

TITLE: Local Plan Climate and Natural Environment Chapter - Scope

Committee: Finance and Assets Committee

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1.0 ISSUE

- 1.1. To agree the skeleton of a new ‘climate change and natural recovery’ chapter for, ultimately, inclusion in the East Cambridgeshire Local Plan, with a complete draft chapter to be prepared thereafter for consideration by Committee in January 2024. Further, to consider whether to progress specific early planning guidance on hedgehog recovery.

2.0 RECOMMENDATIONS

- 2.1. Members are requested to:

- (i) Agree the skeleton outline for a new *Climate Change and Nature Recovery* chapter for the Local Plan as set out at Appendix A, with the intention to agree at the Committee’s next meeting on 25 January 2024 a full draft chapter for subsequent public consultation; and
- (ii) Ask officers to bring to the next meeting of this Committee a draft Hedgehog Recovery Supplementary Planning Document.

3.0 BACKGROUND/OPTIONS

- 3.1. The Council’s latest Environment Plan (June 2023) included a commitment as follows:

*“Action 17: In acknowledgement that climate change is happening, and will continue to accelerate, the Council will establish a climate adaptation and climate risk plan, identifying the greatest risks to the Council and its services, and how it can start to help our communities adapt to a changing climate and biodiversity loss. **To complement this, we will also commence preliminary work and consultation on a new ‘climate’ chapter for the Local Plan, which will look at how new buildings can be both more energy efficient and have the ability to adapt to a changing (warming) climate.**”*

- 3.2. This agenda item relates to the highlighted second half of the above commitment, with the first half being progressed separately. The Council’s Corporate Plan *Corporate Actions July 2023 to July 2024*, as agreed at Full Council in July 2023, similar committed to preparing such a chapter.

- 3.3. The purpose of this agenda item is to present to this Committee the potential skeleton outline for such a chapter, so that, thereafter, officers can progress the content of such a chapter in detail. That detail will be brought back to this Committee for consideration at your next meeting in January 2024 and, if approved, then undergo a period of public consultation.
- 3.4. In addition, this agenda item brings to the attention of Members the outcome of the 'people's vote' as to which animal residents of East Cambridgeshire wanted the Council to most support their conservation of. Whilst all candidate animals received a healthy share of the vote, it was hedgehogs that ultimately received the highest share of the vote. Eleven year old Adara, of Littleport, was the lucky winner to name our mascot hedgehog, choosing the name 'Prickles'. This public vote triggers a long-term programme of direct assistance and awareness raising to support hedgehogs, and it is recommended that one such early action could be the preparation of a supplementary planning document (SPD) to help direct developers to build appropriate hedgehog-friendly gardens and open spaces. Such a document can be introduced quickly, and then, in time, its policy intentions reinforced in an updated Local Plan.
- 3.5. Further details on a potential Hedgehog Recovery SPD are set out later in this report, but first we turn to the potential of a Climate Change and Nature Recovery chapter for inclusion in a future Local Plan update.

Scope of a Local Plan – in general terms

- 3.6. Before discussing the scope of potential chapter on Climate Change and Nature Recovery, it is first worth reminding ourselves what scope a Local Plan has, in more general terms, to set policy.
- 3.7. On the one hand, the scope is incredibly wide. There is no fixed detailed rule book as to what a Local Plan must contain or, for that matter, must not contain. But on the other hand, the content of a Local Plan must be 'sound', and achieving such 'soundness' is incredibly challenging, time consuming and expensive.
- 3.8. Fundamentally, a Local Plan is a land use plan. So, the policies it contains must be about land, and what land should or should not be used for. Whilst a Local Plan is often used for wider ranging reasons (such as setting a vision for an area, and for influencing infrastructure and investment spend), ultimately its primary use is to help determine planning applications received by the Council.
- 3.9. As such, the policies it contains must be written in a way that a decision maker on planning applications can form a decision. In simple terms, policies should be written in the form of *'Development proposals should do A, B and C, and development proposals must not do X, Y or Z'*.
- 3.10. In that sense, therefore, a Local Plan is not the place for including policies on wider corporate aspirations or policies. It is not, for example, the place to set district wide net zero carbon emission targets. However, such wider corporate aspirations can influence or steer what the Local Plan policies say, so that, via new development, those corporate aspirations are more likely to be met.
- 3.11. It is also worth remembering that a Local Plan is independently examined by an Inspector before it can be adopted by a Council. The Inspector is given by

Government the following headline rules to follow, to work out whether a Local Plan is 'sound'. These are known as the 'tests of soundness':

- a) *Positively prepared;*
- b) *Justified;*
- c) *Effective; and*
- d) *Consistent with national policy.*

- 3.12. Finally, as previously reported to Full Council, the national planning system is subject to a lengthy and comprehensive overhaul by Government, starting with the Planning White Paper (August 2020), leading to the very recently agreed Levelling Up and Regeneration Act (October 2023), and thereafter requiring secondary legislation to confirm the detail. The content of this paper is therefore primarily based on the 'current' system of plan making, as there is still very little detail as to how the new plan-making system will work in practice. As preparation of this Climate Change and Nature Recovery chapter evolves, it will likely have to adapt to changing national law and policy.

