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Sent by e-mail only to  
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19th April 2021

Dear Sir/Madam,

## **WATERBEACH NEIGHBOURHOOD PLAN REG.16 SUBMISSION CONSULTATION – RESPONSE BY ELY DIOCESAN BOARD OF FINANCE**

We are instructed by Ely Diocesan Board of Finance (EDBF) to respond to the Submission Version Reg.16 Waterbeach Neighbourhood Plan (Submission WNP). EDBF owns land off Glebe Road in Waterbeach, which is shown on the enclosed site location plan. EDBF has promoted this site for residential development, including the re-provision of allotments, through the emerging Greater Cambridge Local Plan process. The site would be directly affected by the proposed important open space designation of the Glebe Road Allotments site, but a promoted development at the site could deliver walking and cycling improvements associated with the proposed Waterbeach Greenway and could deliver additional housing and affordable housing including by Waterbeach Community Land Trust (CLT).

In February 2021, the Archbishop of Canterbury published 'Coming Home: Tackling the Housing Crisis Together', which set out the Church of England's vision to address current housing issues. The vision is based on five core values, which is that good housing should be sustainable, safe, stable, sociable and satisfying. In summary, the report recommends that the Church of England commits to using its land assets to promote more truly affordable housing. EDBF will take forward the recommendations in the report so that land and buildings it owns can be used for social, environmental and economic benefits. It is for this reason that EDBF has suggested in these representations that land off Glebe Road could be used in part for affordable housing to be delivered in conjunction with Waterbeach CLT.

The land owned by EDBF off Glebe Road has been promoted for through the call for sites process of the emerging Greater Cambridge Local Plan for residential accommodation including affordable housing and self-build/custom-build plots, with open space and landscaping, and improvements to site access. The site is located within the Green Belt. EDBF is requesting the site is released from the Green Belt through the Greater Cambridge Local Plan process. It is requested that support is given for the release of the site from the Green Belt in Submission WNP, so that in the future Waterbeach CLT could deliver affordable housing for local residents and Greater Cambridge Partnership could deliver the Waterbeach Greenway to improve walking and cycling infrastructure through the village.

### **Basic Conditions for Submission WNP**

In due course Submission WNP will be examined by an Independent Examiner. The examination for a neighbourhood plan considers whether specific basic conditions, as defined in Paragraph 8(2) of Schedule

4B of the Town and Country Planning Act 1990, have been met. The basic conditions relating to national policies and advice (a), sustainable development (d) and conformity with strategic policies (e) are relevant to these representations.

### **Adopted South Cambridgeshire Local Plan 2018**

The adopted South Cambridgeshire Local Plan 2018 contains a number of strategic policies that relate directly to matters covered in policies of Submission WNP. The strategic policies relevant to these representations are as follows:

- S/4: Cambridge Green Belt
- S/7: Development Frameworks
- S/13: Review of the Local Plan
- SC/8: Protection of Existing Recreation Areas, Playing Fields, Allotments and Community Orchards

In summary, the Green Belt and the Development Framework boundaries in the adopted Local Plan limit the extent of development around Waterbeach, and will restrict the possibility of any major new development coming forward in the future other than at the existing strategic allocation of Waterbeach New Town. The existing allotments off Glebe Road are already protected by a policy in the adopted Local Plan, and it is not necessary to duplicate policies or impose a more restrictive approach in policy.

### **Emerging Greater Cambridge Local Plan**

In Policy S/13 of the adopted Local Plan the Councils committed to undertake an early review, including to address matters related to housing need. A call for sites exercise and issues and options consultation for the emerging Greater Cambridge Local Plan has been completed. The issues and options consultation for the Greater Cambridge Local Plan asked questions about objectively assessed housing needs, future economic growth, the Green Belt including whether land should be released to meet development needs, growth at villages including Waterbeach, and existing adopted policies. It is the emerging Greater Cambridge Local Plan process that will deal with these strategic matters, including whether the technical evidence and assessment of options against sustainability objectives indicates that additional development should be directed to Waterbeach. It is considered that Waterbeach is a sustainable location for additional development, and that land should be released from the Green Belt to meet housing and affordable housing needs.

### **Representations to Submission WNP**

#### **Neighbourhood Plan Themes and Objectives**

The Themes and Objectives for Submission WNP seeks to support affordable, community-led and self-building housing for the village (Objective 10), and also supports improvements to the cycling and footpath network (Objective 2). EDBF supports these two objectives in particular, and broadly supports the other stated objectives. It is considered that the housing related objectives may not be met because there is no certainty that community land trust housing or self-build housing will be provided within Waterbeach New Town and no sites for such housing are allocated in Submission WNP. It is for this reason that EDBF is offering land off Glebe Road to assist Waterbeach CLT to provide affordable housing for local residents on part of the site. In order to deliver affordable, community-led and self-building housing for the village it is suggested that Submission WNP includes support for the allocation of sites that would provide such housing, including land off Glebe Road. It is noted that Submission WNP supports the principle of the Waterbeach Greenway project to improve routes for walking, cycling and equestrian use. The route for Waterbeach Greenway passes through EDBF's land off Glebe Road. It is considered that the Greenway route between Denny End Road and Glebe Road could be delivered in conjunction with development at the land off Glebe Road owned by EDBF, which would support the objective to improve the cycling and footpath network in the village.

#### Policy WAT1: Improving Connectivity

Policy WAT1 seeks to improve connectivity within the village, and this is supported. The supporting text to Policy WAT1 refers to the Waterbeach Greenway; Phase 2 of the Greenway seeks to connect Denny End Road and Glebe Road, with a route that passes through EDBF land off Glebe Road. It is noted that the Greater Cambridge Partnership has approved funding for Phase 1 of the Greenway project, which is expected to cover route design, statutory processes, and land procurement; past experience shows that the cost of transport infrastructure projects are typically higher than originally predicted and additional funding is required. There is no approved funding in place to deliver Phase 2 of the Greenway, including for the walking and cycling improvements on the proposed route between Denny End Road and Glebe Road. Item No.2 of Policy WAT1 refers to planning obligations as a means to improve walking and cycling infrastructure in the village. The two developments forming Waterbeach New Town would provide planning obligations to support Phase 1 of the Waterbeach Greenway project, as part of the transport mitigation strategy for these developments. Submission WNP makes no allocations for any types of development that could deliver planning obligations to support future walking and cycling improvements. It is unclear what, if any, funding might be available to support the delivery of Phase 2 of Waterbeach Greenway. It is considered that Phase 2 of Waterbeach Greenway and other future walking and cycling improvement projects in the village would not be delivered without additional development. The promoted residential development by EDBF off Glebe Road could support the delivery of the Waterbeach Greenway route between Denny End Road and Glebe Road in the future. The delivery of sustainable modes of transport with development is consistent with the recommendations in the Coming Home Report.

#### Policy WAT3: A Walkable Village and Walkable Neighbourhoods

Policy WAT3 seeks to support improvements to pedestrian routes and connections, and this is supported. It is acknowledged that the proposed Waterbeach New Town will deliver new pedestrian routes and improvements to the existing pedestrian network that are directly related to this development. As set out above, funding is available for Phase 1 of the Waterbeach Greenway project, which will deliver improvements to the walking and cycling network along that route. Phase 2 of the Waterbeach Greenway project includes a new walking and cycling connection between Denny End Road and Glebe Road, but there is no funding available to support this connection and no development identified that could support its delivery through planning obligations. The promoted residential development by EDBF off Glebe Road could support the delivery of the Waterbeach Greenway route between Denny End Road and Glebe Road in the future, and support the delivery of the aspirations of Policy WAT3 to improve pedestrian connections within the village. The delivery of improvements to pedestrian connections with development is consistent with the recommendations in the Coming Home Report.

#### Policy WAT9: Protecting and Enhancing PROW Network and Bridleways

Policy WAT9 seeks to protect and enhance the existing PROW network in Waterbeach, including public footpaths. There is a public footpath that crosses the EDBF land off Glebe Road – Footpath No. 247/1. EDBF is promoting the land off Glebe Road through the Greater Cambridge Local Plan process for residential development including affordable housing and self-build/custom-build plots and open space and landscaping. EDBF is committed to retaining a public footpath through the land off Glebe Road within the promoted development, and that the design and layout of the promoted development will respect and enhance the public footpath. The design and layout of the promoted development would be consistent with Policy WAT9.

#### Policy WAT18: Protected Open Space in Waterbeach

Policy WAT18 identifies a list of important open spaces within Waterbeach that are to be protected. The list includes Glebe Road Allotments, which are on land owned by EDBF. EDBF object to the designation of this land as protected open space. The land off Glebe Road is located within the Green Belt, and as such is already protected from inappropriate development by Policy S/4 of the adopted South Cambridgeshire Local

Plan 2018 and by national guidance contained in Section 13 of the NPPF. Policy S/7 of the adopted Local Plan defines development framework boundaries to identify areas within settlements and in the countryside. The land off Glebe Road is located outside the development framework for Waterbeach, and as such development is restricted to uses that are appropriate to countryside locations.

