

**Matter SC6A- Policy SS/5 Waterbeach**

**Ref Dr C Grant (22459)**

**Representations 62691 65257 65253**

**Local Plan Examinations  
Cambridge City  
and  
South Cambridgeshire**

**Statement to the Inspectors**

**on**

**Matter SC6A - Policy SS/5 Waterbeach New Town**

**From Dr C R Grant, Waterbeach resident**

**February 2017**

**Representations 62691 65257 65253 from Dr C R Grant including detailed response letter submitted as part of the representation on Matter SC6A - Policy SS/5 Waterbeach New Town South Cambridgeshire Local Plan, Chapter 3, Strategic Sites, Policy SS/5 Issues**

## Local Plan Examinations Cambridge City and South Cambridgeshire

**Representations 62691 65257 65253 from Dr C R Grant including detailed response letter submitted as part of the representation and how they map to the MatterSC6A issues identified in the Matters and Issues document.**

**Matter SC6A - Policy SS/5 Waterbeach New Town South Cambridgeshire Local Plan, Chapter 3, Strategic Sites, Policy SS/5 Issues:**

### 1. General Policy

- i. Does the figure of 9,000 dwellings in paragraph 1 represent the maximum number of houses that would be developed on the site in accordance with this policy?

The Local Plan identified the need for a potential additional 1400 houses by 2031 (and even these may be unnecessary if there is infill etc. in existing villages) in addition to other identified sites not many thousands necessitating another new town. There is no clear need for a major new town development at Waterbeach. Some 900 to 1500 houses could be accommodated on the currently built on areas of the airfield and thus a new town in this location is not justified. Moreover in Waterbeach alone additional planning permission for more than 319 houses has been approved off Bannold Road and Denny End Road since the draft local plan was announced in addition to 235 bedrooms in 27 residential dwellings converted from 2 existing barracks blocks. The constraints of the ancient monument (Denny Abbey), the railway, the A10 and the northern fringe of Waterbeach village do not allow for an appropriately landscaped settlement clearly separated from existing houses by open space

A 9000 dwelling development should not be included in the current plan to 2031 as the infrastructure improvements to support such an increase are not in place and feasibility plans, costings and potential timescales have not been established. In the long term 2031 onwards if infrastructure is in place it could be considered but additional utility infrastructure such as water gas, energy, telecoms etc would also need to be significantly enhanced as well as transport, drainage, education and health services. The proposed planning application to be submitted (probably in February) by Urban and Civic completely changes the scheduling of development and yet detailed infrastructure developments needed before housing development occurs have not been identified in the local plan or in any modifications proposed by SCDC. This is unacceptable and makes the current Local Plan with modifications inappropriate as it ignores the actual position at February 2017.

Initial development phase prior to 2031: The local plan does not tie this to the large brownfield area of hangars, parade ground, and ancillary administration and residential blocks. The first, and preferably only immediate phase of development should be concentrated on the area which has already had airfield/army buildings and should not be in undeveloped areas of the site apart from providing access from the A10.

- ii. Would the proposed level of employment on the site be consistent with the proposed number of dwellings?
- iii. Given the direct rail link and the new station, does the new town have the potential to become an attractive location for people who work beyond the Cambridge Sub Region e.g. in London? If so, could this factor cause local people to be priced out of the housing market in this location?

The local plan emphasised the need for more homes to satisfy local housing supply. If the station is moved to make the new development more attractive to developers then the development will become an attractive London commuter location. Already the growth of housing near other stations

on the Ely to Kings Lynn line is making the cost of housing in these areas rise and become more than local people can afford and a major development at Waterbeach with easy access to a mainline station would exacerbate this. Trains on the Kings Lynn to London line are already at capacity with standing room only at many times. Relocating the station will probably decrease the amount of local housing provided as many residents would move to commute to London from the new development.

