

## CHAPTER 6: CLIMATE CHANGE

QUESTION NO.	SUMMARY OF REPS
<p><b>QUESTION 17: Mitigation and Adaptation to Climate Change</b></p> <p>Have the right issues for addressing climate change mitigation and adaptation been identified?</p> <p>Support: 42 Object: 2 Comment: 15</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support issues identified but achieving reduction in car use is best addressed by locating new development on the fringe of Cambridge or close to rapid transport routes.</li> <li>• Developments should only be allowed if they provide good quality energy efficient homes.</li> <li>• Supported by Cambourne, Comberton, Cottenham, Foxton, Litlington, Little Abington, Over, Pampisford, Steeple Morden, Swavesey and Weston Colville Parish Councils, Cottenham Village Design Group and the Environment Agency.</li> <li>• Agree with promotion of sustainable energy such as wind turbines and encouraging better broadband, improved public transport and increased food growing are sensible ideas.</li> <li>• Croydon Parish Council: it is important to consider climate change, but this should not require ridiculous, unproven or expensive schemes to be implemented. When considering the density of new developments, account must be taken of the use of open space and vegetation for shading, cooling and detaining surface water run-off.</li> <li>• In the next 10 years, energy efficiency and getting people to leave their cars at home are more important than the other issues listed.</li> <li>• Most of the issues are fine, seeking a reduction in car use is unlikely to be realistic – cars are important to people. Manufacturers should come up with more energy efficient cars.</li> <li>• Gamlingay Environmental Action Group: the issues identified are correct, but in a largely rural area it is surprising that there is no mention of encouraging sustainable agriculture.</li> <li>• Great Abington Parish Council: support, but feel it would be helpful to specify 'superfast broadband' as for homeworkers broadband speed is important and many areas have insufficient speeds.</li> <li>• Great Shelford Parish Council: support, but developers are reluctant to exceed minimum requirements because there are no marketable rewards.</li> <li>• Hauxton Parish Council: support, but suggest good broadband speeds are needed in the villages, recycling measures need to be practical, and recycling centres should be located in centres of population.</li> </ul>

	<ul style="list-style-type: none"> <li>• Rampton Parish Council: support, but there is a wide variation in applicability and benefit – investment and returns need to be considered with a long term view.</li> <li>• Support, but care should be taken to make sure the Local Plan is flexible enough to allow for technological advances in the next 20 years.</li> <li>• Support, but also need to consider building orientation to allow solar generation on roofs and to avoid overshadowing.</li> <li>• Support, but it is unrealistic to expect a reduction in car use, no flood risk is acceptable, and need a greater focus on affordable methods of energy production and use e.g. heat exchangers, insulation and heat recovery ventilation systems.</li> <li>• Support the majority of issues identified but consider that energy efficiency and water use is adequately covered by building regulations.</li> <li>• Whaddon Parish Council: support, but consideration needs to be given to how these issues might be implemented within small villages, especially issues such as transport and broadband provision.</li> <li>• Support, but there is serious conflict between trying to meet the need for new housing and providing for economic development and the need to mitigate and adapt to the likely effects of climate change.</li> <li>• Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</li> <li>• Ability to keep buildings cool in the summer is likely to become more important.</li> <li>• Support, but there should be far more commitment to approving applications for renewable energy installations.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• The ‘promotion of sustainable forms of transport and the reduction in car use’ should not apply to rural areas and permission should not be refused in rural areas on the basis that the proposal does not achieve this criteria. It is not sustainable to connect rural communities with public transport frequent enough to sustain them as well as address wider environmental objectives – such a proposal would burden local road networks and increase journey times.</li> <li>• The mitigation measures suggested typically favour</li> </ul>
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	<p>large developments.</p> <ul style="list-style-type: none"> <li>• The issues should be separated out as energy efficiency is a totally separate issue to rainfall, drainage, etc.</li> <li>• Broadband will not seek to reduce transport requirements because of the anti-social effects of home working.</li> <li>• Development in any area of known flood risk is unacceptable.</li> <li>• Only succeed in reducing emissions from transport if you move employment away from places such as South Cambridgeshire where there are insufficient houses to places where there are existing unwanted houses e.g. large conurbations in the Midlands and North-West and the only financially sustainable way of doing this is to allow house prices to rise in the places where there are insufficient houses.</li> <li>• Transport will always be an issue while cycling is not safe in the City. Need to separate cars and cycles.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Fen Ditton Parish Council: the issues listed need elaboration.</li> <li>• Broadly support, but written in sufficiently vague terms that it is difficult to be clear.</li> <li>• Conservators of the River Cam: there is every chance that before 2031 there could be rapid climate cooling, therefore the Local Plan needs to consider extremes in both directions.</li> <li>• Care should be taken when considering issues of layout, orientation, design and materials to minimise overheating. More focus should be given to taking advantage of solar gain to reduce the demand for electricity and gas for heating, as overheating is only a consideration for limited periods of each year.</li> <li>• Whilst mitigating climate change, measures that do not put any additional financial strain on the households budget should be promoted.</li> <li>• Wildlife Trust: the creation of a larger and better linked habitat network is also a critical element of climate change adaptation and should formally be recognised in a policy.</li> <li>• Hauxton Parish Council: need to specify what an acceptable level of flood risk is.</li> <li>• Travel for Work Partnership: importance of sustainable travel in making the district a great place to live and work should be emphasised and services such as the Busway, CamShare.co.uk, cycle routes, travel discounts and tools available from Travel for Work should be promoted. [LATE REP]</li> </ul>
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	<ul style="list-style-type: none"> <li>• Climate change is something of a bandwagon and should not be given undue weight. Sensible provisions are fine but be careful of something that only has limited scientific backing.</li> <li>• Extreme weather events may be more frequent including high wind.</li> </ul>
<b>QUESTION 18: Renewable and Low Carbon Energy Developments</b>	
<p>Question 18A: What approach do you think the Local Plan should take for the generation of renewable and low carbon energy?</p> <p>i. Include a criteria based policy seeking to maximise the generation of renewable and low carbon energy in the district and identifying the issues that would need to be addressed, and this would leave developers to make applications for their preferred areas.</p> <p>Support: 18 Object: 1 Comment: 5</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Gamlingay Community Turbine: Support, as there is no reason why wind farms cannot be considered on a case by case basis against the list of criteria. A minimum separation distance would be too restrictive and to refuse planning permission for a wind turbine, simply because it is a wind turbine, which this proposal implies, would be unacceptable.</li> <li>• Support, but the criteria should not be so onerous that the development of renewables is curtailed.</li> <li>• Supported by Cottenham, Haslingfield and Weston Colville Parish Councils.</li> <li>• Gallagher Estates: support the use of a criteria based policy as it is not appropriate to specifically require a separation distance of 2km. In assessing wind turbines and wind farms, separation distance should be a function of the site and its surroundings and the scale of the turbine(s).</li> <li>• Gamlingay Environmental Action Group: support, it is right to maximise renewable energy generation (including from wind) and the decision on where to locate wind turbines should be assessed on a case by case basis taking account of need, setting, the potential for disturbance, and local opinion, as well as the serious issues of climate change and energy security. A 2km limit is arbitrary and would exclude much of the district from contributing to the legal requirements to generate renewable energy.</li> <li>• Wind farm development should be considered on a case by case basis.</li> <li>• Criteria should take account of prevailing wind direction, type of landscape and other prominent local features.</li> <li>• SCDC should do much more to support renewable energy generation and ensure development is as sustainable as possible.</li> <li>• Rampton Parish Council: support as this does not need to mean poorly planned developments.</li> <li>• RenewableUK: support – this is the best approach. The policy and criteria should clearly identify the benefits as well as matters that need to be addressed in terms of potential effects. As currently</li> </ul>

	<p>written the policy is negatively written. [LATE REP]</p> <ul style="list-style-type: none"> <li>• RWE npower renewables: support as a criteria based policy will allow developments to be proposed in suitable and appropriate areas taking into account all constraints and balancing any significant effects against the need for renewable energy, as required by national and regional policy.</li> <li>• Climate change is a major challenge and there must not be artificial restrictions limiting wind farm developments. A 2km restriction is not justified.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• It is up to the local residents to state the preferred areas not the developers.</li> <li>• A separation distance of 2km is not far enough.</li> <li>• Wind farms are not green – there are far better ways to protect the environment that are not noisy, destructive, detrimental to health and don't have such a huge carbon footprint.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• A distinction between 2 or more turbines and single turbines does not make sense, as one large turbine could have a bigger impact than a number of smaller turbines.</li> <li>• Cambridgeshire County Council: suggest the identification of appropriate broad locations for alternative energy generation e.g. solar, biomass combined heat and power (CHP) and anaerobic digestion.</li> <li>• Croydon Parish Council: anything to reduce the carbon footprint is good, except the erection of wind farms which are inefficient, a blot on the landscape and give taxpayers money to the companies who provide them.</li> <li>• Support policies to actively support delivery of renewables and a criteria based policy would help clarify for the applicant the issues for discussion. A 2km separation distance is greater than is identified as necessary for noise impacts and therefore perhaps this criteria is pandering to the anti's rather than dealing with the impact of development which is what a policy should do.</li> </ul>
<p>Question 18A: What approach do you think the Local Plan should take for the generation of renewable and low carbon energy?</p> <p>ii. Include a criteria based policy as set out in option i, but specifically requiring a</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Bourn Parish Council: the current policy is working ok.</li> <li>• Support, but an additional criteria should be added to prevent the urbanisation of the countryside – requiring the replacement of the equivalent number of electricity pylons with underground cables e.g. a development of 20 wind turbines should only be allowed if 20 electricity pylons are removed.</li> <li>• Supported by Cambourne, Comberton, Cottenham,</li> </ul>

separation distance of 2km between a proposed wind farm (2 or more wind turbines) and any residential property, to protect residents from disturbance and visual impact. If the applicant can prove this is not the case a shorter distance will be considered.

