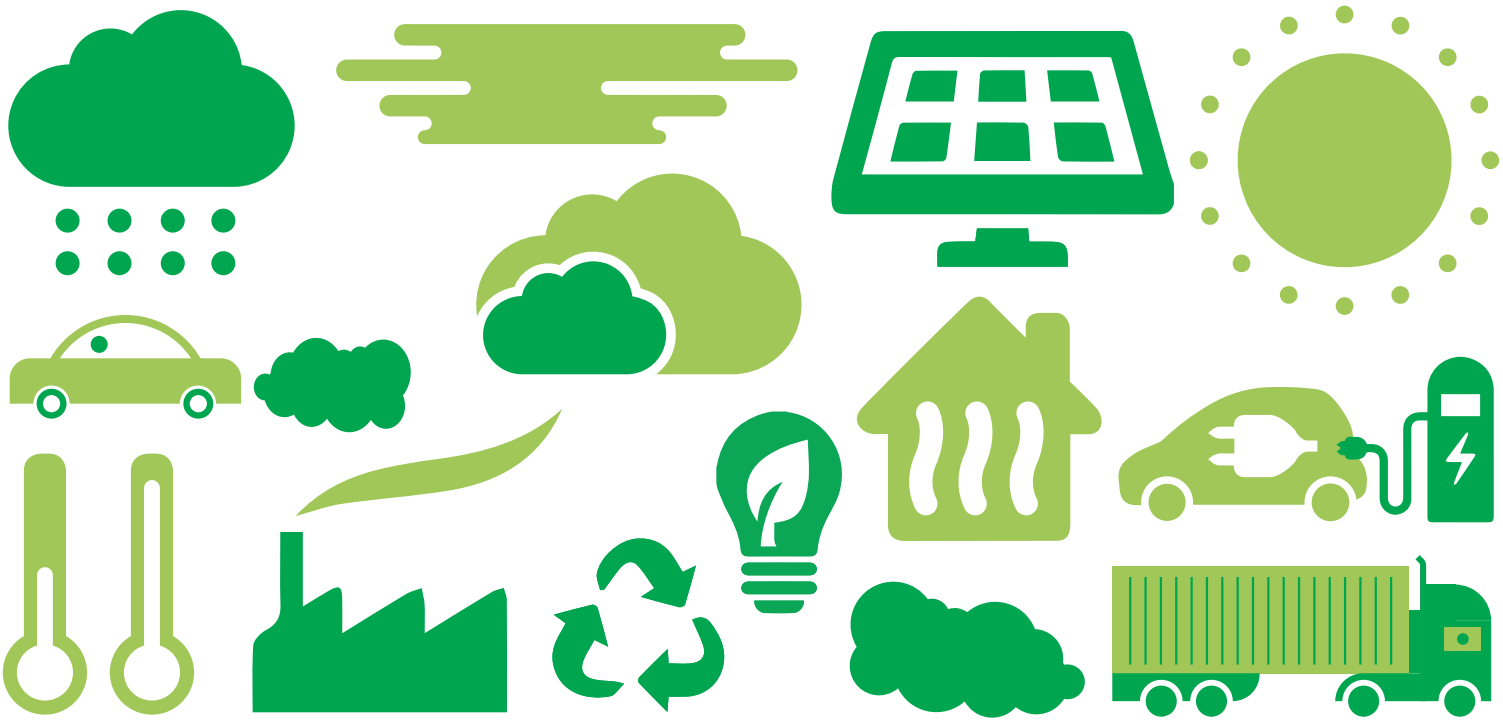
Climate Change
Topic Paper



Greater Cambridge Local Plan

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

GREATER CAMBRIDGE
SHARED PLANNING

Topic Paper: Climate Change

1. Introduction and purpose

1.1 This is one of nine topic papers produced to accompany the Proposed Submission (Regulation 19) consultation on the Greater Cambridge Local Plan. The topic papers are:

- Development strategy (with appendices)
- Site allocations
- Climate change
- Biodiversity and green spaces
- Wellbeing and social inclusion
- Great places
- Jobs
- Homes
- Infrastructure

1.2 All of the papers can be found on the Greater Cambridge Shared Planning website as part of the document library for this stage. The topic papers set out how each policy under the relevant Local Plan 'theme' has been updated following on from the Draft Local Plan stage. As such, the topic papers support and complement the Proposed Submission consultation document as they provide a detailed explanation of the basis for each policy.

1.3 The topic paper has a section for each policy which sets out:

- Policy context update – Any national or local policy changes, or other context changes which impact on the policy approach.
- New or updated evidence – Highlighting where new evidence has been prepared since the draft plan stage.
- Additional alternative approaches considered – If any additional reasonable alternative approaches were identified to the policy.
- Proposed approach – changes that have been made to the approach in the

Draft Loca Plan, and why they have been made.

1.4 Representations received at previous stages, including to the Draft Local Plan consultation, are summarised in the Statement of Consultation. This also includes responses to the issues raised.

1.5 The topic papers at previous consultation stages including those which accompanied the Draft Local Plan as are still available to view in our document library.

1.6 The Local Plan is supported by a wide range of evidence which can be found in our document library. Key supporting documents to the plan include:

- Statement of Consultation
- Sustainability Appraisal
- Habitats Regulations Assessment
- Equalities Impact Assessment (EQIA)

1.7 A draft NPPF was published for consultation on 16 December 2025 with comments required by 10 March 2026. The two Councils have submitted their response to this consultation. A final version of the NPPF has not yet been published at time of preparation of the Proposed Submission Local Plan. As a legacy plan, being prepared under the previous plan making system, transitional arrangements mean that the soundness of the Local Plan will be considered against the National Planning Policy Framework December 2024.

2. Climate Change policies

2.1 The following proposed policies areas are addressed in this topic paper:

- CC/SD: Sustainable development and the climate emergency
- CC/DC: Designing for a changing climate
- CC/NZ: Net zero carbon new buildings
- CC/WE: Water efficiency in new developments
- CC/IW: Integrated water management, sustainable drainage and water quality
- CC/FM: Managing flood risk
- CC/RE: Renewable energy projects and infrastructure
- CC/CE: Supporting a circular economy and sustainable resource use
- CC/CS: Supporting land-based carbon sequestration and carbon sinks

2.2 An additional policy has been added subsequent to the Draft Local Plan stage:

- CC/SR: Sustainable retrofit

3. Proposed Submission Local Plan update to CC/SD: Sustainable development and the climate emergency

Policy context update

3.1. No additional policy context update.

New or updated evidence

Net Zero Evidence Addendum (2026)

3.2. An addendum to the Climate Change Topic Paper, a Net Zero Evidence Addendum document has been prepared by officers and reviewed by Bioregional. The purpose of this Addendum is to provide implementation guidance to support the application of existing Policies CC/SD, CC/NZ and CC/CE, and the new policy Sustainable Retrofit. It considers how information submitted as part of a planning application should be presented, reported and, where a development cannot meet the standard, how this should be negotiated. This Addendum does not provide further policy justification, numerical targets, definitions of net zero carbon, or viability considerations, all of which are already comprehensively addressed through the Climate Change Topic Paper and the supporting net zero evidence base, which together sets out the justification for the climate policies in the emerging Greater Cambridge Local Plan – this Addendum should be read alongside those documents. Rather, the purpose of the Addendum is to provide clarity, consistency and certainty on how the proposed policies are applied, and how policy compliance would be evidenced, negotiated and secured through the planning process.

Additional alternative approaches considered

3.3. No additional alternative approaches identified.

Proposed approach

3.4. This policy has been reviewed against the representations received and reviewed for clarity of expression. The only change is to the supporting text in response to the Environment Agency comments.

4. Proposed Submission Local Plan update to CC/DC: Designing for a changing climate

Policy context update

4.1 The Future Homes Standard published to replace Building Regulation Part L has not been updated with regard to any issues relating to overheating or adaptation of buildings for Climate Change. It is anticipated that a revised Building Regulation Part O for Overheating will be updated.

New or updated evidence

4.2 No additional evidence update.

Additional alternative approaches considered

4.3 No additional alternative approaches identified.

Proposed approach

4.4 The following amendments have been made to the Draft Plan policy:

- Point 1 has been amended to reflect the role of green infrastructure in mitigating against the urban heat island effect. This is in response to comments from local residents about the Local Plan needing to mitigate against the urban heat island effect and utilising nature based solutions.
- Point 2 and 2a-d have been added into the policy to set out in more detail the application of the cooling hierarchy and the considerations at each stage of the hierarchy to reduce the amount of heat entering the building, then prioritising passive cooling before looking to mechanical cooling.
- Point 4 about cross ventilation has been removed due to representations considering this point to be too onerous. Cross ventilation remains best practice in designing for mitigating heat risk and point 1b has been modified to set out that the preference is for cross ventilation, but where this cannot be achieved justification would need to be provided to assess its acceptability.

- The supporting text has been rationalised and the requirements brought into policy to reinforce the need to address these considerations in mitigating against overheating, and in response to representations received on this policy. The supporting text has also been revised to set out how the policy would be applied to buildings, streets and places to reduce overheating in internal and external micro-climates. The supporting text has been revised to address nature based solutions to overheating such as greening and referring to evaporative cooling. Additional resources such as Shading for Housing: Design Guide for a changing climate (2023) have also been added to the supporting text to support in the assessment of policy.
- Minor amendments have been made to the policy for clarity of expression.

5. Proposed Submission Local Plan update to CC/NZ: Net zero carbon new buildings

Policy context update

5.1 On 24th March 2026, MHCLG published the Future Homes Standard (FHS), the next revision to Part L of the Building Regulations in England. The FHS is intended to set out new energy efficiency standards for new housing, putting it on a trajectory towards net zero carbon through electricity grid decarbonisation and through having some on-site solar PV in most cases. These standards will come into force on the 24 March 2027 followed by a 12-month period of transitional arrangements1 for non-higher risk building work.

5.2 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. A comparison of the requirements of the FHS and Policy CC/NZ is provided in Table 1 below.

5.3 Table 1: Comparison of Part L requirements and Policy CC/NZ.

Building element	Current (Part L 2021)	Part L 2026 (Future Homes Standard)	Policy CC/NZ
Fabric	[baseline]	No change to insulation. Small improvement to airtightness.	Enhanced levels of fabric performance with excellent air tightness[2]
Heating and hot water	Gas boiler	Heat pump and waste water heat recovery.	Heat Pump
Solar PV	40% of ground	Circa 40% of	Sufficient solar to meet

	floor area	ground floor area; but this will vary (and none if there is any storey of 18m or taller).	the annual energy demands (regulated and unregulated) of the dwelling[3]
Ventilation	Natural + intermittent extract fans	Decentralised mechanical extract ventilation (dMEV)	MVHR 88% heat recovery SFP <0.45Wh/m^3
Space heat demand kwh/m^2/year	13–47 (SAP[4,5]) or 32-82 (PHPP[6,7,8,9])	Varies between 32 – 50kWh/m^2 (PHPP[10])	15 – 20 kWh/m^2/year (which would be measured using PHPP or similarly accurate methodology, not SAP)

5.4 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[11] 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.

New or updated evidence

Net Zero Evidence Addendum (2026)

5.5 An addendum to the Climate Change Topic Paper a Net Zero Evidence Addendum document has been prepared by officers and reviewed by Bioregional. The purpose of this Addendum is to provide implementation guidance to support the application of existing Policies CC/SD, CC/NZ and CC/CE, and the new policy Sustainable Retrofit. It considers how

information submitted as part of a planning application should be presented, reported and, where a development cannot meet the standard, how this should be negotiated. This Addendum does not provide further policy justification, numerical targets, definitions of net zero carbon, or viability considerations, all of which are already comprehensively addressed through the Climate Change Topic Paper and the supporting net zero evidence base, which together sets out the justification for the climate policies in the emerging Greater Cambridge Local Plan – this Addendum should be read alongside those documents. Rather, the purpose of the Addendum is to provide clarity, consistency and certainty on how the proposed policies are applied, and how policy compliance would be evidenced, negotiated and secured through the planning process.

Viability Assessment (2026)

5.6 The Local Plan has also been subject to a whole plan Viability Assessment, to test that proposed policies are realistic and capable of being delivered by developers alongside the infrastructure they would need to deliver or fund. Following the Regulation 18 consultation on the Draft Plan, the assessment was revised to reflect recent proposed changes to policies, where these would have a direct impact on development viability, and test a different range of development typologies which more closely reflects the final proposed site allocations. The assessment demonstrates that developments are viable when the requirements of the Local Plan are considered, and will be able to contribute effectively to the delivery of infrastructure.

Additional alternative approaches considered

5.7 No additional alternative approaches identified.

Proposed approach

5.8 The following amendments have been made to the Draft Plan policy:

- The policy has been reviewed for clarity of expression and consistency, this has resulted in minor changes to wording including the use of Energy Statement not Energy Assessment.
- To recognise that other non-residential uses may have a different EUI more appropriate to the energy demand for their use, point 4x. has been added to Part B of the policy to set out that - All other non-residential uses: Equivalent to the UK Net Zero Carbon Buildings Standard 2030 targets (and sub-typologies where available).
- In response to representations highlighting a gap in the inclusion of energy demand flexibility and battery storage, this has been added to Part C of the policy.
- Under Part D Energy Offsetting and Assured Energy Performance, point 9 has been added to set out that for reporting purposes, all development over 50 homes and 5,000sqm of employment floorspace should complete in-use energy monitoring. This is in response to comments about clarity of what is expected to be completed by developers and what is proportionate to complete.
- The Net Zero Carbon Buildings requirement for embodied carbon and Whole Life Carbon Assessments has been refined reflecting on the Net Zero Carbon Addendum to the Climate Topic Paper, and the need for clarity on what the ask is here and ensuring that the implementation of a Whole Life Carbon Assessment is clearer. This is also in response to a number of representations expressing the need to ensure whole life cycle carbon is considered in planning applications.
- In the supporting text, a table has been added to set out how specific standards will apply for different sustainability standards and any other standards deemed to comply with elements of policy CC/NZ (note this can apply to all scales of development). This is in response to representations which set out a need to understand how the policy would be implemented and how developers would be held to the environmental standards in the policy. The Net Zero Carbon Addendum to the Climate Topic Paper has also informed this section of the supporting text as

Bioregional have advised how these standards should be applied.

6. Proposed Submission Local Plan update to CC/WE: Water efficiency in new developments

Policy context update

6.1 The Government published a draft National Planning Policy Framework in late 2025. Whilst this local plan, as a legacy plan, will be considered against the NPPF 2024, it is worth noting that the proposed updated guidance continues to identify that plans may set local water efficiency standards.

New or updated evidence

Viability Assessment (2026)

6.2 The Local Plan has also been subject to a whole plan Viability Assessment, to test that proposed policies are realistic and capable of being delivered by developers alongside the infrastructure they would need to deliver or fund. Following the Regulation 18 consultation on the Draft Plan, the assessment was revised to reflect recent proposed changes to policies, where these would have a direct impact on development viability, and test a different range of development typologies which more closely reflects the final proposed site allocations. The assessment demonstrates that developments are viable when the requirements of the Local Plan are considered, and will be able to contribute effectively to the delivery of infrastructure.

Cambridge Area Water Supply Evidence Addendum (2026)

6.3 The draft Local Plan was informed by the 'Cambridge Area Water Supply Evidence' (2025) which demonstrated how water would be available to meet the needs generated. An Addendum to the study (2026) has been produced to accompany the Proposed Submission Plan. This looked at representations made to the Draft Plan in relation to water supply. It also updated the analysis by using the most up to date development trajectories for both Greater Cambridge and the part of Huntingdonshire District Council that falls with the Cambridge Water supply area. This showed slightly lower housing numbers than the previous study due to the removal of the North

East Cambridge development from the trajectory, but this did not change the previous conclusions.

Additional alternative approaches considered

6.4 No additional alternative approaches identified.

Proposed approach

6.5 The following amendments have been made to the Draft Plan policy:

- Deletion of paragraph 1 of the policy. Many representations were received saying that it was not for individual applicants to demonstrate that there will be an adequate water supply to serve the development. Cambridge Water have a duty to produce a Water Resources Management Plan (WRMP) every five years, which is approved by Government and sets out how water demand and supply will be balanced in a sustainable way. The Councils have engaged with both Cambridge Water and Anglian Water by providing information about future growth and the phasing of this in order to align plans as best as possible and allow time to plan for additional infrastructure. The WRMP is reviewed every five years to take into account changes in growth and the funding that will be necessary to improve infrastructure in a timely manner. Developers will need to apply to Cambridge Water for a connection to the water supply network, and whilst there is a duty to connect for housing development, Cambridge Water are currently restricting non-household connections to below 20m3/day. This section was therefore removed as it is straying into the water planning process. The primary focus of the policy is to ensure that development is built to a highly water efficient design to minimise consumption of water and protect water resources, which is made clear at the beginning of the policy.
- Previous paragraph 2a. Deletion of reference to changes to water legislation. Representations were received that a policy cannot rely upon future legislation changes and whilst changes relating to wholesome

water will enable water recycling to be easier as systems may then be able to be adopted by water companies, this does not necessarily preclude water recycling currently. There are already examples of housing schemes that use rainwater harvesting to supply water to toilets at Eddington, Knights Park and Virido in Cambridge and which have been developed without a need for a change to water legislation.

- Previous paragraph 2b. Representations were received that by including a range of between 90-100l/p/d for developments of less than 100 dwellings may result in the default for developments being 100 l/p/d. Given the serious water scarcity in the area, the tighter level has therefore been chosen. Specifications in the Future Homes Hub – Water Ready report (2024) shows that 90l/p/d can be achieved without water reuse and with an extra cost of £750 per dwelling which is feasible and viable.
- Previous paragraph 2c. Since the Draft Plan was published, the BREEAM Wat01 credit has been updated from Version 6.1 to Version 7 (see table below for changes). Previously 5 credits meant a 55% improvement in water efficiency. Under Version 7 this would be a 75% improvement which is a considerable uplift and we do not have any evidence yet that it would be achievable. As a result, the Wat01 requirement for non-household developments has been changed to requiring 4 credits as a more reasonable level at a 60% improvement and which is similar to before. In addition, although BREEAM is currently the industry standard, there is a recognition that an equivalent 60% reduction could be shown.

Table Showing Amendments to BREEAM Standards

WAT01 no.credits	BREEAM V6.1 % Wat01 improvement	BREEAM V7 % Wat01 improvement
1	12.5	15
2	25	30
3	40	45
4	50	60
5	55	75

- Previous paragraph 2d. Wat05 has been added to the policy, which requires projects to predict operational water consumption and commit to

monitoring. This is an additional category in the updated BREEAM Version 7.

- In response to a request from the Environment Agency, an additional section has been added to the policy relating to data centres to ensure that they are as water efficient as possible.

7. Proposed Submission Local Plan update to CC/IW: Integrated water management, sustainable drainage and water quality

Policy context update

7.1 No additional policy context update.

New or updated evidence

Greater Cambridge Detailed Water Cycle Study Wastewater Addendum (2026)

7.2 A Detailed Water Cycle Study Wastewater Addendum (2026) has been produced to accompany the proposed submission stage. This explores further issues related to wastewater infrastructure and proposed new development. Appendix A of the study responds to detailed comments made by the Environment Agency on the Detailed Water Cycle Study (2025).

Additional alternative approaches considered

7.3 No additional alternative approaches identified.

Proposed approach

7.4 The following amendments have been made to the Draft Plan policy:

- Insertion of a reference to natural flood management techniques in paragraph 1 alongside nature-based solutions that was already in the policy. The Environment Agency recommended that development proposals in flood risk areas demonstrate 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.
- Paragraph 4 has been strengthened in a few places in line with comments received, to ensure that SuDS are an integral part of the design of a development and have been fully incorporated and that they avoid pollution entering both groundwater and watercourses. In relation to the

future management and maintenance of SuDS, the policy includes the addition of who will be responsible, and the supporting text is clear that this would be included in the legal agreement. This is in response to representations that said this had been an issue in the adoption of SuDS, where unclear ownership had led to the risk of management not being carried out.

