

Appendix A: Statement of Consultation



GREATER CAMBRIDGE SUSTAINABLE DESIGN AND CONSTRUCTION SUPPLEMENTARY PLANNING DOCUMENT (SPD)

CONSULTATION STATEMENT

(Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 12))

1. Introduction

1.1 Under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 it is a requirement to prepare and make available a Consultation Statement setting out:

- The persons the local planning authority consulted when preparing the supplementary planning document;
- A summary of the main issues raised by those persons; and
- How those issues have been addressed in the supplementary planning document;

1.2 This statement is a record of consultation undertaken prior to the adoption of the Greater Cambridge Sustainable Design and Construction SPD.

2. Background

2.1 The Greater Cambridge Sustainable Design and Construction SPD has been prepared to assist with the implementation of policies related to climate change, sustainable design and construction and wider environmental policies contained within the adopted 2018 Cambridge and South Cambridgeshire Local Plans.

3. Preparation of the draft SPD

In preparing the draft SPD, informal consultation has been carried out with a range of internal officers within Cambridge and South Cambridgeshire District Councils. Once sections of the SPD had been drafted, these were emailed to technical officers within the Council for comment, with relevant changes then incorporated into the document.

Internal workshops were also held with development management officers. These led to a number of changes or additions to help with navigation of the

document, including the tables setting out the requirements for each local planning authority area contained within section 1 of the document. Additional guidance was also included in the contaminated land section related to the process that should be undertaken when unexpected contamination is encountered on development sites.

A number of changes were also made to the document as a result of the committee process. Mostly these related to providing clarification, for example in the South Cambridgeshire guidance on air quality, additional text was added to clarify that while the Council wished to avoid the development of buildings with sealed fascias, this should not preclude the use of mechanical ventilation with heat recovery to supplement natural ventilation, where these systems are correctly specified, installed and maintained. Reference to autonomous vehicles was also added to the section of the document that considers the role of smart city technologies. Other changes included minor editorial amendments.

4. Consultation on the draft Greater Cambridge Sustainable Design and Construction SPD

It is proposed that a public consultation takes place running from 15 July 2019 for to the 23 September 2019. The statutory minimum period for consultation on an SPD is six weeks, as this consultation period runs over the summer holidays it is proposed that it is extended to allow everyone an opportunity to respond.

5. Consultees

The following stakeholders will be directly notified of the draft Greater Cambridge Sustainable Design and Construction SPD in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) via email, or by post where no email address is available. Also, where we have been advised by individuals that they wish to engage in the preparation of planning policy documents, they will be contacted.

The stakeholders who will be contacted are set out in the Council's adopted Statement of Community Involvement (July 2019). In summary these stakeholders include, but are not limited to:

- Specific Consultation Bodies;
- Local Parish Councils;
- Local Members;
- Cambridgeshire County Council;
- Greater Cambridge Partnership;
- Adjacent Local Authorities;
- Cambridgeshire and Peterborough Combined Authority;
- Delivery partners, including landowners, developers, infrastructure providers, transport providers;
- Community organisations;
- Local businesses;

- General Consultation Bodies: including bodies which represent the interests of different diversity groups including based upon age, race, religion, disability; and organisations representing other interests e.g. environment, sports, heritage.

In order to inform residents across the district, local community organisations and local businesses, the following methods of notification will be used:

- a public notice in Cambridge Independent;
- through the Councils webpages and social media

6. Consultation Methodology

Consultation on the draft Greater Cambridge Sustainable Design and Construction will take place from: **9 am on Monday 15 July 2019 to 5pm on the 23 September 2019**

The draft SPD to be made available to view at the following locations:

- Online on the councils websites at:
www.scambs.gov.uk/sustainableconstructionsdpd and
www.cambridge.gov.uk
- South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA;
- At Cambridge City Council's Customer Service Centre at Mandela House, 4 Regent Street, Cambridge, CB2 1BY from 9am-5.15pm Monday to Friday.
- Alternative formats of the consultation documents will be made available upon request (e.g. braille, translations into other languages and large print).

Comments can be made using:

- the online consultation system: <https://cambridge.jdi-consult.net/localplan/> ; or
- by completing the consultation response form. Completed forms can be returned to:
 - Planning Policy, Cambridge City Council, PO Box 700, Cambridge, CB1 0JH
 - Planning Policy, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA;
 - Or emailed to policysurveys@cambridge.gov.uk

Respondents can request to be notified of the adoption of the SPD.

Issues raised during the public consultation

During the consultation a total of 257 representations were received, 253 of which were to the SPD and 4 of which were to the Habitats Regulations Assessment and Sustainability Appraisal Screening Reports. Of the representations received to the SPD, 48 were in support of the provisions in the SPD, 113 were in objection and 92 were comments on the SPD. Officers

are now in the process of responding to these representations and, where necessary, recommending amendments to the SPD

All of the representations are available to be read in full on our online consultation system at: <https://cambridge.jdi-consult.net/localplan/>. The following sections set out the representations received to the consultation, provides a Council assessment of the issues and where necessary what proposed modifications to the SPD are required.

Summary tables of representations received, Council response and proposed modifications.

Section 1: Introduction

34129	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>It is considered that the requirement for a separate Sustainability Statement will lead to duplicate information being provided with applications. For example, the Planning Statement, Design & Access Statement, Transport Assessment, Ecological Assessment, Energy Statement for example will already address sustainable design and construction matters. It is suggested that a revamped Sustainability Checklist could be used to ensure that all relevant matters have been addressed for a proposed development, and would direct the decision maker to relevant documents or parts of documents related to sustainability; the suggested amendments to the Sustainability Checklist are set out below. This approach would reduce the amount of material that Planning Officers and statutory consultees would need to review, and would be consistent with the National Planning Policy Guidance 2019 in terms of only providing information necessary for decision making.</p>
<p>Councils Response:</p> <p>The requirement for the submission of a Sustainability Statement is specifically referenced in policies in both the Cambridge and the South Cambridgeshire local plans. Not all of the information required to be included in the Sustainability Statement will be covered in other documents, however where this is the case, it is considered appropriate for the Sustainability Statement to include a short summary of this information, with reference to further detail in associated documents.</p>	
34128	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p>

	<p>it is considered that Tables 1.2 and 1.3 provide a useful summary of the policy requirements relevant to sustainable design and construction. However, it would be helpful if these tables included an additional column that identified the relevant sustainability checklist criteria relevant to each topic. The purpose of this request is to provide all relevant information in one place.</p>
<p>Councils Response: Comment noted –reference to the relevant section of the Sustainability Statement will be added to these tables.</p> <p>Change to the SPD: Add the relevant sustainability checklist criteria to Tables 1.2 and 1.3</p>	
34127	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>The principle of making development more sustainable is supported by Hill. However, it is considered that the draft Greater Cambridge Sustainable Design and Construction SPD would be ineffective in delivering sustainable development, and the format and content of the document is unhelpful for potential users including Council officers, applicants and local residents. A key criticism of the draft SPD is that it is too long and is not user friendly. There is other national and local guidance and standards that already exists, which addresses most of the matters identified in the draft SPD, and do not need to be repeated.</p> <p>A simpler and more effective approach would be for the draft SPD to signpost potential users to that other guidance. A revamped Sustainability Checklist (including an interactive online toolkit) would provide a more useful and useable tool for potential users</p>
<p>Councils response: The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. The level of detailed guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications.</p>	
34121	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p>

	<p>U&C welcomes the opportunity to contribute to this consultation on the SPD and would like to continue its involvement as a key stakeholder through the Council's work towards its adoption. U&C would be keen to discuss social components of sustainable development including local employment and training concepts associated with strategic development projects. U&C welcomes the general alignment between the guidance within the SPD and its ambitions for the sustainable development of Waterbeach Barracks and for development within Greater Cambridge more broadly. In this context, the comments set out within this letter are generally positive. It is requested, however, that the minor amendments described are given consideration in order to ensure that the SPD is clear, aligned with relevant local plan policies and can most effectively support the delivery of the SPD's objectives.</p>
<p>Councils response: Comment noted.</p>	
34106	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>It is noted that once adopted, the SPD will become a material consideration in the determination of planning applications. Given that the SPD will be a key influence over the lifetime of the development, the SPD requirements should be flexible to the range of demands placed upon development projects and responsive to changing technologies and new opportunities for climate change adaption.</p> <p>Whilst the SPD does describe how to use the document, and colour coding is applied, U&C suggest that further clarification would be helpful to ensure that it is clear which requirements relate to development within Cambridge City and which apply to development with South Cambridgeshire. As the requirements are derived from the policies of two separate Local Plans there are discrepancies in the standards which apply.</p> <p>If this SPD is adopted prior to the adoption of the emerging Greater Cambridge Local Plan, the SPD will need to be revised or updated again to reflect these newly adopted policies. In the meantime, this SPD cannot establish new policy but only be supplementary to the existing adopted plans for a relatively short period.</p>
<p>Councils response: Concerns regarding the need for flexibility in application of the Councils policy requirements are noted. It is recognised that the Greater Cambridge Sustainable Design and Construction SPD is being prepared at a time of changing national policy, and some additional wording will be added to the SPD to reflect this.</p>	

With regards to the adoption of the SPD prior to the adoption of the Greater Cambridge Local Plan, the SPD has been developed to provide guidance on existing policies in the adopted Cambridge Local Plan and South Cambridgeshire Local Plan. It is considered that, due to the technical nature of these policies, it is important to produce implementation guidance now in order to ensure the effective application of policies. The SPD does not seek to introduce new planning policy requirements ahead of the development of the Greater Cambridge Local Plan.

Change to the SPD:

Add a new paragraph after 3.1.2 as follows:

3.1.3 It is recognised that this SPD has been produced at a time of changing national policy, particularly in relation to carbon reduction from new development and measures to support electric vehicles. Changes to Building Regulations may have implications for the implementation of adopted policies in the Cambridge and South Cambridgeshire local plans. In light of this, further technical guidance on the implementation of affected policies may be produced once such changes are brought in.

34105	<p>(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>U&C's overarching view is that the SPD represents a positive and ambitious commitment to the delivery of relevant policies of the South Cambridgeshire Local Plan. U&C is keen to work in partnership with the Council to secure the opportunity for sustainable development at Waterbeach Barracks. In the light of this, U&C is pleased that there is a good alignment between the emerging SPD and its proposals for Waterbeach Barracks.</p>
-------	--

Councils response:
 Support noted.

34104	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Mrs Kati Preston [2801] Received: 23/9/2019 via Email</p> <p>The document makes it clear that it is addressing existing adopted policies. It also, by implication acknowledges that climate change is both on-going and urgent. It must therefore be that this document will provide a base line for even more robust requirements and measures that are needed if we are to be able to achieve net zero carbon by 2030.</p>
-------	--

Councils response:

Net zero carbon is referenced in the introduction to the SPD at paragraphs 1.10 and 1.17 and the importance of planning in helping to deliver this target is recognised. However Supplementary Planning Documents cannot be used to set new policy requirements, and as such the Greater Cambridge Sustainable Design and Construction SPD must focus on providing guidance on the implementation of existing policy, which was developed prior to announcements related to net zero carbon. However, additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.

Further work on Net Zero Carbon will be carried out as part of the development of the Greater Cambridge Local Plan, and the Councils have committed to introducing policies related to net zero carbon as part of this document. Further work is being commissioned to provide the evidence base for these policies, which will also consider whether elements of net zero carbon can be achieved ahead of the 2050 deadline set in the Climate Change Act.

Change to the SPD:

Insert new paragraph after 1.17 to read:

The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.

34092	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>1) failure to reference Net Zero by 2050 commitment, and latest Climate Change Committee reports 2) overall, is the SPD ambitious enough? Are updates planned to reflect the latest Net Zero commitment?</p>
-------	--

Councils response:

Net zero carbon is referenced in the introduction to the SPD at paragraphs 1.10 and 1.17 and the importance of planning in helping to deliver this target is recognised. However Supplementary Planning Documents cannot be used to set new policy requirements, and as such the Greater Cambridge Sustainable Design and Construction SPD must focus on providing guidance

on the implementation of existing policy, which was developed prior to announcements on net zero carbon. However, additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.

Further work on Net Zero Carbon will be carried out as part of the development of the Greater Cambridge Local Plan, and the Councils have committed to introducing policies related to net zero carbon as part of this document. Further work is being commissioned to provide the evidence base for these policies, which will also consider whether elements of net zero carbon can be achieved ahead of the 2050 deadline set in the Climate Change Act.

Change to the SPD:

Insert new paragraph after 1.17 to read:

The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.

34091	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>1) failure to consider re-use, repair and refurbishment of existing buildings in the context of the Circular Economy and other Government policies /initiatives</p> <p>2) inadequate consideration of whole-life carbon from materials to disposal. Use BS EN 15978:2011 Sustainability of Construction Works instead.</p> <p>3) Table 1.1. "Social / wellbeing" should include historic environment</p> <p>4) 1.17 should include specific commitments by the Councils to both good practice in all their own developments, repairs, refurbishments and retrofits, and using their own and others' projects to develop a properly trained competent workforce.</p>
-------	--

Councils response:

The guidance within the SPD primarily relates to the development of new

buildings, although consideration is given to works to heritage assets in section 3.10 of the document. Further consideration will be given to policies related to the Circular Economy and whole life carbon as part of work to develop the Greater Cambridge Local Plan.

Table 1.1 of the SPD identifies some of the benefits of sustainable design and construction. While the historic environment can have social benefits, this is not considered to be as a direct result of sustainable design and construction and as such, it is not considered appropriate to add reference to the historic environment to this table.

With regards to setting standards for Council developments, the SPD applies to all types of development and as such, it is not considered appropriate to use a planning document to set corporate policies related to the Councils own projects. This approach is better dealt with by way of the Councils Climate Change Strategies and other relevant strategies.

34090	<p>(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: John Preston [5295] Received: 23/9/2019 via Email The overall approach of the SPD, notably 3.4.16 - 28 and 3.5</p>
-------	---

Councils response:
 Support noted

34087	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033] Received: 23/9/2019 via Email We note that there is no mention of communications connections to properties. Residents tell us that they strongly recommend that there should be super fast fibre connections to all properties to encourage home working and reduce the need to travel. To be installed in pipework so the fibre can be upgraded as technology develops.</p>
-------	---

Councils response:
 Comment noted. Policy TI/10 (Broadband) in the South Cambridgeshire Local Plan and 42 (Connecting new development to digital infrastructure) require provision to be made for high capacity broadband in new developments to help facilitate increased home working.

34078	<p>(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033] Received: 23/9/2019 via Email 1.8 Strongly support importance of spatial planning importance to</p>
-------	--

	<p>deliver the right development in the right plan. However, residents add that addressing the challenges of climate change and health, social equality and quality of life benefits from local knowledge and the involvement of residents who know about water, flooding, wildlife and nature and managing green spaces and local resources in their areas, working with their councillors. Decisions about land use and ecology should not be left to unknown experts, without local knowledge or accountability.</p>
<p>Councils response:</p> <p>Support noted. While the knowledge of local residents is acknowledged and supported, work on Sustainable Design and Construction does require technical input from experts in their field. As such, it is considered important that as part of future work related to net zero carbon and the role of the planning system in responding to the climate emergencies we engage with local residents as well as other stakeholders including built environment professionals.</p>	
34051	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>It is considered that the requirement for a separate Sustainability Statement will lead to duplicate information being provided with applications. For example, the Planning Statement, Design & Access Statement, Transport Assessment, Ecological Assessment, Energy Statement for example will already address sustainable design and construction matters. It is suggested that a revamped Sustainability Checklist could be used to ensure that all relevant matters have been addressed for a proposed development, and would direct the decision maker to relevant documents or parts of documents related to sustainability; the suggested amendments to the Sustainability Checklist are set out below. This approach would reduce the amount of material that Planning Officers and statutory consultees would need to review, and would be consistent with the National Planning Policy Guidance 2019 in terms of only providing information necessary for decision making.</p>
<p>Councils response:</p> <p>The requirement for the submission of a Sustainability Statement is specifically referenced in policies in both the Cambridge and the South Cambridgeshire local plans. Not all of the information required to be included in the Sustainability Statement will be covered in other documents, however where this is the case, it is considered appropriate for the Sustainability Statement to include a short summary of this information, with reference to further detail in associated documents.</p>	
34050	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p>

	<p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>it is considered that Tables 1.2 and 1.3 provide a useful summary of the policy requirements relevant to sustainable design and construction. However, it would be helpful if these tables included an additional column that identified the relevant sustainability checklist criteria relevant to each topic. The purpose of this request is to provide all relevant information in one place.</p>
	<p>Councils response: Comment noted –reference to the relevant section of the Sustainability Statement will be added to these tables.</p> <p>Change to the SPD: Add the relevant sustainability checklist criteria to Tables 1.2 and 1.3</p>
34049	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>The principle of making development more sustainable is supported by Endurance Estates. However, it is considered that the draft Greater Cambridge Sustainable Design and Construction SPD would be ineffective in delivering sustainable development, and the format and content of the document is unhelpful for potential users including Council officers, applicants and local residents. A key criticism of the draft SPD is that it is too long and is not user friendly. There is other national and local guidance and standards that already exists, which addresses most of the matters identified in the draft SPD, and do not need to be repeated.</p> <p>A revamped Sustainability Checklist (including an interactive online toolkit) would provide a more useful and useable tool for potential users; suggested amendments to the checklist are set out below. A simple Sustainability Checklist would also be easier to update as and when new guidance and standards are published.</p> <p>Endurance Estates strongly suggests that a roundtable event/ workshop involving relevant Council Officers and Planning Consultants/ promoters and developers is held in order to discuss the responses to and outcome of this consultation. Much like the draft local plan workshops held, this would provide the opportunity to look at existing policy, guidance and literature available within the framework of the draft SPD and discuss how such a document can constructively and pragmatically support sustainable design and construction as well as the potential adverse impacts on the development industry that could be associated with the existing recommendations. Endurance</p>

	<p>Estates could coordinate, or assist with the coordination of, such a workshop through it's membership of the Cambridgeshire Development Forum.</p>
	<p>Councils response:</p> <p>The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. The level of detailed guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications.</p> <p>With regards to the role of a workshop, it is considered that such an approach would be more productive as part of work to inform future policy development as part of the development of the Greater Cambridge Local Plan. The development of policies related to the role of the planning system in delivering net zero carbon will require input from all sectors of the development industry, and as such it is considered that resources would be better focussed on future policy development.</p>
34048	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email</p> <p>Countryside supports the provision of the Sustainable Design and Construction SPD which sets out overarching guidance on the requirements of Cambridge City Council and South Cambridgeshire District Council on the delivery of sustainable development.</p> <p>Countryside generally support the SPD as drafted but consider there are areas where amendments are considered necessary to ensure that the requirements are feasible and deliverable for all new development and respect the changing national context and guidance being drafted by government.</p>
	<p>Councils response:</p> <p>Support noted. It is recognised that the Greater Cambridge Sustainable Design and Construction SPD is being prepared at a time of changing national policy, and some additional wording will be added to the SPD to reflect this. With regards to feasibility and viability, this is dealt with in paragraphs 3.1.3 and 3.1.4 of the SPD. While the policy requirements for which the SPD provides guidance have already been subject to viability testing, the Councils are willing to take a pragmatic approach in cases where technical feasibility or viability make policy compliance challenging. In such cases, it is important that applicants seek early engagement with the Councils</p>

as part of the pre-application process in order that alternative ways in which the aims of the Councils sustainability policies can be agreed in principle.

Change to the SPD:

Add a new paragraph after paragraph 3.1.2 as follows:

3.1.3 It is recognised that this SPD has been produced at a time of changing national policy, particularly in relation to carbon reduction from new development and measures to support electric vehicles. Changes to Building Regulations may have implications for the implementation of adopted policies in the Cambridge and South Cambridgeshire local plans. In light of this, further technical guidance on the implementation of affected policies may be produced once such changes are brought in.

34035	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email</p> <p>Large scale development - In the provision of guidance for new development throughout the SPD, while good, there is a lack of flexibility and understanding in the development of large scale schemes such as Bourn Airfield New Village. Developments of this scale are likely to be built out over a number of years against a backdrop of changing national policy and guidance. Some key areas where greater long term flexibility is required are set out below, however greater focus needs to be included throughout the document to ensure it provides flexibility to take into account future changes to not hold development to an unsuitable technology or idea.</p>
-------	--

Councils response:

Concern noted. It is recognised that the Greater Cambridge Sustainable Design and Construction SPD is being prepared at a time of changing national policy, and some additional wording will be added to the SPD to reflect this.

Change to the SPD:

Add a new paragraph after paragraph 3.1.2 as follows:

3.1.3 It is recognised that this SPD has been produced at a time of changing national policy, particularly in relation to carbon reduction from new development and measures to support electric vehicles. Changes to Building Regulations may have implications for the implementation of adopted policies in the Cambridge and South Cambridgeshire local plans. In light of this, further technical guidance on the implementation of affected policies may be produced once such changes are brought in.

34034	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p>
-------	---

	<p>Agent: No. 6 Developments (Mr Richard Oakley) [8140] Respondent: Cambridge University Hospital NHS Foundation Trust (Carin Charlton) [8141] Received: 23/9/2019 via Email</p> <p>Overall, CUH welcomes the positive approach of Cambridge City and South Cambridgeshire District Councils in encouraging sustainable design and construction and we wish to highlight how this aligns with our own aspirations for and commitments to achieving greater sustainability and environmental performance. As noted above, our Sustainable Development Management Plan (SDMP) is being updated for presentation to the Board by December of this year.</p> <p>We consider that the SPD could incorporate some additional commentary on where exemptions from the required standards are likely to apply to the hospital, or where lower standards and/or flexibility could be applied as an alternative. We recognise that it may not be practical to amend each and every policy or reference in the guidance, but as a minimum we wish to encourage the inclusion of a reference to supplement paras 3.1.3 and 3.1.4 to signpost other considerations that may be very material to our hospital projects.</p>
	<p>Councils response:</p> <p>Concern noted. However, the policies for which the SPD provides guidance have already been subject to viability testing and have been found to be viable. While it is recognised that hospital projects may have specific requirements that need to be met, there are sufficient examples both at Addenbrookes and across other hospital campuses in England to show that the requirements set out in policy and the guidance in the SPD can be achieved for healthcare projects. Paragraph 3.1.4 does allow for feasibility and viability to be taken into consideration subject to early discussions with the Councils to ensure that the principles behind adopted policies can be achieved even if full policy compliance is not possible. This approach would apply to all types of development and as such it is not considered necessary to single out one type of development in this section.</p>
34010	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>It is considered that the requirement for a separate Sustainability Statement will lead to duplicate information being provided with applications. For example, the Planning Statement, Design & Access Statement, Transport Assessment, Ecological Assessment, Energy Statement for example will already address sustainable design and construction matters. It is suggested that a revamped Sustainability Checklist could be used to ensure that all relevant matters have been addressed for a proposed development, and would direct the decision maker to relevant documents or parts of documents related to sustainability; the suggested amendments to the Sustainability Checklist are set out below. This approach would reduce the amount of</p>

	<p>material that Planning Officers and statutory consultees would need to review, and would be consistent with the National Planning Policy Guidance 2019 in terms of only providing information necessary for decision making.</p>
<p>Councils response:</p> <p>The requirement for the submission of a Sustainability Statement is specifically referenced in policies in both the Cambridge and the South Cambridgeshire local plans. Not all of the information required to be included in the Sustainability Statement will be covered in other documents, however where this is the case, it is considered appropriate for the Sustainability Statement to include a short summary of this information, with reference to further detail in associated documents.</p>	
34009	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>it is considered that Tables 1.2 and 1.3 provide a useful summary of the policy requirements relevant to sustainable design and construction. However, it would be helpful if these tables included an additional column that identified the relevant sustainability checklist criteria relevant to each topic. The purpose of this request is to provide all relevant information in one place.</p>
<p>Councils response:</p> <p>Comment noted - reference to the relevant section of the Sustainability Statement will be added to these tables.</p> <p>Change to the SPD:</p> <p>Add the relevant sustainability checklist criteria to Tables 1.2 and 1.3</p>	
34008	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>The principle of making development more sustainable is supported by Axis Land Partnerships. However, it is considered that the draft Greater Cambridge Sustainable Design and Construction SPD is too long and is not user friendly. There is other national and local guidance and standards that already exists, which addresses most of the matters identified in the draft SPD, and do not need to be repeated. A revamped Sustainability Checklist (including an interactive online toolkit) would provide a more useful and useable tool for potential users; suggested amendments to the checklist are set out below. A simple Sustainability Checklist would also be easier to update as and when new guidance and standards are published.</p>

Councils response:	
The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. The level of detailed guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications.	
	(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email
33984	Natural England supports reference in section 1.17 of the councils' aspirations for the areas to be net zero carbon by 2050. We advise that additional reference should be made to the councils' support for Natural Cambridgeshire's recently launched Doubling Nature Vision; the SPD should include objectives to achieve this.
Councils response:	
Support noted. With regards to the Doubling Nature Vision, it is recommended that reference to this be included in paragraph 3.5.1 of the SPD. Further detail on Biodiversity is to be included in a Greater Cambridge Biodiversity SPD, which would be a more appropriate document in which to include objectives for achieve the Doubling Nature Vision.	
Change to the SPD:	
Add a reference to the Councils support for Natural Cambridgeshire's Doubling Nature Vision in paragraph 3.5.1 of the SPD.	
	(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email
33983	Natural England welcomes preparation of an SPD to help Greater Cambridge reduce its environmental impact. We support the aim to deliver benefits across the three dimensions of sustainable development including protection and enhancement of the environment and improving people's health. We welcome the SPD additional guidance to help implement policies in the Local Plans and that this will form an integral part of the design process.
Councils response:	
Support noted.	
	(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Mole Architects (Mr Meredith Bowles) [371]
33975	

Received: **23/9/2019 via Email**

There is widespread support for a more rapid acceleration towards decarbonisation than the adopted 2018 Local Plan allows for. Since the Local Plan was adopted, the Government has passed legislation in the Climate Change Act 2008 (2050 Target Amendment) Order. This fact is acknowledged in section 1.17.

We suggest that this statement is made clear at the beginning of the document, and state that the SPD is an interim document that will be amended in line with future targets. Furthermore, a date and likely target (eg. 40% reduction over 2013 building regs from 2022) should be set out in this SPD, so that the industry knows when the changes will come and the Council will have a target to aim for.

This target needs reflecting in the subsequent text:

1.9, 1.10 Should be re-written to include the latest legislation with the target of 100% by 2050

Councils response:

Concerns noted. It is recognised that the Greater Cambridge Sustainable Design and Construction SPD is being prepared at a time of changing national policy, and some additional wording will be added to the SPD to reflect this. Reference to the 80% target in the Climate Change Act 2008 will also be updated to reflect net zero carbon. However Supplementary Planning Documents cannot be used to set new policy requirements, and as such the Greater Cambridge Sustainable Design and Construction SPD must focus on providing guidance on the implementation of existing policy, which was developed prior to announcements on net zero carbon. However, additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.

Further work on Net Zero Carbon will be carried out as part of the development of the Greater Cambridge Local Plan, and the Councils have committed to introducing policies related to net zero carbon as part of this document. Further work is being commissioned to provide the evidence base for these policies, which will also consider whether elements of net zero carbon can be achieved ahead of the 2050 deadline set in the Climate Change Act. This work will need to take account of the implications of future changes to Building Regulations which are currently subject to consultation and which may limit the role of local planning authorities in setting targets related to energy efficiency for new homes. Until this work has been carried out, we are not in a position to speculate in the SPD how future carbon reduction targets will be framed.

Change to the SPD:

Amend the first sentence of paragraph 1.9 to read: The Climate Change Act 2008 (as amended) contains a statutory target of securing a reduction in carbon dioxide levels of ~~80~~100% below 1990 levels by 2050, with an interim

target of a 35% reduction by 2020.

Insert new paragraph after 1.17 to read:

The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.

33960	<p>(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Historic England (Mrs Debbie Mack) [5828] Received: 23/9/2019 via Email Table 1.3 page 23 We welcome the reference to heritage assets in the table for Cambridge.</p>
-------	---

Councils response:

Support noted.

33959	<p>(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Historic England (Mrs Debbie Mack) [5828] Received: 23/9/2019 via Email Table 1.2 page 20 We welcome the reference to heritage assets in the table for Cambridge.</p>
-------	---

Councils response:

Support noted.

33958	<p>(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Historic England (Mrs Debbie Mack) [5828] Received: 23/9/2019 via Email Table 1.1, page 11 We welcome the reference to the historic environment.</p>
-------	--

Councils response:

Support noted

33935	<p>(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cambridge Past, Present & Future (Mr James Littlewood) [8127] Received: 23/9/2019 via Email CambridgePPF strongly support the draft SPD and its provisions to</p>
-------	---

	encourage more sustainable forms of development.
Councils response: Support noted.	
33915	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>SPD should perhaps distinguish more between what is necessary to comply with national, district and neighbourhood plans and helpful additional advice on environmental and other issues.</p> <p>Coverage is: * not prioritised by relative impact of various technical areas (noise, energy, carbon, water, waste etc.) on sustainability * patchy in terms of evidence for the approaches suggested in various technical areas (noise, drainage, energy etc.), and * too narrow in application areas (new build, heritage, renovation etc.)</p>
Councils response: Comment noted. The SPD has been prepared to support policies in the adopted Cambridge and South Cambridgeshire Local Plan. It is not the intention to prioritise the different topics within the SPD as they all play an important role in the delivery of sustainable development.	
33914	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>The draft SPD is heavily biased towards new build in large developments.</p> <p>Sustainability is not due to energy/carbon usage alone; these are magnified by population increase, the development that comes with it, and people's behaviour.</p> <p>The SPD would be improved if the key sustainability consequences - probably: * temperature (overheating?) / energy consumption, * flood risk and * construction waste (inevitably linked to fly-tipping) were summarised first, given deepest consideration, and then given a priority for mitigation to ensure practical rather than theoretical relevance to specific situations.</p>
Councils response: Comment noted. The SPD has been prepared to support policies in the adopted Cambridge and South Cambridgeshire Local Plan, the focus of which is primarily new development. It is not the intention to prioritise the different	

<p>topics within the SPD as they all play an important role in the delivery of sustainable development.</p>	
33913	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>There is no mention of how Neighbourhood Planning integrates with Local Planning and can help climate change adaptation and/or community regeneration; yet adopted NPs are becoming a key part of the decision-making process.</p>
<p>Councils response:</p> <p>Comment noted. The SPD has been prepared to support policies in the adopted Cambridge and South Cambridgeshire Local Plan. While there is a role for Neighbourhood Plans in supporting the response to the climate emergency, it is considered that guidance in relation to this may sit better within a separate document developed for those preparing Neighbourhood Plans as opposed to a document intended to be utilised primarily by those preparing planning proposals.</p>	
33912	<p>(Object) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Section 3 aims to interpret policies drawn from adopted national, and local (city and district) plans with selected additions to further "sustainability"</p> <p>In consequence, the SPD will add a considerable administrative load to developers, builders and building owners at all planning, construction and operation stages.</p> <p>While admirable in theory, this increased regulation will make it even more difficult to maintain a 5-year supply of housing land and, although a material consideration (p23), like Village Design Statements and other advisory material, its importance will be seriously diminished.</p>
<p>Councils response:</p> <p>The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. The level of detailed guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications.</p>	
33898	<p>(Comment) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p>

	<p>Respondent: University of Cambridge (Miss Rochelle Duncan) [7309] Received: 23/9/2019 via Web</p> <p>We believe the economy of wording should be improved in the interests of overall clarity.</p>
<p>Councils response:</p> <p>The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. The level of detailed guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications.</p>	
33873	<p>(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Tom Bragg (Mr Tom Bragg) [1927] Received: 20/9/2019 via Web</p> <p>Cambridge Carbon Footprint supports the SPD, and anything further that can be done to reduce carbon emissions from the built environment under the current local plan, including:</p> <ul style="list-style-type: none"> a) resisting 'financial viability' exemptions b) strong enforcement to help ensure new homes actually meet the required standards <p>These would be steps towards a new local plan with much stronger carbon reduction policies, to make it in line with the Climate Act, as required by NPPF 2019.</p>
<p>Councils response:</p> <p>Support noted. Further work on Net Zero Carbon will be carried out as part of the development of the Greater Cambridge Local Plan, and the Councils have committed to introducing policies related to net zero carbon as part of this document. Further work is being commissioned to provide the evidence base for these policies, which will also consider whether elements of net zero carbon can be achieved ahead of the 2050 deadline set in the Climate Change Act. Additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.</p> <p>Change to the SPD:</p> <p>Insert new paragraph after 1.17 to read: <u>The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or</u></p>	

<p><u>lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.</u></p>	
33868	<p>(Support) Section 1: Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Carbon Neutral Cambridge (Ms Anne Miller) [7909] Received: 17/9/2019 via Web</p> <p>We support this SPD, with the proviso that this is the most that can be done under the current Local Plan, that there is strong enforcement of policies and much stronger carbon reduction policies are adopted in the forthcoming Local Plan, including a Zero Carbon Standard for new homes.</p>
<p>Councils response:</p> <p>Support noted. Further work on Net Zero Carbon will be carried out as part of the development of the Greater Cambridge Local Plan, and the Councils have committed to introducing policies related to net zero carbon as part of this document. Further work is being commissioned to provide the evidence base for these policies, which will also consider whether elements of net zero carbon can be achieved ahead of the 2050 deadline set in the Climate Change Act. Additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.</p> <p>Change to the SPD:</p> <p>Insert new paragraph after 1.17 to read: <u>The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.</u></p>	

Section 2: The Importance of Urban Design

34130	<p>(Object) Section 2: The importance of urban design, 2.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524]</p>
-------	--

	<p>Received: 23/9/2019 via Email</p> <p>It is considered that Policy 56 (Cambridge Local Plan) and Policy HQ1 (South Cambridgeshire Local Plan) already provide sufficient guidance on urban design matters relevant to sustainable design and construction. There is an adopted District Design Guide for South Cambridgeshire which relates to policies from the Development Control Policies DPD (2010); it is likely that the document will be updated to reflect adopted policies in the South Cambridgeshire Local Plan. In addition, Section ID. 26 of the Planning Practice Guidance provides comprehensive advice on design matters, including on accessibility, efficient use of resources and mix of uses within neighbourhoods for example. Therefore, it is unnecessary to duplicate existing design guidance in the draft SPD.</p>
	<p>Councils response:</p> <p>Section 2 has been included within the SPD as it is important to highlight that sustainable design and construction and urban design are mutually inclusive. The South Cambridgeshire District Design Guide was developed to support policies contained in the previous South Cambridgeshire Development Control Policies DPD, and as such does not apply to developments in Cambridge. As such it is considered appropriate for guidance to be updated and included in the Greater Cambridge SPD.</p> <p>The purpose of an SPD is not to write new policy but to provide interpretation of existing policies in the relevant Development Plan Documents (Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018).</p> <p>Section 2 of the SPD highlights how sustainable design and construction considerations can be embedded as part of the decision making process at the spatial and site planning stages of the development process. It is therefore appropriate for the SPD to identify how good urban design principles can help inform delivery of more sustainable forms of construction to include location, orientation, relationship to existing land uses and movement & access networks. These are all crucial considerations as we consider how to plan for low carbon communities and reduce energy demands and private motor vehicle trips.</p>
34107	<p>(Support) Section 2: The importance of urban design, 2.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688]</p> <p>Received: 23/9/2019 via Email</p> <p>The SPD gives the necessary priority to the importance of urban design and its role to establish a foundation and framework for the delivery of inherently sustainable places. The SPD correctly identifies the creation of walkable neighbourhoods; movement frameworks which support walking, cycling and public transport as the primary transport</p>

	<p>choice; the provision of and clustering of services and facilities; and the efficient use of land as key principles. U&C supports this position which is at the heart of its proposals for the development of Waterbeach Barracks. Of note, U&C particularly supports the recognition that sustainable development should be adaptable with the ability to accommodate change over time.</p>
<p>Councils response: Support noted.</p>	
34093	<p>(Support) Section 2: The importance of urban design, 2.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: John Preston [5295] Received: 23/9/2019 via Email Generally strong support, qualified by objection below.</p>
<p>Councils response: Support noted.</p>	
34052	<p>(Object) Section 2: The importance of urban design, 2.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email It is considered that Policy 56 (Cambridge Local Plan) and Policy HQ1 (South Cambridgeshire Local Plan) already provide sufficient guidance on urban design matters relevant to sustainable design and construction. There is an adopted District Design Guide for South Cambridgeshire which relates to policies from the Development Control Policies DPD (2010); it is likely that the document will be updated to reflect adopted policies in the South Cambridgeshire Local Plan. In addition, Section ID. 26 of the Planning Practice Guidance provides comprehensive advice on design matters, including on accessibility, efficient use of resources and mix of uses within neighbourhoods for example. Therefore, it is unnecessary to duplicate existing design guidance in the draft SPD.</p>
<p>Councils response: Section 2 has been included within the SPD as it is important to highlight that sustainable design and construction and urban design are mutually inclusive. The South Cambridgeshire District Design Guide was developed to support policies contained in the previous South Cambridgeshire Development Control Policies DPD, and as such does not apply to developments in Cambridge. As such it is considered appropriate for guidance to be updated and included in the Greater Cambridge SPD. The purpose of an SPD is not to write new policy but to provide interpretation</p>	

of existing policies in the relevant Development Plan Documents (Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018).

