

RLW WATERBEACH NEW TOWN EAST PLANNING APPLICATION

To: Economy and Environment Committee

Meeting Date: 8 February 2019

From: Graham Hughes, Executive Director (Place and Economy)

Electoral division(s): Waterbeach

Forward Plan ref: 2019/007 **Key decision:** Yes

Purpose: The purpose of this report is to:

1) update the Committee on the progress of the planning application for 4,500 dwellings at Waterbeach New Town East,

2) to appraise the Committee of the Council's response to the application and, particularly in relation to the holding objections, and 3) to approve the draft heads of terms that would be used in the planning agreement.

Recommendation: The Committee is requested to:

a) Consider and approve the Council's comments on the planning application and draft section 106 heads of terms;

b) Delegate to the Executive Director (Place and Economy) in consultation with the Chairman and Vice Chairman of the Committee the authority to make minor changes to the Council's response in Appendix 2; and

c) Delegate to the Executive Director (Place and Economy) in consultation with the Chairman and Vice Chairman of the Committee the authority to conclude negotiations on the section 106 agreement.

<i>Officer contact:</i>		<i>Member contacts:</i>	
Name:	Juliet Richardson	Names:	Councillors Bates and Wotherspoon
Post:	Business Manager Growth & Development	Post:	Chair/Vice-Chair
Email:	Juliet.richardson@cambridgeshire.gov.uk	Email:	lan.bates@cambridgeshire.gov.uk timothy.wotherspoon@cambridgeshire.gov.uk
Tel:	01223 699868	Tel:	01223 706398

1. BACKGROUND

Policy Framework

- 1.1 The South Cambridgeshire Local Plan allocates three new strategic scale residential led development sites at Waterbeach (8,000 to 9,000 dwellings), Bourn Airfield (3,500) and Cambourne West (1,200). More specifically for Waterbeach new town, Policy SS/5 sets out the policy requirements to be included in the planning application, including:
- Provision of community facilities, including primary and secondary education;
 - Access from the existing village for pedestrians and cyclists whilst avoiding a direct vehicular route;
 - High quality transport links to Cambridge including a new railway station, park and ride and segregated busway and cycleways; and
 - Increased capacity on the A10 corridor.
- 1.2 The allocation site is controlled by two parties. RLW (a consortium comprising Turnstone Estates and Royal London Insurance), whose application is being considered in this report, control the eastern part of the site comprising approximately 40%, and located on agricultural land beyond the airfield. Urban and Civic (for the Ministry of Defence) control the former Barracks and approximately 60% of the site.
- 1.3 In addition to the general principles set out in the Local Plan, South Cambridgeshire District Council (SCDC) is also preparing a Supplementary Planning Document (SPD) to add further detail to the local plan policies. This will be an important document as it provides greater clarity on key strategic issues such as transport, education, phasing and delivery. This will address issues that cut across the interface between the two sites such as movement networks, strategic open space, access to the railway and secondary education. The SPD will go to SCDC Cabinet on 6 February 2019 with a recommendation to adopt.

The Planning Application

- 1.4 The planning application for the development of the land known as Waterbeach New Town East was submitted to South Cambridgeshire District Council in June 2018. This is an outline application made by RLW for the comprehensive development of the land immediately to the east of the former barracks and airfield site. The development is described in the application as:
- “Outline planning permission (with all matters reserved) for development of up to 4,500 dwellings, business, retail, community, leisure and sports uses; new primary and secondary schools and sixth form centre; public open spaces including parks and ecological areas; points of access, associated drainage and other infrastructure, groundworks, landscaping, and highways works”*
- 1.5 Appendix 1 details an indicative masterplan of the application site in the context of the wider Waterbeach New Town allocation. There is a link at the end of this report to the SCDC planning website where full details of the application can be obtained.
- 1.6 Prior to and since the submission of the planning application the County Council, the applicant and SCDC have had ongoing discussions to resolve outstanding issues relating

to the application and in respect to the planning obligations (section 106 agreement) that are necessary to make the development acceptable.

- 1.7 For the avoidance of doubt this report only considers the application on the Waterbeach New Town East. A further planning application for the land on the former barracks and airfield site to the west was considered by this Committee in July 2018 and at the time of writing is due to be presented to the South Cambridgeshire planning committee.

2. MAIN ISSUES

Comments on Planning Application

- 2.1 Officers have reviewed the RLW submission and supporting documents and a summary of the key issues are set out below. Full detailed comments are also included in Appendix 2. This section sets out the key issues arising from the development.

Transport

- 2.2 The evidence suggests that no element of the site could come forward without the relocated railway station and associated connection to the A10 put in place first.
- 2.3 The site could then be brought forward on a 'monitor and manage' basis, with an initial 800 units – served by the relocated railway station and other complementary mitigation. Trips from the development would be monitored with a view to capping the development to accord with a phase one 'trip budget'.

Initial Phase

- 2.4 The proposals include an initial phase of up to approximately 800 units alongside the relocated railway station and connection to it. The mitigation allowing this phase is dependent upon the railway station and is complementary to the proposed Urban and Civic mitigation package for junction improvements on the A10 corridor, a cycle way along the Mere Way between Waterbeach and Cambridge, and an enhanced bus service to central Cambridge.
- 2.5 The applicant has sought to include residential dwellings, accessed off Cody Road, prior to the delivery of the new station and associated connection to the A10 (up to 200). Cambridgeshire County Council (CCC) Highways team have indicated that no more than 50 dwellings could be accessed from Cody Road without the railway station and associated access to the A10 in place. Subject to sufficient commitment and evidence, further dwellings could potentially be negotiated (up to 200) immediately prior to station delivery (i.e. within a year of opening).

Assumptions

- 2.6 The mitigation package proposed by RLW draws on evidence that the A10 will be at capacity following the development of Urban and Civic's first phase, and the associated junction mitigation package proposed with this first phase. Therefore, the amount of homes that can be developed by RLW is dependent upon new capacity being unlocked (either through new sustainable measures or by abstracting trips from the A10).

- 2.7 For each aspect of the mitigation package robust assumptions have been applied to ensure that the calculations are conservative. These relate to the vehicle trip rate from the development, the highway capacity of the A10 with the junction mitigation schemes, the ratio of trips taken off the A10 and transferring to other modes of travel, the ability of the park and ride to attract southbound A10 traffic, and the expected initial uplift in rail passenger numbers using the relocated railway station.
- 2.8 Varying the assumptions in the calculations produces a range of values of the cumulative total number of dwellings that would be possible with the first phase of Urban and Civic and RLW. This could vary, and so the first phase total of approximately 800 dwellings is considered to be an amount for RLW and would give a combined total of 2400 dwellings for both first phases. As with the Urban and Civic development, trips from the development would be monitored with a view to capping the development to accord with a phase one 'trip budget'. Beyond this phase, no further development would be allowed on the site without (a) further transport assessment, and (b) agreement of additional (strategic) mitigation.
- 2.9 No future phases could take place without implementation of further mitigation measures. The details of the future mitigation will be drawn from the emerging findings of the Cambridgeshire and Peterborough Combined Authority's Ely to Cambridge Strategic Study and agreed as part of a phase by phase Transport Assessment (TA) process.

Future Phases

- 2.10 Beyond the respective first phases and associated mitigation, the details of the future mitigation will be drawn from the emerging findings of the Combined Authority's Ely to Cambridge Strategic Study and associated work streams by the Combined Authority and Greater Cambridge Partnership on these strategic transport interventions for the A10 corridor. This will need to be assessed and agreed as part of a phase by phase Transport Assessment process for the next phase of the town.
- 2.11 As part of this outline application by RLW, as with the Urban and Civic application, the Council would secure the principle of a significant financial cap – i.e. a financial contribution towards strategic solutions to unlock future phases. This financial contribution will have flexibility in terms of how it is spent, with the fundamental purpose of supporting whichever strategic solutions are deemed most appropriate for the site/A10 area.

