



Fenland Local Plan

Issues and Options Consultation: Report on Key Issues Raised

February 2020

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Issues and Options Consultation: Report on Key Issues Raised

1. Introduction

- 1.1 Consultation on the Issues and Options Consultation document took place between 11 October and 21 November 2019. The timeframe for the production and adoption of the Fenland Local Plan is as follows:

Issues and Options Consultation	October 2019	
Draft Local Plan	Summer 2020	
Final Draft Local Plan for consultation ('Proposed Submission Draft Local Plan')	February 2021	
Examination of Local Plan	Summer 2021	
Adoption of Local Plan	February 2020	

- 1.2 The Fenland Local Plan Team wishes to thank all those who took the time to comment during the Issues and Options consultation.
- 1.3 All responses received during the consultation period have been read and will be given due consideration as we prepare the first draft of the Fenland Local Plan.
- 1.4 This report identifies the key issues raised during the Issues and Options consultation. A total of 3,990 comments were received on the Issues and Options Consultation from 129 individuals or organisations. All comments received during the consultation on the Issues and Options document, including those submitted via post or email, are available to view in full at:
<https://www.fenland.gov.uk/article/14644>
- 1.5 The Fenland Local Plan Team's response to each of the key issues highlighted is not included in this report, all issues raised are still being carefully considered together with other relevant considerations, such as changes to national planning policy. In due course we will publish an Evidence Report for each of the policies in the draft version of the Local Plan, which will be available on our website. These Evidence Reports will include detailed commentary on how we have considered your representations in finalising the proposed Local Plan.
- 1.6 As part of the consultation we carried out a call for sites, we received 291 new sites all of which will be assessed against a detailed assessment criteria to determine if the site is suitable for allocation in the Draft Plan. [The Strategic Housing Economic Land Availability Assessment](#) (SHELAA) (January 2020) lists all sites suggested to the Council as well as sites identified in the adopted Local Plan and with planning permission.
- 1.6 A total of 14 Local Green Space designations have also been proposed. All sites are listed in the [Local Green Space Report](#) (January 2020) which set out the site assessment methodology.
- 1.7 Any proposed Site Allocation or Local Green Spaces will be consulted on at the Draft Local Plan stage, and evidence reports produced showing the Council's decision to include a site or not.

2. Summary of key issues raised during the Issues and Options Consultation

2.1 This section provides a summary of key issues raised for each question in the Issues and Options Consultation document.

Question 1: The Vision

Local Plans should set out a clear vision for what an area will be like at the end of the plan's life (known as a plan period) and a list of objectives intended to achieve that vision. The vision and objectives in a Local Plan should provide a framework for the policies in the plan to sit within.

Please tell us what Fenland should be like in the future.

1) What is your vision for Fenland - what should Fenland be like in the future?

Summary of issues raised

A total of 67 responses received to this question. There was some support for the existing vision for Fenland, some comments suggesting it could be more ambitious.

The following issues were raised:

Infrastructure:

One of the main issues raised is provision of infrastructure to support growth and local communities including:

- Affordable homes.
- Jobs for local people.
- Schools and education.
- Health facilities.
- Sewage.
- Higher speed internet access.

Transport:

Of particular importance are improvements to transport infrastructure such as:

- road and rail, bus services.
- access of public rights of ways.
- access to open space for walking, cycling and equestrian.

Natural Environment:

Many comments raised issues relating to the natural environment and climate change such as:

- Access to open space and nature reserves.
- Protect the rural area and character.
- Protecting unique Fenland landscape.
- Vision should reflect climate change and impacts of rising sea levels.
- Need for more trees and re-establish hedgerows and green spaces.

Economy:

- Importance of agriculture and associated industry.
- Importance of links to Cambridge and scientific hub.

- Attract more businesses. High quality and skilled jobs

Other issues raised include:

- Preserve and enhance town centres to make them more attractive for visitors.
- Traffic free zones and pedestrian town centres.
- Fenland needs a tourist attraction.
- Support villages and thriving local communities.
- Importance of community supporting local services and facilities.
- Improving health facilities and access to health and provision for elderly care.
- Improving flood protection measures.
- Sustainable growth.
- Vision should support strategies and vision of Combined Authority.
- Better utility provision such as sewage.
- Development should only be encouraged where there is infrastructure to support it
- More affordable housing and jobs for local people.

Question 2: Housing Need

As of March 2019, the Local Housing Need figure is calculated at 550 dwellings per year for Fenland. This is, coincidentally, exactly the same as the annual figure in the adopted Local Plan 2014. Over the past five years, Fenland has delivered an average of 425 dwellings per year, so a figure of 550 is about 125 dwellings more than what we have recently achieved.

2a) This new Plan must have an end date of at least 2037. We think 2040 is about right. What do you think, and why?

Summary of issues raised

A total of 67 people responded to this question.

Almost 50% of respondents agreed with 2040 end date, 20% thought the plan period should be 2037 or lower and 30% did not specify if they agreed or not.

Generally, it was agreed that there is a need for a long term plan and that 2040 is a reasonable timescale that allows for planned growth and infrastructure to be achieved. Concerns were raised that the Plan is unlikely to be adopted by 2022 therefore an end date of 2037 would not be sufficient, therefore an additional 3 years allows flexibility.

Some comments suggest that Local Plans must align across Cambridgeshire as they are based on shared evidence. A 21 year period allows for a long term view and enables links with other infrastructure providers, such as water and health.

The following concerns were raised:

- Twenty years is too long and much will change.
- Too many uncertainties such as climate change.
- The Plan will become out of date sooner.
- The Plan target should only be 10 years.
- Need for regular review.
- A shorter period is required but the Plan might include strategic sites that go beyond the plan period due to required lead in times.
- 2040 is highly ambitious, plan needs to have flexibility.

2b) Government policy says our minimum housing target should be 11,550 new homes, to 2040. To attempt to go lower would highly likely breach national policy, but we could go higher. Should we? If so, why?

Summary of issues raised

A total of 70 comments were received for this question - of which 37% of respondents stated the need for a higher target, 50% agreed with the use of standard methodology or that the target should not be increased and 3% thought the target should be lower (10% of respondents did not specify).

Standard Method – The following summaries why a higher target would not be supported

- Existing Local Plan target is already too high;
- Have not met existing target in the last 15 years, will not achieve 550 per year;
- Plan target cannot be higher because of flood constraints in the area;
- Should not go higher as we don't have the infrastructure to support increased population;
- Additional growth cannot be supported unless infrastructure is improved;
- A higher target would be harmful to the environment and place a burden on infrastructure;
- The Local Transport Plan does not plan for a higher number;
- Do not have the jobs to support an increase in population;
- Should not be building more homes where new residents can't access basic services and facilities without access to a car.

However, some respondents who agreed with the use of the standard method acknowledge that it may be necessary for the plan to include a buffer to ensure that housing requirements can be met.

Some comments highlighted the need for a balance between a higher housing target and pressure on local infrastructure. Several of the respondents who support a higher target stated that higher growth would only be acceptable if sufficient infrastructure is provided particularly improved transport links and if additional jobs are created. Evidence would be required to demonstrate that all housing could be accommodated within areas of low risk of flooding.

Higher growth target – the following summaries the main justifications for a higher target:

- National Policy states that the standard method is a minimum target and therefore a higher target should be applied;
- A higher target will allow for more employment growth;
- A higher target will help deliver more affordable homes;
- More growth in Fenland will help alleviate pressure in the south of Cambridgeshire;
- Many house builders think the housing figure should be higher as the standard method is not a target;
- Because of previous under delivery more growth is required to meet previous unmet need;
- Allocating more sites will help address previous issues of under delivery;
- A higher target would only be acceptable if sufficient infrastructure is in place and growth can be accommodated in areas at low risk of flooding;
- Should plan positively, a higher target will mean more flexibility over the timing of sites coming forward;
- Council must engage with neighbouring authorities to take account of any needs that cannot be met within neighbouring areas;
- All allocated sites must be deliverable;
- Housing targets should look at the economy and the Combined Authorities ambition to double the economy;
- A higher target will ensure the plan is positively prepared.

Lower target:

Two respondents thought the 11,550 target is too high and that the Council should challenge the government target. As the government target is based on a standard formula that does not take into account flood risk and climate change as well as the poor transport links in the district.

Other comments:

- Need for windfall sites to allow for delivery;
- A district wide target is unfair as some areas have achieved their share of the existing Local Plan target already;
- Number should be kept under review as calculation will change as more up to date information is published. Likely that target based on the standard method will change before the plan is adopted.

Duty to co-operate:

Both Peterborough City Council and East Cambridgeshire District Council (ECDC) confirmed that they are not in a position to accommodate any unmet need from Fenland or 'offload' any need to Fenland. ECDC would request early discussion with FDC if the plan is likely to seek anything higher than the national method to understand the implication in ECDC.

2c) We will undertake research to determine what appropriate job growth and employment land targets should be, and consult with you at the next stage on these findings. In the meantime, do you have any views on what sort of jobs we should try to facilitate, and what locations would be suitable for new employment land?

Summary of issues raised

A total of 56 comments were received in response to this question. The following issues were raised:

Type of Jobs:

- Need for manufacturing jobs;
- Importance of agricultural industry;
- Growth from IT and technology in Cambridge but this requires investment in full fibre;
- Light industry and agritech;
- Need for higher skilled and value jobs and improved education;
- Fenland needs more jobs for low skills and qualifications.

Location of Jobs

- All villages need provision for light industry;
- Focus employment growth around established employment areas;
- Focus on market towns;
- Make most of links to Cambridge - Chatteris is 20 miles from Cambridge
- Allow for more home working;
- Make use of brownfield sites first.

Other Comments

- Need for better transport links to attract more business and employees;
- High Speed broadband;
- Jobs and housing targets should be aligned;
- Need for more higher skilled jobs for school leavers, who can't afford to move or travel to places like Cambridge;
- Jobs in tourism have been ignored;

- Must take into account Combined Authorities' ambition to tackle economic inequalities across the district.

Question 3: Settlement Hierarchy

A settlement hierarchy ranks towns and villages according to their size, range of services and facilities. The purpose of the hierarchy is to guide decision-making about the scale and location of new development and provision of new services and facilities, helping to achieve more sustainable communities.

Page 12 of the Issues and Options consultation document shows the settlement hierarchy identified in the adopted Local Plan.

3a) Do you agree or disagree that we should have a settlement hierarchy policy?

Summary of issues raised

A total of 75 comments were received for this question with 73% of respondents supporting the need for a settlement hierarchy policy, the main reasons for the support are summarised as:

- Ensure development is located in most sustainable locations.
- It is essential that villages know where they stand and communities protected and planning applications can be dealt with more efficiently.
- Policy has the benefit of assisting in prioritising infrastructure improvements.
- Helps protect the natural beauty of the district.
- A good and fair approach to categorising villages.

However, the following concerns were raised:

- Approach does not take into consideration that there are differences with settlements within the same category. Individual circumstances should be considered.
- Need for a flexible approach to allow infill development in small villages.
- Disagree as number of homes should be based on a number of criteria such as road infrastructure and range of shops. This broad brush approach is not sympathetic to the different places.
- Should not be used as a blanket approach to stop development.
- Policy approach is too restrictive and prescriptive.

3b) What are your views on the existing settlement hierarchy? Should there be different categories?

Summary of issues raised

Of the 66 comments received for this question, the majority support the existing settlement hierarchy as it is a logical approach to guide growth.

The following summarises the main issues raised:

- Not clear what existing hierarchy is based on.
- Hierarchy should not be based on population, but on local business and employment and schools
- Hierarchy should be used as a guide to assist the growth strategy and location and should not be the sole determining factor.
- Needs to be more flexible and planning decisions made on a case by case basis.
- Must take into account the suitability of land for development especially flood risk.
- Direct proportionate settlement growth is not appropriate and will force villages to expand beyond their means.
- Concerns that settlements will become dormitory towns.
- No categories, growth should be placed in most suitable locations.

The following sets out suggested changes to categories:

- Hierarchy should be extended to include more villages.
- Limited number of categories fails to recognise the different circumstances of all settlements.
- Too many categories; should be simplified.
- Category for linked settlements, as Growth in a smaller village could support larger villages.
- Growth should be allowed in smaller hamlets not included in the hierarchy, settlements on good transport links could support infill development.

3c) Should any villages be moved up or down the hierarchy? If so, which ones and why?

Summary of issues raised

A total of 55 people responded to this question.

There is general agreement that there is a need for the hierarchy to be reviewed. Several responded stated that this must be based on an agreed methodology that looks at a wide number of issues, not just population.

The following settlements were suggested to be moved up the hierarchy:

- Murrow
- Guyhirn – good links to A47
- Leverington – close to Wisbech
- Benwick – as not far from market towns and larger villages with a wide range of facilities
- Tydd St Giles
- Rings End – could support more growth and is close to A47
- Coldham
- Newton on the Isle
- Manea – railway station
- Leverington
- Coates
- Eastrea
- Gorefield

The following settlements were suggested to be moved down the hierarchy:

- Tydd St Giles – as it an isolated settlement;
- Chatteris – smaller and less services than other market towns;
- Benwick - due to impacts from growth in nearby large villages;
- Tydd Gote should be a larger village as part of settlement is located in South Holland.

Other issues:

- Policy should be flexible and allow for infill development in small villages and hamlets not identified in hierarchy.
- Need for a new category for Chatteris and Whittlesey between Market Town and Growth Village.
- Concerns as most growth villages are located to the south of the district.
- Settlements with railway stations should be higher up the list.
- Need for more stringent requirements for small villages.
- New category for villages such a Wisbech St Mary, Parson Drove, Manea, Gorefield and Wimblington;
- All small villages should be moved up the hierarchy to support future growth.

Question 4: Settlement Boundaries

Settlement boundaries are used to define the edge of a town or village. The primary purposes of settlement boundaries are to prevent the spread of development into the countryside, to maintain the character of each settlement, and control the growth within and outside each settlement in accordance with the settlement hierarchy.

4a) Would you support the re-introduction of settlement boundaries?

Summary of issues raised

A total of 78 responses were received for this question with strong support (77%) for the re-introduction of settlement boundaries. However, as noted in response to question 4b below, there is support for a flexible approach to settlement boundaries.

The following issues were raised in support for settlement boundaries:

- prevent urban sprawl.
- protect open space and the countryside.
- provides more clarity and certainty for landowners, developers, local communities and the Council.
- Current policy is too subjective and results in inconsistent decision making.
- But sufficient land must be allocated to support the growth targets.
- Should not have been removed in 2014 Local Plan.
- Will make it easier to deliver rural exception sites.

Approximately 20% of respondents do not support the re-introduction of settlement boundaries, the following issues were raised:

- Settlement boundaries are not in accordance with the NPPF.
- An overly restrictive approach could result in a plan that is not positively prepared or effective.
- Arbitrary lines drawn on a map which unnecessarily restrict development.
- Too restrictive and inflexible.
- Need for a more holistic approach based on principals of sustainable development;
- Limit amount of sustainable development.
- Although the current Local Plan policy is too ambiguous which results in uncertainty. Rather than re-introducing restrict policies like settlement boundaries the policy should clarify where development should go this will still allow for flexibility.
- Only allowing development in the settlement boundary results in over development and loss of open space and loss of character of the village.
- Need for a criteria based policy rather than restrict boundaries.

Please note that two respondents (3%) did not specify which approach they preferred.

4b) If the Plan includes settlement boundaries, should the supporting policy result in:

i) a hard boundary with strict policies that limit development outside of the boundary?

or

ii) a flexible policy that could allow development which adjoins the settlement boundary, provided a number of sustainability criteria are met?

Summary of issues raised

For this question, 66 comments were received.

As summarised below the majority of respondents favour a policy that allows for a flexible approach. The

main issues raised are summarised as:

i) Hard Boundary - 42% support

- A hard boundary will prevent urban sprawl.
- help protect identify of villages.
- will remove any uncertainty.
- Support for a hard boundary but with limited flexibility, e.g. rural exception sites.
- Concerns raised that a more flexible approach will result in confusion and uncertainty.

ii) A flexible policy - 55% support

- Will allow for sustainable development in accordance with the NPPF and a positively prepared plan.
- But the policy must include clear criteria.
- Criteria should include:
 - ❖ Accessibility to sustainable transport;
 - ❖ Flood risk;
 - ❖ Access to health care facilities;
 - ❖ Sustainability criteria.
- Decisions should be based on a case by case basis taking into account need for sustainable development.
- Allows for development on the edge of settlements (See Huntingdonshire District Council's recently adopted Local Plan).
- This approach will future proof the Plan and allow for unforeseen opportunities.

(Please note that 3% of respondents to this question did not specify which approach they preferred).

4c) If the Plan is to include settlement boundaries, how should we go about determining where they go? You may even want to send us a map of where you think the boundary should go, for any settlement you have an interest in.

Summary of issues raised

A total of 59 comments were received for this question. One of the main issues raised by many of the respondents is that any decision on settlement boundaries must be based on consultation with local residents and Parish Councils as they know the local area best.

The following provides a summary of other issues raised:

- Any boundary must take into consideration the need to meet the districts housing requirements and any allocated sites.
- Must be based on site visits and reflect the reality of the settlement.
- Must maintain the character of the settlements and settlement pattern.
- Must prevent the erosion of the countryside and the coalescence of villages.
- Must take into consideration flood risk.
- Must be tightly drawn.
- Should not be too tightly drawn.
- Should help to protect areas of open space.

The following suggestions could be used to define the boundary:

- Could set buffers around each settlement based on position in hierarchy;
- Use the last house in each road as the edge of village;
- Use main roads and by passes to define limits;

- Should be based on existing continuous built form of village;
- Use original boundaries from 1993 Local Plan. Defined by natural boundaries, junctions or green corridors between villages

Question 5: Growth Options

Once the Local Plan growth targets for homes and jobs have been identified it is then important to establish how this proposed growth should be distributed across the district. The Issues & Options Consultation Document (Section 3 pages 15 and 16) explores six options for how growth could be distributed. Please look at these different options before answering question 5.

5a) Which option/s do you prefer?

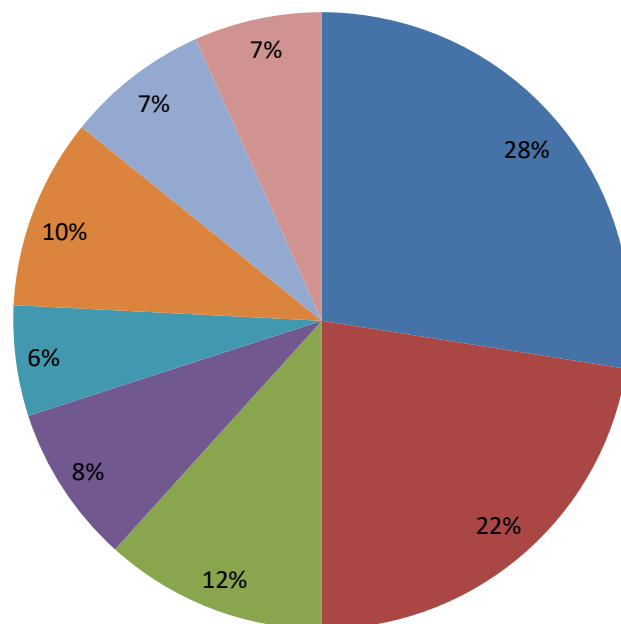
Summary of issues raised

This question asked respondents to select their preferred growth option based on the six following alternative options:

- Option 1: Proportionate Settlement Growth
- Option 2: Market Towns Led Growth
- Option 3: Strategic Growth at One or More Settlements
- Option 4: New Settlement(s)
- Option 5: Small Site Focus
- Option 5: Corridor Growth

Respondents could select more than one option. For this question 81 people responded. The following graph shows the approximate response for each option with Options 1 (Proportionate Growth) and Option 2 (Market Towns Led Growth) receiving the highest level of support.

■ Option 1 ■ Option 2 ■ Option 3 ■ Option 4 ■ Option 5 ■ Option 6 ■ None ■ Mixed approach



Several responded did not select a specific option but stated that the most sustainable option is likely to

require a mixed approach.

The following additional comments were received:

- Growth should be directed towards the most suitable settlement first.
- Growth should be directed to settlements with good public transport links.
- Support for more growth in growth villages.
- Growth should be located towards areas at lowest levels of flood risk.
- Growth should be supported by proportionate jobs growth.
- Assessment of options must be based on the Sustainability Appraisal.

5b) What are the positive and negatives of the option/s?

Summary of issues raised

The following table summarises some of the positive and negative effects of each option as identified by respondents.

	Positives	Negatives
Option 1	<ul style="list-style-type: none"> • Much needed investment in towns • Fairness to level of growth in villages • Enables development in all areas and ensure economic benefits 	<ul style="list-style-type: none"> • Larger settlements are constrained by flood risk • Decline of high streets in market towns means they may not be as suitable to support growth • Impossible to implement as populations change
Option 2	<ul style="list-style-type: none"> • Puts the housing where the jobs and travel is already available • Will focus development in most sustainable locations • Limiting growth in villages will protect the character • Even spread of growth • Makes better use of existing facilities 	<ul style="list-style-type: none"> • Not all market towns are the same and some lack facilities to support additional growth • Leaves villages too stagnate and towns become too large
Option 3	<ul style="list-style-type: none"> • Could enhance towns 	<ul style="list-style-type: none"> • May not meet growth targets • Negative impacts on other towns
Option 4	<ul style="list-style-type: none"> • Will not have to cram into existing settlements • Allow for strategic planning for services and facilities • Planned new settlements will provide services and facilities and improved public transport 	<ul style="list-style-type: none"> • Challenge to find suitable sites • Increase in traffic • Must avoid area at flood risk • Issues of deliverability and agreement with landowners and land assembly • Loss of agricultural land – concerns relating to Brexit • Unrealistic in Fenland
Option 5	<ul style="list-style-type: none"> • Smaller sites are quicker and easier to deliver creates more diversity in the housing market • Only as part of a mixed approach with other options 	<ul style="list-style-type: none"> • Only provides a short term solution • Creates piecemeal development • Small scale development will place a bigger burden of facilities • Blurring village identity
Option 6	<ul style="list-style-type: none"> • Could help improve public transport • More sustainable option • Improved transport network will help connect secondary settlements 	<ul style="list-style-type: none"> • Will only lead to increased congestion on already busy roads • Road system not suitable to support this

Additional comments received:

- One option cannot be delivered in isolation.
- The growth option must be based on evidence and availability of land.
- Several comments highlighted the point that the best approach will be a mix of options resulting in the most benefits and, most sustainable development.

5c) Which option/s do you dislike and why?

Summary of issues raised

A total of 56 people provided comments about which option they disliked. Although the results of question 5a show that Option 1 was the most popular approach it is also recognised as the least favourite approach with the following concerns raised:

Option 1

- Would result in too much growth in villages again.
- Not just about existing size of settlements, needs to also look at capacity for growth.
- Largest settlements may not have sufficient facilities to support growth.
- May not have facilities to support growth.
- Other constraints may limit level of growth.
- Less sustainable developments in smaller rural settlements.

The following issues were raised with the other options:

Option 3:

- Too restrictive.

Option 4:

- Significant extra cost associated with providing all services and transport links.
- Loss of agricultural land.
- Difficult to integrate new communities.
- Very long lead in times.
- Flood risk issues limits opportunity to identify suitable sites.

Option 5:

- Will result in unco-ordinated development.
- More development in villages.
- Might not meet housing targets.
- More expensive to deliver smaller sites as does not provide quantum of housing.

Option 6:

- This approach would not work, more beneficial to place development near existing facilities.
- Development in less sustainable locations with limited local services and facilities.

5d) Are there alternative options which should be considered?

Summary of issues raised

Of the 24 respondents to this question, the vast majority stated no alternative options should be considered. Several responded repeated comments made for question 5a that a mixed approach should be considered, taking into account sustainability criteria and the availability of sites.

Question 6: Settlement Policies

The current Fenland Local Plan includes a section which sets out specific policies and requirements for each of the market towns. This includes a brief description of the town and a key diagram that highlights areas for growth. However, there are alternative options, as set out in the following question.

6a) Should the Plan include:

Option 1. Bespoke policies for each market town only?;

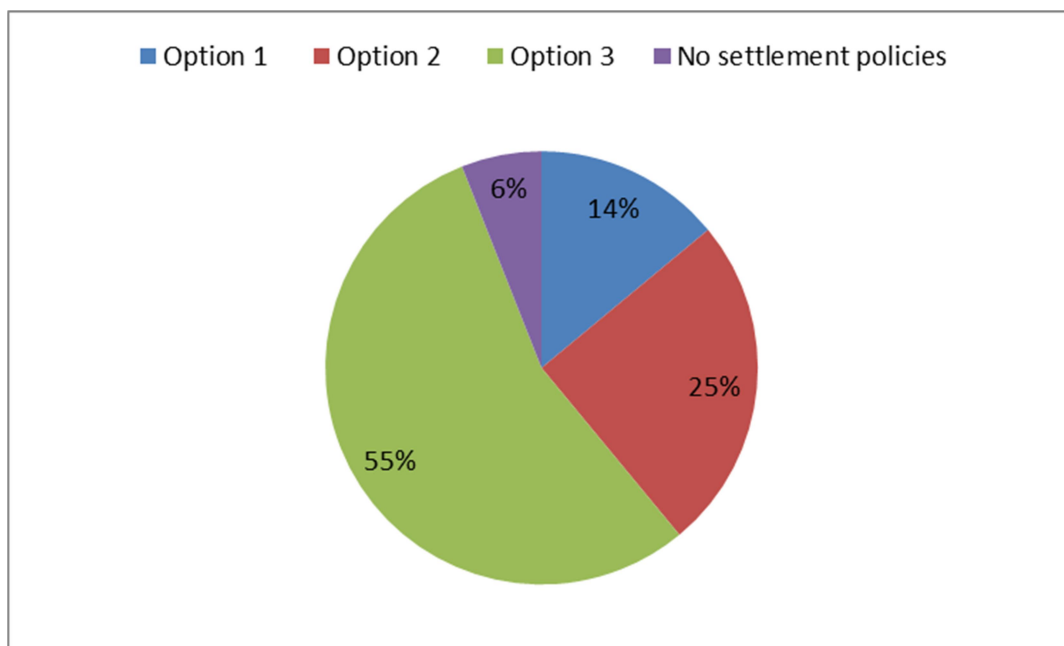
Option 2. Bespoke policies for each market town and other higher-order settlements, such as large villages?; or

Option 3. Bespoke policies for all settlements in the settlement hierarchy?

Summary of issues raised

This question set out three options for the Plan to include specific policies for settlements. A total of 69 people responded to this question, with the majority (55%) stating that they preferred Option 3 – bespoke policies for all settlements in the settlement hierarchy, with good support from local communities.

The breakdown of responses is shown in the following graph:



The following comments were received for each option:

Option 1:

- Policies should focus on Market Towns only as they are in need of regeneration.

Option 2:

- This option will support a sustainable growth strategy. Small settlements with limited growth can be supported by criteria based policies.
- This approach will allow for sufficient detail to support growth settlements whilst avoiding an overly detailed plan.
- No need for detail for all settlements.
- Policy linked to allocations that sets out delivery requirements, therefore no need for policies in smaller

settlements.

Option 3

- Good support from local community.
- All settlements have different characteristics and needs which should be individually addressed;
- 1993 Plan included individual settlement policies.
- Several responded highlighting the importance of communities being fully involved in the process of writing settlement policies as they know the areas best.
- Acknowledgement that this option will make more work and a longer plan, but cannot plan for unique needs with generic policies and general percentages.

A few respondents did not support the need for specific policies for settlements as it was felt to be unnecessary. Policies should be more generic to enable a succinct and useable document.

Question 7: Health and Wellbeing

The government's health profile for Fenland shows that life expectancy, obesity and physical activity are all significantly worse than the England average. It is an objective of the Council to turn that around and promote health and wellbeing for all.

7a) Do you think the new Local Plan should include specific policies about health and wellbeing?

Summary of issues raised

There were 74 respondents to this question with overall significant support for such policies.

Reasons for **supporting** specific policies included:

- Need to reduce health inequalities and achieve healthy communities.
- Need to align with the Cambridgeshire and Peterborough Joint Health and Well Being strategy and the Cambridgeshire and Peterborough Director of Public Health's Annual report.
- Should also adopt NHS and police policy standards for new developments.
- Need to align with the NPPF.
- Need more access to health clinics, doctors surgeries and medical advice, generally.
- Provision of high quality open space in new developments needed, not just small areas of open space.
- Evidence is widely available that access to high quality open space close to where people live can significantly improve people's physical and mental health and wellbeing.
- Could be achieved by encouraging/providing access to green spaces and natural green spaces, better cycling infrastructure and the provision of specific parks and nature reserves that will allow people to explore the outdoors with regular exercise and fresh air.
- Improved Rights of Way network and access to countryside for all non-car modes is important. Need to also include horse riders as Fenland has a high equestrian population with impacts on both health and the economy.
- Cultural facilities such as theatres and cinemas along with other community and social facilities can play important role in supporting health and wellbeing as they provide opportunities for people to come together and participate, improving cultural wellbeing.
- New properties need to be suitable for an aging population and have minimum space standards.
- Joined up approach in dealing with other issues is needed.
- Need to be proactive and preventative as in long run will reduce health care and other costs.

Those who **opposed** inclusion of specific policies cited:

- Should not deal with lifestyle choices e.g. obesity.
- This is an education issue, not a planning one.
- These are central Government and County Council issues.
- Prosperity and higher aspirations will be the most effective way of improving health.

A number of respondents explained that whilst health and wellbeing policies were important it would depend on the specifics about what was included in the plan i.e. where relevant and sustainable and provided they could be met.

7b) Do you think the Local Plan should include a policy to restrict the amount, or location of, hot food takeaways?

Summary of issues raised

There were 57 respondents to this question with 49% supporting restrictions, 44% against and 4% uncertain.

Those **supporting** restrictions highlighted:

- There are already too many.
- High levels of fat, sugar and salt in many takeaways have a negative impact on health (obesity, cardiovascular disease, type 2 diabetes, stroke and some cancers).
- Concerns about antisocial behaviour (litter, noise pollution, illegal parking), creation of additional traffic and congestion and on the retail character and economic health of town centres;
- Poor diet impacts on obesity levels.
- Have a negative impact on children's diets and eating behaviour, as significant health problems related to obesity start to develop at primary school age and behaviours established in early life follow into adulthood.
- Local Plan should be proactive to reducing outlets (or at the very minimum ensure additional outlets are prevented) and ensure that such outlets are not located near schools/colleges;
- Other local authorities' Local Plans and SPDs have specific policies to control hot food takeaway outlets.
- Policies should not restrict all takeaways but prevent them near schools, and prevent an over-dominance of outlets in certain locations e.g. areas of distinct multiple deprivation - also no new licensing approvals for tobacco or alcohol sales in those areas.
- Should be an active encouragement of businesses that promote a healthy lifestyle.