Section 2 of the SPD highlights how sustainable design and construction considerations can be embedded as part of the decision making process at the spatial and site planning stages of the development process. It is therefore appropriate for the SPD to identify how good urban design principles can help inform delivery of more sustainable forms of construction to include location, orientation, relationship to existing land uses and movement & access networks. These are all crucial considerations as we consider how to plan for low carbon communities and reduce energy demands and private motor vehicle trips.

**(Object) Section 2: The importance of urban design, 2.1
Introduction - Draft Greater Cambridge Sustainable Design and
Construction SPD - July 2019**

Agent: Carter Jonas (Mr Brian Flynn) [2200]

Respondent: **Axis Land Partnerships (Mr Andrew Adams) [7785]**

Received: **23/9/2019 via Email**

34011

It is considered that Policy 56 (Cambridge Local Plan) and Policy HQ1 (South Cambridgeshire Local Plan) already provide sufficient guidance on urban design matters relevant to sustainable design and construction. There is an adopted District Design Guide for South Cambridgeshire which relates to policies from the Development Control Policies DPD (2010). In addition, Section ID. 26 of the Planning Practice Guidance provides comprehensive advice on design matters. Therefore, it is unnecessary to duplicate existing design guidance in the draft SPD.

It is noted that Paragraph 2.3.9 of the draft SPD refers to a separate transport toolkit related to active travel is in the process of being prepared. It is considered that an additional toolkit is unnecessary, when adequate guidance on this issue already exists. A revamped Sustainability Statement could include criteria on active travel if required.

Requested Change

To delete Section 2, and refer to urban design matters within a revamped Sustainability Statement with reference to other documents providing urban design guidance relevant to sustainable design and construction.

Councils response:

Section 2 has been included within the SPD as it is important to highlight that sustainable design and construction and urban design are mutually inclusive. The South Cambridgeshire District Design Guide was developed to support policies contained in the previous South Cambridgeshire Development Control Policies DPD, and as such does not apply to developments in Cambridge. As such it is considered appropriate for guidance to be updated

and included in the Greater Cambridge SPD.

The purpose of an SPD is not to write new policy but to provide interpretation of existing policies in the relevant Development Plan Documents (Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018).

Section 2 of the SPD highlights how sustainable design and construction considerations can be embedded as part of the decision making process at the spatial and site planning stages of the development process. It is therefore appropriate for the SPD to identify how good urban design principles can help inform delivery of more sustainable forms of construction to include location, orientation, relationship to existing land uses and movement & access networks. These are all crucial considerations as we consider how to plan for low carbon communities and reduce energy demands and private motor vehicle trips.

33985	<p>(Support) Section 2: The importance of urban design, 2.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email</p> <p>We welcome objectives to achieve more sustainable development through design e.g. creating walkable neighbourhoods, creation of robust and adaptable places and buildings to address the effects of climate change and encouraging walking and cycling e.g. through the Greater Cambridge Greenways Plan.</p>
-------	--

Councils response:

Support noted.

33978	<p>(Comment) Section 2: The importance of urban design, 2.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email</p> <p>This section is really well written and if all developments took heed of this advice they would be much the better for it. This chapter is set out as an overall introduction rather than related to Policy, which seems to miss a trick. In fact it relates to Policy 5 of the Local Plan (strategic transport infrastructure), and could be included in Section 3 on Implementation related to that policy. Without this, the chances of enforcing implementation are slim, and the good work wasted. It would be better as part of section 3 'implementation'.</p>
-------	--

Councils response:

Support noted. The concerns related to implementation are noted, however the requirements set out in this section of the SPD have been integrated into the Sustainability Checklist to ensure that they are integrated into the design of all development proposals. However we will add a policy box to this section

similar to those contained within Section 3 in order to highlight the policy basis for this section of the SPD and set out the documents that should be submitted with planning proposals.

Change to the SPD:

Add a policy box to the start of this section of the SPD as follows:

LOCATION:	Cambridge and South Cambridgeshire
POLICY:	
SCALE OF DEVELOPMENT:	All scales (except householder)
TYPE OF DEVELOPMENT:	Residential and non-residential development
SUBMISSION REQUIREMENTS:	Design and Access Statement Transport Assessments
LINK TO THE SUSTAINABILITY CHECKLIST:	T.1, T.2, T.3, T.4, T.5, T.6

33910	<p>(Object) Section 2: The importance of urban design, 2.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Walkable neighbourhoods are a great idea in theory.</p> <p>However, they are almost impossible to achieve outside city centres - especially at a 400 metre scale.</p> <p>Cottenham's draft Neighbourhood Plan examined this in detail.</p> <p>As a pragmatic compromise, Cottenham's NP uses 800 metre distances from the centre and "focal points".</p> <p>We welcome efforts to extend segregated cycle networks which benefit some but are not a substitute for a range of transport solutions, including cars.</p> <p>Villages are unlikely ever to sustain a rich enough public transport infrastructure to eliminate the need for substantial use of private cars; e-infrastructure will help.</p>
-------	--

Councils response:
Comment noted. The SPD at page 24 paragraph 2.2.3 references both 400m and 800m walking catchments. The 800m is consistent with Cottenham's Neighbourhood Plan.

34108	(Object) Section 2: The importance of urban design, 2.2 Achieving
-------	--

	<p>more sustainable development forms - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>the general view that the design of buildings should seek to reduce energy demands is accepted, U&C question if a specific depth should be identified within the SPD. This approach would be too restrictive and discounts the range of suitable design to allow deeper floor plan buildings to be provided in the right circumstances, for example to respond to site constraints, occupier demands or other design requirements.</p>
	<p>Councils response:</p> <p>Concern noted however it is not the intention of the SPD to set specific requirements related to building depths but to highlight examples of the benefits of certain depths and the importance of responding to context when designing buildings to ensure that they protect and enhance the character of the area in which they are located. It is recognised that other factors will impact on the design of buildings, but it is important that this does not lead to proposals that are inappropriate for their context.</p> <p>The SPD at page 28 paragraph 2.2.22 says 'it is generally acknowledged that 9m to 13m creates the most robust and adaptable form'. This is not prescriptive of what will be allowed for all new buildings but identifies that deeper plan buildings become more challenging for future adaptation. Beyond 13m it also becomes more challenging to achieve good natural daylighting which increases energy demands. However, for clarity, the final sentence of this paragraph will be amended.</p> <p>Change to the SPD:</p> <p>Amend the wording of the final sentence of paragraph 2.2.22 to read: In terms of optimum depths of buildings, it is generally acknowledged that <u>a depth of between</u> 9 to 13m creates the most robust and adaptable form.</p>
34095	<p>(Comment) Section 2: The importance of urban design, 2.2 Achieving more sustainable development forms - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <ol style="list-style-type: none"> 1) 2.2.17 support "layering" of mixed uses. 2) 2.2.18-20 strongly support requirements for buildings to be adaptable. 3) promote re-use of building components and materials
	<p>Councils response:</p>

Support noted.	
34080	<p>(Comment) Section 2: The importance of urban design, 2.2 Achieving more sustainable development forms - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033]</p> <p>Received: 23/9/2019 via Email</p> <p>2.2.10 'Density will need to respond to the constraints and opportunities that exist' - residents say the plans for density should be about creating communities and streets, not high rises or Trump Towers and should also support biodiversity and wildlife corridors. The back gardens of the city's terraced houses are important wildlife corridors.</p>
<p>Councils response:</p> <p>Comment noted. Further guidance on tall buildings is contained within Appendix F of the Cambridge Local Plan, which supports Policy 60 (Tall Buildings and the Skyline in Cambridge). The role of back gardens in supporting biodiversity is recognised by Policy 53 of the Cambridge Local Plan.</p>	
34079	<p>(Comment) Section 2: The importance of urban design, 2.2 Achieving more sustainable development forms - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033]</p> <p>Received: 23/9/2019 via Email</p> <p>2.24 Walkable neighbourhoods</p> <p>Proposal should undertake a comprehensive analysis. The inspirational town planner and architect Jan Gehl has said: I think we haven't thought through the challenge of technology for city mobility. We are stuck with some 120-year-old ideas that the industry is desperately holding on to. I tell students: Whenever you hear the word "smart," beware, because that is somebody who wants to sell as many millions as possible of some new gimmick. And he is not necessarily giving you a better quality of life. Gehl advocates that to build communities that work well where people, not cars, occupy the pavement, the evidence needs to be shown and capacity issues need to be addressed. Count all the pedestrians, cyclists, strollers, and café loungers going by, just as highway planners have long tallied up road users in vehicles. This is something that residents groups tell us they are well placed to do.</p>
<p>Councils response:</p> <p>Comment noted. The basis of successful 'walkable' compact and vital neighbourhoods is about achieving excellent connectivity for pedestrians and cycles along with first and last mile strategies for deliveries end 'end to end journey planning'.</p>	

33976	<p>(Comment) Section 2: The importance of urban design, 2.2 Achieving more sustainable development forms - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email</p> <p>Robust and adaptable places and buildings</p> <p>2.2.18 This can only be possible by making a requirement for any development to go beyond the current targets. It requires acting now - to ensure that any current stock being built over the next two/five years takes on board this measures immediately (given that there are 33 thousand new homes currently proposed for Cambridgeshire)</p>
<p>Councils response:</p> <p>Concerns noted. Additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.</p> <p>Change to the SPD:</p> <p>Insert new paragraph after 1.17 to read: <u>The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.</u></p>	
33911	<p>(Object) Section 2: The importance of urban design, 2.2 Achieving more sustainable development forms - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>SCDC's AQMAs are centred on the A14 and its interchanges which are being radically re-engineered currently to remove the congestion and associated air pollution..</p> <p>Few of SCDC's villages can support a "good" bus service based on 100 people per hectare unless they are suburbs adjacent to the city boundary and have young family populations. They are too far separated for residents to rely on cycling and walking.</p> <p>Improvements to e-infrastructure are vital to the "5-miles from everywhere" villages, like Cottenham, Willingham etc. that are beyond comfortable walking and cycling distance of neighbouring communities for most residents.</p>

Councils response:
 Our understanding is that 100 people per hectare is for unsubsidised bus services. Many in rural communities are subsidised. The Greater Cambridge Partnership are leading on looking at ways to improve connectivity from Cambridge's rural hinterlands including improved public transport and introducing 'greenways' to improve pedestrian and cycle connectivity. Effective 'end to end' journey planning is key to achieving more sustainable movement patterns in the Greater Cambridge region and beyond. Private cars can form part of an overall solution with effective and easy modal change facilitated.

33908	<p>(Object) Section 2: The importance of urban design, 2.2 Achieving more sustainable development forms - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>SCDC's AQMAs are centred on the A14 and its interchanges which are being radically re-engineered currently to remove the congestion and associated air pollution..</p> <p>Few of SCDC's villages can support a "good" bus service based on 100 people per hectare unless they are suburbs adjacent to the city boundary and have young family populations. They are too far separated for residents to rely on cycling and walking.</p> <p>Improvements to e-infrastructure are vital to the "5-miles from everywhere" villages, like Cottenham, Willingham etc. that are beyond comfortable walking and cycling distance of neighbouring communities for most.</p> <p>Too Cambridge city centre.</p>
-------	--

Councils response:
 Our understanding is that 100 people per hectare is for unsubsidised bus services. Many in rural communities are subsidised. The Greater Cambridge Partnership are leading on looking at ways to improve connectivity from Cambridge's rural hinterlands including improved public transport and introducing 'greenways' to improve pedestrian and cycle connectivity. Effective 'end to end' journey planning is key to achieving more sustainable movement patterns in the Greater Cambridge region and beyond. Private cars can form part of an overall solution with effective and easy modal change facilitated.

34131	<p>(Object) Section 2: The importance of urban design, 2.3 Transport, Movement and Accessibility - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524]</p>
-------	---

	<p>Received: 23/9/2019 via Email</p> <p>It is noted that Paragraph 2.3.9 of the draft SPD refers to a separate transport toolkit related to active travel is in the process of being prepared. It is considered that an additional toolkit is unnecessary, when adequate guidance on this issue already exists. A revamped Sustainability Statement could include criteria on active travel if required.</p>
<p>Councils response:</p> <p>Comment noted. The toolkit is being developed in direct response to the experience of major new developments where the take up of active travel could be bolstered by the provision of guidance. As the toolkit is not yet available, it is not possible to include it within the Sustainability Checklist.</p>	
34110	<p>(Comment) Section 2: The importance of urban design, 2.3 Transport, Movement and Accessibility - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>U&C recognises the governments objective for the transition to zero emission vehicles. It agrees that given the long timeframe for the delivery of large-scale development that it is sensible to plan for this trend. However, whilst sales of new petrol and diesel cars will end by 2040, given the longevity of car ownership, it is not likely to be the case that there will be no such vehicles by 2050.</p> <p>U&C fully supports the creation of connected and walkable places to reduce the reliance upon private car movements and the need to transition to zero emission vehicles but it is likely that private vehicular movements will still exist be a part of the modal share for residents of new developments. For this reason, the SPD should allow for the consideration should be given to accommodating this type of movement through the design of streets, homes and buildings and within the design of the public realm.</p>
<p>Councils response:</p> <p>Comments noted. 'End to end journey planning' for both public transport and private cars is needed.</p>	
34109	<p>(Support) Section 2: The importance of urban design, 2.3 Transport, Movement and Accessibility - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>U&C agrees that the planning of new development will have a key role in facilitating the transition towards lowering the carbon demands generated by transport and reducing carbon emissions in Greater Cambridgeshire. U&C supports the adoption of a strategic approach to</p>

	<p>transport infrastructure delivery principally to ensure that major growth locations are connected to key destinations by high quality public transport services. This, alongside the principles for good urban design described within the SPD (such as the creation of walkable neighbourhoods and permeable movement frameworks), is critical to establishing sustainable transport patterns within new communities at the outset and therefore, reducing a reliance upon private vehicular travel. In this context, U&C supports the identification of the measures within Table 2.1 to meet sustainable transport objectives.</p>
<p>Councils response: Support noted.</p>	
34094	<p>(Object) Section 2: The importance of urban design, 2.3 Transport, Movement and Accessibility - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>2.3.3 and 2.3.4 do not recognise the very serious capacity, and hence sustainability, challenges, notably in the historic core of Cambridge, arising from current and future growth coupled with modal shift being promoted by the GCP.</p> <p>Similar capacity and sustainability issues are raised by competing demands on the Market Square. How will the Councils ensure that the principles of this SPD are applied to, and delivered in, their own projects and those by the GCP?</p> <p>Capacity, sustainability, and the exemplar role of public authorities need to be addressed in the SPD.</p>
<p>Councils response: Concerns noted. All applications for planning permission in Cambridge will be subject to the same planning policies as set out in the adopted Cambridge Local Plan. The comments related to public sector projects acting as exemplars is noted and welcomed. However, it is not the role of the SPD, which is a planning document that will be applied to all development proposals, to set specific requirements for corporate projects. This is an approach that is better dealt with by the way of corporate policy documents such as Climate Change Strategies and Housing Specifications.</p> <p>City Centre capacity and the impact on the Historic Core are part of the role and remit of the 'Making Space for People' SPD that is currently in progress. The reallocation of space and prioritising sustainable modes is part of creating a liveable city and managing the pressure on the historic core and outlying areas.</p>	
34053	<p>(Object) Section 2: The importance of urban design, 2.3</p>

	<p>Transport, Movement and Accessibility - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>It is noted that Paragraph 2.3.9 of the draft SPD refers to a separate transport toolkit related to active travel is in the process of being prepared. It is considered that an additional toolkit is unnecessary, when adequate guidance on this issue already exists. A revamped Sustainability Statement could include criteria on active travel if required.</p>
<p>Councils response:</p> <p>Comment noted. The toolkit is being developed in direct response to the experience of major new developments where the take up of active travel could be bolstered by the provision of guidance. As the toolkit is not yet available, it is not possible to include it within the Sustainability Checklist.</p>	
34026	<p>(Comment) Section 2: The importance of urban design, 2.3 Transport, Movement and Accessibility - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: No. 6 Developments (Mr Richard Oakley) [8140] Respondent: Cambridge University Hospital NHS Foundation Trust (Carin Charlton) [8141] Received: 23/9/2019 via Email</p> <p>Many of the aspirations set out in this section of the SPD will not be suitable or achievable at the hospital campus. Whilst committed to maximising the opportunities for sustainable modes of transport the specific needs of CUH and the CBC needs to be looked at as a whole and not on a building by building basis - a principle agreed under the original outline approval for the CBC.</p>
<p>Councils response:</p> <p>Comment noted. Where proposals for the Addenbrookes site and the CBC relate to existing outline permissions, reserved matters applications will be expected to respond to the requirements set out in those outline permissions.</p>	
33926	<p>(Comment) Section 2: The importance of urban design, 2.3 Transport, Movement and Accessibility - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mr . Wookey [3642] Received: 23/9/2019 via Web</p> <p>Making cycling and walking _more_ convenient than driving is vital to modal shift.</p> <p>This SPD must also insist that cycle and pedestrian routes are completed _before_ first occupation so new residents actually get a real choice of travel mode. This has not been done on numerous previous developments.</p>

Councils response:	
High level guidance – further detail in documents prepared by Cambridgeshire County Council in their role as Highways Authority. Some aspects will be addressed in Active Transport Toolkit referenced in the SPD that is currently being developed by South Cambridgeshire District Council.	
33909	<p>(Comment) Section 2: The importance of urban design, 2.3 Transport, Movement and Accessibility - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: University of Cambridge (Miss Rochelle Duncan) [7309]</p> <p>Received: 23/9/2019 via Web</p> <p>These representations are made on behalf of the Chancellors, Masters and Scholars of the University of Cambridge ("University of Cambridge").</p> <p>Paragraph 2.3.7 makes reference to 'Off-gauge bikes', which is not a widely recognised term. We assume that the term describes cargo, trailer and 3 wheeled bikes and ask that this be clarified.</p>
Councils response:	
Comment noted. Off-gauge bikes is a term used to denote cargo bikes and further clarification will be added to this paragraph of the SPD.	
Change to the SPD:	
Add the following to the final sentence of paragraph 2.3.7	
Other measures such as car clubs and <u>provision for off-gauge bikes such as cargo bikes, bikes with trailers and 3 wheeled bikes</u> will be necessary to minimise overspill parking in neighbouring communities.	
33853	<p>(Comment) Section 2: The importance of urban design, 2.3 Transport, Movement and Accessibility - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Hugh Venables [7669]</p> <p>Received: 16/7/2019 via Web</p> <p>Bike lanes must be fully on road or fully off road, not just a con to create extra parking spaces.</p>
Councils response:	
Comment noted.	

Section 3: Policy Implementation – Introduction

11	<p>(Support) Section 3: Policy Implementation, 3.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143]</p> <p>Respondent: Urban&Civic Ltd [5688]</p>
----	---

	<p>Received: 23/9/2019 via Email</p> <p>The SPD recognises that it is necessary that the requirements of the SPD are achievable and viable within the context of the range of demands placed upon development projects. U&C agrees that it is important that the Councils and developers engage early to consider and agree options for achieving sustainability policies and objectives.</p>
<p>Councils response:</p> <p>Support noted.</p>	
34096	<p>(Support) Section 3: Policy Implementation, 3.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>generally strong support for section 3, notably 3.2.2-8, 3.2.14, 3.2.17-18, 3.2.28, 3.2.32 qualified by the concerns and objections below.</p>
<p>Councils response:</p> <p>Support noted.</p>	
33986	<p>(Support) Section 3: Policy Implementation, 3.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email</p> <p>Sub-sections 3.2 - 3.11 set out topic based policy guidance and requirements including energy and carbon reduction, climate change adaptation, biodiversity, pollution, sustainable drainage systems and flood risk. Natural England is generally supportive of these requirements which will be implemented through the submission of appropriate documents such as Sustainability Statements.</p>
<p>Councils response:</p> <p>Support noted.</p>	
33940	<p>(Comment) Section 3: Policy Implementation, 3.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cambridge Past, Present & Future (Mr James Littlewood) [8127] Received: 23/9/2019 via Email</p> <p>There is no mention of communications connections to properties. There should be super-fast fibre connections to all properties to encourage home working and reduce the need to travel. To be installed in pipework so the fibre can be upgraded as technology develops.</p>
<p>Councils response:</p>	

Comment noted. Policy TI/10 (Broadband) in the South Cambridgeshire Local Plan and 42 (Connecting new development to digital infrastructure) require provision to be made for high capacity broadband in new developments to help facilitate increased home working.

(Comment) Section 3: Policy Implementation, 3.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019

Respondent: **Cambridge Past, Present & Future (Mr James Littlewood) [8127]**

Received: **23/9/2019 via Email**

33936 While we understand that the SPD relates to delivery of adopted policies, we would like the SPD to set some aspirational targets which developers could strive for, which are beyond the requirements set out in the local Plans. For example water efficiency - we would like the SPD to challenge developers in South Cambs to reach the same levels of water efficiency required for the City. And on biodiversity can developers be encouraged to address the biodiversity emergency and Natural Cambridgeshire's vision of doubling nature by 2050?

Councils response:

The desire for a greater level of ambition is noted and welcomed. Existing adopted policy requirements tend to be set as a minimum and where possible developers are encouraged to exceed these requirements as part of pre-application discussions. However, Supplementary Planning Documents cannot be used to set new policy requirements, and as such the Greater Cambridge Sustainable Design and Construction SPD must focus on providing guidance on the implementation of existing policy, which was developed prior to announcements related to net zero carbon. Further work on Net Zero Carbon, Water Efficiency and Biodiversity will be carried out as part of the development of the Greater Cambridge Local Plan. Further work is being commissioned to provide the evidence base for these policies.

Additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.

Change to the SPD

Insert new paragraph after 1.17 to read:

The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting

systems without incurring the significant expense of an interior retrofit.

33907	<p>(Object) Section 3: Policy Implementation, 3.1 Introduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>We live in turbulent times. Desktop considerations of viability may not be enough to ensure that Greater Cambridge continues to attract developers in sufficient quantities to ensure an adequate supply of housing.</p> <p>A cooling in housing demand led by reduced economic migration and immigration, market-pricing and constraints on capital or interest rates may lead to developers focusing their resources elsewhere, rendering absolute measures of viability unsustainable.</p>
-------	--

Councils response:

Concern noted. With regards to the planning process, the councils are bound by the definition of viability as set out in the National Planning Policy Framework and associated guidance provided by the Planning Practice Guidance. The policy requirements set out in the adopted Local Plans have been subject to viability testing and have been found to be viable.

Section 3.2: Energy and carbon reduction

34132	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>Policies 28 and 30 of the Cambridge Local Plan and Policy CC/3 of the South Cambridgeshire Local Plan and the associated supporting text provide simple and concise requirements to demonstrate energy and carbon reduction in development. It is considered that Section 3.2 is confusing, and as such could be written in a much clearer and simpler format to assist potential users of the draft SPD. It is suggested that revised versions of Tables 3.3 and 3.4 should be prepared to explain in a simple format all of the policy and document requirements of Policies 28, 30 and CC/3; Table 3.3 and 3.4 current relate to the South Cambridgeshire Local Plan but could be adapted for the Cambridge Local Plan policies.</p> <p>It is considered that there is some overlap in the information that is required to meet planning policies and that which would be required to meet Building Regulations.</p>
-------	---

Councils response:	
Section 3.2 has been adapted from guidance contained in the 2007 Cambridge Sustainable Design and Construction SPD and guidance for the implementation of the carbon reduction requirements of the Code for Sustainable Homes, which has also been in use since 2007. As such, this guidance is well understood by Sustainability and Mechanical Engineering Consultants that would normally prepare Energy and Carbon reduction Statements as part of planning applications.	
34113	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>U&C supports localised combined heat and power options in appropriate circumstances i.e. where economically viable, technically feasible and where there is a critical demand. However, U&C notes that the SPD supports gas fired CHP as a low carbon technology which can contribute towards the achievement of the 10% reduction in carbon emissions policy requirement. U&C does not agree that gas fired CHP should be considered as a low carbon technology as in most cases, this leads to a net increase in emissions compared to a standard gas boiler. On this basis, it is suggested the SPD should set out its support for this option in comparison to the wider range of genuine low carbon technology options available.</p>
Councils response:	
Concern noted. It is recognised that with increasing decarbonisation of the grid, the carbon reductions associated with the use of gas CHP will be impacted and that the actual carbon reductions associated with the use of this technology are very much dependent on correct specification, installation and operation of the technology. However, it is considered that where applied correctly, gas fired CHP still has a role to play and it can also help to support the development of heat networks, which would allow for a wide range of renewable heat technologies to be utilised in the future. As such, the SPD will be amended to indicate that this technology can only be used where the carbon reductions can be shown to exceed the 10% requirement and that systems are designed in line with the CIBSE/ADE Code of Practice for Heat Networks.	
Change to the SPD:	
Amend the first sentence of paragraph 3.2.29 to read:	
<u>Correctly specified gas fired CHP is can be considered a low carbon technology and as such can be counted towards the 10% requirement considered as an approach to meeting the requirements of policy CC/3. Evidence will need to be provided to demonstrate that the system has been</u>	

designed in line with the latest best practice guidance (see paragraph 2.3.32 below) and the levels of carbon reduction associated with the use of the technology can be demonstrated to exceed the requirements of policy CC/3. In some cases, post occupancy evaluation may be required to verify carbon performance.

Amend the Penultimate sentence of paragraph 2.3.32 to read:

As such, the Council ~~would recommend~~ will require evidence that any proposals for heat networks, regardless of whether these are powered by CHP or another technology, ~~are have been~~ designed in line with the CIBSE/ADE Guide CP1: Heat Networks Code of Practice for the UK (2015) or a successor document.

34112	<p>(Support) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>U&C supports the requirement of Policy CC/3 of the South Cambridgeshire Local Plan for at least a 10% reduction in carbon emissions associated with energy use from a development. U&C's ambition for the delivery of the Waterbeach Barracks site is to exceed the minimum requirement by incorporating on-site or near-site renewable or low carbon technology.</p> <p>U&C is committed to continuing to work in partnership with the Council to agree the measures which will deliver this this ambition at each Key Phase of the Waterbeach Barracks development. In this context, U&C welcomes the approach suggested in the SPD to early engagement and discussion of the best options and technologies.</p>
-------	--

Councils response:
 Support noted.

34103	<p>(Comment) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>3.2.6 is very important: how will it be enforced?</p>
-------	--

Councils response:
 The Carbon Reduction Statement will need to be submitted as part of the planning application for sites. As the document forms part of the authorities Local List, failure to supply this documentation could lead to delays in applications being validated or could lead to officers recommending refusal of

proposals due to insufficient evidence to demonstrate compliance with adopted policy.	
34102	<p>(Comment) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>3.2.17 line 6 does not make sense.</p>
<p>Councils response:</p> <p>Comment noted. This sentence will be amended to provide clarification.</p> <p>Change to the SPD:</p> <p>Amend the penultimate sentence of paragraph 3.2.17 to read: Early consideration also enables to applicant to weigh up the potential advantage of increasing the energy efficiency, or be lean stage of the design of their development in order to reduce the size of the 10% requirement.</p>	
34097	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>Paras 3.2.1 - 12 , Policy 28 and Fig 3.1 do not recognise the very serious implementation challenges arising from performance gaps, industry competence issues, skills gaps etc.</p> <p>Para 3.2.9. does not consider solid wall buildings (up to 25% of existing stock)</p> <p>Paras 3.2.9 -11 and table 3.2 do not mention current Government retrofit guidance (PAS 2035: 2019), or the need to cross reference Building Regulations Part L1B and L2B.</p> <p>Para 3.2.13 does not mention PAS 2035, the Government's guides to Landlords in the Private Rented Sector, or key STBA publications ("Planning Responsible Retrofit" and "What is Whole House Retrofit" - see stbauk.org), all of which encourage a whole building approach. Nor does it mention the STBA's Guidance Wheel (http://responsible-retrofit.org/wheel/) which assists selection of appropriate measures, or combinations of measures, to suit individual buildings.</p> <p>Para 3.2.15 covers carbon emissions in use only. Should cover whole life cycle.</p>
<p>Councils response:</p> <p>While the implications of the Performance Gap are noted, and are a concern, it is considered that this is not something that can be addressed through the SPD, which can only provide guidance on the implementation of existing policy. The performance gap is a national issue and as such requires change to national policy in order to address the issue. Further consideration will be</p>	

given to this issue as part of work on the Greater Cambridge Local Plan.

With regards to solid wall buildings, the insulation of solid wall properties is not covered in policy 30 as the focus is on the implementation of cost effective measures with a simple pay back of seven years or less. At present, solid wall insulation does not fall within this pay back period.

With regards to the additional guidance information that is available and the need to cross reference Building Regulations, these elements will be added to the SPD in so far as they relate to existing dwellings.

Regarding the need to cover whole life cycle emissions as part of the implementation of policy CC/3 of the South Cambridgeshire Local Plan, this policy only considers regulated emissions. The SPD cannot amend the requirements of this policy. However, consideration of whole life cycle emissions will be considered as part of work on the Greater Cambridge Local Plan and work on net zero carbon.

Change to the SPD

Amend the guidance provided under paragraph 3.2.13 to include reference to the following documents:

- BSI (2019). PAS 2035/2030: 2019. Retrofitting dwellings for improved energy efficiency. Specification and guidance. Specification for the installation of energy efficiency measures in existing dwellings and insulation in residential park homes. Available online at: https://shop.bsigroup.com/ProductDetail/?pid=000000000030390699&_ga=2.47214575.996413101.1561645187-1834974640.1559206354
- Guidance for landlords of domestic private rented property is available online at: <https://www.gov.uk/guidance/domestic-private-rented-property-minimum-energy-efficiency-standard-landlord-guidance>
- Sustainable Traditional Buildings Alliance (2015). Planning responsible retrofit of traditional buildings. Available online at: <http://www.sdfoundation.org.uk/downloads/Guide-1-Planning-Responsible-Retrofit-2015-08.pdf>
- Sustainable Traditional Buildings Alliance Responsible Retrofit Guidance Wheel. Available online at: <http://www.responsible-retrofit.org/wheel/>
- Sustainable traditional Buildings Alliance (2016). What is whole house retrofit. Available online at: <http://www.sdfoundation.org.uk/downloads/What-is-Whole-House-Retrofit-Dec2016.pdf>
- Building Regulations Approved Document L1B: Conservation of fuel and power in existing dwellings. Available online at: https://www.planningportal.co.uk/info/200135/approved_documents/74/part-1-conservation-of-fuel-and-power/2

34081	<p>(Support) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033] Received: 23/9/2019 via Email</p> <p>3.2 Carbon Reduction Policy There is support for the Carbon Reduction Policy- pp 36 -44 of the draft SPD. Indeed some of our members are telling us they would like to see this policy strengthened and to have zero carbon standard in the next Local Plan.</p> <p>3.4 Support for a Legal duty for Local Plan to be in line with requirements of Climate Act. Members cite the recent letter sent by Client Earth to Local Authorities preparing a Local Plan. See attached letter to Cambridge City Council Executive Councillor for Planning.</p> <p>Support the energy hierarchy idea pp 36 -7, 147 Developers should be required to get the fabric energy efficiency right from the start. People say this seems a very sensible requirement.</p> <p>Support for Policy 30 of the Local Plan that requires some very reasonable energy efficiency improvements if you build an extension (p 40) Residents say this seems sensible</p>
<p>Councils response:</p> <p>Support noted. With regards to the letter received from Client Earth, these issues will be addressed as part of the development of the Greater Cambridge Local Plan. Additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.</p> <p>Change to the SPD</p> <p>Insert new paragraph after 1.17 to read: <u>The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.</u></p>	

34073	<p>(Comment) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: South Cambridgeshire District Council (Mr Nick Lockley) [8142] Received: 23/9/2019 via Email</p> <p>3.2.2 The draft SPD sets out key areas for energy efficiency and carbon reduction which will be implemented at the planning stage. While the SPD sets out minimum standards such as 44% emissions reduction, there is an opportunity for the New Build Team to go above the minimum standards by requesting developers add further carbon reduction features or higher specification products- decisions on the upgrade could be taken on a scheme by scheme basis but will need the necessary approvals as there will be an additional development cost to consider.</p>
<p>Councils response: Comment noted.</p>	
34054	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>It is considered that Section 3.2 is confusing, and as such could be written in a much clearer and simpler format to assist potential users of the draft SPD. It is suggested that revised versions of Tables 3.3 and 3.4 should be prepared to explain in a simple format all of the policy and document requirements of Policies 28, 30 and CC/3; Table 3.3 and 3.4 current relate to the South Cambridgeshire Local Plan but could be adapted for the Cambridge Local Plan policies.</p> <p>Requested Change To rewrite Section 3.2 in a clearer and simpler format using adapted versions of Tables 3.3 and 3.4 as an appropriate approach. To require identical information on energy and carbon reduction measures for both Building Regulations and planning application processes.</p>
<p>Councils response: Section 3.2 has been adapted from guidance contained in the 2007 Cambridge Sustainable Design and Construction SPD and guidance for the implementation of the carbon reduction requirements of the Code for Sustainable Homes, which has also been in use since 2007. As such, this guidance is well understood by Sustainability and Mechanical Engineering Consultants that would normally prepare Energy and Carbon reduction Statements as part of planning applications.</p>	
34040	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and</p>

	<p>Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email</p> <p>Table 3.4 sets out the calculation requirements for new development which includes a requirement for assessing all on-site requirements such as lighting of car parks, street lighting, heating and lighting of communal areas are included in calculations. This requirement conflicts with the baseline calculation requirements set out on Page 45 and is not contained within Policy CC/3. It is considered this requirement goes beyond the requirements of Policy CC/3 and is therefore unsound. While those elements are noted as being an important part of development, it may be that this is not the responsibility of the application, it is considered this requirement is not appropriate and should be removed, replaced with text to support the installation of low energy street and car park lighting.</p>
	<p>Councils response:</p> <p>Comment noted. It is noted that the requirements of policy CC/3 relate to regulated emissions only and as such reference to other onsite requirements will be removed from Table 3.4 and Table 3.3.</p> <p>Change to the SPD:</p> <p>Amend Table 3.4 to remove reference to all other on-site energy requirements (i.e. remove the second row of this table).</p> <p>Amend Table 3.3 to remove references to all other on-site energy requirements</p>
34039	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email</p> <p>Paragraph 3.2.14 sets out the requirements of Local Plan Policy CC/3 requiring development to achieve a 10% reduction in carbon emissions. Countryside request that this paragraph and requirement be amended, as below, to include provision for development to achieve the potential carbon reduction requirements of any updated Building Regulations in the future. "Criterion 1 of policy CC/3 is a Merton rule style policy that seeks at least a 10% reduction in carbon emissions associated with regulated energy use from development. This is calculated using</p>

	<p>the baseline for the building as defined by the Building Regulations. Development should take into account updates the Government guidance and future iterations of the Building Regulations in respect of carbon reduction targets."</p>
<p>Councils response:</p> <p>While the SPD cannot be used to amend the requirements of policy CC/3, it is noted that changes to Part L of the Building Regulations may alter the way in which the policy is implemented in the future. As the extent of changes to Part L, and the implications that this may have are not yet fully known, it is suggested that wording be included in the introduction of the SPD in relation to future iterations of Building Regulations and the possible need for further technical advice notes to be produced to support policy implementation once the implications of these changes are fully understood.</p> <p>Change to the SPD:</p> <p>Insert a new paragraph after 3.1.2 to read:</p> <p><u>3.1.3 It is recognised that this SPD has been produced at a time of changing national policy, particularly in relation to carbon reduction from new development and measures to support electric vehicles. Changes to Building Regulations may have implications for the implementation of adopted policies in the Cambridge and South Cambridgeshire local plans. In light of this, further technical guidance on the implementation of affected policies may be produced once such changes are brought in.</u></p>	
34038	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email</p> <p>in the context of the propose Future Homes Standard it is anticipated that the carbon reduction requirements of the Building Regulations will be updated. In this context it is recommended that paragraph 3.2.5 and requirement be amended, as below, to include provision for development to achieve the potential carbon reduction requirements of any updated Building Regulations in the future to ensure the requirements are adaptable for the future. "For all new residential development, the current requirement is for a 19% reduction in carbon emissions compared to the current Building Regulations Part L 2013 compliant baseline. Development should take into account updates the Government guidance and future iterations of the Building Regulations in respect of carbon reduction targets."</p>
<p>Councils response:</p> <p>While the SPD cannot be used to amend the requirements of policy 28, it is noted that changes to Part L of the Building Regulations may alter the way in</p>	

which the policy is implemented in the future. As the extent of changes to Part L, and the implications that this may have are not yet fully known, it is suggested that wording be included in the introduction of the SPD in relation to future iterations of Building Regulations and the possible need for further technical advice notes to be produced to support policy implementation once the implications of these changes are fully understood.