Support: 19  
 Object: 9  
 Comment: 4

Foxton, Litlington, Little Abington, Oakington & Westwick, Over and Papworth Everard Parish Councils.

- Graveley Parish Council: strongly support, Graveley has a wind farm being built 600m from homes and businesses with no guarantee that there will not be noise nuisance and already aware that house prices are being affected.
- Great Abington Parish Council: support, but believe that the requirement should apply to single turbines as well as 2 or more turbines.
- Steeple Morden Parish Council: support, all communities need to contribute to energy generation from renewable and low carbon energy sources, however this needs to be balanced with the potential adverse impacts on the landscape and to local residents. As insufficient evidence exists on the long term health impacts of living close to wind farms, the Council should insist on a 2km separation distance.
- Support the separation distance but not the get out clause 'if the applicant can prove this is not the case a shorter distance will be considered'. It should be up to the resident(s) to agree any reduction, not for the applicant to make claims which cannot be absolutely proven until after the wind farm has been built.

**OBJECTIONS:**

- Object as a blanket 2km separation rule is too tough, however a requirement for 2km separation from any major settlement would be better.
- Engena Limited (renewable energy consultancy): object as no scientific or justifiable basis to implement a separation distance, and the distance is arbitrary – not related to landscape designations and landforms. The UK government has rejected the idea and there is no minimum separation distance in English planning law or guidance. A restriction would significantly constrain potential land.
- Gallagher Estates: object, it is not appropriate to specifically require a separation distance of 2km. In assessing wind turbines and wind farms, separation distance should be a function of the site and its surroundings and the scale of the turbine(s).
- Gamlingay Environmental Action Group: object, the decision on where to locate wind turbines should be assessed on a case by case basis taking account of need, setting, the potential for disturbance, and local opinion, as well as the serious issues of climate change and energy security. A 2km limit is arbitrary and would exclude

	<p>much of the district from contributing to the legal requirements to generate renewable energy.</p> <ul style="list-style-type: none"> <li>• Object as 2km is too large a distance to have as a standard.</li> <li>• Object as this is not practical and would probably exclude most (if not all) sites.</li> <li>• RenewableUK: object – blanket separation distances should not be imposed as this is contrary to national policy and there is no minimum requirement in English planning law or guidance. Projects should be assessed on a case by case basis on their individual merits. [LATE REP]</li> <li>• RWE npower renewables: object, a restrictive separation distance does not allow for the effects of development to be considered on a case by case basis, does not positively promote renewable energy, is contrary to national policy, and there is no evidence to support it. Applications for renewable energy technologies should be approved if any impacts are acceptable and also any adverse impacts can be balanced against the need for renewable energy.</li> <li>• Object as complete nonsense – a 2km exclusion zone means that no turbines will be delivered in the whole of South Cambs. The Council should be working with communities to promote the benefits of wind power not supporting NIMBY attitudes.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Croydon Parish Council: a much greater distance should be included.</li> <li>• Will be difficult to achieve and could require a lot of effort to prove.</li> </ul>
<p>Question 18A: What approach do you think the Local Plan should take for the generation of renewable and low carbon energy?</p> <p>Please provide any comments.</p> <p>Support: 0 Object: 2 Comment: 9</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• The Wildlife Trust: SCDC should adopt a criteria based approach backed by a Supplementary Planning Document to target renewable energy developments (particularly wind turbines) to appropriate areas, while allowing for the protection and enhancement of the natural environment including major green infrastructure that could be susceptible to inappropriate wind farm developments.</li> <li>• Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</li> </ul>

	<p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Be cautious about supporting renewables.</li> <li>• No more wind farms should be built as they don't and won't contribute usefully to the undeniable need for renewable energy. They require thousands of tons of concrete, are a menace to wildlife and require high maintenance. There are other more effective answers to the renewable energy problem – why won't any responsible authority accept that?</li> <li>• Onshore wind farms are a grotesque intrusion into the landscape and industrialise the countryside. They might be acceptable if they produced more electricity and also more reliable electricity. No more should be allowed in South Cambs. Visually innocuous solar panels should be promoted.</li> <li>• Any wind turbine would have a detrimental effect on the surrounding areas as they are ugly blots on the landscape. Solar panels would not have such a detrimental impact on the landscape if placed in a field surrounded by hedges.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Cottenham Village Design Group: the Local Plan should promote the generation of renewable and low carbon energy. An important consideration of this is where it may be appropriate to consider wind power and this kind of development should be judged on its particular merits.</li> </ul>
<p>Question 18B: Should the Local Plan identify future growth areas and new settlements as potentially suitable locations for the inclusion of renewable or low carbon district heating systems?</p> <p>Support: 27 Object: 3 Comment: 9</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support, especially new settlements via higher requirements for insulation and solar panels.</li> <li>• Supported by Bourn, Cambourne, Croydon, Great Abington, Litlington, Little Abington, Oakington &amp; Westwick, Over, Rampton and Steeple Morden Parish Councils and Fulbourn Forum for Community Action.</li> <li>• Cambridge City Council Labour Group: support the use of biomass combined heat and power generation for new major sites.</li> <li>• Cambridgeshire County Council: support and suggest the identification of appropriate broad locations for alternative energy generation.</li> <li>• Cottenham Village Design Group: support but perhaps with an emphasis on commercial development such as retail and industrial where large roof areas would allow for extensive arrays of solar panels. However, this will need to be balanced against the possibility that investment would be reduced by having this as a condition.</li> <li>• Haslingfield Parish Council: support as every opportunity should be taken to increase the generation of renewable energy in the district.</li> </ul>

	<p>Schemes built into new developments should act as a catalyst for retrofitting in existing communities.</p> <ul style="list-style-type: none"> <li>• Everyone needs to support renewable energy opportunities.</li> <li>• Every reasonable opportunity to mitigate climate change should be taken.</li> <li>• Support as this is a rare opportunity to build in infrastructure from the start and all new settlements should be considered suitable for renewable energy and heat generation systems.</li> <li>• Support as in larger developments there is the required density to benefit from the installation of larger scale renewable energy systems but an appropriate minimum size of development should be defined.</li> <li>• Support – all new settlements should be considered as suitable for renewable energy and heat generation systems and all mid to large scale developments should be seriously considered for district heating systems.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object – the Local Plan should not identify these areas and reference to one specific type of energy infrastructure is unnecessary. As part of responding to requirements relating to reducing carbon emissions, energy efficiency and energy generation applicants would need to assess all likely and potential options.</li> <li>• RenewableUK: object, as in the majority of cases identifying broad locations has been unsuccessful and problematic. However, if this process is used: a clear methodology unpinned by evidence must be developed (with input from the renewable energy industry), criteria must be identified to assess energy developments inside these areas, there should be no presumption against energy developments outside these areas, and the duty to co-operate must be exercised. [LATE REP]</li> <li>• Weston Colville Parish Council: not sure this is practical in some areas.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Comberton Parish Council: maximum sustainability should be required and this is likely to include renewables. Any new development should be seen as a mechanism to deploy 'leading edge' development.</li> <li>• There are so many constraints on possible areas for growth and new settlements that to identify them as sites which may be suitable for renewable or low carbon district heating systems could inhibit development in the district altogether.</li> <li>• Examine the experience of district heating systems</li> </ul>
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	<p>in Europe before supporting them here.</p> <ul style="list-style-type: none"> <li>• District heating systems seem to have many problems and you have to build around a district heating system rather than install one in an estate. Something more flexible is desirable.</li> <li>• Engena Limited (<b>renewable energy consultancy</b>): the Local Plan should encourage all forms of sustainable development in line with national planning policy and to achieve this renewable energy technologies should be included in all scales of new development (wherever possible). The Local Plan should not limit renewable energy projects to only new settlements and future growth sites.</li> </ul>
<p>Question 18C: What type of renewable and low carbon energy sources should the Local Plan consider and at what scale?</p> <p>Support: 11 Object: 0 Comment: 30</p>	<p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Solar panels on individual dwellings, community and industrial buildings.</li> <li>• All possible options should be considered and the potential energy mix properly quantified in relation to demand.</li> <li>• Energy generation should not be considered separately to energy reduction plans.</li> <li>• All types should be considered but on an individual site specific basis and the scale will depend on the location. Wind power, solar panels, biomass, and ground and air source heating should all be encouraged.</li> <li>• Policies that identify specific technologies are not appropriate in a plan to 2031 as it cannot take account of new technologies or changes in the cost effectiveness of existing technologies.</li> <li>• Maximum sustainability should be required and this is likely to include renewables. Any new development should be seen as a mechanism to deploy 'leading edge' development.</li> <li>• The latitude of the district makes the generation of significant amounts of electricity from solar energy very unlikely, wind speeds across the districts are not sufficient for the generation of significant amounts of electricity, and biomass, straw burning and geothermal systems could contribute some power. However it would be more constructive to require all buildings to be properly insulated and install efficient water and space heating systems.</li> <li>• Must be fit for purpose and not an eyesore within the development and/or on the surrounding countryside.</li> <li>• Should be cautious – if it's a good option it will be provided independently of SCDC requirements.</li> <li>• Solar power is more promising and it seems likely that a massive investment in this form of renewable energy (both public and private) is likely to be useful.</li> <li>• Cambridgeshire County Council: the Local Plan</li> </ul>