The Railway Station

- 2.12 It is clear from the evidence that the relocation of the railway station is a significant piece of infrastructure that has huge potential to unlock the growth of Waterbeach New Town. This is recognised in the Waterbeach SPD that seeks the construction of the railway station at the earliest opportunity. RLW have obtained planning permission for the new station, and the expectation is that the station will be delivered first, with the first homes by RLW located adjacent to the station area.
- 2.13 The assumption made in the calculations for the first phase of 800 dwellings as detailed in paragraph 2.8 above is that the relocation of the railway station will attract an uplift in passenger numbers from the existing village due to the enhanced facilities, (notwithstanding the potential uplift from the lengthening of trains from 4 car to 8 car formations). Following the opening of the station, its location is best placed for the

catchment of the new town and the existing village, with most of the new town within the optimum distance of 2km used in rail industry modelling of station use.

- 2.14 As the new town grows in size, a greater proportion of journeys will be classed as internal and will not leave the town or the existing village. Evidence from 2011 census journey to work data suggests that this could be expected to increase from an initial 10% to 20% of trips as the new town and existing village reach a combined mass of circa 4,400 dwellings. This is the benefit of developing new towns, as residents are able to go to schools, shopping and even work in either the new town or within the village or Cambridge Research Park nearby, and need to make fewer trips onto the surrounding transport network. This lowers the trip generation of vehicles onto the A10 per dwelling, which means that the relative impact of new dwellings on the A10 reduces in time.
- 2.15 Over the longer term, other factors that will limit the impact of the future town on the A10 relate to the growth of employment at the Cambridge Science Park and Northern fringe area in the vicinity of Cambridge North Station, and the development of the CAM Metro which will link the new town into the surrounding Cambridge hinterland.
- 2.16 In summary, there are clear limitations on the existing railway station at Waterbeach, and an opportunity exists for the two developers of the new town to work together to facilitate the prompt delivery of the new relocated railway station at the earliest opportunity. This facilitates the first phase of RLW development of 800 dwellings, and will beyond this help maximise the rail mode share, therefore helping reduce the impact of development on the A10, allowing more development to come forward. This will be captured in the monitoring of traffic flows on the A10 and the travel behaviour of residents in the new town.

The application by RLW

- 2.17 Notwithstanding the above, there are technical matters that need to be resolved before CCC is in a position to approve the evidence and to agree the initial mitigation package. These issues are:
- Railway Station Delivery Model – Clarification of the railway station delivery along with a park and ride facility that will cater for the full demand of the existing station as well as an increased draw from the A10.
 - Full development of 11,000 dwellings – The application proposals exceed the assumed 2031 growth accounted for in the Ely to Cambridge Study (by 1,000 dwellings, and 3,639 jobs at Waterbeach). The applicant needs to clarify whether the strategic transport solution is able to cater for the additional growth beyond that envisaged by the Ely to Cambridge Transport Study.
 - Access from the A10 – Information relating to the access and route through Urban and Civic is required.
 - Rail Based Park and Ride - The applicant is required to commit to an enhanced park and ride facility for 250 vehicles in the first phase, and to detail the access strategy for this parking. Would some of this parking be accessible from Waterbeach village via Cody Road, or would it only be accessible by car via the New Town?
 - Public Transport Access Strategy - The applicant is required to investigate the potential for a combined first phase public transport strategy to compliment that of Urban and Civics.

- Mayor's Cambridge Autonomous Metro - The applicant is asked to detail that the masterplan of the eastern side of the town is capable of enabling a CAM route linking to the railway station in the future.

2.18 As seen above some further discussion and technical work is required on the overall strategy. However, in principle a phase 1 for RLW with an associated mitigation package that complements that of Urban and Civics is possible. An indicative and non-exhaustive early phase mitigation package is detailed below.

Ref	Phase 1 Mitigation Package particular to RLW	Details
1	To undertake traffic flow monitoring of the study area and site access junction and travel surveys of the site. Details of the location and type of monitoring to be agreed with the Local Highway Authority (LHA).	S106
2	To implement prior to occupation improvements to capacity and road safety at the junctions of Waterbeach Road / Car Dyke Road / A10. The details of the works to be agreed with the LHA.	condition
3	To implement prior to occupation relocated Waterbeach Railway Station with link road to Urban and Civic land.	condition
4	To implement prior to occupation park and ride facility for 250 vehicles at the relocated railway station.	Condition
5	To contribute towards the Waterbeach to Cambridge greenway project. The greenway increases the rate of cycling within the village and thereby reduces existing trips on the A10 and creating capacity.	S106
6	To implement prior to occupation improvements to cycle safety and traffic calming within Milton between Ely Road and the A14. The details of the works to be agreed with the LHA.	Condition / S106
7	To implement within one year of the first occupation improvements to cycle safety and traffic calming within Waterbeach village between Denny End Road, the railway station and along Car Dyke Road. The details of the works to be agreed with the LHA.	Condition / S106
8	To implement prior to completion of the Cambridge to Waterbeach Greenway a link to the Greenway within the site should this be required. The details of the works to be agreed with the LHA.	condition
9	To implement prior to occupation improvements to the cycle route between the relocated railway station and Cambridge Research Park. The details of the works to be agreed with the LHA.	condition
10	Details of the bus service strategy to be provided. This is to facilitate the provision of bus services that compliment and link to the Urban and Civic bus service.	Condition
11	To facilitate the provision of a community bus service. This is to enable links between Cambridge Research Park, the site and Waterbeach Railway Station, and for other community uses.	Condition
12	To monitor car parking within the vicinity of the railway station and to fund the provision of additional parking controls where required.	Condition
13	To monitor bus journey times for the bus route through Landbeach and investigate and bring forward options for bus priority on the A10 to reduce bus journey times.	Condition
14	To facilitate the construction of a link road between the Urban and Civic land and the relocated railway station prior to its opening.	S106

Ref	Phase 1 Mitigation Package particular to RLW	Details
15	That a Travel Plan is submitted and approved by the LPA prior to occupation of the first dwelling. The travel plan should include personalised travel planning, subsidised bus travel and cycle purchase.	Condition

- 2.19 The Highway Authority requests a hold on any further development beyond an initial phase of approximately 800 dwellings. Any future phase will require a joint Transport Assessment to be approved by the Local Planning Authority. The additional Transport Assessment will need to refer to strategic A10 solutions and other public transport and cycling based infrastructure that is identified within the Waterbeach Special Planning Document and Ely to Cambridge Study work.
- 2.20 Further development of the new town will be dependent on this infrastructure being implemented. This infrastructure is to be delivered by either the CPCA for the A10 improvements or the Greater Cambridge Partnership for the high quality public transport link and greenway between Waterbeach and Cambridge.
- 2.21 The developer will ultimately be required to contribute, (with an overall cap to be agreed), towards the strategic solutions identified by the CPCA and Greater Cambridge Partnership to unlock future phases. This includes contributions towards the following strategic infrastructure.

