



East Cambridgeshire
District Council

**Climate Change
Supplementary
Planning Document
(SPD) – Reg 12(a)
Consultation
Statement**

Version 2 – at adoption stage -
January 2021

1. Introduction

- 1.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Council to consult the public and stakeholders before adopting a Supplementary Planning Document (SPD). Regulation 12(a) requires a Statement to be prepared setting out who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the final SPD.

2. Consultation Undertaken up to and including 12 October 2020

- 2.1. In preparing the draft SPD, internal consultation within the Council took place and this resulted in the drafting and refining of the content of the consultation version draft SPD. The draft was subsequently considered by Finance and Assets Committee of the Council on 24 September 2020, where it was approved for the purposes of public consultation. The papers for that meeting (including a copy of the draft SPD) were publicly available on the Council's website seven days prior to the meeting taking place.
- 2.2. No external consultation took place on or before 12 October 2020.

3. Public consultation, from 13 October and 23 November 2020

- 3.1. Public consultation started on 13 October 2020 and ended on 23 November 2020. Only comments made during that period have been considered.
- 3.2. A copy of the draft SPD was made available for public inspection, free of charge on the Council's website at; www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents
- 3.3. An email was sent out to all consultees on our database. A copy of the email is attached at appendix A. Nearly 480 emails were sent out. These included statutory consultees, local businesses, local organisations, individuals who wish to be informed of planning documents consultations and other stakeholders (see full list at Appendix B). All the comments we received were via email.

4. Representations received

- 4.1. We received 86 comments from 13 separate organisations and individuals to the Climate Change SPD. All the comments received are recorded in table 1 below. The Council has responded to each comment and this is recorded in the Council's Response column. Where changes are proposed to the SPD as a result of these comments, this is clearly shown in the Action Column of the table below. These changes are then included in the adopted version of the SPD.
- 4.2. While most of the comments were seeking changes to the SPD, there were some in support of the SPD. Several respondents highlighted that the SPD should not go beyond its remit and scope.

5. Issues Raised during consultation and how they have been addressed

Table 1: Summary of issues raised and ECDC's response

Comment ID	Consultee Name Chapter/ Para. No./ Policy No. Support/ Object/ Observation	Comments	Council's Response	Action
CLC-01	Anthony Jolley Observation	The Council has a significant role to play in protecting and improving open spaces particularly safeguarding the contribution the Green Belt makes in support of the environment in this epoch of climate change. Furthermore, the Council has a responsibility as a guardian of green open spaces to protect these for future generations particularly in recognition of the current Climate Emergency.	Comments noted.	No change to SPD
CLC-02	Anthony Jolley Observation	The loss of green open spaces has been, and still is, the greatest factor affecting climate change in Britain. Over 97% of Britain's meadows and green spaces have been lost since the 1930s, along with the species of flora and fauna that rely on them for a sustainable habitat. The building of roads, industry or housing in protected areas has often taken priority. Even if these ecosystems are not wholly destroyed by development they may be fragmented into smaller areas, which may be too small for them to remain a viable weapon against climate change.	Comment noted.	No change to SPD
CLC-03	Anthony Jolley	Much of the Green Belt in the area of Bottisham is categorised as chalk grassland helping to sustain a valued ecosystem. The benefits of this ecosystem in helping to reduce the effects of climate change	Comments noted.	No change to SPD

	Observation	include but are not limited to carbon storage, water retention and an established habitat for crop pollinators and indigenous wildlife.		
CLC-04	Anthony Jolley Observation	While the impacts of climate change are daunting, there is growing recognition that Green Belts can be part of the climate solution - the Green Belt's ecosystem is hence indispensable. It reduces the harmful carbon pollution that is driving climate change; it protects people and infrastructure from increasingly severe, flooding, heat waves and droughts; and it also directly reduces some of the primary public health challenges that are exacerbated by climate change.	Comments noted.	No change to SPD
CLC-05	Anthony Jolley Observation	The GB with its open spaces assists in building social cohesion. A community's ability to withstand climate disasters and come back stronger is determined, in large part, by the social fabric of the community. In times of adversity, this social cohesion can define the successes or failures of a community. The Green Belt, parks and open space directly improve environmental resilience; moreover, they build social and economic resilience.	Comments noted.	No change to SPD
CLC-06	Anthony Jolley Observation	No model can predict what nature will or will not do, especially when nature has been distressed by the loss of its ecosystem and degradation. Common sense on the other hand is an humanitarian skill which indicates that such infringements cause more harm than good.	Comments noted.	No change to SPD
CLC-07a	Dr Catherine Judkins Para 3.18 Observation	This section details a number of measures that should be taken into account when considering a commercial scale renewable energy development. There is mention of safeguarding - presumably this means security measures etc. However, safety should also be a consideration. Renewable energy technology is evolving at a rapid pace, so safety guidance will inevitably trail behind. This is particularly relevant to Lithium-ion battery energy storage systems (BESS) that are sometimes installed alongside solar PV sites. There are well documented fire risks with these systems; large scale BESS are rather 'experimental' at this time, as there are not many in operation globally. The siting of BESS should, therefore, be a major consideration from a health and safety perspective, particularly large-scale installations.	Comments noted. Paragraph 3.18 is a summary of the adopted East Cambridgeshire Renewable Energy Development (Commercial Scale) SPD (2014)	No change to SPD

CLC-07b	Dr Catherine Judkins Para 3.18 Observation	Regarding site restoration for agricultural use. Is ECDC not looking for long-term, sustainable solutions for slowing Climate Change? If land is needed for agricultural use, then other locations for solar PV installations or other renewable supplies should be prioritised (e.g. rooftop installations for solar, brownfield sites, etc should be encouraged). There is very little point of a 'temporary' solar energy supply to help slow a permanent climate problem. The Climate Crisis is here to stay, so we need forward-thinking, long-lasting solutions.	<p>Comments noted. In response:</p> <p>Please see East Camb's Environment Plan (A Strategy and Action Plan to Boost the Environment and Help Mitigate Climate Change, June 2020) for details of ECDC's actions following its declaration of a climate emergency in 2019.</p> <p>While ECDC agree that forward thinking, long lasting solutions are needed, unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan ('Local Plan'), and cannot add new or revised policy criteria.</p>	No change to SPD
CLC-07c	Dr Catherine Judkins Para 3.18 Observation	As an increasing number of ground mounted large scale solar PV farms are being developed in greenfield areas, the cumulative impact of these should be taken into account so as to avoid industrialisation of the countryside. Including assessing such installations that might fall under neighbouring council jurisdictions. How are you proposing to monitor this?	<p>Comments noted. In response:</p> <p>ECDC comment on planning applications, including solar applications, in neighbouring authorities where appropriate.</p> <p>The cumulative impact of solar farms is addressed by Local Plan policy ENV6 Renewable Energy Development, which states "...The visual and amenity impacts of proposed structures will be assessed on their merits, both individually and cumulatively...."</p> <p>The Council can reassure that cumulative impacts are always a</p>	No change to SPD

			consideration for all forms of development proposals.	
CLC-07d	Dr Catherine Judkins Para 3.21 Observation	According to Natural England's document on the ecological impact of solar farms ("Evidence review of the impact of solar farms on birds, bats and general ecology (NEER012)"), there is currently NO scientific evidence to support either a gain or loss in biodiversity as a result of ground mounted solar PV farms. Animal habitat loss is a concern with large scale developments on greenfield land due to the large amount of land required. This affects both rare/ in decline species, but also many other species that each play a vital role in the ecosystem. It is misleading to talk about 'net gains' in biodiversity, thus implying that any losses are not significant. It sounds like a kind of 'compensation scheme' - where loss of one species is ok, as long as it's countered with introduction of other species. This approach could have serious long-term implications. Many areas of farmland have existing nature sites within them/ along borders in order to provide wildlife habitats - is the protection of these mandatory? It would seem imprudent to disturb any existing wildlife habitats that are well established.	Comments noted Paragraph 3.21 is a summary of the adopted East Cambridgeshire Natural Environment SPD (2020). The term 'net gain' is in national policy (NPPF), and a full definition and how it will operate forms part of the Environment Bill presently going through parliament.	No change to SPD
CLC-08	Dr Catherine Judkins Para 6.2 Observation	Sections 3.18 and section 6 appear to contradict each other. If the 'built environment should be built to last' and be resilient, adaptive, etc, ECDC should not be considering 'temporary' renewable energy farms. For Solar, ECDC should encourage more rooftop or brownfield installations, which do not need to be temporary and would offer long term, sustainable solutions.	Comments noted. In response, it is true that the vast majority of development should be built to last, so as to enable the maximum use of the resources 'consumed' by the development to occur. However, there are some exceptions, such as solar farms on greenfield land, where the development could be temporary (say, 20 years), and should be designed to be temporary, so that at the end of life it can easily be removed (and materials recycled) and return the land to its former use. More widely, the Council is required to consider all planning applications made, whether for permanent or temporary structures.	No change to SPD

			While EDCDC agree that rooftop and brownfield installations can make a great contribution to lowering emissions, in the right locations greenfield site solar installations can make significant and immediate carbon savings, and can have the advantage of returning the land to its former use should future generations no longer require renewable energy production.	
CLC-09	Huntingdonshire District Council Observation	Huntingdonshire District Council are pleased to note that the SPD takes a proactive stance towards combating climate change.	Comments noted.	No change to SPD
CLC-10	Cllr Ian Lindsay, CoEC Observation	I was asked to comment on the subject draft SPD on behalf of the City of Ely Council at the Full Council meeting of 19 October 2020. I have studied the document closely and discussed it with the Chairperson of our Climate Change Working Party. I am content that the SPD is consistent with the existing planning advice related to climate change and adds to it. The document is easy to follow, and I cannot offer any improvements. I have not identified any additional topics that are needed, and on behalf of the City of Ely Council I agree the proposals.	Comments noted.	No change to SPD
CLC-11	George Ginn Object	I would like to offer some contribution to your consultation. I have read some of your concerns and proposals, and from that I gather that you do have real understanding of what we are all facing in the battle of climate change. I agree with what you have put down about the problem and the things we can all do to combat this real and growing threat of climate change. I disagree with your reluctance to promote the erecting of wind turbines, simply for their visual appearance. We have a Climate Emergency and beggars can't be choosers. I am not an expert but I have gained a lot of knowledge through six books that I have. I find myself disappointed with our leaders here and around the world, they talk up about Climate Change, I think mainly to get people on side, and also regard it as something that is distant and does not	Comments noted, and express clearly some of the key issues and challenges we face. In response to some specific points: In relation to wind turbines, wind turbines can only be approved if they are proposed on sites allocated in a Local Plan (sometimes referred as a Development Plan Document (DPD)) or Neighbourhood Plan. As an SPD, this document cannot lawfully allocate sites for wind turbine development. As	No change to SPD

	<p>require urgent and radical action now. All they seem to offer is setting targets of Net Zero Carbon emissions by 2050. Most people might be taken in by that, but we can never get to zero emissions because we all breathe CO2. The get out is in the word net and in an acrostic it reads Not Exactly True. The idea is that where we can't reduce our emissions we offset them in some way by carbon capture so making a kind of balance. There are several ideas put forward to reduce and eliminate emissions and they are all welcome. But one of the biggest emitters is meat production. Meat does not grow on trees. It has to be born, bred, fed, slaughtered and transported. Every aspect of this process is causing emissions and not only CO 2 but Methane and Nitrous Oxide which are far more potent. It also takes up large acres of land and uses vast quantities of water. And we need much more of this to feed a growing population if they still want meat in their diet. It may seem impossible for the majority to change their diets but there is a move towards Plant Based Food that resembles and taste like meat and at the same time is a healthier outcome. But meat production is hardly mentioned in the various ways of tackling climate change. I don't know if people realise that we never pay the true price of the meat we buy or the meals we have in restaurants, because of the heavy subsidy the producers receive. I did read that they get £250,000 and some of largest get up to £1 million and the EU was trying to keep it down to £250,000. In essence governments claiming they are taking measure to combat climate change are simply fuelling it.</p> <p>My first book that I had was entitled "Climate Change, what everyone needs to know" by Joseph Romm who was an American whose second edition was published in 2018, the first in 2016.</p> <p>The opening words in the preface are worth quoting. "Climate Change will have a bigger impact on your family and all of humanity than all the internet has had. Imagine if you knew a quarter-century ago how information technology and the internet were going to revolutionise so many aspects of life. Imagine how valuable that knowledge would have been to you and your family. It turns out that we have such advanced knowledge of hoe climate change will play out over the next quarter-century and beyond. And the purpose of this book is to provide you with this knowledge".</p>	<p>there are no sites allocated for wind turbines in the current Local Plan (2015), and to date no Neighbourhood Plan identifies any sites for wind turbine development, no wind turbine proposal (other than small scale 'domestic size') can be given planning permission in the District. We are monitoring any national policy shift on this matter.</p> <p>ECDC agree that the challenges faced are significant and warrant action from various bodies and organisations, and all individuals. Unfortunately, as an SPD (i.e. not a full Local Plan), the scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria.</p>	
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	<p>He himself had been involved with various technologies aimed at combating the effects of climate change</p> <p>Another book, entitled “The decade we could have stopped climate change, losing earth” by Nathaniel Rich. Another American writer. The decade was 1979-1989. It said by 1979, we understood nearly everything we know today about climate change – including how to stop it. Over the next decade, a handful of scientists, politicians, and strategists, led by two unlikely heroes, risked their careers in a desperate, escalating campaign to convince the world to act before it was too late. Losing Earth was their story and ours. For a decade between 1979-1989 we had an excellent chance. The world’s major powers came within several signatures of endorsing a binding framework to reduce carbon emissions. What happened? The fossil fuel industry took a stand and spent vast sums of money to defeat climate change legislation. Over the years it is vested interests that have stopped any real global action taking place. All we have is conferences from time to time with nothing really moving forward allow countries have signed up to targets. America one of the greatest polluters has pulled out of the Paris accord and has gone back to coal mining. Australia not only continues with coal but exports it as well. Other books I have read not only point out the real threat of climate change but give great detail about why it is happening and how we can takes the right actions to deal with it. They are; “Don’t even think about it, why our brains are wired to ignore climate change” by George Marshall, “There is no Planet B, a handbook for the make or break years” by Mike Berners-Less, “How we are messing up our planet, and what we can do about it” Tony Jasper, “This is not a drill, an excellent Extinction handbook” by various authors. I also have the small booklet by Greta Thornburg a collection of her speeches she has made around the world at big gatherings. The most amusing was the one to our parliament, where on three occasions she asked if her microphone was switched on, implying her listeners were not taking her seriously in what she was telling them. I have also just finished the book by David Attenborough, “A life on our planet”. In it he clearly explains how we have arrived at climate change by our human activity by destroying biodiversity and the animal kingdom, which we rely on for our very existence. He paints a bleak picture if we do nothing, but he comes up with a lot of good ideas about the actions we take to</p>		
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	<p>reverse what is happening and presents ways in which we can get back to ways that are sustainable. And this is key, we have got to stop this ongoing strive for more and more growth and learn to live and work in which are sustainable. This book is a must for all who are truly endeavouring to deal with climate change. In much of our talk about climate change it is something it seems that we think about it now and do something later. But it is climate emergency and we must act now. The question of getting petrol and diesel vehicles off our roads as soon as possible for the twofold reason of emissions and harmful pollution that is attributable for 40,000 deaths per year. The has been kicked in the long grass first of all till 2040, but has been brought forward to 2030. But it is not what it seems, although I consider 2030 is still too late, it is not even in 2030 the time when these vehicles are off our roads, they will still be there long after 2040 and even 2050. I imagine without any government intervention the car makers will make as many as possible in 2029 and these will still be sold into 2030 and beyond. There needs to be a concentration now on electric vehicles like a war effort to get as many built as quickly as possible and charging points readily available everywhere. In other areas of action we need to plant as many trees as we can to absorb carbon, every building apart from the usual green spaces should plant a number of trees, at least one for each house. Although it is out of the districts remit to stop deforestation strong messages should go out to stop the felling of trees in the great forests of the world because this accelerates climate change. I am sorry this contribution is late but I hope it conveys the message that there is not is not too much we should be doing immediately to combat the change that is already with us. If it prevails in a short space of time Ely could become an island once again. I have produced a separate attachment about 2030 and vehicles</p>		
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CLC-12	George Ginn Observation	<p>It has been said that a third of all our emissions of greenhouse gases, come from transport and not only that but our petrol and diesel vehicles produce pollution that is attributable to 40,000 deaths a year. So for a twofold reason it is necessary to ban these vehicles as soon as we possibly can. During this pandemic governments of all countries have issued strong, clear and unpopular rules in order to try and combat Covid 19. But in the case of banning these emission and polluting vehicles our government have not set out a clear plan to achieve this. All they have said is that the sale of these current vehicles will be banned, first in 2040 and now brought forward to 2030. This in my opinion is still too late, but this statement given is so misleading and hides the truth. Car manufacturers can produce a record number of cars in 2029 which will still be sold and be on our roads long after 2030. What the government needs to do is to reduce the quantity of these vehicles from now on and get the manufacturers to begin producing more electric vehicles and increasing charging points. Instead of offering the vague statement of banning the sale of these vehicles from 2030, they should declare a strong and clear order that none of these vehicles will still be on our roads creating emissions and polluting our environment. Manufacturers should be given a time to stop building these vehicles as soon as possible and second-hand car sales should cease in 2030 for these older vehicles. Otherwise it will not achieve the object this vague statement seems to imply.</p>	<p>Comments noted. In response:</p> <p>In relation to vehicle emission, it is beyond the scope of this SPD to impose serious reforms and restrictions on vehicles and emissions: such action needs to come from Central Government and industry.</p>	No change to SPD
CLC-13	East Cambs CAN Object	<p>This is a response to the Climate SPD on behalf of East Cambs Climate Action Network; a group of local residents with professional experience relevant to efforts to achieve Net-Zero Carbon emissions in the district. Our members include architects, ecologists, energy efficiency professionals and people from other relevant backgrounds. Overall, we support the SPD, but in our opinion the SDP could be made a more powerful tool by referring to specific standards, tools and processes, many of which are already available. This would strengthen the requirements for new developments and renovation projects to ensure compliance with the stated net-zero greenhouse gas emissions by 2050 target. Below, we provide some constructive criticism of the SPD with a view to helping the council make it as useful as possible in helping the district achieve the net-zero target and comply with the council's stated goals on biodiversity. We do not</p>	<p>Comments noted. In response:</p> <p>In relation to the suggestion that the SPD could be made a more powerful tool by referring to specific standards, tools and processes, unfortunately, as a Supplementary Planning Document (i.e. not a Local Plan), the scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria.</p>	No change to SPD

		consider the measures specified to be compatible with the declaration of a climate emergency and we would urge the council to be as ambitious as is within its power and work with businesses and other levels of government to make the necessary changes to planning required to meet the scale of the challenge. In turn this will create significant economic benefits to the local economy.		
CLC-14	East Cambs CAN Para 3.1 Object	Policy Review • The policy review cites the climate change act 2008 but does not refer to the 2019 amendment which changed the stated greenhouse gas target from 80% reduction by 2050 to net-zero emissions by 2050. This should be corrected.	Agreed. Thank you for pointing out this omission	Para 3.1 amended to reflect this comment
CLC-15	East Cambs CAN CC1 Object	CC1: Reducing carbon dioxide emissions - Sustainability statement This section seeks to encourage more developers to submit sustainability statements with their applications to show how proposed developments meet policy ENV4, and lists out what such a statement should include. We support this suggestion as it will encourage developers to consider sustainability at an earlier stage. However, the wording used - eg. 'minimise demand'; 'maximise efficiency' - is imprecise, and sustainability statements can easily be worded that appear to address the issues while in reality not going beyond the legislated requirements. To strengthen this section, we suggest that a life cycle assessment of both operational and embodied carbon is included as a topic within the sustainability statement. This would provide the planning authority with impartial, hard, comparable data, enabling them to come to decisions based on an objective understanding of a proposal's environmental impact. By starting to use life cycle assessments, both developers and planning officers will become more familiar with the figures involved. This section should also refer to recent research published by LETI and the RIBA, setting target figures for Net Zero operational and embodied carbon for different building typologies. (RIBA, 2019, 2030 Challenge; LETI, 2019, Climate Emergency Design Guide, Embodied Carbon Primer, and Archetype Pages). The inclusion of these figures would provide developers and planners with objective figures for the requirement of Policy ENV 4 for "reduced or zero carbon development".	Comments noted. In principle, the suggestions made are supported. However, national policy and legislation does not presently allow for such requirements to be made of developers, particularly as this is only a SPD rather than a Local Plan. The scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria As national policy and legislation evolves, the measures suggested are the sorts of matters we would like to introduce in the future.	No change to SPD
CLC-16	East Cambs CAN CC2	This section relies on EPC's as a measure of existing energy efficiency and improvements. There are two issues with this approach:	Comments noted. In response, it is acknowledged that there is an industry wide issue in terms of forecast performance (EPC) and	Amend section 5 supporting text, and

	Object	<ul style="list-style-type: none"> • Firstly, a number of reports have shown that EPCs are largely inaccurate as a measure of the actual energy use of the buildings (Jones Lang LaSalle (2012) A Tale of Two buildings. Are EPCs a true indicator of energy efficiency?; Nirushika Nagarajah, N and Davis, JJ (2019) Impacts of Inaccurate Area Measurement on EPC Rating) • Secondly, the SPD simply states that an improvement in the EPC level is sufficient to allow the proposed work to be supported. In order to reach Net Zero, significant retrofit of all our existing, inefficient building stock is required. Therefore asking for a simple improvement is not sufficient for meeting Net Zero. Incremental changes leading to small improvements can be problematic as they often make future improvements much more difficult to carry out <p>We recognise that at this time, and in particular through an SPD, the Council cannot require specific targets of retrofit projects. However, section CC2 could refer to and offer guidance on how to follow PAS 2035, which sets out a process for evaluating the work required to a building and planning this in such a way that each stage does not prevent further work.</p> <p>Outside the scope of this consultation, we would strongly support community retrofit schemes, for example helping residents to work together to share the cost and hassle of upgrading their properties; and supporting them to access funding such as the current Green Homes Grant.</p> <p>There should be more on retrofit, community schemes, helping homes utilise the green homes grants (and future replacement schemes) especially in Conservation Areas and listed buildings as the timetable for implementation is so short - getting permission in time and doing the work is nearly impossible.</p> <ul style="list-style-type: none"> • Often not enough time to submit a well-thought out scheme and get permission before deadlines to apply for grants. • Council should support local building professionals by providing financial incentives for them to get certified for energy efficiency grant schemes and train up retrofit coordinators. • Current schemes often cut out smaller contractors, will the council commit to helping local contractors acquire the certification required to qualify for government grants for energy efficiency measures or find alternative solutions such as the use of independent inspectors who 	<p>actual performance of buildings. The Council supports national measures trying to close the gap between forecast and actual performance, through training, monitoring and enforcement.</p> <p>However, in the short term, EPC assessment is a standardised, nationally recognised form of assessment and so is a useful tool.</p> <p>Furthermore, the planning system is very limited in what it can do in terms of the existing housing stock and retrofit.</p> <p>However, we welcome the suggestion regarding PAS 2035, and have included such reference in section 5 and policy CC2 (albeit we are not able to 'require' PAS 2035 to be used).</p> <p>Of the wider points made, these are noted and agreed, and the Council has taken what opportunities it can to promote available grants, and is in the process of bidding for grants which itself can spend on its own buildings or on more vulnerable households.</p>	<p>policy CC2, to encourage use of PAS 2035 guidance and specifications</p>
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		<p>could provide the certification requirements for contractors to qualify for these schemes. This is a major barrier to the uptake of these schemes.</p> <ul style="list-style-type: none"> • Will the council commit to feeding back to other levels of government about the required changes to any future energy efficiency grant schemes? 		
CLC-17	East Cambs CAN Section 6 Object	<p>Any new public development should reach Zero Carbon Targets. Still today there are little discussions about alternative sites and/or re-utilisation of existing buildings. In terms of energy efficiency this is often a financial decision.</p> <ul style="list-style-type: none"> • Can the SDP be more specific and require an assessment or a feasibility study on alternatives before a site for development is chosen? • The local plan does not appear to consider repurposing of existing buildings and there is a lack of information to guide developers to more climate friendly and resilient projects. • There is an urgent need to bring considerations of climate, sustainability, resilience and ecology forward in the planning stage in terms of identifying sites for development or redevelopment. Often by the time a site is selected many of the ecological impacts are locked in as mitigation can only achieve so much in terms of reducing the biodiversity impact of poorly sited developments. • More information about site selection needs to be passed on to architects and developers so they can do a better job of meeting the requirements of the site. 	<p>Comments noted. In response: Unfortunately, the SPD cannot be 'more specific', given its status as SPD and not a Local Plan.</p> <p>In relation to existing buildings, planning on the whole is limited in what it can do in terms of existing buildings and retrofit: planning can only have an impact in situations where planning permission is sought, and planning permission is not always required for changes to existing buildings (indeed, government is increasingly allowing change of use of buildings without the need for permission at all).</p> <p>In terms of site selection, this is noted and a matter for any future Local Plan, but the principles stated are agreed.</p>	No change to SPD
CLC-18	East Cambs CAN Section 6 Object	<ul style="list-style-type: none"> • The council should encourage all businesses and council owned buildings with large roof surfaces to install solar panels. Other local authorities such as the City of Edinburgh council have had significant successes with community owned developments of this nature. • New developments should be future proofed to ensure they are compatible with projected developments in solar, hydrogen and electric charging point needs. 	<p>Comments noted.</p> <p>The Council does indeed encourage the installation of solar panels on roofs, but no doubt we could encourage more and this is the sort of matter we hope to take forward in our separate district wide Environment Plan (being prepared over 2021, with a Partnership Forum).</p>	No change to SPD