Scope of a Local Plan – for a Climate Change and Nature Recovery related chapter

- 3.13. Whilst Action 17 in our Environment Plan refers to preparing a 'climate' chapter, it is proposed for the purpose of this agenda item and the emerging chapter that additional emphasis on the natural environment is also included in the new chapter.
- 3.14. Attached at Appendix A is draft skeleton outline of a possible consultation document. In short, Committee is asked to approve that outline, so that over the coming month or so, the details can be fleshed out and brought back to this Committee for approval. By bringing this skeleton outline to Committee now gives Committee the greatest opportunity to steer the broad content of the chapter, rather than just receiving a full draft chapter for approval in one go.
- 3.15. To help explain the content of Appendix A, set out below is further explanation of what is intended in the chapter, and why.
- 3.16. A key element proposed throughout the chapter is to, wherever possible, establish policies which **require** developers to do certain things, rather than just **encourage**. Unfortunately, policies which only encourage certain measures tend to be ignored and are certainly not strong enough as a tool to refuse planning permission.

Design and Layout (Policy Climate&Nature1)

- 3.17. Of course, 'good design' has always been a key function of the planning system, but has typically been considered from an aesthetics point of view or, to put it simply, will the development 'look good' once built. Local Plans will always contain policies addressing these matters.
- 3.18. However, the question for Committee is whether such design and layout policies should also consider climate change and the natural environment from a master-planning, urban landscaping, plot layout and building orientation perspective.
- 3.19. Put another way, should the new chapter for the Local Plan introduce, via policy, additional requirements beyond aesthetics to also consider how well a development will **function** from an environmental perspective. For example, we could require

developments to orientate south for solar gain, but also be designed to stop over-heating in summer. We could also require buildings which are more adaptable to a future changing climate, as well as future changing occupancy. There are lots of other design aspects that we could require developers to demonstrate, as part of their proposals, in terms of the form and function of new buildings and spaces, to help mitigate against, and adapt to, climate change.

- 3.20. On the flip side, if we do require such measures, we need officers to be suitably trained and skilled to understand and appraise such designs (and challenge them where necessary). Simply noting that a building is orientated south does not mean solar gain will be achieved in the right rooms, at the right time of day or in the right seasons. In fact, it could cause considerable over-heating if poorly designed.

Energy Efficiency (Policies Climate&Nature2 and Climate&Nature3)

- 3.21. On the theme of energy efficiency, it is necessary to first consider the legal position in terms of the scope of what a Local Plan can include on this matter. As is often the case in planning matters, this is far from straight forward.
- 3.22. It should be remembered that basic national minimum mandatory build standards, on the matter of energy efficiency, are set out in the Building Regulations. Periodic updates of these Regulations tend to strengthen the requirements, and there are proposals to enhance them further by Government, under what is known as 'Future Homes Standards' and (slightly behind in terms of preparation) a similar standard for other buildings. However, even such standards once introduced are only regarded as creating buildings which are 'net zero ready', by which they are considered capable of being converted in the future to become net zero carbon emitting buildings. They also only cover regulated energy (e.g. heating) not unregulated energy (e.g. plug in appliances). What this means is that such homes, built to modern Building Regulation requirements, will highly likely still require some form of retrofit in order to be truly net zero in the future, potentially extensive and expensive retrofit. That said, a new home built today, under modern Building Regulations, is far superior in terms of energy efficiency than a home built in the past.
- 3.23. In this context, we come to an important question: should the new climate change and natural recovery chapter go beyond Building Regulations, and set far more stringent energy efficiency requirements for new build developments? Legally, this is possible, via the Planning and Energy Act 2008, and a small number of front-runner adopted Local Plans have already done this (Central Lincolnshire Local Plan, 2023, for example).
- 3.24. So, why wouldn't a Council include (or at least attempt to include) such policies? The most likely reason is the cost burden on developers. Evidence indicates that requiring super-energy efficient homes, beyond Building Regulations, could cost £5,000-£10,000 more to construct, and many developers say that is a burden they can't afford and don't want to pay. What developers typically neglect to mention, however, is that such homes have perhaps 80% energy cost reduction for the occupiers, for life, and that mortgage products for super-efficient homes often come at a discount. Such homes are therefore a much-improved product, cheap to run, slightly cheaper to mortgage, require no future retrofitting measures and (something developers rarely mention) can potentially deliver a premium sales price compared with their standard Building Regulations compliant product. The 'we can't afford the

burden' argument, therefore, has perhaps limited traction on a whole cost lifecycle basis, though experience shows that it will inevitably be a repeated argument used by housebuilders against the formulation of such policies.

- 3.25. A further constraint to a Council having such policies is the ability for the Council's planning service to implement and enforce them. It will require upskilling of planning officers to understand technical aspects of energy efficiency and whether a proposal is meeting required policy. Again, this is possible, but we need to be mindful of it.
- 3.26. In the attached, it is recommended that we do consult on policies which intend to require new development to be more energy efficient than standard buildings Regulations, both for residential (Climate&Nature2) and non-residential (Climate&Nature3).

Renewable energy (on site) (Policy Climate&Nature4)

- 3.27. Whilst reducing energy use in the first place (i.e. energy efficiency, via Climate&Nature2 and 3 above) should always be the priority, the next obvious step is to then produce what remaining energy is required in a very low (or zero) carbon way, and produce that energy on-site.
- 3.28. In practical terms, this is most likely, because it is cheap and widely available, to be in the form of individual rooftop PV solar panels, ideally with complementary battery storage.
- 3.29. However, it could be in the form of, for example, a community renewable energy scheme.
- 3.30. Provided homes are built with a very high degree of energy efficiency, it is relatively easy to generate renewable energy on site to help meet remaining energy demand.
- 3.31. Again, developers will no doubt argue any such policy is beyond basic Building Regulations (which is true) and will be a cost burden to them. However, it will be considerably cheaper to install such infrastructure at original build stage than it will be to retrofit such measures by the occupiers in years to come. Also, designing such features from the start will always look more aesthetically pleasing than a retrofit 'patch' added to home or other building in future years.
- 3.32. Cost wise, for a typical home implementing both energy efficiency (Climate&Nature2) and some renewables (Climate&Nature4) will likely be around £7-15k above basic building regulations. This will need testing and demonstrating as the policy progresses, and it is expected to be at the lower-to-mid half of that range.
- 3.33. Thus, Committee is recommended that we do include a policy requiring at least some degree of renewable energy to be provided on site.

Biodiversity Net Gain (Climate&Nature5)

- 3.34. A Local Plan has always contained policies in respect of the natural environment, and especially so in terms of protecting designated sites, protected species or policies in respect of trees and woodlands. Such policies are therefore taken as a 'given' for inclusion in a future update of the East Cambridgeshire Local Plan.

- 3.35. However, one area for Committee to explore is the issue of Biodiversity Net Gain (BNG). This is somewhat a binary choice for Members, in terms of inclusion in the new chapter or not.
- 3.36. The first option is to simply implement BNG as nationally mandated on all relevant development proposals from January 2024 (Major applications) and April 2024 (minor applications). In short, this requires a 10% gain in biodiversity compared with the pre-development situation, albeit the process to demonstrate, approve and enforce it is technical and set out via complex rules and procedures.
- 3.37. Being a legislative requirement, there is virtually no legal scope to ‘tinker’ with any of this new BNG national process, and it would be advisable for any Council not to attempt to do so via its Local Plan. And, as the process is mandatory, there is no need to have a policy on it in a Local Plan.
- 3.38. However, there is one realistic exception to that rule, and it is a very simple one. Namely, should this Council require a higher BNG requirement, rather than the mandatory minimum 10%? For example, should we require developers to achieve a 20% net gain? A number of councils are considering this option, and there appears no legal reason why this should not be possible.
- 3.39. Why wouldn’t we? Again, developers will argue cost. But research elsewhere in the country is identifying that whilst there is, on an average development scheme, a significant cost to achieve the mandatory 10% gain, there is very limited *additional* cost to achieve, say, a 20% net gain, perhaps as little as £50 per dwelling, and no more than around £1,000 per dwelling. The additional cost to achieve 20% rather than 10% is, therefore, a tiny fraction of total build costs.
- 3.40. In East Cambridgeshire, we would have a good case to argue the principle of going beyond 10%, on the simple (unfortunate) fact that East Cambridgeshire, and Cambridgeshire as a whole, is one of the most ‘deprived’ in terms of land set aside for nature in the country. Consequently, there is a strong case that developers in our area should assist rectifying that situation.
- 3.41. No known Local Plan has successfully adopted a greater than 10% BNG requirement yet, but it is likely several test cases will come forward soon.
- 3.42. Committee is recommended to approve, in principle, that we seek a BNG requirement above 10%, subject of course to public consultation and wider testing.
- 3.43. It is worth noting that introducing a high BNG requirement will place very little additional burden on the Council’s planning officers. Our planning officers will have to do all the appraisals and calculations to work out the % gain in any event under the mandatory system. It is largely irrelevant whether the target figure is 10% or 20% from a time resource or skills perspective.

