

COMMENTS ON BEHALF OF

ON THE WATERBEACH NEIGHBOURHOOD PLAN SUBMISSION VERSION - APRIL 2021

POLICY	Previous Representations February 2020	New Comments
Policy WAT1 Securing connectivity between Waterbeach village and key destinations [formally WT1]	February 2020	Whilst Map 6.1 accompanying Policy WT1 [now WAT 1] has been modified (Consultation Statement change Ref WT1-6, pg. 120), the alignment still does not reflect that illustrated with in the SPD and through the plans accompanying the Outline and Reserve Matters Approval for Key Phase 1 of the Barracks and Airfield Redevelopment. The text supporting the recommended change in the Consultation Statement indicates that the map has been amended: "so that the indicative route illustrates more clearly the indicative route set out in the Waterbeach New Town SPD. Also clarify on the map
		Map 6.1 Indicative route for safe pedestrian and cycle link from Waterbeach village to Cambridge Research Park and Denny Abbey



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	February 2020	Policy WAT 1 has been amended as follows: Policy WAT 1 - Securing connectivity between Waterbeach village and key destinations including the New Town, employment sites and recreation facilities. 1. Development coming forward as part of the Waterbeach New Town will be required to make provision for: a) a direct, safe and high-quality segregated pedestrian and cycle route providing access for residents in Waterbeach village to shops and services provided at Waterbeach New Town and the planned relocated railway station; b) a footpath from the built-up area of the proposed Waterbeach New Town to Denny Abbey along the causeway; c) a direct, safe and non-motorised high-quality pedestrian and cycle link from Waterbeach village to Cambridge Research Park; and d) a direct motorised route for public transport vehicles only from Waterbeach village to Waterbeach New Town. This change (Consultation Statement change ref WT1-1, pg.66) has been made in response to a representation which indicated that greater priority should be given to non-motorised users and public transport rather than non-vehicular users. The amended text at (c) now lacks clarity, as a link cannot be created without crossing vehicular thoroughfares. This should be made clear. The text introduced at (d) is not consistent with the now approved Site Access Strategy for the Barracks and Airfield Redevelopment (approved as a condition 10 discharge on Outline Planning Permission (S/0559/17/OL)) and now being implemented. This Site Access Strategy provides for managed access but does not entirely preclude some access for private vehicles, which is necessary for some existing residential properties within the Barracks area (notably those on Orchard Drive and the Papworth blocks) and for emergency vehicles. The wording at (d) is not consistent with this and should be adjusted to reflect that there is some flexibility in the scheme being implemented.
Policy WAT 19 [formally WGI 18]	drainage basins from use as public open space and in doing so this Policy may inadvertently undermine sustainability objectives. Best practice in sustainable urban drainage (SUDs) involves the creation of a range of attenuation features. Many are attractive, naturalistic landscape features which offer benefits for wildlife and recreation (for example ponds, water gardens, rills). Some serve an attenuation function only occasionally and temporarily. These features add character, biodiversity and functionality to informal open spaces. If there is no scope for them to contribute to open space areas the policy may well discourage best practice in SUDs provision and result in more engineered high capacity solutions, which are less attractive, and without	There has been no change to the Policy which continues to be worded as follows: "To be accepted as an acceptable form of public open space provision, the space must offer usable recreational space. Drainage basins will not be accepted as a contribution towards public open space". Paragraph 6.19.2 of the supporting text has been updated to clarify that: "It [Waterbeach Heritage and Character Assessment] also identifies opportunities for improving the attractiveness of the recreation ground as an open space and it identifies examples of new development on Bannold Road where open space provision delivered as part of new development is limited in functionality (open space is solely limited to the provision of the drainage basins) and identifies a need for development to provide more practical and more useable open space. It is important that these open spaces are accessible to residents by reason of wellbeing and community interaction" In sepresentations have been noted. Further text has been provided to explain the rationale behind the policy. The ambition to avoid the provision of 'wet' drainage basins in isolation, which serve no other purpose, from being defined as public open space is accepted and acknowledged by U&C. Unfortunately, the policy as worded goes much further, and precludes recognition of drainage features that have dual purpose and can make a very positive contribution to amenity and well-being. For this reason, the February 2020 objection, reproduced in column 2, is maintained.
Policy WAT23 – Allocation of affordable housing at Waterbeach New Town [formally WH21]	dual purpose or sustainability benefits. The plan making body supported by others, including the Community Land Trust, have an ambition to support provision of homes for local people, including those in need of affordable housing. This has been translated into policies which seek to skew the mix and allocation of affordable homes delivered through Section 106 in the New Town to specifically favour those local needs over and above wider need within the District. The allocation of the New Town is a strategic policy in the adopted Local Plan. The allocation was made and justified with reference to meeting the housing needs and supporting economic growth across the District and the City as a whole (the two authorities having adopted a	February 2020 reps in relation to this policy have been noted (Consultation Statement, page 103). Policy WAT23 has been amended as follows: "To be supported, residential development proposals at Waterbeach New Town must make a meaningful contribution towards meeting affordable housing needs in Waterbeach parish. This means that people with a strong local connection to Waterbeach parish (through residence, employment or close family) whose needs are not met by the open market will be given priority of allocation (be first to be offered the tenancy or shared ownership of the home) for a proportion of affordable homes being delivered at Waterbeach New Town as follows: 100 of the first 200 affordable homes for rent within the first 5 years from the first new-build dwelling completed on site. 13 of the first 50 intermediate affordable homes within the first 5 years from the first new-build dwelling completed on site. If, after the first five years from the first new-build dwelling completion on site, the Waterbeach affordable housing needs, are not yet satisfactorily addressed, an appropriate local connection criteria should continue to be applied to a proportion of the affordable homes until it is.



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	joint trajectory for the delivery of homes and adopting a joint Housing Strategy). To allocate any affordable homes delivered through Section 106 obligation to those that would not otherwise qualify, or those who may qualify but not have priority for an affordable home, would prejudice others from outside the Waterbeach area in need, who have a reasonable expectation of priority based upon the adopted Local Plan and the Council's housing policies. This places the Neighbourhood Plan in conflict with the Local Plan; potentially impacts upon the ability of the Council to meet statutory obligations in relation to housing those in need; and impacts upon the individual rights of those on the Housing Register. It is for the South Cambridgeshire District	The above provisions will be subject to a cascade mechanism so that if a completed affordable dwelling has not been taken up with a reasonable time period it will be made available to address wider affordable housing needs. A proposal comprising a different percentage (to that set out in this policy) of affordable homes to be tied to a local connection criteria will be supported where this is justified through provision of up to date evidence on anticipated housing completion figures and affordable housing needs in the parish." The recognise that there is an understandable desire for local people to benefit directly from development occurring upon their doorstep. Nevertheless, the allocation of the Waterbeach New Town in the South Cambridgeshire Local Plan reflects a strategy to focus provision to meet housing need across Cambridge and South Cambridgeshire, in several strategic locations. In this context, the housing needs of all residents within the District and the City can be regarded as having equal priority. The redrafted policy maintains a level of local priority in conflict with the overarching Local Plan Strategy. It is for the District Council to address the implications of this position in their response to the Submission Neighbourhood Plan and consider the implications for the allocation of Affordable Housing to those most in need.
	Council to fully address this conflict.	