

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)

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 Local 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

23 Appendix 1 Sustainability Checklist and Appendix 2 Net Zero Carbon Addendum have been included as appendices to the Climate Change Topic Paper.

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.

¹ Please note: The 12-month transitional arrangements also mean that if a development's plans were submitted to the Council by the 23 March 2027, and work commenced on site by 23 March 2028, then the FHS would not be mandatory and the legal minimum standards for that building would be current (Part L 2021) not the FHS. Adding on a further typical 1-year construction period, this means that non-FHS homes could still be getting completed as late as March 2029 (or even later if construction takes longer than 1 year).

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 floor area	Circa 40% of ground floor area; but this will vary (and none if there is any storey of 18 metres or taller).	Sufficient solar to meet 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/m²/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)

² See technical modelling specifications in [Greater Cambridge Local Plan: Net Zero Carbon Evidence Base](#)

³ See technical modelling specifications in [Greater Cambridge Local Plan: Net Zero Carbon Evidence Base](#)

⁴ See technical modelling specifications in [Greater Cambridge Local Plan: Net Zero Carbon Evidence Base](#)

⁵ Space heat demand figures calculated using SAP dramatically underestimate what the actual space heat demand will be. Actual space heat demand is estimated to be 210-560% higher than the SAP figure. Reference: [Cornwall climate emergency DPD technical evidence base](#)

⁶ [The Isle of Wight guide to deliver net zero carbon homes](#)

⁷ [Cornwall climate emergency DPD technical evidence base](#)

⁸ [Cornwall climate emergency DPD technical evidence base technical appendices](#)

⁹ [South Oxfordshire and Vale of White Horse joint local plan: net zero carbon study](#)

¹⁰ Identified in PHPP modelling for other councils in the South of England that is not yet published.

- 5.3 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 (For example, where necessary to fully meet the local plan's legal duty to mitigate climate change, imposed by the Planning & Compulsory Purchase Act 2004 section 19) 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)

- 5.4 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)

5.5 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

5.6 No additional alternative approaches identified.

Proposed approach

5.7 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 5,000 square metres 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 within 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 2 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 2: 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 community-led, commercially-led renewable and low carbon schemes will be assessed, two additional paragraphs 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 2d 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 3 has been amended to set out the requirements for the justification of demolition including requirements for a Pre-Demolition Audit.
- Point 4c has been revised to set out that Circular Economy Statements are required for – Major development proposals that involve substantial demolition of 500 square metres or 5 homes or more.
- Point 5 has been amended for clarity to set out that Sustainability Statements should be used for setting out the acceptability of demolition by applicants.
- 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 policy: leave to Building Regulations. This option has not been appraised as it was not considered a reasonable alternative because the application of Building Regulations to works to existing homes and buildings to address net zero carbon is limited and would not fulfil the legal duty on local authorities to include policies related to both climate change adaptation and mitigation, as contained within the Planning Act.

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 (See NZC5 of the major development checklist)
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

Theme	Policy	Applicable to Minor Development	Applicable to Major Development
Integrated water management and SuDS	Policy CC/IW	Yes – Sustainability Statement and Surface Water Drainage Strategy	Yes – Sustainability Statement and Surface Water Drainage Strategy
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 (See CE2 of the major development sustainability checklist)
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

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/m²/yr • Energy Use Intensity of no more than 35 kWh/m²/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: 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	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
			elements and optimise 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).	
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)?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
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?	
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	

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?	
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 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?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
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 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?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
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?	
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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
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 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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
			• 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 Design Guide? Have you completed the Shared Waste Services Developers Minimum Standards Checklist?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
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 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?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence/detail
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/m²/yr • Energy Use Intensity of no more than 35 kWh/m²/yr • On-site renewable energy generation equal to or greater than the Energy Use Intensity	
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	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: 1. Build less: prioritise retaining, refurbishing and re-using existing buildings. Only consider new build where retrofit cannot meet performance, safety or functional requirements.	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
			2. Build efficiently: use material efficient design, right-sized elements and optimise 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.	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
NZC5	Net Zero Carbon: embodied carbon (residential development of over 100 homes and non-residential development of 10,000 square metres or more)	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?	
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	BG/UGF	Have you submitted Natural England's Urban Greening Factor Spreadsheet demonstrating how your development will achieve an	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
	types of development)		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 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?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
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 types of development)	CC/DC	Has the design of the proposals been informed by overheating assessment (either early stage Part O assessment or, for non-residential development TM52) using the most up to date CIBSE weather files for Cambridge and	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			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?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
CR8	Climate resilience: overheating in buildings (all types of development)	CC/DC	Where heat is to be managed within the building through exposed thermal mass, how has provision been made for secure nighttime ventilation?	
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?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
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 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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			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 efficiency: data centres	CC/WE	How are you avoiding the need 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	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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
	use		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?	
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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			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 15,000 square metres or more, major development with demolition of 500 square metres or 5 homes or more)	CC/CE	Have you submitted a standalone Circular Economy Statement?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
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 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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			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 or re-used. This may include bespoke operational requirements that could not be provided through the repurposing, adaptation or extension of the existing building.	
CE4	Circular Economy (proposals involving demolition exceeding 500	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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
	square metres or more of floorspace)		part of this development, or make them available for wider reuse?	
CE5	Circular Economy (proposals involving demolition below 500 square metres 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? Have you completed the Shared Waste Services Developers Minimum Standards Checklist?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
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	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 your scheme:	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
			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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			doing so. What volume of peat (m³) will be 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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			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 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 peat (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	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
			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 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?	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
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 other sources of renewable energy	

Code	Theme	Policy	Requirements	Response/Summary of approach and location of further evidence
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?	

Appendix 2 - Greater Cambridge Local Plan – Addendum to Topic Paper

Prepared by GCSP with Bioregional Peer Review

Introduction

1. It is the view of the Councils that the approach and methodology to assess and deliver net-zero-carbon new-build development should proceed with the use of energy use intensity targets and space heating demand attributed to specific typologies and the use of energy offsetting (with preference for this to be done via on-site renewable energy) to deliver a net zero carbon balance.
2. This approach recognises the need to close the performance gap and model much more accurately the energy demand of a building, including both regulated and unregulated energy. This approach also recognises the nuances between different residential and non-residential typologies in the amount of and types of energy use and its prediction, hence the need for more specific targets, as set out in the new Local Plan policy, and more nuanced back-up positions. This Addendum demonstrates how these policies will be applied in more detail to recognise these nuances and set out how the policies could be applied in different scenarios. This addendum focuses primarily on operational energy demand; however, upfront embodied carbon reduction and assessment and the monitoring of whole-lifecycle carbon is similarly in need of further detail to demonstrate how, in more unique circumstances, the policies will be expected to be applied. This will be set out in the Sustainability Checklist.
3. 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.