	<p>should identify appropriate broad locations for alternative energy generation including solar, biomass combined heat and power and / or anaerobic digestion. The scale needs to facilitate improved security of local energy supplies on a significantly bigger scale than previous plans.</p> <ul style="list-style-type: none"> <li>• Engena Limited (<b>renewable energy consultancy</b>): the Local Plan should consider all forms of renewable energy generation, at every scale and not at the exclusion of each other. Each site should be considered on a case by case basis on its own merits and in line with Government policy. It is not necessary for the Local Plan to comment on the appropriateness of any renewable energy technologies.</li> <li>• Foxton Parish Council: wind farms around Cambridge are inappropriate due to adverse impacts on the landscape; instead SCDC should consider subscribing to a national nuclear power scheme.</li> <li>• Given the urgency of climate change and the impending oil crisis, SCDC has responsibility to support all appropriate forms of renewable energy generation – no options should be excluded. SCDC has many more buildings that could support solar panels.</li> <li>• Additional support should be given to householders wishing to improve their insulation or energy efficiency. Emphasis should be on energy saving rather than production. Better insulation is the only real answer to reduce energy use. Insulating homes properly would have more effect than ugly, noisy, damaging wind farms.</li> <li>• Onshore wind farms are a grotesque intrusion into the landscape and industrialise the countryside. They might be acceptable if they produced more electricity and also more reliable electricity. No more should be allowed in South Cambs. Solar panels, waste straw power station(s) and domestic waste incinerator power station(s) should be promoted instead.</li> <li>• Straw should be used as there is a lot of it here. It is rarely used, but it is just returned to the soil as a waste product – why not consider a small local power station or do the economies not stack up?</li> <li>• Solar panels in fields with the scale dependent on the size of the village.</li> <li>• Locally produced energy should be encouraged but needs to be sustainable e.g. locally grown wood fuel.</li> <li>• Any technologies other than wind farms. Wind would not be an appropriate renewable energy source. Absolutely no more should be built in the district as they don't work except to make money</li> </ul>
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	<p>for the power companies.</p> <ul style="list-style-type: none"> <li>• Embrace energy conservation measures that do not hit the pocket of ordinary families and defer to Localism before deciding on the scope and range.</li> <li>• RenewableUK: given the urgent need for all areas of the UK to significantly increase their levels of renewable energy generation, the Local Plan should consider all renewable energy sources at all scales, taking account of any potential impacts and mitigation required. [LATE REP]</li> <li>• Developments should incorporate home power generation where possible, with stricter planning conditions.</li> <li>• The main options available in the district appear to be wind farms, solar panels and nuclear power – economic forces should be allowed to decide between these options as all are visually and environmentally acceptable to a level considerably higher than the low current use of wind farms and solar panels.</li> <li>• All types of renewable energy should be considered as equally valid and should be to a scale to deliver the maximum benefit.</li> <li>• All types as the district relies on importing the vast majority of the energy consumed and this is unfair and unreasonable.</li> <li>• Nuclear is probably impossible as insufficient reliability of water for cooling, but wind, sun and waste materials are available, acceptable and should be promoted.</li> <li>• The aesthetics of wind turbines is debatable but the need to move away from reliance on fossil fuels is urgent. The ideal would be for no development to take place unless energy generation sufficient to meet the need of the development is incorporated.</li> <li>• Wind and solar power can make material contributions, but need to be considered in depth before being included in the Local Plan.</li> <li>• Much of the district may not be appropriate for wind power and therefore it would be useful to identify broad locations of acceptability.</li> <li>• Fen Ditton Parish Council: land used for solar farms may be more useful for housing, but the same is not true for solar panels on roofs of houses, offices or agricultural buildings. Wind may be more effective if exploited outside the district.</li> <li>• The Local Plan should include a clear position statement on hydropower developments and this should be in line with Environment Agency policy and cause no deterioration in the ecological status of the river.</li> </ul>
<p><b>QUESTION 19: Renewables in New Developments</b></p>	

Question 19: To what extent should new development provide for onsite renewable energy generation?

i. All new developments should be required to provide onsite renewable energy? If so, should 10%, 15% or 20% equivalent provision be required?

Support: 33

Object: 1

Comment: 8

**ARGUMENTS IN SUPPORT:**

- Renewable energy options should be considered with all new development, but each option should be considered on its own merits and the impact on the surrounding homes etc should be taken into account.
- Support a 20% requirement.
- With present technology, a 10% requirement would be reasonable, but this should be reviewed regularly to take account of technological changes which might make higher targets achievable.
- Support as the cost of including renewable energy technologies in new builds is much lower than retrofitting existing properties and developers could even pass on this cost to the homeowner and still make a profit.
- Support with a 10% requirement as this recognises that in shaded and calm locations with limited access to ground or air heat sources then it could be difficult to achieve.
- A 20% requirement is supported by Cambourne, Pampisford and Rampton Parish Councils.
- Cambridgeshire County Council: support and a minimum of 10% seems acceptable if this is over and above the national zero carbon policy. The policy should require no more than 10% of a building's energy requirements to be provided from these technologies. However, site wide solutions could deliver more than 10%. Flexibility should be included in the policy to ensure new technologies are not precluded.
- Supported by Cottenham Parish Council.
- Cottenham Village Design Group: it seems appropriate to set a percentage for onsite generation and 10% seems reasonable. The design of such elements should be considered at an early stage, especially in conservation areas.
- Fulbourn Forum for Community Action: support a 15% requirement as the ease of achieving this will improve over the plan period as technology improves. The target should consider the long term.
- Support and each new dwelling with un-shaded south or east facing roofs should have at least 2 sqm of solar thermal panels and photovoltaic panels generating at least 2kw peak output. The need to provide the required orientation of new dwellings should be considered at the detailed planning stage.
- A 15% requirement is supported by Great Abington, Litlington, Little Abington and Steeple Morden Parish Councils.
- Haslingfield Parish Council: larger new developments should be required to be designed to

	<p>maximise solar energy generation potential and the required provision should be reviewed every five years so that it increases as technology improves.</p> <ul style="list-style-type: none"> <li>• Support and 10-20% requirement, based on the information that 10% is currently obtainable from solar technologies.</li> <li>• Support and developers should not be able to opt out of energy conservation as need to seek to maximise benefits for individual households.</li> <li>• A 10% requirement is supported by Over and Swavesey Parish Councils.</li> <li>• Pembroke College, Trinity College and Spicers Ltd (all represented by Bidwells): renewable energy is core to providing a sustainable development and green energy sources should be provided in line with the size of the development. Smaller developments will have physical constraints which reduce the potential for renewable energy generation.</li> <li>• Support and should require as much as possible. The more renewable energy generated the better. It is difficult to improve thermal efficiency of older properties therefore every effort should be made to obtain maximum efficiency in new builds.</li> <li>• Rampton Parish Council: ideally 20%, but varying the target could be linked to the potential use so buildings that use more energy should be expected to show higher percentage savings.</li> <li>• A requirement of 10% should be the baseline, with an aspiration to increase to 20% within the lifetime of the Local Plan.</li> <li>• A requirement of 10% seems to be generally accepted. More would be easily justifiable but viability must be considered and other requirements would be compromised.</li> <li>• Support and requirement should be 20% as a minimum; however 33% would be preferable.</li> <li>• Set requirement at 15% but aim for 20% or more as technology improves. Where south facing roofs are not available, aim to have south facing panels on communal land.</li> <li>• Wellcome Trust: based on the experiences of developments at Genome Campus, 15% should be required as a minimum. However, recognition should be given for site wide renewable energy strategies as this would enable the most effective measures to deliver carbon savings are used.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• University of Cambridge: policy should focus on carbon reduction rather than provision of on-site renewables. The level of carbon reduction for non-residential buildings should reflect changes in Building Regulations but any more rigorous targets</li> </ul>
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	<p>need to be subject to further consultation and incorporate a degree of flexibility.</p> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Smaller developments should not be exempt.</li> <li>• Cambourne Parish Council: consideration should be given to amending the requirement to be “onsite or adjacent to the site when the development abuts an existing settlement”.</li> <li>• Should encourage larger developments to generate 10% of their energy needs from renewables but do not make it a requirement. More sensible to insist on good insulation and that space heating and hot water are provided in the most efficient manner.</li> <li>• Consider the renewable energy options on a case by case basis e.g. consider heating of school and community buildings using burning of waste material or wood pellets, and small residential wind turbines are often considered to be unsatisfactory in terms of energy production.</li> </ul>
<p>Question 19: To what extent should new development provide for onsite renewable energy generation?</p> <p>ii. Small scale developments of less than 5 dwellings or less than 500 m2 of non-residential floorspace should be exempt?</p> <p>Support: 5 Object: 7 Comment: 3</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support but the definition of small scale should be increased to developments of at least 50-100 dwellings.</li> <li>• Supported by Weston Colville Parish Council.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object as should be one rule for everybody.</li> <li>• Gamlingay Environmental Action Group: object as there should be no exemptions.</li> <li>• Object as there should be no exemptions, feasible renewable and low carbon technologies exist for small developments.</li> <li>• Objected to by Haslingfield and Over Parish Councils.</li> <li>• Object as all properties must include renewable technologies otherwise developers will see an advantage in delivering multiple small scale developments.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• A lower target may be more appropriate on smaller developments but obvious options such as solar panels should be required.</li> <li>• An exemption should only be allowed if it can be proved that the provision of renewable energy is technically impossible. However, financial contributions could be sought so that the equivalent energy could be installed elsewhere e.g. on public buildings.</li> </ul>
<p>Question 19: To what</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p>

<p>extent should new development provide for onsite renewable energy generation?</p> <p>iii. No requirements for renewable energy generation should be made?</p> <p>Support: 11 Object: 8 Comment: 0</p>	<ul style="list-style-type: none"> <li>• Supported by Fen Ditton, Foxton and Papworth Everard Parish Councils.</li> <li>• Countryside Properties and Grosvenor / Wrenbridge (represented by Savills): the Government has already set out a challenging timetable for delivering zero carbon homes by 2016 through changes to building regulations; therefore the planning system does not need to deal with the issue. It is best left to developers to determine whether carbon savings should be tackled through improvements to the fabric of the building or through renewable energy generation.</li> <li>• Support, if it's a good bargain it will come forward without SCDC support and if it's a bad bargain SCDC should not be supporting it.</li> <li>• Support as only large developments (e.g. multiple halls of residence) should be required to provide renewable energy on site. Anything else gives renewable energy manufacturers an unfair way of extracting money from individuals.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object, this is not an option as market forces will mean that these newer technologies will not be used and another generation of housing stock will be fuel inefficient.</li> <li>• Gamlingay Environmental Action Group: the climate change and energy security crisis is so severe and so urgent that it must be a requirement that any new buildings generate the equivalent of 100% of their usage from renewable energy.</li> <li>• Objected to by Haslingfield and Hauxton Parish Councils.</li> <li>• Object as all new development should incorporate renewable energy generation or should be considered for renewable energy generation even if the outcome is that the site is not suitable. All developments have a moral obligation to tackle climate change.</li> <li>• Object as developers should be incentivised to include as much renewable power and heat as possible.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Balance between provision of renewables, cost effectiveness and subsidy required should not be enforced through the Local Plan.</li> </ul>
<p>Question 19: To what extent should new development provide for onsite renewable energy generation?</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• CEMEX (represented by Carter Jonas): supports renewable energy generation on site at a level appropriate to the development.</li> <li>• Croydon and Great Shelford Parish Councils: each development should be considered on an individual</li> </ul>

Please provide any comments.