Ref	Mitigation	Details
16	A contribution towards the upgrade of the A10 between the A14 and Waterbeach. The amount to be determined and subject to agreement with the County Council.	S106
17	A contribution towards the upgrade of the A14 / 10 interchange The amount to be determined and subject to agreement with the County Council.	S106
18	A contribution towards a public transport corridor between Waterbeach and Cambridge. The amount to be determined and subject to agreement with the County Council.	S106
19	A contribution towards the provision of improved cycle connections to Histon, Impington, Streatham, Fen Ditton and Lode (via a new bridge over the River Cam). The amount and works to be determined and subject to agreement with the County Council.	S106
20	A contribution towards a Waterbeach transport hub / Park and Ride facility.	S106
21	Ongoing monitoring of travel behaviour and vehicle flows in the study area and any additional mitigation measures required resulting from increased traffic flows.	S106

Education

- 2.22 The application has made provision for 2 primary school sites each of 3 hectares in size to accommodate up to 3 forms of entry (FE) (630 children), including early years provision on

each. The application also makes reference to potential to expand both schools by an additional 1FE which would result in a total of 8FE which is adequate to meet the primary demand from the development. Therefore the County Council will require assurance that appropriate allowance is made in the masterplan to accommodate the primary school sites up to 8 hectares (2 x 4ha) and for capital contributions towards their construction.

- 2.23 The application is making provision for an 8FE secondary school with potential for further expansion to 10FE. As with the primary schools, the applicant needs to demonstrate that the secondary school site is sufficient to accommodate the expanded school.
- 2.24 A site for a Post 16 facility has been included in the event that future reviews of provision in the County demonstrate a need in Waterbeach. Contributions will be sought from both developers towards this and an alternative facility off-site.
- 2.25 The adjacent development will provide a site for special educational needs provision, which like Post 16, will be subject to a further County review. Both developers will make proportionate financial contributions towards this or alternative off-site provision.
- 2.26 The education service has reviewed the application in respect to the suitability of the education sites identified. In terms of location, there is a concern that the secondary school is located at the margins of the development whereas the preference is for a site located more centrally within the community. The playing fields have a drainage ditch across them and this is not acceptable from an education perspective and therefore object to the current masterplan showing the ditch in its current form.
- 2.27 The location of the southern primary school and the Post 16 facility is acceptable in education terms.
- 2.28 The Environmental Statement indicates that outdoor noise levels at the southern primary school are predicted to be up to 62 Decibels (Db). In accordance with the Building Bulletin requirements, an education site should not exceed internal noise levels 35 Db or externally of more than 50Db, which is the maximum standard. CCC Education, require flexibility in terms of the layout of the building and positioning non-teaching spaces as a noise barrier is a significant constraint in education terms, which is not supported.
- 2.29 To enable CCC Education to further assess the noise impact to the schools the following additional information is required to confirm the noise source to the southern school buildings; i) confirmation of likely internal noise levels within the school buildings and ii) clarification of mitigation measures that will not impact upon the design of the schools or the cost of delivery of the schools. A holding objection to the application is raised until the above matters have been addressed.

Minerals and Waste

- 2.30 Policy CS28 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy seeks to encourage waste minimisation, re-use and resource recovery. It also requires waste audit and management strategies to be prepared in schemes over a certain size. Appendix 4.1, 4.2 and 4.3 of the Environmental Statement addresses this topic and the content of these documents is welcomed. The matter of waste management should be identified as a reserved matter and, in the event that planning permission is granted, and

appropriate condition requiring a waste management and minimisation plan be attached to the permission.

- 2.31 Ensuring the sustainable use of mineral extracted during redevelopment is consistent with the principles of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction. In order to ensure that this is addressed satisfactorily through all the construction phases of the development it is suggested that if consent is given, a clause is included in the planning condition which requires the preparation and implementation of a Construction Environment Management Plan covering the sustainable use of any minerals extracted during the construction of the development, so far as this is practicable. If mineral is to be removed from the site, this will require planning permission from the County Council as Mineral Planning Authority.

Libraries and Lifelong Learning

- 2.32 Based on 4,500 dwellings and an estimated population of 11,250 new residents would require provision of a new library facility to serve the development. The adjoining development will contain the town centre and as part of this will provide a range of community facilities including the provision of a community library. This is in line with Cambridgeshire County Council's policy for the 21st century library service which recognises the importance of developing community hubs where library services are provided in shared buildings in partnership with other service providers. Contributions will be sought from both developers towards the cost of providing this facility.

Floods Risk

- 2.33 The Environmental Impact Assessment has revealed that a large part of the site, including the location of a primary school, is located in an area that is at residual risk of flooding from a potential breach of the river Cam defences. Consequently the applicant has proposed a number of mitigations, including the formation of a bund for the northern section of the site around residential areas and the primary school and ground raising in the southern part of the site.
- 2.34 The Environment Agency and the Council's flood risk team have raised a number of concerns relating to the applicant's approach to assessing and mitigating flood risk. Firstly, before any mitigation solutions are pursued a sequential approach to the allocation of vulnerable uses should be undertaken within the boundary of the site. Secondly, before new mitigation options are pursued and relied upon for this site, the existing defences should be considered and whether or not they can be improved, replaced or even removed as part of this project, therefore reducing or removing the existing residual risk rather than creating a new residual risk. Thirdly, if other avenues are explored and exhausted leaving only new mitigation options the applicant will still need to provide additional information about adoption and long-term maintenance for new defences.
- 2.35 With regards to the issues considered above the County Council raises a holding objection until the residual flood risk has been assessed in line with the National Planning Policy Framework (NPPF) and mitigated to the satisfaction of the local planning and flood risk authorities.

- 2.36 Whilst not a matter for planning the applicant and local planning authority should be informed that the site is in an area where insurance premiums may be a problem by virtue of the insurance industry's assessment of flood risk.

Public Health

- 2.37 The application, specifically the Health Impact Assessment, has been reviewed against the New Housing Developments and the Built Environment Joint Strategic Needs Assessment (JSNA) for Cambridgeshire. This review ensures that the application and assessments have identified the relevant impacts on health and contains specific mitigation measures to address these impacts. The detailed review and recommendations are contained in Appendix 2 (section 6).

Connecting Cambridgeshire

- 2.38 The inclusion of a condition has been requested to be included in the planning permission to secure the need for Fibre/Fibre ducting to be developed during the construction of the development.

Draft Section 106 Heads of Terms

- 2.39 Planning obligations or Section 106 agreements are legal agreements between local planning authorities and developers in the context of the granting of planning permission. They can be both financial and non-financial (land, works in kind), and they are used when there is a requirement to address the impact of a development and the impact itself cannot be dealt with through a planning condition on the permission. The use of planning obligations is an effective tool to ensure that development meets the objectives of sustainable development as required in local and national policies.
- 2.40 Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) provides that from 6th April 2010 it is unlawful for a planning obligation to be taken into account when determining a planning application if the obligation does not meet the following tests:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 2.41 Officers are working with the applicant and SCDC to progress the Heads of Terms for a S106 Agreement to secure the necessary infrastructure to make this development acceptable in planning terms.
- 2.42 The table below provides a schedule of the planning obligations that are currently being proposed and which are considered necessary to mitigate the impact of the development. This relates only to County Council infrastructure and services.
- 2.43 The final heads of terms will be approved by the local planning authority prior to resolving to grant of planning permission. It is recognised that there is further work to do on the heads of terms prior to this and this table captures the key issues. Members should be mindful that these will be scrutinised against the legal tests in paragraph 2.38 above and possible

viability assessment of the development. The Committee is asked, therefore, to endorse the current heads of terms as set out below and provide delegated authority as set out in the recommendation to conclude the negotiation.

Infrastructure Type		Land Requirement	Development Contribution Amount Required (with Indexation Date).
Primary schools	2 x 3FE with EY + 1FE expansion	2 x 4 hectares	£16,200,000 (3Q18) per school
Secondary school	6FE + 2FE expansion	10.5 hectares	£30,000,000 (3Q17)
Post 16	400 place facility	1.8 hectares	£5,320,000 (4Q17)
Special Education Need	110 place	Off-site	£4,837,282 (4Q17)
Children's Centre	Office + room	Provided at a community building or school	In kind
Nursery	D1 Use Class Order designation	To be confirmed	In kind
On-site school start-up costs	Comprising £50,000 per primary school and £150,000 per secondary school	Not applicable	£250,000
Library	Hub library to be provided in community building	On adjacent development site	To be confirmed
Public Health and Community Development	To be confirmed	To be confirmed	To be confirmed
Transport	To be confirmed	To be confirmed	To be confirmed

3. ALIGNMENT WITH CORPORATE PRIORITIES

3.1 Developing the local economy for the benefit of all

The development will provide employment and retail opportunities to benefit the local economy.

3.2 Helping people live healthy and independent lives

The application provides a range of measures to promote healthy lives, including sport, play and leisure uses. The application includes a proposal for a 600 residential care bed spaces or similar.

3.3 **Supporting and protecting vulnerable people**

Contributions towards community health and development workers are being sought to help support vulnerable people whilst the new community is being established.

4. **SIGNIFICANT IMPLICATIONS**

4.1 **Resource Implications**

There are no further significant resource implications at this stage.

4.2 **Procurement/Contractual/Council Contract Procedure Rules Implications**

There are no significant implications within this category.

4.3 **Statutory, Legal and Risk Implications**

There are no significant implications within this category other than the need to settle the terms of an agreement under S106 of the Town and Country Planning Act 1990 with the developers and the SCDC.

4.4 **Equality and Diversity Implications**

There are no significant implications within this category at this stage. The needs of older people, people with disability and people with special education needs have been considered by County Council service areas in commenting on the application proposal and the mitigation package.

4.5 **Engagement and Communications Implications**

There are no significant implications within this category.

4.6 **Localism and Local Member Involvement**

There are no significant implications within this category.

4.7 **Public Health Implications**

There are no significant implications within this category.

Implications	Officer Clearance
Have the resource implications been cleared by Finance?	Yes Name of Financial Officer: Sarah Heywood
Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by Finance?	N/A
Has the impact on statutory, legal and risk implications been cleared by LGSS Law?	Yes Name of Legal Officer: Debbie Carter-Hughes
Have the equality and diversity implications been cleared by your Service Contact?	Yes Name of Officer: Elsa Evans

Have any engagement and communication implications been cleared by Communications?	Yes Name of Officer: Joanne Shilton
Have any localism and Local Member involvement issues been cleared by your Service Contact?	Yes Name of Officer: Andrew Preston
Have any Public Health implications been cleared by Public Health	Yes Name of Officer: Stuart Keble

Source Documents	Location
South Cambridgeshire District Council planning application reference S/2075/18/OL	South Cambridgeshire District Council planning portal: S/2075/18/OL

Appendix 1: Indicative Masterplan



Appendix 2: Cambridgeshire County Council Comments

Land adjacent to Waterbeach Barracks & Airfield site, Waterbeach

Outline Planning Application by RLW Estates Ltd (S/2075/18/OL)

County Council Comments

Outline planning permission (with all matters reserved) for development of up to 4,500 dwellings, business, retail, community, leisure and sports uses; new primary and secondary schools and sixth form centre; public open spaces including parks and ecological areas; points of access, associated drainage and other infrastructure, groundworks, landscaping, and highways works.

1. Summary of Response

- 1.1 This note sets out the County Council officer comments on the above outline planning application in response to a consultation by South Cambridgeshire District Council. Whilst County Members have been made aware of the consultation, this response does not include their comments or considerations. The County Council Environment and Economy Committee will consider the response and S106 agreement draft Heads of Terms, before any agreement is signed. The committee is scheduled to consider this planning application at its meeting in February 2019.
- 1.2 Officers broadly SUPPORT the principle of residential-led development on this site, as part of the Waterbeach New Town as a key component of the broader growth agenda for Cambridgeshire. However support for this planning application is subject to appropriate and necessary planning conditions and agreements to ensure that the impacts are adequately mitigated.
- 1.3 Set out below are the detailed officer comments from County Council service teams, identifying those issues to be addressed by the applicant and mitigation measures necessary to make the development acceptable in planning terms. Such measures will be demonstrated to be compliant with the relevant planning tests:
 - Necessary to make the development acceptable in planning terms
 - Directly related to the development
 - Fairly and reasonable related in scale and kind to the development

2. Education

- 2.1 The application has been reviewed from an education perspective, in relation to the proposed location of the two primary schools, secondary school and Sixth Form College. With this being an outline application, the detail of school location and design will be a reserved matter consideration. However, the application is accompanied by parameter plans, which will be formally determined as part of this planning application.

Primary Provision

- 2.2 The Education services has had pre-application discussions with the applicant and on the basis of the 4,500 dwellings proposed in the application agreed an appropriate form of mitigation for primary education.
- 2.3 The development will generate 8.6 forms of entry (FE) of primary demand. The County Council has sought on-site provision for 8FE whilst slightly below the high level projections using the Council's general multipliers, it is recognised that the developer aspirations for housing mix may mean that a move towards a lower level of projected demand is appropriate. The application has provided sites in the masterplan for 2 primary schools both of which will be built as 3FE schools initially with the potential to expand to 4FE later in the development should the demand materialise. Whilst there is reference in the application to 6 hectares of land for primary schools (2 x 3FE), there is no commitment to provide the additional 2 hectares necessary to expand each of the schools by an additional 1FE. The County Council will wish to ensure that appropriate allowance is made in the masterplan to accommodate primary school sites up to 8 hectares (2 x 4ha).
- 2.4 In addition to land the County Council will require a capital contribution towards the cost of constructing the schools. As both schools are likely to be built in 2 phases each will require a contribution of £14,130,000 (3Q2018) for the initial phase of 3FE with 3 early years rooms and a 4FE core. The second phase of 1FE will require a contribution of £2,070,000 (3Q2018).

Secondary Provision

- 2.5 The development will generate 7.5FE of secondary demand. The County Council has sought on-site provision for 8FE whilst slightly below the high level projections using the Council's general multipliers and the application has provided a site of 8 hectares in the masterplan for the secondary school. The application also makes reference to the potential to expand the secondary school by a

further 2FE should demand across the new town and from Waterbeach village require additional capacity. Whilst there is reference in the application to 8 hectares of land for the initial phase, there is no commitment to provide the additional 2 hectares necessary to expand the school by an additional 2FE. The County Council will wish to ensure that appropriate allowance is made in the masterplan to accommodate the secondary school site up to 10 hectares should demand be such that further expansion is required.

- 2.6 In addition to land the County Council will require a capital contribution towards the cost of constructing the school of £30,000,000 (4Q2017) for the initial phase of 8FE.

Post 16 Provision

- 2.7 With the scale of development proposed within the wider area it is likely that there would be a need to secure additional Post 16 provision. It is likely that there would be some capacity in the short-term and that additional provision in Waterbeach would only be required towards the later period of development.
- 2.8 Based on the requirements secured at Northstowe, it would be anticipated that a 400 place post-16 provision would be required. It is unknown at this stage what form this provision might take and this would need to be determined following a review of supply and demand closer to implementation. Based on the Northstowe requirements, a site of 1.8Ha would be required to provide a facility of suitable scale. A facility of this scale would cost £13,300,000 (4Q2017) and it is proposed that contributions are sought from both developers on the new town on a proportionate basis. For this application a contribution of £5,320,000 together with a site of 1.8 hectares will be required.

Special Educational Needs (SEN)

- 2.9 In July 2013, the Council identified a needs for three new Area Special Schools, to be built at Alconbury, Littleport and Northstowe. These were identified to mitigate increasing demand resulting from increasing complexities of need as well as additional housing developments. The assessment of need for additional provision did not take account of development which would come forward as part of future local plans across Cambridgeshire.
- 2.10 As such, whilst, in the short-term there is likely to be some surplus capacity within existing special school provision, in the longer-term there is likely to be a shortfall in provision as the Waterbeach developments are built out. It is anticipated there will be demand for 83 SEN places across the whole

new town based on projections using both current applications. The current application will generate a need for 34 SEN places.

- 2.11 The Council typically builds Special School's to provide places for up to 110 children and young people. It is accepted that this is larger than current projections for demand from the proposed developments. As such, it is not anticipated that the developments would be expected to secure 100% of the capital costs through the S106 agreements.
- 2.12 Based on the full cost of £15,650,000 the 34 SEN places from this development will require a contribution of £4,837,282. There is no requirement for the current application to provide land as this will be provided by the adjacent developer.

Location of Schools

Illustrative Masterplan and Parameter Plans- Secondary School and northern of the two primary schools

- 2.13 The secondary school and the northern of the two primary schools are located adjacent to each other within the far north of the development. In terms of the secondary school, the preference of CCC Education is for secondary schools to be located centrally within the development that they are serving, to provide the heart of the community. The proposed Secondary School is located in the far north of the development and whilst not in the ideal location from an educational perspective, it is appreciated that there may be other masterplan considerations, which have influenced the location of the secondary school.
- 2.14 The Illustrative Masterplan shows the secondary school buildings located towards the south of the school site adjacent to the primary road, with the playing fields located to the north. Whilst it is appreciated that the drainage strategy is only indicative at this stage, the Illustrative Masterplan shows the school playing fields separated from the southern part of the education campus by an existing drainage ditch. Separation of school playing fields by a ditch, would not be acceptable from an education perspective. Provision of a ditch would provide a physical barrier within the school campus, which would not meet the Building Bulletin requirements. It would negatively impact upon the ability to provide comprehensive education layout at the site and it would also present a potential health and safety concerns at the site. As part of the Section 106 agreement, CCC Education would require an unencumbered school site.

- 2.15 CCC Education would request that the Illustrative Masterplan and Design & Access Statement are amended prior to the determination of the application, to show an alternative drainage and masterplanning solution for this area. If not, it could potentially be a matter to be secured by way of a suitably worded planning condition. CCC Education would object to any approval of the Illustrative Masterplan and Design & Access Statement that shows the drainage ditch in its current form.
- 2.16 The secondary school and primary school in the northern part of the site, are both located adjacent to the primary road route, which has bus access and the local centre. They are separated by the Bannold Drove priority cycle route. In accessibility terms, locating the schools adjacent to the bus routes and cycle routes is good urban design and is supported.
- 2.17 Without prejudice to the comments made in section 5 below, in terms of the primary school within the northern part of the site, there is no objection to its location, subject to addressing noise concerns as outlined below.

Illustrative Masterplan and Parameter Plans- Southern Primary School and Sixth Form Centre

- 2.18 The southern primary school is located within the heart of the development, which is supported (subject to addressing concerns over noise issues refer to section 5 below). The Access and Movement Parameter Plan sets out the primary school is adjacent to proposed cycle ways on its northern, eastern, southern and western boundaries. Whilst CCC Education are supportive of provision of good cycle connections adjacent to the school, clarification is required in terms of principle vehicle access point to the school. There is a primary road located to the south of the site, however this is separated from the school by both a cycleway and green corridor. Confirmation will be requested to confirm how suitable access to the school will be provided, the detail of which can be worked up at reserved matters stage.
- 2.19 The sixth form centre is also located within the heart of the development, which is supported in planning terms. It is also located in close proximity to the station, which is also supported. It appears to be well connected in terms of cycleway access. In planning terms, it would have been preferable if the secondary school had been located more centrally and in closer proximity to the sixth form, which would provide a good co- location of uses. It would also allow for better connectivity with the secondary school and the train station. It is appreciated that there may have been other masterplanning considerations that dictated that this was not possible.

Density and Storey Heights Parameter Plans

- 2.20 In terms of density, as set out within the Density and Storey Heights Parameter Plan, the secondary school and primary school within the northern part of the site, are located within a medium density area, where development will predominantly be 3 storeys, but flexibility is allowed for 5 storey buildings in appropriate parts of the site. This is considered to be a suitable approach to density. It should, however, be noted that the primary school is likely to a maximum of two storeys. At detailed design stage care should be taken to ensure that the primary school is not overlooked by adjacent dwellings. The secondary school is likely to be a higher building and having the flexibility to build up to five storeys is considered to be appropriate.
- 2.21 In relation to the southern primary school, this is located in the higher density area of the site, which will be an average of three storeys in height, but with 25% up to five storeys. No objection is raised to this in principle terms, however care should be taken at the detailed design/reserved matters stage to ensure that the school is not overlooked by the adjacent residential parcels.
- 2.22 The sixth form centre is also located in a high density area; no objection is raised to this. It is possible that elements of the sixth form could be four/five storeys in height.

Sustainability Statement

- 2.23 The sustainability Statement references that the non-domestic buildings will achieve a BREEAM rating of at least very good. No objection is raised to this, BREEAM very good rating is consistent with the County Council's own standard for education buildings. CCC Education would be happy to secure this requirement by way of either planning condition or within the Section 106 agreement.
- 2.24 The Sustainability Statement also references the need for electric vehicle charging points within non-residential buildings. No objection is raised to the provision for some electric vehicle charging points within the schools, provided that the number provided is proportional. The applicants would also just note that the school car parks (especially for the primary schools) will be for staff parking rather than having community use.

Environmental Statement - Noise

- 2.25 Further clarification is required in relation to noise matters. Section 12.6 of the Environmental Statement states the following:

'At this stage, the exact layout for outside teaching rooms, playground and other outdoor area for the proposed educational land use is unknown. The outdoor noise area for the proposed school area in the southern part of the site is predicted to be up to 62 dB at the eastern and western boundaries and therefore it is proposed that areas used for non- teaching purposes, such as stairwells, could be located on those facades as a barrier to the road traffic noise.'

- 2.26 In addition, Table 12.29 states that the proposed school area in the northern parcel could experience outdoor noise levels as high as 41-58Db.
- 2.27 The Building Bulletin 93 Acoustic for School Design Guide, states that internally new schools should have a maximum internal noise level of 35Db LAeq, which should be achieved with allowance for natural ventilation. Within areas used for external teaching purposes, for example sports lessons; outdoor ambient noise levels will have a significant impact on communication in an environment, which is already acoustically less favourable than most classrooms. It states that noise levels in unoccupied playgrounds, playing fields and other outdoor areas should not exceed 55 dB LAeq,30min and there should be at least one area suitable for outdoor teaching activities where noise levels are below 50 dB LAeq,30min.
- 2.28 In accordance with the Building Bulletin requirements, CCC Education would raise objection to an education site having internal noise levels of higher than 35 Db or externally of more than 50Db, which is the maximum standard. CCC Education, require flexibility in terms of the layout of the building and positioning non- teaching spaces as a noise barrier is a significant constrain in education terms, which is not supported.
- 2.29 To enable CCC Education to further assess the noise impact to the schools, the following additional information is requested:
- Confirmation of the noise source to the southern school buildings, is the report referring to an existing or proposed road? This is not clear from this section of the report;
 - Confirmation of likely internal noise levels within the school buildings;
 - Clarification of mitigation measures that will not impact upon the design of the schools or the cost of delivery of the schools, which could help address the issues raised.
- 2.30 Further information on the above matters needs to be provided prior to the determination of the application. It is slightly surprising that noise levels are as high as 62dB at the southern of the schools, given that this is the one that is most centrally located within the site. CCC Education will have a holding objection to the application until the above matters have been addressed.