Change to the SPD:

Insert a new paragraph after 3.1.2 to read:

3.1.3 It is recognised that this SPD has been produced at a time of changing national policy, particularly in relation to carbon reduction from new development and measures to support electric vehicles. Changes to Building Regulations may have implications for the implementation of adopted policies in the Cambridge and South Cambridgeshire local plans. In light of this, further technical guidance on the implementation of affected policies may be produced once such changes are brought in.

34037	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email</p> <p>Table 3.1 notes that the 19% carbon reduction above Part L 2013 should be applied to all homes. While flexibility is noted in the application of this policy to apartments similarly there may be technical constraints to the reduction of carbon emissions in individual homes, i.e. through orientation or shading defined by the nature of the site. To ensure the policy is sound and deliverable Countryside request that the 19% carbon reduction be delivered across the development as opposed to individual buildings to ensure the objective of the Policy is met. It is noted this is the approach applied to development in South Cambridgeshire on Page 45.</p>
-------	---

Councils response:

The implementation of the carbon reduction requirements for homes set out in policy 28 follows the methodology developed for the implementation of Ene01 of the Code for Sustainable Homes, given that this policy requirement stems from the Code. Many development sites across Cambridge have already met the energy requirements associated with Code Level 4, and as such there seems to be little evidence that this requirement cannot be met in the way envisaged by the guidance in the SPD. This methodology does allow for block compliance to be used for apartments and terraced housing, but does not allow for compliance to be averaged out across sites. In order for new development to play its role in meeting the UK's legally binding targets related to climate change and carbon reduction, carbon reduction measures need to be applied to all units. This policy was tested as part of the Councils viability

work and was found to be viable. The implementation of policy 28 is different to that of the South Cambridgeshire policy, which only relates to renewable and low carbon energy provision. Given that there is some flexibility in the Ene01 methodology and given the wording regarding technical feasibility contained within paragraphs 3.1.3 and 3.1.4 of the SPD, it is not considered necessary or appropriate to amend the methodology any further. Any deviation from this approach will be considered on a case by case basis as part of the pre-application process.

34036	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email</p> <p>Paragraph 3.2.5 sets out the requirements of Policy 28 which includes a requirement for a 44% reduction in carbon emissions compared to the 2006 Building Regulations. While it is appreciated this is part of the original basis for the Policy this is now significantly out of date. It is recommended reference to this is removed as is the reference to the Code for Sustainable Homes. The PPG now includes confirmation that Local Authorities can request a 19% reduction in carbon emissions above Part L 2013 as noted.</p>
-------	--

Councils response:

Concern noted. The wording of policy 28 references the requirement of a 44% reduction in emissions compared to Part L 2006, which is a reflection of when the policy wording was drafted. The SPD seeks to provide clarification that this now relates to a 19% improvement on Part L 2013 as it is noted that the 44% requirement is now out of date. While the SPD cannot make changes to the wording of policy 28, the wording of paragraphs 3.2.2 and 3.2.5 will be reviewed to provide clarification that applicants should be applying a 19% reduction on Part L 2013.

Change to the SPD:

Amend the wording of the second sentence of paragraph 3.2.2 to read:
Policy 28, as drafted in 2011, requires All new residential development is required to reduce emissions by 44% compared to a Building Regulations 2006 baseline (equivalent to a 19% reduction on Part L 2013). Under Part L 2013, this policy requirement is now equivalent to a 19% reduction in Part L 2013, which is the level of carbon reduction that must be demonstrated as a minimum in submitted Carbon Reduction Statements. The SPD shall hereafter refer to a 19% reduction on Part L 2013.

Amend the wording of paragraph 3.2.5 to read:
 For all new residential development, the requirement is for a 44% reduction in

~~carbon emissions compared to a Building Regulations Part L 2006 compliant baseline. For schemes utilising Building Regulations Part L 2013, this is equivalent to a 19% reduction on a Part L compliant baseline. This is equivalent to meeting the energy requirements of level 4 of the now withdrawn Code for Sustainable Homes, and the implementation of this policy follows the methodology for assessing this requirement.~~

(Comment) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019

Agent: No. 6 Developments (Mr Richard Oakley) [8140]

Respondent: **Cambridge University Hospital NHS Foundation Trust (Carin Charlton) [8141]**

Received: **23/9/2019 via Email**

34027

The Cambridge and South Cambridgeshire requirements related to energy are considered to be aimed at 'typical' non-residential development. Guidance in the SPD should acknowledge site specific circumstances where an alternative approach may be required. The standards set out in the Local Plans and SPD can be more difficult to achieve when implementing more short term solutions through modifications and extensions to existing hospital buildings and when connecting to existing energy infrastructure than for the creation of new buildings and infrastructure.

Opportunities may also exist to spend limited budgets more wisely to achieve more significant reductions in energy demand. The SPD in its current draft does not provide any further guidance for non-typical uses such as a hospital. As such, we encourage the Council to identify in the SPD circumstances where exceptions from the standards may be permissible, or to signpost alternative approaches which may be acceptable, including off-setting by implementing alternative solutions as part of a wider portfolio of buildings and infrastructure.

Councils response:

The requirements set out in the Cambridge and South Cambridgeshire Local Plans replicate construction standards that have already been delivered as part of the ongoing development of the Addenbrookes site and the wider development of the Cambridge Biomedical Campus. For example, the Papworth Hospital site has achieved BREEAM excellent. The SPD already sets out consideration will be given to the feasibility and viability of implementing policy requirements on a case by case basis as set out in paragraphs 3.1.3 and 3.1.4. As such, it is not considered necessary for the SPD to provide any further guidance beyond that already provided.

34012

(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019

Agent: Carter Jonas (Mr Brian Flynn) [2200]

Respondent: **Axis Land Partnerships (Mr Andrew Adams) [7785]**

Received: **23/9/2019 via Email**

It is considered that Section 3.2 is confusing, and as such could be written in a much clearer and simpler format to assist potential users of the draft SPD. It is suggested that revised versions of Tables 3.3 and 3.4 should be prepared to explain in a simple format all of the policy and document requirements of Policies 28, 30 and CC/3; Table 3.3 and 3.4 current relate to the South Cambridgeshire Local Plan but could be adapted for the Cambridge Local Plan policies.

Councils response:

Section 3.2 has been adapted from guidance contained in the 2007 Cambridge Sustainable Design and Construction SPD and guidance for the implementation of the carbon reduction requirements of the Code for Sustainable Homes, which has also been in use since 2007. As such, this guidance is well understood by Sustainability and Mechanical Engineering Consultants that would normally prepare Energy and Carbon reduction Statements as part of planning applications.

33968	<p>(Comment) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email</p> <p>3.2.2, 2.2.5: Sets out current targets for energy reduction which we know will change. It would be good to have a likely future target within this section- i.e. 40% reduction on Part L 2013 in line with other Councils and the likely result of changes in line with the new Climate Change Act 2008 (2050 Target Amendment)</p> <p>Table 3.1 Sample SAP states 'where possible' SAP 10 carbon intensity figures should be used. We suggest SAP 10 carbon intensity figures must be used.</p> <p>Code for sustainable homes 4 now outdated - replace with current standards.</p> <p>3.2.6 "Be lean, be clean, be green" - is too vague for the sustainability and carbon reduction statements. Instead we should have measurable standards for benchmarking the statement</p> <p>3.2.12 - people must submit their current EPC and provide evidence that they are upgrading it</p> <p>3.2.15 Increase the CO2 reduction from 10% to greater figure</p>
-------	--

Councils response:

The SPD can only provide guidance on adopted policy and as such, cannot be used to amend current policy requirements related to energy and carbon reduction. It is recognised that the requirements in the adopted Local Plan will be subject to change as a result of future changes to Building Regulations and as such wording will be included in the SPD in relation to the need for further guidance on the implementation of policy once these changes are

known. Additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.

With regards to the role of EPCs in the implementation of policy 30 of the Cambridge Local Plan, the reference will be updated so that for homes with an up to date EPC, these are submitted alongside the home energy questionnaire.

Change to the SPD:

Insert new paragraph after 1.17 to read:

The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.

Amend the second sentence of paragraph 3.2.12 to read:

Where a property has recently had an Energy Performance Certificate (EPC) prepared, this ~~could~~ should also be submitted alongside the questionnaire, and the Council would count measures identified within the EPC towards meeting the requirements of policy 30 subject to evidence being provided that these measures have been implemented (e.g. receipts for work or photographic evidence).

33923	<p>(Support) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mr . Wookey [3642] Received: 23/9/2019 via Web</p> <p>There is widespread community support for low-carbon buildings. I support the thrust of this section as a minimum requirement. It is not sufficient to adress decarbonisation as it stands so should not be watered-down any further.</p> <p>I strongly support Policy 30 (basic retrofit requirements) as part of dealing with the existing stock.</p> <p>The Energy hierarchy, ensuring fabric-first approach is vital.</p>
-------	--

Councils response:

Support noted.

33916	<p>(Comment) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: University of Cambridge (Miss Rochelle Duncan) [7309]</p> <p>Received: 23/9/2019 via Web</p> <p>Will policies to maximise biodiversity and space for photovoltaic arrays at roof level compromise positioning and sizing of ASHP and MVHR systems.</p>
<p>Councils response:</p> <p>Implementation of policies related to biodiversity and carbon reduction will need to take consideration of issues such as space for roof plant, although it should be noted that the Council does not set specific requirements related to space for photovoltaic arrays. Where these issues are considered early in the design process, all of these considerations can be provided for as part of a balanced approach.</p>	
33906	<p>(Object) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109]</p> <p>Received: 23/9/2019 via Web</p> <p>SCDC approach seems to be "design to Part L of the Building Regs", then certify how your plan reduces non-renewable consumption by 10% - requiring an Energy Statement to confirm it.</p> <p>There is no evidence provided for the adoption of an arbitrary 10% reduction figure, which will lead to ambiguity in compliance, especially at appeal.</p> <p>Extensive tutorial material seems unnecessary now the technologies are well-established. It should also be possible to simplify certification.</p> <p>Measures to reduce energy consumption from built stock should be deregulated, planning-wise.</p> <p>Some of the data used (efficiency of bulk power generation) seems out of date.</p>
<p>Councils response:</p> <p>The requirements of policy CC/3 were informed by the Councils previous renewable energy policy and evidence as to the technical feasibility and financial viability of such an approach.</p>	
33888	<p>(Comment) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mr Oliver Cooper [8107]</p>

	<p>Received: 22/9/2019 via Web</p> <p>Revise paragraph 3.1.4 of this SPD to make clear that viability arguments for new build developments & un-listed existing buildings will not be accepted as a means of bypassing the Energy & Carbon Reduction targets imposed by Cambridge Plan policies 28 + 30 and South Cambs Policy CC/3.</p>
<p>Councils response:</p> <p>Comment noted. The requirements set out in the adopted Local Plans have been subject to viability testing and have been found to be viable. To date, considerations of viability have not led to the need to amend the requirements of these policies. However, national policy does require viability to be taken into consideration when determining planning applications and as such, these paragraphs are considered important to ensure that any negotiations take place at an early stage in order that the principles behind the policies can still be delivered.</p>	
33874	<p>(Support) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Tom Bragg (Mr Tom Bragg) [1927]</p> <p>Received: 20/9/2019 via Web</p> <p>We support:</p> <ol style="list-style-type: none"> 1) the important energy and carbon reduction policy, particularly the use of the Energy Hierarchy to minimise energy demand first and only then use renewables etc to cut net carbon emissions. 2) the use of Modern Methods of Construction (4.3.1) to minimise the embodied carbon in building construction as a step towards Zero Carbon Building in construction, as well as operation. 3) Policy 30 as a small step towards meeting this challenge, that's within the Council's power, requiring homeowners making extension or loft conversions to compensate resulting energy consumption increases with energy efficiency improvements elsewhere.
<p>Councils response:</p> <p>Support noted.</p>	
33869	<p>(Support) Section 3: Policy Implementation, 3.2 Energy and Carbon Reduction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Carbon Neutral Cambridge (Ms Anne Miller) [7909]</p> <p>Received: 17/9/2019 via Web</p> <p>We particularly support the energy and carbon reduction policy, policy 30 (with its very modest requirement for home owners to carry out compensatory energy efficiency improvements when carrying out extensions and loft conversions), the energy hierarchy. We support MMC, and would like to see more encouragement of the use of traditional low carbon cladding</p>

	systems, such as timber and lime
Councils response: Support noted.	

Section 3.3: Water efficiency

34133	<p>(Object) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>Paragraph 3.3.3 of the draft SPD identifies a requirement for a water conservation strategy to be prepared for all residential applications. However, Policy 28 of the Cambridge Local Plan and Policy CC/4 of the South Cambridgeshire Local Plan do not mention any requirements for a water conservation strategy for residential applications. Therefore, the approach requiring a water conservation strategy is inconsistent with the requirements for and role of supplementary planning guidance.</p> <p>In terms of non-residential development, Policies 28 and CC/4 require a BREEAM assessment to be undertaken to demonstrate water efficiency standards. In these circumstances, no further guidance on water efficiency for non-residential development is necessary.</p>
<p>Councils response:</p> <p>Concern noted. It is considered appropriate for the SPD to provide guidance on the information that should be submitted with applications to demonstrate how the requirements of the Councils respective planning policies on water efficiency have been met, as this information is often missing from planning applications. However, it is noted that this information could be included within the Sustainability Statement as opposed to requiring the submission of a separate document. As such, the SPD will be amended to remove references to the submission of a Water Conservation Strategy, instead referring to the provision of information on water efficiency as part of the Sustainability Statement.</p> <p>Change to the SPD:</p> <p>Amend the following:</p> <p>Water efficiency in residential developments Table: <u>SUBMISSION REQUIREMENTS Water Conservation Strategy Sustainability Statement to include water efficiency specifications</u></p> <p>Amend the first sentence of paragraph 3.3.3 to read: In order to demonstrate compliance with both the Cambridge and South</p>	

Cambridgeshire policies, the submission of a Water Conservation Strategy Sustainability Statement is required.

Water efficiency in non-residential development – South Cambridgeshire Table:

SUBMISSION REQUIREMENTS ~~Water Conservation Strategy~~ Sustainability Statement to include water efficiency specifications

Amend the first sentence of paragraph 3.3.8 to read:

In order to demonstrate compliance with the policy, a Water Conservation Strategy Sustainability Statement should be submitted as part of the planning application.

Appendix 1a – Sustainability Checklist for applications in Cambridge.

Amend Wat.1 to read:

For residential development have you prepared a Water Conservation Strategy Sustainability Statement setting out how your proposals will meet the requirement for potable water use of no more than 110 litres/person/day?

Appendix 1b – Sustainability Checklist for applications in South Cambridgeshire

Amend Wat.1 to read:

For residential development have you prepared a Water Conservation Strategy Sustainability Statement setting out how your proposals will meet the requirement for potable water use of no more than 110 litres/person/day?

(Support) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019

Agent: David Lock Associates (Mr Harry Jones) [8143]

Respondent: **Urban&Civic Ltd [5688]**

Received: **23/9/2019 via Email**

34114

U&C supports policy CC/4 for water efficient residential development requiring no more than 110 litres/person/day. U&C's proposals for Waterbeach Barracks include a commitment to meeting this policy requirement with the ambition to achieve a lower standard - 100 litres/person/day through further advice and educational measures alongside other water reduction technologies.

Similarly, U&C's proposals for Waterbeach Barracks will target the requirement of Policy CC/4 that non-residential development should achieve a minimum of 2 BREEAM credits for Wat 01 and this element of the SPD is supported.

Councils response:

Support noted.	
34098	<p>(Object) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>Water efficiency (3.3) is vital. 3.3.1 Is there capacity for approved and proposed growth" 3.3.2. How can this be "optional"? How does this relate to both current demands and demands with current and approved growth?</p>
<p>Councils response:</p> <p>Concerns noted. With regards to capacity for approved and proposed growth, the Councils liaised closely with Cambridge Water and the Environment Agency in the development of the adopted Local Plans to ensure that there was sufficient water resources capacity to support the current levels of growth and to identify measures to reduce water use where needed. As a result of this work, the Cambridge Local Plan as originally drafted and submitted to the Secretary of State, the Cambridge Local Plan did seek more stringent standards for water efficiency in housing (80 litres/person/day) in response to the levels of water stress facing the area. However, as a result of the Governments Housing Standards Review and subsequent Deregulation Bill, we were required to remove this requirement by the Inspector examining the Cambridge Local Plan, replacing this with the optional technical standard from Part G of the Building Regulations of 110 litres/person/day. As such, this requirement will be sought from all scales of housing development across Cambridge and South Cambridgeshire.</p> <p>The SPD cannot set requirements for water efficiency beyond those contained in the adopted Local Plans. Further work will be carried out in support of the development of the Greater Cambridge Local Plan, which will also consider whether the setting of more stringent targets for water efficiency should be pursued through policy. However, further information on ways to futureproof developments to enable elements such as retrofitting of rainwater harvesting will be added to the SPD.</p> <p>Change to the SPD:</p> <p>Insert new paragraph after 1.17 to read: <u>The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.</u></p>	

34083	<p>(Object) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033] Received: 23/9/2019 via Email</p> <p>We wish to object to the present content of the SPD with respect to water in Section 3.3 Water Efficiency.</p> <p>Whilst the document focuses on "Water efficiency", it is clear that it has not been demonstrated that there is sufficient water supply within Greater Cambridge to support future development but furthermore that existing ground water abstraction is impacting water flows within chalk streams in the region and may need to be reduced, especially in the light of climate change.</p> <p>The situation with groundwater around Cambridge is critical. Using water more efficiently is important, but efficiency will not increase the maximum volume of water that can be supplied on a sustainable basis without impacting the environment.</p> <p>As such REFUSAL of some developments may be necessary where there is no available water to supply them and/or the environmental impacts caused from supplying that water outweigh benefits of the grant of that permission.</p> <p>We recommend that the section on water efficiency in the SPD be amended (see suggested changes in full text).</p>
	<p>Councils response:</p> <p>Concerns noted. With regards to capacity for approved and proposed growth, the Councils liaised closely with Cambridge Water and the Environment Agency in the development of the adopted Local Plans to ensure that there was sufficient water resources capacity to support the current levels of growth and to identify measures to reduce water use where needed. As a result of this work, the Cambridge Local Plan as originally drafted and submitted to the Secretary of State, the Cambridge Local Plan did seek more stringent standards for water efficiency in housing (80 litres/person/day) in response to the levels of water stress facing the area. However, as a result of the Governments Housing Standards Review and subsequent Deregulation Bill, we were required to remove this requirement by the Inspector examining the Cambridge Local Plan, replacing this with the optional technical standard from Part G of the Building Regulations of 110 litres/person/day. As such, this requirement will be sought from all scales of housing development across Cambridge and South Cambridgeshire.</p> <p>The SPD cannot set requirements for water efficiency beyond those contained in the adopted Local Plans. Further work will be carried out in support of the</p>

development of the Greater Cambridge Local Plan, which will also consider whether the setting of more stringent targets for water efficiency should be pursued through policy. However, further information on ways to futureproof developments to enable elements such as retrofitting of rainwater harvesting will be added to the SPD.

Change to the SPD:

Insert new paragraph after 1.17 to read:

The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.

34076	<p>(Comment) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: South Cambridgeshire District Council (Mr Nick Lockley) [8142] Received: 23/9/2019 via Email</p> <p>3.3.2 the limit of 110 litres of water use per day is noted as a key efficiency to achieve in design of the house water utilities.</p>
-------	---

Councils response:

Comment noted.

34055	<p>(Object) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>Paragraph 3.3.3 of the draft SPD identifies a requirement for a water conservation strategy to be prepared for all residential applications. However, Policy 28 of the Cambridge Local Plan and Policy CC/4 of the South Cambridgeshire Local Plan do not mention any requirements for a water conservation strategy for residential applications. Therefore, the approach requiring a water conservation strategy is inconsistent with the requirements for and role of supplementary planning guidance.</p> <p>In terms of non-residential development, Policies 28 and CC/4 require a BREEAM assessment to be undertaken to demonstrate water efficiency standards. In these circumstances, no further guidance on water efficiency for non-residential development is necessary.</p>
-------	--

Councils response:

Concern noted. It is considered appropriate for the SPD to provide guidance on the information that should be submitted with applications to demonstrate how the requirements of the Councils respective planning policies on water efficiency have been met, as this information is often missing from planning applications. However, it is noted that this information could be included within the Sustainability Statement as opposed to requiring the submission of a separate document. As such, the SPD will be amended to remove references to the submission of a Water Conservation Strategy, instead referring to the provision of information on water efficiency as part of the Sustainability Statement.

Change to the SPD:

Amend the following:

Water efficiency in residential developments Table:

SUBMISSION REQUIREMENTS ~~Water Conservation Strategy~~ Sustainability Statement to include water efficiency specifications

Amend the first sentence of paragraph 3.3.3 to read:

In order to demonstrate compliance with both the Cambridge and South Cambridgeshire policies, the submission of a ~~Water Conservation Strategy~~ Sustainability Statement is required.

Water efficiency in non-residential development – South Cambridgeshire Table:

SUBMISSION REQUIREMENTS ~~Water Conservation Strategy~~ Sustainability Statement to include water efficiency specifications

Amend the first sentence of paragraph 3.3.8 to read:

In order to demonstrate compliance with the policy, a ~~Water Conservation Strategy~~ Sustainability Statement should be submitted as part of the planning application.

Appendix 1a – Sustainability Checklist for applications in Cambridge.

Amend Wat.1 to read:

For residential development have you prepared a ~~Water Conservation Strategy~~ Sustainability Statement setting out how your proposals will meet the requirement for potable water use of no more than 110 litres/person/day?

Appendix 1b – Sustainability Checklist for applications in South Cambridgeshire

Amend Wat.1 to read:

For residential development have you prepared a ~~Water Conservation~~

Strategy Sustainability Statement setting out how your proposals will meet the requirement for potable water use of no more than 110 litres/person/day?

34041 **(Object) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019**
Agent: Turley (Paul White) [8111] (unconfirmed)
Respondent: **Countryside Properties (UK) Limited and The Taylor Family [7429]**
Received: **23/9/2019 via Email**
Paragraph 3.3.4 states non-residential development is required to achieve the full Wat01 water efficiency credits in accordance with the BREEAM 2018 scheme in line with the requirements of Policy 28. While the requirement for new development to reduce water consumption is supported it is considered that this requirement does not take into account the potential feasibility and viability constraints of achieving this requirement in all forms of non-residential development. Achieving the full credits will likely require the use of rainwater or grey water harvesting, heavily restricted sanitary fittings and as a result increased maintenance issue. It is recommended that guidance is provided to allow the flexibility in how this Policy is delivered. For example this Policy could be amended to be consistent with the requirement in South Cambridgeshire District to include a lower baseline water efficiency requirement which is achievable by all development, i.e. 2 Wat01 credits, a 25% reduction in water consumption, noting that where possible development should aim to exceed this requirement.

Councils response:
Concern noted. The requirements of policy 28 were developed in response to evidence contained in the Water Cycle Strategy and the Cambridge Water Resource Management Plan in relation to the levels of water stress facing the area and the measures required to support the long term sustainability of water resources. This requirement was subject to viability testing as part of the local plan and was found to be viable. However, it is noted that for some schemes it is not always technically feasible to meet the requirements of the policy in full. Policy 28 does allow for feasibility and viability to be taken into account, with further guidance in relation to this in paragraphs 3.1.3 and 3.1.4 of the SPD. Where full compliance with the requirements of policy 28 is not possible, this will be considered on a case by case basis and should be raised as part of the pre-application process. As such, it is not considered necessary to amend the SPD or the policy requirements for Cambridge further.

34028 **(Comment) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019**
Agent: No. 6 Developments (Mr Richard Oakley) [8140]
Respondent: **Cambridge University Hospital NHS Foundation Trust (Carin Charlton) [8141]**
Received: **23/9/2019 via Email**

	<p>Whilst CUH embrace the aspirations of the Councils in improving water efficiency, it is considered that the guidance as set out in the SPD is not relevant to our unique circumstances. All healthcare buildings have unique water challenges, with higher levels of water use and waste water than a typical non-residential development. As an example, approaches to water management such as rainwater harvesting and grey water recycling may not be possible or appropriate in an acute hospital environment due to the exacting standards required to protect the health of vulnerable patients, and may only be possible (for instance) to support site landscaping.</p> <p>The SPD does not provide any additional guidance for non-typical development which may have unique water usage requirements. As such it is recommended that the SPD outline some exceptions (such as for healthcare buildings) where alternative approaches may be acceptable.</p>
	<p>Councils response:</p> <p>Concern noted. The requirements of policy 28 were developed in response to evidence contained in the Water Cycle Strategy and the Cambridge Water Resource Management Plan in relation to the levels of water stress facing the area and the measures required to support the long term sustainability of water resources. This requirement was subject to viability testing as part of the local plan and was found to be viable. However, it is noted that for some schemes it is not always technically feasible to meet the requirements of the policy in full and for some types of development it may not be possible to utilise water reuse for health reasons. Guidance produced for NHS Scotland notes that rainwater harvesting should not be used in situations where immunocompromise patients are present, but that there might be some cases, notably in new build developments, where it can be used. Policy 28 does allow for feasibility and viability to be taken into account, with further guidance in relation to this in paragraphs 3.1.3 and 3.1.4 of the SPD. In light of this, it is not considered necessary for the SPD to identify cases where the policy where alternative approaches may be acceptable, as this needs to be considered on a case by case basis and should be raised as part of the pre-application process.</p>
34013	<p>(Object) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>Paragraph 3.3.3 of the draft SPD identifies a requirement for a water conservation strategy to be prepared for all residential applications. However, Policy 28 of the Cambridge Local Plan and Policy CC/4 of the South Cambridgeshire Local Plan do not mention any requirements for a water conservation strategy for residential applications. Therefore, the approach requiring a water conservation strategy is inconsistent with the requirements for and role of supplementary planning guidance.</p>

In terms of non-residential development, Policies 28 and CC/4 require a BREEAM assessment to be undertaken to demonstrate water efficiency standards. In these circumstances, no further guidance on water efficiency for non-residential development is necessary.

The water efficiency standards for residential and non-residential developments could be incorporated into a revamped Sustainability Checklist.

Councils response:

Concern noted. It is considered appropriate for the SPD to provide guidance on the information that should be submitted with applications to demonstrate how the requirements of the Councils respective planning policies on water efficiency have been met, as this information is often missing from planning applications. However, it is noted that this information could be included within the Sustainability Statement as opposed to requiring the submission of a separate document. As such, the SPD will be amended to remove references to the submission of a Water Conservation Strategy, instead referring to the provision of information on water efficiency as part of the Sustainability Statement.

Change to the SPD:

Amend the following:

Water efficiency in residential developments Table:

SUBMISSION REQUIREMENTS ~~Water Conservation Strategy~~ Sustainability Statement to include water efficiency specifications

Amend the first sentence of paragraph 3.3.3 to read:

In order to demonstrate compliance with both the Cambridge and South Cambridgeshire policies, the submission of a Water Conservation Strategy Sustainability Statement is required.

Water efficiency in non-residential development – South Cambridgeshire Table:

SUBMISSION REQUIREMENTS ~~Water Conservation Strategy~~ Sustainability Statement to include water efficiency specifications

Amend the first sentence of paragraph 3.3.8 to read:

In order to demonstrate compliance with the policy, a Water Conservation Strategy Sustainability Statement should be submitted as part of the planning application.

Appendix 1a – Sustainability Checklist for applications in Cambridge.

Amend Wat.1 to read:

For residential development have you prepared a ~~Water Conservation Strategy~~ Sustainability Statement setting out how your proposals will meet the requirement for potable water use of no more than 110 litres/person/day?

Appendix 1b – Sustainability Checklist for applications in South Cambridgeshire

Amend Wat.1 to read:

For residential development have you prepared a ~~Water Conservation Strategy~~ Sustainability Statement setting out how your proposals will meet the requirement for potable water use of no more than 110 litres/person/day?

33953	<p>(Support) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Environment Agency (Mr Chris Swain) [4745] Received: 23/9/2019 via Email</p> <p>We support the policy as stated as this is the best achievable using Building Regs.</p> <p>Other techniques not listed are for developers to go beyond the water efficiency standards by promoting rainwater harvesting, either on a community scale, or on a property scale. On a property scale, developers could be required to provide 'stage 1 fit' pipework for rainwater Harvesting, thereby leaving individual and future homeowners the option of purchasing their own RWH systems without incurring the significant expense of interior retrofit.</p>
-------	---

Councils response:

Support noted. Further information on ways to futureproof developments to enable elements such as retrofitting of rainwater harvesting will be added to the SPD.

Change to the SPD:

Insert new paragraph after 1.17 to read:

The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.

33948	<p>(Object) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cam Valley Forum (Stephen Tomkins) [7220] Received: 23/9/2019 via Email</p>
-------	--

	<p>In the summer of 2019 all the chalk streams of the Cam catchment have dried up again. This is a major infrastructural problem that is insufficiently considered.</p>
	<p>Councils response:</p> <p>Concerns noted. With regards to capacity for approved and proposed growth, the Councils liaised closely with Cambridge Water and the Environment Agency in the development of the adopted Local Plans to ensure that there was sufficient water resources capacity to support the current levels of growth and to identify measures to reduce water use where needed. As a result of this work, the Cambridge Local Plan as originally drafted and submitted to the Secretary of State, the Cambridge Local Plan did seek more stringent standards for water efficiency in housing (80 litres/person/day) in response to the levels of water stress facing the area. However, as a result of the Governments Housing Standards Review and subsequent Deregulation Bill, we were required to remove this requirement by the Inspector examining the Cambridge Local Plan, replacing this with the optional technical standard from Part G of the Building Regulations of 110 litres/person/day. As such, this requirement will be sought from all scales of housing development across Cambridge and South Cambridgeshire.</p> <p>The SPD cannot set requirements for water efficiency beyond those contained in the adopted Local Plans. Further work will be carried out in support of the development of the Greater Cambridge Local Plan, which will also consider whether the setting of more stringent targets for water efficiency should be pursued through policy.</p>
33933	<p>(Comment) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Anglian Water Services Ltd (Mr Stewart Patience) [5918]</p> <p>Received: 23/9/2019 via Email</p> <p>3.3 Water Efficiency</p> <p>Anglian Water welcome the inclusion of reference to water re-use forming part of Sustainability Checklists (Appendix 1 of the SPD). For consistency water re-use should also be referenced in section 3.3 as incorporation of water efficiency/re-use measures should be considered as a whole as part of new developments.</p>
	<p>Councils response:</p> <p>Comment noted. While the SPD cannot set policy requirements beyond those contained in the Cambridge and South Cambridgeshire Local Plans, additional text will be added to paragraph 3.3.2 of the SPD to encourage developers to give further consideration to water re-use as part of an integrated approach to water management.</p> <p>Change to the SPD:</p>

<p>Add an additional sentence to the end of paragraph 3.3.2 as follows: <u>Given the level of water stress facing the area, the Councils will be supportive of schemes that seek to integrate site wide approaches to water reuse in order to deliver greater water efficiency as part of an integrated approach to water management. We would recommend early engagement with the areas water companies for any schemes looking to utilise such an approach.</u></p>	
33917	<p>(Comment) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: University of Cambridge (Miss Rochelle Duncan) [7309] Received: 23/9/2019 via Web</p> <p>Rainwater harvesting systems work best in isolation of green/brown roofs.</p> <p>Achieving five water credits will be too challenging for smaller projects.</p>
<p>Councils response:</p> <p>Rainwater harvesting is compatible with green/brown roofs, and it is quite common to harvest water from green roofs in countries such as Germany and Switzerland. There are two issues that do, however, need to be taken into consideration:</p> <ol style="list-style-type: none"> 1. The volume of water that can be harvested is reduced; 2. Organic material in the substrates can be initially flushed out into the water causing discolouration. <p>Mineral based substrates can be used that do not cause discolouration and this is a common practice on the continent.</p> <p>With regards to the achievement of five water credits for smaller projects, this requirement was subject to viability testing as part of the local plan and was found to be viable. However, it is noted that for some schemes it is not always technically feasible to meet the requirements of the policy in full. Policy 28 does allow for feasibility and viability to be taken into account, with further guidance in relation to this in paragraphs 3.1.3 and 3.1.4 of the SPD. Where full compliance with the requirements of policy 28 is not possible, this will be considered on a case by case basis and should be raised as part of the pre-application process.</p>	
33905	<p>(Object) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>It is difficult to see how this strategy can be much more than a "nudge" rather than rationing approach, especially as the number of occupants cannot be reliably known and technology is evolving.</p> <p>There seems to be no correlation between the number of occupants and number of bathrooms, including how well-equipped they are,</p>

	<p>including the control of the water efficiency of the dish/washing machines.</p> <p>Nevertheless we want designs to restrict usage to 90% of the Building Regs allowance. Is there a basis for this arbitrary figure?</p> <p>There could be incentives in new build to use grey water far more.</p>
--	---

Councils response:

Concern noted. The water efficiency requirements for which the SPD provides guidance were developed in response to evidence contained in the Water Cycle Strategy and the Cambridge Water Resource Management Plan in relation to the levels of water stress facing the area and the measures required to support the long term sustainability of water resources. These requirement was subject to viability testing as part of the local plan and was found to be viable. The Councils would be supportive for the reuse of water, either grey water or rainwater, as part of schemes, and further text will be added to the SPD to encourage this approach.

The SPD cannot set requirements for water efficiency beyond those contained in the adopted Local Plans. Further work will be carried out in support of the development of the Greater Cambridge Local Plan, which will also consider whether the setting of more stringent targets for water efficiency should be pursued through policy.

Change to the SPD

Add an additional sentence to the end of paragraph 3.3.2 as follows:
Given the level of water stress facing the area, the Councils will be supportive of schemes that seek to integrate site wide approaches to water reuse in order to deliver greater water efficiency as part of an integrated approach to water management. We would recommend early engagement with the areas water companies for any schemes looking to utilise such an approach.

33871	<p>(Support) Section 3: Policy Implementation, 3.3 Water efficiency - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Carbon Neutral Cambridge (Ms Anne Miller) [7909] Received: 17/9/2019 via Web</p> <p>We are in one of the driest parts of the country and already suffering from over abstraction of water. Climate change means that both droughts and flash flooding are likely to get more frequent. We want to see strict controls on the use of water by new housing developments, the encouragement of grey water systems, with much more stringent water use standards applied in the forthcoming Local Plan.</p>
-------	--

Councils response:

Support noted. Further work will be carried out in support of the development of the Greater Cambridge Local Plan, which will consider whether the setting

of more stringent targets for water efficiency should be pursued through policy.

