comments on Sustainable Drainage Systems

Summary of issues raised in comments	Comments highlighting this issue

Support infiltration drainage as a way to promote aquifer recharge and reduce flooding, but there are risks associated with installing infiltration SuDS in areas of contaminated land. Recommend this is referred to in part 4 or 5 of the policy and in the supporting text to the policy.	211147 (Environment Agency)
The LLFA support that the policy requires SuDS to be incorporated as part of new developments. There should be reference made to the SuDS Management train. The management train is a sequence of drainage features that collect, convey, store and manage quality of surface water runoff as it drains through the development. Source control, in the management train, should be prioritised.	210507 (Cambridgeshire County Council)
Support the integration of Sustainable Drainage Systems (SuDS) into developments as a way of managing surface water runoff.	211235 (Living Space housing Ltd) 211460 (Hayfield Homes construction Ltd)
New housing should minimise impermeable hard surfaces to avoid run off.	202848 (H Cook), 202621 (C Pointon), 203559 (P Tribble), 203021 (M Cleminson)
There should also be requirements that prevent residents turning soft surfaces areas into hardstanding, an action which reduces natural drainage.	203559 (P Tribble)
Concerns about clause 4, which assumes SuDS are suitable for all locations. The Stapleford & Great Shelford Neighbourhood Plan had to be amended to require their use 'wherever practicable and subject to being suitable to the location'.	201565 (Stapleford PC) 210919 (Great Shelford PC)

<p>Part 4 should be amended to read 'New development must FULLY incorporate Sustainable Drainage Systems (SuDS) as part of an Integrated Water Management approach to the design of the whole site' to ensure SuDS requirements are met in full.</p>	<p>203161 (Cambridge Past, Present and Future)</p>
<p>Section 4e, recommend changing "where reasonably practicable" to "wherever practicable" as permeable surfaces are essential for drainage.</p>	<p>203668 (Cambridge Green Party), 205261 (Cam Valley Forum)</p>
<p>Pavement verges can operate as rain gardens and help to alleviate flooding. Verges can be more than grass, add aesthetic beauty and relief, can attract pollinators and can be used strategically. Can we have greener water managing streetscapes.</p>	<p>203978 (Histon and Impington PC) 211008 (Cambridgeshire County Council)</p>
<p>Object to criterion 4(f) requesting its deletion due to a lack of evidence and viability testing regarding the requirement for green and brown roofs.</p>	<p>204558 (Redrow South Midlands)</p>
<p>Clause 4h regarding the adoption of SuDS must include specific wording to require responsibility for management and maintenance to be clearly assigned, given local experience where unclear ownership has put maintenance at risk e.g. Trinity Gate development. The word 'details' is not sufficiently specific.</p>	<p>201928 (R Pargeter), 203101 (K Wiemer), 203668 (Cambridge Green Party), 205261 (Cam Valley Forum), 208623 (Madingley Road Area Residents Association (MRARA)),</p>

<p>The policy is generally supported but there is concern that the interpretation of attenuation may obstruct innovative solutions for water harvesting.</p>	<p>202465 (University of Cambridge)</p>
<p>We would welcome reference to our Surface Water Risk Management Guidance in the supporting text.</p> <p>The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be conducted by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected to our surface water network until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated.</p>	<p>210200 (Anglian Water Services)</p>
<p>fully supports the principles of integrated water management and sustainable drainage.</p> <p>However, we would like to raise the following points for consideration to ensure the policy is deliverable and proportionate:</p> <p>Mandating green or brown roofs on all flat roofs can present significant challenges, particularly for refurbishments. Structural capacity, cost implications, and heritage constraints may make this impractical in some cases. We suggest allowing flexibility where technical or viability issues arise, supported by alternative biodiversity measures.</p> <p>Designing for no runoff during small rainfall events is ambitious and may be difficult to achieve on constrained or high-density sites. We recommend considering a performance-based approach that allows equivalent mitigation measures where strict compliance is not feasible.</p>	<p>208261 (Martin Grant Land)</p>
<p>Object to policy as it introduces a number of requirements that are not sufficiently justified, lack flexibility for site-specific delivery, and risk compromising the viability and timely implementation of strategic</p>	<p>210504 (Barratt Homes Northampton)</p>

<p>developments. The policy appears to assume that infiltration SuDS will be feasible across most development sites, yet this has not been robustly evidenced. Policy CC/IW should be revised to provide greater flexibility, clarity and proportionality. The policy should recognise that not all SuDS types are feasible on all sites and should allow developers to select the most appropriate drainage strategy based on site-specific assessments.</p>	
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Comments on Water Quality

Summary of issues raised in comments	Comments highlighting this issue
<p>Generally support wording of wastewater part of policy. 6a should be tightened from 'adequate' to ensuring that there is sufficient capacity in any conveyancing infrastructure that the new network might connect to. Suggestions for the supporting text on different wastewater 'capacity' considerations for development proposals, and if wastewater infrastructure capacity is unavailable mitigation could be delaying occupation of the development to protect water quality.</p> <p>If sufficient waste water infrastructure capacity is unavailable at the time of planning application submissions, risk to the environment from the development combined with wider planned growth could be mitigated by using a condition to delay occupation.</p>	<p>211143, 211144, 211145, (Environment Agency)</p>
<p>This policy is welcomed, particularly the requirements around water quality, which will be necessary to avoid impacts to various protected sites including the Ouse Washes.</p>	<p>207618 (Natural England)</p>

<p>Object to criterion 6(a), which places the responsibility on developers to demonstrate wastewater treatment capacity. This responsibility lies with water and sewerage companies, as per the Water Industry Act 1991. Request to delete or revise the criterion.</p> <p>Alternative wording provided by CIP:</p> <p>6. To protect and enhance water quality, all development proposals must demonstrate that:</p> <p>a..there is adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place with the relevant service provider to ensure the provision of the necessary infrastructure to support the capacity for wastewater treatment prior to the occupation of the development (where development is being phased, this must be demonstrated for each phase before first occupation).</p>	<p>204558 (Redrow South Midlands), 201285 and 204285 (Cambridge Investment Partnership), 204780 (Hill), 203054 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 205236 (Home Builders Federation), 210294, 210295 (Vistry Group) 210600 (Imperial War Museum)</p>
<p>Supports the need for integrated water management and strategic thinking and this has been considered within our site and new development activities. The College does have concerns respect to the application of paragraph 6 of the policy which risks placing an unreasonable and disproportionate evidential burden on applicants at the planning application stage. Policy CC/IW should be implemented flexibly, with appropriate reliance placed on the statutory duties of water companies and ongoing engagement through established mechanisms such as Water Resource Management Plans and Drainage and Wastewater Management Plans.</p>	<p>210980 (Kings College) 208306 (Girton College)</p>

<p>Support part 7 of the policy which outlines that foul drainage should connect to public sewers (Mains) wherever possible. It would helpful be to expand on this further within the supporting text section to clarify guidance on non-mains drainage.</p>	<p>211146 (Environment Agency)</p>
<p>Would like to see 'water quality' as a separate full policy which would need to address the many aspects of a development that contribute to poor water quality in the natural environment, with developers being required to demonstrate that any wastewater generated during construction and use of the development will not have a negative impact.</p>	<p>205261 (Cam Valley Forum)</p>
<p>As indicated in our response, Anglian Water is working proactively with stakeholders, to address current capacity constraints at some of our water recycling centres (WRC). This has been further exacerbated by the withdrawal for funding for CWWTPR, meaning that further investment will need to be brought forward to deliver enhancements at the existing Cambridge WRC in the short term, and in the long term if alternative funding cannot be secured for delivery of CWWTPR. Until such time as the opportunity to deliver CWWTPR expires, the Local Plan should recognise the CWWTPR project and ensure appropriate safeguarding of the consented relocation site (as requested under Policy I/SI).</p> <p>Anglian Water is currently preparing the DWMP28 and we will continue to engage with the Councils at various stages of the DWMP's development to ensure that this takes account of the quantum of growth proposed for Greater Cambridge.</p>	<p>209161 (Anglian Water Services)</p>
<p>Chalk streams are internationally rare and highly sensitive ecosystems. Policies must provide explicit and robust protection for chalk streams.</p>	<p>211722 (CPRE Cambridgeshire and Peterborough)</p>