- Paragraph 6 in relation to water quality includes additional text as a result of comments received. This is now clear that some types of SuDS may be unsuitable in areas of contaminated land, with additional information provided in the supporting text. It has also been strengthened to be clear that foul drainage should connect to a mains public sewer.
- Additional text has been added to the supporting text that developers are encouraged to undertake early engagement with the wastewater service provider Anglian Water to confirm that there is capacity and that this is provided before first occupation. If there is a risk that this might not happen then phasing conditions would be attached to the planning consent in order to ensure that there would not be a risk to water quality as a result of the new development.

8. Proposed Submission Local Plan update to CC/FM: Managing Flood Risk

Policy context update

Flood Map for Planning

8.1 The Flood Map for Planning was updated in August 2025, displaying the climate change impacts on fluvial flood risk as a combined layer using the Environment Agency's 2070 – 2125 climate change model.

Flood risk and coastal change PPG

8.2 Guidance on the application of the Sequential Test in plan making and decision making was modified in September 2025.

How to prepare a strategic flood risk assessment PPG

8.3 Guidance on mapped flood risk from all sources and accounting for the expected effects of climate change was modified in 2026, including references to updated sources of flooding and flood risk data.

New or updated evidence

Greater Cambridge Flood Risk Sequential Test Update (2026)

8.4 The updated flood risk information in the Flood Map for Planning was taken into account in the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) and the Greater Cambridge Flood Risk Sequential Test Update (2026) to ensure that the Local Plan's evidence base makes use of the most up-to-date flood risk data.

8.5 The Greater Cambridge Flood Risk Sequential Test Update (2026) considered the changes made to flood risk data described above and a number of amendments to the proposed site allocation boundaries including a new site. It found that for the proposed allocations, the flood risk from all sources, including climate change, has either not changed or there are minor changes, and the level and nature of flood risk remain broadly consistent with the results of the previous Flood Risk Sequential

Test (2025). Where site boundaries have changed, this has not increased the risk of flooding and the new site at Milton Road Garages is considered to be at a 'low risk' of flooding from all sources.

8.6 The Sequential Test Report Update also reviewed the Greater Cambridge Level 2 Strategic Flood Risk Assessment (SFRA) (2025) to see if the minor changes would alter the relevancy of previous site specific flood risk conclusions and mitigation measures. The Sequential Test Report illustrates that the recommendations made by the Level 2 SFRA are still applicable. As a result there is no change to the previous conclusion that the Sequential Test is passed and the exception test is not required for the proposed site allocations.

Additional alternative approaches considered

8.7 No additional alternative approaches identified.

Proposed approach

8.8 The following amendments have been made to the Draft Plan policy:

- Part 1 has been amended to clarify that the policy would also apply to change of use proposals, responding to comments by the Environment Agency;
- Part 1a has been amended to clarify it would apply to flooding from all sources, including the consideration of climate change impacts in response to comments made by the Environment Agency;
- The wording of Part 1d has been amended to refer to 'safe access and escape route' in response to comments by Cambridgeshire County Council that it would then be in line with PPG.
- An additional paragraph clarifying approaches limiting the development of highly vulnerable uses at basement level and ground-floor-only level in Flood Zone 3 has been added (Part 2);
- Added a new section on the management of flood water to ensure proposals do not impede the storage of flood water or worsen flooding onset within or around the site, responding to comments by the

Environment Agency (Part 3 and Part 4);

- Clarified that Flood Risk Assessments must take into account the impacts of climate change (Part 6);
- Further guidance provided in the supporting text on how flood risk will be assessed, flood risk emergency planning, and measures that will be required to reflect the additional clarification requests made by consultees; and
- Minor alterations to the wording and structure of the policy and supporting text to improve clarity of expression, consistency with the wider Local Plan and to refer to National Planning Practice Guidance.

9. Proposed Submission Local Plan update to CC/RE: Renewable energy projects and infrastructure

Policy context update

9.1 No additional policy context update.

New or updated evidence

9.2 No additional evidence update.

Additional alternative approaches considered

9.3 No additional alternative approaches identified.

Proposed approach

9.4 The following amendments have been made to the Draft Plan policy:

- Point 1 and Point 3 of the policy has been amended in response to representations to include battery storage more explicitly and clarification on unacceptable impacts being those that cannot be mitigated and are reversible.
- In response to Natural England's representations, point 1b has been amended to include peat soil to ensure that renewables are not built on peat soils, to ensure these areas are preserved.
- To better set out how commercially-led renewable and low carbon schemes will be assessed, points 8 and 9 have been added to ensure that commercially led renewable energy schemes make provision for community benefits. The policy now sets out that this will be given positive weight in decision making, and subject to viability schemes over 10MW capacity should contribute a community benefits fund or create a community funded element. This has been included to support wider Council ambitions to deliver community energy projects.
- To reflect more up to date discussions and language around Heat Network Zoning, the Heat Network Zoning Study has been changed to Heat Network Priority Area and a link has been provided to the CCCHN

Future Proofing Guidance.

- In response to comments from Historic England, the supporting text in paragraph 4.46 has been revised to include a requirement for a Heritage Impact Assessment as well as a Landscape and Visual Assessment to mitigate the impact of renewable energy generation on heritage assets and existing buildings. The supporting text in paragraph 4.51 has also been revised to set out this requirement for an HIA in more detail.
- Paragraph 4.53 of the supporting text has been included to be more explicitly about community energy led proposals in response to wider Council ambitions to support community led energy proposals.
- Paragraphs 4.54 and 4.55 have been revised to reflect more up to date language in relation to District Heating. This includes renaming the Heat Network Zoning Study, the Heat Network Priority Area and making amendments for accuracy to align the Local Plan policy with wider Heat Network ambitions of the Council and national Heat Network zoning.
- A separate Sustainability Checklist for Renewable Energy has been prepared to set out what the submission requirements are for renewable energy applications. This has been appended to this topic paper in Appendix 1.

10. Proposed Submission Local Plan update to CC/CE: Supporting a circular economy and sustainable resource use

Policy context update

10.1 No additional policy context update.

New or updated evidence

10.2 An addendum to the Climate Change Topic Paper a Net Zero Evidence Addendum document has been prepared by officers and reviewed by Bioregional. The purpose of this Addendum is to provide implementation guidance to support the application of existing Policies CC/SD, CC/NZ and CC/CE, and the new policy Sustainable Retrofit. It considers how information submitted as part of a planning application should be presented, reported and, where a development cannot meet the standard, how this should be negotiated. This Addendum does not provide further policy justification, numerical targets, definitions of net zero carbon, or viability considerations, all of which are already comprehensively addressed through the Climate Change Topic Paper and the supporting net zero evidence base, which together sets out the justification for the climate policies in the emerging Greater Cambridge Local Plan – this Addendum should be read alongside those documents. Rather, the purpose of the Addendum is to provide clarity, consistency and certainty on how the proposed policies are applied, and how policy compliance would be evidenced, negotiated and secured through the planning process.

