

**Representations to the Greater Cambridge  
Local Plan First Proposals Consultation 2021  
Bourn Airfield New Village**

Countryside Properties

December 2021

**Turley**

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**Client**

Countryside Properties UK Ltd

**Our reference**

COUS3003

24 Nov 2021

# 1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Countryside Properties (“Countryside”) in respect of the Greater Cambridge Local Plan (“GCLP”) – First Proposals Consultation 2021.
- 1.2 Countryside have interests within the Local Plan area including Bourn Airfield New Village which is allocated under the adopted South Cambridgeshire Local Plan Policy SS/7. The majority of the allocation site is the subject of a current planning application under reference S/3440/18/OL. The planning committee of South Cambridgeshire District Council resolved to grant planning permission on 19<sup>th</sup> February 2021 for the following description of development:
- “Outline planning permission for a new mixed use village comprising residential development of approximately 3,500 dwellings; mixed uses comprising employment, retail, hotel, leisure, residential institutions; education, community facilities, open space including parks, ecological areas and woodlands, landscaping; engineering for foul and sustainable urban drainage systems; footpaths, cycle ways, public transport infrastructure; highways including a principal eastern access from the roundabout in St Neots Road and western access with Broadway including first section of strategic public transport route; associated infrastructure, groundworks and demolition; with all matters reserved except for the principal highway junctions from the St Neots Road roundabout and onto Broadway with some matters reserved except for access.”*
- 1.3 As such this representation focuses on issues particularly affecting Bourn Airfield New Village. Each of the responses relates to a particular policy or paragraph proposed within the consultation document, and this report is structured accordingly. Matters related to the Climate Change Theme of the GCLP are addressed in Section Three of the report.

## 2. Response to the First Proposals Consultation Document

### Policy S/NS: Existing New Settlements

- 2.1 We support the intention to carry forward the existing allocations for the new settlements allocated in the South Cambridgeshire Local Plan (2018) which will continue to form an important source of supply in the Greater Cambridge Local Plan. We note that a map of the boundaries of the allocations is provided at the end of the consultation document. For clarity we consider the proposed policy maps should include both the Strategic Site Boundary and the Major Development Site Boundary.
- 2.2 Of the three new settlement sites, Bourn Airfield is the only one not proposed to have amended annual delivery rates. Countryside consider that the annual rates for Bourn Airfield have the potential to be higher than previously stated due to the mix of tenures which has been agreed within the outline. Providing a broad mix of tenures across the sites will allow the delivery of a wide range of housing products which can be delivered without competing with each other.
- 2.3 It is considered that the Bourn Airfield new village has the potential to deliver the following housing trajectory:

2021/2022 – 0

2022/2023 - 0

2023/2024 - 35

2024/2025 - 160

2025/2026 – 190

With 190 housing completions per annum thereafter.

### Policy BG/TC: Improving Tree Canopy Cover and the Tree Population

- 2.4 Whilst the spirit of the policy is supported, concern is raised regarding certain elements of the current proposed policy direction.
- 2.5 The current policy direction seems somewhat contradictory stating in one bullet that seemingly all trees should be protected (no matter what their value), whilst another suggests only trees of value (as measured by a recognised tool such as iTree) should be protected. In any event it is considered additional flexibility should be introduced to allow for instances where trees are required to be removed due to disease, age or safety concerns which renders their retention inappropriate. Flexibility should also be allowed for where in some instances the removal of trees, in whole or part, is required in order for the development to be brought forward and this loss should be weighed against the benefits of the proposals.

- 2.6 Furthermore the necessity of stipulating a recognised tool such as iTree is questioned. Assessment should be undertaken in accordance with relevant professional guidance and supported by tools as appropriate. Further detail is not considered necessary or justified.

#### **Policy GP/QD: Achieving High Quality Development**

- 2.7 Countryside are supportive of the aspiration to achieve high quality design through development which accords with its own ethos and approach to development. The following minor points requiring clarification are however raised:
- the need to successfully integrate waste, recycling and parking is referenced twice in the policy under 'climate-positive' and 'local character' which does not need to be repeated under the same policy.
  - Clarification should be provided within the policy as to what is regarded as 'significantly taller' to understand when additional assessment will be required.

