



South Cambridgeshire Local Plan Examination: Matter SC6A  
Hearing Statement (SS/5 Waterbeach New Town)

 RLW Estates / DIO (18277) Representation Numbers: 60384,  
60385, 60372-60375, 27651 (CC rep)

**Boyer**

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## **INTRODUCTION**

- 1 This statement relates to Matter SC6A concerning Waterbeach New Town. It is submitted on behalf of RLW Estates (RLW) in connection with their land interests. It follows submission stage representations made on behalf of RLW and the DIO.
- 2 Reference is made to appendices and examination library documents that strengthen the evidence base for the allocation.

## 1. GENERAL POLICY

### **Question 1.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?**

- 1.1 Site capacity will be determined by residential density, land required for other land uses, land needed to protect the setting of Denny Abbey and the scope to locate drainage infrastructure and ecological mitigation on land outside the major development site boundary.
- 1.2 Previous representations have consistently maintained that capacity should be regarded as being higher than the 8-9,000 range, and in the order of 10,000 dwellings.
- 1.3 We maintain this view and suggest the policy refers to “approximately 10,000 dwellings”. This is supported by a ‘*Site Wide Capacity Study*’ (Appendix 1), which indicates that capacity could be slightly higher (up to 11,000 dwellings) but within the span of “approximately 10,000” (based on a 10% variation).
- 1.4 This matter will be addressed in greater detail through the SPD.

### **Question 1.ii Would the proposed level of employment on the site be consistent with the proposed number of dwellings?**

- 1.5 Yes, although that is not to imply that the number of jobs is to be matched to economically active residents.
- 1.6 A report by GVA Grimley on behalf of DIO and RLW (October 2013), submitted with our representations, confirmed that Waterbeach new town should not be required to contribute towards wider sub-regional employment needs in the Plan period or beyond, given the current substantial over-provision. It concluded that delivery of 8,500 jobs would be appropriate in conjunction with 9,000 dwellings, based on previous guidance in the Eco-towns supplement to PPS1.
- 1.7 This level of supply will be sufficient to meet the town’s own needs, especially given the access to existing employment provision adjoining the site at Cambridge Research Park.
- 1.8 As a result of the refinement of assumptions (as an input to the A10 Corridor Study), a figure of approximately 8,600 new jobs in association with 10,000 dwellings was proposed. (see Appendix 5).
- 1.9 Our strategy is not to plan for large-scale employment parks, but to provide a much finer-grained and flexible mix of employment hubs, workshops and offices, mixed in with housing and other uses, but with concentrations in the town centre and close to the relocated rail station.
- 1.10 The principle to this approach is illustrated on 3D diagrams included at Section 6 of the Capacity Study (Appendix 1).

- 1.11 Such an approach would enable any increase in employment (reflecting a higher capacity) to be seamlessly incorporated within the residential fabric of the development.

**Question 1.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?**

- 1.12 The presence of the railway line must be seen as a major benefit in respect of the sustainability of the location and in reducing reliance on use of the private car.
- 1.13 2011 Census data (ONS) indicates that the vast majority of current Waterbeach residents work locally. Commuting by train to London accounts for 2.3% of all commuting trips. This level of commuting to London by train compares to 3.8% for Cambridge City and 2.9% for South Cambridgeshire District.
- 1.14 The annual number of rail passengers from Waterbeach to Cambridge (to March 2015) was approximately 165,000. Waterbeach provides the 3rd highest number of rail passengers to Cambridge (after Ely [1st] and King's Lynn [2nd]) from stations north of Letchworth (GTR November 2016). The majority of rail passengers travelling south from Waterbeach go to Cambridge rather than to London (GTR consultation on 2018 timetable (see Appendix 6).
- 1.15 The new settlement is more likely to increase rail journeys to Cambridge than to London and could reduce long distance commuting.
- 1.16 In respect of affordability, the significantly increased supply of housing represented by the development, alongside scope for delivery of a mix of tenures including affordable housing, will have beneficial impacts overall, including affordability.

