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/NZ: Net Zero Carbon Buildings**
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/NZ: Net Zero Carbon Buildings

National policy on this matter, the Planning and Energy Act 2008, the Written Ministerial Statement (WMS) on Local Energy Efficiency Standards and now PM13 in NPPF26 allow Councils to set standards that go beyond those established through building regulations where they are viable and deliverable.

However, in allowing local plans to establish improved targets the WMS and now PM13 establishes how these standards should be applied, stating that they should be expressed as a percentage of TER and calculated using a specified version of SAP. As such it is not considered that the use of targets based on space heating and energy use as set out in parts A and B, and the requirement for these to be achieved using CIBSE TM54 or Passivhaus Planning Package is consistent with national policy. Parts A and B will need to be deleted and replaced with a policy that is consistent with the WMS and NPPF26.

The WMS, and PM13 in NPPF26, requires any standard that goes beyond current building regulations to be robustly costed to ensure that they do not have an adverse impact on viability or deliverability. The implementation will also need to be considered against the Future Homes Standard and what is required above and beyond that standard in terms of how much additional cost is required. It is also not clear what robust evidence has been provided to show that these targets will not impact on the delivery of new homes within Greater Cambridge. Without more detailed evidence considering the deliverability of these standards in relation to the allocated sites and the rate at which new homes are expected to come forward this policy cannot be considered to be sound.

Paragraph 8 under part D sets out that, where the standard cannot be achieved for viability or technical reasons, offsetting will be permitted after all attempts have been made to reduce space heating and energy consumption standards. However, it is suggested that where this policy in combination with other policies in the local plan make development unviable, the use of offsetting does not offer sufficient flexibility. Where meeting this level of energy performance is unviable then the standard should not be applied.

Finally, paragraph 10 under part D states that for reporting purposes all development over 50 homes should complete in-use energy monitoring. However, it is not clear from the policy how this data will be used and what action could be taken should energy use exceed that set out in the policy. This was a point considered by the Inspectors examining the Wokingham Local Plan who have stated in their post hearing letter that a similar clause must be deleted as it was not considered to be an effective policy.

On this basis it is considered that Policy CC/NZ is unsound as it is inconsistent with national policy, and that paragraph 10 should be deleted, as this aspect is ineffective.

Please provide a 100 word summary of your representation.

National policy on this matter allows Councils to set standards that go beyond those established through building regulations where they are viable and deliverable. This requires any standard that goes beyond current building regulations to be robustly costed to ensure that they do not have an adverse impact on viability or deliverability.

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.

It is considered that Policy CC/NZ is unsound as it is inconsistent with national policy, and that paragraph 10 should be deleted, as this aspect is ineffective.

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