4. This Addendum addresses each policy in turn and identifies key considerations for implementation and where alternative options may be required. Under each policy, the addendum will set out the key considerations for the implementation of the policy, including back-up policy options, and then set out a recommendation for the implementation of the policy, focusing on areas that have been identified as needing further justification and rationale through consultation and reflecting on wider context of delivering net zero carbon development. This addendum adds guidance to the existing proposed policies to set out the procedures and process for implementing proposed policy.

Policy CC/SD: Sustainable development and the climate emergency

5. The purpose of a sustainability statement is to function as a catch-all document for all sustainability related information relevant to a planning application, which may include energy efficiency, embodied carbon, renewable energy, sustainable transport, waste management, carbon capture and sequestration, water use and management, flood risk, design-led climate adaptations, and multi-functional habitat creation and management.
6. Sustainability statements can be flexibly applied to different uses. The content of a sustainability statement should be proportionate to the scale of development, and can be flexibly applied to different uses.
7. The Sustainability Checklist will set out the questions that applicants need to respond to within their Sustainability Statement (and other relevant application documents) to demonstrate how the various policy requirements from the climate change and other relevant chapters of the Greater Cambridge Local Plan have been met as part of development proposals. It will cover the following topic areas and policy requirements:
 - Policy CC/NZ – how the policy meets the requirements related to net zero carbon operational emissions and embodied carbon reporting in new-build development.
 - Policy CC/WE – water efficiency in new developments
 - Policy CC/IW – integrated water management, sustainable drainage and water quality (with reference to more detailed documents such as surface water drainage strategies)
 - Policy CC/FM – managing flood risk (with reference to more detailed information contained within a Flood Risk Assessment)
 - Policy CC/CE – circular economy and sustainable resource use (with reference to more detailed information contained within a standalone Circular Economy Statement)

- Policy CC/CS – supporting land-based carbon sequestration and carbon sinks
 - Policy GP/PP – people and place responsive design
 - Policy I/ST – sustainable transport and connectivity
 - Policy I/EV – parking and electric vehicles
8. In order to ensure that the requirements are proportionate to the scale of development proposed, two checklists will be developed to help provide the structure for the Sustainability Statement: one for major development applications and one for minor development applications. Where appropriate, the checklist may also differentiate between the level of detail expected from outline applications versus full or reserved matters applications. This will help ensure that the information requested is proportionate to the nature and scale of the development. In many cases, the requirements set out in the Greater Cambridge Local Plan will relate to both residential and non-residential development, but the checklists will clarify the relevancy of a particular requirement to different types of development.
9. Where projects are utilising the Councils' pre-application or planning performance agreement (PPA) services, the Checklist will be provided to applicants after the first pre-application meeting in order that the requirements can be integrated into the design of the proposals from the earliest possible stage. It should be submitted alongside the Sustainability Statement as part of the planning submission. Applications are unlikely to be validated if these documents have not been submitted.
10. The Sustainability Statement should take the form of a report with accompanying plans and drawings to illustrate and elaborate on and evidence how the requirements set out in the Checklists have been satisfied. Applicants are advised to:
- Structure the Sustainability Statement in the same order and with the same theme headings as the Checklist;
 - Be succinct when describing the nature of technologies or measures being proposed, providing a summary of proposals and cross referencing with any information contained in other more detailed technical reports where appropriate;
 - Concentrate on demonstrating and quantifying what impact implementing the proposed measures is likely to have on the overall impact of the development, compared to basic regulatory compliance; and
 - Reference how measures have been integrated into the overall design of the development.

11. Where appropriate, conditions will be used to secure the implementation of measures and targets set out within the Sustainability Statement. This could include conditions related to:
- Net zero carbon operational emissions
 - Water efficiency
 - Post Occupancy Evaluation
 - Submission of Circular Economy Statements for reserved matters applications meeting the threshold for these statements.
12. Further guidance on the implementation of specific policies will be provided in technical guidance notes where required. This may include the development of templates and proformas where this is necessary to help to simplify submission requirements for applicants. There are no specific post-completion requirements relating to securing a sustainability statement specifically.

Policy CC/NZ: Net zero carbon new buildings

13. The application of the net zero carbon new buildings policy implements targets based on energy demand and not carbon. The modelling undertaken to support Policy CC/NZ demonstrates that the energy metrics are achievable for the majority of development types. For non-residential development, targets have been informed by the [UK Net Zero Carbon Buildings Standard \(UKNZCBS\)](#), which are underpinned by significant technical modelling and have been applied to a range of real-world pilot projects. There may be some exceptional circumstances in which full policy compliance may not be possible and these will need to be discussed early as part of pre-application discussions to agree a suitable fallback position.

Parts A – C of policy CC/NZ:

14. In order to demonstrate that developments meet the energy metrics included within Policy CC/NZ, applicants will need to submit an Energy Statement (which can form part of the Sustainability Statement) with energy calculations undertaken using a methodology capable of providing accurate predictions of total in-use energy (e.g. CIBSE TM54 or the Passivhaus Planning Package (PHPP)). For major developments submitting full or reserved matters applications, there will be an expectation that this will be supplied as part of planning applications, with implementation of the energy strategy being secured by planning conditions. For minor developments and major outline planning applications, where full calculations are not yet available, submission of further detail will be secured via planning conditions, albeit applications will need to provide an overview of the approach being taken to meet the required

targets set out within the policy. For minor developments, may find it an excessive burden to commission PHPP or TM54 studies, consideration is being given to developing a SAP compliance route akin to that used in Central Lincolnshire, which provides standard specifications for fabric, heating supply and renewable energy provision as a route to policy compliance. As a further alternative for minor developments, an excel-based tool could be developed to convert SAP inputs to reasonably realistic energy performance¹ metrics. Such a tool² is used by Cornwall Council and Bath & North-East Somerset Councils in the implementation of their 2023 local plan policies, which use the same energy performance metrics as the proposed Greater Cambridge Policy CC/NZ.