Additional alternative approaches considered

10.3 No additional alternative approaches identified.

Proposed approach

10.4 The following amendments have been made to the Draft Plan policy:

- Point 1 has been amended to include proportionate in response to comments about the potential for Circular Economy requirements to be too onerous. A minor amendment has been made for clarity of expression to point 1.
- Point 1d of the policy has been amended to set out demolition may be made acceptable through bespoke operational requirements which could not be provided through the repurposing, adaptation or extension of the existing building(s)'. This provides further clarity on the implementation of policy surrounding acceptability of demolition.
- Point 1e has been amended for clarity to set out that Sustainability Statements should be used for setting out the acceptability of demolition by applicants.
- Point 1f has been amended for clarity to be more specific on the requirements for a pre-demolition audit in response to representations.
- The Circular Economy Statement section has been moved ahead of the Operational Waste Management for clarity of expression in the policy wording.
- Point 7 has been added to the policy under Operational Waste Management to set out that '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. However, contaminated materials that are or must be disposed of are waste and must be managed in accordance with the relevant legislation'. This is to provide further information on how to manage waste effectively.
- Point 4.61 and 4.62 have been added to the supporting text in response to representations about implementation and definition of 'significant part' of

the building.

- Point 4.65 has been added to the supporting text in direct response to Cambridgeshire County Council's request to include reference to the Cambridgeshire and Peterborough Minerals and Waste Plan.
- Minor amendments have been made to the policy and supporting text arising from a review of clarity of expression.

11. Proposed Submission Local Plan update to CC/CS: Supporting land-based carbon sequestration and carbon sinks

Policy context update

11.1 No additional policy context update.

New or updated evidence

11.2 No additional evidence update.

Additional alternative approaches considered

11.3 No additional alternative approaches identified.

Proposed approach

11.4 The following amendments have been made to the Draft Plan policy:

- Part 2 of the policy has been amended to strengthen the protection of on-site peat soil, responding to comments by consultees including Natural England;
- Part 4 of the policy has been reworked to clarify the Councils expectations for works that involve the disturbance or removal of on-site peat soils, including the details expected as part of a Soil Management Plan and the experience and qualification of technical overseers;
- Part 4 of the policy now also makes a distinction between the treatment of peat soil and other soil and aggregates due to the special requirements for peat soil handling, responding to comments made by Natural England; and
- Minor alterations to the wording and grammar of the policy and supporting text to improve clarity of expression and consistency with the wider Local Plan.

12. Proposed Submission Local Plan update CC/SR: Sustainable retrofit

Policy context update

12.1 No additional policy context update.

New or updated evidence

12.2 An addendum to the Climate Change Topic Paper a Net Zero Evidence Addendum document has been prepared by officers and reviewed by Bioregional. The purpose of this Addendum is to provide implementation guidance to support the application of existing Policies CC/SD, CC/NZ and CC/CE, and the new policy Sustainable Retrofit. It considers how information submitted as part of a planning application should be presented, reported and, where a development cannot meet the standard, how this should be negotiated. This Addendum does not provide further policy justification, numerical targets, definitions of net zero carbon, or viability considerations, all of which are already comprehensively addressed through the Climate Change Topic Paper and the supporting net zero evidence base, which together sets out the justification for the climate policies in the emerging Greater Cambridge Local Plan – this Addendum should be read alongside those documents. Rather, the purpose of the Addendum is to provide clarity, consistency and certainty on how the proposed policies are applied, and how policy compliance would be evidenced, negotiated and secured through the planning process.

Additional alternative approaches considered

12.3 No additional alternative approaches identified.

Proposed approach

12.4 The Net Zero Buildings Policy is for new development only, and therefore there was not a policy to reduce energy demand and therefore carbon emissions in the refurbishment or retrofit of buildings. This policy has been introduced for the retrofit and refurbishment of buildings to ensure that all development for which planning permission is required is reducing operational carbon emissions. This policy is a criteria based policy utilising the energy hierarchy to reduce operational energy, and therefore operational carbon. To incentivise retrofit and refurbishment, there is no energy offset requirement for this type of development. This policy is for development that has retained a substantial amount of the building including the substructure, superstructure, and walls.

13. Appendix 1 – Climate Change Sustainability Checklist

The Sustainability checklists below provide the questions that applicants need to respond to in their Sustainability Statement and other relevant documents to demonstrate how they have complied with policies in the Greater Cambridge Local Plan. Two checklists have been produced, one for minor development and one for major development. On adoption of the Greater Cambridge Local Plan, these checklists will replace those contained in the 2020 Greater Cambridge Sustainable Design and Construction SPD. Wider guidance to support implementation of the Greater Cambridge Local Plan will also be developed in the form of technical notes, covering matters such as net zero carbon and technical guidance on how to meet the requirements of policy CC/NZ. It should be noted that the checklists provided below are in draft form and may be subject to further development and refinement as the Greater Cambridge Local Plan progresses towards adoption.

The table below outlines the policies and themes that the checklists cover from the climate change chapter of the Greater Cambridge Local Plan and provides information on submission requirements.

Theme	Policy	Applicable to Minor Development	Applicable to Major Development
Net zero carbon	Policy CC/NZ	Yes – Energy Statement	Yes – Energy Statement and Whole Life Carbon Assessment for some scales of development[1]
Climate resilience	Policy CC/DC	Yes – Sustainability Statement as part of Design and Access Statement	Yes – Sustainability Statement
Water efficiency	Policy CC/WE	Yes – Sustainability Statement	Yes – Sustainability Statement
Integrated water management and SuDS	Policy CC/IW	Yes – Sustainability Statement and Surface Water Drainage Strategy	Yes – Sustainability Statement and Surface Water Drainage Strategy

[1] See NZC5 of the major development checklist

Theme	Policy	Applicable to Minor Development	Applicable to Major Development
Wastewater	Policy CC/IW	Yes – Sustainability Statement	Yes – Utilities Statement
Flood risk	Policy CC/FM	Yes – Flood Risk Assessment where required	Yes – Flood Risk Assessment
Circular Economy	Policy CC/CE	Yes – Sustainability Statement	Yes – Sustainability Statement and/or Circular Economy Statement depending on scale[2]
Land based carbon sequestration	Policy CC/CS	To be confirmed	Yes – Sustainability Statement
Sustainable retrofit of existing buildings	Policy CC/SR	Yes – Sustainability Statement	Yes – Sustainability Statement