- iv. **Would the proposed new town result in an unacceptable loss of good quality agricultural land?**  
The proposed strategic site includes using prime agricultural land in the development of the new town. Such a loss is against stated planning principles and leads to considerable issues regarding drainage and runoff if there is significant development. Moreover some of the necessary infrastructure is being planned outside the strategic site area on additional good quality agricultural land.
- v. **The policy and reasoned justification makes reference to the significant amount of new infrastructure which will be required as a consequence of the development. Bearing in mind the requirements of paragraph 177 of the National Planning Policy Framework, is there a reasonable prospect that the provision of such infrastructure, and the services and facilities referred to in the policy and justification, could be achieved in a timely fashion, particularly if the proposed modification to remove any phasing of development (PM/SC/3/H) is accepted, whilst not putting at risk the overall viability of the development?**

The delivery of the infrastructure before any development is allowed would be essential but SCDC have a poor record, particularly in Waterbeach, of ensuring that developers do fulfil their original promises. It is not appropriate to change the phasing of the development at Waterbeach (flexibility proposed in modification to Local Plan) when no specific supporting infrastructure requirements were attached to the flexibility proposal.

Specific Infrastructure requirements should include:

- a) Road infrastructure: The A10 is already over capacity and does not have the ability to cope with the proposed increase in traffic generated by a new town. Even if the road is dualled from Waterbeach to Milton this does not provide sufficient infrastructure as routes from the A10 at Milton roundabout are frequently congested and with the significant building proposed north of Ely this will only get worse. Not to propose any improvements north of Waterbeach to link with the A142 and A10 north is short sighted and shows the lack of a true transport strategy for the A10 corridor (apparently in development but not yet available). During any road improvements on the A10 there will be significant rat-running through the existing village where Cambridge Road, High Street and Station Road are already congested and not suitable for such additional traffic (as is frequently demonstrated when the A14 is blocked and traffic diverted, needing traffic police on the level crossing and often resulting in “deadly embrace” situations at pinch points such as Station Road corner). The effect on the already loaded A10 of the additional developments to the North of Waterbeach in Ely and Fenland District Council will also exacerbate the issues of traffic congestion on the A10.
- b) Station proposed relocation: A proposal to move the station benefits no-one except the developers who believe it will make their proposal more attractive and give them the ability to charge a premium for the houses. In fact making the station easy to access from the proposed new town is much more likely to make it a London overspill town inhabited by a significant proportion of commuters rather than supplying the local housing supposedly required in the Local Plan. Moreover all the existing residents will be

disadvantaged by such a move as well as the many commuters and occasional rail users who already get dropped off at the station or use the car park.

- c) Adequate surface and foul drainage infrastructure to ensure there is no impact on land currently drained by the Waterbeach IDB or “highland” land drained through the Penstock off Clayhithe Road. While it is acknowledged there is opportunity for the proposed strategic site development to drain into the river below Bottisham lock anything that increases the threat of flooding off Clayhithe Road/Whitmore Way, Lodeside must be avoided as there is a history of flooding of the “highland” area which can take several weeks to subside. Moreover the recent development of permissions for some 320 houses in Waterbeach while not themselves needing significant infrastructure improvements are loading the existing infrastructure which has already been considered “at the limit”.
- d) Adequate infrastructure for education, medical services etc must be provided not to overload the existing facilities at any stage of the ongoing development.

Conclusion: Any change to original phasing ie some 1400 houses in the planned period must be contingent on infrastructure improvements being in place before the development is begun, and certainly before any housing is completed and ready for occupation. Without such a proviso there is a significant chance that the quality of life for many existing residents will be radically impacted, particularly given the significant approved developments off Bannold Road and Denny End Road.

vi. **Should the policy clarify how the proposed new town would relate to the setting of the River Cam adjacent to the site?**

Visual and environmental impact: The size of the proposed new town will be overbearing on the existing village and there is no clear separation with green space and agricultural land to retain the rural nature of Waterbeach, particularly the northern edge of the village. Bannold Road is the route to Bottisham lock, the River Cam and the footpaths along the river. Bannold Drove leads to the green road which forms one of the few circular walks in the village with the ability to go down the green road, over to Long Drove and back. To absorb such an important byway into the proposed new town development and obliterate it with the new station approach would destroy a well used leisure facility for current residents. This walk offers views across fields and open space and will be entirely lost. The site itself is important for wild life with established communities of protected species such as great crested newts and badgers, and birds such as orioles, barn owls, herons, and kingfishers. When the business park was developed habitat for the orioles was supposed to be retained but is no longer evident. The separation of the “married quarters” from the village was supposed to be retained in the form of fields between Bannold Road and the housing off Cody Road. The original plans for Cam Locks provided significant green space, but this was all lost when the developers asked for larger houses over the whole site not just the previously built on brownfield site and land between Cam Locks and Bannold Drove is now being developed. Thus part of the access to the river from the site has been radically changed and if the station is moved the site will be further separated from open countryside.

vii. **Does the area of land identified on Inset H of the Policies Map provide sufficient capacity to achieve the quantum of development associated with the new town whilst ensuring that the setting and historic significance of Denny Abbey is preserved or enhanced? Should the policy include a requirement for a setting study to be submitted at the planning application stage in respect of the relationship of the development to the designated heritage assets within the site?**

Any new town development needs a significant area of open space between it and existing habitation, while Denny Abbey and Chittering to the north are afforded some protection in the

proposals Waterbeach itself gets NONE and it is important that some of the parkland, open public space etc is sited to the South of the site.