			In terms of new development, national policy and legislation does not presently allow for such requirements to be made of developers, particularly as this is only an SPD rather than a Local Plan. The scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria.	
CLC-19	East Cambs CAN Object	We recognise that the SPD is restricted in scope, as it can only support the existing local plan, not require stronger standards. It is encouraging to see East Cambs set out so clearly the importance of tackling the climate emergency in its introduction to the SPD, however it is also clear that the measures that are currently within the Local Plan are not sufficient to meet the Climate Change Act. Therefore, the Local Plan itself must be strengthened in order for East Cambs to meet its obligation under the NPPF to "take a proactive approach to mitigating and adapting to climate change... In line with the objectives and provisions of the Climate Change Act 2008". The SPD should clearly set out East Cambs direction of travel, with their ambitions for the next local plan, in order to give developers the ability to plan ahead and take future requirements into account.	<p>The Council agrees with your summary of the limitations of an SPD.</p> <p>In terms of a new Local Plan, in Oct 2020 the Council decided not to proceed with a full Local Plan review, but instead prepare a very limited partial update of the 2015 Local Plan, relating exclusively to housing target requirements. A comprehensive new Local Plan is not likely to commence preparation until clarity on the Planning White Paper (and the separate Environment Bill and Energy Strategy white paper, as well as imminent Building Regulation amendments) has emerged. In the meantime, this emerging Climate Change SPD intends to act as a temporary bridge between the policies of the 2015 Local Plan and the policies of that future Local Plan (which could, as suggested, embed further strengthened policies on climate and wider environment, if national policy allows).</p>	No change to SPD

CLC-20	East Cambs CAN Object	<p>Need to re-assess the Local Plan.</p> <ul style="list-style-type: none"> • Green infrastructure is an interesting topic – the SPD does not properly address the role of development and design of housing schemes in car dependency. We need to ensure that considerations concerning active travel, micro-mobility, electric charging points, access to public transport and the provision of local amenities within walking distance are vital to ensuring development does not lock in higher transport emissions. • Car-dependency also discriminates against those from disadvantaged backgrounds. Cars are expensive to run whereas bicycles and ebikes can provide safe, cheap and convenient transport when sufficient infrastructure is in place to facilitate this. • Commuting to Cambridge from Ely is impossible by bike when the land is overall levelled (fens!) and in Holland, this distance would be absolutely normal to cycle at any age with a safe infrastructure in place. Connecting small villages through a green safe and usable cycle network should be a priority for the next five years. • Planning authorities play an important role in driving action on climate change or exacerbating it. Together with developers, they are making extremely important and significant decisions every day which affect everyone and lock in greenhouse gas emission pathways for many years and decades. • All new homes and new public buildings should be built to a Zero Carbon standard regardless of size and economical reason and the local plan reviewed to make this mandatory if necessary. Other local authorities have done this already and demonstrated the additional cost to developers to be negligible. • The SPD could achieve some of its stated aims using existing tools and providing incentives for achieving best practice (RIBA, 2019, 2030 Challenge; LETI, 2019, Climate Emergency Design Guide, Embodied Carbon Primer, and Archetype Pages). in order to achieve the Net Zero targets. • We must put these measures in place in the coming months, the urgency of the climate emergency means that now is not the time for baby steps, particularly when the solutions are already at hand. 	<p>Comments noted. In response: Regarding the need to review the Local Plan, see response to comment CLC-19 above. Regarding the need to consider car dependency, spatial planning is done through the Local Plan, and there are several Local Plan policies aimed at delivering sustainable development, including Policy GROWTH 2: Locational strategy; Policy GROWTH 4: Delivery of growth; and Policy COM 7: Transport impact. Regarding the cycle network, please refer to the Council's Environment Plan.</p>	No change to SPD
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CLC-21	Extinction Rebellion Ely Object	This document is very much Business as Usual for the Tory controlled administration of East Cambs District Council, it lacks vision, it lacks ambition, it lacks imagination, it adds very little new material to pre-existing documentation and will certainly not help ECDC reach its stated carbon neutral target by 2050, which in itself is 20 years too late.	Comments noted. Unfortunately, national policy and legislation means the scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria. The issue of carbon emission targets is a matter subject to consideration of the Operational Services Committee.	No change to SPD
CLC-22	Extinction Rebellion Ely Section 1 Object	In the introduction it would probably be a good idea to explain the difference between a SPD and a PDP and how they sit with the local plan and NPPF and NPPG, instead of leaving this to later sections, by which time it has all got very confused.	Agreed.	Former paragraphs 3.9 to 3.11 moved to after paragraph 1.9
CLC-23	Extinction Rebellion Ely Para 1.5 Object	Why should the council make "special efforts to seek the views of key relevant bodies and organisations, as well as developers and agents on the Council's 'agent's forum'"? Who is a member of the agents forum? I can find no list on the ECDC web site. When consulting with people or organisations that have a vested interest in maintaining the status quo, such as developers and agents, their comments will be fairly predictably against introducing measures beneficial to the local environment and ecosystems if it looks like causing them more work. Therefore, comments from people or organisations with vested interests should have a weighting factor applied to them.	All comments received, whether from environment based lobby groups or developer interests, are treated equally and fairly. No organisation or individual is treated with greater or lesser weight. All organisations and individuals on our planning policy consultation database were consulted, and anyone can be added to that database.	No change to SPD
CLC-24	Extinction Rebellion Ely Para 2.2 Object	Section 2.2 references the UN IPCC SR15 report, issued October 2018, but fails to mention that this report said we only have 10 to 12 years remaining to take significant action if we are to prevent catastrophic climate collapse and runaway global heating that was 2 years ago so now we only have 8 to 10 years left, this doesn't sit very	Comments noted The issue of carbon emission targets is a matter subject to consideration of the Operational Services Committee.	No change to SPD

		comfortably with ECDC climate emergency declaration date of 2050 does it?		
CLC-25	Extinction Rebellion Ely Para 2.3 Object	Section 2.3 delete words, “if, as some suspect” there is no question that peat drying out releases CO2 into the atmosphere this is just basic science and doesn't actually need investigation by the combined authority	Agreed, in terms of removing that phrase (though the retention of the word ‘if’ is required) However, the investigations being made by the CA relates to the degree of carbon remaining in the peat soils, and the best ways to preserve what is remaining (and reverse losses). This is critical research.	Words ‘, as some suspect’ deleted
CLC-26	Extinction Rebellion Ely Para 2.4 Object	Section 2.4 not sure what the point trying to be made here is, ok there are large scale solar farms in the district (some would argue too many especially when they're on prime “blacktop” agricultural land) but what we don't have is any on-shore wind, the carbon footprint of onshore wind is 2/3 that of solar farms and doesn't prevent the land being used productively for food growing.	Comment noted.	No change to SPD
CLC-27	Extinction Rebellion Ely Para 2.5 Object	Section 2.5 suggested Cambridgeshire and East Cambs are growing areas. What is the evidence base for this? I can find none, other than unsubstantiated statements by the local authorities resulting from central government mandates, again unsubstantiated. This requirement for growth needs to be urgently reassessed in the light of, 1. “Brexit” 2. The pandemic and 3. Climate Collapse and the resulting large sea level rises which will inundate most of the district. There also seems to be an assumption that growth will have adverse impact on the climate, this isn't necessarily true and indeed isn't this the whole point of this SPD to ensure that we can have some “sustainable growth” without negatively impacting the climate! Local authority responsibility should also extend to outsourced operations like “Street Works” and “Palace Homes”. Palace Homes in particular should come under the umbrella of the ECDC climate emergency declaration and climate change strategy. As suggested by this section.	Comments noted. In response, the level of growth for East Cambridgeshire is set by national policy, based on ONS forecasts, affordability and national ambitions relating to house building. It is agreed that growth can have a positive effect on the environment. The Council already incorporate emissions arising from its contracted out services, in line with national and international accounting Greenhouse Gas Protocols – see the Council’s Environment Plan of June 2020.	No change to SPD

			Palace Green Homes is treated differently because it is not a 'contracted out' service as such (unlike, say, waste collection).	
CLC-28	Extinction Rebellion Ely Para 3.3 Object	Section 3.3 extracts from the NPPF; all of the cited extracts form an excellent framework for a low carbon future, unfortunately there seems to be no evidence of ECDC planning policy in any way following the guidance given in the NPPF 2019, why is this guidance not being followed?	Unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan, and cannot add additional burden or new or revised policy criteria. We appreciate that the Local Plan (2015) was prepared before the latest NPPF revisions. While the Local Plan remains the starting point for decision making, where the plan is absent, silent or relevant policies are out of date, decisions are taken after an assessment against the policies in the NPPF taken as a whole. Thus, the NPPF is being followed already.	No change to SPD
CLC-29	Extinction Rebellion Ely Para 3.4 Object	Section 3.4 extracts from NPPG; there would not seem to be any evidence of ECDC adopting any of the guidance set out in this national policy, why not?	See response to CLC-28 above.	No change to SPD
CLC-30	Extinction Rebellion Ely Para 3.7 Object	Section 3.7 the NPPG defines what local planning authorities can do in terms of exceeding Energy Performance standards. The first bullet refers to "level 4 of the Code for Sustainable Homes". This code was withdrawn in April 2015 and hasn't been replaced with an equivalent standard, can we then say that this SPG will enable energy performance standards for new housing (or adaptation of buildings for dwellings) to set a standard of Passivhaus in view of there being no equivalent UK standard? Or BREEAM standard "excellent"? In the absence of a formal standard this SPD would be an ideal opportunity	Any standards (or 'burdens') above national policy or legislation can only be set in a Local Plan. Unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan, and cannot add additional burden or new or revised policy criteria.	Adjust supporting text before Policy CC1, and slightly adjust Policy CC1 itself, so as to be clear

		for ECDC to really take some initiative and set its own. Remember NPPG is guidance, ECDC can choose to apply higher standards if the political will and ambition exists.	<p>The current Local Plan already seeks the equivalence of Code for Sustainable Homes Level 4, so is consistent with the maximum permitted by national policy and guidance. The SPD can not go further. Passivhaus standard is not equivalent to Code Level 4, and therefore is not a reasonable substitute (in terms of compliance with national policy and guidance).</p> <p>However, on reflection, we think the supporting text of Policy CC1 could be clearer in terms of latest national position in terms of code for sustainable homes, as well as slight re-wording of the policy itself. We also think the policy could usefully encourage passivhaus standards.</p>	<p>in respect of requirement in relation to Code 4 of sustainable homes.</p> <p>Policy also boosted by encouraging passivhaus standard</p>
CLC-31	Extinction Rebellion Ely Para 3.8 Observation	Section 3.8 may mean something to local authority planners but means little or nothing to anybody else. I don't understand or recognise the difference between an SPD and a DPD, this is pointless and deliberately confusing jargon.	<p>It is agreed that the planning framework of England is complicated and confusing, though the SPD attempts to explain some of the differences the best it can. Government intends to simplify the system, via the recent Planning White Paper. In the meantime, further clarity on terminology can be found in the NPPF glossary.</p>	Section 1 (and elsewhere) redrafted to help explain the difference between the types of policy documents.
CLC-32	Extinction Rebellion Ely Para 3.9	Section 3.9 explain the use of the term "burden"?	In this context, the term 'burden' is used to mean a requirement that will have financial, time or resource implications for those applying for or	No change to SPD

	Observation		<p>implementing a planning permission. It comes from NPPG advice (61-008-20190315), as follows:</p> <p>“Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial <u>burdens</u> on development.”</p>	
CLC-33	Extinction Rebellion Ely Para 3.10 Object	Section 3.10 What is the point of this section? Not only is it gibberish it is also not true. On 3 rd March 2020 BEIS announced it's renewed support for onshore wind development.	<p>While the Department for Business, Energy and Industrial Strategy (BEIS) announced that it will allow onshore wind projects to compete for subsidy support, National Planning Policy (which falls under MHCLG Department) still places significant restriction on the development of wind turbines.</p> <p>National policy states (NPPF para 154, footnote): <i>Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local</i></p>	No change to SPD