Those **opposing** restrictions highlighted:

- Market forces should be allowed to work.
- Should demonstrate good practice and the 'wrong retail' will regulate itself because demand will fall
- Do not need a nanny state.
- Positive encouragement of healthy lifestyles and education is more important, making exercise and outdoor activity a preference.
- Not all hot food takeaways are unhealthy e.g. Wagamama.
- Given that a significant number of hot food takeaways are now delivered rather than collected such a policy has very limited value.
- Hot food takeaways are not the issue, it is the rest of the lifestyle choice or habits;
- Why pick on them, what about off-licenses etc.
- Such a proposal would be contrary to the NPPF and is unsupported by any evidence published to date. Should the council feel such a policy is required a full evidence base is required. Such an evidence base is not available.

Comments were also made that the choice could be between hot food takeaways or empty shops which

was too late now to reverse and that ultimately it is down to individuals as to what or where they eat - if somebody fancies a curry or burger they will go and buy one and drive if necessary to obtain it.

7c) Do you agree or disagree that developers of large schemes should submit a Health Impact Assessment to show how the new development will help achieve healthy and safe communities?

Summary of issues raised

There were 71 respondents to this question with around 50 (about 70%) agreeing with the provision of Health Impact Assessments (HIAs) for large schemes.

Of those in **agreement** the following comments were raised:

- Other Cambridgeshire Councils have policies requiring HIAs.
- HIAs include considerations of the differential impacts on different groups in the population, as certain groups are potentially more vulnerable to negative impacts from development such as those on a low income, people involved in the criminal justice system, minority ethnic groups, young, disabled (physically and learning) and elderly people.
- Large developments have the capacity to incorporate features to achieve healthy and safe communities.
- Could be a suitable mechanism to help new large developments achieve better than 'business as usual' outcomes.
- Developers, particularly of larger housing schemes, are the root cause of many problems amongst communities. People become trapped in low cost housing estates with few community facilities and poor access to green open spaces. Leads to low aspirations resulting in poor health, reduced life expectancy and an increase in crime.
- Should always be a consideration for all developers - why would anyone build or allow to be built, any community that would be detrimental to community or residents' health and safety.
- Would bring an element of accountability.
- Would like to see more consideration of walking and cycling routes as well as assessing the mental health impacts of the environment.
- Should go beyond health e.g. impact on roads, rail NHS etc. as well as energy efficiency, sustainability of site practice and the resulting dwellings.
- Should link back to the environmental quality of the development including provision of more, larger, and better areas of wildlife-rich natural greenspace.

Whilst agreeing with HIAs in principle there were differences of opinion about when they should be required for large schemes ranging between 250+, 500+ and over 1,000 dwellings.

Concerns was also expressed that there is a danger that HIAs are simply a tick box exercise which adds cost to the development process. In addition, any policy should have a clear position in terms of how the planning system can support and be reasonable in its requirements with any improvements being funded through S106 contributions.

Those **disagreeing** with HIAs highlighted the following:

- In preparing the Local Plan the Council should have considered the health impacts with regard to the level and location of development. Policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area. If they do not then that is a failure of the plan not the development. The Council should be using the plan to reduce the amount of documentation required not adding to it.
- HIAs have little impact on decision making.
- It is for central government to set via Building Regs minimum standards - additional local control is

unnecessary.

- People should be educated to care for their health.
- Developers will be able to write anything to make their scheme look good. How will it be assessed or upheld?

Question 8: Renewable Energy

In preparing this new Local Plan we intend to provide a wide-ranging set of policies which will demonstrate Fenland's leadership in tackling and adapting to climate change.

National policy says Local Plans should help increase the use and supply of renewable and low carbon energy and heat.

8a) Should the Local Plan require (rather than just encourage) developers to incorporate renewable energy generation?

Summary of issues raised

A total of 71 responses were received in relation to question 8a.

While the response to this question was mixed, overall there was support, with many respondents simply stating 'yes'.

It was suggested that low carbon energy generation should also be considered, rather than focusing wholly on renewable energy, and that a holistic approach to the specific needs of each development should be taken. It was also suggested that any requirement/s should not be overly prescriptive in terms of type of energy or location (on-site or off-site), to allow for differing circumstances, and to be flexible to future technological advances.

Several responses suggested that renewable energy generation requirements should be dealt with through building regulations, rather than planning policy.

Some concern was expressed about the potential impact of such requirement on viability.

A couple of comments expressed concern about grid connection and network capacity, stating that developers have previously had to refrain from incorporating renewable energy generation due to capacity issues, and that connection to suitable grid infrastructure from the development can have detrimental impacts.

8b) Should the Local Plan allocate specific areas in Fenland where commercial windfarms would, in principle, be suitable?

Summary of issues raised

Question 8b received a total of 57 responses.

Opinions in relation to this question were very mixed, with some notable support for allocating specific areas for commercial windfarms, but also many respondents opposing the idea.

Several respondents suggested that areas should be identified for solar power as well as wind, and a couple of respondents expressed support for other power sources, including tidal (from the Nene) and heat pumps.

Other key comments included:

- Support for allocation of areas if rural and important views are not obstructed; if natural green spaces are not adversely impacted; if not near homes.
- More research into windfarms is needed, particularly into viability.
- Support for wind farm development but through case by case consideration rather than allocating areas.
- Support for allocation of areas, but additional development sites should be considered on a case by case basis.
- Offshore wind power is cheaper – land should be used to build houses instead.

8c) Are there any opportunities to co-locate new development with existing or new renewable/low carbon energy supply systems?

Summary of issues raised

A total of 35 comments were received in response to question 8c.

The response to this question was again mixed, with many respondents simply stating 'yes' or 'no'. Several respondents said 'don't know'.

The more detailed responses included:

- One opportunity is the river Nene as a source of energy generation. It is a tidal river with strong currents in and out due to its narrow width. Bank mounted turbines fed by offcuts would provide an endless supply of electricity without encroaching on river traffic.
- There could be areas allocated for low carbon/highly sustainable housing where normal housing wouldn't normally be acceptable. A bit like affordable housing exception sites, but strict rules and control would be needed.
- Manufacturing frequently wastes heat and power - brickworks, food processing, and industrial areas could support each other.
- UK-based company MVV Environment Ltd recently announced plans for a new energy from waste combined heat and power facility generating electricity and steam on land at Algores Way, Wisbech. The proposed energy from waste combined heat and power facility will divert over half a million tonnes of non-recyclable waste from landfill every year, generating over 50 megawatts of electricity and offering the opportunity to supply heat and power to existing and new local factories. The location of the facility provides an excellent opportunity for the council to direct future developments with high energy demands to south Wisbech, on land currently allocated for growth and deliver on key sustainable development criteria set out in the National Planning Policy Framework.
- Solar panels on all new roofing and on farm buildings.

Question 9: Energy Efficiency

Local Plans can set energy performance (or energy efficiency) standards for new housing that are higher than the Building Regulations, up to a set level.

9a) Should the Local Plan require developers to go beyond basic Building Regulation minimum standards, and build homes and other buildings with greater energy efficiency?

Summary of issues raised

A total of 67 responses were received for question 9.

The majority of respondents expressed support for going beyond basic Building Regulations in regard to energy efficiency, however the majority was not overwhelming, and many other respondents objected to the option. The reasons cited for objection were:

- Building Regulations are taking the lead on this issue and requiring houses to be more energy efficient. The Government's current consultation '*The Future Homes Standard: Changes to Part L and Part F of the Building Regulations for New Dwellings*' proposes a significant increase in the energy requirements for new homes in 2020 and the Future Home Standard being introduced by 2025.
- The key to success is standardisation and avoidance of every authority in the country specifying its own approach to energy efficiency which would mitigate against economies of scale for both product manufacturers, suppliers, and developers.
- Would not take into account the viability on a site-by-site basis. Going above the minimum standards would entail additional work and costings. This departs from the Government's intentions to improve the efficiency of the planning system and reduce the burden on house builders, as set out in the 2015 Ministerial Statement.
- Can impact upon the affordability of such homes. Any policy relating to energy-efficient standards should be worded in such a way as to allow flexibility.
- People should be encouraged to improve the efficiency of older housing which is where most carbon emissions occur in housing.
- A rigid requirement is likely to have a negative impact on housing delivery due to viability;
- The playing field should be level between Fenland and other districts to ensure there is not a commercial disadvantage to developing in Fenland.
- Requiring higher than Building Regulations standards will reduce quality;
- Need to consider implications for running costs.
- Low land values in Fenland would cause viability issues.

Supporting/ general comments made included:

- Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. In developing policy covering this area you may find the Historic England guidance 'Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historically and traditionally constructed buildings' to be helpful in understanding these special considerations;
- Would assist in addressing fuel poverty and associated health impacts;
- Greater energy efficiency is needed- there is a climate emergency.

Question 10: Facilitating Low Carbon Future

It is likely our future energy demands will be met by electricity generated from low carbon sources (e.g. renewable or nuclear energy). This means gas in homes and petrol/diesel in cars will likely become a thing of the past, quite possibly before the end date of this new Local Plan (2040).

There is currently no requirement for electric car charging points; national policy only says to enable them in the future. Therefore, it is up to local policies to determine if this should become a local requirement or not. However, government is currently consulting on changes to Building Regulations which could mean in the future all new homes must have electric charging points.

10a) Should the Local Plan ensure buildings are designed to minimise energy use, by taking in to account layout, building orientation and landscaping?

Summary of issues raised

A total of 64 comments were received for question 10a).

There was very strong support for designing buildings to minimise energy use by taking into account layout, orientation and landscaping.

Supportive comments included:

- This is common sense that good designers would naturally take into account.
- These design measures are currently used and should be encouraged.
- There is a need to move away from being rooted in traditional building methods and design. Need to embrace everything that is quicker to build, smarter, more energy efficient and with minimal maintenance.
- Need to do all we can to minimise energy use in light of the climate challenges faced;
- Would help address the health impacts of fuel poverty.

However, some consultees expressed concern about such a policy being included in the Local Plan.

Concerns raised include:

- These suggested policies are likely to significantly increase build costs and therefore adversely impact on what is already a fragile development viability position. Policy requirements should be encouraged rather than rigidly required.
- Not easy to achieve in an urban setting.
- The move for higher density land use restricts opportunity.
- Should be an element of flexibility built into this policy, recognising that site constraints can have a significant influence on how a site is designed.
- Local authority planning services are often not trained to assess these issues.
- Can often result in a form and design of development that is not sympathetic to the local context.
- Should be done through the Building Regulations.
- Building regulations already set a minimum standard for energy efficiency.

10b) Should the Local Plan encourage or require large scale proposals to increase the use and supply of low carbon energy and heat infrastructure to new homes and buildings?

Summary of issues raised

A total of 65 comments were received for question 10b).

There was a mixed response to this question, with some arguing for 'encourage' and other for 'require'. Several respondents simply stated 'yes' as their response, and did not clarify whether they think the Local Plan should *encourage* large scale proposals to increase the use and supply of such energy and infrastructure, or whether it should *require* it.

The more detailed comments made included:

- Should be dealt with by Building Regulations.
- Doing nothing would be regressive.
- Should be encouraged as a minimum: need to assess impact on affordability and deliverability to determine if it could be a requirement.
- Policy encouraging or requiring such measures would help to address the impacts of fuel poverty.
- Yes, and energy should be sourced locally.
- Not if existing green infrastructure would be adversely impacted;
- Depends entirely on location.

- Not practical at present.
- Should be applied on a site by site basis in order to take into account site viability, technical feasibility and network capacity.

10c) Should the Local Plan require all new development to put in place electric vehicle charging points?

Summary of issues raised

A total of 64 comments were received for question 10c).

Overall there was support for requiring electric vehicle charging points.

Comments in support of the idea included:

- Yes- small change but large impacts.
- Provision should also be made for shared parking areas (not just parking in the immediate curtilage of dwellings).
- Suggestion that policy requires that the necessary wiring be put in place but capped off so people can easily install a charging point if needed, and at their own expense, resulting in minimal cost to the developer.
- With the range of different producers of electric vehicles it would be more appropriate for developments to be required to install the infrastructure to facilitate the provision of electric vehicle charging, rather than providing the charging points.

Some comments expressed reservations over the idea, or opposition, including:

- It is important to ensure that these remain as policy aspirations rather than prescriptive requirements as this will have an impact on viability of development schemes.
- Would result in waste- people can install them if needed.
- Requirement should not be introduced locally, should be nationally introduced.
- It is early days for electric cars. The current batteries are going to be a huge problem for councils everywhere when they need replacing.
- Demand should be market driven.
- Should be considered on a case by case basis.
- Disagree with the idea of introducing a policy which requires car charging facilities on every new build property. Whilst accepted that hybrid and electric cars will predominate in the near future, the use of home charging may become relatively obsolete as induction charging becomes more widely available. Whether this is at home or at work or on public roads it is difficult to predict, but in Europe there are already some roads so equipped. This technology is rapidly evolving. One solution is to provide charging points as an option on homes or just provide an external power socket next to the drive.

There was confusion over National legislation regarding this matter.

10d) Should the Local Plan require new development to be entirely electric based (i.e. not connected to the gas network), thereby future proofing the development to how homes and businesses will be powered in the future?

Summary of issues raised

A total of 58 comments were received for question 10d).

Overall, respondents felt that new development should not be entirely electric based, though there was some support for the idea.

The objections and concerns raised were:

- There is no proof of ability to produce enough capacity;
- Should be decided on case by case basis;
- If the electricity supply fails (a particular concern for more rural areas) gas and oil provide heating and cooking options;
- Consideration should be given with regards to the cost to any future residents of electric based developments to ensure affordability and reduction of health inequalities and fuel poverty;
- Will have an impact on viability of development schemes- any policy should be flexible;
- It is not proven that the technology is available to support this aspiration;
- May put Fenland at a competitive disadvantage if not required nationally - national policy should precede;
- It is too early to have this requirement in the plan –not sure whether we have the electricity available for the widescale development of all-electric properties;
- Electricity is a dearer alternative to gas, so this needs to be addressed before demanding all-electric housing;
- When gas is prohibited, air source heat exchanges can be installed outside and connected into existing home radiator system.

Comments in support of such a policy requirement included:

- Reduced emissions and cleaner air;
- Can help reduce local exposure to air pollution generated by combustions sources for central heating, gas and wood burning stoves, open fires etc.

Question 11: Minimise Carbon Losses from Wider Activities

Whilst using gas, petrol and diesel to power our homes and cars is an obvious contributor to greenhouse emissions and climate change, there are other less obvious activities which can result in high levels of greenhouse emissions. In Fenland, the biggest contributor is through the farming of peat soils.

Should the Local Plan:

11a) Set out a specific policy on the loss of peat-based soils, and the carbon impacts of it?

Summary of issues raised

Question 11a) received a total of 53 responses.

There was a very mixed response to this question.

Natural England provided a detailed response supporting the principle of such a policy. Its response stated:

"... the Local Plan should include a specific soils policy which includes recognition that the Plan area includes a significant proportion of East Anglia's lowland peat soil resource. The policy should reflect the importance of peat soils, as a significant carbon store, in helping to mitigate against climate change, and the imminent threat to the fenland (including Cambridgeshire's) peat soils due to current land management practices, identified in Defra's 25 Year Environment Plan and the UK Peatland Strategy 2018 - 2040. ... the policy requirements should promote the sustainable use and management of peat soils, to ensure their protection and minimise production of carbon emissions through their loss and degradation. ... should ensure that relevant development contributes to the enhancement of degraded peat soils to deliver a wide range of environmental services. ... should safeguard the long term capability of best and most versatile agricultural land. ..."

It was suggested that guidance should be taken from Defra's Lowland Agricultural Peat Taskforce and the East Anglian Fens Peat Pilot, managed by Natural England, and it was emphasised that the long-term

health of soil must be considered.

One comment queried whether the Local Plan (or FDC) has the powers to regulate agriculture, with others expressing that farmers are suffering enough without having additional policies imposed. If the Local Plan could impose such policy, it was questioned how such a policy would be implemented and some respondents questioned whether such a policy approach would be viable, given Fenland is a largely arable area and it could potentially reduce food production.