Insert new paragraph after 1.17 to read:

The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.

Section 3.4: Climate change adaptation

134	<p>(Object) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>Section 3.4 deals with climate change adaptation. Policy 28 of the Cambridge Local Plan and Policy CC/1 of the South Cambridgeshire Local Plan refer to climate change adaptation measures within development. Section ID. 6 of the Planning Practice Guidance provides detailed guidance on climate change, and Paragraph 003 provides guidance on mitigating climate change by reducing emissions and guidance on adapting to a changing climate. It is noted that Section 3.4 refers to guidance by other organisations, including the Chartered Institution of Building Services Engineers who has produced guidance on overheating for example. In these circumstances further guidance on climate change adaptation is not necessary. A simpler approach would be to direct users of the draft SPD to that other available guidance.</p> <p>In terms of trees, South Cambridgeshire District Council has an adopted Trees and Development Sites SPD, which may need to be updated to reflect adopted development plan policies. There are policies within the Cambridge Local Plan and South Cambridgeshire Local Plan that seek to protect existing trees and require additional landscaping and other green infrastructure. There are British Standards that require trees to be protected during construction. In these circumstances, additional guidance on trees associated with climate change adaptation is not necessary.</p>
-----	--

Councils response:

It is noted that guidance related to climate change adaptation is available

elsewhere, and where possible the SPD refers to this guidance. However, to date, other than flood risk, many applications have contained insufficient information regarding how they have integrated measures to enable their proposal to adapt to future climate change even with the presence of national guidance. Given the important role that the design of new development has to play in enabling communities to adapt to our changing climate, it is considered that the level of detail in the SPD is appropriate. Note that the Trees and Development Sites SPD is only applicable to developments in South Cambridgeshire and at the time of writing, there are no plans to update this SPD.

34116	<p>(Comment) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>Green and Brown Roofs In line with Policy CC/8 of the South Cambridgeshire Local Plan, U&C agrees that green and brown roofs can be part of the mix of measures contributing to climate change adaption strategies for strategic development. However, Policy CC/8 should not be read as a requirement for all roofs (or even all flat roofs) within a development to be green.</p> <p>As such, U&C suggests that the SPD should be clearer by setting out as to the circumstances, building types and uses where green and brown roofs should be considered. Where green or brown roofs would be applicable, it would be helpful if the SPD defined an indicative minimum standard for the roof area to be constructed as a green or brown roof. For example, for most applicable buildings, there will be a requirement for a roof space to accommodate plant and other infrastructure which must be balanced with any requirement for other uses of the space.</p>
-------	--

Councils response:

Concerns noted. It is noted that policy CC/8 of the South Cambridgeshire Local Plan only encourages the use of green roofs, and it is not the intention of the SPD to amend this policy requirement but to highlight the multiple benefits that green or brown roofs can offer. However, it is not considered necessary to set out which building types present an opportunity for green roofs, as they can be utilised on all buildings, and at a variety of scales, as is already referenced in the SPD at paragraph 3.4.29. Application of policy CC/8 of the South Cambridgeshire Local Plan will be on a case by case basis giving consideration to a variety of factors and would ideally form part of the discussions at the pre-application stage.

34115	<p>(Support) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p>
-------	---

	<p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>U&C supports the SPD's general approach to climate change adaption which is an inherent part of U&C's approach to the master planning of its strategic sites. Of note, at Waterbeach Barracks, U&C's proposals seek to utilise and enhance the exiting green infrastructure of the site as a framework for the development. A key aspect of this approach is to retain existing trees and supplement the overall tree canopy through new tree planting.</p>
<p>Councils response: Support noted.</p>	
34082	<p>(Support) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033] Received: 23/9/2019 via Email</p> <p>Strong support for the cooling hierarchy idea (pp 55 and fig 5) that developers must first pay attention to passive measures for keeping cool architectural approaches such as shading, solar control, cross ventilation etc AND especially p 57, strong support for Green infrastructure such as trees and soft landscaping.</p>
<p>Councils response: Support noted.</p>	
34077	<p>(Comment) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: South Cambridgeshire District Council (Mr Nick Lockley) [8142] Received: 23/9/2019 via Email</p> <p>3.4.37 The information given about the problems of roofs radiating heat is noted and our team perhaps need to look into ways roofs can be constructed to reflect more heat.</p>
<p>Councils response: Comment noted.</p>	
34068	<p>(Support) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mrs Kati Preston [2801] Received: 23/9/2019 via Email</p> <p>In essence I am in strong support of the Sustainable Design and Construction SPD. Within a document with such a scope as this one, problems and omissions must be inevitable; I would particularly like to</p>

	support sections 3.4.16 through to 3.4.28 Adaptation Strategies - the role of green infrastructure.
Councils response: Support noted.	
34056	<p>(Object) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>There are many other sources of guidance on climate change adaptation. In these circumstances further guidance on climate change adaptation is not necessary. A simpler approach would be to direct users of the draft SPD to that other available guidance.</p> <p>In terms of trees, South Cambridgeshire District Council has an adopted Trees and Development Sites SPD, which may need to be updated to reflect adopted development plan policies. There are policies within the Cambridge Local Plan and South Cambridgeshire Local Plan that seek to protect existing trees and require additional landscaping and other green infrastructure. There are British Standards that require trees to be protected during construction. In these circumstances, additional guidance on trees associated with climate change adaptation is not necessary.</p> <p>Requested Change To substantially edit Section 3.4, and refer to existing guidance on climate change adaption provided in Planning Practice Guidance and by the Chartered Institution of Building Services Engineers for example.</p>
Councils response: It is noted that guidance related to climate change adaptation is available elsewhere, and where possible the SPD refers to this guidance. However, to date, other than flood risk, many applications have contained insufficient information regarding how they have integrated measures to enable their proposal to adapt to future climate change even with the presence of national guidance. Given the important role that the design of new development has to play in enabling communities to adapt to our changing climate, it is considered that the level of detail in the SPD is appropriate. Note that the Trees and Development Sites SPD is only applicable to developments in South Cambridgeshire and at the time of writing, there are no plans to update this SPD.	
34029	<p>(Comment) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: No. 6 Developments (Mr Richard Oakley) [8140]</p>

	<p>Respondent: Cambridge University Hospital NHS Foundation Trust (Carin Charlton) [8141] Received: 23/9/2019 via Email</p> <p>CUH is committed to tackling climate change and ensuring its sites are adaptable to the risks of climate change. Space constraints within the core hospital site may also limit opportunities (for instance sustainable drainage solutions).</p> <p>We wish to encourage the Council to ensure that flexibility is built in to the SPD for circumstances where the suggested measures are not appropriate or where other factors (such as NHS standards in the case of CUH) must be satisfied as a first priority.</p>
<p>Councils response:</p> <p>Concern noted. Paragraphs 3.13 and 3.1.4 already give consideration to viability and technical feasibility considerations in applying the requirements of adopted policy. Such issues should be raised with the Planning Service at the earliest possible opportunity as part of pre-application discussions in order that alternative solutions can be identified where required. As such, it is considered that the SPD already contains sufficient flexibility.</p>	
34014	<p>(Object) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>To substantially edit Section 3.4, and refer to existing guidance on climate change adaption provided in Planning Practice Guidance and by the Chartered Institution of Building Services Engineers for example.</p> <p>In terms of trees, South Cambridgeshire District Council has an adopted Trees and Development Sites SPD, which may need to be updated to reflect adopted development plan policies. There are policies within the Cambridge Local Plan and South Cambridgeshire Local Plan that seek to protect existing trees and require additional landscaping and other green infrastructure. There are British Standards that require trees to be protected during construction. In these circumstances, additional guidance on trees associated with climate change adaptation is not necessary.</p>
<p>Councils response:</p> <p>It is noted that guidance related to climate change adaptation is available elsewhere, and where possible the SPD refers to this guidance. However, to date, other than flood risk, many applications have contained insufficient information regarding how they have integrated measures to enable their proposal to adapt to future climate change even with the presence of national guidance. Given the important role that the design of new development has to play in enabling communities to adapt to our changing climate, it is</p>	

considered that the level of detail in the SPD is appropriate. Note that the Trees and Development Sites SPD is only applicable to developments in South Cambridgeshire and at the time of writing, there are no plans to update this SPD.

33989 **(Support) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019**
Respondent: **Natural England (Janet Nuttall) [1009]**
Received: **23/9/2019 via Email**
We support the encouragement of provision of green and brown roofs, noting that for new development in Cambridge, all flat roofs are required to be green or brown roofs in line with the requirements set out in policy 31 of the Cambridge Local Plan (2018). Policy CC/8 of the South Cambridgeshire Local Plan (2018) encourages the use of green roofs. In addition to providing habitat for a range of species green and brown roofs can reduce storm run-off and help to maintain a more constant building temperature.

Councils response:

Support noted.

33988 **(Comment) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019**
Respondent: **Natural England (Janet Nuttall) [1009]**
Received: **23/9/2019 via Email**
We agree that the quality of trees planted is important in providing effective long-term mitigation. Natural England advises that an additional bullet point should be included along the following lines:

- Native species of local provenance, where possible - to maximise benefits for biodiversity.

Councils response:

Support noted and an additional bullet point will be added to paragraph 3.4.21.

Change to the SPD:

Add an additional bullet point to the end of paragraph 3.4.21 as follows:

- The use of native species of local provenance where possible, in order to maximise benefits for biodiversity.

33987 **(Support) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019**
Respondent: **Natural England (Janet Nuttall) [1009]**
Received: **23/9/2019 via Email**
We support acknowledgement of the significant multi-functional role green infrastructure can play in helping to deliver sustainable

	<p>developments. We welcome recognition that green infrastructure has the potential to enhance the adaptive capacity of an area, for example through the integration of sustainable drainage features (blue infrastructure) and through enhancing urban cooling. Appropriate retention and incorporation of trees and other vegetation within development design can help to sequester carbon, reduce noise, absorb particulate pollution, provide cooling and shade, and reduce surface water runoff.</p>
<p>Councils response: Support noted.</p>	
33969	<p>(Comment) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email</p> <p>Section 3.4 gives examples rather than concrete guidance. Examples provided are useful and in places suggest a more explicit way to incorporate the examples -</p> <p>3.4.12 Consideration of overheating must be included in the DAS and must include thermal modelling in new build schemes on all major developments</p> <p>3.4.17 new developments to have at least 10% green/blue infrastructure on site area for all major applications, as the example in Manchester suggests</p>
<p>Councils response: Concern noted. The reference to ‘should’ in the final sentence of paragraph 3.4.12 will be amended to must and other references within this section shall also be reviewed. With regards to setting a specific level of area for green/blue infrastructure, SPDs can only provide implementation guidance for existing policies and cannot be used to set new policy requirements, such as setting requirements space requirements related to green infrastructure provision. Further work related to green infrastructure is being commissioned as part of the development of the Greater Cambridge Local Plan.</p> <p>Change to the SPD Paragraph 3.4.12 – amend the final sentence of this paragraph to read: Consideration of overheating should <u>must</u> be included in the Sustainability Statement and Design and Access Statement.</p>	
33956	<p>(Comment) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Environment Agency (Mr Chris Swain) [4745] Received: 23/9/2019 via Email</p>

	<p>When tree planting within a development consideration should also be given to the species planted and their provenance. It is advisable that native tree species are used for planting and that they are ideally of local provenance. This improves resilience to climate change and disease.</p> <p>As well as trees, hedgerows can also form an important component of green infrastructure. A network of hedgerows provide important wildlife corridors, linking areas of habitat and allowing wildlife to migrate between them. They can also form important habitats in the own right and provide important shading to watercourses during increasingly hot summers.</p>
<p>Councils response:</p> <p>Comment noted and additional reference to the use of native species of local provenance where possible is to be added to paragraph 3.4.21 of the SPD. The important role of hedgerows is also noted, and additional reference to hedgerows will be added to paragraph 3.4.1 of the SPD.</p> <p>Change to the SPD:</p> <p>Amend the second sentence of paragraph 3.4.16 as follow:</p> <p>It is the network of natural and manmade features such as open spaces, woodlands, <u>hedgerows</u>, landscapes, rights of way, waterways, historic parks and private gardens, which link and serve our communities and countryside.</p>	
33925	<p>(Support) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mr . Wookey [3642] Received: 23/9/2019 via Web</p> <p>Consideration of future climate is vital. I particularly support the cooling hierarchy emphasis on passive design, cross ventilation and the avoidance of air conditioning. This is absolutely appropriate for the UK climate, even with rises over the next century (approx building life).</p> <p>Again I suggest you advocate the use of passive house methodology to get reliable predictions of overheating behaviour.</p>
<p>Councils response:</p> <p>Support noted.</p>	
33904	<p>(Object) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Needs to define "overheating".</p>

	<p>The benefits of "green infrastructure", similarly, are difficult to quantify.</p> <p>The "tree canopy" tends to be reduced year on year as SCDC is reluctant to invest in TPOs; protections required in planning should be published and made more accessible at least to Parish Councils who review requests for tree work in CAs. With Cambridgeshire County Council's refusal to adopt trees, there is a conflict here.</p> <p>"Green/brown roofs" remain an expensive and difficult to maintain feature with limited quantifiable benefits.</p> <p>"Materials" have a high impact and "sustainable drainage systems" can be very important in rural applications.</p>
<p>Councils response:</p> <p>Comments noted. There has been a significant amount of work carried out nationally to quantify the benefits of green infrastructure. Likewise with green/brown roofs, work carried out in support of the London Plan has shown that not only do they have benefits including surface water attenuation, biodiversity enhancement and reducing the urban heat island effects, from a lifecycle perspective they can be more cost effective than a traditional flat roof, requiring minimal maintenance once they have become established.</p>	
33875	<p>(Support) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Tom Bragg (Mr Tom Bragg) [1927] Received: 20/9/2019 via Web</p> <p>We support the Cooling Hierarchy, having run events and written practical resources on 'Keeping Cool in a Heatwave'. Building design needs to minimise the effects of increasingly severe heatwaves from the outset: with good shading from shutters, blinds, awnings, trees and other passive measures such as low-G glass, thermal mass and good ventilation, the need for air conditioning should be a rarity.</p>
<p>Councils response:</p> <p>Support noted.</p>	
33870	<p>(Support) Section 3: Policy Implementation, 3.4 Climate change adaptation - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Carbon Neutral Cambridge (Ms Anne Miller) [7909] Received: 17/9/2019 via Web</p> <p>We strongly support the principle of the cooling hierarchy (figure 5) with its focus on passive ways of keeping homes cool in the increasingly frequent heatwaves that are to come. We know from experience that its highly effective to use natural and architectural approaches such as shading, solar control film, cross ventilation and stack ventilation, together with Green infrastructure such as trees and other solutions that give space for nature. The need for air conditioning</p>

	should be seen as a failure.
Councils response:	
Support noted.	

Section 3.5: Biodiversity

4135	<p>(Object) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>Policies 57 and 59 include criteria to enhance biodiversity in new development, and Appendix J provides detailed guidance on incorporating biodiversity into development. Policy NH/4 of the South Cambridgeshire Local Plan seeks to protect biodiversity, and the Council has an adopted Biodiversity SPD. It is noted that the Biodiversity SPD is due be updated in 2020. Therefore, it is considered that adequate local guidance already exists for biodiversity matters related to sustainable design and construction.</p>
Councils response:	
<p>Comment noted. While it is noted that a Greater Cambridge Biodiversity SPD is due to be produced, given the Council's Biodiversity Emergency declarations, it is considered appropriate to include some high level guidance on biodiversity as part of this SPD. This will be supplemented by more detailed information in the Greater Cambridge Biodiversity SPD once adopted.</p>	
34117	<p>(Object) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>U&C agrees that biodiversity is an essential part of sustainable development and that its conservation and enhancement should be considered as a key master planning element. At Waterbeach Barracks, U&C proposals will deliver a site-wide net gain in biodiversity. However, as a point of principle, the purpose of the SPD is to build upon and provide more detailed advice or guidance on policies in an adopted Local Plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan.</p> <p>As it was adopted the South Cambridgeshire Local Plan does not include a policy requirement for a net gain in biodiversity to be achieved. Therefore, U&C suggest careful re-drafting is required to</p>

	<p>ensure that the SPD is consistent with the parameters of the adopted local plans. Or the Council may consider that there is benefit in delaying the adoption of the SPD so that it can be aligned with the policies of the emerging Greater Cambridgeshire joint Local Plan which would be consistent with the updated NPPF (February 2019) (or any further updated national planning policy) and the governments emerging policies.</p>
<p>Councils response: Comment noted. However, while it is noted that the South Cambridgeshire Local Plan only encourages biodiversity net gain, national planning policy, which supersedes local plan policy in relation to biodiversity net gain, now requires a measurable net gain in biodiversity from new development. As announced in the Spring Statement, the Environment Bill will mandate biodiversity net gain. As such, the guidance in the SPD seeks to support developers in demonstrating how they have met this national policy requirement.</p>	
34084	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033] Received: 23/9/2019 via Email</p> <p>We agree that conservation is essential to sustainable development and support that conservation and enhancement of biodiversity should be considered as a key element of good planning and design. Given this residents tell us that they are surprised that you list in your 'Priority Habitats' the Chalk streams that this year in South Cambridgeshire have been so threatened .The only solution is to re access the regulatory regime and the current EA licencing system and limit Cambridge Water's abstraction.</p>
<p>Councils response: Comment noted. Chalk streams are included as a Priority Habitat in Table 3.7 of the SPD.</p>	
34069	<p>(Support) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Mrs Kati Preston [2801] Received: 23/9/2019 via Email</p> <p>Also support section 3.5 on Biodiversity. Though it is also clear that the requirement for developers to demonstrate a net gain in biodiversity cannot be fulfilled under current regulations. To meet current government targets these regulations will need to be much more stringent.</p>
<p>Councils response: Support noted. Further detailed guidance will be included in the forthcoming</p>	

<p>Greater Cambridge Biodiversity SPD, while development of the Greater Cambridge Local Plan will allow for the development of policy requiring mandatory biodiversity net gain as part of new development.</p>	
34057	<p>(Object) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>It is noted that the Biodiversity SPD is due be updated in 2020. Therefore, it is considered that adequate local guidance already exists for biodiversity matters related to sustainable design and construction. There is other legislation that specifically protects habitats and species. In any event it is a local requirement that an appropriate ecological appraisal is submitted with relevant planning applications. An ecological appraisal would typically identify protected species and habitats, and propose mitigation measures to deal with significant impacts and propose biodiversity enhancement measures. In these circumstances it is not necessary to duplicate existing legislation and national and local guidance in the draft SPD.</p> <p>Requested Change To delete Section 3.5, and refer to biodiversity matters in a revamped Sustainability Statement with reference to other national and local guidance including Appendix J in the Cambridge Local Plan and the South Cambridgeshire Biodiversity SPD (as amended).</p>
<p>Councils response:</p> <p>Comment noted. While it is noted that a Greater Cambridge Biodiversity SPD is due to be produced, given the Council's Biodiversity Emergency declarations, it is considered appropriate to include some high level guidance on biodiversity as part of this SPD. This will be supplemented by more detailed information in the Greater Cambridge Biodiversity SPD once adopted.</p>	
34015	<p>(Object) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>It is noted that the Biodiversity SPD is due be updated in 2020. Therefore, it is considered that adequate local guidance already exists for biodiversity matters related to sustainable design and construction. In addition, Section ID. 8 of the Planning Practice Guidance provides detailed guidance on the natural environment, including biodiversity. There is other legislation that specifically protects habitats and species. In any event it is a local requirement that an appropriate ecological appraisal is submitted with relevant planning applications. An</p>

	<p>ecological appraisal would typically identify protected species and habitats, and propose mitigation measures to deal with significant impacts and propose biodiversity enhancement measures. In these circumstances it is not necessary to duplicate existing legislation and national and local guidance in the draft SPD.</p> <p>Requested Change To delete Section 3.5, and refer to biodiversity matters in a revamped Sustainability Statement with reference to other national and local guidance including Appendix J in the Cambridge Local Plan and the South Cambridgeshire Biodiversity SPD (as amended).</p>
<p>Councils response: Comment noted. While it is noted that a Greater Cambridge Biodiversity SPD is due to be produced, given the Council's Biodiversity Emergency declarations, it is considered appropriate to include some high level guidance on biodiversity as part of this SPD. This will be supplemented by more detailed information in the Greater Cambridge Biodiversity SPD once adopted.</p>	
33999	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email</p> <p>Whilst the installation of nest boxes and green roofs can make a contribution towards delivery of biodiversity net gain, emphasis should be placed on encouraging the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations in accordance with paragraph 174 of the NPPF. Net gain should aim to protect or buffer core sites, enhance connectivity and provide ecological stepping stones for species, guided by the objectives of the Cambridgeshire Green Infrastructure Strategy. The policy should also recognise that net gain projects provide opportunities to deliver other benefits to local people and the environment e.g. providing new and enhanced accessible greenspace, to meet people's needs and to provide alternatives to visiting more sensitive sites, sustainable drainage, outdoor learning opportunities, landscape and amenity enhancements.</p>
<p>Councils response: Comment noted. The intention of this paragraph is to highlight that biodiversity enhancement measures can apply to all scales of development. However, additional reference will be added to paragraph 3.5.2 of the SPD to encourage the preservation, restoration of priority habitats, ecological networks and the protection of recovery of priority species. Further detailed guidance will be provided in the forthcoming Greater Cambridge Biodiversity SPD.</p>	

<p>Change to the SPD:</p> <p>Add a new first sentence to paragraph 3.5.2 to read:</p> <p><u>National policy promotes the role of new development in the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations.</u></p>	
33998	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email</p> <p>Natural England is generally supportive of the requirements and guidance on delivering measurable biodiversity net gain and signposting to the Defra biodiversity metric and the Natural Cambridgeshire's 'Developing with Nature Toolkit'. However, we advise that reference should be made to the recently launched Doubling Nature vision. This is an ambitious but deliverable vision supported by the Cambridgeshire councils; our advice is that this section of the SPD should set requirements / guidance to enable its delivery through development.</p>
<p>Councils response:</p> <p>Comment noted. Reference to the Councils support of the Doubling Nature Vision is to be added to paragraph 3.5.1 and 3.5.16 of the SPD. However, further guidance on how this Vision can be achieved will be informed by work shortly to be commissioned to support the development of the Greater Cambridge Local Plan and production of the Greater Cambridge Biodiversity SPD. As such, it is too early to include reference to such guidance in the Greater Cambridge Sustainable Design and Construction SPD.</p>	
<p>Change to the SPD:</p> <p>Add a final sentence to paragraph 3.5.1 to read:</p> <p><u>The Councils have signed up to the Natural Cambridgeshire Doubling Nature Vision, which seeks to double the area of rich wildlife habitats and natural green space across Cambridgeshire and Peterborough.</u></p> <p>Add the following document to the guidance contained at paragraph 3.5.16:</p> <ul style="list-style-type: none"> • <u>Natural Cambridgeshire (2019). Doubling Nature. A Vision for the Natural Future of Cambridgeshire and Peterborough in 2050. Available online at: https://naturalcambridgeshire.org.uk/wp-content/uploads/2019/07/Doubling-Nature-LR.pdf</u> 	
33997	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009]</p>

	<p>Received: 23/9/2019 via Email</p> <p>Section 3.5.13 describes the Wildlife Assessment checklist and may be better included under the 'Submission requirements' heading.</p>
<p>Councils response:</p> <p>Comment noted. Paragraph 3.5.13 will be moved to the end of the Submissions requirements section.</p>	
<p>Change to the SPD:</p> <p>Move paragraph 3.5.13 to follow paragraph 3.5.10 and renumber accordingly.</p>	
33996	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009]</p> <p>Received: 23/9/2019 via Email</p> <p>CIEEM guidelines for Ecological Impact Assessment address the 'requirement' detailed in section 3.5.8 (and those in tables 3.6 and 3.7) and advocates the ecological mitigation hierarchy whereby measures to avoid adverse impact should be applied wherever possible; mitigation measures should be implemented where it is not possible to avoid impact and compensatory measures should be used only as a last resort. We welcome the requirement for application of the mitigation hierarchy through the sustainability checklists (Appendix 1); however, the document would benefit from explanation of the ecological mitigation hierarchy.</p>
<p>Councils response:</p> <p>Comment noted. Reference to the ecological mitigation hierarchy will be added to the SPD.</p>	
<p>Change to the SPD:</p> <p>Add the following to paragraph 3.5.8 of the SPD:</p> <p>Assessment should detail the possible impacts upon the application site's wildlife and how the applicant has taken account of such impacts. <u>We would advocate the use of the ecological mitigation hierarchy, which is a tool that guides users towards limiting as far as possible the negative impacts on biodiversity from development projects. It is a sequential approach that emphasises best practice of avoiding and minimising any negative impacts, and then restoring sites no longer used by a project, before finally considering offsetting residual impacts.</u> Where proposals are being made for mitigation and/or compensation measures, full details of how such measures will be effective need to be proved with the application.</p>	
33995	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009]</p>

	<p>Received: 23/9/2019 via Email</p> <p>Section 3.5.7 - we suggest that the requirement should be for ecological survey and assessment undertaken in accordance with recognised Chartered Institute of Ecology and Environmental Management (CIEEM) best practice guidance and with reference to Natural England's standing advice for protected species.</p>
	<p>Councils response:</p> <p>Comment noted. Reference to undertaking ecological surveys and assessment in line with recognised CIEEM guidance will be added to paragraph 3.5.7 of the SPD.</p> <p>Change to the SPD:</p> <p>Amend paragraph 3.5.7 to read:</p> <p>All <u>ecological</u> surveys and assessments should be carried out:</p> <ul style="list-style-type: none"> • By suitably experienced, trained and qualified ecologists; • At appropriate times of year, in suitable weather conditions – surveys conducted outside optimal times may be unreliable • To published guidelines and methodologies <u>from the Chartered Institute of Ecology and Environmental Management (CIEEM) with reference to Natural England's standing advice for protected species</u> • To an appropriate level of scope and detail <p>Appointing an ecologist to survey a site early in the design process will be important in order to avoid costly delays later. They will also be able to advise on enhancement options, working in collaboration with other disciplines including architects, landscape architects and drainage consultants.</p>
33994	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email</p> <p>We note that both Local Plans require new development to protect and enhance biodiversity. Natural England is therefore supportive of the additional SPD requirement for submission of a Preliminary Ecological Appraisal and Protected Species Survey. In most situations a preliminary ecological appraisal, carried out by a professional ecologist, is likely to be required to confirm the site's ecological status and to inform those scenarios described in sections 3.5.5. The additional guidance provided in section 3.5.6 may not be required given that the primary purpose of preliminary ecological survey is to identify the need for more detailed survey work.</p>
	<p>Councils response:</p> <p>Comment noted. References to Preliminary Ecological Assessment will be updated to refer to Ecological Impact Assessment following representations received from the Wildlife Trust.</p>

Change to the SPD:

Amend all references to Preliminary Ecological Assessment to read Ecological Impact Assessment.

(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019

Respondent: **Natural England (Janet Nuttall) [1009]**

Received: **23/9/2019 via Email**

33993 Natural England supports recognition that the importance of delivering biodiversity net gain is acknowledged in the recently updated NPPF and the Government's 25 Year Environment Plan. We suggest that this section is updated with reference to Government's intention to use the forthcoming Environment Bill to mandate delivery of biodiversity net gain.

Councils response:

Support noted. Paragraph 3.5.2 will be amended to include reference to the Environment Bill.

Change to the SPD:

Amend the final sentence of paragraph 3.5.2 to read:

More widely, government has included this within the 25 Year Environment Plan, with the Spring Statement announcing that the forthcoming Environment Bill will mandate the delivery of biodiversity net gain from new development potential to change national planning policy to make these gains mandatory.

(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019

Respondent: **Natural England (Janet Nuttall) [1009]**

Received: **23/9/2019 via Email**

33992 Section 3.5.10 and Appendix 1 (Sustainability Checklists) should reference the need for development likely to affect a European site to be accompanied by sufficient information to enable the LPA, as Competent Authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), to record its decision with regard to likely significant effect and to undertake Appropriate Assessment where necessary.

Councils response:

Comment noted. The SPD will be amended to include reference to development affecting European Sites.

Change to the SPD:

Add an additional sentence to the end of paragraph 3.5.10 to read:

Development likely to affect a European site will need to be accompanied by sufficient information to enable the LPA, as Competent Authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), to record its decision with regard to likely significant effect and to undertake Appropriate Assessment where necessary. Designated sites include:

- European designated sites - Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites.
- Nationally designated sites - Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNR) and Marine Conservation Zone (MCZ).
- Locally designated sites - e.g. County Wildlife Sites (CWS).

Add an additional question to the Biodiversity sections of Appendix 1a and 1b as follows:

Bio.10 For development likely to affect a European site, what information have you provided to enable the local planning authority, as Competent Authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended) to record its decision with regard to likely significant effect, including undertaking Appropriate Assessment where necessary?

(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019

Respondent: **Natural England (Janet Nuttall) [1009]**

Received: **23/9/2019 via Email**

33991 The guidance, e.g. section 3.5.10, could also provide better emphasis on the requirement to protect and enhance statutorily designated sites and the protected sites hierarchy as identified in paragraph 171 of the National Planning Policy Framework (NPPF) NPPF. Whilst this is implicit within Table 3.7 a description of these sites could be included (recommended text included in full response)

Councils response:

Comment noted. Reference to these sites will be included in paragraph 3.5.10 of the SPD:

Change to the SPD:

Add an additional sentence to the end of paragraph 3.5.10 to read:

Development likely to affect a European site will need to be accompanied by sufficient information to enable the LPA, as Competent Authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), to record its decision with regard to likely significant effect and to undertake Appropriate Assessment where necessary. Designated sites include:

- European designated sites - Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites.

	<ul style="list-style-type: none"> • <u>Nationally designated sites - Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNR) and Marine Conservation Zone (MCZ).</u> • <u>Locally designated sites - e.g. County Wildlife Sites (CWS).</u>
33990	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email</p> <p>Natural England fully supports recognition of biodiversity as an essential part of sustainable development, although we recommend that this section is entitled 'Biodiversity and Geodiversity', noting that protection of geodiversity is appropriately referenced throughout the section.</p>
<p>Councils response: Comment noted. Section 3.5 will be renamed Biodiversity and Geodiversity</p> <p>Change to the SPD: Amend the title of Section 3.5 to read Biodiversity <u>and Geodiversity</u>. Update contents page and Sustainability Checklist references.</p>	
33957	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Environment Agency (Mr Chris Swain) [4745] Received: 23/9/2019 via Email</p> <p>Section 3.5.8; along with mitigation and/or compensation measures, this paragraph could also mention providing details of how a proposal will avoid species and habitats present on a site, and how existing features will be protected and incorporated into the development.</p> <p>Table 3.6; there are two columns that indicate surveys are required but no species are listed in the header/footer; no survey requirements have been indicated in the Other BAP species column; potentially include survey requirement for Great Crested Newt under 'proposals affecting or within 25m of rivers, streams, lakes, or other aquatic habitats', as GCNs may use this habitat.</p> <p>Along with survey requirements for designated and priority sites, a Water Framework Directive (WFD) assessment may also be required for development projects that could impact on WFD waterbodies. A project should not lead to a deterioration in current waterbody status or prevent a waterbody from achieving the required status.</p> <p>It may be beneficial to mention invasive non-native species (INNS) and the importance of biosecurity within the SPD. Adopting appropriate biosecurity measures during development projects will reduce the risks associated with INNS.</p>
<p>Councils response:</p>	

Comments noted. Reference to the use of the ecological mitigation hierarchy has been added to paragraph 3.5.8 of the SPD, which places avoidance at the top of the hierarchy.

Table 3.6 will be amended as suggested.

Reference to the Water Framework Directive will be included in paragraph 3.5.10.

Reference to biosecurity and invasive non-native species will be added to the Green Infrastructure section of the SPD.

Change to the SPD:

Amend table 3.6 to remove empty columns and add survey requirements for other BAP species (see table at the end of this response section).

Add additional text to the end of paragraph 3.5.10 to read:

Development likely to affect a European site will need to be accompanied by sufficient information to enable the LPA, as Competent Authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), to record its decision with regard to likely significant effect and to undertake Appropriate Assessment where necessary. Designated sites include:

- European designated sites - Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites.
- Nationally designated sites - Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNR) and Marine Conservation Zone (MCZ).
- Locally designated sites - e.g. County Wildlife Sites (CWS).

A Water Framework Directive (WFD) assessment may also be required for development projects that could impact on WFD waterbodies. A project should not lead to the deterioration in current waterbody status of prevent a waterbody from achieving the required status.

Add the following bullet point to paragraph 3.4.21 of the SPD:

- Adopting appropriate biosecurity measures during development projects to reduce the risks associated with invasive non-native species.

33949	<p>(Object) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cam Valley Forum (Stephen Tomkins) [7220] Received: 23/9/2019 via Email</p> <p>Conservation is indeed essential to sustainable development and we</p>
-------	--

	<p>heartily agree that the conservation and enhancement of biodiversity should be considered as a key element of good planning and design. It is therefore the more surprising that you list in your 'Priority Habitats' the 'Chalk streams' that this year in South Cambs have been threatened to such a degree. They are really special and in 2019 have come close to annihilation by over-abstraction from the Chalk aquifer. The only solution is to reassess the current EA licencing system and limit Cambridge Water's abstraction. Please read the "River Cam Manifesto".</p>
<p>Councils response: Comment noted. Chalk streams are included as a Priority Habitat in Table 3.7 of the SPD.</p>	
33937	<p>(Comment) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cambridge Past, Present & Future (Mr James Littlewood) [8127] Received: 23/9/2019 via Email</p> <p>There is a tendency to keep mentioning the provision of nest boxes as a form of biodiversity mitigation. There is nothing wrong with this per se, however birds (and bats and insects) can only use these boxes if they have sufficient food nearby - if they don't then the box is useless. We would like to see the SPD giving greater emphasis to providing habitat that can support biodiversity - ponds, trees, planting climbing plants up walls and fences, etc, etc. In many cases it is the loss of habitat that is causing species decline, not the lack of nesting sites.</p>
<p>Councils response: Comment noted. The intention of this paragraph is to highlight that biodiversity enhancement measures can apply to all scales of development. However, additional reference will be added to paragraph 3.5.2 of the SPD to encourage the preservation, restoration of priority habitats, ecological networks and the protection and recovery of priority species. Further detailed guidance will be provided in the forthcoming Greater Cambridge Biodiversity SPD.</p> <p>Change to the SPD: Add a new first sentence to paragraph 3.5.2 to read: <u>National policy promotes the role of new development in the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations.</u></p>	
33932	<p>(Object) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: The Wildlife Trust BCNP (Miss Sian Williams) [1071]</p>

	<p>Received: 23/9/2019 via Email</p> <p>There are a number of references within the section to submission requirements including a Preliminary Ecological Assessment/Appraisal</p> <p>These references to Preliminary Ecological Assessments should all be changed to refer to Ecological Impact Assessments. In accordance with best practice guidance, the appropriate report to accompany a planning application is normally an Ecological Impact Assessment, not a Preliminary Ecological Appraisal.</p> <p>The appropriate guidance for reference in section 3.5.16 can be found at https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/</p>
	<p>Councils response:</p> <p>Support this proposed revision as it puts greater emphasis on proposed avoidance, mitigation and how net gain will be addressed.</p> <p>Change to the SPD:</p> <p>Amend all references to Preliminary Ecological Assessment to read Ecological Impact Assessment.</p> <p>Amend the eighth bullet point in paragraph 3.5.6 to read:</p> <ul style="list-style-type: none"> • CIEEM Guidelines for Preliminary Ecological Appraisal (2013). Available online at: https://cieem.net/resource/guidance-on-preliminary-ecological-appraisal-gpea/ • <u>CIEEM Guidelines for Ecological Impact Assessment (EclA)(September 2018).</u> Available online at: https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/
33903	<p>(Object) Section 3: Policy Implementation, 3.5 Biodiversity - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109]</p> <p>Received: 23/9/2019 via Web</p> <p>Need to offer a map showing biodiversity and geodiversity important sites?</p> <p>Most Cottenham sites will need at least a preliminary desktop assessment - could these be pre-packed in some way to minimise cost through duplication?</p> <p>Desktop assessments are wasteful when repeated for each property in an area.</p>

Councils response:

Comments noted. Designated sites are shown on the Local Plan policies maps, which are available on the Councils websites. With regards to preliminary desktop assessments, it is important that the information within these is up to date, and as such each proposal will need to instigate a desktop search from the Cambridgeshire and Peterborough Environmental Records Centre.