			<i>community have been fully addressed and the proposal has their backing.</i> As an SPD, this plan cannot allocate sites for wind turbine development. As there are no sites allocated for wind turbines in the current Local Plan (2015), and to date no Neighbourhood Plan identifies any sites for wind turbine development, no wind turbine proposal can be given planning permission in the District. Para 3.10 (now moved to 1.10) is, therefore, accurate.	
CLC-34	Extinction Rebellion Ely Paras 3.9-3.11 Object	Sections 3.9, 3.10 and 3.11 go to some lengths to explain that this SPD is actually pointless because it can't change anything that isn't already in the local plan (the latest version of which was rejected and the existing default version is 2015) this is a massive cop-out, so this document is saying that this document is a pointless waste of time?! Once again ECDC kicking the climate can down the road.	While the SPD is indeed restricted in what it can achieve, it is hoped that, by building upon the Environment and Climate Change section of the Local Plan, the SPD will assist applicants and decision makers in delivering the requirements set out in the Local Plan.	No change to SPD
CLC-35	Extinction Rebellion Ely Para 3.12 Object	Section 3.12 refers to the 2015 local plan, this local plan is out of date, it refers to biofuels and biomass as "renewable sources" they are not and are in many cases more carbon intensive than burning conventional fossil fuels.	The SPD cannot amend the Local Plan.	No change to SPD
CLC-36	Extinction Rebellion Ely Para 3.16 Object	Section 3.16: ok so sections 3.8 through to 3.11 tell us all of the things that an SPD can't do but a DPD can and that a DPD is part of the local plan only to then go on to say that this SPD will predominantly focus on providing additional guidance for the implementation of ENV4 in the local plan. This makes no sense whatsoever, perhaps we actually need a DPD to support ENV4 in the local plan?	A new Local Plan (or, to give its other legal name, a DPD) could attempt to go further than the present (2015) Local Plan. However, the Council has determined that a comprehensive new Local Plan is not likely to commence preparation until clarity on the Planning White Paper (and the separate Environment Bill and Energy Strategy white paper) has emerged. In the meantime, this Climate Change SPD intends to act as a temporary	No change to SPD

			bridge between the policies of the 2015 Local Plan and that future Local Plan.	
CLC-37	Extinction Rebellion Ely Para 4.1 Object	Section 4.1 states that local plan policy ENV4 sets out requirements for new developments over the threshold of 5 dwellings. No it doesn't, it begins by saying all proposals for new development without any number constraint. Why is there a number constraint anyway? The number constraint should be removed. All development should be carbon neutral as built now – this is the only way the ECDC can meet it's declared zero carbon date of 2050.	It is agreed that the opening paragraphs at 4.1 are not entirely reflective of Policy ENV4, and need correcting. The threshold of 5 dwellings is included in Policy ENV4, but only in relation to the code for sustainable homes. It is agreed that 'all development' is covered by other parts of ENV4, and therefore the reference to 5 dwellings in the supporting text needs clarifying. The SPD can not amend the Local Plan threshold.	Para 4.1-4.2 corrected
CLC-38	Extinction Rebellion Ely CC1 Object	Section 4.2 The re-written CC1 is below: Policy ENV4 states: <i>All proposals for new development should aim for reduced or zero carbon development in accordance with the zero carbon hierarchy: first maximising energy efficiency and then incorporating renewable or low carbon energy sources on-site as far as practicable.</i> And: <i>Applicants will be required to demonstrate that they have maximised all aspects of sustainable design and construction...</i> In order to demonstrate how this policy requirement is met, a Sustainability Statement will be submitted as part of the Design and Access Statement. The Sustainability Statement will detail the applicant's approach to meeting the Passivhaus standard or meeting or exceeding BREEAM "Outstanding" standard. Planning permission will not be considered if a Sustainability Statement is not submitted. Low and zero carbon energy networks Developers are encouraged to incorporate renewable / low carbon energy generation provision onsite, or connect into an existing nearby	Unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan, and cannot add new or revised policy criteria. The suggested text cannot, lawfully, be incorporated in the SPD.	No change to SPD

		<p>renewable, low or zero carbon energy generation network where they exist.</p> <p>Combined heat and power (CHP) – District Heating Scheme In the case of large-scale residential development and non-residential developments of 1000m sq or more, developers must consider the use of a District Heating Scheme, possibly Combined Heat and Power (CHP) generation, where the CHP system uses truly renewable sustainable energy sources or a network connection to an existing renewable CHP facility. However, the use of other technologies- for example solar photovoltaics or thermal systems, wind turbines, biomass heating, ground or air source heating (in place of a district heating scheme) – are also encouraged and may provide a better solution on a case by case basis.</p>		
CLC-39	<p>Extinction Rebellion Ely CC2 Object</p>	<p>Section 5.4 The re-written CC2 is below: CC2: Reducing energy demand in existing buildings For all development proposals which involve the change of use of a building, or an extension to an existing building, the applicant should take every opportunity to improve the energy efficiency of the entire building (including the original building, if being extended)*. Proposals which do not consider and take such viable opportunities will, in principle, not be supported. The new build part of any extended building will need to meet the same energy efficiency standards as detailed in CC1 above. The pre-existing part of an extended building should have its energy efficiency up-lifted to “best achievable” for its given age and build type. If the extension is 50% or greater of the pre-existing building then all “thermal elements” of the pre-existing building must meet the same efficiency as the new extension. (This statement is contained within Part L of the building regulations so is already a legal requirement) In particular, residential properties which, following an extension or conversion, will achieve an improved EPC rating overall will, in principle, be supported. In this instance, a pre-development EPC should be provided as part of the application, together with evidence as to how a completed development EPC is likely to be rated. <i>*Note: for any heritage asset, any improvements to the energy efficiency of that asset must not cause harm to, or loss of, the</i></p>	<p>See response to CLC-38 above.</p> <p>There is also no need to repeat anything set out in mandated Building Regulations.</p>	<p>No change to SPD</p>

		<i>significance of the asset. This may limit any feasible energy efficiency improvements.</i>		
CLC-40	Extinction Rebellion Ely Section 6 Observation	Section 6 seems generally to be a good thing, however, Section 6. 2 apparently suggests that properties built today are neither built to last nor fit for purpose! Surely not? It seems implicit in this section that properties should be built to the specifications contained within the rewritten CC1 above.	6.2 does not mean to imply that buildings are not built to last nor fit for purpose: rather, it highlights the importance of considering adaptability.	No change to SPD
CLC-41	Extinction Rebellion Ely CC3 Observation	Comments on CC3 talks about heat resilience. This is true, whilst at the same time the orientation of buildings should be done to maximise solar gain, thus reduce the need to heat from external sources, so solar gain versus solar shading needs to be carefully managed.	Comment noted, and agreed, and worthy of emphasising this point more in the SPD.	Additional point added to policy CC3, and second bullet amended to refer to excessive sunlight (in terms of where shading may be required)
CLC-42	Extinction Rebellion Ely CC3 Object	Comments on CC3 talks about adaptable design. The design and construction of all properties in the district should be to the specifications given in the rewritten CC1 above i.e. carbon neutral at build time. This is quite easily achievable using standard widely available building materials and techniques, it is not rocket science. To suggest a property is constructed today which is not carbon neutral at build time and will need subsequent adaptation is ludicrous. Anyone with any experience in the building and Allied trades knows that retrofitting to achieve carbon neutrality is difficult, expensive and rarely achievable. What is the point in building anything now that cannot meet ECDCs 2050 carbon neutrality stated objective?	Unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan, and cannot add a new burden or new or revised policy criteria.	No change to SPD
CLC-43	House Builders Federation	Thank you for consulting the Home Builders Federation (HBF) on the above supplementary planning document (SPD). The HBF is the principal representative body of the housebuilding industry in England	Comments noted	No change to SPD

	Observation	and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.		
CLC-44	House Builders Federation Object	Our key concern with the SPD is that the Council are clearly seeking to introduce policies that were to be included in the local plan that was withdrawn by the Council. This is a wholly inappropriate, and unlawful, approach to the development and adoption of local planning policies. The relevant regulations are clear that SPDs cannot be used to introduce statements that are intended to guide the determination of planning applications. They are intended to provide guidance and clarity to those applying for planning permission rather than create additional burdens and confusion. If the Council wishes to introduce new policies, it should prepare a new local plan. Only through the legally required processes of preparing a local plan can new policies be scrutinised and examined effectively to ensure they are sound. Before considering our specific concerns with the SPD we have set out, for the benefit of the Council, the legal framework relating to what is considered to be a policy and the distinction between the local plan and supplementary guidance.	Disagree that SPDs cannot be used to guide the determination of planning applications. NPPG explicitly states: “What is the role of supplementary planning documents?”They are...a material consideration in decision-making.” Ref: 61-008-20190315 By definition, if they are a material consideration, then they can guide the determination of planning applications (though it is accepted that SPDs are highly unlikely to be the determining or most important document to reach a decision – they can only be a ‘material consideration’, post consideration of Local Plan policies). The Council is well aware of the legal framework of plan making, including SPDs, and respectfully points the HBF to Reg 8(3) of the The Town and Country Planning (Local Planning) (England) Regulations 2012 which states: “Any policies contained in a supplementary planning document must not conflict with the adopted development plan” The above therefore establishes that SPDs can include ‘policies’ but that	Adjustments made where any doubt arises from what is ‘required’ and what is ‘encouraged’.

			<p>such policies must not conflict with those in a Local Plan. National policy explains a little more what is meant by 'conflict' and refers to matters such as 'burdens'.</p> <p>The SPD, therefore, intends to build upon policies in the adopted Local Plan. The SPD does not set out additional requirements, but rather sets out, for example, how applicants <i>could</i> demonstrate that their proposal meet the requirements of the Local Plan policies.</p> <p>Where the SPD introduces something new, or additional to, the Local Plan, it does so only by 'encouraging' such matters, rather than 'requiring' them. In doing so, it is entirely consistent with national law and policy. However, a thorough review of the draft SPD has been done, and if there was any doubt on this clarity, then some adjusted wording has been included.</p> <p>More generally, it is disappointing, when reading the representations as a whole from the body representing builders of 80% of all homes built in England, that no constructive positive changes to the SPD are offered, or even acknowledgement that house builders have a vital role at mitigating climate change and building homes that are capable of adapting to it. Instead only representations are offered seeking the council to, in</p>	
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			effect, abandon the SPD (or dilute it to be of no consequence).	
CLC-45	House Builders Federation General Object	<p>The relevant legislation defining the difference between Local Plans and SPDs is the Town and Country Planning Regulations (2012). This defines an SPD in regulation 2 as “any document of a description referred to in regulation 5 (except and adopted policies map or statement of community involvement) which is not a local plan.”</p> <p>Therefore, it can be concluded, as stated above, that whilst SPDs are Local Development Documents they are not local plans. It is also important to note that regulation 2 defines the local plan as: “any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b), and for the purposes of section 17(7)(a) of the Act these documents are prescribed as development plan document”</p> <p>Regulation 5 in turn states: 5(1) For the purposes of section 17(7)(za)(1) of the Act the documents which are to be prepared as local development documents are— (a)any document prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding one or more of the following— (i)the development and use of land which the local planning authority wish to encourage during any specified period; (ii)the allocation of sites for a particular type of development or use; (iii)any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and (iv)development management and site allocation policies, which are intended to guide the determination of applications for planning permission;</p> <p>Taken together these regulations mean that a local plan is a document that contains statements as to the:</p> <ul style="list-style-type: none"> • development and use of land which the local planning authority wish to encourage during any specified period; • allocation of sites for a particular type of development or use; and • development management and site allocation policies, which are intended to guide the determination of applications for planning permission. <p>Therefore, any element of the SPD considered to be development management policies which are intended to guide the determination of</p>	See response CLC-44 above	See change above