11b) Require developers, as part of their contribution to open space provision, to create 'carbon sinks', such as through tree planting, creation of wet-grasslands or preservation/restoration of peat soils?

Summary of issues raised

Question 11b) received 62 responses in total.

There was strong support for this suggestion, with only few respondents objecting or expressing concern.

One response expressed support, but stressed that specialists must be consulted to advise on species etc. It was also emphasised that any areas created should be protected and have long term maintenance to ensure their long-term viability.

It was felt that such a policy would result in aesthetic benefits and help the environment.

Natural England supports such a policy requirement, stating that developers should be required to provide or contribute towards provision of sufficient area of high quality multi-functional green infrastructure to deliver the requisite range of environmental services including open space to meet people recreational and health needs, sustainable drainage, climate change mitigation, biodiversity and landscape enhancement.

It was commented that there is significant scope within Fenland to co-locate new habitat for biodiversity net gain, that also acts as a carbon sink and provides accessible natural greenspaces for existing and new residents. It was suggested that it may be more appropriate to encourage rather than require this, as different design solutions will be appropriate in different parts of the District.

Concerns/ objections raised included:

- Could open another loophole for developers.
- Could result in the use of farmland that would be best kept for agriculture.
- Such matters must remain as policy aspirations and not prescriptive requirements which would impact viability.
- Restoration of soils seems to be going too far.
- The creation of carbon sinks could be funded by central government as part of their Climate Change initiative, so that the inclusion of such infrastructure becomes the acceptable norm - no need to pass on the costs of providing such infrastructure onto the home buyer.
- Carbon sinks are a short term relief not a solution.
- There is a danger that with other requirements for land such as open space, SUDs etc., the developable area will reduce yet further and the land required to provide the many homes required will have increase significantly.
- Only on large developments.

Question 12: Other Proposals to Reduce Greenhouse Gas Emissions

The Local Plan could require developers to create new communities which directly or indirectly help minimise carbon emissions.

12a) Should the Local Plan require developers to provide allotments or other growing areas, which can help reduce damaging 'food miles'?

Summary of issues raised

A total of 64 responses were received for question 12a).

Again, the response to this question was mixed, with some in agreement and others not.

Comments in support include:

- Some allotments have waiting lists.
- Lack of gardens in modern developments would make their inclusion necessary.
- Support for allotments with facilities (e.g. toilets, community centre).
- Support for siting allotments close to/ within developments.
- Physical and mental benefits.
- Reduced food miles.
- Support for community allotments/ orchards (rather than individual plots).
- Only in the case of strategic schemes of 500 plus homes, and as part of the open space requirement of those schemes and not in addition.

Opposition to the idea included:

- People can grow things in their gardens if they desire- allotments need managing and people don't have the time.
- Will result in increased costs to developers- viability situation is already fragile in Fenland.
- Converse to the above, it was noted by many consultees that there are a lot of allotment plots in Fenland that are vacant: suggested that current usage is investigated to ascertain demand before including such a policy requirement.
- Difficult to see how developers could do this, unless they acquired land for allotments additional to that which they intended to develop. Such acquisitions might inflate the cost of agricultural land.
- Developers should not be required to provide these on site. If required contributions via CIL could be used.

12b) Should the Local Plan make provision of cycle and footways, which are designed in a way so that they become the natural choice to use for short journeys, rather than the car?

Summary of issues raised

A total of 68 responses were received in relation to question 12b).

There was strong support for inclusion of such a policy. Reasons cited included:

- Resultant health benefits.
- Roads currently too narrow to cycle in comfort.
- Benefits in terms of air quality and climate change.

Concerns raised included:

- Footways are not maintained properly now- unless these are going to be maintained, no point in building them in the first place.
- Must be well-lit and lots of security from anti-social behaviour.
- Might work in towns, but for many village residents, there are no short journeys.
- Not at the detriment of other transport (cars/buses). People prefer motorised transport due to time issues not addressed by this provision.
- Not at the expense of sensible sized roads.

Other general points made included:

- In many cases the roads in Fenland are quiet enough to cycle on without issue, so only in cases where are needed, and where those roads connect realistic distances.
- Cycle and footways should be separate and not shared, especially in urban areas where there is likely to be heavy usage of both.
- Should be incorporated before any work starts.

Question 13: Design and Amenity

Good design can help create attractive places and spaces for people to live, work and visit and can contribute to the creation of healthy and sustainable places. Design is not only about appearance, it is also about how places function.

Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.

13a) Do you think the new Plan should include a strategic design policy for the district?

Summary of issues raised

There were 70 responses to this question with around two-thirds supporting a strategic design policy.

Those **supporting** such a policy raised the following points:

- There are too many poorly designed houses being built.
- Will help create attractive places, buildings and spaces for people to live, work and visit that look good, last well, and will adapt to the needs of future generations.
- Design is not only about appearance, it is also about how places function.
- Can contribute to the creation of healthy and sustainable places.
- Should deliver good quality design as part of making the area (with the rest of Cambridgeshire and Peterborough) a world leading place to live, work and learn.
- Should promote Natural Cambridgeshire's Developing with Nature Toolkit to provide sufficient areas of high quality multifunctional green infrastructure, including sustainable drainage (SuDS) to deliver net gain for biodiversity and landscape accessibility for recreational and health needs.
- Towns in The Fens have a unique set of characteristics in terms of layout, building design and character stemming from the nature of The Fens' history prior to and during its drainage, and the fact that The Fens is a peaceful, green, open area of countryside.
- There are already 'attractive places' which are very limited in some areas which should be left alone to allow the community to enjoy them.
- Support a design policy which encourages increased levels of physical activity and supports public art.
- Any policy needs to be grounded in an understanding and evaluation of the areas defining characteristics. Need to define the characteristics of the area to identify appropriate design opportunities and policies. This includes being sympathetic to local character and history including the surrounding built environment and landscape setting and establishing a strong sense of place.
- Seems to be apparent in Kings Lynn & West Norfolk for several years and as such its modern housing areas look attractive and seem to fit in with the area.
- Unsure if FDC planners have the capacity to deal with this.
- Government has just released a design guide for housing and FDC could use an 'Architects Panel' (as in the past) to consider all planning applications.

Comments from those **opposing** included:

- Not sure what that design would contain given the varied type and style of existing buildings. Space standards are appropriate but individuality of design should be permitted.
- Would be meaningless and not considered necessary.
- Good design is a requirement of the NPPF and the forthcoming Building Beautiful Commission. Good design can be dealt with under a generic design policy in the plan.
- Each site should be dealt with on its merits rather than trying to conform to a generic design document.
- All other aspects of the plan regarding development and infrastructure should produce a good strategic design outcome without needing a specific separate policy that might simply confuse matters and give developers opportunities to challenge other aspects of the plan.

Where there was support for a policy this was qualified with the following observations:

- Only if applied rigorously and can be defended at appeal stage.
- Should not be overly prescriptive.
- If put in place (with reasons), needs to be upheld and enforced.
- This is covered by the Framework (NPPF). If a policy is strictly necessary then it should largely reiterate those in the Framework.
- Must balance the needs of business to provide economically viable and practical designs that are sympathetic to their surroundings.

13b) Do you think there is a need for different local design policies for each individual town and / or village?

Summary of issues raised

Of those responding to this question just over 70% wanted different local design policies for each individual town and / or village.

Those in **favour** cited:

- Different settlements can have a distinctly different character and appearance, villages and towns should be individual, important that they are not full of housing that is similar to that in other towns and villages.
- Each town has different opportunities, facilities and problems to overcome.
- Be appropriate to have different policies for different towns, and even different areas of each town e.g. historic areas different to new growing area on outskirts.
- To ensure development is in keeping with local needs and the local environment. Should be sympathetic, in keeping, sensitive.
- Should be a general 'good practice' applied across Fenland. Underneath this policy, each town/village can have additional policies to meet local needs e.g. Chatteris lacks a local nature reserve and Wenny Meadow would meet this need.
- Historic England advises that in addition to a strategic design policy there could be merit in different local design policies for the main market towns to reflect and promote their own unique character and identity. It is important that the evidence base understands and articulates the different characters of the area/town/village.
- Depending on the prevailing traditional styles of each town or village e.g. Cambridge yellow brick is more apparent to the south of the district with the classic red London brick to the northern and western parts.
- Although they may end up with similar design policies, each village/town should be looked at individually.
- Otherwise more character will be lost to hideous new building designs.
- Seek input from relevant parish council.

Those **against** highlighted:

- Other than conservation areas where respecting existing historic styles may be appropriate.
- A design guide can cover the whole district without having to pick out individual towns.
- Good design is a requirement of the NPPF and the forthcoming Building Beautiful Commission. A generic design policy would cover this matter.
- Suggest this is left to neighbourhood plans, but any policy should adhere to the Framework (NPPF)
- Design is something that can be adequately considered by the planning officer determining any application in consultation with urban design colleagues.
- Consult with parish councils – more cooperation between parish councils and planners needed
- Difficult now to say design should be restricted at all e.g. some house builders are the same wherever they are built.
- Unlikely that a local design policy could take into account all design issues relevant to a particular town and village, or take into account future methods of construction, materials or innovative design.

13c) Are there any specific local issues which need to be addressed through design policies?

Summary of issues raised

There were 50 responses to this question with nearly all providing some suggestions. The main points about local issues to be addressed through design policies related to the following:

- Provide good quality housing, well designed and affordable - should be paramount.
- Avoid overcrowded, poor quality and misplaced developments which have occurred in some places.
- Better design - too many boxes.
- Limit number of flats and small box-like housing of one bedroom.
- Basic design principles such as form, scale, massing, materials and architectural style should be informed by the local context but should not be prescribed.
- A lot of poor design in the district - needs a workshop or further discussion as part of the Local Plan process to discuss the issues.
- Buildings to be in keeping with others in area.
- Maintaining sustainable but small communities.
- Conservation areas, which have seen a marked disregard over the last plan period.
- Regeneration, re-purposing or redevelopment of disused buildings.
- Flood risk resilience and resistance measures in new developments.
- Integrated water management to achieve multiple benefits.
- Establish the rights of way network prior to development commencing.
- Provision and accessibility of open space/ green infrastructure.
- Not developing natural green spaces such as Wenny Meadow.
- More trees and hedgerows including around farmland.
- Light pollution.

Other areas raised included:

- Better transport infrastructure including public transport.
- 'Other' infrastructure needs providing e.g. doctors, dentists, police, community facilities, swimming pools, broadband etc.
- Presence of main road routes through a town or village.
- Bypasses for all market towns – for safety and to reduce pollution.
- Sufficient drainage and foul water disposal.
- Public art provided.
- Address emotional wellbeing of residents.
- Respect and reflect local inhabitants wishes above any government quotes.

- Provide self-build opportunities.

13d) Should the Local Plan require developers to use national toolkits, such as Building for Life?

Summary of issues raised

There were 54 responses to this question with just over half being supportive compared to those who were against or had other views.

Those **in favour** highlighted:

- Help achieve high quality developments.
- Prolong the suitability of homes for an ageing population.
- Proportion of all homes should be built using national toolkits.
- Good to draw on the collective knowledge and information that's available.
- Building for Life can be a useful toolkit but it does not feature as much consideration of the health and social care requirements as necessary.
- Building for Life is not mandatory. Design advice and guidance is contained in the Planning Practice Guidance.
- There is a range of other toolkits available to ensure delivery of good design e.g. Cambridgeshire Quality Charter and the Quality Panel's work, Civic Voice that provides input to the "Building Better, Building Beautiful" framework, Natural England's ANGST for open space, and Cabe guidance
- In the past 'Parker Morris' standards were used for council housing which had balanced storage/living/sleeping arrangements.
- Developers should be required to provide long term support for the environment and growth. For too long developers have been able to maximise profits without any long term obligation to its success or minimising any negative impacts.

Those **against** advised

- Difficult to do and does not achieve much in reality.
- Could be suitable for a percentage of smaller dwellings on larger developments.
- Developments just need to comply to new regulations and aspirations.
- Likely to significantly increase build costs and therefore adversely impact on what is already a fragile development viability position.
- Should not be a strict policy requirement. The policy framework needs to be flexible to allow schemes to respond to the local character and site specifics.
- Adds another layer to an already complex planning system.
- Local Plan should cover all necessary areas already.
- Should be dealt with through building regulations.
- Matter will be covered by the Building Beautiful Commission.
- Building for Life is a generic tool that requires subjective judgements to be made. FDC should not seek to allow such generic toolkits to influence development.

Other comments made:

- Should have regard to national toolkits, but local bespoke plans may suit Fenland better. Should be no dilution of national minimum standards, should aim higher.
- Avoid a 'one solution fits all'.
- Need to have good relations with developers to explain why such toolkits are desirable. Would be in builder's best interests to market their projects as being better than others. Application process could ask developers to show how their projects met criteria.
- Need to be used with care as such standards can add to the cost of development but also lessen the appeal of homes to some e.g. Registered Providers will value homes built to Lifetime Homes standards but others may be less keen as this may result in living room sizes reducing as down

stairs bathrooms increase.

Question 14: Optional Standards

Since the adoption of the 2014 Local Plan, the government has set out policy preventing Local Plans from setting their own standards for the design of new homes. New national standards have, instead, been introduced via the Building Regulations system. However, government allows three exceptions to this general rule. A Local Plan can require:

- Internal minimum space standards for all homes, but the standards can only be those as prescribed by government;
- Water efficiency measures in new houses which would aim to reduce average household use of water down from 125 litres per person per day (as required by Building Regulations) to 110 litres per person per day; and
- Higher access standards in relation to access to, from and within buildings, than required by Building Regulations. Such higher standards are generally beneficial to people who are disabled, elderly or have limited mobility, and also allow homes to more easily be adapted in the future.

14a) Do you think the Local Plan should include any of the following optional standards (subject to need and viability testing)? If so why?

i) Internal Space standards of new homes

ii) Water efficiency of new homes

iii) Access standards to new homes

Summary of issues raised

Of the 51 responses to this question those in favour of optional standards outnumbered those against or with other views by about three to one. Support for internal space and water efficiency measures was about the same and slightly more than for access standards.

Those **against** optional standards highlighted:

- The national standards are adequate.
- Deal with via building regulations, not the Local Plan.
- Should be considered on a site-by-site viability basis.
- Internal space standards should be a guide for development but not a requirement.
- Would entail additional work and costings.
- Can impact upon the affordability of such homes.
- Any policy wording should be flexible.

Those **in favour**:

- Will improve living conditions for families, protect the environment and give people with access difficulties opportunity to return / remain in their local area close to their support network of family and friends.
- Benefit the community as a whole.
- Will help respond to pressures on the environment and the impact of an ageing population
- Will ensure the building stock is flexible, efficient and accessibility.

