

Fenland Infrastructure Delivery Plan (IDP)

Representations received during targeted consultation (16th November – 14th December 2015) and changes made to the IDP following consultation

Introduction

This report sets out a summary of the representations received during the targeted consultation on the Draft 'Fenland Infrastructure Delivery Plan (IDP) together with the Council's response to these comments. The report also sets out changes made to the IDP which were necessary or relevant as a result of comments received through the consultation process.

Fenland District Council wishes to thank all those who took the time between 16th November and 14th December 2015 to comment on the draft update of the 'Fenland Infrastructure Delivery Plan (IDP)'.

The IDP has been prepared to support the Local Plan, specifically Policy LP13 – 'Supporting and Managing the Impact of a Growing District' and together with the adopted 'Developer Contributions SPD' will be used to assist in reaching decisions on planning applications, seeking S106 contributions, identifying funding gaps, and delivering sustainable growth in Fenland. The IDP will provide information to developers, planning officers, stakeholders and providers regarding the infrastructure needed to support growth and which are likely to form the basis for S106 contributions.

Consultation

The Fenland Infrastructure Development Plan supports Policy LP13 in the Local Plan. It is in effect an evidence document rather than a Development Plan Document (DPD) or Supplementary Planning Document (SPD) and therefore does not require the same level of consultation that would be required for a DPD or SPD. Nonetheless the Council considered it important that key stakeholders and relevant organisations and bodies should be consulted in order to provide an opportunity to put forward up-to-date information and inform the IDP's contents. As a result a four week consultation was held which was in line with the Council's minimum length of consultation as set out in its Statement of Community Involvement (June 2013). Relevant county, town and parish councils were consulted as well as statutory and non-statutory infrastructure providers. Members of the Fenland Developers Forum and other developers / planning consultants whose details are held on the planning policy database were also consulted. Finally all Fenland Councillors were advised of the consultation.

Changes to the IDP

The table below summarises all the comments received and how Fenland District Council responded to the issues raised. The table also shows any changes made to the IDP as a result of comments received. Where there are changes or no changes were made, this is clearly indicated. Any changes to the IDP are recorded in 'Change to IDP' column.

Respondent	Comment	FDC Response	Change to IDP
COM-1 Colum Fitzsimons Cambridgeshire County Council	The County Council supports the District's approach to regularly reviewing and updating the IDP and we will continue to work together to support the delivery of infrastructure arising from development and population change in Fenland. Suggested changes to the IDP are included in an amended version relating to costs and provision of education, libraries and transport.	Noted. CCC seek changes to the education and library requirements in particular and confirm that the smallest settlements will not be subject to an improvement in mobile library services: Church End, Collett's Bridge, Eastrea, Foul Anchor, Pondersbridge, Tholomas Drove and Tydd Gote	Changes made to text at paras 4.11, 4.13, 4.15, 4.29, 4.31, 4.82, 4.83 and 4.86, and in the Schedule where relevant for all settlements.
COM-2 Stephen Faulkner Norfolk County Council	Norfolk County Council welcomes the opportunity to comment on the above Fenland Infrastructure Delivery Plan and supports the purpose of the document, which will help coordinate infrastructure provision needed to support housing and employment growth in the District up to 2031.	Noted.	No changes
COM-3 Stephen Faulkner Norfolk County Council	Cross-boundary Infrastructure Comments - Education: Paragraph 4.75 (page 21) on primary schools should have reference to the need for cross boundary working on the delivery of education provision in and around Wisbech. The paragraph should make specific reference to planned housing earmarked across the border in Emneth/Walsoken (adjacent to Wisbech) for 550 dwellings, which lies	Noted.	Additional text added at 4.87 and 4.89 and IDP Schedule amended

	<p>within the administrative boundary of King’s Lynn and West Norfolk Borough Council. It should indicate that any new education facility/school will need to have regard to wider housing growth outside of the District and indicate that discussion/s have taken place with the neighbouring local education authority (Norfolk County Council) regarding the delivery of education provision. This would assist in demonstrating that Fenland District Council has satisfied its Duty to cooperate as set out in the Localism Act (2011).</p> <p>Paragraph 4.76 (Page 21) – while some reference is made in this paragraph to infrastructure pressures arising from outside of Fenland (adjacent to Wisbech), it is felt that similar amended wording as above is needed to this paragraph in order to demonstrate that the District Council has satisfied its duty to cooperate.</p> <p>Infrastructure Schedule (Page 63) Reference WIS 2.4 And 2.5 – It is unclear from the schedule and these two reference whether there are two no. 2 FE primary schools being proposed in Wisbech or just one. The schedule should make it clear the number of new primary schools needed to support housing growth in and around Wisbech. In addition it would seem sensible to amend the schedule for the two references above and WIS2.6 (under the heading “identified”) to include reference to Norfolk County Council (education) along-side the Cambridgeshire County Council reference.</p>		
COM-4	Cross-boundary Infrastructure Comments –	Noted	Additional text added at 4.15

