Appendix B: Summaries of Representations on Climate Change theme

Contents

General comments on Climate Change theme

Hyperlink for comments

Open this hyperlink- Climate change > then go to the sub-heading ‘Tell us what you think’> click the magnifying glass symbol

Number of Representations for this policy: 74

Abbreviations

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

Executive Summary

There was strong support for the general direction of the climate change policies in representations submitted from individuals, parish councils and developers. Some representations asked the councils to ensure that new housing will use up-to-date heating technology and the representations emphasised the need to constantly review the policy in the context of new technologies and government targets. Some respondents felt that the First Proposals omitted important things, such as a retrofitting policy and the provision of gardens or allotments which could store carbon. Several representations also objected to policies on the grounds that the level of development in the Local Plan would exacerbate pre-existing water issues, thereby negating the climate change policies. Other representations, including one by the Cambridge Doughnut Economic Action Group also objected, arguing that growth and sustainability are incompatible. Some developers and landowners supported the policies and often explained how their site could fulfil these policies. Other developers, such as Southern and Regional Developments Ltd, objected to the policies because they thought that the proposed standards were too high which would make the policies undeliverable.

Table for comments on 'Climate Change' theme

Summary of issues raised in comments	Comments highlighting this issue
Support for policy aims and prioritisation of action to address climate change	**Individuals** 56911 (D Sargeant) 57670 (J Conroy), 57794 (J Pavey) 58205 **Public Bodies** 56877 (Bassingbourn-cum-Kneesworth Parish Council), 56944 (Cambridgeshire County Council) 57364 (Huntingdonshire DC), Linton PC (58405), 59187 (Cambourne TC), 59089 (Great Shelford PC), 59266 (Cambridgeshire and Peterborough Combined Authority), 59477 (Shepreth PC), 59695 (Central Bedfordshire Council), 59861 (East Cambs DC), 59972 (Natural England), 59166 (Cambridgeshire and Peterborough Clinical Commissioning Group CCG) **Third Sector Organisations** 57769 (Carbon Neutral Cambridge), 58016 (Imperial War Museum/ Gonville and Gaius College), 58493 (University of Cambridge), 58936 (St John's College Cambridge), 59014 (RSPB Cambs/ Beds/ Herts Area), **Developers, Housebuilders and Landowners** 57203 (Abrdn), (Universities Superannuation Scheme Retail), 58310 (Hallam Land Management Limited),

Summary of issues raised in comments	Comments highlighting this issue
	58423 (Marshall Group Properties), 58696 (The Church of England Commissioners for England), 58747 (Trumpington Meadows Land Company a joint venture between Grosvenor Britain & Ireland and Universities Superannuation Scheme), 58811 (CBC Limited, Cambridgeshire County Council and a private family trust), Grosvenor Britain & Ireland (59064), 60221 (Thakeham Homes Ltd), 60282 (Commercial Estates Group) 60550 (Thakeham Homes Ltd)
The climate crisis means we need to move away from GDP-led models of growth, which locally have meant disproportionate influence of the university and business lobbies in development and planning. Instead, the process should be led by democratically accountable public bodies and communities. This would enable the promotion of other forms of land ownership such as community land trusts and community-led housing, etc.	56528 (C Preston)
Cambridge can grow economically without a huge housebuilding programme, with its attendant water and embodied carbon issues. Nowhere in the plan is the basic methodology of household formation questioned. 80% of jobs created by new homebuilding are service jobs, largely servicing the new residents. Thus, of the 58,000 projected new jobs, only 11,600 will be in the Value Added category of hi-	56555 (M Brinkley)

Summary of issues raised in comments	Comments highlighting this issue
tech/bio med. And many of these will not require a 5 day a week presence. With improved rail connections, many of these hi-tech workers could be housed in existing communities up to two hours away, which would spread the envisioned prosperity.	
Front-fund infrastructure investment particularly in water resilience-this is key to all future development decision making. Emphasis should be made on protecting all existing flood plains and water courses.	56614 (Gamlingay PC)
Recommend changing the wording of the policy: "Achievement of these budgets…" to say "Staying within this budget…" or "Staying within these budgets…". I think you're really talking about the GC budget here, so I wouldn't use the plural.	56687 (D Fox)
Land used for growing food also contributes to carbon storage. A study (attached in the Rep) states that "Covering only 0.0006% of Great Britain, allotments contribute a disproportionate 0.05–0.14% of nationwide total organic carbon stocks." I would like to see the additional carbon storage in newly-planned allotments, community gardens and market gardens in Greater Cambridge quantified and added to our carbon budget.	56688 (D Fox)
All new housing must be required to use the most up to date solar/alternative heating and insulation and consideration of new zero	56738 (Croydon PC), 56877 (Bassingbourn-cum-Kneesworth Parish Council), 58587 (Cambridge Past,

Summary of issues raised in comments	Comments highlighting this issue
carbon technologies and government targets needs to be kept under review.	Present & Future) 60192 (J Preston), 60745 (Cambridge and South Cambridgeshire Green Parties) 58717 (Wates Development Ltd), 58722 (Wates Developments Ltd)
Page 6, para 1 – some data on things like rising sea level and impact on our area (maybe a map) might add valuable context for the reader.	56877 (Bassingbourn-cum-Kneesworth Parish Council)
In most cases, under “What alternatives did we consider?” there is no mention made of tougher climate change policies. These policies are a good start but given the magnitude of the crisis, even more stringent, urgent measures should be evaluated.	56886 (J Price)
Concerned by the poor construction quality in the new developments and that this may be undermining their 'green' credentials. A significant percentage of the promised green benefit may be being undermined by poor construction and lack of developer commitment.	56973 (Trumpington Residents Association)
I don’t agree with the scale of development. But if it is to happen then very tough requirements on CO2 emissions for construction and operation are right. Anna Mackenzie’s webinar presentation says we will spend the Greater Cambridge CO2 budget in 6.1 years if we continue at the 2019 rate.	57038 (Dr W Harrold)
Your support for EWR is contrary to your climate goals – it’s (still unpublished) business case must depend on unnecessary infrastructure and housing around EWR stations – why do you support it? The local connectivity problem should be solved by the GCP.	57038 (Dr W Harrold)

Summary of issues raised in comments	Comments highlighting this issue
Concern is raised in respect of the approach to dealing with villages in the emerging Local Plan where only low levels of new homes are proposed. It is considered that the Council should consider improving public transport links to the rural areas to ensure that the rural population have a real alternative to the private car.	57167 (Southern & Regional Developments Ltd) 57237 (European Property Ventures Cambridgeshire)
The Council's policy on Climate Change is not considered to be achievable or deliverable and it is considered that it runs counter to advice in NPPF paragraph 16 (b) that states that Plans should be prepared positively in a way that is aspirational but deliverable.	57167 (Southern & Regional Developments Ltd) 57237 (European Property Ventures Cambridgeshire)
We encourage a broader strategic vision on the role of electric vehicles in delivering on the objectives to tackle climate change. We have included comments under policy "I/EV: Parking and electric vehicles". With the sale of new petrol and diesel cars ceasing in 2030, EV ownership and addressing the infrastructure requirements for the management and powering of EVs will play a central role in tackling climate change during the plan period.	57194 (R Cowell)
The first priority for new development should be to redevelop brownfield land in existing town centres. This is the most effective way of ensuring new development limits carbon emissions as it reduces the need to travel long distances for commuting, education, and leisure. Increasing density on brownfield sites and adding residential uses to	57203 (Abrdn), 57270 (Universities Superannutation Scheme), 58205 (Universities Superannuation Scheme Retail)

Summary of issues raised in comments	Comments highlighting this issue
town centres can be a significant driver of limiting carbon emissions across Greater Cambridge.	
The unique and protected Chalk Hills and river systems are a serious concern with regards to protection and management and any large scale development will exacerbate these difficult issues. Stapleford has suffered flooding and the river run dry. A length of cycle/footpath alongside the A1301 was replaced when the river broke its banks causing flooding on the A1301, putting cyclists in danger. Water management is a key local concern.	57521 (Stapleford PC)
The village has declared a Climate Emergency and we are embracing climate change policies in all our decisions. Building on the Green Belt meets does not meet our policy statements.	57521 (Stapleford PC)
We would like to see measures adopted to make it easier for homeowners to upgrade the energy efficiency of existing homes. For example, by eliminating the need to get planning permission to install rendered external wall insulation or PV panels (unless this was essential to preserve important heritage aspects)	57769 (Carbon Neutral Cambridge)
Reducing Carbon is not just about making personal car use difficult. We have major concerns that making personal car ownership hard for an easy win is not a good decision. A wider view is needed.	57805 (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Our water courses are already in a real mess from over abstraction and too much poorly treated sewerage. Serious money needs to be allocated to a strategy and action plan that will undo past damage and not just cope with further development. There will be a need for working closely with adjoining areas for rivers and stream whose catchments stretch beyond the Greater Cambridge Plan boundaries.	58929 (W Wicksteed)
The preparation of the Local Plan should focus on those issues that have the most impact on the decision-making for the Local Plan, including: • setting policies to reduce operational carbon emissions from new development; • assessing whole life carbon emissions to account for a balanced approach to embodied and operational emissions for new buildings; • promoting patterns of development that reduce the need to travel; and • locating development where a choice of travel options exist other than the private car. LPAs should therefore be: • encouraging transport choices that have less impact on the climate, such as walking, cycling and public transport;	57895 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
• promoting self-containment and sustainable settlements, where public transport can easily be supported and a wide range of facilities and services are within walking and cycling distance; • allocating development where public transport infrastructure already exists, is planned, or can be provided, to encourage sustainable travel. Further recommendations for the Plan include: • Care needs to be used in prioritising each of these themes. A balanced approach should be used. • Each policy of the new Local Plan, and each potential site for employment or housing (or both), will have different impacts that are nuanced depending on proposals and site locations. • The Sustainability Appraisal is the key to understanding relative impacts on the four big themes. However, the location and design of development will play a key part in achieving key principles of sustainability, including minimising operational carbon emissions and the effects of movements, which relate to climate change, wellbeing, social inclusion and place making.	
To achieve net zero and still grow the economy we would need to decouple emission quantities completely from growth, not just reduce or mitigate them. Several economic projections including one by the	57983 (Cambridge Doughnut Economics Action Group)

Summary of issues raised in comments	Comments highlighting this issue
UN Environment Programme indicate that such “absolute decoupling” cannot occur and “green growth” is simply not possible in practice. This Plan calls for an average growth of the machinery of the economy of around 1.2% per year. The UK economy is currently growing at around 3% per year per capita long-term average, so the plan will grow the local economy by over 4% per year. If we are to believe the plan will “help”, then it needs to demonstrate how it will reduce the emissions in Cambridge by more than 4% per capita per year. Otherwise (as it seems) the plan will simply “make it marginally less hard than it might otherwise be for Greater Cambridge to reach net zero”.	
This could go further in terms of sustainability	58027 (Great and Little Chishill PC)
The 40% expansion of houses over 21 years is incompatible with the requirements of climate change. Just building these houses will create around 5 million tons of CO2. Even with your limits on water supply that number of homes will require over 10 million litres of water per day. Growth is always exponential and in 100 years your growth rate for Cambridge will have increased housing by around 500% which is totally unsustainable.	58038 (J Carroll)
Yes, we can all become greener and produce less carbon, but in this part of the UK the issue is going to be water shortage. It's madness to	58056 (Bruce Marshall)

Summary of issues raised in comments	Comments highlighting this issue
bring in more people when the amount of water available is finite and is decreasing with global warming.	
Flooding is already a serious problem in the fields immediately to the south of the city. During January 2021 a lot of the fields were under water. Further development would make this worse. Climate change threatens an increase of 35% in winter rainfall above the current levels, so permitting development of this land now seems very irresponsible.	58172 (S Kennedy)
DB Group's strategy is focused on improving sustainability within the construction sector, and the company seeks to reduce their environmental impact in everything they do. Local production and use of Cemfree ultra-low embodied carbon concretes can play a part in the Councils plans for more sustainable development across Greater Cambridge. The Council should be proactively working with DB Group, and companies like them, to ensure that the Council enables them to achieve their full potential in terms of contributing towards this goal.	58272 (DB Group Holdings LTD)
Agree that development should be located so that low carbon transport links can be accessed. However, such locations should not be chosen based on proposed busways – the delivery of these is uncertain and their construction generates carbon emissions through the embodied carbon in the building materials, tree felling etc. is contrary to the	58587 (Cambridge Past, Present & Future) 60192 (J Preston)

Summary of issues raised in comments	Comments highlighting this issue
Council's net zero carbon agenda. Most of the busways are also in the green belt.	
Support the Councils' aim to transition to net zero carbon by 2050 and recommend that this provides further justification as to why the Plan period should be extended to 2050 as detailed in the response to Policy S/JH. The Commissioners wish to reiterate the comments made in response to Policy S/DS and Policy S/CB where reference is made to the Councils' identification of development at Cambourne being the most sustainable outside of Cambridge. This is in part due to the proposed infrastructure works in the area which would help reduce carbon emissions.	58696 (The Church of England Commissioners for England)
Well-designed residential development can contribute to carbon offsetting through tree planting, and delivery of sustainable technologies such as water reduction, etc., whilst encouraging existing and new communities to adopt more sustainable methods of travel, including provision of attractive open spaces and green linkages to encourage walking and cycling. Provision of Sustainable Drainage Systems (SuDS) within new development can also alleviate existing fluvial and pluvial flood issues.	58717 (Wates Development Ltd), 58722 (Wates Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Climate change policy should not be overly prescriptive such that it provides a barrier to sustainable development.	
The current development strategy fails to maximise the opportunities for sustainable development in the southern areas where the areas in close proximity to public transport links are not allocated for growth.	58912 (Phase 2 Planning)
The current focus on larger-scale development, does not necessarily result in the benefits of new housing being distributed among existing communities, and the fact that new development also addresses issues and brings with it other benefits, including environmental enhancements, and the contribution that new development makes towards sustaining and enhancing local services. It is therefore considered that there is a need to balance the growth strategy to ensure that the needs of existing settlements are met, alongside the larger strategic elements in Cambridge and in the main growth areas.	58912 (Phase 2 Planning)
The policy direction should apply to the delivery of new floorspace only. The policy should also allow for viability considerations, as not all developments will be able to meet other requirements and obligations required by the emerging Greater Cambridge Local Plan.	58971 (Metro Property Unit Trust)
Focusing development on the edge of Cambridge in immediate proximity to employment and to planned public transport improvements	58988 (Jesus College- working with Pigeon Investment Management and Lands Improvement Holdings- a

Summary of issues raised in comments	Comments highlighting this issue
is demonstrably the best strategy to enable growth to take place consistent with climate change objectives.	private landowner and St John's College) 59536 (Countryside Properties – Bourn Airfield) 60282 (Commercial Estates Group)
Nature-based solutions, where habitat creation and retention help mitigate carbon emissions are also an important element to include which highlights the overlap between the climate change and biodiversity policies in the plan.	59014 (RSPB Cambs/Beds/Herts Area)
We support regenerative and agro-ecological farming and we prioritise local, seasonal food that is good for the planet. Our local plan should reflect this need through: • space for small scale vegetable and fruit growing, either as a tenanted farmer, community supported agriculture or on the model of CoFarm • provision of allotments, a community garden and orchard • A marketplace and encouragement for local growers to have an outlet for their produce in order to support access to local fresh produce	59062 (Cambridge Sustainable Food CIC)
We request that the NHS is supported in seeking to deliver more sustainable facilities and services to meet the needs of the population.	59166 (Cambridgeshire and Peterborough Clinical Commissioning Group CCG)
Concerned that growth remains a priority in the plan when to counter climate change we actually just need to consume less and build less.	59221 (Teversham PC)

Summary of issues raised in comments	Comments highlighting this issue
Zero emissions should be the target rather than carbon neutrality which allows for pollution as long as there is a counterbalance.	
Concerned at Council's promotion of house building at levels that exceed already-inflated government targets and that will have destructive effects on the river system. The chalk streams are increasingly polluted by industrial waste, and runoff from agricultural and non-agricultural pesticide-use, and are also drying up. The proposed development, with its excessive targets to build homes, will exacerbate these problems. The Environment Agency has requested that water companies and farmers reduce abstraction and it encourages more efficient use of water. Moreover, it maintains that any further growth will harm the environment. It says there is insufficient water to supply the existing population, let alone an expanded one. The Integrated Water Management Study, the Stantec Report, found that that low, medium and high regional growth scenarios all have a deleterious impact on the river system. To fill 'the water gap' it is proposed that water be transferred, by building new infrastructure from areas which are already losing jobs and people to the Cambridge area. This would draw another resource from areas from which jobs and people are migrating. Surely it is better to encourage jobs in and movement of people to the places where the water and houses already exist?	59461 (S Buckingham)

Summary of issues raised in comments	Comments highlighting this issue
The local plan makes no reference to the provision of sustainable water supplies, reduced flood risk and effective waste water treatment; these should be established as baseline conditions for any new development.	
The targets presented within the GCLP will introduce some of the highest sustainability standards in the UK at a time when the housebuilding industry is already responding to the introduction of the Governments Future Homes Standard. Given the volume of new homes required within Greater Cambridge there is a risk that the introduction of these standards will restrict the delivery of new housing particularly given that the supply chain is currently not able to deliver these standards at volume. These challenges will also be particularly acute for smaller housebuilders which may further restrict delivery and diversity within the market. It is important that the sustainability policies do not restrict the delivery of much needed new private and affordable housing across the county. To meet the requirements of the NPPF, these policies must be supported by a robust evidence base and viability assessment that demonstrates these policies and targets are deliverable.	59536 (Countryside Properties – Bourn Airfield)

Summary of issues raised in comments	Comments highlighting this issue
Historic England considers looking after and learning from the historic environment contributes positively to overall global sustainability and can help us adapt to and mitigate for climate change. Further details of Historic England's position on Climate Change and Sustainability can be found via the following link: Https://historicengland.org.uk/whats-new/statements/statement-onclimate-change-and-sustainability Heritage assets themselves can be affected by climate change, particularly in the case of buried water-logged assets. Heritage assets can also be a valuable aid to achieving sustainable development, in both climate change mitigation and adaptation, rather than a constraint.	59668 (Historic England)
The combination of unproven employment markets and unsustainable travel patterns associated with the new towns raises questions around the proposed strategy towards employment growth in these areas, and it is considered that this is contrary to the aims of the central climate change theme. Putting more development in new settlement areas could lead to more unsustainable travel patterns.	60282 (Commercial Estates Group)
Keen to have future conversations to share experiences and to understand how net zero carbon can be achieved in terms of viability,	59695 (Central Bedfordshire Council)