Section 3.6: Pollution

34136	<p>(Object) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>Overall it is considered that Section 3.6 contains too much topic specific information, rather than focussing on the particular aspects of the topic that are relevant to sustainable design and construction. It appears that Section 3.6 has not been subject to any editorial control to provide practical and specific guidance for applicants. It is noted that the Planning Practice Guidance already provides detailed guidance on air quality and noise; see Section ID. 32 on Air Quality and Section ID. 30 on Noise. There is a Noise Policy Statement for England, and various standards and good practice guidance on air quality and noise used by Environmental Health Officers. In addition, the local list of document requirements for planning applications already specifies when an air quality assessment and noise assessment needs to be submitted. It is clear that air quality and noise assessments are required in a limited range of circumstances, and therefore the requirements for the submission of these documents in the draft SPD are inconsistent with the local list and must be rectified in order to provide clear and consistent advice to applicants.</p>
-------	---

Councils Response:

Comments noted.

Air Quality:

Whilst National Planning Practice Guidance (PPG) on Air Quality and industry standards / best practice guidance such as the document 'Land-Use Planning & Development Control: Planning For Air Quality (EPUK / IAQM, 2017 v1.2)' have some useful information and guidance, they do not have the detail required for the current approach to air quality in a region such as Cambridge City Council and the Greater Cambridgeshire area, which is experiencing significant growth.

There are various measures contained within the Cambridge City Air Quality Action Plan 2018 – 2023 (Cambridge City Council, 2018- Version 2, 2019

update) that are represented within policy 36: Air quality, odour and dust and 82: Parking management of the Cambridge Local Plan, 2018. These measures form part of our contribution to ensuring that this level of growth does not mean that air quality gets worse and to secure opportunities for improvements, in accordance with the NPPF. This is a public health matter. National approaches are relevant, but the purpose of Local Plans is to take local circumstances into account, reflecting the character, needs and opportunities of each area.

The details in the SPD build upon and provide more detailed advice or guidance on the policies in the Local Plans and have been carefully designed to be informative but concise. Environmental Health officers are routinely involved in pre-application discussions and can provide clarification if required as part of this process. The Local List requirements will be updated in due course when the SPD has been adopted.

Noise:

The National Planning Practice Guidance (PPG) on Noise advises on how planning can manage potential noise impacts in new development. The PPG promotes the principles of good acoustic design early in the planning process, encourages opportunities to make improvements to the current acoustic environment and provides examples of noise mitigation. Noise is a crucial issue in sustainable design and construction. However, the guidance provides only generic advice on the principles to be considered and only refers to broad and typical types of noise mitigation that could be considered to address the adverse effects of noise. The PPG states that due to the subjective nature of noise, there is not a simple relationship between noise levels and the impact on those affected.

The Noise Policy Statement for England (with Explanatory Note) published on the 15th March 2010, sets out the overarching long term vision of government noise policy with aims, to promote good health and a good quality of life through the management of noise. It acknowledges that unlike air quality, there are currently no European or national noise limits which have to be met, although there can be specific local limits set for specific developments. Other various British standards and industry good practice guidance on noise have also been produced to provide practitioners with guidance on a recommended approach to the management of noise within the planning system in England. Although recommended noise levels in terms of absolute and relative noise increases are provided in some cases, these are only guidance levels.

Plan makers must have regard to national policies and advice contained in the PPG when developing their plans. Therefore, local and neighbourhood plans may reflect what the guidance says about certain topics. The purpose of any SPD is to build upon, expand and provide more detailed advice or guidance on the policies in the Local Plan and how they should be interpreted and implemented to help make and support decisions on planning applications. They give further detailed guidance to the public, applicants and developers when making planning applications.

The PPG states that *'Plans may include specific standards to apply to various forms of proposed development and locations in their area. Care should be taken, however, to avoid these being applied as rigid thresholds, as specific circumstances may justify some variation being allowed.'* (Paragraph: 007 Reference ID: 30-007-20190722 - Revision date: 22 07 2019). As a result, it is the Councils' view that whilst current Government planning and noise policy and guidance set clear objectives they do not prescribe specific numerical acoustics standards in terms of likely planning acceptability or otherwise and allow a range of different approaches to be used. Also there is no specific guidance on the circumstances when a noise assessment should be undertaken and for how long and how it should be undertaken, to ensure it is robust to allow an informed decision to be reached, including consideration of appropriate noise mitigation.

Noise is very technical issue and is not an exact science. The management of potential noise impacts in new development is open to various interpretations. The detailed guidance as per the SPD tries to ensure that the required information is submitted when and where necessary, to allow an informed decision to be reached and ensure adequate mitigation when appropriate. This should also reduce any delays in determination. This is the purpose of the SPD and it is our view that it provides local practical and specific guidance for applicants.

The current Local List requirements for noise are broadly consistent with proposed SPD and will be updated in due course when the SPD has been adopted. The SPD elaborates on when a noise assessment is required and it is advisable to follow to ensure applications can be considered duly made and validated with all the necessary requirements.

34118	<p>(Comment) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>The delivery of new transport infrastructure supporting high quality public transport connectivity alongside strategic development is a key factor in reducing emissions associated with transport movements. However, it is acknowledged that electric and low emission vehicles will remain as a proportion of the mode share for large scale developments. On this basis, it is sensible to plan for provision within new development to ensure that a growing and future need for electric vehicle (EV) charging points is met. However, the planning for the infrastructure demands for the delivery of EV charging to meet the standards of the SPD is required at an early stage and for large scale development can result in a substantial infrastructure burden to be accommodated. Therefore, in this context, further clarity within the SPD is necessary helpful to define the type/specification/energy demands of EV charging required for specific uses.</p>
-------	--

Councils response:	
Comments noted. As there are two separate Local Plans with slightly different Air Quality policy requirements, therefore there are two SPD sections, one for Air Quality - Cambridge and Air Quality – South Cambridgeshire. For developments in Cambridge, Table 3.13 of the SPD already makes reference to consideration of capacity constraints in relation to the provision of rapid charge infrastructure. Table 3.20, which considers developments in South Cambridgeshire, makes reference to the provision of fast or rapid charge points where possible. It is recognised that grid capacity constraints can impact on the provision of electric vehicle charging infrastructure, and we would recommend that where this is the case, this be raised as part of pre-application discussions so that alternative options can be considered in line with the requirements set out in paragraphs 3.1.3 and 3.1.4 of the SPD.	
34099	<p>(Object) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email 3.6.20. need to add "and conservation areas".</p>
Councils response:	
Comments noted. While officers within Environmental Health focus on the impacts of artificial lighting on human health and the quality of life amenity effects, other officers within the Built and Natural Environment Team would consider the impacts of artificial lighting on heritage assets and conservation areas. Additional test will be added to the SPD.	
Change to the SPD:	
Amend paragraph 3.6.20 to add "and conservation areas", to read as follows:	
Consideration should be given to lighting associated with buildings of special historic and architectural interest in order to protect their special interest <u>avoid harm to the significance of the heritage asset and that of the wider area, including conservation areas.</u> This applies both to the lighting of such buildings and the impact of the lighting installation when seen by day.	
34075	<p>(Comment) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: South Cambridgeshire District Council (Mr Nick Lockley) [8142] Received: 23/9/2019 via Email The support for promoting low emissions vehicles is noted. Again, subject to finances and the necessary consents, The New Build Team could ensure all new homes have access to electric charge points.</p>
Councils response:	
Support noted. It is recognised that grid capacity constraints can impact on the provision of electric vehicle charging infrastructure, and we would	

recommend that where this is the case, this be raised as part of pre-application discussions so that alternative options can be considered in line with the requirements set out in paragraphs 3.1.3 and 3.1.4 of the SPD.

34072	<p>(Object) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mrs Kati Preston [2801] Received: 23/9/2019 via Email</p> <ol style="list-style-type: none">1. As the document states "there are no safe levels of air pollution", and air pollution is a risk to life itself.2. The requirement for new developments to have charging points for electric vehicles is welcome. But this on its own is not sufficient to make an impact on the overall increase in the number of vehicles arising from new development, on the roads of Cambridge. Poor and very poor levels of pollution faced by Cambridge residents each and every day will be exacerbated.3. The greater harm from diesel particulates.4. Adoption of an existing by-law making it illegal for people to idle their engines while stationary.5. Need for charging points for electric vehicles to be much more widely available.
-------	--

Councils response:

Concerns noted. As an SPD, the focus of the document is on the implementation of planning applications, and as such measures proposed within the document are limited to proposed new developments. The planning regime cannot be used to duplicate other control mechanisms under separate legislation

Cambridge City Council has an Air Quality Action Plan (AQAP) which includes other measures to improve air quality not related to the planning regime. The AQAP notes that growth in the region will lead to an increase in traffic and pollution if measures are not taken to provide alternative. The Combined Authority has the responsibility for strategic transport matters, so the outcome of its Local Transport Plan is key.

Cambridge City Council has regularly considered taking up the powers to enforce against drivers idling unnecessarily while a vehicle is stationary on a public road, but has not done so because:

a) our studies have shown that most air pollution in Cambridge is a result of the volume of traffic, so we are focussing efforts on reducing traffic and lowering the emissions from buses and taxis in the city centre.

b) enforcement would be practically difficult and also costly for any resultant benefit that may arise. For

example, <https://airqualitynews.com/2019/03/07/exclusive-idling-enforcement-branded-not-fit-for-purpose-as-just-a-handful-of-fines-issued-during-2018/>

c) we do conduct a number of activities and programmes that promote air quality improvements. These are detailed in our Air Quality Action Plan (<https://www.cambridge.gov.uk/air-quality-action-plan>).

Cambridge City Council also adopted an Electric Vehicle and Electric Vehicle Charging Strategy in October 2019, which identifies key areas where this council in the future can act to support the transition to electric vehicles.

34058	<p>(Object) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>Overall it is considered that Section 3.6 contains too much topic specific information, rather than focussing on the particular aspects of the topic that are relevant to sustainable design and construction. It appears that Section 3.6 has not been subject to any editorial control to provide practical and specific guidance for applicants. There is a Noise Policy Statement for England, and various standards and good practice guidance on air quality and noise used by Environmental Health Officers. In addition, the local list of document requirements for planning applications already specifies when an air quality assessment and noise assessment needs to be submitted. It is clear that air quality and noise assessments are required in a limited range of circumstances, and therefore the requirements for the submission of these documents in the draft SPD are inconsistent with the local list and must be rectified in order to provide clear and consistent advice to applicants.</p> <p>Requested Change To substantially edit Section 3.6 so that it simply identifies and directs applicants, statutory consultees and other users to the relevant national guidance and other advice. Air quality and noise matters could be addressed in a revamped Sustainability Checklist.</p>
-------	--

Councils response:

Comments noted. No changes are considered necessary for the SPD for the reasons set out below.

Air Quality:

Whilst National Planning Practice Guidance (PPG) on Air Quality and industry standards / best practice guidance such as the document 'Land-Use Planning & Development Control: Planning For Air Quality (EPUK / IAQM, 2017 v1.2)' have some useful information and guidance, they do not have the detail required for the current approach to air quality in a region such as Cambridge City Council and the Greater Cambridgeshire area, which is experiencing significant growth.

There are various measures contained within the Cambridge City Air Quality Action Plan 2018 – 2023 (Cambridge City Council, 2018- Version 2, 2019 update) that are represented within policy 36: Air quality, odour and dust and 82: Parking management of the Cambridge Local Plan, 2018. These measures form part of our contribution to ensuring that this level of growth does not mean that air quality gets worse and to secure opportunities for improvements, in accordance with the NPPF. This is a public health matter. National approaches are relevant, but the purpose of Local Plans is to take local circumstances into account, reflecting the character, needs and opportunities of each area.

The details in the SPD build upon and provide more detailed advice or guidance on the policies in the Local Plans and have been carefully designed to be informative but concise. Environmental Health officers are routinely involved in pre-application discussions and can provide clarification if required as part of this process. The Local List requirements will be updated in due course when the SPD has been adopted.

Noise:

The National Planning Practice Guidance (PPG) on Noise advises on how planning can manage potential noise impacts in new development. The PPG promotes the principles of good acoustic design early in the planning process, encourages opportunities to make improvements to the current acoustic environment and provides examples of noise mitigation. Noise is a crucial issue in sustainable design and construction. However, the guidance provides only generic advice on the principles to be considered and only refers to broad and typical types of noise mitigation that could be considered to address the adverse effects of noise. The PPG states that due to the subjective nature of noise, there is not a simple relationship between noise levels and the impact on those affected.

The Noise Policy Statement for England (with Explanatory Note) published on the 15th March 2010, sets out the overarching long term vision of government noise policy with aims, to promote good health and a good quality of life through the management of noise. It acknowledges that unlike air quality, there are currently no European or national noise limits which have to be met, although there can be specific local limits set for specific developments. Other various British standards and industry good practice guidance on noise have also been produced to provide practitioners with guidance on a recommended approach to the management of noise within the planning system in England. Although recommended noise levels in terms of absolute and relative noise increases are provided in some cases, these are only guidance levels.

Plan makers must have regard to national policies and advice contained in the PPG when developing their plans. Therefore, local and neighbourhood plans may reflect what the guidance says about certain topics. The purpose of any SPD is to build upon, expand and provide more detailed advice or guidance on the policies in the Local Plan and how they should be interpreted and implemented to help make and support decisions on planning applications.

They give further detailed guidance to the public, applicants and developers when making planning applications.

The PPG states that *'Plans may include specific standards to apply to various forms of proposed development and locations in their area. Care should be taken, however, to avoid these being applied as rigid thresholds, as specific circumstances may justify some variation being allowed.'* (Paragraph: 007 Reference ID: 30-007-20190722 - Revision date: 22 07 2019). As a result, it is the Councils' view that whilst current Government planning and noise policy and guidance set clear objectives they do not prescribe specific numerical acoustics standards in terms of likely planning acceptability or otherwise and allow a range of different approaches to be used. Also there is no specific guidance on the circumstances when a noise assessment should be undertaken and for how long and how it should be undertaken, to ensure it is robust to allow an informed decision to be reached, including consideration of appropriate noise mitigation.

Noise is very technical issue and is not an exact science. The management of potential noise impacts in new development is open to various interpretations. The detailed guidance as per the SPD tries to ensure that the required information is submitted when and where necessary, to allow an informed decision to be reached and ensure adequate mitigation when appropriate. This should also reduce any delays in determination. This is the purpose of the SPD and it is our view that it provides local practical and specific guidance for applicants.

The current Local List requirements for noise are broadly consistent with proposed SPD and will be updated in due course when the SPD has been adopted. The SPD elaborates on when a noise assessment is required and it is advisable to follow to ensure applications can be considered duly made and validated with all the necessary requirements.

34043	<p>(Object) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email</p> <p>States the need for the provision of a Low Emission Strategy (LES) and Table 3.20 sets out sustainable transport measures to be included in a Low Emissions Strategy. Countryside supports the provision of a LES and electric vehicle charging however with regards to the LES insufficient flexibility is provided in relation to the scale of development. Allowance should be included for the incorporation of the LES within the DAS or Sustainability Statement depending on the scale of the development, i.e. a separate LES for major developments only. With regards to the EV charge point requirements no evidence base has been provided to support the level of provision included. Given the governments recently published consultation on Electric vehicle charging in</p>
-------	--

	residential and non-residential buildings it is recommended that the requirements are updated in line with the government's requirements once they are published.
<p>Councils response: Comment noted. The requirement for an LES applies to all major development requiring a Transport Assessment and Travel Plan and for any development where air quality is likely to be a significant issue. For smaller schemes, consideration could be given to including the LES as part of other documents such as the Design and Access Statement of Sustainability Statement, as long as the document contains all relevant information required. Such an approach should be discussed with officers as part of the pre-application process.</p> <p>With regards to the requirements for electric vehicle charging it is noted that these might change once Government has published the results of its consultation on requiring electric vehicle charging as part of Building Regulations. As the timescales for this are currently unclear, the Councils will consider the implications of this once Government have announced these results, and where necessary will produce further technical guidance to provide clarification.</p>	
34042	<p>(Object) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email Table 3.13 sets out development control measures to improve air quality, this includes details on the provision of Electric Vehicle (EV) charge points. While Countryside supports the provision of electric vehicle charging it is considered this needs to be consistent with national policy requirements. The government has recently published a consultation of Electric vehicle charging in residential and non-residential buildings which is proposing the deployment of charge points in all new buildings, requirements for charging infrastructure in redevelopments and non-residential development requirements. It is recommended that the proposed development management requirements are updated in line with the government's requirements once they are published.</p>
<p>Councils response: Comment noted. It is noted that the requirements set out in Table 3.13 might be subject to change once Government has published the results of its consultation on requiring electric vehicle charging as part of Building Regulations. As the timescales for this are currently unclear, the Councils will consider the implications of this once Government have announced these results, and where necessary will produce further technical guidance to provide clarification.</p>	
34030	<p>(Comment) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and</p>

Construction SPD - July 2019

Agent: No. 6 Developments (Mr Richard Oakley) [8140]

Respondent: **Cambridge University Hospital NHS Foundation Trust (Carin Charlton) [8141]**

Received: **23/9/2019 via Email**

CUH is committed to being a good neighbour, and encouraging health and wellbeing of communities more generally. However, due to operational requirements, such as the need for lighting 24/7 across buildings or areas of the campus to ensure the safety of our patients and visitors. Some elements of the SPD are difficult to apply. As such, it is considered that the SPD should outline some exceptions where alternative approaches may be permissible (when justified on a case by case basis).

It is appreciated to see that this section of the SPD recognises the sensitivity of a hospital site and the need to ensure odour or noise polluting uses are not located adjacent to a hospital or clinical site.

Councils response:

Comments noted. The SPD Pollution sections are technical in nature and detail the Council's preferred approach to assessment and requirements for mitigation, as appropriate. However, it is acknowledged that care should be taken, to avoid various requirements being applied as absolute rigid standards or thresholds, as specific circumstances may justify some variation being allowed. Providing full justification is provided for any deviation from requirements detailed in the SPD, then the Council's will consider the particular circumstances of each case on its merits. This is in line with the requirements set out in paragraphs 3.1.3 and 3.1.4 of the SPD, which give consideration to feasibility and viability. However, ultimately unacceptable adverse impact on health and quality of life / amenity should not arise. As a wide range of site specific circumstances can arise, it is our view that it is inappropriate to outline specific exceptions at where alternative approaches may be permissible. Ambiguity may arise and justification for deviation from the SPD will be required on a case by case basis.

This should be reflected in the SPD pollution section generally and the amended wording below is recommended.

Change to the SPD:

Amend para 3.6.1 to read

3.6.1 The planning system has an important role to play in ensuring that new and existing development does not contribute, or be put at risk from, unacceptable levels of pollution. Where possible, development should also help to improve local environmental conditions such as air quality and remediate and mitigate contaminated and unstable land. This section of the SPD provides further guidance in relation to policies on light pollution, contaminated land, noise pollution (including vibration), air quality and odour and other fugitive emissions. The sections below are technical in nature and detail the Councils preferred approach to assessment and requirements for mitigation, as appropriate. However, it is acknowledged that care should be taken to avoid various requirements being applied as absolute rigid standards

or thresholds, as specific circumstances may justify some variation being allowed. Providing full justification is provided for any deviation from requirements detailed in the SPD, then the Councils will consider the particular circumstances of each case on its merits. However, ultimately unacceptable adverse impact on health and quality of life/ amenity should not arise.

34016	<p>(Object) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785]</p> <p>Received: 23/9/2019 via Email</p> <p>Overall it is considered that Section 3.6 contains too much topic specific information, rather than focussing on the particular aspects of the topic that are relevant to sustainable design and construction. It appears that Section 3.6 has not been subject to any editorial control to provide practical and specific guidance for applicants. It is clear that air quality and noise assessments are required in a limited range of circumstances, and therefore the requirements for the submission of these documents in the draft SPD are inconsistent with the local list and must be rectified in order to provide clear and consistent advice to applicants.</p> <p>Requested Change</p> <p>To substantially edit Section 3.6 so that it simply identifies and directs applicants, statutory consultees and other users to the relevant national guidance and other advice. Air quality and noise matters could be addressed in a revamped Sustainability Checklist.</p>
-------	--

Councils response:
Comments noted. No changes are considered necessary for the SPD for the reasons set out below.

Air Quality:
Whilst National Planning Practice Guidance (PPG) on Air Quality and industry standards / best practice guidance such as the document 'Land-Use Planning & Development Control: Planning For Air Quality (EPUK / IAQM, 2017 v1.2)' have some useful information and guidance, they do not have the detail required for the current approach to air quality in a region such as Cambridge City Council and the Greater Cambridgeshire area, which is experiencing significant growth.

There are various measures contained within the Cambridge City Air Quality Action Plan 2018 – 2023 (Cambridge City Council, 2018- Version 2, 2019 update) that are represented within policy 36: Air quality, odour and dust and 82: Parking management of the Cambridge Local Plan, 2018. These measures form part of our contribution to ensuring that this level of growth does not mean that air quality gets worse and to secure opportunities for improvements, in accordance with the NPPF. This is a public health matter.

National approaches are relevant, but the purpose of Local Plans is to take local circumstances into account, reflecting the character, needs and opportunities of each area.

The details in the SPD build upon and provide more detailed advice or guidance on the policies in the Local Plans and have been carefully designed to be informative but concise. Environmental Health officers are routinely involved in pre-application discussions and can provide clarification if required as part of this process. The Local List requirements will be updated in due course when the SPD has been adopted.

Noise:

The National Planning Practice Guidance (PPG) on Noise advises on how planning can manage potential noise impacts in new development. The PPG promotes the principles of good acoustic design early in the planning process, encourages opportunities to make improvements to the current acoustic environment and provides examples of noise mitigation. Noise is a crucial issue in sustainable design and construction. However, the guidance provides only generic advice on the principles to be considered and only refers to broad and typical types of noise mitigation that could be considered to address the adverse effects of noise. The PPG states that due to the subjective nature of noise, there is not a simple relationship between noise levels and the impact on those affected.

The Noise Policy Statement for England (with Explanatory Note) published on the 15th March 2010, sets out the overarching long term vision of government noise policy with aims, to promote good health and a good quality of life through the management of noise. It acknowledges that unlike air quality, there are currently no European or national noise limits which have to be met, although there can be specific local limits set for specific developments. Other various British standards and industry good practice guidance on noise have also been produced to provide practitioners with guidance on a recommended approach to the management of noise within the planning system in England. Although recommended noise levels in terms of absolute and relative noise increases are provided in some cases, these are only guidance levels.

Plan makers must have regard to national policies and advice contained in the PPG when developing their plans. Therefore, local and neighbourhood plans may reflect what the guidance says about certain topics. The purpose of any SPD is to build upon, expand and provide more detailed advice or guidance on the policies in the Local Plan and how they should be interpreted and implemented to help make and support decisions on planning applications. They give further detailed guidance to the public, applicants and developers when making planning applications.

The PPG states that *'Plans may include specific standards to apply to various forms of proposed development and locations in their area. Care should be taken, however, to avoid these being applied as rigid thresholds, as specific circumstances may justify some variation being allowed.'* (Paragraph: 007 Reference ID: 30-007-20190722 - Revision date: 22 07 2019). As a result, it

is the Councils' view that whilst current Government planning and noise policy and guidance set clear objectives they do not prescribe specific numerical acoustics standards in terms of likely planning acceptability or otherwise and allow a range of different approaches to be used. Also there is no specific guidance on the circumstances when a noise assessment should be undertaken and for how long and how it should be undertaken, to ensure it is robust to allow an informed decision to be reached, including consideration of appropriate noise mitigation.

Noise is very technical issue and is not an exact science. The management of potential noise impacts in new development is open to various interpretations. The detailed guidance as per the SPD tries to ensure that the required information is submitted when and where necessary, to allow an informed decision to be reached and ensure adequate mitigation when appropriate. This should also reduce any delays in determination. This is the purpose of the SPD and it is our view that it provides local practical and specific guidance for applicants.

The current Local List requirements for noise are broadly consistent with proposed SPD and will be updated in due course when the SPD has been adopted. The SPD elaborates on when a noise assessment is required and it is advisable to follow to ensure applications can be considered duly made and validated with all the necessary requirements.

34000	<p>(Comment) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email Section on pollution/light pollution, air quality and noise should reference the need to address and mitigate impacts to sensitive ecological receptors including protected species. Noise and lighting schemes should seek to avoid ecological impacts wherever possible.</p>
-------	--

Councils response:
 Concern noted. The policies for which the SPD provides additional guidance do take into consideration impacts on sensitive ecological receptors. Reference to the impacts of lighting schemes on ecological receptors is included in paragraphs 3.6.5 and 3.6.31 of the SPD, and a specific reference to sensitive ecological receptors will be added to paragraph 3.6.44. Where relevant, such impacts will be assessed by the Councils ecology officers as part of the process of determining planning proposals.

Change to the SPD
 Add the following to paragraph 3.6.44

Noise can have a significant effect on the environment, including sensitive ecological receptors, human health and wellbeing including sleep disturbance, the amenity/quality of life experienced and enjoyed by individuals and communities and the utility of noise sensitive land uses.

33970	<p>(Comment) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email 3.6.141</p> <p>The provisions under this section could have a major impact in an overall development. Electric car provision, car clubs, and use of heat pumps for energy source all will play a major part in future sustainable developments. This requirement or advice is buried deep within this document.</p> <p>Can the consideration related to Air Quality -Cambridge Air Quality Action Plan (Maintaining Low Emissions) policy and the equivalent S Cambs policy- be given greater prominence? Allotments contained within this?</p>
<p>Councils response: Comments noted. Tables 1.2 and 1.3 in section 1 of the SPD highlight where relevant information is in the document. Allotments are not directly relevant for this paragraph (maintaining low emissions). However, they are referenced in paragraphs 3.4.16, 3.4.30 and 4.4.2.</p>	
33962	<p>(Comment) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Historic England (Mrs Debbie Mack) [5828] Received: 23/9/2019 via Email</p> <p>Noise pollution (including vibration) page 83 reference should be made in this section to that impact that noise and vibration can have on heritage assets and the need to avoid harm to the significance of assets.</p>
<p>Councils response: Concern noted. The purpose of this section of the SPD is to set out the technical requirements related to the submission of Noise Impact Assessments in order to ensure that proposals do not impact on health and wellbeing and quality of life/amenity effects. While we fully support in principle the need to address and mitigate such impacts on heritage assets and the need to avoid harm to the significance of assets, this does not fall into the requirements related to Noise Impact Assessments, and instead needs to be considered by officers within the Councils Built and Natural Environment Team, notably conservation officers.</p>	
33961	<p>(Comment) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Historic England (Mrs Debbie Mack) [5828] Received: 23/9/2019 via Email 3.6.20: We broadly welcome the reference to lighting and heritage assets. However, the wording currently states 'lighting associated with buildings of special historic and architectural interest buildings'. The paragraph should make it clear that it is not just the</p>

	<p>matter of lighting that is specifically associated with such buildings, but that lighting can have an impact on the wider setting, and hence significance, of all heritage assets. To that end, lighting schemes that may affect heritage assets of their settings require careful consideration and should be designed to avoid harm to the significance of the heritage asset.</p>
<p>Councils response: Concern noted. The purpose of this section of the SPD is to set out the technical requirements related to the submission of Lighting Impact Assessments in order to ensure that they do not impact on health and wellbeing and quality of life/amenity effects. The assessment of the impacts of lighting schemes on heritage assets is not something that is undertaken by Environmental Health Officers in assessing Lighting Impact Assessments but is instead a consideration for Conservation Officers. Paragraph 3.6.20 does make reference to the need for the lighting of heritage assets to give consideration to the impact of such proposals on their special interest and that of the wider area, but this shall be amended to make specific reference to the significance of the heritage asset and its wider area, including conservation areas.</p> <p>Change to the SPD Amend paragraph 3.6.20 to read: Consideration should be given to lighting associated with buildings of special historic and architectural interest in order to protect their special interest <u>avoid harm to the significance of the heritage asset</u> and that of the wider area, <u>including conservation areas</u>. This applies both to the lighting of such buildings and the impact of the lighting installation when seen by day.</p>	
33950	<p>(Support) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Environment Agency (Mr Chris Swain) [4745] Received: 23/9/2019 via Email In respect of groundwater and contaminated land, we support the SPD. Specifically: - We support the requirement for a Contaminated Land Assessment for land / developments with a previous potentially contaminative use as per Cambridge Local Plan (2018) Policy 33: Contaminated Land and SCDC Local Plan (2018) Policy SC/11: Contaminated Land (SPD, pp 80 to 83). - Where unacceptable risks are identified, we support land remediation through planning to render harmless any 'identified contamination with respect to the proposed end use and the surrounding environment (including controlled waters)' (p82, SPD).</p>
<p>Councils response: Support noted.</p>	
33920	<p>(Object) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD</p>

- July 2019

Respondent: **Persimmon Homes: East Midlands (MR Matthew Harmsworth) [8115]**

Received: **23/9/2019 via Web**

Electric Vehicle Charging Points and Car Club Vehicle Provision

The South Cambridgeshire Local Plan (Policy TI/3) and the Cambridge Local Plan (Policy 82) both express 'strong support' for the provision of car clubs and EV charging points or capacity for their future installation, however no specific requirements are given.

'Table 3.13: Development Control measures to improve air quality' states specific Electric Vehicle (EV) charging points and car club vehicle provision standards, which standards are support by the Air Quality Action Plan. The action plan and the requirements for numbers have not been tested through local plan examination / viability and therefore hold no weight in the decision process. Such requirements can therefore only be regarded as requests in light of Air Quality matters. Therefore while the intention is supported by the adopted local plan and development plan documentation, for negotiation and validation purposes relating to planning applications, this is still a matter for negotiation to meet policy and the local authority cannot hold applicants to these 'exact' standards as they are no specifically tested.

City Councils response:

Air Quality:

The role of the SPD is to provide further detail on the policies and to provide assistance to developers about what is expected. The requirements set out in Table 3.12, which relate to proposals in Cambridge are derived from the Councils Air Quality Action Plan 2018 – 2023 (2018 Version 2, 2019 update). The Air Quality Action Plan is in itself Cambridge City Council policy, developed in fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management developed following an extended consultation period ran during the summer of 2018, including the developers' forum. Responses received were wide-ranging and largely positive. No comments were made on any of the development control measures in the Plan.

It is important to state and re-iterate that these measures have been introduced to ensure that air pollution levels remain low or improve in the future, despite the significant growth that is planned for the region. This is a public health matter. The NPPF requires planning decisions to be consistent with local air quality action plans (paragraph 181).

It is recognised that there may be some cases where full compliance will not be possible due to technical constraints and other considerations. Where this

is the case, early engagement with the Councils Environmental Health Officers should take place as part of the pre application process in order to agree an alternative approach.

33918	<p>(Comment) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: University of Cambridge (Miss Rochelle Duncan) [7309] Received: 23/9/2019 via Web A ratio of one EVCP for every 4 spaces will provide sufficient capacity for demand from those that cannot charge their vehicles at home. Clarification sought on various aspects of the requirements related to electric vehicle charging provision.</p> <p>Internal Design Noise Levels: We ask for clarification that the acoustic standards in relation to ventilation apply to normal operating conditions and that provision of additional opening area over and above the normal operating requirement for ventilation is a positive benefit offering greater resilience and need not be subject to acoustic limitations.</p>
-------	---

Councils response:
Internal Design Noise Levels

If the comment is referring to 'Table 3.10, the noise levels in this table should be achieved to secure reasonable living conditions in terms of quality of life / amenity and protect human health (based on World Health Organisation guidance).

Paragraph 3.6.85 states: 'When windows are provided there is also a reasonable expectation by occupiers that they can open them for any reason at any time. Where the internal noise levels cannot be achieved with windows open, alternative ventilation such as mechanical ventilation heat recovery system (MVHR) **or an acoustically treated passive free area of sufficient size should be provided.** It is important to note this is not a request for air conditioning.'

Electric Vehicle Charging Definition:

A link to the definition of different types of electric vehicle charging will be added to the glossary of the SPD.

Charging Point Type and Ratios of Slow/Fast/Rapid:

The University requests some flexibility to allow for changing requirements as the technology develops; it is considered that demand for slow charging points may reduce as users would prefer to use faster electric vehicle charge points (EVCPs) to charge their vehicles in a much shorter time; the mix of

slow/fast/rapid EVCPs could be confirmed through the EVCP strategy. The requirements in the SPD are considered to be appropriate for the current situation. We intend to adapt the requirements as the situation evolves; we always assess each proposal as it comes forward on its merits.

Passive EVCP provision:

The University comments that the conversion rate for drivers switching to electric vehicles is limited by the inadequate provision of EVCP; this is known as 'range anxiety'. The EVCP provision set out in the SPD will ensure that, locally at least, there will be adequate number of charging options. To confirm that the requirement for passive provision (enabling infrastructure) is a 'safe, unobstructed route for electrical cables from a metered electrical supply point to a future connection location, to enable the installation of an electric vehicle charge point in future without the need for builders work in connection'. The future connection location should be suitable for use for electric vehicles with different charging inlet options.

Costs relating to Grid Upgrade – residential and non-residential.

The University is concerned about the cost implications of the EVCP provision requirements and would like clarification about the maximum thresholds for the cost of the average electrical capacity connection per EVCP. The costs of installation for residential and non-residential at point of build are approximately £1,000 lower than retrofit. DfT estimates for non-residential are considerably higher than residential per unit. This is something that a developer and the planning team would have to discuss on a case-by-case basis.

Rather than an exemption when the cost is over £3,600 due to required electrical capacity reinforcements, is it more sensible that a developer is charged at least the average install cost so that funding can accumulate to contribute to addressing the capacity issue. This could be used to at least part-fund some EV provision or contribute towards later schemes in the area. For example, up to £3,600 is allocated per unit – so for a development of 100 dwellings £360,000 and that this amount should be spent on as much EV provision as possible.

Relocation of car parks

The same level of installation would be required if parking is relocated from an existing car parking area to another, with the overall total of car parking spaces not increasing, as this presents an opportunity to improve the provision of EVCP in Cambridge.

Provision in non-residential car parks

The conversion rate for drivers switching to electric vehicles is limited by the inadequate provision of EVCP; this is known as 'range anxiety'. The EVCP provision set out in the SPD will ensure that, locally at least, there will be

adequate number of charging options. The requirements in the SPD are considered to be appropriate for the current situation. We intend to adapt the requirements as the situation evolves; we always assess each proposal as it comes forward on its merits.

Provision of EVCP in P&R rather than non-residential parking.

The University considers that funding for EVCP should be directed to P&R sites to reduce congestion. This is outside of the scope of the SPD, but S106 contributions to off-site funding can be considered as part of the EV strategy for a major site.

Combinations of provision in the EVCP strategy – request for further information to ensure consistency:

Officers strive to ensure that a consistent approach is achieved across Cambridge, but note that every site is different so that sometimes an approved scheme will be different. As above, we will assess each proposal on its merits.

Non-residential - ratio of rapid and fast EVCPs and car club provision:

The University requests that the ratio of rapid and fast EVCPs and the number of car club vehicles to be provided in non-residential developments should not be linked to the floorspace and instead this should be linked to the predicted travel characteristics of the development, such as the number of staff to be located on this site or the predicted number of visitors. The requirements in the SPD are considered to be appropriate for the current situation. We intend to adapt the requirements as the situation evolves; we always assess each proposal as it comes forward on its merits. Predicted travel characteristics are not always a good indicator of actual travel outcomes.

Car clubs - should they be electric where possible:

Car clubs should use electric vehicles where possible. However, we will not make this a definite requirement until there is adequate EVCP provision. However the wording of the SPD will be amended to support the prioritisation of electric vehicles for car clubs.

Change to the SPD:

Add the following definition to the glossary:

Electric Vehicle Charging: A comprehensive definition of the different types of charging is set out in the “Charging Electric Vehicles” Energy Saving Trust, 2019 publication (insert link –

<https://www.energysavingtrust.org.uk/transport/electric-cars-and-vehicles/charging-electric-vehicles> and

<https://www.energysavingtrust.org.uk/sites/default/files/23465-EST%2BDFT-Charging%20Electric%20Vehicles%20-%20Best%20Practice%20Guide-WEB.pdf>).

