### Waterbeach Parish Council

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Greater Cambridge Shared Planning Service

C/O South Cambridgeshire District Council

South Cambridgeshire Hall

Cambourne Business Park

Cambourne

**CAMBRIDGE** 

CB23 6EA

13<sup>th</sup> December 2021

Attention: Greater Cambridgeshire Planning

# RE WATERBEACH PARISH COUNCIL – RESPONSE TO LOCAL PLAN – GREATER CAMBS PLANNING

Waterbeach Parish Council would like to make the following comments to the Greater Cambridge draft plan consultation concluding on Monday 13<sup>th</sup> December 2021

The Greater Cambridge draft plan states the following proposals for the acceleration of delivery of Waterbeach New Town as detailed below:

https://maps.3csharedservices.org/portal/apps/webappviewer/index.html?id=a6742a84b6 aa418f8b1e41315c2b8845

#### **Preferred Options Sites - August 2021**

Broad location New settlements

Preferred Option reference S/NS/SS/6

Site Waterbeach New

Town

Use Mixed Use

New or existing allocation Existing

Housing delivery 2020-41, counted as current pipeline (adopted allocations, 4,580

existing permissions and windfall allowance)

Housing delivery 2020-41, counted as increased delivery rates/densification 750

on existing allocations

Housing delivery 2020-41, counted as proposed new site allocations

Housing delivery post-2041 5,670

Housing delivery Full Build Out (2020 onwards) 11,000

Employment use classes E(g)

Area (ha) 427.49

Although Policy SS/6 Waterbeach New Town (WNT) in the SCDC 2018 adopted local plan for approx. 8,000 – 9,000 dwellings.

Nevertheless, planning approval (S/0559/17/OL) granted to the MOD & Urban & Civic for WNT (West) for 6,500 dwellings. Planning approval (S/2075/18/OL) "currently awaiting decision" RLWE Waterbeach (East) for 4,500 dwelling making a total of 11,000 dwellings plus associated buildings and infrastructure.

Policy SS/6 South Cambs District Council (SCDC) 2018 adopted local plan Page 7 1 3.41 states:

A new town will require a significant amount of new infrastructure, including schools, shops, services and facilities to meet the needs of the town. It is important that the services, facilities, landscape and infrastructure needed by this development are not only provided to a high quality, but that they are properly and effectively implemented, managed and maintained if they are to meet the needs of the community as they arise and in the long term.

3.42 A fundamental requirement for this site is that it will be highly accessible and permeable to all its residents on foot, by cycle and public transport, to support sustainable transport, recreation and health. The site offers particular opportunities to deliver public transport improvements, including the relocation of Waterbeach railway station to a location where it will also be convenient for people living in Waterbeach village making rail travel highly attractive. Segregated provision for buses both within the town and to link the new town to the public transport network in Cambridge will be required and similarly for cycle use. This will provide for quicker journeys, encourage maximum use by residents of the new town and improve safety. The existing A10 is at capacity and road improvements will be required, including measures to address capacity at the Milton junction with the A14

WPC seek to know if policy SS/6 in the SCDC adopted local plan will be carried forward into the new local plan.

South Cambridgeshire Adopted Local Plan 2018 (scambs.gov.uk)

The Waterbeach SPD adopted by SCDC in February 2019 provides strategies as to how the New Town will progress including required infrastructure and responsibilities of developers and utility providers. S106 agreements have been formalised between SCDC and MOD/Urban & Civic. S106 agreements between SCDC and RLWE now at the draft stage. But the parish council have still not had opportunity to comment.

WPC note that in the GC draft local plan states

"The Supplementary Planning Documents for Land north of Waterbeach will be carried forward." SCDC adopted local plan Policy SS/6 - page 70 para 17 states:

Supplementary Planning Document: The SPD to be prepared for the Strategic Site shown on the Policies Map will provide further guidance and detail on the implementation of Policy SS/6. The SPD will include: a) An overarching, high level vision for the new town. b) Consideration of relevant context including key constraints and opportunities. C) The broad location of the components of the new town which are essential to support comprehensive and seamless development. A spatial framework diagram will be included that ensures the creation of a sustainable, legible and distinctive new settlement. d) The location, nature and extent of any formal open space to be provided outside of the Major Development Site. E. Broadly how the development is to be phased, including the delivery of key infrastructure

https://www.scambs.gov.uk/media/13057/waterbeach-new-town-spd-low-res-feb-2019.pdf

WPC would like to highlight the following identified issues as barriers to growth in the current adopted and emerging local plans that will need overcoming in a timely and fully funded manner, at least cost and disruption to the residents of Waterbeach parish and neighbouring villages.