<p>Stephen Faulkner Norfolk County Council</p>	<p>Transport: The IDP transport section is very comprehensive. For Wisbech there are 3 Trunk Road junctions with connection to Norfolk roads: - Lynn Road, Broad End Road and Elm High Road. The 'lead' is identified as Highways England/NCC (page 69), which is felt to be correct.</p>		
<p>COM-5 Janet Nuttall Natural England</p>	<p>Notes and welcomes the IDP which includes funding and delivery of green infrastructure / open space, although smaller infrastructure projects are addressed through development master plans. Support the recognition of the deficit in open space in the district and the provision of strategic open space in the form of a Country Park in March. Fully support proposals for delivery of green infrastructure and wildlife/biodiversity projects across the district. It would be useful to see implemented and proposed projects on a map in future iterations of the IDP.</p>	<p>Noted. The provision of a map indicating proposed and implemented projects will be considered (subject to available resources) in future versions of the IDP.</p>	<p>No changes</p>
<p>COM-6 Tom Gilbert- Wooldridge Historic England</p>	<p>Section 2: What is meant by infrastructure? The historic environment and specific heritage assets can form part of different infrastructure types. Roads and other transport facilities may include historic structures (such as bridges); school facilities can include historic buildings; and open/recreational spaces can contain archaeology and/or form part of the character and setting of designated heritage assets such as listed buildings and conservation areas. Heritage assets can also be described as community infrastructure in their own right (such as specific tourist attractions). We hope infrastructure projects can be identified</p>	<p>Noted. Policies in the Local Plan and national guidance underline the importance of retaining heritage assets including when these comprise infrastructure.</p>	<p>No changes</p>

	that have a positive effect on the historic environment (such as improvements to transport infrastructure and public realm, and investment in museums, visitor centres and markets), while any harm to individual heritage assets as a result of specific projects can be kept to a minimum.		
COM-7 Tom Gilbert- Wooldridge Historic England	Section 4: Infrastructure requirements and constraints This section helpfully notes the potential for heritage assets to form part of cultural and heritage attractions (paragraphs 4.86-4.88) as well as part of green infrastructure and open space (paragraph 4.90). As noted above, it can also form part of other infrastructure types and be affected by specific projects. We have not been able to assess the various infrastructure projects mentioned in this section, although we would note that road improvements in the main towns could have an impact on the historic environment. We commented on the draft Wisbech Market Town Transport Strategy in July 2014, and a copy of our response to Cambridgeshire County Council is annexed to this letter.	Noted. Policies in the Local Plan and national guidance underline the importance of retaining and not adversely impacting on heritage assets.	No changes
COM-8 Tom Gilbert- Wooldridge Historic England	Section 8: Infrastructure Delivery Schedule As with Section 4, we have not been able to assess the various infrastructure projects within the tables. We note high street and town centre improvement projects in March, Chatteris and Wisbech, all of which have the potential to benefit the historic environment and dovetail with other related projects.	Noted	No changes

<p>COM-9 Elizabeth Mugova Environment Agency</p>	<p>Water Supply Section 4.35 of the Utilities chapter states that: "The Stage 1 Outline WCS concluded that there are adequate demand control measures proposed and sufficient capacities in current water resource options managed by AWS within Fenland to cater for the demand for water created by growth." Further to the release of the Stage 1 Outline WCS, our duties regarding the implementation of the Water Framework Directive legislation has meant that the conclusions reached in the Outline WCS may no longer be valid. Anglian Water may not have the spare capacity on their abstraction licences in order to continue to supply the growth that is forecast.</p>	<p>Noted. FDC accepts that as a result of the Water Framework Directive legislation the findings of the Stage 1 Outline WCS will need to be treated with caution as AWS may no longer have spare capacity on their abstraction licences.</p>	<p>Changes to para 4.37</p>
<p>COM-10 Elizabeth Mugova Environment Agency</p>	<p>Water Quality/Wastewater The IDP is an accurate reflection of the outcomes and conclusions from the Water Cycle Study Stage 2a. However, the WCS was released in 2011 and much of the data and information used in the report is likely to have changed. The individual infrastructure issues identified might remain the same, but the scale of those problems and/or the urgency with which they need to be addressed may have changed. Also, there is no indication in the IDP of how the quantum of growth proposed in locations across the District has changed since the WCS was written. As such, there is no way of easily checking if or how the pressures on wastewater infrastructure might have changed. The WCS does advocate an annual review of the information (7.3.2), but as far as we are aware this has not happened. Several of the studies and plans</p>	<p>Anglian Water has provided an update of the infrastructure requirements at all of the Water Recycling Centres but do not indicate that any changes are needed. The benefits of a Stage 2b (more detailed) Water Cycle Study are acknowledged but this would be subject to resource considerations by FDC.</p>	<p>No changes</p>

	<p>identified in 7.3.2 have now been updated which may alter the conclusions drawn in the WCS. Similarly, Chapter 7.4 of the WCS suggests items that should be considered in a further "2b" Detailed Study but, again, we are not aware that such a Study has been carried out.</p>		
<p>COM-11 Elizabeth Mugova Environment Agency</p>	<p>Flood Risk Management Provision It is important that the IDP recognises the importance and future requirements for flood risk management infrastructure. With new funding rules, it is expected that contributions to schemes will be necessary. The IDP should make reference to the Anglian River Basin Flood Risk Management Plan (FRMP) which will replace the Catchment Flood Management Plan (CFMP) and the aspirations for future flood defence management. The FRMP is due to be published on 22 December 2015. There are also other infrastructure delivery aspects which should take account of flood risk. For example, opportunities to provide safe evacuation routes or detailed design help to ensure that new or improved infrastructure does not increase flood risk to third parties.</p>	<p>Noted</p>	<p>Changes made to text at 4.70 and 4.73</p>
<p>COM-12 Elizabeth Mugova Environment Agency</p>	<p>Road Network New road networks have the ability to contribute towards evacuation during floods. However, they must be designed so as to not direct flood flows.</p>	<p>Noted</p>	<p>Changes made to text at 4.73</p>
<p>COM-13 Elizabeth Mugova Environment Agency</p>	<p>Utilities Infrastructure Developers and all the relevant partners must ensure that utilities infrastructure is resilient against flood risk and is developed in lower flood risk areas or suitably mitigate against flood risk e.g.</p>	<p>Noted – the location of new development will be guided by consideration of the Sequential and Exception Tests where necessary as set out in Policy LP14.</p>	<p>Additional text added at 4.39</p>