Other Comments

Summary of issues raised in comments	Comments highlighting this issue
<p>We are pleased to see that the detailed WCS scope covers a number of positive areas, including but not limited to summarising growth projections in relation to DWF uplift, and we welcome consideration of climate change impacts on waste water treatment. It is really important that evidence within the WCS is capable of informing growth allocations and the Plan can be positively prepared through robust scrutiny of any environmental risks resulting from growth. The WCS needs to be updated accordingly, and we recommend maintaining it as a living document. Detailed comments on the WCS have been provided,</p>	<p>211188, 211189, 211190, 211191, 211192, 211193, 211194, 211195, 211196, 211197, 211199, 211202, 211203, 211204 (Environment Agency)</p>
<p>It has been confirmed by SCDC that there has been irreparable damage to the hydraulic ecosystem underneath our village, we must insist that no further development of any sort should be permitted within the Parish of Longstanton or the surrounding parishes without full and transparent public consultation to get ahead of any potential issues.</p>	<p>208467 (Longstanton Parish Council)</p>
<p>Rural active travel routes should be bridleway to include equestrians</p>	<p>203949 (S Rogers)</p>
<p>Water Quality must require rigorous site investigation and remediation of contaminated land, particularly where development could affect groundwater or surface water bodies.</p> <p>The Plan should explicitly recognise and protect private water supplies, including boreholes used by rural homes, farms, and businesses. Development proposals should be required to demonstrate that water quality and abstraction will not be compromised.</p>	<p>208952, 208953 (CPRE Cambridgeshire & Peterborough)</p>

<p>The dewatering at Northstowe demonstrates that buried rivers are capable of transporting large quantities of water away from a site but brings into question the usefulness of the BRE365 infiltration tests. Such deposits can also transport large quantities of water onto a site. To demonstrate the potential flow rates, please take a look at the size of the culverts on the Newmarket Watercourse and Saffron Walden Slades. In 2021, SCDC commissioned a Hydrogeological Assessment so I find it strange that there was no reference to the river terrace being a buried valley. It is an issue affecting the whole Anglian region and it is not being addressed.</p> <p>Part of the problem is that the watercourses map, an LLFA responsibility, has not been maintained.</p>	<p>208401. 208402 (R Mason)</p>
<p>Conduit faces increasing pressure from the growing working and residential population around the Biomedical Campus, Clay Farm and the south-eastern axis. We therefore believe that the ambitions set out for the area on the northern slopes of White Hill need far greater definition and greater ambition. This would also be entirely consistent with the Trust's Vision for Nine Wells.</p>	<p>209015 Hobsons Conduit Trust)</p>

Policy CC/FM: Managing flood risk

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Some comments gave general support for the policy approach, and to some specific elements of the proposed policy.

Anglian Water supported reference to the potential for sites to deliver betterment. East England Ambulance Service NHS Trust highlighted the negative impacts of flooding and emphasised the importance of measures to address it.

The Environment Agency made detailed comments. These included being clearer about the need to consider the impacts of climate change, the need to reapply tests if flood risk evidence had changed, that modelling may be required as part of site-specific flood risk assessments, considering off site impacts, residual risks, and when emergency plans need to be provided.

Cambridge Past, Present and Future sought clarity about what information should accompany planning applications, and that management arrangements for mitigation should also be identified up front. Cambridge Green Party considered the exception for allocated sites should be removed.

Some comments suggested the policy was not consistent with national policy, and that it set disproportionate requirements. Updates to the National Planning Practice were also cited which needed to be considered.

Others considered the policy was not strong enough in light of the challenges of climate change. Requirements should be widened to require flood risk assessments in allocations. Future monitoring was also needed. The cumulative impacts of development in catchments needed to be considered. Others sited that restored water courses could end up having more water in them, increasing flood risk.

There were some general concerns about the impacts of flooding and the risk from climate change. There was concern about new developments being built on flood plains. Some people also gave examples of local drainage problems

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Flood risk has been carefully assessed when preparing the Local Plan. The Local Plan has been informed by a Strategic Flood Risk Assessment (SFRA), and the application of the sequential test to the site selection process. The SFRA (including a Level 1 and a Level 2 for some sites) was prepared in consultation with the Environment Agency and provides a robust basis for plan making. This includes consideration of the impacts of climate change.

The policy appropriately reflects national planning policy regarding the sequential and exception tests but does not seek to repeat it. Some comments from developers questioned whether the policy reflected government planning practice guidance, particularly the approach to surface water in sequential testing. The Local Plan does not need to repeat that advice, and the draft policy remains sound.

A number of detailed policy amendments have been made in response to comments, including to more clearly reference the need to consider climate change, and the need for information regarding future management of mitigation measures. It also identifies requirements in relation to change of use.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy.	201349 (RSPB), 201994 (Swavesey Parish Council), 204040 (Hertfordshire County Council), 204335 (Tritax Big Box Developments)
Welcome the policy's emphasis on demonstrating that flood risk can be safely managed throughout the lifetime of development.	204335 (Tritax Big Box Developments)
This policy must ensure that the cumulative collection of data is assessed. Where there are large scale developments in the same area, the Local Plan needs to ensure the impact of all sites is assessed as a whole, rather than just looking at individual ones. For example, with surface water and treated foul water flowing out to the River Gt Ouse through the Swavesey drainage system. Many large sites will outflow through this (Northstowe, Cambourne, Bourn, proposed new logistics sites), these need to be considered on a cumulative basis as well as individual.	202552 (L Miller)

<p>Also need a policy for adaption to climate change, and making sure drains are maintained. Many areas have standing water on the road as drains are not maintained.</p>	<p>202707 (C Todd), 202479 (J Neal)</p>
<p>We also support policy CC/FM but would note that there is potential for increased flows in our chalk streams and higher ground water tables from a restored aquifer towards the end of this Local Plan period. How do the policies and calculations of flood risk align with healthier river systems with more natural rather than low flows? Should the starting point for assessing flood risk be to use the future restored river system with more natural flows as the starting point for analysing flood risk management?</p>	<p>202960 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust (M Baker, Conservation Manager)</p>
<p>Supports Policy CC/FM and the approach for site-specific Flood Risk Assessments (FRAs) that are appropriate to the scale and nature of the development.</p> <p>The respondent endorses limb 1 (a) of the Policy, which states that a sequential test is not necessary for proposals on allocated sites consistent with the allocated use, suggesting this should be assessed during the Plan Making stage. The respondent references a High Court ruling confirming that failure to undertake a sequential test does not automatically constitute a strong reason for refusal ([2026] EWHC 51 (Admin)).</p>	<p>203058 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)</p>
<p>Support the policy but propose amendment to ensure full information is provided in planning applications as to what has been agreed with which relevant bodies. Amend part f by adding 'and are included as part of the planning application' at the end</p> <p>f. The ongoing maintenance and management of any necessary flood defences or flood mitigation measures have been agreed with the relevant bodies and the necessary agreements are in place and are included as part of the planning application.</p>	<p>203167 (Cambridge Past, Present and Future (S Nicholas)</p>

