

## Question 27: Any Other Comments

50103

### Consultee

Title

First Name Melanie

Surname Atwell

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50103-61 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

No

50039

### Consultee

Title

First Name Hilary

Surname Bailey

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50039-48 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Note the NPPF para 97. "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements

Note that in a recent consultation "access to more parks and green spaces" was highlighted as the biggest priority for local residents." [https://www.fenland.gov.uk/.../Chatteris\\_Interim\\_Report...](https://www.fenland.gov.uk/.../Chatteris_Interim_Report...)

See separate application for Wenny Road Meadow to be adopted as Local Green Space.

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50007

### Consultee

Title

First Name Serena

Surname Bailey

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50007-66 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

I really want to strongly advocate that the inclusion of Wenny Meadow in Chatteris as an area to be built on be reconsidered. The community heartily value this space, in a town already considered deficient on open green space. If this space is lost community member such as dog-walkers will be forced to cross over the by-pass in order to access open green space, which is highly dangerous (especially in Winter when it is dark and visibility is reduced). For its historical, natural and community value the meadow should be protected.

50046

### Consultee

Title

First Name Bryan

Surname Baker

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50046-67 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

It's been noted that new developments run rough shod over local people's objections. One should take into account local knowledge.

50081

### Consultee

Title Mr

First Name Martin

Surname Baker

Position

Organisation Wildlife Trust for Bedfordshire, Cambr

### Agent

Title

Name

Surname

Position

Organisation

50081-23 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

The Wildlife Trust welcomes the much greater emphasis placed on the environment strand of sustainable development compared to previous versions of Fenland's local plans. We hope that this translates into strong policies and sustainable locations for new development that follow the mitigation hierarchy, of avoid, minimise, mitigate, compensate.

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## Question 27: Any Other Comments

50041

Consultee		Agent	
Title		Title	
First Name	Lucy	Name	
Surname	Bartley	Surname	
Position	Consultant Town Planner	Position	
Organisation	National Grid	Organisation	

50041-1 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

50059

Consultee		Agent	
Title	Mr	Title	
First Name	Mark	Name	
Surname	Behrendt	Surname	
Position	Planning Manager	Position	
Organisation	Home Builders Federation	Organisation	

50059-13 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Thank you for consulting the Home Builders Federation (HBF) on the issues and options consultation for the new local plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year. Outlined below (in our submitted representation) are our comments on the approach taken by the Council to increasing the supply of land for residential development and the policies being proposed with regard to the management of new development in future. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. The HBF would like to be kept informed of the progress of the document. Please use the contact details provided below for future correspondence.

50117

Consultee		Agent	
Title		Title	Mr
First Name	Sharon, Patricia Joyce and Melanie	Name	Richard
Surname	Bester, Whittlesey and Curl - C/O NYC	Surname	Mowat
Position		Position	
Organisation		Organisation	Johnson Mowat

50117-49 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Please see supporting vision document [attached] as the suitability of the representation site and its potential to deliver at least 75% affordable housing.

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50122

### Consultee

Title

First Name Robert

Surname Boddington

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50122-68 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

More biodiversity in all areas. The wildlife, more than anything else, is paramount to our future.

50029

### Consultee

Title

First Name Ted

Surname Brand

Position

Organisation Brand Associates Architects

### Agent

Title

Name

Surname

Position

Organisation

50029-43 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Flood risk

- EA Flood Zones 2/3 should not be the trigger for sequential test as the EA zones are not accurate measure of actual flood risk
- Large areas of farmland have had sites blighted by existing policy, for no good reason.
- The current requirement ST requirements are loaded against small sites as they are more available than large sites, this is not logical
- North and Middle level commissioners information should be the trigger for sequential testing
- The Fens are unique and must have policies to reflect this.

50090

### Consultee

Title

First Name Fiona

Surname Bryan

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50090-68 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Standardisation is boring. Flexibility is key to growth. Architectural sympathy should be applied to development of towns and villages.

## Question 27: Any Other Comments

50060

### Consultee

Title

First Name Nicole

Surname Burnett

Position Senior Planner

Organisation Gladman

### Agent

Title

Name

Surname

Position

Organisation

50060-21

### 27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

These representations are submitted by Gladman in response to the current consultation on the Fenland Local Plan 2019-2040 Issues and Options (FLP). Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to a decent home and employment opportunities.

Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in this representation.

Through this submission, Gladman have sought to provide our thoughts on a number of issues and options identified within the consultation document. Gladman submit that the Council will need to carefully consider some of its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (2019).

#### Context

The revised Framework (2019) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order for it to be sound it is fundamental that the Fareham Local Plan is:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.

#### NATIONAL PLANNING POLICY

##### National Planning Policy Framework

On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

The revised Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future

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generations. In particular, paragraph 16 of the Revised Framework (2019) states that Plans should:

- a) Be prepared with the objective of contributing to the achievement of sustainable development;
- b) Be prepared positively, in a way that is aspirational but deliverable;
- c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay .

In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method as set out in the PPG unless exceptional circumstances justify an alternative approach. It is imperative that the emerging Local Plan is formulated on the basis of meeting this requirement as a minimum.

Once the minimum number of homes that is required is identified, the planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing need. It states: "Strategic policy-making authorities should have a clear understanding of the land available in their areas through the preparation of a strategic housing land availability assessment. From this planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Strategic plans should identify a supply of:

- a) Specific, deliverable sites for years one to five of the plan , and
- b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

Once a local planning authority has identified its housing needs, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so . Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided, where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.

To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the revised Framework (2019).

### Planning Practice Guidance

The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans. In particular, the updated Housing Needs Assessment chapter of the PPG confirms that the revised Framework expects local planning authorities to follow the standard method for assessing local housing needs, and that the standard method identifies the minimum housing need figure and not a final housing requirement .

The calculation of objectively assessed needs (OAN) for housing has been a subject of much debate as part of Local Plan Examinations and s.78 appeals since its initial introduction through the Framework in 2012. To simplify the assessment the Government, through the revised Framework has introduced the standardised method which should be undertaken through the 3-stage process outlined at paragraph 005 of the PPG .

Notwithstanding the above, it is important to note that whilst the standard methodology to assessing housing needs has been introduced, it is likely that this will be subject to further change. In this regard, it is currently anticipated that the standard method will be adjusted to ensure that the starting point in the plan-making process is consistent with the Government's proposals in Planning for the Right Homes in the Right Places consultation, to ensure that 300,000 homes are built per annum by the mid-2020s. This follows the release of the 2016 based household projections in September 2018, which forecast a lower

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level of household growth than previously envisaged.

It is therefore important that future iterations of the Local Plan take account of any changes to the standard method for calculating housing needs during the course of their preparation.

Whilst the PPG advises that the standard method is not mandatory, there is a possibility that other methods can be used in exceptional circumstances based on robust evidence in order to deviate from the standard method. Indeed, the PPG is clear that the standard method only identifies the minimum number of homes required to meet population needs and does not take into account the variety of factors which may influence the housing required in local areas such as changing economic circumstances or other factors which may change demographic behaviour. Where additional growth above historic trends are likely to occur, then local planning authorities should include an appropriate uplift to the housing numbers to meet the need in full. It is important that this uplift is undertaken prior to and separate from the consideration of the demographic baseline assessment of need and how much of this need can be accommodated in a housing requirement figure. Circumstances where the need to apply an uplift may be appropriate include, but are not limited to:

- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. housing deals);
- Where strategic infrastructure improvements are planned that would support new homes;
- Where an authority has agreed to take on unmet need, calculated using the standard method from neighbouring authorities, as set out in a statement of common ground;
- Historic delivery levels where previous delivery has exceeded the minimum need identified it should be considered whether the level of delivery is indicative of greater housing need; and
- Where recent assessments such as Strategic Housing Market Assessments suggest higher levels of need than those proposed by a strategic policy making authority, an assessment of lower need should be justified.

In addition, it is important for local planning authorities to consider the implications of the standard method on delivering affordable housing need in full. The PPG is clear that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by open market housing development. If it becomes clear that affordable housing need will not be delivered in full, then an increase to the total housing figures included in the plan should be considered where it could help to deliver the required number of the affordable homes.

### LEGAL REQUIREMENTS

#### Duty to Cooperate

The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.

The revised Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The revised Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process. The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point and St Albans examinations, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.

#### Sustainability Appraisal

In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).

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The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision-making and scoring should be robust, justified and transparent. Gladman

welcome the opportunity to comment on the FLP Issues and Options document and hope these representations are found to be constructive. Gladman request to be added to the consultation database and updated on any future public consultations for the FLP.

For the FLP to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. This will require the Plan to be positively prepared, justified, effective and consistent with national planning policy.

In preparing the Plan, Gladman submit that the Council will need to carefully consider its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (2019).

50070

### Consultee

### Agent

Title

Title

First Name C

Name

Surname Burrell

Surname

Position

Position

Organisation

Organisation

50070-39

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Living in Tydd St Giles for the past 6 years I have seen a proliferation of large, detached properties built on infill land along the approach roads to the village. It appears that we have a target of new homes to be provided within the village and the suggestion is that this will be in the form of a single development. We already have issues with localised standing water and flooded gardens during rainy weather. A substantial new development will add to this issue. The sewage treatment provision within the village is a breaking point. A sewage pumping station is sited on my driveway and this regularly fails due to the number of additional properties feeding into this system. There is good, viable, productive arable land situated throughout the village. Under no circumstances should this be lost to housing development - the land is a carbon sink, allows for water absorption, and provides food (which will become increasingly important if Brexit occurs). Additional housing could be achieved by requiring all outstanding infill plots to provide a pair of semi-detached properties rather than a single dwelling, without the need to encroach on arable land. These properties would also be more likely to be affordable than large single detached dwellings.



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50083

### Consultee

Title

First Name Andrew

Surname Burrell

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50083-59 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Parish councils need to consult their residents before suggesting anywhere for development to FDC as highlighted at the recent meeting in Tydd St Giles, which FDC failed to turn up to and for the residents to find out decisions are being made without any thought or consultation.

50022

### Consultee

Title Mr

First Name Adrian

Surname Cannard

Position

Organisation Cambridgeshire & Peterborough Com

### Agent

Title

Name

Surname

Position

Organisation

50022-31 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

The ambition of the Combined Authority is to ensure new development is supported by the appropriate infrastructure when (or before) it needs it, not delivered afterwards. By being proactive in investment through the Devolution deal the Combined Authority is both tackling existing deficits in infrastructure and creating potential for growth. Even so, the expectation must still be that new development will contribute to the provision of strategic and local infrastructure.

The Combined Authority has, and will continue to, work in partnership with Fenland District Council in developing policies to make the Cambridgeshire and Peterborough area the leading place in the world to live, learn and work,

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50115

### Consultee

Title  
First Name  
Surname Clifton Homes Ltd  
Position  
Organisation

### Agent

Title Mr  
Name Matthew  
Surname Kendrick  
Position  
Organisation Grass Roots Planning

50115-14 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Duty to Co - Operate

2.9 Whilst we appreciate that the plan is in very early stages, the Issues and Options document makes no reference to the Duty to Co-Operate and the ongoing legal requirement to cooperate with statutory and non-statutory partners. Whilst some minor reference is given to working with Cambridgeshire County Council and the Combined Authority regarding community and transport infrastructure, there is little mention of housing need and whether any adjacent authorities will require FDC to accommodate any unmet housing requirements arising from them, within the District's boundaries.