- Current minimum space is not adequate for a normal family, interior of houses should be of good size.
- Small houses can impact on mental and physical health, social behaviour and breakdown of relationships as shown by numerous studies.
- Will help to provide privacy, reduce depression, anxiety and stress, give children room to play and a good night's sleep.
- Strong evidence that children with better quality homes gain a greater number of GCSEs, "A" levels and degrees and therefore have greater earning power.
- Climate change is a real issue and any new building needs to have water/energy saving measures as standard.
- Fenland is one of the driest areas in the country and is "stressed" during periods of drought. Water efficiency measures essential for all developments not just new houses. National standard of 110 litres per person per day is not good enough and should be nearer 80 litres pppd
- Water is likely to be a scarce commodity in the future so advantageous both economically and environmentally.
- Need to make big changes to ensure a future for all, need to reduce the amount of all resources that we use including water
- Anglian Water encourages the use of water re-use measures through its Green Water programme
- All homes should be designed to minimise waste, recycle more and for all citizens to use and contribute to their community
- Change of thinking is required to ensure that potable water is provided "at source" rather than being abstracted and pumped several miles to where it is used. This is currently being reviewed by Anglian Water and should inform FDC's the emerging Water Cycle Study
- The population is ageing: future proofing for adaptability gives best value for money spent
- Important to allow houses to be adapted and therefore support the disabled, elderly and those with limited mobility to live independently in their own homes
- With an increasing older population also need dementia friendly buildings
- Good example of universal usage could be for wet rooms with plenty of space between the toilet and other bathroom features to allow any necessary adaptations
- A one fit national approach is not good. Every area is different, with individual requirements. Any plan must be able to set standards to meet local needs

Other views put forward explained:

- Need to accord with Written Ministerial Statement (WMS) of 25th March 2015 and guidance in NPPF and Planning Policy Guidance.
- If FDC adopt these standards it must provide the necessary justification with robust evidence that they are both needed and would not compromise the viability of development. In considering viability FDC must assess the cumulative impact of all its policies in the local plan.
- Good, if schemes can remain viable following the imposition of standards.
- May not be enforceable by Building Control.
- A lot of very small houses have been created in the modern era. Houses with larger rooms would be desirable but comes down to what the market will support.
- All new housing in the district should be designed to national described space standards with a percentage of larger scale development meeting lifetime homes standard.

14b) Do you have any evidence to suggest the introduction of the above standards would significantly affect viability of housing schemes?

Summary of issues raised

A total of 44 people responded to this question. Two respondents provided examples of how they thought the standards **would** significantly impact viability:

- Foster Homes - can have profound viability impacts if not managed sensitively. Recently adopted City of Cambridge Local Plan requires all new housing to have step free-access which in practice necessitates the provision of lifts for even small flatted residential schemes of 2 stories or more which has given rise to viability issues for small residential schemes.
- Persimmon Homes - experience of providing homes to national space standards is that space standards can increase build costs by 20% and this could result in house prices for starter family homes rising by 20%. Also be direct implications for site yield and the effective use of land.

General points made about how viability would be impacted included:

- Viability of housing developments within Fenland is already a big issue resulting in developments not coming forward. The introduction of such standards would further impact on this.
- Add costs to development and may make some developments unviable, especially on brownfield sites or conversions.
- Other local plans have been cautious of implementing space standards due to viability. Some implement it on all types of affordable housing only and others just on affordable rented properties, in some cases only where grant is available to off-set costs.
- No evidence but any extra cost threatens viability. However ultimate impact is not on house price but land cost.

Comments were also made that the proposed measures **would not** impact on viability:

- Not if designed properly.
- Most are relatively low cost measures.
- Do not believe the introduction of the above standards would significantly affect the viability of housing schemes.
- The inclusion of the optional higher water efficiency standard would not make the Local Plan or individual development proposals unviable.
- Minimum space standards would not affect the viability of the scheme. They would improve the overall development and make them more marketable.
- Reducing water usage helps reduce demand on the sewage network.

Question 15: Meeting Housing Need

The Council will, over the coming months assess the local need for different sizes and types of homes and the amount and type of affordable housing required. This will inform the draft policy in the new Local Plan to be consulted upon next year. However, at this early stage, we would like your views on the types and size of homes you think are needed in the area.

15a) What size, types and tenure of homes do you think are needed, either across Fenland or in your local area?

Summary of issues raised

There were 64 respondents to this question with a variety of views expressed.

The main themes were:

- Provide a range and mix of sizes, tenures and types to achieve viable, sustainable and healthy communities.
- Houses need to be affordable to keep young in the area and provide for local needs e.g. in villages
- There are sufficient high end homes e.g. executive homes but a dearth of terraced houses, flats and affordable first time buyer homes.
- More family accommodation required.

- Provide for an ageing population e.g. bungalows and care homes.
- Provide mix of housing in each settlement (from young to old) for existing residents.
- More small, rental dwellings to prevent homes of multiple occupancy.
- Robust evidence from the latest Strategic Housing Market Assessment (SHMA) should be used to assess particular needs, inform housing delivery policies and ensure that proposals are appropriate for different housing market areas.
- Building of executive homes means Fenland will become an overspill for Cambridge.
- Councils housing policies should not be too prescriptive to prevent/avoid delays in delivery.
- Let the market decide what is built, developers should assess market need themselves.
- Suitable range is needed but demands for types and tenures will vary and therefore flexibility is required.
- FDC should develop own councils houses with housing associations.
- Need to have infrastructure at same time as new housing.

15b) Do you think the Local Plan should have a rural exception site policy to help provide affordable homes in areas with a need?

Summary of issues raised

There were 63 responses to the question with around two-thirds in favour of such a policy, with the remainder against or having alternative views.

Those **supporting** a policy advised:

- Vital there is more affordable housing is available whatever that entails.
- If there is a sufficient need, then it would make sense but they should be for renting only otherwise they will be sold to the private sector as in the past.
- Would support such development if properties were limited to those with close family ties in the area.
- An area that has a definitive need should have a rural exception policy.
- In order to maintain some delivery the plan must enable affordable housing to some forwards as a rural exception.
- Providing it has community support.
- In an area with lower wages it is vital to try retaining younger people and local families in the area or they could be forced to move to areas that do provide homes they can afford.
- Essential given that viability will not enable sufficient affordable housing to be provided funded by developers to meet need.
- Need to also consider what types of affordable housing the Council considers and encourages given the definitions have been widened in recent NPPFs.
- Rural exception schemes support families and communities. There are about 100 in Cambridgeshire but only 5 in Fenland. The local lettings policy means they specifically address community needs
- Government guidance removing the requirement for affordable housing on schemes of less than 10 dwellings limits other opportunities to deliver affordable housing in rural communities.
- Need a policy to ensure the local plan is consistent with the NPPF (2019)

Those **against** a policy cited:

- All new developments should fit within the Local Plan site policy, with developers required to provide affordable housing as part of these developments. Providing exceptions will encourage developers to target natural green spaces, with the excuse of providing affordable homes.
- Might be abused to plunder green space.
- There should be plenty of brownfield sites or infill available without the need to use greenbelt, agricultural land, wildlife corridors etc

- A bespoke plan for existing settlements and a plan for a new settlement should not need this.

Other comments included:

- Should only be for houses to purchase not to rent.
- Do not want any new development that which will make a small village a medium sized one but if houses are to be built need appropriate infrastructure in place.
- Should only be brought forward in conjunction with a strategy that allocates sites for residential development within and on the edge of existing towns and villages.
- The NPPF also supports the delivery of entry level housing sites and a new policy should also address this matter.

15c) Should the plan encourage 'community-led' based housing schemes?

Summary of issues raised

A total of 36 responses were made to this question with over 80% in favour of a policy.

For those in **support** these key matters were highlighted:

- Provided that local people could be found who would be prepared to lead it.
- Would be good where communities are large enough to maintain momentum as it would work on several layers including social behaviour.
- Should encourage 'community-led' based housing schemes providing allocation of the properties is limited to those with close family ties in the area.
- Will help encourage local people to take ownership for their community and instil a sense of local pride that they have helped achieve something for others as well as themselves.
- Encouragement could be provided by relaxation of S106 requirements to improve viability, or potentially specific allocations if a landowner is willing, or exception site policies.
- Such provisions may create loopholes for developers, therefore FDC should be very wary of adopting such a policy and ensure that appropriate mitigations are in place if it is adopted.
- Need to be careful as there will be always be the NIMBY culture where locals want/need housing but do not want it near their own homes for fear of devaluing properties.
- Has been relatively little interest in community led housing in Fenland to date. Such a policy needs to be linked to more efforts to promote the concept locally.
- Would be great if local people could decide what is best for them.

Those **against** or with **other** views explained:

- Community led projects sometimes run out of steam.
- Already too many layers of local government, such as Parish/District/County councils with appoint memberships. This already causes too much red tape.
- Would object if the policy were to favour schemes promoted by the community over those being promoted by a developer. If a site is sustainable and appropriate for development then it is sustainable irrelevant of who is bringing it forwards.
- Against further development in villages but if provided need appropriate infrastructure in place.

Question 16: Gypsy and Travellers

Government's overarching aim is 'to ensure fair and equal treatment for travellers' The Council will assess the needs of the Gypsy and Traveller community through a needs assessment to be prepared over the coming months and ensure their needs are met through the Local Plan.

16a) The Local Plan must meet the needs of the Gypsy and Traveller community. Accordingly, should large scale housing sites be required to include an element of Gypsy and Traveller provision as part of the masterplanning of the site?

Summary of issues raised

There were 45 specific responses to this question with around 70% against provision on large scale housing sites.

Those **against** explained:

- Have enough sites already.
- Provision should be made where this community wishes to live - within the countryside or on the edge of settlements, not within an urban setting.
- FDC should allocate specific sites.
- Need separate allocations otherwise will affect delivery. Could have a major impact on the marketability and therefore viability of a housing development.
- Settled and traveller community are not interested in settling near each other or being integrated, travelling community prefers sites away from other housing.
- If there is tension between the two communities, thrusting them into the same space is not a solution.
- Would be unfair on tenants/owners.
- Often a policy requirement in local plans but rarely succeeds in practice.
- Gypsy and Traveller provision is best provided through a larger number of small sites. A thorough review of potential smaller sites needs to be undertaken by FDC

Those **supporting** such provision highlighted:

- Only if the Gypsy and Traveller community are happy being placed next to the settled community.
- Should be provided with sites in / near towns so they have access to resources.
- Integration rather than isolation is the key to bringing people together in creating healthy communities.
- Should be well maintained and monitored by those stakeholders with enforcement powers to ensure they are used but not abused and that the users are safe and respected
- Is well known and evidenced that Gypsy and Traveller population face a number of inequalities including lack of secure accommodation, and access to education, health care, training and work opportunities.

Other comments made

- Care is needed on locations. Caravans are classed as highly vulnerable and are inappropriate within Flood Zone 3 which poses constraints to the allocation of such sites within the district. Policy should ensure future caravan developments are located in safe and sustainable locations
- Selecting the right location for a site is a key element in supporting good community relations and maximising its success

16b) What other suitable locations for Gypsy and Traveller pitches are there?

Summary of issues raised

Suggestions for suitable locations included:

- Out of town. Remote rural areas.
- Specific sites on outskirts of towns and larger villages where there is the infrastructure in place to support them.

- Expansion of existing sites. Could expand on adjacent land but not possible under existing policy
- Ask the traveller community - they would know best where would be suitable. Need to involve these groups in the decisions.
- Existing sites at Black Drove, Sandbank, Seadyke, Fenland Way, Newcommon Bridge seem to work well having been there over 25 years. Perhaps other [semi] rural locations might be considered.
- A criteria based approach is preferable.
- Small settlements sympathetic to Gypsy and Traveller needs, which mean they have the facility to up and leave and go to another pitch if they want.
- Old brown field sites.
- More short stays places provided near towns.
- Careful consideration needed in allocating new sites to ensure correct infrastructure is in place including for local school places.

Question 17: Park Homes and Houseboats

The government recently introduced new requirements for Local Plans to review the need for moorings for houseboats and sites to accommodate permanent caravans such as park homes.

17a) Is there a need for moorings for houseboats or sites for caravans in Fenland? Any evidence to support your comments would be welcome, or suggestions as to how such need could be identified in Fenland.

Summary of issues raised

There were 31 responses to this question with over half (around 60%) expressing support for more accommodation. They tended to focus on either houseboats or park home sites but general points were also made.

General comments:

- Alternative housing should be supported in the district.
- Do not know of any need.
- If FDC 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.
- Provide, if suitable locations are available.
- Boats, caravans and motor homes visiting or travelling through Fenland provide welcome income to local businesses but on the other hand boats, caravans, old coaches etc. squatting and never moving, create few benefits but many problems for local communities

Houseboats

- Could lead to more tourism, so must be encouraged but mooring fees collected.
- Take advantage of the waterways. There are a great many in Fenland which could be opened up to holiday makers.
- Lack of information of navigation network for visitors.
- Towns could be greatly improved in Fenland e.g. Whittlesey by introduction of a marina off the Bower/Whittlesey river.
- When visiting other areas can see how they contribute colour and flavour to the character of the area.
- Recent survey suggests there are around 600 boats on the local system.
- Insufficient moorings for boats on all Fenland waters e.g. only one at Benwick – more temporary moorings are required and more marinas for long staying boats.
- Mooring provision would open up an alternative form of lower cost housing in the district.

- Moorings could be installed along the 16ft or 40ft near to Chatteris and Manea as they are fairly near to the shops and services of those places. The success of the moorings at March, Whittlesey and Wisbech could illustrate the commercial benefit brought to those towns.
- Need to seek advice of groups such as The Inland Waterways Association when considering moorings.
- Care needs to be given to the allocation of any sites for houseboats. They can be vulnerable to high river flows so clear criteria will need to be set out where it is appropriate.

Park Homes

- Park homes should be considered on the basis of residential development criteria for location but as a valid form of alternative housing provision.
- Well planned and designed park homes type developments can offer a high quality and affordable housing solution. They also enable quick housing delivery. Sites should preferably be allocated
- Not in Tydd St Giles. The golf course already has too many "Park Homes" which are not affordable and bring no benefit to the village.
- More sites are needed for park homes. They offer a cheaper source of housing with no construction costs. The local ones are full up.
- Need to ensure that future caravan developments are located in safe and sustainable locations i.e. not in high risk flood zones (FZ3).

Question 18 - Plots for Custom and Self-Build

The government has introduced new rules that place a requirement on councils to maintain a register of people who wish to find land to build their own homes (known as self-build or custom build homes). Councils are also required to grant planning permission on sufficient serviced plots of land to meet the identified need for self-build and custom build.

18a) Should we require larger housing sites to provide serviced plots for self-build and custom build?

Summary of issues raised

Of the 45 responses there was a mixture in terms of whether this was a good idea or otherwise.

Those in **favour** explained:

- If there is an identified need for self-build housing in these locations.
- Would need to be flexible to allow for the removal of such plots should they not be taken up.
- A percentage could be appropriate.
- May help the viability of some housing developments.
- Brilliant idea, not everyone wants to live in the same type of house or has the same budget.

Those **opposed** highlighted:

- Not necessary to allocate sites as by definition these developers are individualistic.
- Self-build plots will naturally be one-off plots or specific sites, leave it to the market.
- Self-build should be addressed through a criteria-based policy and enabled as a rural exception/ village edge, or through disposal of council property.
- Rural exception sites would contribute additional homes rather than the same house just built differently.
- Planning Practice Guidance suggests that the council should work with landowners to identify suitable sites for self-build and then allocate these sites rather than impose a top down target which will not deliver more new homes only alter the way those homes are delivered.
- Those wishing to bring forward a self-build or custom build house are unlikely to do so alongside a

large scale housing development.

- Policy should encourage the consideration of self-build plots in locations where demand exists.
- Include a mechanism whereby if self-build plots are not taken up within a given time period then these revert back to market housing to be provided as part of the wider scheme. Would provide flexibility and help to ensure that the required housing is delivered.
- Unworkable, should be negotiation between landowner or developer and self-builder.
- Would enable the building of big un-affordable houses which currently already blight our village.
- Self-builders can find their own sites and submit appropriate plans.
- Self-build housing accounts for 9% of the annual UK housing output - demand and take up is slow and niche. Requiring developers to provide service plots coupled with slow take up of self-build would limit housing output and impact on financial viability.

Other views expressed:

- Subject to appropriate site size thresholds taking into account viability and local needs.
- Should be encouraged but not a mandatory requirement, guidance only.
- Include design criteria to ensure that any sites allocated for self-build within areas at risk of flooding include appropriate resistance and resilience measures.
- Depends on the need as evidenced through the register or otherwise.
- Needs to be viable and could hamper development.
- Either need specific allocations for self-build, or requirements for a provision within larger allocations.
- Only require on very large sites (1,000 plus) or on small exception type sites.