<p>We welcome the strong precautionary approach of this policy and fully support making flooding a separate policy issue, rather than including it with the previous policy as was the case in the first draft of the Local Plan. In point 1.a, we recommend deleting the exception stating “(this is not necessary if the proposal is on an allocated site and consistent with the allocated use).” Removing this exception would ensure that flood risk is assessed consistently for all developments, recognising that allocation does not remove or reduce real and increasing flood risks under climate change.</p>	<p>203670 (Cambridge Green Party)</p>
<p>I am writing as a resident of Oakington and Westwick and Lead of the Flood Mitigation Group in the village. I am increasingly concerned about the cumulative impact that current and emerging proposals within South Cambridgeshire Local Plan will have on flood resilience in the area, particularly in our village that has, to date, received no investment for attenuation ponds, surface water storage, or related mitigation infrastructure despite repeated and significant surface water flooding events. I would welcome the opportunity to discuss this matter further or provide more input if helpful.</p>	<p>204991 (A Dennis)</p>
<p>We do not think this policy is sufficiently strong to provide adequate management of flood risk. We have provided some suggestions for improvement but would like this policy to be rethought more carefully, given the scale of development that is anticipated within the life of this plan.</p> <p>This policy needs to make it very, very clear that the risk of flooding has greatly increased with the rapid acceleration of climate change and the unpredictable nature of rainfall as evidenced by recent events. Development must be shown to conserve Cambridge's distinctive "Rus in Urbe" character. Point 1a: we recommend deleting the exception to ensure that flood risk is assessed consistently for all developments. Points 1g. and 1h. the policy needs to require future monitoring by responsible</p>	<p>205357 (Cam Valley Forum)</p>

<p>authorities. Point 2. a site-specific Flood Risk Assessment should be a requirement for all developments in Flood Zone 1.</p>	
<p>Should be expanded to include reference to the need to consider the impacts of climate change and all sources of flood risk when applying the sequential and exception tests. We recommend rewording this to: ‘...having regard to actual and residual flood risks from all sources and taking into account the impacts of climate change’. This would be in line with the recommendations of the Level 1 SFRA. Paragraph 174 of the NPPF states that the sequential test should be used in areas known to be at risk of flooding now or in the future from any form of flooding</p>	<p>211149 (Environment Agency)</p>
<p>The wording in brackets should be caveated as the exception test may need to be reapplied at the planning application stage – e.g. if evidence on flood risk has changed significantly or the nature of the development differs significantly from the nature of the allocation (see paragraph 180 of the NPPF)</p>	<p>211150 (Environment Agency)</p>
<p>We recommend that reference is made to the need for development proposals in flood risk areas to demonstrate that all reasonable opportunities to use natural flood management techniques or nature-based solutions to reduce flood risk overall have been considered and taken, in line with paragraph 172 of the NPPF</p>	<p>211154 (Environment Agency)</p>
<p>Recommend that the policy makes it clear that where hydraulic modelling of a watercourse within or adjacent to a site is not available or is out-of-date, modelling may be required as part of a site-specific FRA to define the extents and depths of fluvial flood risk at the site. This will help ensure FRAs include</p>	<p>211155 (Environment Agency)</p>

<p>sufficient evidence to ensure a sequential approach is taken and to inform any proposed mitigation measures to ensure the development will be safe for its lifetime.</p>	
<p>Recommend the policy clarifies that any development in the floodplain (i.e. within the 1% annual probability flood extent, including an allowance for climate change) that is considered acceptable must not decrease flood storage capacity or impede flood water flows. See draft policy LP13 of the draft Hunts Local Plan for suggested wording.</p>	<p>211156 (Environment Agency)</p>
<p>Recommend clarifying that if development is proposed within areas benefitting from flood defences, the FRA should assess the residual risk of a flood defence breach or overtopping and breach analysis or modelling may be required where 'more vulnerable' development is proposed</p>	<p>211157 (Environment Agency)</p>
<p>Recommend that the policy clarifies the Council's position on change of use applications in flood risk areas. The PPG recommends that Local Plans outline where change of use applications will be acceptable. These applications are excluded from the sequential and exception test but may still involve an increase in flood risk, either due to an increase in the number of properties in flood risk areas or an increase in the flood risk vulnerability classification. We recommend that appropriate restrictions are placed on change of use applications for sites within Flood Zones 3b and 3a, and within areas of high surface water flood risk, where 'more vulnerable' basement or ground floor uses may not be appropriate.</p>	<p>211158 (Environment Agency)</p>
<p>In respect of 1d, the safety of access / egress routes should be defined – i.e. Is a dry route of escape required or is some depth of flood water along the route acceptable? This point should also clarify when emergency plans need to be provided.</p>	<p>211153 (Environment Agency)</p>

<p>Support the inclusion of the policy as it covers the importance of managing flood risk in new developments. Please note we would encourage reference to the NPPF and PPG in this policy. It is appreciated the policy has a proactive approach to mitigating and adapting to climate change, with reference to surface water flooding within the local plan. Please note, in section 4.44, there is a reference to 'safe access and egress route'; however, this should be revised to read as 'safe access and escape route' in line with PPG.</p> <p>Level 2 Strategic Flood Risk Assessment: The term 'safe access and egress' should not be used. It should read 'safe access and escape'. This is in line with PPG updates. We appreciate the level detail presented with reference to surface water flood risk in the report. In particular, the suite of maps provided for allocated plots. However, it is unclear whether the most up to date data is used for surface water flood risk mapping.</p>	<p>210574, 210508 (Cambridgeshire County Council)</p>
<p>We particularly welcome clauses 1.c and 1.e that positively influence the potential for betterment and ensuring existing assets are not adversely impacted by proposals. As indicated in our response to Policy CC/W, our Flooding Incident Reduction Plan is available on our website and sets out how we aim to mitigation flooding risks across our region. It is essential for the effective management of our operational risk that we ensure the risk posed from surface water drainage</p>	<p>210201 (Anglian Water Services)</p>
<p>Policy does not reflect the updated Planning Practice Guidance (“PPG”) (updated 17 09 2025) relating to sequential testing. Policy CC/FM states that development proposals will be supported where the sequential test has been passed. However, this is not in line with the updated PPG, which states that a proportionate approach should be taken, applying NPPF Paragraph 175. The PPG makes clear that where a site-specific flood risk assessment demonstrates clearly that the proposal would ensure that</p>	<p>211221, 211265 (Terra Strategic) 211236 (Living Space Housing) 208908 (Nightingale Land and Hill Residential Ltd) 204524 (NP</p>

<p>occupiers and users would remain safe from surface water flood risk for the lifetime of the development (without increasing flood risk elsewhere) a sequential test is not required. Terra therefore request that this Policy be amended to reflect the updated PPG.</p>	<p>Architects) 211461 (Hayfield Homes Construction Ltd)</p>
<p>Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.</p>	<p>210352 (Community Campaigner D Barton)</p>
<p>Flooding significantly affects residents physical and mental health in both the short and long term. Systematic reviews show consistent increases in PTSD, depression and anxiety after flooding events. Evidence that flooding disrupts healthcare systems and emergency access, damaging infrastructure and increasing demand. EEAST therefore requests:</p> <ul style="list-style-type: none"> • Sustainable Urban Drainage Systems (SUDS) • Permeable paving accessible to mobility aids • Greywater harvesting via water butts or underground attenuation • Swales and flood-protection features in Zones 2 and 3 • Care homes should NOT be located in Flood Zones 2 or 3 unless they include a fully independent evacuation plan that does not require emergency service intervention • Community centres should not be built in Flood Zones 2 or 3 as they are often used as places of refuge • Health and emergency services buildings should not be built in Flood Zone areas 2 and 3. <p>Emergency ambulance services have to use specialised vehicles (including onboard equipment such as life jackets) and trained staff to support flood/water related incidents and these sites are strategically located around the region and my not be local to Greater Cambridge area.</p>	<p>210321, 210322 (East England Ambulance Service NHS Trust)</p>

<p>Concerns about building in the flood plain, and the impacts of climate change. Also concern about whether insurance will be available of properties within flood areas.</p>	<p>208760 (E. Diaz) 202201 (R. Lambert) 205235 (Federation of Cambridge Residents' Associations)</p>
<p>For the Swavesey catchment area, onsite attenuation for new development should be capable of holding water for up to 4 weeks when the Webb's Hole sluice closes to prevent inundation of the drainage system and flood fens. Site attenuation basins must reopen in a managed manner when the water level in the River Gt Ouse drops and the Webb's Hole sluice opens to avoid overwhelming the drainage system. The unique drainage system of Swavesey requires careful management. SCDC Awarded Watercourses should be considered in the overall drainage strategy for Swavesey.</p>	<p>201994 (Swavesey PC)</p>
<p>Swavesey's drainage system is already at capacity; the plan lacks cumulative attenuation data and basins capable of holding water for up to four weeks, and does not assure that Uttons Drove Treatment Works can handle the additional demands and that the drainage system will cope.</p>	<p>206381 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211434 (Boxworth Parish Meeting)</p>
<p>The plan fails to present a cumulative flood-risk assessment for the four logistics sites, despite the clear need for such analysis.</p>	<p>206371 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 207713 (Boxworth Parish Meeting)</p>
<p>Support, the policy reiterates the approach set out in the National Planning Policy Framework, taking into account the impacts of climate change.</p>	<p>208262 (Savills on behalf of Martin Grant Land Limited)</p>

<p>The Strategic Flood Risk Assessment omits buried valleys, failing to meet NPPF sequential-test requirements set out in paragraphs 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182. The concealed occurrence of buried valleys can have significant and often unexpected implications for groundwater and hydrocarbon or geothermal resources.</p>	208400 (R Mason)
<p>What concerns me is that in August 2014 ex Hurricane Bertha resulted in flooding to the west and north of Cambridge. The villages of Caldecote, Bar Hill, Longstanton and Oakington and the local A428 all experienced flooding. Cambridgeshire LLFA's flood reports on this event went no farther than excessive surface flooding and poorly maintained drains.</p>	208403 (R Mason)
<p>I hope and expect that in future, any LLFA flooding reports will be both timely and meet the standards given in this document. However, the EA have completely failed to engage with these investigations or with the LLFA on these matters</p>	208404 (R Mason)
<p>While we support the principle of minimising flood risk and ensuring robust SuDS design, this requirement is overly prescriptive, technically unjustified, and undeliverable in many site contexts.</p>	208967 (Persimmon Homes East Midlands)
<p>Missing borehole data – including Busway, Northstowe, Cambourne or Bourn Airfield.</p>	211111 (R Mason)
<p>We support part 1b as it requires a sequential approach to be taken to the site layout, avoiding any areas of flood risk.</p>	211151 (Environment Agency)
<p>We support the reference to reducing flood risk overall where possible in 1c. However, we would like this to be expanded to include reference to the use of natural flood management techniques.</p>	211152 (Environment Agency)
<p>Explicit guidance is needed on the flood-alleviation role of micro rain-gardens and on how funding for them will be allocated.</p>	208008 (Cambridgeshire County Council)
<p>Rural active travel routes should be bridleway to include equestrians</p>	203951 (S Rogers)

<p>The supporting information mentions a Strategic Flood Risk Assessment (SFRA). The 2021 modelling used to map the River Granta is not based on the River Granta, nor on its porosity and ground conditions. As a result, there are notable discrepancies with actual flood events and historic flood events. The evidence should be reviewed and properly assessed so the Plan for this and any other similar areas are based on robust evidence.</p>	<p>211928 (C. Newell)</p>
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Policy CC/RE: Renewable energy projects and infrastructure

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy and the specific references to biodiversity and the retention of biodiversity net gain at the end of a projects life.

Historic England broadly welcomed the policy but made some suggestions to strengthen the policy in relation to heritage assets. They also queried the approach taken to the Landscape Sensitivity Assessment and consideration given within this to heritage assets.

The Wildlife Trust welcomed the text on the loss of agricultural land and balances that must be struck between different competing land uses noting that too many solar farms could compromise nature recovery to address the biodiversity crisis by reducing land available for nature restoration and pitting nature restoration and food production against one another.

Stapleford Parish Council requested that reference to their neighbourhood plan be included in the criteria related to community energy proposals to ensure that such schemes protect or enhance landscape character.

Proposals for heat network zoning were welcomed although some raised concerns about the lack of case studies on successful projects. Max Fordhams called for a requirement for all heat networks to be low or zero carbon and have a decarbonisation strategy. Carbon intensity and efficiency of the heat network should be part of the feasibility study.

Some residents suggested that more enforcement of renewable energy projects was needed, especially in riverlands basins. There also needed to be ongoing monitoring of schemes as well as wider mitigation measures such as ecological enhancements.

The University of Cambridge requested clarification be added to the section on connection to district heating to make clear that this also applied to major refurbishment as well as new build. They also requested clarification as to what was meant by “unacceptable impacts” to avoid delays in determining applications. Of particular significance is the assessment of the impact of renewables on heritage buildings where there is significant opposition to rooftop solar on older buildings. They also called for better connection to the infrastructure chapter which referenced connections to the gas network but not district heating connections.

There was strong support for provision of photovoltaic panels to existing buildings and car parks.

Addition of a reference to energy storage was requested to enable developments to make best use of the energy generated.

CPPF suggested an amendment to the wording around the continuation of agricultural uses so that takes place both within and adjacent to projects.

Abbey Properties considered that the policy should be amended to mandate that unacceptable impacts are appropriately addressed rather than suggesting automatic refusal of planning permission. They also considered that if applied literally, part 1 of the policy if applied literally could prevent any development on agricultural land and considered part 5 of the policy unenforceable. They also suggested additional wording be added to part 7 of the policy in relation to community support for community led proposals.

Some residents raised concerns about the loss of agricultural land and Natural England raised concerns about renewable

energy projects on peat soils.

The East of England Ambulance service requested that should any data centres be built in or adjacent to the Greater Cambridge to utilise capture of heat generated to support industry or domestic heating.

While supportive of the general principle of the policy, Kingsway Solar considered that the policy was lacking in detail to enable the safeguarding of landscapes, biodiversity and community wellbeing from large-scale developments.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Changes to the supporting text have been made in response to the representations received from Historic England, to help clarify the approach that should be taken to consider the impacts of projects on heritage assets. Notably, this includes detail on the submission of detailed Heritage Impact Assessments to consider all designated and non-designated heritage assets and their settings added to paragraph 4.49 of the supporting text. Regarding the Landscape Sensitivity Assessment, this was prepared following the guidance prepared by Natural England. It is not intended to be interpreted as defining the suitability of individual sites for development and does not replace the requirement for more detailed studies, including Heritage Impact Assessment. An additional reference to Heritage Impact Assessment has been added to paragraph 4.44 of the supporting text.