Support: 0

Object: 1

Comment: 15

basis as it would be impossible to apply the same criteria to everyone.

- Cambridge South Consortium (represented by Bidwells): whilst it is accepted that there is a need for a policy, the Council should not be overly prescriptive as this will preclude innovative design and impede new solutions. An element of discretion and flexibility to deal with site specific circumstances should be built into any policy.
- Provision should not be required to achieve a specific percentage; instead it should be based on what is practical and viable.
- Difficult to see how the Council will quantify energy usage, therefore developers should be encouraged to include these technologies but it should not be mandatory. The requirement for sustainable design should drive the decision.
- Need to balance quality with achievability to produce the greatest possible contribution on each site.
- RenewableUK: given the need for all areas of the UK to increase their levels of renewable energy generation, the Local Plan should require as much onsite renewable energy to be provided as possible. [LATE REP]
- Wildlife Trust: new developments should be encouraged to provide maximum feasible contribution of renewable energy generation.
- SCDC Liberal Democrat Group: there is a gap between the start of the Local Plan and the change to zero carbon through Building Regulations, therefore the Local Plan needs to include requirements for renewables on new homes. 10% seems to be universally promoted and all new dwellings should be Code for Sustainable Homes Level 4 or above.
- Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]

**OBJECTIONS:**

- Harrow Estates (represented by Pegasus Planning): there should not be a blanket policy as renewable energy sources are not the most efficient methods, instead the focus should be on reducing carbon through inclusion of carbon reduction measures designed into the scheme.

	<p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Comberton Parish Council: all new developments should be required to provide onsite renewable energy but the issue is not just renewable but about high efficiency throughout the housing lifecycle.</li> <li>• There should be more passive solar heating and rainwater harvesting included in new developments.</li> <li>• Micro-generation on individual properties is possible through a variety of means but adds to the cost of the development. Building regulations are already steadily increasing energy efficiency requirements and therefore implementation costs are already increasing. Changes to Building Regulations are quicker than changes to strategy brought in by the Local Plan, so is the Local Plan agile enough to deal with this issue?</li> <li>• Wind farms are noisy, destructive, detrimental to health, have a huge carbon footprint and provide pitifully low levels of electricity. The environment would be better protected by improving insulation and installing solar panels.</li> </ul>
<p><b>QUESTION 20: Community Energy Fund</b></p>	
<p>Question 20A: Should the Local Plan enable the setting up of a Community Energy Fund that would allow developers to invest in offsite energy efficiency and renewable and low carbon energy projects to meet their carbon reduction targets?</p> <p>Support: 24 Object: 15 Comment: 14</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Gamlingay Community Turbine: support and it would be a good idea for SCDC to publish criteria for defining community renewable energy projects.</li> <li>• Supported by Cambourne, Cottenham, Litlington, Oakington &amp; Westwick, Over, Papworth Everard, Rampton, Steeple Morden and Weston Colville Parish Councils and Cambridgeshire County Council.</li> <li>• CEMEX (represented by Carter Jonas): support the principle, with the appropriate level of contributions to be determined for each project.</li> <li>• University of Cambridge: support as the option to offset carbon reduction offsite is worthy of further consideration, but suggest this is dealt with as part of any policy developed to secure carbon reduction to avoid proliferation of policies.</li> <li>• Croydon Parish Council: sounds a wonderful idea but how do you know if your house is zero carbon?</li> <li>• Haslingfield Parish Council: support, a fund should be set up but primarily for renewable and low carbon generation projects. Maximum efficiency should be built into all new developments.</li> <li>• Support particularly where economies of scale could mean a higher proportion than 10-20% could be achieved by delivering offsite.</li> <li>• Support as long as the fund is local and can be</li> </ul>

	<p>used as an educational tool to inspire and educate the next generation.</p> <ul style="list-style-type: none"> <li>• A community energy fund is a good idea but it should not be an investment; instead it should be a disincentive for development and should exist not for profit but for community benefit.</li> <li>• Support but it should be a choice for the developer.</li> <li>• Support as this proposal sounds reasonable as providing energy solutions locally is not always the most efficient way.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object as the danger is that developers would continue to build housing with inadequate energy standards justified by offsets in other places.</li> <li>• Object as this would favour larger developments that have a greater impact on the environment.</li> <li>• Fen Ditton Parish Council: object as why should developers and not the energy suppliers bear the cost.</li> <li>• Object as too much is being expected from developers already and the need for additional housing is too great to inflict further impositions. If the establishment of an energy fund is considered to be essential, contributions should be made by Council Tax payers.</li> <li>• Countryside Properties and Grosvenor / Wrenbridge (represented by Savills): object as it is unclear how such a mechanism would work except through s106 agreements and after April 2014 such pooling of monies will not accord with the Community Infrastructure Levy Regulations.</li> <li>• Foxton Parish Council: object as this would just encourage developers to avoid their obligations for carbon neutral and green projects.</li> <li>• Objected to by Great Abington and Little Abington Parish Councils.</li> <li>• Great Shelford Parish Council: object as it would be too easy to displace the costs elsewhere. How would it be managed?</li> <li>• RenewableUK: object as community benefits are not a planning matter and therefore sit outside the planning system. Community funds are voluntary and are not part of the decision making process for planning permission – developers could set up community funds on top of s106 contributions. [LATE REP]</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Comberton Parish Council: possibly, developers should be encouraged to propose different ways of meeting the high level targets for sustainability. The Local Plan should not select the specific solutions (that should be left to developers or</li> </ul>
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	<p>experts in this matter) and SCDC should seek expert advice to set targets at leading edge levels to ensure developers have to make the best effort possible.</p> <ul style="list-style-type: none"> <li>• Cottenham Village Design Group: a community energy fund might be a more appropriate way to deal with onsite renewable energy generation in conservation areas or on sites adjacent to heritage assets.</li> <li>• Examine this idea carefully before accepting it. Only be acceptable if there was a clear linkage to and benefit to be gained by the development from the offsite provision.</li> <li>• Gamlingay Environmental Action Group: this is an interesting idea that merits further detailed investigation, but without seeing the detail it is impossible to tell if it will have a positive effect.</li> <li>• Grantchester Parish Council: the explanation is not clear as to what is proposed and who would fund it. If the proposal is that SCDC should fund developers to meet the zero carbon requirements, we would oppose it. If the proposal is that developers would 100% fund local projects in order to achieve their zero carbon requirements, we would support it.</li> <li>• Should strive for energy efficiency and use of renewable and low carbon energy to be onsite. Exemption only if it can be proved that provision of renewable energy is technically impossible.</li> <li>• Should only be used in exceptional circumstances as renewable energy should be directly linked to the homes themselves as this drives behaviour change.</li> <li>• Wellcome Trust (represented by Porta Planning): the merits of this approach are recognised but contributions should only be sought where there is an impact on a community e.g. biomass plants and wind turbines physically impact on a community and therefore they should contribute to a community energy fund, whereas many renewable energy measures can be implemented with the only impact being on the buildings they serve.</li> <li>• Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</li> </ul>
<p>Question 20B: Are there other alternatives?</p>	<p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Cambourne Parish Council: there should be an</li> </ul>

<p>Support: 0 Object: 0 Comment: 11</p>	<p>option for a more local energy fund based on the Cambourne Parish Energy Fund model rather than a county wide fund, if the local Parish Council wishes to exercise this option.</p> <ul style="list-style-type: none"> <li>• Comberton Parish Council: developers should be encouraged to propose different ways of meeting the high level targets for sustainability. The Local Plan should not select the specific solutions (that should be left to developers or experts in this matter) and SCDC should seek expert advice to set targets at leading edge levels to ensure developers have to make the best effort possible.</li> <li>• The revisions to Building Regulations already have a major impact.</li> <li>• Great Abington and Little Abington Parish Councils: energy efficiency efforts should have an onsite impact.</li> <li>• The Cambourne method seems to work, but the percentage may need reviewing upwards.</li> <li>• How about developing a consortium of local authorities to pool resources and buy offsite projects?</li> <li>• Suggest all developers and local authorities should contribute to a scheme for harnessing tidal force energy production off the coast of East Anglia.</li> <li>• Exemption only if it can be proved that provision of renewable energy is technically impossible.</li> <li>• Developers should be made to contribute funds to a central fund to compensate residents, commuters, and the travelling public etc. for the inconvenience caused during the building of energy saving projects.</li> </ul>
<p><b>QUESTION 21: What sustainable building standards should be required in new developments?</b></p>	
<p>i. Developments would only have to comply with Building regulations requirements for energy efficiency.</p> <p>Support: 9 Object: 6 Comment: 4</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Countryside Properties and Grosvenor / Wrenbridge (represented by Savills): this policy would serve little purpose in the Local Plan as adoption in October 2015 is only just before the requirements for Level 5 come into place in 2016. The planning system already presents many obstacles to delivering homes, duplicating provisions required elsewhere is unnecessary.</li> <li>• Croydon Parish Council: the associated costs are prohibitive – people cannot afford homes now.</li> <li>• Sustainable buildings standards should be dictated by national policy and applied nationally. Introducing standards at local levels can have a significant impact on local development costs, which may direct development to other areas and</li> </ul>