	essential infrastructure should be raised above the 0.1% plus cc over its lifetime.		
COM-14 Elizabeth Mugova Environment Agency	Social and community infrastructure When planning for social and community infrastructure, developers must ensure that the development of more vulnerable infrastructure is directed away from flood risk areas or can mitigate against flood depths. Paragraph 4.63 should read 1 in 200 (0.5%) chance in a year.	Noted – the location of new development will be guided by consideration of the Sequential and Exception Tests where necessary as set out in Policy LP14.	Text added at 4.71
COM-15 Elizabeth Mugova Environment Agency	Consenting Please note under the terms of the Water Resources Act 1991, prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 9 metres of the top of the bank/foreshore of any watercourse, designated a 'main river' or tidal/sea defence.	Noted, this matter is also considered in the emerging Cambridgeshire –wide Flood and Water Supplementary Planning Document (SPD) – due summer 2016	Additional text added at 4.74
COM-16 Stewart Patience Anglian Water Services Ltd	The IDP Update outlines a range of funding sources for new and improved infrastructure. However this section does not include reference to Anglian Water's Business Planning process or the provisions of the Water Industry Act 1991. It is important to note that water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan. Foul network improvements (on-site and off-site) are generally funded/part funded through developer contribution via the relevant sections of	Noted	Additional text added at 4.48

	<p>the Water Industry Act 1991. The cost and extent of the required network improvement are investigated and determined when we are approached by a developer and an appraisal is carried out. There are a number of payment options available to developers. Options include deducting the revenue that will be raised from the newly connected dwellings (through the household wastewater charges) over a period of twelve years off the capital cost of the network upgrades. The developer then pays the outstanding sum directly to Anglian Water.</p>		
<p>COM-17 Stewart Patience Anglian Water Services Ltd</p>	<p>The schemes identified in the IDP Schedule were previously identified in the Council's water cycle studies which are used to inform the preparation of Anglian Water's Business Plan which is prepared once every 5 years and is approved by our regulator OFWAT.</p> <p>Any planned upgrades to water recycling centres would need to be identified in Anglian Water's Business Plan which is prepared every 5 years and approved by OFWAT.</p> <p>As set out above developers can also fund improvements to the foul sewerage network to serve specific development(s) in accordance with the requirements of the Water Industry Act 1991.</p>	Noted	Additional text added at 4.48
<p>COM-18 Graham Moore Middle Level Commissioners</p>	<p>It should be noted that many of the projects identified within the IDP may require the prior written consent of the Commissioners or administered Boards together with the appropriate contribution fee and this may need to be</p>	Noted	No change

	considered when preparing detailed schemes.		
COM-19 Graham Moore Middle Level Commissioners	The Middle Level Commissioners and administered Boards promote meaningful pre-application discussion as this enables any issues concerning flood risk/water level management, navigation and/or environmental issues to be dealt with at the earliest possible stage. The early consideration and resolution of flood risk management issues will also mean that fewer conditions relating to such issues would need to be imposed on planning permissions and that, where such conditions are imposed they can be more quickly discharged. This will lead to a substantial saving of time and costs for planning applicants, offers us, your authority and the applicant more certainty and can ensure that our respective limited resources are maximised and not wasted.	Noted	No change
COM-20 Graham Moore Middle Level Commissioners	Utilities – Water Supply The contents of item 4.34 are noted but we reiterate that water resources for other uses i.e. water abstraction to irrigate crops, maintain navigation levels, prevent deterioration of water quality and waterborne biodiversity will also need to be considered particularly if climate change becomes reality	Noted	Additional text added at 4.36
COM-21 Graham Moore Middle Level Commissioners	Utilities – Waste Water The contents of the beginning of item 4.41 do not solely refer to Whittlesey WRC but equally apply to any direct discharge into our systems. We are not aware of any discussion with AWS concerning the discharge from Whittlesey WRC. As discussed above it should not be assumed that consent will be given.	Noted	Text amended at 4.44

<p>COM-22 Graham Moore Middle Level Commissioners</p>	<p>Flood Risk Management Provision The contents of item 4.64 are noted but this is only one of many schemes that are undertaken by the Commissioners, IDBs and other RMAs to protect current and facilitate new appropriate development and growth within your Council's district and beyond.</p>	<p>Noted</p>	<p>Additional text added at 4.67</p>
<p>COM-23 Graham Moore Middle Level Commissioners</p>	<p>Infrastructure Schedule CHAT 4.3 and 4.4 - We note the content and have previously advised Chatters Town Council on this issue.</p> <p>Fenton Lode, to the west of the Superstore site, is the nearest sizable waterway to the town. However, this watercourse is not a Commissioners' watercourse and is not navigable as it is not deep enough to accommodate water borne vessels.</p> <p>To enable this would require the provision of a lock at the junction with the Commissioners' Forty Foot River, at considerable expense, and raising the water level in the Lode would significantly increase flood risk in the area particularly within western Chatteris and the 30sq km catchment that it serves unless suitable mitigation works were undertaken.</p> <p>The nearest navigable watercourse is the Forty Foot River at Dock Bridge. This is some 1.1km (0.68 miles) from the roundabout and the provision of moorings, seating, picnic areas etc is considered unlikely to increase visitors, create interest or encourage use unless it formed part of a larger amenity such as a Country Park and/or offline</p>	<p>Noted. It is accepted that the type and location of any facilities would require further detailed consideration.</p>	<p>No changes</p>

	Marina.		
COM-24 Graham Moore Middle Level Commissioners	CHAT 4.5 - Given the subject of this scheme it is assumed that the reference to the Middle Level Commissioners is an error.	Accepted.	Text amended
COM-25 Graham Moore Middle Level Commissioners	MAR 5.3 - The provision of a foot path such as that described would not be consented along this or any other riverside frontage	Accepted that the agreement of MLC or other relevant riparian owner would be required depending on the details of any scheme.	No changes
COM-26 Graham Moore Middle Level Commissioners	MAR 5.35, 5.48, 5.58 and 5.81 – These schemes potentially refer to the erection of four new bridges over the Old River Nene. However, in order to protect the existing river corridor, reduce further urbanisation and thus meet the requirements of the WFD, which promotes naturalisation of watercourses, it is considered that in addition to a new bridge for an eastern bypass only one additional bridge is likely to be recommended for consent.	Accepted that the agreement of MLC would be required depending on the details of any scheme which are likely to provide significant sustainability benefits to March, and would be subject to further detailed discussions.	No changes
COM-27 Graham Moore Middle Level Commissioners	MAR 9.1 – Since the publication of the Detailed March SWMP, the Commissioners and relevant administered Boards have promoted the potential for the suggested and encouraged improvement works to be undertaken by and/or funded by Developers but this has not occurred.	Noted. The support and encouragement for the March SWMP is welcomed and the document remains a valid consideration when assessing surface water flooding issues in March	No changes
COM-28 Graham Moore Middle Level Commissioners	It is interesting to note that within this County Council produced document two potential flood alleviation schemes were shown at Calvary County and Maple Grove Primary Schools but recent extensions or re-development by the same Council at these two locations has ignored these suggestions! In addition, the former may be being forced to discharge uphill!	Noted.	No changes

COM-29 Graham Moore Middle Level Commissioners	WISB 8.10 - Despite several requests to relevant stakeholders including your Council and Stephen Barclay MP, the Hundred of Wisbech IDB still await a formal approach on this project and the larger Masterplan being prepared for the area.	Noted. The relevant IDB and/or the MLC are to be invited to future meetings of the development of a master plan for the South Wisbech area.	No changes
COM-30 Graham Moore Middle Level Commissioners	Utilities and Flood Risk Not included within the list, but of interest to your Council, the Hundred of Wisbech IDB have, following discussion with the Highway Agency, authorised the Commissioners to progress the Project Appraisal Report (PAR) for inclusion in the Environment Agency's Flood Defence Grant-in-Aid (FDGiA) expenditure scheme to serve the South Wisbech Broad location for growth allocation.	Noted	Added as WIS9.7
COM-31 Graham Moore Middle Level Commissioners	In addition, March Third DDC is working in partnership with a developer to amend, uprate and improve its water level/flood risk management system in the Gaul Road area. The scheme will not only serve the development but will also alleviate flood risk both in Gaul Road and the area served by it to facilitate further growth in this sub-catchment. It will be funded entirely by the developer and is subject to the development receiving planning permission.	Noted	Added as MAR9.7
COM-32 Philip Raiswell Sport England	Sport England supports the inclusion of both indoor and outdoor community sports facilities as types of infrastructure to be included within this plan. We would wish to draw attention to the work currently being carried out on behalf of Fenland District Council, to produce a Playing Pitch Strategy (PPS) and Built Facilities Strategy (BFS). These documents will assess current provision of, and	Noted. Drafts of the documents are in the final stages of preparation and will be reported to Fenland's Cabinet in due course.	Changes made to text to highlight emerging sports infrastructure requirements at 4.97

	<p>future needs for, outdoor sports facilities such as playing fields, artificial grass pitches, tennis courts, Multi Use Games Areas etc. (PPS), and indoor community sports facilities such as swimming pools, sports halls, health and fitness facilities, indoor tennis etc. (BFS).</p> <p>Draft reports are due by the end of December 2015, with finalised documents due by end of March 2016. These documents will provide robust assessments of need in line with NPPF requirements and should therefore be used to identify infrastructure requirements for sport within this updated Infrastructure Delivery Plan (IDP).</p>		
COM-33 Jacquie Richardson Benwick Parish Council	No comments	Noted	No changes
COM-34 Joanna Melton – Clerk Chatteris Town Council	The Town Council has studied and noted the summary of requirements for Chatteris in the IDP. The only comment made was disappointment that there was no mention of a bus link from Chatteris to Manea Railway Station.	Noted	CHAT6.9 added to Schedule
COM-35 Mrs Yvonne Reader Parson Drove Parish Council	Physical Infrastructure – Highways and Transport Page 13 Public Transport 4.28 There is no mention of village bus services and your support for the suggested Interchange at Guyhirn. No reference has been made to investment in waterways transport such as the proposed Fenland Waterways Link which would join up waterways in Cambridgeshire and Lincolnshire.	Noted	Additional text added at 4.30 IDP schedule amended at GUY1.4, PD1.11, MUR1.7, and CE1.11
COM-36	Waste Water - Page 16 4.43	Noted	Text amended at 4.44