Hedgehog Recovery (Climate&Nature6)

- 3.44. Whilst ordinarily a Local Plan is unlikely to have a bespoke single policy on the theme of a single species, there is no legal or national policy to prevent such a policy being included. In our case, having listened to what the public want us to do (namely, support hedgehog recovery), there is a strong case to introduce such a single species policy and require developers to design their proposals in a hedgehog-friendly way. To do so is simple, effective and virtually cost-free to a developer.

- 3.45. Committee is recommended to pursue such a policy in the new Local Plan Chapter (and, in the shorter term, approve production of a Hedgehog Recovery SPD – see later for further details).

Supporting adaptation of existing buildings to meet the climate and nature challenge (Climate&Nature7)

- 3.46. Earlier, it was stated that it is recommended that a Climate Change and Nature Recovery chapter should be written in a way which *requires* developers to do certain things, rather than just *encourage*.
- 3.47. However, sometimes it is appropriate to introduce encouraging or facilitating policies for those scenarios whereby, as Local Planning Authority, we could not compel something to happen. In the context of this new Chapter, the most obvious example is in relation to existing buildings. The planning system cannot compel an existing property owner to do anything to their property; but we can encourage and support that property owner to do certain things to improve their property.
- 3.48. Thus, it is recommended that we prepare, for consultation, a broad policy which supports and encourages property owner who wish to improve their existing property for the benefit of climate change (mitigation or adaptation) or for nature. For example, it would encourage proposals which make the existing building more energy efficient, install Electric Vehicle charge points, install appropriate renewable energy or be adaptable to a changing climate (such as measures to aid natural cooling). The policy can also encourage more community wide infrastructure investment, such as low-carbon district heating or a community scale renewable energy scheme.

Other Policy Options considered

- 3.49. A few other elements of climate change have been considered for their potential to be included in a Climate Change and Nature Recovery Chapter.
- 3.50. Theoretically, the chapter could attempt to minimise **embodied carbon** arising from the construction industry. Embodied carbon is the greenhouse gas emissions arising from sourcing raw materials, manufacturing items from those raw materials, and transporting such manufactured items to point of use or sale. Thus, to illustrate the point, a typical average new brick built home probably emits around 50 tonnes of CO₂ during its construction phase from all the bricks and other materials used i.e. these emission arise before anyone occupies the home. To help understand what 50 tonnes of CO₂ means, then as a rough guide it is equivalent to driving 250,000 miles in an average petrol car. Or, if you prefer to look at it in reverse, then 50 individual trees would have to planted, thrive and grow for 50 years before all the carbon was recaptured from the emissions arising from building that one single home.
- 3.51. However, whilst information is slowly improving, it is still extremely hard to quantify the embodied carbon of a development scheme, due to the huge number of variables involved and the lack of any labelling system (i.e. if you buy a brick, it doesn't come with a CO₂ label on it). For now, therefore, there are reservations introducing such a policy requirement in a Local Plan which would seek to require developers to reduce embodied carbon.
- 3.52. Separately, the Chapter could look at **commercial scale renewable energy** (i.e. renewable energy not associated directly with a wider development scheme). A

Local Plan could not require such development to take place, but it could theoretically look at facilitating it. Establishing such a policy would be time consuming and costly, primarily because identifying any such suitable sites in the Local Plan would have to take account of a large number of constraints, and especially the plethora of European protected (mostly bird related) habitats and their 'buffer zones' which extend across much of the district. Such a policy is not, therefore, currently proposed.

- 3.53. **Electric Vehicle (EV) charging** infrastructure has also been considered, but recent Building Regulations requirements now mandate minimum EV infrastructure as part of new developments. There appears little additional requirement a Local Plan policy could add. Any such policy could end up confusing, rather than assisting, roll out of EV points as part of new development.
- 3.54. The issue of **waste and recycling** has also been considered, but the Cambridgeshire Minerals and Waste Plan is the most appropriate place for such policy, and its recent updated version (July 2021) is considered comprehensive and up to date on climate and nature related matters.

Draft emerging chapter at Appendix A

- 3.55. Bringing all of the above together, at Appendix A is a recommended skeleton of a chapter for Committee consideration. If approved, it will be fleshed out so as to create a document that is, subject to Committee approval in January 2024, capable of being consulted upon with the public.