Concerns about ongoing monitoring and enforcement of projects are noted, but enforcement sits outside the remit of the local plan. Where there are concerns about existing schemes not complying with their planning permissions, this should be reported to the Shared Planning Services enforcement team. Regarding the ongoing monitoring of elements such as

proposals for Biodiversity Net Gain (BNG), this forms a key part of our BNG policy and will be prescribed and secured through conservation covenants, planning conditions and / or obligations.

Regarding requests to add specific reference to Neighbourhood Plans to the policy in relation to community energy schemes, the inclusion of such a reference is not considered necessary. On adoption, Neighbourhood Plans form part of the statutory development plan for the area and as such any developments falling within the area covered by the Neighbourhood Plan would have to have consideration to both the Local Plan and the Neighbourhood Plan. As such it is not considered necessary to make specific reference to individual Neighbourhood Plans within this policy. Community led renewable energy projects would also still need to meet the requirements set out in part 1 of the policy which includes consideration of landscape impacts.

Support for heat networks is noted. In response to representations from the University of Cambridge and Max Fordhams, additional wording has been added to part 10 of the policy to clarify that connection applies to major refurbishment and that heat networks should be low or net zero carbon.

Regarding the clarification sought as to what is meant by 'unacceptable impacts' on heritage assets, some additional guidance has been added to paragraph 4.49 of the supporting text. Further, more detailed guidance on works to heritage assets can also be found in policy GP/HA (Designated Heritage Assets).

With regards to recommendations from Abbey Developments that the policy should be amended to mandate that unacceptable impacts are appropriately addressed rather than suggesting automatic refusal of planning permission, additional wording has now been added to paragraph 1 of the policy to clarify that proposals will be supported provided that they do not cause unacceptable impacts that cannot be mitigated and are reversible. We have also amended part 7 of the policy as suggested. We do not agree that part 1 of the policy effectively rules out all agricultural land for renewable energy as the

criteria specifically relates to the need to steer development towards lower quality agricultural land and support is also given in the supporting text to proposals that retain agricultural use both within and around the proposals. With regards to criteria 5 and the retention of biodiversity net gain works where renewable energy projects are decommissioned, this can be worked into the long term management and maintenance plans for biodiversity net gain proposals.

In response to representations from Natural England, reference to peat soils has been added to part 1b of the policy.

With regards to data centres, consideration of data centres falls outside the scope of policy CC/RE. Reference to data centres has been added to policy I/EI (energy infrastructure masterplanning) and the co-location of data centres as part of energy networks will be encouraged.

Regarding concerns about the loss of agricultural land, policy CC/RE seeks to balance the need for renewable energy generation with the need for agricultural land in food production and food security. Proposals should avoid the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) and seeks to promote approaches that retains an element of agricultural use in and around the proposed renewable energy development.

A new addition to the policy in relation to community energy are criteria 8 and 9 which seek to encourage community benefit in the form of profit sharing or a proportion of community ownership. This responds to a government consultation on community benefits and shared ownership for low carbon energy infrastructure published in May 2025.

With regards to the policy lacking in detail as to enable the safeguarding of landscapes, biodiversity and community wellbeing, significant national policy guidance in the form of the PPG is available to assist in the determination of proposals, alongside other guidance from statutory consultees such as Natural England and Historic England. It is not necessary for the local plan to repeat this guidance.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy and for renewables.	202622 (C Pointon), 202961 (BCN Wildlife Trust), 202211 (R. Lambert), 203175 (CPPF), 202624 (C Pointon), 202171 (M MacGinley), 202852 (H Cook), 211874 (Defence Infrastructure Organisation)
Support for clause 1b in relation to protection of biodiversity and bullet point 5 requiring retention of BNG at the end of a projects operational life.	202961 (BCN Wildlife Trust), 203671 (Cambridge Green Party)
Historic England is supportive of renewable energy development and supports the inclusion of a policy for renewable energy. Our advice note Commercial Renewable Energy Development Historic Environment Advice Note 15 provides further advice on Local Plans and renewable energy including site selection and development of policies and maps in plans. This needs to be set out in robust policy criteria and in supporting text which is also reflected in the key of the policies map. We welcome	208923 (Historic England)

<p>references to heritage in the policy. However, we suggest a number of changes to wording to ensure that the policy and supporting text and policies map key is clearer and more robust.</p>	
<p>Historic England is supportive of renewable energy development and supports the inclusion of a policy for renewable energy.</p> <p>Our advice note Commercial Renewable Energy Development Historic Environment Advice Note 15 provides further advice on Local Plans and renewable energy including site selection and development of policies and maps in plans.</p> <p>We note that you have commissioned a Landscape Assessment – Part 2 Renewable Energy Development Assessment as part of the evidence base for the Local Plan. We note that this evidence has been used for the development of maps for solar and wind turbines which have then been used on the policies map.</p> <p>The assessment is mainly landscape focussed and does not appear to give detailed consideration to the historic environment (though there are some mentions of heritage e.g. church spires but more in relation to the wider landscape).</p> <p>Recognising the challenges in preparing a detailed and thorough assessment of heritage at a strategic scale, we consider that the mapping represents a helpful starting point, although there are some limitations. However, given the limitations of the mapping it is very important that the plan includes suitable strong caveats to help explain these limitations and also to set out what further heritage assessment will be needed at planning application stage.</p> <p>This needs to be set out in robust policy criteria and in supporting text which is also reflected in the key to the policies map. We welcome references to heritage in the policy. However, we suggest a number of</p>	<p>210171 (Historic England)</p>

<p>changes to wording to ensure that the policy and supporting text and policies map key is clearer and more robust.</p> <p>1e we welcome the reference to the historic environment and the setting of heritage assets. The Policy should also include reference to the need for detailed heritage impact assessment.</p> <p>Parts of the policy refer to a zooming study – whilst others refer to zoning – we assume the latter?</p> <p>Paragraph 4.51 After (LVIA) add ‘...and Heritage Impact Assessment (HIA)’</p>	
<p>Welcome the supporting text in relation to the loss of agricultural land and balances that must be struck between different competing land uses – too many solar farms could compromise nature recovery to address the biodiversity crisis by reducing land available for nature restoration and pitting nature restoration and food production against one another.</p>	202961 (BCN Wildlife Trust)
<p>Suggest that criteria 7 be clarified such that community led schemes will be supported as long as they protect or enhance landscape character with reference to policy S&GS 8 of the Stapleford and Great Shelford Neighbourhood Plan</p>	201566 (Stapleford PC)
<p>Welcomes proposals for Heat Network Zoning</p>	202211 (R Lambert), 203671 (Cambridge Green Party)
<p>Enforcement of some control areas needed especially in riverlands basins where it is especially concentrated</p>	202211 (R Lambert)
<p>There is a need for further guidance on what qualifies as “unacceptable impacts” to avoid delays in determining applications. Of particular significance is the assessment of the impact of renewables on heritage buildings where there is significant opposition to rooftop solar on older buildings.</p>	University of Cambridge (202471)

