

20th April 2021
Our Ref: MC/14.623

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Dear Sir/Madam,

Re: Comments on Waterbeach Neighbourhood Plan (Regulation 16 – Submission Consultation Stage) on behalf of [REDACTED]

Introduction

[REDACTED] is continuing to progress proposals for development of land within the Neighbourhood Plan Area as part of the allocated Waterbeach New Town site, following its promotion through the Local Plan. At an Extraordinary Planning Committee held on 29th January 2021 South Cambridgeshire District Council resolved to grant outline planning permission, subject to completion of a Section 106 Agreement, for up to 4,500 dwellings and a range of other uses, supporting facilities and infrastructure (ref: S/2075/18/OL) for the eastern part of the new town. Additionally, they have secured full planning permission for the relocated railway station that is required by the new town allocations policy in the Local Plan (ref: S/0791/18/FL), the decision for which was issued on 9th January 2020.

As such, [REDACTED] has a keen interest in the emerging Neighbourhood Plan, with particular regard to ensuring that any overlap with the new town allocation is appropriate and compatible with the existing overarching policy framework, and with the shared objective of creating an effective relationship between the existing and new communities.

Set against this background representations were made on behalf of [REDACTED] in relation to the Regulation 14 – Pre-Submission Consultation Draft Neighbourhood Plan in February 2020, prefaced with comments on the appropriate legislative framework and relevant Practice Guidance. These remarks are repeated again here, for ease of reference.

The legislative framework for the preparation and making of Neighbourhood Plans is provided by The Town and Country Planning Act 1990 (as amended). Planning Practice Guidance provides guidance on the basic conditions that need to be met in order for a Draft Neighbourhood Plan to proceed to referendum, including the following:

“e. the making of the order (or 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).”



[Paragraph: 065 Reference ID: 41-065-20140306]

It goes on to expand on what is meant by the term “general conformity” as follows:

“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”*

[Paragraph: 074 Reference ID: 41-074-20140306]

Further guidance is provided on the issue of how policies in Local Plans are determined as being “Strategic” in this context, which includes whether the Local Plan in question explicitly identifies the policy as being strategic.

In this regard the South Cambridgeshire Local Plan (Adopted 27th September 2018) duly presents an assessment of those policies considered to be strategic for the purpose of Neighbourhood Planning, specifically at Paras. 1.19-1.20 and Appendix E, concluding that the vast majority of policies meet the relevant criteria.

This therefore includes the two principal policies related to allocation of Waterbeach New Town, as follows, although also extends to a wide range other relevant policies:

- Policy S/6 (within the Spatial Strategy Chapter) identifies “A new town north of Waterbeach” as one of “3 new strategic scale allocations” to meet the majority of the additional development needs to 2031 and beyond.
- Policy SS/6 (within the Strategic Sites Chapter) sets out detailed policies for the new strategic allocation at Waterbeach New Town.

The latter also refers to the requirement for preparation of a Supplementary Planning Document (SPD) to provide further guidance and detail on the implementation of Policy SS/6. This has subsequently been prepared and adopted (in February 2019) by South Cambridgeshire District Council, following public consultation.

It is acknowledged and welcomed that the Submission Consultation Draft Waterbeach Neighbourhood Plan recognises the basic conditions required of such plans, including the need for general conformity (at Para. 2.4) and that the Neighbourhood Plan cannot be used to stop development which is required of it by the district and national policy context (Para. 1.5).

Within the remainder of this statement representations on specific aspects of the draft Regulation 16 Neighbourhood Plan are set out, and should be read in conjunction with the accompanying response forms, for which one has been completed for each policy, objective or paragraph covered.

Comments on Pre-Submission Consultation Draft Neighbourhood Plan

Set against the context outlined above the following comments are made on behalf of [REDACTED], which it is requested be considered by the Examiner when examining the Waterbeach Neighbourhood Plan.