Summary of issues raised in comments	Comments highlighting this issue
and to explore how this can be monitored to ensure the approach is successful.	
The settlement of WNT and Waterbeach village on the Environment Agency flood maps show them to be vulnerable and prone to flooding from fluvial, surface water and sea level rise. How will residents and important farmland be protected due to the proposed accelerated growth of WNT in the draft GC plan?	59847 (Waterbeach PC)
How will GC planning ensure net gain offsetting targets in the draft local plan are met due to the accelerated growth of WNT? How will it be monitored and manage to obtain “net gain”	59847 (Waterbeach PC)
WPC seek to know if the proposed accelerated growth will affect GC zero carbon targets and how will it affect the GC aspirations in the draft local plan?	59847 (Waterbeach PC)
Minor OBJECT that the Policies as written are aspirational rather than achievable. Need refinement such as: • avoidance of new build. This is a higher priority since this avoids embodied carbon. The economic and housing growth targets proposed in the Plan are excessive. The proposed relocation of the WWTW is a second prime example of avoidable new build. • reuse of existing buildings should be emphasised	59911 (Fen Ditton PC)

Summary of issues raised in comments	Comments highlighting this issue
• a ‘brownfield first’ policy for new building • halting the use of scarce farmland for solar energy generation • recognising that not all electricity has the same cost and carbon content. Peak power is much worse the shorter the time period over which it occurs also depending on the time of day and year when it occurs. • Solar installations might be mandated on all industrial buildings, new and existing. The cost, cost sharing and carbon footprint of district heating/cooling needs to be investigated and a comparison made of air source and ground source HPs. It is insufficient, even if convenient, to treat each building in isolation. The role of the grid to supply part of the demand must be described since this has access to low cost and carbon sources as well as providing resilience. • Does the Plan envisage “smart” demands that avoid short duration peaks in the system? • The role of hot water storage should be described since this avoids use of power in short duration peak periods.	
Recommends that the vision should advocate a more holistic approach to securing multi-functional benefits through the protection and enhancement of the natural environment. In accordance with paragraphs 17 and 109 of the National Planning Policy Framework (NPPF) the Plan should encourage multiple benefits	59972 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
from the use of land in urban and rural areas, recognising that land can deliver a wide range of ecosystem services required for sustainable development including climate change mitigation, flood management, amongst other benefits. The Plan should contribute to and enhance the natural and local environment by recognising the wider benefits of ecosystem services, considering a natural capital evidence approach and making strong links to the Nature Recovery Network and the Cambridge Nature Network.	
On construction and climate, please allow for the urgency of the climate crisis - whole life calculations may be looking past the tipping point.	60818 (North Newnham Residents Association)
The rate of change in and around Cambridge over the past 30 years has been significantly greater than for just local needs, mainly to develop nationally important economic development. This Plan continues this approach despite the issue of climate change and water supply and large amounts on new development still to be implemented from current Local Plans. The time has now come to step back from this direction of travel and begin to reduce the scale of growth around Cambridge using the Low option as a first step.	60121 (C Blakeley)

Summary of issues raised in comments	Comments highlighting this issue
Given the aims of the Plan and the input of the Net Zero Carbon study, I hoped for a more radical Plan which addressed climate change and zero carbon targets through aiming to reduce the total amount of new development to meet local needs need and move to a position which is in line with Government targets in the next planning round	
Transition to net zero carbon by 2050 necessary but inadequate. Critiques of policy include: • 'Net zero' refers to a situation where ongoing emissions of carbon are balanced by carbon sinks. However, the level at which atmospheric carbon eventually stabilises will be determined by the total accumulated emissions up to that point, not by the balance between sources and sinks in that moment. Therefore, it is critical to a) radically reduce emissions as early as possible in this time period and b) protect stocks of carbon, such as those in soils and vegetation, to prevent their release to the atmosphere. The Local Plan risks driving large emissions in the short term (from materials and emissions used during building works) in the name of achieving net zero balance in the long term. This will not avert climate disaster. • Note that a total carbon budget for Greater Cambridge of 11 million tonnes for the period 2020-2100 has been calculated (page 143, First Proposals). This must be given equal weighting and emphasis with the net zero target.	60745 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
• Success of the policies on new buildings will depend on how well they are implemented by developers. Look forward to seeing more detail on how the Planning Authority will assure quality control as the Local Plan begins to be implemented.	
Supports the Council's prioritisation of managing water resources as a fundamental part of climate change response. Anglian Water provides two clarifications: • Amendment needed for Climate Change topic paper (page 23), to show that Anglian Water currently supplies residential properties in parts of Northstowe. • There is a tension between the OWCS conclusion that integrated water management can be applied on smaller sites (page 41 of the Climate Change topic Paper) and the prior observation that the Environmental Agency have concerns about deliverability of water efficiency through the planning system. Given the priority attached to climate adaptation and resilience by respondents (page 125) that tension will need to be resolved in the final Local Plan.	60486 (Anglian Water Services Ltd)
Criticisms of the policy include:	60192 (J Preston)

Summary of issues raised in comments	Comments highlighting this issue
• The definition of a Net Zero Carbon building set out in the Evidence Base does not include its embodied carbon, this is a very serious omission. • Build for future re-use, including requiring use of lime mortar does not cement to enable re-use of fired and quarried materials. • Already out of date in terms of Government targets (e.g. the Heat and Buildings Strategy, not mentioned in the draft Plan), and rapidly developing guidance and best practice. • There are serious quality control challenges in relation to whether aspirational aims are actually delivered. • Projects proposed to help achieve net zero need to be both delivered and safeguarded, throughout the Plan period.	
Concern that the First Proposals deal only with new development and ignores existing built environment. Retrofit should be within the direct scope of the Plan whenever it involves works which could potentially require planning permission or listed building consent. Would like to know what proportion of the projected demand for new homes and jobs could be met through a programme of retrofitting. It seems an important piece of evidence when assessing the Local Plan.	60192 (J Preston), 60745 (Cambridge and South Cambridgeshire Green Parties), 57038 (Dr W Harrold)

Summary of issues raised in comments	Comments highlighting this issue
Retrofit is also within the scope of the Sustainable Design and Construction SPD, which needs to be updated to include embodied carbon, over the whole life cycle of construction	
No mention whatsoever of the need for a different approach to buildings of traditional solid wall construction. These may form at least a quarter of the existing stock; this proportion should have been considered and assessed as part of the Evidence Base.	60192 (J Preston) 60745 (Cambridge and South Cambridgeshire Green Parties)
Specific challenges of traditional buildings, and the risks of unforeseen consequences are highlighted in PAS2035. However, the PAS is published by the British Standards Institute, costs £190, and so is inaccessible to homeowners. The Climate Change section of the Plan should quote key principles and guidance from PAS 2035 and its non-domestic counterpart PAS 2038 to ensure that people dealing with traditional buildings have access to the appropriate advice and skills to ensure that their buildings are put in good repair, and then suitable retrofit measures are applied as appropriate.	60192 (J Preston) 60745 (Cambridge and South Cambridgeshire Green Parties)
ECDC is interested in continuing to work closely on the aspects in your Plan relating to climate change and the natural environment, recognising that these matters are clearly ones that will require cooperation and shared learning across all organisations and administrative areas. We would be happy to assist with your evidence base on these matters should you find that helpful.	59861 (East Cambs DC)

Table of site-specific comments posted under 'General Comments on Climate Change'

Note: the sites are highlighted in yellow

Summary of issues raised in comments	Comments highlighting this issue
Bourn Airfield already benefits from a recommendation for outline planning permission and is supported by a strong sustainability strategy that deploys extensive renewable energy technologies across the development.	59536 (Countryside Properties – Bourn Airfield)
Focusing development on the edge of Cambridge in immediate proximity to employment and to planned public transport improvements is demonstrably the best strategy to enable growth to take place consistent with climate change objectives. At Cambridge South, comprehensively planned development would have the additional benefit of integrating social, recreation, retail and support facilities to reduce the need to travel. The opportunity exists to plan an exemplary urban extension.	58988 (Jesus College- working with Pigeon Investment Management and Lands Improvement Holdings- a private landowner and St John's College)
Note S/NEC Policy is contrary to ambition/values: Carbon expenditure, emissions, and embedded carbon to decommission fully operational CWWTP and decontaminate site and build new plant within 1 mile of existing inclusive of transfer tunnels, HGV traffic etc., should be factored into carbon expenditure associated with fulfilment of S/NEC Policy	57670 (J Conroy)
Horningsea Parish Council believes the proposal to relocate the Cambridge Waste Water Treatment Plant - a fully functioning waste water treatment plant - to Green	58066 (Horningsea PC)

Summary of issues raised in comments	Comments highlighting this issue
Belt is a waste of taxpayers' money, a waste of Green Belt and an unnecessary contribution to the effects of climate change.	
Cambridge East is being planned to achieve an exemplar development which can act as a flagship for the Councils' objectives. By pioneering new technologies and considering the long-term welfare of our planet and its people, we believe Cambridge East can create a transformative green infrastructure connecting the City with the countryside that sets the new global standard for sustainability. There is potential for the sustainability benefits of Cambridge East to be even greater if development also includes land east of Airport Way. The ambitions of Cambridge East include: • net zero embodied carbon and net zero operational carbon through careful design of infrastructure, carbon offsetting through local (if possible) sequestration via the creation of new or enhancement of existing areas of woodland and other habitats, sustainable water management for the wider area (not simply for the benefit of Cambridge East), and creating a 'green link' which will encompass many climate initiatives such as using green infrastructure to reduce the impacts of climate change (e.g. providing shade and reducing overheating). • These commitments are set out in the Sustainability Vision that Marshall submitted in February 2020. These commitments will be developed further through Marshall's joint working with the GCSP. • In line with the climate approach of the Local Plan, the ambitions of Cambridge East seek to provide a net zero operational development and reduce embodied carbon to net zero through construction.	58423 (Marshall Group Properties)

Summary of issues raised in comments	Comments highlighting this issue
• Offsetting would ensure consideration at an on-site and local scale where feasible. To provide a holistic approach to carbon offsetting, it is recommended that consideration is given by GCSP to a holistic carbon offsetting strategy, and the demarcation of potential sites where the offsetting of the carbon impacts from allocated Local Plan development could bring additional local benefits. This will ensure that this intrinsically important, yet often difficult to apply, policy is targeted, local, and achievable. • Marshall is happy to work in collaboration with GCSP to develop, agree and achieve a strategy which works for all. Through collaboration a truly balanced plan will be created, in which the 4 pillars of the Local Plan objectives are achieved by embracing growth rather than resisting it.	
The strategy informed by carbon assessment that highlights impact transport emissions can have, promotes patterns of development that enable low carbon transport modes, shifting away from reliance on private car. Many rural settlements are sustainably located on public transport networks, having good access to local services, facilities, and employment opportunities. Land West of London Road, Fowlmere benefits from local employment, primary school, village hall, recreation ground and places of worship, serviced by two bus services, to Cambridge and other settlements with train stations.	58717 (Wates Developments Ltd)
Land West of London Road, Fowlmere is proposed to contribute to carbon offsetting through the provision of a landscape strategy, including additional tree planting, provision of sustainable drainage systems that are multi-functional, and delivering an attractive open space in the form of a village park. The proposed development would also deliver low carbon housing, electric vehicle charging at every dwelling and	58717 (Wates Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
promote low water consumption, therefore proactively mitigating the effects of climate change through reducing overall carbon emissions.	
Proposals at Whittlesford would provide 300 Net Zero homes and a NBG, making a positive contribution to reducing CO2 emissions and nature recovery.	59064 (Grosvenor Britain & Ireland)
The site 'Land East of Cambridge' has the potential to significantly contribute to mitigating against the impacts of climate change. It could: • provide a range of new housing and employment opportunities in an established location where sustainable transport is the key method of travel, helping reduce carbon • emissions and pollution brought about through road congestion which is a key issue in Greater Cambridge. These are benefits which simply cannot be replicated on other sites, especially those in locations further afield, because they cannot necessarily rely upon development coming forward close to existing and well-established employment sites, such as those at PTP, the Biomedical Campus and Addenbrooke's Hospital. • The delivery of new homes to zero carbon standards will also help improve the standard of housing stock in Cambridge and reduce ongoing emissions from housing.	60282 (Commercial Estates Group)
Land East side of Cambridge Road, Melbourn offers an opportunity to deliver much needed growth to the settlement, to support local housing need and enhance social cohesion. The site is in a sustainable location, in proximity to services and facilities and is available for development. It is considered that development within this	58722 (Wates Development Ltd)

Summary of issues raised in comments	Comments highlighting this issue
location will encourage future occupiers to adopt sustainable modes of transport, supporting healthy lifestyles and seeking to mitigate the impacts of climate change.	
The CBC 2050 Vision for growth at Cambridge Biomedical Campus aligns with GCSP's goals and it is our intention to ensure that development mitigates and can adapt to the impacts of climate change through measures such as management of water supply, mode shift, local living, green infrastructure and net zero buildings. We envisage close joint working with GCSP, stakeholders and local communities to co-design steps towards these outcomes. The Greater Cambridge Local Plan Strategic Spatial Options Assessment - Integrated Water Management Study, November 2020, identifies how growth is most preferable concentrated in new settlements or urban extensions to maximise opportunities for high standards of design for efficient water usage and re-use, and multi-functional blue-green infrastructure. Specific ways in which future development must meet these objectives are anticipated to be agreed with GCSP through the development of the general and site specific local plan policies.	58811 (CBC Limited, Cambridgeshire County Council and a private family trust)
Both parties are committed to finding sustainable access solutions for future proposals with an accent on walking, cycling and public transport to an expanded Whittlesford Parkway. In addition, the partners emphasise that the "raison d'etre" of the Avtech proposal is to research and manufacture low carbon forms of air mobility. IWM decarbonisation plan to bring IWM Duxford to net zero by 2035, and infrastructure investment to ensure the historic site is resilient the impacts of climate change is already underway. The Avtech proposal would align to these approaches	58016 (Imperial War Museum/ Gonville and Gaius College)

Summary of issues raised in comments	Comments highlighting this issue
and support the GCLP climate change policies. In combining the land resource of IWM Duxford and Caius the Avtech development is of sufficient scale to be commercially viable and accommodate designing for climate change and any environmental mitigations.	

CC/NZ: Net zero carbon new buildings

Hyperlink for comments

Open this hyperlink- Policy CC/NZ: Net zero carbon new buildings > then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

Number of representations for this policy : 81

Executive Summary

The general thrust of the policy attracted a significant level of support from parish councils, organisations such as Carbon Neutral Cambridge CPPF and the Wildlife Trusts, members of the public and some of the area's developers and landowners including the University of Cambridge and Marshall Group. Some of those supporting the policy made suggestions as to how the policy could be refined and improved, with a number of consultees noting that while the policy contains specific targets related to energy use in buildings, more defined targets are needed to take account of embodied carbon associated with demolition and remediation of sites. For some, for example the University of Cambridge, while the general approach to the policy was supported, flexibility ws requested in the application of some of the targets to take account of different building types where a more nuanced approach may be needed.

Those objecting to the policy, primarily developers and the Home Builders Federation, were concerned that the delivery of net zero carbon policy is not a matter for planning but should be left to Building Regulations and the emerging Future Homes Standard. They raised concerns around the technical feasibility of the policy, impact on viability and implementation of the policy. The issue of policy implementation was also raised by some Parish Councils. It was also considered that policy should only consider regulated energy and not unregulated energy (energy used by plugged-in appliances) as these are outside of the control of developers. Many considered that the delivery of net zero carbon was best left for national standards and that the role of the decarbonisation of the grid also needed to be recognised. There were also objections to the reference in policy to there being no

new gas connections. Members of the public and some parish councils also raised concerns that the policy did not contain targets for existing buildings and did not recognise the importance of reusing rather than demolishing existing buildings.