#### **Policy GP/QP: Establishing High Quality Landscape and Public Realm**

- 2.8 The approach to high quality landscape and public realm is supported. A minor comment is made on the last bullet point of the policy, which sets out the need to 'provide appropriate types of open space whether in urban or more rural places that link into other sequences of existing or new landscape spaces and wider settings'. It is queried how the measure of 'appropriate' will be tested and applied given the significant prospects of variety in how this term is applied.

#### **Policy J/RW: Enabling Remote Working**

- 2.9 Countryside support the approach under this policy to take account of the current and likely future trend for working at home, largely as a result of the COVID-19 pandemic. The Bourn Airfield proposals will make appropriate provision to achieving the objectives of this policy through the provision of co-working space and provision of fibre broadband to all homes.

#### **Policy H/HM: Housing Mix**

- 2.10 Countryside are supportive of the approach to this policy in that housing mix 'recommendations' are provided, along with these being set out as a 'range'. This is a positive format for the housing mix policy by providing flexibility which will allow the development at Bourn Airfield to respond to changing market conditions and requirements.

#### **Policy H/BR: Build to Rent Homes**

- 2.11 Build to Rent (BTR) Homes are an important housing model for diversifying the housing market as has been recognised by the Government through the NPPF and PPG and there is a requirement to plan positively for rented homes in Local Plans. The inclusion of a policy specifically addressing this form of development is therefore supported. BTR

expands residents' access to, and choice of, good quality housing, helping affordability in the widest sense.

- 2.12 BTR is different from the existing private rented sector offer through the professional management and longer tenancies for those who want them of high-quality, purpose-built homes. It is important to recognise that whilst the BTR sector may have initially been focused on town/city centre developments of apartments the model has diversified to include all types of homes including family homes. BTR can also increase the overall supply and accelerate the construction of new homes due to the different market it serves.
- 2.13 Countryside recognise the important role that the BTR sector can play as part of the overall mix of housing to be provided at Bourn Airfield which will include a policy compliant 40% affordable housing. It is considered that the provision of BTR will further broaden the appeal of living as part of a new community by widening the choices available and will assist in bringing forward the proposed development more swiftly than originally envisaged by the Council.
- 2.14 The PPG provides the following guidance to LPAs in preparing Local Plans which consider BTR:

*“As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent. Specific demographic data is available on open data communities which can be used to inform this process. The assessment will enable an evidence-based planning judgement to be made about the need for build to rent homes in the area, and how it can meet the housing needs of different demographic and social groups.*

*If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent. This should recognise the circumstances and locations where build to rent developments will be encouraged – for example as part of large sites and/or a town-centre regeneration area.”*

*Paragraph: 001 Reference ID: 60-001-20180913*

- 2.15 The PPG is therefore clear that the onus is on LPAs to consider how BTR can meet housing needs and create mixed and balanced communities. Concern is therefore raised that the proposed policy direction seemingly seeks to direct this requirement on to the applicant rather than being considered in a Plan led manner. It is considered there is a clear and evidenced need for BTR provision in the Greater Cambridge area and therefore the Local Plan should be positively planning to support this as part of a diversified housing market.
- 2.16 The proposed policy direction also seeks to seemingly restrict how much BTR could be brought forwards, although a decision on the exact quantum is deferred for later stages of plan-making. Concern is raised regarding this proposed approach. Whilst we understand from the supporting text that the Council are concerned that the provision of a significant quantum of BTR would result in a reduction in the level of the overall affordable housing delivery (as BTR would likely be subject to a 20% affordable housing

requirement rather than the 40% of general market housing locally) it is necessary to consider the needs for all forms of housing. Although no quantum is proposed at this stage, it is noted that the draft North East Cambridge Area Action Plan (AAP) proposes a restriction of no more than 10% of the total housing across the AAP being BTR. Importantly the AAP is only in draft and we are unaware of any similar restrictions being successfully introduced elsewhere in the country. Clearly no such restriction could be applied to other forms of private rented accommodation by private landlords. It is therefore considered such an approach is unjustified.

- 2.17 A variety of business models will exist for the provision of BTR and therefore flexibility should be allowed within the final policy wording to reflect this. It should be noted that Countryside will deliver BTR on Bourn Airfield whilst also delivering a 40% policy compliant level of affordable housing.