Hedgehog Recovery Supplementary Planning Document

- 3.56. Moving away from the Local Plan Climate and Nature Recovery Chapter, this report now turns to a potential Hedgehog Recovery Supplementary Planning Document (SPD).
- 3.57. In the Council's Environment Plan, June 2023, action 7 is as follows:
- Via the 'Green Fair' in August 2023, put to the public vote the launch of a single species recovery programme for East Cambridgeshire, with the long term aim of East Cambridgeshire being recognised as the national hub helping the recovery of that species - East Cambridgeshire: Home of [You Choose the Species!] Recovery. By June 2024, we will have invested at least £5,000 to kick start on-the-ground improvements for the species you vote for.*
- 3.58. In addition to the Green Fair event, we also held additional voting opportunities (alongside general opportunities to engage with residents on nature and climate issues) at all three Youth Fusion events (at Soham, Bottisham and Littleport), as well as a one-off stall in Ely Market Square. The animals voted upon were: bats; barn owls; toads/frogs; otters; hedgehogs; and bees.
- 3.59. Whilst there was a good spread of votes across all the animals, hedgehogs came out on top. This means we now kick off a series of activities, actions and education programmes, focussed on hedgehogs but at all times utilising that 'people's favourite' to help encourage and educate on wider habitat and biodiversity issues.
- 3.60. We are in the early stages of establishing what a comprehensive 'hedgehog recovery' programme will look like. However, an early opportunity could be the

creation of a short supplementary planning document (SPD), setting out guidance for developers to follow, so that new developments are built with hedgehogs in mind.

- 3.61. An SPD does not have the same weight in decision making as a Local Plan policy. In reality, it can only encourage developers to do certain things (whereas a Local Plan can require). Nevertheless, it can be prepared quickly and be used as a negotiating tool when discussing planning applications with developers. The policy measures it will include will be simple, cheap, but effective, such as simple hedgehog sized cut outs in a garden fence to create a 'hedgehog highway'. It is expected that most developers would be willing to implement such SPD expectations. Nevertheless, in the longer term, we can start to mandate such measures, and we can do this by transferring the SPD content into the Local Plan Climate Change and Nature Recovery Chapter.
- 3.62. Committee is asked to approve the principle of preparing such an SPD document; and if so, the intention is to bring a draft of that document to your next meeting so that it, too, can be subject to public consultation before adoption by around the middle of 2024.

4.0 ARGUMENTS/CONCLUSION(S)

- 4.1. The primary purpose of this agenda item is for Committee to give a steer as to what it would like to see in a new Climate Change and Natural Recovery chapter of a future Local Plan. Of course, today is not for making any final decisions, and there will be opportunities as the chapter progresses to refine what is included, taking account of public comments along the way. However, by giving a clear steer now, on matters of principle, will mean that officers can focus on those aspects that Committee would like to see included.
- 4.2. In the opinion of officers, if the aim of Committee is to utilise the planning system as much as it practically and viably can do to mitigate climate change and bolster the local natural environment, then the skeleton of a chapter as outlined at Appendix A is recommended to be taken forward as a starting point.
- 4.3. However, Committee will have to be mindful that if the Council does ultimately achieve a comprehensive chapter envisaged by Appendix A, then it is probable that, elsewhere in a future Local Plan update, we *may* have to seek from developers less of something else. For example, it *may* mean asking for slightly less affordable housing or some other aspect of a planning s106 agreement. This will be a matter for officers to test as we progress the chapter (and, in due course, progress a full Local Plan update), and such findings will be reported to Committee or (in the case of the Local Plan) Full Council, so that Members can make the final decision on policy content.
- 4.4. In addition, Committee is asked to approve the principle of preparing a short SPD on hedgehog recovery.

5.0 FINANCIAL IMPLICATIONS / EQUALITY IMPACT STATEMENT / CARBON IMPACT ASSESSMENT

- 5.1. In terms of the Local Plan chapter, directly there are no implications at this stage, because only a steer is being given by Committee rather than a firm decision. However, as the new chapter emerges, this will be tested thoroughly against the

various implications (financial / equality / carbon). These implications will be reported to Committee (and Full Council) as the policies emerge in detail.

- 5.2. In terms of the Hedgehog Recovery Supplementary Planning Document, there will be no financial implications, as the task will only require the use of existing staff time to prepare and consult on such a document. Any wider implications, such as on equalities or carbon emissions, will be considered at the point the document is prepared, but such implications are not likely to be significant.

6.0 APPENDICES

Appendix A: Recommended emerging skeleton Consultation Document, incorporating a Climate Change and Nature Recovery Local Plan Chapter

Background Documents:

None



East Cambridgeshire
District Council

**East Cambridgeshire
Local Plan – a
potential new Climate
Change and Nature
Recovery Chapter**

Stage 1 consultation

[add date]

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Glossary of Terms

At section 7 of this document is a glossary of terms. The Council recognises that it is important everyone has a common understanding of the challenges we face with climate change and nature decline, and the opportunities we have to meet those challenges.