15. In some cases, schemes being delivered to specific standards will be deemed to comply with elements of the policy. Table 2 below sets out which specific standards will be deemed as providing compliance and the submission requirements. Additional standards may be considered as providing a route to compliance where these deliver performance in line with the metrics contained within Policy CC/NZ. This should be discussed with officers as part of pre-application discussions.

16. Table 2: Other standards deemed to comply with elements of policy CC/NZ (note this can apply to all scales of development).

Scheme/Standard	Limitations	Requirement(s) satisfied	Submission requirements
NABERS UK	Building type: All Sectors: Office	Part B: Total Energy Use Intensity	Energy Strategy to be submitted using calculation methodology approved for use in NABERS (is this TM54). Planning condition used to secure

¹ See “Energy summary tool SAP V2” at: <https://www.cornwall.gov.uk/planning-and-building-control/planning-policy/adopted-plans/planning-policy-guidance/#:~:text=CEDPD%20Policy%20SEC1%20%E2%80%93%20Energy%20Summary%20Tool%20SAP%20v2> . The tool was developed by Etude, who also provided the energy modelling evidence for Greater Cambridge’s proposed policy CC/NZ. Please note that although the tool is freely available from Cornwall Council, that exact tool is only tested for the South-West climate, thus may need revisions before it could give valid outputs in the Greater Cambridge context: <https://etude.co.uk/how-we-work/sap-conversion-tool/>

			submission of certification
Passivhaus (depending on level of Passivhaus certification)	Building type: All Sectors: Those covered under Passivhaus	Part A: Space heating demand (any level of Passivhaus certification) Part B: Total Energy Use Intensity (Passivhaus Plus and Premium only) Part C: On-site renewable energy generation: 2 storeys or lower: Passivhaus Plus or Premium only. 2.5 to 5.5 storeys: Passivhaus Premium only. Over 5 storeys: Policy 100% renewable energy target is not guaranteed by any level of Passivhaus certification.	Energy Strategy to be submitted with calculations generated in PHPP. Planning condition used to secure submission of certification
UK Net Zero Carbon Buildings Standard (UKNZCBS)*	Building Type: Homes and non-residential Sectors: Those covered under the UKNZCBS targets.	Part A: Space heating demand for homes only* Part B: Total Energy Use Intensity (for non-residential uses only)** Part C: On-site renewable energy	Energy Strategy to be submitted using calculation methodology approved for us by UKNZCBS. Planning condition used to secure

		generation for homes only	submission of verification***
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* At present the UKNZCBS does not set a space heating demand for non-residential buildings. This may change in future versions and if this matches the space heating demand referenced in policy CC/NZ, this can then be used for deemed compliance.

**To note, at present the UKNZCBS EUI limit for new-build homes is 50kWh/m²/year in 2026, which exceeds the requirement for homes in Policy CC/NZ. This limit tightens gradually based on which year construction was commenced, through to 2050. The limit in 2050 is 40kWh/m²/year for “single family home” or 44 for flats.

*** UKNZBCS only gives full verification based on at least 1 year of energy use data. This may be impractical to secure through condition. However, UKNZCBS also offers a “post-completion on-track” verification consisting of a set of checks showing that a completed building is capable of performing to the relevant UKNZCBS targets. This “post-completion on-track” verification would be the subject of the planning condition where UKNZCBS is used as the route to policy compliance.

Fallback position for inability to meet policy requirements

17. The development would need to demonstrate the above to be policy compliant and demonstrate progress against these standards. Where an applicant cannot demonstrate that a development would meet the specified standard in Policy CC/NZ, there are a number of options for a fallback position. These should only be used in exceptional circumstances.

18. The priority should be meeting the Space Heating Demand (SHD) first and then assess the ability to meet Energy Use Intensity (EUI) targets. This follows the priority to reduce energy demand overall first through fabric efficiency measures and reducing overall energy load, before looking to renewable energy generation to deliver net zero carbon balance onsite as a priority to reduce both regulated and unregulated energy to zero. Then, as a last resort, energy offset through renewable delivery should be used to achieve a net zero balance with onsite and offsite renewables. In exceptional circumstances where it is not possible to predict the unregulated energy² or where the proposed development’s unavoidable unique characteristics mean that its unregulated energy use is unavoidably too high³ to meet with renewable energy on site, achievement of a net zero balance using only regulated energy where it is not possible to predict the unregulated energy⁴ or

² For example, where generic retail is proposed and it cannot be known what type of retail business will take the space, given that energy use will be dramatically higher if there is extensive refrigeration.

³ For example, if a research and development laboratory or specialist medical facility might need to include specialist technologies whose energy use cannot be minimised to a point that would comply with the policy.

where the proposed development's unavoidable unique characteristics mean that its unregulated energy use is unavoidably too high⁵ to meet with renewable energy on site. This prioritisation of fallback positions aims to focus on achieving a net zero energy balance to reduce energy and carbon emissions to zero.

19. The order of preference for the fallback alternatives are set out below:

- The optimal scenarios the policy seeks to achieve across all typologies, once the space heating demand target has been met, is for the:
- EUI to be met and onsite net zero balance achieved without the need for any offsetting.
- EUI to be met, with any shortfall in renewable energy generation onsite to be addressed via energy offsetting to achieve a net zero carbon balance across onsite and offsite renewables.