### **Policy I/EV: Parking and Electric Vehicles**

- 2.18 Countryside support the principle of the proposed policy and the aspirations it seeks to achieve. It will be important that the policy wording allows sufficient flexibility to respond to changing travel habits and technologies over the course of the Plan period. It is also important that the policy allows for changes in requirements depending on the location of developments and the availability of alternative modes of travel, existing cycle provision etc. These are all key considerations in relation to the delivery of the Bourn Airfield proposals and will be used to inform the development of the reserved matters applications following the grant of outline planning permission.

### **Policy I/DI: Digital Infrastructure**

- 2.19 Whilst we support the aspirations of the policy and Countryside recognise the importance of the necessary digital infrastructure to support new developments, it is important that the eventual policy wording recognises to what degree these elements are under the control of the developer themselves as opposed to statutory undertakers etc.

### 3. GCLP Climate Change Theme

3.1 These representations are focused on the Climate Change Theme of the GCLP and the following policies:

- CC/NZ: Net Zero Carbon in New Buildings
- CC/WE: Water Efficiency in New Developments
- CC/DC: Designing for a changing climate
- CC/ FM: Flooding and Integrated Water Management
- CC/ RE: Renewable Energy projects and infrastructure
- CC/ CE: Reducing Waste and supporting the local economy
- CC/ CS: Supporting land-based carbon sequestration

3.2 Countryside fully supports the strategic commitment by the GCLP to positively address the issue of climate change mitigation and adaptation within the plan period and welcome the opportunity to comment on the draft policies to ensure they evolve to meet the tests of soundness and are both deliverable and viable whilst supporting the delivery of much needed high quality, private and affordable homes within Greater Cambridge.

3.3 Bourn Airfield already benefits from a recommendation for outline planning permission and is supported by a strong sustainability strategy that deploys extensive renewable energy technologies across the development.

#### **Countryside's Corporate Commitment to Net Zero.**

3.4 Countryside supports the emphasis placed on responding positively and proactively to climate change in the Greater Cambridge Local Plan (GCLP). This aligns closely with Countryside's own ambitions for their business operations and future development sites.

3.5 Countryside recognises the recently published findings by the International Panel on Climate Change (IPCC), which makes clear that the chances of crossing the global warming level of 1.5°C in the next few decades is likely unless immediate, rapid and large-scale action is taken.

3.6 To ensure Countryside plays its part, the company has recently published its Corporate Strategy 'Path Finder – Marking Out the Route to Net Zero'<sup>1</sup> which sets out the company's strategy to achieving net zero. As part of this strategy Countryside have set science-based carbon targets which have been verified by the Science Based Carbon Institute, and are to:

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<sup>1</sup> <https://investors.countrysideproperties.com/sustainability-approach>



- Reduce our absolute Scope 1 and 2 emissions by 42% by 2030
  - Reduce our Scope 3 emissions by 52% per sqm built by 2030
- 3.7 The GCLP Plan, and its emphasis on climate, will also play a very important role in meeting the challenges put forward by the IPCC. It is important to note that in meeting its net zero ambitions, one of the most important steps that the GCLP can take is to ensure that its spatial distribution strategy directs growth to locations that are sustainable and help to facilitate reductions in GHG emissions by reducing the need to travel by private car for work and leisure.
- 3.8 As a general theme, Countryside support the strategic objectives of the policy but note that the targets presented within the GCLP will introduce some of the highest sustainability standards in the UK at a time when the housebuilding industry is already responding at pace to the introduction of the Governments Future Homes Standard.
- 3.9 Given the volume of new homes required within Greater Cambridge there is a risk that the introduction of these standards will restrict the delivery of new homes particularly given that the supply chain is currently not able to deliver these standards at volume. These challenges will also be particularly acute for smaller housebuilders which may further restrict delivery and diversity within the market.
- 3.10 Whilst Countryside note the ambition of the GCLP, it is important that the sustainability policies do not restrict the delivery of much needed new private and affordable housing across the county. To meet the requirements of the National Planning Policy Framework, these policies must be supported by a robust evidence base and viability assessment that demonstrates these policies and targets are deliverable.