Principles of heat network are valid but seem to relate to new build only – should this also apply to major refurbishment?	University of Cambridge (202471)
Needs better alignment with the infrastructure chapter which refers to connections to gas networks and doesn't seem to require any statement on connecting to heat networks	University of Cambridge (202471)
Amend wording on continuation of agricultural uses to make clear that uses such as grazing can take place onsite around the equipment and is not referring to adjacent land	203175 (CPPF)
Strong support for encouragement of PV on existing buildings and above car parks	203671 (Cambridge Green Party)
Include explicit reference to energy storage and include specific reference to encouraging schemes to use energy onsite	203893 (Carbon Neutral Cambridge)
Policy should mandate that unacceptable impacts are appropriately addressed rather than suggesting automatic refusal of planning permission. The policy would also benefit from a balancing mechanism to allow for benefits to be weighed against any harm.	204724 (Abbey Properties Cambridgeshire Ltd)
Part 1 of the policy if applied literally could be seen as restricting proposals on agricultural land.	204724 (Abbey Properties Cambridgeshire Ltd)
Part 5 of the policy is unenforceable as decommissioning would take place at the end of life of the planning permission.	204724 (Abbey Properties Cambridgeshire Ltd)
Part 7 of the policy would benefit from the words 'for such proposals' being inserted after 'demonstrated'.	204724 (Abbey Properties Cambridgeshire Ltd)
Concerns raised about monitoring and compliance with the policy.	202624 (C Pointon)

Policy CC/RE supports renewable energy in principle and aligns with net-zero objectives, making it relevant to proposals such as Kingsway Solar. However, KSCA considers the policy insufficiently detailed to safeguard landscapes, biodiversity and community wellbeing from large-scale developments.	201791 (Kingsway Solar Community Action)
Transformers impact affects countryside tranquillity.	201930 (R Pargeter)
Concern about impact and loss of agricultural land to renewables.	201930 (R Pargeter)
Ecological enhancements and biodiversity around solar farms needs to be properly secured.	201930 (R Pargeter)
Concerns about lack of successful case studies of district heat networks in practice.	202171 (M MacGinley)
Support for low carbon initiatives and community led renewables.	203024 (M Cleminson)
Support for renewables part of the policy. But district heating must be low or zero carbon and have a decarbonisation strategy. Carbon intensity and efficiency of the heat network should be part of the feasibility study.	204480 (Max Fordham)
Concerns about renewables on peat soils.	207619 (Natural England)
Anglian Water supports the policy to facilitate the delivery of renewable energy schemes. We use land at or close to our operational sites to create solar arrays and generate renewable energy. It is an efficient way of maximising the space we have. We are also trialling an energy storage solution that will allow us to store excess solar energy generated during the day in batteries and use it at other times, helping us to reduce our reliance on energy from the grid.	210202 (Anglian Water Services)
Should any data centres be built in or adjacent to the Greater Cambridge to utilise capture of heat generated to support industry or domestic heating.	210324 (East England Ambulance Service NHS Trust)

<p>The National Trust is supportive of renewable energy in principle. However, the landscape character, tranquillity, sensitive views, and future Wicken Vision ambition are all being adversely affected by the amount of solar and associated infrastructure being developed in the Vision area. We note that the policy states that these developments should not cause unacceptable impacts, including cumulative and cross-boundary impacts, but consider that this policy could be strengthened to put the onus on the developer to undertake an assessment of cumulative and cross-boundary impacts. Furthermore, any proposed renewable energy/infrastructure that is within the Greater Cambridge area and is functionally linked to designated sites should be avoided.</p>	<p>208454 (The National Trust)</p>
<p>Support for policy but note that NSIPs are decided by SoS.</p>	<p>210479 (Kingsway Solar Community Action)</p>
<p>To avoid ambiguity, the policy could include wording such as: “Support for renewable energy development will not be afforded where proposals result in significant harm to landscape character, biodiversity, residential amenity or heritage assets that cannot be demonstrably avoided and acceptably mitigated. The climate benefits of renewable energy generation must be balanced against, and not automatically outweigh, these considerations.”</p>	<p>210480 (Kingsway Solar Community Action)</p>
<p>Policy CC/RE clause 7 – we suggest that clause 7 (community-led renewable and low-carbon initiatives) is clarified such that initiatives will be supported as long as they protect or enhance landscape character in line with other policies in the Development Plan. See Policy S&GS 8: Renewable energy schemes in Stapleford and Great Shelford for guidance.</p>	<p>210920 (Great Shelford PC)</p>
<p>Any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an</p>	<p>211875 (Defence Infrastructure Organisation)</p>

application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.	
Rural active travel routes should be bridleway to include horse riders.	203955 (S Rogers)

Policy CC/CE: Supporting a circular economy and sustainable resource use

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy from FECRA, Wildlife Trust, Cambridge City Council Democrat Group, ESCO Propsect, Cambridge Green Party, Mothers CAN Cambridge, Granta Park, Cambridge Green Party, Anglian Water, some developers and local residents.

Comments were made about concerns about prohibiting development coming forward and being obstructive to the development process. Concerns were raised about feasibility of the policy requirements and the consistency of their application, including about impacts on some individual developments. Concerns were also raised about Circular Economy Principles and conflation with WLC assessments, about references to nationally consistent methodologies including Part Z, and approaches to uses like life sciences which are much more unique. There were requests for practical and viable wording to show a pragmatic approach to applying and considering circular economy principles.

The County Council requested reference to the Cambridgeshire and Peterborough Minerals and Waste Local Plan and alterations to Paragraph 4.68. The Environment Agency asked for the policy to reflect more detailed consideration for post-development household waste, CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP), water scarcity and the requirement for waste permits.

Comments were also made about food waste storage and composting.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

The proposed approach to this policy draws on existing evidence and a wider need to both reduce use of materials and reduce carbon by re-using materials, building elements and where possible new buildings. The considerations of Circular Economy principles as set out in this policy are designed to be a consideration to inform good quality design decisions and contributing to reducing whole life carbon. It is not prohibiting development but ensuring relevant development goes through a consideration and assessment of what can be retained and re-used on or off site and how can the building be designed to extend the life of the building. The requirements for circular economy policies have been removed from site allocations to set out a clear position in CC/CE.

In response to the demolition of the Cambridge Leisure Park, this policy will apply to this development depending on when the planning application comes in. If the future use of the site is impeded by the current building and there is not scope for refurbishment, demolition will be accepted. The re-use of materials and building elements will be encouraged.

In response to concerns raised about monitoring and enforcement, a Sustainability Checklist is being developed to support the policies to provide both case officers and applicants details on what needs to be provided and how it will be considered and weighed up in the planning application.

In response to concerns about point 5 of the policy and the timing of the Circular Economy Statement requirement, similarly to the GLA approach to Circular Economy used successfully in London, a circular economy statement is required at submission

stage to demonstrate how the development has utilised the principles to consider the approach to the site and the re-use of buildings, building elements and details. It is asked for at this stage as these considerations will feed into the operational energy and whole life carbon calculations completed at this stage. An Outline scheme will require less detail than a Reserved Matters application and this will be set out in the supporting technical notes and sustainability checklist.

In response to Cambridgeshire County Council, suggested amendments have been made.

Definition of significant part has been added in part 4.62 of the policy in response to concerns.

There is no conflation with WLC. Circular Economy principles and assessments are about the re-use of materials and buildings and these considerations will reduce WLC as monitored and assessed in the WLC assessment. The two documents should speak to each other but have different purposes.

Nationally consistent methodologies including Part Z – this will be added in supporting technical notes and sustainability checklist. This will draw on national Carbon studies.

Approaches to uses like life sciences will be addressed on a case by case basis and further detail will be set out in supporting technical notes and sustainability checklist.

In response to the Environment Agency, the supporting technical note will reflect more detailed consideration for post-development household waste, water scarcity and the requirement for waste permits. The policy wording has been revised to include CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP).

