

Waterbeach Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or

neighbourhood.planning@scambs.gov.uk

All comments **must** be received by 5pm on Tuesday 13/20 April 2021.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scambs.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Waterbeach Neighbourhood Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Waterbeach Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	[REDACTED]	Agent's name:	Mr Bassil Aslam
Name of organisation: (if applicable)	n/a	Name of Agent's organisation: (if applicable)	Orchestra Land
Address:	[REDACTED]	Agent's Address:	Bridge House 25 Fiddlebridge Lane Hatfield Hertfordshire
Postcode:	[REDACTED]	Postcode:	AL10 0SP
Email:	[REDACTED]	Email:	[REDACTED]
Telephone:	n/a	Telephone:	[REDACTED]
Signature:		Date:	22 nd March 2021

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representat on number:

Part B – Your Response**What part of the Neighbourhood Plan do you have comments on?**

Policy or Paragraph Number (please state)	W21 and W23
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Object <input type="checkbox"/> Comment

Reason for Support, Object or Comment:

Please give details to explain why you support, object or have comments on the Neighbourhood Plan. If you are commenting on more than one policy or paragraph, please make clear which parts of your response relate to each policy or paragraph

If you consider that the referendum boundary should be extended, please outline your reasons.

Find attached response to NP policies W21 and W23.

Summary of Comments:

If your comments are longer than 100 words, please summarise the main issues raised.

- Objection to NP policies W21 and W23 due to their over reliance on the Waterbeach New Town project to deliver housing (private and affordable) on time. The NP does not factor in delays to housing delivery on the new town project due to its scale and complexity. Consequently, the delays will further exacerbate the delivery of much needed affordable housing for Waterbeach.

Completed forms must be received by 5pm on 13/20 April 2021 at:

Email: neighbourhood.planning@scams.gov.uk or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
 Cambourne Business Park, Cambourne,
 Cambridge, CB23 6EA



Our Ref: CB49311/NPC

19th March 2021

Dear Sir/ Madam,

RE: Response to Consultation on Waterbeach Neighbourhood Plan 2020-2031

This representation is submitted in response to the Waterbeach Neighbourhood Plan 2020-2031 (January 2021) Final Publication ('the WNP') and accompanying Evidence Base.

Orchestra Land have been working with the landowner in respect of land on the south side of Cambridge Road, Waterbeach, Cambridge for several years and have previously submitted representations on the landowners' behalf to the Strategic Housing Land Availability Assessment (SHELAA) in April 2019.

A Neighbourhood Plan needs to meet the following Basic Conditions set out in the National Planning Policy Framework and Guidance (NPPF):

1. The Neighbourhood Plan has regard to national policies and advice contained in guidance issued by the Secretary of State. (e.g., National Planning Policy Framework and Guidance)
2. The making of the Neighbourhood Plan contributes to the achievement of sustainable development.
3. The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
4. The making of the Neighbourhood Plan does not breach and is otherwise compatible with, EU obligations (particularly, the Strategic Environmental Assessment Directive, Environmental Impact Assessment Directive, and the Habitats and Wild Birds Directives).
5. The making of the Neighbourhood Plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010), either alone or in combination with other plans or projects.

For the reasons set out in this representation, our clients strongly object to the Neighbourhood Plan and consider it does not meet the Basic Conditions for the following reasons:

1. The Neighbourhood Plan does not contribute to the achievement of sustainable development as it does not positively plan for sustainable development;
2. It does not include proposals to meet an identified housing and affordable housing need separately from the New Town development;
3. It does not allocate land for housing development.



The BENP should instead be amended as follows:

- Available parcels in the parish should be allocated for housing developments to achieve the sustainability strategy;
- In turn, our client's land, as a sustainable location for development, should be allocated for residential use to meet identified housing needs.

Previous Representations

Orchestra Land is working with the owner of land on the south side of Cambridge Road, Waterbeach ('the Site') to promote residential development as part of the emerging Local Plan. The land is entirely in private ownership and there is no public right of access. It comprises an irregular shaped plot of land enclosed by Cambridge road and Car Dyke road. It benefits from surrounding public amenities while the location is quite sustainable, encouraging active forms of mobility.