A slow charge point has a power rating of 3 – 7kW; it takes 4 – 8 hours for a charge using a Type 1 or Type 2 connector. A fast charge point has a power rating of 7 – 22kW; it takes 2 - 4 hours for a charge using a Type 1 (max 7kW) or Type 2 connector. A rapid charge point has a power rating up to 50kW; it takes 25 – 40 minutes for a charge using a Type 2, CCS or CHAdeMO connector.

Amend Table 3.13 as follows

Car Club provision, where appropriate

- A minimum of one car club vehicle per 500 parking spaces in new residential developments; a minimum of one vehicle per 10,000 m² in non-residential developments
- Car clubs should prioritise the use of electric vehicles
- A site-wide car club strategy for large-scale Major sites – detailing the location and phasing of the charge point installations

There may be other sites where car club provision is appropriate, for example, major development sites with little or no parking.

33902	<p>(Object) Section 3: Policy Implementation, 3.6 Pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web 68 pages?</p> <p>Light (10pp) - tutorial when submission could be reduced to a statement of need/benefit weighted against possible harm to receptors and subsequent mitigations.</p> <p>Contaminated land (3pp) - need v. harm + mitigations</p> <p>Noise / Vibration (24pp) - tutorial (mostly noise) without explanations (Grampian condition? "digital twins") check 3.6.81 and 3.6.82! Almost nothing on vibration, a major issue on Cottenham's streets (High Street and Denmark Road) where housing abuts the carriageway.</p> <p>Air Quality (32pp - mostly Cambridge) - arguments for encouraging e-infrastructure and parking provisions mostly ignored elsewhere.</p>
-------	--

Councils response:
 Comments noted. Artificial lighting, contaminated land, noise/sound (including vibration) and air quality are very technical issues that are not exact sciences. They are open to various interpretations. They warrant detailed guidance as per the SPD to ensure the required information is submitted when and where necessary, to allow an informed decision to be reached and ensure adequate mitigation when appropriate.

With regards to noise Pollution (including vibration), paragraphs 3.6.119 to

3.6.126 consider vibration, both ground borne vibration into foundations / up a building and ground / structural borne vibration which can also result in re-radiated airborne noise via building elements. It is generally considered that definition of noise also encompass and includes vibrations (both airborne and ground-borne vibration). However, amendments will be made to Appendix 8 to clarify when a ground-borne vibration assessment may be required.

Change to the SPD:

Add the following wording to Annex A of Appendix 8 (see table at the end of this section).

(i) NEW NOISE SENSITIVE DEVELOPMENT (NSD) / USES		
Type of development	Noise Report required?	Comments
New residential development and extensions to existing residential dwellings (C3 –Dwellinghouses and C4 - Houses in multiple occupation use classes)	Close to a major highway (motorways, A-class & major or busy B roads)	<p>YES</p> <p>Noise report will normally be required for residential development in proximity to a major or busy road.</p> <p><u>A site specific ground and airborne vibration assessment may also be required on a case by case basis, when abutting or very close to a road / carriageway.</u></p> <p>A noise report is unlikely to be required when noise levels fall below 50dBA LAeq16hr.</p>
	Near to a railway	<p>YES</p> <p>Noise report will normally be required for any property within several hundred meters from a major railway line.</p> <p><u>A site specific ground and airborne vibration assessment may also be required when within 30m of a railway line.</u></p> <p>A noise report is unlikely to be required when noise levels fall below 50dBA LAeq16hr.</p>
	Within the predicted 57dB contour of an airport with both a single or twin wide spaced runway	<p>YES</p> <p>Noise report will normally be required. Noise reports can be found via the DfT website.</p>
	Close to existing or proposed NGD such as agricultural,	<p><u>YES</u></p> <p>Noise report will normally be required.</p> <p><u>A site specific ground and</u></p>

	industrial, trade, commercial or business premises		<u>airborne vibration assessment may also be required on a case by case basis.</u>
10+ houses in a rural/suburban environment	Any of above	MAYBE	In certain circumstances, a noise report will be required. Please consult with Environmental Health Department.
Change of use to residential		MAYBE	Noise report may be required, for example if there are existing noise sources in close proximity. Please consult with the LPA.
Hotels, guest houses, etc (C1 uses)		MAYBE	<p>Hotels, guest houses and residential institutions can also present a new noise source.</p> <p>Consequently, if such a development is proposed in close proximity to existing residential uses, a noise report may be required.</p>
Residential institutions: C2 uses (care homes, hospitals, nursing homes, residential colleges, etc), and C2a uses (secure residential institutions including prisons, secure hospitals)		MAYBE	
			<p>It is the responsibility of the developer to ensure hotel rooms meet reasonable noise standards. However, if the hotel/ guest house includes long term residential accommodation for staff or is an aparthotel, a noise report may be required.</p>

(i) NEW / ADDITIONAL NOISE GENERATING DEVELOPMENT (NGD) SOURCES		
Type of development	Noise Report required?	Comments
INDUSTRIAL TYPE USES (e.g. B2 general industrial uses, B8 storage or distribution uses, Waste management sites, Minerals development, access roads & haul roads)	YES	<p>Noise report will normally be required. Please consult with LPA if there are no existing noise sensitive premises in close proximity.</p> <p><u>A site specific ground and airborne vibration assessment may also be required on a case by case basis.</u></p> <p>However, noise may need <u>to be controlled / mitigated</u> to limit creeping background noise levels in the general area.</p> <p>Includes new development and changes of use. Also includes changes in operations or layout, extensions or new equipment at</p>

		existing sites.
ENTERTAINMENT/ FOOD & DRINK, ETC (e.g. A3 uses - restaurants/ cafes, A4 - drinking establishments, A5 - hot food a takeaway, D2 uses e.g. cinemas, concert halls, swimming baths, skating rinks, gymnasiums, sports halls. Also dance halls, casinos, theatres, amusement centres).	YES	Noise report will normally be required. Please consult with LPA if there are no existing noise sensitive premises in close proximity. However, noise may need <u>to be controlled / mitigated</u> to be limit creeping background noise levels in general area. Includes new heating, ventilation, and air conditioning (HVAC) including combustion appliance / exhaust stacks and flues and air handling/refrigeration / chiller units, machinery, plant and equipment and extractor fans at new and existing. The noise impact of car parking / vehicular movements should also be considered
OUTDOOR SPORTS & RECREATION Including some D2 class uses, also multi-use games areas, motor sports and shooting ranges.	YES	Noise report will normally be required.
COMMERCIAL USES A1 and A2 uses (shops and financial/ professional services, etc)	MAYBE	Noise report will normally be required in the following circumstances:
OFFICES, ETC B1 uses (including offices, light industry)	MAYBE	- The application involves the introduction of new uses and the development is greater than small scale (e.g. a new supermarket or several shops, a new office block/ industrial estate, a new school/ library), or
NON-RESIDENTIAL INSTITUTIONS D1 uses (non-residential institutions, e.g. day centres, schools, libraries, places of worship, training centres)	MAYBE	- The application includes heating, ventilation, and air conditioning (HVAC) including combustion appliance / exhaust stacks and refrigeration / chiller machinery, plant and equipment and extractor fans at new and existing sites etc, or
OTHER Other Sui Generis uses, e.g. theatres, scrap yards, petrol filling stations, car / vehicle washing facilities, launderettes, taxi businesses scrap yards, retail warehouse clubs, nightclubs and casinos, beauty salons and Nail Bars	MAYBE	- The development would involve activities during unsociable hours (including deliveries), or - The development would involve particularly noisy processes, activities and sources (including during construction) or is proposed in proximity to noise-sensitive premises.
TRANSPORT SCHEMES e.g. new roads, rail, port and airport development, including extensions / alterations to existing schemes	YES	Early consultation with the Local Planning Authority/Environmental Health department would be expected.

WIND TURBINES	YES	Early consultation with the local planning authority/ environmental health department would be expected. Micro wind turbines may not require planning permission, however in some cases they may cause a statutory noise nuisance to neighbours. Please contact the Environmental Health Department
----------------------	-----	---

Section 3.7: Sustainable drainage and flood risk

137	<p>(Object) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>The Cambridgeshire Flood and Water SPD already provides adequate guidance on flood risk and drainage matters for development. The Flood and Water SPD will be retained and used to made decisions on planning applications. A flood risk assessment and drainage strategy are normally submitted with planning applications, and the Environment Agency, Lead Local Flood Authority and Councils Drainage Officer comment on applications as appropriate. Therefore, it is considered that adequate guidance already exists on flood and drainage matters relevant to sustainable design and construction. It is unnecessary to duplicate existing guidance.</p>
<p>Councils response:</p> <p>Concern noted. It is not the intention for this section of the SPD to replace the county wide guidance contained within the Cambridgeshire Flood and Water SPD. However, given the nature of the Flood and Water SPD, there are instances where greater detail is required for specific areas in order to ensure that sufficient information is included within planning applications to enable officers to determine the impacts of proposals on flood risk. This is the case in Cambridge, where adopted policy sets out very detailed requirements for responding to flood risk. As such it is considered appropriate that further guidance to supplement the advice in the Cambridgeshire Flood and Water SPD with detailed guidance in the Greater Cambridge Sustainable Design and Construction SPD.</p>	
34059	<p>(Object) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>The Cambridgeshire Flood and Water SPD already provides adequate guidance on flood risk and drainage matters for development. The Flood and Water SPD will be retained and used to made decisions on</p>

	<p>planning applications. A flood risk assessment and drainage strategy are normally submitted with planning applications, and the Environment Agency, Lead Local Flood Authority and Councils Drainage Officer comment on applications as appropriate. Therefore, it is considered that adequate guidance already exists on flood and drainage matters relevant to sustainable design and construction. It is unnecessary to duplicate existing guidance.</p> <p>Requested Change To delete Section 3.7, and refer to flood risk and drainage matters in a revamped Sustainability Checklist with reference to the Cambridge Flood and Water SPD.</p>
--	--

Councils response:

Concern noted. It is not the intention for this section of the SPD to replace the county wide guidance contained within the Cambridgeshire Flood and Water SPD. However, given the nature of the Flood and Water SPD, there are instances where greater detail is required for specific areas in order to ensure that sufficient information is included within planning applications to enable officers to determine the impacts of proposals on flood risk. This is the case in Cambridge, where adopted policy sets out very detailed requirements for responding to flood risk. As such it is considered appropriate that further guidance to supplement the advice in the Cambridgeshire Flood and Water SPD with detailed guidance in the Greater Cambridge Sustainable Design and Construction SPD.

34017	<p>(Object) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>The Cambridgeshire Flood and Water SPD already provides adequate guidance on flood risk and drainage matters for development. Therefore, it is considered that adequate guidance already exists on flood and drainage matters relevant to sustainable design and construction. It is unnecessary to duplicate existing guidance.</p> <p>Requested Change To delete Section 3.7, and refer to flood risk and drainage matters in a revamped Sustainability Checklist with reference to the Cambridge Flood and Water SPD.</p>
-------	---

Councils response:

Concern noted. It is not the intention for this section of the SPD to replace the county wide guidance contained within the Cambridgeshire Flood and Water SPD. However, given the nature of the Flood and Water SPD, there are instances where greater detail is required for specific areas in order to ensure that sufficient information is included within planning applications to enable officers to determine the impacts of proposals on flood risk. This is the case

in Cambridge, where adopted policy sets out very detailed requirements for responding to flood risk. As such it is considered appropriate that further guidance to supplement the advice in the Cambridgeshire Flood and Water SPD with detailed guidance in the Greater Cambridge Sustainable Design and Construction SPD.

3400
1

(Support) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019
Respondent: **Natural England (Janet Nuttall) [1009]**
Received: **23/9/2019 via Email**

We welcome requirements in the Sustainable Drainage Systems and Flood Risk sections for plans to identify multifunctional SUDS which deliver biodiversity net gain, improve water quality and reduce flood risk. We support the requirement for robust appropriate planting for ease of maintenance but not at the expense of biodiversity. Natural England supports the stipulation that a SUDS design team should including ecologist to provide advice on how to maximise biodiversity benefits.

Councils response:

Support noted.

3397
1

(Comment) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019
Respondent: **Mole Architects (Mr Meredith Bowles) [371]**
Received: **23/9/2019 via Email**

3.7.3 "All Scales of new development must utilise SuDS" - excellent use of assertive language - it should be more apparent throughout the whole document.
* Fig.11 - if unable to comply with the preferred options, it should be clearly demonstrated why all the other options are not feasible.
* 3.7.12 "Especially in the early stages of the development's design" - it should be throughout all stages of the RIBA Plan of Work.
* 3.7.12 Type error - 'way' not 'wat'

Councils response:

Comment noted. Additional text will be added to paragraph 3.7.8 to make reference to clearly demonstrating why options are not feasible. It is agreed that the SuDS team should be engaged throughout the design process, but the emphasis was placed on early stages in the SPD to ensure that the design of sustainable drainage systems informs the layout and scale of development and not be left until these issues are fixed.

Change to the SPD:

Add an additional sentence to the end of paragraph 3.7.8 to read:

If the drainage hierarchy cannot be followed, it should be clearly

demonstrated why it is not technically feasible to do so.

Amend paragraph 3.7.12 to read:

An effective SuDS team will work through these issues from early in the schemes development to find the most appropriate ~~wa~~way to deal with any conflicting design aims.

(Comment) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019

Respondent: **Historic England (Mrs Debbie Mack) [5828]**
Received: **23/9/2019 via Email**

Section 3.7: We are very supportive of the broad principle of SuDS and welcome their inclusion in schemes. We would suggest that reference is made to the need to consider archaeology in the design and layout of SuDS. Reference could be made to this in sections 4.1 and 5 and Appendix A.

3396
3 Buried waterlogged archaeology may be at particular risk from changes in the water environment. We suggest that the SPD should discuss how these sorts of sites will be managed, which makes reference to the Historic England 'Preserving Archaeological Remains' guidance (2016). Whilst sustainable drainage systems could be designed to drain cleaned water into lakes and help re-charge water levels, schemes should not undermine the historic design of the lake, its character and setting, nor undermine the viability of the dam. The SuDS outlet design needs to take account of vulnerability of the lake margins to scouring and erosion, and on-going maintenance. Reference could be made to the CIRIA SuDS Manual which offers more guidance.

Councils response:

The aim of this section of the SPD is to provide additional supplementary guidance for sustainable drainage schemes in Cambridge, in addition to the guidance contained in the Cambridgeshire Flood and Water SPD. The Cambridgeshire Flood and Water SPD includes guidance on the consideration of buried waterlogged archaeology and includes consideration of the historic and archaeological environment in the Cambridgeshire SuDS Design Principles. To provide clarification, reference to consideration of both the design principles set out in the Greater Cambridge Sustainable Design and Construction SPD and the principles set out in the Cambridgeshire Flood and Water SPD will be added to paragraph 3.7.11 of the draft SPD. A link to the Historic England guidance will also be added to paragraph 3.7.13. Note that this paragraph already contains a link to the CIRIA SuDS Manual.

Changes to the SPD:

Amend paragraph 3.7.11 to read:

Use of these principles will form part of the Council's assessment of the

proposed surface Water Drainage Strategy, alongside the design principles set out in Table 6.1 of the Cambridgeshire Flood and Water SPD.

Add an additional bullet point to paragraph 3.7.13 to read:

- Historic England 'Preserving Archaeological Remains' guidance (2016). Available online at: <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>

3395 5	<p>(Comment) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Environment Agency (Mr Chris Swain) [4745] Received: 23/9/2019 via Email</p> <p>This section is one of the more limited sections within the SPD, probably because the Cambridgeshire Flood and Water SPD provides a lot of detail required to properly assess flood risk and SuDS.</p> <p>The Flood and Water SPD is a county level document and it would be beneficial to add more detailed guidance on location specific issues such as Awarded Watercourses. There are also local examples of good practice that could be highlighted within the document i.e. Northstowe water parks.</p> <p>Flood risk and surface water drainage is often best managed through integration into the urban form. This is mentioned but it could be expanded to highlight other supporting policies such as green infrastructure (often function better when they are constructed blue/green corridors), climate change, ecology, etc.</p>
-----------	---

Councils response:

The aim of this section of the SPD is to provide additional high level supplementary guidance for sustainable drainage schemes in Cambridge, in addition to the more detailed guidance contained in the Cambridgeshire Flood and Water SPD, specifically responding to issues that have arisen as a result of planning applications. While guidance related to awarded watercourses might be useful, given the level of detail that would be required, it is considered that this would be best dealt with by way of separate guidance.

With regards to further detail in relation to integration of SuDS with urban form, this is referenced in paragraph 3.7.12, with further guidance contained in the Cambridgeshire Flood and Water SPD alongside other guidance such as the SuDS Manual. As such, it is not considered necessary to include further guidance in the Greater Cambridge Sustainable Design and Construction SPD.

3395 2	<p>(Comment) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Environment Agency (Mr Chris Swain) [4745] Received: 23/9/2019 via Email</p>
-----------	---

	<p>We can see no requirement for new developments to have an effectual foul drainage system? This is an integral requirement for sustainable design and construction, particularly where non-mains drainage is proposed. This topic could easily fit into the 'Pollution', 'Sustainable Drainage Systems and Flood Risk' or 'Health and Wellbeing' Sections of the SPD (sections 3.6, 3.7 and 4.2 respectively).</p> <p>The Sustainability Checklist could include a requirement to submit an Anglian Water 'Pre-Application Enquiry Report' with any proposal to connect into the existing foul sewer. This would provide evidence that sufficient foul drainage capacity exists to accommodate the proposed development, or will indicate the extent of improvement/upgrade required in order to create capacity.</p>
<p>Councils response:</p> <p>Foul water drainage requirements are covered by the Cambridgeshire Flood and Water SPD and as such further detail is not considered necessary in the Greater Cambridge Sustainable Design and Construction SPD. The Sustainability checklist includes reference to completion of the checklists included in the Cambridgeshire Flood and Water SPD.</p>	
<p>3395 1</p>	<p>(Comment) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Environment Agency (Mr Chris Swain) [4745] Received: 23/9/2019 via Email</p> <p>With respect to Sustainable Drainage and Flood Risk, it would be beneficial for drainage strategies and new surface water drainage systems to consider and implement multiple benefits of SuDS such as to 'enhance biodiversity or improve water quality' as noted on page 179 of the SPD.</p>
<p>Councils response:</p> <p>The role of sustainable drainage systems in delivering biodiversity enhancements and improve water quality is referenced in paragraph 3.7.10 of the SPD, with further detail provided in the Cambridgeshire Flood and Water SPD.</p>	
<p>3393 8</p>	<p>(Comment) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cambridge Past, Present & Future (Mr James Littlewood) [8127] Received: 23/9/2019 via Email</p> <p>We support the inclusion of biodiversity benefit in this section but would like to see greater emphasis placed on this. There seems to be a growing preference by developers for the use of shallow swales in new developments, which only hold water for short-periods during heavy rainfall events and are dry outside these periods. As a result they are unable to support aquatic or semi-aquatic species, significantly reducing</p>

	<p>their biodiversity value - compared to the creation of a pond within a deeper swale. In the past, some developers have proposed biodiversity benefits from their SUDs which were not then realised due to insufficient water.</p>
	<p>Councils response: Comment noted. The primary function of SuDS is to provide effective drainage, but where SuDS features such as swales are proposed to have biodiversity benefits, the Councils do seek detailed technical drawings so that these can be checked by specialist internal officers, such as sustainable drainage engineers, landscape architects and ecologists as well as by colleagues at Cambridgeshire County Council in their role as lead local authority.</p>
<p>3393 4</p>	<p>(Comment) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Anglian Water Services Ltd (Mr Stewart Patience) [5918] Received: 23/9/2019 via Email</p> <p>We would suggest that the option to re-use water on site part of development sites in Great Cambridge area should be included in Section 3.7.</p> <p>Para 3.7.8 - Anglian Water has been adopting SuDs features which meet our adoption criteria since 2012. Amend as follows:</p> <p>'Maintenance and management plan of surface water drainage system (for the lifetime of the development) including details of future adoption by sewerage undertaker or other body;'</p> <p>Para 3.7.12 - It is important to note that for some SuDs features have significant water quality benefits. The text should be amended to make this clear.</p> <p>Para 3.7.13 - Further guidance should also include reference to Anglian Water's Surface Water Policy, SuDs Adoption Handbook and Sewers for Adoption Version 8.</p>
	<p>Councils response: Comment noted. The SPD will be amended as requested.</p> <p>Change to the SPD: Paragraph 3.7.8, sixth bullet point. Amend to read:</p> <ul style="list-style-type: none"> • 'Maintenance and management plan of surface water drainage system (for the lifetime of the development) including details of future adoption <u>by sewerage undertaker or other body;</u>

<p>Amend the second bullet point of paragraph 3.7.12 to read: Drainage engineers with the expertise to ensure that the proposed design will provide effective drainage <u>and enhance water quality</u>;</p> <p>Add an additional bullet point to paragraph 3.7.13 to read:</p> <ul style="list-style-type: none"> • <u>Anglian Water's Surface Water Policy, SuDs Adoption Handbook and Sewers for Adoption Version 8 (or successor document). Available online at:</u> https://www.anglianwater.co.uk/siteassets/developers/aw_suds_manual_aw_fp_web.pdf 	
33901	<p>(Object) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Given fen-edge's vulnerability, much more attention should be paid to the prevention and mitigation of flooding.</p>
<p>Councils response:</p> <p>Concern noted. Detailed guidance on prevention and mitigation of flood risk is contained in the Cambridgeshire Flood and Water SPD. It is not the intention for this section of the SPD to replace this county wide guidance.</p>	
33900	<p>(Object) Section 3: Policy Implementation, 3.7 Sustainable drainage systems and flood risk - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Mostly Cambridge - s3.7.5 is pretty good. But NOTHING for SCDC yet its flood strategy was virtually copied by CCC.</p> <p>Should at least cover the pre-dev in-dev and post-development conditions proposed by CPC and Cottenham Flood Risk Forum, a multi-agency group including AW, CCC, CPC, ES, IDB and SCDC.</p>
<p>Councils response:</p> <p>Guidance on drainage for proposals in South Cambridgeshire is contained within the Cambridgeshire Flood and Water SPD. Section 3.7 relates to Cambridge applications only due to the detailed nature of the Cambridge drainage policy and in light of issues that have arisen in the implementation of this policy in applications to date. It is the intention that this section therefore acts as a supplement to the more detailed guidance contained in the Cambridgeshire Flood and Water SPD.</p>	

Section 3.8: Construction standards (BREEAM)

38	(Object) Section 3: Policy Implementation, 3.8 Construction
----	--

	<p>standards (BREEAM) - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>Section 3.8 deals with construction standards, and only applies to non-residential development in Cambridge. Policy 28 of the Cambridge Local Plan expects non-residential development to achieve BREEAM 'excellent' standards, unless it can be demonstrated that meeting this standard would be unviable. Therefore, a BREEAM assessment will be required for non-residential developments, and as such no further guidance is necessary. A revamped Sustainability Checklist could refer to the relevant guidance.</p>
<p>Councils response:</p> <p>The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. The level of guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications. This includes the submission of applications without BREEAM pre-assessments and without completed Sustainability Checklists. As such, it is considered that the guidance related to BREEAM is necessary.</p>	
34119	<p>(Object) Section 3: Policy Implementation, 3.8 Construction standards (BREEAM) - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>The SPD indicates an expectation that non-residential development in Cambridge City achieves a BREEAM 'Excellent' rating. Whilst U&C accepts that the aspiration for BREEAM 'Excellent' is achievable for certain non-residential development in specific locations and circumstances, a requirement for all non-residential development to achieve BREEAM 'Excellent' poses a significant challenge for the delivery of the majority of non-residential development.</p> <p>U&C is concerned that the SPD doesn't provide further, more specific and pragmatic guidance in relation to the circumstances that BREEAM 'Excellent' can be achieved. For example, the SPD could establish thresholds and non-residential project criteria defining where BREEAM 'Excellent' is realistically achievable for example - 'major development' within defined planning use classes.</p>
<p>Councils response:</p> <p>Comment noted. The requirements of policy 28 of the Cambridge Local Plan</p>	

have been subject to viability testing and have been found to be viable and indeed has already been delivered across many schemes in Cambridge. However, it is noted that for some schemes it is not always technically feasible to meet the requirements of the policy in full, hence the wording in paragraph 3.8.6. Policy 28 does allow for feasibility and viability to be taken into account, with further guidance in relation to this in paragraphs 3.1.3 and 3.1.4 of the SPD. Where full compliance with the requirements of policy 28 is not possible, this will be considered on a case by case basis and should be raised as part of the pre-application process. As such, it is not considered necessary to amend the SPD or the policy requirements for Cambridge further.

34060	<p>(Object) Section 3: Policy Implementation, 3.8 Construction standards (BREEAM) - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>Section 3.8 deals with construction standards, and only applies to non-residential development in Cambridge. Policy 28 of the Cambridge Local Plan expects non-residential development to achieve BREEAM 'excellent' standards, unless it can be demonstrated that meeting this standard would be unviable. Therefore, a BREEAM assessment will be required for non-residential developments, and as such no further guidance is necessary. A revamped Sustainability Checklist could refer to the relevant guidance.</p> <p>Requested Change To delete Section 3.8, and refer to construction standards in a revamped Sustainability Checklist.</p>
-------	--

Councils response:

The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. The level of guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications. This includes the submission of applications without BREEAM pre-assessments and without completed Sustainability Checklists. As such, it is considered that the guidance related to BREEAM is necessary.

34044	<p>(Object) Section 3: Policy Implementation, 3.8 Construction standards (BREEAM) - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email</p>
-------	--

	<p>While Paragraph 3.8.6 notes there may be instances where achieving this requirement is not feasible or viable it is considered that for developments of below 1,000m² achieving a BREEAM rating may not be the most effective route for delivering sustainable development. Similar local authority Plans across England recognise that for development below 1,000m² the BREEAM methodology is too prescriptive and can lead to credit chasing, utilising methods or technologies which do not necessarily deliver sustainable development. Countryside believe that the guidance should be amended, with paragraphs 3.8.4 and 3.8.6 updated as below to include a specific threshold to development below <1,000m² to allow development of this scale to pursue a bespoke strategy more suited to the development scale and type.</p> <p>Paragraph 3.8.4 - Proposals for new development >1,000m² should be assessed using the latest version of the BREEAM New Construction scheme available at the time of development.</p> <p>Paragraph 3.8.6 - Where development is <1,000m², or, full achievement of policy requirements is not possible due to technical feasibility or viability considerations, early engagement with the Council's Sustainability Consultant is strongly recommended in order that alternative approaches to delivering the aims of the policy can be agreed ahead of submission of a planning application.</p>
	<p>Councils response:</p> <p>Comment noted. The requirements of policy 28 of the Cambridge Local Plan have been subject to viability testing and have been found to be viable and indeed has already been delivered across many schemes in Cambridge, including on some schemes below the threshold of a major development. However, it is noted that for some schemes it is not always technically feasible to meet the requirements of the policy in full, hence the wording in paragraph 3.8.6. Policy 28 does allow for feasibility and viability to be taken into account, with further guidance in relation to this in paragraphs 3.1.3 and 3.1.4 of the SPD. Where full compliance with the requirements of policy 28 is not possible, this will be considered on a case by case basis and should be raised as part of the pre-application process. As such, it is not considered necessary to amend the SPD or the policy requirements for Cambridge further.</p>
34031	<p>(Comment) Section 3: Policy Implementation, 3.8 Construction standards (BREEAM) - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: No. 6 Developments (Mr Richard Oakley) [8140] Respondent: Cambridge University Hospital NHS Foundation Trust (Carin Charlton) [8141] Received: 23/9/2019 via Email</p> <p>A key point for us is that when creating new buildings and infrastructure, which sit standalone from the other hospital and wider campus, projects are more readily able to achieve higher sustainability standards. It is more difficult to achieve these standards when</p>

	<p>implementing more short term solutions, through extensions and modifications to the existing hospital buildings. CUH is committed to achieving sustainability objectives, however is also required to meet certain NHS clinical design and build standards (HTM and HBN) and building regulations, which in some instances may take precedence against the BREEAM assessment criteria.</p> <p>The SPD does not provide any information for where dispensations or departures from the target of BREEAM 'Excellent' would be permitted, other than acknowledging the need to consider technical feasibility (para 3.1.4 of the document). It is positive to see that Paragraph 3.8.6 of the SPD notes that where compliance is not possible due to technical feasibility or viability considerations, early engagement should be undertaken with the Council to agree an alternative approach. We are seeking recognition of unique circumstances, or alternatively a working understanding with officers of the circumstances of the hospital and wider campus and how these may impact on what can be achieved.</p>
--	---

<p>Councils response:</p> <p>The requirements set out in the Cambridge Local Plan replicate construction standards that have already been delivered as part of the ongoing development of the Addenbrookes site and the wider development of the Cambridge Biomedical Campus. For example, the Papworth Hospital site has achieved BREEAM excellent. The SPD already sets out consideration will be given to the feasibility and viability of implementing policy requirements on a case by case basis as set out in paragraphs 3.1.3 and 3.1.4. As such, it is not considered necessary for the SPD to provide any further guidance beyond that already provided.</p>	
---	--

34018	<p>(Object) Section 3: Policy Implementation, 3.8 Construction standards (BREEAM) - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>Section 3.8 deals with construction standards, and only applies to non-residential development in Cambridge. Policy 28 of the Cambridge Local Plan expects non-residential development to achieve BREEAM 'excellent' standards, unless it can be demonstrated that meeting this standard would be unviable. Therefore, a BREEAM assessment will be required for non-residential developments, and as such no further guidance is necessary. A revamped Sustainability Checklist could refer to the relevant guidance.</p> <p>Requested Change To delete Section 3.8, and refer to construction standards in a revamped Sustainability Checklist.</p>
-------	--

<p>Councils response:</p> <p>The purpose of the SPD is to provide guidance on the level of information that</p>	
--	--

is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. The level of guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications. This includes the submission of applications without BREEAM pre-assessments and without completed Sustainability Checklists. As such, it is considered that the guidance related to BREEAM is necessary.

33972	<p>(Comment) Section 3: Policy Implementation, 3.8 Construction standards (BREEAM) - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email</p> <p>3.8.3 If no BREEAM assessments for existing buildings are required, independent environmental assessments should be carried out.</p>
-------	---

Councils response:
Comment noted. Policy 28 of the Local Plan does encourage the use of bespoke assessment methodologies to assess the redevelopment of existing buildings and the Council is aware of other methodologies such as EnerPhit. However, the SPD cannot be used to set new policy requirements related to the environmental assessment of existing buildings. This will be looked at as part of the development of the Greater Cambridge Local Plan as the retrofit of existing buildings will have a significant role to play in meeting net zero carbon requirements.

33899	<p>(Object) Section 3: Policy Implementation, 3.8 Construction standards (BREEAM) - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Only non-residential in CCC? Fashionable, like PassivHaus, but said to add 10% or more to construction cost. Necessary?</p>
-------	---

Councils response:
Comment noted. The requirements of policy 28 of the Cambridge Local Plan have been subject to viability testing and have been found to be viable and indeed has already been delivered across many schemes in Cambridge.

Section 3.9: Sustainable show homes

39	<p>(Object) Section 3: Policy Implementation, 3.9 Sustainable Show Homes - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p>
----	---

	<p>Section 3.9 relates to sustainable show homes as required by Policy CC/5 of the South Cambridgeshire Local Plan. It is considered that Policy CC/5 and associated supporting text provides sufficient guidance for developments where a sustainable show home would be provided; Section 3.9 effectively repeats the policy requirements and is unnecessary.</p>
<p>Councils response:</p> <p>The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. While it is recognised that this section of the SPD does replicate some aspects of the wording from policy CC/5, it does provide additional guidance on the implementation of policy.</p> <p>The level of guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications. As such, it is considered that the guidance related to Sustainable Show Homes is necessary.</p>	
34061	<p>(Object) Section 3: Policy Implementation, 3.9 Sustainable Show Homes - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>Section 3.9 relates to sustainable show homes as required by Policy CC/5 of the South Cambridgeshire Local Plan. It is considered that Policy CC/5 and associated supporting text provides sufficient guidance for developments where a sustainable show home would be provided; Section 3.9 effectively repeats the policy requirements and is unnecessary.</p> <p>Requested Change To delete Section 3.9 because it is unneccetary and provides no additional guidance to support the implementation of Policy CC/5.</p>
<p>Councils response:</p> <p>The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. While it is recognised that this section of the SPD does replicate some aspects of the wording from policy CC/5, it does provide additional guidance on the implementation of policy.</p> <p>The level of guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge</p>	

<p>Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications. As such, it is considered that the guidance related to Sustainable Show Homes is necessary.</p>	
	<p>(Object) Section 3: Policy Implementation, 3.9 Sustainable Show Homes - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>SECTION 3.9 SHOW HOMES COMMENTS</p>
34019	<p>Section 3.9 relates to sustainable show homes as required by Policy CC/5 of the South Cambridgeshire Local Plan. It is considered that Policy CC/5 and associated supporting text provides sufficient guidance for developments where a sustainable show home would be provided; Section 3.9 effectively repeats the policy requirements and is unnecessary.</p> <p>Requested Change To delete Section 3.9 because it is unnecessary and provides no additional guidance to support the implementation of Policy CC/5.</p>
<p>Councils response:</p> <p>The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. While it is recognised that this section of the SPD does replicate some aspects of the wording from policy CC/5, it does provide additional guidance on the implementation of policy.</p> <p>The level of guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications. As such, it is considered that the guidance related to Sustainable Show Homes is necessary.</p>	
33897	<p>(Comment) Section 3: Policy Implementation, 3.9 Sustainable Show Homes - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Developers to nudge buyers towards optional environmentally-friendly extras.</p> <p>Necessary?</p>

Councils response:

Comment noted. The Council introduced the policy as it recognised the benefits of achieving higher standards of sustainability even though the South Cambridgeshire Local Plan did not specify higher environmentally sustainable standards in its policies than those required through Building Regulations, except in the policies on water efficiency and the generation of onsite renewable energy. A sustainable show home demonstrating environmentally sustainable alternatives was considered justified to encourage home buyers to upgrade the sustainability of their new home from the standard specification by choosing more environmentally sustainable finishes, materials, fixtures and technologies.

Section 3.10: Works to a heritage asset to address climate change

40	<p>(Object) Section 3: Policy Implementation, 3.10 Works to a heritage asset to address climate change - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>Section 3.10 refers to general guidance on the protection of heritage assets from Historic England, English Heritage and the Chartered Institution of Building Services Engineers. However, that guidance relates to the protection of heritage assets and not specific advice relevant to sustainable design and construction matters. The most important factor for development affecting heritage assets is the conservation of that asset. There may be opportunities to improve the energy efficiency and enhance the sustainability of heritage assets as part development proposals, but the ability to implement those opportunities will be subject to the significance and harm to that heritage asset. As identified in Section 3.10, Historic England, English Heritage and the Chartered Institution of Building Services Engineers provide advice on environmental improvements in heritage assets, and as such it is considered that no additional guidance is required or necessary.</p>
----	---

Councils response:

The external guidance referred to in the SPD is specifically related to works to heritage assets to address the energy efficiency and wider environmental performance of heritage assets. The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. This guidance is considered of particular importance for works to heritage assets to address climate change. The level of guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications. This includes the submission of applications without completed

Sustainability Checklists. As such, it is considered that the guidance related to heritage assets is necessary.

34100	<p>(Object) Section 3: Policy Implementation, 3.10 Works to a heritage asset to address climate change - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>3.10.1. Needs to stress importance of putting buildings into good repair - cross reference to Building Regulations Part L and British Standard BS 7913:2013</p> <p>3.10.2. Cross reference Part L principles</p> <p>3.10.4. embodied energy - whole life cycle. Cross-reference BS EN 15978</p> <p>3.10.5 Cross reference PAS 2035 and BS 7913, STBA guidance and guidance wheel.</p>
-------	---

Councils response:

With regards to paragraph 3.10.1, additional wording will be added to the final sentence of this paragraph to reflect the need to ensure that buildings are in a good state of repair. Reference to Part L will also be included within paragraph 3.10.2. With regards to embodied energy, the SPD already recognises the significant carbon savings that the adaptive re-use of heritage assets can deliver in terms of embodied energy. However, to require applicants to undertake a lifecycle assessment is considered to go beyond the current requirements set out in the relevant local plan policies. SPDs cannot be used to set new policy requirements. Reference to PAS 2035, BS 7913 and guidance from the STBA will be added to paragraph 3.10.5.