	<p>prevent local growth.</p> <ul style="list-style-type: none"> <li>• Supported by Foxton and Weston Colville Parish Councils.</li> <li>• Support as requirements in excess of building regulations (at the time of the development) would be unreasonable.</li> <li>• Building Regulations deal with this issue and no additional policy is required.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object – developments should have to achieve the highest possible standard as we only have one chance to build them.</li> <li>• Environment Agency: object as the district is located in an area of water stress, and therefore higher standards should be sought.</li> <li>• Object as highest standards should apply as this is a good long term investment.</li> <li>• Haslingfield Parish Council: object as insisting on high levels of insulation in all new development would make a huge difference to energy consumption and reduce fuel poverty in the future.</li> <li>• Object as homes should be required to exceed Building Regulations by a significant amount and reduced energy bills will help those on low incomes. The cost of installing renewable technologies will go down as the market for them increases and it is cheaper to install them in new builds than through retrofitting.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Do not accept the figures given on the additional costs of higher standards. If it becomes a general requirement to build all new homes to Level 4, the additional cost will surely come down.</li> <li>• Cottenham Village Design Group: high quality design is appropriate but with the continuing improvements of building regulations it is questionable whether there should be a requirement for dwellings to be designed above this – this is especially relevant further into the Local Plan lifetime.</li> </ul>
<p>ii. All new buildings would comply with sustainable building standards. If so, should all new dwellings meet at least Code for Sustainable Homes Level 4, and all non-residential schemes meet at least the BREEAM ‘very good’ standard?</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Supported by Cambourne, Cottenham, Grantchester, Great Abington, Great Shelford, Histon &amp; Impington, Litlington, Little Abington, Over and Steeple Morden Parish Councils and Cambridgeshire County Council.</li> <li>• The issue of whole life costing should be introduced to help inform building standards.</li> <li>• Environment Agency: a policy should be developed to specify the requirement for a combination of options ii and iii. The requirement for higher</li> </ul>

Support: 25  
Object: 3  
Comment: 2

environmental standards will improve the district's resiliency to climate change and reduce the environmental impact of the development.

- The highest standards should apply as this is a good long term investment.
- Support as it is less costly to construct new housing to sustainable standards than to retrofit buildings later.
- Haslingfield Parish Council: support as insisting on high levels of insulation in all new development would make a huge difference to energy consumption and reduce fuel poverty in the future.
- Hauxton Parish Council: housing in South Cambs should be of a good quality and of sustainable construction.
- All new buildings should comply with an agreed sustainable building standard (level 4 or above) and on a mixed tenure site all buildings should be to the same standard.
- Green businesses should also be encouraged.
- There is no excuse not to make all homes as energy and water efficient as is economically possible.
- Pembroke College, Trinity College and Spicers Ltd (represented by Bidwells): support and there should be an aspiration for residential development to meet Level 4. Size and viability would need to be considered and flexibility should be built into the policy to allow a percentage of each development to meet a specific level.
- Rampton Parish Council: support as the extra cost is relatively small when compared to the total cost of the house.
- Support in combination with a percentage of zero carbon dwellings within developments.
- Support and developments that are not sustainable in other ways (i.e. no non-car transport options) should have an even higher standard.
- Comberton Parish Council: option ii should be complied with until overtaken by Building Regulations.

**OBJECTIONS:**

- Object, Level 5 should be required now for everything.
- Object as we should be aiming for Level 6 as soon as possible.

**COMMENTS:**

- University of Cambridge: for non-residential development, the University's policy is to carry out BREEAM assessments on all new buildings over 1000 sqm with a target of achieving a rating of 'excellent' and a minimum of 'very good' in cases

	<p>where there are explicit reasons why ‘excellent’ cannot be achieved. There is no appropriate BREEAM for existing buildings so we would be concerned if the policy was prescribed for all developments.</p>
<p>iii. The zero carbon standard (Code for Sustainable Homes Level 5) would be required in larger scale developments?</p> <p>Support: 14 Object: 4 Comment: 1</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support as despite the extra cost the target should be Level 6 as this is likely to lead to overall savings in the long term that are not apparent in the initial outlay.</li> <li>• Support but should not just apply to the large developments, instead should apply to all developments.</li> <li>• Supported by Cambourne, Great Abington, Great Shelford, Little Abington, Oakington &amp; Westwick, and Papworth Everard Parish Councils and Cambridgeshire County Council.</li> <li>• Cambridge City Council: support the approach in principle where there are opportunities provided by the development that are not offered on smaller developments e.g. if the scale of development and mix of uses make combined heat and power and district heating viable, this would make Level 5 possible. This approach should be developed as part of a policy to ensure that opportunities are not missed.</li> <li>• Environment Agency: a policy should be developed to specify the requirement for a combination of options ii and iii. The requirement for higher environmental standards will improve the district’s resiliency to climate change and reduce the environmental impact of the development.</li> <li>• The highest standards should apply as this is a good long term investment.</li> <li>• Haslingfield Parish Council: support as the zero carbon standard is due to be introduced in the near future for all developments so it makes sense to require it now on large developments so that these are not sub-standard in a few years.</li> <li>• Support as this is clearly possible and desirable. A lack of ambition and complacency among some developers needs to be challenged to change the culture towards zero carbon developments.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object as the size of the development is not relevant. All new homes should be built to standards that save energy and minimise impact on the environment.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Yes be green but we can’t force up the price of houses to pay for measures that are uneconomic.</li> </ul>

<p>Please provide any comments.</p> <p>Support: 0 Object: 1 Comment: 15</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Comberton Parish Council: developers should be encouraged to propose different ways of meeting the high level targets for sustainability. The Local Plan should not select the specific solutions (that should be left to developers or experts in this matter) and SCDC should seek expert advice to set targets at leading edge levels to ensure developers have to make the best effort possible.</li> <li>• Gamlingay Environmental Action Group: the Council must support and enforce the highest standards available – currently Level 5 and then Level 6 as soon as possible. Developers will always try to build to lower, cheaper standards.</li> <li>• Middle Level Commissioners: a degree of caution is required, particularly given the financial climate; therefore it may be best to have a standard for certain developments, e.g. higher standards for larger developments and lower standards for smaller developments. External funding is likely to be required. To be fully accepted this policy would need to be endorsed by senior Members but they are unlikely to do this if it restricts development.</li> <li>• Highest standards should be aspirational and only compromised in exceptional circumstances, but must take account of practical consideration.</li> <li>• Wildlife Trust: the Council should require the maximum standards feasible at all developments. If a development can remain viable with the highest standards, why not require them? Lower standards should only be accepted if it can be proven that development will not proceed with the highest requirements.</li> <li>• Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Cambridge City Council: no reference is made to the possibility of seeking consequential improvements to existing dwelling's energy efficiency. Consideration should be given to developing a policy (similar to Uttlesford District Council) to be applied to extensions and loft conversions requiring the implementation of cost effective measures to improve the whole property's energy efficiency.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Sustainable design and construction standards in excess of current Building Regulations (at the time of development) would be unreasonable. Building Regulations are regularly updated in consultation with the construction industry and planning policy should not duplicate these or seek enhancements.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• No need for specific policy as it will be rapidly overtaken by national requirements. Option ii will already be in force by the time this Local Plan is likely to be adopted and option iii will be in place by the time most major developments identified in the Local Plan are being built.</li> <li>• Countryside Restoration Trust: this is an opportunity to further the local green economy and is vital to creating a sustainable future for all. New buildings should be either zero or minimal carbon.</li> <li>• Imposing high standards will translate into additional building costs, which will be passed onto the consumer, and these costs are still unreasonably high. All new dwellings should be Level 3 with a small proportion on larger developments achieving Level 4.</li> <li>• Building Regulations are changing and so new developments will need to meet increased national standards.</li> <li>• Milton Parish Council: suggest a new policy to exempt from planning permission small changes that enhance energy efficiency (some may already be permitted development).</li> <li>• Higher standards of energy efficiency, water use and disposal, waste disposal and use of low carbon technologies would lead to less speculative developments.</li> </ul>
<p><b>QUESTION 22: What approach to sustainable show homes should we take?</b></p>	
<p>i. Rely on negotiating their provision on an individual site basis?</p> <p>Support: 10 Object: 4 Comment: 0</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• CEMEX (represented by Carter Jonas): this could be an unreasonable burden on development and should be left to homeowners to decide.</li> <li>• Supported by Fen Ditton, Over and Steeple Morden Parish Councils.</li> <li>• Support as this will provide greater flexibility for house builders and developers to respond according to their own particular site circumstances and marketing preferences.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object as it is better to have one rule and then allow exceptions, than to have to negotiate each</li> </ul>