20. Where this is not achievable due to unavoidably high energy demand of the specific use (which could prevent both the EUI target and the net zero balance) or due to site constraints (which could inhibit renewable energy production and therefore the net zero balance), the fallback positions would be to:

- Negotiate and agree an appropriate EUI for regulated energy uses only (likely within 30kwh/m²/y and to then incorporate renewable energy generation onsite to achieve a net zero balance onsite for total energy use. The applicant in this scenario would need to demonstrate that they have exhausted all feasible options to reduce energy use.
- Negotiate and agree an appropriate EUI for regulated energy uses only (likely within 30kwh/m²/y and to then generate a proportion of energy onsite and the remainder to be offsite using an energy offset to achieve a net zero balance for total energy use. The applicant in this scenario would need to demonstrate that they have exhausted all feasible and viable options to reduce energy use and maximise solar PV renewable energy generation onsite (with a guideline minimum generation benchmark of 75kWh/m² ⁶footprint/year⁶).
- Negotiate and agree an appropriate for regulated energy uses only EUI (likely within 30kwh/m²/y and aim to achieve a net zero balance on and offsite, but if the full offset payment would make the development unviable due to unavoidably high energy demand which cannot be met with a viable energy offset contribution, then an appropriate renewable energy generation target would be agreed to generate renewable

⁶ This target of 75kWh/m²footprint/year is taken from UKNZCBS for this region. This is in fact far less than most buildings are capable of producing using solar panels on their own roofs, representing an unshaded solar panel area equal to only about 37% of a flat roof area, or an even lower proportion of roof area if the roof is pitched.

energy on and offsite to meet this agreed renewable energy generation target. The aforementioned benchmark of 75kWh/m² building footprint/year shall be used as a guideline minimum for the on-site generation.

21. As a last resort, to only be used only where unregulated energy cannot be calculated (e.g. the fit out of the building is not being considered at this stage or the unregulated energy demand cannot accurately be modelled and predicted) or where the unregulated energy of the specific use is unavoidably high due to rare or unique characteristics of the specific proposed development,, then the EUI would only be for regulated energy uses. The applicant would then use a combination of on and offsite renewables and an offset mechanism to achieve a net zero balance against just that regulated energy.
22. Further guidance on the approach to the fallback positions will be provided in a technical note on the implementation of Policy CC/NZ.

Energy Offset Mechanism

23. Part D of Policy CC/NZ introduces the concept of an energy offset mechanism for those situations where economic viability or technical constraints prevent full on-site achievement of Part C of the policy, which seeks onsite renewable energy generation to equal, where possible, the total operational energy demand of a development. This offset mechanism would be used to invest in additional renewable energy generation to ensure that the development's net zero operational energy balance is still delivered.
24. It is the intention that this offsetting mechanism will only be used in exceptional circumstances, as the [technical modelling](#) undertaken by Etude to inform the metrics used in Policy CC/NZ shows that the requirement in Part C can be met onsite for the typologies modelled when the EUI limits have been met⁷ the requirements for onsite renewable energy generation². In these cases, the following approach will need to be taken:
- The priority should be meeting the space heating and EUI requirements of the policy and ensuring that all developments are fossil-fuel free;

⁷ For example, this could be the case where:

- The building is taller than those modelled, having a smaller ratio of roof space to floor area.
- The building is overshadowed by trees or existing buildings that are not being removed.
- The area of rooftop PV is limited because a large area of the roof has to be used for purposes in order for the building to function (e.g. rooftop ventilation plant) or meet other unavoidable requirements (e.g. biodiversity net gain or any other policy requirements for outdoor amenity)
- The building's energy use is unavoidably too high to be fully matched by onsite PV (as above)

- Then, calculate the renewable energy requirements to meet all of the energy demands of the development and then delivering as much of this as possible onsite, aiming for all energy demand to be met onsite with renewable energy (considering the guideline minimum onsite generation benchmark noted above).

25. Then, calculate an offset price to deliver the remaining renewable energy requirement offsite, which would either be secured via a developer contribution or, in some circumstances, for example where developers have other property in the Greater Cambridge area, the developer could deliver these offset projects themselves. The following formula would be used to calculate the offset payment:

- **Offset payment** = [predicted amount of energy use (kWh) – predicted annual renewable energy generation (kWh) x energy offset price (£/kWh)]
- Work carried out as part of the 2021 Bioregional Net Zero Carbon evidence base⁸⁹ to support the development of P⁸⁹ 3 core principles that should be applied to the development of any offset fund:
- **Sustainability:** in order to achieve Net Zero by 2050, Greater Cambridge will need to limit carbon emissions in line with its carbon budgets. It is therefore important that offsetting accelerates progress, rather than slowing it down.
- **Additionality:** ensuring that measures funded by the offset fund would not have happened without it (or at least they are not double counted).
- **Transparency and accountability:** showing where the funding has been spent and what it has achieved is critical.

26. Setting the offset price at the right level is critical. It is important to ensure that the price does not disincentivise efforts to reduce energy demand and maximise renewable energy generation on site. While the traditional approach in older local plan precedents has been to set a price per tonne of carbon, given the nature of policy CC/NZ and the metrics used, the difference of complying or not with the policy is likely to be due to limited photovoltaic (pv) potential generation on site. Therefore, basing the offset price on the cost of delivering PVs offsite (e.g. on another new building), would ensure consistency with the policy requirements. This allows the offset mechanism to reflect the exact shortfall (if any) between the development's onsite annual renewable energy generation and its annual energy use. This is an approach that has been taken by several newer local plan precedents adopted since the

Bioregional 2021 work, such as in [Cornwall \(2023\)](#), [Tendring & Colchester \(2025\)](#), and [Uttlesford \(2026\)](#), among others.

27. The 2021 Bioregional Report recommended an approach whereby the offset mechanism is expressed as a renewable energy offset and its price expressed as £/kWh. Using this approach, it recommended a price of £1.50/kWh as the price could be independent of carbon factor changes. More recent 2025 work carried out for Essex County Council by [Introba and Currie & Brown](#) suggests a price of £1.82/kWh. Focussing on the deployment of PVs, the price is based on the deployment of medium-sized PV arrays (10 – 50 kW), a size considered suitable for installation on public buildings and blocks of flats. The projected costs included the annual PV installation cost based on the most recent [pv cost data from Government](#), as well as other maintenance and admin costs. The assumptions behind the cost calculation include the annual installation cost, which includes the cost of the PV generation equipment, costs of installation and connecting to the electricity supply and VAT where applicable. The calculations were based on the median 10-50 kW installation cost of £1,376/kW for the year 2023/2024 adjusted for Q2 2025. The generation levels per 1 kWp were taken from the Photovoltaic Geographical Information Service (PVGIS), based on a generation level of 850 kWh/kWp as a conservative approach for the Essex area. Given the geographical proximity of Greater Cambridge to Essex, this figure is also considered a reasonably conservative approach for the area. The management costs for administering and managing the funding process were assumed to be 10% of the capital costs as typical practice, with a 2.3% uplift assumed as an adjustment for inflation, based on the difference between the Tender Price Index (TPI) for Q2 of 2024 and Q2 of 2025. This process is summarised in tables 3 and 4 below.