Food waste storage and composting is encouraged and supported by the wider approach to waste management by Cambridgeshire and Peterborough Combined Authority who is the responsible body for waste.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy.	205192 (FECRA), 205516 (BCN Wildlife Trust), 202917 (Cambridge City Council Liberal Democrat Group), 203185 (ESCO Prospect), 203672 (Cambridge Green Party), 204905 (Mothers CAN Cambridge), 201820 (T McKeown), 203366 (Carter Jonas on behalf of BMR Granta Park Propco Limited), 210203 (Anglian Water Services), 210296 (Vistry Group), 210603 (Turley on behalf of Imperial War Museum), 210921 (Great Shelford PC), 210891

	(Turley on behalf of Kings College)
Concerns raised about proposals to demolish the Cambridge Leisure Park complex.	201243 (S Williams)
Need to be clear on who 'performance will be monitored and reported' relates to (to whom will it be reported).	202917 (Cambridge City Council Liberal Democrat Group)
Supportive of circular economy principles but object to clause 2 as it does not reflect the specialist needs of life sciences facilities which need a specialist approach as well as other development types where there is a need to consider site-specific factors and viability. A more balanced approach is needed, and it is requested that "on an exceptional basis" is removed from the policy.	203366 (BMR Granta Park PropCo Limited), 204315 (CIP)
Concerns that opportunities for reuse and retrofit are not being proactively assessed, e.g. by bringing empty or under-used buildings back into use.	203672 (Cambridge Green Party)
Include a clearer and stronger requirement on reducing embodied carbon providing more guidance on retrofit best practice and the use of low carbon and carbon storing materials to future-proof delivery.	203672 (Cambridge Green Party)
Call for clear, nationally consistent methodologies for circularity requirements, potentially through a future Part Z of the Building Regulations.	204315 (CIP)
Recommendation to strengthen the policy with reference to lean design at point 1 to reduce embodied carbon through efficient structures and avoiding basements and cantilevers.	204905 (Mothers CAN Cambridge)
Emphasise intensity of land use as a consideration for demolition where it is likely to provide buildings that might otherwise be built on virgin soil (or peat outside of the city) with reference to policy CC/CS.	204905 (Mothers CAN Cambridge)

Recommend a pre-demolition audit as part of Circular Economy Statement for major projects and for projects of any size where the materials have significant heritage value or unusual reuse potential.	204905 Mothers CAN Cambridge)
Part 1 of the policy is deemed unnecessary as this issue is addressed in part 8 of policy CC/NZ.	205200 (Home Builders Federation)
No support in the NPPF for a presumption in favour of repairing or refurbishing existing buildings over their demolition or reuse. Approach could hinder development on previously developed land, lead to lower densities and hinder ability to meet standards for outdoor space, BNG and accessible units.	205200 (Home Builders Federation)
Provision of Circular Economy Statements for developments of 150 or more dwellings is considered unnecessary and could be incorporated into Sustainability Statements instead.	205200 (Home Builders Federation)
RECAP waste Management Design Guide is not part of the development plan and as such requirement for compliance with this is problematic	205200 (Home Builders Federation)
All assessments of claimed "New Zero Carbon" buildings should include embodied carbon of demolitions (with ref to Westminster Retrofit First policy)	205395 (J Preston)
Concerns raised about circular economy and re-use of food citing Cambridge Central Market as a good example.	202485 (J Neal)
Review wording criteria 2d as it may hinder a balanced assessment of the merits of retention versus demolition.	202794 (Carter Jonas on behalf of Trinity Hall)
Concerns raised about monitoring and enforcing the policy.	202855 (H Cook) 203029 (M Cleminson)

Clarity is needed relating to what constitutes a significant part of the building. Concerns are about circumstances where development may be justified being restricted.	203400 (Bidwells on behalf of Babraham Research Campus Ltd) 204301 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Rural active travel routes should be bridleway to include equestrians.	203957 (S Rogers)
Concern raised that there are not enough repair shops, especially in rural areas.	203987 (Histon and Impington PC)
Objections to the proposed wording of Policy CC/CE. Supportive of objectives but the requirement for a Circular Economy Statement goes beyond best practice and risks conflation with whole life cycle carbon requirements.	204344 (Bidwells on behalf of Tritax Big Box Developments)
Support the policy but it should be strengthened by referencing lean design and the intensity of land use should be a consideration for demolition where it could be built on virgin soils.	204485 (Max Fordham) 205478 (Max Fordham)
Concerns about policies impact on site viability and other factors such as affordable housing delivery. A more balanced approach is needed that allows for demolition and redevelopment to meet NPPF objectives for sustainable growth and quality housing.	204796 (Carter Jonas on behalf of Hill)
Further clarity is needed on the scope and methodology for circularity assessments and their integration with whole life carbon assessments.	204796 (Carter Jonas on behalf of Hill)

<p>Circularity requirements should align with existing policy thresholds and be supported by clear methodologies, potentially through a new Part Z of the Building Regulations.</p>	<p>204796 (Carter Jonas on behalf of Hill)</p>
<p>Object to the proposed wording of policy CC/CE, despite supporting its objectives and circular economy principles. Request clarity on the term 'significant part' in relation to the demolition of buildings to avoid ambiguity in policy interpretation. While supporting the emphasis on retrofit, it is suggested that the policy should allow for other material benefits that may justify demolition. Recommend adding flexibility to the policy to permit demolition and redevelopment if refurbishment or reuse is not viable.</p> <p>Changes to plan: Confirmation on the definition of a 'significant part' Recognition in the policy that there may be other planning benefits that outweigh presumption in favour of retrofit.</p>	<p>204301 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)</p>
<p>We commend the inclusion of circular-economy principles that enable operational waste management and composting for new developments.</p>	<p>208188 (Cambridgeshire Sustainable Food)</p>
<p>The circular economy policy already supports operational waste management and composting. We recommend making food waste and surplus redistribution more explicit, by requiring (particularly in major schemes and mixed-use centres):</p> <ul style="list-style-type: none"> ● separate, convenient food waste storage for homes and food businesses (designed for easy collection) ● design that enables community composting where appropriate ● practical space that can support surplus food redistribution in neighbourhood hubs (small “last mile” storage/handling space can be transformational). 	<p>208193 (Cambridgeshire Sustainable Food)</p>
<p>We back the circular-economy principles that enable operational waste management and composting.</p>	<p>206958 (Cambridgeshire Sustainable Food)</p>

<p>Make food-waste storage, community composting and surplus-food redistribution facilities mandatory in major schemes and mixed-use centres.</p>	<p>206963 (Y Dignon)</p>
<p>A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.</p> <p>Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.</p> <p>Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.</p>	<p>210351 (Community Campaigner D Barton)</p>
<p>Girton College broadly supports the intent of Policy CC/CE and welcome the flexibility built into paragraph 1 of the policy, which allows proposals to demonstrate compliance with the circular economy principles where “practical and viable” to meet all requirements in full.</p>	<p>208307 (Turley on behalf of Girton College)</p>
<p>Concerns raised about point 5 – requiring a CE statement as it requires it at submission stage not detailed design stage.</p>	<p>210297 (Vistry Group), 208307 (Turley on behalf of Girton College), 210603 (Turley on behalf of Imperial War Museum), 210981</p>

	(Turley on behalf of Kings College)
Reference to the Cambridgeshire and Peterborough Minerals and Waste Local Plan is supported. Amendments suggested to Paragraph 4.68.	210546 (Cambridgeshire County Council)
We note the inclusion for developers to consider waste management for all proposals. However, there is a lack of detail on post-development household waste management including Persistent Organic Pollutants, hazardous or problematic waste streams and the support of the circular economy. Reference should be included on how future growth will be supported by adequate infrastructure such as Household Waste Recycling Centres, recycling hubs, Waste Treatment Stations, Incinerators and treatment capacity.	211159 (Environment Agency)
It has been noted that water scarcity is a concern for the local plan, please note that water is generally required alongside waste operations for the purpose of dust suppression and fire prevention. This would need to be considered in relation to any waste management infrastructure required as per the point above. It may also be required by constructors for dust suppression during building works.	211160 (Environment Agency)
Please ensure that Contractors are aware of the potential requirement to obtain Waste Permits and/or apply under DoWCoP in relation to construction waste.	211161 (Environment Agency)
We would recommend revision to reflect the following comments for waste management in the context of land contamination/remediation: Excavated materials recovered on a development site via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP) subject to certain conditions being met. This is sustainable	211162 (Environment Agency)