#### **The Greater Cambridge Local Plan Policies.**

- 3.11 Countryside have reviewed each of the draft policies within the climate change section of the GCLP and have provided representations for each policy which we hope is of assistance to the Greater Cambridge Shared Planning authorities. Our focus is to ensure that each policy is both viable and deliverable whilst facilitating a shared objective of delivering more high quality affordable and private homes in an area with current and growing demand.
- 3.12 Where necessary these representations make reference to the GCLP Climate Change Topic Paper<sup>2</sup> which summarises the evidence to support each of the policies and is hereafter referred to as the Topic Paper.
- 3.13 For draft Policy CC/ NZ, we have also reviewed the evidence base supporting these specific policies which is the Greater Cambridge Net Zero Carbon Evidence Base Non-Technical Summary and which is hereafter referred to as the Evidence Base document. Unfortunately a more detailed review of the full evidence is not possible as only the non-technical summary has been published and therefore Countryside reserve the right to amend our representations once this material has been reviewed.

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<sup>2</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/GCLP%20Climate%20Change%20Topic%20Paper.pdf>

3.14 Countryside welcome the opportunity to comment on these draft policies and would be happy to discuss our comments in greater detail with the authorities. We also recognise that these are currently policy options which will be informed by consultation feedback. Countryside look forward to reviewing the next iteration of the draft GCLP.

#### **Policy CC/ NZ: Net Zero Carbon New Buildings**

3.15 This policy introduces new levels of energy use that will be allowed for new development and how renewable energy should be used to meet that energy need. It also introduces requirements for the assessment of whole life carbon by new development and address the potential issue of carbon offsetting.

3.16 The policy introduces the following parameters for energy use for new buildings in order to achieve **Net Zero for Operational emissions**:

- A space heating demand of 15-20kwh per meter square per year for residential and non-residential buildings.
- All heating provided through low carbon sources and not fossil fuels with no new development connected to the gas grid.
- All buildings should achieve a total Energy Use Intensity (EUI) target for both regulated and unregulated energy of no more than 35kWh per m<sup>2</sup> per year with a range of different EUI targets for non-domestic buildings as set out in the policy.
- New development should generate at least the same amount of renewable energy (preferably on-plot) as they demand over the course of a year and this should include all regulated and un-regulated energy. In large developments the energy generation can be averaged across the development to compensate for the inability of specific dwellings to meet the target
- Offsetting can only be used as a last resort and the building should be future proofed to allow residents or tenants to enable the achievement of net zero dwellings.
- To target Net Zero for Construction residential developments of greater than 150 dwellings or 1,000m<sup>2</sup> should calculate the whole life carbon of the development and present measures to reduce these.

3.17 Whilst Countryside recognise the importance of addressing climate change, we do have a number of concerns that draft Policy CC/ NZ is unsound on the basis that it is not viable or deliverable and may reduce the delivery of much needed affordable and private housing within the Greater Cambridge (GC) area. We have summarised our concerns below which we hope are helpful to the authorities in their search for sound and effective climate change policies within the GCLP.

- It is noted that the dwelling energy efficiency targets within draft Policy CC/ NZ go significantly beyond building regulations including the proposed Future

Homes Standard 2025 although the Topic Paper (page 17) states that the standards proposed are not as onerous as the passivhaus standard but do go beyond the proposed FHS. The passivhaus standard is widely recognised as the highest construction standard that is currently available in the UK for residential development as it requires complex construction techniques and therefore carries a cost premium. Analysis of this standard and others compared to the targets within Policy CC/ NZ have identified the following:

- The passivhaus standard<sup>3</sup> requires an EUI of less than 120 kWh m<sup>2</sup> per annum compared to the policy target of 35KWh per m<sup>2</sup> thereby suggesting that the draft policy target is in fact considerably more onerous than passivhaus.
- The EUI within the draft policy CC/NZ appears to have been taken from the recommendations from the London Energy Transformation Initiative (LETI) climate emergency guide<sup>4</sup> which was created to introduce higher standards in Greater London where new development is dominated by low/ high rise apartments that are inherently more energy efficient than typical single and family housing types.
- The passivhaus standard<sup>5</sup> requires a space heating demand of 15 kWh m<sup>2</sup> per annum compared to a draft policy target of 15 – 20 kWh m<sup>2</sup> thereby suggesting close alignment between the two on this specific issue.
- Draft Policy CC/NZ requires applicants to address both regulated and unregulated energy as opposed to the FHS which deals with regulated energy alone. The Government have made this important differentiation because the use of unregulated energy (e.g. power used by televisions and appliances) is the responsibility of the homeowner and not the housebuilder and is extremely difficult to quantify accurately at construction stage.
- To hit the EUI target of 35KWh per m<sup>2</sup> the Evidence base document estimates that the following will be required although no exact details are available:
  - (a) Low U-values that exceed the requirements of the proposed FHS
  - (b) Mechanical Ventilation with Heat Recovery (MVHR) to recover waste heat from the dwellings
  - (c) A high level of air-tightness to prevent cold air ingress and heat loss from the dwelling

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<sup>3</sup> [https://www.passivhaustrust.org.uk/what\\_is\\_passivhaus.php#2](https://www.passivhaustrust.org.uk/what_is_passivhaus.php#2)

<sup>4</sup> [https://www.leti.london/\\_files/ugd/252d09\\_3b0f2acf2bb24c019f5ed9173fc5d9f4.pdf](https://www.leti.london/_files/ugd/252d09_3b0f2acf2bb24c019f5ed9173fc5d9f4.pdf)

<sup>5</sup> [https://www.passivhaustrust.org.uk/what\\_is\\_passivhaus.php#2](https://www.passivhaustrust.org.uk/what_is_passivhaus.php#2)

All of the measures identified above are characteristic of implementing the passivhaus standard.

- The cost of implementing Policy CC/ NZ has been estimated at between 10% and 13% above that required to build to current Building Regulations. No detailed analysis of the assumptions behind this calculation were available however. It is claimed that this cost is achievable on the basis that significant costs are required to implement the FHS and therefore the costs identified by the Evidence base are an over-estimate and are therefore acceptable. Countryside believe it is extremely important to obtain the detailed evidence behind these costs as in our experience the cost of building to passivhaus standards (or extremely close) is likely to be significantly higher than those quoted in the Evidence base paper.
- Given the above it would appear that the Policy CC/ NZ is implementing on-site energy efficiency standards much more closely aligned to passivhaus which presents significant challenges to the housebuilding industry for the following reasons:
  - Building to passivhaus requires a complete transformation of the on-site construction process and supply chain which would significantly delay housing delivery and increase costs of new dwellings particularly for the small and medium sized house builders.
  - The cost of constructing houses to passivhaus is likely to be significantly higher than that identified in the evidence base although a direct comparison is difficult in the absence of the detail behind the assumptions in the Evidence Base. Achieving air-tightness levels close to passivhaus and installing MVHR are extremely costly forms of construction.

3.18 The GCLP states that it has considered alternatives to the draft policy and targets with one being the use of the Government's FHS as the principal metric for sustainable housing. Countryside fully support the introduction of the FHS in 2025 as it will deliver many of the strategic requirements of draft Policy CC/ NZ which include:

- An all-electric energy strategy thereby allowing the carbon footprint of the dwelling to fall each year in line with grid decarbonisation
- Dwellings will have very high levels of insulation and likely require triple glazing to ensure maximum heat retention.
  - Each home built to the FHS will require the extensive use of renewable energy technologies in which are likely to include Air Source Heat Pumps and Photovoltaic cells.
  - There would a consistent, deliverable standard for all new dwellings in Greater Cambridge thereby providing a level playing field for all housing developers. For Bourn Airfield this would provide opportunities for smaller housebuilders and self-build to deploy the same high standard even if this was for a limited number of plots.

- 3.19 Whilst the detailed energy demand / performance metrics for the FHS is unknown at this time the Government have confirmed that dwellings built to this standard will reduce carbon emissions by 75% compared to those built under the current 2013 Building Regulation.
- 3.20 Countryside therefore believe that Policy CC/ NZ of the GCLP should utilise the FHS as the main metric for the construction of energy efficient housing. The use of this standard will also provide greater support to the small and medium (including self-build) housing sector which we believe is critical to ensure greater supply and diversity of affordable housing to the consumer.
- 3.21 In addition to the concern's with respect to the on-site standards presented in draft Policy CC/ NZ, Countryside also have reservations with respect to other aspects of the Policy which are:
- It is unreasonable to prohibit all new developments to connect to the gas grid as it is possible that for buildings such as care homes and health facilities gas may still be the most suitable fuel for heating given the bespoke heating requirement of these health facilities. Given that some of Countryside's sites are large enough (such as Bourn Airfield) to permit the delivery of critical social infrastructure such as schools and health facilities, there may be a technical requirement for gas in some form to our large sites.
  - The requirement for new dwellings to generate at least the same amount of renewable energy as they demand over the course of the year is extremely challenging given that it must include both regulated and unregulated energy for which it is difficult to estimate the exact quantum of energy needed given it is entirely dependent on the occupiers use of appliances.
  - The offsetting policy (although lacking in detail) would appear to be based on the cost of providing additional PV cells to generate the quantum of energy that remains from the development site after all on-site measures have been deployed. At this time however there appears to be no data with respect to the cost of this offsetting policy and how any money will be spent with absolute certainty to ensure 'additionality'. Without any costs or viability information this aspect of the policy fails the test of soundness. It is evident however that this policy will add a significant (albeit unknown at this time) cost to new housing which ultimately will feed into higher house prices and greater affordability challenges. We look forward to seeing the detail of this policy but would urge the authorities to fully explore the viability of this carbon offsetting and its impact upon the delivery of affordable housing before it is adopted.
  - The requirement to calculate Whole Life Carbon (WLC) in construction would increase the importance of reducing embodied carbon within the supply chain, particularly for small and medium sized developers. For Countryside however, we are already committed to reducing our embodied (scope 3 emissions) within the supply chain have set ambitious targets to reduce these over time. The requirement to submit a WLC assessment for each application places an unnecessary burden upon our new development activities as this work is already part of our corporate commitments. To ensure this policy does not negatively