However, the Council also recognises that the language around climate change and nature decline can be confusing. We hope the glossary assists your understanding, but please let us know if there are other words or phrases in this document that you are not fully clear on, and we will add it to the glossary in future documents. Please email climatechange@eastcambs.gov.uk

Foreword and Consultation Arrangements

East Cambridgeshire District Council has committed to strengthening its planning policies relating to climate change and the natural environment.

The Council intends to introduce a new chapter within its Local Plan to address those themes. That new chapter will be introduced alongside a wider update of the Local Plan.

This consultation document forms the starting point of engaging with the public and those involved in the planning system as to what sort of climate change and nature recovery related policies that new chapter could contain.

For the avoidance of doubt, the Council has not commenced a full review of its Local Plan yet. As such, this consultation stage is undertaken informally, so we get a head start for when we do commence a formal review of the Local Plan. Please only respond to the issues raised in this consultation document. Do not, for example, submit suggestions for new site allocations or other wider planning policy changes. Any such comments or suggestions will not be considered at this stage.

How to make comments

This is the first opportunity for you to make comments on an emerging Climate Change and Nature Recovery chapter. Please note that anybody can make comments.

The consultation document can be viewed at: [add link].

To respond, you can e-mail us at planningpolicy@eastcambs.gov.uk or post to:

Strategic Planning Team
East Cambridgeshire District Council
The Grange
Ely
Cambridgeshire
CB7 4EE

This first consultation will be for [xxxx] weeks. The start date for making comments is [date], and the closing date is [date]. Any comments received after this date will not be considered. Additional further rounds of consultation are anticipated, especially when we move the formal full Local Plan review consultation. Eventually, the full Local Plan review, incorporating the new climate change and nature recovery chapter, will proceed to an independent examination by an Inspector. However, this is not likely until at least 2025 or 2026.

Please note that representations received cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment. If possible, please do not include any telephone numbers or signatures as we do not require this information.

The Council respects your privacy and is committed to protecting your personal data. Further details on the Privacy Notices is available on our website <https://www.eastcambs.gov.uk/notices/privacy-notice>

Further information can be obtained from the Strategic Planning Team at the above postal address or:

Telephone: 01353 665555

Email: planningpolicy@eastcambs.gov.uk

1 Why are we doing this?

- 1.1 Taking climate change seriously and boosting the local natural environment is a key cornerstone of what East Cambridgeshire District Council is all about.
- 1.2 We have already declared a climate emergency and we have already recognised the global biodiversity crisis we face. We are therefore seeking all opportunities to help tackle those challenges, whether it is the way we operate the Council or manage our parks and open spaces, or how we encourage and support others to take steps, big or small, to support our environment.
- 1.3 We are also looking at all our policies and seeing where they can be amended to deliver gains for nature or help reduce carbon emissions.
- 1.4 The East Cambridgeshire Local Plan is one such policy document than can play a vital role in helping our district reduce its carbon emissions and reverse the decline in nature.
- 1.5 We want to work with you on establishing new planning policies, so that all new development that takes place in the district is seen as a gain for the environment, whether that's low or zero emissions because the new buildings are super energy efficient and generating their own energy needs; or making sure developers secure a clear and meaningful gain for nature after their development has finished, compared with what the land was like before they started.
- 1.6 Please do get involved in shaping a new planning policy framework which has the environment truly at heart.

2 Our commitment to the UN Sustainable Development Goals

- 2.1 In June 2023, the Council formally endorsed the United Nations Sustainable Development Goals, and agreed to seek alignment of the Council's policies and priorities, as and when these are updated, with the overall ambition of the 17 Goals.
- 2.2 The emerging policies and priorities in this document have a significant opportunity to align with several of the Goals. Full details of all 17 Goals are available here: <https://sdgs.un.org/goals>.
- 2.3 Of the 17 Goals, the Council considers the policies and proposals in this document align¹ with the following Goals in particular:
 - Goal 7 Affordable and Clean Energy
 - Goal 8 Decent Work and Economic Growth
 - Goal 9 Industry, Innovation and Infrastructure
 - Goal 11 Sustainable Cities and Communities
 - Goal 13 Climate Action
 - Goal 15 Life on Land



¹ Please note that it is only the Council's opinion that the policies and proposals in this document align with the above Goals. That view has not been independently verified by the United Nations or any other independent party.