Levels

- 2.31 The site benefits from being relatively flat. CCC Education will require all education sites to be level as part of the Section106 agreement. No objection is raised to the school locations on level grounds.

Conclusion

- 2.32 Elements of the application are supported, such as the good relationship between the education buildings and the cycleway/pedestrian network and that the schools have been planned so that they relate well to the existing road network. However, concern is raised in relation to the following points, which need to be addressed prior to the determination of the application:

1. The provision for an existing drainage ditch through the middle of the Secondary School site is not acceptable. The Illustrative Masterplan needs to be re- designed to ensure that the school site is not separated by a ditch and that it is provided unencumbered.
2. In addressing point 1 above, the applicants would ask if the applicants could consider any opportunity for the secondary school to be located slightly more centrally to the development.
3. Further information is required in relation to noise to allow for an adequate assessment of noise at both the internal and external areas of the education sites. Particular concern is raised in relation to the 62Db anticipated at the southern school site, which would not be acceptable to CCC Education.
4. Confirmation of access to the southern of the two primary school

- 2.33 A holding objection is raised on the application until the above points can be addressed.

3. Mineral and Waste

Waste Management (Operational & Construction)

- 3.1 Policy CS28 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy seeks to encourage waste minimisation, re-use and resource recovery. It also requires waste audit and management strategies to be prepared in schemes over a certain size. Appendix 4.1, 4.2 and 4.3 of the Environmental Statement addresses this topic and the content of these documents is welcomed.

- 3.2 The matter of waste management should be identified as a reserved matter and, in the event that planning permission is granted, it is suggested that the following condition be imposed:

Detailed Waste Management and Minimisation Plan

Prior to the commencement of development (if not addressed in a reserved matters approval) or any reserved matters approval, a Detailed Waste Management and Minimisation Plan (DWMMP) shall be submitted to and approved in writing by the local planning authority. The DWMMP shall include, but not be limited to, details of:

- 1. Construction waste infrastructure including a construction material recycling facility to be in place during all phases of construction;*
- 2. Anticipated nature and volumes of waste and measures to ensure the maximisation of the reuse of waste;*
- 3. Measures and protocols to ensure effective segregation of waste at source including waste sorting, storage, recovery and recycling facilities to ensure the maximisation of waste materials both for use within and outside the site;*
- 4. Any other steps to ensure the minimisation of waste during construction;*
- 5. The location and timing of provision of facilities pursuant to criteria i) to iv);*
- 6. Proposed monitoring and timing of submission of monitoring reports;*
- 7. The proposed timing of submission of a Waste Management Closure Report to demonstrate the effective implementation, management and monitoring of construction waste during the construction lifetime of the development;*
- 8. A RECAP Waste Management Guide toolkit shall be completed, with supporting reference material; and*
- 9. Proposals for the management of municipal waste generated during the occupation phase of the development, to include the design and provision of permanent facilities e.g. internal and external segregation and storage of recyclables, non-recyclables and compostable material; access to storage and collection points by users and waste collection vehicles.*

The Detailed Waste Management and Minimisation Plan shall be implemented in full accordance with the agreed details.

Reason: In the interests of maximising waste re-use and recycling opportunities; and to comply with policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and the Recycling in Cambridgeshire and Peterborough (RECAP) Waste Design Guide 2012; and to comply with the National Planning Policy for Waste October 2014; and Guidance for Local Planning Authorities on Implementing Planning Requirements of the European Union Waste Framework Directive (2008/98/EC), Department for Communities and Local Government, December 2012.

Sand and Gravel Safeguarding

- 3.3 Policy CS26 (Mineral Safeguarding Areas) seeks to prevent the sterilisation of valuable mineral resources. As shown on page 162 of Proposals Map C (Minerals Safeguarding Areas) of the adopted Cambridgeshire and Peterborough Minerals and Waste Development Plan part of this site is identified as containing a sand and gravel resource. The Planning and Delivery Statement acknowledges the existence of this reserve in paragraphs 5.147 and 5.148.
- 3.4 Paragraph 5.147: Part of the Application Site is within a defined Mineral Safeguarding Area (MSA) as shown on Proposals Map C: Mineral Safeguarding Areas. As indicated within the Core Strategy (paragraph 9.3-9.5), the purpose of MSAs is to ensure that mineral resources are adequately considered in all land use planning decisions. MSAs do not necessarily preclude other forms of development taking place, or identify areas for future extraction, but indicate the potential presence of mineral reserves so that they are not unknowingly or needlessly sterilised by development.
- 3.5 Paragraph 5.148: There is a proven mineral resource in the general locality of the application site, which is considered to be a significant resource. Whilst this will not prevent development from coming forward, in line with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) the County Council as Mineral Planning Authority will seek to ensure that any mineral extracted during development is put to a sustainable use.
- 3.6 Ensuring the sustainable use of mineral extracted during redevelopment is consistent with the principles of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction. In order to ensure that this is addressed satisfactorily, through all the construction phases of the development, it is suggested that if consent is given a clause is included the planning condition which requires the preparation and implementation of a Construction Environment Management Plan covering the sustainable use of any minerals extracted during the construction of the development, so far as this is practicable. If

mineral is to be removed from the site, this will require planning permission from the County Council as Mineral Planning Authority.

Energy Centre

- 3.7 The outline planning application includes the provision of an energy centre intended for local energy generation. The Energy Strategy report suggests this will be provided by a single Combined Heat and Power Plant (CHP) for the entire site, and will be supported by solar panels within the wider development. A range of energy sources to power the CHP are under consideration and it is understood that the applicant is focused on 'clean' methods of energy generation, but has not been specific as to which technology will be eventually chosen. A range of technologies are, however, being considered. One of the technologies being considered, although not preferred at this point, is biomass.
- 3.8 If the applicant is minded to pursue biomass in the future it is recommended that advice is sought from the Waste Planning Authority as to whether the biomass is considered a waste or not. The WPA would be able to provide further guidance at that point as to the considerations involved as proposals involving energy from waste are normally a County Matter.
- 3.9 In this context, and for information, an application has been received and is currently being considered by the County Council as Waste Planning Authority for an Energy from Waste facility at Amey Waterbeach Waste Management Park, Waterbeach. The proposed development is located on a site allocated through the adopted Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (2012), Policy SSP W1K, which identifies energy from waste as a potential use for the site. This is referred to in the last paragraph on page 1 of the Energy Strategy Report as a potential source of heat which may be connected to and in correspondence included in Appendix B.

4. Libraries

- 4.1 Requirements based on 4,500 dwellings and an estimated population of 11,250 new residents would significantly increase the population of Waterbeach. We would like to review current provision for Waterbeach which has a Library Access Point. This would include proposing a new library based on £97 per head of increased population, within a shared community facility may need to be provided. The library area should have 1000sqm operational space plus 50sqm workroom space adjacent to the library and access to shared community meeting rooms and public toilets.

- 4.2 This contribution is based on the document “Public Libraries, Archives and New Development: A Standard Charge Approach, May 2010”, developed by the Museums, Libraries and Archives Council on behalf of the Department of Culture, Media and Sport, the central government department with overall statutory responsibility for public libraries.
- 4.3 This comment is provided on an informal and without prejudice basis, based on current information. If new information is released, the library service’s comments and requirements may change and this will be confirmed in response to the planning application consultation.

5. Floods Risk

Residual Flood Risk

- 5.1 The Environmental Impact Assessment has revealed that a large part of the site, including one of the primary schools, is located in an area that is at residual risk of flooding as a consequence of a potential breach of the informal river Cam defences. Whilst it is not possible to forecast the frequency or probability of a breach event, modelling has revealed that at the location of the primary school site a depth of 0.5m could be reached in the event of a breach of the defence. Consequently the applicant has proposed a number of mitigations, including the formation of a bund for the northern section of the site around residential areas (and the affected school) and ground raising in the southern part of the site.
- 5.2 The Environment Agency and the Council’s flood risk team have raised a number of concerns relating to the applicant’s approach to assessing and mitigating flood risk. Firstly, before any mitigation solutions are pursued a sequential approach to the allocation of vulnerable uses should be undertaken within the boundary of the site. The sequential test should include all sources of flooding and in this case the residual flood risk from a breach does not appear to have been properly considered in this context. The site is in current day flood zone 1 but the NPPF now requires that climate change is considered. The informal design of the existing defences suggests that the current day flood zone 1 area of the site may well change once climate change is considered. This approach should be used to determine the location of the more vulnerable uses, including the primary school, and whether they should be moved to an area that is not at residual risk before introducing mitigation for the current location.
- 5.3 Secondly, given the financial pressures on all large development sites and the desire to optimise both affordable housing and infrastructure there are concerns about increased costs to any development

of associated additional infrastructure (in this case for flood mitigation). Therefore, before new mitigation options are pursued and relied upon for this site, the existing defences should be considered and whether or not they can be improved, replaced or even removed as part of this project, therefore reducing or removing the existing residual risk rather than creating a new residual risk. Unless these options are considered it will not be known whether less expensive options exist which could also provide benefits to other local landowners.

- 5.4 Thirdly, if other avenues are explored and exhausted leaving only new mitigation options the applicant will still need to provide additional information about adoption and long-term maintenance for new defences.
- 5.5 With regards to the issues raised above the County Council raises a holding objection until the residual flood risk has been assessed in line with NPPF and mitigated to the satisfaction of the local planning and flood risk authorities.

Drainage Strategy

- 5.6 In its role as Local Lead Flood Authority, the Council has made separate representations on the application relating to the surface water drainage strategy raising the need for further information to be provided to enable a full evaluation of the drainage strategy for the development. The Council has requested the following information to be provided:
- Proposed impermeable area which included an allowance for urban creep;
 - Required volume of attenuation
 - Appropriate consideration of climate change;
 - Details of proposed phasing and how each phase will be delivered in relation to the strategic surface water strategy.
- 5.7 The Council has made a holding objection until the above information is provided in the flood risk assessment.

6. Public Health

- 6.1 The application, specifically the Health Impact Assessment, has been compared to the New Housing Developments and the Built Environment Joint Strategic Needs Assessment (JSNA) for

Cambridgeshire. The JSNA contains an evidence review of the built environment's impact on health and has distilled the evidence into the following themes:

- Generic evidence supporting the built environment's impact on health.
- Green space.
- Developing sustainable communities.
- Community design (to prevent injuries, crime, and to accommodate people with disabilities).
- Connectivity and land use mix.
- Communities that support healthy ageing.
- House design and space.
- Access to unhealthy/"Fast Food".
- Health inequality and the built environment.

6.2 The application has therefore been reviewed against these themes to ensure the application and assessments has identified relevant impacts on health and contains specific mitigation measures to address the impact the development can have on human health.

Specific Comments on the Health Impact Assessment

6.3 Overall the Health Impact Assessment is a thorough examination of the potential health impacts from the published literature but lacks an assessment of the development specifically relating to the masterplan and parameter plans, however, at this outline stage of the process the proposed recommendations are appropriate for the development but lack a commitment to deliver them on site.

6.4 Some of the data used in the HIA, particularly housing cost data, is out of date, but this does not materially affect the assessment within that section.

6.5 The HIA has:

- Appraised the potential positive and negative health and well-being impacts from the literature on planned new communities;
- Highlighted potential differential distribution effects of health impacts among groups within the population by asking 'who is affected?' for the impacts identified;

- Suggested recommendations that aim to minimise any potential negative health impacts and maximise potential positive health impacts, referencing where possible the most affected vulnerable group(s), although the level of commitment to deliver these recommendations is not clear.

6.6 For ease of reference the comments on the HIA have been grouped under the themes put forward in the HIA by the applicant i.e.:

- Exercise and Physical Activity
- Housing
- Air Quality and Odour
- Noise
- Potential for Flood Risk
- Crime and Antisocial Behaviour
- Economy and employment
- Access to Services
- Traffic and Transport
- Social Cohesion
- Landscape/townscape and Tranquillity

Exercise and Physical Activity

6.7 At an academic/theoretical level the HIA has identified the health impacts associated with open space, exercise and physical activity, however the commitment to the standards of provision is vague, for example a commitment could be made to ensure appropriate and equitable provision of open green space through using either the ANGSt standard, or the Sport England Active Design Principles which outline the following themes and standards:

- Activity for all
- Walkable communities
- Connected walking & cycling routes
- Co-location of community facilities
- Network of multifunctional open space

- High quality streets & spaces
- Appropriate infrastructure
- Active buildings
- Management, maintenance, monitoring & evaluation
- Activity promotion & local champions

6.8 The HIA has assessed the needs of vulnerable groups and the approaches which may be needed to ensure all people can benefit from increasing physical activity as part of daily life. The HIA contains a good assessment of the links between physical activity and active travel.

Housing

6.9 At an academic/theoretical level the HIA has identified the health impacts associated with housing tenure location and design, however the commitment to the standards to be adopted have not been mentioned and therefore adequately assessed. The principles of housing standards and design are vague and therefore it is difficult to assess the health impacts, this is a reflection of the outline nature of the application. The provision of a range of house types is welcomed but at this stage the full health impacts cannot be assessed. It is therefore recommended that a condition is imposed should the application be granted requiring further a health impact assessment(s) when the precise details of the house design are known. In addition reserved matter applications should include a commitment to build a proportion of homes to Approved Document M (Access to and use of buildings of the building regulations) with an appropriate level and percentages of each category (M4(1) Category 1: Visitable dwellings, M4(2) Category 2: Accessible and adaptable dwellings, and M4(2) Category 3: Wheelchair user dwellings) to be agreed with the local planning authority prior to commencement of works on site.

Air Quality and Odour

6.10 The baseline data evidence for this chapter is thorough, however, at this stage of the development it may be too early to claim that “It is predicted that the Proposed Development is unlikely to attract a large number of additional vehicles to the area surrounding the existing Waterbeach Station. The future do-something scenarios for both years 2021 and 2030 have been predicted to result in a negligible increase in NO₂. PM₁₀ and PM_{2.5} concentrations in the area surrounding the existing Waterbeach Station, including along Station Road.” without the commitment to address suitable

mitigation such as car free areas, low emission zones, travel planning for new residents etc. It also is difficult to have confidence that an increase of 4500 homes will have a negligible impact on air quality, both within the site and beyond into Cambridge City. I would suggest that expert advice is sought from the South Cambridgeshire Air Quality Lead and Cambridge City Air Quality Lead as Cambridge City any additional vehicles is likely to exacerbate poor air quality. It also important to acknowledge that although the air quality standards may not be breached, there may still be health impacts as there is no safe level for PM_{2.5}

Noise

- 6.11 The baseline data and evidence review for this chapter is thorough, however the HIA has not made reference to the mitigation measures contained in the Construction Environmental Management Plan (CEMP) submitted as part of the application.

Potential for Flood Risk

- 6.12 The HIA has identified the main health impacts associated with flooding but has not considered the wider implications due to climate change such as infectious diseases.