18b) Should we allocate sites which are set aside only for self-build and custom build?

Summary of issues raised

There were 46 comments made and as with Q18a) there was a mixture in terms of whether this was a good idea or otherwise.

Those **supporting** this approach advised:

- Only if there is evidence that such allocations are needed and would be deliverable.
- Would improve the housing mix, individual planning for individual homes.
- Self builds tend to be of a high standard, and mid to higher Council Tax bracket provides revenue for the councils.
- Should be encouraged and consideration given to a policy for self-build sites outside settlement boundaries.
- Ensure there are sufficient small sites which are infill which are often brought forward as self-build plots.
- Only if the landowner wants the site to come forward for this purpose. If there is concern about delivery or these they should come forward through other means i.e. by one developer.
- Preference would be that that all sites would be allocated for market housing. However, if sites were to be allocated for self-build the policies should be flexible to allow for slow /no take up

Those **against** cited:

- Don't be site specific.
- Self-build should be addressed through a criteria-based policy and enabled as a rural exception/ village edge.
- Not suitable for Fenland unless it is just a budget price 'equine' site or extensive properties in the middle of nowhere.

- Not for self-build as by definition these developers are individualistic.
- Would be counter-productive as it would be placing these applicants in a clear advantage in finding land, etc. over other interested parties.
- Find their own sites, FDC just needs to be more willing to grant permission.

Question 19: Employment

Fenland's economy has seen a continued shift away from the land-based sector, where employment has reduced due to productivity improvements and new working methods. However, its association with the food based industry has continued. The majority of employment in Fenland is manufacturing, wholesale and retail, business services, healthcare, and education sectors. Together these account for a large proportion of overall total employment.

19a) Should the Local Plan retain existing employment areas in employment use, or should other uses be allowed in these areas?

Summary of issues raised

A total of 48 comments were received in response to this question. Overall there was general support for a flexible approach to the use of employment areas that would allow other uses.

The following issues were raised:

- Support for retention of employment areas especially in employment areas around the Market Towns.
- All employment sites must be re-assessed and only carried forward if still viable.
- Other uses must be considered to make the plan flexible and to help diversity employment opportunity.
- Must take into account the individual merit of all employment areas.
- If no demand for employment use then allow for other uses, land should be used in the most efficient way.

19b) Do any employment sectors in Fenland have specific locational requirements which should be addressed through the Local Plan?

Summary of issues raised

For this question, 38 comments were received expressing views on a mix of industries in Fenland that have locational requirements particularly the need for improved road access as many industries use HGV. Also comments about the need for improved broadband speeds.

Other issues raised included:

- Employment areas must be located near to main transport links and avoid large vehicles have to travel through residential areas.
- Concerns as main employment area in Whittlesey is located on the wrong side of the railway crossing.
- Need to reopen railway line to Wisbech.
- Need to dual A47.
- Local Plan should refer to the approved Local Industrial Strategy.

19c) Are there any barriers to employment growth which the Local Plan could help to address?

Summary of issues raised

A total of 48 comments received for this question with the vast majority of respondents raising concerns

about poor transport links, which are a major barrier and makes Fenland an unattractive area for investment. The following issues were raised:

- Poor road and rail links.
- Poor public transport links limited access to work opportunities.
- Roads are often congested.
- Need for more provision for home working.
- Need for more rural business to support local communities and facilities.
- Need for more education, training and apprenticeships for high quality jobs. E.g. Metalcraft at Chatteris.

A lack of transport infrastructure is seen as the main barrier to employment growth and opportunities.

19d) How should the Local Plan support the rural economy?

Summary of issues raised

For this question, 51 comments were received covering a wide range of issues required to help support rural communities. These issues are summarised as:

- Encourage more scientific industry which is agricultural related.
- Adopting CIL will mean money can be invested in rural areas.
- Plan should allow for business expansion.
- Better infrastructure.
- More development in rural areas.
- Protect local agriculture.
- Improve road network.
- Ensuring adequate infrastructure to support employment growth.
- Current policies too restrictive and do not enable local businesses to expand.
- Enabling home working.
- Promote and market local farmers, growers and food and drink producers.
- Support local businesses with local markets.
- Provide more affordable housing to recognise that jobs in rural economies tend to be lower paid.
- Enterprise zones.
- Stop development of farm land and green spaces.
- Supporting rural diversification.
- Support tourism.
- Additional housing in rural areas to support rural communities.
- Rural exception policy.
- Employment opportunities on the strategic transport network.
- Improve high streets so people don't have to travel to shop.

Question 20: Retail and Other Town Centre Uses

Shopping habits and the wider retail economy are changing. The prevalence of online shopping is creating a very challenging environment for high street retailers. Such changes mean the role and function of our town centres are also changing. National policy says that Local Plans need to consider a range of uses to help provide a positive strategy for the future role of town centres.

20a) Do you agree that the Local Plan should strengthen the role of town centres to encourage people to shop and visit?

Summary of issues raised

There is strong support for a policy that helps to strengthen the role of town centres with over 90% of the 60 respondents agreeing.

However, there is acknowledgement that the roles of town centres and shopping habits are changing and town centres are about more than just shopping.

The following issues were raised:

- Centres are in decline and need to be more than just shopping.
- Town centres are undergoing radical change and need to adapt.
- Need to understand why town centres are failing.
- Need for a bold new approach as more spending will be lost to Peterborough and Cambridge.
- Need to attract other users and create thriving mixed use town centre.
- A strong town centre is not just about shops, needs a balance with attractions, services and community.
- Need for leisure uses for community and socialising.
- Town centres are at the heart of communities and important for bringing people together and socialising.
- More support for local businesses.
- Need for reduced costs for retailers (e.g. reduced business rates).
- Need to encourage small local business and artisan businesses to town centres.
- Concerns that traditional local plan retail policies must not be repeated, there is a need for larger out of town retail as part of wider sustainable mixed use developments.
- Change of use to housing would bring more people to the town.
- Need for attractions such as open spaces or county parks.
- More of an evening economy. Too many towns become ghost towns at night.
- Enhance the historic environment of town centres and historic shop fronts.
- Reduce the number fast food chains.

20b) Should existing shops be protected or do you think other types of development such as leisure and recreation should be encouraged in the town centres?

Summary of issues raised

A total of 32 comments were received for this question, with the majority supporting the need to protect existing shops, but also supporting other uses to help regenerate town centres. Many of the issues raised are similar to question 2a and are summarised as follows:

- Existing shops should be protected.
- A strict policy protecting high streets for shops will lead to many vacant units need to encourage other uses.
- Promoting other types of development would help to strengthen town centres.
- Leisure and recreation are supported and will attract more people to the towns.
- Increased residential is supported.
- Town centres have to change to survive.
- Mix of uses should be encouraged.
- Promote towns more and encourage tourism.
- Nature reserves and open space would attract visitors.
- Not sure how existing shops can be protected without a reduction in business rates.

20c) Should the retail hierarchy be amended? What changes should be made and why?
Summary of issues raised
<p>There is mixed support for the need to keep or amend the retail hierarchy. Some respondents would like to see a more flexible approach. It is suggested that a new approach is needed. A policy needs to look at the role of town centres rather than retail on its own.</p> <p>The following issues were also raised:</p> <ul style="list-style-type: none"> • Some support for hierarchy and no changes with larger shops located in larger towns. • Some support for no hierarchy more flexible approach, letting market forces decide the best location • A flexible town centre is required. • Allow for a wider range of uses within primary shopping areas. • Concerns that there is too much focus on Wisbech and March which puts other towns at risk. • A suggestion that Wisbech and March should be lower to hierarchy to help support other areas.
20d) Do you think the boundaries of any Town Centres, District Centres, Local Centres and Primary Shopping Areas need to be extended or reduced? If so, which and why?
Summary of issues raised
<p>A mixed response to this question with the majority of the 34 respondent's stating no need for any change to town centre boundaries, however there was some support for both the need to extend and reduce the size of town centres. The following issues were raised:</p> <ul style="list-style-type: none"> • Should not be extended, make use of vacant building first. • Town centres need improving before considering the need to change the boundary. • Increasing town centres will help increase a wider range of uses. • No change as the market will dictate. • There is a need for a complete reassessment of all town centres.
20e) Should the new Local Plan set a threshold for when an Impact Assessment for out of centre retail is required, such as 500 sq m in the current Plan? If so what should the threshold be?
Summary of issues raised
<p>A mixed response to this question with approximately half of the 34 respondents requiring a lower threshold to set by the local plan and half supports use of national policy.</p>

Questions 21: Community Infrastructure
<p>The new Local Plan will ensure that new development is supported by appropriate infrastructure for transport, schools, health, open spaces, community facilities and water supply and treatment.</p>
21) Do you think the Local Plan should include a policy to protect the loss of existing community facilities?
Summary of issues raised
<p>For this question 65 people responded with over 90% supporting the need for a policy that protects the loss of community facilities. There is strong support from local residents, particularly in rural areas to support rural communities. Concerns that too many local facilities have already been lost</p> <p>However, it was acknowledged by some respondents that in some cases facilities are no longer viable. When community facilities are no longer viable then alternative uses should be explored.</p>

Important to protect a range of community facilities including:

- public rights of way and other public routes which are of valuable community assets. Such as Woodman's way which follows the old railway line between Wimblington and March.
- Natural green spaces, such as Wenny Meadows.
- Sports facilities.
- Pubs in rural areas.

The following issues were raised:

- More growth in villages can help support rural facilities.
- Loss of facilities must involve community engagement.
- Council needs to do more to promote the Assets of Community Value process.
- Any loss must be mitigated against.
- Why have a policy to encourage new infrastructure if existing infrastructure is not supported.

Questions 22: Transport

The main transport and infrastructure requirements for the Fenland area are set out in the Cambridgeshire and Peterborough Local Transport Plan (LTP) which is a document prepared by the Cambridgeshire and Peterborough Combined Authority. Therefore, any Local Plan policies must support this.

22a) Should the Local Plan place a strong emphasis on encouraging walking, cycling and public transport or does the rural nature of Fenland mean the private car will always need to be accommodated as a priority?

Summary of issues raised

There were 78 responses to this question, with strong support for encouraging more walking, cycling and public transport which are presently lacking but with recognition that the rural nature of the district means that cars will always be needed. However the need for cars could be reduced if other forms of transport were improved. Comments covered the following topics:

- Encourage alternative transport methods however recognise the need for private cars, rural areas will always need to use cars owing to lack of public transport.
- Reliance on cars is not good for the elderly or young especially.
- Need for more reliable and frequent bus service.
- Bus services should be increased
- Improvements in cycle routes.
- Should encourage a mixed transport economy, including HGVs.
- Many elderly people unable to walk far or cycle etc. Buses currently are too infrequent to be of any real use. The car is essential. Many longer journeys can only be done by train so car is needed to get to stations.
- Climate change and carbon emission reduction means this is essential.
- Direct development to settlements which are or can be made accessible by walking, cycling and public transport e.g. March is well served by rail
- New homes can help keep rural bus services viable.
- Public transport and walking and cycling is particularly poor in Chatteris with knock-on effects including loss of local amenities.
- Public transport will have to be subsidised to improve services, heavy investment in public transport is needed before the car is not needed.
- Road pollution is a major worry in towns. A bypass for Whittlesey should be given priority.
- Should place greater importance on creating and enhancing the rights of way network for non-

motorised user routes, which includes walking, cycling and equestrian as outlined in the Cambridgeshire Rights of Way Improvement Plan.

- Refer to the Local Transport Plan.
- The Active Travel Initiative should incorporate all non-motorised users for journeys for all purposes
- A sustainable transport network with good cycle, walking and affordable and regular public transport will encourage uptake and help reduce people's reliance on car travel and bring significant health and environmental benefits.
- Such a policy as it would encourage healthy lifestyles, and improve overall health
- The NICE physical activity and environment guidance concludes that people are more likely to walk or cycle if there is an attractive streetscape with well-maintained and unobstructed pavements.
- Should place a strong emphasis on alternative means of transport for health benefits, enjoyment of natural surroundings and to mitigate the effects of climate change
- Due to the nature of the roads (poorly maintained, too fast drivers) cycling and walking is currently very dangerous. Doubt this will ever change.
- For mobility issues – have free charging points for mobility scooters.
- Towns should have a circular frequent cheap bus service joining the estates to the town centre, doctors surgeries, leisure centre, bus station and rail station etc
- Should make it easy and pleasurable to take exercise and get about it should be safe and fit for purpose in 2020, not what was acceptable 50 years ago. FDC should make good provision for safe off road paths for all non-motorised users including equestrians
- No reason why both cannot be achieved by locating new development in locations where users have a range of travel options

22b) Do you think the new Local Plan should set parking standards? If so please provide further comments to explain what standards you think are needed and where they should apply.

Summary of issues raised

There were 56 responses to this question and comments covered the following issues:

- Yes, cars will dominate for foreseeable future as people will use cars to drive to local shops, school run etc and as developers can't sell houses without car parking spaces.
- No, as the NPPF emphasizes the presumption in favour is sustainable development and encourages alternative transport modes.
- Need adequate parking for market towns to thrive. When town centres are in decay, footfall needs encouragement so free parking in town car parks and alongside shopping areas should be extended where possible.
- Have free parking for 2/3 hours then apply charges.
- Parking standards should be set out in policy; however some flexibility should be incorporated which allows lower standards of provision in sustainable locations. Suggest the following standards:- 1 bed units - 1 space, 2 bed units - 1-2 spaces, 3+ bed units - 2 spaces.
- At least two parking places for each dwelling.
- Need sufficient parking to accommodate multi car households e.g. seem to be a number of homes whereby the parking provision is inadequate e.g. 1.5 parking spaces for a four-member family where it is common for households to have more than one car
- Parking spaces should not include garages which are frequently used for storage and are often too small to accommodate a family car.
- If developments don't improve non-car modes of transport then need significant improvements in parking provision for new houses are needed as the Fens are so car dependent
- Car parking can be a tool to influence development types but whether there are minimum or maximum standards each site should be considered on its merits and flexibility is required
- New homes should ideally have parking spaces on site, if not in communal secure areas
- Refer to the Local Transport Plan

- Should vary depending on location, needs to be a policy on town centre parking and parking standards provide in residential developments
- Existing standards are about right, however reduced standards could be set for central locations of larger settlements with better transport links (i.e. the marked towns) where there isn't such a high dependency on private vehicles
- Need to balance the need for parking spaces with the availability of other active travel means.
- Would support a restrictive car parking standard policy if it can be shown there are suitable alternative methods of transport available
- More thought needed for easier parking and controlled parking in heavily used areas; should be discouraged from parking on the highway and pavement parking
- More effective enforcement needed
- Very difficult to obtain disabled parking permits. There are more bays than legitimate users and many more people who could be helped but aren't eligible
- Larger spaces required to suit modern vehicles
- For the future it is important that car parking spaces are concentrated rather than assigned to a house. When automated vehicles come in car ownership will decrease and rental (taxi) will increase. Communal parking areas could then be reallocated to other uses

Question 23: Historic Environment

The Fen landscape has a unique rural character; large scale, flat, open landscape with extensive views to the horizon. The huge skies give the area a strong sense of place and tranquillity.

Each of the four market towns in the district has its own individual, historic character which has evolved over time.

In Fenland there are 20 scheduled monuments, 10 conservation areas and over 650 listed buildings of special architectural or historic interest. The gardens of Peckover House in Wisbech are included in Historic England's register of parks and gardens of special historic interest.

23a) Should the Local Plan go beyond the minimum requirements for protecting the historic environment?