Table of representations for CC/NZ: Net zero carbon new buildings

Summary of issues raised in comments	Comments highlighting this issue
Support for policy and targets therein	**Individuals** 56503 (D Clay), 57588 (R Pargeter), 57671 (J Conroy), 57823 (D Lister), 58305 (I Butnar), 58714 (H Brown), 60122 (C Blakeley), 60433 **Public Bodies** 56615 (Gamlingay PC), 56739 (Croydon PC), 56878 (Bassingbourn-cum-Kneesworth PC), 58407 (Linton PC), 59188 (Cambourne TC), 59824 (Dry Drayton PC), 59912 (Fen Ditton PC), (Great and Little Chishill PC) **Third Sector Organisations** 56857 (Save Honey Hill Group), 57016 (The Wildlife Trust), 57365 (Huntingdonshire DC), 57768 (Carbon Neutral Cambridge), 58474 (ARU), 58498 (University of Cambridge) , 58610 (Cambridge Past, Present & Future), 58913 (National Trust), 59016 (RSPB Cambs/Beds/Herts Area), **Developers, Housebuilders and Landowners** 58434 (Marshall Group Properties), 58557 (Croudace Homes), 58594 (Endurance Estates- Caxton Gibbet Site), 58749

Summary of issues raised in comments	Comments highlighting this issue
	(Trumpington Meadows Land Company a joint venture between Grosvenor Britain & Ireland and Universities Superannuation Scheme), 58886 (bpha),
Would suggest for the policy should state that all new dwellings should have a space heating demand of less than 20 kWh per meter squared per year than the current proposal of 15-20 kWh.	57768 (Carbon Neutral Cambridge)
We support clear and evidenced based requirements but request that policy provide some flexibility to include for site-specific circumstances and changing standards, legislation and technology. Policy should also recognise the importance of a fabric first approach.	58199 (Countryside Properties)
All homes must be Passivhaus standard. Additional costs of meeting this should not be considered standalone (e.g. incremental costs required to increase electricity generation should be considered). In winter it's unlikely electricity requirements can be met on-site, so off-shore wind, nuclear and other means will be required. The cost of this additional generation and distribution infrastructure must be factored in when considering the cost-benefit of a building's insulation requirements.	58122 (P Bearpark)
Mandate solar panels and EV charge points for all new housing and commercial developments.	57823 (D Lister), 58305 (I Butnar)
Should specify space to accommodate energy storage	58305 (I Butnar)

Summary of issues raised in comments	Comments highlighting this issue
Is there scope for district heating/cooling instead of individual homes or buildings?	58305 (I Butnar)
Plan does not pay sufficient attention to embedded (embodied) carbon emissions. Requirement to 'demonstrate actions to reduce lifecycle carbon emissions) is not strong enough. Need to stipulate how much emissions should be reduce by and over what timescale/clearer targets.	56675 (C Preston), 56887 (J Prince),
Inadequate attention given to restoring old buildings rather than building new.	56675 (C Preston), 56878 (Bassingbourn-cum-Kneesworth PC), 58174 (H Brown)
Policy should also include carbon emissions associated with the decontamination and demolition of existing buildings on the site such as the current CWWTP. Should also include eventual demolition of the new building. Should include the carbon expenditure of HCVs used to transport demolition waste and transfer tunnels. All needs to be factored into carbon cost of fulfilling S/NEC policy	56857 (Save Honey Hill Group), 57522 (C Martin), 57613 (J Pratt), 57671 (J Conroy), 58067 (Horningsea PC)
Could the last resort offsetting option be somehow more onerous financially?	56878 (Bassingbourn-cum-Kneesworth PC)
Operational emissions are too lax – may be exploited to evade the net zero requirement. Future-proofing is not enough – emissions must be reduced over the next few years to have the necessary impact.	56887 (J Prince),
All new public buildings must already be 'nearly zero energy buildings' which has led to an increase in costs. County Council's preferred approach is a combination of different mechanisms to achieve at least 6 BREEAM Ene01 credits and an EPC rating of A	56945 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
or better and/or installing on-site renewable energy to meet a significant proportion (>80%) of buildings expected energy use. Policy CC/NZ is less flexible and will incur additional costs. We request that it is made clear that there will be an expectation on developers to meet such costs through S106 agreements.	
Support should be expressed for developments below 150 dwellings that voluntarily provide information on whole life carbon emissions	57091 (C King), 57295 (C S Nutt),
Re: reference point 9, this should be in effect for all new housing developments to avoid unwanted preference for housing developments of between 100-150 houses. Policy should be stricter.	58158 (H Thomas)
Note reference to 'methodology to accurately predict a building's actual energy performance' and a 'nationally recognised Whole Life Carbon Assessment'. Hope that these will be sufficiently developed by the initiation of the plan and that there will be defined ways of ensuring that developers comply with the requirements.	57588 (R Pargeter)
Current wording related to operational emissions is considered too technical and not clear and will be difficult to work in practice. Contrary to para 16(d) of the NPPF	57168 (Southern and Regional Developments Ltd), 57239 (European Property Ventures Cambridgeshire),
Incorporation of extra features into new developments could boost acceptance amongst developers and improve market demand, boosting viability for application across Huntingdonshire.	57365 (HDC)
Object to policy – should be left for Building Regulations and the Future Homes Standard, a standardised approach which will be more effective of achieving net zero by 2050. Even if local plans	57381 (Persimmon)

Summary of issues raised in comments	Comments highlighting this issue
can set policy requirements for carbon reduction, this can only be up to Level 4 of the Code for Sustainable Homes.	
How will the policy be assessed via the planning application process and what consultee would be involved in assessing compliance.	57381 (Persimmon)
With regards to Part C of the policy site specific deliverables need to be accounted for – this may not be achievable. There is also no acknowledgement of decarbonisation of the grid. It should be ensured that Part D of the policy is achievable to obtain the requirements of Part C on all sites prior to offsetting.	57381 (Persimmon)
Further clarification is needed on requirements of Whole Life Carbon Assessments. Any resulting recommendations should be included in viability.	57381 (Persimmon)
Welcome ambitions to deliver net zero carbon buildings. We have published a new Output Specification (OS21) for schools which is broadly aligned. Request flexibility on assessment methodologies to be used to demonstrate whole life carbon and energy performance gap and recommend flexibility on application (over-provision in some areas to offset under provision in other areas but demonstrate overall compliance).	57481 (ESFA - Department for Education)
Unclear whether policy will require whole-life net zero carbon or only consideration/calculation of embodied carbon.	57481 (ESFA Department for Education)
Seems unlikely that developments can generate enough renewable energy to meet their needs at the required standards. At a conservative average of 50m^2 per home, 49,000 homes using 35 kWh/yr would need 85 gigawatt hours per year of new generation	57986 (Cambridge Doughnut Economics Group)

Summary of issues raised in comments	Comments highlighting this issue
paid for within the homes price – far beyond developers construction capabilities. If via pv this too seems unlikely – average 50m^2 home would need 1750 kWh/year requiring 17m^2 of panels which is all of the south facing roof capacity for every single house. Is there confidence that developers can achieve this or is it expected that every development would need offsetting measures. What absolute standard would be applied for offsetting or what are the futureproofing approaches?	
Some elements of the policy are supported, including: • All heating being provided through low carbon fuels (not fossil fuels), and no new developments should be connected to the gas grid, are supported. However, it is important to note that: • the requirements are demonstrably deliverable in the context of new development In Greater Cambridge. • An ambition for proposals to generate at least the same amount of renewable energy (preferably on-plot) as they demand over the course of a year is understood but also needs to be demonstrably deliverable in the context of new development In Greater Cambridge.	58942 (St John's College Cambridge)
Support the policy direction, but :	58975 (Metro Property Unit Trust)

Summary of issues raised in comments	Comments highlighting this issue
• The policy direction should apply to the delivery of new floorspace only. • The policy should also allow for viability considerations, as not all developments will be able to meet other requirements and obligations required by the emerging Greater Cambridge Local Plan.	
Concerned the Planning Authority cannot guarantee this and would welcome comment on how this will be enforced.	59093 (Great Shelford PC)
Expect every new building to be built to net zero standards, for example with solar panels and either ground or air source heat pumps. Not just built to the minimum planning standards of the day (currently 10% renewable). With such a major project, we should be aiming for 22nd century building standards, not early 21st century needs.	59093 (Great Shelford PC)
Concern that there is no reference to consideration of existing buildings (which may be demolished) to be replaced by new buildings, should this not be in the policy consideration?	58714 (H Brown)
It is though considered that requirements such as these are best set at a national level, with consistent methodologies (and expertise).	58474 (ARU)

Summary of issues raised in comments	Comments highlighting this issue
Any policy also needs to differentiate between new buildings and refurbished buildings, recognising the difficulty in refurbishments meeting the same standards as new buildings.	58474 (ARU)
The policy needs to clarify that m2 refers to GIA and clarify that Total Energy Use Intensity (EUI) targets exclude renewable energy contribution. Higher education teaching facilities EUI targets also need amending and disaggregating as follows: a. General HE teaching space – 65 kWh per m2 per year b. HE science/lab/medical teaching/research space – 150 kWh per m2 per year c. HE office space – 55 kWh per m2 per year	58474 (ARU)
The University supports the overall approach given its own science-based target to deliver a zero carbon estate, but we note that in some cases the proposed standards are so tight that they require a more nuanced approach with slight relaxations where there is a reasonable justification. A summary of the key issues raised is included below: • **A space heating demand of 15-20 kwh/m2/p.a for domestic and non-domestic buildings** This is very close to Passivhaus Standard. This in effect mandates triple glazing, mechanical ventilation with heat recovery, and the highest standards of insulation and air-tightness. We recommend allowing a relaxation where site	58498 (University of Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
constraints mean solar access is poor or an optimal form factor cannot be achieved. • **Total energy use intensity (EUI) of 35 kwh/m2 for residential** This EUI goes beyond the exemplary 'Passivhaus' standard. We ask that an illustrative energy budget based on a real example be provided to show how this is achievable in practice. We recommend allowing a relaxation where site constraints mean solar access is poor or an optimal form factor cannot be achieved. Use of EUI could unfairly penalise smaller dwellings. For example, someone using a fridge and a cooker in a dwelling of 50m2 uses double the kWh/m2 for those appliances as the same person in a dwelling of 100m2; there is no design solution for that. We recommend a space efficiency factor be applied. • **150kwh/m2 for research space** Actual EUI will be highly variable depending on the nature of the research. The University's Civil Engineering Building was predicted to consume 80kWh/m2/yr and is achieving 77kWh/m2/yr. The Heart & Lung Research Institute, however, is predicted at 245kwh/m2/yr as it will have to provide high rates of ventilation and contains energy intensive equipment.	

Summary of issues raised in comments	Comments highlighting this issue
We suggest ‘process energy’ such as autoclaves, ultra-low temperature equipment, fume extraction etc. fall outside the research space EUI standard. Efficiency relating to this type of non-standard consumption can be demonstrated through the BREEAM ENE07 credit for ‘Energy efficient laboratory systems’. • **100% renewable energy provision, preferably on-plot** Efficient PV could deliver 120kWh/yr per m2 of panel. In effect, this means roof mounted PV will struggle to meet demand where two storeys each have an EUI of 55kWh/m2/yr, even if 100% of the roof is covered in PV and there is no shadowing. This means significant renewable energy will have to be sourced elsewhere on-site or off-site for buildings above two storeys. This policy proposal implies any non-domestic building of more than one storey will require 100% of the roof to be covered in PV (unless we see significant increases in PV efficiencies). We recommend that clarification be given that this policy should not be at the expense of equally environmentally beneficial proposals such as roof mounted air source heat pumps, roof level amenity space, and ‘green roofs’.	

Summary of issues raised in comments	Comments highlighting this issue
Policy should clarify that where peak PV output is likely to exceed building demand, and the local Distribution System Operator has insufficient capacity to receive the excess, then the offsetting route will be acceptable. As grid carbon factor drops, it is possible that the carbon emitted to manufacture and install a PV array and associated infrastructure will exceed the lifetime carbon savings. This should be recognised in Policy for future proofing. • **Offsetting only to be used in specific circumstances (e.g. insufficient roof space) with such buildings future proofed to enable 100 zero carbon through upgrades** Policy should clarify the accountancy requirements for this policy. For example that a Power Purchase Agreement for 100% renewable electricity will be accepted. Also, that if the applicant makes an advance investment in offsite renewable energy, this will be regarded as an offset 'bank' for future construction projects. • **General Comments** • Confirmation is sought as to whether the proposed policy would apply to major refurbishment as well as new build • The proposed Energy Use Intensity figures are defined in kWh/m2. Confirmation is sought as to whether m2 is defined as gross internal floor area, and is kWh is defined as metered energy.	

Summary of issues raised in comments	Comments highlighting this issue
• An exception to EUI standards should be allowable where building usage will be exceptionally efficient in use of space e.g., hot desking to maximise occupancy, or extended opening hours. • A definition of how EUI will be predicted is sought – in practice will the 'most likely' scenario in the range of outcomes defined in a CIBSE 'TM54' Operational Energy Evaluation carried out by a competent professional be accepted? • EUI does not consider the desirability of storage to relieve pressure on the grid, minimising need to switch on high carbon electricity generators. Storage in the form of batteries, thermal stores and inter-seasonal storage in the ground should be encouraged. Confirmation is sought that higher EUIs associated with energy storage will be accepted where this brings a net saving in grid carbon. • Welcome the requirement to measure embodied carbon for large projects as this is in line with existing University Design Standards. We note there is a big disparity between the threshold sizes for non-residential and residential development and suggest these be treated more equally.	
Support policy, but it should also:	58610 (Cambridge Past, Present & Future)

Summary of issues raised in comments	Comments highlighting this issue
• Reference that the targets prioritise a fabric first approach which involves maximising the performance of the construction components and materials making up the building fabric before the use of mechanical and electrical building systems. • We support a policy direction which recognises embodied carbon. However, it is noted that embodied carbon is not included in all of the findings of the evidence base (Net zero carbon study (2021)). This undermines the claims made about the sustainability of new development and raises questions about the claimed sustainability credentials of the preferred growth option.	
Setting appropriate levels of energy use that will be allowed for in new development should be the remit of Building Regulations and not the Planning system.	58671 (Vistry Group and RH Topham & Sons Ltd)
In accordance with paragraph 16 of the NPPF, Plans need to be aspirational but also deliverable. The emissions targets as set out within the policy are extremely ambitious, aiming for London Energy Transformation Initiative ("LETI") targets. The Council should ensure that the use of such targets outside of London is evidenced and achievable.	58700 (The Church Commissioners for England) 58942 (St John's College Cambridge) 59542 (Countryside Properties-Bourn Airfield) 59948 (Taylor Wimpey), 60601 (Countryside Properties – Fen Ditton site), 60603 (Countryside Properties – Fen Ditton site) 59544 (Countryside Properties – Bourn Airfield),
We note in Viability Assessment that a "net zero carbon cost has been explicitly included in the appraisals" and this is welcomed. It is	58732 (Wates Development), 58734 (Wates Development Ltd)

Summary of issues raised in comments	Comments highlighting this issue
noted that the cost for installation of heat pumps, mechanical vetialation and PV can vary amongst different dwellings. Unclear whether in all instances installation of a heat pump, mechanical ventilation with heat recovery (MVHR) and photovoltaics will be sufficient to demonstrate a net zero carbon cost as this will vary from development to development, and therefore whether sufficient cost.	
Shepreth Parish Council (SPC) notes that transport carbon is more of a problem than building carbon.	59478 (Shepreth PC)
The latest construction technologies should be enshrined in planning and building regulation.	59478 (Shepreth PC)
Viability Study includes cost figures greater than 7 years out of date. Recommend figures are updated (rather than being index linked) to ensure evidence is robust and meets tests of soundness. Concerned whether 2% uplift represents a sufficient increase in build costs. Whilst clearly desirable to achieve highest possible water efficiency, Building Regulations is 125 litres/person/day. NPPG 56-014-20150327 states where a clear local need, policies can require a	58741 (Wates Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
tighter optional requirement of 110 litres/person/day. Blanket 80 litres/person/day target not considered realistic. Instead, 110 litres/person/day should be encouraged. May be appropriate to set tighter standards for certain site allocations. Overall, Assessment recommends growth be concentrated in new settlements or urban extensions that avoid high flood risk and have high standards for design of flood risk management, water usage and re-use, and blue-green infrastructure. Follows a Location Opportunities and Constraints Categorisation and Scoring which assesses and scores each proposed growth strategies. Disputed why development within the Minor Rural Centres and Group Villages have been disregarded as an appropriate growth strategy if they are able to meet ambitious water usage targets and implement water recycling systems.	
Technology will move faster than the Local Plan process so any policy should avoid being too prescriptive in relation to specific technology types.	58886 (bpha), 60222 (Thakeham Homes Ltd) 60551 (Thakeham Homes Ltd) 60242 (Federation of Cambridge Residents' Associations)

Summary of issues raised in comments	Comments highlighting this issue
Regular reviews should be carried out to ensure policies are updated.	
Clarity should be given on the requirements of Whole Carbon Assessments and what they should contain.	58886 (bpha)
Draft policy CC/NZ sets a high threshold of 150 homes for calculating whole life carbon emissions. Support should also be expressed for developments of <150 dwellings where this information is provided voluntarily.	59137 (Endurance Estates), 60286 (Wheatley Group Developments Ltd), 60337 (F.C. Butler Trust), 60348 (F.C. Butler Trust), 60363 (H.J. Molton Settlement), 60376 (Stephen & Jane Graves), 60386 (D Wright), 60474 (Peter, Jean & Michael Crow)
What support will be available for developers in seeking to meet the high standards proposed? Will the potential impact on viability be taken into consideration? Regardless of the chosen approach, it would be useful to include further guidance/information in a supplementary planning document (SPD).	59137 (Endurance Estates) 60286 (Wheatley Group Developments Ltd), 60337 (F.C. Butler Trust), 60348 (F.C. Butler Trust), 60363 (F.C. Butler Trust), 60376 (Stephen & Jane Graves) 60386 (D Wright) 60474 (Peter, Jean & Michael Crow) 57091 (C King), 57295 (C S Nutt),
Concerned that the policies as they stand are unsound as they propose to introduce some of the highest sustainability requirements in the country without a complete evidence base. It may reduce the delivery of affordable and private housing within the Greater Cambridge (GC) area. Criticisms include: • The Topic Paper (page 17) states that the standards proposed are not as onerous as the passivhaus standard	59542 (Countryside Properties- Bourn Airfield) 59948 (Taylor Wimpey), 60601 (Countryside Properties – Fen Ditton site), 60603 (Countryside Properties – Fen Ditton site) 59544 (Countryside Properties – Bourn Airfield),

Summary of issues raised in comments	Comments highlighting this issue
but do go beyond the proposed FHS. The passivhaus standard requires an EUI of less than 120 kWh m2 per annum compared to the policy target of 35KWh per m2- thereby suggesting that the draft policy target is in fact considerably more onerous than passivhaus. This carries a significant cost premium. • The passivhaus standard requires a space heating demand of 15 kWh m2 per annum compared to a draft policy target of 15 – 20 kWh m2 thereby suggesting close alignment between the two on this specific issue. • Draft Policy CC/NZ requires applicants to address both regulated and unregulated energy as opposed to the FHS which deals with regulated energy alone. The Government have made this important differentiation because the use of unregulated energy (e.g. power used by televisions and appliances) is the responsibility of the homeowner and not the housebuilder and is extremely difficult to quantify accurately at construction stage. • To hit the EUI target of 35KWh per m2 the Evidence base document estimates that the following will be required although no exact details are available: (a) Low U-values that exceed the requirements of the proposed FHS (b) Mechanical Ventilation with Heat Recovery (MVHR) to recover waste heat from the dwellings (c) A high level of air-tightness to prevent cold air ingress and heat loss from the dwelling	