Orchestra submitted a representation to the April 2019 SHELAA conducted to identify land available for development across Greater Cambridge. The submission proposed this site as a suitable, deliverable and sustainable location for a residential development of circa 140 houses. The Site would help to meet local housing needs now, rather than in the long term and could provide new pedestrian and vehicle connections.

Overview

Guidance and advice for the content of Neighbourhood Plans is contained in the National Planning Policy Framework (February 2019) (the 'NPPF') and Planning Practice Guidance (the 'PPG').

In respect of development, para 13 of the NPPF states that "*Neighbourhood Plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.*"

Paragraph 69 of the NPPF states that "*Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area*".

The PPG provides further guidance. Paragraph 009 (Reference ID 41-009-20190509) of the section on Neighbourhood Planning states that up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a Neighbourhood Plan contributes to achieving sustainable development.

Paragraph 74 (Reference ID 41-074-20140306) states:



“When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:

- whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with*
- the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy*
- whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy*
- the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach*

Housing Need

The NPPF also requires the preparation and review of all policies to be underpinned by relevant and up-to-date evidence.

The NPPF seeks the promotion of sustainable development in rural areas, and para 78 requires housing to be located where it will enhance or maintain the vitality of rural communities. In particular, it states that “Planning policies should identify opportunities for villages to grow and thrive, especially where they will support local services”.

Small Villages are sustainable locations that could be capable of taking additional growth. Para 68 of the NPPF requires strategic policies to “set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”.

In policy WAT 21 - Housing Mix paragraph 6.21 of the WNP states that 19,500 new are required to support the Cambridge Cluster during the plan period 2011 to 2031 according to Local Plan Policy S/5 Provision of New Jobs and Homes. Given the Waterbeach New Town development is being considered the main aspect of the district council’s strategy, 8,000 to 9,000 homes would be delivered in the parish during the plan period. The WNP suggests that housing and affordable housing need could be addressed through the New Town development.¹

It is evident that the WNP depends solely on the ability of New Town development for delivering the house demand identified. However, large sites like that, due to their scale and complexity, require thorough

¹ Waterbeach Parish Council . (2021). Waterbeach Neighbourhood Development Plan 2020 to 2031, p.108 114



planning and significant upfront capital investment. As there are several challenges to surpass in the initial stages, the delivery of new homes from large sites is significantly affected and usually delayed.

Planning consultancy Lichfields produced a report in 2016 titled "Start to Finish: How quickly do large scale housing sites deliver?" (November 2016). This report is frequently referenced by Inspectors at both appeals and in Local Plan examinations. The report found that 3.9 years was the average lead in time for large sites prior to the submission of the first planning application². *"The planning period (from application to decision) and the period between permission being granted and the first home being built depends on the complexity of the site, which frequently correlates with its size. The larger the site, the longer the planning application determination period."*

While larger sites have a higher delivery rate due to the number of stakeholders involved, it requires more time for the planning process and afterwards the construction phase to initiate. For schemes of 2000+ homes, the average planning approval period was 6.1 years and the average annual build rate 161 dwellings per annum. Thus, it is reasonable to suggest that for a scheme of 8,000 to 9,000 the planning approval period would be expected to be prolonged.

It is noticeable that the dependence on the New Town development does not address the pressing demand for housing in the short-medium term as the development of a site of such an area would take a great amount of time to be delivered.

Moreover, according to the demographic socio-economic review, Waterbeach is considered to have a high activity of workers flowing in the village from all other local authority districts in Cambridgeshire. Also, Waterbeach's population seems to comprise of people aged in their twenties and thirties and less of older generations (according to Census 2011). As stated in the WNP (p. 109, 6.21.6-7), community engagement that took place in November 2018 revealed an increased tendency of residents to remain at the parish and possibly purchase a property. Hence, there is a desire by the local population and people who commute to Waterbeach to live locally.

The sole reliance on the new settlement could be harmful for the future vitality of the village as new homes and places to live will no longer be delivered in Waterbeach village. It could lead to an alienation of the new settlement, and potentially encourage people to leave the village and move to the new settlement that will benefit from 'glamorous' new, purpose-built facilities and the like.