Mrs Yvonne Reader Parson Drove Parish Council	This section should also include North Level Internal Drainage Board as Middle Level Commissioners area of responsibility does not cover the whole of the Fenland District.		
COM-37 Mrs Yvonne Reader Parson Drove Parish Council	Flood Risk Management Provision - Page 19 4.64 SUDS could be put in place by developers who subsequently cease to trade therefore these should be managed by Public Bodies from the outset.	Noted. Emerging policy and guidance on how SuDS should be managed in the future is being produced as part of the emerging County-wide Flood and Water SPD – due summer 2016	No changes
COM-38 Mrs Yvonne Reader Parson Drove Parish Council	Community Facilities - Page 23 4.84 There should be much more detail on how growth in rural locations will be supported in addition to the expansion of the mobile library service.	Noted	Additional text added at 4.99
COM-39 Mrs Yvonne Reader Parson Drove Parish Council	Open Space and Green Infrastructure -Page 24 4.90 We support this but more could be done in the rural areas to provide woodland and assistance with maintenance of existing rural open spaces and village greens. Page 24 4.93 - There is no mention of the 30 plus acres at Whittlesey near the new Sainsbury Store.	Noted. Provision of open space will be considered on a case by case in the assessment of planning applications and whether a contribution is required or otherwise. Where provision of open space is required the extent and type will be considered at that stage. The proposed Sainsbury's store and Country Park are no longer going ahead and therefore this is not included in the IDP Schedule.	No changes
COM-40 Mrs Yvonne Reader Parson Drove Parish Council	Potential Funding and Delivery Options Page 25 5.3 - This should be reviewed in two years' time not three as stated. Page 28 5.22 - Again should state that CIL will not be available for the next two years.	Noted.	Text amended at 5.2 and 5.3
COM-41 Mrs Yvonne Reader Parson Drove Parish	Church End - Page 75 Church End and Parson Drove should both be under one heading and all the comments for	Noted.	Schedule amended to highlight facilities for Church End and Parson Drove are the same

Council	Parson Drove replicated under Church End.		
COM-42 Mrs Yvonne Reader Parson Drove Parish Council	Parson Drove Page 79 PD1.2 Improvements to the Swan Bridge junction should be deemed urgent in the Status & Comments section given that we have been pressing for this for over 5 years in view of the number of accidents. Please also add the following:- The protection of businesses, shops and public houses. The enhancement of all sport and leisure facilities. The reduction of the speed limit to 20mph outside the Alderman Payne Primary School	Noted. Whilst the IDP Schedule has been amended to reflect the other change, the protection of businesses, shops and public houses would be a matter to be addressed by Local Plan policies rather than through the IDP	Schedule amended at PD1.2, CE1.2, CE1.9, PD1.9, CE1.10 and PD1.10
COM-43 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward	Highways & Transport section - No reference has been made to investment in waterways transport such as the proposed Fenland Waterways Link, which would join up waterways in Cambridgeshire & Lincolnshire. This should be included within the document.	Noted	Additional text added at 4.30 and CE1.11 and PD1.11
COM-44 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward	Section 4.43 - Should this reference North Level IDB? The Middle Level Commissioners area of responsibility does not cover the whole of the District.	Noted	Additional text added at 4.44
COM-45 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward	Section 4.64 - The policy should be amended so that SUDs are managed by Public Bodies such as Middle Level Commissioners or IDB's. This would provide public accountability and transparency. It would also avoid any issues where private companies responsible for SUD's cease to exist.	Noted. Emerging policy and guidance on how SuDS should be managed in the future is being produced as part of the emerging County-wide Flood and Water SPD – due summer 2016	No changes
COM-46 Cllr Gavin Booth Parson Drove and	Section 4.84 - This section is not acceptable and needs a complete rewrite to give examples of all types of infrastructure to be provided for rural	Noted	Additional text added at 4.99

Wisbech St Mary Ward	communities, such as village halls, reduced speed limits in village locations, improved leisure facilities, etc. This issue was highlighted when the Planning Inspector reviewed the Local Plan before adoption and a direction was given that this should be updated, given the lack of detail.		
COM-47 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward	Section 4.90 - This section should include community woodlands to be provided in rural areas.	Noted.	Additional text added at 4.106
COM-48 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward	Section 5.3 & 5.22 - As a further year has progressed the CIL should be reviewed in two years and not three.	Noted.	Additional text added at 5.3 to clarify review times
COM-49 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward	Section 5.4 - Should reference the use of Section 106 to provide funding.	Noted, but this is already stated in the IDP at para 5.3	No changes
COM-50 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward	General Observation - The policy should also include the ability to use funding to protect existing shops and pubs within the rural villages.	Where infrastructure is required to support these services then they would be relevant but the support of village services is addressed more broadly through the Local Plan policies	No changes
COM-51 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward	Church End - should replicate the infrastructure of Parson Drove as it forms part of the same Parish	Noted	Schedule amended to replicate infrastructure for both Parson Drove and Church End
COM-52	Murrow -	Noted	Schedule amended to reflect

<p>Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward</p>	<p>Include footpath & Road safety measures for Back Road. Include 30 mph speed limit for whole length of Murrow Bank through Village. Improved Street Lighting in village. Public Transport interchange at Guyhirn will benefit the village. Road Safety measures in the village. More bins and postboxes within the village. Improvement and clearance of existing drainage ditches.</p>		<p>identified need at MUR1.5 to MUR1.9 inclusive</p>
<p>COM-53 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward</p>	<p>Parson Drove & Church End - Include Road safety measures and 30 mph speed limit for whole of Main Road. Include 20 mph speed zone outside of primary school. Improved Leisure and fitness facilities on the playing field such as an external gym. Public Transport interchange at Guyhirn will benefit the village. Include 30 mph speed limit along length of Murrow Bank / The Bank. Road Safety measures in the village. More bins and postboxes within the village. Improvement and clearance of existing drainage ditches.</p>	<p>Noted</p>	<p>Schedule amended to reflect identified need at PD1.9 to PD1.14 and CE1.1 to CE1.14 inclusive</p>
<p>COM-54 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward</p>	<p>Guyhirn - Include Road safety measures and 30 mph speed limit for whole of Gull Road, given the development now agreed for this area. Public Transport interchange should be a priority. Road Safety measures in the village. More bins and postboxes within the village.</p>	<p>Noted</p>	<p>Schedule amended to reflect identified need at GUY1.3 to GUY1.7 inclusive</p>