3 What stage are we at?

- 3.1 This consultation document forms the starting point for engaging with the public as to what sort of climate change and nature recovery related policies a new chapter in the East Cambridgeshire Local Plan could contain.
- 3.2 It is not a formal stage in updating our East Cambridgeshire Local Plan. It is, instead, an informal consultation document. However, the comments we receive will be incredibly helpful as we move towards the formal stages of preparing a new Local Plan for East Cambridgeshire in due course.
- 3.3 As outlined in the indicative timetable below, a full update of our Local Plan will have a number of formal statutory stages, and these will take place over a number of years. This consultation document is taking place in advance of those formal stages commencing. This is your opportunity to feed into the Local Plan process at a very early informal stage, but, for now, we are only consulting on the topic of climate change and nature recovery.

	Stage	Description	Dates each stage is proposed to take place
Informal	Consult on informal draft climate / nature chapter	An informal public consultation stage, seeking public opinion on the possible content for a climate change and nature recovery related chapter which could be included in a future update of the East Cambridgeshire Local Plan.	This stage [add consultation dates]
Informal	Other	Other informal public consultation stages may take place before the formal steps below are commenced.	TBC
Formal	New Local Plan preparation commences	The Council must formally declare its intention to commence a formal full update of its Local Plan, and set a timetable for its production.	TBC
Formal	Public participation	There will be formal consultation stages on an emerging new Local Plan.	TBC
Formal	Independent Examination	After all the consultation stages have ended, the Local Plan will be independently examined by an Inspector.	TBC
Formal	Adoption	Provided the Inspector agrees, the updated Local Plan can be adopted by the Council and used to make decisions on planning applications.	TBC

Table 1: A summary table of the main stages in preparing a new Local Plan for East Cambridgeshire. Please note that this table does not identify all of the necessary legal steps that must be followed, and therefore should only be used as an indicative guide of the key stages.

4 Explanatory note for the content of this document

- 4.1 Starting on the next page, this document sets out possible new policies for inclusion in a new Climate Change and Nature Recovery Chapter of the Local Plan. It sets out the draft policy, plus some supporting text to explain the rationale for the policy.
- 4.2 Of course, wider policies in a Local Plan will assist sustainable development, and the themes of those policies are set out in the table below. However, **these policies are not included in this document** because they are already commonly found policies in existing Local Plans, and are highly likely to be included in a newly updated East Cambridgeshire Local Plan irrespective of the new climate change and nature recovery chapter. We will be updated all of these policies and consulting you on them in due course. However, we are not seeking comments on them as part of the consultation on this document.

Policy Theme	Example Policy Titles	Current East Cambridgeshire Local Plan 2015 Policy reference (if any)
Sustainable Growth	Location of Growth Across the District (locational strategy) Infrastructure Requirements Community Led development	GROWTH 2 GROWTH 3 GROWTH 6
Housing	Housing Mix Affordable Housing	HOU 1 HOU 3
Environment (wider environment issues)	Landscape / Townscape setting Water Efficiency / Flood Risk Designated Nature Sites (protection of) Pollution Green Belt Heritage issues	ENV 1 ENV 4 / ENV 8 ENV 7 ENV 9 ENV 10 ENV 11 to ENV 16
Community Services and Infrastructure	Community facilities Strategic Green Infrastructure Transport / Parking	COM 3 / COM 4 COM 5 COM 7 / COM 8

Table 2: A summary table of other policies which particularly help contribute to sustainable development, but which are not matters being consulted upon in this document. Such policies will, however, be included in a new Local Plan.

5 A draft *Climate Change and Nature Recovery* Chapter

The text below forms the draft text for what could be included in a new Climate Change and Nature Recovery chapter of our Local Plan. After each policy area, we ask a number of questions which we would be grateful for your comments.