Paragraph 3.11

At Regulation 14 stage we noted in relation to **Page 11. Second Paragraph (3.10)** that this should refer to Fen Edge Area comprising Station Quarter, Fensteads and Fenland Parks; as well as suggesting that this passage should refer to the relocated station as having been consented (highlighting that the decision notice for this was issued in January 2020).

In respect of the former issue Paragraph 3.11 in the Regulation 16 document now states “*They refer to their scheme as Fen Edge Area comprising Station Quarter, Fensteads and Fenland Parks.*” It is considered that this is a fuller and therefore more accurate description of the character areas within the Waterbeach New Town East development, and we are grateful that our previous comments have been reflected.

In respect of the station reference it is similarly noted that Paragraph 3.11 in the Regulation 16 document now states “*This was approved on 9 January 2020*” and therefore we are content that this aspect has also been addressed.

Additionally, however, we would highlight that no reference has been made within the latest consultation document to the [REDACTED] Outline Planning Application (ref: S/2075/18/OL) having now achieved a resolution to grant permission (subject to completion of a Section 106 Agreement) at committee on 29 January 2021. No doubt this was a consequence of timing, with the consultation getting underway shortly after this, but for completeness, and to ensure that the document is as accurate and up to date as possible, it is considered that the application reference and status of the application should be included.

Objective 1.v

At Regulation 14 stage we suggested changing this to read: *There should be safe, attractive and direct routes between the Village and New Town prioritised for non-motorised users.*

It is noted that no change has been made in this regard within the Regulation 16 version, and this continues to read: *There should be safe, attractive and direct non-motorised vehicular routes between the two communities.*

To clarify, the rationale for our previous comments is that there will be direct vehicular access (alongside pedestrian and cycle links) between the village and the relocated railway station, as allowed for by the station permission, and indeed it will also be desirable for there to be other direct public transport connections. This is also in line with clause 3 of Adopted Local Plan Policy SS/6 which states that “*Appropriate integration should be secured by the provision of suitable links to enable the residents of Waterbeach village to have convenient access to the services and facilities in the new town but with limited and controlled opportunities for direct road access from the wider new town to Waterbeach with emphasis on connections by public transport, cycle and on foot.*” It is considered that the current wording of this objective in the Neighbourhood Plan is not entirely consistent with the Local Plan, through the apparent exclusion of any motorised vehicle connections, which ought to be allowed on a limited and controlled basis.

We therefore wish to re-iterate these previous comments and suggest changing Objective 1.v to read: *There should be safe, attractive and direct routes between the Village and New Town prioritised for non-motorised users.*

Objective 1.vi

At Regulation 14 stage we stated in respect of **Page 24. Objective 1.iv**: This statement is confusing. It says vehicle access should be convenient but not direct. It is considered that this would benefit from clarification.

Firstly we should clarify that the reference stated should have referred to Objective 1.vi and apologise for the apparent “typo” and any subsequent confusion that may have been caused.

We do, however, wish to re-iterate the view that the statement under Objective 1.vi is confusing, in asserting that vehicle access should be convenient but not direct, and would benefit from further explanation. In this regard, and as noted in connection with Objective 1.v, we would highlight the specific example of direct vehicular access for village residents to the relocated railway station, allowed for under the station planning permission, and in turn also the reference within Local Plan Policy SS/6 3 to direct road access on a limited and controlled basis.

Core Objective 2

It is noted that no change to the wording of this passage has been applied to the Regulation 16 version subsequent to our comments at the Regulation 14 stage (in respect of **Page 27. Second Bullet**) that this should refer to prioritising non-motorised users and public transport rather than non-vehicular routes.

As such, and consistent with our comments above in respect of the wording on vehicular connections between the village and the new town, we wish to re-state the view that this should refer to prioritising non-motorised users and public transport rather than non-vehicular routes.

WAT 1 - Securing connectivity between Waterbeach village and key destinations

At Regulation 14 stage we commented in relation to **Page 31. Policy WT1. 1.a** that this should refer to prioritising non-motorised users and public transport rather than segregation, noting that the design approach is yet to be agreed and is subject to technical constraints.

This policy has been re-numbered as Policy WAT 1 in the Regulation 16 document, although it is noted that no change has been made to the wording of 1.a.

Addition of sub-paragraph d: *“a direct motorised route for public transport vehicles only from Waterbeach village to Waterbeach New Town”* has however been made, which is welcomed in acknowledging the ability for direct public transport connections.

Consistent with our comments on other similar aspects, we wish to re-state our view that this should refer to prioritising non-motorised users and public transport (as has indeed been added) rather than segregation. Notwithstanding that SCDC have resolved to grant outline planning permission for the [REDACTED] site, which does include some access parameters (and indeed has already approved the station application), the detailed design approach for the wider Waterbeach New Town East development is yet to be agreed and is subject to technical constraints.

It is noted that the status of the [REDACTED] application, as referred to above, also needs to be updated within supporting para. 6.1.10, which states: “The remainder of the Waterbeach New Town strategic site is subject to a separate planning application from [REDACTED]”, to which we would suggest adding, “in respect of which SCDC resolved to grant outline planning permission on 29 January 2021.”

It should also be acknowledged that the station full planning permission secures access from the village to the relocated station, allowing for pedestrian, cycle, public transport and motorised private vehicle connection. Furthermore the configuration of the access road also allows for up to 50 dwellings within the new town development to also be accessed from the consented station access road, once the A10 access is in place.

WAT 4 - Creating and maintaining sustainable access routes to Waterbeach village Primary School

In response to the Regulation 14 consultation we noted in respect of **Page 38. Policy WT4. 2** that Cody Road, Bannold Road and Way Lane (along with High Street) were identified as priority walking to school routes, along which increases in vehicular movements arising from proposals in the Plan area would be resisted unless accompanied by pedestrian and cycle prioritisation measures. We highlighted that it should be recognised in this regard that the consented relocation of the station utilises parts of these routes for village access to the new station, including approved highway works, and also that a financial contribution to further works along Way Lane and St Andrews Hill has been secured in association with this planning permission, and could be used to implement such pedestrian and cycle prioritisation measures.

It is understood that this has now been renumbered as Policy WAT 4 within the Regulation 16 document and is noted that sub-paragraph 1. also now includes reference to Denny End Road,

Station Road and Cambridge Road in addition to those previously listed. Routes shown on Map 6.3 have been extended accordingly, and in fact seem to encompass further areas (or portions of the roads specified). There have been no changes proposed to the wording of sub-paragraph 2.

In response we wish to re-iterate that it should be noted that the consented relocation of the station utilises parts of these routes for village access to the new station, including approved highway works, and furthermore that a financial contribution to further works along Way Lane and St Andrews Hill is also secured in association with this planning permission, and could be used to implement such pedestrian and cycle prioritisation measures.

At the same time it is considered that extension of the area of walking to school routes shown within the associated plan requires further justification, having particular regard to the longer sections of Denny End Road and Bannold Road now included.

WAT 5 - Creating and maintaining sustainable access route to Waterbeach New Town schools

At the Regulation 14 consultation stage we set out in response to **Page 39. Policy WT5. 2** that, while supporting the overarching objective of providing safe and attractive walking and cycling routes to schools, reference to *“not locating school entrances on through routes”* was felt to be too restrictive. It was highlighted that reference to *“avoiding the need to cross primary and secondary roads to access school sites”* will not be possible for all residents, and it was suggested that these requirements should be removed, and reference made to the need to devise an appropriate design response for each school site.

It is understood that this has now been renumbered as Policy WAT 5. Sub-paragraph 1. now states *“Proposals which help to create and maintain pedestrian and cycle priority routes to and from Waterbeach New Town schools and discourage drop-off and pick-up by car outside Waterbeach New Town schools will be supported.”*

Sub-paragraph 2. has also been slightly re-worded to be less restrictive, requiring: *“the need for children having to cross primary and secondary roads to attend school is minimised and preferably avoided altogether”*.

In light of these revisions we wish to re-state that the overarching objective of providing safe and attractive walking and cycling routes to schools is supported. It is welcomed that some revisions to this policy have been made, in respect of avoiding the need for children having to cross primary and secondary roads to attend school being “minimised”, although it is considered that elements of this policy remain too restrictive, including reference to “not locating school entrances on through routes”. These requirements should be removed, and reference made to the need to devise an appropriate design responses for each school site.

WAT 14 - Waterbeach design principles: WDP 1

At the Regulation 14 consultation stage we commented as follows in respect of **Page 66. WDP1**: The first part of this principle is supported. The second part could lead to unintended consequences.

Scope must be left in architectural detailing to embrace new technologies, improve environmental performance and define areas of varying character, both of which are essential in achieving the vision for Waterbeach New Town and respecting the villages own identity.

It is noted that that the equivalent passage in the Regulation 16 version has been slightly reworded: “They should have strong attention to architectural detailing complementary to the distinctive character of Waterbeach” (previously “typical of”).

Whilst this amendment does provide a degree of further flexibility it does not necessarily address our previous representations explicitly.

It is acknowledged that the Regulation 16 document does however refer to innovation at WDP14 as follows: “Opportunity for innovation and the creative interpretation of the design principles is encouraged, so long as the design enhances the distinctive character of Waterbeach. In the case of development coming forward as part of Waterbeach New Town, proposals should respond sensitively to the open Fenland character which surrounds it.”

However, we wish to re-state our view that there remains potential to make this more flexible through specific reference to the scope to embrace new technologies, improve environmental performance and define areas of varying character, all of which are essential in achieving the vision for Waterbeach New Town and respecting the village’s own identity.

WAT 14 - Waterbeach design principles: WDP 4

In respect of the Regulation 14 Neighbourhood Plan we made the following comments on **Page 66**.

WDP4: This principle is potentially contrary to the Waterbeach New Town SPD which describes the approach to building heights and massing. It is important to acknowledge that new development is seeking to deliver something of the scale and character of a new town (not a continuation of the village character) and that building form will reflect this.

It is noted that the application of the design principle has been clarified within the Regulation 16 document as follows: “*Applicable for all development in all locations. With respect to the Waterbeach New Town it is acknowledged the new town will have its own identity separate to that in Waterbeach village but, nevertheless, and in keeping with Policy SS/6 of the Local Plan, the design approach should be an appropriate response to existing local character including that in Waterbeach village.*”

We wish to acknowledge that the additional text relating to Waterbeach New Town is a positive amendment in presenting and clarifying this distinction. However, it is considered that there remains potential to strengthen this through reference to the Waterbeach New Town SPD and in turn possibly also to the relevance of the parameters established through the respective outline planning permissions that will govern some aspects of how this principle is applied.

WAT 21 - Housing mix

At Regulation 14 stage commented in relation to **Page 89. Policy WH19. Second bullet point** our view that: Flexibility should be added to the statement that 40% of market housing and a majority of

the affordable housing properties to comprise 1 or 2 bedroom homes to reflect changing needs over time and to allow an appropriate mix to be defined spatially across the New Town.

It is noted that this has now been renumbered as Policy WAT 21 and updated to reflect the SPD, whilst supporting text (at paras. 6.21.14 and 6.21.15) acknowledges the situation agreed for U&C and the resultant need for flexibility to reflect viability and agreement on a case by case basis.

No reference is, however, made to the headline terms agreed in the context of the [REDACTED] committee resolution, which could be added in for completeness and the avoidance of doubt in this regard.

It is therefore considered that Policy WAT 21 needs to be strengthened further with reference to viability, meeting changing needs over time and the headline terms agreed in the context of the [REDACTED] resolution.

Should you have any queries on the comments set out above please do not hesitate to contact me.

Yours faithfully,

[REDACTED]

Matt Clarke
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