2.10 Evidence needs to be provided to show what discussions have taken place, and agreements reached, during the course of the plan-making process. This will establish whether any future allocations of housing land are required.

50109

### Consultee

Title  
First Name Steve  
Surname Count  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50109-13 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

All new developments, paths roads should have ducting for fibre and Full fibre to the premises. Is a new district heating project viable. A positive policy to allow telecommunication masts to enable better connectivity. Could affordable and social housing descriptions prioritise local and certain types of employment first?

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50017

Consultee		Agent	
Title		Title	
First Name	Steve	Name	
Surname	Cox	Surname	
Position	Executive Director Place & Economy,	Position	
Organisation	Peterborough City Council	Organisation	

50017-3 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

This document covers all relevant issues and is well set out based around a series of questions. At this early stage of preparing the Fenland Local Plan Peterborough City Council is unaware of any strategic matters which might arise between the two areas. We would like to be informed of the progress of the Fenland Local Plan and welcome further discussion as the Plan progresses.

50124

Consultee		Agent	
Title		Title	
First Name	Charlotte	Name	
Surname	Dew	Surname	
Position		Position	
Organisation	Larkfleet Homes	Organisation	

50124-53 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Other comments regarding viability will be submitted via Maxey Grounds on behalf of Larkfleet Homes

50121

Consultee		Agent	
Title		Title	
First Name	Anne	Name	
Surname	Dew	Surname	
Position	Development Planning Manager - East	Position	
Organisation	Persimmon Homes	Organisation	

50121-51 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

No

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## Question 27: Any Other Comments

50010

### Consultee

Title

First Name Eamonn

Surname Dorling

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50010-68 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

We should be consistent in our climate change emergency actions. Re-cycling is less important than reducing and re-purposing but we need to educate Fenland residents to gain [tradion] a comprehensive network of EV charging points in every FDC car park and at each Council Office and depot for public use.

50018

### Consultee

Title Councillor

First Name James

Surname Downes

Position

Organisation Leverington Parish Council

### Agent

Title

Name

Surname

Position

Organisation

50018-68 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

This form is full of loaded and ambiguous questions.

50127

### Consultee

Title

First Name Valerie

Surname Emmons

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50127-51 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

It seems to me that most of the Fenland budget is allocated to Wisbech and March. Nothing seems to come to Chatteris, which is sinking into obscurity – it is rarely mentioned in any plan.

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50076

### Consultee

Title Mrs  
First Name D  
Surname Evans  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50076-29

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

This consultation is a positive step taken by Fenland district council. Being an elected body I would like to think that you will take all our opinions into account before the council decide our future for the next 20 years

50100

### Consultee

Title  
First Name Susanah  
Surname Farmer  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50100-67

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

This questionnaire is soooooooo long! I hope there will be personal contact with residents to get input. I have the luxury of internet connection and literacy.

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50052

### Consultee

Title Mr  
First Name Stephen  
Surname Faulkner  
Position  
Organisation Norfolk County Council

### Agent

Title  
Name  
Surname  
Position  
Organisation

50052-2

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

The County Council welcomes the opportunity to comment on the emerging local plan. In taking forward any allocations close to the Norfolk border the County Council would suggest the need for any crossboundary issues to be considered, particularly with regard to the provision and delivery of education and the potential impacts on the highway networks.

Due to the proximity of the proposed growth to the A47, the local plan must support the objectives of the A47 Alliance to enhance the A47. Growth should help advance this objective and not be detrimental to the strategic function of the A47 or frustrate long term improvements.

Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner at Norfolk CC) at [richard.doleman@norfolk.gov.uk](mailto:richard.doleman@norfolk.gov.uk) or call 01603 223263.

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## Question 27: Any Other Comments

50031

### Consultee

Title Mr  
First Name Colum  
Surname Fitzsimons  
Position  
Organisation Cambridgeshire County Council

### Agent

Title  
Name  
Surname  
Position  
Organisation

50031-19

### 27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Transport Assessment It is noted in the issues and options report that, “as part of the evidence base for the Local Plan, we will work with Cambridgeshire County Council to assess the impact of the Local Plan growth requirements on local roads to minimise any congestion”. This approach is welcomed and CCC and FDC officers are starting to have conversations around topic to get processes and work in place. The amount of time and funding this work may require should not be underestimated. Site Assessment Methodology (October 2019) We welcome the inclusion of Criterion 16 (species and habitats). However, this criteria should also consider impact to international and national (statutory designated) sites for nature conservation. We welcome the usage of the Cambridgeshire Habitat mapping (para 4.70), however there should be some caution / professional interpretation because the maps are based on habitat surveys conducted in the 1990s and therefore, will inherently have some errors. The Cambridgeshire and Peterborough Biodiversity Group is currently assessing the best way to update the dataset, including ground-truthing approximately 10% of the dataset and conducting condition assessments on County Wildlife Sites (CWS). We strongly recommend that ground-truthing of the Fenland area of the habitat map be undertaken and that all Fenland CWS be resurveyed to ensure that the draft Local Plan is underpinned by the most up-to-date evidence. We welcome the inclusion of Natural England Goose and Swan Functional Land Impact Risk Zone (para 4.70). It should be noted that this information forms part of Natural England’s SSSI Impact Risk Zone, which highlights risks areas for all SSSIs (supporting nationally important species / habitats), and therefore may be a better dataset to utilise. We suggest further discussions with Natural England and your Wildlife Officer on this matter. Consideration should also be given to the presence of priority habitats and species, along with Cambridgeshire and Peterborough Additional Species of Interest (available from Cambs & Peterborough Environmental Records Centre). The County Council note and support the proposal for engagement in the site assessment process, notably Criterion 2 (minerals and waste), Criterion 8 (local roads), Criterion 10 (public rights of way), Criterion 11 (proximity to service), Criteria 12 and 13 (school capacity), Criterion 18 (archaeology) Local Lead Flood Authority 1. Given that Sea Level Rise will significantly impact Fenland areas as many already lie below sea level, it is critical that this is considered in detail in the context of any future growth 2. Please also discuss flood risk from other sources. E.g. in Whittlesea there is an issue of groundwater flooding and March there is an issue of surface water flood risk. 3. We understand from other sources that FDC is considering options for a tidal barrier therefore this should also be mentioned in the context of flood risk and sea level rise 4. The Local Plan should commit to working with flood risk stakeholders to lessen the impacts of flooding going forwards by recognising and assessing flood risk, mitigating against it and providing resilience measures to alleviate it. 5. A Strategic Flood Risk Assessment should be prepared and used in assessing the flood risk of development proposals The new Local Plan must be aspirational but deliverable. If the Local Plan is excessive in its requirements, we may fail to meet the area’s growth needs.

We would like to understand your broad priorities for the future growth of Fenland.

As such, we’d really welcome you completing the following question, to help us understand, overall, which issues are most important to you.

## Question 27: Any Other Comments

50002

### Consultee

Title

First Name Jane

Surname Fleming

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50002-1 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

I want Fenland to have an ALDI or LIDL as the Co Op has a monopoly in the town (Whittlesey).

There is a space previously planned for Sainsbury and Tesco neither of which took up the place.

50101

### Consultee

Title

First Name Roger

Surname George

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50101-68 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

No.

50065

### Consultee

Title Mr

First Name Dave

Surname Gibbs

Position

Organisation Tydd St Giles Parish Council

### Agent

Title

Name

Surname

Position

Organisation

50065-4 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

The Parish Council has considered the issue of future development in the village of Tydd St Giles, in consultation with the local community, including a public meeting for this purpose. Their conclusion is that there should be minimal future development. Having conducted a review of potential sites for development, they consider Bees Lane to be their preferred location. They also believe that no further development should be permitted in either Foul Anchor or Four Gotes.



## Question 27: Any Other Comments

50019

### Consultee

Title

First Name Duncan

Surname Godfrey

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50019-1

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

we understand that the Parish Council have put forward the field opposite our property, situated in Newgate Road as suitable land for future development in our village. We object most strongly to any major development for the following reasons; 1. since moving into our property in 2011 we have experienced flooding in our front garden after heavy rain. This has got very close to flooding our house each time. At one time while we were on holiday our neighbours had to bail out our garden and even have a pump to get rid of the water. We feel that this is getting worse due to the bad condition of the dykes and because they are getting infilled. The field that has been chosen by the parish council also floods on a regular basis and therefore does not seem an ideal location for development. 2. Using the field for development with the drainage as it is would prove detrimental to the area as putting housing with more hard surfaces such as drive ways made of concrete there is less garden, field etc. where surface water could naturally drain. 3. The roadways through the village could not cope with more traffic. The main road through the village passes the school. The volume of traffic, the speed of the traffic, especially down Newgate Road is at the moment cause for concern. As Newgate Road is a straight road cars always speed. Children walk and cycle along this road to the school and its surprising an accident has not occurred already. Also traffic is diverted through the village if an accident happens on Sutton Road and the village cant cope as it is. 4. The sewage system is not fit for purpose in the village as it is not able to cope with the amount of properties at present. 5. There are no amenities in the village, no shop, post office, petrol station. 6. There are no job opportunities in the village. We have a golf club and pub but they are fully staffed. 7. The school is not large enough to cope with more pupils. 8. There are no amenities for youth in the village. 9. The majority of people who reside in the village and have moved in recent years to the village have done so because of the quiet life of the village, the views, the close community. This would all be taken away if a development of the scale planned took place. 10. At the village meeting concerning the local plan it was the over whelming view of the many, many villages that attended that this was not a suitable site for new build and the village could not cope or was suitable for such development at all. We hope you take our objections into consideration.

## Question 27: Any Other Comments

50016

Consultee		Agent
Title		Title
First Name	Emma	Name
Surname	Grima	Surname
Position	Director - Commercial	Position
Organisation	East Cambridgeshire District Council	Organisation

50016-3 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

The document is well laid out and makes good use of illustrations. It is easy to navigate with colour coding and section numbering. We note it is very much an open consultation asking questions, rather than making proposals at this stage.

In terms of any cross-boundary strategic matters which might arise between our two areas, as a consequence of your emerging Local Plan, at this early stage only one matter is immediately apparent that could be of consequence, namely transport. Whilst the majority of growth in your district, and the transport implications as a consequence, would likely be of no material consequence to East Cambridgeshire, we will be scrutinising your Plan and its evidence base, as it continues to evolve, for the potential impact on key transport routes from your district through to East Cambridgeshire, in particular the A142. Should your plan lead to significant growth in traffic demands on the road network within East Cambridgeshire, especially in the vicinity of the A142 / A10 junctions near Ely, then we would welcome discussion with you on the suitability of such growth and the proposals you have to mitigate the impacts of such growth on the highway network in East Cambridgeshire. In simple terms, the scale of growth you identify along the Chatteris – Doddington – Wimblington – March corridor (especially any growth beyond what you have already committed to via existing permissions and allocations), the greater the likelihood will be that we would expect evidence to be provided by you to demonstrate what the impact of such growth would be on the East Cambridgeshire highway network, and whether such impact was of significant harm.