More importantly, Policy SC/8 of the adopted Local Plan already adequately protects existing allotments and sets out the circumstances where loss or replacement may be permitted. Policy SC/8 states:

*“Policy SC/8: Protection of Existing Recreation Areas, Playing Fields, Allotments and Community Orchards*

*Planning Permission will not be granted for proposals resulting in the loss of land or buildings providing for recreational use, playing fields or for the loss of allotments or community orchards except where:*

- a. They would be replaced by an area of equivalent or better quantity and quality and in a suitable location; or*
- b. The proposed development includes provision of open space, or sports and recreation facilities of sufficient benefit to outweigh the loss; or*
- c. An excess of provision in quantitative and qualitative terms is clearly demonstrated in all the functions played by the land or buildings to be lost, taking into account potential future demand and in consultation with local people and users;*
- d. Where replacement open space is to be provided in an alternative location, the replacement site / facility must be fully available for use before the area of open space to be lost can be redeveloped.”*

Policy WAT18 also seeks to protect allotments but is more restrictive than Policy SC/8 in terms of the circumstances where loss or replacement would be allowed. Section 3 of the NPPF provides guidance on plan-making, including for neighbourhood plans. Criteria (f) of Paragraph 16 states that plans *should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”*. It is considered that Policy WAT18 serves no purpose in terms of protecting allotments because it duplicates Policy SC/8 of the adopted Local Plan, and it is inconsistent with Policy SC/8 in terms of the loss or replacement of allotments. Therefore, Policy WAT18 is not consistent with national guidance and so does not meet Basic Condition (a) and is not in general conformity with strategic policies in the development plan and so does not meet Basic Condition (e).

**It is requested that Policy WAT18 is deleted, and that all references that identify Glebe Road Allotments as an important open space including Map 6.12 are also deleted.**

#### Section 6: Housing Policies

Policy WAT21 (Housing Mix) sets out the preferred housing mix for developments at Waterbeach New Town and elsewhere within the village. Policy WAT22 (Rural Exception Site Affordable Housing in Waterbeach) sets out the approach for the delivery of rural exception affordable housing in Waterbeach, and the supporting text to the policy refers to the work of Waterbeach CLT to bring forward affordable housing developments for those with a local connection. Policy WAT23 (Allocation of Affordable Housing at Waterbeach New Town) sets out the preferred approach towards the allocation of affordable dwellings at Waterbeach New Town to those with a local connection.

As set out in the Introduction to these representations, the Coming Home Report supports the delivery of affordable housing to meet the Church of England’s vision for housing. As such, EDBF supports the principles contained in Policies WAT21 and WAT22 to provide the mix, size and type of housing to meet local needs, including affordable housing. EDBF supports the aspiration of Waterbeach CLT to deliver more affordable housing for those with a local connection. The expectation that the Waterbeach New Town would deliver affordable housing for local residents, affordable housing for those with a local connection through a Waterbeach CLT scheme, and self-build housing is acknowledged. However, it is noted that the initial phases of the New Town is not required to provide any affordable housing, the development is intended to

provide for district-wide affordable housing needs and not just those with a local connection, it is not clear when Waterbeach CLT will have the opportunity to take on land within the development to deliver affordable housing for those with a local connection, and it is not clear when self-build plots will be available. It is very likely that it will take years for affordable housing, affordable housing for those with a local connection, and self-build plots to be provided at Waterbeach New Town. It is for this reason that EDBF suggests that land off Glebe Road could be used in part for a Waterbeach CLT scheme for affordable housing, and also the delivery of self-build plots and market housing. This outcome would meet the aspirations of Waterbeach CLT, and for EDBF it would be consistent with the recommendations in the Coming Home Report.

The land off Glebe Road will need to be released from the Green Belt through the Greater Cambridge Local Plan process before the promoted development by EDBF could be delivered. It is considered that development at the site would have no adverse impact on the compactness or setting of Cambridge and it would not lead to the merging of villages, and as such, the site makes a limited contribution to the purpose of including land within the Green Belt. The site is accessible to the good range of services and facilities provided in Waterbeach village. The site will be on the route of the proposed Waterbeach Greenway, which will provide cycle connections to Waterbeach New Town and to Cambridge in the near future.

**It is requested that support is given in Section 6 of Submission WNP for the release of land off Glebe Road from the Green Belt, to enable a Waterbeach CLT scheme for affordable housing, self-build plots, and market housing to be delivered within the village in the near future.**

We would be happy to meet with you, the Neighbourhood Plan Group and Waterbeach CLT to explore how the land off Glebe Road could be brought forward for the promoted development.

Can you please add my contact details to the consultation database for WNP, and keep me informed of progress with the document and the examination? Please let me know if you have any questions about the above response or require further information.

Yours faithfully

[Redacted signature]

**Brian Flynn MRTPI**  
Associate

E: [Redacted]

T: [Redacted]

Enc Site Location Plan – Land off Glebe Road, Waterbeach

Cc [Redacted], EDBF