² <https://chfeds.uk/blog/2016/november/8/start-to-finish-how-quickly-do-large-scale-housing-sites-deliver/>



Thus, it is essential for the WNP to encourage residents to stay local and empower the existing community and the WNP sustainability and transportation core objectives. By providing residential opportunities through existing, available and sustainable sites, the council would create new neighbourhoods close to existing infrastructure and amenities. This would encourage residents to stay in the village and provide further funding (through S106/CIL and Parish Council precepts) to deliver new facilities and support existing facilities in the village. The alternative would be to lose these to the new town, and the village becomes a struggling dormitory.

Policies W21 and W23 should therefore be amended to reinstate minimum housing targets and allocate additional sites in the settlement.

Thus, the plan fails the basic conditions test as it does not contribute to the achievement of sustainable development being that it does not positively plan for sustainable development;

Affordable Housing

Policy W23 – Allocation of affordable housing at Waterbeach New Town describes the potential affordable housing that can be delivered through the development. The WNP expects a rate of around 200 new homes per year to be delivered once the construction phase is initiated, with 30% affordable and 30% of those being affordable rent.

Given that the Waterbeach New Town development is in the pipeline aiming to provide 8,000 to 9,000 homes, the WNP suggests that the affordable housing need could be addressed through the development. Priority for these affordable houses will be provided to residents associated with the area via employment, family or residence.

According to the Analysis of Local Housing Need (ALHN) in Waterbeach Parish (September 2019), local house prices both for purchase and for rent are unaffordable for many local people. This has led to a 'commuting drift' forcing local residents to travel southwards to Cambridge and London for work while local jobs are overrun by residents living to the north of Waterbeach where house prices are significantly lower.

The stock of affordable housing in Waterbeach has grown in recent years from 297 in 2011 to 337 in 2018. It is noted that demand for affordable housing in Waterbeach, similar to South Cambridgeshire, is very high. Over the period March 2008 and December 2013, there were 113 affordable rented properties become available in the parish. The Housing Needs Assessment has identified 126 households with a potential need for affordable rented accommodation and 14 households with a potential need for shared ownership or other forms of Low-Cost Home Ownership in Waterbeach. ALHN underlines that both quantities are likely to be depreciations.

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Based on the above and our argument regarding the inability of a large site to deliver in a reasonable amount of time and address the urgent need for housing in the locality, allocation of land for housing developments that would promote affordable housing in the short term should be included in policy W23. Assigning all expectations in the New Town will only amplify the housing issues.

Furthermore, people who work in Waterbeach and local residents are evidently willing to invest in the area; but the housing prices do not correspond to their salaries and force the workforce to live further afield. Therefore, it is crucial to provide opportunities that respond to the needs of these people – the alternative is not to provide (as the WNP is currently drafted) which restricts supply but does not address demand.

The WPN in policy W21 – Housing Mix mentions that 22,000 additional jobs are expected to be generated during the plan period 2011 to 2031 (Local Plan, Policy S/5 Provision of New Jobs and Homes). In order to: achieve Core Objective 7 regarding the protection and enhancement of existing employment in the village; respond to the expected influx of workers; and foster a sustainable and vibrant community; the WPN should overcome barriers caused by the cost of housing.

A more balanced approach that would help the village prosper, would be for the WNP to require additional allocations for the existing settlement allowing the Plan to meet its full Objectively Assessed Need (OAN) and for the village to grow and thrive as proposed in para 78 of the NPPF.

The site promoted by Orchestra would bring forward a residential development with affordable housing and new public access to Cambridge Road and Car Dyke Road - something which would meet with the requirements of the NPPF in terms of sustainable development.

The lack of allocations to meet the full OAN, combined with the failure of the plan to set Neighbourhood Plan targets means that the WNP fails the basic conditions test as it does not contribute to sustainable development.

If you require further information, then please contact me on the details at the head of this letter.

Yours faithfully

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

Yours sincerely

Bassil Aslam

Director of Land and Planning