**Question 1.iv Would the proposed new town result in an unacceptable loss of good quality agricultural land?**

- 1.17 An Agricultural Land Classification (ALC) Survey undertaken across the Site confirms that the land is classified as a mixture of land uses, including urban, woodland/scrub and agricultural land. The majority of the site consists of Grades 3a and 3b (approximately 250ha) land with only a small proportion of Grade 2 (approximately 33ha). The remainder (approximately 280ha) is not 'best and most versatile' land.
- 1.18 As shown within the plan at Appendix 7, the site consists of a lower quality agricultural land than its immediate surroundings, which is dominated by Grade 1 and 2 agricultural land.
- 1.19 Given that there is no strategic shortage of the best and most versatile agricultural land in South Cambridgeshire and in this region, the loss arising from development of the site is not significant.
- 1.20 Further, the overall sustainability and benefits of the new town, as detailed in this statement are considered to outweigh the loss of agricultural land.

**Question 1.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?**

- 1.21 The Plan's evidence base identifies the infrastructure likely to be required for the development, provides high level estimates of the costs (by category) of that infrastructure and analyses how this is to be funded by a combination of public and developer sources. This evidence base (together with information provided by the two promoters) establishes a more than reasonable prospect that the required infrastructure will be delivered in a timely fashion without putting the overall viability of the development at risk.
- 1.22 The updated Cambridge City Council and South Cambridgeshire District Council Infrastructure Delivery Study 2015 (IDS) (RD/T/020) details the infrastructure required.
- 1.23 The IDS chapter for Waterbeach New Town estimates site specific infrastructure costs at approximately £150 million. This covers community facilities, education, health, leisure (play space and sports facilities), libraries and waste. This equates to approximately £17,000 per dwelling.
- 1.24 In terms of transport and accessibility the IDS:
- specifies overall Ely to Cambridge transport corridor infrastructure requirements and costs including specific measures and costs for the Waterbeach development
  - states that the A10 corridor study (A10 CS) is to refine these requirements and costs;
  - indicates that the A10 CS will set out comprehensive measures including highway improvements, guided bus, park and ride, improved rail services and infrastructure, as well walking, cycling and travel management initiatives;
- 1.25 The A10 CS will also help determine the balance between public transport measures and highway improvements, consistent with the focus of the transport strategy on securing modal shift.
- 1.26 Overall, the IDS estimates that Waterbeach new town will contribute between £216.5m to £256.5m in S106 developer contributions (depending on the scale of affordable housing) and of this, £50m to £90m could be available for strategic transport infrastructure (para 13.7.18 PBA study).
- 1.27 The Transport Strategy for Cambridge and South Cambridgeshire (Section 5) emphasizes sustainable transport initiatives. A "new station at Waterbeach to serve the village and the new town" forms a major part of the interventions to achieve these objectives.

- 1.28 RLW is proposing to relocate the existing station at Waterbeach and anticipates the submission of an application in 2017. Appendix 8 summarises the purpose of the relocated station, including station costs and revenue, specific benefits and timescale for delivery. The full Feasibility Report for the new Waterbeach Station (GRIP 2) is also attached as Appendix 9.

*Overall Approach to Sustainable Transport Infrastructure*

- 1.29 A report by WSP entitled "Waterbeach New Settlement – Transport Characteristics (see Appendix 2) sets out specific rail, bus, cycle, and highway proposals (including junction capacities, in particular the A10/A14 junction), with thresholds for provision based on numbers of dwellings completed.
- 1.30 Although final solutions will be informed by the output from the A10 Corridor Study, detailed consideration has been given to the specification, phasing and costs of appropriate sustainable transport infrastructure.

*Waste Water Treatment*

- 1.31 Waterbeach village is currently served by a small capacity Water Recycling Centre owned and operated by Anglian Water Services (AWS) which discharges into the River Cam via the IDB drainage system. This provides capacity for approximately 750/800 additional dwellings. Further capacity is therefore needed.
- 1.32 The preferred solution is to build a new Water Recycling Centre in the area north-east of Waterbeach village. No constraint upon or interruption to the delivery of housing is anticipated.