Summary of issues raised

There were 61 responses to this question with 67% in favour of wider protection:

Those **supporting** wider protection highlighted:

- The NPPF (para 185) requires Local Plans to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment
- Expect to see appropriate references to 'setting' in policies and should recognise the interrelationship between the historic environment and landscape. Conservation and enhancement of the historic environment can bring a range of multi-faceted benefits which can help achieve spatial planning goals
- After discussions and public involvement
- Should consider not only Listed Buildings and those identified as buildings of Local Importance, but also require developers and the council to take into consideration the historic nature of non-designated historic assets and the character and layout of the town.
- Historic areas, as well as buildings, should have increased protection.
- Should protect TPO trees, many have gone (e.g. in Chatteris) resulting in loss of age, maturity and

special setting that they provide to areas.

- Need additional protection for natural/open green spaces (such as the historic Wenny Meadow – an 18th/19th Century landscape park with medieval features) and the important waterways around Fenland.
- Also protect trees, hedgerows, meadows and roadside swathes and the most important landscape features
- Protection of historic common and open spaces can support physical health and mental well being
- Should also address Heritage at Risk both on the National Register and on the local register.
- Need to address technical archaeological matters.
- Protect for future generations.
- There is so much commercial farming in Fenland that anywhere or anything with historical significance should be valued and protected, as different.
- Plastic windows should be prevented or removed in Conservation Areas and from listed buildings
- Impact on historic buildings could be lessened by not encouraging development of HMOs or requiring changes for today's retail requirements.
- Nature reserves that should be nominated for SSSI. Kings Dyke Nature Reserve may benefit from the Must Farm Heritage Centre.
- Aspire to do more than the minimum wherever possible.

Those **against** explained:

- Listed Buildings and Conservation Areas Act 1990 already covers listed buildings and scheduled monuments of social architectural or historic interest.
- Each case should be considered on its own merits.

Other views expressed:

- If somebody is prepared to take on an old building, restore it and retain its appearance as far as is practical, do not put too many 'heritage' obstacles in their way.
- Need to protect our past but not necessarily at the expense of the future, so a balanced view needed.
- Parson Drove conservation area needs re-visiting.
- FDC needs to avoid providing additional protection without the necessary justification. Any additional protection or to identify buildings of local importance will need to be evidence based.

23b) Should the Plan identify buildings of local importance?

Summary of issues raised

There were 59 responses to this question with just over 80% in favour of identifying Building of Local Importance. Reasons for **support** put forward include:

- They largely define the character of rural towns.
- Need to be in line with current guidance in NPPF.
- Recognise we are in the 21st century and that 20th century architecture is now historic.
- To avoid mistakes of the 1960s and 70s.
- Fenland Civic Societies have long hoped for a "local list" or a similar scheme to provide further protection for currently non-designated heritage assets. This could help to provide more guidance and certainty for the public, building owners and developers.
- Any scheme to protect BLIs should be straightforward and allow submissions of buildings of interest at any time. Such a scheme could be modelled on FDC's existing process for identifying, nominating and assessing applications for Asset of Community Value status. This system seems to be well-developed and would most likely need minimal changes in order to support the creation of a process for managing a local list.

- Local communities need to be made aware of the significance and importance of these buildings
- Also include any land which has strong historical links to the buildings e.g. Wenny Road Meadow, which was once the manor park to the adjacent Manor House, should enjoy the same protection given to the house.
- Need protection even if not historic i.e. of architectural quality.
- Providing they can be protected in some way from decay, unsuitable redevelopment and unsuitable nearby developments.

Those **opposed** to identifying Buildings of Local Importance highlighted:

- They receive designation via the listing system if appropriate.
- Current policies are adequate if used correctly.
- There already are areas in the local plan and local Neighbourhood Plans feature conservation areas – leave it to those documents.

23c) Are there any areas that you think require additional protection that are not already identified as conservation areas?

Summary of issues raised

There were 44 responses to this question. Of those putting forward a view around 60 % were in favour of additional protections with about 40 % against.

Those **against** stated:

- Existing conservation areas are accurate.
- Conservation areas need to be reduced.

Those in **favour** of additional protection specified:

- Wenny Road Meadow (aka Manor Park) in Chatteris. This historic space still shows the medieval ridge and furrow farming from before it was a manor park (c1800). It is a rare, unspoilt and unmanaged natural green space with high biodiversity. The field has been used for town sport days in the past, along with galas and agricultural shows.
- Any natural and unique (including historic) open green spaces.
- Important waterways and drainage areas that protect vital areas against flood risk.
- Nature reserves.
- School playing fields.
- Anywhere that is not commercially farmed should be protected. There is little beauty here. Natural areas provide beauty and habitats for wildlife. Preserve and enhance what little there is.
- All open, rural, agricultural land. Small rural village locations define the Fens and should be preserved.
- The Wisbech Town Centre Conservation Area, should be considered for extension to include the area bounded by Queen's Road, Victoria Road and Churchill Road, including Tillery Field. This is a contiguous area of Victorian terraced and semi-detached houses, of a construction and style that merits some protection from inappropriate development and alterations.
- Parks e.g. Wisbech Park. It is over 150 years old with many rare and original trees. When they are felled for various reasons they are not being replaced. A recent survey by the arboriculturalists estimated that with 40 years there will only be 29 trees left down from the present 219. This would be a great loss and goes against all current policies regarding the health benefits of open spaces and their contribution to helping control climate change.
- Georgian frontages on North and South Brink, Wisbech.
- Historic vernacular buildings such as mud walls in Whittlesey, some are outside the Conservation Area.
- Tydd St Giles - area around the church in could be afforded more protection including the old school

opposite the church.

- Parson Drove Green plus the 'Cage'.
- The view from Benwick Road to St. Mary's Church, Doddington.
- Local representatives should be able to nominate such areas following consultation with the local inhabitants.

Question 24: Natural Environment

"Our natural environment is our most precious inheritance" according to the government's 25 Year Environment Plan, which also states that the government's aim is to be "the first generation to leave [the] environment in a better state than we found it and pass on to the next generation a natural environment protected and enhanced for the future".

National planning policy is more specific as to what development should do, including a requirement for a 'net gain' in biodiversity. Natural Cambridgeshire, the Local Nature Partnership for our area, has recently (June 2019) agreed a vision to double the area of rich wildlife habitats and natural green space across Cambridgeshire and Peterborough, with the aim of creating a world-class environment where nature and people thrive, and businesses prosper. The Combined Authority for our area endorsed that vision in July 2019.

24) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

Summary of issues raised

Around 64 responses were received to this question with the vast majority offering a wide range of suggestions:

- Support reference to the biodiversity net gain aspirations of Defra's 25 Year Environment Plan, the NPPF and Natural Cambridgeshire's Doubling Nature vision; the vision has been endorsed by the Combined Authority and recently translated into the Cambridgeshire Doubling Nature Investment Plan.
- Include a policy requiring a minimum of 10% net biodiversity gain (as mandated in the Environment Bill) for all relevant development, with an aspiration for 20%.
- Produce a biodiversity/green infrastructure Development Plan Document (DPD) to "identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks", as required by NPPF 2019 (paragraph 174), and opportunities for enhancement (as well as other Green Infrastructure elements).
- Natural capital investment planning should be undertaken in Fenland to identify the most effective way to deliver appropriate environmental net gain; set an ambitious vision for green infrastructure.
- Create new ecological habitats in areas identified through the Cambridgeshire and Peterborough Biodiversity Group habitat opportunity mapping project.
- Prepare a strategy to inform the appropriate location of site allocations and identify opportunities for delivery of biodiversity and green infrastructure enhancement projects.
- Work with the Local Nature Partnership to fulfil the ambition of doubling the area of rich wildlife habitats and greenspaces.
- Local Green Spaces designations, combined with hard settlement boundaries, should be used to protect existing natural areas. Support 'Open Green Spaces' applications.
- Promote and protect green links between villages and maintain green boundaries, agricultural land, around and between built up areas.
- Include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 98 of the NPPF.

- Set criteria based policies recognising the hierarchy of designated biodiversity and geological sites and ensure their protection. Clearly distinguish between international, national and local sites. These designated sites should be protected and, where possible, enhanced
- Have policies to ensure protection of woods and trees, particularly irreplaceable ancient woodland and any opportunities for woodland creation.
- Have a programme of tree planting across the district, have a tree replacement policy to include FDC.
- Enhanced protection of TPO trees; half of trees in Chatteris supposedly covered by TPOs no longer exist.
- Protect and replace hedgerows in the countryside.
- Retain existing green spaces and natural green spaces - such as that at Wenny Meadow.
- Protect rivers, improve paths and tracks along rivers, resist developments near rivers.
- Wildlife corridors should be identified and protected, plan for ecological networks.
- Sensitive design of new development. Have linked walkways to meander through housing developments for dog walkers and cyclists to encourage healthier lifestyles and facilitate wildlife.
- Have good landscaping schemes for housing and other developments which are policed.
- Safeguard previously developed land where it is of significant importance for biodiversity and/or geodiversity.
- Work with developers and Natural England to identify a strategic approach to great crested newt mitigation.
- Apply Woodland Trust's Woodland Access Standard i.e. 1) No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size; and 2) There should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.
- Each town to have its own large park with access to existing/new nature reserves. Develop "pocket parks" as in March.
- New roads should have large verges planted with trees, strewn with wild flowers.
- Green roofs should be encouraged on businesses and new housing.
- Landscape parks and open space often have heritage interest which should be highlighted – another element of 'multi-functional'.
- By implementing the protection of existing natural green spaces and wildlife rather than just talking about it.

Some comments highlighted potential issues:

- Take into account that many of the biodiversity net gain measures will need to mature beyond the build period.
- Delivering a minimum 10% net improvement in biodiversity will have a significant cost impact on development. Cost of developing greenfield sites could be a considerable expense and a more considered approach as to the impact of this policy requirement is necessary. Government suggests in the region of £20,000 per hectare. However, Savills suggests this could be substantially more at between £9,000 and £15,000 per dwelling.
- Sufficient national policies exist.
- Any FDC policy should not go beyond the requirements of national policy.
- Protection of best and most versatile agricultural land - should be considered in context of the overall planning balance.

Question 25: Open Space Standards

The new Local Plan can require new development to provide open space. The 2014 Local Plan sets standards for the provision of the following types of open space:

Country parks
 Children's play
 Natural green space
 Allotments
 Amenity greenspace
 Sports pitches and playing fields

During preparation of the new Local Plan, open space standards will be reviewed. Alongside, or shortly after, consulting on this Local Plan, we intend to undertake separate more detailed consultation on open space needs and desires, so please check our website for further details on this.

25a) What type of open space should new development provide?

Summary of issues raised

There were 58 responses to this question with the vast majority being supportive of providing open space as part of developments. The need for all types of open space was highlighted the most favoured types were children's plays areas (equipped and grassed areas of play) (33%), followed by natural greenspace & woodlands (22%) and sports pitches and playing fields (10%). Amenity grassland, country parks, park areas, allotments, community gardens and community orchards, dog walking areas and nature reserves were also mentioned.

Other comments raised included the following:

- Open space can provide a key part in enhancing larger developments.
- Provide a wide range of open spaces that encourage healthy lifestyles and cater for a population's wide ranging needs and desires.
- All green space has value, all types needed.
- Natural England advises a strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in the NPPF. FDC need to prepare a map of the existing ecological network including designated sites, priority habitats and other important green spaces to identify key areas for protection and delivery of strategic/landscape-scale enhancements which should be used to develop a strategy to inform the appropriate location of site allocations and to identify opportunities for delivery of biodiversity and green infrastructure enhancement projects through the Plan's biodiversity and green infrastructure policies.
- Critical to the future sustainability of Fenland that there is significant investment in the natural environment, to make up for the lack of strategic and local natural greenspaces. The country parks previously promised for Wisbech and March should be given policy backing and suitable locations identified in the Local Plan policies and maps.
- Need to refer to Fenland Playing Pitch Strategy as this is robust local evidence base and gives priorities for provision for outdoor sport – should be used to develop priorities.
- Reference should be made to the county wide Future Parks Accelerator project .
- Little expectation that developers will provide country parks and natural green spaces so it is the responsibility of town and district councils to ensure they are part of any future local plans. To not do this condemns and deprives future generations of their right to a healthy and happy life where they live.
- Creation of new green space should not be at the expense of existing natural green space. It is not possible to replace the unique biodiversity of a natural green space once that green space has been destroyed.
- Need outdoor sports facilities e.g. gym equipment. table tennis tables, basketball nets, social seating, footpaths.
- Better size gardens – less houses.

- New developments should connect communities with the outdoors in creative ways i.e. a mix of natural green space with things to entice people e.g. Little Acre Fen pocket park (which contains fruit trees and bug hotels, among other things) and Wenny Meadow.
- View from Benwick Road towards St. Mary's Church should be made into a permanent open space or public park. Would make a beautiful permanent feature in the middle of the village and increase the facilities for people to walk, meet up and socialise. View is already identified in the conservation plan as a place of special interest.
- Visitor moorings and long term moorings for boaters.
- Keep existing policy and hierarchy depending on size of development.
- FDC has a duty to address shortfall, new developments cannot be made to do this.

25b) What do you think of the quality of open space in your area?

Summary of issues raised

There were 36 responses to this question, which provided a mixed picture with just over 40% describing the quality of open space in their area as good or satisfactory. However, for some the open space quality was described as abysmal and poor with Chatteris and Wisbech the most criticised settlements in terms of provision.

A flavour of responses is as follows:

- Chatteris has very little in the way of open spaces what there is should be protected. Vitally important to protect the existing open green space, such as Wenny Meadow and the disused railway line.
- Despite being surrounded by open countryside and industrial farming, Chatteris contains virtually no areas suitable for a particularly long, meaningful walk alongside nature. There are no safe joined-up places to walk around the town and but they are not easily accessible from the north and east.
- Furrowfields open space in Chatteris is a poor quality pocket park.
- Wisbech - not enough as most of it. Most dedicated for horticulture and as such is inaccessible. No immediate access to a nature reserve and although there is the river there are no lakes or large ponds for wildlife or for people to enjoy.
- Very good in Leverington, good in Parson Drove, not much in Whittlesey.
- Poor, in some areas of the parish (Wisbech St Mary PC). Poor within Murrow - There are no sports facilities (toilets/club house) just football pitches and play area for older children (skateboarding/high rise climbing).
- Adequate provision, especially given the additional development within and on the outskirts of the villages over recent years- improved by the recent acquisition of the tow path by the parish council (Elm PC).
- Well served for formal open space - have two recreation fields and areas where views to the village centre and the open fields are available. Should be careful not to infill these (Doddington PC)
- Could be improved. Poor availability and no provision for large team organised sports (Benwick PC)

Other criticisms include:

- Notable absence of trees in some areas
- Good as long as no more houses are built in the village.
- Sport area too small; children play equipment not central.
- Ball games are often restricted.
- Poor, with concerns it will worsen without stronger protection.
- Good but lacking wildlife areas.
- The best is often the private areas with footpaths across.
- Most open space is privately owned by landowners. Its use by the public is determined by the good will of the farmer.

- Poor sports facilities.
- Quality of open/green space varies throughout but in light of the Future Parks Project work this will help identify future funding models for improving the quality of local open/green space.

25c) Should the Plan identify other areas of open space to be protected?

Summary of issues raised

There were 52 responses with over whelming support (82%) for other areas of open space to be protected.