		<p>applications for planning permission should be deleted. Such policies can only be adopted in a local plan following the prescribed process and their adoption through SPD without the need for examination in public is wholly inappropriate. This issue was explored in detail in the recent High Court Judgement between William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd & Barwood Homes Ltd and Charnwood Borough Council. In this case Justice Gilbart quashed the SPD on the grounds that it contained policies that should have been contained in the local plan because they could be considered to fall under regulation 5(1)(a)(i) and 5(1)(a)(iv). However, this important legal distinction between the local plan and supplementary guidance, and their respective roles, does not seem to have been fully recognised by the Council as it has included policies from the local plan in the SPD, such as those set out in CC3. This must be rectified prior to adoption through the deletion of these policies. We would also suggest that more detail is provided as to the legal status of an SPD in planning policy. At present the Council state they are a material consideration but fail to clearly outline their legal status as guidance and not policy. This would ensure that decision makers and the general public are clear as to the role of the SPD.</p>		
CLC-46	House Builders Federation CC1 Object	<p>The Council must be clearer as to the policy framework surrounding the optional technical standards and the Code for Sustainable Homes (CSH). Firstly, the Council must state that they cannot require the lower water consumption standard mentioned in part d. We recognise that the Council are suggesting that the developer could outline in their sustainability statement whether they are voluntarily applying the higher standard but it is important that the full picture regarding the optional technical standards is noted to ensure that decision makers do not seek to require this standard. The SPD must clearly state that this is an optional technical standard and can only be adopted through the local plan. Secondly, the Council must refer to the Written Ministerial Statement from May 2015 which outlines that the only elements of the CSH that should be applied relate to energy performance standards. At present the SPD makes no reference to this distinction and as such could lead to unnecessary confusion and poor decision making.</p>	<p>ECDC feel that the wording of the guidance is clear that delivering lower water consumption is voluntary. The specific wording is ‘...the design intends to voluntarily incorporate...’. Comments noted in relation to Code for Sustainable Homes, and some word changes to add clarity on this matter.</p>	<p>Section 4 paragraphs and Policy amended to provide clarity on Code for Sustainable Homes.</p>

CLC-47	House Builders Federation CC3 Object	We would consider this to be a policy as it sets out requirements for development that will be used to determine planning applications. Elements of the text of CC3 have been directly lifted from the withdrawn local plan. For example, the first paragraph under adaptable design have been taken directly from part c of policy LP22 in the withdrawn local plan. The Council have tried to link this supposed guidance to policy ENV4 in the local plan but given that this policy is entitled energy and water efficiency there would seem to be little relating it to the elements in CC3 on adaptable design and heat resilience. The Council are clearly trying to shoehorn a policy from the withdrawn local plan into the SPD and as such CC3 should be deleted.	Comments noted. Whilst it is disappointing the body representing over 80% of all homes built in the UK appears to want to resist delivering homes which are resilient and adaptable to a changing climate (or at best, want the Council to have no policy or position on this important matter), it is accepted that this policy could benefit from a slight adjustment to clarify that the measures set out in the policy are only encouraged, rather than strict policy requirements. The Council hopes the HBF, and house builders generally, will respond positively to such encouragement.	Wording of the SPD policy CC3 has been amended, where appropriate, to make it clear where matters are only to encourage applicants to consider the various considerations listed.
CLC-48	House Builders Federation General Object	Finally, we are concerned that the general layout of the document is one that is more akin to a policy document rather than one offering guidance. This is largely due to the Council having chosen to incorporate what look like policies within the SPD. Whilst these have not been labelled as policies, we are concerned that councillors making decisions at planning committees will treat them as such and expect to see them included within applications. On a similar note we are concerned that they may be seen as requirements by local residents who then object to preapplications that do not contain such provisions. SPDs should provide a useful guide to applicants and it is important that they are not seen as a policy document. At present this distinction is not sufficient within the draft SPD. Alongside a clear explanation as to the scope of such guidance, as suggested above, we would recommend that the Council refrain from using 'policy' boxes in its SPDs.	See response to CLC-44 above. The use of 'policies' and policy numbering in SPDs is common place and lawful, as confirmed in the plan making regulations.	See CLC-44 above
CLC-49	House Builders Federation General	It is important that a clear distinction between policy and guidance is maintained. SPDs that blur the boundaries between policy and guidance are not helpful to either applicants or decision makers. At present this SPD not only blurs the boundary between what is and is	See response to CLC-44 above.	See response to CLC-44.

	Object	not policy it also places new requirements on development. This is wholly inappropriate. If the Council wishes to adopt new policy measures it should do so through a review of its local plan and not through SPD. As we outlined at the start of this response it is important that policies that will be used to determine planning applications are properly considered through the examination of a local plan. Only through appropriate scrutiny can it be determined that such policies are sound.		
CLC-50	Pigeon Investment Management Limited Observation	<p>Pigeon Investment Management Limited (Pigeon) is a private company operated by a board of directors and a team of professionals from the built environment who each bring considerable experience of delivering high quality schemes in the East of England. Pigeon is working with a number of landowners across East Cambridgeshire and the East of England to deliver high quality schemes ranging from larger sustainable urban extensions through to smaller sustainable residential and mixed-use schemes as well as renewable energy and associated infrastructure.</p> <p>Pigeon welcome this consultation and hope that the Council will find the comments of assistance. Comments are provided both in relation to general matters and in direct response to individual paragraphs and policies in the draft SPD. We set out below in turn our comments in relation to the consultation document</p>	Comments noted	No change to SPD
CLC-51	Pigeon Investment Management Limited Observation	<p>The Climate Change SPD seeks to set out further guidance and advice in relation to how development proposals should respond to Climate Change and which is intended to build on policies within the East Cambridgeshire Local Plan (2015) and in response to the Council's declaration of a Climate Emergency in October 2019.</p> <p>Pigeon welcome the overall intention of the document and fully appreciate the need for all to take appropriate action in response to the climate emergency. Nonetheless, it is also important that the document is focussed on aiding the interpretation of existing Local Plan policies and does not go beyond its lawful remit by creating new policies. It is important that the SPD can be clearly interpreted and practically applied without undue adverse implications for the Council's requirements in respect of housing delivery for instance and to ensure that sustainable developments can come forward in a viable and deliverable manner. Given Pigeon's involvement in helping to deliver sustainable, planned development within the District, including</p>	<p>The Council welcomes the support for the 'overall intention of the document'.</p> <p>For other matters, see response to CLC-44 above.</p>	No change to SPD

		both new homes and renewable energy and related infrastructure we are keen to work with the Council to ensure an appropriate balance is secured and our comments should be taken in that context.		
CLC-52	Pigeon Investment Management Limited Object	A key concern is that the format of the document is one that is more akin to a policy document rather than one offering guidance. This is largely due to the Council having chosen to incorporate what look like policies within the SPD. Whilst these have not been labelled as policies, we are concerned that residents, or indeed councillors making decisions at planning committees will treat them as such and expect to see them included within applications. SPDs should provide a useful guide to applicants and it is important that they are not seen as a policy document. At present this distinction is not sufficient within the draft SPD. Alongside a clear explanation as to the scope of such guidance, as suggested above, we would recommend that the Council refrain from using 'policy' boxes in its SPDs. Conversely, we would suggest that the document provides practical examples of how the requirements of Policy ENV4 can be met and examples of best practice which are encouraged.	See response to CLC-44 above.	See response to CLC-44
CLC-53	Pigeon Investment Management Limited Object	We also have concerns that the draft SPD is seeking to introduce policies that go beyond the remit of policies within the Adopted Local Plan and which in some cases were to be included in the local plan that was withdrawn by the Council. This is an inappropriate, and unlawful, approach. The relevant regulations are clear that SPDs cannot be used to introduce statements that are intended to guide the determination of planning applications. They are intended to provide guidance and clarity to those applying for planning permission rather than create additional burdens and confusion. However, this important legal distinction between the local plan and supplementary guidance, and their respective roles, does not seem to have been fully recognised within the SPD as it has included policies from the withdrawn local plan in the SPD, such as those set out in draft Policy CC3. This should be rectified prior to adoption through the deletion of these policies. Indeed, given that the Adopted Local Plan is more than five years old and the inability of the SPD to introduce new policies to reflect the latest guidance and regulations, it is considered that the Council should prepare a full new local plan. This would ensure that the Council would be able to fully respond to its declaration of a Climate Emergency through a comprehensive	See response to CLC-44 above. In terms of a new Local Plan, see response at CLC-19	See response to CLC-44.

		approach towards planning for and managing sustainable growth. Only through the legally required processes of preparing a local plan can new policies be scrutinised and examined effectively to ensure they are sound.		
CLC-54	Pigeon Investment Management Limited Para 1.3 Object	As noted above, we have general concerns with the document incorporating new 'policies' as opposed to setting out guidance to aid interpretation of existing local plan policies. Notwithstanding these concerns we set out our detailed comments in respect of individual policies and paragraphs within the draft document in turn below. Paragraph 1.3 – We note the comments in respect of the purpose of the SPD. For the reasons set out above, further explanation should be provided in respect of the purpose of the SPD and the scope of the guidance. The relationship with other SPDs which also have a bearing on the Council's response to Climate Change, such as the Natural Environment DPD should also be acknowledged.	See response to CLC-44 above. Paragraphs 3.18 to 3.22 outline the other SPDs relevant to climate change and paragraph 3.17 briefly explains the relationship with the other SPDs.	See response to CLC-44. No further change to SPD.
CLC-55	Pigeon Investment Management Limited Para 1.7 Object	Paragraph 1.7 - The text should also acknowledge the need for the SPD to be reviewed regularly in order to ensure that the guidance takes account of, for example, new Government initiatives and legislative changes being brought forward, for instance through the Future Homes Standard. Paragraph 1.8 – Bearing in mind our comments above, we would also suggest that more detail is provided as to the legal status of an SPD in planning policy. At present the Council state they are a material consideration but fail to clearly outline their legal status as guidance and not policy. This would ensure that decision makers and the general public are clear as to the role of the SPD.	Agreed, in respect of para 1.7. As for comments in respect of para 1.8, the council agrees some slight rewording is beneficial, for clarity.	Paragraph 1.7 amended to include reference for the need to keep SPDs under review. Para 1.8 also slightly adjusted, for clarity on status and decision taking.
CLC-56	Pigeon Investment Management Limited Para 2.5 Object	Paragraph 2.5 – We note the comments in respect of the growth of the District and the increasing need for new homes, businesses and other supporting infrastructure. We fully agree with this observation. However, it is for this reason that the Council should undertake a full review of the Local Plan in order to ensure that sustainable growth can be achieved through an up-to-date and integrated suite of policies. Much has changed since the adoption of the Local Plan in 2015 and it	In terms of a new Local Plan, see response at CLC-19	No change to SPD

		is important that the Council has an up-to-date Local Plan in order to balance the need for growth with the growing pressures from climate change. This will ensure that growth can be accommodated in the most sustainable way.		
CLC-57	Pigeon Investment Management Limited Para 3.8-3.11 Object	Paragraph 3.8-3.11 – We note and agree with the comments in relation to the limited scope of the SPD given that it is not lawfully able to provide new policies. As noted above, despite this commentary it is considered that the draft SPD does not fully reflect this position as currently drafted and that the format of the SPD should be changed to focus more on explanation and guidance including practical examples to support the interpretation of the relevant policies within the Adopted Local Plan and relationship with other SPDs.	See response to CLC-44 above.	See response to CLC-44
CLC-58	Pigeon Investment Management Limited CC1 Object	Notwithstanding our reservations with regard to the incorporation of policies within the document, Pigeon support the general thrust of this Policy and welcome the flexibility provided, including the clear distinction that is drawn in terms of the approach towards outline and detailed planning applications. However, given that National Policy has moved on since the adoption of the Local Plan, the draft SPD should be clearer as to how the requirements of Policy EN4 should be interpreted in the context of the optional technical standards and the Code for Sustainable Homes (CSH). Firstly, the Policy should state that they cannot require the lower water consumption standard mentioned in part d. We recognise that the Council are suggesting that the developer could outline in their sustainability statement whether they are voluntarily applying the higher standard but it is important that the full picture regarding the optional technical standards is noted to ensure that decision makers do not seek to require this standard. The SPD must clearly state that this is an optional technical standard and can only be adopted through a review of the local plan. The Council should also refer to the Written Ministerial Statement from May 2015 which outlines that the only elements of the CSH that should be applied relate to energy performance standards. At present the SPD makes no reference to this distinction and as such could lead to unnecessary confusion and poor decision making. Finally, we note that the final part of the draft 'Policy' seeks to encourage the incorporation of Combined Heat and Power within larger scale residential schemes. Our understanding from the	General support noted and welcomed. Comments noted in relation to Code for Sustainable Homes. The guidance in section 4 does not require a Sustainability Statement, rather it states that one 'could usefully be prepared and submitted as part of the Design and Access Statement'. The guidance essentially sets out a good means of demonstrating how a proposal satisfies the requirements of Local Plan policy ENV 4, but in no way implies this is the only means of demonstrating compliance with ENV4. Items 'a' to 'g' are listed as items a Sustainability Statement <i>could</i> contain, not <i>must</i> . In respect of CHP comments, the consultation referred does not rule out CHP, but does acknowledge that it may not be the most effective solution in the future. CC1 wording reflects this sentiment – it explicitly says other	Section 4 paragraphs and Policy amended to provide clarity on Code for Sustainable Homes. CHP section also adjusted to make it clear that CHP is only an option to explore ('could' rather than 'should'), acknowledging it may not always be the best solution.