*The Role of the Supplementary Planning Document (SPD)*

- 1.33 A key role of the proposed SPD will be to provide further information on required infrastructure, phasing and thresholds for provision, costs, funding and delivery.

**Question 1.vi Should the policy clarify how the proposed new town would relate to the setting of the River Cam adjacent to the site?**

- 1.34 There is no "in principle" concern about the impact of the development on the River Cam. The nature of any impact, and possible mitigation, will be considered through the SPD and planning application processes. There is therefore no need for the policy itself to address this.

**Question 1.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?**

- 1.35 The northern extent of land within the area of the 'Major Development Site' on Inset Plan H of the Submission Plan does not fully reflect the findings of analysis by LDA Design in its reports titled 'Landscape and Heritage Appraisal of Denny Abbey and its Setting' (October 2013) (submitted with our representations) and 'Denny Abbey and its Setting: Analysis and Recommendations for the Waterbeach New Town' (November 2014) (see Appendix 11).
- 1.36 The latter report includes a plan demarcating the northern limit of built development (which is the line preferred by Historic England) and recommendations for areas of landscape south and east of Denny Abbey to conserve and enhance its setting, principally comprising land controlled by RLW.
- 1.37 Both documents were developed in consultation with representatives from Historic England, English Heritage, SCDC and the Farmland Museum.
- 1.38 The two documents will continue to inform the planning and design of the proposed development and will be submitted at the application stage as part of the supporting documentation.

**Question 1.viii Would any of the existing facilities within the site be retained e.g. sports facilities?**

- 1.39 We understand that some re-use is anticipated.

**Question 1.ix Would the provision of town centre uses be detrimental to the existing convenience retail offer in Waterbeach village?**

- 1.40 The Cambridge Sub Regional Retail Study (2008) identified Waterbeach as a small local centre that provides a good variety of local shops and services.
- 1.41 The principal town centre will be supplemented by a number of local centres. The existing Waterbeach village will play a key role as one of these local centres. It will continue to serve a different catchment and provide an alternative offer and will not be affected by the new town centre which will operate at a different level within the retail hierarchy.

**Question 1.x Would other land not identified on Inset H of the Policies Map be required to facilitate storm and foul drainage arrangements?**

- 1.42 The Water Cycle Study (WCS) report (2014) prepared for RLW (see Appendix 12) sets out the proposed approach to dealing with surface water and foul drainage.
- 1.43 The need for a new Water Recycling Centre (WRC) is addressed in our response to question 1(v) above. The WCS proposes the WRC be located between the railway line and the River Cam, outside the Development Site area.



- 1.44 Some of the water storage areas and SUDS features are also likely to be located outside the development area to the north and east of the site.
- 1.45 The above strategy has been agreed by relevant stakeholders as shown within the supportive correspondence at Appendix 13.

**Question 1.xi Should the policy specifically require a surface water and foul water drainage water strategy?**

- 1.46 These requirements would be met through the SPD and application processes. The WCS report sets out the proposed approach to dealing with surface water and foul drainage, as supported by relevant stakeholders.

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## **2. FUTURE AREA ACTION PLAN DEVELOPMENT PLAN DOCUMENT (AAP)**

**Question 2.i 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?**

- 2.1 An AAP is not the most appropriate mechanism for implementation of the development and is not sound in terms of the tests in paragraph 182 of the NPPF, particularly that the Plan is "effective" (and deliverable over its period) and consistent with national policy.
- 2.2 Therefore, an AAP could unduly delay the plan-making process and render the policy ineffective for that reason.
- 2.3 SCDC have taken legal advice on this matter, and been advised by the Planning Officers Society (POS). Both confirm that the AAP route would be unnecessarily cumbersome and time-consuming, and could lawfully be replaced by an SPD. RLW have received similar advice from Richard Harwood QC.
- 2.4 An SPD would fulfil the required functions of a secondary planning document in this instance and offer clear advantages in supporting the effectiveness of the Local Plan.

**Question 2.ii 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?**

- 2.5 There is no need to refer to this matter in the Policy. It will be addressed through the SPD and more particularly through EIA and technical assessments that are application submission requirements.

**Question 2.iii Paragraph 6p: Would the assessment of heritage assets also include World War II structures on the site which may be worthy of retention?**

- 2.6 This would be covered within heritage assessments under NPPF requirement to consider impacts on non-designated heritage assets, as well as being referenced as a requirement within Policy SS/5.

**Question 2.iv 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?**

- 2.7 Yes, based on assessment of ecological conditions and impacts by both promoting parties.
- 2.8 The Site has been subject to a suite of ecological surveys: badger, bats, water vole, amphibians, reptile, birds, invertebrates, Phase 1 Habitat Survey (RD/RWL & DIO/090) and detailed (targeted) botanical survey.

- 2.9 Any lost habitat can be compensated through habitat creation, enhancement and management on land within development area itself, within the setting of the abbey and to the north of the proposed development area.
- 2.10 Detailed Landscape/ Biodiversity Management Plans supporting future planning applications, will ensure adequate mitigation.

**Question 2.v 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?**

- 2.11 The relocation of the station will increase the access distance for some residents in the southern part of Waterbeach village, but for other residents access distances will be improved. Recent residential permissions in the Bannold Road area have, to an extent, altered the distribution of population within the village, skewing this more towards the north. This is illustrated through isochrone plans at Appendix 14 and in the report at Appendix 2.
- 2.12 The station access facilities would be improved for all residents to an extent not possible at the existing station. The new station would also resolve risks and congestion associated with the existing station and level crossing.
- 2.13 There will be increased densities around the new station in line with Government policy.

**Question 2.vi 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**

- 2.14 It is not considered that such cross-referencing is required. This would represent replication of NPPF policy requirements.

**Question 2.vii 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?**

- 2.15 The EA released, on 19th February 2016, new climate change guidance that forms supplementary guidance to the National Planning Policy Framework (NPPF).
- 2.16 This guidance recommends, for Anglian region and the design life of the development, to include a climate change allowance for peak river flows from 25% CC allowance (Central Percentile) up to 65% CC allowance (upper end) for peak river flow.
- 2.17 A detailed site-specific flood risk assessment was carried out for the site in 2012 (ref: RD/RWL & DIO/150) following consultation with the Environment Agency (EA).
- 2.18 Further hydraulic modelling was undertaken in 2014 in liaison with the EA, to determine the residual risk of flooding at the proposed site from a breach in the River Cam flood defences

under a 1 in 100 year plus climate change flood event. The WCS includes the outcomes from this detailed hydraulic modelling exercise.

- 2.19 The increase in the climate change allowance will have limited impact on the extent of flooding (although it is anticipated that the depth of flood water might increase slightly) and flood mitigation measures can be specified to provide the necessary resilience against climate change.

**Question 2.viii Paragraph 6jj: Should reference also be made to the creation of appropriate community governance arrangements to assist the development of the new community?**

- 2.20 RLW have prepared strategy documents which have focussed on RLW's (and the landowners they represent) long-term commitment to the new community (e.g. ref: RD/RWL & DIO/030, '*DJ Delivery & Viability Report Summary*' (September 2008)).

- 2.21 We anticipate that this matter will be addressed through the SPD process.