Crime and Antisocial Behaviour

- 6.13 The HIA has identified the health impacts associated with crime and fear of crime, including impacts on vulnerable groups, however the commitment to how crime will be designed out of the development is vague, for example the HIA could have stated that the “Secure by Design” principles will/have been used in the development to ensure a safer environment. In addition the HIA has not considered the crime associated with construction compounds, such compounds can become targets for crime or made reference to the mitigation measures contained in the Construction Environmental Management Plan (CEMP) submitted as part of the application. Future reserved matters applications such as design codes need to add greater detail on crime and design, and I would recommend that this is conditioned as part of any consent. Also the figures on page 44 (figure 6) of the HIA are too small to read.

Economy and employment

- 6.14 The HIA has identified the health impacts associated with access to employment specific to the development site and has considered the needs of vulnerable groups the link made between employment and health and wellbeing are supported.

Access to Services

- 6.15 The HIA has not identified the health impacts associated with education, health or community services and infrastructure specific to the development site, although the HIA has acknowledged the links between access to services and health.

Traffic and Transport

- 6.16 The HIA has not identified the health impacts that could be caused by transport planning specific to the development and masterplan, in addition, there should be links to the section on air quality and odour, particularly the impact of transport options on air quality. The HIA should have assessed the health impacts of the principles of connectivity and permeability specific to the development. The health benefits of active travel have been included and there is good suggestions on how active travel can be achieved within and outside of the development through the greenways.

Social Cohesion

- 6.17 At an academic/theoretical level the HIA has identified the health impacts associated with social cohesion but has failed to adequately link these to the specific development and master plan, in addition there is no assessment on the need for early provision of community facilities and associated mental health distress. There is no phasing plan for community facilities or commitment to provide facilities early within the development referred to within the HIA.
- 6.18 One of the findings from the learning from Cambourne report is to provide and incorporate community buildings early in the stages of the development. One of the downfalls in a new community is not having community halls/meeting places built early on i.e. Community halls, pubs, youth clubs, and sport provisions. There also needs to be provision for younger children such as play areas, skate parks etc.
- 6.19 Loneliness and mental health problems were issues coming out of Cambourne partly due to the initial lack of community buildings. It is important to recognise that that people moving into communities

may be moving away from their traditional support systems i.e. family and established communities with provisions to meet people and friends^{1,2}.

- 6.20 The need to provide a Community Development Officer is supported but the HIA lacks a commitment to provide this and therefore this provision should be secured through an appropriate Section 106 contribution.
- 6.21 The HIA has not assessed opportunities for a local community role in decision making and management of the place where they live.

Landscape/townscape and Tranquillity

- 6.22 The HIA has identified the health impacts associated with Landscape/townscape and Tranquillity

Areas missing from the HIA

- 6.23 The HIA has not assessed access to fresh food and food growing, for example there could be a commitment to facilitate the use of the local centres of the “Steads” to provide regular fresh food markets. There needs to be an overall approach to the provision of fresh food which encompasses purchase in retail outlets to the ability “growth your own” through the provision of allotments and/or sufficient garden space. There should be a consideration of healthy options for on-site catering for construction workers as well as through given to controlling fast food outlets.
- 6.24 The proposed care home has not been identified as vulnerable group.

Recommendations contained within the HIA

- 6.25 The recommendations contained in Table 19 (page 74) of the HIA are appropriate but as they are only recommendations not firm commitments they should be incorporated as conditions within the consent, if granted, where appropriate and practicable to do so or should be addressed through appropriate design codes, specifically:

¹ New Communities JSNA 2010 <https://cambridgeshireinsight.org.uk/wp-content/uploads/2018/04/New-Communities-2010.pdf>

² New Housing Developments and the Built Environment JSNA 2015 <http://cambridgeshireinsight.org.uk/wp-content/uploads/2017/08/New-Housing-Developments-and-the-Built-Environment-JSNA-2015.pdf>

1. There should be condition requiring the provision of convenient and secure cycle parking associated with residential areas at an individual dwelling level and at a “Stead” level, as well as at key destinations within the public realm.
2. The development should contain prominent cycle paths, and prioritise pedestrians over road traffic within the proposed development.
3. Active travel routes should lead to key destinations.
4. Housing tenure should be dispersed through the development and affordable housing should be subject to the same design and environmental standards as private housing to avoid concentrating low income and vulnerable people to one area.
5. Non private car transport options (bus, pedestrian and cycle) should be promoted between the existing village, the New Town of Waterbeach and surrounding centres of population and within the entirety of the Waterbeach New Town Development (i.e. both RLW and U&C land).
6. No residential dwelling should be built within an odour buffer zone surrounding the site of the proposed new WWRC site.
7. The construction compound and its boundary should be sited to minimise noise impacts on sensitive receptors.
8. Inclusion of a flood bund should be considered to reduce the risk of intermittent flooding.
9. Through design codes the development should adopt sustainable development principles, e.g. pedestrian friendly street lighting to ensure that a ‘critical mass’ of people are encouraged to use cycle and walking routes, to reduce the opportunities for antisocial behaviour and risk of crime.
10. Car parking and cycle storage should be secure to address the perceived threat of crime, particularly if they are located a distance from homes or residences.
11. Consideration to the types of employment should be undertaken prior to final design and construction.
12. Employment phasing should be considered to ensure that employment opportunities and access to services are created in parallel with housing construction. This phasing should show when the employment development will be delivered and how this will be phased with housing provision to provide a better balance between housing provision and job creation.

13. Bus, pedestrian and cycle routes should be established from early on in the construction phase to enable residents of the New Town to access services which are initially unavailable to them locally.
14. Routes (bus, pedestrian and cycle) between the existing village and New Town should be available as new facilities are established in the new town to enable residents of the existing village to access them.
15. The construction phases should cause minimal disruption to routes used by residents to access local services.
16. High quality, appropriate visible road signage, particularly in the “Steads”, should make it clear to visitors that roads are a shared space with Non-motorised users.
17. In order to promote the development of the new community as the development is phased, schools and health facilities and community facilities should be available at the earliest opportunity.
18. Local voluntary and community organisations should be promoted to encourage integrated communities.
19. Pepper pot social housing provision across the proposed development. In order to promote cohesion across the new community.
20. Allow for periodic consultation across the new town and existing Waterbeach communities to ensure residents (new and existing communities) are informed and involved and supported in decision making.
21. The proposed design code(s) should include available public meeting places, public realm public seating and toilets, safe streets, adequate street lighting, good transport links, local shops and services) in order to contribute to the creation and development of an age friendly community.
22. A community outreach worker/social liaison/community development worker should be provided through Section 106 contributions to act as an advocate for new members of the community and coordinate informal resources between the established community at Waterbeach and the new communities across the two proposed developments at Waterbeach.

- 23. Ensure safe access to Greenspace is maintained for existing residents of Waterbeach Village throughout the construction period.
 - 24. Integrate cycle and pedestrian routes into existing networks as early as possible to enable new residents to access Greenspace.
- 6.26 Install green infrastructure site wide during early construction phases to allow it to mature and help minimise the visual impact of later development phases.

7. Connecting Cambridgeshire

- 7.1 We would request the following planning condition be included regarding the need for Fibre/Fibre ducting to be developed during the construction of the development:

Prior to the commencement of any residential development, a strategy to enable a gigabit capable digital infrastructure for future occupants of the site shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall seek to ensure that upon occupation of a dwelling, either a gigabit capable fibre or ducting to facilitate the provision of a fibre enabled broadband service to that dwelling from a site-wide network, is in place and provided as part of the initial highway works (including fibre or ducting to existing live fibre services) and in the construction of frontage thresholds to dwellings that abut the highway, unless evidence is put forward and agreed in writing by the Local Planning Authority that technological advances for the provision of a broadband service for the majority of potential customers will no longer necessitate below ground infrastructure. The development of the site shall be carried out in accordance with the approved strategy.