<p>approach. However, contaminated materials that are or must be disposed of are waste and must be managed in accordance with the relevant legislation. We recommend that the following guidance be referenced: The Definition of Waste: Development Industry Code of Practice; and The Waste Management page on gov.uk.</p>	
<p>As drafted, it is insufficiently precise, not effectively enforceable, and risks duplication with existing regimes. The policy is vague in its duties, lacking clear enforceable requirements.</p>	<p>208968 (Persimmon Homes East Midlands)</p>
<p>It is important that the reference in 1. to “where practical and viable” is retained in the Policy and that “where practical and viable” is similarly referenced in Policy S/CBN: Cambourne North 48 where is states “integrate circular economy principles into design (including Zero Avoidable Waste in construction, maximising opportunities for reuse and recycling of materials across whole life-cycle) and will encourage zero waste living in operation for future residents through provision of services and facilities.</p>	<p>208263 (Martin Grant Land Limited)</p>

Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

A number of comments expressed general support for the policy. Natural England supported in principle, but requested a number of changes, to provide detail on the approach to soil management. Concern was expressed that requirements to explore carbon sequestration duplicated other policy requirements such as biodiversity net gain. Another comment considered the policy was too vague to be appropriately implemented. Some comments highlighted the need to avoid allocations on peat areas. The Cambridge Green Party proposed that the policy to be widened to include soils, grassland, woodland, wetlands

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Peatlands are a particularly important store of carbon, and need a specific policy approach. A number of amendments have been made to the draft policy, including to add detail to the approach to soil management reflecting comments from Natural England.

land-based carbon sequestration opportunities go beyond application of biodiversity net gain, and it is a reasonable and appropriate requirement to require developers to explore and implement opportunities.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for policy.	201350 (Royal Society for Protection of Birds (RSPB), 201567 (Stapleford PC), 202488 (J Neal), 204913 (Mothers CAN), 205480 (Max Fordham),205517 (Wildlife Trust BCN), 208264 (Savills on behalf of Martin Grant Land Limited), 210922 (Great Shelford PC)
<p>The general principles of this policy are welcomed, however, Natural England does not support part 2a of Policy CC/CS which allows sites to be allocated on peat soil, or for those allocations which are later discovered to be on peat to proceed. Part 4 refers to the removal of peat soils. We advise strengthening this, along the lines of 'If there are any exceptional proposals allowed by the LPA to remove peat soils, this must only be done with the guidance and supervision of a suitably qualified and experienced soil scientist / practitioner, to an approved plan. The peat must be appropriately stored and then eventually used, all in a way that would limit carbon emissions into the atmosphere as far as possible.'</p> <p>We also note that part 4 refers to the DEFRA Code of Practice, however, the current (2009) version</p>	207620 (Natural England)

<p>does not mention peat, which requires specialist handling techniques. Refer to: Broads Authority Guide to understanding and addressing the impact of new developments on peat soil. We also advise that it should be made clear that tree planting on areas of peat is not normally appropriate as this contributes to the drying and wasting of peat, therefore releasing carbon rather than storing it as intended. Please see Appendix 1 for additional comments relating to peat soils.</p>	
<p>There should be offsetting included in the policy where carbon sinks are damaged or removed.</p>	<p>202625 (C Pointon), 203033 (M Cleminson),</p>
<p>Policy should explicitly protect significant existing carbon stores, including soils, woodlands, grasslands and wetlands, not just peatlands or future sequestration opportunities. Concerns raised about the wording allowing harmful exceptions.</p>	<p>203673 (Cambridge Green Party)</p>
<p>Rural active travel routes should be bridleway to include equestrians.</p>	<p>203959 (S Rogers)</p>
<p>The policy reads as an extension to the Biodiversity Net Gain process rather than clearly defining requirements for carbon sequestration. The respondent suggests that opportunities for carbon sequestration should be proportionate, evidence-based, and appropriate to the site's scale and nature, considering landscape and ecological practices. There is uncertainty regarding how schemes will demonstrate a 'meaningful' level of carbon sequestration alongside significant BNG.</p>	<p>204357 (Bidwells LLP on behalf of Tritax Big Box Developments)</p>
<p>Concerns raised that allocation sites that are identified on peat based soil locations should not be supported. In this case it would be preferable to demolish an existing building on brownfield site (reference policy CC/CE) and intensify density there.</p>	<p>204913 (Mothers CAN), 205480 (Max Fordham),</p>
<p>The policy should be strengthened by requiring a soil management plan on larger allocation sites regardless of whether they contain peat.</p>	<p>205480 (Max Fordham)</p>

<p>Natural England does not support part 2a of Policy CC/CS which allows sites to be allocated on peat soil, or for those allocations which are later discovered to be on peat to proceed. Part 4 refers to the removal of peat soils. We advise strengthening this. Note that part 4 refers to the DEFRA Code of Practice, however, the current (2009) version does not mention peat, which requires specialist handling techniques. Refer to: Broads Authority Guide to understanding and addressing the impact of new developments on peat soil.</p>	<p>620 (Natural England)</p>
<p>Support the principle of enhancing land-based carbon sequestration and green infrastructure but raises concerns that Policy CC/CS exceeds industry guidance and established practice. The policy reads as an extension to the Biodiversity Net Gain process rather than clearly defining requirements for carbon sequestration. Opportunities for carbon sequestration should be proportionate, evidence-based, and appropriate to the site's scale and nature, considering landscape and ecological practices. There is uncertainty regarding how schemes will demonstrate a 'meaningful' level of carbon sequestration alongside significant BNG. Policy CC/CS should allow flexibility for outcomes to align with established guidance rather than imposing prescriptive expectations that exceed standards.</p>	<p>204357 (Bidwells on behalf of Tritax Big Box Developments)</p>
<p>Support for general principles but part 2a needs to be strengthened, instead of referring to DEFRA Code of Practice in part 4 refers to the Broads Authority Guide. The policy should be clear that tree planting on areas of peat is not normally appropriate as this contributes to the drying and wasting of peat, therefore releasing carbon rather than storing it as intended.</p>	<p>207620 (Natural England)</p>
<p>Support for policy. The wording of Policy CC/CS should include an additional numbered point to reinforce the need to consider the link between the impact of proposed development on water availability and peat condition.</p>	<p>208455 (The National Trust)</p>

<p>The policy introduces undefined obligations resulting is a policy that is overly vague, lacks objective compliance tests, and is potentially unenforceable in development management.</p>	<p>208969 (Persimmon Homes East Midlands)</p>
<p>There could be the opportunity for overall carbon benefits with a suitable peat restoration plan which should be encouraged within the policy to allow developers the flexibility to build new homes whilst protecting or enhancing valuable peat soils.</p>	<p>210298 (Turley on behalf of Vistry Group)</p>
<p>The BHS objects because the policy should recognise that natural-surface public rights of way, including bridleways and restricted byways, can contribute positively to these objectives when appropriately designed and managed.</p>	<p>203564 (British Horse Society)</p>
<p>Rural active travel routes should be bridleway to include equestrians</p>	<p>203959 (S Rogers)</p>