affect housing delivery we would request that the acceptable evidence to demonstrate policy compliance could be details of our corporate commitment and progress to date.

#### Summary of Representations to Policy CC/ NZ:

3.22 In summary, Countryside support the strategic objective of the GCLP to positively address climate change through progressive policies in the plan. We are concerned however that the policies as they stand are unsound as they propose to introduce some of the highest sustainability requirements in the country without a complete evidence base. In order to make this policy sound and facilitate the delivery of much needed high-quality affordable and private housing we recommend the following amendments to Policy CC/ NZ:

- Publication of a complete and full evidence base for stakeholder comments before these draft policies are developed further.
- Adoption of the FHS as the energy efficiency target for new housing and remove the requirement for additional renewable energy deployment.
- Allow flexibility with respect to the use of gas in new developments where gas use is necessary for health/ occupant wellbeing

#### **Policy CC/ WE: Water Efficiency in new developments.**

3.23 This policy introduces requirements for water efficiency in new domestic and non-domestic development in the form of the following:

- 80 litres per person per day for domestic development; and
- Full BREEAM credits for Wat 01 for non-domestic development.

3.24 Countryside acknowledge that the Greater Cambridge area is under water stress and there is a strong encouragement for all new development to improve water efficiency however with respect to draft Policy CC/ WE we have the following comments:

- We agree with the statement on Page 26 of the Topic Paper that the highest water efficiency standard that can be requested by local authorities is 110 l per person per day (pppd).
- We also agree that achieving 80lppd will require either rainwater harvesting and/ or greywater recycling. Both systems introduce significant maintenance requirements (and therefore cost) for homeowners and introduce technology that has not been tested 'en-masse'. Countryside's experience of trialling grey water recycling is that it is unreliable and likely to cause maintenance issues for homeowners
- Given the unreliability of greywater recycling Countryside believe the only practical mechanism to achieve the 80lpppd would be through the use of rainwater harvesting systems which have the following constraints;

- Such systems are more difficult for flats given that communal harvesting tanks (which are more expensive) would be necessary; and
- Greater Cambridge is already one of the driest areas in the UK<sup>6</sup> and climate change is predicated to reduce rainfall in Greater Cambridge by 47% it is highly likely that rainwater harvesting will not capture sufficient rain to meet the policy target and will therefore be ineffective.
- Given the above, Countryside believe that the GCLP should implement the Government’s technical standard for water efficiency for Policy CC/ WE which is 110 lpppd. This would be viable, deliverable and achievable for all new dwellings within GC. Should technology such as grey water recycling become viable during the lifetime of the plan then this could be considered as a means to improve water efficiency beyond the target of 110 lpppd.

**Policy CC/ DC Designing for a Changing Climate.**

- 3.25 This draft Policy introduces requirements to design buildings in accordance with the Good Homes Alliance Overheating in New Homes Tool and Guidance<sup>7</sup>. Countryside recognise the fact that all buildings will need to be designed to adapt to a warming climate and that, depending on the building type and location, this may necessitate the use of a range of measures as recommended in the Good Homes Alliance toolkit such as shading, thermal mass and different modes of ventilation. The policy requires new development to complete the Good Homes Alliance toolkit and implement the cooling hierarchy to minimise the impact of overheating.
- 3.26 Countryside believe that this policy may be ineffective as it requires each developer to implement the guidance in a manner that is appropriate for their site and which therefore may differ from one development to the next.
- 3.27 In January 2021, the Government confirmed the introduction of the FHS and also consulted on the introduction of a range of new building regulation requirements one of which was the introduction of an overheating testing requirement<sup>8</sup> for residential development. This will require all new homes to undergo modelling during detailed design to identify any impact from overheating and then implement mitigation measures accordingly.
- 3.28 As this requirement is proposed to be introduced with the revised changes to the Building Regulation in 2022, Countryside believes that the policy would be unsound on the basis that it is introducing an unnecessary additional burden on development given that it duplicates the requirement of the building regulations.

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<sup>6</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/GCLP%20Climate%20Change%20Topic%20Paper.pdf>. Page 20, Section 5.1

<sup>7</sup> <https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance.pdf>

<sup>8</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/953752/Draft\\_guidance\\_on\\_heating.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953752/Draft_guidance_on_heating.pdf)

3.29 Countryside believe that to reduce the planning and administrative burden upon the housebuilding sector in Greater Cambridge, Policy CC/ DC should be deleted on the grounds that its objectives will be required via Building Regulations.

**Policy CC/ CE: Reducing Waste and Supporting the Circular Economy**

3.30 This policy places requirements upon new development to manage their waste and embrace the principles of the circular economy. The policy requires the following from new development proposals:

- The submission of a Construction Environmental Management Plan (CEMP) proportionate to the size and scale of development
- Provision of adequate waste and material storage facilities on site in accordance with the RECAP Waste Management Design Guide (or successor)
- Submission of a Circular Economy Statement with each application

3.31 Countryside fully support the strategic objective of the policy in terms of its objectives to reduce waste and, perhaps more importantly, encourage circular economy principles in development. As explained earlier in these representations, reducing waste is one of our key objectives and one in which progress is clearly being made on our sites.

3.32 We fully support the requirement to submit a CEMP for our sites as this is something that we already commit to as part of our best practice approach to waste management and environmental protection.

3.33 With respect to the provision of waste management facilities on site, Countryside agree that the correct storage and handling of waste and raw materials is a critical step to responsible management of materials and the prevention of pollution. All of our construction sites deploy best practice measures for the prevention of pollution and provide facilities for the separation and recycling of waste. We therefore support this objective of draft Policy CC/ CE but would ask that the policy recognises that large housebuilders such as Countryside with large and efficient supply chains may use bespoke techniques and practices on site which are not referenced in any guidance but which fully comply with all legislation and best practice.

3.34 With respect to the submission of a circular economy statement, Countryside are happy to provide such information with an application although we would request that this is proportionate to the size and scale of the development in question.

**Policy CC/ CS Supporting land-based carbon sequestration.**

3.35 This policy will protect important land based carbon sinks such as peatland and woodland projects whilst encouraging new development to promote biodiversity and carbon sequestration.

3.36 We recognise the importance of peatlands and woodland to carbon sequestration and agree that these should be protected where possible. It is important to note however



that with respect to new development, there can often be many carbon sequestration benefits associated with the creation of multi-functional green infrastructure and on-site planting which should be recognised when considering the overall 'carbon performance' of new development.

- 3.37 Countryside therefore believe that the draft policy should contain text to support new development if it can be demonstrated that the green infrastructure and woodland it provides will sequester carbon. We believe this should be recognised as one of the many environmental benefits that new development can provide.

### **Summary of representations**

- 3.38 Countryside are pleased to provide our representations to the GCLP in order to ensure the policies are sound and deliverable and facilitate the delivery of much needed private and affordable homes within Greater Cambridge.

- 3.39 Countryside have a strong corporate commitment to positively address the causes of climate change and reduce our environmental impact and we believe we are making positive progress towards our targets.

- 3.40 We fully support many of the strategic objectives of the policy but do feel that some of the detailed targets and requirements within each policy (and specifically Policy CC/NZ) will bring significant additional financial and technical burden to the house building industry and particularly those in the small, medium and self-build sectors. If the recommendations contained within these representations are implemented then we believe this will create a policy framework capable of meeting the significant demand for housing within the region.

- 3.41 We would be pleased to discuss our representations in greater detail with the joint authorities.

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