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Waterbeach New Town East

Greater Cambridge Draft Local Plan Reg 19 Consultation

Prepared on behalf of Waterbeach Development Company | September 26

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1. INTRODUCTION

1.1 Waterbeach Development Company (WDC) has been involved in the promotion of development at Waterbeach new town for a considerable period and has secured outline planning permission at Waterbeach new town East (under ref: S/2075/18/OL).

1.2 They also achieved full planning permission for the relocated railway station (under ref: S/0791/18/FL) which is being delivered by the Greater Cambridge Partnership.

1.3 In this context WDC has reviewed the Greater Cambridge Local Plan Regulation 19 Proposed Submission consultation document and wishes to make a number of representations, primarily related to the site-specific policy for Waterbeach New Town under the Site Allocations section of the draft Local Plan.

1.4 Whilst it was previously noted and welcomed that the planning status of the strategic new town development at Waterbeach had been clearly reflected within Proposed Policy S/WNT and its supporting text, at the previous Draft Local Plan (Regulation 18) consultation stage, it is evident that this is no longer the case in this instance.

1.5 Although Policy S/WNT in the Regulation 19 draft helpfully recognises the overall dwelling capacity of 11,000 consistent with that established through the grant of the respective outline planning permissions, and alludes to the existing consents (for example in commenting that the policy supports to continued development of Waterbeach New Town and that the town has started to deliver new homes and associated facilities and infrastructure, within paras. 3.3.80 and 3.3.81 respectively) it fails to make clear and explicit reference to the planning permissions already in place. This had been the case at Regulation 18, helping to underline the respective overarching consents as helpful context.

1.6 Furthermore, it is considered that, whilst the draft policy and supporting text reflect some key elements established through the respective planning permissions, including the associated approved parameter plans which now form the principal framework for implementation of the development, there are a number of deviations from that framework of planning permissions. WDC wishes to highlight and hereby object to these deviations on the basis that these result in draft Policy S/WNT being undeliverable and therefore not effective, rendering the policy unsound as currently drafted.

2. GYPSY AND TRAVELLER PITCHES

2.1 The requirement for 24 permanent Gypsy and Traveller pitches across two equally sized sites is set out at S/WNT 8.a.ii. This was not previously identified as a requirement in the Adopted South Cambridgeshire Local Plan (2018) Policy SS/6 or the Waterbeach New Town SPD (2019) and therefore has not consequently been included within either of the outline planning permissions, either spatially, in terms of the descriptions of development and land uses or the respective legal agreements. As such it is not realistic that these could be delivered under the existing planning permissions and therefore inappropriate for inclusion in the policy at this stage.

2.2 In this regard it is noted and welcomed that, since the Regulation 18 Draft Local Plan consultation stage this aspect has been refined through the addition of the following qualification on the location of such provision: “located within but on the edge of the development, or outside but in close proximity to the site…” The comments above with regards to siting within the new town still apply, but the additional flexibility to locate provision outside of the new town site at least provides a degree of scope for this to be achieved.

2.3 Retention of reference to siting of this requirement within the allocated new town site continues to render this aspect of the policy unsound as it would not be effective, although on balance WDC accepts that inclusion of scope for location outside the new town does provide some prospect of delivery, albeit unclear where such provision could be practically located in this regard.

3. DEVELOPMENT EAST OF BANNOLD DROVE

3.1 S/WNT 11 sets out the following: “Avoid vulnerable development on land to the east of the Bannold Drove, which could be at risk of flooding if a breach of the existing flood defences on the River Cam were to occur.” This is considered inaccurate and therefore misleading, whilst failing to recognise the relevance of the provisions within the outline planning permission for Waterbeach new town east and should therefore be deleted from the policy.

3.2 Supporting text at 3.3.99 in the Regulation 18 Draft Local Plan was considered to have represented a more accurate explanation of the situation, particularly in the final sentence which stated, in relation to appropriate mitigation, that “These measures were identified and agreed with the Environment Agency through the detailed Flood Risk Assessment that accompanied the planning application for the eastern part of the town,” as noted in WDC’s previous representations.

3.3 As such it is evident that this matter has been suitably explored in the outline planning application, with the associated permission setting the framework for reserved matters applications in terms of any further flood risk assessment and surface water drainage related considerations through its conditions.

3.4 Removal of that acknowledgement from the policy and supporting text (at para 3.3.89) in the Regulation 19 draft are considered unhelpful. In that context it is misleading to state at S/WNT 11 that vulnerable development to the East of Bannold Drove should be avoided and this needs to be corrected accordingly, as this contradicts the planning permission that has been granted.

3.5 On this basis it is considered that this aspect of Policy S/WNT 11 is unsound, being neither justified nor effective.

4. SPATIAL FRAMEWORK DIAGRAM

4.1 It is noted above that reference was previously made, specifically at S/WNT 8 of the Regulation 18 Draft Local Plan, to the Spatial Framework Diagram (SFD) presenting a layout which accorded with the Waterbeach New Town SPD and reflected the parameter plans approved under the respective outline planning permissions. As noted in the introduction to these representations, those references appear to have been removed from the Regulation 19 Draft. Notwithstanding the previous assertions, there were a number of deviations which WDC highlighted within its previous representations (some of which have been positive addressed) although it is considered that a number of conflicts still remain in this regard which would have implications for the soundness of Policy S/WNT.

4.2 S/WNT 12 states that built form of the new town is to be in accordance with the "indicative" Spatial Framework Diagram, with para 3.3.81 using the same terminology. It is considered that this presents a confusing approach with regard to the status of the SFD in terms of whether it is simply an indication of a potential approach (as the word "indicative" would imply) or is to be accorded with as the policy suggests.

4.3 Para. 3.3.81 also clarifies that the Waterbeach new town SPD will continue to be a material planning consideration in the determination of future planning applications. Yet there are a number of discrepancies between the SFD, the SPD and the Parameters defined within the respective Outline planning permissions for Waterbeach new town west and east, which arguably render the SFD unsound, on the basis of not being effective, or at the very least may give rise to confusion as to how this is to be applied or achieved in practical terms.

4.4 Notable deviations, which it is considered should be corrected to accord with the parameters plans that now form the principal framework against which future reserved matters applications are to be assessed and determined, are as follows:

- The local centres shown on the SFD and referenced in Policy S/WNT do not appear to tally with one another. The SFD shows five local centres, including the Station District Centre (plus the Town Centre), whilst S/WNT 8 c references the Town Cente, Station District Centre and two other local centres (in fact it says "at two other key areas of activity" which is assumed to be an error;
- The location of the southernmost of the Local Centres within WNTW appears to have been moved further east than shown on the approved U&C Parameters Plan;
- There is even greater discrepancy with regard to the broad siting of the required education provision. Only three school locations have been shown for WNTW whereas the approved parameters plan and details of the outline permission indicate five facilities, across three primary schools, one secondary school and a SEND school. Of these only the north-western primary school and secondary school locations appear to correspond with those shown on the parameters plan. Those for WNTE are broadly correct in number and location, except for the northernmost school shown school location, which albeit indicative, has been moved some distance to the north-west in comparison with that approved on the parameter plans;

4.5 It is considered that these aspects should be corrected as currently these would not be deliverable in view of the identified variance from the approved parameters plans for WNTW and WNTE respectively.

4.6 Furthermore, whilst it is welcomed that key elements of the movement network have been added to the SFD, and that this illustrates the cross-boundary connections that are to be made, it is unclear why this network has not been continued within the WNTE site. An important aspect of the movement strategy is to ensure connectivity from all parts of the newt town to the relocated railway station and therefore this should be clearly portrayed within the SFD.

4.7 As mentioned above, it is welcomed that some positive revisions have been applied to the SFD, most notably inclusion of the area of proposed wetland creation to the north-east of the northern development boundary, which WDC's previous representations had highlighted as missing from the SFD.

4.8 It is noted that this has been included within the proposed Strategic Enhancement Area (SEA) for Waterbeach new town. The approach to the SEAs appears to have been amended from the Regulation 18 plan in recognition that differing aspirations would apply to the SEAs for each strategic allocation site that they have been identified for. It is considered to represent a positive step that, rather than defining an overarching policy basis for SEAs akin to that of a Green Belt function each area has been considered separately.

4.9 In this instance it is agreed that the primary role of the SEA for Waterbeach will be to safeguard the setting of Denny Abbey, whilst recognising the multifunctional functions that areas of this designation may also play in parallel.

4.10 This area has been appropriately addressed in the respective new town permissions with regard to respecting the setting of Denny Abbey. The additional area incorporated to the north-east will provide recreational open space and habitat creation, as referenced at S/WNT 6, but will also fulfil a drainage function which could also helpfully be referred to in this context.

5. CONCLUSIONS

5.1 It is requested that these representations be taken into account in the refinement of Policy S/WNT. It is apparent that revisions will be required to ensure consistency between the policy and the approved outline planning permissions, and in turn soundness of the Local Plan as it moves forward.

5.2 WDC would intend to participate in any forthcoming Local Plan Examination in the event that further revisions are not made to address the comments and objections outlined above ahead of the plan's submission.

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