Introduction

- 5.1 East Cambridgeshire District Council has long championed its desire to create a Cleaner, Greener East Cambridgeshire. The Council is committed to reducing its own carbon emissions and helping others reduce their emissions. It is also committed to reversing the decline in nature, by bolstering the natural environment on its own land holdings and encouraging others to take steps to support nature on their land.
- 5.2 Where it has the powers to do so, the Council is committed to putting in place policies which require others to take steps to help our local environment. The Council's Local Plan is one such important policy document, where it can take a stand and make sure new development that takes places in the district is built in a way which minimises carbon emissions and helps boost the local natural environment.
- 5.3 This chapter of the Local Plan has specific policies to achieve that.
- 5.4 This Council continues to support growth and new development in the district. But such growth should not come at a cost to our climate or the natural environment. We warmly welcome all developers and investors to East Cambridgeshire who align with our approach to protecting our environment.
- 5.5 However, to ensure all new development meets our aspirations, the policies in this chapter are purposefully written to *require* developers to do certain things. We could have written the policies in a way which *encouraged* developers to do certain things, but the risk would be that some developers would not rise to the challenge and only build 'basic' homes and other developments which did little to help mitigate climate change or assist nature recovery in our area.
- 5.6 We have put in place policies in this chapter which will result in new developments which are fit for the future, will not require expensive 'retro-fitting' by future occupiers, and which will have delivered substantial gains for nature in our local area.
- 5.7 New development in East Cambridgeshire will, via implementing these policies, be seen as a positive gain for our local environment, rather than a burden for our environment to shoulder.
- 5.8 Whilst this Local Plan cannot do everything (it especially has very limited influence over existing buildings, for example), it can ensure that new development, from the day this Local Plan has been adopted, be fit for a net zero carbon future, contribute to the transition to a net-zero carbon society, and be responsive to a changing climate.
- 5.9 Implementation of the policies in this chapter is new territory for East Cambridgeshire and such policies are not well established elsewhere in the country. As such, the Council is committed to working with all those involved in the planning system, and especially applicants, so that the policies of this Plan can be implemented smoothly and effectively. To help with this, we will publish a series of guidance notes or template forms, which will help applicants provide the right information first time, thus speeding up the process and providing clarity for all.

The Evidence Base

- 5.10 [text to be added].
- 5.11

Design Principles – Policy Climate&Nature1

- 5.12 [this will be an overarching policy requiring developers to demonstrate they have designed their development in a way which considers matters such as; orientation, form and fabric of buildings. It will also include measures to ensure buildings are resilient and adaptable to a changing climate.]
- 5.13 [after this policy, and each of the policies below, will be a series of questions, such as: Do you agree with the principle of having such a policy? Could the policy address additional matters? Is the policy too onerous for developers or not demanding enough?]

Reducing Energy Consumption – Policy Climate&Nature2 / Climate&Nature3

- 5.14 [this will likely be two policies, one for residential and one for all other buildings. In both cases, the policy will require developments to go beyond basic building regulations for energy efficiency. It will set specific figures for ‘space heating demand’ which means the amount of energy required to heat the home will be very low due to the high insulation used. An ‘energy statement’ will be required to be submitted to demonstrate requirements are to be met.]
- 5.15 [Where technical requirements are set, they will be aligned to the building regulations system or other widely available calculations, so applicants will not be considering a brand new or bespoke system just for East Cambridgeshire.]
- 5.16 [Very limited exception clauses might be included. For example, new development associated with a Listed Building might be exempt from certain measures, if it is demonstrated that applying the policy would cause unacceptable harm to the Listed Building]

Renewable Energy Generation – Policy Climate&Nature4

- 5.17 [this policy will set requirements for some energy to be generated by renewable sources on site, and preferably on each plot. Whilst it will not dictate the precise form of renewable energy, it is likely in the vast majority of instances to lead to PV solar panels on the roofs of most buildings. Only very exceptionally will a development be allowed to proceed with nil or very limited on-site renewable energy generation]

Biodiversity Net Gain – Policy Nature Climate&Nature5

- 5.18 [this policy will complement wider nature conservation policies in the Plan, but in this policy it will specifically seek a ‘net gain’ in excess of the mandatory minimum 10% gain arising from the Environment Act. Subject to evidence and consultation, it is likely that the figure will be set at or around a 20% net gain]

Hedgehog recovery – Policy Nature Climate&Nature6

- 5.19 [with East Cambridgeshire’s residents voting for Hedgehogs as their species of choice for recovery, this policy will require developers to have special regard to open space layout and garden design so as to encourage the free movement of hedgehogs (‘hedgehog highways’) and creation of habitats to meet their needs]

Supporting adaptation of existing buildings to meet the climate and nature challenge – Policy Climate&Nature7

- 5.20 [whilst the focus of this chapter, and the rest of a Local Plan, is in relation to new development, it is recognised that many existing homeowners or business will seek to undertake works to their existing property to help adapt to a changing climate, reduce their emissions and fuel bills, and/or help boost the local natural environment. This policy will encourage and support such measures, though of course cannot require such works to take place. Examples include supporting: repair rather than demolition; energy efficiency retro-fit proposals; community based / community supported

decentralised energy networks; circular economy based proposals; and carbon sequestration schemes]

6 Next Steps

- 6.1 Following consideration of your responses to this consultation, the Council will commence preparation of detailed evidence-based material so that the policies we put in place can be fully justified. Importantly, this will include testing the cost of implementing such measures on the overall build costs. This is important because we must ensure that new development will remain viable with the policies we have in place.
- 6.2 In due course, the Council will also formally commence a new Local Plan. As part of that process, it will make sure the policies in the Climate Change and Nature Recovery chapter compliment wider policies and proposals in the Local Plan.

7 Glossary of Terms

[to be added]

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