	Improvement and clearance of existing drainage ditches.		
COM-55 Cllr Gavin Booth Parson Drove and Wisbech St Mary Ward	Wisbech St Mary - Include Road safety measures and 30 mph speed limit for whole of High Road. Road Safety measures in the village. More bins and postboxes within the village. Improvement and clearance of existing drainage ditches. More lay equipment for young adults including a skate ramp.	Noted	Schedule amended to reflect identified need at WSM1.3 to WSM1.7 inclusive
COM-56 Cllr Steve Count March North Ward	Paragraphs 4.48 to 4.52 The strategy has limited itself to supply only. Constraints in many areas, probably including Fenland, regarding putting electricity into the grid are evident, with no forward planning to improve the situation. Government legislation only describes supply, however not dealing with input constraints means that energy generation plans, such as solar, are often thwarted at the first hurdle. Should we not introduce something into our concept of what is required, in order to start influencing planning.	The IDP limits itself to the infrastructure required to deliver the electricity supply generated by a variety of means. However, Local Plan policies are supportive of a range of renewable energy generation types which will contribute to the provision of new supply with each proposal to be determined on its merits. If a lack of infrastructure needed to deliver the supply is highlighted this would be included in the Schedule.	No changes
COM-57 Cllr Steve Count March North Ward	Broadband 4.54 to 4.58 This is insufficient in terms of communication. Our residents are also entitled to expect us to do something about mobile reception and mobile internet. We need to eliminate any not spots asap and enhance our coverage so that 4G is the norm throughout the area.	Noted.	Additional text added at 4.65
COM-58 Cllr Steve Count March North Ward	Paragraph 4.88. Please re check your Ofsted rating claim for COWA. Although I believe COWA is outstanding I believe their inspection 2013 rated it	Noted. COWA most recently rated as 'Good'	Text amended at 4.90

	as good.		
COM-59 Cllr Steve Count March North Ward	Paragraph 4.78 Suggest alteration: "In previous years the COWA buildings on the Isle Campus in Wisbech have been recognised to be in a poor condition."	Noted	Text amended at 4.91
COM-60 Cllr Steve Count March North Ward	Paragraph 4.83 Why do Wisbech and March require additional community libraries?	Cambs CC has confirmed that additional library facilities rather than new libraries are required due to demographic pressures.	Text and Schedule has been amended at 4.96 and MAR1.1 and WIS 1.1
COM-61 Cllr Steve Count March North Ward	Paragraph 4.83 If March and Whittlesey require additional sports courts and they can be delivered through existing facilities, why aren't they!!	An emerging study for sports facilities in Fenland is under consideration.	Text amended at 4.97
COM-62 Cllr Steve Count March North Ward	Paragraphs 4.92 and 4.93 Would like more detail to highlight the extent of the shortage of open green space which has been glossed over.	Noted	Text amended at 4.106
COM-63 Cllr Steve Count March North Ward	Section 5 covers potential funding and delivery options, yet does not mention emerging neighbourhood strategies. These may well affect funding but may also deliver some local infrastructure. Section 5 also fails to mention potential bids to various UK Government pots and directly to Europe.	Noted	Text amended at 5.2
COM-64 Cllr Steve Count March North Ward	Paragraph 5.3 The review of CIL was three years' time from when it went to council. It will not be three years when this is adopted so I would prefer a date November 2017 in this document.	Noted	Text amended to late 2017 / early 2018 at 5.3
COM-65 Cllr Steve Count March North Ward	Under open space and recreation for March. Estover which is now under local control should play into thoughts. Especially as buildings are suggested on the next door site.	Noted.	Text amended at 4.107
COM-66 Cllr Steve Count March North Ward	Despite this comment in the document; "MAR5.4 Footpath on northern side of Estover Road Improve pedestrian convenience & safety March MTTs (W2)	Noted, details of the planning proposals on adjacent land to the playing fields are still under consideration	No changes

	LP15 £30,000 Developer/CCC/Others Cambs Highways. This has not been introduced yet as a condition on the delivery of the housing at St. Johns Land adjacent to Estover. Hopefully FDC are not too late!!		
COM-67 Stephen Hodson Hodsons Chartered Surveyors	Whittlesey By Pass(WBP) Suggest the WBP is included in the next 5 year Local Transport Plan. Funding is probably available from the EU and the local LEP. In fact ,if the Wisbech to March Railway line is cancelled the funding for the WBP would be there.	The WBP is already included in the IDP at WHIT8.1 and delivery will be dependent on funding availability	No changes
COM-68 Stephen Hodson Hodsons Chartered Surveyors	Education 1000 houses are approved to be built in Whittlesey within the next 5 years.A new primary School is required. It could be built next to Aldermans Jacobs school on part of Sir Harry Smith’s site.	Cambs CC have acknowledged the need for new primary school places in Whittlesey	Text and Schedule amended at 4.86 and WHIT2.1
COM-69 John Maxey Maxey Grounds & Co	Most of the text dealing with evidence base in general terms appropriately identifies headings for infrastructure, but in general terms and not specifics that are essential for either each settlement or specific sites. The document also identifies various funding options but again not in sufficient detail to add meaningfully to the discussion. It is left to the development schedule to suggest for each settlement / area the infrastructure that is necessary. Concerned that this part of the document lacks significant detail – too many items that are identified as essential infrastructure are uncostered.	Noted. The purpose of the IDP is to identify the critical infrastructure necessary to deliver the Local Plan in order that these issues can be considered at the earliest opportunity, as well as other items which will help deliver growth in general. Changes in responsibilities or strategies of delivering partners and providers as well as the formulation of master plans may well mean that some elements are not required. Conversely other elements may emerge that are not currently included. As the IDP explains the list is not exhaustive and does not include all elements required for the urban extension areas and will be	No changes

	<p>There are many features that are not essential for development to be delivered – as a single example WIS 3.1 talks about land provision for expansion or new provision of GP’s facilities whereas NHS at the recent Wisbech East meetings have indicated that there is no such intention. Funding for such facilities is noted as Developers / others whereas GP surgeries are private businesses that are self funding and so no Developer contribution is appropriate. There are other similar examples covering other types of infrastructure, such as those areas providing added convenience – convenience and necessity are not the same and to be suitable for s106 agreements works have to be those without which the development would be unacceptable . An example of this is WIS6.6 – improving bus stops to enhance journey experience.</p> <p>Certain works appear illogical – In an era of SUDS where new development will be restricted to Greenfield run of rates, what is the justification for WIS9.1 a new pumping station to serve West Wisbech, where no great a volume of water will need pumping because of SUDS.</p> <p>These are a small sample of examples of unnecessary, or inappropriate requirements being listed, or inappropriate funding suggested which are likely to give grounds for inclusion in S106 requests of works that are unnecessary.</p> <p>There appears to have been insufficient work done</p>	<p>subject to change, although it attempts to provide as clear steer as possible as to what infrastructure requirements are likely to be.</p> <p>The IDP explains that funding for projects will come from a variety of sources. S106 contributions could only be achieved if they meet the three key tests set out in Regulation 122 of the CIL Regulations 2010 (as amended) namely:- 1) to make development acceptable, 2) be directly related to the development, and 3) be fairly and reasonably related in scale and kind to the development.</p> <p>As set out in the Fenland Local Plan it is important that infrastructure is provided to enable sustainable growth and to make developments acceptable in planning terms for future residents.</p> <p>Viability will be an issue in the consideration of all planning applications where S106 contributions are required.</p>	
--	---	---	--

	<p>in assembling the document in requiring the nominating body to justify why the item is essential and why it warrants developer funding in many cases.</p> <p>I would suggest that far from being a plan for delivery this document represents a s106 shopping list, and as such is not fit for purpose.</p> <p>For FDC area where viability is stretched the inclusion of unnecessary requests for infrastructure will act as a barrier to development and delivery of the adopted housing supply rates. They are more likely to frighten potential developers away from sites than aid delivery.</p>		
COM-70 Sarah Randall Renewable Energy Systems Limited	RES are disappointed that the Fenland Infrastructure Delivery Plan does not consider renewable energy despite discussing gas and electricity. This is not consistent with the requirements of the NPPF and the WMS (Written Ministerial Statement of 18 th June 2015) providing a positive and proactive approach regarding renewable development.	Noted. Electricity is produced from a variety of sources including renewable energy sources such as wind turbines. The purpose of the IDP is to identify whether the infrastructure delivering the supply generated is sufficient to enable the required growth. Policy LP14 (Part A) of the Local Plan provides positive support to renewable energy schemes in the context of sustainable development and climate change. In deciding on planning proposals FDC would have regard to the Local Plan as well as any other material considerations including the WMS of 18 th June 2015.	No changes
COM-71	Although we are not currently promoting any	Noted	No changes

<p>Sarah Randall Renewable Energy Systems Limited</p>	<p>specific sites within the Fenland District, we believe that there is significant potential to work with your council and to take a partnership approach to identifying suitable sites for onshore renewable energy projects. We also believe that there is significant support RES could provide to your planning team, given our expertise of onshore wind site selection. RES is happy to provide support to the Council and provide data to inform the identification of suitable areas for wind energy development.</p>		
<p>COM-72 Sarah Randall Renewable Energy Systems Limited</p>	<p>The Local Plan and Fenland Infrastructure Delivery Plan document does not identify any areas suitable for onshore wind. The omission of potential onshore wind areas from the Local Plan will have the effect of imposing a moratorium against all wind energy development in the district of Fenland. This approach is not a proactive or positive strategy to promote energy generation from renewable sources; nor will it provide an effective strategy to maximise renewable energy development in Fenland. RES considers that the Fenland Infrastructure Delivery Plan is neither positively prepared nor effective through the omission of renewable energy, and therefore is not sound. The development of the Fenland Infrastructure Delivery Plan provides the opportunity to address the requirements of the WMS and NPPF by provision of a map of suitable onshore wind areas and transposing the Infrastructure Delivery Plan into a Development Plan Document, or by providing a statement giving a timeframe for production of a Development Plan Document on renewable</p>	<p>The Fenland Local Plan takes a criteria based approach to planning proposals and other than urban extensions does not allocate any land uses. Policy LP14 (Part A) of the Local Plan provides positive support to renewable energy schemes in the context of sustainable development and climate change. In deciding on planning proposals FDC would have regard to the Local Plan as well as any other material considerations including the WMS of 18th June 2015. In addition it would not be legally possible to allocate land through the IDP.</p>	<p>No changes</p>

	energy and a map identifying areas suitable for onshore wind.		
COM-73 Sarah Randall Renewable Energy Systems Limited	A map is attached of areas suitable for onshore wind and we would be happy to discuss this in more detail and to support the Council to develop a map for a Development Plan Document. To create this map we have used wind data and taken into account housing buffers and other constraints.. RES recommend that existing onshore wind sites should also be included in the map identifying areas suitable for onshore wind to enable any required repowering.	Noted. Through its pre-application protocol FDC is always willing to discuss development proposals, but currently has no plans to produce a Development Plan Document relating to onshore wind turbines.	No change
COM-74 Nolan Tucker WYG on behalf of Church Commissioners	<p>Consider that the list of critical requirements is extensive and we question the need for all of these items of infrastructure which do not appear to be supported by robust evidence. One such example is that the schedule includes three new primary schools and one new secondary school, along with additional school places, and expansion for a school, in Wisbech.</p> <p>All of these education requirements are considered to be 'critical' in the Infrastructure Schedule, which are essential for the delivery of the urban extensions. There is also no reference to the timescales for when the infrastructure is required. The housing target for Wisbech is 3,000 dwellings + 550 dwellings in the Kings Lynn and West Norfolk Borough Council area over the Plan period (as set out in policy LP4 housing in the Fenland Local Plan). The education requirements do not appear proportionate to the scale of development proposed for Wisbech.</p>	Noted. The purpose of the IDP is to identify the critical infrastructure necessary to deliver the Local Plan in order that these issues can be considered at the earliest opportunity, as well as other items which will help deliver growth in general. Cambs CC has provided updated information with regard to new education facilities in Wisbech and these are included in the IDP Schedule.	Schedule amended at WIS2.1, WIS2.3 and WIS2.5

<p>COM-75 Nolan Tucker WYG on behalf of Church Commissioners</p>	<p>Question the inclusion of a long list of transport schemes in advance of the completion of the Wisbech Access Study (which is due by mid-2016).</p>	<p>Many of the transport projects in the IDP come from approved Market Town Transport Strategies. New evidence may emerge which requires additional infrastructure such as through the Wisbech Access Study, or recognises that infrastructure highlighted in previous studies is no longer required.</p>	<p>No changes</p>
<p>COM-76 Nolan Tucker WYG on behalf of Church Commissioners</p>	<p>Have concerns about the lack of clarity within the Fenland IDP Draft Update regarding how the infrastructure will be funded. Paragraph 5.3 of the Fenland IDP Draft Update states that “the Council is not proposing to introduce a Community Infrastructure Levy (CIL) for the time being due to viability constraints although the situation will be reviewed in three years’ time. Instead there will be a reliance on S106 contributions to make a part or total contribution to infrastructure provision.”</p> <p>The independent report into the potential for introducing CIL by DSP Housing and Development Consultants (September 2014) identified that viability is finely balanced for the main locations for residential development in Fenland (including Wisbech) and that once development costs are factored in the outcomes do not provide sufficient headroom to support CIL charging. The recognition that there are viability constraints in the Fenland district is not reflected in the infrastructure schedule which provides a wide range of infrastructure requirements, many of which are defined, by Fenland District Council, to be ‘critical’ to the delivery of the key policies in the Local Plan</p>	<p>Noted. Funding of infrastructure is likely to come through a variety of sources of which S106 will be a part. FDC is aware of viability issues in Fenland and will have this in mind in the production with partners of Broad Concept Plans for urban extensions and in the consideration of planning applications.</p>	<p>No changes</p>

	and are elements of key infrastructure that are essential for the delivery of the urban extensions. We are therefore concerned that the scale of infrastructure set out in the IDP will not realistically be able to be delivered through the available funding sources.		
COM-77 Nolan Tucker WYG on behalf of Church Commissioners	The CIL Regulations impose a limit on pooled contributions from planning obligations towards infrastructure that may be funded by the levy. No more may be collected in respect of a specific infrastructure project or a type of infrastructure through a section 106 Agreement if five or more obligations for that project or type of infrastructure have already been entered into since 6 April 2010. The pooling restrictions apply to types of infrastructure that are capable of being funded by the levy such as those items in the Infrastructure Delivery Schedule. Therefore it would only be a limited number of schemes that could contribute funding through a section 106 Agreement for the infrastructure items set out in the IDP.	Noted. It is agreed that the new S106 pooling restrictions mean that the funding of specific infrastructure projects will require careful consideration.	No changes
COM-78 Nolan Tucker WYG on behalf of Church Commissioners	It is important to reiterate that there is also clear national guidance on the circumstances in which planning obligations can be sought by the local planning authority. The Planning Practice Guidance states <i>“the local planning authority must ensure that the obligation meets the relevant tests for planning obligations in that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. Planning obligations should not be sought where they are clearly not necessary to make the</i>	Noted. For the urban extensions details of the provision and phasing of infrastructure will be provided through the production of Broad Concept Plans. Viability will be a key factor in what is finally agreed in each case.	No changes

	<p><i>development acceptable in planning terms. Planning obligations must be fully justified and evidenced."</i></p> <p>The Fenland IDP Draft Update does not provide detail on the timing of when infrastructure is required and we consider that some clarity is provided in respect of timescales. It is necessary that a balanced and pragmatic approach is taken to reflect development viability and ensure that the housing and employment needs identified in the Local Plan are delivered. Strategic sites such as the identified 'Broad Locations for Growths' are critical to the delivery of the Local Plan, and Fenland District Council should ensure that the combined total impact of requests for financial contributions towards infrastructure does not threaten the viability of the sites and scale of development identified in the Local Plan.</p>		
<p>COM-79 Mark Vawser Vawser & Co</p>	<p>Comments are confined to FDC's aspiration for future housing growth.</p> <p>Provision of new housing within the Market towns is linked to huge infrastructure costs which are likely to be unaffordable.</p> <p>Given that the average house prices in Fenland are relatively low when compared to other regions anticipate that the Council's expectation of new housing growth will not be achieved due to market forces. This is because the proposed infrastructure costs are likely to exceed the average selling price of each new dwelling. Would suggest that existing and future funding of developments in Fenland must be supported by external funding of a considerable magnitude.</p>	<p>Noted. FDC is aware of viability issues in Fenland and will have this in mind in the production with partners of Broad Concept Plans for urban extensions in the market towns and in the consideration of planning applications. External funding e.g. through the LEP may well contribute to the provision of key infrastructure elements.</p>	<p>No changes</p>