[2] See CE2 of the major development sustainability checklist

Sustainability Checklist - Minor Development

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
NZC1	Net Zero Carbon: Operational energy – residential development	CC/NZ	**Route to compliance option 1:** Provision of energy modelling using PHPP or another established "design-for performance" methodology demonstrating: • Space heating demand of 15-20 kWh/m^2/yr • Energy Use Intensity of no more than 35 kWh/m^2/yr • On-site renewable energy generation equal to or greater than the Energy Use Intensity **Route to compliance option 2:** Has the schemed complied with the standard specification (to be set out in a technical note taking a similar approach to that in the Central Lincolnshire Energy Efficient Design Guide)	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
NZC2	Net Zero Carbon: Operational energy non-residential development	CC/NZ	Provision of energy modelling using PHPP or another established "design-for performance" methodology demonstrating: • Space heating demand of between 15-20 kWh/m2/yr • Energy Use Intensity in line with policy target for building type On-site renewable energy generation equal to or greater than the Energy Use Intensity	
NZC3	Net Zero Carbon – Embodied Carbon	CC/NZ	Have you considered ways in which to minimise embodied carbon using the following steps[3]: 1. Build less: prioritise retaining, refurbishing and re-using existing buildings. Only consider new build where retrofit cannot meet performance, safety or functional requirements. 2. Build efficiently: use material efficient design, right-sized elements and optimise structural and facade systems	

[3] For further guidance see the UK Green Building Council Whole Life Carbon Framework

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
			to meet performance with less. 3. Design out waste: plan for disassembly and reuse, standardise components and specify methods that cut site-waste throughout the various stages of construction. 4. Specify low embodied carbon: select lower carbon products using robust data (for example Environmental Product Declarations).	
CR1	Climate resilience: Urban Heat Island (UHI)	CC/DC	How have you integrated the role of green infrastructure and cool materials into the design of your proposals (for example green roofs and enhancing tree canopy cover)?	
CR2	Climate resilience: UHI	CC/DC	Where there are existing trees on your site, including ancient and veteran trees, how has the retention of these trees informed the layout of the development. Where trees are to be lost, how are you replacing and enhancing tree canopy cover as part of your development proposals?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
CR3	Climate Resilience – overheating in buildings. All types of development	CC/DC	How have you followed the cooling hierarchy to mitigate the risk of overheating, giving priority to passive design measures and passive/natural ventilation? For example inclusion of horizontal external shading or overhangs for south facing elevations or vertical shading on west facing elevations and the role of cross ventilation.	
Wt1	Water efficiency (residential development of less than 100 dwellings)	CC/WE	Have you provided details of how the scheme will achieve a design standard of water usage of no more than 90 litres/person/day? If you are proposing any water reuse or recycling system have you provided details including relevant drawings showing the location of infrastructure and details of how it will be managed and maintained?	
Wt2	Water efficiency (non-residential development)	CC/WE	Have you provided a BREEAM Wat01 calculator or other water calculation demonstrating achievement of at least 4 Wat01 credits or an equivalent 60% reduction in baseline water use? If you are proposing any water	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
			reuse or recycling system have you provided details including relevant drawings showing the location of infrastructure and details of how it will be managed and maintained?	
Wt3	Water efficiency (non-residential development)	CC/WE	Have you provided information demonstrating how the scheme achieves full credits for Wat02 and Wat03 of BREEAM?	
Wt4	Water efficiency (non-residential development that use water as part of a commercial process(es))	CC/WE	Have you provided information demonstrating how the scheme achieves full credits for Wat04 and at least one credit for Wat05 of BREEAM?	
Wt5	Water efficiency – refurbishment of existing buildings	CC/WE	What measures have you implemented to enhance the water efficiency of your proposals, aiming to achieve at least 90 litres/person/day for residential proposals or following the BREEAM methodology for	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
			non-residential proposals? If you are proposing any water reuse or recycling system have you provided details including relevant drawings showing the location of infrastructure and details of how it will be managed and maintained?	
IWM1	Integrated Water Management	CC/IW	Have you provided evidence of a site-wide integrated water management approach? (for example use of permeable surfaces, use of SuDS, collection of rainwater and maximising any associated benefits for biodiversity, reduction of flood risk and managing water quality)	
IWM2	Sustainable drainage systems	CC/IW	Have you provided details about the SuDS scheme on the site including details of the future management, maintenance and adoption of the SuDS including who will be responsible?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
IWM3	Wastewater	CC/IM	Have you provided details that a connection to the wastewater network has been secured with Anglian Water?	
FM1	Flood risk management	CC/FM	To be confirmed – possible link to guidance from the Lead Local Flood Authority	
CE1	Circular Economy (all minor development involving demolition and new build)	CC/CE	Have you given consideration to the reuse and refurbishment/retrofit of the existing building and if this is not possible, explained the reasons why? Note that the reuse and retrofit of existing buildings should be prioritised unless it cannot meet performance, safety or functional requirements.	
CE2	Circular Economy (all types of development)	CC/CE	How have you integrated Circular Economy Principles into the design of the development, including: • The creation of buildings that are high quality, flexible and pay attention	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
			to building lifespan through appropriate construction methods and the use of attractive, robust materials that weather and mature well. • Design measures to reduce the demand for new materials • Reuse of any existing materials arising from the development (e.g. from demolition) • The specification of materials and construction methods to enable the reuse of materials (e.g. use of mechanical fixings over chemical fixings) known as design for deconstruction • How construction waste will be minimised	
CE3	Circular economy – operational waste	CC/CE	Has the size and location of recycling and waste facilities, both for storage and collection, been factored into the design of the proposals using the requirements set out in the RECAP Waste Management	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
			Design Guide? Have you completed the Shared Waste Services Developers Minimum Standards Checklist?	
SR1	Retrofit of existing buildings (all proposals for retrofit of existing buildings requiring planning permission)	CC/SR	Have you set out how your approach follows the energy hierarchy of: 1. Be lean: improving the fabric efficiency of the building. 2. Be clean: implementing energy efficiency measures to use energy more efficiently. 3. Be green: implementing low and zero carbon heat sources and other sources of renewable energy	
SR2	Retrofit of existing buildings (all proposals for retrofit of existing buildings requiring	CC/SR	Where improvements to fabric efficiency and air tightness have been proposed, what measures have been implemented to ensure sufficient ventilation is provided?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
	planning permission)			
SR3	Retrofit of existing buildings (all proposals for retrofit of existing buildings requiring planning permission)	CC/SR	Have you integrated any measures to enhance the climate resilience of your building? For example, the addition of external shading on exposed elevations or the reinstatement/refurbishment of existing external shading such as shutters or box blinds?	