Summary of issues raised in comments	Comments highlighting this issue
All of these identified measures are characteristic of implementing the passivhaus standard • The cost of implementing Policy CC/ NZ has been estimated at between 10% and 13% above that required to build to current Building Regulations. No detailed analysis of the assumptions behind this calculation were available however. It is claimed that this cost is achievable on the basis that significant costs are required to implement the FHS and therefore the costs identified by the Evidence base are an over-estimate and are therefore acceptable. Countryside believe it is extremely important to obtain the detailed evidence behind these costs as in our experience the cost of building to passivhaus standards (or extremely close) is likely to be significantly higher than those quoted in the Evidence base paper. Given the above it would appear that the Policy CC/ NZ is implementing on-site energy efficiency standards much more closely aligned to passivhaus which presents significant challenges to the housebuilding industry, for the following reasons: • Building to passivhaus requires a complete transformation of the on-site construction process and supply chain which	

Summary of issues raised in comments	Comments highlighting this issue
would significantly delay housing delivery and increase costs of new dwellings particularly for the small and medium sized house builders. • The cost of constructing houses to passivhaus is likely to be significantly higher than that identified in the evidence base although a direct comparison is difficult in the absence of the detail behind the assumptions in the Evidence Base. Achieving air-tightness levels close to passivhaus and installing MVHR are extremely costly forms of construction.	
Other reservations about the policy, include: • It is unreasonable to prohibit all new developments to connect to the gas grid as it is possible that for buildings such as care homes and health facilities gas may still be the most suitable fuel for heating given the bespoke heating requirement of these health facilities. Given that some of Countryside's sites are large enough (such as Bourn Airfield) to permit the delivery of critical social infrastructure such as schools and health facilities, there may be a technical requirement for gas in some form to our large sites. • The requirement for new dwellings to generate at least the same amount of renewable energy as they demand over the course of the year is extremely challenging given that it must include both regulated and unregulated energy for which it is	59542 (Countryside Properties- Bourn Airfield) 59948 (Taylor Wimpey), 60601 (Countryside Properties – Fen Ditton site), 60603 (Countryside Properties – Fen Ditton site) 59544 (Countryside Properties – Bourn Airfield),

Summary of issues raised in comments	Comments highlighting this issue
difficult to estimate the exact quantum of energy needed given it is entirely dependent on the occupiers use of appliances. • The offsetting policy (although lacking in detail) would appear to be based on the cost of providing additional PV cells to generate the quantum of energy that remains from the development site after all on-site measures have been deployed. At this time however there appears to be no data with respect to the cost of this offsetting policy and how any money will be spent with absolute certainty to ensure 'additionality'. Without any costs or viability information this aspect of the policy fails the test of soundness. • The offsetting policy will add a significant (albeit unknown at this time) cost to new housing which ultimately will feed into higher house prices and greater affordability challenges. We look forward to seeing the detail of this policy but would urge the authorities to fully explore the viability of this carbon offsetting and its impact upon the delivery of affordable housing before it is adopted. • The requirement to calculate Whole Life Carbon (WLF) in construction would increase the importance of reducing embodied carbon within the supply chain, particularly for small and medium sized developers. For Countryside however, we are already committed to reducing our embodied (scope 3 emissions) within the supply chain have set ambitious targets to reduce these over time. The	

Summary of issues raised in comments	Comments highlighting this issue
requirement to submit a WLC assessment for each application places an unnecessary burden upon our new development activities as this work is already part of our corporate commitments. To ensure this policy does not negatively affect housing delivery we would request that the acceptable evidence to demonstrate policy compliance could be details of our corporate commitment and progress to date.	
Recommend the following amendments : • Utilise the FHS as the main metric for the construction of energy efficient housing. The use of this standard will also provide greater support to the small and medium (including self-build) housing sector which we believe is critical to ensure greater supply and diversity of affordable housing to the consumer. Detailed performance of FHS is unknown at the moment, but the Government have confirmed that dwellings built to this standard will reduce carbon emissions by 75% compared to those built under the current 2013 Building Regulation. • Publication of a complete and full evidence base for stakeholder comments before these draft policies are developed further.	59542 (Countryside Properties- Bourn Airfield) 59948 (Taylor Wimpey), 60601 (Countryside Properties – Fen Ditton site), 60603 (Countryside Properties – Fen Ditton site) 59544 (Countryside Properties – Bourn Airfield),

Summary of issues raised in comments	Comments highlighting this issue
For draft Policy CC/NZ, a more detailed review of the full evidence is not possible as only the non-technical summary has been published and therefore Countryside reserve the right to amend our representations once this material has been reviewed.	59544 (Countryside Properties – Bourn Airfield), 60601 (Countryside Properties – Fen Ditton site)
To be effective it needs to be taken in conjunction with three further policies which we have not discovered in the draft Local Plan, namely: • a 'brownfield first' policy for new building • a policy to minimise the number of new buildings and developments in the Greater Cambridge region • a policy to halt the use of scarce farmland for solar energy generation and instead ensure that solar installations are mandated on all industrial buildings, new and existing. Policy is totally ineffective in this respect.	59573 (Campaign to Protect Rural England) 59912 (Fen Ditton)
Planners to encourage & preferably enforce carbon neutral/eco-friendly developments.	59824 (Dry Drayton PC)
Reuse of existing buildings should be emphasised over new build.	59912 (Fen Ditton), 60193 (J Preston)

Summary of issues raised in comments	Comments highlighting this issue
Objections to policy include: • The Policies as written are aspirational rather than achievable. • The cost, cost sharing and carbon footprint of district heating/cooling needs to be investigated and a comparison made of air source and ground source HPs. It is insufficient to treat each building in isolation. • The role of the grid to supply part of the demand must be described since this has access to low cost and carbon sources as well as providing resilience. • The role of hot water storage should be described since this avoids use of power in short duration peak periods. • Does the Plan envisage “smart” demands that avoid short duration peaks in the system?	59912 (Fen Ditton)
According to the recent Cambridge and Peterborough Climate Commission report, at the present rate the Region will have used up all of its carbon budget, allocated to meet its legal obligation to reach zero carbon by 2050, in less than six years; due to the level of planned growth, emissions will accelerate further. The obvious conclusion is that all unsustainable growth has to be curbed. Imported emissions arising from construction (the UK imports most of its building materials, even the bricks are made in Belgium or Holland), must be reduced if the UK is to meet its now legal	59946 (O Harwood)

Summary of issues raised in comments	Comments highlighting this issue
emission targets. The intensification of housing in Cambridge should use sustainable building techniques based around wood and recycled materials.	
Should not be specific about not connecting a gas pipe to new housing. This might prevent the future distribution of Hydrogen. Should keep this option open.	59999 (Steeple Morden PC)
I have concerns about how for example heat pump technology can be installed and used at reasonable cost in new development.	60122 (C Blakeley)
The definition of a Net Zero Carbon building set out in the Evidence Base does not include its embodied carbon: this is a very serious omission. Support recognition of embodied carbon, also whole life carbon (see CC/CE).	60193 (J Preston) 60242 (Federation of Cambridge Residents' Associations) 60746 (Cambridge and South Cambridgeshire Green Parties)
Require whole-life assessments whenever demolition of an existing building is proposed.	60193 (J Preston), 60746 (Cambridge and South Cambridgeshire Green Parties)
In relation to parts A and B, we recognise the need to move towards greater energy efficiency but this should be done via a nationally consistent set of standards and timetable e.g. Future Homes Standard which is universally understood and technically implementable.	60168 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
The Government have confirmed that local authorities are able to set policy requirements related to carbon reduction in their local plans. However, paragraph 6-012 of PPG states that for new housing this can only be up to the equivalent of level 4 of the Code for Sustainable Homes. This is roughly the equivalent to a 20% improvement on the 2013 Building Regulations and will soon be superseded by the proposed changes to building regulations. A policy proposing its own standards is not consistent with national policy. Councils should comply with the Government's intention of setting standards for energy efficiency through Building Regulations and not set its own standards as part of the local plan. the Councils proposed approach to energy use and efficiency in policy CC/NZ will only cause confusion in its implementation and enforcement with seemingly little additional improvement in energy efficiency. By requiring additional standards, the Council will require additional assessments to be applied in parallel to building regulations creating confusion and adding costs.	60168 (Home Builders Federation)
In relation to part C - in some cases it may not be possible to meet the required standard due to site-specific viability and deliverability issues, and this should be recognised in the policy. The policy also makes no allowance for the decarbonisation of the national grid. Such improvements will need to be considered within any	60168 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
assessment of energy use and the level of onsite renewable energy that is required to be generated.	
In relation to part D - development should deliver the energy efficiency improvement required by building regulations and where feasible and viable meet some its energy demand through onsite renewable energy generation. Further offsetting should not be required.	60168 (Home Builders Federation)
There are serious quality control challenges in relation to whether aspirational aims are actually delivered. Outline planning permissions must be subject to the aspirations articulated in the Draft Local Plan.	60242 (Federation of Cambridge Residents' Associations)
Gladman are supportive of attempts to reduce carbon, however new buildings and residential developments will be built in accordance with the Building Regulations at the time of their construction.	60313 (Gladman Developments)
Residential developments of 150 homes or more and non-residential development of 1,000 m2 or more should calculate whole life carbon emissions through a nationally recognised Whole Life Carbon Assessment and demonstrate actions to reduce life-	60313 (Gladman Developments)

Summary of issues raised in comments	Comments highlighting this issue
cycle carbon emissions. This should include reducing emissions associated with construction plant.	
In Greater Cambridgeshire there are a considerable number of rural communities reliant on oil. They have ageing power networks without the capacity to install heat pumps or car charging points. There is a risk that these communities will be further left behind. The local plan has identified the need for “smart” power networks with greater capacity for new developments. As part of these new developments, section 106 agreements must be negotiated to help rural residents also install renewables. There are many rooves in these areas that would benefit from solar PV with batteries plugged into this “smart” network	60489 (Grantchester PC)
Policy direction needs to be strengthening. Recommendations include: • applying more rigorous standards, concerns over delivery. • Welcome policy applying to minor developments and temporary buildings. basis. • Use of sustainable materials. Reuse and recycling of materials should be favoured. The use of timber from sustainably managed (ideally UK) woodland should be promoted. Lime mortar should be used instead of cement	60746 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
wherever possible. Finally, buildings should be designed for longevity. • Offsetting: welcome the conditions set out under 'Part D' (page 146) that limit the use of offsetting. It is important that offsetting is genuinely a last resort and is not used by developers to avoid meeting net zero requirements on-site. The carbon accounting for any offsetting schemes applied must be rigorous and transparent.	

Table of site-specific comments posted under 'CC/NZ: Net Zero carbon new buildings'

Note: the sites are highlighted in yellow

Summary of issues raised in comments	Comments highlighting this issue
Carbon expenditure, emissions, and embedded carbon to decommission a fully operational waste water treatment plant and decontaminate site and build new plant within 1 mile of existing inclusive of transfer tunnels, HGV traffic etc., should be factored into carbon cost of fulfilling Policy S/NEC	58067 (Horningsea Parish Council)
We have committed to being a net zero company by 2030 and have released a Pathfinder report and action plan that would be applied to Land to the west of Cambridge Road, Melbourn.	58199 (Countryside Properties)

Summary of issues raised in comments	Comments highlighting this issue
Marshall supports the net zero requirement of the Local Plan, which aligns with the ambitions at Cambridge East. The aspirations look to achieve net zero operational carbon and embodied carbon. Any remaining carbon will be offset at a site, local, and regional scale. Marshall also welcome the prospect of developing a more detailed approach to the use of materials with low embodied carbon, and to the achievement of a circular economy. Whilst carbon reduction is an intrinsic aspect of Cambridge East, we welcome more specific emerging policies so that we can work with the authorities to test our vision.	58434 (Marshall Group Properties)
Croudace Homes support such initiatives. They are already developing to the standard of New Homes and fully intended to deliver housing at Fowlmere, were it to come forward, to the highest building and sustainability standards. These and the other environmental policies demonstrate that development should not be promoted based on transport links alone, but rather wider regard has to be had to the scope of the site for development of the highest sustainability standards in terms of energy consumption, access to renewable and sensitivity to, and ability to work with, the immediate environment.	58557 (Croudace Homes)
The promoted development Caxton Gibbet, will be net zero carbon in operation, taking a holistic approach that implements energy efficient buildings alongside a dedicated solar farm and solar PV on roofs. Given the fast pace of technological advancement and evolution, the development will assess the available options at the time of construction to be able to deliver a sustainable, viable, project.	58594 (Endurance Estates- Caxton Gibbet Site)
The full carbon cost of the NEC site is not described. Claiming the NEC is the most sustainable brownfield site is disingenuous because it isn't a brownfield site - it has a recently upgraded, fully operational sewage	59202 (C Martin)

Summary of issues raised in comments	Comments highlighting this issue
plant on the site, and a range of industrial/commercial businesses. The area is being turned into a brownfield site by destroying the plant and moving the businesses. The carbon cost of destroying the plant, decontaminating, digging new tunnelling and constructing a new plant, less than a mile away is extremely carbon intensive and wasteful.	
Utilising recycling systems, Assessment suggests large sites are able to successfully use recycling to reduce demand for potable water. Disagree. New development (regardless of scale) is able to adopt rainwater recycling systems. Land to East Side of Cambridge Road, Melbourn, can adopt rainwater recycling system if required. Assessment also identifies potential for introducing flood management and SuDS schemes to deliver multifunctional benefits including biodiversity enhancements. Land to East Side of Cambridge Road, Melbourn can deliver.	58741 (Wates Developments Ltd)
Consideration will need to be given to whether the CWWTPR would be subject to Policy CC/NZ which governs the energy intensity of new commercial buildings. The project will set out in the application the full carbon benefits of the relocation from freeing up a low carbon location for homes, through minimising embedded carbon in construction to being net zero (or better) in operation. This will then align with the emerging carbon and climate change policy in the current draft suite of Energy NPS which is likely to be mirrored in the update to the Wastewater NPS.	(60459) Anglian Water Services Ltd
To meet these policy objectives, North Cambourne MGH will use the energy hierarchy, reducing demand for heating through efficient design and adopting measures consistent with those in the Future Homes Standard consultation. Site will not be connected to the gas grid, employing all-electric systems and considering opportunities to use waste heat and to share heat between domestic and non-domestic uses. We would look to maximise	57896 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
renewable energy generation through onsite means aiming to achieve net zero emissions without offsetting where possible. Carbon offsetting would only be used as a last resort. Whole life carbon assessment would also be undertaken in line with current RUCS best practice guidance.	
The council should adopt FHS rather than the policy's high standards, because there would a consistent, deliverable standard for all new dwellings in Greater Cambridge thereby providing a level playing field for all housing developers. For Bourn Airfield this would provide opportunities for smaller housebuilders and self-build to deploy the same high standard even if this was for a limited number of plots.	59544 (Countryside Properties – Bourn Airfield)
We support clear and evidenced based requirements but request that policy provide some flexibility to include for site-specific circumstances and changing standards, legislation and technology. Policy should also recognise the importance of a fabric first approach. We have committed to being a net zero company by 2030 and have released a Pathfinder report and action plan that would be applied to Land to the west of Cambridge Road, Melbourn.	58199 (Countryside Properties)

CC/WE: Water efficiency in new developments

Hyperlink for comments

Open this hyperlink- Policy CC/WE: Water efficiency in new developments > then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

Number of representations for this policy: 68

Executive Summary

There was strong support for the policy direction from a range of public bodies and individuals. Many representations expressed concern about the level of water stress in the area and damage to chalk streams, and stated that there should be a limit on growth if there is insufficient water or until further water supply is available. The Environment Agency and Natural England identified that the Water Cycle Strategy will need to demonstrate how water to meet growth needs will be supplied sustainably. Other comments related to the collaborative working that will be needed and that there will be more detail about this future supply in the Water Resources Management Plans being produced by the water companies.

There was support for the proposal to require high water efficiency standards, noting the potential of rainwater harvesting and greywater recycling to achieve these. However, there were also representations from developers saying that 80 litres per person per day is unrealistic and would have an impact on the viability of developments, and that the Building Regulations level of 110 litres should be used. Some representations from developers and landowners highlighted some of the potential problems with rainwater harvesting and greywater recycling such as maintenance issues, where there is limited roof collection (such as flats) and that rainwater is limited in this part of the country. There were some suggestions on the policy wording. For example, whether the standard would apply to all sizes of developments, if BREEAM is the right tool to use for non-housing developments and is the term "unless demonstrated impracticable" too weak, giving developers a let-out. The Environment Agency stated that to ensure the policy is effective, further guidance would be needed regarding the evidence applicants would be expected to submit to demonstrate that this standard has been achieved and how this would be monitored.