Changes to the SPD:

Amend the final sentence of paragraph 3.10.1 to read:

The Councils aim, therefore, is to ensure that a heritage asset is maintained in a good state of repair and that its significance and its continued potential for adaptability is maintained by ensuring that alterations to address climate change or reduction of carbon emissions are sensitive.

Add additional sentences after the first sentence of paragraph 3.10.2 to read:

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.

Amend the first sentence of paragraph 3.10.7 to read:

Further guidance is also available from CIBSE:
 And add the following guidance documents to the list:

- BSI (2019). PAS 2035/2030: 2019. Retrofitting dwellings for improved energy efficiency. Specification and guidance. Specification for the installation of energy efficiency measures in existing dwellings and insulation in residential park homes. Available online at: https://shop.bsigroup.com/ProductDetail/?pid=000000000030390699&_ga=2.47214575.996413101.1561645187-1834974640.1559206354
- Sustainable Traditional Buildings Alliance (2015). Planning responsible retrofit of traditional buildings. Available online at: <http://www.sdfoundation.org.uk/downloads/Guide-1-Planning-Responsible-Retrofit-2015-08.pdf>
- Sustainable Traditional Buildings Alliance Responsible Retrofit Guidance Wheel. Available online at: <http://www.responsible-retrofit.org/wheel/>
- British Standards Institute (2013). BS 7913:2013. Guide to the conservation of historic buildings. Available online at: <https://shop.bsigroup.com/ProductDetail/?pid=000000000030248522>

(Object) Section 3: Policy Implementation, 3.10 Works to a heritage asset to address climate change - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019
 Agent: Carter Jonas (Mr Brian Flynn) [2200]
 Respondent: **Endurance Estates (Mr Jake Nugent) [7353]**
 Received: **23/9/2019 via Email**

3406
2

Section 3.10 refers to general guidance on the protection of heritage assets from Historic England, English Heritage and the Chartered Institution of Building Services Engineers. However, that guidance relates to the protection of heritage assets and not specific advice relevant to sustainable design and construction matters. The most important factor for development affecting heritage assets is the conservation of that asset. There may be opportunities to improve the energy efficiency and enhance the sustainability of heritage assets as part development proposals, but the ability to implement those opportunities will be subject to the significance and harm to that heritage asset. As identified in Section 3.10, Historic England, English Heritage and the Chartered Institution of Building Services Engineers provide advice on environmental improvements in heritage assets, and as such it is considered that no additional guidance is required or necessary.

Requested Change
 To refer to environmental improvements to heritage assets in a revamped Sustainability Checklist.

Councils response:
 The external guidance referred to in the SPD is specifically related to works to heritage assets to address the energy efficiency and wider environmental

	<p>performance of heritage assets. The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. This guidance is considered of particular importance for works to heritage assets to address climate change. The level of guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications. This includes the submission of applications without completed Sustainability Checklists. As such, it is considered that the guidance related to heritage assets is necessary.</p>
34020	<p>(Object) Section 3: Policy Implementation, 3.10 Works to a heritage asset to address climate change - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>The most important factor for development affecting heritage assets is the conservation of that asset. There may be opportunities to improve the energy efficiency and enhance the sustainability of heritage assets as part development proposals, but the ability to implement those opportunities will be subject to the significance and harm to that heritage asset. As identified in Section 3.10, Historic England, English Heritage and the Chartered Institution of Building Services Engineers provide advice on environmental improvements in heritage assets, and as such it is considered that no additional guidance is required or necessary.</p>
	<p>Councils response:</p> <p>The purpose of the SPD is to provide guidance on the level of information that is required to be submitted with planning applications to ensure that applications clearly demonstrate how they comply with adopted planning policy. This guidance is considered of particular importance for works to heritage assets to address climate change. The level of guidance contained within the SPD is considered necessary due to the varying quality of applications submitted to the Greater Cambridge Shared Planning Service, with some applications containing insufficient information leading to subsequent delays in determining planning applications. This includes the submission of applications without completed Sustainability Checklists. As such, it is considered that the guidance related to heritage assets is necessary.</p>
33973	<p>(Comment) Section 3: Policy Implementation, 3.10 Works to a heritage asset to address climate change - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email</p>

	3.10.1 Heritage - should be sensitive but also with purpose.
<p>Councils response:</p> <p>Comment noted. The guidance contained within the SPD and related local plans policy seeks to ensure the continued use of heritage assets taking a balanced approach to benefits that works to heritage asset to address climate change can deliver against the need to limit and mitigate harm to that asset.</p>	
33964	<p>(Comment) Section 3: Policy Implementation, 3.10 Works to a heritage asset to address climate change - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Historic England (Mrs Debbie Mack) [5828] Received: 23/9/2019 via Email</p> <p>We broadly welcome this section of the SPD. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment.</p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.</p> <p>In developing policy covering this area you may find the Historic England guidance Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historically and traditionally constructed buildings</p>
<p>Councils response:</p> <p>Comment noted. Reference to the exemptions contained within Part L of the Building Regulations will be added to the SPD, as will reference to the guidance from Historic England.</p> <p>Change to the SPD:</p> <p>Add additional sentences after the first sentence of paragraph 3.10.2 to read: <u>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.</u></p>	

Add the following guidance document to the bullet point list at paragraph 3.10 .7:

- Historic England (2017). Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historically and traditionally constructed buildings. Available online at: <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/>

3389 6	<p>(Object) Section 3: Policy Implementation, 3.10 Works to a heritage asset to address climate change - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Nothing much to help a home-owner wishing to improve environmental friendliness of a heritage asset (seems to ignore CAs?) SCDC villages have many heritage assets that will become uneconomic and uninhabitable unless adapted to emission reduction and flood resilience yet there are many planning restrictions on works to achieve those.</p>
-----------	---

Councils response:

Reference to guidance for homeowners seeking to carry out works to heritage assets is included in section 3.2 of the SPD. The guidance contained within the SPD and related local plans policy seeks to ensure the continued use of heritage assets taking a balanced approach to benefits that works to heritage asset to address climate change can deliver against the need to limit and mitigate harm to that asset.

Section 3.11: Construction waste and recycling and waste facilities

41	<p>(Object) Section 3: Policy Implementation, 3.11 Construction waste and recycling and waste facilities - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>The adopted RECAP Waste Management Design Guide and Toolkit already provides adequate guidance on dealing with waste in development. The RECAP Guide and Toolkit will be retained and used to make decisions on planning applications. Therefore, it is considered that adequate guidance already exists on waste matters relevant to sustainable design and construction. It is unnecessary to duplicate existing guidance.</p>
----	---

Councils response:

The RECAP Design Guide only deals with post construction waste management and does not give any consideration to construction waste

	<p>management, which is a significant source of waste sent to landfill. As such, it is considered appropriate and necessary for the SPD to include guidance on construction waste as well as pointing developers to the RECAP Design Guide and Toolkit in order to ensure adequate information is included within planning submissions.</p>
34120	<p>(Support) Section 3: Policy Implementation, 3.11 Construction waste and recycling and waste facilities - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: David Lock Associates (Mr Harry Jones) [8143] Respondent: Urban&Civic Ltd [5688] Received: 23/9/2019 via Email</p> <p>U&C supports the approach set out within the SPD to the minimisation of construction waste and to the reduction of waste generated by the operation of development projects. U&C has a strong record of successfully limiting the extent of construction waste from its large-scale developments including at Alconbury Weald. U&C is committed to extending this approach at Waterbeach Barracks through the delivery of this development.</p>
<p>Councils response: Support noted.</p>	
34101	<p>(Object) Section 3: Policy Implementation, 3.11 Construction waste and recycling and waste facilities - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>3.11.3. Embodied carbon? Promote recycling and re-use of materials. Lime mortar</p>
<p>Councils response: The Waste section of the BREEAM methodology referred to in paragraph 3.11.3 includes credits related to designing for disassembly and adaptability, which includes consideration of the reclamation and reuse of resources. Paragraph 3.11.4 goes on to promote the use of the WRAP principles for reducing construction waste, which includes designing for reuse and recovery and designing for deconstruction and flexibility. It is considered that the issue of embodied carbon is inherent in these principles.</p>	
34063	<p>(Object) Section 3: Policy Implementation, 3.11 Construction waste and recycling and waste facilities - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>The adopted RECAP Waste Management Design Guide and Toolkit already provides adequate guidance on dealing with waste in development. The RECAP Guide and Toolkit will be retained and used</p>

	<p>to make decisions on planning applications. Therefore, it is considered that adequate guidance already exists on waste matters relevant to sustainable design and construction. It is unnecessary to duplicate existing guidance.</p> <p>Requested Change To delete Section 3.10, and refer to waste matters in a revamped Sustainability Checklist with reference to the RECAP Waste Management Design Guide and Toolkit.</p>
<p>Councils response:</p> <p>The RECAP Design Guide only deals with post construction waste management and does not give any consideration to construction waste management, which is a significant source of waste sent to landfill. As such, it is considered appropriate and necessary for the SPD to include guidance on construction waste as well as pointing developers to the RECAP Design Guide and Toolkit in order to ensure adequate information is included within planning submissions.</p>	
34032	<p>(Comment) Section 3: Policy Implementation, 3.11 Construction waste and recycling and waste facilities - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: No. 6 Developments (Mr Richard Oakley) [8140] Respondent: Cambridge University Hospital NHS Foundation Trust (Carin Charlton) [8141] Received: 23/9/2019 via Email</p> <p>CUH is committed to reducing waste and maximising recycling and has previously been recognised for its first-class work in waste management³. CUH's waste management needs are significantly different from that of a 'typical' non-residential use, specifically due to its clinical waste. It is considered that the SPD in its current draft does not include advice for non-typical uses, and flexibility should therefore be included within the SPD for non-typical uses such as hospitals and clinical sites.</p>
<p>Councils response:</p> <p>Comment noted. While it is noted that in terms of waste management, hospitals and clinical sites are not typical uses, it is not the role of the Greater Cambridge Sustainable Design and Construction SPD to develop new guidance related to waste management. This is for Cambridgeshire County Council in their role as the Minerals and Waste Planning Authority. As such, the SPD merely points applicants towards the guidance already developed in the RECAP Waste Management Design Guide and Toolkit, which supports the Minerals and Waste Core Strategy. Any further guidance related to non typical uses would need to be developed by Cambridgeshire County Council.</p>	
34021	<p>(Object) Section 3: Policy Implementation, 3.11 Construction waste and recycling and waste facilities - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200]</p>

	<p>Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>The adopted RECAP Waste Management Design Guide and Toolkit already provides adequate guidance on dealing with waste in development. The RECAP Guide and Toolkit will be retained and used to make decisions on planning applications. Therefore, it is considered that adequate guidance already exists on waste matters relevant to sustainable design and construction. It is unnecessary to duplicate existing guidance.</p> <p>Requested Change To delete Section 3.10, and refer to waste matters in a revamped Sustainability Checklist with reference to the RECAP Waste Management Design Guide and Toolkit.</p>
<p>Councils response:</p> <p>The RECAP Design Guide only deals with post construction waste management and does not give any consideration to construction waste management, which is a significant source of waste sent to landfill. As such, it is considered appropriate and necessary for the SPD to include guidance on construction waste as well as pointing developers to the RECAP Design Guide and Toolkit in order to ensure adequate information is included within planning submissions.</p>	
33974	<p>(Comment) Section 3: Policy Implementation, 3.11 Construction waste and recycling and waste facilities - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email</p> <p>3.11.1 "All new development MUST be designed to reduce construction waste"</p>
<p>Councils response:</p> <p>Comment noted. Paragraph 3.11.1 will be amended accordingly.</p> <p>Change to the SPD:</p> <p>Amend the second sentence of paragraph 3.11.1 to read: All new development should <u>must</u> be designed to reduce construction waste and to make it easier for future occupants to maximise levels of recycling and reduce waste being sent to landfill.</p>	
33954	<p>(Comment) Section 3: Policy Implementation, 3.11 Construction waste and recycling and waste facilities - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Environment Agency (Mr Chris Swain) [4745] Received: 23/9/2019 via Email</p> <p>We would refer applicant to the Construction Code of Practice for the Sustainable use of Soils on Construction Sites for reference only.</p>

	<p>Developers should apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options.</p> <p>Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice.</p>
	<p>Councils response:</p> <p>Comment noted. Reference to the Construction Code of Practice for the Sustainable use of Soils will be added to paragraph 3.11.6, although it is noted that this guidance has not been updated since 2009 so may not include up to date references to legislation.</p> <p>Change to the SPD:</p> <p>Add the following bullet point to paragraph 3.11.6:</p> <ul style="list-style-type: none"> • <u>DEFRA (2009). Code of Practice for the Sustainable Use of Soils on Construction Sites. Available online at: https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites</u>
33895	<p>(Object) Section 3: Policy Implementation, 3.11 Construction waste and recycling and waste facilities - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Very thin - when 1/3 of all waste is alleged to come from construction and demolition and a substantial portion of that is then fly-tipped.</p> <p>Beyond scope here, but there has to be a better solution to charging / disposing of waste.</p> <p>Maybe all construction waste should be disposed of within 400 metres of its source - banning movement of waste and the resultant land-fill and fly-tipping.</p>
	<p>Councils response:</p> <p>Comment noted. Cambridgeshire County Council in their role as the Minerals and Waste Planning Authority are responsible for the development of policy and guidance related to waste management. As such, the SPD merely points applicants towards the guidance already developed in the RECAP Waste Management Design Guide and Toolkit, which supports the Minerals and Waste Core Strategy.</p>

Section 4: Further approaches to sustainable design and construction

142	<p>(Object) Section 4: Further approaches to sustainable design and construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>Section 4 highlights some further approaches to the delivery of sustainable design and construction. In most cases the topics are not related to planning policies, and are identified as a series of aspirations rather than matters that can be addressed through the planning system. As identified in Paragraph 4.1.1 of the draft SPD, some of these topics/aspirations are contained in the Cambridgeshire Quality Charter for Growth. It is considered that the draft SPD, which will be used to make decisions on planning applications, is not the appropriate document to set out aspirations.</p>
-----	---

Councils response

Section 4 of the SPD specifically relates to a number of policies in the South Cambridgeshire Local Plan, including policies for new settlements, which include requirements for those developments to demonstrate how they are exemplars of sustainability. The topics included within section 4 have therefore been developed following pre-application discussions with the promoters of these sites and respond to the approaches that are being taken to demonstrate this exemplar requirement. The requirements of this section also relate to the implementation of policy 28 of the Cambridge Local Plan. Paragraph 4.5 of the supporting text to this policy notes that in addition to the specific topics referenced in the policy wording, Sustainability Statements should also address other policies relating to sustainability throughout the Cambridge Local Plan, including health and well-being and the provision of open space, culture, heritage and the quality of built form including efficient use of land. As such, it is considered that the guidance in Section 4, which are also considered to be fundamental aspects of planning’s role in placemaking and enabling people to live low carbon lifestyles, is justified. Additional wording will be added to the start of this section however to clarify the policy basis for this section of the SPD.

Change to the SPD.

Add the following table after paragraph 4.1.2:

<u>LOCATION:</u>	<u>Cambridge and South Cambridgeshire</u>
<u>POLICY:</u>	<u>Cambridge:</u> <ul style="list-style-type: none"> • <u>Policy 28: Carbon reduction, community energy networks, sustainable design, and construction and water use.</u> <u>South Cambridgeshire:</u> <ul style="list-style-type: none"> • <u>Policy SS/6: Waterbeach New</u>

	<ul style="list-style-type: none"> • <u>Town (criterion 12)</u> • <u>Policy SS/7: New Village at Bourn Airfield (criterion 9)</u> • <u>Policy SS/8: Cambourne West (Criterion 13)</u> • <u>Policy HQ/1: Design Principles (criteria k, l and m)</u> • <u>Policy SC/2: Health Impact Assessment</u>
<u>SCALE OF DEVELOPMENT</u>	All development (except householder)
<u>TYPE OF DEVELOPMENT</u>	Residential and non-residential
<u>SUBMISSION REQUIREMENTS</u>	<ul style="list-style-type: none"> • <u>Sustainability Statement</u> • <u>Health Impact Assessment (for applications in South Cambridgeshire only)</u>
<u>LINK TO THE SUSTAINABILITY CHECKLIST</u>	<u>Osc.1, Osc.2, Osc.3, Osc.4, Osc.5</u>

34064	<p>(Object) Section 4: Further approaches to sustainable design and construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>Section 4 highlights some further approaches to the delivery of sustainable design and construction. In most cases the topics are not related to planning policies, and are identified as a series of aspirations rather than matters that can be addressed through the planning system. As identified in Paragraph 4.1.1 of the draft SPD, some of these topics/aspirations are contained in the Cambridgeshire Quality Charter for Growth. It is considered that the draft SPD, which will be used to make decisions on planning applications, is not the appropriate document to set out aspirations.</p>
-------	--

Councils response:

Section 4 of the SPD specifically relates to a number of policies in the South Cambridgeshire Local Plan, notably policies for new settlements, which include requirements for those developments to demonstrate how they are exemplars of sustainability. The topics included within section 4 have therefore been developed following pre-application discussions with the promoters of these sites and respond to the approaches that are being taken to demonstrate this exemplar requirement. The requirements of this section also relate to the implementation of policy 28 of the Cambridge Local Plan. Paragraph 4.5 of the supporting text to this policy notes that in addition to the specific topics referenced in the policy wording, Sustainability Statements should also address other policies relating to sustainability throughout the Cambridge Local Plan, including health and well-being and the provision of

open space, culture, heritage and the quality of built form including efficient use of land. As such, it is considered that the guidance in Section 4, which are also considered to be fundamental aspects of planning's role in placemaking and enabling people to live low carbon lifestyles, is justified. Additional wording will be added to the start of this section however to clarify the policy basis for this section of the SPD.

Change to the SPD.

Add the following table after paragraph 4.1.2:

<u>LOCATION:</u>	<u>Cambridge and South Cambridgeshire</u>
<u>POLICY:</u>	<p><u>Cambridge:</u></p> <ul style="list-style-type: none"> • <u>Policy 28: Carbon reduction, community energy networks, sustainable design, and construction and water use.</u> <p><u>South Cambridgeshire:</u></p> <ul style="list-style-type: none"> • <u>Policy SS/6: Waterbeach New Town (criterion 12)</u> • <u>Policy SS/7: New Village at Bourn Airfield (criterion 9)</u> • <u>Policy SS/8: Cambourne West (Criterion 13)</u> • <u>Policy HQ/1: Design Principles (criteria k, l and m)</u> • <u>Policy SC/2: Health Impact Assessment</u>
<u>SCALE OF DEVELOPMENT</u>	<u>All development (except householder)</u>
<u>TYPE OF DEVELOPMENT</u>	<u>Residential and non-residential</u>
<u>SUBMISSION REQUIREMENTS</u>	<ul style="list-style-type: none"> • <u>Sustainability Statement</u> • <u>Health Impact Assessment (for applications in South Cambridgeshire only)</u>
<u>LINK TO THE SUSTAINABILITY CHECKLIST</u>	<u>Osc.1, Osc.2, Osc.3, Osc.4, Osc.5</u>

34022	<p>(Object) Section 4: Further approaches to sustainable design and construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>Section 4 highlights some further approaches to the delivery of sustainable design and construction. In most cases the topics are not related to planning policies, and are identified as a series of aspirations</p>
-------	---

	rather than matters that can be addressed through the planning system. As identified in Paragraph 4.1.1 of the draft SPD, some of these topics/aspirations are contained in the Cambridgeshire Quality Charter for Growth. It is considered that the draft SPD, which will be used to make decisions on planning applications, is not the appropriate document to set out aspirations.
--	--

Councils response:

Section 4 of the SPD specifically relates to a number of policies in the South Cambridgeshire Local Plan, notably policies for new settlements, which include requirements for those developments to demonstrate how they are exemplars of sustainability. The topics included within section 4 have therefore been developed following pre-application discussions with the promoters of these sites and respond to the approaches that are being taken to demonstrate this exemplar requirement. The requirements of this section also relate to the implementation of policy 28 of the Cambridge Local Plan. Paragraph 4.5 of the supporting text to this policy notes that in addition to the specific topics referenced in the policy wording, Sustainability Statements should also address other policies relating to sustainability throughout the Cambridge Local Plan, including health and well-being and the provision of open space, culture, heritage and the quality of built form including efficient use of land. As such, it is considered that the guidance in Section 4, which are also considered to be fundamental aspects of planning’s role in placemaking and enabling people to live low carbon lifestyles, is justified. Additional wording will be added to the start of this section however to clarify the policy basis for this section of the SPD.

Change to the SPD.

Add the following table after paragraph 4.1.2:

<u>LOCATION:</u>	<u>Cambridge and South Cambridgeshire</u>
<u>POLICY:</u>	<u>Cambridge:</u> <ul style="list-style-type: none"> • <u>Policy 28: Carbon reduction, community energy networks, sustainable design, and construction and water use.</u> <u>South Cambridgeshire:</u> <ul style="list-style-type: none"> • <u>Policy SS/6: Waterbeach New Town (criterion 12)</u> • <u>Policy SS/7: New Village at Bourn Airfield (criterion 9)</u> • <u>Policy SS/8: Cambourne West (Criterion 13)</u> • <u>Policy HQ/1: Design Principles (criteria k, l and m)</u> • <u>Policy SC/2: Health Impact Assessment</u>

<u>SCALE OF DEVELOPMENT</u>	<u>All development (except householder)</u>
<u>TYPE OF DEVELOPMENT</u>	<u>Residential and non-residential</u>
<u>SUBMISSION REQUIREMENTS</u>	<ul style="list-style-type: none"> • <u>Sustainability Statement</u> • <u>Health Impact Assessment (for applications in South Cambridgeshire only)</u>
<u>LINK TO THE SUSTAINABILITY CHECKLIST</u>	<u>Osc.1, Osc.2, Osc.3, Osc.4, Osc.5</u>

Section 4.2: Health and wellbeing

4146	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.2 Health and wellbeing - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>Support overall, but</p> <p>OBJECT to figs 13 and 14. Fig 13 is wrong for an internationally famous historic city with a highly valued historic environment. The importance to wellbeing of the historic environment and the cherished local scene should be highlighted. Fig 14 overlooks the importance of having a pleasant and attractive home in which to live.</p>
<p>Councils response:</p> <p>Figures 13 and 14 are for illustrative purposes only and are taken from work carried out by the UK Green Building Council on the role of the built environment in improving health and wellbeing.</p>	
34144	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.2 Health and wellbeing - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>Section 4.2 deals with health. It is noted that South Cambridgeshire has an adopted Health Impact Assessment SPD. The Health Impact Assessment SPD will be updated to reflect the policies in the South Cambridgeshire Local Plan, but the information and guidance remains relevant and is used to make decisions on planning applications. Therefore, since there is an existing Health Impact Assessment SPD that addresses health matters, it is not necessary to duplicate information in the draft SPD.</p>
<p>Councils response:</p> <p>The SPD is intended to provide guidance for development in both Cambridge and South Cambridgeshire. As the Health Impact Assessment SPD only</p>	

relates to policy in South Cambridgeshire, it is considered appropriate to include general health and wellbeing guidance in the Greater Cambridge Sustainable Design and Construction SPD.

34070	<p>(Comment) Section 4: Further approaches to sustainable design and construction, 4.2 Health and wellbeing - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mrs Kati Preston [2801] Received: 23/9/2019 via Email</p> <p>Welcome areas of section 4 concerned with Health and Well Being, and particularly 4.4 Food Growing. It is continually clear that developers need to face clear, stringent and enforceable regulation in order to ensure the health and well being of residents. Both those already existing in Cambridge, and well as those being brought in by new development. In this respect there are huge difficulties within the sections on water use, noise pollution and air pollution.</p>
-------	--

Councils response:

Comment noted. Policies in relation to water use, air pollution and noise pollution in the local plans have been found to be sound as part of the local plan examinations. Implementation of these policies includes liaison with technical officers from the Councils respective environmental health teams. While it is noted that water use considerations are becoming increasingly important in the light of increasing water stress, the SPD cannot set new policy requirements related to water efficiency levels sought from new development. Further work will be carried out in support of the development of the Greater Cambridge Local Plan, which will also consider whether the setting of more stringent targets for water efficiency should be pursued through policy. However, further information on ways to futureproof developments to enable elements such as retrofitting of rainwater harvesting will be added to the SPD.

Change to the SPD:

Insert new paragraph after 1.17 to read:
The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.

34066	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.2 Health and wellbeing - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353]</p>
-------	---

	<p>Received: 23/9/2019 via Email</p> <p>Section 4.2 deals with health. It is noted that South Cambridgeshire has an adopted Health Impact Assessment SPD. The Health Impact Assessment SPD will be updated to reflect the policies in the South Cambridgeshire Local Plan, but the information and guidance remains relevant and is used to make decisions on planning applications. Therefore, since there is an existing Health Impact Assessment SPD that addresses health matters, it is not necessary to duplicate information in the draft SPD.</p>
<p>Councils response:</p> <p>The SPD is intended to provide guidance for development in both Cambridge and South Cambridgeshire. As the Health Impact Assessment SPD only relates to policy in South Cambridgeshire, it is considered appropriate to include general health and wellbeing guidance in the Greater Cambridge Sustainable Design and Construction SPD.</p>	
34033	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.2 Health and wellbeing - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: No. 6 Developments (Mr Richard Oakley) [8140] Respondent: Cambridge University Hospital NHS Foundation Trust (Carin Charlton) [8141] Received: 23/9/2019 via Email</p> <p>CUH are pleased to see the recognition by the SPD in how the built environment (both internal and external) has a significant role to play in the health and wellbeing of residents, as ultimately this can help to create healthier communities and thus reduce pressure on the NHS system.</p> <p>We support the objectives set out in this section, including the use of Health Impact Assessments.</p> <p>CUH is committed to working with our NHS Partners to ensure that developments make a proportionate contribution towards impacts on the health system. We are also working hard to improve the public realm and landscaping within the campus to improve the environment, visitor experience, and all round health and wellbeing of our patients, staff and visitors.</p> <p>We also welcome best practice initiatives such as the Healthy New Towns initiative at Northstowe and consider that this sort of approach should become the standard in terms of NHS engagement with planning going forward, particular for major developments.</p>
<p>Councils response:</p> <p>Support noted.</p>	
34024	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.2 Health and wellbeing - Draft Greater Cambridge</p>

	<p>Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>Section 4.2 deals with health. It is noted that South Cambridgeshire has an adopted Health Impact Assessment SPD. The Health Impact Assessment SPD will be updated to reflect the policies in the South Cambridgeshire Local Plan, but the information and guidance remains relevant and is used to make decisions on planning applications. Therefore, since there is an existing Health Impact Assessment SPD that addresses health matters, it is not necessary to duplicate information in the draft SPD.</p>
	<p>Councils response:</p> <p>The SPD is intended to provide guidance for development in both Cambridge and South Cambridgeshire. As the Health Impact Assessment SPD only relates to policy in South Cambridgeshire, it is considered appropriate to include general health and wellbeing guidance in the Greater Cambridge Sustainable Design and Construction SPD.</p>
33894	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.2 Health and wellbeing - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Good , general stuff - hopefully familiar to developers and planners but is it needed?</p> <p>That said, in planning, open space for sport is often neglected, as are indoor facilities.</p> <p>Is this relevant and supported by National and Local Plans?</p>
	<p>Councils response:</p> <p>Section 4 of the SPD specifically relates to a number of policies in the South Cambridgeshire Local Plan, notably policies for new settlements, which include requirements for those developments to demonstrate how they are exemplars of sustainability. The topics included within section 4 have therefore been developed following pre-application discussions with the promoters of these sites and respond to the approaches that are being taken to demonstrate this exemplar requirement. The requirements of this section also relate to the implementation of policy 28 of the Cambridge Local Plan. Paragraph 4.5 of the supporting text to this policy notes that in addition to the specific topics referenced in the policy wording, Sustainability Statements should also address other policies relating to sustainability throughout the Cambridge Local Plan, including health and well-being and the provision of open space, culture, heritage and the quality of built form including efficient use of land. As such, it is considered that the guidance in Section 4, which are also considered to be fundamental aspects of planning's role in</p>

placemaking and enabling people to live low carbon lifestyles, is justified.	
33855	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.2 Health and wellbeing - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Crime Prevention Design Team Cambridgeshire (Ms Carol Aston) [7041]</p> <p>Received: 18/7/2019 via Web</p> <p>Developers, architects should, at an early stage, seek advice from Cambridgeshire Police Designing out Crime officers, based at Police Headquarters - to ensure that the principles of Secured by Design are met to create a safe, secure and health living environment for residents, visitors and business premises.</p>
<p>Councils response:</p> <p>Support noted.</p>	

Section 4.3: Modern Methods of Construction

34143	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.3 Modern Methods of Construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200]</p> <p>Respondent: Hill Residential Limited (Colin Campbell) [7524]</p> <p>Received: 23/9/2019 via Email</p> <p>It is very likely that progress towards modern methods of construction and technological advances in the performance of buildings will be subject to rapid change in the future, and as such any policy requirements are likely to become out of date quite quickly. Therefore, policies related to these issues need to be flexible so that changes can be accommodated.</p>
<p>Councils response:</p> <p>Comment noted. It is not the intention of this section of the SPD to be prescriptive as to the use of modern methods of construction (MMC) but to highlight the Councils support for this approach and the role that it has to play in delivering high quality development. Any future policy related to MMC would need to ensure sufficient flexibility.</p>	
34074	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.3 Modern Methods of Construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: South Cambridgeshire District Council (Mr Nick Lockley) [8142]</p> <p>Received: 23/9/2019 via Email</p> <p>The support for Modern Methods of Construction(p165), due to energy efficiency and reduced construction waste is welcomed and will support the Teams objective to contract more of this type of</p>

	construction.
Councils response: Support noted.	
34065	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.3 Modern Methods of Construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Endurance Estates (Mr Jake Nugent) [7353] Received: 23/9/2019 via Email</p> <p>It is very likely that progress towards modern methods of construction and technological advances in the performance of buildings will be subject to rapid change in the future, and as such any policy requirements are likely to become out of date quite quickly. Therefore, policies related to these issues need to be flexible so that changes can be accommodated.</p>
Councils response: Comment noted. It is not the intention of this section of the SPD to be prescriptive as to the use of modern methods of construction (MMC) but to highlight the Councils support for this approach and the role that it has to play in delivering high quality development. Any future policy related to MMC would need to ensure sufficient flexibility.	
34023	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.3 Modern Methods of Construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Axis Land Partnerships (Mr Andrew Adams) [7785] Received: 23/9/2019 via Email</p> <p>It is very likely that progress towards modern methods of construction and technological advances in the performance of buildings will be subject to rapid change in the future, and as such any policy requirements are likely to become out of date quite quickly. Therefore, policies related to these issues need to be flexible so that changes can be accommodated.</p>
Councils response: Comment noted. It is not the intention of this section of the SPD to be prescriptive as to the use of modern methods of construction (MMC) but to highlight the Councils support for this approach and the role that it has to play in delivering high quality development. Any future policy related to MMC would need to ensure sufficient flexibility.	
33924	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.3 Modern Methods of Construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mr . Wookey [3642]</p>

	<p>Received: 23/9/2019 via Web</p> <p>MMC is an excellent way of building higher-quality houses with less waste.</p> <p>I would encourage you to add explicit support for the use of natural building materials. These make healthy buildings and are easy to dispose of or recycle at end-of-life. They contribute to low-carbon or even carbon-negative buildings. For example woodfibre rather than EPS (plastic) insulation, lime rather than cement renders, timber rather than brick base construction. Timber rather than PVC windows.</p>
<p>Councils response:</p> <p>Support noted. Support for materials with low embodied energy is contained within section 4.6 of the SPD, and further consideration to embodied energy and the role that this has to play in supporting net zero carbon development will be carried out as part of work on the Greater Cambridge Local Plan.</p>	
33893	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.3 Modern Methods of Construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109]</p> <p>Received: 23/9/2019 via Web</p> <p>Very thin - interesting to see if SCDC means 4.3.3 and whether acceptable to Parishes.</p> <p>Is this relevant and supported by National and Local Plans?</p>
<p>Councils response:</p> <p>Section 4 of the SPD specifically relates to a number of policies in the South Cambridgeshire Local Plan, notably policies for new settlements, which include requirements for those developments to demonstrate how they are exemplars of sustainability. The topics included within section 4, including the role of modern methods of construction, have therefore been developed following pre-application discussions with the promoters of these sites and respond to the approaches that are being taken to demonstrate this exemplar requirement. The information contained within the SPD is kept to a very high level given that progress towards modern methods of construction and technological advances in the performance of buildings will be subject to rapid change in the future. As such, it is not the intention of this section of the SPD to be prescriptive as to the use of modern methods of construction (MMC) but to highlight the Councils support for this approach and the role that it has to play in delivering high quality development.</p>	
33854	<p>(Comment) Section 4: Further approaches to sustainable design and construction, 4.3 Modern Methods of Construction - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Forestry Commission (Mr Neil Jarvis) [7340]</p> <p>Received: 17/7/2019 via Web</p> <p>With regard to construction materials with Low Embodied Energy</p>

	(LEE), whole timber, laminates and chip board have far lower EBB than masonry, concrete and metals. In addition atmospheric carbon is taken up by trees and therefore the use of wood products locks in carbon to a construction for the life time of the building. Furthermore, the use of UK sourced timber rather than imported would greatly reduce the energy budget involved in transportation. The Forestry Commission therefore recommends inclusion of guidance on increasing the use of wood products in construction and wherever possible the use of UK sourced timber.
--	---

Councils response:
 Comment noted. Support for materials with low embodied energy, including timber, is contained within section 4.6 of the SPD, and further consideration to embodied energy and the role that this has to play in supporting net zero carbon development will be carried out as part of work on the Greater Cambridge Local Plan.

Section 4.4: Food growing as part of new developments

089	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.4 Food growing as part of new developments - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mrs Kati Preston [2801] Received: 23/9/2019 via Email</p> <p>The inclusion of this section containing the recommendation for new developments to include allotment provision, and for developers to create and incorporate further opportunities for food growing within new developments is greatly welcomed.</p> <p>Absolutely endorse the benefits as stated in 4.4.3, and would like to add that one of the means for us to increase the sustainability of our food systems overall is for all of us to have the capacity, and opportunity to have direct contact with where our food comes from.</p> <p>It can also greatly enhance community cohesion, as demonstrated at Empty Common Community Garden</p> <p>Would hope that if adopted, this SPD can provide the means for the council to expand and extend the opportunities for community food growing.</p>
-----	---

Councils response:
 Support noted.