**Question 2.ix 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?**

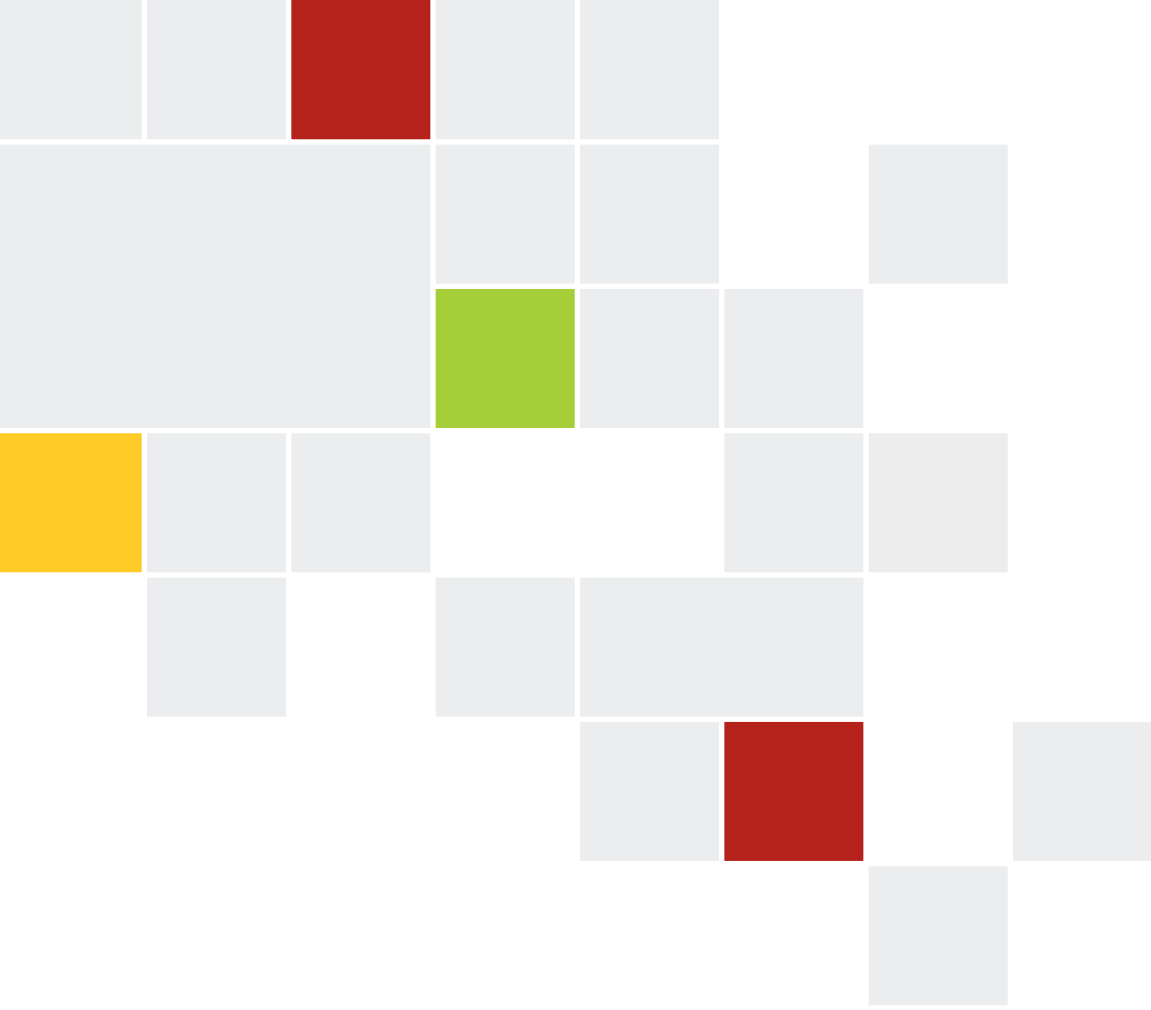
- 2.22 A Phase 1 Geo-Technical Risk Assessment has been undertaken by MM on behalf of RLW (Ref: RD/RWL & DIO/120). No major constraints have been identified and no unforeseen costs or viability issues are anticipated.

### **3. COUNCIL'S FURTHER PROPOSED MODIFICATIONS NOVEMBER 2016**

**Question 3.i Are these modifications necessary to ensure the soundness of the Plan?**

- 3.1 Yes, in so far as these relate to the allocation of the new town at Waterbeach under the terms of Policy SS/5.





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