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and Peterborough

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19<sup>th</sup> April 2021

Ms Alison Talkington  
GC Shared Planning Policy Team  
South Cambridgeshire District Council  
Cambourne Business Park  
Cambourne  
CAMBRIDGE  
CB23 6EA

By email to: [neighbourhood.planning@scambs.gov.uk](mailto:neighbourhood.planning@scambs.gov.uk)

Dear Ms Talkington,

**Ref: Waterbeach Neighbourhood Plan Pre-Submission Consultation**

CPRE welcomes the opportunity to comment on the Waterbeach Neighbourhood Plan (WNP) Pre-Submission Consultation. We note that there are seven main areas identified by the community which translate into the policies that shape the plan. CPRE note the evidence based supporting documents giving weight to the policies which are mentioned later in this response.

CPRE notes that the vision and policies have been shaped by the communities in the Parish as evidenced in the Consultation Statement that accompanies and supports the WNP.

CPRE notes that the WNP was written in accordance with the adopted, 2018, South Cambridgeshire District Council Local Plan, the National Planning Policy Framework, (NPPF) and planning policy guidance.

1. **Growth.** Waterbeach Parish has recently grown by approximately five hundred dwellings, mainly in the Bannold Road area due to speculative development because of the lack of an adopted Local Plan.

Waterbeach Parish will also be absorbing the settlement of Waterbeach New Town Policy SS/6 in the adopted 2018 Local Plan. Although 8,000 to 9,000 dwellings with ancillary buildings form Policy SS/6 Planning applications have been granted for 6,500 dwellings on the Barracks land site and 4,500 dwelling on adjoining greenfield land totalling 11,000 dwellings.

CPRE note that because of the recent and proposed growth in the Parish CPRE believe it is essential that the residents of Waterbeach and Chittering have their say, once the Neighbourhood Plan is “made” when planning applications come forward in the Parish.

2. **Policies.** CPRE support the policies identified by community through various consultations with the Neighbourhood Plan Steering Group to protect the village character, heritage and adjoining low lying fens and chalklands to the South, East and North of the Parish. It is also important to protect the village heart and conservation area plus local formal and informal green space as it is currently under provided for per resident.

CPRE believe It is important to ensure connectivity within the village and links with the New Town providing green and affordable sustainable transport. It is also important for pedestrians, wheelchair and mobility scooter users, cyclists and horse rider to have safe routes for leisure and connectivity.

CPRE notes the considerations made regarding the education policies in the WNP to ensure a safe and enjoyable place for children and young adults to study and grow and that provision is made to enable this.

CPRE believe is important that a fair and balance housing mix is achieved as identified in the Housing Needs Assessment Report and housing policies. It is also important that:

- affordable housing of 40% is ensured in accordance with the NPPF,
- a Community Land Trust is accommodated to give local people the chance to remain in the Parish in perpetuity
- social housing should be available in the mix.

CPRE believe that, as identified in the WNP, facilities and services which enable people to live and work in the Parish if they so should be ensured.

3. **Green Belt.** The Cambridge Green Belt wraps around Waterbeach to the South and East of Waterbeach village. The National Planning Policy Framework states:

NPPF 133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.

NPPF 134. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up area,
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Greenbelt Policy S/4 South Cambridgeshire District Council adopted Local Plan 2018 Chapter 2 Spatial Strategy states as follows:

*“Cambridge Green Belt A Green Belt will be maintained around Cambridge that will define the extent of the urban area. The detailed boundaries of the Green Belt in South Cambridgeshire are defined on the Policies Map, which includes some minor revisions to the inner boundary of the Green Belt around Cambridge and to the boundaries around some inset villages. New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework paragraphs 2.31 and 2.32 further evidence policy S/4 as to the importance of the Cambridge Greenbelt.”*

CPRE considers it imperative that protection of the Greenbelt around Cambridge, the smallest in England, is ensured in accordance with the NPPF and in accordance with the published objective of the Green Belt Local Plan *“To preserve the special character of Cambridge and its setting”*. This being an addition to the more usual objectives which are also contained in the Green Belt Local Plan as follows:

*“To control the urban expansion of Cambridge;  
To allow for the development of communities in accordance with Structure Plan policies;  
To prevent the further coalescence of settlements;  
To enhance the visual quality of the area;  
To balance the provision of suitable recreational and leisure facilities against the needs of agriculture”.*

All over the England, non-statutory Green Belts are being constantly eroded. Planning permissions are refused and then suddenly, usually for questionable reasons, the boundaries are re-drawn and a well-connected development proceeds.

We urge the Cambridge authorities not to start acting in a similar manner with the Statutory Green Belt around the setting of the world-class academic jewel which is the City of Cambridge.

Research published in May 2020 by CPRE and the National Federation of Women's Institutes demonstrated just how important green spaces, including the Green Belts, have been to retaining health and well-being during the current pandemic.

CPRE consider that this is actually a constant benefit which has been highlighted by the pandemic and therefore it is important that every effort should be made by planning authorities to protect Green Belts and prevent negative effects upon them.

Further research published in June 2020 and commissioned by the CPRE and the HomeOwners Alliance, found that 68% of people living in the East of England think their local green spaces could be enhanced.

CPRE is very concerned by the weak and potentially ambiguous wording of Policy S/4.

4. **Landscape Character and Heritage.** The Parish of Waterbeach sits on the edge of the fens looking out to the North, the East and the South across low lying fertile, food producing farmland, grazing marshland and willows that characterise the local landscape. Close by the important Heritage sites of the Car Dyke Roman Canal and Denny Abbey add to the rich tapestry of people and the land forged by generations and natural events. CPRE believe that the accompanying Character and Heritage Assessment and Design Principles Documents are key when the Planning Authority consider any future planning applications that come forward for approval in order to ensure the sensitive local setting of the Parish is sympathetically considered.
5. **Biodiversity and Heritage.** The ecological biodiversity and its connection with heritage within the Parish as identified in the WNP and supporting documents. The River Cam forms a natural boundary with its own character and biodiversity to the East of the Parish. County wildlife sites, the RAMSAR Cam Washes, Wicken Fen, the Wicken Vision, the Old West River, the applied for Great Ouse AONB, the proposed Fen Biosphere and the significant heritage sites of Car Dyke and Denny Abbey all contribute to the bio-diversity of the surrounding landscape. It is very clear that this is a location where bio-diversity is inextricably bound to heritage. It is therefore of major importance that the this link between biodiversity and heritage is given great weight when future planning applications are being considered.
6. **Climate Change & Water.** CPRE welcomes the fact that the WNP will follow the policies and adopted strategies of the Local Authority to manage the challenges of climate change such as flooding and drought. With rising sea levels, more intense rainfall and increased run-off from upstream developments, Cottenham Lode has is incurring increased occurrences of flood warnings. Waterbeach village has experienced flooding as recently as winter 2020/21. The Greater Cambridge area is already in water stress and the Integrated Water Management Study by Stantec for the Greater Cambridge Partnership, published in November 2020, has identified that only the lowest level of development around Cambridge would be sustainable and that even this would require "*interim mitigation measures*". CPRE wishes to emphasise the importance that local authorities must give to flood risk and water supply when ensuring that the WNP is adhered to and the Parish is properly consulted with as Waterbeach New Town is built out.
7. **Greenhouse Gas Emissions.** CPRE is aware that strategies and policies are being adopted by the District Council with the objective of ensuring net zero carbon emissions in order to reduce Climate Change. CPRE would point out that carbon dioxide is not the only greenhouse gas and that as much if not more weight should be applied to reducing methane emissions which are a far more potent greenhouse gas. It is hoped that positive, effective enforcement of these initiatives and any resulting policies will be applied as planning applications come forward in the Parish.

8. **Visions.** Both SCDC and Waterbeach Parish Council have visions that shape the Local Plan and Waterbeach Neighbourhood Plan.

Policy S/1 South Cambridgeshire District Council adopted 2018 Local Plan Vision *“South Cambridgeshire will continue to be the best place to live, work and study in the country. Our district will demonstrate impressive and sustainable economic growth. Our residents will have a superb quality of life in an exceptionally beautiful, rural and green environment.”*

WNP Vision: *“Our Neighbourhood Area will continue to be a great place to live and work by ensuring that the identity and character of the existing communities within the Parish are respected and protected. The plan will ensure that any new development in the Neighbourhood Area will provide sustainable infrastructure. It will ensure the improvement of the overall quality of life of every resident. New development should not be overbearing or overwhelming and should complement the rural vistas and existing Fen Edge landscape.”*

CPRE recommend that Policy S/1 will be considered in conjunction with the WNP Vision when new planning applications come forward in the Parish.

9. **Supporting Documents.** As previously mentioned CPRE note that the WNP includes evidence-based supporting documents to inform the policies contained within the plan as follows:

- Strategic Environmental Assessment,
- Waterbeach Design Principles,
- Waterbeach Heritage and Character Assessment
- Waterbeach Housing Needs Assessment Report
- Demographic Socio- Economic Evidence Consultation Statement
- Housing Needs Assessment
- Statement of Community Engagement

CPRE considers that reports such as the Strategic Environmental Assessment, Waterbeach Design Principles and the Waterbeach Heritage and Character Assessment form material considerations in planning terms and should be consulted upon by officers when planning applications come forward in the Parish even though the WNP is not yet “made.”

CPRE Notes that once the WNP has passed successfully through the Inspection phase more weight will be given to it when considering planning applications that come forward in the Parish.

**Summary:**

CPRE supports the Waterbeach Neighbourhood Plan as a means for the Parish to positively engage with the planning authority and developers.

CPRE believes it is important that once “made” SCDC, developers and Waterbeach Parish Council, through the WNP and other initiatives, work together to ensure future development is managed, monitored, and enforced to future-proof the Parish for existing and future residents including all those who live and work in the Parish.

CPRE support the policies and holistic approach of the WNP and the vision that the Parish will be a place where people live, work and grow whilst maintaining the village character, respecting and enhancing the natural environment, the landscape and the flora and fauna that live within it.

Yours sincerely,

  
**Chairman on behalf of CPRE Cambridgeshire and Peterborough**