50077

Consultee		Agent
Title		Title
First Name	M J	Name
Surname	Hawkins	Surname
Position		Position
Organisation		Organisation

50077-26 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

First part of questionnaire completed 15 November.

## Question 27: Any Other Comments

50033

### Consultee

Title Mr  
First Name Mark  
Surname Hemment  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50033-38

### 27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

In the interim 'Market Town Masterplan for Growth' for Chatteris document – entitled "Chatteris: An Aspirational Community" and hosted on FDC's website; [https://www.fenland.gov.uk/media/15673/Growing-Fenland---Chatteris-InterimReport/pdf/Chatteris\\_Interim\\_Report\\_-\\_FINAL\\_VERSION.pdf](https://www.fenland.gov.uk/media/15673/Growing-Fenland---Chatteris-InterimReport/pdf/Chatteris_Interim_Report_-_FINAL_VERSION.pdf) On p.8, the document has the paragraph; However, there are some challenges in accessing the local countryside. Generally, the number of rights of way is somewhat limited. In a recent consultation "access to more parks and green spaces" was highlighted as the biggest priority for local residents. On p.10; Now, we need to combine these strengths to turbo charge our town and grow our prosperity, providing good jobs, excellent education and green access. The new Local Plan needs to fulfil these 'green ambitions' for Chatteris.

In the same document, under Ambition 4), "Promote our aspirational community to the wider world", is the statement; We have chosen Chatteris Outdoors – to draw on the appeal of the local fen countryside, and the large number of outdoor pursuits in and around the town. Idea 4.1 (on page 18) has four key ideas. Two of them are; 1) In public consultation, when asked to prioritise a list of possible activities, Greater Outdoor Access was chosen as the top priority, outstripping other big priorities such as more regular buses, better career pathways, and a busier high street. 3) Health and outdoor activities are important attracting factors for younger generations and those with families. As we seek to become an aspirational community, this will help us draw in those who will bring vitality and opportunity to our town. These activities are also important for older members of the community for their own health and wellbeing.

From these two points it can be clearly seen that access to outdoor activities are important to Chatteris residents. A nature reserve at Wenny Road Meadow would help to fulfil this stated ambition. There is a local resident who is very interested in running a 'Forest School' from the meadow. With its closeness to two schools; Cromwell (which is expanding with a new primary school) and Glebelands, it would be an important educational asset for pupils learning about nature and the benefits of natural spaces.

The revised National Planning Policy Framework (2019), paragraph 170 states; 170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

Wenny Road Meadow is both beautiful and intrinsic in character. The local community value its landscape and biodiversity. It provides to the local community an area for outdoor recreation (walking, photography, etc), access to a natural green space (physical and mental wellbeing) and is a window into the history of Chatteris. From these statements we believe the Wenny Road Meadow in Chatteris should not be part of a strategic allocation for development. Instead we believe it should be designated as a Local Green Space – Form C has been submitted to the Local Plan Team nominating the meadow for LGS status.

Much has changed since the previous Local Plan consultation. Chatteris residents are more

## Question 27: Any Other Comments

knowledgeable about Wenny Road Meadow. On 12th October, Dr Sarah Spooner (a senior lecturer in landscape history at the University of East Anglia) hosted a local talk entitled "A Landscape History of Wenny Road Meadow". This helped residents to understand the history and importance of this parcel of land. Also, since 2014, many more local residents have become aware that Wenny Road Meadow has been allocated as a development site. In the last two years awareness of the Local Plan has risen. Many residents did not know a Local Plan was being created 2013/2014. With this increased awareness, and a better understanding of the Local Plan process and importance, residents are more determined to save Wenny Road Meadow from development and having it designated as a Local Green Space for future protection.

50128

### Consultee

### Agent

Title

Title

First Name Stephen

Name

Surname Hodson

Surname

Position

Position

Organisation Hodsons

Organisation

50128-60 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Yes, Viability Statements have reduced the amount of social housing previously introduced in the current Local Plan. They should be made public. Large builders currently require 20% profit margin reducing to say 15% would allow more social housing.

50003

### Consultee

### Agent

Title Ms

Title

First Name Ruth

Name

Surname Hufton

Surname

Position

Position

Organisation Doddington Parish Council

Organisation

50003-65 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Section LP3 of the current Local Plan and the Fenland Infrastructure Delivery Plan (Oct 2015) states that 'development in Doddington & Wimblington will be appropriate provided that capacity at, or in the sewerage network leading to the waste water treatment in Doddington can be addressed'

This, eight years on, still has not happened, and we are still building houses that use the current facilities. This means that the only way that Doddington functions, is by the regular use of Anglian Water tankers coming into the village to take away the overflow from our systems. Developers are still allowed to connect into the existing system, and indeed are encouraged by Anglian Water.

Is it not possible for FDC to liaise with Anglian Water to see that this infrastructure is updated. At present what we get is bodged plans from developers which act as bolt-on projects onto an already inadequate system, when what we need is a root and branch restructure of our system.

Could we be advised when this situation is likely to change and could we be given a date that will be adhered to and when we will see a new waste water treatment plant installed in the village.

## Question 27: Any Other Comments

50056

### Consultee

Title Ms  
First Name Shanna  
Surname Jackson  
Position Chartered Town Planner  
Organisation Swann Edwards Architecture Limited

### Agent

Title  
Name  
Surname  
Position  
Organisation

50056-60

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

We would suggest an infill policy which allows for new development amongst a collection of existing buildings in locations not necessarily identified within the settlement hierarchy, similar to the policy within the previous 1993 Local Plan.

50054

### Consultee

Title  
First Name Terry  
Surname Jordan  
Position  
Organisation Wisbech Town Council

### Agent

Title  
Name  
Surname  
Position  
Organisation

50054-1

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Wisbech Town Council considered, at its meeting on 18 November 2019, this consultation document.

The council did not wish to provide individual responses to all of the questions within the consultation response form but, instead, to respond with a few simple key messages, as follows:

- Wisbech Town Council is happy with the existing allocations (some of which are the subject of Broad Concept Plans) for housing and commercial development in Wisbech
  - The Council wishes to see provision in the next Local Plan of an additional crossing over the River Nene
  - The Council wishes to see the re-introduction of rail services for Wisbech
  - The next Local Plan should include the provision of an additional secondary school in Wisbech
- The Town Council would be supportive of any proposals in relation to achieving dualling the A47.

## Question 27: Any Other Comments

50049

### Consultee

Title Ms

First Name Clara

Surname Kerr

Position

Organisation Huntingdonshire District Council

### Agent

Title

Name

Surname

Position

Organisation

50049-1 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Huntingdonshire DC would like to raise several cross border 'strategic matters' as part of the Duty to Co-operate:

1. How the A141 improvements highlighted by the Combined Authority study connect and support the strategic transport routes in place and its potential implications on growth in the area.
2. The potential scaled growth in Chatteris and Whittlesey and any cross boundary implications that may arise for Huntingdonshire.
3. Huntingdonshire are open to working with Fenland on cross boundary issues arising from potential flood risk.

50069

### Consultee

Title Mr

First Name Simon

Surname King

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50069-54 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Improving fibre connectivity is key to creating a more prosperous and sustainable Fenland

## Question 27: Any Other Comments

50116

### Consultee

Title

First Name

Surname

Lifecrown Investments

Position

Organisation

### Agent

Title

Name

Jacob

Surname

Lawrence

Position

Organisation

Geraint John Planning

50116-9

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

We have been instructed on behalf of, Lifecrown Investments, to prepare and submit representations to the Fenland District Council Issues and Options Consultation Document. The document was published in October 2019 with representations due to be submitted by 21st November 2019.

Lifecrown Investments are the site owner and promoter of the site known as Land West of Wisbech Road, Westry. The site lies on the edge of the Market Town of March. A site location plan has been attached to this representation at Appendix A.

These representations seek to respond directly to the key issues raised within the consultation document and will set out how the allocation of the proposed site would help the Council to deliver its housing number in a highly sustainable and logical location.

This submission should be read in conjunction with the separate response provided to the Call for Sites Consultation prepared on behalf of our client and provided under separate cover.

In summary, the submitted representations have responded directly to the issues outlined in the published Issues and Options Consultation Document. We have conveyed our support for the reintroduction of a flexible settlement boundary policy which will allow for certain types of development to come forward throughout the district. Additionally, we suggest the new Local Plan follows a similar settlement hierarchy as the 2014 Local Plan, as shown in Table 1 above. From a detailed assessment of the six growth options our preference is Option 2 which focuses development to the Market Towns of the district.

The site, Land West of Wisbech Road, is located within a logical and sustainable area, on the western periphery of the primary market town of March which benefits from good transport links. We would welcome the opportunity to discuss the site further with Fenland District Council during the new Local Plan Process.

50095

### Consultee

Title

First Name

Barrie

Surname

Luck

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50095-60

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Some of the questions are too big for a survey of this type.

## Question 27: Any Other Comments

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50089

### Consultee

Title

First Name Karen

Surname Luck

Position

Organisation Romain

### Agent

Title

Name

Surname

Position

Organisation

50089-52

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Maybe small dedicated waste water processing for small new developments and reuse grey water to improve water efficiency.

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## Question 27: Any Other Comments

50044

### Consultee

Title Ms  
First Name Debbie  
Surname Mack  
Position Historic Environment Planning Adviser  
Organisation Historic England

### Agent

Title  
Name  
Surname  
Position  
Organisation

50044-16

### 27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Thank you for consulting Historic England on Fenland Local Plan Issues and Options Local Plan stage, Call for Sites and Sustainability Appraisal Scoping. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the Issues and Options consultation and Call for Sites.

#### Call for Sites

Whilst Historic England does not advocate particular sites, we suggest that our published guidance and advice are consulted as you are evaluating sites being brought forward from other parties. It is important to take account of the historic environment when deciding upon which sites will be carried through to the Local Plan.

#### Site Allocations

Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made. Conservation and archaeology staff within the relevant councils should be consulted on matters relating to archaeology, landscape/townscape and the historic environment generally.

We often find that while some of the sites in a Plan identify heritage assets as potential constraints, this is not consistently done for all sites and all heritage assets. There also can be limited information in documents on how sites might be developed, making it difficult for Historic England, and others, to assess their full impact. We are keen that allocated sites include development criteria to guide future proposals, including references to the historic environment where needed (this follows the national Planning Practice Guidance). There is a danger to both heritage assets and potential developers of allocating sites without such criteria and establishing the principle of development without guidance on the issues that need to be addressed at the planning application stage. The significance of heritage assets, and the potential impact of allocations on that significance, will need to be understood and justified.

It should be noted that there are areas of archaeological interest beyond scheduled monuments and historic landscape issues beyond registered historic parks & gardens. Wider archaeological and landscape/townscape impacts are important considerations and need to be factored into site assessment. The possible cumulative impact of a number of site allocations in one location could also cause considerable harm to the historic landscape/townscape.

All sites should be scoped for archaeological potential before taking them forward to the next stage, as there is a high likelihood of archaeological sites not on the HER. Archaeological assessment and evaluation should be in line with the NPPF and best practice guidance so that impacts can be assessed at the earliest opportunity.

## Question 27: Any Other Comments

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### Assessing sites

We note that you have set out your proposed approach to site assessment and selection in the Site Assessment Methodology Report.

We note that you are proposing a two stage process a) distance based followed by b) asking your Conservation Officers/ourselves at Historic England and also the County Archaeology team.

We would comment at this stage that it is unlikely that we will have the capacity to consider all of your sites (given our resources and the 6 counties that we cover), although we may be able to provide focused comments on a selection of sites, depending on our capacity at the time.

We do however provide you with detailed advice below on site assessment methodology.

Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan.

In essence, it is important that you

- a) Identify any heritage assets that may be affected by the potential site allocation.
- b) Understand what contribution the site makes to the significance of the asset
- c) Identify what impact the allocation might have on that significance
- d) Consider maximising enhancements and avoiding harm
- e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness

In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors.

If a site is allocated, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the significance of on-site or nearby heritage assets (noting that significance can be harmed by development within the setting of an asset), the need for high quality design and any other factors relevant to the historic environment and the site in question.

Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal with the Planning Practice Guidance stating “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (Paragraph: 002 Reference ID: 61-002-20190315 Revision date: 15 03 2019). Conservation of the historic environment is a part of the key overarching environment objective (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 185).

### Assessment criteria

Many authorities include a distance based criteria to assess impact on the historic environment. It is important to understand the significance of any heritage assets, and their settings, that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms.

### Heritage Impact Assessments

## Question 27: Any Other Comments

In order to help refine which growth allocations to take forward, we would suggest that a Heritage Impact Assessment is undertaken of each of these sites. This should be proportionate (both to the scale of the site and the assets affected). Again, we would refer you to our Advice Note 3 'The Historic Environment and Site Allocations in Local Plans.

All potential sites will need to be appraised against potential historic environment impacts. It is imperative to have this robust evidence base in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or inter-visibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too.

The following broad steps might be of assistance in terms of assessing sites:

- Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale
- Assess the contribution of the site to the significance of heritage assets on or within its vicinity
- Identify the potential impacts of development upon the significance of heritage asset
- Consider how any harm might be removed or reduced, including reasonable alternatives sites
- Consider how any enhancements could be achieved and maximised
- Consider and set out the public benefits where harm cannot be removed or reduced

The HIAs should assess the suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.

### Further Guidance

We have produced a number of detailed Good Practice Advice and Advice Note documents. We recommend that you review the following as part of your plan preparation process:

The Historic Environment in Local Plan - Good Practice Advice in Planning 1

<<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>>

The Setting of Heritage Assets 2nd ed. - Good Practice Advice in Planning 3

<<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>>

The Historic Environment and Site Allocations and Local Plans - Advice Note 3

<<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>>

### Monitoring

We recommend indicators to measure how successful historic environment policies are. These can include preparation of a local list, completion of conservation area action plans and management plans, reduction in the number of assets that are classified as heritage at risk.

### Glossary

Glossaries should include consistent definitions for all heritage assets mentioned in the local plan. These would typically include:

## Question 27: Any Other Comments

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Listed Buildings

Scheduled Monuments

Conservation Areas

Registered Parks and Gardens

Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings

Mapping

We recommend that designated heritage assets are marked on maps, where appropriate.

Sustainability Appraisal

The historic environment should be considered as part of the sustainability appraisal process. We recommend that these comments should be read alongside our Advice Note 8.

Key Plans and Programmes

We note that you list key Plans, policies and programmes on p117. When considering key plans and programmes, we also recommend the inclusion and consideration of the following:

International/European

- UNESCO World Heritage Convention
- European Landscape Convention
- The Convention for the Protection of the Architectural Heritage of Europe
- The European Convention on the Protection of Archaeological Heritage

National

- Ancient Monuments & Archaeological Areas Act 1979
- Government's statement on the Historic Environment

Local

- Local Plans for neighbouring authorities
- Historic Environment Record
- Heritage/Conservation Strategies
- Other Strategies (e.g. cultural or tourism)
- Conservation Area Character Appraisals and Management Plans
- Listed building Heritage Partnership Agreements

Please also include these at p59 and 60 of the Scoping Report.

Baseline Information

All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens) within the area should be identified. Mapping these assets would provide a greater indication of their distribution and highlights sensitive areas.

We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings. In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the City, Borough or District should be acknowledged and outlined in this section. Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.

Historic England's Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.

## Question 27: Any Other Comments

### Key Sustainability Issues

We would suggest that the starting point for considering Key Sustainability Issues for the Historic Environment should include:

- Conserving and enhancing designated and non-designated heritage assets and the contribution made by to significance by their settings
- Heritage assets at risk from neglect, decay, or development pressures;
- Areas where there is likely to be further significant loss or erosion of landscape/ /townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

We welcome your identification of issues and opportunities and are pleased to see that you have identified key evidence gaps. We would look to see these addressed through the preparation of the Plan. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities. Example opportunities for the historic environment to include within the Sustainability Appraisal can be found in our guidance notes in the links above.

We broadly welcome the key sustainability Objectives. However, we would suggest some slight wording changes to 4.1 to make it clear that it is not the setting per se that is protected, rather the significance of the heritage asset (and any contribution made to that significance by the setting of the asset)

### Method for Generation of Alternatives

The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.

### Conclusion

In preparation of the forthcoming Local Plan we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that the above comments of assistance.

## Question 27: Any Other Comments

50035

### Consultee

Title Mr  
First Name Tim  
Surname Marks  
Position

### Agent

Title  
Name  
Surname  
Position  
Organisation

Organisation MVV Environment Ltd

50035-24 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Waste Transfer Station, Algores Way, Wisbech Land Registry Title Number Title Number CB250067

In preparing its Plan the Council needs to acknowledge the site is safeguarded for waste treatment in the Cambridgeshire and Peterborough Mineral and Waste Site Specific Proposal Plan (2012) site reference W1C and in their emerging Proposed Submission (Publication) Draft (2019) Policy 10 (Waste Management Areas).

50042

### Consultee

Title  
First Name Jane Ann  
Surname Mason  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50042-46 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

There has been a huge public outcry in Chatteris against the proposed development of Wenny Road Meadow. "Our natural environment is our most precious inheritance". Where nature thrives, so do people and other animals. The proposed destruction of our meadow has affected the lives of many residents here in Chatteris. How do we justify such destruction to our children?

## Question 27: Any Other Comments

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50073

### Consultee

Title Mr  
First Name John  
Surname Maxey  
Position  
Organisation Maxey Grounds

### Agent

Title  
Name  
Surname  
Position  
Organisation

50073-68

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Local plan policies must not make development uneconomic. I am concerned at the amount of questions that cover whether it is appropriate to introduce higher standards than national levels, most of which come with additional cost in a challenging viability district. The plan must set realistic targets for s106 and affordable housing levels and use any deficit those policies leave relative to need as grounds to seek the Combined Authority or Government to provide sufficient funding to meet that need. Development can not afford to provide everything that is required

50129

### Consultee

Title Mrs  
First Name J  
Surname Melton  
Position  
Organisation Chatteris Town Council

### Agent

Title  
Name  
Surname  
Position  
Organisation

50129-64

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Swift boxes should be encouraged as part of new builds.

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## Question 27: Any Other Comments

50126

### Consultee

Title

First Name Alan

Surname Melton

Position

Organisation Manea Parish Council

### Agent

Title

Name

Surname

Position

Organisation

50126-68

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Manea Parish is an area of Fenland lying between Chatteris and March, the recent improvements to Boots Bridge has improved the accessibility to Manea from Wimblington, the road from Chatteris via Byall Fen Road is constantly in a state of repair, due to constant agricultural use and aggravated by the extraction works by Mick George Ltd.

Manea has a future of opportunity particularly with the prospect of hourly stops at the Station and the provision of car parking facilities. However, the Council recognises that the work to Ely North may be further delayed which inhibits the frequency of trains from Ely to March. The council recognises that once Ely North problems are sorted, there is significant opportunities for the development of Manea.

Whilst Manea welcomes newcomers to the village, they are worried that the village may become a “dormitory” village, serving only commuters and retired persons.

It is therefore important to attract more local jobs and opportunities. The council is therefore proposing an area of land to be set aside for light industry and start up businesses. There should also be further allocations as the village develops.

Connectivity is also a big issue for Manea, the lack of adequate mobile signals is a barrier to growth and aspiration. 3G/4G signals are very poor or non-existent in the village, there is no chance of 5G!

A recent application for a telephonic mast was recently refused by Fenland Planners, without proper consultation with users and the business community. The reasons for refusal were spurious, to say the least and the Parish Council and villagers are very disappointed.

Whilst Manea Parish Council welcomes more housing, they are concerned at the quality of developments and the impact upon the village. Members wish to see:

- Better design principles incorporating sustainability
- Affordable/Shared ownership provision
- Adequate parking
- Adequate green areas
- Rigorous tree planting
- All development should be accompanied by fully adopted roads and infrastructure conditioned by section 38 agreements or bonded arrangements.
- Rigorous enforcement of s106 conditions for community facilities
- No further concessions via “viability studies”. Land owners and developers will be purchasing sites at current market values, not historical option values.

Specific requests:

- An area at the rear of the Cemetery should be preserved for future expansion
- An area at the rear of Manea Park should be identified as Public Open Space to facilitate the expansion of the park
- The area marked as possible green space on the parcel of land to the west of the village, is indicative and not specific. The council has no objection to the development of this site, but every effort should be made to secure the open space for a future playing field.
- The drawing shows areas marked in green for possible tree planting to create wooded areas.
- The council is aware of flooding issues, developers should demonstrate their methods of mitigation. “The flood plain” should not be used as a blanket reason to stifle development.
- There is a capacity issue regarding the sewage disposal. Developers and planners should continue to pressure Anglian Water to upgrade the sewage requirements. In the short to medium term developers will need to demonstrate the methods of sewage disposal.



## Question 27: Any Other Comments

- The continuation of lobbying to obtain better rail connections and timing.
- The continuation of lobbying for the improvement of the road between Chatteris and Manea.

The Local Plan should insist on minimum tree planting over the next 20 years. On the submitted plan the council has not specified sites but would welcome sustainable development within the village boundary.

## Question 27: Any Other Comments

50028

### Consultee

Title Mr  
First Name Graham  
Surname Moore  
Position Planning Officer  
Organisation Middle Level Commissioners

### Agent

Title  
Name  
Surname  
Position  
Organisation

50028-11

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Question 27: Any Other Issues (page 33)

- The retention and improvement of the rivers, their settings and associated corridors in the District for navigation, environmental, leisure and tourism through the provision of related facilities.

- The provision of a Water Space Strategy.(C) Other Issues

(i) Consultation during the planning process

Whilst the Commissioners and associated Boards no longer provide bespoke responses to the LPA (unless instructed to do so by the relevant RMA or the applicant, if the application is subject to a Pre/ Post-Application Consultation procedure, see section (C) (ii) below), it takes the opportunity and time to contribute to strategic planning documents, such as HELAA, Water Cycle Strategy etc however it is disappointing to advise that our comments are often ignored. Whilst it is appreciated that there are other planning matters to be considered, experience elsewhere within our respective catchments has identified that the failure to fully consider our comments has led to poor solutions which have to be resolved at the ratepayers' expense.