Sustainability Checklist - Major Development

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
NZC1	Net Zero Carbon: Operational energy residential development	CC/NZ	Provision of energy modelling using PHPP or another established "design-for performance" methodology demonstrating: • Space heating demand of 15-20 kWh/m^2/yr • Energy Use Intensity of no more than 35 kWh/m^2/yr • On-site renewable energy generation equal to or greater than the Energy Use Intensity	
NZC2	Net Zero Carbon: Operational energy non-residential development[4]	CC/NZ	Provision of energy modelling using PHPP or another established "design-for performance" methodology demonstrating: • Space heating demand of between 15-20 kWh/m^2/yr • Energy Use Intensity in line with policy target for building type	

[4] in exceptional circumstances, alternative approaches to policy compliance will be negotiated on a site by site basis where the applicant can demonstrate it is unachievable due to constraints from land use / energy demand

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			• On-site renewable energy generation equal to or greater than the Energy Use Intensity	
NZC3	Net Zero Carbon: Operational energy residential and non-residential development	CC/NZ	In meeting the targets set out in policy CC/NZ how has the development followed the design principles of: 1. Orientation of buildings 2. Form of buildings 3. Fabric of buildings 4. Heat supply 5. Renewable energy generation	
NZC4	Net Zero Carbon: embodied carbon (all scales of major development)	CC/NZ	Have you considered ways in which to minimise embodied carbon using the following steps[5]: 1. Build less: prioritise retaining, refurbishing and re-using existing buildings. Only consider new build where retrofit cannot meet performance, safety or functional requirements. 2. Build efficiently: use material efficient design, right-sized elements and optimise	

[5] For further guidance see the UK Green Building Council Whole Life Carbon Framework

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			structural and facade systems to meet performance with less. 3. Design out waste: plan for disassembly and reuse, standardise components and specify methods that cut site-waste throughout the various stages of construction. 4. Specify low embodied carbon: select lower carbon products using robust data (for example Environmental Product Declarations) and for applicable scales of development (see NZC5 below) disclose results thought Whole Life Carbon Assessment (WLCA) in line with RICS WLCA.	
NZC5	Net Zero Carbon: embodied carbon (residential development of over 100 homes and non-residential	CC/NZ	Have you carried out and submitted a Whole Life Carbon Assessment and what actions have been taken to reduce up-front carbon emissions?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
	development of 10,000 sqm or more)			
CR1	Climate Resilience: Urban Heat Island (UHI) (all types of development)	CC/DC	How have you integrated the role of green and blue infrastructure and cool materials into the design of your proposals?	
CR2	Climate resilience: Urban Greening Factor (all types of development)	BG/UGF	Have you submitted Natural England's Urban Greening Factor Spreadsheet demonstrating how your development will achieve an Urban Greening Factor score of at least: • 0.3 for predominantly commercial development. • 0.4 for predominantly residential development within Cambridge Defined Development Extent. • 0.5 for predominantly residential development outside the Cambridge Defined Development Extent (except where it can be demonstrated that more than 50% of the site	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			area equates to accessible green space). Has the green infrastructure secured by the Urban Green Factor been secured in a Green Infrastructure Operation and Maintenance Plan?	
CR3	Climate resilience: UHI (all types of development)	CC/DC	Where there are existing trees on your site, including ancient and veteran trees, how has the retention of these trees informed the layout of the development. Where trees are to be lost, how are you replacing and enhancing tree canopy cover as part of your development proposals?	
CR4	Climate resilience: overheating in buildings (all types of development)	CC/DC	Have you integrated passive design measures to design out the risk of overheating in line with the cooling hierarchy. For example, inclusion of horizontal external shading or overhangs for south facing elevations or vertical shading on west facing elevations.	
CR5	Climate resilience: overheating in buildings (all	CC/DC	Has the design of the proposals been informed by overheating assessment (either early stage Part O assessment or, for non-	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
	types of development)		residential development TM52) using the most up to date CIBSE weather files for Cambridge and stress tested against future climate scenarios (at least 2050)? How has this assessment influenced the design of proposals including elements such as glazing ratios and glazing specifications?	
CR6	Climate resilience: overheating in buildings – residential development (apartments)	CC/DC	Are all apartments capable of cross ventilation? Where this is not possible, what is the external shading strategy to minimise internal solar gains alongside the wider role of the cooling hierarchy?	
CR7	Climate resilience: overheating in buildings (all residential development, notably apartments)	CC/DC	If floor to ceiling glazing is proposed how has external shading been integrated into its design and has a secure means of providing unrestricted natural ventilation been provided?	
CR8	Climate resilience: overheating in buildings (all types of	CC/DC	Where heat is to be managed within the building through exposed thermal mass, how has provision been made for secure nighttime ventilation?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
	development)			
CR9	Climate resilience: overheating in buildings (all types of development)	CC/DC	Having prioritised passive design measures, how have M&E systems been futureproofed for our changing climate?	
Wt1	Water efficiency: new residential development of 100 or more dwellings	CC/WE	Have you provided details of how the scheme will achieve a design standard of water usage of no more than 80 litres/person/day? If you are proposing any water reuse or recycling system have you provided details including relevant drawings showing the location of infrastructure and details of how it will be managed and maintained?	
Wt2	Water efficiency: new residential development of less than 100 dwellings	CC/WE	Have you provided details of how the scheme will achieve a design standard of water usage of no more than 90 litres/person/day? If you are proposing any water reuse or recycling system have you provided details including relevant drawings showing the	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			location of infrastructure and details of how it will be managed and maintained?	
Wt3	Water efficiency: new non-residential development	CC/WE	Have you provided a BREEAM Wat01 calculator or other water calculation demonstrating achievement of at least 4 Wat01 credits or an equivalent 60% reduction in baseline water use? If you are proposing any water reuse or recycling system have you provided details including relevant drawings showing the location of infrastructure and details of how it will be managed and maintained?	
Wt4	Water efficiency: new non-residential development	CC/WE	Have you provided information demonstrating how the scheme achieves full credits for Wat02 and Wat03 of BREEAM?	
Wt5	Water efficiency: new non-residential development which uses water for commercial processes	CC/WE	Have you provided information demonstrating how the scheme achieves full credits for Wat04 and at least one credit for Wat05 of BREEAM to reduce potable water used for commercial processes?	
Wt6	Water	CC/WE	How are you avoiding the need	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
	efficiency: data centres		for potable water to be used for cooling, through the use of closed-loop cooling systems and/or the reuse of rainwater or greywater?	
Wt7	Water efficiency: major refurbishment and change of use	CC/WE	What measures have you implemented to enhance the water efficiency of your proposals, aiming to achieve at least 90 litres/person/day for residential proposals or following the BREEAM methodology for non-residential proposals?	
IWM1	Integrated Water Management	CC/IW	Have you provided evidence of a site-wide integrated water management approach? Have you considered water efficiency, sustainable drainage, water quality, flood risk and biodiversity in the design of the development and the use of nature-based solutions and natural flood management techniques wherever practicable?	
IWM2	Sustainable drainage systems	CC/IW	Have you provided details about the SuDS scheme on the site including details of the future management, maintenance and adoption of the SuDS including who will be responsible?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
IWM3	Wastewater	CC/IW	For major developments, have you confirmed with Anglian Water that there is capacity for wastewater treatment at a receiving Water Recycling Centre, and capacity in the wastewater conveyancing infrastructure or that extra capacity will be provided in time to serve the new development prior to first occupation? This detail should be provided in a Utilities Statement.	
FM1	Flood risk management	CC/FM	To be confirmed – possible link to guidance from the Lead Local Flood Authority	
CE1	Circular Economy (all types of development)	CC/CE	How have you incorporated Circular Economy Principles into the design of your development? Are there existing buildings on the site? Has their reuse and refurbishment been considered to prevent any unnecessary demolition (see also CE3 below)? Have you designed for long-term use, recoverability, longevity, adaptability and flexibility?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			Have you incorporated construction methods that allow for deconstruction at the end of the buildings life?	
CE2	Circular Economy (residential development of 150 or more dwellings, non-residential development of 15,000m^2 or more, major development with demolition of 500 m^2 or 5 homes or more)	CC/CE	Have you submitted a standalone Circular Economy Statement?	
CE3	Circular Economy: (development involving demolition of an existing building)	CC/CE	Where demolition is proposed, have you provided the following information to justify the need for demolition: 1. Evidence that the building proposed for demolition is in a state of such disrepair that it is not practical or viable to be repaired, refurbished or re-used (for reasons other than	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			deliberate damage or neglect); or 2. Repairing, refurbishing or re-using the building would likely result in similar or higher levels of newly generated up-front embodied carbon compared to demolition and re-construction; or 3. Repairing, refurbishing or reusing the building would create a building with such poor thermal efficiency that, when considering lifecycle embodied carbon, a lower net-carbon solution would arise from demolition and re-construction; or 4. Demolition of the building and construction of a new building would, or an exceptional basis, deliver other significant benefits that outweigh the carbon savings that would arise from the building being repaired o re-used. This may include bespoke	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			operational requirements that could not be provided through the repurposing, adaptation or extension of the existing building.	
CE4	Circular Economy (proposals involving demolition exceeding 500m^2 or more of floorspace)	CC/CE	Has a Pre-Demolition Audit been undertaken to quantify the materials within the structure to be demolished, and what steps have been taken to reuse or repurpose those materials as part of this development, or make them available for wider reuse?	
CE5	Circular Economy (proposals involving demolition below 500m^2 of floorspace)	CC/CE	What steps have been taken to quantify and identify materials within the structure to be demolished and to identify those that could be reused or repurposed as part of this development or made available for wider reuse?	
CE6	Circular Economy: Operational Waste Management (all types of development)	CC/CE	Has the size and location of recycling and waste facilities, both for storage and collection, been factored into the design of the proposals using the requirements set out in the RECAP Waste Management Design Guide?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			Have you completed the Shared Waste Services Developers Minimum Standards Checklist?	
CE7	Circular Economy: Operational Waste Management (high density residential development)	CC/CE	Has consideration been given to alternative waste management solutions such as underground bins in consultation with the Greater Cambridge Shared Waste Service?	
CS1	Carbon sequestration – development on peat soils[6]	CC/CS	If the development is in an area of peat soils: **Step 1:** Consider the location of your scheme: Why does the development have to go where it is proposed? What alternative options have you considered? Why have you discounted these alternative locations? **Step 2:** Consider the scale of	

