Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	N/A	Julia Foster
Organisation (where relevant)	Urban&Civic plc	David Lock Associated Limited
Job Title (where relevant)	N/A	Managing Partner
Address, including Post Code	50 New Bond Street London United Kingdom W1S 1BJ	50 North Thirteenth Street Central Milton Keynes Milton Keynes Buckinghamshire United Kingdom MK9 3BP
Telephone	N/A	01908666276
Email address	N/A	JFoster@DavidLock.com

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy CC/NZ: Net Zero Carbon New Buildings
Proposed Submission Policies Map	N/A
Sustainability Appraisal	N/A
Habitats Regulations Assessment	N/A

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	Yes / No
Legally compliant	Yes
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

These representations are submitted by David Lock Associates on behalf of Urban&Civic (U&C). U&C now own the Barracks and Airfield site at Waterbeach, which forms the major part of the Waterbeach New Town allocation. Prior to the purchase of the site, U&C were a development partner to the previous owners, the Defence Infrastructure Organisation.

As master developer, U&C are delivering the redevelopment of the Barracks and Airfield, primarily under Outline Planning Permission S/0559/17/OL (The OPP) (dated 25 September 2019). Outline Planning Permission for redevelopment is also in place on the remaining part of the allocation, in separate ownership.

U&C is proud of the progress made in delivering Waterbeach New Town and remains fully committed to realising its long-term vision.

The emerging Local Plan still has a very important role to play in this endeavour. The new Plan provides a vital driver. While the principle of the development is established and embedded in extant outline planning permissions across the whole site, there remain some significant challenges to accelerating delivery and achieving full build-out.

U&C is extremely concerned that the net zero targets proposed (Paragraph 1 and Part B,5) relate to Total Energy Use (regulated and unregulated) for homes. Requirements relating to unregulated energy use are outside the reasonable control of the developer and therefore cannot form a robust development management requirement.

Mechanisms to achieve this at scale do not exist at the present time. This target is not universally achievable.

U&C seek clarification on the use of ‘maximise’ for the draft Policy wording which relates to generating on-site renewable energy (Part C). This should be quantified.

In relation to energy offsetting (Part D), U&C seek clarity on the offsetting payments referred to in the draft Policy – the Authority should establish an appropriate calculation methodology and define the costs to be paid.

U&C is extremely concerned in relation to the assured performance aspect of the draft Policy (Part D). U&C suggest that the policy is amended to refer to specific development types where the use of an assured performance method should apply. It is prohibitive and particularly onerous to require this for all development types.

U&C is also extremely concerned that the policy as drafted will require all large-scale development to undertake a whole life carbon emission assessment.

An addition has been made to the Policy from the Regulation 18 version (Bullet Point 10) imposing a requirement on all development over 50 homes and 5,000 sq m GIA of employment floorspace to complete in-use energy monitoring. There is no further explanation as to what is required in response to this Policy and whether this is a direction to ensure occupiers have energy usage meters, or whether there is an expectation that an applicant/developer might somehow acquire usage information and report that to the LPA. If it is the latter, the LPA need to address directly how an applicant maintains rights/remit to impose such a demand upon occupiers, once buildings are delivered and occupied by third parties. Furthermore, such an approach would be entirely unjustified as an obligation, as it would serve no practical purpose with regard to making development that is otherwise unacceptable, acceptable: once development is constructed and occupied (and given that in most circumstances the developer is no longer directly engaged in operational development), there is no scope for planning to impose new obligations or restrictions on energy usage. Reporting would therefore serve no legitimate planning purpose. The Policy is not implementable on this basis.

Please provide a 100 word summary of your representation.

Urban&Civic (U&C), master developer of Waterbeach New Town, raises concerns regarding the Net Zero Carbon New Buildings Policy. U&C objects to requirements relating to unregulated energy use, as these are outside developers' control and cannot be robustly assessed or enforced. Clarification is sought on on-site renewable energy expectations and energy offsetting calculations. U&C considers assured performance measures and whole-life carbon assessments overly burdensome if applied universally. U&C also objects to proposed in-use energy monitoring requirements, citing uncertainty, lack of enforceability, practical implementation issues, and limited planning justification.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

N/A

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

U&C suggest that the criteria which states 'All dwellings must achieve an EUI of no more than 35 kWh per meter squared per year' should be amended to set a target for regulated energy use only.

U&C suggest that the policy is amended so that it is specific about the types of development where this is required, and flexibility should be added to indicate how this will be applied in relation to phased development and phased sustainability strategies.

Bullet Point 10 should be removed from the Policy or replaced with a simple commitment to ensure new development provides occupiers with the equipment to monitor energy usage.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed

modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	No

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

N/A

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes