

Appendix 2 - Cambridgeshire County Council Response to the Outline Planning Permission for Development at Waterbeach Barracks and Airfield (Planning Application Ref: S/0559/17/OL)

Waterbeach Outline Planning Application for up to 6,500 dwellings (including up to 600 residential institutional units), business, retail, community, leisure and sports uses; a hotel; new primary and secondary schools; green open spaces including parks, ecological areas and woodlands; principal new accesses from the A10 and other points of access; associated infrastructure, groundworks and demolition; with all matters reserved except for the first primary junction from the A10.

1. INTRODUCTION

- 1.1 The Council broadly supports the principle of development at Waterbeach in line with the Council's approach to the growth agenda and it is recognised that there is much that has been agreed at this point in the process. However, there are areas in the application where further detail, clarification or changes are required in order for Officers to advise Members that the development is reasonably mitigating its impact. Therefore it is necessary to place some objections on elements of the planning application until these matters are resolved to the satisfaction of the Council (see Table 1 below).
- 1.2 The Council would welcome further dialogue with the applicant to resolve these matters, as appropriate.

Table 1: Summary response

Service	Comments
Education	Objection
Floods and Water	Objection
Waste Management	Support in principle, subject to detailed matters and planning condition
Energy	Clarifications required
Sand and Gravel	Planning condition required
Highways	Object on highway safety grounds
Library	Support subject to s106 agreement
Transport Assessment	Holding objection until further information submitted and approved
Public Health	Holding objection until further information submitted and approved.
Ecology	Objection
Legal Obligations	Approach noted

Principle of Development of Policy Background

- 1.3 The planning application comes forward as part of a strategic housing allocation at Waterbeach in the context of national and local policy to support the delivery of sustainable development and growth. Key national policy includes the National Planning Policy Framework (NPPF), March 2012 which positively supports development, of good design, that is sustainable and which should go ahead, without delay.
- 1.4 As a brownfield site, which does not impact upon Green Belt, the applicant has sought to demonstrate how the OPA accords with the principles of the NPPF, and these issues will be tested in the South Cambridgeshire District Council (SCDC) report to planning committee in due course.
- 1.5 Key local policy is set out in the following documents:-
 - SCDC Core Strategy Development Plan Document (January 2007)
 - Development Control Policies DPD (July 2007)
 - Cambridgeshire and Peterborough Minerals and Waste Plan
 - Emerging South Cambridgeshire Local Plan
- 1.6 Set out below are the comments from the relevant County Service providers.

2. EDUCATION

- 2.1 The planning application makes provision for one Secondary School and three primary schools as part of the proposals. The application does contain two parameter plans, which are contained on one page reference 1330 GA 010002, which are for formal determination at this stage. The parameter plan sets out the broad locations for the schools within the site at a high level. No objection is raised to the flexibility given in the parameter plans at this stage and it is considered that this can be dealt with at the more detailed design stage. A response to key matters within in the application from a design, location and planning perspective is set out in this response.
- 2.2 **Primary School 1** is located to the north of the site. It is to be bounded by residential development on all of its borders bar the south-west, which will be bordered by a retail and community/leisure use. The indicative masterplan shows the school building to the south and it is situated away from but in close proximity to the primary road network to the west. The school is adjacent to an indicative community square to the south-west and an area of open space. The location of this primary school is supported in principle, subject to further consultation at more detailed design stage. The indicative layout as shown on the indicative masterplan, with the school adjacent to a square and public open space, but away from the primary street represents good urban design and is supported. The location of the refuse and recycling entrance to the east also appears appropriate and is supported in planning terms. The focus in terms of pedestrian priority for the school plaza and the raised table to reduce speeds is also supported.
- 2.3 **Primary School 2** is located to the west of the site. It will be bounded by residential development to the north, east and south, whilst a strategic landscape buffer lies to the west. A retail and community/leisure use will bound the site to the north-east. Of all the four schools this school is the only school on the edge of the overall site. CCC Education preference is for schools to form the heart of communities, with good connectivity to neighbouring residential land uses. However, accounting for the location of the other schools within the development, which are pepper potted around the site no objection is raised in principle to the school in this location. It will be a requirement for the school boundary along the east to be fenced and therefore strategic landscape planting will be required outside of the school site.
- 2.4 **Primary School 3** is located to the south of the site. Residential development will bound the site to the north, east, south-west and west, whilst a retail and community/leisure use will border the site to the north-east. No objection is raised to the location of the school, which appears to relate relatively well to the surrounding residential development. The indicative masterplan shows potential for three access points to the site, to the east, west and to the south. It would be a requirement for the school to provide staff parking and a refuse area separate from the key pedestrian access. On the basis of the school building being located to the east of the site, there will be a requirement at detailed design stage to provide a school access from either the south or north of the site for access to the school car park. CCC Education Capital would like to be consulted on this at the appropriate time. In

addition at this stage, little information is available on the level of traffic proposed to the street to the east of the school. It is the strong preference of CCC Education for this to be a minor access route and a primary street would not be encouraged to the east of the school entrance.

- 2.5 **The Secondary School** is located to the east of the site. Residential development will border the site to the south, north and east. A green corridor will bound the site to the north-east, whilst a retail use will be located to the south-east of the site. Five further retail uses are proposed to the west of the school, whilst two proposed community/leisure uses will bound the site to the west and south-west respectively.
- 2.6 CCC Education Capital have concern regarding Secondary School provision on the site and in the area and consider that the Secondary provision is not sufficient to meet the educational need for the area. The Secondary School is located on the edge of the new development, but has good connectivity to the main settlement to the south. If this Secondary School is to serve both the new and existing community its location would be appropriate. However, if a second Secondary School is required this would be better located centrally within the site.
- 2.7 The Design and Access Statement refers to the Parameter Plan for an illustration of the proposed building heights.
- 2.8 Primary School 1 is to be located in an area which will have maximum heights of 11 metres (two storeys), which is appropriate for a primary school. However, buildings to the west, south and east will have maximum heights of up to 17.5 metres (four storeys). It is noted within the Phase 1 Design Strategy that the Primary School is to be the main civic building and the heart of the neighbourhood both physically and functionally. Whilst no objection is raised to this in principle, given the buildings around the school are likely to be significantly higher than the school it will be challenging to create a landmark building for the school. This is a matter that will need to be considered in further detail at the more detailed design stage. However, it does need to be recognised that whilst the school building can form an important heart of the community, in design terms it will not be a dominant building within phase 1.
- 2.9 Primary School 2 is to be located in an area which will have maximum heights of 17.5 metres (four storeys). It is appreciated that the detailed design work for this area will be in a later phase of the development, however it should be recognised that the school is likely to be a maximum of two storeys and is therefore likely to be lower in height than the surrounding residential development.
- 2.10 Primary School 3 is to be located in an area which will have maximum heights of 11 metres (two storeys). However, immediately to the east the maximum heights are up to 17.5 metres (four storeys). In this regard the comments made in respect of Primary School 1, would also be relevant at the detailed design stage for Primary School 3.
- 2.11 The Secondary School is to be located in an area which will have maximum heights of 24 metres (six storeys). However, the retail area to the west will have maximum heights of 30 metres (eight storeys), whilst residential development to the east will

have maximum heights of 17.5 metres (four storeys). Up to six storeys for the Secondary School is considered to be appropriate and is supported in planning terms.

- 2.12 The Existing Features Plan is the only document within the application that highlights the levels of the site. However, as this plan only shows the existing, not proposed, site features, an estimation has been made as to where the schools are located on the plan.
- 2.13 All four proposed school sites have minor alterations in topography (no more than 50 centimetres) and therefore would be suitably located for the provision of sports pitches. On the basis that no significant level changes are proposed for the school sites, then no objection is raised in this regard. CCC Education Capital would want to be consulted on any amendments to the school's locations.
- 2.14 The Planning Statement sets out a requirement for the schools to achieve a standard of BREEAM Excellent. The current County Council standard requires BREEAM 'Very Good.' It is acknowledged that there is a policy in the emerging Local Plan for South Cambridgeshire, which sets out a requirement for BREEAM Excellent. This plan has not yet been adopted and therefore at this stage the CCC Education Capital would not accept any requirement for BREEAM Excellent. Any requirement for BREEAM Excellent would increase the cost of the delivery of the school, which may need to be reflected in the Section106 requirements for education delivery.
- 2.15 CCC Education would object to any condition or approved documents within the consent setting out a requirement for BREEAM 'Excellent' to be achieved.
- 2.16 All four proposed school sites are considered to have a negligible effect on the levels of noise. However, the school sites are to be assessed in further detail when the building and playground/outdoor teaching areas are known. The only school of concern is Primary School 2, which is located to the west of the site. However this is circa 85 metres from the boundary with the A10 and therefore it is unlikely that noise will be a significant issue.
- 2.17 It is clear that the application has considered the above. All four school sites are located at least 30 metres away from residential properties, and thus will have a minimal impact on residential amenity. Moreover, the school sites are adjacent to uses which produce minimal amounts of noise. Therefore, the teaching of pupils will not be affected by external noise.
- 2.18 The application is outline in nature, with minimal information on the approval of the school buildings other than that shown for phase 1 and as shown on the Parameter Plans. Overall the locations of the primary schools within the site are appropriate and the layout and location of Primary School 1, is good urban design and relates well to the surrounding land uses.
- 2.19 The matter of Secondary Education needs to be addressed in further detail as part of the overall education provision, before detailed comments can be made on its

location. CCC Education would want to be consulted on any revisions to the locations of the Secondary School.

- 2.20 Reference is made to the school buildings forming the heart and the hub of community. Whilst CCC Education Capital has no objection to this, it does need to be recognised that the school buildings are in locations where they are likely to be significantly lower in height than the surrounding buildings. Therefore, it will be more difficult to create landmark features without additional Section 106 funding.
- 2.21 CCC Education Capital would also object to any requirement to achieve BREEAM Excellent, given the current planning policy requirement relates to Very Good. It is considered that the requirement for BREEAM 'Very Good' can be sorted by way of suitably worded planning condition.
- 2.22 The Council is generally supportive of the approach suggested within the Socio-Economic Chapter for the opening of the new secondary school proposed as part of the U&C development (paragraph 4.5.28). There is sufficient capacity within surrounding secondary schools (currently) to accommodate the pupils from the initial phases of housing development. Officers would be supportive of the new school's opening date being managed to ensure that the impact on the current local schools are not unduly undermined. It is noted that there appears to be inconsistency about this approach within the application. The Design and Access Statement (section 7, page 81) suggests a commitment to early investment in secondary education provision, which may be seen as being counter the aspirations of the Socio-economic chapter.
- 2.23 The Council accepts in principle the approach for a site which can be located to allow expansion of the school site into the RLW site. We retain concerns about the appropriateness of a single secondary school to mitigate the impact of the new housing development. This is especially true in the context of the desire to support integration of the new and existing communities. The site area currently proposed is, understandably, linked purely to the impact of the 6,500 homes proposed as part of the U&C application. There is currently no indication that the site area will be sufficient to accommodate the impact of the existing community. It is accepted by the Council that there will be a need for further negotiations to secure the necessary site and buildings (including investment outside the S106 agreements)
- 2.24 The Council has objections to the lack of reference to the potential for securing either special education provision or post-16 provision. Given the scale of the housing development proposed across the wider Waterbeach new town, and the construction timescales, it is highly likely that there will be a need to secure additional capacity.
- 2.25 The potential requirement for this provision was highlighted within discussions around the DFD for the wider site. Given the uncertainties at this stage, officers indicated that having potential sites which, could if not required by education revert to housing would be an acceptable approach. There is currently no reference within the planning application for these provisions. There are real concerns that without a clear understanding of where these provisions could be located, if ultimately

required, reliance is being placed on the RLW land to deliver sites. This may not be possible within the context of this land, and there is, therefore, a need to secure a suitable assurance that provision can be secured.

- 2.26 Within the context of this point, the Council considers that the assessment of post-16 and SEN provision within the Socio-Economic chapter (paragraph 4.5.32/3) fails to consider the long terms requirements for post-16 and SEN. Whilst in the short to medium term this assessment may be accurate, it does not reflect the significant growth in demand for both types of provision, as a result of demographic changes; increasing demand from complex needs; changes in government policy around post-16 education; or significant levels of housing development across the wider area.
- 2.27 The Council notes that the Socio-Economic Chapter includes details in relation to the projected demography and, therefore, pupil numbers arising from the proposed development. In broad terms these are accepted. However, there will be a need to review these assumptions and projections as further detail about the housing mix emerges.

3. TRANSPORT ASSESSMENT (SUMMARY COMMENTS – FULL DETAILED RESPONSE PROVIDED SEPARATELY)

- 3.1 The application is seeking outline consent for 6,500 dwellings. A monitor and manage approach is proposed but insufficient evidence is provided to allow the County Council to assess the development, nor whether this approach is appropriate. The applicant needs to detail a robust, tested, costed mitigation package for the full development. This has not been provided.
- 3.2 The applicant has not provided sufficient evidence to suggest that a first phase of 1,600 new dwellings will not have a severe impact on the already congested network. Early phase cycling enhancements are not clear (presented as 'options') and we have concerns that the required modal split could be achieved.
- 3.3 The mitigation package is not clearly defined for either the early phase or future phases. There is no alignment or integration with wider proposals and the station.
- 3.4 Notwithstanding the concerns above about the scope, the technical information presented is not clear, the trip rates are not clearly detailed, nor the mode share. It appears that no assumptions have been included about reassignment. The internalisation rates are extremely high. The assumptions about parking are very low.

Existing Situation

- 3.5 The applicant has identified existing gaps in the transport network. Routes for walking and cycling from Waterbeach are not adequate and the bus service has a 20 minute frequency during the peak periods only. Accident data (which will need to be updated) identify some accident clusters. The current railway offer is at capacity in the peak periods in terms of on-train standing room, cycle/car parking.
- 3.6 Significant congestion is identified on the A10. There are already significant peak period vehicle flows through neighbouring villages which the County Council would seek to reduce through an upgrade to the A10.

The Application

- 3.7 Whilst the forthcoming Supplementary Planning Document will consider the overall layout and connectivity of the town, it is agreed that key cycle connections need to be provided to Waterbeach, Landbeach, Cambridge Research Park, Milton, Cambridge City Centre, Lode and Horningsea. To some extent this will be informed by the City Deal Greenways project, although other connections will need to be considered.
- 3.8 The principle of providing a network of segregated safe cycle routes along the primary roads, quiet roads and within green infrastructure is agreed. This could provide a dense grid of potential routes across and through the town which can cater for both leisure and commuting trips, and is based on the provision for Northstowe. The limiting of through routes for traffic as a principle is agreed, and will encourage walking and cycling for internal town based trips.

- 3.9 The provision of bus services for the town as a whole requires further consideration by the applicant and is currently without a comprehensive strategy. This is not accepted by the County Council without the findings of the A10 study and a detailed assessment of the operation of any future bus services. There is not an agreed bus service strategy for the early phases and fully occupied town at this stage.
- 3.10 Initial reaction is that residential car parking levels at a proposed average of 1.5 spaces per dwelling may be too low overall which could result in inappropriate on-street and overspill parking. However, it is recognised that a balance needs to be struck between overproviding (and potentially encouraging car use) and making provision that reflects current patterns of car ownership whilst seeking to encourage use of other modes. The parking ratio of 1.5 spaces per dwelling including 0.25 spaces for visitors as a whole is not recommended to be agreed.

Trip Generation

- 3.11 Overall it is not clear how the spreadsheet tool has been used and much more detail on the assumptions and methodology needs to be provided by the applicant for this approach to be agreed. As such the trip generation, trip assignment, level of internalisation and mode shares are not agreed. No analysis and assumptions of the existing and future mode shares for rail, bus and cycling are made by the applicant in terms of the application for 6,500 dwellings. The applicant should consider the mode shift characteristics that are existing, likely, desirable and potentially achievable with the development.
- 3.12 There is shown to be a significant impact of the development on the strategic road network including the A10 and A14. The applicant will need to undertake further analysis and modelling of the trips to cross check and evaluate the assessment that has been undertaken. Further modelling work will need to be undertaken of the impacts of the development and at specific junctions and locations.

Mitigation

- 3.13 To enable a decision to be reached for this application there will need to be clarity and agreement on the mitigation for the full development of 6,500 dwellings as part of this application, as well as that for the whole town of circa 10,000 dwellings. Consideration of the mitigation for each phase of delivery will need to be in the context of whether this mitigation complements or compromises the overall mitigation for the whole town.
- 3.14 The mitigation for Waterbeach new town is within the context of a wider corridor solution for the A10, City deal proposals for Milton Road and the area as a whole. As such the findings of the A10 study are key to determining the future mitigation for the current application and full development. The TA does not outline how potential strategic transport mitigation has been applied in the TA analysis.
- 3.15 The applicant proposes that the strategic mitigation is managed through a Monitor and Manage (M&M) approach for this application. M&M ensures that a separate TA is produced for each development phase and mitigation package agreed accordingly for that phase. A full indicative mitigation framework is still required

upfront for the whole development, but M&M provides flexibility to effectively respond to the changing transport context. Monitor and Manage has not been approved by CCC and would require the following:

- Knowledge of and agreement of the overall package of transport mitigation for the whole town (the 'end game' from which an M&M approach would work backwards);
- Knowledge and agreement of the delivery and viability of the package of transport mitigation for the whole town;
- Details of the interim and full mitigation / schemes associated with the new town that enable phases of the development to proceed;
- Agreement of the triggers for each phase of development;
- Agreement of the size of each phase of development;
- Agreement of the overall costs of interim and full mitigation / schemes associated with the new town that enable phases of the development to proceed;
- Agreement of the heads of terms of the S106 assigning contributions for the mitigation of the town;
- Agreement of the implementation strategy for mitigation associated with the new town.

3.16 No evidence of the above points has been provided by the applicant which would enable a satisfactory agreement to be reached.

3.17 In terms of the mitigation of an early phase of development, this will be subject to submission of a planning application for an early phase. However, it is evident that whilst the principles of most of the mitigation proposals outlined in the TA can be agreed, much greater detail is required from the applicant on the individual elements of a possible mitigation package. Without this detail it is too early to provide a view on whether the package is acceptable. The mitigation evidence needs to be based on clear and reasonable technical inputs (trip generation, trip assignment, level of internalisation and mode shares). The technical inputs have not been approved.

4. HIGHWAYS

4.1 The Highway Authority requests that the application be refused on the grounds of highway safety for the following reasons:

1. Dwg. No. 30509-001-076 Rev. E. The introduction of a toucan crossing onto a stretch of the A10 which is subject to the national speed limit of 60mph is unacceptable from the perspective of the Highway Authority. While the applicant has been in pre-application discussions with the Highway Authority which resulted in an in principle agreement that such a facility could be introduced, this was caveated with the need to reduce the existing speed limit to 40mph and to carry out a stage one road safety audit. These requirements have not been met. The above request may be overcome if the applicant:
 - i. Requests that the speed limit in the vicinity of the proposed toucan crossing be lowered to 40mph and that the required traffic regulation order is successfully implemented.
 - ii. That a stage one road safety audit is carried out and any/all problems identified within the same are mitigated and or resolved.
2. At page 136 of the Design and Access Statement, the applicant comments that if the toucan crossing at the Cambridge Research Park cannot be provided that an uncontrolled crossing will be provided. Given the potential level of use of this crossing by pedestrians and cyclists and the nature of the A10, this proposal is unacceptable as it will present an undue risk to the most vulnerable users of the highway. The above request can be overcome if the paragraph referring to the potential provision of an at-grade crossing is removed from the Design and Access Statement.

Other Comments

4.2 Dwg. No. 30509/2003/SK05:

- i. That the views of the County Council's Cycling Team are sought on the proposed width of the shared use footway/cycleway along the A10, specifically is a width of 3m acceptable in this location.
- ii. The proposed piping of the ditch adjacent to the A10 is unlikely to be acceptable to the Flood Water Authority and their views on this matter should be sought.

4.3 Dwg. No. 30509/2003/SK:06:

- i. The width of the shared use footpath must be given, this should at a minimum 3.5m and may need to be 5m in width (3m cycleway, 2m footway) depending on the predicted traffic flows.
- ii. The construction details should be excluded from the drawings as these conflict with the Housing Estate Road construction Specification June 2013.

- iii. The Denny End/A10 detail will require a stage one road safety audit before it can be considered even in principle.

4.4 Dwg. No. 30509-001-077 Rev A:

- i. This proposal will require a stage one road safety report before it can be considered by the Highway Authority.
- ii. The proposed use of a toucan crossing at this busy junction is disappointing considering the proposed size of the development and the desire to have high numbers of cyclists accessing the northern area of Cambridge. Initial discussions did consider a cycle bridge (in the style of a Bailey Bridge as a visual reference to the use of Waterbeach barracks by the Royal Engineers), such a feature would provide a 'seamless' connection to the proposed off road cycle routes and as such would undoubtedly encourage cycling as a primary commuter mode.

4.5 Dwg. No. 30509/M/001/017: the Highway Authority requests that this plan is not approved as part of any planning permission as it is premature.

4.6 Dwg. No. 30509/M/001/20: This is for Highways England to comment on.

4.7 The County Council is keen to ensure that crossing facilities over the A10 are appropriate, attractive and safe, and this will include looking at bridges, considering best practices from the continent. As it stands, the applicant has not proposed any bridges.

Transport, Volume 1 Transport Statement

4.8 Figure 10.3: It should be noted that cycles (and not just bicycles) are vehicles and as such this drawing needs to be better defined.

4.9 Para. 10.6.13: Shared use areas have to be carefully considered in particular where cycle flows may be high, as even this vehicular mode can be dominant over pedestrians.

4.10 Para. 10.6.15: the kerb face to crossings should be 6mm, this is accessible by wheelchair users and prevents ponding issues.

4.11 Para. 10.6.16: An illustration of the proposed car parking layout would be useful.

4.12 Para. 10.6.17: Floating bus stops have created concerns among certain disabled groups, in particular where cycle flows are high, while these stops may be acceptable in a wide range of locations they are not a panacea to all pedestrian/cycle/bus conflicts.

4.13 Para. 10.6.18: It would be useful if the cross-sections were included in the TA as a cross reference.

4.14 Fig. 10.4:

- i. Why is no connection shown to Horningsea and on to the eastern side of Cambridge (with Marshalls Etc., as major employers) being suggested/provided?

- ii. A key showing what the symbols mean would be useful, e.g. does the horse-shoe' shape over the A10 indicate a bridge or just an at-grade crossing.
- 4.15 Para. 10.6.20:
 - i. The paths will not be shared by all users, I assume equine riders and motor vehicles will be excluded.
 - ii. The use of a 3m wide shared use facility should be seen as a minimum requirement, and more space may be needed outside schools etc. depending on predicted flows, many NMU routes will have to be segregated and the minimum widths for these should be 3m for cyclists and 2m for pedestrians.
 - iii. The use of bollards for controlling access is quite unimaginative and other forms (trees etc.), should at least be considered.
- 4.16 Page 138 onwards: numbering of paragraphs repeated, i.e. there are two 10.6.1 etc.
- 4.17 Page 146 Car Parking: officers would request that it is made clear that the guidance within Parking What Works Where published by English Partnerships will be followed rather than Manual for Streets (where the designs are not suitable for anything other than smaller domestic vehicles).
- 4.18 Para. 11.3.3: While the aspiration to provide additional cycle parking within the village and at the existing railway station is welcomed, the deliverability of these suggestions must be tested, i.e. does the applicant control the land to be used and/or have the owner's consent?
- 4.19 Figure 11-3: this is unacceptable for a cross country route. The minimum width should be 4m.
- 4.20 Figure 11.4: a key would be useful to differentiate between the solid line and the dotted line. What do they signify?
- 4.21 Para. 11.5.27: the introduction of a controlled parking zone would require the extension of Local Authority Parking Enforcement (LAPE), which operates in the City of Cambridge only. Any change of area will need the consent of National Government.
- 4.22 Para. 11.6.29: Before any additional traffic signals along the A10 can be considered these will have to be approved not only in principle but in design by the Highway Authority's Traffic Signal team, so they cannot be considered as a given.
- 4.23 From a highway officer perspective the TA is predicated on the A10 study and therefore, avoids some difficult issues, the main obviously being what happens if the A10 study suggests limited interventions along the route or for that matter nothing at all? An A10 'do nothing' scenario should be considered and suggestions of how the site will mitigate its impact on the existing network presented.

Design and Access Statement

- 4.24 Page 103: officers feel that designating the existing route of the Causeway as specifically a leisure route at this stage is premature. This is the historic and

therefore 'natural' route though the site and associated landscape. While removing motor vehicles from this route would be welcome, it may become evident as the design of the site progresses that the use of the causeway as a main pedestrian/cycle route is desirable.

- 4.25 Page 131: The plan would benefit from a key, as various line types are used with no designations.
- 4.26 Page 133: The proposed street cross sections are acceptable in principle (it is noted that no dimensions are given). However, it should be noted at this early stage that the Highway Authority will not adopt any of the trees or areas of grass verge, unless the latter serves a highway function i.e. it forms part of a visibility splay.
- 4.27 Page 138: While welcoming the proposed provision of integrated bus routes though the site, these are not shown on the proposed cross sections on page 133. Bus routes can be quite land hungry (each lane should be at least 3.5m wide) which can have a significant impact on the street scene and as such this should be recognised by the applicant.
- 4.28 Page 140: The effectiveness of the management of car parking within the proposed development will in all probability require the introduction of on street waiting restrictions (in particular if the Rail Station is relocated). This would require the extension of Local Authority Parking Enforcement area, which as stated above will require consent of national government.

Highways Conclusion

- 4.29 From a Highway Authority perspective, the application as presented is heavily dependent on the outcome of the A10 Study and as such this creates difficulties in relationship to what measures to mitigate the impact of that the development will undoubtedly have are being proposed by the applicant.
- 4.30 The Highway Authority seeks that the applicant provide an outline, in the form of a tabulated list, of which measures will be provided and at which stage within the build out of the site should it gain planning permission. In particular measures to secure good connectivity to the wider network by cycle and walking should be given a constrained delivery window, for example when would the Mere Way improvements be provided? Prior to first occupation?

5. NEW COMMUNITIES

Community Facilities

- 5.1 It is important that these community facilities are suitable for activities for children and young people and their families. The community facilities will also need to be suitable for older people and for those with a disability (whether physical, sensory or learning). As a general rule community facilities are deemed as accessible if they are within 2km which is considered a reasonable walking distance. However, for young children, mums and dads with prams, older people, those vulnerable to mental health problems and the disabled this is can be a more difficult distance to walk so it is very important that location of community facilities in the new development are positioned with this in mind.
- 5.2 Facilities should be designed to complement existing facilities available in Waterbeach. The design of these facilities should be flexible and reflect the need to access public services as well as promote and aid the delivery of community led support. To ensure this, CFA new communities team would like to be engaged with the design of the community facilities to ensure needs of the community, especially those who are more vulnerable to social isolation, will be met.
- 5.3 In addition, it is generally believed that community facilities should be planned for the very beginning of the development and certainly in the early stages of the first phase. Therefore, the Council requires a commitment from the developer that some form of temporary indoor community facility, which could be part of another building such as a school, will be available from the beginning of the development so that there is space for information sharing and signposting to existing services and a space for the community to meet together in the early stages of the development. This is especially important for young families, who will need information about the local children's centre (for example) and those who are more vulnerable to social isolation.

An environment that promotes good mental health

- 5.4 Supportive of the commitment to community greens and the pedestrian and cycle routes (active transport) as these promote positive mental health. It would be beneficial in the promotion of positive mental health that there is also a commitment to providing adequate room sizes. There is considerable research around the positive and negative impacts of design on mental health. In particular there is the NHS Healthy New Towns Initiative which is delivering some key guidelines for the design of new communities. We would be looking at a commitment from the developers that these best practices will be reflected in the design of Waterbeach Barracks.

A physical environment that is accessible and easy to navigate

- 5.5 It is important that the physical environment is accessible and easy to navigate for all members of the community, especially those with dementia and older people who may be more likely to get lost if there is nothing distinctive about the

environment. The description of 'street and blocks' causes some concerns as the "logical, legible grid to the development" may make different parts of the development look the same leading to confusion.

- 5.6 The Council requires a commitment to include Landmark building that can be used at key locations to aid navigability and orientation and for different areas of the development to have recognisable themes, character or distinctiveness to make them more identifiable. We would also encourage that other landmarks are used, possibly using landscaping and public art, to create distinctive features throughout the development.
- 5.7 Also important that sensory and mobility needs are considered in the design, such as textured pavements, sensible placing of street furniture so it does not create a barrier and level pavements wide enough for ease of wheelchair use.

Housing

- 5.8 The Council would look for the developer to provide affordable housing in line with policy, to provide sufficient and suitable housing to support older people to stay in their own homes for longer (Older Peoples Accommodation Strategy, CCC). The developer is also asked to consider how housing can be suitable or promoted to the county's Key Workers and, as the development progresses, the developer is asked to consider how new homes designed for those with special needs could be included in the development.

Social integration and supporting residents

- 5.9 CFA would like a commitment to more formal support and community development, especially for those more vulnerable, to ensure all people are fully integrated and welcome in the new community. This can be achieved through things such as a commitment to provide community development workers and specialist workers for those who are more susceptible to social isolation (those who are at risk of developing mental health problems ,older people) and for children and young people. This is essential to avoid the high needs (much higher mental health needs, higher cases of domestic abuse, higher levels of crime etc.) that plagued the earlier development of other sites of this scale.

6. FLOODS AND WATER

- 6.1 Officers have reviewed the submitted Surface Water Drainage Strategy (Ref: 30509/4002, Rev B) dated February 2017 prepared by Peter Brett Associates LLP, and at present the County Council **unable to support** the application due to a number of outstanding issues which are outlined below.

Discharge Rate

- 6.2 The applicant must provide confirmation of the proposed discharge rate leaving the site. Whilst there is reference in the Surface Water Drainage Strategy to a discharge rate of 1.1l/s/ha (as requested by the Internal Drainage Board (IDB) due to capacity issues in the receiving system), it also suggests the applicant is in negotiation with the IDB to potentially increase this rate. In order to accept the strategy and suggest appropriate conditions we will require confirmation of the proposed final discharge rate.

Climate Change Allowance

- 6.3 The applicant has only used the central estimate of 20% to calculate the required storage. The applicant should use the 'upper end' of 40% in sensitivity analysis to assess the potential flood risk implications both on and off-site in the critical duration design rainfall event. When using the upper end figure it must be ensured that surface water is wholly contained on site and that flood hazard is within acceptable tolerances using the Defra/Environment Agency document (Flood Risk Assessment Guidance for New Development) (ref: FD2320).

Existing Barrack Drainage Network

- 6.4 In this area the applicant is not proposing to alter the impermeable area. It is therefore proposed that this section of the development will continue to drain as existing. It has been detailed within the drainage strategy that a portion of this site is believed to drain into soakaways; however section 4.7.4 and 4.8.1 of the surface water drainage strategy suggests that soakaways would be ineffective in this area due to the soil type and recorded high groundwater levels. It may therefore be inappropriate to continue to drain this part of the site to soakaways and alternative methods should be explored.
- 6.5 The applicant will note from the EA's surface water flood risk maps that in this area there is a high surface water flood risk. We need confirmation of how this risk will be mitigated following development.

Water Quality Treatment

- 6.6 On a strategic level the applicant has proposed to use ponds and conveyance ditches to manage and treat surface water. We are supportive of the use of these features however we have some reservations with the proposed design of the conveyance ditches. The majority of the ditches have a steep slope and there is no evidence to demonstrate that there will be a permanent level of low velocity water within the bottom of the ditches to provide the required treatment.

- 6.7 For example, the drawing 'Conveyance Ditch in Open Space' (Sheet 1 of 2, Drawing No: 30509/4002/142, Rev P0) details that all of the ditches will have a slope of 1:1.5. This is not in line with current guidance, as detailed in Section 17.2 of CIRIA SuDS Manual (C753), the side slopes of swales/ (treatment ditches) should be a maximum of 1:3 or 1:4 to allow for pre-treatment of lateral incoming flow. We also require detail of the longitudinal slope to ensure adequate treatment can be provided.

Additional Comments

- 6.8 The applicant has proposed to discharge some surface water into the existing Lake. Although we have no objections to this proposal, the applicant must provide an exceedance plan to demonstrate how flows may be directed in the event the capacity of the lake is exceeded. The use of a formal overflow should be explored.
- 6.9 The applicant has not proposed any level of treatment to surface water that will discharge into the Lake. To protect the water quality of the receiving Lake, the applicant should ensure that the run off is of an acceptable level this is to help ensure that current and/or future receiving water quality objectives are not compromised.
- 6.10 The proposed impermeable area varies within different sections of the surface water drainage strategy (including the Technical Note appended to the document). The applicant should amend this to reflect the actual proposed impermeable area.
- 6.11 Officers would be happy to meet with the applicant and their Drainage Consultants to discuss these concerns and agree an approach for the site.

7. PUBLIC HEALTH

- 7.1 The comments below should be taken in the context that this response is from Public Health within the County Council and that South Cambridgeshire District Council as the Planning Authority have the responsibility to score the submitted Health Impact Assessment (HIA) as per their local plan policy and Supplementary Planning Document on HIA.
- 7.2 The application, in particular the Health Impact Assessment, has been compared to the New Housing Developments and the Built Environment Joint Strategic Needs Assessment (JSNA) for Cambridgeshire¹.
- 7.3 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.
- 7.4 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.
- 7.5 Specific comments on the Health Impact Assessment are as follows.
- 7.6 Overall the HIA has not adequately assessed the potential positive and/or negative health impacts of the development. An HIA should:
- Appraise the potential positive and negative health and well-being impacts of the proposed development on planned new communities and the adjacent existing communities in the development area.
 - Highlight any potential differential distribution effects of health impacts among groups within the population by asking 'who is affected?' for the impacts identified.
 - Suggest actions / mitigations that aim to minimise any potential negative health impacts and maximise potential positive health impacts, referencing where possible the most affected vulnerable group(s).

¹ <http://cambridgeshireinsight.org.uk/joint-strategic-needs-assessment/current-jsna-reports/new-housing-developments-and-built-environment>

- 7.7 In addition, the HIA has not been adequately proof read prior to submission with errors in matching the objectives with the title narrative, i.e. Section 6 Mix of uses and Healthy Housing has mis-numbered the section headings, with A1 “Provision of quality housing of a mix of types and tenures helps meet peoples’ needs over a lifetime” being transposed with A3 “Provide a diverse mix of land uses”. This makes it difficult to assess which health impact has been identified and is being addressed.
- 7.8 The health and wellbeing objectives in Table 5.2 within the HIA are appropriate for the development. The acknowledgement that the health impacts will not be distributed universally and some people i.e. vulnerable groups may be potentially more vulnerable to negative effects is welcomed but the scope is too narrow, the vulnerable groups should be expanded geographically to include residents adjacent to the site and potential users of the services provided within the development site.
- 7.9 For ease of reference the comments on the HIA have been grouped under the six themes put forward in the HIA by the applicant i.e.:
- A. Mix of Uses and Healthy Houses;
 - B. Connectivity and Active Travel;
 - C. Open Space and Physical Activity;
 - D. Pollution and environmental risk;
 - E. Access to public and community service and jobs;
 - F. Supporting community wellbeing.

A. Mix of Uses and Healthy Houses

A1: Provision of quality housing of a mix of types and tenures which help meet peoples’ changing needs over a lifetime

- 7.10 Some of the health impacts have been identified such as the effect of inward commuting on reducing leisure time and the stress of travel, and the need to provide housing near employment. However 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 health impact assessment(s) when the precise details of the house design are known.
- 7.11 The commitment to building a proportion of homes to Approved Document M – Access to and use of buildings of the building regulations is welcomed however the 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) has not been specified with the application.

A2: Create an attractive neighbourhood through good quality design that helps create a ‘sense of place’ and allowance for flexibility of delivery over build out phases

- 7.12 Some of the health impacts have been identified such as the effect of “linking the Proposed Development to its past can help define the area and provide a ‘sense of place’ to new communities. This may have a positive impact on community identity and wellbeing”. However the HIA has not identified the health impacts that could be caused through the spatial design principles e.g. what the health impacts of higher densities around the “hubs” on the different population types.
- 7.13 The proposed approach at section 6.5 is welcomed as an approach but it is unclear if these are specific mitigation measures to mitigate adverse health impacts. I would recommend that these are conditioned as part of any consent, specifically the following listed in section 6.5 of the Health Impact Assessment
- Provide a proportion of new homes built to the accessible and adaptable dwellings standard 4(2) in Building Regulations Part M in each of the three categories to ensure that homes are adaptable to changing needs over a lifetime. This should be agreed with SCDC, in conjunction with Cambridgeshire County Council.
 - Provide new homes with at least minimum acceptable living space standards, suitable for their design for occupancy. These minimum acceptable living space standards should be agreed with SCDC, in conjunction with Cambridgeshire County Council prior to commencement of work on site.
 - Design and orientate new homes to aim to maximise natural daylighting and sun lighting, taking into account the need to avoid overheating, wherever possible.
 - Design development to incorporate ‘Secure by Design’ principles or equivalent.
 - Design later phases by drawing on ‘lessons learnt’ from initial phases to ensure that it creates a high quality place to live, e.g. design of homes, streets and open spaces. The Design Codes prepared for each Key Phase will help to achieve this aim.
 - Integrate affordable housing through the Proposed Development in terms of design quality and appearance.
 - Work with providers, SCDC and Cambridgeshire County Council to help identify the most appropriate use for the residential institution, for example for a residential care home.

A3: Provide a diverse mix of land uses

- 7.14 The HIA has not identified the health impacts that could be caused by the mix of land uses proposed. The HIA has however given commitment to the types of land uses that could be provided, i.e. cycle and pedestrian links to the Cambridge Research Park (CRP), and a commitment that early stage occupiers will have access to the recently re-opened community hall and sports centre on the former barracks. New open space will also be part of the first phase of development, as will pedestrian and cycle connections to the CRP which are supported. Links should have been made between land uses and health impacts such as reduction in mental ill health, reduction of Coronary heart disease and diabetes, possible

increases in road traffic injuries etc., these should then have been compared to the health profiles to see if any vulnerable groups are more impacted.

B. Connectivity and Active Travel

B1: Provision of local services

- 7.15 Some of the health impacts have been identified such as the effect on local services but they are not explained in any detail. The assessment should have considered which vulnerable groups may be adversely affected by the location of services, i.e. there may be a need to locate the “care home” facility closer to facilities rather than relying on proximity to a bus stop. There will need to be more detailed work on the provision of services at the right time in the phasing schedule to ensure local services can expand and/or relocate at the appropriate time.

B2: Improve walkability and cyclability and reduce car dependence, including supporting people to make sustainable travel choices

- 7.16 The HIA has not identified the health impacts that could be caused by transport planning, there should be links to the objective on “Pollution and Environmental Risk” particularly the impact of transport options on air quality. The HIA should have assessed the health impacts of the principles of connectivity and permeability. The health benefits of active travel have not been included and there is little detail on how active travel can be achieved within and outside of the development.
- 7.17 The proposed measures included in section 7.2.12 are welcomed but it is unclear if these are specific mitigation measures to mitigate adverse health impacts. It is recommended that these are conditioned as part of any consent, or a condition is imposed requiring that they are specifically included within the design codes for each phase of the development:
- Prioritising walking as the primary transport choice within the site, including through creating safe, attractive, and accessible walking routes through the application site, and beyond to allow walking to services outside of the development area;
 - The design of the overall road and street network provides a logical hierarchy of connections, which will be designed to provide sufficient space and a public realm to ensure a comfortable walking experience away from conflict from motor traffic or parked vehicles. The safe routes will be well-maintained and legible with lighting, signage and the use of quality materials;
 - Designing improved cycle routes through the development that are interconnected to existing external cycle links, with off and on-road routes;
 - Cycle routes that are suitable for both commuters and for leisure or other slower speed cycling, for instance through prioritising direct routes for the former and routes with more scenic interest and stopping places for the latter;
 - Cycle parking at least to the levels required by SCDC, to include space for larger cargo bikes in some locations (also useful for mobility cycles and trikes) and cycle rental hubs in key locations through the Proposed Development;

- Walkable access between the Cambridge Research Park and Denny End Road to the existing village and the station to the south;
- Off-site measures are also proposed including improved connectivity to Waterbeach railway station that seeks to improve cycle routes through the village to reduce hazards for road users, as well as new cycle parking;
- Other off-site cycle connectivity improvements including to Landbeach & Cottenham, Horningsea and Fen Ditton;
- Improved links for cyclists and pedestrians across the A10, which currently causes severance to movements by cyclists and pedestrians to settlements to the west, including to Cottenham Secondary School and Research Park (which is currently only really accessible by car). It is proposed to reduce this severance including through a new crossing to the A10 near the Research Park;
- Measures proposed to improve connectivity to Cambridge include connection through Cambridge Sports Lakes proposed development (subject to the development coming forward), improved and new cycleways along the A10;
- Soft measures will also be used to encourage cycling and walking such as interactive maps of routes and timings on the Travel Website for the site, promotional material and maps in Welcome Packs and as visitor information, Framework Travel Plan Coordinators will also work to promote and where possible offer incentives to cycle.

7.18 In addition the proposed measures included in section 7.2.14 are welcomed, however, there should be an assessment of the different types of active travel which will/could be provided as part of the development, e.g. an assessment of public transport, provision of electric charging points, moving toward electric bikes etc.

B3: Support safe streets suitable for pedestrians and cyclists and community interaction

7.19 The HIA has not identified the health impacts linked to pedestrians, cyclists and community interaction. Whilst the proposals are appropriate there is little detail and commitment shown to implement the suggestions. The vulnerable group section at 7.4 has failed to address the needs of older residents or any specific needs associated with the “care home” proposal.

7.20 The proposed measures included in section 7.5.1 are welcomed but it is unclear if these are specific mitigation measures to mitigate adverse health impacts. I would recommend that these are conditioned as part of any consent, or a condition is imposed requiring that they are specifically included within the design codes for each phase of the development:

- Providing clearly signposted links to the wider neighbourhood, such as shops, nearby parks and playing fields;
- Signposting will be provided to local walking and cycle routes, including differentiation between cycle commuting routes and more scenic but less direct routes;

- The safe routes will be well-maintained and legible with lighting, signage and the use of quality materials;
- The travel plan co-ordinator and community development worker will identify sustainable travel champions from the local community from the outset and work with new residents to promote the travel options available to them;
- Future detailed design stages will ensure new development is designed to take into account the need of all vulnerable people including disabled people to ensure new buildings meet suitable accessibility standards. This will include consideration of building design, paving materials (particularly important for visually impaired people on shared surface spaces), signage and road crossings;
- Design of routes, signage and choice of material will take into account the needs of the whole community. For example, those with vision impairment, those with mental disabilities (including dementia), who may favour straight sight lines, frequent signage;
- Preparation of a Delivery and Services Plan, Construction Logistics Plan (or similar) at the appropriate stages when details are known about construction activities to reduce risks and disturbances to other road users during construction;
- Implementation of the Framework Travel Plan through including the preparation of detailed plans at the relevant time for each Key Phase.

C. Open Space and Physical Activity

C1: Provide open space for informal recreation

- 7.21 The HIA has not identified the health impacts associated with open space. The commitment to the standards of provision is vague, the ANGSt standard is mentioned but only as a consideration not as a standard that will be followed. The commitment to “meet or exceed the local plan standards for informal open space” is also vague. The Health impact assessment will need to consider each area of open space in relation to proximity and access to/from residential areas to ascertain the potential health impacts.

C2: Provide formal recreation space including sports facilities

- 7.22 The HIA has not identified the health impacts associated with formal recreation space. The commitment to provide “facilities for sport and recreational use, including open space, will be provided at key stages as the population of the development grows” is vague, more certainty is needed as to the exact provision at each stage/phase of the development.

C3: Support greater physical activity as part of people’s lifestyle

- 7.23 The proposal to use the Sport England Active Design Principles are welcomed:
- 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

7.24 However the HIA has not identified the health impacts associated with physical activity as part of people's lifestyle. The HIA has not 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. This section should be linked to section B Connectivity and Active Travel.

C4: Create a high quality natural environment integrated into development

7.25 The evidence used is appropriate and as acknowledged in section 8.2.23 the detail of design is not yet defined, and as such the intention to ensure new planting is integrated throughout the scheme, including along new roads and through the provision of pocket parks, needs to be conditioned as part of any consent, or a condition is imposed requiring that they are specifically included within the design codes for each phase of the development. The HIA has not identified the health impacts associated with a high quality natural environment specific to the development site and the HIA has not assessed the needs of vulnerable groups.

C5: Access to fresh food and food growing

7.26 The proposal to consider the options for fresh food availability are welcomed in particular the use of civic squares for regular fresh food markets, and it is recommended that these options are either conditioned as part of any consent, or a condition is imposed requiring that they are specifically included within the design codes for each phase of the development. The HIA has not identified the health impacts associated with access to fresh food specific to the development site, however the needs of vulnerable groups have been considered. There needs to be an overall approach to the provision of fresh food which encompasses purchase in retail outlets to the ability to "grow your own" through the provision of allotments and/or sufficient garden space. The consideration of healthy options for on-site catering for construction workers is welcomed.

7.27 The proposed measures included in section 8.5.1 are welcomed but it is unclear if these are specific mitigation measures to mitigate adverse health impacts. I would recommend that these are conditioned as part of any consent, or a condition is imposed requiring that they are specifically included within the design codes for each phase of the development:

- Integrating features in the open spaces that encourage activity and exercise, such as use of 'trim trails' or outdoor gym equipment and a perimeter route for walking, running, cycling and horse riding;

- Providing the infrastructure necessary to help support people being active outdoors, this could include public conveniences, drinking fountains, seating, park cafes and outdoor Wi-Fi;
- Signage and information boards will be provided showing walking routes, direct routes, directions to other services and facilities, routes to Waterbeach village, the station and Cambridge, giving distances or walking times;
- Active building principles incorporated in new community buildings, schools and any apartment buildings. This includes space for cycle parking, shower facilities, and making stairs rather than lifts the most obvious way of moving between floors. Ensure all buildings have their main entrance from the pedestrian routes not the car park, and allow area for pushchair parking;
- Long term plans for ecology management, planting and protection of trees;
- Inclusive play space will be provided that is accessible and welcoming to disabled and non-disabled children. This needs to be considered at future stages of design;
- Long term maintenance of public open space will be incorporated into the Application Site management plans;
- Support community gardening schemes, allowing allotments to be used by community groups as well as individual residents. Community gardening can serve as a mechanism for combating social isolation and promoting social cohesion by contributing to the development of social networks. It also brings about positive health benefits which include improved access to food and increased physical activity;
- Provide new allotments in easily accessible locations on the Application Site, accessible to those who do not drive and close to a mixed tenure of housing;
- Consider ways to encourage new shops to include those that sell a range of healthy and fresh foods, including the option of fresh food markets in the civic squares across the development.

D. Pollution and environmental risk

D1: Reduce potential risks of climate change including from flood risk (surface and fluvial)

- 7.28 The HIA has not identified the health impacts associated with pollution and environmental risk, e.g. health impacts associated with flooding and climate change such as infectious diseases. The HIA has not assessed any impacts on vulnerable groups.

D2: Protect people from the harmful effects of pollution including air quality, noise/vibration and ground contamination

- 7.29 The HIA has not identified the health impacts associated with air pollution, noise etc. The mitigation measures proposed in sections 9.2.24, 9.3.2, 9.3.4, 9.5.1 and the ES are appropriate and should form conditions on any consent granted.
- 7.30 At this stage it is too early to claim that the “predicted changes in air quality as a result of the development are well below the relevant air quality objectives at all existing receptor locations” as the road layouts and the energy options have not

been decided. Also it is difficult to have confidence that an increase of 6,500 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 already has an Air Quality Management Area and any additional vehicles is likely to exacerbate the air quality problem. I understand the air quality/transport assessment has only considered impacts as far as the A14, the scope needs to be widened to include effects within Cambridge City.

E. Access to public and community service and jobs

E1: Allow access to healthcare from the initial phase

- 7.31 The approach of providing “at least a temporary GP surgery or health centre from initial phases of development” is welcomed.

E2: Allow access to community facilities from the initial phase

- 7.32 The approach to providing community facilities is welcomed but the precise detail will need to be agreed with the County Council, NHS and South Cambridgeshire District Council before any permission is granted.

E3: Allow access to education from the initial phase

- 7.33 The HIA has not identified the health impacts associated with education specific to the development site. Educational attainment is a predictor of longer term effects on health and wellbeing.

E4: Support access to jobs from the initial phase

- 7.34 The HIA has not identified the health impacts associated with access to employment specific to the development site, however the needs of vulnerable groups have been considered. Employment is a predictor of longer term effects on health and wellbeing.
- 7.35 The proposed measures included in section 10.5.1 are welcomed but it is unclear if these are specific mitigation measures to mitigate adverse health impacts. I would recommend that these are conditioned as part of any consent, or a condition is imposed requiring that they are specifically included within the design codes for each phase of the development:
- Ensuring all community facilities are well-signposted, with high quality footpath and cycle links.
 - Continuing to work with service providers to help develop new communities and support new residents.
 - Appointing a Community Development Officer to encourage participation in community groups by new residents.
 - Providing a single information point for community events and classes, including a newsletter to keep residents informed of their options and someone to answer their queries.

- Enabling temporary vacant retail or commercial units to be used by residents and community groups as temporary spaces for community development while tenants are being found or more formal facilities are under-construction.
- Fast internet access will be available on site from the first phase of occupation.
- Continuing to work with stakeholders and providers to identify the trigger points and needs for provision of community services and schools, as set out in the facilities statements.

F. Supporting Community Wellbeing

F1: Help reduce social isolation including supporting access to community facilities and community groups from the first stage of occupation

- 7.36 Although the evidence used is appropriate the HIA has not identified the health impacts associated with social isolation specific to the development site. In addition the HIA should consider the interaction between the existing Waterbeach village and the new development. The need to provide a Community Development Officer and provision of a welcome pack should be conditioned as part of any consent.

F2: Opportunities for local community role in decision making and management of the place where they live

- 7.37 The HIA has not identified the health impacts associated with the opportunities for people to become involved in decision making. However U&C's ongoing commitment to community involvement through the lifetime of development is welcomed.

F3: Integration of existing and new communities

- 7.38 The HIA has not identified the health impacts associated with integration of existing and new communities, although the proposed measures are appropriate.

F4: Reduce opportunities for crime and fear of crime

- 7.39 The HIA has not identified the health impacts associated with crime and fear of crime, however the needs of vulnerable groups have been considered. The principle to add greater detail in the design codes for each key phase is welcomed and I would recommend that this is conditioned as part of any consent.
- 7.40 In addition the proposed measures included in section 11.4.1 are welcomed but it is unclear if these are specific mitigation measures to mitigate adverse health impacts. I would recommend that these are conditioned as part of any consent, or a condition is imposed requiring that they are specifically included within the design codes for each phase of the development:
- Supporting community events throughout the development phase, such as community fetes, fairs and markets.
 - Supporting the development of informal community meeting spaces, such as pubs and cafés, parks and playgrounds.
 - Continued use of the website (www.waterbeachbarracks.co.uk) to keep residents informed of what is happening in the area. This should include

information on consultation on ongoing planning applications (while ongoing), as well as sections for the community on activities and events as well as contact details for supports and contacts during construction. Print information should also be made available, including direct mailings as well as information points at community facilities. Print information will also be made available from the quarterly newsletters, direct mailings if required, updates in the village newsletter and information points at community facilities.

- Consultation and advice on secured by design principles will be provided for residential and commercial areas as well as specific measures for schools. In addition to other measures to reduce risk of crime and fear of crime such as use of lighting, clear sight paths, natural surveillance and encourage activity on routes through the scheme.
- Help reduce the potential for or perceived anti-social behaviour by young people by promoting community groups, activities and meeting spaces within the development aimed at these groups so they have somewhere to spend their time outside of the home. This could include working with Community Development Officers to encourage older and younger people to mix and gain an understanding of one another.
- Work with local providers to enable a Community Development Officer to be in place to help guide the type of community facility required and establish methods of community engagement.
- Provide new residents with welcome packs that provide links (including named contacts) to help people become acquainted with the area and its history and the local community activities. This can be of benefit to both new residents and the community members assigned to help people integrate.
- Identify measures to encourage community participation, kept under review during the lifetime of the project, with details of local community representatives in the governance of the development, including helping to manage community facilities, events and managing any community funds. Work should be alongside representatives of the local Councils.

Public Health Summary

- 7.41 In short the HIA falls short of what an HIA should be. It has not identified the health impacts specific to the application site and the causal pathways. The approach from Urban & Civic is fine and the mitigation measures are acceptable so officers have confidence that the health impacts, when properly identified, will be properly addressed. Officers therefore suggest we put in a holding objection until we can agree a way forward with U&C and SCDC to correctly identify and mitigate the health impacts and to ensure the HIA influences the master plan and the future design of the development.

8. MINERALS AND WASTE

- 8.1 The outline planning application includes a Waste Management Strategy which provides a good outline as to the overall approach to be taken for waste management at this site. However, there are details which cannot be provided at this stage and therefore provision is made for Site Waste Management Plans to come forward in due course; and for completed RECAP toolkits Assessment (both of which are required by the Adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy, Policy CS28).
- 8.2 In order to secure the above required information the following planning condition is put forward to be included with any consent granted:

Detailed Waste Management and Minimisation Plan

Prior to the commencement of development 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:

- i. Construction waste infrastructure including a construction material recycling facility to be in place during all phases of construction;*
- ii. anticipated nature and volumes of waste and measures to ensure the maximisation of the reuse of waste;*
- iii. 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 for use both within and outside the site;*
- iv. Any other steps to ensure the minimisation of waste during construction;*
- v. the location and timing of provision of facilities pursuant to criteria i) to iv);*
- vi. Proposed monitoring and timing of submission of monitoring reports;*
- vii. 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;*
- viii. a RECAP Waste Management Guide toolkit shall be completed, with supporting reference material; and*
- ix. 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.

Energy Centres

- 8.3 The outline planning application includes the provision of two energy centres, albeit assumed as ‘associated infrastructure’ for the purposes of the development description by the Local Planning Authority. These two energy centres appear to be intended as facilities for local energy generation; and the planning application suggests that the precise technology to be employed will be addressed through reserved matters. The potential range of fuel includes gas, biomass, waste through anaerobic digestions and waste combustion, all of which could introduce very different feedstocks and have different impacts in relation to traffic generation, odour, noise and general amenity issues that will need to be given full consideration. This part of the outline proposals needs further clarification and consideration for the Waste Planning Authority (WPA) to provide meaningful comment. Proposals for Energy from Waste facilities would normally fall under the remit of the Environmental Impact Assessment Regulations (EIA) and require detailed consideration prior to being determined by the WPA.
- 8.4 In this context, and for information, an EIA scoping request has been received and is currently being considered by the County Council as Waste Planning Authority for an Energy from Waste facility at Amey’s Waterbeach Waste Management Park, Waterbeach. The scoping request relates to the 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.

Sand and Gravel

- 8.5 The development site falls within the Sand and Gravel Mineral Safeguarding Area and there are significant deposits of sand and gravel at the site. Whilst this will not prevent development going ahead if the Local Planning Authority is minded to grant planning permission for these outline proposals, the County Council as Mineral Planning Authority is concerned to ensure that any mineral extracted during the course of development is put to a sustainable use i.e. either used in the development itself or potentially taken off site to be processed and used for aggregate purposes (in the event of the latter advice should be sought from the County Council as this will require planning permission from the County Council as the Mineral Planning Authority). Ensuring the sustainable use of mineral extracted during redevelopment is consistent with the principles of the adopted Minerals and Waste Core Strategy (Policy CS42) which addresses incidental mineral extraction. The Environmental Statement acknowledges this (Chapter 13) and states that ‘consideration will be given to the sustainable reuse of minerals excavated from the

site during construction'. It is suggested that this will be taken forward through the CEMP. In order to ensure that this is addressed satisfactorily, and through all the construction phases of the development, it is suggested that this could be secured through a clause requiring this in the planning condition which will require a CEMP.

9. LIBRARY

Interim Provision

- 9.1 Provision of a Micro library, rent free in a shared community building or a new mobile stop to serve the development is required to provide interim provision, until the permanent provision is provided.
- 9.2 Although a matter for the s106 negotiations, officers suggest that a trigger of 1,000 new residents (equivalent to 400 dwellings) is an appropriate point at which the infrastructure is required.
- 9.3 A financial contribution of £28.92 per head of increased population (equating to a contribution of £28,920) would provide for the above infrastructure.

Permanent Provision

- 9.4 1000sq m of operational library space in a shared community facility plus 25sqm library workspace (which can be in a shared staff space) is required to mitigate the impact of this development.
- 9.5 Although a matter for the s106 negotiations, officers suggest that a trigger of 14,000 new residents (equivalent to 5,600 dwellings) OR whenever the Community facility is built, whichever is the sooner, is an appropriate point at which the infrastructure is required.
- 9.6 A financial contribution £97 per head of increased head of population (equating to a contribution of £1,358,000) OR fit out costs (at the time of handover) if the facility is built by the developer, will provide for this infrastructure.
- 9.7 Officers would expect the following Library and Lifelong Learning Facility specification to be agreed to by the developer of the facility
- 9.8 Library Area specification:-
- which is on a single level and at ground floor;
 - which has access to shared meeting facilities, staff facilities, buggy parking, delivery access/a delivery parking bay and customer toilets;
 - into which there are good clear views in from the street or from within the community building;
 - offering the potential for self-service opening whenever the community building is open;
 - having a layout offering good sight lines with opportunities if possible for discrete zones for different functions and for flexibility in use of space;
 - having sufficient power and data connections to enable installation of appropriate information and communications technology and future changes in layout.
- 9.9 The community building should also be accessible on foot, by cycle and by public transport and in an area of high footfall. The library should also have at least 1 designated disabled car parking space.

10. ECOLOGY

- 10.1 Officers have strong concerns that the application fails to adequately demonstrate that there will be no adverse impact on ecology, particularly on wildlife sites, protected species and priority species/habitats. Consequently, the application does not accord with SCDC Development Control Policies (adopted July 2007) policy NE/6 Biodiversity, nor national planning policy and accompanying ODPM Circular 06/2005: Biodiversity and Geological Conservation which states that the level of impact of development on protected species and priority habitat/species is a material consideration in the planning process.
- 10.2 Officers recommend that SCDC consults their ecological expert, as well as the Wildlife Trust and Natural England (as appropriate), to provide detailed comments on our concerns highlighted below:
- i. Potential adverse impact on landscape scale Green Infrastructure projects, including Wicken Fen Vision area, and other statutory/ non-statutory wildlife sites with designatory features sensitive to increased recreational pressure (e.g. ground nesting birds, trampling), such as Cams Washes SSSI
 - No detailed evidence has been provided to substantiate the applicant's claims that there is likely to be no adverse impact on these sites
 - Advice from Natural England and National Trust should be sought on this matter.
 - As part of the development of the SPD, we would strongly recommend that a detailed assessment of recreational pressure on these wildlife sites be conducted to identify a threshold as to if / when an impact is envisaged
 - ii. Potential adverse impact on nearby County Wildlife Sites
 - iii. Lack of detailed survey work for protected species
 - All evidence to support protected species assessments, including protected species survey report, must be provided. All survey work should accord with industry best-practice guidance and relevant British Standards
 - iv. Impact on farmland birds, particularly in relation to cumulative impact of other developments within South Cambridgeshire
 - No evidence has been provided to substantiate the applicant's claims that there is sufficient capacity within the local area to accommodate farmland birds displaced from the application site and therefore, the 'worst case scenario' must be applied and assume that such habitats are at carrying capacity.
 - We would expect any large developments within South Cambridgeshire to secure an acceptable level of off-site mitigation measures for farmland

birds, in keeping with recent SCDC planning permissions for strategic sites (e.g. North-West Cambridge)

- v. Lack of quantitative data to demonstrate the scheme will result in net gain in biodiversity (or at least no net loss), including protection / enhancement / creation of priority habitats
- Defra's Biodiversity Off-setting Matrix should be used as a basis for this assessment.
 - The level of long-term aftercare / maintenance of biodiversity features (including habitats) should ideally be secured in perpetuity. At the very least, it must allow a sufficient period of time to allow habitats to establish and secure the 'future target value' / high quality habitat assumed within the ecological assessment – see Appendix 2 of Defra's (March 2012) Technical Paper: the metric for the biodiversity offsetting pilot in England.

11. ARCHAEOLOGY

- 11.1 Officers do not object to the application, but would recommend that conditions are put in place to ensure the effective management of heritage assets which will be impacted by the development.
- 11.2 The site is located within a landscape of high archaeological significance. The site sits at the junction of a significant Roman road and the Car Dyke canal; an important junction on the regional Roman transportation network. Consequently the surrounding landscape developed in the Roman period as a significant centre for settlement, industry and commerce, which is reflected in the surviving archaeological resources. In the medieval period, the site was located between the important religious house Denny Abbey to the north, the contemporary settlement at Waterbeach and the site of Waterbeach Abbey. Elements of this landscape, including parts of the Car Dyke, Denny Abbey, Waterbeach Abbey and the shrunken medieval village of Landbeach, are considered to be of national importance and are designated Scheduled Monuments. Extensive undesignated heritage assets also survive in the landscape, including within the proposed development area.
- 11.3 The applicant has commissioned and undertaken an archaeological evaluation of the site, including desk based assessment, geophysical survey and trial trenching. Although there are areas of substantial disturbance from the 20th century military use of the site, the surveys have identified significant archaeological assets within the site, mostly relating to Roman settlement, transport and agriculture. There is also potential for evidence relating to the late prehistoric, Saxon and Medieval periods to survive within the site.
- 11.4 With regards to the archaeological resource, the ES suggest that the development will have a moderate adverse effect on below ground archaeological deposits. Considering that the identified archaeological assets will be completely destroyed where there are direct construction impacts, we would suggest that the impacts will be severe adverse. However, the surviving archaeological resource has been disturbed from previous land use and, in accordance with the ES proposals, we would consider mitigation of the development impacts through excavation and recording of the affected assets, and public presentation of the results to be an appropriate strategy.
- 11.5 There are areas of significant archaeology within the application site where preservation in situ is proposed, including The Causeway, Soldiers hill and Car Dyke. The ES suggests that these will be protected from physical harm through the management of construction traffic, site hoardings etc. as necessary. We would recommend that an appropriate level of protection is secured through inclusion in a Construction Environment Management Plan, which should also be secured by condition.
- 11.6 The ES outlines plans to reduce the impact of the development on the built heritage and setting of the designated heritage asset Denny Abbey. While we consider that there are opportunities to improve access and increase public awareness of Denny

Abbey, we would recommend that Historic England are consulted with regard to the potential impacts on the setting of the designated assets. With regard to the proposed tree planting, this must take into account the potential for impacts on undesignated heritage assets.

- 11.7 Officers acknowledge and support the proposal within the ES to implement a full recording programme of the World War II structures and would recommend that this is secured by condition.
- 11.8 Officers recommend the following conditions to secure the effective management of the undesignated heritage assets within the application area.

Archaeology Condition

No development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition/development shall take place other than in accordance with the agreed WSI which shall include:

- *the statement of significance and research objectives;*
- *The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works*
- *The programme for post-excavation assessment and subsequent analysis, publication & dissemination, and deposition of resulting material. **This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.***

Built Heritage Condition

No development shall take place until the applicant has secured the implementation of a programme of historic building recording in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority.

- 11.9 Officers would also recommend the inclusion of the following clause in a condition for a Construction Environmental Management Plan
- 11.10 The site wide CEMP shall include archaeological protection and mitigation measures to be implemented during the construction process.

12. PLANNING OBLIGATIONS

- 12.1 This document sets out the context for the s106 agreement that will be secured to any consent granted for development.
- 12.2 Particular reference is made to a monitor and manage approach for transport which officers can only support SUBJECT TO a number of caveats which are set out in the Transport Assessment response above.
- 12.3 Officers acknowledge that the model used at Alconbury Weald has merit and therefore has no objection to the broadly the same approach for this application.
- 12.4 Officers highlight and support, as raised in section 2.2 of the Legal Obligations document, that whilst the ability for each development to provide for its own needs is sound, flexibility may be necessary, where strategic infrastructure is providing for the applicant site and adjacent site. An example of this may be the secondary school provision.
- 12.5 Officers consider Annex C as a starting point for s106 negotiations and therefore this schedule of items will need to be reviewed regularly to ensure it meets the needs of the development before it is finalised and agreed.

ENDS

If you wish to seek clarification on any comments in this note, please contact one of the following officers:-

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OR

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