It is appreciated that this document is primarily planning related. However, it must be understood that whilst a planning application may be acceptable to your Council it also needs to be appropriate to other parties if the development is to be viable and buildable with the minimum of delay yet maximising our respective limited resources. Decision makers need to be held more accountable for their involvement in the water level management and flood risk element of a development. The inappropriate raising of a developer's expectations and chasing LPA housing numbers is considered to be the start of a poor surface water disposal solution which, if not considered at this stage, could increase flood risk.

The Commissioners and associated Boards are no longer prepared to resolve, at their expense, problems created by others.

(ii) Early engagement and better design of infrastructure

In accordance with best practice the Commissioners and associated Boards promote early consultation on Masterplans/Development Briefs/planning applications, etc that meet any of the following criteria:

- Being either within or adjacent to a Commissioners' /Boards' watercourse, and/or any other flood defence structure or asset.
- Being within the channel of any other Ordinary Watercourse.
- Where a direct discharge of surface or treated foul effluent water is proposed.
- For any development affecting more than one watercourse and having possible strategic implications.
- In an area of known actual flood risk or "wet spot".

Being within the maintenance access strips provided under the Byelaws.

- Any other application that, in the opinion of the Middle Level Commissioners' Chief Engineer, has material drainage implications.

The Commissioners offer several pre-application consultation procedures, as detailed on our "Pre- & Post-application consultation procedures" document. However, in view of the location of the site and the sensitive nature of the local water level and flood risk management systems the use of the detailed discussion procedure is considered essential.

## Question 27: Any Other Comments

This procedure is intended to guide all parties from the initial concept stage to the approval of navigation, flood risk and water level management and relevant environmental issues prior to applications being submitted. Therefore, increasing the likelihood of meeting the requirements of the Commissioners and/or associated Boards, alleviating the need to oppose applications and discharge conditions and, ultimately, speeding up the associated processes and reducing costs.

In certain situations, as listed above, the Commissioners and associated Boards will require that a Flood Risk Assessment has been supplied as part of an application. The Assessment must meet the Commissioners'/Boards' minimum requirements together with those of the NPPF, the District Council's Strategic Flood Risk Assessment (SFRA), relevant aspects of the Pitt Report, which requires all sources of flooding to be considered, and advise whether there is any material prejudice to the Commissioners'/Boards' systems; local water level management system; water, natural or built environment. The Assessment must be supported by suitable adequate technical data and designs. Failure to do so could lead to the Commissioners/Boards opposing the application concerned. It would also be appropriate for applicants of smaller developments to consider and provide details of a drainage strategy as part of the basic submission. Ideally, it should be submitted and checked by the Commissioners/Boards prior to any application being made.

Any resultant adverse impacts must be considered at the earliest possible stage.

### (iii) Statutory Powers

All the RMA's primary powers are under the Land Drainage Act 1991 and its byelaws, policy statements and other relevant documentation but sections of the Water Industry Act 1991, the Highways Act 1980 and the Flood and Water Management Act 2010 also apply.

The contents of the Middle Level Act 2018 apply to the Commissioners only.

The Commissioners' rivers and the Boards' Drains are protected under their byelaws made under the Land Drainage Act. Consent for works within, under or over the protected watercourses and/or encroachment within the associated 20.0m/9.0m wide maintenance access strip requires the Commissioners'/Boards' prior written consent. In this respect, the Commissioners/Boards promote detailed pre-application consultation as this enables any issues to be dealt with prior to and not during the decision-making process. It should not be assumed that consent will be given by the Commissioners/Boards.

Contravention of the Land Drainage Act, or any other Act, is a criminal offence which could lead to enforcement action being taken against the perpetrator.

### (iv) Hazard mapping and development within the floodplain

The floodplain, its definition, derivation and extents have been an issue not only for the Commissioners and associated Boards but other IDBs since its introduction. This has become of more concern since the elevated importance of the Sequential Test in the National Planning Policy Framework (NPPF).

The definition and extents of a "floodplain" are matters for the planning authority to resolve with the relevant authority who prepared the hazard map, be it the EA for its various flood maps, the LPA, for its SFRA, and/or the LLFA for its Surface Water Management Plan (SWMP). It is acknowledged that whilst there may be specific issues relating to future proposed aspects of development within our catchment we will not oppose it simply because it is within the floodplain.

As you are aware, the main purpose of an IDB is to aim to manage flood risk up to an appropriate SoP. The Commissioners and associated Boards have policy statements available, which identify the SoP that they will seek to provide, floodplain or not.

In addition, the Commissioners and associated Boards do not agree with the generic content of national policy, such as, the NPPF and argue that "The Fens" is a special case and should be considered as such.

### (v) River settings and corridors/Green Infrastructure

As the country's fourth largest navigation authority, the Commissioners generally promote the use and enhancement of our navigation system and are urging the relevant planning authorities to give serious consideration to enhance the setting, access, use and opportunities associated with the navigable rivers and associated river corridors that pass through their area and make a positive impact on the largely rural economy and promote the area as a tourist destination whenever possible, provided that they do not detrimentally affect the Commissioners' statutory water level and flood risk management functions. For example, there may be no objection to small infill developments, say up

## Question 27: Any Other Comments

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to 3 houses, within the extent of the existing urban boundaries, and the replacement of existing properties, to complement and enhance the water setting but they will not permit, under their byelaws, new 'ribbon' development alongside any of their watercourses.

Where possible new riverside properties should "front" onto the watercourse concerned.

It is anticipated that the Great Fen Project will, as it develops, increase navigation on our system and may, as a by-product, increase leisure, recreation and tourism use within your Council's area.

However, the Commissioners do not currently receive monies for the maintenance and improvement of this system and have no definitive plan or programme in respect of navigation.

(vi) Biodiversity and protected habitats and species

Whilst the Commissioners and associated Boards would encourage the principle of increased ecological value and development of water level management and flood defences that provide for the creation of green infrastructure/habitat and recreation, the ability to maintain such systems for their intended use must also be considered. Experience has shown that biodiversity can be supported and improved within a regular maintenance framework of essential maintenance operations but care needs to be taken to ensure that a water level and flood risk management system does not suffer

because of 'green' issues. An example of how these issues can affect what was originally intended as a flood defence, although on a much larger scale, is the Ouse Washes where concerns have been raised about the adverse impact on biodiversity due to flooding.

The Commissioners and associated Boards have nature conservation duties under the Land Drainage Act 1991, the Wildlife and Countryside Act 1981 and are a competent authority under the Conservation (Natural Habitats etc) Regulations 1995, therefore, any works affecting their systems, requiring their consent, or on any works that affect any on-site open watercourses will require an Environmental Statement and a Risk Impact Assessment. The Commissioners are also a partner in the Great Fen Project.

The Commissioners and associated Boards have adopted Biodiversity Action Plans (BAPs) as one of their policies and are committed to their implementation. The BAPs will help the Boards to maximise the biodiversity benefits of their activities and demonstrate their contribution to the Government's UK BAP targets. The plans will be reviewed periodically and updated as appropriate.

Higher temperatures will result in increased evaporation of open water bodies leading to poor quality and will have an adverse impact on biodiversity.

(vii) River Naturalisation

The inclusion of some EA aspirations and parlance within local planning documents is noted. Many of the rivers and most of the other watercourses within your Council's area are not natural but manmade, primarily within the last 600 years. Most are open and not piped or culverted, or otherwise 'modified' and, with the exception of those within the towns or villages, not urbanised, therefore, we are uncertain as to what further re-naturalisation can be undertaken. It is accepted that these requirements do have a place, possibly on the Agency's watercourses, such as, the River Nene and associated Washes system, but it must not be at the expense of making our rivers unmaintainable or at increased flood risk. Failure to do so could have significant consequences, as has been seen elsewhere in the country in recent years.

(viii) Open watercourses

In order to prevent an increase in flood risk, by reducing available hydraulic and water storage capacities, restricted access for maintenance etc and to protect the natural environment, the piping and filling of open watercourses, except as may be necessary to create a means of access across a channel, is generally prohibited.

(ix) Flood Risk & Water Level Management

Flood Defences

Whilst the RMA concerned has particular duties, as discussed elsewhere in this response, and will endeavour to achieve these in accordance with its policy statement, its powers are permissive and, ultimately, under "common law", landowners have the primary responsibility for draining their land, to ensure that they do not create a flood risk to others; managing the flood risk issues; and taking appropriate action to protect their property.

NB. It should be appreciated that it is unlikely that the current level of government funding for water level and flood risk management projects will be available in the future. Therefore, it is likely that

## Question 27: Any Other Comments

funding will be required from other stakeholders, potentially including your Council, if current SoP are to be maintained in the long term.

### Infiltration Devices

Experience with the use of infiltration devices in the area has shown that any infiltration rates are low and, therefore, on the whole they do not work efficiently unless there is a significant amount of space to install them. Unfortunately, housing density and Government targets do not allow sufficient space. In addition, very few people know how to correctly undertake a permeability test, provide the associated calculations and design the devices correctly.

### Sustainable Drainage Systems {SuDS}

The Commissioners and associated Boards generally agree and acknowledge that SuDS are the preferred option in certain situations. However, they are not always the answer to the problem and not always the most suitable. Careful consideration needs to be given to the facility to be used, what is trying to be achieved and the nature of water level management in the area.

Devices such as permeable paving and crate-based systems require valuable resources to be extracted from the ground, heat and energy to make the product and then for it to be transported hundreds of miles to site. Is this sustainable?

Whilst SuDS can generally be incorporated into larger sites, it is often difficult and not viable to use them on smaller sites.

A holistic approach will require considerable master planning, together with the resolution of funding and maintenance issues. Prior funding from an external source, say via the proposed Community Infrastructure Levy, may be required if this is to work correctly.

Given that your Council is within an area which is water stressed, it would be appropriate, where possible, to "think outside the box" and allow for SuDS devices to form part of a hydrological train where the retained water could be used for water harvesting, irrigation purposes etc.

### Treated effluent disposal/Dry weather flows

No reference is made to the adverse impact on flood risk and water quality from increased discharges from Water Recycling Centres (WRCs) or other sources of dry weather flow that is associated with increased "growth"!

### Water efficiency

Within local strategic planning documents water resource issues predominantly refer solely to potable water supply but other water resource issues which exist within the study area, for example, agricultural use, navigation, amenity, biodiversity should also be considered, particularly if drought conditions, like those previously experienced, become more regular, and if the impact of climate change becomes a reality.

It should be remembered that, with the exception of rain falling on the catchment, the Commissioners' primary source of water is the abstraction from the Back River, a tributary of the River Nene, through Stanground Lock. During periods of dry weather this abstraction from the Nene is reduced or ceases and this can detrimentally affect the Commissioners' system. The Nene system also serves Anglian Water's potable water storage reservoirs.

Due to the statutory requirement within the Middle Level System to maintain the navigation level, which takes precedence over water abstraction if, during a long hot summer, there is any risk of dropping below the minimum navigation level, then all abstraction from our system will be curtailed or has to cease. This can potentially last for 4-6 weeks, which obviously has an impact on crop yields, affecting food security, and could have an adverse impact on the Great Fen Project and other amenity biodiversity sites.

Whilst it is appreciated that agriculture, navigation and tourism are not likely to significantly impact on the larger "growth" issues, the study area is likely to remain primarily agriculturally based for the foreseeable future, and will therefore create employment and contribute to the economy. Similarly, navigation and tourism do the same but on a much smaller scale and have sustainability and biodiversity benefits.

The Commissioners have to consider the need to retain both flows and a navigation level. Therefore, it is important that public water supply is balanced against these requirements; for example, the supply of water from the River Nene to the Middle Level. The failure to consider this could have economic and environmental effects on the area.

However, given the current financial climate and the view held by most developers that they already

## Question 27: Any Other Comments

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invest too much into their developments and will want the Councils to contribute more, it is considered that funding from an external source will be required.

In terms of fixtures and fittings, issues such as total water neutrality are not going to be achieved until all 'old' fixtures and fittings are totally replaced by 'sustainable' fittings.

To be fully accepted this policy really needs endorsement from Senior Council Members but they may be reluctant to do this if it restricts development in the area.

(x) Rainwater harvesting/Recycling facilities

The Commissioners and associated Boards promote the use of rainwater collection and grey water recycling, particularly if drought conditions become more regular and the impact of climate change becomes a reality, but consider that such systems should be in addition to but not replace or form any part of a surface water disposal system.

Whilst it is accepted that during normal rainfall events the water recycling facility is likely to prove adequate, during the winter months there may be insufficient volume to store a design event. There are also concerns about the effects on the local systems if the facility is inoperative or during periods when the property is empty. In addition, it is also understood that the majority of tanks require a means of disposal when the units are being cleaned.

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## Question 27: Any Other Comments

50021

### Consultee

Title

First Name Elizabeth

Surname Mugova

Position Sustainable Places Planning Advisor

Organisation Environment Agency

### Agent

Title

Name

Surname

Position

Organisation

50021-12

### 27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Climate Change The focus of climate change on page 21 is on mitigation. There is no discussion of how Local Plan policies will help Fenland district adapt to climate change. We believe that climate change adaptation should be an important consideration of the Local Plan in view of the predicted impacts of climate change on flood risk. We therefore consider that the Plan should identify opportunities to reduce flood risk to existing development in areas of flood risk and include policies that require new development to include appropriate flood risk mitigation measures, taking into account the effects of climate change. The sustainability appraisal scoping report identifies some of these opportunities. The Local Plan should clearly set out how flood risk sequential and exception tests will be applied in the district.

With regard to the sequential test, if settlement boundaries are re-introduced, would the area of search be the settlement boundary? If the whole of an area of search is within Flood Zone 3, will the residual risk in the event of a breach or overtopping of any flood defences be used to further define the level of flood risk? The evidence required to apply the sequential test should be included in the SFRA.

The first part of the exception test requires consideration of what wider sustainability benefits the development will bring that will outweigh the risk posed by flooding. On page 9 of the Issues and Options Consultation document, the second paragraph of the second column provides a good list of the issues that could be considered, including solving issues such as health inequalities, community deprivation, infrastructure deficit and low skills.

With regard to the second part of the exception test, how will it be determined whether a proposed development will be safe for its lifetime? When will a flood warning and evacuation plan be required to demonstrate that a development will be safe?

Water Cycle Study We support the aspiration to update the Water Cycle Study, last published in 2012, to inform the Local Plan. The Council should work closely with Anglian Water Services in order to get an accurate picture of what the current situation is and how projected growth is thought to have an impact on their services.

Water Resources Comments Anglian Water has published a revised draft Water Resources Management Plan (WRMP) (November 2019), which sets out how the company will maintain customer supplies over the period 2020- 2045. The plan can be viewed here: <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/draft-waterresources-management-plan/>.

The company's assessment is that it will have sufficient supplies to meet this growth but will need to develop a strategic grid to achieve this. This will involve transferring water from Lincolnshire to areas where deficits in supply are predicted. They also seek to reduce individual customer demands and reduce leakage.

We recommend that the Council considers the long term viability of supplying any new development and how the phasing of growth links to the timings of this planned new strategic scheme.

## Question 27: Any Other Comments

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The Anglian River Basin Management Plan (RBMP) considered the status of all rivers and aquifers in the Region and looked at what it would take to ensure they met good ecological status and reverse the over abstraction related to historical licensing of water. The measures required to make these improvements were subject to a cost benefit test. The assessment of the measures needed to get the entire aquifer and river system back to supporting good ecological status were deemed to be disproportionately expensive. The plan did approve some measures to improve the status of the rivers that were failing to meet their ecological flow needs where it was cost beneficial. The RBMP is available at <https://www.gov.uk/government/publications/anglian-riverbasin-district-river-basin-management-plan>.

Given the pressure the chalk aquifer faces, we cannot rule out future further reductions in the supplies available to Anglian Water to prevent deterioration of the water related ecology. At this point, we are not planning on any further reductions before 2025, but there is a high likelihood that further reductions could be required after this period. Any resultant loss in available supplies would need to be addressed in the company's next WRMP (2024).

Due to the pressures on local water resources and the potential risk of deterioration as a result of increased levels of abstraction, we would advise that any new development in the Fenland area aims for the highest levels of water efficiency. The Council should also seek Anglian Water's assurance that it can meet the needs of growth without causing deterioration. Government allows local plans to specify optional standards with regards to water efficiency targets in new homes. Building regulations specify a target use of 125 litres per person per day. It is recommended that the optional standard of 110 litres per person per day is included in the local plan with the aspiration for the target to be even lower than this. This is due to the water stress of the area as detailed above.

Water Quality Good water quality is linked to healthy, well-functioning ecosystems. A failure to step up river restoration and enhancements risks to cancel out upgrades in wastewater treatment and compromise the achievement of Good Ecological Status. River restoration and net gain in blue infrastructure should complement improvements in wastewater treatment.

The best use of land for the benefit of people, healthy ecosystems and water quality should ensure no encroachment on river corridors, where green infrastructure and blue infrastructure should go hand-in-hand, recognising the importance of water to support habitats and biodiversity. If water quality and quantity were compromised, this would lead to further decline of biodiversity. By enhancing and protecting biodiversity and achieving net gain in catchments, WFD status can be protected and enhanced as an additional result. The reduction of biodiversity can have negative consequences to an area that are hard to predict and as such it is important to keep it as varied as possible.

Keeping biodiversity healthy in the environment has many other benefits. Wetlands, for example, act as natural filters for surface waters, and are used in waste water treatment. A combination of the soil type, the water plants in the wetland and the microbes around their roots are all part of the filtration process. Flood plains and wash lands act as a natural way of managing excess water from flooding. When an ecosystem is negatively impacted these additional environmental benefits can be lost.

Surface and groundwater abstractions for domestic, industrial and agricultural use can exacerbate problems in water bodies, leaving stretches of depleted and dried up rivers, lakes and wetlands. This can have serious impacts on freshwater ecosystems and other wetland habitats such as marshes and water meadows, which may already be under stress by drought and other urban developments.

The water environment impacts significantly on the wider ecology and should be looked at in detail when creating plans. It would be highly beneficial when creating strategies to protect and enhance biodiversity, to give some instruction and guidance about finding opportunities to protect, enhance and maintain water quality, which would in turn contribute greatly to protecting, preserving, enhancing and maintaining biodiversity.

Taking advantage of the open land in parks, open recreational green areas, road corridors, and private gardens can all maintain and even enhance biodiversity in the area, if managed correctly. When



## Question 27: Any Other Comments

opportunities are sought out and correctly implemented, wildlife, waterbodies and flora can thrive in towns. It would be good to have some sort of awareness campaign that highlights how the design of the development is good practice for sustainable green and blue infrastructure and why it is important to protect it. Urban development directly impacts on biodiversity when it modifies existing wildlife, as such it is vital that mitigation measures are in place for things like new housing, industrial development and transport infrastructure. When looking at public footpaths and cycle paths, it is important to review current green and blue corridors to see if these can be utilised for this. By investing in this and increasing the amenity value of them, it will help encourage people to use them.

Sustainability Appraisal Scoping Report Paragraph 3.5.22 states that 'there may be a number of alternative ways to deal with flood risk that need to be explored particularly at a strategic level rather than relying on the nationally prescribed one size fits all approach as set out in the NPPF'. While we recognise that there are particular challenges in dealing with flood risk in the Fenland area, it still needs to be ensured that the Local Plan complies with the NPPF. We recommend that local evidence, such as hazard / breach mapping, is used to develop more locally tailored policies relating to the location of new development and the application of the sequential and exception tests.

We agree with the evidence gaps identified on page 73. However, the last bullet point on 'Key Opportunities' is vague – "Royal Haskoning modelling of River Nene tidal impact'. We are unsure of what this means - over and above our existing Tidal Hazard mapping?

Section 3.7.14 states that 'the majority of abstraction occurs during the winter months when river levels are highest'. This is not accurate for the Fenland district which is agricultural rich and has significant abstraction during the summer from the Internal Drainage Board systems. The majority of abstraction licences in this area have conditions that limit their impact on the environment. The drains in the level based systems are highly managed and flows vary throughout the year. Therefore, water flow tends not to be the main influence on the aquatic environment of these drains.

It is not clear how different development scenarios (detailed in part A of the Local Plan Issues and Options Consultation) will be assessed through the sustainability appraisal process, in terms of how current and future flood risks could affect these scenarios. It is important that the impact of flood risk on these scenarios is evaluated as this could be a major factor in determining which of these scenarios will be the most sustainable development option.

The sustainability appraisal should identify opportunities for flood risk reduction, linking to question 26 of the Issues and Options document. This should include opportunities for using SuDS to deliver a net reduction in flood risk. While there are opportunities to design and implement SuDS that are multifunctional and improve water quality, as well as biodiversity and amenity, they should always be designed to have a key flood risk management function. The sustainability appraisal should therefore identify the use of SuDS (as well as other measures) in the context of opportunities for net flood risk reduction to both proposed and existing developments. The sustainability appraisal should also consider the findings of the baseline FRM for the Future report and identify opportunities for reducing flood risk through the improvement of existing flood defences.

We are pleased to see that the Sustainability Appraisal Framework includes 'development in flood zone 1 making a contribution to flood risk reduction' as a positive effect. We assume this relates to the use of SuDS mentioned above.

Under the 'negative effect' column of objective 5.2, this can result in 'development in FZ1 making no contribution to flood risk'.

Using the 'amount of development approved in each flood risk category' as an indicator for resilience to climate change and flood risk may be too simplistic in Fenland district as this indicator does not take into account the presence of flood defences. The amount of development approved in areas within the extent of any breach/hazard mapping may be a better indicator of objective 5.2.

## Question 27: Any Other Comments

We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.

50051

### Consultee

Title Mr  
First Name E  
Surname Murat  
Position Parish Council Clerk  
Organisation Parson Drove Parish Council

### Agent

Title  
Name  
Surname  
Position  
Organisation

50051-13 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**  
Please refer to our Neighbourhood Development Plan.

50015

### Consultee

Title Mr  
First Name Geoff  
Surname Newham  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50015-54 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**  
More timely and more widespread meaningful road maintenance and not only on major roads.  
Define responsibility for dealing with fly-tipping and who should deal with it. Don't outprice dumps and recycling centres thereby encouraging fly tipping in our rural areas.  
Use current resources optimally.

## Question 27: Any Other Comments

50023

### Consultee

Title Ms  
First Name Janet  
Surname Nuttall  
Position Sustainable Land Use Advisor  
Organisation Natural England

### Agent

Title  
Name  
Surname  
Position  
Organisation

50023-16

### 27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Air pollution We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic<sup>4</sup>, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.

Tranquillity The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 100 and 180 of the NPPF. The CPRE have mapped areas of tranquillity which are available here and are a helpful source of evidence for the Local Plan and Sustainability Appraisal. Neighbourhood Planning Site Assessment Natural England is unable to put forward new sites for future development or Local Green Space designation. In addition to Local Green Space perhaps the call for sites could include a request for sites to be offered for delivery of net gain for biodiversity and green infrastructure.

Our advice is that site assessment methodology should be based upon a robust and credible assessment of deliverability, the suitability of the land and surrounding environment to accommodate the proposed development, as well as the potential contribution towards sustainable development. We welcome, as indicated in the Sustainability Appraisal, that preference will be given to allocating sites on brownfield / previously developed land to protect BMV land, noting that these can support important biodiversity.

When assessing Site Allocations we would urge your authority to use Natural England's Impact Risk Zones, which are available for your authority to download or through [www.magic.gov.uk](http://www.magic.gov.uk), to identify where development may have an impact on designated sites. Impacts and mitigation requirements should be identified through the Sustainability Appraisal. The delivery of mitigation measures will need to be secured through relevant Plan policies. Water resource / quality impacts and the effects of increased recreational pressure on SSSIs are likely to be key issues which need to be addressed for some of the settlements identified. The scale of residential growth is significant hence the combined effects of proposed development will need to be considered where relevant.

In accordance with paragraph 171 of NPPF, the plan should allocate land with the least environmental or

## Question 27: Any Other Comments

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amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

**Sustainability Appraisal Scoping Report** We are satisfied that the Sustainability Appraisal (SA) Scoping Report for the Fenland Local Plan (October 2019) has been prepared in a proper, logical and comprehensive manner and seeks to integrate the requirements of the Strategic Environmental Assessment (SEA) Directive, into the SA process. The approach to SA, as set out in the Scoping Report, including sustainability objectives, assessment methodology, consideration of relevant plans, policies and programmes and the SA framework appears to generally accord with the requirements of the Planning and Compulsory Purchase Act 2004. The report proposes to address relevant Sustainability Appraisal themes and topics relating to the natural environment including biodiversity and geodiversity, agriculture, open space provision, transport, air quality, water resources and resilience to climate change and flood risk.

Please note that a Habitats Regulations Assessment (HRA) will need to be prepared to assess the likely significant effects of the Local Plan allocations and policies on European sites within and beyond the boundary of Fenland District in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). The findings and recommendations of the HRA will need to inform the Sustainability Appraisal.

We welcome recognition that the Cambridgeshire Green Infrastructure Strategy Review has identified priority areas and habitats to protect and enhance the ecological network, noting that the Cambridgeshire Fens are (seen as) a superb refuge for England's biodiversity whilst also being exceptionally important for food production and as a carbon store. Natural England's advice is that the new Fenland Local Plan presents a unique and significant opportunity for development within the district, which sits in the heart of the Fens, to protect and enhance the ecological network. The  
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Plan should identify enhancement projects and secure delivery of these through the relevant allocation and biodiversity policies.

**Health and Wellbeing** Natural England welcomes recognition of the importance of the provision of publicly accessible open space for people's health and wellbeing and the deficit in this crucial resource across the district. This is borne out in Natural England's Cambridgeshire Accessible Natural Greenspace Analysis 2010. The new Local Plan offers a significant opportunity to address this through the preparation of a green infrastructure strategy, as discussed above, and securing its delivery (open space, biodiversity rich habitat, community orchards, allotments etc.) through development with appropriate plan policy requirements. We note that passing reference is made to this in the key opportunities section, alongside reference to the UNESCO Fen Biosphere application. We welcome the key sustainability objective to:

'Create and enhance multifunctional open space that is accessible, links with a high quality green infrastructure network and improves opportunities for people to access and appreciate wildlife and wild places;

Our advice is that a strategy should be developed to identify opportunities and project to deliver this objective; the projects should be implemented through requirements in the Local Plan allocation / major development and biodiversity policies. The indicator for this objective should be measurable net gain in area and/or quality of accessible open space.

**Transport** We welcome recognition of key opportunities and related SA objective to encourage non-car travel, including improvements to public transport and walking and cycling facilities, for the health and environmental benefits these could deliver.

## Question 27: Any Other Comments

Heritage, Place-making and Landscape Natural England supports the key sustainability appraisal objective to retain the distinctive character of Fenland's landscape, recognising the application for a UNESCO Fens Biosphere designation as a key opportunity.

Resilience to Climate Change and Flood Risk We welcome identification of key opportunities to address increase resilience to climate change and flood risk including increases in renewable and low carbon energy schemes where these can be demonstrated to have no adverse impact on ecology including designated sites.

Land Use and Wildlife We welcome consideration of biodiversity and geodiversity, including designated sites, and agriculture as key sustainability topics. Additional relevant plans and strategies for consideration include: <sup>4</sup> The Cambridgeshire and Peterborough Strategic Spatial Framework (non-statutory): Towards a Sustainable Growth Strategy to 2050 aims to ensure that the updated green infrastructure strategies for the area and natural capital and biodiversity principles are reflected appropriately in the development of the Strategic Spatial Framework. This will include a particular focus on strategically important sites and sites with valued public access opportunities. <sup>5</sup> Natural England's Monitor of Engagement with the Natural Environment identifies the multiple health and wellbeing benefits associated with people's engagement with the natural environment and wildlife.

Natural England welcomes identification of key issues including loss of biodiversity, presence of high grade agricultural land and pressure from development on greenfield sites. The SA identifies the presence of nationally and internationally designated sites as a key opportunity but does not clarify what opportunity this presents. Our advice is that this should be linked to the key opportunities for delivering habitat creation to better connect wildlife sites and the 'doubling nature' opportunity.

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Please note that Fenland's nationally and internationally designated sites are of primary importance for populations of wild birds, grassland and wetland habitats.

We support key sustainability objectives including minimising irreversible loss of BMV land, prioritising brownfield sites for development, minimising impacts to biodiversity and geodiversity and achieving net gains to create an enhanced ecological network resilient to climate change. Our advice is that the soils objective should be expanded to include protection and enhancement of the important fenland peat soil resource. The positive indicator for this objective should be no net loss of BMV land and area of peat soils protected and enhanced. Our advice is that a green infrastructure strategy should be prepared to identify projects to deliver these objectives through Local Plan developer requirements. An additional positive indicator for this objective should be delivery of projects and measurable net gain in biodiversity / green infrastructure.

Water Resources Natural England welcomes key sustainability appraisal objectives to minimise water consumption and to enhance water quality for the benefits this will provide for the natural environment, particularly through the incorporation of multi-functional SUDs.

Pollution and Waste We support key objectives to reduce greenhouse gas emissions and other pollutants to air and to reduce risk of pollution through contaminated land, for the benefits this will have for the natural environment.

Sustainable Resources Natural England welcomes key sustainability appraisal objectives to increase use of renewable and low carbon energy sources where it can be demonstrated that there will be no adverse ecological effect including impacts to designated sites.

<sup>4</sup> The ecological effects of diffuse air pollution (2004) English Nature Research Report 580 Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency  
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## Question 27: Any Other Comments

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Our advice is that Neighbourhood Plans should seek to protect and enhance the natural environment, including designated sites, BMV land and peat soils, and to deliver net gains for biodiversity and green infrastructure consistent with Local Plan requirements and the advice provided here by Natural England.

50037

### Consultee

### Agent

Title

Title

First Name      Stewart

Name

Surname        Patience

Surname

Position        Spatial Planning Manager

Position

Organisation    Anglian Water Services Ltd

Organisation

50037-11

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

The presence of Anglian Water's existing infrastructure should be considered as part of any amenity district wide policy to ensure that new development proposals do not prejudice the continued operation of existing water recycling centres. The onus should be on applicants to demonstrate that occupied land and buildings can be brought forward without have any amenity impacts from existing uses through the preparation of an odour assessment. Mitigation will not always be feasible particularly on residential sites and any impacts should be avoided by site design and layout wherever possible.

Similarly any allocation site allocation policies should refer to the existing water mains and sewers (where relevant) to ensure that we can continue to access this infrastructure for the benefit of our customers

Where a sewerage pumping station is located within the vicinity of an allocation site or development proposals we would expect occupied land and buildings to be located at least 15m from existing pumping stations to avoid any associated amenity impacts.

50011

### Consultee

### Agent

Title

Title

First Name      Alex

Name

Surname        Patrick

Surname

Position

Position

Organisation    Alexandra Design

Organisation

50011-35

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

South Holland have a lot of flooding areas and they work pro-actively with developers to achieve the housing requirements and achieve National Policy, fenland are difficult to achieve a happy medium when the majority of sites are in zone 3 infrastructure needs to be improved to accommodate new dwellings for the future.

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## Question 27: Any Other Comments

50008

Consultee

Agent

Title

Title

First Name John

Name

Surname Revell

Surname

Position

Position

Organisation

Organisation

50008-4 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Please thank the Local Plan Team for the clear and comprehensive consultation document. I am retired and own a private narrowboat built by the long established local firm of Fox Narrowboats of March and moored in their marina.

High levels of employment, good housing and transport links are clearly essential now and in the future but so are the environment and health and well being.

Page 20

I note the statement on page 20 that life expectancy, obesity and physical activity in Fenland are all significantly worse than the England average. Improving these aspects is not simply a case of reducing fast food outlets near schools. Those simply driving cars or lorries through the Fens for the first time may think the area is flat and boring and offering little scope for recreational and leisure activities but step aside a few metres and the opposite is often the case. as anyone who has visited the Netherlands will also have found.

The network of rivers in Fenland provide essential flood control and irrigation for some of the most productive agricultural land in the UK. Improving paths and tracks that border the rivers is a cost effective way to increase local leisure activities whether for fishermen, bird watchers, those walking dogs, those ambling or pushing prams or the keen long distance walkers. The lack of hills also mean that the paths will normally be flat and suitable for disabled people in wheelchairs.

Boating on the Middle Level is great and it's a real shame that so few people do so. You can escape the noise and bustle of urban life and national politics in a few minutes. You can have an armchair view of wildlife and some of the best sunsets in the UK. The new Middle Level Act provides a real opportunity to enhance the environment and leisure opportunities, to improve boating facilities that will directly benefit boaters and bring investment and employment to Fenland.

Q17 Park Homes and Houseboats

I welcome the mention of Park Homes and Houseboats on P26. If Fenland wishes to encourage residential caravans and residential boats as part of the housing mix dedicated sites are needed with proper facilities including electrical power, refuse and sanitation.

Boats, caravans and motor homes visiting or travelling through Fenland provide welcome income to local businesses.. On the other hand boats, caravans, old coaches etc squatting and never moving create few benefits but many problems for local communities. The recent introduction of 36 hour moorings by March Town Bridge (probably the most important and convenient mooring on the entire Middle Level for shops, market, pubs, banks etc)) is very welcome. Those who block the moorings and flout the new rules should be pursued.

The proposed navigation bylaws under the Middle Level Act which are being drawn up should be helpful particularly the ability to insist that boats are insured and meet essential safety standards.

Other matters

## Question 27: Any Other Comments

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Small changes matter. For example the increase in the number of trains stopping at Manea was a significant step offering an alternative route to and from Ely when the A1101 at Welney is flooded and impassable.

Separate provision for walkers and cyclists along the A141 would be beneficial and save lives. The separate cycle / pedestrian path along the A142 provides a model. On a wet Sunday morning in November I counted several walkers, joggers and cyclists using the newly created path beside the A142 between the turnings for Witcham and Witchford

50082

### Consultee

Title

First Name Bryan

Surname Rose

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50082-67

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

At present no one understands the local areas current positions in regards to, infrastructure, utilities, highways, communications, transport etc. before any areas, are set aside, quotes set independent surveys must be undertake and the results of these maintained to ensure capacity is not exceeded.

50094

### Consultee

Title

First Name Gerald

Surname Seabrook

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50094-36

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

My main objective is to leave the established villages as they are ,as they cannot support anymore-sewer/waste,traffic etc,and focus on land that is standing idle eg empty industrial areas which already have these requirements

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## Question 27: Any Other Comments

50057

### Consultee

Title

First Name Tim

Surname Slater

Position

Organisation Peter Humphrey Associates

### Agent

Title

Name

Surname

Position

Organisation

50057-4 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Waste Transfer Station, Algores Way, Wisbech  
Land Registry Title Number Title Number CB250067

In preparing its Plan the Council needs to acknowledge the site is safeguarded for waste treatment in the Cambridgeshire and Peterborough Mineral and Waste Site Specific Proposal Plan (2012) site reference W1C and in their emerging Proposed Submission (Publication) Draft (2019) Policy 10 (Waste Management Areas).

## Question 27: Any Other Comments

50058

### Consultee

Title

First Name Michael

Surname Stevens

Position Enabling Digital Delivery Project Mana

Organisation Connecting Cambridgeshire

### Agent

Title

Name

Surname

Position

Organisation

50058-1 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

I work in the Connecting Cambridgeshire team at Cambridgeshire County Council. I understand that specific policies have not been included at this stage however I wanted to take the opportunity to request that a policy relating to Digital Infrastructure is included within the Local Plan. Please find my comments in relation to this in the text below:

“The National Planning Policy Framework describes the importance of ‘Supporting high quality communications’ within a Local Plan including its role being ‘essential for economic growth and social well-being’. The availability of highly quality communications facilitates modern businesses operations from payments to supply chain management to research projects as well providing access to residents for online services, education and an ability to stay in contact with family & friends.

The importance of high quality gigabit capable digital connectivity has been highlighted by the Government setting a target of having full fibre coverage across the UK by 2033 as well as recently announcing their investment alongside Mobile Network Operators (MNOs) in a Shared Rural Network (SRN) to significantly reduce rural ‘not-spots’ where mobile coverage is unavailable across the UK.

Going forward it is essential that Digital Infrastructure is included in the detailed design of new developments to ensure the benefits of high quality gigabit capable digital connectivity are realised for all residents and businesses. This needs to be included in the planning policy as:

- Any new development of any size by default will not have Full Fibre connectivity without engagement with suppliers and having the right infrastructure installed.
- A new development site may have poor mobile coverage and/or impact on the capacity of a MNO’s existing network without a requirement to review the current situation and facilitating improvements if required.
- The availability of Full Fibre technology is considered to be a pre-requisite of future 5G rollout and other future facing technologies.

Ensuring Digital Infrastructure is included in the Local Plan and therefore development design provides multiple benefits to developers, service providers, local councils, highway authorities, businesses and residents:

- It ensures the design and equipment locations for communication infrastructure are integrated in to the full design of the development.
- There is a significantly lower cost to install ducts, chambers, power cables and cabinets at a time when footways/carriageways are being constructed and other utilities installed.
- Disruption to residents and commuters is minimised by ensuring a majority of the construction work takes place at the same time and primarily before occupation.
- The quality of finish for new surfaces, in particular footways and carriageways is maintained by avoiding the need to retrofit underground apparatus.
- The availability of high quality communications is becoming an increasingly important factor for potential residents and businesses in their location decisions.

Failure to include Digital Infrastructure as part of the development design and site construction is likely to lead to significant delays in the provision of high quality gigabit capable communications to the

## Question 27: Any Other Comments

development. This is due to the higher costs and inherent additional difficulties in retrofitting infrastructure where suppliers are likely to be prioritise other locations where there will be a quicker return on investment.”

The Connecting Cambridgeshire team would be happy to help develop this policy to fit Fenland’s growth ambitions and I have attached an early draft example of what this might look like going forward subject to further input from yourselves and other stakeholders to ensure it is appropriate for use.

50026

### Consultee

Title Mr  
First Name Jonathan  
Surname Stone  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50026-68

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

We have been working with our Cambridgeshire and Peterborough Sustainability and Transformation Partnership colleagues in developing the local system’s response to the NHS Long Term Plan and would like to share this with you, along with the Cambridgeshire and Peterborough Joint Health and Wellbeing Strategy. Once these are both finalised we will share with you.

## Question 27: Any Other Comments

50045

### Consultee

Title Ms  
First Name Georgie  
Surname Sutton  
Position Marine Planning Officer (East)  
Organisation Marine Management Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50045-1 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the East Inshore and East Offshore Marine Plans are of relevance. The East Marine Plans cover the area from Flamborough Head to Felixstowe, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the East Inshore and East Offshore Marine Plans, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, the Marine Information System and the Planning Advisory Service soundness self-assessment checklist.

Marine Licensing The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area. The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters. The marine licensing team are responsible for consenting and regulating any activity that occurs "below mean high water springs" level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Summary notes Please see below suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to your local plan. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the East Marine Plans is completed:

- ☐ EC2: Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.
- ☐ EC3: Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported.
- ☐ SOC1: Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported.
- ☐ SOC2: Proposals that may affect heritage assets should demonstrate, in order of preference: a) that they will not compromise or harm elements which contribute to the significance of the heritage asset b) how, if there is compromise or harm to a heritage asset, this will be minimised c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset
- ☐ BIO1: Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas

## Question 27: Any Other Comments

(marine, terrestrial).

☑ BIO2: Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests. ☑ CC1: Proposals should take account of: ☑ how they may be impacted upon by, and respond to, climate change over their lifetime and ☑ how they may impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts. ☑ CC2: Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal. ☑ WIND1: Developments requiring authorisation, that are in or could affect sites held under a lease or an agreement for lease that has been granted by The Crown Estate for development of an Offshore Wind Farm, should not be authorised unless a) they can clearly demonstrate that they will not compromise the construction, operation, maintenance, or decommissioning of the Offshore Wind Farm b) the lease/agreement for lease has been surrendered back to The Crown Estate and not been re-tendered c) the lease/agreement for lease has been terminated by the Secretary of State d) in other exceptional circumstances ☑ TR3: Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported.

As previously stated, these are recommendations and we suggest that your own interpretation of the East Marine Plans is completed. We would also recommend you consult the following references for further information: East Inshore and East Offshore Marine Plans and Marine Information System.

50088

### Consultee

### Agent

Title

Title

First Name Richard

Name

Surname Tester

Surname

Position

Position

Organisation

Organisation

50088-65

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Questionnaire through necessity is very long and i am not convinced many people would spend the hours I have in answering all the questions. As with all long questionnaires the questions further on in the list will not be answered in as much detail as at the beginning....that's why really important questions are normally hidden at the end! Otherwise all OK.

## Question 27: Any Other Comments

50034

Consultee		Agent	
Title		Title	
First Name	Katie	Name	
Surname	Thornley	Surname	
Position	Senior Finance Manager	Position	
Organisation	Cambridgeshire and Peterborough Sus	Organisation	

50034-66 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

We would like to share our local response to the NHS Long Term Plan with you, it is in the process of being finalised and so will send a copy across once this is available as it helps to give a view of our 5 year plans.

As per the National Planning Policy Guidance (NPPG) we would expect the recommendations/findings of the C&P Health and Wellbeing Strategy to be reflected in the Fenland Local Plan. The Health and Wellbeing Strategy which is currently being developed across Cambridgeshire and Peterborough and which has had input from representatives from Fenland District Council.

50030

Consultee		Agent	
Title		Title	
First Name	Kate	Name	
Surname	Waller	Surname	
Position		Position	
Organisation	Elm Parish Council	Organisation	

50030-67 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

The Council's priorities are improvements to rail, traffic and road management

## Question 27: Any Other Comments

50050

Consultee		Agent
Title		Title
First Name	Lynda	Name
Surname	Warth	Surname
Position	County Access & Bridleways Officer –	Position
Organisation	British Horse Society	Organisation

50050-10 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

There are estimated to be 25,500 horses in Cambridgeshire excluding the racing industry. The Equestrian Industry is the second largest rural employer and generates £91.8 million per annum (excluding the racing industry) for the local economy including diversification opportunities for landowners, farriers, feed merchants and growers, vets, instructors, saddlers, tack shops etc. etc. Most horse riders hack their horses out and this requires safe, off road access. According to the BHS statistics, the East has one of the worst records for on road accidents involving horses and their riders.

Fenland is a relatively cheap area in which to live with good access to grazing opportunities and as a result, the equestrian population is high. It is therefore essential that any Local Plans recognise and include equestrian access in the same breath as the need for safe access for pedestrians and cyclists. It is hugely disappointing to note that the Fenland Local Plan consultation contains no reference to equestrians nor any reference that I can find to the Rights of Way network. This needs to be rectified as this process goes forward.

50024

Consultee		Agent
Title	Mr	Title
First Name	Lawrence	Name
Surname	Weetman	Surname
Position	Chairman	Position
Organisation	Chatteris Past, Present & Future	Organisation

50024-58 **27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

We are particularly concerned that this plan wasn't well publicised.

The society also considers the whole process to have been rather daunting, and that FDC could have taken more innovative steps to try and gain public input. For example, by breaking out the most important segments (e.g, the parts around the growth strategy) and publicising this via social media, returnable postcards in letterboxes, etc, to obtain a wider range of views on the most important aspects of the consultation.

The fact that we, as a group of individuals who are especially interested in these matters, have found this process to be challenging suggests that it is likely that many members of the public will have been put off responding by a 26 page form containing many dozens of questions and sub-questions.

## Question 27: Any Other Comments

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50001

### Consultee

Title

First Name Alan

Surname Wheeldon

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50001-65

**27a) Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

The emphasis should be placed not on quantity but on quality. Quality of life. The question should be asked of each development. How is this going to improve the quality of life for the people living there.

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