	<p>time.</p> <ul style="list-style-type: none"> <li>• Haslingfield Parish Council: object as everything should be done to ensure that new properties are as sustainable as possible. Sustainable show homes will not stop developers building but will encourage the uptake of environmentally friendly technology.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Do not see the point of this policy as if buildings are built to the relevant Building Regulations standards then they should be included on the show homes to. This policy would be superfluous.</li> </ul>
<p>ii. Require all developments that include a show home to provide a sustainable show home?</p> <p>Support: 17 Object: 2 Comment: 3</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Supported by Cambourne, Cottenham, Croydon, Histon &amp; Impington and Rampton Parish Councils.</li> <li>• Gamlingay Environmental Action Group: support as this is a sensible approach and people who are informed of green options will often choose them.</li> <li>• Haslingfield Parish Council: support as everything should be done to ensure that new properties are as sustainable as possible. Sustainable show homes will not stop developers building but will encourage the uptake of environmentally friendly technology.</li> <li>• Support as the culture among some developers need changing and planning policy needs to reflect this.</li> <li>• It will reinforce the overall aims relating to sustainable homes, is good promotion and will encourage ownership of this type of property or to purchase some of the extras.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object as this is the minimum, all new homes should be sustainable.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Providing one sustainable show home would mean that resources would be spent on this property, it would be fairer to distribute the sustainable features more widely across a development.</li> <li>• Do not see the point of this policy as if buildings are built to the relevant Building Regulations standards then they should be included on the show homes to. This policy would be superfluous.</li> </ul>
<p>iii. Require developments of over 15 dwellings to provide a sustainable show home?</p> <p>Support: 14</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support but the sustainable show home should be typical of the actual development i.e. the development itself should be sustainable overall.</li> <li>• Every development that has a show home can afford this so they should be required to do it.</li> </ul>

<p>Object: 1 Comment: 6</p>	<ul style="list-style-type: none"> <li>• Support and somebody will want to buy the low energy show home so the developer will not lose out.</li> <li>• Supported by Great Abington, Hauxton, Little Abington, Oakington &amp; Westwick, Papworth Everard and Weston Colville Parish Councils.</li> <li>• Haslingfield Parish Council: everything should be done to ensure that new properties are as sustainable as possible. Sustainable show homes will not stop developers building but will encourage the uptake of environmentally friendly technology.</li> <li>• Support but associated costs should be displayed – buyers need to be aware of the cost implications.</li> <li>• Support as if we are serious about energy efficiency, all show homes should be built to the best energy code for that period, irrespective of the size of development.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Fen Ditton Parish Council: this has some merit but need to build in ability to refer to best practice in other show homes.</li> <li>• Do not see the point of this policy as if buildings are built to the relevant Building Regulations standards then they should be included on the show homes to. This policy would be superfluous.</li> </ul>
<p>Please provide any comments.</p> <p>Support: 0 Object: 4 Comment: 3</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Cambridgeshire County Council: support developments providing a sustainable show home but this should include a whole life costing.</li> <li>• Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Countryside Properties and Grosvenor / Wrenbridge (represented by Savills): there is no need for the Local Plan to deal with this issue as Level 5 will be required from 2015.</li> <li>• Great Shelford Parish Council: these features shouldn't be add-ons, they should be provided anyway.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Comberton Parish Council: this is for the developers to decide as it is in their interests to market the developments. However, they should</li> </ul>

	<p>not be able to market their developments until they have met their commitments from s106s etc.</p> <ul style="list-style-type: none"> <li>• A show home demonstrating sustainable options should be made available to small scale developers.</li> <li>• Do not see the point of this policy as if buildings are built to the relevant Building Regulations standards then they should be included on the show homes to. This policy would be superfluous.</li> </ul>
<p><b>QUESTION 23: What approach should the Local Plan take to construction methods?</b></p>	
<p>i. Continue to include a construction methods policy?</p> <p>Support: 38 Object: 0 Comment: 2</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support as not all developers are considerate.</li> <li>• It is important to continue to include a requirement for sustainability at all stages of the construction process.</li> <li>• Supported by Cambourne, Cottenham, Foxton, Great Abington, Great Shelford, Litlington, Little Abington, Over, Pampisford, Papworth Everard, Rampton, Steeple Morden and Weston Colville Parish Councils.</li> <li>• Cottenham Village Design Group: support as the construction of new additions to the built environment should not be detrimental to the existing.</li> <li>• Support as worthwhile now, so why would you discontinue it? This obliges contractors to consider the impact of developments.</li> <li>• Haslingfield Parish Council: support as reducing waste and minimising the impact on the surrounding areas are clearly desirable goals that should be required of developers.</li> <li>• Hauxton Parish Council: support and make it clear to developers the high standard expected in South Cambs.</li> <li>• Include as it's important to continue to protect neighbours to developments and make sure developers follow it. Without conditions builders will cause needless disruption and residents should be aware of the specific conditions contractors have to adhere to.</li> <li>• Support as if you don't specify what is required, how will anyone know what is required? A policy is needed to maintain consistency of approach.</li> <li>• Support as a policy which encourages sustainable methods of construction and sourcing of local sustainably produced and manufactured materials may be useful, but should not be too prescriptive as construction methods are likely to advance quicker than the timeframe of the Local Plan.</li> </ul>

<p>ii. Not specify construction methods in the Local Plan?</p> <p>Support: 6 Object: 3 Comment: 0</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>Cambridge South Consortium (represented by Bidwells): support as construction methods are primarily controlled through legislation and guidance outside the planning system, therefore they should not be dealt with as part of the planning process.</li> <li>Fen Ditton Parish Council: support but S62 noise consents should still be applied.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>Object as the Council should have a framework in place to ensure the impact on the existing neighbours is as small as possible.</li> <li>Haslingfield Parish Council: object as reducing waste and minimising the impact on the surrounding areas are clearly desirable goals that should be required of developers.</li> <li>Object as if you don't specify what is required, how will anyone know what is required?</li> </ul>
<p>Please provide any comments.</p> <p>Support: 0 Object: 1 Comment: 3</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>Construction methods are primarily controlled through legislation and guidance outside the planning system, therefore they should not be dealt with as part of the planning process.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>Comberton Parish Council: specifying specific methods is likely to constrain innovation, so unless there is a pressing issue construction methods should only be constrained by high level functional requirements on sustainability, environmental issues and neighbourhood issues e.g. noise, light etc.</li> <li>Need to ensure that any new original methods can be adopted as appropriate.</li> <li>Construction methods are likely to advance quicker than the timeframe of the Local Plan, therefore any policy should not be too prescriptive.</li> </ul>

<p><b>QUESTION 24: What approach should the Local Plan take on water efficiency in new housing development? What are your views on the following options?</b></p>	
<p>i. Rely on Building Regulations standards to reduce water use below the average existing levels.</p> <p>Support: 5 Object: 5 Comment: 2</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Supported by Foxton Parish Council.</li> <li>• Building regulations are regularly being updated and reflect what is practical and viable for developers and housebuilders. Such matters should be handled by regulation and not duplicated by policy.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object as if you ask for the minimum, you will get the minimum. Building Regulations are the bare minimum.</li> <li>• Cambridge Water: object as Building Regulations water efficiency standards are a bare minimum and in the context of development in an area of water stress, higher standards should be aimed for. It is more cost efficient to design higher water efficiency into housing at the time of construction than to change things later, and achieving higher standards of water efficiency can be done at a reasonable initial cost.</li> <li>• Environment Agency: object as the district is located in an area of water stress, and therefore higher standards should be sought. Whilst it has been identified on a strategic scale that growth can occur in the region, this is subject to controls being put in place to minimise the effect of new development on existing water resources. This may be harder to achieve in smaller developments due to viability, but should be achievable in strategic development sites through greywater recycling and localised water reuse infrastructure.</li> <li>• Haslingfield Parish Council: object as Building Regulations are drawn up for the average situation in the UK, whereas Cambridgeshire is one of the driest areas in the country so 'average' is not appropriate. New housing developments should be required to be as water efficient as possible as this will not stop developers building but will ensure new developments create a minimum additional demand on a scarce resource.</li> <li>• Middle Level Commissioners: a degree of caution is required, particularly given the financial climate; therefore it may be best to have a standard for certain developments, e.g. higher standards for larger developments and lower standards for smaller developments. External funding is likely to</li> </ul>

	<p>be required. To be fully accepted this policy would need to be endorsed by senior Members but they are unlikely to do this if it restricts development.</p> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Campaign to Protect Rural England: this is a water stressed district which has difficulty in supplying its existing population, so lack of water is a limiting factor for any development.</li> </ul>
<p>ii. Seek additional measures such as water efficient fixtures and fittings (to achieve equivalent of Code 3 or 4 of Code for Sustainable Homes), subject to financial viability.</p> <p>Support: 26 Object: 1 Comment: 5</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support as this is a reasonable level where there are some benefits realised in a shorter timescale.</li> <li>• Support as all provisions that improve the standard of new homes should be used.</li> <li>• Cambridge Water: Code for Sustainable Homes Levels 3 &amp; 4 for water efficiency can be achieved cost effectively at the construction stage and therefore this should be considered as the minimum standard for new dwellings, given the region is classified as an area of water stress. This would help ensure the future protection of water resources in an area of considerable growth.</li> <li>• Supported by Cottenham, Great Abington, Hauxton, Little Abington, Over, Steeple Morden and Weston Colville Parish Councils and Conservators of the River Cam.</li> <li>• Environment Agency: support as the district is located in an area of water stress, and therefore higher standards should be sought. Whilst it has been identified on a strategic scale that growth can occur in the region, this is subject to controls being put in place to minimise the effect of new development on existing water resources. This may be harder to achieve in smaller developments due to viability, but should be achievable in strategic development sites through greywater recycling and localised water reuse infrastructure.</li> <li>• Great Shelford Parish Council: support but “subject to financial viability” is a let out and should be reconsidered. If good energy efficiency and sustainability is incorporated into every new home, economies of scale will apply and bring down the costs.</li> <li>• Haslingfield Parish Council: support as Cambridgeshire is one of the driest areas in the country. New housing developments should be required to be as water efficient as possible as this will not stop developers building but will ensure new developments create a minimum additional demand on a scarce resource.</li> <li>• Support as this seems reasonable, is essential and and is an achievable balance between cost and benefit. Further reductions might be necessary at a</li> </ul>