- viii. Would any of the existing facilities within the site be retained e.g. sports facilities?
- ix. Would the provision of town centre uses be detrimental to the existing convenience retail offer in Waterbeach village?
- x. Would other land not identified on Inset H of the Policies Map be required to facilitate storm and foul drainage arrangements?  
The use of additional Greenfield land outside the framework was not part of the options exercise and is not part of the local plan consultation but is essential for the development of the land (and the developers have advanced plans for including additional land
- xi. Should the policy specifically require a surface water and foul water drainage water strategy?  
Yes, see response to v above

## 2 Future Area Action Plan Development Plan Document (AAP)

- Does the preparation and subsequent adoption of an AAP represent an appropriate mechanism in planning terms for the implementation of this development? If this is not a sound approach, would the Council's further proposed modification to prepare SPD rectify that issue?  
No, because the council is being forced to consider planning applications before the local plan is in place and this is all adding to an unacceptable growth of population without infrastructure improvements.
- Paragraph 6n: Should reference also be made to measures to mitigate the effect of the development on the wider landscape area including Landbeach and Milton settlements?
- Paragraph 6p: Would the assessment of heritage assets also include World War II structures on the site which may be worthy of retention?  
Ideally
- Paragraph 6w: Is there a reasonable prospect that the effect of the development on the ecology and biodiversity of the site could be adequately mitigated?  
The links between the strategic site and green areas around the existing village have been compromised by recent planning permissions and would be further compromised by a major station development with car parks etc so a strategy to provide green corridors must be developed.
- Paragraph 6x: Would the relocation of the railway station be detrimental to the residents of Waterbeach village in terms of the increased travel distances to a sustainable mode of transport?  
Many residents who moved to Waterbeach to have access to the station would be affected by any move of the railway station. The current bus services would not be able to provide these residents with a suitable alternative public transport and there would also be an impact on people coming from Horningsea direction (many from Bottisham, and other areas east of Fen Ditton use Waterbeach station) who would increase traffic through Waterbeach village to access a relocated station.
- Paragraph 6hh: Should there be a cross reference to Policy TI/8: Infrastructure and New Developments as the policy indicates that planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make a scheme acceptable in planning terms?  
Definitely since there is a clear need for infrastructure improvements (particularly to the A10 corridor) to be implemented before any significant development is allowed. Already Planning applications off Bannold Road involve over 290 houses and with 30 off Denny End Road and some 235 bedrooms from conversion of barracks blocks to nurses and doctors accommodation; this

equates to more than 25% of the originally proposed 1400 houses within the plan period and there is about to be an application for 6500 houses on an area of the strategic site.

- Paragraph 6ii: Would the flood risk reduction measures be sufficiently resilient to the effect of climate change over the lifetime of the new town given that it is low lying land? Would this form part of the flood risk assessment for the site?

Any such schemes must also consider the impact on the current highland land between Horningsea and Waterbeach which provides floodplain for the River Cam above Bottisham lock. Developments in Cambridge have reduced the floodplain between Cambridge and Horningsea and the IDB must have capacity to drain the highland land within a short period as otherwise residents of Whitmore Way with a flood wall and pumping system would be very adversely affected.

- Paragraph 6jj: Should reference also be made to the creation of appropriate community governance arrangements to assist the development of the new community?

This must depend on the size of the development, probable not necessary for the original 1400 residences proposed but definitely necessary if an application for 6500 houses (or more) on the strategic site is pursued.

- Paragraph 6kk and 6ll: Given the previous use of the site for military purposes, is there a reasonable prospect that the de-contamination of the site could be achieved satisfactorily so as to enable residential occupation whilst not prejudicing the viability of the proposed development?
- 3 Council's Further proposed modifications November 2016
- i. Are these modifications necessary to ensure the soundness of the Plan?