Table of representations for Policy CC/WE: Water efficiency in new developments

Summary of issues raised in comments	Comments highlighting this issue
Support the policy	**Individuals** 57953 (L Buchholz), 58308 (I Butnar), 59309 (M Berkson) **Public Bodies** 56616 (Gamlingay PC), 57366 (Huntingdonshire DC), 58408 (Linton PC), 59722 (Environment Agency), 59973 (Natural England), 60453 (Anglian Water Services Ltd), 59190 (Cambourne TC), 60001 (Steeple Morden PC), 60123 (C Blakeley), 60434 (Great and Little Chishill PC) **Third Sector Organisations** 56974 (Trumpington Residents Association), 57018 (The Wildlife Trust), 57770 (Carbon Neutral Cambridge), 58617 (Cambridge Past, Present & Future), 58918 (National Trust), 59018 (RSPB Cambs/Beds/Herts Area), 60747 (Cambridge and South Cambridgeshire Green Parties) 60173 (Cam Valley Forum) **Developers, Housebuilders and Landowners** 58203 (Countryside Properties UK Ltd),58752 (Trumpington Meadows Land Company 'TMLC' a joint venture between

Summary of issues raised in comments	Comments highlighting this issue
	Grosvenor Britain & Ireland and Universities Superannuation Scheme)
Important issue given the water supply issues coming forward up to 2041	60123 (C Blakeley)
Include a requirement for new buildings to capture and use rainwater for non-potable purposes to reduce the need for water provision	56504 (D Clay)
New reservoirs will take some time to construct, so it is not a question of efficiency, but also supply. Is there enough water to supply so many new homes? New development should only be permitted where adequate water supply can be demonstrated	56740 (Croydon PC), 56879 (Bassingbourn-cum-Kneesworth PC)
There must be no building in areas prone to flooding	56741 (Croydon PC 2nd comment)
Page 26 makes reference to BREEAM, however is BREEAM the best tool moving forward? As it is not a requirement elsewhere in the report.	56879 (Bassingbourn-cum-Kneesworth PC)
Over-exploitation of chalk stream aquifer is a massive environmental issue; Local Plan does explain the issue, but I urge you to safeguard the habitat, including informing residents how they can pressure the government.	56888 (J Prince)
Language used, such as ‘Proposed policy direction” – “unless demonstrated impracticable” is too weak, giving developers a let-out.	56888 (J Prince)
Support policy, but question whether this is only applicable to developments of certain size due to infrastructure requirements?	56974 (Trumpington Residents Association)

Summary of issues raised in comments	Comments highlighting this issue
We made similar representations supporting this action in relation to previous Local Plans which were ignored and our chalk rivers and wetlands have continued to decline.	57018 (The Wildlife Trust)
We are concerned no mechanisms have been identified to delay or stop new development if the short-medium measures to provide more sustainable water supplies are not delivered in-time. This will be the true test of a sustainable Local Plan	57018 (The Wildlife Trust)
I have learnt that implementation of any plan to fix the water supply will not happen until the 2030s and be expensive. The existing houses are already depleting the chalk aquifer. However, you have signed off the 2018 plan which includes all but 11.5k of the new houses. How will your policies address these issues?	57040 (W Harrold)
What support will be available for developers in seeking to meet the high proposed standards? Will potential impact on viability be taken into consideration? It would be useful to include further guidance in an SPD.	57093 (C King), 57296 (Charlotte Sawyer Nutt) 59144 (Endurance Estates), 60287 (Wheatley Group Developments Ltd), 60334 (S & J Graves), 60338 (F.C. Butler Trust), 60349 (F.C. Butler Trust 2nd comment), 60362 (H.J. Molton Settlement), 60387 (D Wright), 60472 (P, J & M Crow)
Add into the policy: • Any development larger than 3 houses must create ponds. • Underground tanks should be a last resort • Full and published mapping survey must be carried out and the neighbourhood must be consulted on full-length of watercourses and discharge points to the main river points, e.g., the Cam.	57133 (North Newnham Resident Association)

Summary of issues raised in comments	Comments highlighting this issue
• Analysis of the quality of water (to measure pollutants) as well as analysis of quantity flow must be measured for a period of a year before and evidence given before permits are given to discharge water into open or culverted ditches.	
The Local Plan posits a significant increase in housing, which assumes sufficient water will be available to meet the housing's needs. However, the GCLP strategy states there is an inadequate supply. No proposals have been put forward to address this, therefore the housing strategy has no basis in reality.	57146 (Oakington & Westwick PC)
The target is too onerous. The current Building Regulations standard of 110 litres/ person/ day is more realistic. The Council's policy on water efficiency should adopt a flexible approach and encourage the use rainwater harvesting in new developments.	57169 (Southern & Regional Developments Ltd), 57241 (European Property Ventures)
Incorporation of water efficiency measures for new developments could boost the acceptance amongst developers of these approaches and improve market demand for them.	57366 (Huntingdonshire DC)
Policy requirements are significantly lower than current requirements. It would be appropriate to wait until the Water Resource Management Plan in 2022 to assess whether such extreme measures on water consumption reduction is necessary. A goal of 100-110 litres per day would be more appropriate and achievable.	57382 (Persimmon Homes East Midlands)
We would like to see the policy strengthened, so that development can only proceed where the was adequate, proven availability of	57770 (Carbon Neutral Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
water, without depleting the aquifer and without incurring the energy and carbon cost of long-distance water transfer.	
The policy only sets a water standard per home. This will limit the overall increase in water demand, but the Cambridge area is already in severe water stress. The policy should include a limit based on the absolute water stress of the Cambridge area. The criterion should be included in this part of the document to ensure that developers address the actual problem.	57897 (Cambridge Doughnut Economics Action Group)
A limit on water consumption must also be applied to commercial and industrial premises.	58036 (D Blake)
Designing for 80 litres/person/day is a good policy, but there are better gains by designing for zero people consuming zero litres per day. With global warming there is not sufficient water supply in the Cambridge area to justify increasing the population.	58059 (B Marshall)
Water supply is in our area is clearly limited and this can potentially limit the rate of house building in the area. I would support mandating new developments provide a solution to harvest rainwater and potentially allow grey water reuse.	57824 (D Lister)
It is unlikely that the 80 litres per person per day target will be achievable through low flow fittings alone. The potential to include rainwater harvesting should therefore be investigated in more detail, and rainwater harvesting systems employed at a building level or used in conjunction with the site-wide Sustainable Urban	57897 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
Drainage Systems (SuDS) features to provide a centralised rainwater collection system.	
Achieving all five BREEAM WAT01 water conservation credits is an extremely challenging standard that is likely to go beyond the limits of viability for smaller projects, projects with limited roof collection area, and projects with functions that do not fit the BREEAM standardised calculation methodology.	58501 (University of Cambridge)
There is a risk of 'white elephant' grey water recycling and rainwater harvesting systems that are too small to be sustainable in terms of operating cost. We ask that guidance on the appropriate threshold of viability be provided; ideally in the form of worked examples for different building types.	58501 (University of Cambridge)
What if 80L per person per day is impractical? More work is needed such as pushing for more grey water systems.	57807 (Histon & Impington PC)
We acknowledge there are issues with over-abstraction of Chalk aquifer that has a detrimental impact on environmental conditions.	58744 (Wates Development Ltd), 58759 (Wates Developments Ltd)
We are concerned that the Aspinal Verdi Viability Study (2021) uses cost figures greater than 7 years out of date and recommend figures are updated to ensure evidence is sound. We remain concerned, therefore, whether a 2% uplift represents a sufficient increase in build costs to allow for the delivery of CC/WE.	58744 (Wates Development Ltd), 58759 (Wates Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
80 litres/person/day target not considered realistic. Instead, 110 litres/person/day – the Building Regulations limit- should be encouraged. May be appropriate to set tighter standards for certain site allocations.	58744 (Wates Development Ltd), 58759 (Wates Developments Ltd) 58677 (Vistry Group and RH Topham & Sons Ltd)
We support the position that no proposed development can go ahead in the Local Plan until more water is found. We encourage all relevant authorities to go further and to ensure that water efficiency measures are introduced even for the existing developments to enable the aquifer to recover within a reasonable timescale.	59102 (Great Shelford PC)
The Greater Cambridge Local Plan Strategic Spatial Options Assessment (November 2020) recommends growth be concentrated in new settlements or urban extensions that avoid high flood risk and have high standards for design of flood risk management, water usage and re-use, and blue-green infrastructure. We dispute why development within the Minor Rural Centres and Group Villages have been disregarded as part of an appropriate growth strategy when these sites are able to meet ambitious water usage targets and implement water recycling systems.	58744 (Wates Development Ltd) 58759 (Wates Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Coordination with every organisation involved in the water supply is essential	59309 (M Berkson)
Notes the Stantec report and the requirement for strategic intervention on water supply, presumably a new reservoir or pipeline.	59479 (Shepreth PC)
Both rainwater harvesting and/ or greywater recycling systems introduce significant maintenance requirements (and therefore cost) for homeowners and introduce technology that has not been tested 'en-masse'. Countryside's and Taylor Wimpey's experience of trialling grey water recycling is that it is unreliable and likely to cause maintenance issues for homeowners.	59546 (Countryside Properties – Bourn Airfield) 59949 (Taylor Wimpey), 60604 (Countryside Properties)
Countryside and Taylor Wimpey believe that the GCLP should implement the Government's technical standard for water efficiency which is 110 lpppd. This would be viable, deliverable, and achievable for all new dwellings within GC. Should technology such as grey water recycling become viable during the lifetime of the plan then this could be considered as a means to improve water efficiency beyond the target of 110 lpppd.	59546 (Countryside Properties – Bourn Airfield) 59949 (Taylor Wimpey) 60604 (Countryside Properties)

Summary of issues raised in comments	Comments highlighting this issue
Countryside and Taylor Wimpey believe the only practical mechanism to achieve the 80lpppd would be using rainwater harvesting systems. This brings two problems • They are more difficult for flats given that communal harvesting tanks (which are more expensive) would be necessary. • Greater Cambridge is already one of the driest areas in the UK. Given that climate change will reduce rainfall in GC, it is unlikely that rainwater harvesting will capture sufficient rain to meet the policy target, making it ineffective.	59546 (Countryside Properties – Bourn Airfield), 59949 (Taylor Wimpey) 60604 (Countryside Properties)
Policy CC/WE: Water efficiency in new developments, is not going to solve the potable water crisis affecting Cambridgeshire, a crisis which is only likely to deepen if the report written by Stantec for the Shared Planning Service is ignored.	59576 (Campaign to Protect Rural England (CPRE)
Anglian Water's proposed solution to this problem, pumping water from North Lincolnshire, appears completely impracticable because the Environment Agency, in the same report, has also classified North Lincolnshire as an area of serious water stress.	59576 (Campaign to Protect Rural England (CPRE)
Another solution being considered by Anglian Water, according to Water Resources East, is to build two reservoirs in the Fens. However, this idea seems to completely ignore the fact of sea level	59576 (Campaign to Protect Rural England (CPRE)

Summary of issues raised in comments	Comments highlighting this issue
rise which will likely cause much, if not all, of the Fens to be flooded by sea water within decades.	
Our members questioned whether low water use targets can be met through design and construction methods alone, given that there are no restrictions on how much water people can use.	58617 (Cambridge Past, Present & Future)
No objections	59706 (Caldecote PC)
Proposed requirements for developments to provide integrated water management, including sustainable drainage systems (SuDS) where possible and for SuDS and green /brown roofs to provide multiple benefits (including biodiversity and amenity) are welcomed.	59973 (Natural England)
As noted with policy S/DS, the evidence base (IWMS Detailed WCS) will need to demonstrate how the water companies' plans can meet the needs of growth without causing unsustainable abstraction and associated deterioration. We offer our support to work on this collaboratively with the interested parties both ahead of the next consultation in 2022 and beyond.	59722 (Environment Agency),
Water neutrality should also be explored, noting the references made to water reuse and offsetting.	59722 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
Currently the policy direction has a caveat of 'unless demonstrated impracticable.' This should be explored further in the WCS so the Council has clear guidance on the circumstances where achieving this standard would be impracticable. This will help ensure planning applications can be fairly and reasonably assessed. This will also help ensure the overall goal of the policy is not weakened or undermined. Similarly this evidence needs to be drawn out for the non-residential standard. The WCS should also set out the backstop position should the standard of 80 litres/person/day be practicably unachievable.	59722 (Environment Agency)
We are concerned that the plan is currently unlikely to achieve the kinds of reductions in demand needed to keep the proposed levels of growth within sustainable levels. The WCS will need to demonstrate how water, to meet growth needs, will be supplied sustainably without adverse impact to the natural environment.	59722 (Environment Agency), 59973 (Natural England)
We support stringent water efficiency in water stressed areas. We recommend reviewing the document 'The State of the Environment: Water Resources' (2018) prepared by the Environment Agency.	59722 (Environment Agency)
Page 150 references the Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge	59722 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
Arc. We recommend this is also considered and referenced elsewhere in the plan with regards to net zero, net gain, tree cover and strategic resource infrastructure provision.	
As GCSP notes, it will need to be satisfied that this standard can be legally and practically implemented in the context of current legislation, national policy and building regulations. This affects the practical implementation of this policy. It would need to be determined the evidence/metric applicants would be expected to submit to demonstrate this standard has been achieved. It would also need to be evidenced how the policy standards would be implemented, and how this would be monitored to ensure the policy is effective.	59722 (Environment Agency)
Asks for clarity about which measurement will be used in general, i.e., is it the 80 litres 110 of 125?	59825 (Dry Drayton PC)
Recognise that water is a major issue, but the Local Plan should address this issue comprehensively	59857 (Barrington PC) 60434 (Great and Little Chishill PC)
Object because the policy needs further investigation. The cost and carbon content of reuse should not be excessive given that c.90% of all water used in buildings could otherwise be treated at a	59913 (Fen Ditton PC)

Summary of issues raised in comments	Comments highlighting this issue
WWTW and then be available to meet minimum environmental minimum flows or other demands downstream.	
The reliance on reduced demand must not act as a fig leaf cover for an increase in the use of drought orders and restricted supply at times of shortage.	59913 (Fen Ditton PC)
Cambridge City and South Cambridgeshire already have an unsustainable supply of potable water. In 2021 the Environment Agency published “Water stressed areas – final classification 2021”, included the fact that the supply areas of Cambridge Water and Anglian Water are areas of serious water stress. Appendix 3 states Cambridge Water needs to reduce abstraction by 22 megalitres per day from levels current at 1st July 2021, and Anglian Water needs to reduce abstraction by 189 megalitres per day from levels current at 1st July 2021.	59947 (O Harwood)
The Council have noted that the position regarding future supply and the necessary infrastructure to meet demands is still uncertain and that more detail will be known on publication of the next Water Resource Management Plan in 2022. Should the necessary infrastructure be provided to address the demands in this area then the Council will need to review the necessity of the 80 litre per person per day requirement.	60167 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
To achieve any ‘water neutrality’ from the current position will require substantial reductions in demand commensurate with any and every development envisaged. The track record of our resource management is so bad that we have little confidence in any major development improving things without a huge cultural change and management change to the water industry operations. This is really urgent.	60173 (Cam Valley Forum)
In our report ‘Let it Flow!’ we proposed that consumption might be regulated by the local authority. We do recognise that this would require Central Government legislation and action, but why not? Local authorities play a much stronger role in controlling water use in similarly water stressed regions. Our local water companies currently propose little more than ‘targeted communication’ to encourage voluntary reductions in water use during prolonged dry weather. Local authorities should join us in pressing for mandatory restrictions on consumptive uses every summer, with such restrictions being rapidly tightened and widened if ‘dry weather’ turns into ‘drought’.	60173 (Cam Valley Forum)
Welcome target for water efficiency, want further detail on how target will be enforced and monitored.	60747 (Cambridge and South Cambridgeshire Green Parties)
Although it is stated that water supply is not within the remit, the importance of “making full use of water re-use measures on site	60747 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
including rainwater harvesting and grey water recycling" is acknowledged. We would like to see details of how this will be achieved. Ideally we feel that rainwater harvesting and grey water use in new developments should be mandatory and designed in from the start.	
We are not clear to what extent wastewater management falls within the remit of the Local Plan. However, sewage management is a critical element of sustainability for new developments and we would like to see more information on this, or signposting to where such information exists.	60747 (Cambridge and South Cambridgeshire Green Parties)
Anglian Water asks that further evidence is developed with the two water companies to maximise water efficiency in all new development going beyond the adopted policy of 110litres/ person/day. The reduction in water use coupled with measures such as grey water re use is the first step in reducing the need for additional water and wastewater capacity arising from new development.	60453 (Anglian Water Services Ltd)
There should be a legal break stopping construction if new water provision for the region cannot be ensured.	58308 (I Butnar)

Table of site-specific comments posted under 'CC/WE: Water efficiency in new develpoments'

Note: the sites are highlighted in yellow

Summary of issues raised in comments	Comments highlighting this issue
In relation to Greater Cambridge Local Plan Strategic Spatial Options Assessment (November 2020), it states that by utilising recycling systems, large sites are able to successfully use recycling to reduce demand for potable water. We disagree and assert that new development (regardless of scale) is able to adopt rainwater recycling systems. Land West of London Road, Fowlmere and Land to the East Side of Cambridge Road, Melbourn can adopt rainwater recycling system if required.	58744 (Wates Development Ltd), 58759 (Wates Developments Ltd)
The Greater Cambridge Local Plan Strategic Spatial Options Assessment (November 2020) also identifies potential for introducing flood management and SuDS schemes to deliver multifunctional benefits including biodiversity enhancements. Land West of London Road, Fowlmere and Land to the East Side of Cambridge Road, Melbourn represents an opportunity for delivering a scheme which includes SuDS that provide multifunctional benefits including an opportunity to benefit and enhance designated wildlife sites.	58744 (Wates Development Ltd) 58759 (Wates Developments Ltd)
Land to the west of Cambridge Road, Melbourn (Policy S/RRA/CR) can incorporate a range of measures to ensure the delivery of a water efficient development, with homes and buildings using water efficient fixtures and fittings. Water re-use measures will be explored for the site.	58203 (Countryside Properties UK Ltd)

Summary of issues raised in comments	Comments highlighting this issue
North Cambourne (Policy S/CB) will aim to reduce potable water consumption to the levels set out above by utilising low flow fixtures and fittings throughout the development.	57897 (Martin Grant Homes)
Recognise the complexities of water scarcity and the Local Plan's measurements to improve water efficiency. Water efficiency, rainwater harvesting, and greywater harvesting will be intrinsic to the emerging water management strategy at Cambridge East from the outset. However, Marshall recognises that additional strategic water strategies will be required to facilitate the wider Local Plan. Cambridge East (S/CE) is keen to liaise with WRE and stakeholders in order to formulate a solution.	58446 (Marshall Group Properties)

CC/DC: Designing for a changing climate

Hyperlink for comments

Open this hyperlink- Policy CC/DC: Designing for a changing climate > then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

Number of representations for this policy: 39

Executive Summary

Support for the policy was expressed within representations from a variety of respondents; several proposed additional elements to include in the policy such as site-wide adaptive measures, green walls and sustainable drainage systems. Other respondents, such as Bassingbourn-cum-Kneesworth PC, questioned the applicability of some of the policy's technical stipulations which could require rephrasing elements of the policy's wording. Respondents also disagreed about the scope of the policy. Some, such as the Cambridge Doughnut Economics Action Group, thought it should go further and provide targets for developers to meet. Contrastingly, some respondents, including the Home Builders Federation, felt that the councils had not adequately considered how the policy would affect the viability of housebuilding. Several respondents, such as Countryside Properties, also asserted that this was not a matter for planning but should be left to Building Regulations.

Table for Policy CC/DC

Summary of issues raised in comments	Comments highlighting this issue
Support for policy	**Individuals**

Summary of issues raised in comments	Comments highlighting this issue
	56505 (D Clay), 60124 (C Blakeley), **Public Bodies** 56617 (Gamlingay PC), 56880 (Bassingbourn-cum-Kneesworth Parish Council), 58412 (Linton PC), 59192 (Cambourne TC), 59723 (Environment Agency) 60435 (Great and Little Chishill PC), **Third Sector Organisations** 57020 (The Wildlife Trust), 57771 (Carbon Neutral Cambridge), 58619 (Cambridge Past, Present & Future), 59029 (RSPB Cambs/Beds/Herts Area), **Developers, Housebuilders and Landowners** 58210 (Countryside Properties UK Ltd), 58452 (Marshall Group Properties), 58559 (Croudace Homes), 58754 (Trumpington Meadows Land Company a joint venture between Grosvenor Britain & Ireland and Universities Superannuation Scheme), 58755 (Wates Development Ltd), 58765 (Wates Developments Ltd),
Policy needs to be adopted as soon as possible	56505 (D Clay)
More detail is needed to ensure commercial developments do not suffer from, or contribute to, flood risk after prolonged periods of	56868 (Save Honey Hill Group), 57615 (J Pratt)

Summary of issues raised in comments	Comments highlighting this issue
rain or flash flooding and their operation does not contribute to released heat production.	
Agree in principle but changes are needed, including: • Policy needs to be extended beyond residential to large industrial developments and effort made to convert existing buildings, such as shops. • New buildings should use alternative entrance methods to preserve heat and reduce CO2 production, and where possible efforts should be made to adjust existing retail buildings. • Tree cover as a cooling mechanism cannot be achieved quickly in large urban developments but grass cove, which contributes equally to CO2 absorption, has similar effects and green landscaping allows surface drainage.	56868 (Save Honey Hill Group)
In relation to the ‘design-led’ approach on p.33, how does one decide which approach is applicable?	56880 (Bassingbourn-cum-Kneesworth Parish Council)
Could it be considered obligatory to use tm59 on larger developments?	56880 (Bassingbourn-cum-Kneesworth Parish Council)
Would CIBSE TM52 be appropriate for non-domestic buildings	56880 (Bassingbourn-cum-Kneesworth Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
It would be good to ensure that drainage and SuDS are included in this policy. We are receiving more queries on whether surface water proposals are going to include consideration for climate change, so having this written in policy would be useful.	56946 (Cambridgeshire County Council)
The current wording in relation to the cooling hierarchy proposed within this policy is too technical and will be difficult to work in practice. This is contrary to paragraph 16 (d) of the NPPF that requires Plans to contain policies that are clearly written and unambiguous.	57170 (Southern & Regional Developments Ltd), 57243 (European Property Ventures – Cambridgeshire)
Persimmon Homes state that it is not appropriate to refer to guidance within policy as this can be ever-changing and is guidance not set policy.	57383 (Persimmon Homes East Midlands)
Incomplete policy - Expand to include industrial developments	57539 (C Martin), 57615 (J Pratt), 56868 (Save Honey Hill Group)
Passive measures should be the top priority for keeping buildings cool in the heat waves that are to come, as this will reduce the overall cost, reduce energy consumption and improve wellbeing	57771 (Carbon Neutral Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
No mention of installing Ground Source Heat Pumps underneath Green Spaces. If these community systems are not put in before the infrastructure, it will be expensive to retrofit.	57808 (Histon & Impington PC)
The desire for large areas of glass on modern residential buildings without adequate shading results in a large warming effect on the dwelling. Consideration should be given to this with a warming environment and passive solutions mandated to avoid overheating and further energy use for cooling.	57820 (D Lister)
The policy does not set any limits for how many homes need to be passively designed and built, just a priority ordering, which will be left up to the developer to choose from with no clear goals to reach.	57989 (Cambridge Doughnut Economics Action Group)
These and the other environmental policies demonstrate that development should not be promoted on the basis of transport links alone, but rather wider regard has to be had to the scope of the site for development of the highest sustainability standards in terms of energy consumption, access to renewable and sensitivity to, and ability to work with, the immediate environment.	58559 (Croudace Homes)
BREEAM excellent should be required for all public buildings.	58619 (Cambridge Past, Present & Future)
The Aspinall Verdi Viability Study states no additional build cost has been included, as it is assumed heat mitigation can be built into design at no additional cost. Whilst there may be scope to	58755 (Wates Developments Ltd), 58765 (Wates Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
introduce some passive design through materials, the hierarchy also includes mechanical ventilation. Mechanical Ventilation is not included within typical build cost, and we therefore raise concerns whether viability has accounted for sufficient costs to fully deliver Policy across all developments.	
The policy direction should apply to the delivery of new floorspace only.	58979 (Metro Property Unit Trust)
Not necessarily relevant to high-level policy wording, we would expect GC to develop guidance on design – eg: use of biodiverse and/or biosolar roofs (not sedum), the need for SuDS source control, the necessity for biodiverse planting schemes and trees suitable to the climate conditions we expect etc.	59029 (RSPB Cambs/Beds/Herts Area)
Although this also relates to CC/NZ, we would also draw your attention to the use of green walls to help regulate building temperature and provide insulation.	59029 (RSPB Cambs/Beds/Herts Area)
Site wide approaches should include appropriate lower densities through good design which allow for beyond minimum garden space and space for SuDS and open space and greening.	60124 (C Blakeley)
The Councils' viability assessment consider this policy to be deliverable at no extra cost. However, there could be additional	60166 (Home Builders Federation), 58979 (Metro Property Unit Trust)

Summary of issues raised in comments	Comments highlighting this issue
costs associated with this policy and it will be necessary that these extra costs are factored into the viability assessment to ensure they are fully considered.	
Whilst the HBF accept that new homes must be designed to take account of the impacts of climate change we do not agree with the Councils' assertion that they should designed using the Good Homes Alliance Overheating in New Homes Tool and Guidance. As such we would suggest that any references to such toolkits are made outside of policy.	60166 (Home Builders Federation)
Comments relating to water, include: • The reservoir provision alone will not be sufficient for the demand unless water neutrality is assured in new development. • We agree with the national Environment Agency that only a 60-70% reduction in present abstraction will return our rivers to more normal flow • We also question the Government's calculation of the overall risks from climate change to future population growth in this region, which seem to be increasing. • Until the proposed Fens and South Lincolnshire reservoirs come online in the 2030s, the companies must cap abstraction and supply all new demand in Greater	60172 (Cam Valley Forum)

Summary of issues raised in comments	Comments highlighting this issue
Cambridgeshire by water transfers from surface water sources to the west and the north. They also need to invest in compulsory metering, leakage reduction and demand management. The local authorities should do everything in their power to support this dramatic readjustment in our water supplies. • Companies treating wastewater should invest in spill monitoring, stormwater storage, and phosphate reduction to 0.2 mg/l total phosphorus, at all works that discharge to Chalk streams • Recognising that all Chalk streams now lie within 'areas of serious water stress', they should establish a new baseline of annual restrictions on water use and tighten these as necessary in response to environmental as well as supply triggers.	
Further research needs to be undertaken to understand the future challenges we face.	60435 (Great and Little Chishill PC)
Highlight need to consider impact of extreme weather events on existing buildings as well as new ones, and the need for buildings to be kept in good condition.	60748 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
Policy CC/DC: Designing for a changing climate, is ‘closing the stable door after the horse has bolted’.	59575 (Campaign to Protect Rural England)
In 2021, the government varied out consultation on new building regulation requirements. Policy CC/ DC should be deleted on the grounds that its objectives will be required via Building Regulations which have been proposed by the national government and this policy would therefore be unsound on the basis that it is introducing an unnecessary additional burden on development given that it duplicates the requirement of the building regulations.	59547 (Countryside Properties – Bourn Airfield), 59950 (Taylor Wimpey), 60605 (Countryside Properties- Fen Ditton Site)
This policy may be ineffective as it requires each developer to implement the guidance in a manner that is appropriate for their site and which therefore may differ from one development to the next.	59547 (Countryside Properties – Bourn Airfield) 60605 (Countryside Properties- Fen Ditton Site) 59950 (Taylor Wimpey),
Welcome the reference to site wide approaches to reduce climate risks. However, criticisms of policy include: • In the context of flooding and climate change it would also be appropriate to reference flood resistance and resilience measures. In their representation, they have referenced specific planning policy guidance. • Site wide approaches should also include adaptive measures such as setting a development away from a river so it is easier to improve flood defences in the future.	59723 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
• Making space for water to flood and be stored will be critical to long term adaptation. Planning to avoid future flood risk is as much about creating storage or contributing to nature-based flood risk reduction measures as it is avoiding flooding to new properties. • Recommend GCSP also consider the ADEPT local authority guidance on preparing for a changing climate (2019) and the new TCPA The Climate Crisis, A Guide for Local Authorities on Planning for Climate Change (October 2021). • The Fens Baseline Report indicates that rising sea levels to 2115 will mean water will not drain by gravity to the sea, requiring the pumping of vast quantities of water. The carbon and engineering implications of this are significant but not yet calculated. There is a compelling case for surface water to infiltrate into permeable ground ensuring that water resources are not depleted of water. In areas of less permeable geology, net gains in surface water attenuation and re-use of the water as ‘green water’ in homes, businesses or agriculture has been considered through this study.	

Summary of issues raised in comments	Comments highlighting this issue
Support but would like to see additional emphasis given to existing buildings.	59914 (Fen Ditton PC)

Table of site-specific comments posted under 'CC/DC: Designing for a changing climate'

Note: the sites are highlighted in yellow

Summary of issues raised in comments	Comments highlighting this issue
The site Land to the East Side of Cambridge Road, Melbourn offers opportunity to deliver low carbon housing, electronic charging points, promote low water consumption/ water recycling and is in proximity to sustainable forms of transport	58765 (Wates Developments Ltd)
The site Land to the west of Cambridge Road, Melbourn will benefit from the action plan set out in the 'Pathfinder: Net Zero' report to deliver its commitments. Key elements include: • Following a fabric first approach to the design of dwellings to achieve high levels of efficiency through improving window glazing, air tightness, roof insulation, wall thickness and improved floor insulation and underfloor heating. • Apply the principles of their energy hierarchy to help reduce both regulated and unregulated energy usage. This includes supplying only A-rated energy efficient appliances, using smart meters and	58210 (Countryside Properties UK Ltd)

Summary of issues raised in comments	Comments highlighting this issue
smart thermostats to reduce energy consumption by learning living and heating patterns, developing a suite of e-learning packages and support material to help households reduce consumption and live more efficiently. • The site presents an opportunity to provide significant landscaping as shown on the Illustrative Masterplan. This can contribute to urban greening and increasing tree canopy across the site, which is currently an arable field, reducing climate risks through landscape design. • In relation to sustainable drainage, it was confirmed through the previous outline application that a suitable drainage system can be delivered as part of the proposals that incorporates the use of SuDS doesn't increase the risk of flooding on or off site and accounts for climate change allowances.	
Cambridge East is being designed to mitigate and respond to climate change. Buildings will be designed to reduce overheating given their proposed orientation, ventilation, and through the appropriate design of streets and green infrastructure. Site wide approaches will also be adopted, including SuDS and urban greening.	58452 (Marshall Group Properties)
If the Fowlmere site was to come forward, it would be built to the highest building and sustainability standards	58559 (Croudace Homes)
Our scheme for North Cambourne will utilise a site-wide approach to reduce climate risks, including: • The integration of sustainable drainage systems as part of the landscape design, the use of urban greening to reduce heat build-up in developed areas through increased tree canopy cover and integrated green space. • Heat gain into buildings will be minimised through fenestration design and external shading where needed.	57898 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
• Natural ventilation strategies will be employed to ensure buildings are able to purge excess heat effectively. • All overheating measures will be thoroughly tested in accordance with the Good Homes Alliance Overheating Tool to ensure the risk of overheating is minimised. • Additional analysis will be conducted where required, accounting for future weather scenarios with increased air temperatures.	
Policy should be expanded to include Waste Water Treatment Plant proposal to relocate to Honey Hill, especially the office block and visitor centre.	57615 (J Pratt)

CC/FM: Flooding and integrated water management

Hyperlink for comments

Open this hyperlink- Policy CC/FM: Flooding and integrated water management > then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

Number of representations for this policy: 48

Executive Summary

A variety of organisations expressed support for the policy. Several respondents, including Cambridgeshire County Council and the Environment Agency, thought the policy was going in the right direction by managing water on site at source. There was support for incorporating brown/green roofs where practical, use of permeable surfaces and use of sustainable drainage systems (SuDS) as ways to reduce flooding in new development. Many comments highlighted the impacts of climate change and the effects on weather and flooding and that this would need to be considered. There were comments from Anglian Water on the benefits of sustainable drainage systems for improving water quality and reducing the amount of water entering the wastewater system.

The Environment Agency thought that the scope of the policy needed to be widened to reduce flood risk in a more holistic manner including securing both mitigation and betterment through growth. Similarly, the Cam Valley Forum proposed including areas for storage of flood waters. Organisations including Historic England argued that the policy needed to ensure that the design of SuDS would not harm other aspects of the built or natural environment. Several organisations, such as the Campaign for the Protection of Rural England, objected to the policy on the grounds that it was inadequate to deal with the increased flood risks in the area. Wates Development argued that sites of all scales and not just large sites can adopt ambitious water use targets and implement water recycling systems.

Table of representations for Policy CC/FM: Flooding and integrated water management

Summary of issues raised in comments	Comments highlighting this issue
Support for policy approach	**Individuals** 60125 (C Blakeley) **Public Bodies** 56618 (Gamlingay PC), 59194 (Cambourne PC), 59316 (Cambridgeshire and Peterborough Combined Authority), 59724 (Environment Agency), 59823 (Dry Drayton PC), 59915 (Fen Ditton PC) 59974 (Natural England) 60436 (Great and Little Chishill PC), 60454 (Anglian Water) 60479 (Anglian Water 2nd comment) 56947 (Cambridgeshire County Council) **Third Sector Organisations** 56905 (Save Honey Hill Group), 57021 (The Wildlife Trust), 57772 (Carbon Neutral Cambridge), 59031 (RSPB Cambs/Beds/Herts Area), 60174 (Cam Valley Forum), 60749 (Cambridge and South Cambridgeshire Green Parties) **Developers, Housebuilders and Landowners**

Summary of issues raised in comments	Comments highlighting this issue
	57171 (Southern and Regional Developments Ltd), 57244 (European Property Ventures, Cambridgeshire). 58457 (Marshall Group Properties), 58457, 58758 (Trumpington Meadows Land Company a joint venture between Grosvenor Britain & Ireland and Universities Superannuation Scheme)
Development should not be permitted in flood plains or flood prone areas (Flood Zone 3)	56618 (Gamlingay PC), 56742 (Croydon PC), 56881 (Bassingbourn-cum-Kneesworth PC), 59107 (Great Shelford PC), 59481 (Shepreth PC)
Developments should incorporate brown /green roofs where practical	56618 (Gamlingay PC)
Water supply is not sustainable due to the lack of rainfall in the area. Reservoirs will just remove wate from aquifers and chalk streams and not address the real problem. The only solution is through increased efficiency, less housing in plans and importation of water from other areas.	56798 (Heydon PC)
Could there be reference to types of storms that need to be accounted for in drainage calculations?	56881 (Bassingbourn-cum-Kneesworth PC)
Water quality needs to be a standalone point within the flood management policy. It should refer to SuDS management train as multi-stages of treatment through cascading structures.	56947 (Cambridgeshire County Council)
Surface water systems should be designed with an allowance of climate change included.	56947 (Cambridgeshire County Council)
Reference should ideally be made to the Cambridgeshire Flood and Water SPD or any subsequent version of this. It is noted that the policy will not need to repeat items covered by the NPPF, however, reference should be made to this.	56947 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
The County Council are supportive of integrated management including SuDS being incorporated into the design of schools. However, it should be acknowledged that this is likely to increase the size of the site required for a school and currently the Council policy is to request the minimum site size. If SuDS are on the surface as pond, child safety would need to be considered. It would be most appropriate for any targets to be incorporated in policy to be the subject of a technical assessment on their achievability and cost before being formally adopted.	56947 (Cambridgeshire County Council)
Careful flood and water management in Greater Cambridge will also facilitate benefits and minimise impacts in the surrounding districts.	57369 (Huntingdonshire District Council)
The requirement for hard surfacing to be permeable should ensure that they meet the requirements of the Local Highways Authority for adoptable road standards.	57384 (Persimmon Homes East Midlands)
In addition to requiring that the risk of flooding is not increased elsewhere as a result of new development (including peak runoff rate should be no greater for the developed site than it was for the undeveloped site), in setting out the approach to runoff rates, the Plan should be clear there should be no reduction in runoff rates under non-flood circumstances. This will ensure biodiversity in downstream watercourses is not adversely impacted, and similarly the amenity of flowing streams and rivers is not compromised by upstream developments.	57793 (J Pavey)
Grey water should be used wherever possible	57875 (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Before any work starts anywhere with historic flooding, flood management must be implemented and approved by independent experts. SCDC have approved plans where residents have informed them of flooding issues and within a year, the area has flooded. Examples include Hunter's Close, Impington and Park Primary, Histon and nothing is being done to fix it. Next time, maybe use simulations (via independent experts).	57875 (Histon & Impington PC)
The whole plan is proposed despite the knowledge that in the short-, medium-, and long-term ongoing growth will cause further disruption to the chalk aquifer and habitats on which we all depend. Until an approach to dealing with this is found, massive development on this scale cannot take place without inevitable and irreversible damage to the water ecosystem.	57991 (Cambridge Doughnut Economics Action Group)
The fields south of the city are already flooded over the winter months and photos are attached. With climate change this is set to get worse. Permission for development was rejected for the 2018 Plan because of flooding. Why would this have improved now?	58173 (Dr S Kennedy)
Policy doesn't take adequate account of the local heavy clay soil. A better drainage recommendation is needed for low infiltration areas, together with stronger planning review and enforcement. If the recommendation includes surface features such as swales, lower housing density may be required to allow sufficient space.	58293 (M-A Claridge)

Summary of issues raised in comments	Comments highlighting this issue
This should be explicitly recognised, and this space should be distinct from areas set aside as Public Open Space.	
A register of areas with flooding issues should also be maintained, and systematically be consulted in any planning applications. This should include areas with reported local drainage issues, as many villages have flooding problems caused by drainage systems that have been compromised by previous developments, which are not reflected on the Environment Agency risk map.	58293 (M-A Claridge)
Unfortunately, a significant portion (more than 60%) of the land covered by this Local Plan is unsuitable for infiltration systems. Watercourses will not often be available. This means that over a large part of Greater Cambridge, the only available drainage system will be the already overstretched sewerage system which is not good enough.	58293 (M-A Claridge)
There is a large overlap between the area where SuDS systems will be impractical and the sites submitted for development, especially to the west of Cambridge. Increasing housing density and increased extreme rainfall makes this more critical	58293 (M-A Claridge)

Summary of issues raised in comments	Comments highlighting this issue
Made more aware of increasing intensity of summer storms and severity of summer droughts.	58414 (Linton PC)
Requests that policy: • requires reduction of run-off rates from pre-development levels, • Recognises value of SuDS for greenspace and biodiversity and encourage above-ground SuDS • Avoids SuDS which encourage wildlife to crossroads (which necessitates avoiding locating SuDS surrounded by roads) • Policy needs to meet requirements of Environment Agency, Lead Local Flood Authority and water companies	58628 (Cambridge Past, Present & Future)
Assessment recommends growth be concentrated in new settlements or urban extensions that avoid high flood risk and have high standards for design of flood risk management, water usage and re-use, and blue-green infrastructure. Decisions should follow a Location Opportunities and Constraints Categorisation and Scoring which assesses and scores each proposed growth strategies.	58769 (Wates Developments Ltd) 58773 (Wates Development Ltd)
Disputed why development within the Minor Rural Centres and Group Villages have been disregarded as an appropriate growth	58769 (Wates Developments Ltd) 58773 (Wates Development Ltd)

Summary of issues raised in comments	Comments highlighting this issue
strategy if they are able to meet ambitious water usage targets and implement water recycling systems.	
Disagree with assessment that large sites are able to successfully use recycling to reduce demand for potable water. Because actually new development (regardless of scale) is able to adopt rainwater recycling systems.	58769 (Wates Developments Ltd) 58773 (Wates Development Ltd)
The RSPB supports the principles set out for this policy, particularly with reference to source control. Our experience is that this is often an element which is not implemented well due to supposed practical constraints which are not necessarily justified. We believe that Greater Cambridge have an opportunity to push the boundaries to make this a standard practice in new development.	59031 (RSPB Cambs/Beds/Herts Area)
We suggest that references to green roofs should be changed to biodiverse and/or biosolar (to preclude the use of sedum roofs which have limited utility). Where use of permeable surfaces is not practicable, source control should again be implemented.	59031 (RSPB Cambs/Beds/Herts Area)
The scale of envisaged growth and development is out of line with the water resources available, and in terms of sewage capacity and nutrient burdens from discharges. This should be an intrinsic	59291 (National Trust)

Summary of issues raised in comments	Comments highlighting this issue
consideration throughout the Local Plan. The Local Plan needs to be future-proofed and requires agility to respond to the changing and increasing pressures that are likely to come forward for the water environment over the plan period.	
Policy is totally inadequate in the face of the increasing flood risks arising in the county, the greatest of which is the likely loss of a high percentage of the Fens to flooding within decades.	59577 (Campaign to Protect Rural England)
Due to rising sea level and reduction of flow in River Cam, the Council is 'sowing the seeds of its own destruction'; firstly, it is creating avoidable carbon emissions which will contribute to global temperature rise. Secondly, that temperature rise will cause large parts of the county to flood permanently. Thirdly, the additional run-off from development will increase the risk of flooding and bring forward the date of permanent flooding of large parts of the county. This issue must be taken far more seriously than the token gesture of Policy CC/FM.	59577 (Campaign to Protect Rural England)
Policies should acknowledge the risks to traditional buildings from flooding, especially the need for such buildings to be able to dry out slowly and that care must be taken not to introduce inappropriate retrofitted measures which would prevent effective drying and shorten the life of the building. Historic England ask the	59669 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
Council to refer to their guidance which is attached in the representation.	
Policies on SuDS should advise that they need to be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology though the design of SuDS. We advise that waterlogged deposits, such as peat have the potential to preserve organic remains that are relatively rare in the archaeological record. They are of great importance for the information they provide about everyday objects.	59669 (Historic England)
To maintain the preservation of organic materials, it is essential that the conditions which contributed to their survival remain the same. While saturated with water, oxygen is excluded which limits the presence/action of most soil fauna and fungi which feed on organic matter. The lowering of the water-table in an area could result in the remains becoming exposed to oxygen, which can enhance the degradation and loss of any remains that are present. Historic England ask the Council to refer to their guidance which is attached in the representation.	59669 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
The Policy states that “Development will be directed to the areas with the least likelihood of flooding from all sources and taking into account climate change”. It would be helpful if such data were to be readily available publicly.	59776 (B Hunt)
Look forward to co-operation between SCDC and CCC on sustainable drainage solutions so that developments along the East-West Rail arc do not impact on the Independent Drainage Board areas and Cottenham Lode in particular and consideration to take varying infiltration rates to accommodate the impact of climate change.	59882 (Cottenham PC)
Would like to see additional emphasis given to: - existing buildings - role of flood defences and the expectation that some defended flood plains will continue to be effective - avoidance of sewage flooding risk being transferred from one location to another	59915 (Fen Ditton PC)
Proposed requirements for developments to provide integrated water management, including sustainable drainage systems (SuDS) where possible and for SuDS and green /brown roofs to	59974 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
provide multiple benefits (including biodiversity and amenity) are welcomed.	
As indicated above the WCS will need to demonstrate how water, to meet growth needs, will be supplied sustainably without adverse impact to the natural environment.	59974 (Natural England)
Infrastructure should be operational before housing occupation. Especially managing hard surface run off.	60002 (Steeple Morden PC)
We are pressing for a more integrated approach by the Environment Agency, Natural England, farmers and Local Authorities. The Local Plan should recognise that episodic 'flooding', may be increasingly likely with climate change. This can be mitigated upstream by slowing river drainage. We have had over 60 years of ill-advised river dredging in our lowlands to increase arable areas on farms. To reverse this trend would help. This would require a reversion to an earlier pattern of agricultural land-use management with wet meadows and less arable land in the flood plain itself. Other measures could include: - South Cambridgeshire could develop a larger flood plain basin with a wet woodland as a buffer against future Cambridge City flood events. These sites would also contribute to provide biodiversity and recreational benefits	60174 (Cam Valley Forum)

Summary of issues raised in comments	Comments highlighting this issue
- Restoring riparian grazing grasslands would sequester carbon efficiently - an added bonus to our carbon depleted soils.	
The role of SuDS in improving water quality through intercepting points of pollution such as vehicle fluid spills should also be referenced in support of the policy.	60454 (Anglian Water) 60479 (Anglian Water)
Integrated water management also reduces the amount of wastewater requiring pumping, treatment and discharge through reusing water that would otherwise end up in the sewer network or potentially increase flood risk.	60454 (Anglian Water), 60479 (Anglian Water)
The reduction in water use and integral design of sustainable drainage systems will though in future need to be supplemented by an integrated approach to water management that maximises opportunities to re-use and recycle water so that the residual runoff from developed land is proactively utilised and slowed reducing the frequency, duration, and severity of flooding.	60454 (Anglian Water) 60479 (Anglian Water)
We have issues with water drainage and sewage; what guarantees will there be here?	60493 (Melbourn Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
We have the speeding issues increasing the village by a further 160 houses will undoubtably cause logistical issues.	60493 (Melbourn Parish Council)
Need for investment in flood management infrastructure, and for effective management of water on site to ensure no detriment downstream.	60506 (Ely Group of Internal Drainage Boards)
Water from development sites needs to be managed on-site and future new settlements and infrastructure projects should help to invest in flood risk assets in the fens.	60506 (Ely Group of Internal Drainage Boards)
The Fens pumping station have limited capacity and are ageing assets which need reinvestment.	60506 (Ely Group of Internal Drainage Boards)
If the risk of flooding is not increased elsewhere as a result of new development, it will be essential to assess the cumulative impact of development at catchment level.	60749 (Cambridge and South Cambridgeshire Green Parties)
Given the water challenges (our comments to Policy S/DS) it should strive to secure both mitigation and betterment through growth. We would also like to see: 1. It should seek to secure betterment and reduce flood risk overall, wherever possible, as part of GC's strategy to adapt to climate change. Making space for water to flood and be	59724 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
stored will be critical to long-term adaptation. Protection of potential flood storage land and financial contributions towards flood risk schemes could also benefit communities at risk of flooding. 2. Provision for water supply and wastewater infrastructure, ensuring water quality and treating and re-using waste water. We recommend that the provisions of Policy CC/7, 'Water Quality', of the South Cambridgeshire Local Plan 2018 are considered and brought forward into the Greater Cambridge Local Plan. Site policies may also need to include specific infrastructure requirements. 3. There needs to be a policy approach that recognises a clear integration encompassing water resources, water quality, flood risk and recognising the role of green infrastructure. Although the value of green infrastructure and river corridors is recognised in policy BG/GI and BG/RC, it is worthwhile including it as part of the integrated water management policy. 4. Restoration of natural flood plains where practicable and provision of green infrastructure can help reduce flood risk along the rivers itself and beyond. Wet woodland will self-set and grow where conditions are right and management allows. Providing the right conditions for trees to grow in appropriate locations in river corridors can support flood risk mitigation and biodiversity	

Summary of issues raised in comments	Comments highlighting this issue
In relation to the Integrated Water Management Study – Outline Water Cycle Strategy (WCS) welcome that the Outline WCS has been amended based on our previous feedback. However, a number of issues raised remain unresolved, including: • Some of the information presented does not represent the proper 'baseline' for subsequent assessments and the extent of the challenge of delivering the quantum of growth proposed in the Local Plan • The identified assessment methods need to be sufficiently robust, and potential mitigation actions will need to be shown to be viable. • The Detailed WCS will need to provide evidence to demonstrate the delivery of foul drainage provision can be provided whilst protecting water quality of rivers.	59724 (Environment Agency)
The local policy approach should be informed by the IWMS Water Cycle Studies, the Level 1 SFRA and other relevant strategies, and in some areas level 2 SFRA.	59724 (Environment Agency)
It needs to be more obviously demonstrated how the Sequential Test and sequential approach to all forms of flooding has been applied. The Planning Practice Guidance advises several options for this including a standalone report, Sustainability Appraisal commentary, etc. This will need to be produced in time for the next	59724 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
draft plan consultation so it is clear how the test has been applied and demonstrated.	
We think that a Level 2 SFRA is necessary particularly for those sites located on the fringes of Flood Zones 2 and 3, or partially within those zones. Some sites have unmapped ordinary watercourses running alongside or through them and often these have not been modelled as part of the indicative flood map due to their limited upstream catchment size. As such there is some uncertainty over the level of flood risk to the site, with the potential that fluvial flood risk may be greater than the Flood Map for Planning. These sites will require further investigation to better refine the flood extents preferably by flood risk modelling or utilising the Flood Map for Surface Water	59724 (Environment Agency)

Table of site-specific comments posted under 'CC/FM: Flooding and integrated water management'

Note: the sites are highlighted in yellow

Summary of issues raised in comments	Comments highlighting this issue
Land West of London Road, Fowlmere presents an opportunity for delivering a scheme which includes SuDS that provide multifunctional benefits including an opportunity to benefit and enhance designated wildlife sites. It also is located in a Flood Zone 1 and can meet the ambitious water targets of the Local Plan.	58769 (Wates Developments Ltd)
Land East Side of Cambridge Road, Melbourn presents an opportunity for delivering a scheme which includes SuDS that provide multifunctional benefits including an opportunity to benefit and enhance designated wildlife sites. It also is located in a Flood Zone 1 and can meet the ambitious water targets of the Local Plan.	58773 (Wates Development Ltd)
The Caxton Gibbet Site, The prevailing surface water strategy to be adopted is a network of positive drainage consisting of, and not limited to, the following SuDS features: • Open swales / rills; • Living Roofs • Blue Roofs (these can also be used in areas of Living Roof) • Attenuation Basins (with some localised pond/wetland features); • Porous Paving (where feasible); • Bio-retention areas; and • Rainwater Harvesting.	59324 (Endurance Estates- Caxton Gibbet Site)
North Cambourne is in Flood Zone 1, so is at low risk of flooding from rivers and the sea. However, there are some isolated areas of the site at risk of surface water flooding, adjacent to existing watercourses. Through an integrated site-wide SuDS strategy, this risk will be mitigated within public open spaces and potentially mitigated through a centralised rainwater harvesting system to reduce potable water	57899 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
consumption. The SuDS strategy will aim to ensure that the peak runoff rate post development is no greater than that which currently exists on the site.	
Policy will be particularly important in high density developments such as NECAAP where appropriate SuDS will be needed and hard surfaces need to be permeable. Stormwater management will also be important to reduce storm overflows, with SuDS and ponds needed to attenuate flow.	56905 (Save Honey Hill Group)
North Cambourne is located in Flood Zone 1, so is at low risk of flooding from rivers and the sea. However, there are some isolated areas of the site at risk of surface water flooding, adjacent to existing watercourses. Through an integrated site-wide SuDS strategy, this risk will be mitigated within public open spaces and potentially mitigated through a centralised rainwater harvesting system to reduce potable water consumption. The SuDS strategy will aim to ensure that the peak runoff rate post development is no greater than that which currently exists on the site.	57899 (Martin Grant Homes)

CC/RE: Renewable energy projects and infrastructure

Hyperlink for comments

Open this hyperlink- Policy CC/RE: Renewable energy projects and infrastructure > then go to the sub-heading ‘Tell us what you think’> click the magnifying glass symbol

Number of representations for this policy: 30

Executive Summary

A variety of organisations expressed support for the policy. There were several suggestions to improve the policy; including the delivery of an accessible anaerobic digestion plant, the incorporation of community power projects into new settlements and the installation of solar panels onto the roof of houses. Some respondents argued that the policy needed to emphasise an holistic, district-wide strategy to renewable energy production, whereas others focussed upon how individual buildings could contribute. One respondent questioned whether the electric cables in South Cambridgeshire’s villages have capacity to support electric cars or heat pumps. Several parish councils noted that the policy should include access to funding to support renewable projects. Public and third sector organisations stated that the policy should consider its impact upon the character of surrounding landscape, biodiversity, the historic environment, and the policy should not encourage development that would interfere with military aviation activities. Objections to the policy included those from the Campaign to Protect Rural England, who argued that the policy would not halt the removal of farmland.

Table of representations for Policy CC/RE Renewable Energy Project and Infrastructure

Summary of issues raised in comments	Comments highlighting this issue
Support for policy	**Individuals** 58311 (I Butnar), **Public Bodies** 56619 (Gamlingay PC), 56743 (Croydon PC), 56882 (Bassingbourn-cum-Kneesworth Parish Council), 57370 (Huntingdonshire DC), Linton PC (58416), 59195 (Cambourne TC), 59670 (Historic England), 59975 (Natural England), 60437 (Great and Little Chishill PC) **Third Sector Organisations** 56910 (Save Honey Hill Group), 57023 (The Wildlife Trust), 57773 (Carbon Neutral Cambridge), 60750 (Cambridge and South Cambridgeshire Green Parties), **Developers, Housebuilders and Landowners** 57172 (Southern & Regional Developments Ltd), 57245 (European Property Ventures - Cambridgeshire), 58462 (Marshall Group Properties), 58760 (Trumpington Meadows Land Company a joint venture between Grosvenor Britain & Ireland and Universities Superannuation Scheme)

Summary of issues raised in comments	Comments highlighting this issue
There is a requirement for localised publicly accessible anaerobic digestion plants to assist agriculture and removal of grass cuttings and tree trimmings to create electricity for the local area. There currently isn't one in Cambridgeshire.	56619 (Gamlingay PC), 58311 (I Butnar)
Community power projects should be part of new settlements	56743 (Croydon PC)
The renewable energy and infrastructure policy needs to address the problems distributing electricity more effectively.	56823 (J Graffy)
There should be greater emphasis on encouraging property owners to fit solar panels to roofs. There are many, many roofs which could have solar panels installed. The Cambridgeshire Solar Together initiative was a small step to improve this, but much more could be done	56823 (J Graffy)
Neighbours tried to install an air source heat pump nearby, but were unable to, because the cable in the road would not take the power load and it was too expensive to improve this. The commentator suspects that many Cambridgeshire villages have inadequate electricity cables, which will block the installation of fast charging for electric cars and Air Source Heat Pumps.	56823 (J Graffy)
Renewable energy projects should be developed early in the plan period to facilitate the move to electric vehicles and heat pumps.	56882 (Bassingbourn-cum-Kneesworth Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
Would a scoring matrix / reference be useful to rank these projects against biodiversity and heritage?	56882 (Bassingbourn-cum-Kneesworth Parish Council)
Section 4vii needs to be expanded to include that not only visual impacts must be mitigated but also auditory, especially for wind energy.	56910 (Save Honey Hill Group)
This policy may interact with the Cambridgeshire and Peterborough Minerals and Waste Local Plan, in respect of energy from waste and district heating. Early consultation about the wording of this policy would be appreciated.	56948 (Cambridgeshire County Council)
It is considered that any potentially hazardous uses such as battery storage facilities should be accompanied by a risk/safety assessment and appropriate responses to unforeseen events and meet the requirements as set out in the NPPG.	57370 (Huntingdonshire DC)
The Huntingdonshire Local Plan supports proposals for renewable and low carbon energy through policy LP35. Consideration of Landscape, townscape and heritage impacts must be addressed as part of the development. The Council would expect any such development within proximity of the Huntingdonshire boundary to consider this in its assessment. Huntingdonshire District Council have produced a Landscape Townscape SPD which can be used to assess the effects of any schemes that are in proximity to the Huntingdonshire District.	57370 (Huntingdonshire DC)

Summary of issues raised in comments	Comments highlighting this issue
Micro generation, with a mandate for solar panels on all new developments, could help meet the renewables target.	57825 (D Lister)
Battery storage to help balance grid load is also an effective strategy to avoid peak demand requiring non-green energy generation.	57825 (D Lister)
As stated in the section on net zero carbon new buildings, the renewable infrastructure needed will need to be large to meet the housing demand, let alone for the infrastructure. A very clear and integrated plan will be needed, rather than leaving it to individual developers.	57992 (Cambridge Doughnut Economics Action Group)
Possible improvements to policy include: • Is there a scope for district heating/cooling instead of individual homes? • No mention of smart grids to smooth peaks in demand/supply, which determine the size of required battery storage.	58311 (I Butnar)
Would not support onshore windfarms due to effect on landscape, loss of farmland, noise pollution and lack of wind in this area	58416 (Linton PC)
Marshall appreciates that there is significant movement towards greening of the centralised national grid, but considers it may be more efficient in the future to utilise green energy from the grid	58462 (Marshall Group Properties)

Summary of issues raised in comments	Comments highlighting this issue
rather than to produce it locally and therefore believes policy should be flexible enough to support that if necessary.	
Policy must clearly protect the character and appearance of the landscape and need clear guidance on where wind and solar farms and energy infrastructure is acceptable.	58632 (Cambridge Past, Present & Future), 59036 (RSPB Cambs/Beds/Herts Area)
Impacts on biodiversity from renewable projects need to be minimised. Therefore, we also support the provision of biodiversity impact criteria specific to renewable projects.	59036 (RSPB Cambs/Beds/Herts Area)
RSPB's report Energy Futures has mapped how the UK can meet very high renewable energy provision whilst safeguarding nature and we would be pleased to discuss with the Greater Cambridge Councils how our Energy Vision peer-reviewed mapping methodology could be used to help identify suitable sites for renewable and low carbon energy.	59036 (RSPB Cambs/Beds/Herts Area)
The policy is totally ineffective to halt the use of scarce farmland for solar energy generation. Instead, the Local Plan should include a policy that halts the use of scarce farmland for solar energy generation and ensure that solar installations are mandated on all industrial buildings, new and existing.	59574 (Campaign to Protect Rural England)
Support the policy, but include the following changes:	59670 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
• Include consideration of the impact on the historic environment for all commercial renewable energy technologies. • Renewable energy policies should include reference to heritage assets and their settings (in conjunction with Local Plan heritage policies) and should seek to ensure that any harm to the significance of a heritage asset is satisfactorily addressed in the planning balance. • The policy, or its supporting text, should not use arbitrary distance measurements for assessments from heritage assets to locations proposed for large-scale renewables. Instead, the policy should ensure that settings are fully assessed, on a case by case basis. • Biofuel crops such as short rotation coppice (willow) and Miscanthus can have a substantial below ground impact on buried archaeology, especially waterlogged archaeology. Palaeochannels, peats, kettle holes and other glacial features that preserve waterlogged sediments are often the very areas targeted for growing energy crops. Many of these impacts on the archaeological resource are covered by the Preservation of Archaeological Remains guidance. This guidance is linked in the representation. • Para.155 of the NPPF advises LPAs to consider identifying suitable areas for renewable and low carbon energy sources in their plans and strategies. Therefore, your plan's evidence	

Summary of issues raised in comments	Comments highlighting this issue
base should include studies assessing areas of potential, particularly for the suitability of wind and solar power generation. An appropriate methodology should be used; i.e. all heritage assets in the area should be identified, arbitrary distance measurements should be avoided, and the setting of heritage assets should also be included as a consideration.	
Broadly support, but object to standalone projects in the Green Belt and the lack of weight given to success of National Grid in importing sustainable energy to GC or role of district schemes in major new developments.	59916 (Fen Ditton PC)
We recommend that the Plan takes a more holistic approach to securing multi- functional benefits for climate change, flood management, water resources and water quality through the protection and enhancement of the natural environment. Natural solutions can achieve significant additional benefits for biodiversity, green infrastructure and associated health and wellbeing benefits, enhanced landscapes, and soil resources.	59975 (Natural England)
Future development and trends will increase the use of electricity so do we have an obligation to consider where we might generate this locally by solar and/or wind?	59998 (Steeple Morden PC) 60080 (Guilden Morden PC)
There should be clear comments on how and where solar PV farms and windfarms are going to be planned.	59998 (Steeple Morden PC)

Summary of issues raised in comments	Comments highlighting this issue
Support for community led projects but should include access to funding.	59998 (Steeple Morden PC), 60080 (Guilden Morden PC)
Where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their associated infrastructure	60042 (Defence Infrastructure Organisation)
The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities. Where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations with associated impacts upon aviation safety and operational capability. Planning Practice Guidance published on the Gov.uk website acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.	60042 (Defence Infrastructure Organisation)

Summary of issues raised in comments	Comments highlighting this issue
We need to keep ahead of new renewable technologies and review these yearly.	60437 (Great and Little Chishill PC)
Given our net zero commitment for support policy CC/RE on renewable energy. Anglian Water welcomes the policy support for renewables projects at our facilities which coupled with Policies 1 and 11 in the Cambridgeshire Minerals and Waste Local Plan enable us to maximise renewable energy generation which reduces our carbon impacts and increases the resilience of our water recycling network.	60456 (Anglian Water Services Ltd)
We would want to have continued joint working with other stakeholders such as the Environment Agency to agree matters such as a joint approach to calculating growth. Anglian Water proposes that a Statement of Common Ground approach is taken as part of Duty to Cooperate to reach agreement on evidence and methodology with the two Councils and the Environment Agency.	60456 (Anglian Water Services Ltd)

Table of site-specific comments posted under 'CC/RE: Renewable energy projects and infrastructure'

Note: the sites are highlighted in yellow

Summary of issues raised in comments	Comments highlighting this issue
The potential for the use of on-site and local off-site renewables is also to be investigated as the vision develops and Marshall is currently seeking support to help develop an energy strategy focussed on renewables for Cambridge East.	58462 (Marshall Group Properties)

CC/CE: Reducing waste and supporting the circular economy

Hyperlink for comments

Open this hyperlink- Policy CC/CE: Reducing waste and supporting the circular economy > then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

Number of representations for this policy: 31

Executive Summary

A variety of organisations expressed support for the policy. Respondents, such as Cambridgeshire County Council, included suggestions to make the policy more legible to members of the public. Some organisations, including Croydon PC, suggested ideas to improve the policy, such as ensuring that new settlements have community bins similar to ones implemented in Eddington. Respondents differed in their reactions to the scope of the policy; the Cambridge Doughnut Economics Action Group for example, argued that targets were needed to ensure developers deliver the policy. Contrastingly, some respondents, such as the Metro Property Unit Trust, sought to narrow the policy's scope, suggesting that the policy should only be applied to major developments. The Home Builders Federation asserted that these requirements should be dealt with via national regulation as opposed to local planning policy. Some developers, such as Martin Grant Homes, used their representations to explain how their proposed site accords with the policy's requirements.

Table of representations for Policy CC/CE Reducing waste and supporting the circular economy

Summary of issues raised in comments	Comments highlighting this issue
Support for policy and proposed scope.	57024 (The Wildlife Trust), 57371 (Huntingdonshire DC), 57672 (J Conroy), 57774 (Carbon Neutral Cambridge), 58418 (Linton Parish Council), 58464 (Quod on behalf of Marshalls), 59037 (RSPB), 59197 (Cambourne Town Council), 60194 (J Preston), 60438 (Great and Little Chishill PC),
Support for policy – where possible existing buildings should be reused and there should be policies covering retrofit.	58638 (CambridgePPF), 59917 (Fen Ditton PC), 60194 (J Preston)
(Moved from CC/WE) Supports policy to promote the reuse and/ or recycling of materials arising from demolition works on development sites.	57377 (Huntingdonshire DC)
Local recycling and production of local electricity is key – alternative power sources needed west of Cambridge	56620 (Gamlingay PC)
More community bins like those at Eddington should be included in new settlements	56744 (Croydon PC)
Construction Environmental Management Plan should prioritise on-site reuse and recycling over off-site to minimise emissions from transport.	56883 (Bassingbourn-cum-Kneesworth PC)
Could prescriptive waste targets be considered – recognising difficulties in benchmarking different building types but would impose obligations to design out waste from the start.	56883 (Bassingbourn-cum-Kneesworth PC)
Support inclusion of policy – give Circular Economy priority over reducing waste in the title as this has much wider scope.	56949 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
Explicitly link policy with policy CC/NZ as the two policies interact with one another	56949 (Cambridgeshire County Council)
Reference to RECAP Waste Management Guide and Minerals and Waste Policy CC/6 welcomed. The MWPA would welcome further discussion on this topic, potentially as part of a SoCG.	56949 (Cambridgeshire County Council)
The waste hierarchy proposed by the Draft Plan reads “Refuse, Reduce, Reuse, Repurpose, Recycle”. It is appreciated that this is based on the “5 r’s”, but to avoid confusion the Councils may wish to either clarify in the policy or supporting text that ‘refuse’ is seeking to minimise avoidable resource use and not the refusal of planning permissions or development outright. The waste hierarchy as set out in Appendix A of the National Planning Policy for Waste (October 2014) is: Prevention, Preparing for Re-use, Recycling, Other recovery, Disposal.	56949 (Cambridgeshire County Council)
Suggest reference to potential contamination from the reuse of building materials be included to ensure no adverse impacts with regards to water pollution downstream.	57371 (Huntingdonshire DC)
Agree in principle. Should include how removal and transport of materials from demolition and remediation works should be included in the CEMP to reduce impact of carbon footprint of HCVs	57508 (Save Honey Hill Group).
Does this mean planning will be supportive of creative solutions included within domestic design?	57868 (Histon and Impington PC)
Would be great to have a re-use economy here including library of things – would need top level support and space allocated.	57868 (Histon and Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
The economics don't seem to work (rents too high for domestic recycling or repair operation in this area).	
Need to see absolute metrics of waste and circularity applied to new developments to ensure developers don't depart from them in practice.	57993 (Cambridge Doughnut Economics Action Group)
Residential waste also needs consideration alongside construction waste.	58313 (I Butnar)
Policy wording should acknowledge that CEMPs are usually prepared at the detailed design stage when site layout is secured.	58780 (Wates Developments)
Policy should be applied to major developments only with commensurate requirements for minor developments outlined in the policy	58987 (Metro Property Unit Trust)
Concerned that the LPA is not looking at this aspect when looking at increasing jobs and growing business. Growth cannot continue indefinitely as there are simply not enough resources.	59111 (Great Shelford PC)
Fully supports objectives around waste reduction and circular economy and requirements related to CEMPs which we already commit to. Happy to provide a Circular Economy Statement but would request that this be proportionate to the size and scale of development and that the policy allows for use of bespoke techniques and practices on site for those with large and efficient supply chains.	59549 (Turley on behalf of Countryside – Bourn Airfield), 59951 (Turley on behalf of Taylor Wimpey), 60606 (Turley on behalf of Countryside – Fen Ditton site)
Policy is far too weak – all unnecessary construction should be refused and all construction reduced including the excessive	59578 (Campaign to Protect Rural England)

Summary of issues raised in comments	Comments highlighting this issue
building across South Cambs proposed by the Draft Plan. Existing constructions to be reused, repurposed, or recycled	
Broadly support proposals for policy. Should recognise sustainability over the long-term and impacts on embodied energy associated with demolition. Encourage and recognise benefits of sympathetic restoration, retention, refurbishment of historic buildings rather than demolition and replacement.	59671 (Historic England)
Understand the need to reduce waste but Council is placing more and more requirements on applicants without having the resource and knowledge in-house to assess or provide guidance on these matters. Such requirements should be dealt with via national regulation not local planning.	60641 (Home Builders Federation)
No mention of need for different approach to buildings of traditional solid wall construction. Climate Change section of the plan should quite key principles and guidance	60194 (J Preston)
Coordination with the Minerals and Waste Plan will be crucial	60751 (Cambridge and South Cambs Green Parties)
How could small-scale projects be brought within this policy?	60751 (Cambridge and South Cambs Green Parties)

Table of representations for CC/CE: Reducing waste and supporting the circular economy
Note: the sites are highlighted in yellow

Summary of issues raised in comments	Comments highlighting this issue
Support for Circular Economy principles as best means for ensuring materials stay in their highest use state for longest period. Principles will be adopted for North Cambourne	57901 (Savills on behalf of Martin Grant Homes)

CC/CS: Supporting land-based carbon sequestration

Hyperlink for comments

Open this hyperlink- Policy CC/CS: Supporting land-based carbon sequestration > then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

Number of representations for this policy: 39

Executive Summary

There was strong support for this policy from a range of organisations and individuals including Parish Councils, The Wildlife Trust, Carbon Neutral Cambridge, Cambridge Past Present and Future, and agents acting on behalf of developers such as Marshall and Countryside Properties. Many of those commenting could see the value in protecting sites and land important for carbon sequestration including undisturbed peatlands and woodlands and the wider benefits that such an approach could bring, including biodiversity enhancement. There were no specific objections to the policy itself. Rather, comments suggested how the policy could be strengthened, how the policy would be implemented, and made some useful suggestions of how new developments could ensure that green infrastructure provided as part of development could be enhanced to increase its role in carbon sequestration.

Table of representations for CC/CS Supporting land-based carbon sequestration

Summary of issues raised in comments	Comments highlighting this issue
(Strong) support for the policy • Encouraging increasing levels of soil carbon through sustainable land uses including habitat creation and restoration and GI provision helps	**Individual** 57673 (J Conroy), 58420 (Linton PC),

Summary of issues raised in comments	Comments highlighting this issue
mitigate climate impacts as well as providing multifunctional environment, societal and economic benefits. • Links to biodiversity and greenspaces policy and achieving high quality design. • Support for new wetland environments and a tree strategy to create planned sustainable locations for trees locally	**Public Bodies** 56745 (Croydon PC), 56884 (Bassingbourn-cum-Kneesworth PC), 57378 (Huntingdonshire DC), 59199 (Cambourne Town Council), 60439 (Great and Little Chishill PC), **Third Sector** 57026 (The Wildlife Trust), 57775 (Carbon Neutral Cambridge), 58641 (Cambridge Past, Present and Future), 58939 (National Trust), 60752 (Cambs and South Cambs Green Parties),
Contribution to carbon storage of soils from new market gardens should be recognised, alongside land management methods that enhance carbon storage in soils, where that is in the power of the Councils (e.g. no dig etc). Need for a corresponding contribution from arable farming management although recognise that this is outside scope of this plan.	56689 (D Fox)
Protect rural grass bridleway network from inappropriate 'improvement' (i.e. tarmac surfaces) to protect their role in sequestration and value for wildlife.	56702 (British Horse Society)
Developments over a certain threshold should require a soil management plan to demonstrate maintenance of carbon sequestration into the future.	56884 (Bassingbourn-cum-Kneesworth PC)
Need to explain why we have not responded to all the issues highlighted.	56890 (J Prince)
Particularly support protection of undisturbed or undrained peat and approaches that minimise soil disturbance, compaction and disposal during construction projects.	57378 (Huntingdonshire DC)
Support for policy – perhaps a suitable use of land in the Green Belt or on lower grade agricultural land.	60126 (C Blakeley)

Summary of issues raised in comments	Comments highlighting this issue
Help get closer to carbon zero by planting trees and rewilding the Fens. More development and more people defeats that objective.	58061 (B Marshall)
Policy needs to be more closely linked with the policy about environmentally friendly farming to increase coherence between food production and biodiversity/ecosystem protection and enhancement.	58161 (H Thomas)
Prioritise land based carbon sequestration which enhances biodiversity and other natural functions (water quality and quantity, flood prevention, soil quality).	58316 (I Butnar)
Look to significantly expand tree cover in Greater Cambridge whilst also protecting and enhancing existing woodlands and other important non-woodland habitats such as peat.	58890 (Woodlands Trust)
Nature-based solutions have an important role to play in reducing carbon emissions including creation of wetlands.	59039 (RSPB Cambs/Beds/Herts)
Welcome the proposed approach and the recognition of the importance of peatlands given the area of peatland that remains in the north of South Cambridgeshire district. Recommend that the plan takes a more holistic approach to securing multifunctional benefits for climate change, flood management, water resources and water quality through protection and enhancement of the natural environment.	59976 (Natural England)
Agree that woodlands and peatlands need protection. New development can also deliver carbon sequestration benefits with creation of multi-functional green infrastructure which should be recognised as part of overall carbon performance of new development. Policy should contain text to support new development if it can be demonstrated that the green infrastructure and woodland it provides will sequester carbon.	59550 (Turley on behalf of Countryside – Bourn Airfield), 59952 (Turley on behalf of Taylor Wimpey), 60607 (Turley on behalf of Countryside – Fen Ditton site)

Summary of issues raised in comments	Comments highlighting this issue
Puzzled by the policy as there is little undrained peat in Greater Cambridge. Is the policy aimed at justifying re-flooding the Fens due to effects of greenhouse gas emissions and increased run-off that increased construction will cause.	59579 (Campaign to Protect Rural England)
Support aspiration but object to the Plan as stated – too much imprecise generalisation. It is not automatic that the suggested actions in the Plan will always be improvements. Land quality must be considered.	59918 (Fen Ditton PC)

Table of site-specific comments posted under CC/CS Supporting land-based carbon sequestration
Note: the sites are highlighted in yellow

Summary of issues raised in comments	Comments highlighting this issue
Agree in principle – this policy along with GP/BB means it is inappropriate to develop the proposed CWWTP relocation to Green Belt at Honey Hill (inappropriate that the development on this existing carbon sink has not been included in Policy S/EOC)	57511 (Save Honey Hill Group), 57523 (Mrs C Martin), 57614 (Mr J Pratt), 57618 (Mr J Pratt), 58068 (Horningsea PC), 58132 (Mr M. Asplin),
Pouring a million tonnes of carbon rich concrete on Honey Hill shows your rhetoric to be ludicrous	57534 (A Martin)
CWWTP should not be moved – will release tonnes of embedded (embodied) carbon	57542 (A Martin), 57600 (A Martin)
Landscape strategy at Cambourne North will be designed to sequester carbon as well as providing biodiversity and landscape benefits. With 400 acres of open space, if 5% 20 ha) is planted as new woodland it would sequester approx. 4,500 tonnes of CO_2 over the next 100 years.	57902 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
Marshall is supportive of a policy that seeks to ensure that carbon offsets for net zero are directed locally and support other ecosystem functions. Offsetting embodied carbon from construction of Cambridge East could facilitate creation of significant areas of new habitat/enhancement of existing habitats such as Fenland and soils. Would welcome opportunity to work with GCSPS to scope out planning mechanism to facilitate this. Would query ruling out the afforestation of existing farmland and would seek clarification as to whether this includes all farmland or farmland of a certain quality or which is currently operational.	58481 (Quod on behalf of Marshalls)