	<p>later date.</p> <ul style="list-style-type: none"> <li>• Support and should be a requirement regardless of financial viability.</li> <li>• Support as this option seems the most appropriate compromise between the need for water efficiency and the need for affordable homes.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Object as all new developments should be required to the highest level.</li> <li>• You can't simply impose more and more costs on a new house as it drives up prices to unaffordable levels – houses are already too expensive.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Campaign to Protect Rural England: this is a water stressed district which has difficulty in supplying its existing population, so lack of water is a limiting factor for any development.</li> <li>• Make sure the fixtures are water efficient and also do the job efficiently.</li> </ul>
<p>iii. Seek grey water or rainwater recycling (to achieve equivalent of Code 5 or 6 of Code for Sustainable Homes), subject to financial viability.</p> <p>Support: 27 Object: 5 Comment: 7</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support as without including the more stringent levels of water management the targets for climate change adaptation risk not being achieved. Growth in housing supply only adds to the pressure.</li> <li>• Minimising water use should be a high priority.</li> <li>• Support as new technologies will take time to be adopted and so should be included by developers / led by providers.</li> <li>• Cambourne Parish Council: support as the optimum standard and option ii should be the fall back position if this requirement is not financially viable.</li> <li>• Supported by Oakington &amp; Westwick, Pampisford and Papworth Everard Parish Council and Cambridge City Council.</li> <li>• Cambridge Water: strongly support as this option is the most environmentally beneficial in an area of water stress and considering water recycling at the design and construction stages ensures this can be done in the most cost effective way.</li> <li>• Cambridgeshire County Council: support as considering the planned growth, climate change predictions and precautionary principle, including water efficiency is a sensible approach to dealing with potential future water scarcity.</li> <li>• Environment Agency: support as the district is located in an area of water stress, and therefore higher standards should be sought. Whilst it has been identified on a strategic scale that growth can occur in the region, this is subject to controls being put in place to minimise the effect of new</li> </ul>

	<p>development on existing water resources. This may be harder to achieve in smaller developments due to viability, but should be achievable in strategic development sites through greywater recycling and localised water reuse infrastructure.</p> <ul style="list-style-type: none"> <li>• Gamlingay Environmental Action Group: support as this is a sensible option but the “subject to financial viability” opt out clause should be removed.</li> <li>• Great Shelford Parish Council: support but “subject to financial viability” is a let out and should be reconsidered. If good energy efficiency and sustainability is incorporated into every new home, economies of scale will apply and bring down the costs.</li> <li>• Haslingfield Parish Council: support as Cambridgeshire is one of the driest areas in the country. New housing developments should be required to be as water efficient as possible as this will not stop developers building but will ensure new developments create a minimum additional demand on a scarce resource.</li> <li>• Support and for larger schemes at least 25% should be required to meet this target.</li> <li>• Support as grey water recycling clearly represents the most sustainable use of resources and the Cambridge area should be leading in the adoption of these technologies.</li> <li>• Support as long as the measures do not overly burden potential occupants.</li> <li>• Support as in the longer term demand in the eastern region will force this option on all new builds and make it an attractive selling point.</li> <li>• Support as the cost of excessive water use on the environment is far higher.</li> <li>• Support as water supply and drainage are particular problems in the eastern region and it would be wise to include these requirements on all developments. In an area of limited water supply, this is the only option.</li> <li>• Wildlife Trust: South Cambridgeshire is an area of water stress and therefore should be requiring maximum standards in all new developments. If there are questions of viability in the short-term it may be necessary to lesson other requirements but push for higher water efficiency.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Fen Ditton Parish Council: object as greywater recycling or rainwater harvesting may be expensive and not deliver real benefits to the water environment.</li> <li>• You can’t simply impose more and more costs on a new house as it drives up prices to unaffordable</li> </ul>
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	<p>levels – houses are already too expensive. There are also maintenance costs.</p> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Campaign to Protect Rural England: this is a water stressed district which has difficulty in supplying its existing population, so lack of water is a limiting factor for any development.</li> <li>• Middle Level Commissioners: promote the use of rainwater collection and greywater recycling but these should be in addition to but not replace a surface water disposal system. Community systems are only suitable for 'community based' developments such as housing associations, unless dealt with through a formal agreement.</li> <li>• All new houses should be fitted with water meters as standard – only by doing this will ensure that water users pay for their water use.</li> </ul>
<p>Please provide any comments.</p> <p>Support: 1 Object: 0 Comment: 14</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Comberton Parish Council: developers should be encouraged to propose different ways of meeting the high level targets for sustainability. The Local Plan should not select the specific solutions (that should be left to developers or experts in this matter) and SCDC should seek expert advice to set targets at leading edge levels to ensure developers have to make the best effort possible. As a minimum (subject to viability), seek additional measures such as water efficient fixtures and fittings to achieve Level 3 or 4, and use of brown water should be encouraged where possible.</li> <li>• Croydon Parish Council: all homes should be water efficient, but the clause "subject to viability" probably means that nothing will be done as it is deemed too expensive. Considering the recent water problems, efficient use is a high priority.</li> <li>• Histon &amp; Impington Parish Council: low flush toilets and restricted flow taps all require behaviour change from residents, so are mostly ineffective. However, greywater recycling and rainwater harvesting saves water without requiring a behaviour change, so quality of life is not affected. High targets just add costs and don't necessarily achieve the best results. Setting insulation, airtightness, water recycling and energy generation as planning conditions would be more effective.</li> <li>• Should consider a combination of options ii and iii, and inclusion of earth closets in public toilets and public buildings.</li> <li>• Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and</li> </ul>

	<p>encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</p> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Greywater and/or rainwater recycling is not likely to achieve Level 5 or 6 in practice and cannot be applied to all types of building. The water problem is likely to put a stop to future development in the district not long after the end of the plan period and therefore the Local Plan should take this into account.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Cambridge City Council Labour Group: water efficiency cannot be achieved without measures to reduce usage by the existing community via offset funding from new development. This should also be used to prompt new renewable energy.</li> <li>• Countryside Restoration Trust: concerned about the abstraction of water needed for all planned properties on the local water cycle – new buildings require more water.</li> <li>• Ickleton Parish Council: the underlying problem is that we are being asked to build more homes in an area that is verging on arid. New homes need to be water efficient as a minimum.</li> <li>• Middle Level Commissioners: harvesting of excess water for agricultural use or urban areas would reduce the demand for potable water – failure to consider this could have severe economic effects. Also relatively easy alternatives e.g. media campaign (effective in changing behaviour on recycling), increased costs to the consumer to force more efficient use. Why is there no policy for non-residential buildings?</li> <li>• Problems could be created if changes to weather patterns, run-off to drainage systems and water usage modelling is not considered and identified as being sufficient prior to building.</li> <li>• Rainwater harvesting is not an infinite resource.</li> <li>• Support the use of rainwater harvesting and greywater recycling, as not to do so is wasteful, but do not support enforced installation. If there isn't enough water for more homes, there should not be more homes.</li> </ul>
<p><b>QUESTION 25: Water Quality</b></p>	
<p>A. Have the right approaches to managing, protecting and enhancing</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support and special consideration should be given to protecting the chalk aquifers south of Cambridge</li> </ul>

<p>water quality been identified?</p> <p>Support: 31 Object: 5 Comment: 3</p>	<p>and well field protection zones are in place to protect Cambridge Water Company's boreholes.</p> <ul style="list-style-type: none"> <li>• Supported by Cambourne, Comberton, Cottenham, Croydon, Foxton, Great Abington, Haslingfield, Litlington, Little Abington, Over, Pampisford, Rampton, Steeple Morden and Weston Colville Parish Councils, Cottenham Village Design Group and Wildlife Trust.</li> <li>• Support but details will vary with specific applications.</li> <li>• All developments should embrace SuDs principles.</li> <li>• Support and adequate planning should ensure water quality is maintained, and where this is overlooked the polluter should always pay.</li> <li>• Environment Agency: support as need to ensure the district adheres to the principles of the European Water Framework Directive by ensuring that new development does not result in the deterioration of water quality. Would be happy to provide additional information to assist in the production of the policy.</li> <li>• Support as it is vital that aquifers should not be overdeveloped and that any development does not pollute the ground water.</li> <li>• Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Fen Ditton Parish Council: the Local Plan should be separate from Environment Agency responsibilities for consenting and Water Framework Directive but should simply reference it.</li> </ul>
<p>B. Are there any other issues which should be included?</p> <p>Support: 3 Object: 0 Comment: 6</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Environment Agency: need to ensure the district adheres to the principles of the European Water Framework Directive by ensuring that new development does not result in the deterioration of water quality. Would be happy to provide additional information to assist in the production of the policy.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Should also consider flood risk.</li> <li>• Conservators of the River Cam: the absence of a foul water sewer to service Chesterton Fen is a disgrace, Anglian Water should be forced to re-assess this as a matter of urgency.</li> </ul>

	<ul style="list-style-type: none"> <li>• Cambourne Parish Council: a policy should be included requiring the inspection and signing off of drainage systems to mitigate against combining foul and surface water drains.</li> <li>• The effect of new development on surface water run-off should be considered and provision made to reduce the impacts of reduced infiltration that occurs from urbanisation of previously green areas.</li> </ul>
<p><b>QUESTION 26: Sustainable Drainage Systems / Managing Flooding</b></p>	
<p>A. Have the right approaches to managing water and drainage sustainably been identified?</p> <p>Support: 37 Object: 0 Comment: 10</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Anglian Water Services Ltd: surface water disposal should follow the drainage hierarchy. A sustainable solution (SuDS) should be investigated and implemented where possible and if this is not viable then drainage to a surface water sewer will be considered. Anglian Water offer a pre-development service to developers providing the opportunity to discuss requirements for their proposal.</li> <li>• Support as incorporating SuDS into development is vital to mitigating the impact of the proposal. If determined at an early stage, SuDS can be designed as an intrinsic part of the scheme.</li> <li>• Supported by Cambourne, Comberton, Cottenham, Foxton, Great Abington, Haslingfield, Litlington, Over, Pampisford, Rampton, Steeple Morden, Swavesey and Weston Colville Parish Councils, the Conservators of the River Cam and the Wildlife Trust.</li> <li>• Cambridge City Council Labour Group: SuDS should be included on major developments.</li> <li>• Cambridgeshire County Council: support the requirement that sustainable surface water drainage is integrated within the built environment and the inclusion of references to the national and Cambridgeshire SuDS manuals.</li> <li>• Support as it is vital that any scheme coming forward is able to provide a sustainable approach to drainage and mitigate any potential impact on flooding. Should be considered from earliest stages so that schemes can incorporate the measures throughout.</li> <li>• Cottenham Village Design Group: support as this is especially important within and / or adjacent to low lying areas e.g. Cottenham.</li> <li>• Countryside Restoration Trust: storm events likely to wash more soil and pollutants into rivers and flooding could become a major issue. Flood meadows next to rivers should be increased and there should be no building in flood plains.</li> </ul>