		consultation on the Future Homes Standards and related background evidence is that CHP is no longer considered to be a sustainable option for heating homes and the emphasis is now being placed on the use of Ground and Air Source Heat Pumps in order to meet the forthcoming changes to Part L of the Building Regulations and the Future Homes Standard. It is considered that this requirement should therefore be changed or deleted to reflect this.	options may provide a better solution. As a slight adjustment to CC1, the text has changed to could rather than should explore CHP.	
CLC-59	Pigeon Investment Management Limited CC3 Object	We consider this to be a new policy in its own right as it sets out requirements for new development that will be used to determine planning applications. It is noted that elements of the text of CC3 have been directly lifted from the withdrawn local plan. For example, the first paragraph under adaptable design has been taken directly from Part C of policy LP22 in the withdrawn local plan. The Council has tried to link this supposed guidance to policy ENV4 in the local plan but given that this policy is entitled energy and water efficiency there would seem to be little relating it to the elements in CC3 on adaptable design and heat resilience. It appears that the Council is trying to incorporate a policy from the withdrawn local plan into the SPD. Since this policy goes beyond the requirements of the Adopted Local Plan it should be deleted.	See response at CLC-47 .	See CLC-47 .
CLC-60	Pigeon Investment Management Limited CC4 Object	We support the intention of the policy to ensure that new developments do not compromise any existing or approved renewable energy or low carbon energy generation facility in the District. However, it is considered that this should be expanded to include associated infrastructure. Pigeon is bringing forward a number of Battery Energy Storage Schemes across the Region including within East Cambridgeshire in order to support the expansion of renewable and low carbon technologies and manage intermittencies in energy demand and supply on the electricity network. Given the important role of renewable technologies and associated energy infrastructure in achieving net zero carbon emissions by 2050 in response to the Climate Emergency it is considered to be critical that new development does not compromise the operation of such facilities. A key consideration in this respect is noise emissions from such facilities on new residential properties subsequently approved. It is considered that this consideration should be added to the wording of the policy.	Agreed (noting that this policy is about protecting existing infrastructure, not whether or not new infrastructure should be approved)	Policy CC4 - add the words 'and/or associated infrastructure'

CLC-61	Pigeon Investment Management Limited Object	<p>Pigeon welcome this consultation and hope that the Council will find the comments of assistance. As noted above, whilst we support the general intentions behind the SPD we have a number of concerns with aspects of the document.</p> <p>In particular, it is important that a clear distinction between policy and guidance is maintained within the document. SPDs that blur the boundaries between policy and guidance are not helpful to either applicants or decision makers. At present this SPD not only blurs the boundary between what is and is not policy it also places new requirements on development. This is wholly inappropriate. If the Council wishes to adopt new policy measures it should do so through a review of its local plan and not through SPDs.</p> <p>I trust that you will find our comments, which have been provided in the interests of facilitating the delivery of sustainable development, of assistance in moving forward towards adoption of this important SPD. Pigeon are more than happy to give any assistance in clarifying or expanding on any comments made in the above text and attached documents and would be happy to attend a workshop with various stakeholders to discuss aspects of the document and practical examples if this would be of assistance in discussing and finalising matters.</p>	Comments noted (matters raised dealt with in other responses to this consultee)	No change to the SPD
CLC-62	Historic England Observation	<p>Thank you for consulting us on your Draft Climate Change Supplementary Planning Document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. Therefore, we welcome the opportunity to comment on the draft document. These comments have been formed in line with the NPPF (2019), which sets out the need for heritage assets to be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p>	Comments noted	No change to SPD
CLC-63	Historic England Support	<p>The purpose of an SPD is to provide guidance on the application of adopted policy, and it is important to ensure that the implication of this important policy document does not adversely affect or undermine the historic, physical and social value of the historic environment. Historic England recognises the clear benefits of producing an SPD for this topic area.</p>	Comments noted	No change to SPD

		We understand that the purpose of this SPD is to support the implementation of District Plan policies by providing technical guidance on Climate Change, sustainable design and construction to improve the environmental sustainability of new development. We note and welcome the reference to historic buildings and conservation areas in policy ENV4 on page 6. Likewise, we welcome the reference to heritage assets and key views in policy ENV6 Renewable energy development on page 6.		
CLC-64	Historic England Para 3.18 Support	We welcome the reference to heritage assets in paragraph 3.18 regarding commercial scale renewable developments on page 7.	Comments noted	No change to SPD
CLC-65	Historic England Para 3.22 Support	We welcome the inclusion of the extract for the Design Guide SPD, in particular the section on Renewables and the Historic Environment on page 8. We also welcome the reference to historic views in relation to small scale renewables on page 8. We note the reference to heritage assets in respect of large wind turbines on page 9.	Comments noted	No change to SPD
CLC-66	Historic England CC2 Support	We welcome the reference to heritage assets in the footnote of Policy CC2 on page 12.	Comments noted	No change to SPD
CLC-67	Historic England Object	Whilst we are pleased to see various references to the historic environment in this SPD, we consider that the SPD does not go far enough in addressing the risks posed to the historic environment. Climate Change can have a range of direct impacts on the historic environment, for example; accelerated weathering to historic fabric, erosion of archaeological sites through severe weather and harm to historic landscapes or changes in vegetation patterns. Equally Climate Change mitigation and adaptation responses can also have unwelcome impacts on the historic environment, such as damage to historic fabric through poorly designed energy-saving measures. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. Paragraph 007 of the Planning Practice Guidance for Renewable and low carbon energy, states that “great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting”. The SPD should therefore seek to limit and mitigate any	Comments noted. The Local Plan and national planning policy will be used to make decisions on planning applications: both local and national policy contain extensive policy on the protection, development and enhancement of the historic environment.	No change to SPD

		such damage to the historic environment. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.		
CLC-68	Historic England Object	<p>Historic Buildings and Energy Efficiency</p> <p>When considering energy efficiency measures the benefits of alternative options should be weighed carefully against the impact upon historic building, their character and their setting, this should be mentioned in the SPD. Significant energy savings can be achieved in historic buildings without implementing damaging alterations but the SPD does not make this clear. Small scale changes can result in improved performance, for example; altering how a building is used, improving maintenance, repairing or refurbishing existing historic windows and doors, installing secondary glazing, upgrading lighting, improving thermostat controls and boilers etc.</p> <p>A balanced well-informed approach is essential to upgrading historic buildings to reduce energy consumption. The SPD should set out the need for current environmental performance to be analysed in the first instance in order to support proposals. It is also critical that any proposals are based on a sound understanding of the pathology and construction of the existing building so that measures best suited to individual buildings and households (which take human behaviour into consideration as well as the building envelope and services) can be identified. Once analysis has been undertaken a graduated approach is recommended, beginning with management of the buildings and non-invasive measures before moving on to physical interventions.</p> <p>We would advise that the SPD makes reference to the need to understand historic fabric and make clear that standardised approaches or products may not always be suitable both in terms of the impact upon the significance of a historic building, and in perpetuating or worsening energy inefficiencies as a result of inappropriate retrofits. Energy efficiency measures can have the opposite effect if inappropriately applied to historic buildings, for example, thermal bridging can become an issue when insulating older buildings. When it occurs it is likely to increase levels of condensation and the overall thermal performance of the building is reduced. In a building where there is little insulation, the condensation is spread</p>	<p>Comments noted, and are not disagreed with, but would be an excessive and too specific a contribution to what is intended to be a short and specific SPD.</p> <p>Also, the Local Plan and national planning policy will be used to make decisions on planning applications: both local and national policy contain extensive policy on the protection, development and enhancement of the historic environment.</p> <p>Unfortunately, as a Supplementary Planning Document (i.e. not a DPD), the scope of this plan is limited to building upon the content of the existing Local Plan- it cannot introduce new policy standards or criteria.</p>	No change to SPD

		<p>over a large area, but the more insulation that is introduced, the more concentrated the areas of condensation will become at any thermal bridge.</p> <p>It is also important that heritage assets are not seen a constraining factor, but as a valuable aid to achieving sustainable development. For example historic buildings represent a significant investment of expended energy. Demolishing and replacing these historic structures would also require a major reinvestment of embodied energy and other resources. Therefore encouraging the reuse of existing historic buildings and spaces can help achieve sustainable development. The SPD could recognise that the beneficial re-use of existing buildings is a sustainable approach in its own right.</p>		
CLC-69	Historic England Observation	<p>In developing the SPD you may find the following Historic England guidance to be helpful in understanding the special considerations for historic buildings: https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historicbuildings/ https://historicengland.org.uk/whats-new/statements/statement-on-climate-changeand-sustainability/ https://historicengland.org.uk/whats-new/statements/modifying-historic-windows-aspart-of-retrofitting-energy-saving-measures/</p>	Comments noted	No change to SPD
CLC-70	Historic England Observation	<p>We look forward to engaging with you as this SPD is progressed over the coming months. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.</p>	Comments noted	No change to SPD
CLC-71	Persimmon Homes East Midlands Object	<p>This response relates to the consultation on the draft Climate Change (SPD) that will build upon the 'Environment and Climate Change' section of the Local Plan (April 2015). Our understanding of the document is that it intends to provide clarity and detail to inform developers on adaptations regarding climate change that will assist in gaining their support through planning stages.</p> <p>As you know, Persimmon Homes are one of the largest developers of new housing within the Cambridgeshire region, delivering hundreds of news homes every year. Even with the circumstances that every</p>	<p>Recognition of the importance of the issue is welcomed.</p> <p>Wider comments noted. See response to CLC-44</p>	See response to CLC-44

	<p>business finds themselves in; Persimmon have continued delivering high quality new housing, helping the region meet their housing needs. Persimmon therefore have a high interest in design guides such as this as it can affect our ability to meet this need and deliver housing. Persimmon Homes support the need for sustainable development. We will work with East Cambridgeshire District Council to ensure of this and we would expect this collaboration to be recognised within the document as an overarching theme.</p> <p>In the context of the above, Persimmon Homes recognises that the authority has identified a climate change emergency and both understands the importance of this, alongside the authority's objective to take action. As such, Persimmon Homes is keen to work with the authority on achieving its aspirations. However, the authority must also acknowledge that Persimmon Homes is also engaged with the Government on the wider climate change agenda and the need for energy efficient homes. As such it is in discussion with the Government on how to implement the Governments climate change targets and agenda for energy efficient homes, both for new and existing stock.</p> <p>An important consideration to this is how the Government's agenda is progressing through the changes to building regulations and the proposals for the introduction of the Future Homes Standard. Both of these significantly raise the agenda for energy efficiency and sustainable living and as a company we are driving to meet this agenda.</p> <p>However, it has to be understood that meeting this agenda requires a combined effort from all parties to be willing to work together to meet the wider aspirations of this important topic.</p> <p>As such, Persimmon Homes is fully committed to meeting the increased energy efficiency requirements arising from the Government's agenda, and indeed is working on innovative methods of construction and supply chains to meet this. However, it has to be acknowledged that without a coordinated and common approach adopted to solve this matter both the objective of it, and housing supply for districts will be affected. It is for this reason that it is important that policies that affect both housing supply and in particular the viability of developments are pursued through Local Plans that enable the proper scrutiny of the policies alongside other policy</p>		
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		<p>burdens on development sites. As such Persimmon Homes makes this representation to open a dialogue with the authority on what are the most effective and efficient ways to work towards better energy efficiency that align with the companies interests and engagement with Government targets, alongside addressing the local climate change declaration by the authority.</p> <p>This representation will consider parts relevant to the function of our business and we will consider each relevant element. Initially, this representation will review the Climate Change SPD in general.</p> <p>Our principle concern with this SPD that while the authority acknowledges within the draft SPD that there are lawful boundaries of SPDs, the authority are pushing too far on what an SPD can require from applicant. It is our concern that the council is openly pursuing to establish policies that were to be admitted into the Local Plan that was withdrawn by EDCD, and as such are considered to be unlawful. We note that this is also a point being made by the Home Builders Federation.</p> <p>The regulations are transparent in that SPDs cannot introduce statements that are designed to model policies that go to the heart of the determination of planning applications where they can affect viability. They are planned to present guidance and transparency to particular groups applying for planning permission in place of creating increased worry and turbulence. A new Local Plan could/should be prepared to accommodate policies rather than through SPDs. As it can only be done through lawfully appropriate mechanisms of preparing a Local Plan. This process will be able to investigate and inspect fully whether the policies proposed are sound.</p>		
CLC-72	Persimmon Homes East Midlands Object	<p>The National Planning Policy Framework (NPPF) states at paragraph 33 that policies in Local Plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and then should be updated as necessary. This SPD is trying to introduce standards to reduce carbon dioxide and design how residential houses are built internally, and is acting beyond the legal remit of a supplementary planning document.</p> <p>The policies within the SPD cannot be lawfully adopted as an SPD. The Council currently does not have climate change standards, but it is built upon the 'Environment and Climate Change' section of the Local Plan (2015). Thus this SPD is expanding on existing policy,</p>	See responses to CLC-44 and 45.	See CLC-44 and 45

		<p>however does not have the grounds to introduce new policies. Persimmon strongly object to these policies being introduced via a supplementary planning document. To do so is plainly unlawful. The policies coming out of this SPD clearly fall within scope of Regulation 5 (1)(a)(i), (ii) and (iv) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and thus can only be properly adopted as part of a development plan document (DPD). This has been tested in law and proved to be correct in one case William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd & Barwood Homes Ltd and Charnwood Borough Council. In this case Justice Gilbart quashed the SPD on the demonstration that it encompassed policies that should have been incorporated in the local plan, this is due to them being considered to be under regulation 5(1)(a)(i) and 5(1)(a)(iv).</p> <p>This position further confirms the setting of environmental standards cannot be introduced in an SPD.</p> <p>For the above reasons, the policies that the SPD are trying to introduce cannot be lawfully applied in planning decision making as it is Local Plan policy which has not gone through the appropriate process.</p> <p>Notwithstanding the above, please see below Persimmon Homes East Midlands comments on the content of the SPD.</p>		
CLC-73	Persimmon Homes East Midlands CC1 Object	<p>In essence the council must present transparency on the policy structure encompassing the alternative technical standards and the Code for Sustainable Homes (CSH). Essentially, East Cambridgeshire District Council (ECDC) must explain that they cannot demand the lower water consumption standard mentioned in part D. The SPD (Supplementary Planning Document) must openly articulate that this a discretionary technical standard and can only be adopted through the Local Plan. Along with that, ECDC must relate to the Written Ministerial Statement from May 2015 that summaries that only the elements of the CSH that will directly assign to energy performance standards. Presently, this draft SPD makes no allusion to this division, which potentially cause avoidable complexity.</p>	<p>ECDC feel that the wording of the guidance is clear that delivering lower water consumption is voluntary. The specific wording is ‘...the design intends to voluntary incorporate...’.</p>	No change to SPD
CLC-74	Persimmon Homes East Midlands CC3	<p>This form of guidance seems to present a likeness to policies that are subsequently written in the Local Plan. As components of the text of CC3 have been taken from the withdrawn Local Plan. For illustration, the first paragraph under adaptable design have been pulled from the</p>	<p>See response to CLC-47</p>	<p>See CLC-47</p>

	Object	Withdrawn Local Plan in part c of policy LP22. ECDC have tried to associate the guidance to Policy ENV4 in the local plan although that the policy is designated energy and water efficiency there would suggest insufficient detail in CC3 on adaptable design and heat resilience.		
CLC-75	Persimmon Homes East Midlands CC1 Object	<p>Without prejudice to the above, fundamentally the authority's SPD seeks to expand on Policy ENV4 of the adopted Local Plan, and it is this that is understood to be the parent policy of the SPD, to which it expands. However the full wording and interpretation of Policy ENV4 should be applied, alongside CC1 of the SPD which does make full reference to Policy ENV4.</p> <p>ENV 4 states very clearly states that all new proposals should aim for reduced or zero carbon development in accordance with the zero carbon hierarchy as far as practical. Policy EN4 then goes further to explain that applicants will be required to demonstrate how they have considered maximising all aspects of sustainable design and constriction as set out in the Code for Sustainable Homes (or its successor).</p> <p>The important factor here is that the policy refers to the Code for Sustainable Homes, which is no longer in play and thus the use of the Code for Sustainable Homes as a benchmark is inappropriate as the policy has been superseded by events. However, it is important to note that the text in parenthesis refers to 'or its successor'. On this basis the policy appears to have some shelf-life in it as it refers to the requirements of the successor to Code for Sustainable Homes, which for the purpose of Policy EN4 is the Government's Future Homes Standards. This the Government has committed to delivering with recent announcements coming in the week of the 16 November 2020. On this basis Policy ENV4 is therefore restricted in its remit to not go beyond the successor of the Code for Sustainable Homes, which in this case are the revisions to Part L of the Building Regulations and the Future Homes Standard as and when it is implemented.</p> <p>On this basis, Persimmon Homes is happy to entertain conversations and discussions in respect of meeting the requirements of ENV4 in application to the authority but only in the context of the true lawful remit of ENV4.</p>	<p>Comments noted.</p> <p>It is not correct, as implied by the representation, that the Code for Sustainable Homes has completely gone, because government's NPPG advice still explicitly refers to elements of it, in particular Level 4, which planning policies are permitted to align to.</p> <p>The Future Homes Standard is only at consultation stage, so is not something the council could link to in terms of policy or guidance position. Even if implemented, it is not deemed a direct replacement to the Code for Sustainable Homes (in the same way that passivhaus standard is not).</p>	Section 4 paragraphs and Policy amended to provide clarity on Code for Sustainable Homes..

CLC-76	Persimmon Homes East Midlands CC1 Object	To conclude, there should be an apparent difference amongst policy and guidance. This draft SPD seeks to go beyond not only the boundaries of what SPDs can do, but also CC1 fails to acknowledge that ENV4 is itself bound by the successor to the Code for Sustainable Homes, which is the amendments to the Building Regulations and the Future Homes Standard. If ECDC aspire to endorse new policy measures, then this should be done through a review of its local plan, and not as the hand of an SPD. As previously stated, it is crucial that policies determining planning applications should be contemplated in the examination process of the Local Plan.	Comments noted	No change to SPD
CLC-77	Natural England Observation	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England supports the Council's recognition of its role in protecting and improving the environment for future generations through preparation of a Climate Change SPD. This follows the Council's recent declaration of a climate emergency and adoption of an Environment Plan. We note that the SPD will build upon the 'Environment and Climate Change' section of the Local Plan (April 2015) and respond to national planning policy and guidance.	Comments noted	No change to SPD.
CLC-78	Natural England Object	Section 2 of the SPD acknowledges the significant contribution to greenhouse gas emissions through degradation and damage to the District's important rich peat soils as these continue to dry out and release CO2 into the atmosphere. Given the extent of the lowland peat resource across the district, and the major role this has to play in reducing and mitigating climate change, we believe this topic should be a central theme of the SPD. The document should highlight the significant contribution that protecting and enhancing the ecological network can achieve for climate change, in addition to delivering a wide range of other benefits for people and wildlife. Semi-natural habitats, and peatlands in particular, are a major carbon sequestering habitat. As indicated by IUCN peatlands are highly significant to global efforts to combat climate change, as well as wider sustainable development goals. The protection and restoration of peatlands is vital in the transition towards a low-carbon and circular economy.	Unfortunately, as a Supplementary Planning Document (i.e. not a DPD), the scope of this plan is limited to building upon the content of the existing Local Plan- it cannot introduce new policy standards or criteria.	No change to SPD
CLC-79	Natural England	We agree that growth should drive a responsibility to balance competing demands and mitigate negative impacts on the natural	See above.	No change to SPD.

	Object	environment, including for climate change, as far as reasonably possible. The SPD should recognise that protecting and increasing biodiversity and green space has an important role to play in climate change mitigation and adaptation. In our view a 'natural capital' approach is vital to the delivery of wider and more integrated benefits, for wildlife, people, climate change, the economy and society as whole. Our advice is that the SPD should make reference to the full requirements of Local Plan policy ENV 7 Biodiversity and geology and the importance of Cambridgeshire's lowland peat resource. The SPD should set out robust guidance and requirements to protect and enhance the district's ecological network, including the lowland peat resource, for the multi-functional benefits this will deliver including air quality and climate change. This should be set in the wider context of local biodiversity and GI targets, for example delivering biodiversity net gain, Double Nature across Cambridgeshire and contributing to the objectives of the Cambridgeshire Green Infrastructure Strategy.	Local Plan policy ENV 7 will be taken into consideration as necessary when determining applications. The Council's recently adopted Natural Environment SPD also covers much of these matters. The Council also looks forward to government finalising its Environment Bill, and associated natural capital and strategy aspirations.	
CLC-80	Natural England Observation	With regard to the distribution of peat soils across East Cambridgeshire NE's 'England Peat Status GHG and C Storage' mapping can be made available by contacting our WebMap2 Team: data.services@naturalengland.org.uk Further useful information is likely to emerge from the recently completed Cambridgeshire Fens Lowland Peat Pilot Study. The findings and recommendations of this and other pilot studies will inform preparation of Defra's England Peat Strategy. We will update you on relevant information when it becomes available.	Comments noted	No change to SPD
CLC-81	Natural England Observation Object	Natural England's advice is that plans and strategies to address climate change should prioritise measures to halt or slow down its progress as far as possible. We therefore support the measures set out in section 4 and 5 of the document to reduce carbon dioxide emissions and energy demand. We would support guidance to encourage development to aim for reduced or zero carbon, maximising sustainable design and construction, including BREEAM 'Very Good' standard or equivalent, as far as practicable. We suggest the last two paragraphs of CC1: Reducing carbon dioxide emissions should specify that 'green energy' schemes, including CHP plants, EfW schemes, solar farms etc. will not be supported if their construction or operation has the potential for adverse effect on	Unfortunately, as a Supplementary Planning Document (i.e. not a DPD), the scope of this plan is limited to building upon the content of the existing Local Plan- it cannot introduce new policy standards or criteria.	No change to SPD

		natural carbon stores, including reliance on energy crops grown on peat soils which can be damaging.		
CLC-82	Natural England Observation	We welcome that the SPD recognises that burning of fossil fuels and transport emissions are significant additional contributors to poor air quality and climate change. We agree that green energy schemes, such as the large-scale solar farms in the district, can offset some of these emissions; however, this is subject to schemes being appropriately located to avoid impact to the natural environment. Semi-natural habitats, particularly peatlands, provide a major role in carbon sequestration and improving air quality hence their protection and enhancement should be prioritised as far as possible.	Local and national policy will still be considered in the determination of planning applications.	No change to SPD.
CLC-83	Natural England CC3 Object	We welcome recognition of the need to adapt and build-in greater resilience to the impacts of extreme weather and climate change through managing flood risk, promoting sustainable drainage systems, protecting and enhancing the green infrastructure network, the natural environment and biodiversity and through building design aiming for zero carbon. We generally support the guidance set out in CC3: Resilient and adaptable design; however, the protection and enhancement of water resources and water quality, as natural capital assets, is critical for mitigating and adapting to climate change. This could be given greater emphasis here, or elsewhere, within the SPD.	Comments noted. Protection of water resources is addressed in the Local Plan.	No change to SPD
CLC-84	Natural England CC4 Support	Guidance within CC4: Safeguarding renewable and low carbon energy sources seems appropriate.	Comments noted	No change SPD
CLC-85	Natural England Observation	Natural England's further advice on climate change is set out in Annex A to this letter. This reflects our advice in response to Cambridgeshire County Council's consultation on a draft Climate Change and Environment Strategy. You may find it helpful to refer to this Strategy and also the Review being undertaken by the Mayoral Combined Authority's Cambridgeshire and Peterborough Climate Change Commission, to assess the ways that climate change is impacting local communities and the economy and actions required to adapt to or mitigate these effects.	Comments noted	No change to SPD
CLC-86	The Woodland Trust Para 3.22	We note the statement in the SPD that you have a separate SPD on natural environment, in which the contribution of trees and green infrastructure is addressed. We would be interested in being consulted when you come to revise that SPD.	The text on page 8 is an extract from the adopted Design Guide SPD.	No change to SPD

	Observation	In the draft Climate SPD, we have just one comment, which is related to the reference on page 8 to encouraging use of “sustainable timber”. We would like to see this be a bit more specific and refer to timber which is certified as coming from sustainable sources through a recognised accreditation scheme, such as that run by the Forest Stewardship Council.		
LATE COMMENT				
LATE1 (Rec 9 Dec 2020)	Environment Agency East Anglia Area (West) Support	We support the policies set out in the Climate Change SPD. The SPD sets out clear guidance on climate change mitigation and adaptation.	<i>LATE – but comment noted</i>	<i>No change</i>

Appendix A

Email

Draft Supplementary Planning Document (SPD): Climate Change

Dear Sir/Madam

We are emailing to consult you on the above supplementary planning document (SPD) and with this email, we have enclosed a consultation notice for the SPD. There will likely only be a single consultation on the emerging SPD. Following consultation, all comments received will be considered and appropriate amendments made. The SPD is then scheduled to be adopted by the Council early-mid 2021.