[6] To access the England Peat Map Portal see: England Peat Map (EPM) Portal

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			your scheme: How can you reduce the amount/volume of peat that is to be developed? Please provide details. If you cannot reduce the volume, please say why. How can you change the layout of development to reduce the amount of peat soils affected? Please provide details. If you cannot change the layout, please say why. How can you reduce the scale of the development to reduce the amount of peat soils affected? Please provide details. If you cannot reduce the scale, please say why. If amending the layout/scale of the site is not feasible, practical or viable and you still intend to develop on peat soils, you need to provide robust justification for doing so. What volume of peat (m^3) will be	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			excavated? **Step 3:** Where development on peat soils can be justified: For peat soils to be kept on-site, where do you intend to dispose of the excavated peat soils? Please show on a plan with anticipated volume of each receiving area. How will these areas ensure the peat is kept wet? When will the receiving areas be ready to receive peat soils? What is the time-period between excavation and back-filling/depositing? Have you arranged for the peat to be covered with tarpaulin for this period? For peat soils to be disposed of elsewhere, have you contacted neighbouring landowners or operational teams in the Environment Agency or Wildlife Trust to check what local	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			opportunities may exist for receiving peat and keeping it wet? Have you contacted other organisations to see if they are willing and able to receive and use the excavated pear (e.g. farmers, local allotment societies)? Have you discussed your approach to dealing with the excavated peat with your contractor? Have they confirmed the approach is feasible? Have you looked into the need for an Environmental Permit for moving the excavated peat soils? What is the contingency plan for any peat left over and reducing the amount of peat excavated in the first place, using the peat onsite so it keep wet, using the peat locally so it keeps wet and re-use of the peat? How do your plans for disposing of peat affect flood risk? What	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			calculations and mitigation, if needed, have you produced?	
CS2	Carbon sequestration (soils)	CC/CS	Have you provided details about how soils will be appropriately stored and used in a way that would limit carbon emissions into the atmosphere as far as possible? Have you followed the DEFRA Code of Practice for the Sustainable Use of Soils on Construction Sites (2009) or successor documents?	
CS3	Carbon sequestration	CC/CS	Where your proposals include new open space and landscaped areas, what measures have you taken to enhance the capacity of those spaces to store carbon?	
SR1	Retrofit of existing buildings (all proposals for retrofit of existing buildings requiring planning permission)	CC/SR	Have you set out how your approach follows the energy hierarchy of: 1. Be lean: improving the fabric efficiency of the building. 2. Be clean: implementing energy efficiency measures to use energy more efficiently. Be green: implementing low and zero carbon heat sources and	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			other sources of renewable energy	
SR2	Retrofit of existing buildings (all proposals for retrofit of existing buildings requiring planning permission)	CC/SR	Where improvements to fabric efficiency and air tightness have been proposed, what measures have been implemented to ensure sufficient ventilation is provided?	
SR3	Retrofit of existing buildings (all proposals for retrofit of existing buildings requiring planning permission)	CC/SR	Have you integrated any measures to enhance the climate resilience of your building? For example, the addition of external shading on exposed elevations or the reinstatement/refurbishment of existing external shading such as shutters or box blinds?	