#### 1. Provision of Water

Cambridge City and South Cambridgeshire already have an unsustainable supply of potable water. In August 2020, the Environment Agency, in response to a query on the viability of water supply to Northstowe Phase 3A wrote to a resident that 'current levels of abstraction are causing environmental damage.

Any increase in use within existing licenced volumes will increase the pressure on a system that is already failing environmental targets', and 'many waterbodies did not have the flow to support the ecology.' This is the situation for proposed growth for South Cambs and Cambridge City

On 1st July 2021, DEFRA announced that chalk streams would be given enhanced environmental protection, and published the Environment Agency document titled "Water stressed areas – final classification 2021" which included the fact that the supply areas of Cambridge Water and Anglian Water are areas of serious water stress, page 6. According to Appendix 3, Cambridge Water needs to reduce abstraction by 22 megalitres per day from levels current as at 1st July 2021, and Anglian Water needs to reduce abstraction by 189 megalitres per day from levels current at 1st July 2021.

Water Resources East is the body responsible to produce a plan for the provision of water to enable proposed growth in the Greater Cambridge area. At present there are no plans or costings or infrastructure in place. Until there is the provision of a sustainable water supply the proposed growth in the current and future local plan development may be unsustainable.

#### 2. Sewage

Anglian Water (AW) currently have capacity at the Milton Waste Water Treatment Works (WWTWs) for the provision of sewage until 2050. AW have proposals to relocate the WWWTs to Honey Hill on Cambridge Green Belt land. Anglian Water granted £227m HIF by the government to fund the move however it is unclear if the grant will fully fund the project or

when if approved confirmation when the new works will be operational. AW are dependent that a DCO will be issued by the Planning Inspectorate.

Although there will be a need for a pumping station and pipelines the level of detail in the "Waterbeach Zone in AW's recent scoping report which mentions haul roads, construction plans and other material planning considerations has not yet been disclosed or taken to public consultation. The Waterbeach Zone will have a significant impact on the people of Waterbeach parish, landscape, environment, Green Belt and biodiversity and should be given due weight and consideration in the draft local plan.

The Waterbeach Zone is a huge proposition the outcome of which will be arrived at by the provider AW and developers of Waterbeach New Town and a reliance that will be brought forward in a timely manner as stated in the SPD:

Page 130-131 "Provision will be dealt with through direct agreement with service providers as development is implemented. This will be outside the scope of any planning control or S106 agreement. Service providers are obligated to meet any demand arising from the development (11,000 dwellings, associated buildings, schools, businesses, hotels) with the site promoter providing the cost."

It is unclear if part or whole of the required infrastructure for the Waterbeach Zone will be funded by the developers of WNT or by the £227m HIF government granted to AW for the relocation of the Milton WWTWs

It should be noted that there are already issues of contamination from sewage when there is heavy rainfall and already the need for many daily tanker movements from the Waterbeach WWTP. WNT build out must be limited until a new Waterbeach pumping station is commissioned and operational.

<u>Planning Process – Cambridge Waste Water Treatment Plant Relocation Project (cwwtpr.com)</u>

#### 3. Electricity

WPC are aware that currently the provision of electricity is a barrier to growth. The Greater Cambridge Partnership (GCP) has undertaken to fund electricity grid reinforcements. Will that provision be in place and funds available ensure delivery to enable the proposed accelerated growth of WNT?

<u>GCP takes ground-breaking approach to secure future of electricity network - Greater</u> Cambridge Partnership

#### 4. Transport Infrastructure

Transport plans submitted by Urban & Civic and RLWE were described as "substantially underfunded" by Sharon Brown SCDC Director of Delivery at the Extraordinary Planning Meeting for Waterbeach New Town East held on 29<sup>th</sup> January 2021 as evidenced in the broadcast here: Agenda for Planning Committee on Friday, 29 January 2021, 11.00 a.m. (moderngov.co.uk)

The proposals for the required sustainable transport infrastructure for WNT are currently of a piecemeal nature. The responsibility for delivery, cost and funding is currently unknown. The Greater Cambridge Partnership (GCP) is the responsible body for the delivery of the Waterbeach segregated busway and greenway. The Combined Authority (CA) is the responsible body for the dualling of the A10 or upgrade of junctions. Developers and SCDC through S106 developer contributions and planning obligations are responsible for cycleways and park and ride sites. Developers RLWE have been granted planning permission to relocate the existing Waterbeach station to the North of the village after they promised to fund the provision of the station. It is currently unclear if funding is available for the relocation of the station by RLWE. It is also unclear when the relocated station will be operational. The delivery of WNT was claimed to be dependent on the developer funded relocated railway station as a sustainable mode of travel.