28. Table 3: Offset Tariff Assumptions Summary (taken from Essex Renewable Energy Offsetting Framework, Version 1.2 – December 2025)

Assumptions	Value	Unit
Annual installation cost 2023/24 (Median cost for 10-50 kW array)	1,376	£/kW
Generation per kWp	850.0	kWh
Management overhead	10%	Of capital cost
TPI index Q2 2024	392.0	Index
TPI index Q2 2025	401.0	Index
Adjust for Q2 2025	102.3%	% of Q2 2024 cost

29. Table 4: Energy Offset Tariff (taken from Essex Renewable Energy Offsetting Framework, Version 1.2 – December 2025)

Component	Unit	Price
Capital cost per kWp	£/kWp	1,376
Capital cost per kWh generation (<i>capital cost per kWp / generation per kWp</i>)	£/kWh	1.62
Management cost (10% of capital cost per kWh)	£/kWh	0.162
Total cost (pre inflation adjustment) (<i>sum of capital cost per kWh generation and management cost</i>)	£/kWh	1.78
Total cost (adjusted to Q2 2025) (<i>includes 2.3% cost uplift adjusted for inflation</i>)	£/kWh	1.82

30. It is recommended to utilise the more up-to-date cost of £1.82/kWh for the Greater Cambridge Energy Offset approach. This figure may need to be updated in the future as the price of PV installation changes over time due to general inflation, supply and demand influences, and technological advances.

31. In terms of how the offset mechanism would be secured, two options are available. Option one would see the developer pay into an offset fund via a S106 agreement for the development, with these funds then being used to deliver additional renewable energy projects in the Greater Cambridge Area. Option two could see the developer delivering the additional level of renewable energy provision themselves, for example if the developer has other land or other buildings within the Greater Cambridge area on which additional ground-mounted solar could be located. There would be a need for some form of verification to show that the projects funded by the offset mechanism will deliver the required level of renewable energy generation, which could come from renewable energy certification schemes or with the output calculated in line with UK Quality Mark for renewable energy (MCS) guidelines.

32. The S106 agreement should secure the predicted annual kwh of renewable energy generation and separately detail any shortfall in kwh, and the corresponding financial contribution for installation of renewable energy generation capacity.

Assured Energy Performance / Performance Gap management

33. Assured Performance or Building Performance Evaluation is vital if we are to achieve our net zero carbon targets not just on paper but in reality, an aspect that is not currently considered by Building Regulations and that currently represents a considerable gap in national policy. This approach can be used to assess various aspects of a building, including physical properties such as construction quality and operating efficiency and costs, the element of interest to this policy. This approach brings many benefits, including helping to flag potentially serious failures in performance, to guide prompt remedial action and helping to deliver more efficient, better performing buildings overall. For the purposes of Policy CC/NZ, the areas of interest for evaluation are:
- Annual space heating demand.
 - Annual energy use; and
 - Renewable energy generation output
34. There are already a number of schemes operating in the UK which could be used for achievement of this element of the policy, including:
- NABERS – applicable for use on office developments and deemed to comply with some of the requirements of Policy CC/NZ (see table 1). NABERS offers [two ‘products’](#):
 - NABERS Design for Performance: This is a process that involves committing to the achievement of an “in-use” NABERS rating of four stars or higher and demonstrating various steps at design stage to work towards this target (including accurate energy modelling and independent design review).
 - NABERS Energy for Offices: This is a rating reflecting actual measured energy performance in-use. Ratings range from 1 to 6 stars.
 - Passivhaus certification – applicable for use on a range of scheme types both residential and non-residential and deemed to comply with the requirements of Policy CC/NZ (see Table 1). Passivhaus certification can only be achieved on completion of a building. Its robust tests demonstrate that the construction meets a highly thermally efficient standard, but its certification does not involve any period of in-use energy monitoring.
 - UKNZCBS verification – applicable for use on both residential and non-residential development, the UKNZCBS includes a requirement for independent third-party verification and is deemed to comply with some of the requirements of Policy CC/NZ (see Table 1). UKNZCBS verification can only be done using at least one year’s worth of actual metered in-use energy data, but UKNZCBS also offers a “post-

completion on-track” status subject to certain checks and commitment to achieve full verification later.

35. Use of any one of these tools would help demonstrate compliance with this element of Policy CC/NZ and would be secured via a planning condition. However, these certifications and verifications can involve some professional fees and reporting burdens that may be excessively onerous for minor developments. Therefore, for minor developments, a more simplified light-touch approach to mitigating the performance gap will be developed.
36. Post-construction energy monitoring can form a helpful step within assured performance, and some of the assurance schemes noted above would necessarily involve this. While the [draft policy in the 2025/2026 consultation](#) did not include a specific requirement for post-construction energy monitoring, it would be a desirable step in larger developments.
37. For reporting purposes only, major development must report the metered EUI and SHD should be reported back annually for years 1-5 post construction (but not before first occupation), similar to the “Be Seen” mechanism used by the GLA. Renewable energy generation should also be reported over this period, to report against predicted renewable energy generation modelling annually over a 5-year period. However, this post-construction in-use energy monitoring would not trigger a requirement for the developer to take any action if the predicted performance is not being met. Rather, the purpose is learning (by the developer and by the Council) and to reveal, and therefore make it possible to address in future, the performance gap and the effectiveness of the policies.
38. For housing development, the requirement for Post Occupancy Evaluation (POE) would relate to a set number of dwellings across a range of house types, to be agreed. Any requirement for in-use energy monitoring would only be sought in large-scale developments (50+ homes or 5,000+ m² floorspace) for the reason that the administrative and financial burden can be better borne by larger schemes due to economies of scale, and because there will be a need to aggregate any residential metering data to a scale that ensures the data anonymity of each home. Given the metrics used by Policy CC/NZ, this would take the form of information that can be collected from smart meters and renewable energy output data. Technology may also allow on-network monitoring of supply to groups of multiple homes rather than needing individual home meter readings (again to assist with aggregation of data to avoid data privacy issues, as well as administrative practicalities). Assured energy performance is designed to check post completion whether the energy

demand reduction standard and energy efficiency was accurately predicted for the building in use.

