

APPENDIX A

Draft Waterbeach New Town Supplementary Planning Document (SPD)

Consultation Statement and Proposed Changes

Background

South Cambridgeshire District Council (SCDC) as the Local Planning Authority has been developing a draft SPD in consultation with the local community and other stakeholders since mid-2017. The purpose the document is to assist in delivering the objectives of policy SS/6 (Waterbeach New Town) of the South Cambridgeshire Local Plan which was adopted on the 27th September 2018. Section 17 of the policy states that an SPD will be prepared for the site to provide further detailed guidance on the implementation of policy SS/6.

The draft SPD is structured in six chapters:

1. Introduction
2. Site Context
3. Vision
4. Spatial Framework
5. Guiding Principles
6. Delivering the Place

This consultation statement has been prepared in accordance with the Town and Country Planning (Local Plan) (England) Regulations 2012. Regulation 12 requires that SCDC prepare a consultation statement setting out the persons consulted when preparing the SPD, a summary of the main issues raised by those persons and how these have been addressed in the SPD.

Preparation of the draft SPD

The site is located between Waterbeach village to the south, Denny Abbey to the north, the A10 to the west and the railway line to the east. The western part of the site constitutes a former military airfield and barracks whilst the eastern part of the site is in agricultural use.

The District Council as the Local Planning Authority has been working in partnership with Cambridgeshire County Council, the landowners and local interest groups to consider ways to deliver development on site in a successful manner. In preparing the draft SPD, a workshop took place in July 2017, and the comments provided at this workshop proved valuable in helping shape the document prior to subsequent discussion with representatives of the Waterbeach Neighbourhood Planning Group.

Comments from these discussions have informed the development of the SPD. A summary of these comments and how they have been addressed in the development of the SPD are set out below. In addition four meetings have been held with SCDC officers and representatives of the surrounding parish councils (15 August, 11 October and 21 December 2017) as well as the Waterbeach Community Forum on 14 March 2018 to which residents from all the villages were invited.

WORKSHOP COMMENTS	SCDC RESPONSE
PLACE / VISION / DESIGN	
Need to maximise the potential of the site to	The SPD explores the constraints and

foster a sense of identity and ownership.	opportunities of the site, and provides guidance to support the creation of a vibrant, high quality new settlement.
Retain some existing barracks buildings to contribute to a sense of place and create distinct neighbourhoods based on the existing landscape and historical context.	Most of the barracks buildings will be removed. It is intended to retain the sports centre building and possibly the control tower.
Integration between the new town and the village is important, alongside calls for consideration of a soft buffer between the built environments.	<p>Linkages between the village and the proposed new town will be very important to the overall success of the place, and these linkages will primarily take the form of pedestrian and cycle connections. Other than for a small area accessed off Cody Road and Abbey Place to enable access to the relocated railway station, all motor vehicular traffic, other than for public transport, will be restricted between the village and the town.</p> <p>A soft buffer is proposed along the south western edge of the development, as well the retention of the landscaped entrance to the existing barracks site.</p>
Mixed views on a range of densities – with particular concerns about over development and the height of potential buildings due to a lack of precedent for tall buildings in Cambridgeshire. However, some welcomed the provision of more green space and legibility that tall buildings could bring.	A range of housing densities will be appropriate at the proposed new town. It will have a population broadly similar to nearby existing towns such as Huntingdon and Haverhill, places which have a wide variety of building types. Moreover, it will be similar to Northstowe in many regards, such as population size, former use, and location close to existing villages.
Building design should be coherent and should reflect local vernacular architecture.	The overall town plan will be expected to follow a coherent structure and through the use of design coding a coherent approach to building design will be expected to be achieved. Over such a large development however it is neither desirable nor achievable to have the entire development following one particular design rationale. Existing towns and villages have usually followed a process of gradual evolution, and although Waterbeach New Town will not evolve over such a long period of time, it is expected that it could take over 25 years to complete.
Retain the fen edge and vistas from the site. Boundaries with the fen edge should be congruous.	Addressed in the SPD, the proposed new town should be designed to maximise the views out of the site towards the fen edge. This will be particularly important along the northern and eastern edge of the site.
Inter-visibility between Denny Abbey and the development should remain alongside calls for a strong landscape buffer.	Addressed in the SPD, the proposed new town should be designed to both create a strong landscape design along the northern

	edge with Denny Abbey, but also to create filtered views so that there will be new views created between the new town and the wider landscape.
Historic causeways should be seen as a historic place making opportunity.	The SPD seeks that the historic causeways such as the Fen Causeway between the village and the Abbey, and Bannold Drove, will be incorporated into the development proposals. The part of the Fen Causeway between the village and the Abbey will deviate from its original course towards the lake.
Concerns raised over using Lakeside as 'the centre' but acknowledgement that it is an asset and a significant feature.	The proposed town centre will be expected to be located closer to the existing village. The lakeside should be a destination in its own right.
CONNECTIVITY	
Major concerns over A10 congestion and air quality, which would be worsened by development.	A range of measures have been identified providing opportunities for future residents to use other modes of transport other than the car to get to work. High quality cycle connections and an improved railway station could help.
Concern over potential 'rat running' through the existing village. It was noted however that restriction of general access would be impractical and undesirable.	Motor vehicular movement between the village and the new town will be restricted at the current access to the barracks. There will still be opportunities for motor vehicles to access the village from the new town by using the existing access off the A10, i.e. Denny End Road and Car Dyke Road.
Multiple points of access from existing village would benefit the whole community. There should be a minimum of 2 access points off the A10.	Two points of vehicular access off the A10 are proposed. Cycle and pedestrian access points are proposed along Denny End Road, Abbey Place, Cody Road, Bannold Drove and Long Drove.
The relationship with the existing village should be meaningful and relate to the primary movement network.	<p>The relationship with the existing village will be meaningful through the shared use of facilities and resources. For example the existing village has sporting, leisure, shops and employment facilities that will be used by the new community.</p> <p>The new town will provide a new safe cycle route from the village to the research park and other employment areas to the north west of the site, as well as providing new facilities such as a new secondary school and other shops and leisure facilities which will be easily accessible from the village.</p>
Strong support for an increased focus on sustainable modes of travel and the creation of walkable neighbourhoods, including an ambition for all children to be able to walk	There will be a strong focus on the creation of direct and safe cycle and pedestrian routes throughout the site, with an emphasis on these modes of transport over cars.

and cycle to school. A safe and permeable street network is required.	
Acknowledgement that a new station is needed with strong pedestrian and cycling links from the existing village as well as car and cycle parking.	The new station will be located in a position as close to the existing village as possible, with direct vehicular access from the village, using Cody Road.
Better bus service needed to Cambridge (especially in the evening).	Improvement of bus services is addressed in the SPD, and would be addressed in s106 agreement between the developers and the Local Planning Authority, and the increased patronage that will come from the demand from the new town. Any bus service connecting the village and the town will use the existing access to the barracks.
SUSTAINABILITY	
Site promoters should pursue exemplar status – eg set out towards a zero carbon ambition, and adopt sustainable development strategies and philosophies.	The SPD sets out aspirations for excellence in sustainable development. These will be developed through the planning application process.
Clear proposals for water and green infrastructure should be developed.	The SPD sets out aspirations for excellence in sustainable development. These will be developed through the planning application process.
EMPLOYMENT AND ECONOMY	
Retail needs to be addressed early in the development process.	A retail strategy will be required that will take into account the changing requirements for retail. Such a strategy was required on the Northstowe development and this strategy is coming forward on that development at the moment.
Strong support for the town centre closer to the existing village and to incorporate a pedestrian friendly public realm in the town centre.	The town centre has moved closer to the village from previous iterations. It is intended that through the use of design coding it will make sure that the town centre will be pedestrian focussed.
Desirable to locate retail in close proximity to the train station and the lake.	As well as a town centre, there will be expected to be local centres of activity by the railway station and the lake.
Small scale retail and pubs etc, should be located within each neighbourhood for convenience.	As well as those centres, a further local centre is proposed to be located at the north eastern corner of the development that will incorporate small scale retail and other facilities.
Need to maximise opportunities for micro employment.	It is not expected that Waterbeach will be self sufficient in employment space, but employment space will be required.
Development should engender opportunities for flexible and adaptable working patterns, eg. working from home and pop up business spaces.	It is not expected that Waterbeach will be self sufficient in employment space, but employment space will be required.
GOVERNANCE AND PHASING	

The design of the settlement needs to be flexible and resilient in order to function should the new station not be developed.	The local plan requires that the development includes a relocated railway station.
Interim facilities during the first phase may be appropriate and will help to establish a sense of identity early on in the development.	There will be a requirement to set out governance arrangements both at the interim and final stages of the development.
A strong preference for the first phase of development to be located close to the existing village to promote community cohesion.	It is envisaged that the first phase of development will include a development area that encompasses the northern entrance to the site, the lakeside area and the town centre.
Request for a s106 agreement to pay for a community worker to help set up play groups / run community events etc, in order to help facilitate community integration.	Community worker(s) will be requested as part of the s106 negotiations to help with community integration.
Need to consider the life cycle of the town – likely to be dominated by younger people with families at the beginning, with the population getting older over time.	It is anticipated that the development will take into account the needs of a younger population at the beginning of the development, and this will include the early provision of infrastructure such as the first primary school.
Need for the consideration of ownership and governance of future community space and facilities, with an ambition to protect them for the community's interest over the long term.	This important element of the development has been considered as part of the s106 process.
COMMUNITY AND SOCIAL INFRASTRUCTURE	
Existing facilities within Waterbeach village will face increasing population pressures, and will need more investment, eg library and primary school.	It is intended that the new development will provide its own facilities. It is not intended that the development will contribute to improving the existing primary school, as it will provide 5 new primary schools.
Desire to retain existing sports and recreational facilities provided at the Barracks.	The sports centre will be retained in the short to medium term until such time when it will need to be replaced.
New community facilities should be easily accessible for existing residents.	Facilities within the proposed town centre, station district, lakeside and south park will be most easily accessible for existing residents. As the development progresses more facilities will become available and easily accessible by footpath and cycle.
Important that development includes space for incidental interaction to support community integration.	Facilities will be provided for at appropriate stages in the development of the new town to support community integration.
Need for many community and recreational facilities up front and which have a multi-functional capacity.	Community and recreational facilities will be provided for at appropriate stages in the development of the new town.
Strong desire to keep the lake for public use and to promote its enjoyment.	It is intended that the lake will be opened up for public access as a swimming lake and for other sporting uses.
NEIGHBOURHOOD PLAN GROUP EMERGING VISION AND OBJECTIVES	

VISION	
A great place to live and work.	The development will provide an appropriate amount of facilities accessible from the village.
The identity and character of the existing community should be respected and protected.	The proposed new town will have its own distinct identity, separate from the village. The identity and character of the village, based around the green and all the social infrastructure will not be affected. Indeed it would be expected that these facilities such as the pubs and churches will be enhanced by the residents of the new town.
Sustainable infrastructure should be provided.	The SPD includes guidance on phasing, all relevant and necessary infrastructure will be provided at appropriate times throughout the timeframe of the development. This will include schools, playing fields and play facilities, open space, cycle and footpath routes, shops and road infrastructure.
Improvements to the quality of life of every resident.	The addition of new and improved infrastructure will improve the quality of life for residents of the village.
New development should not be overbearing or overwhelming.	Development will take place that should not be overbearing or overwhelming, taking into account the context of a new town.
New development should complement the rural vistas and existing fen edge landscape.	Development will take place that will complement the rural vistas and existing fen edge landscape, taking into account the context of a new town.
OBJECTIVES	
<i>Environmental</i>	
Reflect the current built form and rural setting.	The proposal is for a new town, and it would therefore be inappropriate to develop an overall design that reflects the built form and rural setting of the existing village.
Development that is sensitive to context.	The SPD includes extensive guidance. Development will take place that will complement the rural vistas and existing fen edge landscape, taking into account the context of a new town.
Development that protects and enriches the landscape and built setting.	The SPD sets out principles for the indicative locations of built form and its relationship with the wider landscape.
Transport improvements that prioritises pedestrians, cycling and public transport.	The SPD sets out principles for transport and movement.
Protection of green space, landscape and nature conservation.	The SPD sets out indicative locations for green space throughout the new town.
<i>Social</i>	
A housing strategy that is tailored to the needs of Waterbeach village.	The development will provide a variety of new types of housing, and will provide far more than is necessary to meet the needs of

	the village.
Sustain and improve local facilities.	The number of new dwellings and the construction workers that will be involved over the considerable time period of the development will enable the existing local facilities such as the pubs and shops in the village to be supported.
Ensuring that local people are involved in the planning and delivery process.	Processes will be put in place to ensure that the residents of the new town will be involved in its development as it progresses.
<i>Economic</i>	
Sustain and improve local facilities.	The number of new dwellings and the construction workers that will be involved over the considerable time period of the development will enable the existing local facilities such as the pubs and shops in the village to be supported.
Strengthen and support local economic activity.	The SPD includes that the development will provide safer pedestrian and cycle access to the existing employment area at the Cambridge Research Park.

Consultation on the draft SPD

A public consultation on the draft Waterbeach New Town SPD was held for 6 weeks between the 14th September 2018 and 26 October 2018. The proposed modifications address the issues raised by the consultation responses. Consultation on the SPD was undertaken in accordance with the Statement of Community Involvement adopted in 2010.

A Draft Final Sustainability Appraisal and Habitats Regulations Assessment Screening Report were completed and consulted upon for the emerging South Cambridgeshire Local Plan 2014 which proposed the allocation of the new town site for development. This consultation took place between 19 July and 14 October 2013. These documents, along with other supporting documents were also made available to view during this consultation. As the draft SPD supports the South Cambridgeshire Local Plan, there was no further need to undertake a separate Sustainability Appraisal or Habitats Regulations Assessment for this SPD document, although screening reports were completed and made available during the consultation.

The draft Waterbeach New Town SPD was consulted upon with the following accompanying documents:

- [Sustainability Appraisal Screening Report](#)
- [Habitats Regulations Screening Report](#)
- [Equality Impact Assessment](#)

Consultees

The following organisations (below) were directly notified of the draft Waterbeach New Town (SPD) in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) via email, or post where no email address was available (individuals are not listed). It should be noted that other individuals were also contacted that do not appear on this list.

Abellio Greater Anglia	National Housing Federation
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Age UK	National Trust
Airport Operators Association	Natural England
Anglian Water	Network Rail
British Gas	NHS Cambridgeshire and Peterborough Clinical Commissioning Trust
British Horse Society	NHS England
British Telecom	NHS Property Services
Building Research Establishment	Office of Rail Regulation
Cam Valley Forum	Papworth Hospital NHS Foundation Trust
Cambridge Council for Voluntary Service	Post Office
Cambridge Cycling Campaign	Ramblers Association
Cambridge Dial a Ride	Registered Providers
Cambridge Ethnic Community Forum	Renewable UK
Cambridge Forum of Disabled People	Road Haulage Association
Cambridge GET Group	Royal Mail
Cambridge Inter-Faith Group	Royal Society for Protection of Birds
Cambridge Past Present and Future	Scottish & Southern Electricity
Cambridge Research Park	Shelter
Cambridge University Hospitals NHS Foundations Trust	Skills Funding Agency
Cambridge Water (South Staffs Water)	Sport England
Cambridgeshire ACRE	Stagecoach East
Cambridgeshire and Peterborough Combined Authority	Sustrans
Cambridgeshire and Peterborough NHS Foundation Trust	Theatres Trust
Cambridgeshire Chamber of Commerce	Three
Cambridgeshire Community Foundation	Travel for Work Partnership
Cambridgeshire Constabulary	UK Power Networks
Cambridgeshire Ecumenical Council	Visit East Anglia Limited
Cambridgeshire Fire and Rescue Service	Vodafone & O2
Cambridgeshire Football Association	Waterbeach Waste Management Park
Cambridgeshire Local Access Forum	Whippet Coaches Limited
Cambridgeshire Race Equality and Diversity Service	Wildlife Trust
CamHealth - Local Commissioning Group	Woodland Trust
Campaign to Protect Rural England	National Housing Federation
CamToo Project	National Trust
Church Commissioners	Natural England
Cambridgeshire and Peterborough Combined Authority	Network Rail
Cambridgeshire and Peterborough NHS Foundation Trust	NHS Cambridgeshire and Peterborough Clinical Commissioning Trust
Cambridgeshire Chamber of Commerce	NHS England
Cambridgeshire Community Foundation	NHS Property Services
Cambridgeshire Constabulary	Office of Rail Regulation

Cambridgeshire Ecumenical Council	Papworth Hospital NHS Foundation Trust
Cambridgeshire Fire and Rescue Service	Post Office
Cambridgeshire Football Association	Ramblers Association
Cambridgeshire Local Access Forum	Registered Providers
Cambridgeshire Race Equality and Diversity Service	Renewable UK
CamHealth - Local Commissioning Group	Road Haulage Association
Campaign to Protect Rural England	Royal Mail
CamToo Project	Royal Society for Protection of Birds
Church Commissioners	Scottish & Southern Electricity
Civil Aviation Authority	Shelter
Confederation of British Industry	Skills Funding Agency
Conservators of the River Cam	Sport England
Country Land & Business Association	Stagecoach East
DB Schenker Rail	Sustrans
Denny Abbey Farmland Museum	Theatres Trust
Department for Business Innovation and Skills	Three
Department for Transport	Travel for Work Partnership
Department of Environment, Food and Rural Affairs	UK Power Networks
Design Council	Visit East Anglia Limited
Disability Cambridgeshire	Vodafone & O2
Education Funding Agency	Waterbeach Waste Management Park
EE	Whippet Coaches Limited
Ely Diocesan Board	Wildlife Trust
Environment Agency	Woodland Trust
English Heritage	National Housing Federation
EON UK	National Trust
Equality and Human Rights Commission	Natural England
Federation of Small Businesses	Network Rail
Fields in Trust	NHS Cambridgeshire and Peterborough Clinical Commissioning Trust
Forestry Commission	NHS England
Freight Transport Association	NHS Property Services
Friends of the Earth	Office of Rail Regulation
Greater Cambridge Partnership	Papworth Hospital NHS Foundation Trust
Gypsy & Traveller organisations	Post Office
Hazardous Installations Inspectorate	Ramblers Association
Health and Safety Executive	Registered Providers
Department for Business Innovation and Skills	Renewable UK
Department for Transport	Road Haulage Association
Department of Environment, Food and Rural Affairs	Royal Mail
Design Council	Royal Society for Protection of Birds

Disability Cambridgeshire	Scottish & Southern Electricity
Education Funding Agency	Shelter
EE	Skills Funding Agency
Ely Diocesan Board	Sport England
Environment Agency	Stagecoach East
English Heritage	Sustrans
EON UK	Theatres Trust
Equality and Human Rights Commission	Three
Federation of Small Businesses	Travel for Work Partnership
Fields in Trust	UK Power Networks
Forestry Commission	Visit East Anglia Limited
Freight Transport Association	Vodafone & O2
Friends of the Earth	Waterbeach Waste Management Park
Greater Cambridge Partnership	Whippet Coaches Limited
Gypsy & Traveller organisations	Wildlife Trust
Hazardous Installations Inspectorate	Woodland Trust
Health and Safety Executive	Shelter
Highways England	Skills Funding Agency
Historic England	Sport England
Home Builders Federation	Stagecoach East
Homes England	Sustrans
Hunts Health - Local Commissioning Group	Theatres Trust
Internal Drainage Boards	Three
Lawn Tennis Association	Travel for Work Partnership
Local Nature Partnership	UK Power Networks
Local stakeholders and businesses	Visit East Anglia Limited
National Grid	Vodafone & O2
National House Building Council	Waterbeach Waste Management Park
	Whippet Coaches Limited
	Wildlife Trust
	Woodland Trust

MPs, COUNCILS & COUNCILLORS

MPs for South East Cambridgeshire, South Cambridgeshire and Cambridge	Histon & Impington Parish Council
Cambridge City Council	Horningsea Parish Council
Cambridgeshire and Peterborough Combined Authority	Landbeach Parish Council
Cambridgeshire County Council	Lode Parish Council
East Cambridgeshire District Council	Milton Parish Council
Cambridgeshire County Councillors for South Cambridgeshire and East Cambridgeshire districts	Stow-cum-Quy Parish Council
East Cambridgeshire District Councillors	Stretham Parish Council
South Cambridgeshire District Councillors	Swaffham Bulbeck Parish Council

South Cambridgeshire Youth Council	Swaffham Prior Parish Council
Burwell Parish Council	Waterbeach Parish Council
Cottenham Parish Council	Wicken Parish Council
Fen Ditton Parish Council	

Other methods of notification include:

- a public notice in the local newspaper on the 19th September 2018;
- through the Council's webpages and social media; and
- A local exhibition.

A public local exhibition was held in the village on **Monday 8th October 2018** at the Salvation Army Hall, 7 Station Road, Waterbeach, CB25 NHT between the hours of 12.30 and 7.30pm, when officers were on hand to answer questions.

61 people visited the exhibition, the main topics of discussion included transport, the relocated station, provision for cyclists and equestrians, utilities, and the relationship of the new town to the existing village.

The exhibition was then on display until the end of the consultation period at:

- South Cambridgeshire District Council offices at South Cambridgeshire Hall, Cambourne, Cambridge CB23 6EA (8.30am – 5.00pm Monday to Friday)

The public exhibition could also be read on-line by viewing the [Waterbeach New Town SPD PDF](#).

Consultation Methodology

A 6 week consultation period for the draft SPD took place from:

5pm on 14 September 2018 to 5pm on 26 October 2018

The draft SPD and other relevant documents were available for inspection during the consultation period at the following locations:

Online on the council's website:

<http://www.scams.gov.uk/planning/local-plan-and-neighbourhood-planning/emerging-local-plans-and-guidance/waterbeach-new-town-spd/>

The SPD and supporting documents were available for inspection at:

- **South Cambridgeshire District Council offices at:**
South Cambridgeshire Hall, Cambourne, Cambridge CB23 6EA (8.30am – 5.00pm Monday to Friday).
- **Waterbeach Library Community Centre**, High Street, Waterbeach, Cambridge CB25 9JU (2.45pm – 5pm Monday; 2.45pm-5pm,6pm-8pm Wednesday; 2pm-5.30pm Friday; 10am-12noon Saturday).

The Council also prepared a [Summary Consultation Leaflet](#).

Comments could be made using:

- the online consultation system: <https://scams.jdi-consult.net/localplan/>; or
- by completing the consultation response form and either emailing or posting it to the Council at ldf@scams.gov.uk or South Cambridgeshire Hall, Cambourne Business Park, Cambourne, CB23 6EA.

Consultation Outcome / Key Issues Raised

During the consultation, 361 representations were received, made by 96 respondents. Of the representations 58% were objections, 5% of representations were supports and 37% were comments.

The main issues raised included:

- the spatial layout of the new town
- building heights and dwelling capacity
- the relocated railway station
- ransom and delivery issues
- flood risk
- schools and air pollution
- water recycling
- village separation
- SPD process
- equestrian issues

The following series of tables identifies the representations received to each part of the SPD, summarises the main issues raised, provides a Council assessment of the issues and where necessary what proposed modifications to the SPD are indicated.

Summary tables of main issues raised, Council assessment and proposed modifications

Executive Summary and Foreword				
Representations Received	Support: 0	Object: 1	Comment: 0	Total: 1
Main Issues in reps 67406	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • RLW Estates Concerned that the delivery and review groups will not be sufficient to deliver the allocation but are not a substitute for clear specification of conditions and principles in the SPD. • RLW Estates The output from such groups will not be binding on the parties involved without mechanisms to ensure this. They are unlikely to work well when one party is attempting to ransom the other. <p>Comment</p>			
Council's Assessment	<p>As the site is in multiple land ownerships, the draft SPD has been prepared to guide a comprehensive approach to development and infrastructure across the whole site. This is to ensure the new settlement is delivered as a single unified development. Chapter 6 sets out an approach to delivery that requires coordination between the two developers. It seeks to achieve this by requiring, through s106 agreements and planning conditions, that delivery and review groups to be established that include the developers as well as South Cambridgeshire and Cambridgeshire County Council. Whilst it is acknowledged that</p>			

	the output from these groups could not be made binding on the parties involved, it is possible to secure an agreement for joint working, collaboration and compatibility through a site wide collaboration agreement or Memorandum of Understanding. The SPD already provides considerably more detail than would normally be provided on issues of delivery in a site development SPD and further detail is not considered necessary or proportionate.
Proposed Modifications	No modifications are proposed in response to representations on the Executive Summary and Foreword.

Section 1: Introduction

1. Introduction				
Representations Received	Support: 0	Object: 38	Comment: 12	Total:50
Main Issues in reps 67386 67363 67438 67550 67316 67275 67312 67336 67338 67325 67324 67567 67322 67282 67331 67461 67346 67458 67462 67450 67463 67460 67525 67366 67526 67436 67437 67439 67459 67469 67471 67470 67508 67371 67372	Support Object <u>Member & consultation processes</u> <ul style="list-style-type: none"> • Waterbeach Neighbourhood Plan Steering Committee no evidence in SPD that any consideration has been given to work done by NP steering group and evidence that has been compiled during consultations with Waterbeach village residents during last 3 years. • Waterbeach Parish Council Consultation ahead of adoption of Local Plan & unsure if Scrutiny committee and Cabinet concerns have been applied. If not, SPD should be redone Public consultation has been very rushed and should have been after Local Plan adoption. • Rushed through Member process. • Policies map still needs to be completed to make plan sound. "up to Sept 2018 prep SPD in accordance with Town and Country Planning res 2012". Does not refer to adopted local plan which should inform the SPD. • SPD does not reflect policies (main modifications) in the local plan which are required to make the plan sound. • SPD deficiencies in respect of soundness; drafted before Local Plan adopted. Inspector's recommendations and main modifications included? – many omissions. Member process rushed - concerns raised. Statutory consultees concerns. Lack of fair and proper consultation. Recommend non-adoption of it as submitted. <u>Comprehensive & collaborative approach</u> <ul style="list-style-type: none"> • Major objection that the plan relies on 2 developers acting in their own interests to the detriment of the wider vision and its delivery. SPD should mandate that a single joint planning application should be submitted. • SPD includes emphasis on a comprehensive and collaborative approach but lacks clear measures to achieve this. Needs binding and enforceable provisions. Coordinate 2 planning applications. 			

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- Urge Land owners and developers to consider that profit does not come before people and place. No requirement for housing delivery in early years. Opportunity to review progress in joint local plan.

Format & content of SPD

- **Carbon Neutral Cambridge** Welcome acknowledgement within SPD there is need for climate change mitigation as well as capability to adapt to climate change. Words need to be backed up by (a) being clear about overarching aims and objectives and (b) policies in place which are consistent with these.

Vision

- **Carbon Neutral Cambridge** Support the vision of delivering "an example of excellence in sustainable development". SPD will not deliver this, contrary to policies set by the Climate Act 2008, the NPPF (July 2018) and SCamb local plan policy SS/6.
- Lacks vision.

Vision and movement

- Several expressions of support Waterbeach Cycle Campaign "People First" vision.
- Major concerns the SPD will lead to a car centric development which prioritises space for cars over space for people.
- SPD will not deliver the vision of a development with high levels of cycling and walking as it prioritises motorised vehicles to detriment of existing and new residents.
- Concerns about primary roads through centre of development & proximity of schools next to roads & impacts on existing village, particularly using Cody Road to access station.
- Don't relocate the station until new development is larger than existing village.
- Ban construction traffic from existing village.
- Great opportunity to realise a world-class development with sustainable transport integrated from the beginning. SPD has street network that encourages people to drive, even for short trips, by making it direct to drive and easy to park cars. Result in much more congestion, pollution and road injury.

Comment

Format & content of SPD

- **Cambridgeshire County Council** comment that SPD reflects engagement to date, but SPD needs more flexibility to address additional infrastructure demands from current planning applications for 11,000 houses. Local Plan objectives for a comprehensive development needs to be translated into greater cooperation between the developers.
- **Defence Infrastructure Organisation and Urban &**

	<p>Civic SPD welcomed. Considerable progress in evolving content over recent months, in parallel with outline planning applications, and emerging legal framework for joint working between landowners and promoters. Endorse approach to spatial framework and delivery.</p> <ul style="list-style-type: none"> • Historic England Welcome SPD to support Local Plan Policy, guide developers and help guide the preparation and assessment of future planning applications. Document provides thorough basis for planning for this large development site. • Natural England strongly support SPD, spatial framework and aims for comprehensive sustainable development, and a collaborative and coordinated approach to delivery. SPD should be adopted prior to determining planning applications. Strong emphasis on creation, integration and enhancement of Strong emphasis on creation, integration and enhancement of rich biodiversity of the local fenland landscape, sensitively incorporating existing green and blue infrastructure into the new town and creating new ecology corridors. Support comments by National Trust & Wildlife Trust that SPD should promote use of Natural Cambridgeshire Local Nature Partnership's Developing with Nature Toolkit. • Wildlife Trust welcomes the emphasis on a coordinated approach to design and delivery of the new town. Essential to achieve a high quality and sustainable new settlement, that delivers on many of the requirements and aspirations set out. Broadly supportive of approach to provision of green infrastructure and biodiversity enhancements, although reference should be made to need for a net gain in biodiversity, in line with NPPF. Important adopted before planning applications are considered. Essential that consultees be given more time to respond to applications to frame our responses having regard to adopted SPD. • Disappointed SPD essentially a combination of 2 planning applications driven by developers not the Council. • Language too rambling and vague rather than expressing certainty and obligation. Few examples of good practice. <p><u>Vision and movement</u></p> <ul style="list-style-type: none"> • Broadly support principle of a new town & vision for high levels of active travel but SPD does not go far enough and is car centric. • Concerns about primary roads through centre of development & proximity of schools next to roads & impacts on existing village, particularly using Cody Road to access station. • Waterbeach Cycle Campaign propose a "People First" vision. [several expressions of support for this vision]. • SPD does not provide sufficient guidance to encourage non motor vehicle transport use. • Plan must focus on walking and cycling as primary
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	<p>transport options, in conjunction with public transport. Current plan will flood the area with vehicle traffic.</p> <ul style="list-style-type: none"> • Major concerns the impact that the development will have on existing village, especially for residents in the Cody Road area. • WCC are interested in being a member of the Transport Strategy Review Group.
<p>Council's Assessment</p>	<p><u>Member & consultation processes</u></p> <p>Consultation on the SPD followed our adopted 'Statement of Community Involvement' and so conformed to our standard practice. This involved written notifications to stakeholders and known individuals, media releases and a well attended local exhibition in the village. 96 respondents have made 361 representations on the SPD. The SPD records engagement with the Neighbourhood Planning Group at page 10. Preparation of the Neighbourhood Plan is proceeding but no draft plan has yet been shared with this Council. Consultation on the SPD commenced after the receipt of the Local Plan Inspector's Report which concluded that the Local Plan was 'sound' subject to modifications, all of which modifications have been included in the Local Plan and into policy SS/6 for Waterbeach New Town. The SPD guidance is in conformity with policy SS/6 and the Local Plan which was adopted on the 27th September 2018. In these circumstances it was appropriate to commence a 6 week consultation on the 14th September.</p> <p><u>Comprehensive & collaborative approach</u></p> <p>The SPD will help to ensure the comprehensive development of the new town but it cannot require that the two developers submit a single planning application for its development. Nor can it overcome the need for separate financial arrangements being made between the two developers which are common features of developments where there is more than one landowner.</p> <p><u>Format & content of SPD</u></p> <p>Welcome support. Note that the SPD is not a combination of the 2 planning applications, any SPD and planning applications prepared in accordance with Local Plan policy SS/6 will inevitably contain many similarities.</p> <p><u>Vision and movement</u></p> <p>Welcome support. The SPD has been prepared to conform with the Local Plan 2018 policy SS/6 and with the NPPF 2012. The Local Plan Inspector has found the new town allocation and policy SS/6 to be 'sound' and it follows that it can be considered to be in accordance with national planning policy and other statutory requirements.</p> <p>Disagree that the development is car-centric or the SPD does not provide evidence to meet its high aspirations regarding cycling</p>

	<p>and walking. Guiding principle 3 on page 83 is all about creating a high quality environment for cycling serving the whole town and focussed on key destinations. To include:</p> <ul style="list-style-type: none"> • A dense network of routes which accommodate cycling for local and longer distance travel for a wide range of users at frequent intervals, is of a high standard and is direct; • Primary streets which include segregated cycle paths; • Permeable street and cycle networks which provide a choice of routes for cyclists; • Green corridors with shared cycle and foot paths; • Safe crossing points where cycle routes cross streets, which give priority to cyclists over cars; • Connections to the national cycle network and other strategic cycle routes beyond the site; • Secure and enclosed cycle parking at local centres (in particular at the new rail station), key destinations and facilities, as well more generally within the public realm and open spaces; and • Bike & Ride facilities at the railway station, with a high volume of secure parking. 'Bike & Go' hire facilities should be provided for visitors to the New Town. Spaces should be allowed for an associated cycle repair and sales centre at the relocated railway station cycle park. <p>Access to the new station via existing village roads will be unavoidable until a new road linking to the A10 has been completed. This issue was fully taken into account during consideration of the planning application for the new station which has now received planning permission.</p>
Proposed Modifications	No modifications are proposed in response to representations on the Introduction.

1.1 Background				
Representations Received	Support: 0	Object: 1	Comment: 0	Total: 1
Main Issues in rep 67340	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • Overall number of dwellings <p>Comment</p>			
Council's Assessment	The issue of the capacity of the site is considered elsewhere in this assessment of consultation responses.			
Proposed Modifications	No modifications are proposed in response to representations on section 1.1 Background.			

1.2 Purpose and Scope				
Representations Received	Support: 0	Object: 2	Comment: 0	Total: 2

Main Issues in reps 67408 67409	Support Object <ul style="list-style-type: none"> • RLW Estates SPD needs to be much clearer on what information will be expected and when. Commonality in approach of two promoters to strategic elements of infrastructure is essential if aspirations are to be achieved in respect of place-making, quality and delivery of a "single integrated new town". • RLW Estates Endorse principle of defining "fixes", "principles" and "mechanisms" and definitions. Definition of 'fix' should be consistent and clear across document. Broad locations and interrelationship of the spatial elements important at this stage with detail to be tested through planning applications. Comment
Council's Assessment	The Waterbeach New Town provides much more detail than other site-specific SPDs on such matters as the provision of social and physical infrastructure and the mechanisms to be used to secure its delivery. The SPD establishes an indicative common Strategic Framework Diagram to show how the different structural elements of the new town will relate to each other.
Proposed Modifications	No modifications are proposed in response to representations on section 1.2 Purpose and Scope.

1.3 Key issues				
Representations Received	Support: 0	Object: 3	Comment: 2	Total: 5
Main Issues in reps 67362 67473 67407 67517 67487	Support Object <ul style="list-style-type: none"> • RLW Estates SPD should set out basis for a binding legal framework and planning conditions that will guarantee comprehensive and integrated development. Necessary foundation and pre-condition for successful engagement, collaboration and co-ordination between site promoters. • Waterbeach Parish Council Relationship with existing village should reflect policy SS/6. Some separation provided to protect character and identify of village. Serious concerns regarding multiple ownership and impact on delivery process. • Drainage and sustainable waste policies need to remain high priorities and realistic support for community development needs to be itemised. WPC's views must be sought and respected. Comment <ul style="list-style-type: none"> • Historic England Key Issues 1 & 5 - welcome references to the need for comprehensive development, and the sensitive historical location and proximity of Denny 			

	<p>Abbey, but other designated assets need to be referenced. Agree Major Development Site boundary outside of which no development permitted.</p> <ul style="list-style-type: none"> • Wildlife Trust Suggest second paragraph of Key Issues point 4 be edited to read "As well as protecting and promoting ecological habitats to deliver a net gain in biodiversity, and providing key place-making benefits..."
Council's Assessment	<p>Welcome support.</p> <p>Policy SS/6 which the SPD is intended to supplement makes no mention of achieving net environmental gains on site. This is because this 'net gains' requirement is set out in the National Planning Policy Framework and does not need to be repeated in the Local Plan or in the SPD. Planning decisions are required by the NPPF to minimise impacts on and provide net gains for biodiversity.</p>
Proposed Modifications	<p>No modifications are proposed in response to representations on section 1.3 Key Issues. Also see the Council Assessment of section 2.5.</p>

1.4 Process and Programme				
Representations Received	Support: 0	Object: 2	Comment: 0	Total: 2
Main Issues in reps 67433 67373	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • Waterbeach Neighbourhood Plan Steering Committee Little communication or inclusion of WNPSG or Neighbourhood Plan during production of SPD. Attach WNP Heritage and Character Assessment for consideration in informing SPD. Design principles package (by AECOM) for WNPSG imminent & will inform future decisions on planning matters arising within Waterbeach Parish. Fully support Waterbeach Parish Councils comments. • Support concerns of Environment Agency, Natural England and Heritage England regarding SEA screening; the proper environmental studies have not been completed & although outside strategic site Environment Agency's concerns about sewage works in level three flood zone close to banks of River Cam . <p>Comment</p>			
Council's Assessment	<p>The SPD records engagement with the Neighbourhood Planning Group at page 10. Preparation of the Neighbourhood Plan is proceeding but no draft plan has yet been shared with this Council. The WNP Heritage and Character Assessment from July 2018 attached to representations from the Neighbourhood Planning Group repeats much of the heritage and character evidence base underpinning the Local Plan. It had not previously been shared with this Council. It makes three brief references to</p>			

	<p>the new town allocation including stating '(The) New Town proposed at Waterbeach Barracks increases the sensitivity of the north western edge of the village. This is where the historical village will meet the proposed new development and will require appropriate design to allow for positive integration between the existing and the proposed settlements'. This approach is consistent with that of policy SS/6 and the SPD and it must be recalled that the Neighbourhood Plan is required to be in conformity with the Local Plan 2018 which includes the new town allocation.</p> <p>The Council assessment regarding Sustainability Appraisal / SEA screening can be found in this statement at pages 113 and 115</p>
Proposed Modifications	No modifications are proposed in response to representations on section 1.4 Process and Programme.

1.5 Planning Policy Context				
Representations Received	Support: 0	Object: 1	Comment: 0	Total: 1
Main Issues in rep 67288	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> Layout and relationship to Waterbeach village needs further consideration, either it's separate or it's not the developers cannot have the best of both worlds. <p>Comment</p>			
Council's Assessment	Local Plan 2018 policy SS/6 requires the new town to maintain the identity of Waterbeach as a village close to the new town with appropriate integration to enable village residents to access its services and facilities but with limited and controlled opportunities for direct road access and an emphasis on connections by public transport, cycle and on foot. The SPD is considered to address all of these policy criteria in an appropriate way.			
Proposed Modifications	No modifications are proposed in response to representations on section 1.5 Planning Policy Context.			

Section 2: Site Context

2. Site Context				
Representations Received	Support: 0	Object: 2	Comment: 4	Total: 6
Main Issues in reps 67488 67597 67551 67558 67612 67620	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> Section needs reviewing and updating to improve context regarding cycling to capture existing issues: National Cycle Route 11, quality of cycle path on A10, and lack of cycling infrastructure in village. 			

	<p>Comment</p> <ul style="list-style-type: none"> • Historic England Welcome references to various historic assets and features, and views to Ely Cathedral, but factual correction is needed in relation to ownership of Denny Abbey which is in guardianship of EH and open to public via management agreement. • Natural England Support recognition of sensitive location in relation to designated sites (Wicken Fen & Cam Washes). Provided detailed advice on potential for mitigation of impacts of recreational pressure to the planning applications but doesn't appear in Section 2.8. Also provided response on HRA and SA screening. Subject to mitigating increased visitor pressure, development provides unique opportunity to enhance connectivity with the wider countryside. Should be explored further with relevant parties. • Improve context regarding cycling to acknowledge historic issues with developing National Cycle Route 11, path alongside the A10 needs to acknowledge dangerous state of this section of cycle route. Factually incorrect stating there is limited existing cycling infrastructure within village or connecting to site.
Council's Assessment	<p><u>Cycling</u> Section 2.3 is considered to provide an appropriate high-level context with regard to cycling both within Waterbeach and the wider area.</p> <p><u>Denny Abbey</u> The SPD in section 2.2 correctly identifies that Denny Abbey is in the ownership of English Heritage.</p> <p><u>Natural England</u> The Council assessment regarding Sustainability Appraisal / SEA screening can be found in this statement at pages 113 to 115.</p>
Proposed Modifications	No modifications are proposed in response to representations on section 2 Site Context.

2.1 Location and Land Use				
Representations Received	Support: 0	Object: 1	Comment: 0	Total: 1
Main Issues in rep 67484	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • SPD is not clear on the different legal identities of greenfield / brownfield land. <p>Comment</p>			
Council's Assessment	The SPD correctly identifies that part of the site consists of previously developed land 'brownfield land' in regard to the barracks and airfield. It is not necessary for the SPD to provide a detailed analysis of the extent of brownfield and greenfield land			

	on-site. This was a matter considered during the preparation and examination of the Local Plan 2018.
Proposed Modifications	No modifications are proposed in response to representations on section 2.1 Location and Land Use.

2.3 Access, Movement and Connectivity				
Representations Received	Support: 0	Object: 1	Comment: 3	Total: 4
Main Issues in reps 67317 67286 67410 67328	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • RLW Estates Plan should record Bannold Drove as existing vehicle access point. Access also exists at Cross Drove. Bannold Drove is Byway Open to All Traffic. SPD inconsistent in how route is referred to - public right of way and bridleway. <p>Comment</p> <ul style="list-style-type: none"> • National Trust Comprehensive sustainable movement framework and potential connection to Cycle Route 11 in Figure 6 is noted. • Little in the way of existing cycle connectivity. National Cycle Route 11 should pass through Waterbeach, missing link between river and Lode village. No cycle parking in village and few cycle routes. Route along A10 towards Milton narrow and dangerous - cyclists cannot easily pass. No safe route going northbound. • Functionally no cycle infrastructure in Waterbeach currently for development to rely on. No recognition that development tends to degrade existing pedestrian and cycle infrastructure. 			
Council's Assessment	<p><u>Bannold Drove / Cross Drove</u></p> <p>Agree that Bannold Drove / Cross Drove are existing access points that should be shown on Figure 6.</p> <p><u>Cycling</u></p> <p>Section 2.3 is considered to provide an appropriate high-level context with regard to cycling both within Waterbeach and the wider area.</p>			
Proposed Modifications	Identify Bannold Drove and Cross Drove (at the north east corner of the site) as existing vehicle access points.			

2.4 Landscape, Ecology and Water				
Representations Received	Support: 0	Object: 2	Comment: 1	Total: 3
Main Issues in reps 67384 67475	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • New Town will have combined populations of Ely and 			

67518	<p>Newmarket. Sits on edge of fragile fenland landscape bordering designated heritage and biodiversity sites. Ancient Monuments & biodiversity sites.</p> <ul style="list-style-type: none"> • Policy SS/5 states new settlement should reflect surrounding fenland towns in design. Concept could be warranted in different (e.g. city/urban) landscape but is not acceptable on the Fen edge. Waterbeach and Chittering will be dwarfed. Absolutely no creative thought has been provided. Does not reflect architecture of existing village or surrounding fen edge villages. <p>Comment</p> <ul style="list-style-type: none"> • Wildlife Trust Should recognise existing areas of species-rich and semi-improved grassland within site as well as woodland & show links to Wicken Fen (figures 11 and 12). Reference should be made to achieving environmental net gains.
Council's Assessment	<p><u>Location</u></p> <p>The Waterbeach New Town site was allocated for development in the Local Plan 2018 following a thorough process of examination by the Local Plan Inspectors which took account of its location adjoining Waterbeach village, the proximity of biodiversity and heritage assets and the location of Chittering to the north of the site beyond Denny Abbey.</p> <p><u>Design</u></p> <p>In respect of design the SPD is consistent with policy SS/6 (previously policy SS/5) of the Local Plan 2018 which refers to it being a place with its own distinctive identity, founded on best practice urban design principles, drawing on the traditions of fen-edge market towns. The vision for the SPD states that the new town will be attractive and modern with well designed buildings, public spaces and landscapes which are beautiful and stand the test of time. It can be noted that the existing village contains architecture from many periods each of which reflect the society of the day and its access to different building materials.</p> <p><u>Wildlife Trust</u></p> <p>The SPD cannot provide a complete record of different habitats on the site, all of which must however be taken into account in the consideration of planning application proposals. Wicken Fen lies to the north east of the site beyond the River Cam and does not provide a key constraint to its development or a key opportunity for improved access which need to be shown on Figures 11 and 12.</p> <p>Policy SS/6 which the SPD is intended to supplement makes no mention of achieving net environmental gains on site. This is because this 'net gains' requirement is set out in the National Planning Policy Framework and does not need to be repeated in the Local Plan or in the SPD. Planning decisions are required by</p>

	the NPPF to minimise impacts on and provide net gains for biodiversity.
Proposed Modifications	No modifications are proposed in response to representations on section 2.4 Landscape, Ecology and Water.

2.5 Inherited Assets				
Representations Received	Support: 0	Object: 0	Comment: 1	Total: 1
Main Issues in rep 67489	<p>Support</p> <p>Object</p> <p>Comment</p> <ul style="list-style-type: none"> Historic England Section should be renamed 'The Historic Environment' as it encompasses all aspects of heritage including tangible heritage assets and less tangible cultural heritage. Other heritage in immediate surroundings, including Denny Abbey Refectory listed at grade I, barn to the north of Denny Abbey listed at grade II and Waterbeach Conservation Area to the south of the site - need to be specifically referenced. 			
Council's Assessment	Agree that the section could have a more informative title and that individual reference should be made to the Denny Abbey Refectory and to the barn just to the north of Denny Abbey. This section of the SPD is concerned with the on-site historic environment and so it would not be appropriate to refer to the Waterbeach Conservation Area which lies around the centre of the village and which is referenced elsewhere in the SPD for example at section 2.6.			
Proposed Modifications	Rename section 2.5 to 'The Historic Environment'. Add reference in section 2.5 to the Denny Abbey Refectory listed at Grade I and to the barn just to the north of Denny Abbey listed at Grade II.			

2.6 Surrounding Context				
Representations Received	Support: 1	Object: 1	Comment: 2	Total: 3
Main Issues in reps 67389 67388 67490	<p>Support</p> <ul style="list-style-type: none"> National Trust Support reference to the Wicken Fen Vision. <p>Object</p> <ul style="list-style-type: none"> National Trust Opportunities have been missed to look beyond immediate site boundaries and integrate site effectively with surrounding countryside. Site also has relationship to rural parts of East Cambridgeshire, located to the north east. <p>Comment</p> <ul style="list-style-type: none"> Historic England Welcome references to various historic assets needing to be preserved and, where appropriate preserved. Suggest reference is made to drawing on local 			

	<p>character, distinctive vernacular, and materials palette. Factual corrections to Figure 11 - grade II listed gate piers to Denny Abbey appear to be missing & use term Scheduled Monument.</p>
Council's Assessment	<p><u>National Trust</u></p> <p>Consider that section 2.6 makes appropriate and proportional references to fenland landscape to the north and east of the site and to links to the surrounding countryside.</p> <p><u>Historic England</u></p> <p>Disagree that this section needs to contain references to local character, distinctive vernacular and materials palette. This is essentially a descriptive part of the SPD examining the context of the area surrounding the new town. Such general design guidance is already provided for by Local Plan 2018 policy HQ1 'Design Principles' which addresses all of these matters.</p> <p>Agree that Figure 11 'Key Constraints' should refer to the Scheduled Monument deleting the word ancient. The listed gate piers are missing from Figure 11 and need to be added as Grade II gate piers.</p>
Proposed Modifications	<p>Amend Figure 11 as follows:</p> <ul style="list-style-type: none"> • Delete 'Scheduled ancient monuments' from the key and replace with 'Scheduled Monument'. • Add the Grade II listed gate piers to the map.

2.8 Constraints and Opportunities				
Representations Received	Support: 0	Object: 1	Comment: 0	Total: 1
Main Issues in reps 67379	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • What extent of land mass is contaminated particularly barracks land (see Inspectors notes). What will it cost to make safe and how might it affect viability? <p>Comment</p>			
Council's Assessment	<p>Policy SS/6 of the Local Plan 2018 at section 15 requires the developers to undertake site wide investigation and assessment of contamination to ensure the land is suitable for development and does not represent a risk to the environment. These are accordingly matters for consideration in regard to the planning applications for the development of the new town.</p>			
Proposed Modifications	<p>No modifications are proposed in response to representations on section 2.8 Constraints and Opportunities.</p>			

Section 3: Vision

3. Vision

Representations Received	Support: 1	Object: 3	Comment: 6	Total: 10
<p>Main Issues in reps</p> <p>67613 67559 67552 67621 67571 67596 67467 67279 67584 67491</p>	<p>Support</p> <ul style="list-style-type: none"> Support proposals, in particular possibility to create a substantial new living space in keeping with sustainability goals. Opportunity for using and extending best practice must be seized. Time of significant change in transport and energy technologies. Car ownership in decline, and electric and autonomous vehicle technology is suggesting a less passenger-car-centred future. <p>Object</p> <ul style="list-style-type: none"> Carbon Neutral Cambridge Vision is aligned with Policy SS/6 which specifies "will deliver an example of excellence in sustainable development and healthier living". Support this but object to SPD on grounds that it needs to demonstrate more ambition, particularly with regard to energy efficiency and decarbonisation, if it is to come close to delivering on either policy or vision. Support much of vision for "WELL CONNECTED - Easy to move around, in an environment where active travel and public transport are the norm" and "Walking and Cycling will be given priority", but SPD does not provide evidence to meet aspiration. Include segregated cycle routes along all roads and give cyclists priority through all junctions. <p>Comment</p> <ul style="list-style-type: none"> Historic England Welcome references to rich local heritage in aspirations, valuable historic setting and locally distinctive design which recognises and enhances the character of the area, and to existing features such as the causeways, Denny Abbey, Bannold Drove etc. Horningsea Parish Council Support objective for an integrated, cohesive development. Easy access routes to retail, schools, community facilities needed from outset. Housing, building density and population. Natural England Fully support vision and aspirations including creation of a sustainable, resilient and well connected development incorporating an enhanced ecological network, and multi functional green infrastructure network. SPD is missing a key objective for delivery of landscape scale environmental enhancement including net biodiversity gain. Support much of vision for "WELL CONNECTED - Easy to move around, in an environment where active travel and public transport are the norm" and "Walking and Cycling will be given priority", but SPD does not provide evidence to meet aspiration. Include segregated cycle routes along all roads and give cyclists priority through all junctions. 			
<p>Council's Assessment</p>	<p>Support welcomed.</p> <p><u>Carbon Neutral Cambridge</u></p>			

	<p>The vision is accepted as being well aligned with Local Plan 2018 policy SS/6. This is appropriate as it is not legally possible for an SPD to make new policy or to go significantly beyond the policy approach set out in the Local Plan 2018. A key reason for this is that SPD are not subject to the same process of public examination as a Local Plan and so have less ‘weight’ in planning decision making.</p> <p><u>Well-Connected</u></p> <p>Disagree that the SPD does not provide evidence to meet its high aspirations regarding cycling and walking. Guiding principle 3 on page 83 is all about creating a high quality environment for cycling serving the whole town and focussed on key destinations. To include:</p> <ul style="list-style-type: none"> • A dense network of routes which accommodate cycling for local and longer distance travel for a wide range of users at frequent intervals, is of a high standard and is direct; • Primary streets which include segregated cycle paths; • Permeable street and cycle networks which provide a choice of routes for cyclists; • Green corridors with shared cycle and foot paths; • Safe crossing points where cycle routes cross streets, which give priority to cyclists over cars; • Connections to the national cycle network and other strategic cycle routes beyond the site; • Secure and enclosed cycle parking at local centres (in particular at the new rail station), key destinations and facilities, as well more generally within the public realm and open spaces; and • Bike & Ride facilities at the railway station, with a high volume of secure parking. ‘Bike & Go’ hire facilities should be provided for visitors to the New Town. Spaces should be allowed for an associated cycle repair and sales centre at the relocated railway station cycle park. <p><u>Natural England</u></p> <p>The SPD cannot seek to deliver landscape scale environmental enhancements outside the boundary of the new town as no such requirement is included within Local Plan 2018 policy SS/6.</p> <p>The ‘net gains’ requirement is set out in the National Planning Policy Framework and does not need to be repeated in the Local Plan or in the SPD. Planning decisions are required by the NPPF to minimise impacts on and provide net gains for biodiversity.</p>
Proposed Modifications	No modifications are proposed in response to representations on section 3 Vision.

3.1 Overview				
Representations Received	Support: 0	Object: 1	Comment: 1	Total: 2

Main Issues in reps 67570 67339	Support Object <ul style="list-style-type: none"> • Cambridge Carbon Footprint Support vision of delivering "an example of excellence in sustainable development". Object on grounds that it will not deliver this, contrary to policies in Climate Act 2008, NPPF and Policy SS/6. SPD should require all new homes should be Net Zero carbon emissions by 2030. Smart energy systems, with significant quantities of renewables and storage should be mandatory. Decarbonisation targets should be regularly reviewed and increased, in line with government policy. Set firmer standards to mitigate overheating and flood risks. Comment <ul style="list-style-type: none"> • Vision should be as aspirational as possible outlining clearly and prescriptively how developer should undertake development in adherence to Council's vision. Document driven by developers rather than District Council. Vision in Section 3 is commendable, but proposals presented in the subsequent chapters do not support this vision.
Council's Assessment	The vision is well aligned with Local Plan 2018 policy SS/6. This is appropriate as it is not legally possible for an SPD to make new policy or to go significantly beyond the policy approach set out in the Local Plan 2018. A key reason for this is that SPD are not subject to the same process of public examination as a Local Plan and so have less 'weight' in planning decision making.
Proposed Modifications	No modifications are proposed in response to representations on section 3.1 Vision.

3.2 Strategic Development Objectives				
Representations Received	Support: 3	Object: 1	Comment: 1	Total: 5
Main Issues in reps 67329 67270 67560 67318 67411	Support <ul style="list-style-type: none"> • Cambridgeshire County Council Transport Assessment Team supports SPD. PROW team objects to SPD. Transport objectives and principles will have a significant role in shaping future development - strategic development objectives of section 3.2, which places strong emphasis on walking, cycling and public transport. • Cambridgeshire Police Support SPD's content. Important principle of designing out crime to promote community safety and reducing vulnerability to crime. Delivers significant reduction in crime and cost efficiency savings for range of stakeholders. • Support prioritisation of cycling to encourage modal shift. Will encourage shift to new modes particularly new residents. Likely new residents currently living in London will not own car and will be drawn to a community in which cycling and walking are easy and safe. 			

	<p>Object</p> <ul style="list-style-type: none"> • RLW Estates Largely endorse the vision. Objective 2 Sustainable Movement should refer more specifically to achieving a modal shift. Should be expressed in non-technical terms by reference to achieving "a significant and measurable shift to walking, cycling and public transport modes in preference to the use of private vehicles." <p>Comment</p> <ul style="list-style-type: none"> • Natural England Particularly support strategic objective 3: Access to Open Space and Natural Environment but should explore opportunities to enhance connectivity to wider rural area.
Council's Assessment	<p>Support welcomed.</p> <p>RLW Estates. The proposed change is considered to be unnecessary given that objective 2 already commits the development to achieving sustainable movement to, from and around the town.</p> <p>Natural England. The proposed change is considered to be unnecessary given that objective 3 already refers to development offering the chance for residents to experience nature as part of their daily lives.</p>
Proposed Modifications	No modifications are proposed in response to representations on section 3.2 Strategic Development Objectives.

Section 4: Spatial Framework

4. Spatial Framework				
Representations Received	Support: 0	Object: 2	Comment: 2	Total: 4
Main Issues in reps 67595 67553 67614 67572	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • Many elements will encourage development with high levels of car use, which does not support vision in Section 3, and directly puts at risk, and undermines, health and well-being of existing and new residents. <p>Comment</p> <ul style="list-style-type: none"> • Many elements will encourage development with high levels of car use and discourage cycling and walking, which does not support Vision. Comments to provide clarity and more definite outcomes: Strongly oppose: <ul style="list-style-type: none"> * Small car park at entrance of barracks. Only provide small number of disabled bays. * Separate access to station from village. Does not encourage active travel. * New school at A10 entrance to site. Encourages car trips to drop off children en-route to workplace. Children 			

	<p>exposed to air pollutants</p> <ul style="list-style-type: none"> * Primary movement network. Encourages car use. Brings external traffic through middle of site. Crossing busy roads discourages walking and cycling. Contrary to vision. Primary routes should circuit site. - Station traffic should be routed through new town. Rerouting traffic close to GP, School, and nursery increasing risk to people. New station will be more attractive (longer trains and larger car park). - Need to change mind-set so walking and cycling become the norm. Schools should be located away from primary and secondary roads with no parking zones around. - Support "potential for a future public transport only link" but needs to be more definite. - Clarity is needed in relation to the Bounds route. Missing information on keys to figures. Inconsistent whether there is a strategic walking and cycling route link to Chittering. - All new dwellings should be connected to new town road network. - All connections should be agreed within SPD - cycle and pedestrians should be afforded same importance as roads. - Land use budget for cycle and pedestrian infrastructure missing. - Sustainable modes of travel should be phased before first occupation. - Propose additional items for Table 8: <ul style="list-style-type: none"> * safe and secure cycle parking per dwelling & retail, school, community premises * segregated vehicle / cycle / pedestrian routes * strategic cycle / walking connections
<p>Council's Assessment</p>	<p><u>Spatial framework will encourage a high level of car use</u></p> <p>The SPD sets out key access and movement principles, alongside a package of critical transport infrastructure, to support a shift from reliance upon the private car to more sustainable transport methods and choices for both internal and external journeys. As the new town will be developed over a relatively long period of time of at least 25 years, it will be expected to be able to respond to the inevitable technological change that will take place over that time.</p> <p><u>Various comments</u></p> <p>The small car park at the Barracks entrance is intended to avoid longer car journeys via the A10.</p> <p>The new Station has recently received planning permission.</p> <p>The table of physical and social infrastructure at page 119 includes Chittering in the places to be linked by a comprehensive network of high quality cycle routes.</p> <p>The SPD provides an appropriate level of detail in regards to the</p>

'Bounds' route.