## 5. The delivery of infrastructure controlled by triggers as per the number of dwellings coming forward

A faster build out rate will require a faster provision of the required infrastructure as detailed in the granted planning permissions, Policy SS/6 in the adopted 2018 Local Plan and the adopted Waterbeach SPD

#### 6. Neighbourhood Plan

WPC wish to bring to GC planning's attention that the Waterbeach Neighbourhood Plan is at an advanced stage of completion. The plan has been through examination by the Inspector and passed inspection. WPC are working with SCDC to finalise the plan which will then go to referendum. If parishioners vote in favour the plan will be "made sound." The plan has stand alone SEA, Heritage and Character Assessment and Design Principles documents which can be considered as material planning considerations that support the plan. WPC request that the Neighbourhood plan and supporting documents are a consideration as development comes forward in the parish.

#### 7. Cambridge Green Belt and green spaces

The Cambridge Green Belt wraps around the parish to the South, West and East. WPC request that the Green Belt land remains protected from windfall/rural exception site development to enable a green transition from the Eastern edge of the village towards the River Cam and access to the fenland countryside and public rights of way.

WPC note the proposals for greenspace and river corridors from the City to Wicken Fen, Anglesey Abbey and beyond. WPC note the proposed high density proposed for the Cambridge North Eastern Fringe development and question if this is to compensate for the lack of open green space per capita on the development site.

WPC seek reassurance that the proposed draft plan will not increase the density of WNT and other settlements currently in the adopted 2018 SCDC local plan by using the Cambridge Green Belt, fenland, farmland, river Cam corridor and waterways as open green space to compensate for the lack of green space within high density settlements.

WPC enquire how net gain offsetting will be proven and enforced due to the proposed accelerated growth of WNT?

#### 8. Climate change and flooding

WPC feel it is Important that future risk of flooding is not increase due to accelerated growth from WNT through fluvial or surface water flooding as shown on the Environment Agency maps Fluvial risk enlarge map to include WNT:

https://flood-map-for-planning.service.gov.uk/confirm-

location?easting=550093&northing=265821&placeOrPostcode=CB25%209JT

Surface water risk enlarge map to include WNT: <a href="https://www.cambridge.gov.uk/media/2568/strategic-flood-risk-assessment-appendix-b-part-4.pdf">https://www.cambridge.gov.uk/media/2568/strategic-flood-risk-assessment-appendix-b-part-4.pdf</a>

Climate Change -Central predicted risk of flooding due to sea level rise caused by climate change could occur as soon as 2030. How will this be a consideration and mitigated to compensate for an accelerated build out rate of WNT?

https://coastal.climatecentral.org/map/12/0.2105/52.2889/?theme=sea\_level\_rise&map\_typ\_e=year&basemap=roadmap&contiguous=true&elevation\_model=best\_available&forecast\_yea\_r=2030&pathway=ssp3rcp70&percentile=p50&refresh=true&return\_level=return\_level\_1&rl\_model=gtsr&slr\_model=ipcc\_2021\_med\_

WPC seek to know if the proposed accelerated growth will affect GC zero carbon targets and how will it affect the GC aspirations in the draft local plan?

In summary:

The proposed acceleration of WNT is dependent on the required essential services including health and education, transport infrastructure delivered in a strategic, timely and fully funded manner.

It is important that there is a joined up strategic transport plan to provide sustainable, affordable, accessible and a reliable transport system to replace the fragmented system presently in existence.

It is important that the Waterbeach Neighbourhood Plan and supporting documents included and given due weight and consideration within the draft local plan.

The Cambridge Green Belt abuts Waterbeach parish, green open space and river Cam corridor. It is extremely important that areas designated as SSSI's, RAMSAR, SAC and other recognised protected areas should be enhanced and not a means to compensate for the lack of green space in high density settlements such as the Cambridge North Eastern Fringe development. It is also important to protect the abundant biodiversity and habitat in the parish. WPC request that this matter is treated as a priority if development is accelerated in WNT and the GC area.

How will GC planning ensure net gain offsetting targets in the draft local plan are met due to the accelerated growth of WNT? How will it be monitored and manage to obtain "net gain"

The settlement of WNT and Waterbeach village on the Environment Agency flood maps show them to be vulnerable and prone to flooding from fluvial, surface water and sea level rise. How will residents and important farmland be protected due to the proposed accelerated growth of WNT in the draft GC plan?

Kind Regards,

Belinda Westwood Interim Parish Clerk & RFO Waterbeach Parish Council

SIGNED: