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	Holly Gardiner	Matt Clarke
Organisation (where relevant)	Wates Developments	Boyer
Job Title (where relevant)		Director, Head of Boyer East
Address, including Post Code	c/o Agent	15 De Grey Square De Grey Road Colchester Essex CO4 5YQ
Telephone		01206 584750
Email address		mattclarke@boyerplanning.co.uk

* 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	**CC/WE: Water efficiency in new developments**
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

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.

CC/WE: Water efficiency in new developments

It is recognised that in areas where there are exceptional pressures on water supply that would inhibit the delivery of new development, the Government is supportive of introducing standards lower than those set out in Building Regulations. This was specifically noted in the Joint Statement on addressing water scarcity in Greater Cambridge with the draft NPPF also noting that there may be exceptional circumstances for introducing more stringent standards than those set out in Building Regulations. The standard being proposed in "Shared Standards in Water Efficiency for Local Plans" was for 85 litres per person per day (l/p/d) which would be achieved through a fittings-based approach. With regard to this ambitious standard there is concern that the customer experience will be negatively impacted, whilst over time there would be no effective practical means of preventing the owners of new homes from installing baths or different appliances once they are in occupation. This is noted by the Future Homes Hub in the 'Water Ready' Report which highlighted the perverse outcome of those moving into new homes scrapping perfectly serviceable washing machines, for example.

However, the Council are proposing that developments of over 100 dwellings will be required to meet an even more stringent standard of 80 l/p/d. This lower standard would require development to introduce water recycling or water reuse. As the Council's evidence base notes there are still some concerns as to the legal implications of using reclaimed water for domestic purposes and this is the reason why a standard below 85 l/p/d that can be achieved through a fixtures-led approach is being recommended in the shared standards report. These concerns are reflected in the 'Water Ready' report which notes in relation to water reuse systems that:

"… if they are not well designed and identified, they do increase the risk of cross contamination. There is therefore a need for a clearly defined standard approach to cover items such as layout options, differing pipework sizes or other mechanisms to readily identify these and prevent cross connections and materials; before any such systems can be mandated."

While the policy states that the use of water reuse/recycling is subject to amendments in relevant legislation, it is suggested that until there is clarity as to the legal position on such matters and that there are clear national standards and guidance for installation and maintenance arrangements the Council should not be seeking to require water reuse systems in order to achieve 80 l/p/d which is itself unjustified.

Please provide a 100 word summary of your representation.

While the policy states that the use of water reuse/recycling is subject to amendments in relevant legislation, it is suggested that until there is clarity as to the legal position on such matters and that there are clear national standards and guidance for installation and maintenance arrangements the Council should not be seeking to require water reuse systems in order to achieve 80 l/p/d which is itself unjustified.

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.

Please see accompanying statement

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.

Until there is clarity as to the legal position on such matters and that there are clear national standards and guidance for installation and maintenance arrangements the Council should not be seeking to require water reuse systems in order to achieve 80 l/p/d which is itself unjustified.

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	Yes

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

So that the matters raised within these submissions can be developed through direct discussion in order to assist the Inspector's assessment more efficiently than relying solely on these written representations.

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