The phasing of the provision of social and physical infrastructure will be informed by the Transport Assessment process and secured by s106 planning obligation agreements.

The proposed additional items for table 8 are unnecessary being addressed elsewhere in the SPD or by the Local Plan 2018 (for example in regard to cycle parking standards).

Disagree that the proposed primary movement network will encourage additional car use beyond that which what would be generated by a perimeter ring road. At page 82 the SPD states that a fundamental principle of the new town will be to prioritise sustainable movement across the new town, making such modes more convenient than car travel. It will aim to prioritise walking and cycling as the preferred travel mode for local trips within the New Town, with attractive cycling access provided for longer trips, especially between Waterbeach and Cambridge. Traffic speeds will be controlled within the urban area and the needs of cyclists and pedestrians for safe, direct and pleasant crossings secured through the detailed planning control process. At page 82 the SPD references for development to deliver frequent pedestrian crossings at grade - both formal and informal, with priority given to pedestrians at points where pedestrian routes cross main streets.

Air quality

The SPD requires that facilities used by sensitive members of the population e.g. the elderly and schoolchildren, are located in a way which reduces exposure to pollution sources including to small airborne particles known to be a health risk. Specifically it states that such uses should avoid locations near to the A10 to the west of the site and rail line to the east (page 111). The SPD includes criteria for school locations which make specific reference to health, environmental and safety risks at page 43. It follows that the school 'locations' shown on Figure 17 at page 42 of the SPD and on the Spatial Framework Diagram are indicative general locations and not site allocations.

The acceptability of actual school locations in terms of air quality is assessed at the planning application stage through the Environmental Impact Assessment process and detailed air quality assessments.

Concerns have been raised about the location of the two schools located closest to the west of the site in terms of air quality both in regard to this SPD and in regard to the planning application from Urban and Civic for the west of the site. A technical note on air quality has been provided by the applicant in relation to the north-western primary school location. Whilst primarily of relevance for the consideration of that planning application it is also material to the Waterbeach New Town SPD. The technical note summarises the predicted air quality impacts at the boundary of the school site, closest to the A10. It provides

	<p>modelled effects and takes account of a dualled A10 scenario. The assessment demonstrates that air quality concentrations at the school boundary will be well within both UK objectives and WHO (World Health Organisation) guideline values for NO₂ (Nitrous oxide), and for coarse and fine particulate matter (PM₁₀, and PM_{2.5} particles) which are significantly stricter than UK national air quality objectives. The technical note finds that the vast majority of the PM_{2.5} concentrations at the school boundary come from background levels and not from the A10, so much so that the relocation of the school towards the centre of the new town would not significantly change concentration levels.</p> <p>It can be noted in regard to air quality that Local Plan policy SC/12 'Air Quality' requires developments to comply with the most up to date national guidance on air quality. The draft UK Air Quality Strategy published for consultation in 2018 included an aim at working towards the WHO guideline value for PM_{2.5} particles which indicates a likely direction of travel for national guidance on air quality.</p> <p>It follows that the indicative school locations shown in the SPD would appear to be consistent with Local Plan policy SC/12 and also to be acceptable if in future national guidance on air quality were to be changed to follow the WHO guideline values.</p>
Proposed Modifications	No modifications are proposed in response to representations on section 4 Towards a Spatial Framework.

4.2 Key Structural Elements (fixes)				
Representations Received	Support:8	Object: 63	Comment: 38	Total: 109
Main Issues in reps	Support			
67452	<u>Transport</u>			
67334	<ul style="list-style-type: none"> • Cambridgeshire County Council Support transport objectives and principles with strong emphasis on walking, cycling and public transport, and strategic solutions and key infrastructure which will be required to be delivered in timely manner. 			
67307	<ul style="list-style-type: none"> • Table 8 - key aspect of transport infrastructure is relocated railway station and associated access road. Should come forward early, with trigger set by Transport Assessments submitted with both applications. 			
67600	<ul style="list-style-type: none"> • SPD highlights key findings of the Ely to Cambridge Study strand 2 report and makes clear the full development is critically dependent on strategic solutions. 			
67445	<ul style="list-style-type: none"> • Key infrastructure required is set out in Infrastructure and Delivery Plan in section 6. Will form the basis of heads of terms for S106 agreements for each outline application. 			
67425	<u>Denny Abbey setting</u>			
67476	<ul style="list-style-type: none"> • Cambridge Past Present and Future Welcome safeguarding measures for Denny Abbey. 			
67481	<ul style="list-style-type: none"> • RLW Estates support principles set out for this structural 			
67506				
67361				
67535				
67631				
67539				
67468				
67348				
67289				
67323				
67277				
67464				
67276				
67499				

67544	element.
67422	
67395	<u>Education</u>
67607	<ul style="list-style-type: none"> • Cambridgeshire County Council Support allocation of 5 primary & 2 secondary schools and requirement for early delivery of primary places. Agree with general location having regard to housing areas and movement network to achieve safe & Sustainable access. Final locations to be determined through outline planning applications in conjunction with further work on flood risk. Needs flexibility regarding release of reserve land for future expansion should additional capacity be needed. Land reserved for SEN and 6th form facility, and need contributions towards costs of provision. Will form part of the education review mechanism.
67608	
67424	
67443	
67529	
67589	
67337	
67574	
67623	
67503	
67611	
67421	
67302	
67561	<u>Primary movement access</u>
67418	<ul style="list-style-type: none"> • National Trust Support inclusion of the 'missing link', which would connect Waterbeach to Wicken. The Trust is supportive subject to being satisfied that measures are in place to protect ecologically sensitive parts of Wicken Fen reserve.
67556	
67419	
67480	
67634	
67442	
67420	<u>Public spaces</u>
67594	<ul style="list-style-type: none"> • National Trust Support: Green infrastructure; delivery of high quality multifunctional green spaces and wider connectivity. • RWL Estates Support classification and characterisation of 6 areas of open space in this section. Welcome change in shape of Snakes Pit. Agree with potential to connect Winfold Common with Station Approach Park.
67615	
67622	
67573	
67568	
67313	
67604	
67510	
67415	
67392	Object
67483	<u>Amount, density and heights</u>
67509	<ul style="list-style-type: none"> • Cambridge Cycle Campaign Table 7 must include entries for footpaths and cycle routes that are separate from streets, using ample and flexible widths for rights-of-way that include sufficient space for good verges, proper landscaping, and important safety measures such as visibility splays on either side of cycle routes. • Defence Infrastructure Organisation and Urban & Civic Figure 30 is indicative but difficult to interpret and potentially misleading. Both low and medium 'density' areas are labelled 2-3 storeys. Gives impression of predominance of 2 to 3 storey buildings. Barracks & Airfield Outline Planning Application (B&A OPA) demonstrated large part of site can accommodate buildings up to four and sometimes six storeys. No indication of scope for variety of building heights. Use of 'range' implies minimum and maximum, yet narrow and not indicative of what is possible. Three locations, not two, where tall buildings identified as acceptable; town centre, station and lake. • RLW Estates Demonstrates potential for 11,000 homes.
67502	
67477	
67319	
67586	
67610	
67444	
67293	
67297	
67299	
67566	
67391	
67624	
67602	
67580	
67393	
67616	
67575	
67583	
67533	

<p>67414 67549 67630 67295 67519 67545 67536 67423 67394 67453 67587 67435 67301 67482 67417 67413 67365 67493 67426 67588 67441 67601 67446 67447 67390 67427 67416 67513 67412 67492 67494</p>	<p>Unclear why capacity is 'fixed' as no definitive conclusions - better within "Guiding Principles". Not necessary or appropriate to state that development at Abbey Place interface should be similar to existing dwellings. Plan on page 69 needs to show potential for limited number of taller buildings (up to 5 storeys) in all locations except visually sensitive edges. Height should not be limited and 'fixed' unless tested in more detail with clear rationale. Reference to form and grain of buildings should not be fixed' as this is 'guidance' which will be subject to further design and testing. Eastern part of site are shown at lowest density. Most accessible to station and should have densities as high as close to the A10 and town centre.</p> <ul style="list-style-type: none"> • Waterbeach Parish Council <u>Scale and Massing</u> - Number should be guided by Local Plan policy. References to 10,000 and 11,000 dwellings should be removed. High density not compatible around proposed rail station. <u>Height</u> - 7-8 storeys do not reflect tradition of other fen edge market towns. Should be limited to 4 storeys, with 2 around village. <u>Public spaces</u> - should not be partially used as SUDS. <u>Primary Movement</u> - object to Cody Road as route to station, should be access from A10. • Density and height must be 40dph in order to conform to Local Plan and meet target of 8,000 to 9,000, homes. Concerned number of dwellings SPD seems to support and numbers developer led (11,000) rather than as a district requirement supported by Policy SS/5. Policy states to draw on traditions of Fen Edge Market Towns. Not aware any have 8 story buildings. • Heights up to thirty-metre (proposed by both developers) cannot be mitigated in low-lying fens. Sightlines do not reflect topography of land to East, North and South of site and should be revised. Urban design and building heights will permanently change and interrupt characteristic long views, big skies and tranquillity of fens. SPD must contain height restrictions that reflect surrounding existing architecture and protect views from/to Denny Abbey. Without this SPD not fit for purpose in directing development north of Waterbeach. • SPD is non-specific enough about limits of housing numbers Housing available would be attractive to new employees at distant employment sites resulting in increased travel. Large amount of high-rise buildings will be necessary to facilitate delivery of 6,500 homes. Unacceptable as it is out of character for area, totally at odds with nearby settlements. Height of lakeside buildings (up to six storeys with some eight/ 30m) not in keeping with surrounding area, conservation area and vernacular of Waterbeach village, listed buildings of Landbeach or historic buildings of Denny Abbey. • 11,000 homes is NOT appropriate, current village and surrounding infrastructure will not cope with that many.
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- Concerned about increase in number of dwellings from 8,000 originally planned to applications for 11,000, and density. Density means insufficient space for landscaping and open space. Limit to 8,000 dwellings.
- Dwellings must be limited to 9,000 or less. Market town approach 4 story dwellings max.
- Density of development: number of buildings completely inappropriate to rural area, as are 6-8 storey buildings. Whole character of existing village and local area will be irreparably damaged. High-rise has no place here.

Denny Abbey setting

- **The Farmland Museum and Denny Abbey** Important role in New Town but need investment to develop its full potential. Not fully reflected in SPD. Opening Causeway route welcomed, enabling many more people to visit without needing to use car. Easier access means security will need considerable improvement. Potential as unique community asset not fully reflected. Little mention of small well with 'Spring up O well' inscribed on stone surround towards north of site. Should be retained as a lasting reminder that agricultural history is much longer than 70 or so years of military use.

Edge treatments

- **RLW Estates** Support principles set out for central land ownership boundary although some variations in character and appearance of built form must be acceptable across site including at landownership boundaries. Not clear how principles for central ownership boundary are to be implemented. Strongly support statement regarding comprehensive development. Would be helpful if development boundary in north east could be amended to match open space plan. Unclear what is meant by opportunity for creation of green ways in south east corner. Relationship to existing village: appears to be little open space or demarcation in areas adjacent to village.

Education

- **Cambridge Cycle Campaign** Instead of being near roads, primary schools should be near safe, off-road walking and cycling routes and provided with a large amount of cycle parking, and only blue badge car parking.
- **Cambridge without Incineration** Proximity of school to A10 is likely to subject pupils and staff to high levels of pollution with implications for future illness.
- **Defence Infrastructure Organisation and Urban & Civic** Section opens with statement that is definitive in terms of what will 'be required' in terms of education provision. Does not reflect approach, now agreed with County Council, to maintain degree of flexibility to deliver in response to actual need, managed through Education Review Group. Table 1 - summary reflective of flexible

position but introduces different locational criteria (walking catchments) from those listed on preceding page - should be consistent.

- **RLW Estates** Inconsistent in size requirement of primary schools. Concerned with central location of secondary school. Should be south west of town centre. Insufficient justification in SPD to consider this 'fixed' element.
- **Waterbeach Parish Council.** Primary School and Special Needs School should not be near A10 due to impact on health from airborne pollutants.

Community facilities

- Lack of detail on provision for arts. Creative Industries, which include the arts, are of growing importance in UK economy and can play an important part in helping to create vibrant and cohesive communities. Waterbeach has lively arts community. Important to include dedicated venue for arts to include live events, concerts and theatre as well as dedicated exhibition space. Consider how to embed arts throughout town through commissioned works and events that interpret site and its fenland setting.

Greenways and corridors

- **RLW Estates** Greenways and links across land ownership boundaries are potentially constrained by ransom position. Role and importance of east - west corridors is supported. Figure 24 could be of greater assistance in addressing practicalities of delivering east - west links across site. Specific changes are proposed. Fen Edge / rail corridor should not extend as far south as shown. WNTS proposal is not able to deliver a green set back in this location due to station facilities and infrastructure. Access Movement and Connectivity Plan - section of Secondary Road in north east is incorrectly shown as Principal Greenway. Suggest greenways be shown in a different colour to make plan clearer.
- **RLW Estates** Would be helpful to add a section on equestrian access with reference to potential for circular routes and links into wider network.
- **Waterbeach and District Bridleways Group** Object to shared pedestrian / cycle routes in non-vehicular areas and green parks. All routes traversing development and linking communities need to be multiuser routes.
- SPD premature in absence of coordinated approach for whole development site across both land ownerships. SPD must agree first:
 - Retention of woodland west of lake
 - Safeguarding land for special school
 - Revision of primary school and special school locations away from A10 and areas of high air pollution
 - Impacts to Wicken Fen
 - Ecological assessments (bat, hedgehog, birds and hedgerows)

- Revised flood and drainage risk assessments
- Update of green infrastructure - much need for biodiversity given houses built in last few years on greenfield.

Collaborative work with wildlife organisations and National Trust to ensure biodiversity maximised.

The Causeway link

- **RLW Estates** Support principle of causeway link but it crosses land ownership boundaries. Delivery is therefore constrained if principle of attaching a ransom or other market value is allowed.

Hierarchy of Centres

- **Defence Infrastructure Organisation and Urban & Civic** Co-location of primary schools and local centres should be expressed as a principle that is desirable, subject to consideration of all other design matters and impacts.
- **RLW Estates** Agree with definition of town centre as main focus for town and description and broad location of three local centres. Sixth Form College should be in Figure 15 for consistency. Open space including outdoor sports and community growing space could be included in list of co-located facilities at Bannold Drove Centre. Library could be included in list of co-located facilities at Town Centre. Description of Station District should include sixth form college, open space and outdoor sports facilities. Bannold Drove centre text includes a description of relationship and proximity to the sports hub, community growing space and Fenland Parks.
- Do not support car park located at existing entrance to barracks as encourages residents to drive, increasing traffic and making the roads more hostile to pedestrians and cyclists. Separate access to railway station from village does not encourage active travel. All traffic to station should be routed via new town. Station Road will become 'rat run' and on-street parking should be retained and enhanced to act as a traffic calming measure.
- One aspect of People First Vision I do not share is plan for 'an opportunity to create a heart to the new town' at existing entrance to barracks at east end of Denny End Rd. Current levels of traffic are high when approaching that area from both sides. Fact it is a road for vehicles will only make people drive more to access new town rather than just making it accessible by non-vehicle means.
- Station District" - Facilities to serve town will not need heavy rail links; it would be better to locate them more centrally. Moving station from current location close to housing to one where everyone must walk past shops, offices, schools, cinemas, etc to get to it seems crazy.

Wider impacts on villages

- It does not seem that SPD has accurately considered

impact of development on residents of Waterbeach and Chittering. Attaching very urban development to rural village with almost no transition zone. Height and density of buildings especially near existing village and interface with village, indeed spatial arrangement of masterplan and relationship to Waterbeach village does not meet needs of current Waterbeach residents.

Non-vehicular access route provision

- Object to use the existing Bannolds Road Byway as 'an important route' whilst all proposals for improved access / connectivity are for cyclists and pedestrians. No reference or consideration is given to horse riders. No plans put in place to provide alternative access and equally commodious facilities for horse riders. Unacceptable. A list of references are provided where equestrian needs have not been addressed.

Infrastructure provision

- Policy SS/6 does not envisage any infrastructure necessary for settlement being outside SS/6 area, yet developers are now apparently allowed to locate many facilities off site.

Primary movement access

- **Waterbeach / Cambridge Cycle Campaign** Street network provides direct routes for car travel, which means cars will become preferred mode of transport. Instead, ensure car trips go out and around edge of development. Walking and cycling routes for local trips should always be shorter and more convenient than equivalent by car. 'Primary movement and access' must describe how active travel and public transport will be designed and given priority before describing private car access. 'Strategic walking and cycling connections' text should say developers will deliver each of listed points as a Fix, plus additional points regarding design. Modify statement to add 'direct, safe, continuous, attractive and with elements that design-out crime, enhance personal security such as strong natural surveillance, nearby active uses and buildings that face the route.' Explicitly specify that developments must follow guidance specified in Cambridge Cycle Parking Guide. Car parks induce traffic, do not build car parks with access from village. Instead, focus on creating highly attractive sustainable travel option. Modify text to say 'cycle routes will have segregated cycleways with separate footways, with ample verges on either side to support tree planting and visibility plays in an environment that feels safe'
- **Defence Infrastructure Organisation and Urban & Civic** Plans and text relating to hierarchy of routes and movement would benefit from further explanation of what is meant by primary and secondary routes, and how these relate to both mode and needs of anticipated,

resident population.

- **National Trust:** Proposals for cycling and pedestrian movement omit reference to:
 - pedestrian and cycle links north to north and east, including Fen Rivers Way;
 - and Lodes Way (National Cycle Route 11).
- **RLW Estates** "Primary Movement" seems contradictory. States that high street will need to limit vehicle access but is Primary Route. Clarification required as to how these two priorities are reconciled given that primary movement is one of "fixes".
- **Swavesey and District Bridleways Group** Waterbeach is rural area with many other Public Bridleways and Public Byways in vicinity, all of which could be joined into a cohesive network with appropriate consideration from authorities concerned.
- **Waterbeach and District Bridleways Group** Object to obstruction by default of intense buildings and vehicular traffic, of ancient and important equestrian access route at Bannold and Cross Drove.
- Although two access points onto A10 are described, southern point is not known. More detail needed to assess effect of increased vehicular use of A10, A14 interchange at Milton and access to Cambridge or likelihood of traffic diverting through secondary roads such as B1047 to reach east Cambridge and ring road, Landbeach Road and Ely Road, Milton and knock on effects at Horningsea too. Entry and exit to private vehicles should only be from DUALLED A10. Currently risk of making rat-runs - additional physical measures are required at Clayhithe and Horningsea and within Waterbeach to prevent access onto B1047. Public transport route not described and funding not guaranteed.
- Main roads running through the middle of development, and a cycleway round outside will make it easier for short journeys within town to be by car, and make journeys through town by foot or cycle less pleasant. Instead, should be a perimeter road (like Bar Hill) and access by car should be from perimeter road. If cars have to go via perimeter road while cycles can go direct, that will encourage more healthy and less polluting mode. Circular walk around town, while laudable, is less important than moving motor traffic out to perimeter. Development is planned to stretch well into 2030s. New transport technologies being trialled in UK, should be considered.
- SPD degrades village and in particular will negatively impact health, safety and way of life for residents of Station Road. Two key concerns are: (1) increased volumes of traffic on narrow road not suited for through traffic (2) significant increase in time to access rail links. SPD must be enhanced to explicitly state that (1) through traffic on Station Road will see no increase, and be actively reduced (2) track parallel pedestrian and cycle path must be provided to minimize risk and time for

accessing new station.

- Vehicular access to New Town (cycles/pedestrians/buses are accepted) would mean village becomes rat run for traffic heading for Horningsea and Cambridge west with all associated problems that would create. Appears to be suggestion that some of high density housing near new station would have vehicular access through village. Is this correct? How many houses?
- Walking and cycling and public transport should be given priority with on-site and off site provision. New transport links to Cambridge should preserve existing greenways. Proposed metro should be separate from these.

Public spaces

- More open space nearer existing village. Yes, we were promised Bannold Road wouldn't be built on and look what's happening!

Public transport

- **RLW Estates** Necessary to make reference to importance of public transport movements in both directions across principal land ownership boundary as "Primary Movement and Access" requirement. Constraints on delivering this need to be acknowledged and addressed. Support requirement to safeguard land for access to station from A10, village and other parts of new town by all modes of transport but safeguarding land is not sufficient to ensure it is delivered. SPD must include enabling actions and requirements to ensure access is achieved.
- Against relocation of train station as it would leave existing village with little public transport as bus service is inadequate and expensive. If new station was built for new town this shouldn't be a) until significant number of houses have been built and walking/cycling routes are in place and b) in addition to existing station.
- Does not seem to be analysis of where residents will be travelling to. Running train from Ely to Cambridge in order to carry people from Waterbeach to Cambridge North as part of their journey from new town to Science Park (for instance) would not be efficient. Better to support one of metro systems being proposed for City and connect new town to that. Level crossings in area should be re-examined.
- Until the outcome of A10 Corridor study is known, viability of proposed transport mitigation cannot be assessed. If mitigation is delayed until 1,400 dwellings have been occupied any construction traffic needed to change the A10 will add to congestion.

Delivery of fixes

- **RLW Estates** Key structuring elements or fixes 3, 4, 7 and 9 are subject to potential ransom positions. Significant constraint on delivery of core requirements.

Considerable doubt as to whether "fixes" can be delivered unless and until SPD acts specifically and directly to neutralise all potential ransom positions applying to movement across land ownership boundaries. Issue affects Primary Movement corridor and improved or new footpaths / cycleways between New Town and village. Mass transit route may not be necessary in light of considerable modal shift potential of re-located station and provision for cycling and pedestrian links. Principle of mass transit route requires further consideration and should not be specified as "key structuring element" or "fix".

Comment

Amount, density and heights

- **Cambridge Past Present and Future** Clarity is required about total number of homes. SPD states a range, which is vague and could be challenged. Firm commitment to percentage of affordable dwellings should be included.
- **Horningsea Parish Council** * Difference between planning applications (11,000 dwellings / 30,800 residents) and Policy SS/6 (8-9,000 dwellings / 25,200 population). SPD needs to specify numbers, density and ensure infrastructure provision reflects actual numbers permitted and includes triggers for delivery. Building heights of 6 / 8 storeys are inappropriate for Fenland setting. More detail needed on location of emergency services. Welcome 40% affordable housing - should be delivered early. Ensure sufficient community space, not reliant on schools. Triggers for schools need to bear in mind existing schools are over subscribed. Eight storey block at close to station could lead to lack of contact with central town facilities and social isolation.
- Too much for a Fen edge town. Developers should bring their numbers back down to 8,000 - 9,000.
- Height is not in keeping with fen edge location and should be reduced to 1-2 storey in most areas with some 2 -3 and a small amount of 3-4 in built up areas perhaps with a couple of 6 storey buildings. Number of dwellings proposed should be reduced to reflect this.
- Reduce number of dwellings in order to get housing density right and provide necessary buffer between new settlement and Denny Abbey. (Open space around Denny Abbey counts towards provision, so remainder of site is lacking open space - should not feel further overcrowded by increasing housing density.)
- Height of housing and urban style not in keeping with fen edge location and neighbouring settlements.
- Existing Waterbeach Community is likely to integrate better with the new community if it feels it's own identity is not under threat. Provide clearer physical green space divide along southern boundary. Will strengthen bounds circular amenity route.

- Give it its own name and stop calling it 'Waterbeach new town'. Town and village should be able to function independently and sit happily side by side.
- A massive 11,000 homes initially, not appropriate. Building heights up to 6-8 storeys, totally out of character. Hope original trees survive to screen ugly town.
- 11,000 houses is too many for this site six and eight stories high is too much for a Fenland town.

Housing, building density and population

- **Horningsea Parish Council** Planning applications total of 11,000, an estimated population of 30,800. Policy SS/6 & SPD specify total number of houses as 8- 9,000, estimated population of 25,200. Infrastructure, number of schools and employment opportunities, as well as s106 contributions, will be significantly different. Difference in blanket residential density, 51 for 11,000 dwellings and 40 for 9,000 dwellings significant. SPD needs to specify total number of dwellings planned, commensurate density and associated infrastructure. SPD acknowledges that planning applications provide 11,000 dwellings, but makes no comment on suitability and explores land use requirements by housing type and density for different total numbers. Can't be left until tested at specific proposals - provision of spatial framework, leisure facilities, transport corridors, access, retail, water and waste management, health and parking depends on eventual totals. Triggers for secondary school provision, traffic mitigation and public transport should be set by staged completion of eventual total number of dwellings. More detail needed on location of emergency services to give easy access to residents. Welcome 40% affordable housing. Request early timeline for provision of affordable housing, including social housing, for key workers.

Schools and Community Facilities

- **Cambridgeshire County Council** Additional references should be made with regards to locating primary schools away from primary streets, and areas with higher air and noise pollution, but still with vehicle access for teaching staff. Reference should be made to need for location of bicycle parking close to dwellings which is easy to use to encourage the use of bicycles rather than vehicles.
- **Horningsea Parish Council** Provision of community spaces and facilities appears reasonable but includes reliance on use of school facilities for some community use. Cannot be forced to make their facilities available for community use such as meeting spaces. SPD must not cut down on providing community spaces by relying on schools. Secondary school children may arrive before trigger. Bottisham and Cottenham Village Colleges already oversubscribed. Suggest trigger for secondary school provision should be 500 two- and three-bedroomed dwellings.

	<ul style="list-style-type: none"> • Choices are available for primary school without need to travel. Could choices be assured at secondary level perhaps free school, religious ties or private education. Significant numbers do not get first choice. Several oversubscribed schools. Building schools earlier would be of benefit to new town and neighbouring communities. (Please explain: If 9,000 homes estimated to give 15 forms of secondary school entry and there are additional 3 forms expected from existing village why only 2 x 8 form entry planned?) Provide at least one 11-18 institution for maintaining continuity on transition to further education rather than having to change establishments. • Strongly oppose school located at A10 due to encouraging car use and air quality issues. Schools need to be located away from primary street network with 'No parking' zone around them. Criteria for future location and design of schools includes "proximity to primary and secondary road network" - unacceptable criterion for active travel. Figure 17 key - unclear what pink lines representing. • Schools are to be placed near roads - wrongly encouraging car use for an activity which contributes hugely to congestion and pollution. • Limited mention of arts and cultural facilities. Don't explore possibilities and opportunities detailed arts policy can offer, both within establishment of new communities and enriching quality of life there-after. Waterbeach has diverse artistic community who through organising concerts, exhibition, film screenings and talks have realised local demand that can only grow. • Lack of detail on provision for arts. Creative Industries, which include the arts, are of growing importance in UK economy and can play an important part in helping to create vibrant and cohesive communities. Waterbeach has lively arts community. Section 106 funding is available. Important to include dedicated venue for arts to include live events, concerts and theatre as well as dedicated exhibition space. Consider how to embed arts throughout town through commissioned works and events that interpret site and its fenland setting. <p><u>Tourism</u></p> <ul style="list-style-type: none"> • Tourism could have a positive effect on local economy. Is there scope to promote visitors/ecotourism to Fen by providing camping or similar on eastern outskirts? <p><u>Railway Station</u></p> <ul style="list-style-type: none"> • For existing station users outside of Waterbeach village, primary access should be via the new town with secondary access primarily for existing village residents only to avoid additional traffic on Bannold Road. <p><u>Car parking</u></p> <ul style="list-style-type: none"> • Design should encourage people who have chosen to
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drive to find safe place to park and then walk short distance to destination rather than parking as close as possible and using hazard warning lights if it is not a safe place!

Cycleways & Footpaths

- To improve safety for all, cyclists should have own cycleway which does not share roads or footpaths but has it's own distinctive design and runs alongside roads and footpaths. Perhaps similar to Dutch model.
- Refuse collection plan that does not require bins to be put out on path & developing roads where it difficult to mount kerb and park across pavement would be of benefit to pedestrians and help those with push chairs and mobility scooters to use footpaths more easily

Greenways and corridors

- **Natural England** Generally support promotion of strategic walking and cycling connections and public informal open spaces connected by greenways and corridors. Figures 23, 24, and 27 should indicate connectivity to off-site open spaces including the river and the Cam Washes and Wicken Fen. Should explore opportunities to enhance connectivity to wider rural area.
- **Wildlife Trust** satisfied with overall approach to design of green infrastructure network and locations of major greenways. Highlight importance of east-west corridors as connections between other areas of green infrastructure, as noted in point 6. Pleased to see consideration has been given to provision of circular and well-connected leisure routes within development. Table 8 should include reference to the proposed Landscape and Ecological Management Plan (LEMP).
- Many people chosen to live here because of ease of access to local countryside. Suggest should be provision for pedestrian and cycle access from new town to river Cam and countryside on eastern side of Cam. Currently, access via Bottisham Lock but significant distance to walk for new residents and could also become a pinch-point.

Edge treatments

- **National Trust** Principle 7 Greenways and Corridors should consider specific enhancement opportunities, and articulate a long term vision for enhancing Fen Edge and Rail corridor.
- More green space should be provided at southern end of new town to ensure existing village continues to benefit from fen edge landscape.

Hierarchy of Centres

- Do not support car park located at existing entrance to barracks as encourages residents to drive, increasing traffic and making the roads more hostile to pedestrians and cyclists. Separate access to railway station from

village does not encourage active travel. All traffic to station should be routed via new town. Station Road will become 'rat run' and on-street parking should be retained and enhanced on to act as a traffic calming measure.

- Station district - do not support high height for this district. adjacent to fenland location so keep housing to low-rise and light pollution to the minimum required.

Primary movement and access

- **Cambridgeshire County Council** Would support approach that removes cars from town centre. Primary streets will be key movement corridors for walking, cycling, vehicles and buses around town and designed to accommodate these modes appropriately. Walking and cycling should be encouraged through availability and design of cross town cycle routes, which link all parts of town, particularly railway station. Figure 19 should be strengthened to enable cross town cycle and pedestrian movements over and above cross town vehicle movements. Potential for perimeter vehicle route around town, with each residential area to be self contained and only accessible by vehicle from perimeter road. Potential to favour cross town walking and cycling links by limiting cross town vehicle movements between residential areas. Similar to Cambridge Core Traffic Scheme which limits ability for cross town vehicle movement. Layout and primary road plan should be amended to allow for perimeter road, and with secondary roads serving self contained residential areas only.
- No need for town centre car parking as it will encourage car use; Access to station should be from A10 not Cody Road; Conflict between main routes through town and functionality of town, which should be kept free of traffic and air quality impacts; Support northern park and ride to relieve A10 to south and for visitors to town / station. No need for park and ride at station; Welcome Causeway link - historic and creates symbolic and actual link between village and new community.
- Fundamentally, no clear vision to truly embrace this new town as an opportunity for developing a sustainable modern town with excellent public transport infrastructure. Traffic to new station is routed through old village, past primary school, GP surgery, and nursery.
- Primary movement network shows highly interconnected road network for cars, with routes bisecting new town. Encourages car use for journeys within development, with direct routes between destinations. Will bring external traffic through middle of development. Primary routes should be taken around edge, with radial connections linking sectors of development. Connections through middle of site should be limited to pedestrians, cyclists and public transport. All pedestrian and cycle routes should be designed with strong natural surveillance to bolster personal security". Need strategic walking and

cycling route to Chittering. Object to dwellings using new vehicular access road serving relocated station. Cycle and pedestrian routes must be afforded same importance as primary/secondary road links. Land use budget does not include land for pedestrian/cycle paths off road. Important that connections across land ownership for cycle and pedestrian routes are agreed within SPD. Sustainable modes of travel should be phased before first occupation. WCC propose additional items to be added to Table 8.

- Segregated access to village utilizing Cody Road should not be accessible from new development by private vehicle, to avoid it becoming rat run. Taxi and bus and emergency services may have access. Car parking from new development should be limited with ample cycle parking and linking bus routes to facilitate public transport. Primary movement should not have linked secondary routes, to ensure that only primary route/loop are favoured for cars. Similar to Milton with linking road and multiple cul-de-sac from this into housing area. Linking foot and cycle paths then become preferential means of movement within development. Cycle routes should be committed to being high quality with ample width - 3m wide hard smooth surfaces.
- New station needs direct access from A10 to get people to switch to train. Train platform will need to be able to accommodate 12 carriage trains.
- Car park for people from Waterbeach to get into new city is ridiculous because it forces people to use cars instead of well connected cycling paths. Safe spaces to lock bikes should be provided in public spaces, next to shops and train station (e.g. Cambridge bike parking next to station).
- Do not agree with old part of village being used as a cut through by even more traffic. Construction traffic shouldn't go through old village.

Public spaces

- **Cambridge Past Present and Future** More detail required about how biodiversity and green infrastructure needs between two sites and across and up through to river valley will be safeguarded. Natural Cambridgeshire recently produced Tool Kit for developers to ensure their sites demonstrate their commitment to achieving a net biodiversity gain. Recommend both developers refer to it.
- **Wildlife Trust** Potential benefit which could be referred to here is opportunity to provide attractive high quality greenspaces within development which could help to reduce scale of potential recreational impacts on Wicken Fen.

Public transport

- **Cambridgeshire County Council** Figure 20 shows key public transport framework for town including relocated railway station, park and ride locations, bus friendly

	<p>routes, and key public transport connections from town to surrounding area. Shows potential public transport only link between railway station, through town centre and towards Cambridge, and safeguards second public transport route between Waterbeach village and Cambridge Research Park.</p> <ul style="list-style-type: none"> • Majority want station to remain in the same location but upgraded. Inevitability about the move - so why is there not going to be direct footpath/cycle way alongside railway linking 2 sites? If it has to move why can't it be delayed until there are communities built close to it?
<p>Council's Assessment</p>	<p>Welcome support.</p> <p><u>Amount, density and heights / wider impacts on villages</u></p> <p>Local Plan 2018 policy SS/6 states that the new town will provide approximately 8,000-9,000 dwellings with the final capacity to be determined through a design-led approach and spatial framework diagram having regard to the quantum, location and distribution of development and maintaining an appropriate setting for Denny Abbey. The SPD at page 66 is clear that it does not endorse a particular dwelling capacity figure. What it does is to consider the implications of a range of levels of housing development in terms of their infrastructure requirements and dwelling mix to inform decisions on planning applications, being mindful that there are live applications that would result in a higher number of dwellings and so that the infrastructure implications of different levels of development is clear to help inform the decision making process. The SPD demonstrates at Table 2 that over such a large site relatively small changes in density assumptions can generate different amounts of housing and over a 25 year plus build out period it can be expected that best urban design practice will continue to evolve as will the demand for different dwelling types and sizes all of which will affect site capacity and urban form. Furthermore the National Planning Policy Framework requires the efficient use of land and states that residential development densities should be significantly uplifted in areas that are (or will be) well served by public transport.</p> <p>Disagree that it is necessary to include a specific allowance in the land use budget Table 7 for public rights of way and cycle routes as there is ample flexibility built into the land use budget for these and other land uses that are not specifically referenced.</p> <p>Disagree that it is necessary to show the medium density areas as 2-5 storeys in height because the heights are listed as indicative so allowing for some flexibility, and because it is possible to achieve a wide range of densities within the 2-3 storey limitation depending on the mix of house types and the size of gardens.</p> <p>In regard to the height of buildings, the SPD states at page 68 that building scale and massing in the new town should respect and respond to the character of the surrounding area whilst also recognising that when developing a new town it will be appropriate to create a denser urban character in appropriate locations, such as the town centre and railway station. It would not however be appropriate to allow for taller buildings in all locations except the settlement edges. Density and building height must be related to relative accessibility and urban design best practice so that densities and building heights should be higher in the town centre, around the station and around the Lake. Disagree that the eastern part of the site should have a higher blanket</p>

density away from the station and town centre. The higher density around the station accords with NPPF policy to concentrate development in the most sustainable locations.

Local Plan 2018 policy SS/6 refers to the new town being a place with its own distinctive local identity founded on best practice urban design principles, drawing on the traditions of fen-edge market towns. The proposed densities and buildings heights are considered to be consistent with this policy approach. The importance of providing an appropriate setting for Denny Abbey was considered through the examination of the Local Plan and the northern limit of built development agreed with Historic England. The SPD requires both for a landscaped transition area and the feathering down of building heights towards the northern fringe of the new town.

The village edge treatment essentially consists of a substantial southern park between the new town and village or retained ex barracks housing areas, which together form part of an appropriate transitional zone between the new town and village.

Denny Abbey and Farmland Museum

The SPD at page 166 requires a review of the access arrangements to Denny Abbey and the Farmland Museum. The other detailed points raised concern matters that can be addressed through consideration of the planning applications for the new town, not being matters addressed by policy SS/6 of the Local Plan 2018.

The Causeway Link

Support welcomed.

Greenways and Corridors

The SPD includes a comprehensive network of greenways and corridors. At page 54 the SPD states that these can provide for multiple functions including for sustainable movement, recreation, ecology, and water management. Agree that the Fen Edge/Railway Corridor on Figure 24 should not extend so far south over the location of the new station and its associated development as it currently is shown.

Agree that the Greenways shown on Figure 19 would be easier to locate if shown in green rather than red to avoid confusion with the road designations.

Agree that the reasonable needs of equestrians in relation to the new town should be set out in the SPD. See the substantive response at pages 74-75.

The SPD clearly shows areas of retained woodland consistent with section 10(a) of policy SS/6.

In regard to Wicken Fen impacts the large scale of the strategic landscaped area around Denny Abbey (approximately 2km or 1.2 miles by 1.5 km or 0.9 miles) will help to mitigate any potential recreational impacts on Wicken Fen. Walking from east to west across this area would take around 25 minutes at an easy pace. Further on-site provision of green spaces can be found along the many greenways to be provided and along green edges at Car Dyke, the South park and the Fenland Edge along which will run the 'Bounds' recreational route.

In regard to the issue of improved links to off-site open spaces the SPD is considered to provide for appropriate cycle and pedestrian links in accordance with Local Plan policy SS/6 which does not require such provision or for new links over the railway or River Cam except as set out in Table 8.

Edge Treatment

Support welcomed. The SPD at page 77 states that design codes must be used for each phase of development with an obligation to design up to the edge boundary (north, east, south and west boundaries) to address the landscape context for each edge and adjacent phases within the application sites. Within the limits allowed, variations in character along the central landownership boundary will naturally occur as building designs and materials evolve over time. In regard to greenways at the south east corner of the site these are illustrated on the Strategic Framework Diagram. The village edge treatment essentially consists of a substantial southern park between the new town and village or retained ex barracks housing areas, which together form part of an appropriate transitional zone between the new town and village.

Hierarchy of Centres

The co-location of compatible land uses / services and facilities is the strong preference of the SPD but this is not stated to be an absolute requirement.

The co-located uses illustrated on Figure 15 are not intended as a record of all the land uses to be present within each centre. Agree that the 6th form centre should be referenced under the list of Station District co-located facilities. The co-located facilities listed for each centre primarily relate to built facilities and not generally to the open space uses which may be present.

Reference to the provision of a small car park to the south of the town centre to serve the existing village at page 40 of the SPD is justified. Such a facility will be of particular benefit to the disabled, older residents, families with small children and to those planning the purchase of bulky or heavy goods.

Primary access to the relocated railway station will be through the new town, a secondary access will be provided to enable existing residents of the village and the small number of passengers from Horningsea to be able to access the station without having to go out onto the A10 and access it through the new town (see SPD references at pages 41, 60 and 85). This secondary access will not provide a through route for rat running. The SPD at page 82 already makes clear in the 4th bullet point that otherwise vehicle movement between the village and new town will be restricted by all vehicles except for buses. The SPD also seeks the provision of a new community bus service between the Cambridge Research Park and the relocated station.

The Station District is considered to be an appropriate location for higher density development and for the location of shops and other services and facilities because of its good public transport links and strong pedestrian flows.

Education

Agree that the introductory text to the education section on page 42 needs to allow for provision of the required schools to be in accordance with evidence of need and timing. Such a change would be consistent with the text in Table 8 'Education' which states that the provision of schools will be subject to triggers linked to the size of the school age population. The triggers will be defined in Section 106 Agreements. An Education Review Group will monitor school age population and anticipated need and determine the timing and phased construction of schools across the site.

Consider that schools need to have access to vehicular roads to allow vehicular access for school staff, many of whom will not live locally and for the reasonable needs of parents not all of whom will be able to cycle. The locational criteria for primary schools are considered to be appropriate, the reference to their proximity to primary and secondary roads does not mean that schools have to be adjacent to such routes. In relation to schools and similar uses the SPD already states at page 111 that designs should 'Locate uses for sensitive members of the population e.g. the elderly, schoolchildren, in a way which reduces exposure to pollution sources. Specifically, such uses should avoid locations near to the A10 to the west of the site and rail line to the east'. Applicants are required to carry out air and noise impact assessments to show how any residual impacts can be mitigated.

In regard to the primary school location to the north west of the site see the response at page 31 of this statement.

Car parking in relation to schools cannot be restricted to blue badge holders only. The car and cycle parking standards applicable to the new town are set out in policy TI/3 of the Local Plan 2018 which are for 1 car parking space per 2 staff plus waiting or 1.5 spaces per classroom; and cycle parking for at least 30% of pupils over 5 years old and 60% for pupils over 12 years old. The Local Plan states that if car parking is under provided the consequences can be inappropriate on-street parking creating highway safety risks and unsightly environments. Whilst indicative standards they do provide a guide to developers who must provide clear justification for the level and type of parking being proposed in their Design and Access Statement and/or travel plan and demonstrate they have addressed highway safety issues.

With regard to the size of primary schools the SPD must be read as a whole and when done so it can be seen that there are no inconsistencies between the sizes given on page 42 at 4 hectares per school and the more detailed reference in Table 7 which refers to a standard size of 3 hectares with a 1 hectare reserve.

In regard to the location of the town centre secondary school this location has been selected so that it provides a civic presence in the town centre that will relate well to other potential uses in this location. The school playing fields will also add open space to provide some relief to the high density centre of the town, and could also link to the Snake Pit area of open space to the east.

The nature of the schools to be provided in terms of their management and operations is not a matter for the planning system or the SPD.

A query is raised why the SPD does not require 18 forms of entry for secondary education in two schools instead of referring to 2 x 8 forms of entry secondary schools. This is because the additional 3 forms of

entry would not be provided by the developers directly being potentially required to accommodate need from the existing village and so would need to be funded by the Local Education Authority.

The secondary schools may host arts and cultural activities and events but are not required to do so by policy SS/6 or the SPD.

Non Vehicular Access Route Provision

Agree that the reasonable needs of equestrians in relation to the new town should be set out in the SPD. See the substantive response at pages 74-75 of this statement.

Infrastructure Provision

All the built development of the new town has to be contained within the Major Development Site defined in the Local Plan 2018. It is understood that some open areas to the north of the new town are proposed to be used for sustainable drainage purposes, the merits of which approach will be considered when the relevant planning applications are being determined.

Primary Movement Access

Local Plan policy SS/6 requires the new town to be served by a comprehensive movement network that connects key locations including the town centre and railway station to encourage the use of sustainable modes of travel. Provision is required to include: significant improvements in public transport including a relocated railway station, measures to promote cycling and walking including a network of attractive, direct, safe and convenient walking and cycling routes within the new town and externally linking to Cambridge, surrounding villages and the Cambridge Research Park, and necessary highway improvements. Note that there is no policy requirement to provide recreational cycle links to sites such as Wicken Fen or to provide a new bridge across the river Cam close to the new town. It follows that the SPD is considered to be consistent with these policy requirements.

To this end, the SPD is clear that development proposals must emphasise and prioritise sustainable patterns of movement across the new town (pages 45 and 46). In particular the SPD already seeks to limit and constrain vehicular access to the Town Centre (at page 46) and at page 87 states that streets which have a limited role to play in the movement network should be laid out to discourage through-traffic.

The alternative spatial solution advanced by local cycling organisations and others, of a movement network formed by a perimeter road containing the built development of the new town with radial spokes to allow a cycle-centric form of development inside it has merit and could also fulfil the sustainable movement objectives of policy SS/6. However this spatial solution does have a number of disadvantages. Historic England's views on this alternative have been sought and they identified a number of concerns as follows: " Such a road and layout would be harmful to the significance of Denny Abbey (*a scheduled monument and complex of listed buildings*) in terms the impact upon its setting including visual impact, lighting and noise etc. It would also sever the links between the new town and the Abbey, which have been a key factor in considering the spatial layout and master planning of the site to date. It would serve to form a much harder edge to the development, rather than a feathered, transitional zone as has been

previously agreed. In addition, it would go against the concept of the development reflecting the historic grain of the landscape and drawing on historical features such as the airstrip, barrack and droves. Moreover the proposal seems contrary to many of the principles of good urban design and planning. To that end, Historic England would be unlikely to support such a proposal.”

Our own urban design officers have also expressed concerns that such a spatial solution could have major implications for the legibility of the place, and the severance effect of the ring road both to the existing village and Denny Abbey.

However discussions with the Transport Assessment Team of Cambridgeshire County Council have concluded that many of the benefits the alternative spatial solution provides could be secured by:

- Amending the primary route network shown on the Spatial Framework Diagram and other figures such as Figure 18, to show a primary movement route running in a loop about 100 metres to 400 metres within the outer edge of built development.
- Indicating that the northern arm of the town centre ‘crossroads’ should only be available for all-vehicle movements during the early stages of the development of the new town, after which it would be restricted to public transport, cycle and pedestrian movements.
- Strengthening the textual guidance in the SPD to make it clear that the secondary routes shown on Figure 18 and on the Spatial Framework Diagram should not all enable cross-town traffic as an alternative to the primary routes and that in all cases their nature should serve to discourage such traffic.

These changes would reinforce the importance of sustainable movement modes within the new town and avoid the potential for negative heritage and severance impacts on the existing village and Denny Abbey. Such an approach to the secondary routes would also reinforce their attractiveness for cycling and need for all such routes to include segregated cycle route provision although some segregated routes on secondary roads may still be required where they are likely to perform a key function in the overall cycle network.

The SPD does not provide for direct vehicular links between the new town and the existing village except for a temporary period to serve the relocated railway station in the period before the primary route link to the A10 is completed. The new station now has planning permission.

Some town centre car parking is justified to allow for the reasonable needs of people with disabilities, young children, and the purchase of bulky or heavy shopping.

The SPD already makes good provision for cycle parking, cycle hire facilities and electric cycle charging points, together with cycle parking at public transport stops, the relocated station, in the town and local centres and other appropriate locations, see for example page 83 and Figure 32. Cycle parking standards and other guidance is provided by Local Plan 2018 policies T1/3 and HQ/1.

Public Transport

The SPD provides that the new town should be served by high quality public transport which will facilitate local and longer distance journeys,

and which is comfortable, convenient, attractive and with the flexibility to adapt over time to take into account potential emerging forms of public transport provision.

The Council has received consistent advice on this matter from its legal advisors. Further legal advice has been received since Scrutiny and Overview Committee on the 22nd January which confirms that this issue is something to be settled as a commercial arrangement between the parties. The advice notes that there would appear to be no planning justification for the SPD to seek to go further than it does on this issue. In regard to the planning applications as a safeguard against either party taking a commercially entrenched or unreasonable position, it is open to the Council, in principle, to make provision through a planning obligation for a binding arbitration or other form of dispute resolution if terms are not agreed by a particular date or dates.

Primary access to the relocated railway station will be through the new town, a secondary access will be provided to enable existing residents of the village and the small number of passengers from Horningsea will be able to access the station without having to go out onto the A10 and access it through the new town (see SPD references at pages 41, 60 and 85). This secondary access will not provide a through route for rat running. The SPD at page 82 already makes clear in the 4th bullet point that otherwise vehicle movement between the village and new town will be restricted by all vehicles except for buses. The SPD also seeks the provision of a new community bus service between the Cambridge Research Park and the relocated station.

The new town will be able to accommodate the CAM metro if that scheme is brought forward.

The viability of transport provision is not a matter for the SPD. Viability has to be considered during Local Plan preparation and when considering planning applications.

Ransom

In regard to representations related to ransom as the site is in multiple land ownerships, the draft SPD has been prepared to guide a comprehensive approach to development and infrastructure across the whole site consistent with Local Plan policy SS/6 for the Waterbeach New Town. This is to ensure the new settlement is delivered as a single unified development. Chapter 6 sets out an approach to delivery that requires engagement, collaboration and co-ordination between the site promoters / landowners. It seeks to enable this through s106 agreements and planning conditions, and that delivery and review groups be established that include the developers as well as South Cambridgeshire and Cambridgeshire County Council. In this regard it can be noted that the SPD already provides considerably more detail than would normally be provided on issues of delivery in a site development SPD.

The Council has received consistent advice on this matter from its legal advisors which confirms that there would appear to be no planning justification for the SPD to seek to go further than it does on this issue. There will be further consideration through the planning application process as appropriate to any further measures that could be considered in determining the planning applications that would seek to ensure comprehensive delivery of the new town.

Public Spaces

The South Park will provide a green transition between the new town and village.

The SPD seeks to integrate and enhance biodiversity across the site and avoid adverse impacts, see references at pages 33, 52, 53, 101, 106, 109, 112 and 113.

The large scale of the strategic landscaped area around Denny Abbey (approximately 2km or 1.2 miles by 1.5 km or 0.9 miles) will help to mitigate any potential recreational impacts on Wicken Fen. Walking from east to west across this area would take around 25 minutes at an easy pace. Further on-site provision of green spaces can be found along the many greenways to be provided and along green edges at Car Dyke, the South park and the Fenland Edge along which will run the 'Bounds' recreational route.

Delivery of Fixes

The potential mass transit route shown for example on Figure 18 should be retained in the SPD to accommodate future such provision, possibly in the form of the Cam Metro.

In regard to representations related to ransom see the substantive response at page 53.

Tourism

Policy SS/6 of the Local Plan 2018 does not require the development to make provision for tourism facilities and so neither can the SPD. Any such proposals would be considered on their merits. There is nevertheless clear potential for the development to generate increased visitor numbers to Denny Abbey and the Farmland Museum.

Railway Station

Primary access to the relocated railway station will be through the new town, a secondary access will be provided to enable existing residents of the village to be able to access the station without having to go out onto the A10 and access it through the new town. This secondary access will not provide a through route for rat running.

Car Parking

It is not the intention through the SPD to encourage inappropriate levels of car parking provision. Instead priority is given to sustainable transport modes including public transport, cycling and walking. The SPD encourages the provision of car parks in locations which can serve multiple land uses to minimise the overall level of provision (page 44) and at page 87 the SPD provides support for housing layouts which will help to discourage the use of the private car.

Cycleways and Footpaths

In regard to the issue of bins blocking cycleways and footpaths this is a matter of detail for consideration through the detailed design of individual development phases. The SPD does provide some encouragement to the use of innovative approaches to household waste collection and storage at page 109, but cannot require such

	<p>provision.</p> <p><u>Cycle parking</u></p> <p>Detailed cycle parking standards are included in the new Local Plan 2018 in policy TI/3 'Parking provision'.</p>
<p>Proposed Modifications</p>	<p>Page 42: '<u>Education</u>' line 2 – add the words 'in time to meet evidence of need' after the word 'facilities'.</p> <p>Figure 24 page 54 '<u>Greenways and corridors</u>' – Amend to ensure that the Fen edge / rail corridor edge marking does not extend over the new railway station and its close surrounds (to be consistent with the spatial framework diagram).</p> <p>Figure 19 '<u>Access movement and connectivity</u>' – Amend to show the principal greenways as green lines and not red at present.</p> <p>'<u>Primary Movement and Access</u>' - Amend the primary route network shown on the Spatial Framework Diagram and other figures such as Figure 18, to show a primary movement route running in a loop about 100 metres to 400 metres within the outer edge of built development.</p> <p>Page 45 paragraph 1 line 4 – delete reference to 'framework plan' replace with 'spatial framework diagram'.</p> <p>Page 45 paragraph 2 delete and replace with: 'The two primary routes will create a loop around the new town and connect directly to the relocated railway station on the eastern side of the town. In the early stages of the new town a north – south primary route will form a junction at the town centre but will later be closed to north-south vehicular traffic (except for public transport) to prioritise cycling and walking within the new town. The southern arm of this junction will provide the public transport / pedestrian / cycle connection to Waterbeach village'.</p> <p>Page 45 paragraph 3 – delete 'access' replace with 'primary route'.</p> <p>Page 45 paragraph 5 line 1 – delete "street" replace with 'primary route'.</p> <p>Page 45 paragraph 5 lines 6 and 7 – delete 'are attractive for walking, cycling and public transport, and'. Line 8 - add at the end of the sentence 'via the loop primary route'.</p> <p>Page 46 first full paragraph – add at the end of the paragraph 'To restrict through vehicle movements to sustainable modes only as the town centre develops movements north through/around the town centre will be restricted to public transport, cycle and pedestrian movements only. The timing of this change to be determined in accordance with a transport management scheme at key phase approval for the town centre development'.</p> <p>Page 46 second full paragraph – at the end of the first sentence</p>

	<p>add 'particularly to the new railway station'.</p> <p>Page 46 third full paragraph – add a new sentence at the end of the paragraph: 'This network should serve residential areas and serve to restrict easy vehicular movements from one area to another except via the loop primary route'.</p> <p>Page 46 walking and cycling first paragraph line 3 – add the words 'and linking' after 'serving'.</p> <p>Page 46 walking and cycling second paragraph – add new bullet point 4: 'Waterbeach relocated railway station to the town centre, Waterbeach lake and the Cambridge Research Park'.</p> <p>Page 47 add a new paragraph and heading after 'The Bounds' as follows: '<i>Public rights of way (PRoW)</i>: The development of the new town provides an opportunity to connect and enhance the existing rights of way network that has been hindered by the presence of restricted MOD land for many decades. Providing improved non-motorised user (NMU) infrastructure also encourages healthy lifestyles, in line with national and local policies on health and well-being. The development should not only protect existing NMU highways (footpaths, bridleways, cycle ways etc.) but should enhance them where possible. This should include an aspiration to not only improve NMU movement (including pedestrians, equestrians and cyclists) within the urban area not also to facilitate easy and convenient access into the countryside. The PRoW network should become an integral part of the development and enhanced, directional signage will need to be incorporated into the development to ensure that future residents are aware of the network available. This could also include the installation of interpretation boards (which can link to wildlife and biodiversity aims) and sufficient inclusion within resident travel plans'.</p> <p><u>'Public Transport'</u> – Page 49 fifth paragraph line 2 add after the word 'site': 'linking the railway station with the town centre and Cambridge,'.</p> <p>Page 49 figure 20 – amend the figure and key to be consistent with proposed changes to the text.</p> <p><u>Table 8</u></p> <p>Page 78 'Density and Heights' - the last sentence of the mechanism text relating to Density and Heights should be put before the existing first sentence for clarity of meaning.</p>
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4.3 Spatial Framework Diagram				
Representations Received	Support: 1	Object: 9	Comment: 5	Total: 15
Main Issues in reps	Support <ul style="list-style-type: none"> National Trust Broadly support proposed approach to 			

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Structuring Elements and Guiding Principles.

Object

- **RLW Estates** Primary road between town centre and station should not be shown down centre of strategic open space. Bannold Drove should be prioritised as a non-motorised user route but needs to retain some flexibility on vehicle access during the phasing of development. Link between station and town centre, separate road from park in a phased way and make walking and cycling the most attractive option.
- **RLW Estates** Agree with titles and subject matter of eleven fixes as "key structuring elements" of SPD. Number of comments on the detailed definition of these elements and the associated requirements.
- Green spaces. The A10.
- SPD fails to deliver on Local Plan policy – does not protect identity of Waterbeach or provide reasonable green space between village and town. Original concept was for green space between existing Village and New Town. Dropped when Bannolds were built on. SPD is developer led. Bannold inspector said in his judgment green space requirement could be accommodated beyond Capper Road. Protecting identity and character of village close to New Town is included in 4 SS/5 Major Modifications. Not applied in SPD. Only thing stopping protecting identity of Village is lack of ambition and resolve of SCDC. SPD should represent aspirations South Cambs District and people who live here.
- Desire for active transport does not seem to consider adequately needs of all the population, especially disabled and elderly. Dangers of ditches next to routes must be considered. Inadequate provision for equestrian users.

Strategic walking and cycling connections

- **Defence Infrastructure Organisation and Urban & Civic** Refers to augmentation of Cycle Route 11 which is not deliverable due to current landownership, and therefore contributions cannot be sought.
- **RLW Estates** Terminology of 'off-road' cycle routes may be confusing (which might suggest an unsurfaced route). We suggest term "traffic free" or "walking and cycling routes within parks and greenways" as alternatives.

Table 8 structuring elements

- **Defence Infrastructure Organisation and Urban & Civic** Table 8 Density and heights - would help to switch paragraphs one and two in 'mechanism' box so it is clear that density and height plans referred to are those submitted with planning applications (otherwise it might be misinterpreted as indicative plan in SPD.)
- **RLW Estates** Not clear at what stage documents will be required or what their coverage will be. Site wide Design

Code would provide opportunity to co-ordinate these elements of strategic infrastructure. Add that Development proposals and supporting information must demonstrate: How access can be achieved and guaranteed across land ownership boundaries without ransom or market value positions. Under "Relocated Railway Station" we support text which states "Appropriate funding for the provision of a relocated rail station will be secured through s106 agreements". Timing of railway station should not be left to transport assessment as early delivery required. Under "land ownership central" text under "mechanism" appears to be taken from Mills and Reeve legal note that accompanies the U&C Outline Planning Application. Inappropriate as we strongly dispute content of this note.

Comment

- **Cambridgeshire County Council** Key aspect of transport infrastructure for new town is relocated railway station. Table 8 notes this should come forward at an early stage in development, with its trigger to be set by Transport Assessments submitted with both applications. Work is ongoing with both applicants on this trigger, with emphasis being this facility and associated access road should be provided as early as practicably possible.
- **Defence Infrastructure Organisation and Urban & Civic** Provides critical 'skeleton' for comprehensive and coherent development across allocated site. Clarification that it provides the broad structure for development, but it is nevertheless indicative is particularly welcome.
- **Historic England** Note location of Park and ride at north west of site. Can see logic, close to employment site. Needs careful consideration to design to ensure setting of Denny Abbey appropriately protected and enhanced and minimise harm (e.g. lighting).
- **Historic England** Welcome section on setting of Denny Abbey and proposals to respond sensitively to setting and explore opportunities to enhance. Delete 'visual' in first bullet point. Welcome guidance on location of sports facilities and restrictions on floodlighting and changing facilities and other buildings. Parking would be unacceptable beyond northern boundary - suggest mentioned in SPD. Welcome reference to maintenance of views of key landmarks, and aspirations for an expansive parkland with views to fenland landscape and Ely Cathedral with pockets of planting. Welcome reference to former military uses and reflection of former runway in layout of Park. Welcome locating green infrastructure along former historic routes such as causeways and droves, including proposals for A Causeway Link, between lake and Abbey. Welcome proposed retention and enhancement of number of other historical features and reference to many of other heritage assets in and around site. Include reference to Waterbeach

	<p>Conservation Area and listed buildings, in particular church tower. Welcome the reference to Car Dyke. Concerned at proposed heights in open flat landscape. May be inappropriate height and density for small fen-edge town. Suggest more appropriate to keep to 4-5 storeys as at Northstowe with tall punctuating buildings being limited to 6 storeys. Points of clarification / corrections:</p> <ul style="list-style-type: none"> * Figure 21 - causeway link annotation is confusing and does not match key on either p50 or 70. * Concerns about yellow annotation of setting of Denny Abbey - could imply setting is limited to this area, when it is much wider. Figures 22 and 27 introduce different interpretations of setting. * P53 para 1 'listed building' should be plural. <p><u>Table 8 structuring elements</u></p> <ul style="list-style-type: none"> • Historic England Issue 5 - Welcome reference to setting of Denny Abbey. Wording for mechanism is not clear. Reference to 'Development proposals' for SLA could be misinterpreted as meaning built development. From section 5 we appreciate this is not case but can we suggest this is reworded to more closely reflect design aspirations for this area. <u>Issue 7</u> Welcome reference to Bannold Drove and Car Dyke as well as Denny Causeway. <u>Issue 8</u> Welcome reference to heritage assets and landscape. Welcome the requirement for archaeology strategies. <u>Issue 10</u> - See comments in relation to edge treatments for Strategic Landscape Area. Regarding Car Dyke, a green buffer area to the west of the site adjoining the A10 will encompass and protect Car Dyke.
<p>Council's Assessment</p>	<p>Support welcomed.</p> <p>The east–west primary route shown in the SPD is indicative; the SPD does not require that it be provided through the centre of an open space.</p> <p>Bannold Drove is described in the SPD as a right of way and bridleway (pages 17 and 20) and it will remain this status in the new town.</p> <p>The issue of village separation was considered through the examination of the Local Plan 2018 and the plan has been found to be sound without a policy requirement for such provision on Policy SS/6. Nevertheless the SPD makes provision for an effective transition between the village and new town. At page 60 the SPD states that this will be made up of the South Park a strategic landscaped open space, by the existing landscaped barracks entrance, and through the rear gardens of new development of an appropriate scale backing onto the existing former military dwellings along Capper Road and Abbey Place. East of Capper Road, the southern edge of the car park serving the proposed relocated rail station will comprise a landscaped</p>

	<p>space that will also include a drainage pond.</p> <p>The SPD correctly prioritises active travel modes but also seeks to provide for the reasonable movement needs of all of society including the disabled and elderly. The safety of users in regard to water features is a detailed matter to be secured through planning application process and otherwise is a responsibility of the landowner.</p> <p>In regard to the representation concerning an off-site connection to National Cycle Route 11 it is referred to as a potential connection on Figure 6 and on page 17, but on page 73 the SPD states that contributions ‘should also be sought’ for its provision. To clarify the intent of the SPD the text on page 73 should be amended to refer to provision being sought as appropriate.</p> <p>Concern is expressed that references to off-road cycle provision could be interpreted to mean unsurfaced. No change is considered to be necessary, the term off-road is clear and makes no reference to surface materials.</p> <p>Agree that in Table 8 the last sentence of the mechanism text relating to Density and Heights should be put before the existing first sentence for clarity of meaning.</p> <p>The SPD is clear that the new and relocated railway station should be delivered in the early stages of the development of the new town to help ensure the availability of sustainable travel choices.</p> <p>Agree that any new Park and Ride site within the general vicinity of Denny Abbey should be designed to ensure that any impacts on its setting are appropriately mitigated. However no changes to the SPD are considered to be necessary. At page 111 it states that no permanent lighting should be located where it would detract from the significance of Denny Abbey including in regard to its wider setting taking into account views to the south and east.</p> <p>In regard to the first bullet point on page 51 concerning Denny Abbey agree that the word ‘visual’ should be deleted as setting can encompass other relevant criteria. Also agree that car parking not associated directly with Denny Abbey or the Farmland Museum would be inappropriate within its setting.</p> <p>It is not considered necessary or more appropriate for the SPD to keep most building heights to 4-5 storeys with tall punctuating buildings being limited to 6 storeys. Given the scale of the site and in order to make best use of land in accordance with national planning policy a slightly more flexible policy is considered to be justified. The SPD considers scale and massing at pages 68 and 70 stating that: “The scale and massing of buildings in the new town should respect and respond to the character of the surrounding area...the proposal is for a new town, not a village, and must therefore create denser urban character in appropriate</p>
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	<p>locations, such as at the station district, the town centre and the lakeside. This denser urban character is not just achieved by having all the buildings closer together. It is also achieved by increasing the storey heights of buildings in appropriate locations such variety in density and height helps to create the idea of what makes a town". The SPD requires that building heights will transition down towards Denny Abbey and the existing village. Only two individual buildings of up to 8 storeys in height are allowed one in the town centre and the other in the station area with a height equivalent to the existing water tower on site.</p> <p>Disagree that the SPD references to the Causeway are confusing or inconsistent with the key.</p> <p>Agree that the Strategic Framework Diagram and Figures 26 and 27 are not consistent in the way they depict the setting of Denny Abbey. Whilst it is not the intention of the SPD to seek to delineate the setting of the Abbey, the SPD could be considered to be confusing in regard to setting.</p> <p>In regard to the reference to 'Listed Building' on page 53, line 3 agree that this should refer to 'Listed Buildings' as a matter of fact.</p> <p><u>Table 8</u></p> <p>Table 8 items 5 and 6 do not refer to development in these strategic landscape areas (SLA) but to proposals. Local Plan 2018 policy SS/6 and the SPD is clear that there can be no built development north of the boundary of the major development site (for example at pages 35, 52 and 99. No change to the SPD is necessary.</p>
<p>Proposed Modifications</p>	<p>Table 8 Page 78 '<u>Density and Heights</u>' - the last sentence of the mechanism text relating to Density and Heights should be put before the existing first sentence for clarity of meaning.</p> <p>Page 51 'Denny Abbey Setting' 1st bullet delete the word 'visual'.</p> <p>Page 73 'Strategic Walking and Cycling Connections' (National Cycle Route 11) under 'Mechanism(s) paragraph two line one: add the words 'as appropriate' after 'sought'. So that if there is no realistic prospect of the link being delivered no contributions should be sought.</p> <p>Page 53 North Park first complete paragraph first line: after the words 'sports provision', add the words 'including associated car parking'.</p> <p>Page 53 North Park add a new paragraph immediately following the above as follows: 'No other car parking should be located within the SLA / North Park that is not intended to exclusively serve the needs of Denny Abbey or the Farmland Museum'.</p> <p>Figure 27 key. Delete the word 'setting' after Denny Abbey, insert</p>

	<p>the words 'and Farmland Museum'.</p> <p>Page 65 penultimate line, delete 'listed building' add 'listed buildings'.</p>
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Section 5: Guiding Principles

5.1 Overview				
Representations Received	Support: 0	Object:3	Comment:5	Total:8
<p>Main Issues in reps</p> <p>67593 67617 67576 67625 67495 67554 67562 67428</p>	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> Remove reference to 'When the rail station is relocated, a separate access to the rail station will be created through the village'. Connections across the land ownership boundary for cycle and pedestrian routes should be agreed within the SPD. Unacceptable for there to be a vehicular link between the village and the new town. Strategic highway improvements to A10, and, Local highway improvements will achieve the opposite of modal shift, and will ensure that the development becomes car-centric, and will have an air quality impact. Additional guiding principles for Movement and Place should focus on: taking the trip by walking or cycling should always be quicker than taking the car, Cycle and walking routes should be made to be direct rather than winding, Cycle routes should be segregated from footpaths to reduce conflict between pedestrians and cyclists, Cycleway design parameters should be taken from 'Designing for Cycle Traffic' by John Parkin. Sustainable modes of travel should be phased before first occupation. RLW Estates. This section should be edited down to matters that address site constraints and opportunities or are otherwise site specific. Should be made clearer that employment space will be integrated with other uses rather than referring to 'employment land' as such. Sustainable Drainage" and SUDS design, should refer to the need to balance drainage requirements with associated ecological needs and opportunities. <p>Comment</p> <ul style="list-style-type: none"> Primary streets will include segregated cycle paths, but there is no mention of secondary streets. Vehicular connections between the village and the new town will be restricted to public transport only - should be a fix. On page 86 is the proposal "Streets which have a limited role in the movement network should be laid out to discourage through-traffic. A filtered grid of residential streets can facilitate this whilst retaining permeability and a choice of routes for pedestrians and cyclists." To ensure that this is delivered, this measure should be a fix, not a guideline. On page 87 are proposals for mitigating impacts on the surrounding road network. These should also be fixes rather than guidelines. Page 88 strategic highway 			

	<p>improvements to A10, and, Local highway improvements will achieve the opposite of modal shift, and will ensure that the development becomes car-centric, and will have an air quality impact. Key cycle and bus connections to Cambridge and other key destinations needed before first occupation.</p> <ul style="list-style-type: none"> • Historic England. No reference to historic environment in this chapter (covered in Chapter 4), but welcome references to enhancing the local landscape context and protecting the most sensitive heritage environments. Welcome reference to the retention of Military Heritage Museum. Welcome requirement for development to respond to and enhance local landscape context. In particular, welcome references to planting to filter views, as well as protection of key views to church steeples (perhaps this should also say and towers?), Denny Abbey and Ely Cathedral. Whilst welcome opportunities for allotments and community orchards, if any of these land uses are to be located to north of agreed limit of development, then built development e.g. toilet facilities etc. would be considered inappropriate. Welcome reference to need locate land uses which generate most noise and light away from most sensitive heritage environments. One of our key concerns is in relation to proposals for a park and ride site at northern edge. • Cyclists should be afforded segregation on all secondary routes. Oppose separate road access to station from the village as will not encourage active travel. The following should be 'fixes' rather than 'guidelines': * Restriction on general vehicular connection between village and new town. * Discouraging through traffic on minor streets. * Proposals for mitigating impacts on surrounding road network. Local highway improvements and upgrade to A10 will undermine modal shift aims. Air quality impacts. Should be removed from SPD. Key cycle connections should be provided as early in development as possible - too vague and must be provided before first occupation. • Natural England. Support guiding principles to create multi-functional green infrastructure network an integrated approach to biodiversity, and requirements on applicants to demonstrate protection and enrichment and long term management. Welcome requirement for applicants to demonstrate protection and enrichment of habitat and biodiversity across site are capable of delivery. Support requirement for accompanying landscape and ecology plan to set out how impacts on newly created habitats will be mitigated and managed. Integrated and coordinated approach to long term management will be critical to successful delivery of long-term benefits for people and wildlife.
Council's Assessment	Primary access to the relocated railway station will be through the new town, a secondary access will be provided to enable existing residents of the village and the small number of

	<p>passengers from Horningsea will be able to access the station without having to go out onto the A10 and access it through the new town (see SPD references at pages 41, 60 and 85). This secondary access will not provide a through route for rat running. The SPD at page 82 already makes clear in the 4th bullet point that otherwise vehicle movement between the village and new town will be restricted by all vehicles except for buses. The SPD also seeks the provision of a new community bus service between the Cambridge Research Park and the relocated station.</p> <p>Local Plan policy SS/6 requires the new town to be served by a comprehensive movement network that connects key locations including the town centre and railway station to encourage the use of sustainable modes of travel.</p> <p>The SPD is clear at page 93 that the employment provision in the new town will be located in a range of locations including the town centre, local centres and the station district.</p> <p>On page 101 the SPD makes clear that sustainable drainage schemes should lead to an enhancement of biodiversity.</p> <p>At page 82 the SPD refers to the design of residential areas and town centre should only offer limited permeability for vehicles except buses.</p> <p>The timing of transport infrastructure provision will be guided by objective evidence set out in and determined through Transport Assessments.</p> <p>The SPD is clear that all built development will be located within the Major Development Site (for example at page 163). The SPD text on North Park does not refer to the inclusion of allotments within it.</p> <p>The SPD requires the provision of a high quality, permeable and prioritised network of off road cycle routes serving the whole town and focussed on key destinations within the New Town. In addition it requires the provision of segregated cycle paths along primary routes. The County Council Transport Assessment Team do not consider such segregated paths will be needed on all secondary routes as well where traffic volumes and speeds will be reduced.</p> <p>Welcome supportive comments concerning biodiversity.</p>
Proposed Modifications	No modifications are proposed in response to representations on section 5.0 Guiding Principles.

5.2 Movement and Place				
Representations Received	Support:1	Object:20	Comment16:	Total:37
Main Issues in	Support			

reps

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- **Sport England.** Support a strategic approach to walking and cycling within Waterbeach, a key element of Sport England's 'Active Design' guidance for new residential developments. There is a good opportunity to develop Waterbeach as a case study in terms of integrating 'Active Design' principles into the master planning process. We support the adoption of a circular trail around the perimeter of the site.

Object

- **Waterbeach Parish Council.** Support user hierarchy. Focus on public transport should not be allowed to lead to removal of village services. Connect village to P&R service.
- **Carbon Neutral Cambridge.** The SPD (p.82) claims that private vehicles will "remain an essential mode of transport for many users". This assertion needs to be challenged. It is both possible and necessary to construct communities for which private vehicles are required by only a small minority. No Mention of Car Clubs or E-Bikes.
- Moving the station early in the process does not make sense. Several hundred residents who have a short walk to the current station but would be far enough from the relocated station that they would prefer to drive, either to the station or all the way to their destination. By 2025 there are projected to be 800 houses/flats in the new town, and it is likely that many of them will be in the western part of the site, not much closer to the relocated station than to the existing one, so moving the station before 2025 is more likely to cause a modal shift to the car than away from it.
- There does not seem to be any analysis of where residents will be travelling to. The supposed intention of the new town is to support the growth of jobs in the region, and providing convenient transport to London will not help that. Running a train from Ely to Cambridge North as part of their journey from the new town to the Science Park (for instance) would not be efficient. It would be better to support one of the metro systems being proposed for the City and connect the new town to that.
- There are four level crossings that are adjacent to the village or the new town. As the railway line becomes busier and there are more people living in the area, the possibility of closing them should be examined. This could be achieved by upgrading Burgess's Drove and connecting it to Clayhithe Road, replacing the Bannold Road crossing with a bridge, and building a foot and cycle underpass at the north end of the current station (north of the floodbank, where the ground level is lower). This would also make it easier to upgrade the current station.
- The proposal has main roads running through the middle

	<p>of the development, and a cycleway round the outside. This will make it easier for short journeys within the town to be by car, and make journeys through the town by foot or cycle less pleasant. Instead, there should be a perimeter road and access by car should be from the perimeter road. If cars have to go via the perimeter road while cycles can go direct, that will encourage the more healthy and less polluting mode.</p> <ul style="list-style-type: none"> • Development is planned to stretch well into the 2030s, and yet only modes of transport that date from the 19th century are considered. • Page 41, "2. Station District" first paragraph: the proposed land uses (other than the car park) do not seem to be "complementary to the station". Facilities to serve the town will not need heavy rail links; it would be better to locate them more centrally. • Page 45: The access points off the A10 need to connect to a perimeter road; the "primary routes" need to be traffic-free apart from access to properties and maybe public transport. • Page 46 3rd paragraph "A grid based secondary movement network will be necessary": for vehicular traffic, spurs in from the perimeter road are needed, not a grid. • Page 47: The idea of a circular walk around the town, while laudable, is less important than moving motor traffic out to the perimeter. The western part would, in any case, scarcely be "traffic free" being close to the A10. Better would be to improve connections to the existing footpaths, and fund maintenance of them. • Page 48: The second paragraph ("The Council supports ...") may be true but it is misguided. Change "This is due to the limiting constraints of the existing station and the need and opportunity to serve the new town and existing village better with a modern facility" in the first paragraph to "However, the assumptions behind this need to be re-examined, and options for closing level crossings (which would remove some of the constraints on the existing station) explored". Delete the second paragraph. • Page 87: 1st paragraph in right-hand column: delete "is a wide-ranging multi modal study which". The study was very limited in scope, and several options (including retaining the existing station) were not considered. • Page 88: item 2 in the numbered list: change "off road walkway/cycleway adjacent to the A10" to "narrow pavement abutting the A10 carriageway". • Page 88: delete first paragraph under "Rail improvements" • Page 88: in second paragraph under "Rail improvements", change "walking and cycling," to "walking, cycling, and new modes of transport;" • Page 88: replace first paragraph under "Highway improvements" with "Strategic highway improvements that should include an upgrade to Milton Interchange and
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	<p>could also include on or off line dualling of the A10 corridor, and upgrades to other junctions in the corridor." Removing the need for traffic from A10 to A14(W) to cross over traffic from A14 eastbound to the City would allow the rest of the A10 to flow much more freely.</p> <ul style="list-style-type: none"> • Page 121: Trigger for A10 junction (northern access) should be "before start of construction" (not pre-occupation) so that construction traffic (including for the station) can be forbidden from going through the village. • Page 122: under Mechanism, the transport strategy review group should also include representatives from the village, such as the Parish Council highways committee and Neighbourhood Plan Highways Group. • Cambridge Area Bus Users. Not enough reference to buses, within the town and to routes to other key destinations. SPD seems mainly focussed on the links along A10 - no mention is made of bus routes within the new town or to key employment sites such as Science Park, Research Park, Innovation park or Addenbrooke's. The current bus services from the village have been recently cut, are not fit for purpose being slow, expensive and infrequent. There is no evening service or Sunday service. Not mention is made of how the current service will be improved except for the proposed busway about which little detail is given. The proposed Park & Ride is likely to cannibalise any other bus routes offered and move congestion up the A10. • Traffic, parking and rat-running issues need to be tightly managed and coordinated with A10 development. Residents of Waterbeach deserve clear, vehicular access to the new station. Station needs to be moved first and fast, and with a ban on construction traffic through Waterbeach. The upgrade of the A10 is of less importance. • Objection to losing Bannold Drove as a secluded grassy track which horse riders can currently safely canter on away from high levels of passers by or traffic. Development is encroaching on the rural landscape and provisions need to be made to replace features which it eliminates. Currently it is effectively removing one of our best off road secluded rural bridleways. SPD needs to make provision for equestrians by making paths wide enough to cope with all users. • The SPD fails to provide or require provision of access for equestrians to be included in the strategic objectives nor strategic principles. Health and wellbeing benefits of equestrianism well documented. Exclusion of equestrians contrary to GCP Greenways project (Appendix 1). Discriminatory and contrary to Equal Opportunities Act. Equestrian access needs to be included in all shared use cycle / pedestrian routes except where inappropriate for equestrian access. • Cambridge Cycling Campaign. Page 88 says that 'In order to mitigate the impact upon the A10, the
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development must achieve a significant modal shift towards public transport and active travel.' The section then includes two car-capacity measures do not belong in a section about promoting public transport and active travel because increasing capacity for cars will increase the usage of cars. Table 9 proposes several good principles that we support such as 'A user hierarchy that prioritises sustainable modes of travel', 'Create walkable neighbourhoods', 'Create an environment for cycling', and 'Provide access to high quality public transport facilities'. These should be Fixes.

- **Defence Infrastructure Organisation.** Page 85 access to high quality public transport. The ambition to have as many homes as possible within 400m of a bus-stop is supported, but it should not be stated as a requirement. The text at the bottom of the first column sets out a 'requirement' for proximity to bus stops. This is in the section of the SPD on guiding principles, not fixes. Positioning every home within 400m of a bus stop is an extremely onerous 'requirement.' The Plan on Page 86 shows that many, but certainly not all homes will be within 400m of a bus stop. The SPD is directing bus priority onto key routes, which is necessary to sustain frequent services; on this basis it is not possible to also have stops within 400m of every home.
- **Cambridgeshire County Council.** The Public Rights of Way team have provided detailed comments.. These require consideration and inclusion of the needs of PROW's within the SPD text and are also provided separately. We welcome the outline proposals to create good pedestrian and cycle links as part of the development We are however disappointed that no indication has been made that off-road, leisure and utility routes will be designed and made available to all Non-Motorised Users (NMUs) in the SPD, including equestrian users. We would emphasise the importance of ensuring that good soft-user infrastructure is in place before first occupation and community facilities. It does not appear that the SPD has adequately evaluated the needs of all NMU users. SPD should respond to County Council's adopted statutory Rights of Way improvement Plan (ROWIP), and detailed points are provided. A list of improvements to the Public Rights of Way/NMU route network is also provided in the representation.
- Build the main internal roads and A10 junctions before any houses are occupied.

Comment

- **Cambridge Past Present and Future.** There should be more clear requirements in the SPD regarding relocation of the rail station and the enhancements of the A10 and its junctions as far as intersection with the A14.
- A10 - clearer plans are needed. More joined up approach between county transport development and district

	<p>housing development vital for short and long term success.</p> <ul style="list-style-type: none"> • Access to the new town and the railway station should be from A10 only, not via village. Already extreme traffic problems. There is nothing in the plan to suggest an acceptable alleviation of this situation. • Suggestions and recommendations relating to transport infrastructure: 1. New homes, new residents and new commuters - need vastly increased public transport soon & challenges transporting people on this scale. 2. Car traffic generated by Waterbeach New Town - most residents will have cars & must plan seriously to cater for the extra trips. 3. Alternatives to car travel - big assumption to change habits from cars to walking & cycling. 4. Demographic realities - ageing population less able / active. 5. School runs - significant traffic load through new town & along A10. 6. Additional bus capacity - P&R, guided bus & additional buses will not come close to catering for 1,000s additional commuters / school children. 7. Moving Waterbeach Railway Station - premature as disadvantage villagers whilst town is built out & only access via already congested Cody Road. 8. Station car parking - Cambridge North relieved pressure, more residents will drive once station moved, & attract people from wider catchment. 9. Train capacity - overcrowded but longer trains will relieve short term. 10. Waterbeach 2-Station proposal. 11. Cambridge Area Mass Transport - long term integration with metro. 12. Opportunities to augment this SPD - need realistic transport projections & imaginative provision. • Construction traffic should avoid Denny End Road which is not designed for heavy vehicles and residential properties are at risk of damage from vibrations. There is an access gate to the airfield at the A10 end of Denny End Road, suggest that all construction traffic enter by this entrance. • The new town should follow the 'People First' proposal by the Waterbeach Cycling Campaign, and establish pedestrian priority over vehicle access in the design of the new street layout. • P 82 "Active cycle and pedestrian routes and public transport should be provided at the earliest opportunity ..." is too loose a statement for such an important aspect of the new community. Phrasing should be "...must be provided in advance of the development of homes and community facilities..." P 83 "Active cycle and pedestrian routes and public transport should be provided at the earliest opportunity..." is also too loose. It must be re-phrased to "...must be provided from the beginning of the project...". It should be no quicker to take a car journey than to walk or cycle within the area of the new community. Traffic management within Waterbeach village needs to be improved in such a way that routing through the village is not considered an "easy" option for
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	<p>car drivers. Traffic calming, closure of Greenside to through traffic and in particular a 20mph speed limit should all be considered. In the longer term, restriction of Way Lane to pedestrians, cyclists and local traffic would make for a safer environment for the primary school and for those walking to the new community.</p> <ul style="list-style-type: none"> • Horningsea Parish Council. Comments on transport include: • Public transport - needs to be more prescriptive, that provision is needed from the start, with better quality and frequency than currently and trigger points. <ul style="list-style-type: none"> * Cycling - unreasonable to expect all residents to cycle to Cambridge. More capacity on dedicated routes needed. Greenways route unclear. An increase in vehicular and cycle traffic on Clayhithe Bridge and the B1047 would be dangerous without a dedicated cycle lane. The Greenways project has not indicated a clear cycling and pedestrian link from Waterbeach to Horningsea and Cambridge East and South. * Cars - even with modal shift there will be an increase in traffic in A10 corridor, causing significant delays and increased traffic on B1047. Detrimental effect on the conservation area and listed buildings of Horningsea and cause safety issues. • Despite promoting cycle and walking the car has been prioritised for movement around the town and given more convenient access. Safe and priority routes and secure cycle racks must be delivered early. Public Transport also needs early delivery. Only then can we make a modal shift. Concerned about the whole approach to transport and movement within the New Town and between there and the village of Waterbeach. There appears to be a mismatch between the ambition of the SPD to prioritise pedestrian, cycle and mobility traffic over that of the car. And the proposed Transport Plan in the document. Pedestrian, cycle and mobility traffic must always have right of way and the quickest route from a to b. Schools, rail station shopping centre and Waterbeach Village must have restricted car access in favour of pedestrian, cycle and mobility traffic. Cycle and mobility parking must be abundant and close to facilities. And must be provided early in the development process. • Do not move the railway station. • New development should always put sustainable transport first i.e NOT motor transport. The whole scheme seems to revolve around the need to make sure people have ready access for car driving/parking. It must be our responsibility to ensure most short journeys are done by walking or cycling. Present plan seems to do the opposite by routing main roads through the town centre with houses and even schools placed along side them. Better option would be a road design around the new town with better provision for walking and cycling within it to encourage more journeys by foot/cycle as often they
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	<p>would be quicker.</p> <ul style="list-style-type: none"> • I support the new railway station being built as soon as possible to relieve the parking in Waterbeach. There should be a further road out of the new town over the railway and river towards Bottisham roundabout and A10 improved before too much development is done to the new town A new road should be built off the A10 to the new station at the same time as the new station is built
<p>Council's Assessment</p>	<p>Welcome support.</p> <p><u>Perimeter road / cycle-centric layout</u></p> <p>See the substantive response in the Council Assessment to section 4.2 Key Structural Elements (fixes) at pages 51/52.</p> <p><u>Modal shift</u></p> <p>The SPD at page 82 states that a fundamental principle of the new town will be to prioritise sustainable movement across the new town, making such modes more convenient than car travel. It does this by prioritising walking and cycling as the preferred travel mode for local trips within the new town, and making provision of attractive routes for longer distance trips especially towards Cambridge. Additional measures concern public transport and the relocated railway station, giving private vehicles a low priority and limiting the permeability within the new town for private vehicles. These provisions of the SPD are consistent with Local Plan 2018 policy SS/6 which requires the new town to deliver high quality public transport links to Cambridge, including a relocated railway station, to enable a high modal share of travel by means other than the car. Achieving a significant modal shift towards public transport and active travel is also necessary to mitigate the impact of development on the A10. This will be accomplished by the provision of enabling infrastructure and by travel planning to be secured through planning applications for the new town.</p> <p>The proposed refinements to the SPD concerning the movement network of the new town will further reinforce these policy requirements.</p> <p>In regard to the Ely-Cambridge multi-modal study it is not for the SPD to make comment on its scope or findings.</p> <p><u>Pedestrian and cycle priority</u></p> <p>The SPD is clear that active cycle and pedestrian routes should be provided at the earliest opportunity (page 82) and that cyclists should have priority over cars where cycle routes cross streets (page 83). Further detail on what infrastructure will be provided to support the initial phase of development is given at page 140 which includes early provision of a new foot/cycleway from Waterbeach to the north of Cambridge and a crossing from the</p>

new town to Waterbeach Research Park. This approach is consistent with national planning policy set out in the NPPF at paragraph 110.

The implementation of this guidance will be informed by the detailed evidence to be provided by Transport Assessments accompanying planning applications.

The issue of vehicular speed limits is not a matter for this SPD but for the planning application phase of the planning process.

Village traffic impacts

Phase 1 will include necessary improvements to the A10 to accommodate additional traffic, particularly in relation to the new junctions. In addition, traffic calming is proposed in Waterbeach village as part of the improvements to cycling and walking routes to the new station, and to deter traffic from routing via Horningsea (page 121). The SPD also requires traffic calming in the nearby villages of Cottenham, Horningsea and Landbeach to be provided as indicated in Transport Assessments (page 140).

These measures are consistent with the policy requirements set out in Local Plan 2018 policy SS/6.

Railway station and level crossings

The SPD is clear that the new and relocated railway station should be delivered in the early stages of the development of the new town to help ensure the availability of sustainable travel choices. It is the subject of a separate planning process and has now received planning permission.

The area around the railway station will be one of the most accessible locations in the new town by public transport and will be served by active travel routes. It accords with national planning policy set out in the NPPF to include higher density development and a range of services and facilities in the vicinity of the station where they can be easily accessed including by people whose primary purpose for being in the area is to use the station.

Neither the Local Plan 2018 nor the SPD make mention of level crossings. It will be for the Transport Assessments of planning applications for the development of the new town to consider relevant evidence regarding the level crossings in relation to the new town. Account will also be taken of any comments made on those planning applications by Network Rail and other interested parties.

A10

Within the context of prioritising non-motorised modes, Guiding Principle 6 seeks to minimise impact on the surrounding highway network, including the A10. A multi modal study for the A10

corridor has recommended a package of measures to accommodate the transport needs of the new town, including upgrading the capacity of the A10 and measures to discourage through traffic in local villages. The SPD cannot be determinative in regard to the outcomes of the study which are still under consideration by the Combined Authority. The Infrastructure Delivery Plan identifies short term improvements to the A10 junctions and wider capacity improvements, with timing of delivery to be determined through the Transport Assessment.

The SPD requires the first phases of the development to be a location(s) that can be served by access from the A10 and the new primary route, as well as providing development to provide sustainable movement options and supportive connections with Waterbeach village. The SPD is also clear that this issue will need further consideration as part of the planning application process and that a site wide strategy should be established via collaborative discussions with the site promoters and the Councils.

In regard to the routing of construction traffic, Local Plan 2018 policy CC/6 'Construction Methods' requires the provision of temporary haul roads to be agreed by the Local Planning Authority and that these are designed, located and landscaped to avoid adverse effects on existing residents. The policy also states that where practicable construction traffic should not pass through villages. The detailed implementation of this policy will be considered through the planning application process when planning applications for the development of the site are under consideration.

Buses and bus stops

The SPD makes extensive reference to the importance of public transport and to how it should be provided in the new town. It recognises at page 85 that it will not always be possible to ensure that all new homes are within 400 metres of a bus stop by use of the wording 'ensure walking distances to public transport stops are within circa 400 metres'.

Bannold Drove / Equestrians

The SPD does not seek to change the status of Bannold Drove as a public right of way (PROW) / Bridleway. It is clearly shown on the Spatial Framework Diagram and on other figures as a green movement route running north to south through the site (see for example pages 46 and 53). It must be recognised however that Bannold Drove will in future run through a new town allocated for development in the Local Plan 2018 and so will not remain a secluded and lightly used rural track.

Disagree that the SPD should require the provision of new non-motorised user links to communities further afield such as Lode, Wicken Fen, Rampton, Stretham and Reach. Such provision is not required by Local Plan 2018 policy SS/6 and could only be

	<p>justified through a Transport Assessment process. Any related planning obligations would have to be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. It is also relevant to note that the new town will provide a very extensive network of public open spaces including the large North Park surrounding Denny Abbey. It can also be noted that both the National Trust and Natural England have expressed concerns about the possible impacts upon Wicken Fen of any increase in visitor numbers arising from the new town.</p> <p>Otherwise agree that the reasonable needs of equestrians in relation to the new town should be set out in the SPD. This is in keeping with provision for non motorised users that has been made in other new settlements such as at Cambourne. See the proposed modifications below.</p> <p><u>Public rights of way</u></p> <p>The SPD makes clear at page 73 that planning applications for the new town must be accompanied by plans for new public rights of way within the development site and demonstrate how they provide a comprehensive level of permeability within the site. Connections must also be demonstrated to strategic footpaths, cycleways, and bridleways outside the site.</p> <p>Otherwise agree that the reasonable needs of equestrians in relation to the new town should be set out in the SPD.</p> <p><u>New road towards Bottisham</u></p> <p>The provision of a new road from the A10 to Bottisham is not a requirement of Local Plan 2018 policy SS/6.</p> <p><u>Other matters</u></p> <p>In regard to the future use of private vehicles the SPD actually states at page 82 that ‘Private vehicles are given least priority, whilst recognising that they <u>may</u> remain an essential mode of travel for many users’.</p> <p>The SPD does not ignore autonomous vehicles and e-bikes. See references at pages 7, 48, and 111.</p>
<p>Proposed Modifications</p>	<p>To meet the reasonable needs of equestrians in relation to the new town the following modifications are proposed:</p> <p>Page 47 The Bounds’ – add the word: ‘,riding’ after cycling and before leisure to indicate that this circular route could in whole or in part be made suitable for all non motorised users.</p> <p>Page 53 – ‘North Park’ – on line 9 add the word ‘and’ before footpaths and the words ‘suitable for all non motorised users including horse riders’ after cycle ways. Then add a new sentence to read ‘Such provision should link up to other routes</p>

	<p>for non motorised users across the site including to the Runway Park, the Bounds and to Bannold Drove’.</p> <p>Page 53 – ‘Runway Park’ - on line 8 add the word ‘and’ before footpaths and the words “suitable for all non motorised users including horse riders’ after cycle ways. Then add a new sentence to read ‘Such provision should link up to other routes for non motorised users across the site including to the North Park, the Bounds and to Bannold Drove’.</p> <p>Page 54 – ‘Greenways and corridors’ – 2nd bullet. Add the words ‘suitable for all non motorised users including horse riders’ after routes.</p> <p>Page 55 – ‘Winfold Greenway’ and ‘Waterbeach Bounds’ in both add the words ‘suitable for all non motorised users including horse riders’ after routes.</p> <p>Page 55 ‘East-West corridors’ – on Line 9 add a new sentence after ‘will be provided’ as follows: ‘Some of these routes to be suitable for all non motorised users including horse riders’.</p> <p>Table 8 ‘Strategic walking and cycling connections’ page 73 – add a new second sentence under the mechanism heading as follows: ‘Provision should be made for all non motorised users including horse riders’.</p> <p>Section 5.2 ‘Movement and Place’ – add a new section after 3 ‘Cycling’ as follows: ‘Create an environment for equestrians Development proposals will be required to create a network of routes suitable for all non motorised users including horse riders across the site. The routes should be constructed to a multi-user standard and include appropriate barriers, soft surfaces, mounting blocks, sight lines and safe road crossing designs’.</p> <p>Table 9 page 89 add a new row beneath 3 ‘Create and environment for cycling’ as follows: Create an environment for equestrians In paragraph 2 under mechanism(s) after ‘infrastructure network’ add the following words : ‘making suitable provision for all non motorised users including horse riders’.</p> <p>Section 6.2 ‘Infrastructure Delivery Plan’ – Page 118 retitle ‘Pedestrian and cycling infrastructure’ to ‘Non motorised user infrastructure’.</p>
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5.3 Housing, Mixed Use and Community				
Representations Received	Support:	Object:3	Comment:1	Total:4
Main Issues in reps	Support			

<p>67359 67540 67344 67400</p>	<p>Object</p> <ul style="list-style-type: none"> • Waterbeach Parish Council. Remove term 'key worker housing', as inherently unfair. All workers are key. • Carbon Neutral Cambridge. New housing at Waterbeach New Town needs to reflect the increasing requirement of tenants to have an office, workshop or studio in order to work from home. • CLT promotion deserves a full section not maybe a paragraph. <p>Comment</p> <ul style="list-style-type: none"> • Cambridge Past Present and Future. The SPD should make provision for self-build options, such as bespoke building. One of the fastest growing housing needs is for the older population. In order to ensure the new town provides suitable housing for the community we recommend that there is a specific commitment to housing for 'over 55's'.
<p>Council's Assessment</p>	<p>Many key employers report that high house prices are affecting their ability to recruit and retain staff. Where supported by robust evidence the inclusion of an element of such housing in the new town can be supported as helping to meet a local housing need.</p> <p>The SPD already supports provision for home working at page 93 as does Local Plan policy H/18 'Working at Home'.</p> <p>The SPD already states that some of the affordable housing on site could be delivered through a Community Land Trust (page 91).</p> <p>The SPD makes provision for self build options and for older people's housing at page 91.</p>
<p>Proposed Modifications</p>	<p>To better reflect the potential benefits of a Community Land Trust for the local community it is proposed to delete the existing CLT text on page 91 and add a new section 10A as follows:</p> <p>"Community Land Trusts</p> <p>The Council is supportive, in principle, subject to viability and deliverability, to working with a Community Land Trust to support the provision of the new town, contributing to a broader mix of house types and delivery models".</p>

<p>5.4 Health</p>				
<p>Representations Received</p>	<p>Support:</p>	<p>Object:6</p>	<p>Comment:2</p>	<p>Total:8</p>
<p>Main Issues in reps 67485 67451 67358 67308</p>	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • Should include more details on health provision, to be developer funded. At early stage of development. Present village surgery at capacity. One new surgery inadequate. 			

<p>67367 67401 67455 67528</p>	<ul style="list-style-type: none"> • Waterbeach Parish Council. Impact of Waste Management park to be addressed in the SPD. Need commitment from County Council to address site management issues. Also, further information needed regarding land contamination of the new town site. SPD should make reference to and provision for design to reduce opportunities for and risk of crime. • Cambridge Without Incineration. There is no provision for an area air quality management plan. It would be negligent to leave this until building begins and air quality deteriorates. SCDC have obligations to protect air quality. A new AQMA should be declared. <p>Comment</p> <ul style="list-style-type: none"> • Cambridgeshire County Council. The Joint Strategic Needs Assessment contains evidence review of built environment's impacts on various themes. SPD reviewed against these to ensure addresses impacts on health & wellbeing. Overall approach welcomed. Particularly shift in mode from car to sustainable transport. Need to respond to changing technologies like electric & autonomous vehicles. Use of population multiplier of 2.8 people is appropriate. Aspirations and 8 strategic development objectives are supported, particularly prioritising walking and cycling. Locating health centre in town centre is supported as access to health is key component. Needs to be detailed phasing plan to provide community facilities early. Need stronger walking and cycling emphasis i.e. routes for leisure and commuting. Allocations for sport must be in accessible locations. Use Accessible Natural Greenspace Standard. Table 7 makes no reference to health facilities. Clarity needed whether it is part of community facilities land use budget. Table 8 should be expanded to require detailed phasing plan for whole site. Benefit from separate section on community uses / facilities. Require developers to prepare community development, play and/or health and wellbeing strategy. (Learn from Northstowe). Refer to tools (Housing for Older People Supply Recommendations) for quantifying need and type of older people's housing, like Northstowe. Should be seen in context of ageing population. Age friendly design concepts should be integrated within development not just need for accommodation. • Little mention of an aging population. How do you ensure a good range of shops for example newsagents, grocery, café etc?
<p>Council's Assessment</p>	<p><u>Health Care provision</u></p> <p>Section 5.4 of the SPD addresses the issues of healthy communities and healthcare provision from page 96. The SPD requires the provision of a new health centre to provide a GP surgery, dentists, pharmacy, and optometrists. Provision to be in-</p>

step with the provision of new homes.

A healthy community

At page 97 the SPD requires the preparation of a Health Impact Assessment to detail how health effects in the round have been taken into account in planning decisions.

The SPD also requires the preparation of a Community Strategy to demonstrate that adequate and suitable provision of facilities will be provided for the community including for its initial phases of development (SPD pages 95 and 97).

Air quality

An Air Quality Management Area designation is only required where there are exceedances of national objectives for annual mean nitrogen dioxide and daily mean PM10. SPD Guiding Principle 36 Air Quality outlines measures for mitigating emissions through the design and construction of the new town. Policy SS/6 requires there to be no significant adverse impact on local air quality, and developers will be required to submit a Low Emission Strategy and Sustainability Statement to demonstrate how they have addressed this issue.

Land contamination

Policy SS/6 criteria 15 requires developers to undertake site investigations and assessment of land contamination issues to ensure the land is suitable for its intended purposes. Including in relation to the safe removal of ordnance.

Healthy movement and green spaces

The SPD makes provision for an extensive network of off-road movement routes and for a range of green spaces across the site in accordance with the space standards set out in the Local Plan 2018.

Housing and facilities for an older population

Local Plan policy SS/6 at section 8a) requires the creation of a balanced and inclusive community. This is reflected in the SPD at pages 91 and 94. Older people will also benefit from easy access to public transport, open spaces, services and facilities and a network of cycleways and off-road pedestrian routes.

Other issues

The issue of designing out crime is addressed by Local Plan 2018 policy HQ/1 'Design Principles'.

The SPD makes proportionate reference to autonomous vehicles At page 7, and to electric car and cycle charging points at page 48.

	The SPD requires the provision of a number of local shopping centres in addition to the town centre. The type of retail occupiers present in the new town will vary over time.
Proposed Modifications	No modifications are proposed in response to representations on section 5.4 Health.

5.5 Open Space, Play and Sport				
Representations Received	Support:2	Object:3	Comment:2	Total:7
Main Issues in reps 67520 67311 67396 67349 67511 67309 67633	<p>Support</p> <ul style="list-style-type: none"> • Sport England. With regard to 'Outdoor Sports Facilities' flexible approach needed to provision, for in some cases it may be better to invest in existing off-site facilities that can be enhanced to meet increased demand. Advise that the guidance should be amended to include this option, if needs can be best met that way. There could also be the opportunity for the development to be the site of a new home for local sports clubs that will need additional capacity to meet demand generated by the large scale housing proposals in the local area, therefore the guidance could also make provision for this possibility. • Sport England. We support the co-location of schools and community sports facilities. The secondary schools offer an opportunity to include indoor facilities that can be used by the local community during out of school hours. Or potentially, community indoor facilities could be provided co-located with the school to allow flexible use during the day. <p>Object</p> <ul style="list-style-type: none"> • The National Trust. The SPD should look beyond the site boundaries and establish guiding principles for integrating the site more effectively with the larger scale landscape of the Fen, and consider possible off-site mitigation and/ or enhancement opportunities, drawing where appropriate on Section 106 contributions. We note the reference under Principle 20 to 'utilising the opportunity to connect to the many surrounding green infrastructure assets' however there should be a clear commitment to this as a Guiding Principle. Without this commitment we question whether the SPD is fully compliant with Local Plan Policy NH4 in terms of aiding the delivery of the Cambridgeshire Green Infrastructure Strategy. • The development is close to important wetland habitats including Wicken Fen NNR the plan should allocate S106 money to the restoration of the wider Fenland landscape by purchase of land surrounding Wicken Fen. Good cycle links between Wicken Fen, Lode and Ely should be provided for recreation for people from the new town. The plans do not seem to include sufficient public facilities 			

	<p>such as an outdoor swimming pool. The density of the development is so high that there is no space for the future community to develop its own facilities and land uses in the future. The small amount of green space allowed, will, over-time be eroded to provide land for these facilities.</p> <p>Comment</p> <ul style="list-style-type: none"> • The Wildlife Trust. The Wildlife Trust supports the overall approach outlined in point 20 (Create a multifunctional green network). However, the fourth bullet point should reference delivering a measurable net gain in biodiversity" The summary at table 12 should include reference to the proposed Landscape and Ecological Management Plan (LEMP). The Mechanism(s) section for these issues should also refer to not just how these elements will be provided, but how they will be managed and maintained in the long term. • Open space and sports facilities planned near village now at far north of site at a great distance from current village residents. Trigger points for providing new facilities do not seem to take account of the need for the existing village facilities to cope with greater demand in initial stages.
<p>Council's Assessment</p>	<p>Welcome support.</p> <p>Disagree that the SPD is not fully compliant with the Local Plan 2018 policy NH/4. The new North Park of the new town will add an extensive area of open space which will be predominantly used for informal open space, ecological enhancement, sustainable drainage, footpaths and cycle ways. It also represents an extensive semi-natural green space for enjoyment by residents and visitors, and an opportunity for significant habitat creation and biodiversity enhancement, including wetland habitat compensation areas where relevant.</p> <p>In regard to the use of a s106 planning obligation to enable the restoration of the wider Fenland landscape by purchase of land surrounding Wicken Fen and the provision of cycle links to Wicken Fen, Ely and Lode these are not requirements of Local Plan policy SS/6 and so fall for consideration through the planning application process. Any such planning obligations will have to be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. It is also relevant to note that the new town will provide a very extensive network of public open spaces including the large North Park surrounding Denny Abbey.</p> <p>The SPD clearly refers to the management in relation to landscape and biodiversity when it refers to the required Landscape and Ecology Management Plan.</p> <p>Disagree that all of the open space and sports facilities are concentrated to the north of the new town as illustrated at Figure</p>

	23 on page 52. Specific reference to sports provision is made in relation to South Park adjoining the existing village.
Proposed Modifications	No modifications are proposed in response to representations on section 5.5 Open Space, Play and Sport.

5.6 Sustainable Drainage				
Representations Received	Support: 0	Object:2	Comment:4	Total:6
Main Issues in reps 67521 67357 67543 67579 67398 67378	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • Waterbeach Parish Council. Essential that SUDS are designed to be safe. Need reassurance SUDS will work, and wont impact on Wicken Fen, Cam Washes. • Page 101 5.6 Blue infrastructure Suds design - Because of the natural water content on the land, climate change and concreting over hectares of land (including in the main previously undeveloped land) have studies been completed to ensure water levels are maintained at Wicken Fen and the Cam washes? <p>Comment</p> <ul style="list-style-type: none"> • The Wildlife Trust. There is a need to consider maintenance of green infrastructure in the long term, and we suggest a similar approach to that taken in regard to SuDS, could be applied to green infrastructure, i.e. the addition of a specific point outlining long-term maintenance and management requirements. • Cambridge Past present and Future. The SPD should have more specific detail on levels of sustainability required, and of flood prevention/defence. • Anglian Water. Support water re-use and SUDS. But Anglian Water cannot enforce either of these options and are not responsible for their implementation or long term maintenance. • Environment Agency. More is needed in the SPD on flooding and wastewater to fulfil Local Plan, SEA/SA and NPPF. Worked in parallel with SCDC, Anglian Water, RLW Estates and Urban & Civic to shape planning applications and related water quality aspects of foul water. Earlier work on Denny St Francis Water Cycle Strategy identified key constraints and opportunities for SPD to address, but they do not appear to have made their way into the SPD. Advised on scope of SA - that significant environmental issues (flooding & wastewater) needed to be addressed. • Following issues need filling & strengthening: <ul style="list-style-type: none"> * Cam Washes SSSI - only a single mention yet significant site * Use of flood maps and need for SFRA * Flood risk and on site hazards - effects of flood defences 			

	<ul style="list-style-type: none"> * Insufficient SFRA information in Local Plan evidence base * Climate change and infrastructure to adapt to it * Missing flood risk sequential approach * Contribution to flood risk infrastructure for upkeep * Status of comparable constraints - Denny Abbey has assessment of the setting - similar approach needed for water in respect of evidence base, involvement of statutory consultees, spatial approach, follow national policy * Spatial illustrations need to have regard to avoiding and managing flood risk * Welcome SUDs but blue infrastructure is wider * Support clear infrastructure requirement for water usage * SPD needs to fulfil its own requirements - flood risk management & waste water infrastructure (include a new section)
<p>Council's Assessment</p>	<p>Local Plan policy CC/9 'Managing Flood Risk' requires surface water discharge from development sites be limited in volume and peak rate to natural greenfield rates.</p> <p>Sustainable drainage systems achieve this by safely storing any additional water and then releasing it into the environment in a controlled way whether into the ground or into a watercourse. Their use is supported by national planning policy and guidance and by Local Plan 2018 policy CC/8 'Sustainable Drainage Systems and by policy SS/6 for the new town. No concerns have been raised about the provision of SUDS on site in relation to Wicken Fen or the Cam Washes by the National Trust or Natural England. It can be noted that water levels at Wicken Fen are already maintained by pumping as the site is higher than the surrounding fields.</p> <p>In regard to waste water recycling the SPD is clear that this is a matter for a separate planning application process (see SPD pages 125 and 126).</p> <p>In regard to the residual flood risks which could affect some of the land to the east of Bannold Drove in the event of a breach in the existing river Cam flood defences it is agreed that the SPD could usefully provide additional guidance. The significant majority of the new town site is not in the flood plain or at flood risk and it is mostly located in the lowest risk flood zone 1. Notwithstanding, hazard modelling has shown that land east of Bannold Drove could be at what is known as residual flood risk if a breach of the existing flood defences on the River Cam were to occur. This residual risk was set out in the Water Cycle Study of 2014 which set out ways in which this residual risk could be effectively mitigated such as new bunding, with maintenance secured through the development or by raising land levels. Nevertheless it is agreed that the SPD could usefully provide additional guidance to assist the future planning of the new town. Following a meeting the wording of the additional guidance to be included in the SPD has been agreed with the Environment</p>

	Agency and Cambridgeshire County Council as the local lead flood authority.
Proposed Modifications	See proposed new section 5.8 to be included in the SPD after 29 'Sustainable Design and Construction' (see text immediately below). The proposed changes to be included in the SPD consist of additional text to be added to section 5.8 of the SPD at the end of page 106 entitled 'Managing Flood Risk, and the addition of a note on the Spatial Framework Diagram stating that the location of vulnerable land uses in areas of residual flood risk will be subject to the findings of site specific flood risk assessments.

5.8 ENVIRONMENTAL SUSTAINABILITY AND CLIMATE CHANGE

29a Managing Flood Risk

The Council has adopted the Cambridgeshire Flood and Water Supplementary Planning Document (the Flood and Water SPD), and this should be considered when preparing planning applications.

Planning applications for the site will need to be accompanied by a Site Specific Flood Risk Assessment which meets the requirements of national guidance, and the Flood and Water SPD; and which in particular takes account of a sequential, risk-based approach to the location and quantum of development on site.

The significant majority of the new town site lies within flood zone 1, the lowest area of fluvial and tidal flood risk and which provides adequate space to accommodate a new town of approximately 8,000-9,000 homes. Small areas on the east and west edges of the site are in flood zone 2 and 3.

Whilst mostly located in flood zone 1, hazard modelling has shown that currently the eastern edge of the major development site could be at risk if a breach of the existing flood defences on the River Cam were to occur. This primarily impacts land to the east of the Bannold Drove track.

Breach modelling was carried out to inform a Water Cycle Study for the site in 2014, guided and endorsed by a stakeholder group comprising Anglian Water Service Ltd, Cambridgeshire County Council, Cambridge Water, the Environment Agency, South Cambridgeshire District Council and the Waterbeach Level Internal Drainage Board.

In line with the principle of the sequential approach within National Planning Policy and Guidance, and in the Flood and Water SPD, vulnerable¹ development should be avoided wherever possible in areas at risk of flooding from any source. Where this is not possible and development has to be located in areas at current or future flood risk, vulnerable development should be located in areas of lowest flood risk so as to minimise flood risk to people and property.

¹ Highly vulnerable and more vulnerable land uses as defined in National Planning Policy Guidance (including new dwellings, schools, nurseries etc)

Where development in flood risk areas is deemed necessary, developers will need to ensure a long term solution is put in place that follows the flood risk management hierarchy in the NPPF (with accompanying practice guide) and the Cambridgeshire Flood and Water SPD. Flood control measures should be considered to:

- Steer flood risk away from development without increasing risks to others, and consider opportunities to reduce flood risk overall, taking account of climate change projections;
- take account of and where possible meet green infrastructure objectives; and
- ensure that flood assets that the development relies upon have a maintenance regime indicated that can sustain them for the lifetime of the settlement whilst minimising any need for pumping.

Developers should seek opportunities to collaborate with local partners and infrastructure providers to assist with funding, design, delivery and future upkeep of flood control measures. Planning obligations may be necessary to secure and maintain infrastructure on or off-site as appropriate.

The site of the Waterbeach New Town is allocated for development in the South Cambridgeshire Local Plan adopted in September 2018. National Planning Policy requires that land be used effectively whilst safeguarding and improving the environment and ensuring safe and healthy living conditions.

Where it is not possible, consistent with wider sustainability benefits, for development to be located in areas with a lower risk of flooding, development which is vulnerable to flood risk arising from a breach of flood defences must be demonstrated to be safe for its lifetime, not increase flood risk elsewhere and have wider sustainability benefits to the community which outweigh any residual flood risk. Plans and development should also seek opportunities to reduce the causes and impacts of flooding. The Council will have regard to the objectives and criteria used within the Local Plan's Sustainability Appraisal framework in making an assessment of the wider sustainability benefits of such development.

In regard to these wider sustainability benefits, the new railway station site (with planning permission) is located within flood zone 2. The National Planning Policy and Guidance requires the effective and optimal use of land. This includes taking account of the availability and capacity of infrastructure and its scope to promote sustainable travel modes that will help limit future car use. The Council has proactively reduced flood risks around the station by relocating it to an area at lower risk than its current location.

The suitability of the land at risk of flooding, including land east of Bannold Drove in flood zone 2 and at residual flood risk, to accommodate vulnerable land uses will need to be carefully considered through the planning application process. Such applications and their assessment will have appropriate regard to: a sequential approach being taken in accordance with the NPPF, taking opportunities to control risks and where possible, reduce flood risk overall. Proposals should secure long-term management and maintenance requirements, and take account of upper scenario future climate change and any wider sustainability benefits of development in this location.

Table 15 Summary of Principles

Add new row as follows:

Principle / Issue	Mechanism(s)	Documents/Plans	Key Policy Reference
29a Managing Flood Risk	<p>Follow a sequential risk-based approach to the location of and the uses within the development. Development will follow a sequential approach having regard to local plan policies, and National Policy where this is more up to date.</p> <p>Where following application of the sequential approach it is not possible, consistent with wider sustainability benefits for all development to be located in areas with a lower risk of flooding the development must:</p> <ul style="list-style-type: none"> • Be demonstrated via a site specific flood risk assessment to be safe and not increase flood risk elsewhere. • Contribute to the improvement and perpetual upkeep of flood defence assets it relies upon, and consider the opportunities to 	<p>Planning applications should be supported by Site Specific Flood Risk Assessments, which meets the requirements of national policy and guidance and the Cambridgeshire Flood and Water SPD. (Environmental Statements)</p>	<p>SCDC Local Plan Policy CC/9</p> <p>Cambridgeshire Flood and Water Supplementary Planning Document</p> <p>NPPF2 and NPPG</p>

	<p>work with potential partners and landowners to secure betterment and climate change adaptation.</p> <ul style="list-style-type: none"> • Demonstrate wider sustainability benefits to the community that outweigh the residual flood risk. 		
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Spatial Framework Diagram

Amend the spatial framework diagram key as follows: (new text **bold and underlined**)

All of the structural elements are added together to create an indicative overall framework plan. **Note that the location of vulnerable land uses in areas of residual flood risk will be subject to the findings of site specific flood risk assessments.**

5.7 Productive Landscape and Planting				
Representations Received	Support: 0	Object: 4	Comment: 0	Total: 4
Main Issues in reps 67356 67537 67449 67478	Support Object <ul style="list-style-type: none"> • Waterbeach Parish Council. Who will take responsibility, and how will it be funded? • Impact on the fenland environment. Not adequately addressed, Short Drove development and proposed station relocation will use up valuable farm land and wildlife habitat. • Defence Infrastructure Organisation. Page 105 Table 14 refers to a site wide planting scheme and landscape strategy. Strategies and schemes beyond the SPD will come forward only through outline planning applications so will not be site wide. Proposals can still be set within a site wide context. • We have been promised that there would be a designated space between the village and the proposed development. The unique Fenland landscape is worth preserving. Comment			

<p>Council's Assessment</p>	<p><u>Governance and finance</u></p> <p>The Infrastructure Delivery Plan outlines that contributions will be sought for the on-going maintenance and governance issues in relation to areas of informal and formal open space, allotments, community orchards and landscaping measures contributing to the setting of Denny Abbey.</p> <p><u>Site wide strategies</u></p> <p>The draft SPD has been prepared in accordance with Local Plan Policy SS/6, which requires the comprehensive development of the site as a whole. Key Issue 1: The need for comprehensive development recognises that sustainable development and delivery can only be achieved through the comprehensive planned development of a single integrated new town.</p> <p>A landscape strategy will be required to provide a comprehensive site wide approach. More detailed plans, such as Landscape and Ecology Management Plans, will then be prepared to accompany the planning applications to outline how the impacts on existing and newly created landscapes will be mitigated and managed.</p> <p><u>Fenland landscape</u></p> <p>The Council agrees that the Fenland environment provides an important context for the new town, and this is reflected in Chapter 2 and in the Vision for the new town. Guiding Principle 29: Sustainable design and construction specifically references the need for creating harmony with the Fenland landscape. Measures outlined in the SPD to help achieve this include: the North Park, which will wrap the northern edge of the town and provide a transition between the development and fenland landscape and offer extensive views to the fenland landscape. In addition, green buffers, hedgerows and informal woodland blocks will filter views eastwards into the fenland landscape, and wetland areas provided within the town to echo the fenland landscape.</p> <p><u>Buffer to the village</u></p> <p>Key Structuring Elements (Fixes) 10: Edge treatments outlines the proposals for the edge treatment with Waterbeach village to the south. An area of parkland will be provided to the south west (South Park), including areas of formal and informal open space. In addition, the existing mature trees, hedges and open space around the entrance to the barracks will be retained and enhanced. Whilst the south eastern edge near the railway line will be more built-up, there may be opportunities to create greenways and landscaped areas.</p>
<p>Proposed Modifications</p>	<p>No modifications are proposed in response to representations on section 5.7 Productive Landscape and Planting.</p>

5.8 Environmental Sustainability and Climate Change				
Representations Received	Support: 1	Object: 10	Comment: 7	Total: 18
Main Issues in reps 67522 67355 67541 67306 67305 67304 67582 67585 67343 67514 67530 67402 67382 67303 67527 67531 67479 67380	Support <u>Waste management</u> <ul style="list-style-type: none"> • Cambridgeshire County Council. References to waste management are welcomed, particularly Sustainable Waste in the Guiding Principles and waste section within the Infrastructure Delivery Plan. SPD should make reference to Cambridgeshire and Peterborough Minerals and Waste Development Framework (MWDF) as part of Development Plan, must be considered in planning application(s). Reference should be made to Policy CS28 Waste Minimisation, Re-use, and Resource Recovery and adopted RECAP Waste Management Design Guide SPD. <u>Renewable technology</u> <ul style="list-style-type: none"> • Consideration of a connection between potential energy from waste at Waterbeach Waste Management Facility and a heat network is welcomed. • Submitted planning applications suggest that energy facilities may be developed. Any energy facility reliant on waste as a feedstock would require planning permission from County Council as Waste Planning Authority. Object <ul style="list-style-type: none"> • Waterbeach Parish Council. Sustainability wording in plan is too aspirational. Should set standards, like BREEAM. Provision of enhanced parking for electric cars should be removed. Concern regarding plan for temporary waste management facility on site. Water Stress - no reference to new water main. Can water supply be guaranteed. Will Wicken Fen / Cam Washes be safeguarded? • Inadequate consideration of impacts on existing village. <u>Energy efficiency standards</u> <ul style="list-style-type: none"> • Carbon Neutral Cambridge. The SPD should specify that all new homes should be Net Zero carbon emissions in operation by 2030. At a very minimum, the required should at least match, and preferably exceed the standards set by other developments. Rather than just requiring developers to "think about" providing smart energy systems, the provision Smart Energy systems should be mandatory. Waterbeach will take 25 years to build, we are calling for regular reviews (say every 5 years) to allow targets to be increased in line with government policy, the advice of the Committee on Climate Change and science based targets for how to achieve the necessary reduction in carbon emissions. SPD should set firm standards to require developers 			

avoid overheating during heatwaves, particularly in single aspect south facing flats, and firmer standards to mitigate flood risks.

- It is important that new homes be built to the highest possible energy efficiency standards. The current energy efficiency requirements for new homes in the SPD is not fit for purpose.
- **Cambridge Carbon Footprint.** Wholly inadequate to specify that homes are built to building regs + 10% carbon reduction due to onsite Renewable Energy. All new homes should be Net Zero carbon emissions by 2030 and meet the standards specified in policy 28 of the Cambridge City Local plan. Smart Energy systems should be mandatory. The provision and smart management of significant quantities of on-site renewables and storage will be vital for delivering an attractive place to live well before 2030. Regular review of targets to allow targets to be increased in line with government policy. SPD should set firm standards to require developers avoid overheating during heatwaves, particularly in single aspect south facing flats. Flood risk also needs attention, particularly in the high-risk areas to the Eastern part of the development, which includes the strategically important areas surrounding the train stations (current and new).

Renewable technology

- Remove the energy from waste references.
- Page 109 section 33. "temporary waste management" what will it do and how will it be accessed as the site develops. How will the waste be disposed of offsite?
- **Cambridge Without Incineration.** The SPD must contain restrictions on the building of anything except the EU's top 3 energy from waste solutions- this will allow for innovative technology to be included as technologies supersede each other over the years and displace older dirtier technologies.

Water recycling centre

- Any new WRC to be at least 1,000 metres away from the River Cam and any other recreational use.

Air quality

- The SPD must require an Air Quality Management Area designation and management plan. No mention of the County Air Quality Plan or of the Milton AQMA.

Comment

Biodiversity

- **The Wildlife Trust.** First bullet point under section 29 remove the wording "where possible" promoting and enhancing. We support point 34 (Integrate and Enhance Biodiversity), and the approach which bases decisions on

a full programme of surveys and monitoring, and considers existing and created habitats as part of a wider ecological network. Support the proposed production of a Biodiversity Management Plan, although for consistency with the rest of the document, suggest that this should be referred to as a Landscape and Ecological Management Plan (LEMP).

- Support that in table 15, the LEMP is included in the list of documents/plans for point 34 and that there is a reference in the Mechanism(s) section to management and to applicants being expected to demonstrate that their proposals are capable of delivery. However, for clarity we suggest the following changes to the table.

*Paragraph 2 “Applicants will be expected to demonstrate that their proposals for the protection and enrichment of habitat and biodiversity across the site are capable of delivering a net gain.”

*Paragraph 3 “ Applications must be accompanied by a landscape and ecology management plan (LEMP) which sets out how impacts on existing and newly created habitats will be mitigated and managed in the long term”.

Flood risk

- **Cambridgeshire County Council.** RLW modelling assesses and confirms the issue of residual flood risk within development area. Risks need to be properly illustrated and flood zone mapping updated to include climate change and functional floodplain. Normally part of strategic flood risk assessment (SFRA). Information used to enable flood risk sequential approach to the location of development within the site. Risk that vulnerable development will be located in areas with significant residual risk from breaching of river banks. Existing protection in this area is not designated on flood map, has no long term maintenance plan and is of varied construction quality. If schools or other vulnerable development are located on edge of flood zones, this would be a concern. While the details of surface water management details can be largely dealt with as part of site design, it is important that surface water drainage systems would not be inundated by river, removing any capacity to protect site from impacts of direct rainfall.

Waste water recycling

- **Cambridgeshire County Council.** The SPD needs to recognise the importance of and complexities for delivering off-site waste water recycling facility. Major new waste water infrastructure will be required once limited capacity in existing works on Bannold Drove is taken up. SPD plans removal of existing, but makes no firm commitment for replacement nor timing in relation to phasing of housing development.
- Infrastructure Delivery Plan partially addresses the issue. However, only refers to need for replacement facility to be

	<p>delivered off site by Anglian Water. Needs to be recognition of the implications for housing delivery whilst this off-site infrastructure is in planning and delivery stage.</p> <p><u>Minerals</u></p> <ul style="list-style-type: none"> • Cambridgeshire County Council. There is a lack of regard to mineral safeguarding and making best use of mineral resources, and reference should be made to Policy CS26 of the MWDF. Mineral safeguarding and making best use of mineral resources has not been considered during the preparation of SPD. Part of site is identified as containing a sand and gravel resource. Policy CS26 (Mineral Safeguarding Areas) of adopted MWDF seeks to prevent sterilisation of valuable mineral resources. Requested that Construction Environment Management Plan (CEMP) should address the sustainable use of any minerals extracted during the construction of development. Proposals for how such mineral extracted will be used sustainably should be set out in CEMP. If mineral is to be removed from site this will require planning permission from the County Council. Add reference to Policy CS26 in Appendix 1. <p><u>Eco homes / project</u></p> <ul style="list-style-type: none"> • More emphasis needed on development of quality 'green' housing. • Waterbeach Community Land Trust should be given some land to build an eco project. The carbon footprint of all the development needs to be minimised. Sustainable eco building with minimal cars outside centre, like Eddington, Cambridge and Houten, cycle town in the Netherlands. Global warming is now drastic 5 years possibly to the point of no return to save the planet. This must now impact on all future building plans. Shouldn't Cambridge lead the way of what is right to do. Build a new town with public transport and cycling as key features. <p><u>General comments</u></p> <ul style="list-style-type: none"> • Cambridge Past Present and Future. The SPD should include requirements for developers in relation to work-related traffic, waste, materials, site buildings, etc.
<p>Council's Assessment</p>	<p><u>Waste management</u></p> <p>Note the support from Cambridgeshire County Council, in relation to the Sustainable Waste in the Guiding Principles, waste section within the Infrastructure Delivery Plan, and consideration of a connection between potential energy from waste at Waterbeach Waste Management Facility and a heat network</p> <p>Agree the SPD should include reference to the Cambridgeshire and Peterborough Minerals and Waste Development Framework (MWDF), as this is part of Development Plan and must be</p>

considered in planning application(s).

Reference in Guiding principle 33 Sustainable Waste to a temporary waste management facility is for the purposes of recycling material from the clearance of the existing site for reuse where possible. Any material not capable of reuse will be removed from the site. The specific location and access to the facility will be determined through the planning application process.

Renewable technology

The SPD makes reference to exploring the potential for a future energy from waste facility. This is not a requirement.

The SPD also states that any energy facility reliant on waste as a feedstock would require planning permission from the Waste Planning Authority, Cambridgeshire County Council (Guiding Principle 31).

Note the aspirations of Cambridge Without Incineration for innovative energy from waste solutions. Local Plan Policy SS/6 aspires for the new town to incorporate and deliver opportunities to exceed sustainable design and construction standards established by the Local Plan. The SPD provides guidance and flexibility for how this may be achieved, allowing for future improvements in technology. Developers will be required to submit a Energy Strategy alongside their outline planning applications.

Energy efficiency standards

The vision and aspirations set out in the SPD are for the creation of a sustainable, modern and forward thinking development providing opportunities for innovation, and to be one which will celebrate excellence in sustainable development. The SPD requires development to be designed and built in accordance with an energy hierarchy and to incorporate renewable and low carbon technology (guiding principles 30 energy efficiency and 31 renewable and low carbon technology). The Local Plan does not include a policy requirement for all new homes to be net zero carbon emissions. It is not legally possible for an SPD to make new policy or to go significantly beyond the policy approach set out in the Local Plan 2018.

Water recycling centre

The Infrastructure Delivery Plan acknowledges that there is only limited capacity remaining in the Waterbeach Water Recycling Centre (WRC) and that additional capacity has been secured via a connection to the Cambridge Research Park. The scale and location of any new WRC will be determined through a separate planning application process. The SPD is clear that the issue has not yet been finalised and the SPD is not seeking to introduce a decision or position on how the upgrade to the existing foul water

network will be achieved. The planning process for the future location of the Water Recycling Centre is outside the scope of this SPD. It will allow interested parties to engage in the Water Recycling Centre's relocation. The County Council is the Local Planning Authority for waste matters.. This could involve a new water recycling centre.

Notwithstanding, it is noted that the Water Cycle Study 2014 (WCS) referred to by the Environment Agency and forming part of the evidence supporting the Local Plan was endorsed by the Environment Agency and commented to be a very good example of what a WCS should be and that the waste water section was general well written and comprehensive and that the data presented and conclusions drawn were robust and well considered. The WCS identified a preferred option of locating a new WRC east of the site, which recognised its location in flood zone 3. Nevertheless, there will need to be a full and evidenced separate planning process undertaken, having regard to national planning policy at the time of a decision, to consider how additional capacity is provided to serve the new town, but to reiterate, this is a process separate from the SPD.

The importance of providing adequate capacity for waste water treatment will be an important consideration in the phasing and delivery of the new town, and is recognised in the SPD.

Air quality

Air Quality Management Area designation is only required where there are exceedances of national objectives for annual mean nitrogen dioxide and daily mean PM10. SPD Guiding Principle 36 Air Quality outlines measures for mitigating emissions through the design and construction of the new town. Policy SS/6 requires there to be no significant adverse impact on local air quality, and developers will be required to submit a Low Emission Strategy and Sustainability Statement to demonstrate how they have addressed this issue.

Biodiversity

Note the support from The Wildlife Trust to Guiding Principle 34: Integrate and enhance biodiversity, particularly for the approach which bases decisions on a full programme of surveys and monitoring and considers existing and created habitats as part of a wider ecological network.

Agree with the suggestion to amend reference to 'Biodiversity Management Plan' to 'Landscape and Ecological Management Plan' (LEMP), for consistency.

There is no need to remove of 'where possible' from the first bullet in Guiding Principle 29, which recognises there may be wider impacts on the natural environment, not just to biodiversity. Biodiversity is addressed in Guiding Principle 34, and specifically requires appropriate mitigation and enhancement.

Note the support for Table 15 including LEMP in the list of documents / plans and reference in the Mechanism(s) section to management and to applicants being expected to demonstrate that their proposals are capable of delivery.

Policy SS/6 (the parent policy) which the SPD supplements makes no mention of achieving net environmental gains on site. This is because this 'net gains' requirement is set out in the National Planning Policy Framework and does not need to be repeated in the Local Plan or in the SPD. Planning decisions are required by the NPPF to minimise impacts on and provide net gains for biodiversity.

The LEMP will need to demonstrate how impacts on existing and newly created habitats will be mitigated and managed in the short-term as well as the longer-term.

Flood risk

Note the comments from Cambridgeshire County Council in relation to flood risk and concerns from Waterbeach Parish Council concerning potential impact on Wicken Fen and the Cam Washes. The SPD requires the development to incorporate appropriate provision for drainage and will need to ensure on-site and adjoining landowners would not be impacted. To demonstrate this, the developers will need to submit a Flood Risk Assessment and SUDs Strategy with their planning applications.

Waste water recycling

Note the comment from Cambridgeshire County Council concerning the difficulties of delivering a waste water recycling facility. Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms. The Infrastructure Delivery Plan recognises that some capacity can be accommodated through a connection to the Cambridge Research Park. However, a longer-term solution will be needed from the service provider, Anglian Water. Delivery mechanisms such as the Progress and Delivery Group and/or the establishment of a Delivery Company may be able to assist with this process.

Minerals

Agree the SPD should include reference to the Cambridgeshire and Peterborough Minerals and Waste Development Framework (MWDF), as this is part of Development Plan and must be considered in planning application(s).

Table 15 requires applicants to prepare a Sustainability Statement that proposes strategies for addressing relevant sustainability criteria, including construction. This will also need to accord with Local Plan Policy CC/6: Construction Methods.

There is no need to include reference to Construction Environment Management Plan.

Water stress

Waterbeach Parish Council raises concerns that there is no reference to water mains and questioning whether water supply can be guaranteed. The measures listed in Guiding Principle 32 Water Stress are intended to reduce demand on water supplies, not replace the need for water mains supply. Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms. The Infrastructure Delivery Plan recognises there is limited capacity in existing water mains and further water mains will need to be provided by Cambridge Water.

Factual correction – the text as worded is inconsistent with the adopted Local Plan Policy CC/4: Water Efficiency, which refers to ‘water stress’ rather than ‘serious water stress’.

Eco homes / project

It has been suggested that there should be more emphasis on the development of quality ‘green’ housing and that land should be provided for an eco project. The over-arching vision is for the new town to celebrate excellence in sustainable development; with walkable neighbourhoods that encourage active travel; and be innovative, embracing new technology over the period of the development, and its role as a sustainable, well-connected place. The SPD requires development to address the environmental principles of sustainable design and construction and provides flexibility for how this may be achieved. For example, through incorporating measures such as energy and water efficiency, and integration of renewable and low carbon technology.

General comments

Waterbeach Parish Council comments that the sustainability wording is too aspirational and should set standards like BREEAM. Local Plan Policy SS/6 aspires for the new town to incorporate and deliver opportunities to exceed sustainable design and construction standards established by the Local Plan. It is not legally possible for an SPD to make new policy or to go significantly beyond the policy approach set out in the Local Plan 2018.

Waterbeach Parish Council seeks the removal of reference to the provision of enhanced parking for electric cars. The Council does not consider this appropriate at a time when there is a national drive towards electric vehicles. Appropriate charging infrastructure will therefore be required for these vehicles.

Cambridge Past Present and Future suggest the SPD should include requirements for developers in relation to work-related

	<p>activities. The SPD addresses this in Table 15. Guiding Principle 29: Sustainable design and construction requires applicants to prepare a Sustainability Statement that proposes strategies for addressing relevant sustainability criteria, including construction. This will also need to accord with Local Plan Policy CC/6: Construction Methods.</p> <p>The Council disagrees with the assertion that there has been inadequate consideration of impacts on existing village. Key Structuring Element (Fixes) 10: Edge Treatment clearly recognises the need to respect the setting of the existing village. The SPD seeks to integrate the development with the existing community in a way that village residents may benefit from the additional services, facilities and green infrastructure that will be provided. At the same time sustainable design and construction measures are being put in place to mitigate the impacts that may arise from the development.</p>
Proposed Modifications	<p>Add a new section to Appendix 1 to include reference to the Cambridgeshire and Peterborough Minerals and Waste Development Framework (MWDF) and the RECAP Waste Management Design Guide SPD.</p> <p>Guiding Principle 32 Water Stress – amend reference to ‘serious water stress’ to ‘water stress’ for consistency with Local Plan Policy CC/4: Water Efficiency.</p> <p>Guiding Principle 34 – amend reference to ‘Biodiversity Management Plan’ to ‘Landscape Ecology Management Plan’.</p>

Section 6: Delivering the Place

6.1 Overview				
Representations Received	Support: 0	Object: 1	Comment: 5	Total: 6
Main Issues in reps 67577 67563 67496 67429 67555 67626	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • RLW Estates. Document remains reliant on working groups to resolve all key issues and lacks any specific legal obligations framework or commitment to the use of planning conditions to achieve a comprehensive integrated development and a comprehensive movement strategy. <p>Comment</p> <ul style="list-style-type: none"> • Triggers should be changed to ensure the provision of active transport options to support residents from day 1. Figure 34 seems to suggest the first houses will be built along the primary road network. • Natural England. Welcome recognition of the need for the managed delivery of development and related infrastructure to be coordinated, comprehensive and in accordance with Local Plan and SPD. 			

	<ul style="list-style-type: none"> • Historic England. Comment that insufficient information is given to other measures for the area around Denny Abbey, or in relation to phasing and delivery of heritage aspects. • Welcome requirement for military heritage museum and landscaping measures contributing to setting of Denny Abbey. • Note suggestion for allotments/community orchards to north east of main site. Need to avoid built development in this zone. Sheds etc may also be inappropriate. • Insufficient information is given to other measures for area around Denny Abbey. Discussions involved passing over land within immediate setting of Denny Abbey and construction of a new access road to allow site car park to be removed. Vision of linking settlement to Denny Abbey and measures and resources to ensure that development would sustain and enhance site depend on suitable planning obligation - incorporate into SPD. • Suggest additional bullet point under Progress and Delivery Group 'g) to ensure the heritage strategy for the site is implemented'. • Add reference to phasing of delivery of enhancements for Denny Abbey and heritage asset. • Add requirement for a Heritage Statement / Heritage Impact Assessment to accompany any planning application. • Primary objectives of Progress and Delivery Group should also include: to ensure the delivery of the heritage strategy for site. • Could refer to need for high quality design and good practice in relation to public realm. Refer to our regionally specific advice in 'Streets for All East of England'. More information and advice can be found on our website. • Suggest amendments to 'trigger points' for the following, such that active transport is an option from day 1: <ul style="list-style-type: none"> * Improved foot/cycleway from Waterbeach to north of city * Link to Cottenham * Traffic calming and improvements to Waterbeach junctions * A10 junction must be available pre-occupation to keep traffic out of the village • Phase 1 works should include direct access from A10 to the relocated station, to ensure no traffic through village. • Lack of key for Figure 34, and no indication where first houses to be located. If located on primary route, disaster for sustainable transport aspirations. Build closest to village first to build joined up community. • Ambitious walking / cycling target of 50% should be included - Houten achieves 55% non motorised mode share, no reason why Waterbeach shouldn't achieve similar. • WCC are interested in being part of Transport Strategy Review Group. • Lack of reference to construction traffic - it should not be
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	routed through the village but from A10.
Council's Assessment	<p><u>Reliance on working groups</u></p> <p>Working groups can reasonably be expected to play a valuable role in coordinating the delivery of the new town development as they have done in respect of the new settlements of Cambourne and Northstowe. Their role will supplement planning conditions and legal agreements associated with planning applications for the development of the site.</p> <p><u>Natural England's comment</u></p> <p>Note the comment from Natural England that the managed delivery of development and related infrastructure is to be coordinated, comprehensive and in accordance with Local Plan and SPD.</p> <p><u>Phase 1</u></p> <p>The SPD already recognises the need for provision of infrastructure for active travel and public transport in phase 1 to enable sustainable movement from day one. This also includes links to destinations outside of the new town such as Waterbeach village, Cambridge Research Park and the north of the city.</p> <p>It is important to provide vehicular access from A10 in phase 1 of the development to service the new community, provide access to the new station and avoid the need for traffic, including construction traffic, to route through the village.</p> <p>Phase 1 will include necessary improvements to the A10 to accommodate the additional traffic, particularly the junctions. In addition, traffic calming is proposed in the village as part of the improvements to cycling and walking routes to the new station, and to deter traffic from routing via Horningsea.</p> <p>Figure 34 shows an indicative location of development within phase 1. This is focussed on land closest to the village, around the new town centre and along the route to the station, as these reflect the focal points around which to establish the new community in the shorter term. However, the SPD makes clear that the overall delivery of infrastructure and phasing of the development will be overseen by the Council, working with the landowners / promoters.</p> <p><u>Target for mode share</u></p> <p>The draft SPD aspires to create a community where it is easy to move around in an environment where active travel and public transport are the norm. This reflects Local Plan Policy SS/6 (the parent policy). No specific targets for sustainable travel are included in Policy SS/6. It is not legally possible for an SPD to make new policy or to go significantly beyond the policy approach set out in the Local Plan 2018.</p>

Transport Strategy Review Group

Note the Waterbeach Cycle Campaign's interest in being part of Transport Strategy Review Group. It is intended that the Transport Strategy Review Group would include representatives of the Councils, each landowner / promoter, and other key stakeholders.

Construction traffic

Appendix 1: Local Policy Context provides a summary of the Local Plan policy requirements which apply to the Waterbeach site. Policy CC/6: Construction Methods requires construction traffic to be routed to avoid roads passing through villages, and developers are required to submit supporting evidence with their planning application to demonstrate how this will be achieved.

Historic England's comments

Note the comment welcoming the requirement for military heritage museum and landscaping measures contributing to setting of Denny Abbey.

Note the desire to avoid built development at the allotments / community orchards if they are located in the vicinity of Denny Abbey.

The SPD recognises the importance of the setting of Denny Abbey, in providing the context for the new town. The importance and setting of Denny Abbey and other heritage assets is a key issue for the SPD (see Key Issue 5 Managing a sensitive historical setting) and forms one of the Key Structuring Element (Fix) (see Fix 5 Denny Abbey setting).

The Infrastructure Delivery Plan includes the delivery of landscaping measures contributing to the setting of Denny Abbey early within the development to allow for trees to grow. Other enhancements to heritage assets will come about as part of wider works to provide open space, SUDS and greenways which are phased throughout the development, with the Causeway Link required pre-occupation.

Whilst discussions have been held in relation to passing over land within the immediate setting of Denny Abbey to realise wider aspirations and vision for the site, it is not within the scope of the SPD.

Key structuring element (fix) 5 Denny Abbey Setting requires development proposals to be accompanied by a Heritage Statement and Heritage Management Plan. These should set out its significance and how the proposed development has responded to this, and enhances the setting (see Table 8).

It is not necessary to broaden the objectives of the Progress and Delivery Group. Bullet (e) recognises the need for a collaborative

	<p>approach to ongoing design evolution for the development site and phasing proposals, which will by association consider impacts on heritage assets and other issues such as biodiversity.</p> <p>The suggestion that the SPD could refer to the need for a high quality of design is unnecessary as this is a central strand which runs through all planning policy, from the NPPF, Local Plan (Policy HQ/1 Design Principles) and this SPD.</p>
Proposed Modifications	No modifications are proposed in response to representations on section 6.1 Overview

6.2 Infrastructure Delivery Plan (IDP)				
Representations Received	Support: 0	Object: 16	Comment: 14	Total: 30
Main Issues in reps 67287 67353 67546 67332 67581 67290 67321 67397 67548 67599 67569 67430 67523 67333 67381 67603 67434 67350 67368 67403 67505 67606 67352 67456 67632 67538 67534 67592 67618 67515	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> • Waterbeach Parish Council want the SPD to specify that the new Water Treatment Works should not be placed within 1,000m of recreational facilities such as River Cam or Parks. Conditions should be imposed and proven to be met before work commences on every phase of development. The Parish Council should be consulted prior to any traffic calming measures being considered. • All construction traffic including to the new station should be from the A10 and not through the existing village including Bannold Road and Cody Road. • Intra and inter town cycle routes are more important than the A10 upgrade. • Implement transport infrastructure improvements before building out large areas of the town including environmentally friendly cycle routes. • RLW Estates consider the IDP to be a working document and not prescriptive. Reference to improved public transport link to Cambridge from Waterbeach" in the form of a "congestion free bus link" needs to be subject to review in the light of the potential of the relocated station and other sustainable transport measures to achieve the necessary modal shift. • Not clear why the Park and Ride at the A10 is to be funded by S106 and the rail based Park and Ride by direct funding. • Provision of foot/ cycle crossing from site to Cambridge Research Park (CRP)" it is not clear why RLW is listed within the "land holding" column. Items that refer to A10 junction northern and southern access points should prioritise the provision of the southern A10 access. • New water recycling centre is the preferred solution of Anglia Water and should be specifically included in the IDP. • Specific triggers of numbers of homes specified for community facilities are too specific at this stage. 			

- A more definite and binding framework must be established in this SPD to secure comprehensive development and comprehensive movement.
- A sustainable new town will need a police station and fire station and places of worship.
- The traffic calming and improvements to junctions within Waterbeach village, on page 121 need to be delivered pre-occupation. It is important that the A10 junction (southern access) road on page 122 is delivered pre-occupation.
- No mention of what shops and businesses will be provided.
- Physical and social infrastructure must be secured through s106 agreements to which Waterbeach Parish Council are a party. More detail needed on timescales before the applications can be determined, and on the community hubs, and sports and library provision.
- **Waterbeach Parish Council** state that there will be pressure on village facilities before triggers require provision in new town. Request S106 cover costs of new town residents using village facilities before new town facilities are in place.
- A health centre needs to be provided at a very early stage.
- SPD should mention air quality especially in context of Amey. Amey needs to comply with its permits.
- The Park and Ride must serve the village.
- The cycle/foot link to Cambridge has a vague trigger. The timing of the provision of these strategic cycle links is not clear. Should be provided from first occupation.
- Moving the station will not reduce car use and moving it before 2025 will be counter productive.
- The Transport Strategy Review Group (page 122) should include village representatives including the Parish Council and Neighbourhood Plan Group.
- A10 northern junction trigger should be 'before the start of construction' to help avoid construction traffic through the village.

Comment

- **Anglian Water** support the development in principle and the proposals in the SPD. It is required to provide waste water treatment services for the new development. There is limited further capacity within the current Water Recycling Centre ("WRC") at Waterbeach and given this and the estimated delivery time for new housing there is a need to develop an overall waste water drainage strategy.
- Anglian Water have engaged with all stakeholders in the development of this drainage strategy. The most favourable solution to the limited further capacity at the WRC has been the construction of a new works on a relocated site of approximately 10-15 acres. The statement made on page 125 of the SPD regarding the delivery strategy is correct in that it identifies the current

	<p>further available capacity at the WRC to be approximately 500 extra dwellings and that there is the possibility to connect, on a temporary basis, to the Research Park to allow drainage for a further (approximate) 900 units.</p> <ul style="list-style-type: none"> • Anglian Water are developing a further option to provide waste water drainage whilst a new works is being constructed. Capacity for a further 750 dwellings will be achieved by diverting, via a new pipeline, the existing discharge point at the WRC from the Bannolds drove IDB controlled drain, to a new discharge point in the River Cam where there is much greater dilution than the current discharge point. Both U&C and RLW have been working with Anglian Water to ensure that capacity is available in the waste water network. The new water recycling centre is required within the next Asset Management Period (2019-2024). As detailed above, there are 3 options available to provide extra waste water drainage for the planned development whilst the new water recycling centre is in construction. • It is critical to Anglian Water to understand the number of dwellings the new water recycling centre must be designed to accommodate. Anglian Water require a degree of certainty about these numbers to ensure the correct design horizons and the appropriate funding from Ofwat at the appropriate time. If the estimates are incorrect, Anglian Water could be over sizing a waste water recycling centre or delivering a works before it is needed. The most accurate number of dwellings and their estimated delivery date should be included within the SPD to establish the correct need date and the correct overall waste water drainage strategy. If this is not possible, a restricted number of properties should be permitted within a defined phasing programme. • Anglian Water wish to ensure that water re-use and SUDS schemes are promoted wherever possible within the SPD. Anglian Water would wish to see more details of how the two developers can deliver these options reflected within the SPD. • Cambridge Past Present and Future want the SPD to include a requirement for the new town to mitigate or compensate for the impacts of increased visitor numbers on countryside sites such as Wicken Fen and the Milton Country Park or help fund new sites such as the Sporting Lakes. • Ensure early provision of improved transport links to Landbeach so that villagers can benefit from the new town facilities. • Green-way link to Cambridge and new station should be required before over 3000 homes are developed, to ensure cycling becomes embedded as a main transport option to Cambridge. • National Grid comment that no high voltage electricity assets or high pressure gas pipelines in the Waterbeach SPD area.
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	<ul style="list-style-type: none"> • Transport infrastructure including cycle links need to be provided and improved from the start of development particularly links to Cottenham. The road to the new station needs to be provided at the beginning of the project. • The National Trust comment that The SPD should endorse the use of the Natural Cambridgeshire Local Nature Partnership's (LNP) Developing with Nature Toolkit in the design and delivery of multi-functional habitats at Waterbeach. • The Wildlife Trust state that it is not clear from the infrastructure delivery plan and table how the habitat creation and enhancement measures, and the design of the North Park Strategic Landscape area will be implemented and long-term management secured. It is not clear from the SPD who will be providing these spaces, nor how they will be managed in perpetuity. The SPD needs to identify a solution or range of potential solutions, that can be delivered by U&C and RLW jointly. This needs to be set out within the Infrastructure Delivery Programme and included in the S106 agreement. • The new town needs a arts and cultural venue. Existing village has several arts organisations. • Improve the A10 first.
<p>Council's Assessment</p>	<p><u>Waste water treatment services</u></p> <p>The Infrastructure Delivery Plan acknowledges that there is only limited capacity remaining in the Waterbeach Water Recycling Centre (WRC) and that additional capacity has been secured via a connection to the Cambridge Research Park. The scale and location of any new WRC will be determined through a separate planning application process.</p> <p>Note the comments from Anglian Water that they have engaged with stakeholders, including the two site promoters, in the development of a Waste Water Drainage Strategy to understand and best meet the needs of the new community.</p> <p>There SPD contains a number of references to SUDs schemes, including section 5.6 Sustainable Drainage. Water reuse is addressed in section 5.8 Environmental Sustainability and Climate Change, under the section on Water Stress. Both are also included in the Infrastructure Delivery Plan.</p> <p><u>Construction traffic</u></p> <p>Appendix 1: Local Policy Context provides a summary of the Local Plan policy requirements which apply to the Waterbeach site. Policy CC/6: Construction Methods requires construction traffic to be routed to avoid roads passing through villages, and developers are required to submit supporting evidence with their planning application to demonstrate how this will be achieved.</p> <p><u>Transport provision</u> Cyleways:</p>

The SPD has a clear vision to create a well connected place which is easy to move around in an environment where active travel is the norm. It is clear that cycle provision is expected early in the development of the new town. Section 6.4 Development Phasing explicitly references the need for footpaths and cycleways to be provided within the first phase of development as these are priority modes of movement. The Infrastructure Delivery Plan requires cycle links within the development pre-occupation, although the provision of wider routes will be determined through the Transport Assessment process.

Park and Ride:

Two Park and Ride facilities have been identified in the SPD, one located adjacent to the A10 and the other adjacent to the relocated railway station. Villagers will be able to access either through a network of direct walking and cycling routes. In addition, the new town will be served by high quality public transport, and the SPD states that routes should serve the town as well as connecting with Waterbeach village. This will provide existing residents with access to improved and direct public transport services compared to those that currently exist.

Railway station:

The SPD is clear that the new and relocated railway station should be delivered in the early stages of the development of the new town to help ensure the availability of sustainable travel choices. It is the subject of a separate planning process and has now received planning permission.

Highways:

Within the context of prioritising non-motorised modes, Guiding Principle 6 seeks to minimise impact on the surrounding highway network, including the A10. A multi modal study for the A10 corridor has recommended a package of measures to accommodate the transport needs of the new town, including upgrading the capacity of the A10 and measures to discourage through traffic in local villages. The Infrastructure Delivery Plan identifies short term improvements to the A10 junctions and wider capacity improvements, with timing of delivery to be determined through the Transport Assessment. It also includes traffic calming both within the village (to be agreed with the Parish Council) and in nearby villages.

Infrastructure delivery plan

The Infrastructure Delivery Plan provides guidance on the infrastructure requirements for the new town, who is responsible for its provision and the phasing and triggers points for its delivery. This is to provide certainty to all parties for the type and nature of infrastructure required to secure a comprehensive development.

However, the specific requirements or triggers may be dependent upon the detailed design for the new town, and will be determined through supporting evidence submitted with the planning applications. In addition, due to the timescales involved in delivering a new town (potentially over 20 years) it also provides flexibility to enable it to respond to changing circumstances.

Transport:

The Infrastructure Delivery Plan at page 120 should refer to both the Park and Ride at the A10 and the rail based Park and Ride being subject to direct developer funding.

Access from the A10 via the northern access is required pre-occupation in order to serve Phase 1 of the development. It will also serve construction of the new railway station, to keep traffic out of the village. The provision of the southern access will be determined through the Transport Assessment process and will be delivered when it is required to serve the new station and/or certain phases of the development.

The Infrastructure Delivery Plan, in the row for "Provision of foot / cycle crossing from site to Cambridge Research Park" erroneously refers to RLW in the "land holding" column. This should be corrected.

Transport Strategy Review Group:

It is intended that collaborative working arrangements will be put in place between the Councils, representatives of each landowner / promoter, and other key stakeholders, such as the Parish Council and Neighbourhood Planning Group.

Community and health uses:

It is important that community and health uses are developed alongside housing to ensure adequate provision in a timely manner to help to create a balanced and sustainable community and avoid impacting on nearby services and facilities, many of which are already oversubscribed. The SPD provides flexibility for how these may be delivered and may include through the co-location of compatible services to enable practical and cost efficiency savings, and/or provision and use of interim facilities from first occupation until permanent facilities are delivered.

Emergency services:

Provision for emergency services such as police and fire services, and faith services are included in the Infrastructure Delivery Plan. Whilst the SPD will ensure that appropriate retail, service and business space will be provided, the land use planning process cannot dictate which companies will operate the buildings.

Arts and Culture:

The new town centre will provide facilities for arts and culture, as referenced in Section 4.2 Key Structuring Elements (Fixes) 1 Hierarchy of Centres. Agree that this should be specifically referenced in the Infrastructure Delivery Plan.

Impact on Wicken Fen:

Provision will be made for both informal and formal open space to address the recreational needs of the new community. The large scale of the strategic landscaped area around Denny Abbey (approximately 2km or 1.2 miles by 1.5 km or 0.9 miles) will help to mitigate any potential recreational impacts on Wicken Fen. Walking from east to west across this area would take around 25 minutes at an easy pace. Further on-site provision of green spaces can be found along the many greenways to be provided and along green edges at Car Dyke, the South park and the Fenland Edge along which will run the 'Bounds' recreational route.

S106

Section 6.7 Delivery Options outlines how the Council will use appropriate planning conditions and S106 agreements to mitigate the impacts of the proposed development and help to secure the relevant delivery of site wide development and infrastructure. The Infrastructure Delivery Plan provides further information, and sets out how physical and social infrastructure will be provided, whether direct or via S106. It is intended that collaborative working arrangements will be put in place between the Councils, representatives of each landowner / promoter, and other key stakeholders, such as the Parish Council.

Air quality

Guiding Principle 36 addresses Air Quality and makes specific reference to the Amey Cespa Waste Management Park to the north west of the site. Compliance of existing land uses outside the Waterbeach new town site is not an issue for the SPD, it is a matter for planning enforcement.

Biodiversity

A requirement to integrate and enhance biodiversity is set out in Guiding Principle 34. Local Plan Policy SS/7 specifically requires a full programme of ecological surveys and monitoring to guide production of a Biodiversity Management Plan (BMP). In addition developers will be required to provide supporting evidence with their planning applications to demonstrate that their proposals are capable of delivery and how impacts on existing and newly created areas will be mitigated and managed in the longer-term.

Agree the SPD should endorse the use of the Natural

	<p>Cambridgeshire Local Nature Partnership's (LNP) Developing with Nature Toolkit. Add reference to the Toolkit in Table 15</p> <p><u>Infrastructure</u></p> <p>Note the comment from National Grid that there are no high voltage electricity assets or high pressure gas pipelines in the Waterbeach SPD area.</p>
Proposed Modifications	<p><u>Infrastructure Delivery Plan</u> – in the row for “Provision of foot / cycle crossing from site to Cambridge Research Park” remove reference to RLW in the “Land holding” column.</p> <p><u>Infrastructure Delivery Plan</u> – include a new row for the provision of arts and cultural facilities. <i>Heading:</i> Arts and Culture <i>Description:</i> Creation of arts and cultural capacity in the town centre area whether through co-location with another community facility or school or through the provision of a single dedicated hub. <i>Provider/partner:</i> Various-dependent on occupier <i>Triggers:</i> to be determined <i>On/off site:</i> On-site <i>Land holding:</i> Likely to be in town centre, therefore Urban and Civic <i>Funding:</i> s106 <i>Mechanism:</i> Single access agreement if co-located in hub, or via a community access agreement</p> <p><u>Table 15</u> – Principle 34 ‘Integrate and enhance biodiversity’ – include reference to the Natural Cambridgeshire Local Nature Partnership's (LNP) Developing with Nature Toolkit.</p> <p><u>Infrastructure Delivery Plan</u> page 120 - Amend the Waterbeach Park and Ride funding mechanism text to delete reference to ‘s106’ and add reference to ‘Direct Funding’.</p>

6.3 Approaches to Delivery				
Representations Received	Support: 0	Object:1	Comment:2	Total:3
Main Issues in reps 67629 67354 67578	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> Waterbeach Parish Council state that the train station should not move until 1500 homes are delivered. The SPD is not clear when supporting infrastructure will be delivered or funded. It is not clear how conditions / s106 agreements will be monitored. How construction traffic will be managed. What enforcement actions will be implemented. <p>Comment</p> <ul style="list-style-type: none"> There is no mention in the SPD of routing of construction traffic for the development. All construction vehicles need 			

	to be routed through the development site directly from the A10 - both for the U&C and RLW developments and not through the existing village.
Council's Assessment	<p>The SPD is clear that the new and relocated railway station should be delivered in the early stages of the development of the new town to help ensure the availability of sustainable travel choices. It is the subject of a separate planning process and has now received planning permission.</p> <p>Chapter 6: Delivering the Place provides guidance on the achievement of a comprehensive development and provides considerable detail on the infrastructure requirements across the development as a whole. The Infrastructure Delivery Plan sets out who will provide the infrastructure and seeks to ensure the necessary infrastructure is provided in a timely way, including the provision of some critical infrastructure upfront.</p> <p>The developers will be required to submit information with their planning applications specifically for monitoring and review purposes. The Council will monitor the implementation of the SPD in an Annual Monitoring Report. If any issues are identified, this will be reported together with an explanation and proposed remedial steps.</p> <p>Appendix 1: Local Policy Context provides a summary of the Local Plan policy requirements which apply to the Waterbeach site. Policy CC/6: Construction Methods requires construction traffic to be routed to avoid roads passing through villages, and developers are required to submit supporting evidence with their planning application to demonstrate how this will be achieved.</p>
Proposed Modifications	No modifications are proposed in response to representations on section 6.3 Approaches to Delivery

6.4 Development Phasing				
Representations Received	Support: 0	Object: 3	Comment: 1	Total: 4
Main Issues in reps 67271 67364 67431 67627	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> On page 141 the phasing plan is too woolly. U&C want to start in the North and RLW in the East. It needs to be prescriptive, so that both developers start their housing in Phase 1 close to one another, and first residents can all use one school, to foster community cohesion from the start. Pressure on existing village facilities during the initial phases of developments. RLW Estates consider that the SPD does not provide clear guidance on phasing. Without clear guidance on phasing and a framework for appropriate legal obligations and related conditions, applications could be approved that only achieve a limited and isolated first phase development with no obligation or commitment to 			

	<p>delivering the remainder of the allocation. First phases should include development around station and town centre. Needs more balanced approach.</p> <p>Comment</p> <ul style="list-style-type: none"> The first houses should be built close to the existing village. This will help to form a joined-up community, rather than resulting in 'us and them' mentality if developments were separate, and will provide local shops and pubs with more business.
Council's Assessment	<p>The SPD (in Chapter 6: Delivering the Place) provides guidance on the achievement of a comprehensive development and provides considerable detail on the infrastructure requirements across the development as a whole. The Infrastructure Delivery Plan seeks to ensure the necessary infrastructure is provided in a timely way, including the provision of some critical infrastructure upfront. Within this context the SPD acknowledges the importance of achieving a well connected, sustainable settlement, achieving comprehensiveness and importantly avoiding potential isolation and poorly serviced development, particularly in the early years.</p> <p>To this end, the SPD requires the first phases of the development to be a location(s) that can be served by access from the A10 and the new primary route, as well as providing development to provide sustainable movement options and supportive connections with Waterbeach village. The SPD is also clear that this issue will need further consideration as part of the planning application process and that a site wide strategy should be established via collaborative discussions with the site promoters and the Councils.</p>
Proposed Modifications	No modifications are proposed in response to representations on section 6.4 Development Phasing

6.5 Monitoring, Review and Implementation				
Representations Received	Support: 0	Object: 7	Comment: 1	Total: 8
Main Issues in reps 67591 67619 67628 67432 67383 67507 67404 67376	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> A non-motorised mode share target of 50% should be added to this section, with monitoring, review and implementation actions to be carried out to ensure that this target is met. Cambridge Cycling Campaign state that the development should seek to achieve for short-to-medium distance trips at least 50% mode share for active travel modes, and in the longer run strive to achieve 70% active travel mode share for such trips. How will construction traffic be monitored and managed throughout the construction phase to ensure that the communities in the parish of Waterbeach are not affected? 			

	<ul style="list-style-type: none"> • Process needed to make the developers work together. • RLW Estates state that the Council can and should act to neutralise any ransom position which either U&C or RLW might seek to apply to the principle of movement across land ownership boundaries within the strategic site boundary. SPD should require that any ransom position be considered through the viability assessments of all planning applications submitted in pursuance of the Local Plan allocation. • Unclear from the SPD when and how infrastructure will be delivered. Strategy should be in place now within the SPD. How will conditions/enforcement be monitored and managed due to SCDC's lack of resource? Should a financial viability SPD be completed to ensure the site is viable and sustainable? Will the cost of land affect the delivery of affordable housing? <p>Comment</p> <ul style="list-style-type: none"> • A non-motorised mode share target of 50% should be added to this section, with monitoring, review and implementation actions to be carried out to ensure that this target is met.
<p>Council's Assessment</p>	<p><u>Target for mode share</u></p> <p>The draft SPD aspires to create a community where it is easy to move around in an environment where active travel and public transport are the norm. This reflects Local Plan Policy SS/6 (the parent policy). No specific targets for sustainable travel are included in Policy SS/6. It is not legally possible for an SPD to make new policy or to go significantly beyond the policy approach set out in the Local Plan 2018.</p> <p><u>Monitoring</u></p> <p>The developers will be required to submit information with their planning applications specifically for monitoring and review purposes. The Council will monitor the implementation of the SPD in an Annual Monitoring Report. If any issues are identified, this will be reported together with an explanation and proposed remedial steps.</p> <p><u>Ransom</u></p> <p>See the substantive response at page 53.</p> <p><u>Construction traffic</u></p> <p>Appendix 1: Local Policy Context provides a summary of the Local Plan policy requirements which apply to the Waterbeach site. Policy CC/6: Construction Methods requires construction traffic to be routed to avoid roads passing through villages, and developers are required to submit supporting evidence with their planning application to demonstrate how this will be achieved.</p>

	<p><u>Infrastructure delivery & viability</u></p> <p>Due to the timescales involved in delivering a new town, potentially over 20 years, the SPD provides a comprehensive plan for the whole site and outlines vital infrastructure and facilities required to create a successful settlement. The Infrastructure Delivery Plan (see Section 6.2) outlines the infrastructure requirements, and how these can be funded and secured as part of the development management process. Viability testing will be undertaken and reviewed to ensure the development is deliverable and viable.</p>
Proposed Modifications	No modifications are proposed in response to representations on section 6.5 Monitoring, Review and Implementation

6.7 Delivery Options				
Representations Received	Support: 0	Object: 1	Comment: 0	Total: 1
Main Issues in reps 67377	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> Without legally binding agreements there is the potential of the strategic site not being delivered as per the local plan and therefore not meeting the requirements of the local plan. <p>Comment</p>			
Council's Assessment	Section 6.5: Monitoring, review and implementation addresses these issues. The developers will be required to submit information with their planning applications specifically for monitoring and review purposes. The Council will monitor the implementation of the SPD in an Annual Monitoring Report. If any issues are identified, this will be reported together with an explanation and proposed remedial steps, which may include mechanisms outlined in Section 6.3: Approaches to Delivery.			
Proposed Modifications	No modifications are proposed in response to representations on section 6.7 Delivery.			

Appendix 1 Local Policy Context				
Representations Received	Support: 0	Object:1	Comment:2	Total:3
Main Issues in reps 67369 67457 67547	<p>Support</p> <p>Object</p> <ul style="list-style-type: none"> No construction traffic should be permitted to access the site through the village of Waterbeach. <p>Comment</p> <ul style="list-style-type: none"> How do we ensure this development is used to meet local housing needs and not promoted to Londoners as a commuter town? Cambridge Past present and Future comment that the 			

	SPD should be updated to reflect the adopted Local Plan (delete 'draft') and also the newly revised NPPF 2018.
Council's Assessment	<p><u>Construction traffic</u></p> <p>Appendix 1: Local Policy Context provides a summary of the Local Plan policy requirements which apply to the Waterbeach site. Policy CC/6: Construction Methods requires construction traffic to be routed to avoid roads passing through villages, and developers are required to submit supporting evidence with their planning application to demonstrate how this will be achieved.</p> <p><u>Updating</u></p> <p>The draft SPD was published for consultation prior to the adoption of the Local Plan and was factually correct at that time. Text in the SPD will be updated to ensure references to the Local Plan are updated and includes any other factual updating as necessary prior to adoption.</p> <p>Local Plan Policy SS/6 (the parent policy) has been adjudged to be consistent with the NPPF published in 2012. SPD cannot introduce new policy therefore it is not appropriate for the SPD to draw on NPPF 2018.</p> <p><u>Local housing needs</u></p> <p>The Local Plan was required to assess and plan for sufficient housing to address local housing needs. It allocates sites to provide the numbers of houses required, including the new town at Waterbeach, and includes policies to influence the type and mix of housing to be provided on these development sites (i.e. in terms of the provision of affordable housing and houses of different types sizes). The SPD provides additional guidance on the housing to be provided in Waterbeach in Section 4.2 Key Structuring Elements (Fixes), sub-section 11 Amount Density and heights. These factors influence the type of provision and character of the place and, in turn, the people who are likely to want to live in such a community. With the exception of being able to control who is eligible for affordable housing, there are no controls on houses sold on the open market.</p>
Proposed Modifications	Update references to 'draft' or 'emerging' Local Plan to 'adopted' Local Plan and other factual updating including ensuring all the policy numbers are consistent with the adopted Local Plan 2018.

Appendix 2 List of Acronyms				
Representations Received	Support: 0	Object: 0	Comment:1	Total:1
Main Issues in reps 67497	Support Object Comment			

	<ul style="list-style-type: none"> Historic England suggest the use of the term Scheduled Monument rather than Scheduled Ancient Monument given that a wide range and age of monuments are scheduled. This is in line with the terminology used in the NPPF.
Council's Assessment	The SPD text refers to Scheduled Monument, consistent with the terminology used in the NPPF, with the exception of the key to Figure 11 and the list of acronyms in Appendix 2. These references should be corrected.
Proposed Modifications	<p><u>Appendix 2</u> Amend the entry for "SAM Scheduled Ancient Monument" to read SM Scheduled Monument".</p> <p><u>Figure 11</u> Amend the key for Figure 11 to refer to 'Scheduled Monument.</p>

Habitat Regulation Assessment (HRA)				
Representations Received	Support:	Object:1	Comment:1	Total:2
Main Issues in reps 67524 67564	Support Object <ul style="list-style-type: none"> The Wildlife Trust have concerns over potential impacts on Wicken Fen due to increased recreational pressures as have the National Trust who manage the site. Query assumptions made in the HRA. the Local Plan HRA was prepared with reference to the local plan allocation for 8-9000 homes, and not the 11,000 homes being put forward by the two submitted planning applications Comment <ul style="list-style-type: none"> Natural England are generally satisfied with the HRA but outline areas of mitigation to address effects of increased recreational pressures on Wicken Fen. Do not agree consideration of these pressures can be left to the detailed planning application stage. Under precautionary principle HRA should conclude significant effect likely and proceed to Appropriate Assessment. Planning applications are for 11,000 homes, many more than the Local Plan allocation for 8,000-9,000 homes. Section 3.4.3 of the HRA Screening Report is not correct to note that access to Wicken Fen is by permit only. Access by PROW possible and continues to grow. National Trust having to commit additional resources to site management. 			
Council's Assessment	It is a requirement under the Habitats Directive that the potential effects of "plans or projects" on designated European sites (Special Areas of Conservation / Special Protection Areas/RAMSAR site), alone or in combination with other proposals, are also considered, and where necessary are subject to Appropriately Assessment.			

The first stage in deciding whether an SPD also requires preparation of an SEA or an Appropriate Assessment is the preparation of screening reports. Such reports have been prepared in respect of the Waterbeach New Town Draft Supplementary Planning Document (SPD). The Council is required to consult specified consultation bodies on such reports - Historic England, Natural England and the Environment Agency, but it remains the responsible authority for ensuring that the potential effects of the new town have been considered appropriately.

The responses of the consultation bodies to the Sustainability Appraisal and Habitats Regulations Assessment Screening Reports were received on the 22nd and 24th August 2018 and were taken into consideration by the Council in agreeing the SPD for consultation, including refining some of the wording of the SPD SA screening report and to making an amendment to the draft SPD itself for clarification in response to the earlier responses.

The consultation bodies have made representations to the SPD consultation along similar lines to the views previously received. The Wildlife Trust makes similar comments.

In regard to the natural environment, the potential effects of the new town have been considered through the HRA and SA of the Local Plan in which both reports conclude there would be no likely significant effects. The response from Natural England acknowledges this but comments that *'in light of new evidence becoming available since the preparation of the Local Plan SA, uncertainties may remain with regard to the effects of recreational pressure at Wicken Fen and the Cam Washes'*.

Natural England do not specify the 'new evidence' but these may relate to detailed information contained within and arising from the two major planning applications for the site from U&C and RLW, where comments by Natural England are seeking additional information from the applicants for planning permission and an agreed approach to off-site mitigation measures to address any long-term residual impacts of additional recreational pressure. These are a matter directed and for consideration as part of the planning application process and it is possible as a matter of principle that this more detailed stage in the planning process could identify impacts that were not identified at the plan making stage. These specific comments made to the planning applications by Natural England will be for consideration through the determination process.

The Local Plan SA and its HRA provide an appropriate level of assessment for a strategic policy document. In this regard it can be noted that Natural England supported the allocation of the new town site at pre-submission Local Plan stage and made no objections to the SA or HRA of the plan so played no part in the Local Plan examination hearings into the soundness of the Local

	<p>Plan.</p> <p>The evidence underpinning the Local Plan policy SS/5 for the new town did not identify any such impacts requiring mitigation and so the policy makes no reference to such mitigation being necessary. The SA and HRA of the Local Plan took account of potential recreational impacts arising from the new town proposal and did not identify any likely significant effects either alone or in combination. The SPD provides further guidance to the Local Plan and it is considered that it does not in itself identify or give rise to any new proposals or impacts on either European Protected sites or other designated nature conservation interests such as to requiring SEA or Appropriate Assessment. It follows that the issues raised by Natural England in response to the SPD screenings are appropriately addressed through the planning application process and the Environmental Impact Assessments (EIA) of the U&C and RLW planning applications.</p> <p>Note the correction concerning access by PROW to the Wicken Fen site.</p> <p>Having given careful consideration to the comments received through the SPD consultation, the conclusions of the HRA Screening remain sound.</p>
Proposed Modifications	No modifications are proposed in response to representations on the Habitat Regulation Assessment

Sustainability Appraisal / Screening Report				
Representations Received	Support: 0	Object: 0	Comment: 2	Total: 2
Main Issues in reps 67565 67498	<p>Support</p> <p>Object</p> <p>Comment</p> <ul style="list-style-type: none"> • Natural England identify areas of mitigation to address effects of increased recreational pressure. • Uncertainties remain in regard to possible effects on Wicken Fen due to increased recreational pressure which should be addressed in the SPD and an SA prepared. • SA screening conclusion contrary to advice of all statutory environmental consultees. • Historic England SA screening conclusion contrary to advice of all statutory environmental consultees. Large scale development with potential impacts on assets of high significance. An SA should be prepared. 			
Council's Assessment	Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so "with the objective of contributing to the achievement of sustainable			

development". Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues.

Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a Strategic Environmental Assessment (SEA) for example if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the Local Plan.

The first stage in deciding whether an SPD also requires preparation of an SEA or an Appropriate Assessment is the preparation of screening reports. Such reports have been prepared in respect of the Waterbeach New Town Draft Supplementary Planning Document (SPD). The Council is required to consult specified consultation bodies on such reports - Historic England, Natural England and the Environment Agency, but it remains the responsible authority for ensuring that the potential effects of the new town have been considered appropriately.

The responses of the consultation bodies to the Sustainability Appraisal and Habitats Regulations Assessment Screening Reports were received on the 22nd and 24th August 2018 and were taken into considered by the Council in agreeing the SPD for consultation, including refining some of the wording of the SPD SA screening report and to making an amendment to the draft SPD itself for clarification in response to the earlier responses.

The consultation bodies have made representations to the SPD consultation along similar lines to the views previously received.

Historic England considers that a Strategic Environmental Assessment (SEA) of the SPD is required because of the scale of the new town development. However the principle of the new town development and the parameters of the development in terms of scale have been considered through the SA and HRA Assessment of the Local Plan and the role of the SPD is to provide a framework to assist the implementation of the Local Plan. The SPD does not prescribe or change the scale parameters of the development which is set out in the Local Plan policy SS/5 as approximately 8,000 to 9,000 dwellings. The SPD at pages 65-66 considers the issue of dwelling capacity and explicitly does not endorse or otherwise comment on the acceptability of the 11,000 dwelling capacity that is provided within the two major planning applications for the development of the site from U&C and RLW. The SPD stating that *'It will be for the planning application process to test specific proposals contained in the planning applications in the context of the Local Plan policy, and this will determine the number of dwellings that can appropriately be accommodated on the site whilst achieving a high quality sustainable new community that makes best use of land'*. It follows that in terms of scale the SPD does not give rise

	<p>to any significant matters that were not considered through the Local Plan SA and HRA process.</p> <p>In regard to the natural environment, the potential effects of the new town have been considered through the HRA and SA of the Local Plan in which both reports conclude there would be no likely significant effects. The response from Natural England acknowledges this but comments that <i>'in light of new evidence becoming available since the preparation of the Local Plan SA, uncertainties may remain with regard to the effects of recreational pressure at Wicken Fen and the Cam Washes'</i>.</p> <p>Natural England do not specify the 'new evidence' but these may relate to detailed information contained within and arising from the two major planning applications for the site from U&C and RLW, where comments by Natural England are seeking additional information from the applicants for planning permission and an agreed approach to off-site mitigation measures to address any long-term residual impacts of additional recreational pressure. These are a matter directed and for consideration as part of the planning application process and it is possible as a matter of principle that this more detailed stage in the planning process could identify impacts that were not identified at the plan making stage. These specific comments made to the planning applications by Natural England will be for consideration through the determination process.</p> <p>The Local Plan SA and its HRA provide an appropriate level of assessment for a strategic policy document. In this regard it can be noted that Natural England supported the allocation of the new town site at pre-submission Local Plan stage and made no objections to the SA or HRA of the plan so played no part in the Local Plan examination hearings into the soundness of the Local Plan.</p> <p>The evidence underpinning the Local Plan policy SS/5 for the new town did not identify any such impacts requiring mitigation and so the policy makes no reference to such mitigation being necessary. The SA and HRA of the Local Plan took account of potential recreational impacts arising from the new town proposal and did not identify any likely significant effects either alone or in combination. The SPD provides further guidance to the Local Plan and it is considered that it does not in itself identify or give rise to any new proposals or impacts on either European Protected sites or other designated nature conservation interests such as to requiring SEA or Appropriate Assessment. It follows that the issues raised by Natural England in response to the SPD screenings are appropriately addressed through the planning application process and the Environmental Impact Assessments (EIA) of the U&C and RLW planning applications.</p> <p>Having given careful consideration to the comments received through the SPD consultation, the conclusions of the SA Screening remain sound.</p>
Proposed	No modifications are proposed in response to representations on

Modifications	the Sustainability Appraisal / Screening Report
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