Whole Life Carbon Assessment

39. Net zero carbon needs to be considered in the context of whole life carbon, which includes operational emissions (considered in Parts A -C of Policy CC/NZ) and embodied carbon, which is the carbon associated with constructing buildings. Criteria 8 of policy CC/NZ requires all major development to demonstrate what measures have been taken to reduce embodied carbon, with developments of a minimum of 100 homes or 10,000m² of non-residential floorspace required to calculate whole life carbon emissions and demonstrate actions to reduce up-front embodied carbon emissions (modules A1-A5 of the RICS methodology) through lean building design and material efficiency.
40. Consideration has been given as to whether the policy should set measurable targets for reducing up front embodied carbon. While there are a number of emerging 'best practice' approaches to embodied carbon, including the RICS Whole Life Carbon Assessment (WLCA), the LETI Embodied Carbon Primer, RIBA Embodied and Whole Life Carbon Assessment for Architects and UKZCBS, there are no adopted nationally defined 'targets' for reducing the embodied carbon associated with constructing new developments. A further challenge faced by industry is a lack of consistent measurement, leading to misaligned benchmarks, project targets and claims. Targets will only be useful once measurement is consistent. By requiring the reporting of up-front embodied carbon, this will help to provide further evidence from the Greater Cambridge context to support the setting of specific targets in the future.
41. The purpose of the policy (for large-scale schemes as per the threshold described above) is to require a Whole Life Carbon Assessment to provide data on whole life cycle carbon, which will inform future policy requirements. The priority for the policy remains to be the reduction of operational carbon.
42. The first step in demonstrating compliance with this element of Policy CC/NZ is to carry out a Whole Life Carbon Assessment. Until there is a nationally recognised and adopted UK national methodology, the RICS Professional Statement on Whole Life Carbon Assessment is the accepted industry methodology for Whole Life Carbon Assessments. This assessment should be submitted as part of an Embodied Carbon Statement for all developments that meet the thresholds set within the policy – these details can form part of a Sustainability Statement.

43. To demonstrate that schemes have implemented lean building design and material efficiency, the Whole Life Carbon Assessment (provided in full at the Planning Application Stage), should include:

- A summary of the steps taken to design a lean, low-carbon structure and building design. This should take account of efficiency of material use as well as the types of material used. Where possible, applicants should limit the use of building elements with high levels of embodied carbon such as basements, podiums and large cantilevers. Where these are to be utilised, the Whole Life Carbon Assessment (WLCA) should provide justification for their use.
- A calculation of the building or house types form factor (exposed external surface area/gross internal floor area). A lower form factor, which reflects a more efficient or 'simple' building design, often emits less upfront embodied carbon than more complex forms with a higher form factor. This is due to the use of fewer materials and limiting the extent of exposed surfaces.
- An elemental analysis of the upfront embodied carbon ($\text{kgCO}_2\text{e/m}^2\text{GIA}$) associated with three external wall options and two superstructure design options, with justification for the selected wall and structure type.

44. Further evidence is required to set specific standards for Whole Life Carbon (WLC) The policy is designed to facilitate the reporting of WLC to understand the spread of WLC prediction data and what a potential suitable target would be for each use in the specific Greater Cambridge context. To collect this data, a full Whole Lifecycle Carbon Assessment must be submitted at the full planning stage. For outline applications where the design of buildings is not yet known, the application would just need to include initial baseline details on how embodied / ¹⁰ is being considered at this design stage¹⁰, and how it will be approached in the detailed design work, and commit to conducting and submitting the full WLC Assessment at Reserved Matters stage as applicable to the size of the outline development. However, if the likely building designs are known or strongly anticipated at outline stage, such as if the applicant is a volume developer that intends to deliver a standardised housing type as part of their development, then a WLC Assessment of those designs would be welcomed as part of the outline application. The Reserved Matters should add site-specific information to the WLCA submitted at the outline application stage and should contain the actual WLCA based on the detailed design of

¹⁰ For example, demonstrating that the applicant is aware of the factors contributing to embodied carbon outcomes, such as by identifying typical building types that are likely to occur on site, typical materials that are likely to be used and consideration of how embodied carbon could be minimised in the context of the type of development likely to come forward within the parameters of this outline scheme.

the proposed buildings. Where pre-application engagement has been undertaken, the sustainability statement information should reflect consideration of how this information, including the initial approach to reducing WLC and early modelling outputs, will be pulled together and reported. This process may evolve where a development commits to UKNZCBS verification, as the UKNZCBS requires reporting of WLC using the RICS assessment and the achievement of certain targets for up-front embodied carbon.

45. The reporting and evidence requirements for WLC for Policy CC/NZ are set out in Annex 1.

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

Presumption in favour of the reuse of existing buildings

46. Criteria 2 of Policy CC/CE seeks to promote the reuse of existing buildings, requiring applications that involve demolition to clearly demonstrate why the building(s) cannot be repurposed and retrofitted. The aim is to ensure that buildings are not demolished, disposed of and replaced with new-builds by default without consideration being given as to whether the existing building could be repurposed for an alternative use or whether existing materials could be salvaged and reused as part of the development, or offsite as a last resort.
47. Applicants will need to evaluate the suitability, feasibility and viability of refurbishment before considering substantial or total demolition/replacement; such proposals must consider carefully whether all or parts of the building could be retained for use. Applications that include a significant amount of demolition must be accompanied by a robust justification. Where appropriate, the LPA may seek expert advice to help reach a judgement on the information provided, for example structural surveys. As a minimum, the information that should be included as part of such a justification should include:
- The use of the existing building, how long it has been in this use, its age and the purpose of the new building and whether this constitutes change of use.
 - How much demolition is proposed:
 - Percentage of the envelope and structure to be retained by area
 - Percentage of internals to be retained by area.
 - Justification of substantial or total demolition by building layer (skin/shell, structure/frame, building services, and space plan/interior).
 - Explanation and evidence of why the existing building cannot be retained proportionate to the scale and type of development proposed. This must go beyond saying a building is 'low quality' or 'not fit for purpose', and be

proportionate to the scale and type of development, and will need to be grounded within the wider context and benefits delivered by the demolition, which may require details of:

- The existing building's structural condition by means of a structural engineer's report
- Materials from which the existing building is constructed and their condition
- Contamination and the presence of any harmful materials (e.g. asbestos)
- Visual importance of the architecture in the streetscape/location
- Any elements of the building that would limit the ability to retrofit it to higher standards or that repairing, refurbishing, or re-using the building would likely result in similar or higher levels of newly generated up-front embodied carbon (modules A1-A5 of the RICS methodology) compared to demolition and re-construction, with reference to relevant requirements in Policy CC/NZ for new buildings; or
- Evidence that repairing, refurbishing, or re-using the building would create a building with such poor thermal efficiency that, when considering lifecycle embodied carbon (i.e. modules A1- A5, B1-B5 and C1-C4), a lower net-carbon solution would arise from demolition and re-construction; or
- Whether the proposed replacement development will deliver significant public or environmental benefits that could not be delivered through a retrofitting option; and
- Bespoke operational requirements that could not be provided through the repurposing, adaptation and / or extension of the existing building(s).

48. Where demolition is considered to be justified and the amount of demolition meets or exceeds 500m² GIA or more, applicants should ideally carry out pre-demolition audits to ensure that materials arising from demolition, both construction materials and internal fixtures and fittings, can be re-used as far as practicable on site and that opportunities for reuse of any remaining materials off-site are explored. This will help to ensure that circular economy principles are embedded into the design of the proposals. For major developments involving demolition, this pre-demolition audit should be submitted as part of the planning application.

Circular Economy

49. Policy CC/CE seeks to ensure that new developments integrate circular economy principles into their design and construction, with the submission of

a specific Circular Economy Statement for residential development of 150 or more dwellings and non-residential development with a gross internal floorspace of 15,000 m² or more. The policy does not contain explicit requirements for householder planning applications, but the integration of circular economy principles into such proposals is encouraged.

50. Circular economy statements and documented evidence of circular economy principles more widely are used to reveal how a development has taken reasonable steps to extend the life of the building, building elements and materials through designs for longevity, use of recycled materials, and re-use of existing materials both onsite as part of the proposed development and offsite.
51. For the majority of schemes, this information can be provided as part of the Sustainability Statement required under policy CC/SD, with Circular Economy Principles included within the Sustainability Checklist, appended to the Climate Chapter Topic Paper.
52. The submission of a more detailed Circular Economy Statement, according to policy CC/CE, will be required for the following scales of development:
- Residential development of 150 or more dwellings;
 - Non residential development with a gross internal floorspace of 15,000 square meters or more;
 - Major development proposals that involve substantial demolition (i.e. demolition of 500m² GIA or more)
53. A Circular Economy Statement must demonstrate how the principles of Circular Economy have been met in the design. It should be proportionate to the scale and type of development, i.e. scale of demolition. It must also demonstrate that the applicant has considered the re-use potential of the building and has integrated the six circular economy principles:
- 1. building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary
 - 2. designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials
 - 3. designing for longevity
 - 4. designing for adaptability or flexibility
 - 5. designing for disassembly
 - 6. using systems, elements or materials that can be reused and recycled.

54. These principles should be applied to design of the proposal and the choice of materials used in construction to extend the life of the both the building as a whole and the individual building components and elements. Consideration should be given to future uses of the site and not designing a building that is too bespoke such that it cannot be re-used and repurposed easily. A pre-demolition audit should be completed to assist in this process where the proposed development includes demolition of 500m² GIA or more.

55. Refer to principle based applications of Circular Economy Principles using similar examples to the below:

- [Lewes and Eastbourne](#)
- [Circular Economy principles embedded in their Sustainability in Development Technical Note](#)
- [Essex guidance \(short summary of Embodied Carbon and Circular Economy\)](#)
- [LETI Circular Economy Primer](#)

Considerations of Qualitative Policy for Retrofit / Refurbishment

56. As part of consultation on the emerging Greater Cambridge Local Plan, a number of respondents called for quantitative policies similar to Policy CC/NZ for retrofit and refurbishment projects. Retrofit and refurbishment is very different to a new build development from an energy perspective and there are often large differences between embodied carbon content of existing buildings and material. Additionally, there is enormous variation in the type, scale, construction, quality, age and condition of existing buildings, translating into an equally large variation in the energy performance outcomes that can be achieved through retrofit, and the corresponding costs associated with achieving energy performance improvements.

57. Further variation arises when considering the range of different end uses if there is a proposed conversion/change of use. The Councils' do not currently have enough data to set specific standards for each typology of existing residential and non-residential buildings for operational energy or whole lifecycle carbon standards to be set to a level that could be robustly justified in the local plan examination process, as this would necessitate proving that the required standards are universally (or at least generally) deliverable and financially viable to achieve. However, there are standards available that persons undertaking such works may choose to utilise, such as the EnerPHit standard and the UKNZCBS retrofit targets.

58. For the purposes of the Local Plan, policy must look to achieve qualitative policy requirements to demonstrate that major refurbishment development in Greater Cambridge is still meeting wider sustainability and carbon reduction ambitions. Local planning policy can also include wording to actively welcome proposals that would deliver energy retrofit with good outcomes, so as to give confidence to any readers aspiring to bring forward retrofit and dispel any assumptions they may have about planning barriers to their project (and to ensure development management officers give appropriate weight to the benefits of retrofit where proposed).

59. For all new development that is not new build, the hierarchical approach to reducing energy demand and associated carbon emissions will need to be followed, taking a whole-building approach. For heritage assets, the approach set out in Policy GP/CC (Adapting heritage assets to climate change) should be followed. This stepped approach that would be encouraged through this new policy would be:

- Improving the fabric efficiency of the building, including air tightness, insulation and types of fabric (with careful consideration given to ventilation).
- Implementing other energy efficiency measures.
- Utilising low and zero carbon heat sources.
- Delivering and maximising onsite renewable energy generation.

60. The encouragement of this hierarchy does **not** mean that a proposal to add, for example, a heat pump or solar panels to an existing building would be refused simply because the proposal does not also include fabric improvements or other energy efficiency improvements. Interventions lower down the hierarchy can make valuable contributions to carbon reduction on their own and in combination with interventions higher up the hierarchy. The intent is to encourage developers not to neglect consideration of the higher steps, rather than to mandate them.

61. Compliance with the policy will be demonstrated through completion of the relevant sustainability checklist and submission of sustainability statements for both minor and major developments. The policy will provide support for the use of specific standards for retrofit, including the EnerPHit standard and UKNZCBS. The information submitted as part of the Sustainability Statement should provide an overview of the approach being taken under each stage of the hierarchy detailed above, which can also be referred to as Be Lean, Be Clean and Be Green. It should be noted that as the policy does not provide specific standards for retrofit, there will not be any requirement for modelling or carbon emissions and energy performance, albeit it can be useful to

include such metrics and calculations where these are available in order to help inform planning balance considerations, especially for major applications.

62. For residents looking to retrofit their homes, Cambridge City Council has produced a [retrofit guide for householders](#), which provides guidance on typical retrofit measures for a range of house types that are typical of the Greater Cambridge area, taking the whole house approach. Further guidance on retrofit measures is also available via the [Action on Energy Cambridgeshire](#) website.

Proposed policy wording:

1. Proposals involving the retrofit of existing buildings will be supported where these take the following approach:
 2. Follow the energy hierarchy by considering opportunities at each of the following steps:
 - a. Improving the fabric efficiency of the building, including air tightness, insulation and types of fabric (with careful consideration given to ventilation).
 - b. Implementing energy efficiency measures.
 - c. Utilising low and zero carbon heat sources.
 - d. Delivering and maximising onsite renewable energy generation.
 3. Include measures to enhance the climate resilience of buildings, including the inclusion of external shading to reduce overheating risk and the reinstatement of historic features such as external shutters and box blinds.
132. There is no requirement for offsetting energy for any retrofit or refurbishment development.
133. Proposals that seek to utilise specific standards for retrofit, including the PAS 2035 and PAS 2030 Standard, EnerPHit and the UKNZCBS will be supported, with weight accorded in proportion to the degree of energy performance proposed. In particular, conformance with EnerPHit and UKNZBCS is acknowledged to demonstrate exemplary performance. The retrofit of heritage assets should consider the requirements of Policy GP/CC (Adapting heritage assets to climate change).
134. There is no requirement for offsetting to incentivise retrofit and there is no requirement for modelling of energy demand for planning policy purposes, only where there is a requirement to meet Building Regulations, which will be dealt with separately. It should be demonstrated at the pre-planning and planning application stages how the design has reduced embodied carbon

through refurbishment, and at the planning and post-construction stages of development, reporting on WLC is encouraged for major refurbishment.

Annex 1: Summary of Indicative Requirements for how policy compliance is evidenced and what is required at each stage

Minor Development

Policy Area	Document	Pre-App Stage (where applicable)	Planning Stage	Post Completion
Sustainability	Sustainability Statement is encouraged. Could be set out in Planning Statement / Design and Access Statement	Demonstrate consideration of issues required to be addressed in sustainability statement	Provide a full Sustainability Statement (could be integrated into Design and Access Statement or PLanning Statement).	N/A
Operational Energy	Energy Statement is required in new-builds, in accordance with Policy CC/NZ. Could be set out in Planning Statement /	Reducing energy and carbon is encouraged using template information.	Reducing energy and carbon is encouraged using template information. Energy statement for new builds is required.	N/A

Policy Area	Document	Pre-App Stage (where applicable)	Planning Stage	Post Completion
	Design and Access Statement			
Offsetting	Energy Statement	Not required	Offsetting calculation required as a part of the energy statement for new-builds in accordance with Policy CC/NZ.	Not required
Circular Economy (Optional)	If provided, could be set out in Planning Statement / Design and Access Statement	No requirement for document, consideration of Circular Economy principles encouraged.	No requirement for specific document, consideration of Circular Economy principles encouraged.	No requirement for document, consideration of Circular Economy principles encouraged.

Policy Area	Document	Pre-App Stage (where applicable)	Planning Stage	Post Completion
Whole Life Cycle Carbon (Optional)	If provided, could be set out in Planning Statement / Design and Access Statement	No requirement for document, consideration of reducing WLC encouraged.	No requirement for document, consideration of reducing WLC encouraged.	No requirement for document, consideration of reducing WLC encouraged.

Major Development

Policy Area	Document	Pre-Application Stage	Planning Stage	Post Completion
Sustainability	Sustainability Statement	Demonstrate consideration of issues required to be addressed in sustainability statement	Provide a full Sustainability Statement.	N/A
Operational Energy	Energy Statement	Initial modelling assumptions and modelling using PHPP or TM54 to	Full modelling and demonstration of how targets in CC/NZ	No requirement

Policy Area	Document	Pre-Application Stage	Planning Stage	Post Completion
		provide initial view of EUI and SHD	policy can be met.	
Offsetting (required for new development only)	Energy Statement	Initial view on kwh of renewable energy generation onsite.	Full modelling and demonstration of how targets in CC/NZ policy can be met including whether offset of energy is required, and any evidence of exceptional circumstances for negotiation of a fallback position.	Secure agreed offset in kwh and associated financial obligation. Be Seen type mechanism to report on and have review mechanism for EUI and SHD.
Circular Economy (for development over 150 units or over 15,000 sqm (GIA) of floorspace where demolition of	Circular Economy Statement Pre-demolition audit Sustainability Statement	Review of retention of building / initial review of what can be kept / recycled.	Circular Economy Statement	No requirement

Policy Area	Document	Pre-Application Stage	Planning Stage	Post Completion
over 500m ² is proposed)				
Whole Life Carbon ((proposals for large scale new-build developments of a minimum of 100 dwellings or 500m ² of non-residential floorspace)	Whole Life Carbon Assessment Encouragement of WLC reporting until comes into force through UNZBS Whole Lifecycle Carbon Report Whole Lifecycle Carbon reporting template as an appendix	Evidence of measures to reduce WLC carbon	Whole Life Carbon Assessment to be submitted for development of minimum of 100 homes or a minimum of 10,000 sqm.	Encouraged to Re-report WLC calculations on completion with narrative on any changes / differences until UNZBS accounts for WLC.