The draft SPD sets out East Cambridgeshire District Council's additional guidance in respect of **climate change**, providing advice on policy requirements relating to it. The Council recognises that it has a significant role to play in protecting and improving the environment for future generations. In producing this SPD, the Council is also responding to its declaration, in 2019, of a Climate Emergency.

This SPD will build upon the 'Environment and Climate Change' section of the Local Plan (April 2015) as well as responding to National Planning Policy and guidance.

Copies of the draft SPD and Consultation Notice are available for public inspection:

- on the Council's website at: <http://www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents>

The consultation period starts on **13 October 2020** and ends on **23 November 2020**. Only comments made during this period will likely be taken into account. Any comments made after the consultation period may be discarded.

You may submit your comments either by email to planningpolicy@eastcambs.gov.uk or send your comments via post to: Strategic Planning Team, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambs, CB7 4EE.

Please be aware all comments submitted on the SPD will likely be made available for public viewing. As part of the process, we will also be producing a Consultation Report which will include a summary of all the comments received and the Council's response to these comments.

If you have any questions or queries regarding the draft SPD consultation please contact the Strategic Planning Team on (01353) 665555 or email planningpolicy@eastcambs.gov.uk

Kind Regards,

Richard Kay

Strategic Planning Manager

Appendix B

List of all Consultees

All Parish Councils in East Cambridgeshire District Council.	Ely Diocesan Board of Finance
Anglia Design LLP	Ely Tool Hire Ltd
Anglian Water Services Limited	Endurance Estates Strategic Land Ltd
Beacon Planning Ltd	Environment Agency
BGG Associates Ltd	Exning Parish Council
Bird & Tyler Associates	F.J. Pistol Holdings Ltd
Bloor Homes	Feltwell Parish Council
Bovis Homes	Fen Ditton Parish Council
Brand Associates	Fen Line Users Association
BT Openreach	Fenland District council
Camal Architects	Flagship Group
Cambridge Past, Present & Future	Flavia Estates
Cambridgeshire	Fletcher Barton
Cambridgeshire & Peterborough Combined Authority	Forest Heath District and St Edmundsbury Borough Councils
Cambridgeshire ACRE	Forest Heath District Council
Cambridgeshire and Peterborough Clinical Commissioning Group	Foundation East
Cambridgeshire City Council	FP McCann Ltd
Cambridgeshire Constabulary	Freckenham Parish Council
Cambridgeshire County Council	Freebridge Community Housing
Cambridgeshire Fire and Rescue Services	Galliford Try Plc
Cambridgeshire PCT	Gazeley Parish Council
Cambridhe Housing Group	Gladman Development Limited
CAMRA	Graham Handley Architects
CAMRA - Campaign for Real Ale	Granta Architects
Carter Jonas LLP	Greater Cambridgeshire Local Nature Partnership
Catesby Property	Green & Sons Land & Cattle
Chatteris Town Council	Hanson UK
Chorus Homes	Hastoe Housing Association
City of Ely Council	HE Group Ltd
CJ Murfitt Limited	Herringswell Parish Council
Claire's Chef Agency	Highways Agency
CLT East	Highways England
Co-Housing Network	Hilgay Parish Council
Colne Parish Council	Historic England
Cottenham Parish Council	Hockwold Parish Council

<p>CPRE Cambridgeshire & Peterborough</p> <p>Create Buildings LLP</p> <p>Dalham Parish Council</p> <p>DC Blayney Associates Ltd</p> <p>DPDS Consulting</p> <p>Dudley Developments</p> <p>Eagle Home Interiors Ltd</p> <p>Earith Parish Council</p> <p>EDWARD GITTINS & ASSOCIATES LTD</p> <p>Huntingdonshire District Council</p> <p>Hutchinsons</p> <p>Iceni Homes</p> <p>Inland Waterways Association</p> <p>EE</p> <p>Isleham Cricket Club</p> <p>James Mann Architectural Services</p> <p>JDR Cable Systems Ltd</p> <p>Jockey Club Racecourses Limited</p> <p>Kennett Action Group</p> <p>Kennett Community Land Trust</p> <p>Kentford Parish Council</p> <p>Kings Lynn and West Norfolk District Council</p> <p>Laragh Homes</p> <p>Lidgate Parish Council</p> <p>Lines Chartered Sureyors</p> <p>Lovell</p> <p>Lyster Grillet & Harding</p> <p>Manea Parish Council</p> <p>Marine Management Organisation</p> <p>Mepal Parish Council</p> <p>Ministry of Defence</p> <p>Mobile Operators Association</p> <p>Moulton Parish Council</p> <p>National Grid</p> <p>National grid</p> <p>National Trust</p> <p>Natural England</p> <p>Network Rail</p> <p>Newmarket Town Council</p>	<p>Home Builders Federation</p> <p>Home Group</p> <p>Homes and Communités Agency</p> <p>Homes England</p> <p>Hopkins Homes Ltd</p> <p>Horningsea Parish Council</p> <p>Howes Percival LLP</p> <p>HPB Management Ltd</p> <p>RG&P Ltd</p> <p>RLN (UK) Ltd</p> <p>Sanctuary Group</p> <p>Savills-Smith Gore</p> <p>Scotsdale Hill</p> <p>Scott Properties</p> <p>SE Cambs Liberal Democrats</p> <p>Sentry Ltd</p> <p>Shaping Communities Ltd</p> <p>ShrimplinBrown Planning and Development</p> <p>Simon J Wilson Architects</p> <p>Soham CLT</p> <p>Soham Town Council</p> <p>South Cambridgeshire District Council</p> <p>Southery Parish Council</p> <p>Sport England</p> <p>Stow-cum-Quy Parish Council</p> <p>Straus Environmental</p> <p>Stretham and Wilburton CLT</p> <p>Strutt and Parker</p> <p>Sttrutt and Parker LLP</p> <p>Suffolk County Council</p> <p>Sustrans East of England</p> <p>Sutton Parish Council</p> <p>Swaffam Prior CLT</p> <p>Swaffham Prior Community Land Trust</p> <p>Tetlow King</p> <p>The Coal Authority</p> <p>The Ely Group of Drainage Boards</p>
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NHS England	The Lady Frances Hospital Almshouse Charity
NKW Design	The Wildlife Trust
Norfolk County Council	The Woodland Trust
Ousden Parish Council	Theatres Trust
Palace Green Homes	Three
Pegasus Planning Group	Timothy Smith and Jonathan Taylor LLP
Peter Humphrey Associates	UK Power Networks
Phase 2 Planning and Development	Unex Corporation Ltd
Phillips Planning Services Ltd	Universal Garage
Pigeon Investment Management	Verity & Beverley
Places4People	Virgin Media
Plain View	Ward Gethin Archer
Plainview Planning Ltd	Waterbeach Parish Council
Planinfo	Welney Parish Council
Planning Potential Ltd	West Suffolk Councils
Pocock and Shaw	Westbury Garden Rooms
Ragilbury Roots Ltd	Wildlife Trust BCN
Ramblers Association (North)	Willingham Parish Council
Rapleys	Michael Rose
Red Lodge Parish Council	Andrew Holland
Witchford CLT	Aidan and Karen Walmsley
Woods Hardwick Ltd	Adrian Fleet
WYG	Alan Kirk
Advance Land & Planning Ltd	Alastair Watson
Advance Planning	Pamela Joyce
Amec Foster Wheeler E&I UK	Alexa Pearson
Andrew Fleet MCIAT	Christine Ambrose Smith
Armstrong Rigg Planning	David Ambrose Smith
Ashley Parish Council	Amy Wright
Barton Willmore	Andrew Taylor
Beacon Planning Ltd	Antony Cornell
BGG Associates Ltd	Michael Anthony
Bidwells	Bridget
Brown & Co	Lesley Audus
Cambridgeshire County Council	Robert Thomson
Carter Jonas LLP	Ian Wright
Cheffins	Stephen Butler
Churchgate Property	

City of Ely Council	Alison	Bye
CODE Development Planners	Cary	Simpson
Construct Reason LTD	Conor	O'Brien
Deloitte Real Estate	Phyllis	Rusk
Denley Draughting Limited	Cheryl	Jowett
Eclipse Planning Services	Cheryl	Cox
Education and Skills Funding Agency	Clare	French
Edward Gittins & Associates	Su	Field
EJW Planning Ltd	Catherine	Judkins
Framptons Town Planning Ltd	Francesca	Wray
Freemantle Developments Limited	Chris	Hurrell
Gladman Development Limited	Catherine	George
Haddenham Parish Council	Dale	Ingham
Historic England	David	Porter
Hollins Strategic Land	David	
Hopkins Homes Ltd	Charles	Werner
Howes Percival LLP	David	Watson
Hutchinsons	Dawn	Buck
Indigo Planning	David	Chaplin
Infinity Architects	Diana	Ward
JMS Planning & Development Ltd	Diana	Donald
Juniper Real Estate	Gary	Lindsay
K Garnham Design	Geoffrey	Reed
King West	George	Rusk
Lacy, Scott & Knight	Gareth	Maslen
Manor Investments Ltd	Graham	Thompson
Martindales Architects Ltd	Greg	Saberton
Mattanna Ltd	Geoffrey	Woollard
MWS Architectural	Hilary	Threadgold
Navigate Planning Ltd	Hugo	Upton
NJL Consulting	Ian and Birgit	Boylett
Oxalis Planning Ltd	Ian	Gilbert
Pegasus Group	Jacqueline	Jones
Pegasus Planning Group	P.J	Smith
Percival and Company	B & V	Roberts
Peter Brett Associate LLP	Aaron	Jacobs
Pigeon Investment Management Ltd	James	D'Souza
PlanSurv Ltd	Lesley Jan	Eaton
Pocock & Shaw	Jenny	Sherlock

PRP	John	Rees
Rapleys LLP	Jo	Braybrooke
Redrow Homes Ltd	John	Bridges
Richborough Estates Ltd	John	Powell
RPS Consulting	John	Armour
RPS Planning & Development	John	San Vicente
Savills	Jonathan	Cook
Savills (UK) Ltd	John W	Smith
Simon Pott and Co	Katharine	Cantell
Strutt and Parker	Karl	Dunn
Strutt and Parker LLP	Kevin	Arrowsmith
Swann Edwards Architecture	Laura	Ross
Sworders	Lauren	Whitworth
Tetlow King Planning	Lisa	Stubbs
The Design Partnership (Ely) Ltd	Elizabeth	Hunter
The Environmental Partnership	Elizabeth	Houghton
Third Party Delivery Ltd	Lorna	Dupre
Town Planning Intelligence	Mark	Inskip
Troy Planning & Design	Malcolm	Palmer
Turley Associates Ltd	Mark	Goldsack
Unex Corporation Ltd	Michael	Murfitt
William H Brown	Edwina	Newbury
Williams Griffiths Architects	Niki	Allsop
Wood PLC	Nigel	Cooper
Woolley Project Management Limited	Mark	Robertson
WYG	Phil	Newell
WYG Planning & Environment	David	Alberry-King
Amy Richardson	Christopher	Threadgold
Andrew Boughton	Peter &	
Ben Pridgeon	Laura	Wood
Marilyn Strand	Malcolm	Malcolm Roper
David Barker	Bob	Joy
Ellie Zdyrko	Rhodri	Pashley
Margaret Franklin	Rachel and	
Ian Smith	John	Rees
Jamie Palmer	Roger &	
Jackie Ford	Jennifer	Johnson
Kate Wood	Robert	Boyle
Meghan Bonner	Robert	Algar

Andrew Fleet		Robin	Threadgold
Mark Baker		Roderick	Smith
Mark McGovern		Rod	Hart
Nina Crabb		Rodger	Germany
Peter Frampton		Roy	Pallett
Rebecca Sharpe		Angus	Runciman
Sarah Hornbrook		Ruth	Paskins Gordon
SJK Planning		Ryan	Jones
Suzanne Nugent		Sue	Burnell
Tony Welland		Frank and	
Richard Agnew		Shirley	Broadfield
Terry	Frost	Stuart	Cooper
Alison	Glover / Spencer	shelagh	Monteith
Lisa	O'Mahony	Simon	Raffe
Tim	Bonavia	Selina	Boyce
Philip	Scott	Stephen	Burgess
Tom	Edwardes	Steve	Plumb
Anthony	Jolley	Susan	Frankland
Anthony	Weston		
stygol	Stygol		
Trevor	Edwards		
Anthony	French		
Viva Arts and Community Group			
Daniel	Pullan		
Peter	Landshoff		
Maureen	Munks		
Becky	Lockyer		