34085	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.4 Food growing as part of new developments - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p>
-------	--

	<p>Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033] Received: 23/9/2019 via Email</p> <p>Residents support the opportunity for new developments to incorporate opportunities for food growing into design. They would like to see this relate to a broader based strategy for sustainable food growing and land use and organic farming.</p>
<p>Councils response:</p> <p>Support noted. With regards to a broader based strategy for sustainable food growing and land use and organic farming, the scope of this is beyond the remit of the SPD. However, Cambridge City Council have developed a Sustainable Food Policy (https://www.cambridge.gov.uk/media/6869/sustainable-food-policy-statement.pdf) and are a part of the Cambridge Sustainable Food initiative.</p>	
34071	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.4 Food growing as part of new developments - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mrs Kati Preston [2801] Received: 23/9/2019 via Email</p> <p>Welcome areas of section 4 concerned with Health and Well Being, and particularly 4.4 Food Growing.</p>
<p>Councils response:</p> <p>Support noted.</p>	
34002	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.4 Food growing as part of new developments - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email</p> <p>Natural England fully supports the encouragement and recommendations for incorporating food growing areas within developments, for all of the benefits cited including enhancing health and wellbeing, low carbon lifestyles, biodiversity and greening the urban landscape.</p>
<p>Councils response:</p> <p>Support noted.</p>	
33922	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.4 Food growing as part of new developments - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mrs Gemma Birley [8117] Received: 23/9/2019 via Web</p> <p>Excellent to see food growing included within the SPD. As Project</p>

	<p>Manager at Cambridge Sustainable Food and environmental consultant, I would very much welcome its inclusion in the SPD. The criteria set out are in the document are comprehensive.</p>
<p>Councils response: Support noted.</p>	
33892	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.4 Food growing as part of new developments - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Allotments and community orchards in POS alongside sports pitches etc.? - have they forgotten that villages still have farms?</p> <p>Is this relevant and supported by National and Local Plans?</p>
<p>Councils response: Section 4 of the SPD specifically relates to a number of policies in the South Cambridgeshire Local Plan, notably policies for new settlements, which include requirements for those developments to demonstrate how they are exemplars of sustainability. The topics included within section 4 have therefore been developed following pre-application discussions with the promoters of these sites and respond to the approaches that are being taken to demonstrate this exemplar requirement. The requirements of this section also relate to the implementation of policy 28 of the Cambridge Local Plan. Paragraph 4.5 of the supporting text to this policy notes that in addition to the specific topics referenced in the policy wording, Sustainability Statements should also address other policies relating to sustainability throughout the Cambridge Local Plan, including health and well-being and the provision of open space, culture, heritage and the quality of built form including efficient use of land. As such, it is considered that the guidance in Section 4, which are also considered to be fundamental aspects of planning's role in placemaking and enabling people to live low carbon lifestyles, is justified.</p>	

Section 4.5: Smart technologies

34003	<p>(Support) Section 4: Further approaches to sustainable design and construction, 4.5 Smart technologies - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email</p> <p>We welcome encouragement of smart technologies and responsible sourcing of building materials and embodied carbon for the contributions these can make towards climate change adaptation and mitigation.</p>
<p>Councils response:</p>	

Support noted.	
33891	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.5 Smart technologies - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Technology to improve construction; smart mobility (very anti-car); and smart grids with dated efficiency data based on coal-fired generation.</p> <p>Smart cities and smart places deploy toys and infrastructure that are more appropriate to high density wifi-rich places like San Francisco (and maybe Cambridge) than rural SCDC.</p> <p>Is this relevant and supported by National and Local Plans?</p>
<p>Councils response:</p> <p>Smart technology is applicable to a wide range of settings and the work being carried out by the Smart Places Initiative includes the consideration of the role of smart technologies in villages and towns as well as cities. Smart technologies can help to support the transition to low carbon lifestyles and as such is of significant relevance to plan making and as such is supported by both national and local policy.</p>	

Section 4.6: Responsible sourcing of building materials and embodied energy

34147	<p>(Object) Section 4: Further approaches to sustainable design and construction, 4.6 Responsible sourcing of building materials and embodied carbon - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295] Received: 23/9/2019 via Email</p> <p>OBJECT to 4.6.1 - 4.6.6 in that they do not mention embodied energy of existing buildings, and the desirability of retaining and re-using existing buildings and their component materials. Proposals should be assessed in terms of whole life cycle in accordance with BS EN 15978; this assessment should include the embodied energy of any existing structures, the potential future re-usability of components and materials of the new building (use lime mortar not cement), and the carbon costs of disposal.</p>
<p>Councils response:</p> <p>While the importance of the consideration of embodied energy in existing buildings is noted, it is considered that any attempt to require proposals to be assessed against BS EN 15978 would constitute new policy. SPDs cannot be used to set new policy requirements but to provide guidance on the implementation of existing policy. Further consideration to embodied energy and the role that this has to play in supporting net zero carbon development</p>	

will be carried out as part of work on the Greater Cambridge Local Plan	
33967	<p>(Comment) Section 4: Further approaches to sustainable design and construction, 4.6 Responsible sourcing of building materials and embodied carbon - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email</p> <p>With regards to Section 4.6 which discusses embodied energy there needs to be a measurable standard or target which applicants are required to meet in relation to the existing 2018 Local Plan Policy 28. Firstly the policy and/or guidance needs to set out standard targets that applicants need to meet. Secondly the proposed Sustainability checklist (Osc.1) needs to include a specific method of calculating embodied energy in order to meet targets. Oxford City Council require a Natural Resource Impact Analysis with all applications which sets out target standards and scores with a checklist to calculate the score. This could be used as an example.</p>
Councils response:	
We would agree that there should be a measurable standard or target related to embodied carbon, however this is not something that can be introduced as part of an SPD. Further consideration to embodied energy and the role that this has to play in supporting net zero carbon development will be carried out as part of work on the Greater Cambridge Local Plan.	
33890	<p>(Comment) Section 4: Further approaches to sustainable design and construction, 4.6 Responsible sourcing of building materials and embodied carbon - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 23/9/2019 via Web</p> <p>Source verification of materials is likely to add significant costs with minimal tangible benefit. Is this relevant and supported by National and Local Plans?</p>
Councils response:	
The use of sustainably sourced materials is now common practice across the construction industry and has a significant role to play in reducing the environmental impact of the construction industry. Given the level of new development envisaged by the adopted local plans, it is considered that the issue of the responsible sourcing of materials and reducing the impact of construction is of great significance and in keeping with legal duties placed on local planning authorities by the Climate Change Act.	

Appendix 1: Sustainability Checklist

148	(Object) Appendix 1: Sustainability Checklist - Draft Greater
-----	--

	<p>Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: John Preston [5295] Received: 23/9/2019 via Email Support overall, but OBJECT to Sustainability checklist as drafted. Ha.1, Ha.2, Ha.3, and Ha.4 should all cross reference to the Government's retrofit guidance PAS 2035:2019, and the special consideration for historic and traditional buildings under Parts L1B and L2B of the Building Regulations.</p> <p>Osc.1 should consider the embodied carbon of existing buildings.</p>
	<p>Councils response: Reference to PAS 2035 and other guidance related to heritage assets has been included in the relevant sections of the SPD, which should be read alongside the Sustainability Checklist. As such, it is not considered necessary to repeat references to this and other guidance in the checklist itself.</p>
34145	<p>(Object) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Carter Jonas (Mr Brian Flynn) [2200] Respondent: Hill Residential Limited (Colin Campbell) [7524] Received: 23/9/2019 via Email</p> <p>It is considered that the Sustainability Checklist is the most useful part of the draft SPD, and should be the main focus of the document. The Sustainability Checklist should be the main tool used by applicants preparing applications, statutory consultees commenting on applications, and decision makers when considering whether a proposed development meets the policy requirements for sustainable development. As set out above, it is suggested that the format of the draft SPD could be much simpler, so that it avoids duplicating guidance already provided elsewhere. It is requested that a more effective approach would be for the draft SPD to simply reference that other guidance where relevant and as appropriate rather than restate it.</p> <p>It is considered that a single Sustainability Checklist could be prepared for both Cambridge and South Cambridgeshire.</p> <p>It is requested that an additional column is added to the Sustainability Checklist to include information on relevant guidance from the National Planning Policy Framework, Planning Practice Guidance, adopted SPDs, and national good practice guidance; this approach would direct potential users of the draft SPD to other relevant guidance. It is anticipated that for most Sustainability Checklist topics the appropriate response would be to refer to relevant paragraphs or sections of another supporting application document; this approach would avoid duplication of documents and information.</p>
	<p>Councils response: Support for the checklist is noted. However, the checklist has been designed to be a tool to ensure that from an early stage, considerations related to</p>

sustainable design and construction and meeting policy requirements are integrated into the design of development proposals. It therefore acts as a supplement to the more detailed guidance contained in the main body of the SPD, and needs to be submitted alongside more detailed documents such as the Sustainability Statement, Carbon Reduction/Renewable Energy Reports and other documentation. It is considered that addition of a column containing links to guidance such as the Planning Practice Guide would make the checklist too cluttered. Given that policies vary across Cambridge and South Cambridgeshire, it is also considered at this stage that a single checklist for Greater Cambridge would be too complex. However, it is the intention for the integration of policy related to sustainable design and construction as part of work on the Greater Cambridge local Plan, which should lead to a single checklist in the future.

(Object) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019
 Agent: Carter Jonas (Mr Brian Flynn) [2200]
 Respondent: **Endurance Estates (Mr Jake Nugent) [7353]**
 Received: **23/9/2019 via Email**

34067 It is considered that the Sustainability Checklist is the most useful part of the draft SPD, and should be the main focus of the document. The Sustainability Checklist should be the main tool used by applicants preparing applications, statutory consultees commenting on applications, and decision makers when considering whether a proposed development meets the policy requirements for sustainable development. As set out above, it is suggested that the format of the draft SPD could be much simpler, so that it avoids duplicating guidance already provided elsewhere. It is requested that a more effective approach would be for the draft SPD to simply reference that other guidance where relevant and as appropriate rather than restate it.

It is considered that a single Sustainability Checklist could be prepared for both Cambridge and South Cambridgeshire.

It is requested that an additional column is added to the Sustainability Checklist to include information on relevant guidance from the National Planning Policy Framework, Planning Practice Guidance, adopted SPDs, and national good practice guidance; this approach would direct potential users of the draft SPD to other relevant guidance.

Councils response:
 Support for the checklist is noted. However, the checklist has been designed to be a tool to ensure that from an early stage, considerations related to sustainable design and construction and meeting policy requirements are integrated into the design of development proposals. It therefore acts as a supplement to the more detailed guidance contained in the main body of the SPD, and needs to be submitted alongside more detailed documents such as the Sustainability Statement, Carbon Reduction/Renewable Energy Reports and other documentation. It is considered that addition of a column containing links to guidance such as the Planning Practice Guide would make the checklist too cluttered. Given that policies vary across Cambridge and

<p>South Cambridgeshire, it is also considered at this stage that a single checklist for Greater Cambridge would be too complex. However, it is the intention for the integration of policy related to sustainable design and construction as part of work on the Greater Cambridge local Plan, which should lead to a single checklist in the future.</p>	
34047	<p>(Object) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email Sustainability checklist for applications in South Cambridgeshire, En.2 - States other on-site energy requirements be taken into account. As noted in Paragraph 9 of this Note this requirement goes beyond the requirements Policy CC/3 and is not considered appropriate and should be removed.</p>
<p>Councils response: Comment noted. It is noted that the requirements of policy CC/3 relate to regulated emissions only and as such reference to other onsite requirements will be removed from Table 3.4.</p> <p>Change to the SPD: Amend the links to the sustainability checklist numbering in the table on page 44 of the SPD.</p> <p>Remove En.2 from the checklist and renumber the checklist accordingly.</p>	
34046	<p>(Object) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Agent: Turley (Paul White) [8111] (unconfirmed) Respondent: Countryside Properties (UK) Limited and The Taylor Family [7429] Received: 23/9/2019 via Email Sustainability checklist for applications in Cambridge, Wat.2 - As noted in Paragraph 10 of this note Countryside request that the requirement for achieving 5 Wat01 credits be reduced recognising that this will not be technically feasible for smaller development and a proportionate water reduction target is proposed.</p>
<p>Councils response: Concern noted. The requirements of policy 28 and Wat.2 were developed in response to evidence contained in the Water Cycle Strategy and the Cambridge Water Resource Management Plan in relation to the levels of water stress facing the area and the measures required to support the long term sustainability of water resources. This requirement was subject to viability testing as part of the local plan and was found to be viable. However, it is noted that for some schemes it is not always technically feasible to meet the requirements of the policy in full. Policy 28 does allow for feasibility and viability to be taken into account, with further guidance in relation to this in paragraphs 3.1.3 and 3.1.4 of the SPD. Where full compliance with the</p>	

requirements of policy 28 is not possible, this will be considered on a case by case basis and should be raised as part of the pre-application process. As such, it is not considered necessary to amend the SPD or the policy requirements for Cambridge further.

34045 **(Object) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019**
Agent: Turley (Paul White) [8111] (unconfirmed)
Respondent: **Countryside Properties (UK) Limited and The Taylor Family [7429]**
Received: **23/9/2019 via Email**
Sustainability checklist for applications in Cambridge, En.1 - As noted in Paragraph 5 of this note Countryside request that reference to the 44% carbon reduction requirement is removed in lieu of the more up to date 19% carbon reduction requirement, making provision for changes to the future Building Regulations.

Councils response:
Concern noted. Reference to the 44% reduction on Part L 2006 will be removed from Ene.1 and replace with reference to a 19% reduction on Part L 2013.

Change to the SPD:
Amend Ene.1 to read:
For residential schemes have you followed the energy hierarchy in order to achieve the 44% reduction on Part L 2006 (19% reduction on Part L 2013) requirement set out in policy 28?

34025 **(Object) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019**
Agent: Carter Jonas (Mr Brian Flynn) [2200]
Respondent: **Axis Land Partnerships (Mr Andrew Adams) [7785]**
Received: **23/9/2019 via Email**
It is considered that the Sustainability Checklist is the most useful part of the draft SPD, and should be the main focus of the document. The Sustainability Checklist should be the main tool used by applicants preparing applications, statutory consultees commenting on applications, and decision makers when considering whether a proposed development meets the policy requirements for sustainable development. As set out above, it is suggested that the format of the draft SPD could be much simpler, so that it avoids duplicating guidance already provided elsewhere.

It is considered that a single Sustainability Checklist could be prepared for both Cambridge and South Cambridgeshire.

It is requested that an additional column is added to the Sustainability Checklist to include information on relevant guidance from the National Planning Policy Framework, Planning Practice Guidance, adopted SPDs, and national good practice guidance; this approach would direct potential users of the draft SPD to other relevant guidance.

<p>Councils response: Support for the checklist is noted. However, the checklist has been designed to be a tool to ensure that from an early stage, considerations related to sustainable design and construction and meeting policy requirements are integrated into the design of development proposals. It therefore acts as a supplement to the more detailed guidance contained in the main body of the SPD, and needs to be submitted alongside more detailed documents such as the Sustainability Statement, Carbon Reduction/Renewable Energy Reports and other documentation. It is considered that addition of a column containing links to guidance such as the Planning Practice Guide would make the checklist too cluttered. Given that policies vary across Cambridge and South Cambridgeshire, it is also considered at this stage that a single checklist for Greater Cambridge would be too complex. However, it is the intention for the integration of policy related to sustainable design and construction as part of work on the Greater Cambridge local Plan, which should lead to a single checklist in the future.</p>	
34004	<p>(Comment) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Natural England (Janet Nuttall) [1009] Received: 23/9/2019 via Email</p> <p>Natural England is supportive of the checklist requirements relating to biodiversity including submission of a Preliminary Ecological Assessment, detailed habitats and species surveys, application of the mitigation hierarchy, demonstration of biodiversity net gain and use of the LNP Developing with Nature Toolkit.</p> <p>As mentioned above, the checklists should ensure that development likely to affect a European site is accompanied by sufficient information to enable the LPA, as Competent Authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), to record its decision with regard to likely significant effect and to undertake Appropriate Assessment where necessary.</p>
<p>Councils response: Support for the checklist noted. An additional question will be added to both checklists in relation to development proposals that are likely to affect a European site.</p> <p>Change to the SPD: Add an additional question to the Biodiversity sections of Appendix 1a and 1b as follows: <u>Bio.10 For development likely to affect a European site, what information have you provided to enable the local planning authority, as Competent Authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended) to record its decision with regard to likely significant effect, including undertaking Appropriate Assessment where necessary?</u></p>	
33977	<p>(Comment) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p>

	<p>Respondent: Mole Architects (Mr Meredith Bowles) [371] Received: 23/9/2019 via Email Sustainability Checklist Cambridge This should reflect a higher commitment target for carbon reduction, given it refers to Part L 2013 - This is likely to be superseded by now. Sustainability Checklist South Cambridgeshire SuSh.1 For residential developments that will include a show home, can you give benchmarking standards for the Show Homes?</p>
<p>Councils response: The SPD can only provide guidance on adopted policy and as such, cannot be used to amend current policy requirements related to energy and carbon reduction. It is recognised that the requirements in the adopted Local Plan will be subject to change as a result of future changes to Building Regulations and as such wording will be included in the SPD in relation to the need for further guidance on the implementation of policy once these changes are known. Additional text will be added to the introduction of the SPD in order to encourage developers to futureproof their proposals so that they can be more easily adapted in the future to help support the transition to a zero carbon society.</p> <p>With regards to the provision of benchmarking standards for Show Homes, the precise range of measures to be included in the Show Home will be dependent on the baseline specification of each project in question, making benchmarking difficult. As such, the guidance in the SPD gives an indication of the types of measures that could be included, but this will need to be determined on a case by case basis.</p> <p>Change to the SPD: Insert new paragraph after 1.17 to read: <u>The councils will, however, be supportive of proposals that seek to futureproof developments so that they can be more easily adapted to support the transition to net zero carbon in the future. For example, we would encourage heating systems to be designed to operate at a lower temperature of 55°C or lower in the final heating circuit. This would make it easier to install heat pumps or district heating in the future. With regards to water efficiency, we would encourage developers to provide 'stage 1 fit' pipework for rainwater harvesting so that residents can purchase their own rainwater harvesting systems without incurring the significant expense of an interior retrofit.</u></p>	
33965	<p>(Support) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Historic England (Mrs Debbie Mack) [5828] Received: 23/9/2019 via Email Checklist p171 and 181 We welcome the specific historic environment questions on page 171 and 181 of the tables.</p>
<p>Councils response: Support noted.</p>	
33887	<p>(Object) Appendix 1: Sustainability Checklist - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p>

	<p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 22/9/2019 via Web Not clear how this is "marked" Is there a pass/fail? How will appeals work? Is it a "general conformance" or "absolute compliance" test?</p>
<p>Councils response: Comment noted. The checklist has been designed to be a tool to ensure that from an early stage, considerations related to sustainable design and construction and meeting policy requirements are integrated into the design of development proposals. It therefore acts as a supplement to the more detailed guidance contained in the main body of the SPD, and needs to be submitted alongside more detailed documents such as the Sustainability Statement, Carbon Reduction/Renewable Energy Reports and other documentation. The Councils will seek compliance with policies unless considerations related to technical feasibility or viability require an alternative approach to be taken.</p>	

Appendix 2: Carbon reduction template for including in Carbon Reduction Statement for residential development – Cambridge only

886	<p>(Comment) Appendix 2: Carbon reduction template - Cambridge - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 22/9/2019 via Web Cambridge specific</p>
<p>Councils response: Appendix 2 relates to applications submitted in Cambridge, with specific reference to the requirement of policy 28 of the Cambridge Local Plan. Guidance for proposals in South Cambridgeshire is contained within Appendix 5.</p>	

Appendix 3: Gas Fired Combined Heat and Power (CHP) Advice Note

34149	<p>(Object) Appendix 3: Gas Fired CHP Advice Note - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: John Preston [5295] Received: 23/9/2019 via Email OBJECT to Appendix 3 as drafted. This needs to take account of latest Climate Change Committee advice.</p>
<p>Councils response: Concern noted. It is recognised that as we move towards net zero carbon development, gas fired Combined Heat and Power will become redundant. However, it is considered that where applied correctly, gas fired CHP still has a role to play in helping to reduce the carbon emissions associated with new</p>	

<p>development and it can also help to support the development of heat networks, which would allow for a wide range of renewable heat technologies to be utilised in the future. Where gas CHP is to be used, it is important to ensure that it is specified in such a way as to reduce any potential air quality impacts associated with the use of this technology. As such, it is considered that the guidance in Appendix 3 is still required for the time being.</p>	
33885	<p>(Object) Appendix 3: Gas Fired CHP Advice Note - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109]</p> <p>Received: 22/9/2019 via Web</p> <p>Probably irrelevant to SCDC as AQMA should be eliminated by A14 work.</p>
<p>Councils response:</p> <p>Even outside of the AQMA, the use of gas fired Combined Heat and Power has the potential to create air quality impacts. As such it is important that mitigation measures are put in place to reduce this aspect, hence the need for the guidance contained in this appendix.</p>	

Appendix 4: Home Energy Questionnaire

34150	<p>(Object) Appendix 4: Home Energy Questionnaire - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: John Preston [5295]</p> <p>Received: 23/9/2019 via Email</p> <p>OBJECT to Appendix 4 as drafted. Needs to cross-reference PAS 2035:2019.</p>
<p>Councils response:</p> <p>Reference to PAS 2035 has been included in the Section 3.2 of the SPD, which should be read alongside the Home Energy Questionnaire contained in Appendix 4. As such, it is not considered necessary to repeat references to this and other guidance in the appendix itself. However, a cross reference to section 3.2 will be included in the wording at the start of the questionnaire.</p> <p>Change to the SPD:</p> <p>Include the following wording at the end of the first paragraph of Appendix 4: <u>For further guidance on the implementation of policy 30, see section 3.2 paragraphs 3.2.8 – 3.2.13 of the Greater Cambridge Sustainable Design and Construction SPD.</u></p> <p>Add a new question following question 3 as follows: <u>Is the property a Listed Building?</u> <u>Yes No</u></p>	
33884	<p>(Comment) Appendix 4: Home Energy Questionnaire - Draft</p>

	<p>Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109]</p> <p>Received: 22/9/2019 via Web</p> <p>Cambridge specific</p>
--	--

Councils response:

The guidance contained within Appendix 4 relates to policy 30 of the Cambridge Local Plan. There is no equivalent policy for South Cambridgeshire, hence why this Appendix only applies to relevant applications in Cambridge.

Appendix 5: Carbon reduction proforma for applications in South Cambridgeshire

33883	<p>(Comment) Appendix 5: Carbon reduction proformas for applications in South Cambridgeshire - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109]</p> <p>Received: 22/9/2019 via Web</p> <p>SCDC Report carbon reduction form</p>
-------	---

Councils response:

Appendix 5 relates to applications submitted in South Cambridgeshire, with specific reference to the requirement of policy CC/3 of the South Cambridgeshire Local Plan. Guidance for proposals in Cambridge is contained within Appendix 2.

Appendix 6: Requirements for Specific Lighting Schemes

63	<p>(Comment) Appendix 6: Requirements for Specific lighting Schemes - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe) [7033]</p> <p>Received: 23/9/2019 via Email</p> <p>For all-night lighting at low brightness use a compact fluorescent porch light of 9W (600 lumen); members say this is probably taken from an old existing document. It should be LED low power lighting that is not mercury based as per a compact fluorescent lamp.</p>
----	--

Councils response:

Comment noted. As stated in the SPD the general lighting advice and requirements in Appendix 6: Requirements for Specific Lighting Schemes have been adapted from the Department of the Environment and the Countryside Commission publication, Lighting in the Countryside: Towards Good Practice, 1997. The majority of the advice relates to minimising light pollution and glare and the principles detailed still apply. However, it is

acknowledged that all fluorescent luminaire contain a very small trace amount of mercury vapour in order to operate efficiently. It is sealed within the glass tubing and is not released when the bulbs are intact or in use, but its presence has raised questions about the safety and wider environmental impact of CFLs over their lifecycle.

Paragraph 3.6.18 under the heading The Design of the Lighting Proposed (General lighting requirements) states under point vii that 'The lights used should be the most efficient taking into account cost, energy use, colour rendering and the purpose of the lighting scheme required. All lighting schemes should meet British Standards.'

However, the advancements in energy efficiency of lighting technology are noted and the use of LED lighting should be reflected in the SPD.

Change to the SPD:

Amend paragraph 7 of Appendix 6 to read:

For all-night lighting at low brightness use ~~a compact fluorescent~~ an LED porch light of 9W (600 lumen)

33939	<p>(Comment) Appendix 6: Requirements for Specific lighting Schemes - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019 Respondent: Cambridge Past, Present & Future (Mr James Littlewood) [8127] Received: 23/9/2019 via Email For all-night lighting at low brightness use a compact fluorescent porch light of 9W (600 lumen); This is probably taken from an old existing document. Should be LED low power lighting that is not mercury based as per a compact fluorescent lamp.</p>
-------	--

Councils response:

Comment noted. As stated in the SPD the general lighting advice and requirements in Appendix 6: Requirements for Specific Lighting Schemes have been adapted from the Department of the Environment and the Countryside Commission publication, Lighting in the Countryside: Towards Good Practice, 1997. The majority of the advice relates to minimising light pollution and glare and the principles detailed still apply. However, it is acknowledged that all fluorescent luminaire contain a very small trace amount of mercury vapour in order to operate efficiently. It is sealed within the glass tubing and is not released when the bulbs are intact or in use, but its presence has raised questions about the safety and wider environmental impact of CFLs over their lifecycle.

Paragraph 3.6.18 under the heading The Design of the Lighting Proposed (General lighting requirements) states under point vii that 'The lights used should be the most efficient taking into account cost, energy use, colour rendering and the purpose of the lighting scheme required. All lighting schemes should meet British Standards.'

However, the advancements in energy efficiency of lighting technology are noted and the use of LED lighting should be reflected in the SPD.

Change to the SPD:

Amend paragraph 7 of Appendix 6 to read:

For all-night lighting at low brightness use a compact fluorescent an LED porch light of 9W (600 lumen)

33882	<p>(Object) Appendix 6: Requirements for Specific lighting Schemes - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 22/9/2019 via Web</p> <p>More guidance on lighting - would this be enough on its own?</p>
-------	---

Councils response:

Comment noted. The guidance provided is considered proportionate and sufficient having regard to national and local policies.

Appendix 7: The Development of Potentially Contaminated Sites in Cambridge and South Cambridgeshire: A Developers Guide

81	<p>(Object) Appendix 7: The development of potentially contaminated sites in Cambridge and South Cambridgeshire - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 22/9/2019 via Web</p> <p>Noddy's guide to development process for contaminated sites</p>
----	---

Councils response:

Comment noted. The guidance provided is considered proportionate and sufficient having regard to national and local policies.

Appendix 8: Further technical guidance related to noise pollution

880	<p>(Object) Appendix 8: Further technical guidance related to noise pollution - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Cottenham Parish Council (Frank Morris) [8109] Received: 22/9/2019 via Web</p> <p>27pp. Yet more on noise pollution</p>
-----	---

Councils response:

Comment noted. The guidance provided is considered proportionate and sufficient having regard to national and local policies.

Acronyms

No comments.

Glossary

33966	<p>(Comment) Glossary - Draft Greater Cambridge Sustainable Design and Construction SPD - July 2019</p> <p>Respondent: Historic England (Mrs Debbie Mack) [5828] Received: 23/9/2019 via Email</p> <p>Glossary We recommend the inclusion of the definition of setting and significance (in relation to heritage assets) in the glossary.</p>
<p>Councils response: Comment noted – definitions will be added to the glossary as suggested.</p> <p>Change to the SPD: Add the following definitions to the glossary:</p> <p><u>Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.</u></p> <p><u>Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.</u></p>	

Sustainability Appraisal and Habitats Regulations Assessment Screening Report

34005	<p>(Support) Sustainability Appraisal Scoping Report Respondent: Natural England (Janet Nuttall)</p> <p>We agree with the conclusions of the Sustainability Appraisal Screening (June 2019) report that the SPD will not give rise to significant environmental effects beyond those already identified as part of the appraisal of the parent policies and site allocation contained within the adopted 2018 Cambridge and South Cambridgeshire Local Plans. The Plan can therefore be screened out of the requirement for a separate Sustainability Appraisal.</p>
<p>Councils response:</p>	

Support noted	
34007	<p>(Support) Sustainability Appraisal Scoping Report Respondent: Historic England (Mrs Debbie Mack)</p> <p>In terms of our area of interest, given the nature of the SPD, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing Policies contained within a Adopted Development Plan Document which has already been subject to a Sustainability Appraisal/SEA. As a result, we would endorse the Authority's conclusions that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD.</p>
<p>Councils response: Support noted.</p>	

34006	<p>(Support) Habitats Regulations Screening Report Respondent: Natural England (Janet Nuttall)</p> <p>Natural England is satisfied with the conclusions of the Draft Habitats Regulations Assessment Screening (June 2019) report that the draft Greater Cambridge Sustainable Design and Construction SPD is unlikely to have any significant impacts on the conservation objectives of Natura 2000 and Ramsar sites. We agree that it is not necessary to proceed to the next stage of the Habitats Regulations Assessment process i.e. Appropriate Assessment.</p>
<p>Councils response: Support noted</p>	

34088	<p>(Object) Habitats Regulations Screening Assessment Respondent: Federation of Cambridge Residents' Associations (Wendy Blythe)</p> <p>The accompanying HRA is deficient as it presumes mitigation of water abstraction by "increased efficiency" will allow sufficient water to be available without impacts on European sites. As indicated there is finite water available, so this is a nonsensical approach.</p> <p>The existing text states : "As such, it is unlikely that the draft SPD will have significant impacts on water quantity and quality of the Natura 2000 and Ramsar sites".</p> <p>This ignores in-combination and cumulative effects of individual developments and climate change and is not a sufficiently robust approach to meet the precautionary principle. Furthermore "unlikely"</p>
-------	---

	<p>does not meet the required burden of proof under the Habitat Regulations as being beyond reasonable doubt (viz Waddenzee 2004 https://eurlex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62002CJ0127).</p> <p>The accompanying Habitat Regulations Assessment cannot reach its conclusion of no impact based on present evidence and furthermore should be aware of "People over wind/Sweetman" C 323/17 decision (https://bit.ly/2KF2ikQ)</p>
--	--

Councils response:

The SPD does not make any amendments to the identified parent policies related to water efficiency contained within the Cambridge and South Cambridgeshire Local Plans but rather identifies, for the purposes of residential and non-residential development, what is likely to be required to secure compliance with the identified policies. The local plans were subject to a Habitats Regulations Assessment Screening Process, which concluded that the policies and proposals in the plans were not likely to have a significant effect on Natura 2000 and Ramsar sites, a conclusion supported by Natural England. Following the judgement by the Court of Justice of the European Union in the case of People over Wind, Peter Sweetman v Coillte Teoranta the HRA screening process was reviewed in 2018 for the Council. The review (RD/EX/160) concluded that the conclusions of the previous HRA screening reports remain valid. The Screening Report for the Greater Cambridge Sustainable Design and Construction SPD has been reviewed by Natural England who support the finding that the SPD is not likely to have any significant impacts on the conservation objectives of Natura 2000 and Ramsar sites, and agree that it is not necessary to proceed to the next stage of the Habitats Regulations Assessment process i.e. Appropriate Assessment. The approach within the Screening Report is considered to be consistent with the People over Wind decision of the European Court.

Appendix A: Statement of Consultation

Appendix 1: Consultees

The following organisations were directly notified of the consultation on the draft Greater Cambridge Sustainable Design and Construction SPD in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) via email, or post where no email address was available. Individuals are not listed. It should be noted that other individuals and organisations will also be contacted that do not appear on this list.

Abington Piggots Parish Council
All Cambridge City Councillors, South Cambridgeshire District Council
Councillors and Cambridgeshire County Council Ward Councillors for
Cambridge and South Cambridgeshire
Anglian Water
Advisory Council for the Education of Gypsy and other Travellers (ACERT)
Age UK Cambridgeshire and Peterborough
AMEC Foster Wheeler E&I UK Ltd (on behalf of National Grid)
Arrington Parish Council
Axiom Developments
Babraham Research Campus
Babraham Parish Council
Balsham Parish Council
Bar Hill Parish Council
Barrington Parish Council
Bartlow Parish Council
Barton Parish Council
Bassingbourn-cum-Kneesworth Parish Council
Barker Parry
Berkeley Group
Bidwells
Birdwood Road RA
Bourn Parish Council
Boxworth Parish Council
Bradmore and Petersfield RA
British Romany Union
Caldecote Parish Council
Cambourne Parish Council
Cam Health
Cam Sight
Cambridge Carbon Footprint
Cambridge Friends of the Earth
Cambridge Older Persons Enterprise (COPE)
Cambridge Past, Present and Future
Cambridge Sustainable Food
Cambridge University Hospitals NHS Foundation Trust
Cambridge Water
Cambridgeshire and Peterborough Combined Authority
Cambridgeshire Constabulary
Cambridgeshire County Council

Cambridgeshire Police and Crime Commissioner
Carbon Neutral Cambridge
Carlton cum Willingham Parish Council
Carter Jonas
CastleOak
Castle Camps Parish Council
Caxton Parish Council
Childerley Parish Council
Chancellor, Masters and Scholars of the University of Cambridge
Civil Aviation Authority
Clarendon Land & Development Ltd
Comberton Parish Council
Conington Parish Council
Coton Parish Council
Cottenham Parish Council
Croxtan Parish Council
Croydon Parish Council
Deloitte
DPDS Consulting Group
Dry Drayton Parish Council
Durman Stearn
Duxford Parish Council
Eclipse Planning Services
Elswoth Parish Council
Eltisley Parish Council
Environment Agency
Eversdens Parish Council
FECRA
Fen Ditton Parish Council
Fen Drayton Parish Council
Fowlmere Parish Council
Foxtan Parish Council
Friends of Stourbridge Common RA
Fulbourn Parish Council
Gallagher Estates
Gamlingay Parish Council
Girton Parish Council
Gladman Developments Ltd
Glisson Road/Tenison Road Area RA
Good Homes Alliance
Grantchester Parish Council
Graveley Parish Council
Great Abington Parish Council
Great and Little Chishill Parish Council
Great Shelford Parish Council
Great Wilbraham Parish Council
Greater Cambridge Partnerships
Green Heat
Grosvenor
Guest Road RA
Guilden Morden Parish Council
Hardwick Parish Council
Harlton Parish Council

Harston Parish Council
Haslingfield Parish Council
Hatley Parish Council
Hauxton Parish Council
Heatons
Heydon Parish Council
Highways Agency
Highworth Avenue CB
Hildersham Parish Council
Hinxton Parish Council
Histon & Impington Parish Councils
Horningsea Parish Council
Horseheath Parish Council
Historic England
Holemen Timber
Howes Percival LLP
Hunts DC
Hurst Park Estate RA
Husrt Park Estate RA
Hutchinsons Planning
Ickleton Parish Council
JK Design
King's Gate Cambridge
Kingston Parish Council
Knapwell Parish Council
Landbeach Parish Council
Linden Homes
Linton Parish Council
Litlington Parish Council
Little Abington Parish Council
Little Gransden Parish Council
Little Shelford Parish Council
Little Wilbraham and Six Mile Bottom Parish Council
Lolworth Parish Council
Longstanton Parish Council
Longstowe Parish Council
Madingley Parish Council
Melbourn Parish Council
Meldreth Parish Council
Milton Parish Council
M Scott Properties
Mulberry Close RA
National Association of Health Workers with Travellers
National Farmers Union
National Grid
Natural England
Newton Parish Council
Newnham Croft RA
North Newtown RA
North Cambridge Community Partnership
Oakington and Westwick Parish Council
Office of Rail Regulation

Old Chesterton RA
Orchard Park Community Council
Orwell Parish Council
Over Parish Council
Oxford Road RA
Palace Green Homes
Pampisford Parish Council
Papworth Everard Parish Council
Papworth St Agnes Parish Council
Pegasus Planning
Petersfield Mansions RA
Plan Surv
Quod
Rampton Parish Council
Residents Association of Old Newnham
Resolute Estates
Roe Buckland Land and Planning
Rok Planning
Romany Institute
Sandy Lane RA
Savills
Sawston Parish Council
Shepreth Parish Council
Shingay-cum-Wendy Parish Council
Shrimplin Brown
Shudy Camps Parish Council
Smithy Fen Residents Association
South Trumpington Parish Meeting
Sphere 25
SSA Planning
Stapleford Parish Council
Steeple Morden Parish Council
Stow-cum-Quy Parish Council
Strutt and Parker
Studio Partington
Sustain
Swavesey Parish Council
Sworders
Tadlow Parish Council
Teversham Parish Council
The Abbey Group
The Association of Independent Showmen (AIS)
The Pryer Consultancy
The Society of Independent Roundabout Proprietors
The Theatre Trust
The Traveller Law Reform Project
The Traveller Movement
Three
Thriplow Parish Council
Tibbalds

Toft Parish Council
Transitions Cambridge
Trumpington RA
Tulley Bunting
Turley Associates
Turley Associates
UK Green Building Council
UK Power Networks
Victoria Park Residents Working Group
Virgin Media
Waterbeach Parish Council
West Wickham Parish Council
West Wrating Parish Council
Weston Colville Parish Council
Whaddon Parish Council
Whippet Coaches Limited
Whittlesford Parish Council
Willingham Parish Council
Wimpole Parish Council
Windsor Road RA