	<p>Reservoirs should be used to stabilise water demand and supply. Abstraction must be viewed as a luxury and efficient water use and water recycling must be requirements for all developments.</p> <ul style="list-style-type: none"> <li>• Environment Agency: support and would be happy to provide additional information and assist in the production of the policy.</li> <li>• Support but on permeable ground, hardstandings should be permeable.</li> <li>• Histon &amp; Impington Parish Council: SuDS should be encouraged as they work, are cost effective, and are environmentally enhancing. The policy needs to be site sensitive as in some areas with high water tables SuDS are not suitable.</li> <li>• Middle Level Commissioners: generally agree that SuDS are the preferred option in certain situations but infiltration devices do not work unless there is sufficient space to install them and current housing density does not allow this.</li> <li>• Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Before building commences, the effects of changes in the weather patterns, risks of flash flooding and level of run-off need to be modelled to ensure the drainage system is suitable.</li> <li>• Upkeep of systems is a vital issue.</li> <li>• Concerned that the SFRA and Environment Agency flood maps are not up to date for the areas around Longstanton. A significant level of mitigation work has been undertaken and therefore the maps should show that Longstanton is no longer at risk of flooding.</li> <li>• Issues appear to have been identified but not implemented.</li> </ul>
<p>B. Are there any other issues which should be included?</p> <p>Support: 0 Object: 0 Comment: 15</p>	<p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Cambourne Parish Council: a policy should be included requiring the inspection and signing off of drainage systems to mitigate against combining foul and surface water drains.</li> <li>• Conservators of the River Cam: should also include measures for managing drought.</li> <li>• Croydon Parish Council: should also include: not building on flood plains where there is any risk of</li> </ul>

	<p>flooding, leaving enough space for the absorption of surface water, and listening to local knowledge on flooding.</p> <ul style="list-style-type: none"> <li>• Hauxton Parish Council: drainage should be considered as a whole, not just on the development site – it is important to establish that the drainage network as a whole can cope and that the problem is not merely diverted to another landowner.</li> <li>• If the local drainage board requires run-off at a greenfield rate, it would be proactive if all steps are taken to achieve, exceed and maintain this long term.</li> <li>• Middle Level Commissioners: a holistic approach will require considerable masterplanning, together with the resolution of funding and maintenance issues. Given that the area is water stressed, it would be appropriate to allow SuDS to form part of a hydrological train where the retained water could be used for irrigation or water harvesting.</li> <li>• Need to advise residents on the negative impact of phosphate based products on aquatic environments and the alternatives available.</li> <li>• Concerned that the SFRA and Environment Agency flood maps are not up to date for the areas around Longstanton. A significant level of mitigation work has been undertaken and therefore the maps should show that Longstanton is no longer at risk of flooding.</li> <li>• Swavesey Parish Council: mitigation measures should be in place in advance of development.</li> <li>• Drainage must be a top priority in considering new developments – it is unfair to expect adjoining landowners to cope with the excess of water.</li> </ul>
<b>QUESTION 27: Flood Risk</b>	
<p>A. Have the right approaches to managing flood risk been identified?</p> <p>Support: 46 Object: 1 Comment: 16</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• Support but this will need rigorous enforcement.</li> <li>• Bourn Parish Council: support as this policy must consider tributary systems as a whole to avoid developments leading to downstream problems.</li> <li>• Supported by Cambourne, Comberton, Cottenham, Croydon, Foxton, Great Abington, Litlington, Little Abington, Over, Rampton, Steeple Morden, Swavesey, Waterbeach and Weston Colville Parish Councils, and Conservators of the River Cam.</li> <li>• Cambridgeshire County Council: support the inclusion of a policy that should include a reference to the Surface Water Management Plan (SWMP) and welcome the consideration of the SWMP in assessing development options. It should also be used in assessing planning applications.</li> <li>• Support as there should never be development on flood plains. Although in engineering terms it can</li> </ul>

	<p>be made safe, it can have devastating effects on individuals and communities. Managing flood risk after development is much more difficult and expensive than building in lower risk areas.</p> <ul style="list-style-type: none"> <li>• Support and a robust and comprehensive approach to flood risk must be taken at the outset of any potential scheme.</li> <li>• Fen Ditton Parish Council: issues 1 and 3 are ok, but issue 2 is an Environment Agency responsibility.</li> <li>• Cottenham Village Design Group: support as the impact of flooding on low lying areas of the county (e.g. Cottenham) would be great, therefore management of this issue by an effective policy is seen as being of particular benefit.</li> <li>• Environment Agency: highly supportive of a policy to address this issue and we would be happy to provide additional information and assist in the production of the policy.</li> <li>• Support as it is essential that flood risk is minimised in this area and need to avoid past errors of allowing building in flood plains.</li> <li>• The NPPF should be followed to ensure that developing land will not increase flooding on neighbouring land.</li> <li>• It is crucial that South Cambridgeshire District and Cambridge City Councils are working together on flood risk issues, and any development that would increase flood risk from Bin Brook should be rejected as flood risks should be minimised across the county.</li> <li>• Haslingfield Parish Council: development should not be allowed in areas with medium to high flood risk.</li> <li>• Support and should require that standards at the time of development (e.g. greenfield rates) are maintained long term.</li> <li>• More explicit integration of managing flood risks in new developments is desirable.</li> <li>• Middle Level Commissioners: a flood risk assessment should meet the minimum requirements of the NPPF, the SFRA, relevant aspects of the Pitt Report and be supported by adequate technical data and designs. The Board's catchment is only protected to 1:10 and therefore the Board is concerned with any development proposed within its catchment e.g. Northstowe, A14. The Board is also concerned with foul effluent flows and Uttons Drove Sewage Treatment Works.</li> <li>• Oakington &amp; Westwick: support but 'could' should be replaced by 'should'.</li> <li>• Provision for flood water storage which benefits biodiversity and reduces flood risk should be integrated into new developments.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Support as it is important that flooding and drainage are identified at the earliest opportunity is that appropriate mitigation can be included.</li> <li>• Wildlife Trust: flood risk management approaches can also provide opportunities for the enhancement of the natural environment and biodiversity, and this should be explicitly recognised in the policy.</li> <li>• Natural England: welcomes the climate change chapter of the Local Plan which promotes SuDS, seeks to minimise flood risk and enhance water quality, ensures sustainable construction, and encourages renewable and low carbon energy development. Satisfied that this section recognises the benefits of green infrastructure, open space and vegetation in helping to reduce the effects of climate change. [LATE REP]</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• The sequential approach makes little sense as each planning application is judged on its merits. You cannot steer a developer to develop on land they do not own. Would be better to say 'no development lower than 5m contour'.</li> <li>• Flooding is covered by the NPPF and therefore it is not considered that a policy is necessary.</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Maintenance is vital as flood risk can increase markedly from failures of upkeep.</li> <li>• The effect of the proposed new developments on flood risk of the surrounding areas has not correctly been assessed.</li> <li>• Issues appear to have been identified but ignored when planning new developments.</li> </ul>
<p>B. Are there any other issues which should be included?</p> <p>Support: 4 Object: 0 Comment: 13</p>	<p><b>ARGUMENTS IN SUPPORT:</b></p> <ul style="list-style-type: none"> <li>• The Surface Water Management Plan should be strictly adhered to.</li> </ul> <p><b>OBJECTIONS:</b></p> <ul style="list-style-type: none"> <li>• Foxton Parish Council: some of the site options are partly in the flood plains.</li> <li>• Swavesey Parish Council: not satisfied that the issues are being adequately dealt with or strongly enough in some instances.</li> <li>• .</li> </ul> <p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Risk assessments should include the effects of future climate changes, including the possibilities of extreme event frequencies and magnitudes.</li> <li>• Design policies that keep ceilings and roofs low can increase the risk of flooding if they prevent the construction of floors at a height above sea level.</li> </ul>

	<ul style="list-style-type: none"> <li>• Cambourne Parish Council: a policy should be included requiring the inspection and signing off of drainage systems to mitigate against combining foul and surface water drains.</li> <li>• Run-off from Cambourne has flooded Bourn badly as insufficient attention was paid to controlling run-off.</li> <li>• The right approach appears to be outlined, it is essential that it be implemented systematically and thoroughly.</li> <li>• It is important that climate change is taken into account in the SFRA.</li> <li>• Middle Level Commissioners: should promote early consultation on development briefs and planning applications where the proposal has material drainage considerations and / or is: within or adjacent to the Boards watercourse or drain and / or any other flood defence structure; within an ordinary watercourse; proposing direct discharge of surface water or treated effluent; affecting more than one watercourse; within an area of actual flood risk; and / or within maintenance access strips.</li> <li>• Recent developments in Comberton have caused drainage and sewerage problems which need to be resolved and future developments should have better provision.</li> <li>• Housing development at Sawston should avoid areas that have the potential to cause severe social and economic harm to homeowners and tenants, such as locating homes in areas at risk of flooding.</li> </ul>
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