The issues most highlighted were:

- All open spaces should be preserved. Where none exists, create it not begrudgingly but properly considered and designed.
- Fenland is poorly serviced in terms of accessible green space and a well-connected rights of way network. Lack of sufficient outdoor space for people to explore and connect with nature, go for walks and find peace and tranquillity. Local plan should address this and identify areas for new green space and rights of way routes.
- Waterways and embankments. They provide interesting walks, but these are quite linear and there are few places where they can be crossed to complete a more circular walk. Strategically placed footbridges across the waterways would greatly help .
- School playing fields and woods.
- Private green spaces within developments.
- Large swathes of major roads verges and roundabouts could be planted with trees to cut down on noise, absorb pollutants and provide a food source for insects and birds.
- Only where open space is of national importance, of special scientific interest or having a state of natural beauty.
- Only designate as Local Green Space if evidence is available and national guidance is followed
- Should use the “Accessible Natural Greenspace Standards” model (ANGSt) to determine if there is sufficient green space available to residents in Fenland and its settlements.
- The Future Parks Project will help to inform what types of open space are needed.
- Protect the open green spaces for the community and their well-being and for future generations.
- Wenny Meadow should be protected as an open space, as it is valued by the community, is steeped in historical features and biodiversity, and because Chatteris is so deficient in open green space (which is beneficial for both physical and mental well-being). Should be designated as a Local Green Space and it could become a wonderful amenity for the town.
- Country parks should not just be identified but delivered.

25d) Do you have any specific standards that should be applied to all development schemes (such as a certain area of land for open space per certain development size)?

Summary of issues raised

There were 40 responses to this question with about 60% in favour of standards for all development schemes.

Those in **favour** mentioned:

- All new developments should have effective and usable open space land.
- Would want the council to use the “Accessible Natural Greenspace Standards” model (ANGSt) for all development to determine if there is sufficient green space available to residents in Fenland and its settlements.
- ANGSt standards could be applied to settlements in Fenland to guide future planning and provision of local natural greenspaces but a new approach will be needed to ensure the provision of sufficient area of strategic natural greenspace. This will need to be developed collaboratively across

Cambridgeshire & Peterborough Local Nature Partnership area, through the "Future Parks Accelerator" programme.

- Would encourage the council to set high standards and seek to explore what standards other councils have.
- When an area is developed open green places should be provided by law.
- Equally, if not more, important to preserve and give access to natural/unstructured green space. Such natural spaces do not sit within a development, but outside of it. Development should not be permitted on the existing natural spaces, such as Wenny Road Meadow in Chatteris – once developed they cannot be reclaimed.
- Protect the historic natural landscape of the fens over profits.
- Protect water causes and drainage when building more developments.

Those **against** standards specified:

- Should be flexible and judged on a case by case basis, determined by the scale and type of the development.
- Determined with developer taking account of viability.
- The market will regulate itself.
- Should be up to national/district standards.
- Lots of small open spaces can create problems with maintenance.

Suggestions for **specific** standards included:

- About one fifth should be open space for recreation.
- In rural areas everyone should be within half a mile's walk of a safe and open green space of over 150m².
- Provide in large developments of 10 or more houses.
- 1 acre of green space and woodland per 10 houses.
- Overall target levels for larger sites (100+) otherwise appropriate private landscaping and landscaped margins to circulation routes.
- ANGSt approach - 2 ha of natural greenspace within 300 metres of all residents.

25e) Should we work with neighbouring authorities with the aim of establishing common standards across Cambridgeshire and Peterborough?

Summary of issues raised

There were 53 responses to this question. Those in favour of common standards outnumbered those against by about two to one.

Those **against** cited:

- Should be done on a site by site basis. Blanket standards bare no relevance to site constraints and other factors influencing the provision of open space.
- Each area has its own attributes and needs and priorities. The characteristics of the Cambridgeshire authorities are very different - a standard homogenised approach is not appropriate.
- Trying to set common standards will fail to recognise the unique character and needs of Fenland. Bespoke standards for Fenland (or even parts of Fenland) will always be preferable.
- Concentrate on this area and lead by example but share best practice.
- Would slow down process and also what works for Fenland may not work elsewhere and vice versa.
- Fenland is more rural than other districts therefore it has less dense development and more open space. Common standards across the County may not be relevant or beneficial.
- No reason to standardise everything. If that happens it is not unique and worth visiting in terms of tourism.

Those in **favour** highlighted:

- Widely known and accepted standards will always work better, highly advantageous to have consistent policies.
- Could simplify the planning system for developers that operate in more than one council area.
- Fenland has much to learn from other areas of Cambridgeshire and Peterborough and would encourage FDC to set up forums and “communities of practice” for officers and councillors to share ideas, learnings and best practices across the different council areas.
- FDC Officers are already working with colleagues from other LAs across the County as part of the Future Parks project on establishing common green space standards. This is very much welcomed and will bring benefits in terms of costs.
- The Local Nature Partnership, through the "Future Parks Accelerator" programme is working with all local authorities across Cambridgeshire and Peterborough to undertake an audit of open spaces and to help frame standards for different types of open space. There is a desperate need for more natural greenspace and strategic natural greenspace (Cambridgeshire has no downland, moorland or coast open access land) and has a far less accessible countryside than most counties in England. The public rights of way network is also very sparse, particularly in Fenland.
- Peterborough has some nationally leading environmental credentials. It also has integrated open spaces and tree planting as standard in urban and commercial developments.
- If preferable why not work with West Norfolk and South Holland too.
- Might help to mitigate the decision making process of own town council.

Question 26: Flood and Water Management

Flood risk is an important issue for the district due to the flat and low-lying landscape of the area and impact of climate change, with related sea-level rises and increased incidents of heavy rainfall. On its flood zone maps, the Environment Agency identifies specific zones of flood risk across Fenland.

26a) Do you have any views on how new development could reduce flood risk?

Summary of issues raised

There were 64 responses to this question with the main themes summarised below:

- New development will always increase flood risk, therefore reduce the amount of new development
- Don't build on flood plain or areas that are potentially liable to flooding e.g. Sutton Road, Leverington
- Continue use of Sustainable Drainage Systems (SUDs) for surface water disposal for both developments and re-developments through sensitive, sustainable design - should be made explicit in the Plan.
- Utilise above ground SUDs e.g. swales, balancing ponds, mini-lakes, soakaways, green roofs (e.g. all flat roofs) as below ground storage systems are not sustainable.
- Surface water connections to the public sewerage network only to be provided in exceptional circumstances - applicants need to follow the surface water hierarchy (utilising methods as high as possible within hierarchy which should include water re-use before infiltration).
- For foul drainage need to show there is capacity available within both the foul sewerage network and receiving Water Recycling Centre to serve the development or can be made available for it in time.
- All developments to include a drainage strategy to manage surface water.
- Minimise loss of green space, retain/plant more trees, hedgerows and vegetation.
- Minimise hard landscaped areas, use permeable paving.
- Recycle rain water with source control and grey water systems.
- Seek flood risk betterment through any large scale development to include financial contributions towards the improvement of existing flood defences, which could also benefit other communities at

risk of flooding.

- Provide adequate infrastructure and site specific flood mitigation measures.
- Realistically assess risk. Current methods ignore defences and well managed drainage system
- Areas at risk of flooding should not automatically be dismissed as development sites as different areas within a site could accommodate 'sacrificial uses' and still allow for the efficient use of sites in sustainable locations.
- Defences will always be maintained, so to base planning policy on a theoretical flood assuming no defences exist is meaningless.
- Take an integrated approach to new infrastructure, new development, green space and water management to have 'win-win' opportunities to reduce flood risk at the same time as improving infrastructure.
- Mitigate impacts on existing residential development.
- Provide resilience in buildings, do not allow ground floor bedrooms in high risk areas, provide dwellings which raise/lower during flood events.
- Natural Flood Management should be incorporated to complement existing defences as this, like SuDS, can also provide wider benefit to an area.
- Some areas of new habitat created through biodiversity net gain could also function as part of natural flood management systems helping to reduce flooding elsewhere or manage run off from new and existing developments.
- Leave some areas as natural flood plains that serve to take excess water and double up as nature reserves.
- Do not build on land which acts as a natural balance pool (sponge) – holding water which is slowly released into the waterways and so avoid flooding.
- Don't build where surface water sits after rain.
- Consider impact of new highways.
- Biggest threat will come from rising sea levels rather than from the western river flow.
- Laws needed to ensure building is only allowed where water can drain away and it is a minimum height above sea level.
- Close liaison and working with Risk Management Authorities (RMAs) i.e. Environment Agency, Internal Drainage Boards, Anglian Water, Cambridgeshire Highways, FDC is needed, and to work to known regulations and guidance.

Question 27: Any Other Comments

This consultation document has set out what is proposed for the new Local Plan, but there may be additional items not covered in this consultation which you would like to raise.

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?

Summary of issues raised

There were 67 responses to this question raising a wide number of issues:

- Need to meet the requirements of the NPPF (Feb 2019) in terms of being positively prepared, justified, effective and consistent with national policy.
- Make reference to and carry out the Duty to Co-Operate.
- Take into account cross-border issues e.g. use of the A141 into Huntingdonshire and A142 into East Cambridgeshire.
- Need to take into account the Marine Plan for the area as due to tidal reach has an overlap on Fenland's terrestrial area.
- Additional supporting information for land submissions by a number of applicants.

- A number of references to preserve Wenny Meadow, Chatteris and make it a nature reserve and Local Green Space.
- Number of suggestions about restricting development in certain places i.e. in some settlements as well as within settlements.
- Document covers all relevant issues and is well set out based around a series of questions. Positive step by FDC.
- Form is full of loaded and ambiguous questions. Plan wasn't well publicised. Plan is daunting and FDC could have taken more innovative steps to try and gain public input. Public likely to have been put off answering so many questions and sub-questions.
- Infrastructure needs to be improved to accommodate new dwellings for the future.
- 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 local plan must support the objectives of the A47 Alliance to enhance the A47.
- 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.
- No discussion of how Local Plan policies will help Fenland district adapt to climate change. Believe climate change adaptation should be an important consideration in view of the predicted impacts of climate change on flood risk.
- Environment Agency recommends 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.
- Due to the pressures on local water resources and the potential risk of deterioration as a result of increased levels of abstraction, should aim for the highest levels of water efficiency.
- Maintaining/improving water quality is essential to avoid adverse impacts on biodiversity.
- Plan should address the impacts of air quality on the natural environment.
- Provide more biodiversity in all areas. The wildlife, more than anything else, is paramount to our future.
- Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in the NPPF. The CPRE has mapped areas.
- When assessing site allocations would urge FDC to use Natural England's Impact Risk Zones, which are available to download or through www.magic.gov.uk, to identify where development may have an impact on designated sites.
- The new 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. As such it is a superb refuge for England's biodiversity whilst also being exceptionally important for food production and as a carbon store.
- The NHS Long Term Plan and the Cambridgeshire and Peterborough Joint Health and Wellbeing Strategy once completed should be used by FDC to inform policy.
- Refer to Historic England's guidance when evaluating sites and be consistent in application. Wider archaeological and landscape/townscape impacts are important considerations and must be factored into site assessment. Cumulative impact of a number of site allocations in one location could also cause considerable harm to the historic landscape/townscape.
- Need to fully and properly consider comments made by IDBs to avoid future problems.
- Plan needs to acknowledge Anglian Water infrastructure and how this is to be maintained/upgraded by new development.
- Waste water treatment works for Doddington/Wimblington still not resolved after 8 years despite more development. Need improved infrastructure by Anglian Water.

- Flood risk policies should reflect the Fens situation.
- Council's priorities should be improvements to rail, traffic and road management.
- Access to outdoor activities are important to all fenland residents especially in Chatteris as set out in existing policy documents e.g. Growing Chatteris Masterplan.
- Seems 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.
- Small dedicated waste water processing for small new developments and reuse grey water to improve water efficiency.
- Make reference to equestrians and the considerable benefit they do/can bring to the area.
- Make reference to Neighbourhood Plans.
- Wisbech needs another river crossing, re-introduction of rail services, an additional secondary school and A47 dualling.
- Suggest an infill policy which allows for new development amongst a collection of existing buildings in locations not necessarily identified within the settlement hierarchy.
- Improving fibre connectivity is key to creating a more prosperous and sustainable Fenland, should be for all roads.
- Policy relating to Digital Infrastructure should be included. 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. Could develop this with the Connecting Cambridgeshire team.
- Better approach to telecommunications masts.
- Local plan policies must not make development uneconomic especially in a challenging viability district. Plan must be realistic.
- Hopes the greater emphasis placed on the environment strand of sustainable development compared to previous versions of Fenland's local plans translates into strong policy.
- Full understanding of district's infrastructure requirements are needed prior to proposing any sites
- Leave the established villages as they are, as they cannot support any more sewer/waste, traffic etc., and focus on land that is standing idle e.g. empty industrial areas which already have these requirements.
- Emphasis should be placed not on quantity but on quality especially quality of life. Should ask this for each development i.e. how is this going to improve the quality of life for the people living there.
- Make better use of the waterways.
- More timely and widespread meaningful road maintenance, and not only on major roads.
- Provide foot/cycleways along the A141 for safety (as in East Cambs along the A142).
- Should be consistent in climate change emergency actions. Fenland residents need to be informed about various carbon reduction programmes.
- Don't outprice dumps and recycling centres thereby encouraging fly tipping in rural areas.
- Seek opportunities for district heating.

Question 28: Your Priorities

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.

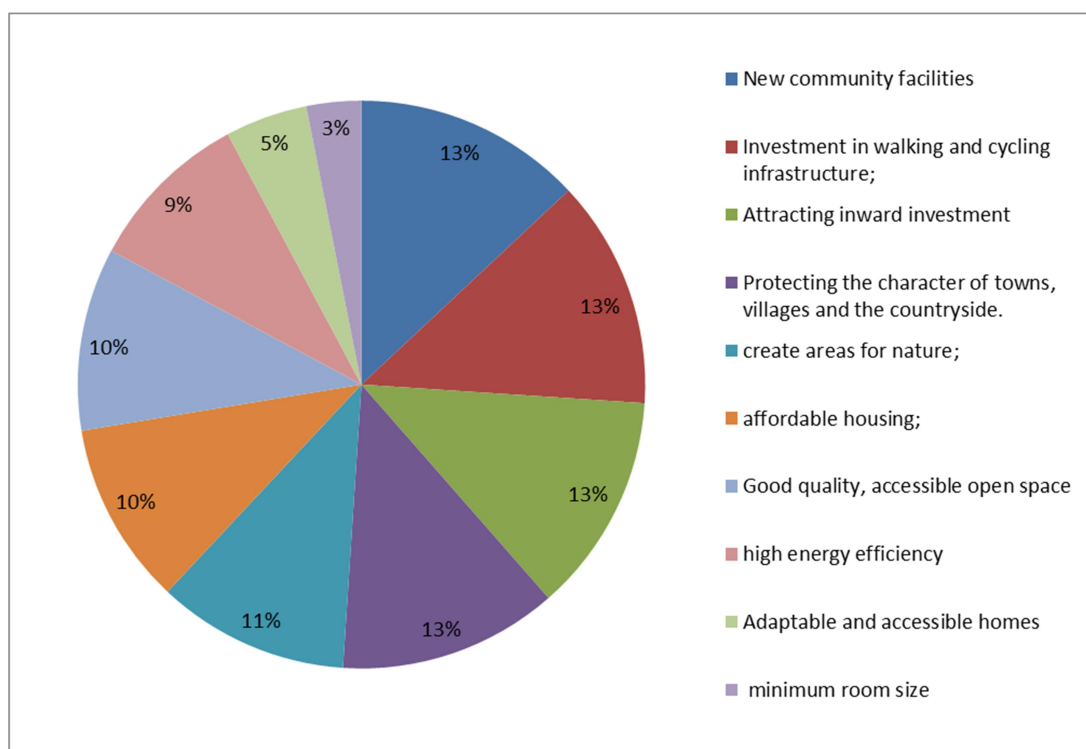
As such, we'd really welcome you completing the following question, to help us understand, overall, which issues are most important to you.

28a) What, overall, are your priorities? Please select up to five from the following list:

The following table shows how many people selected each option. A total of 46 individual responded to this

question.	
• New buildings which have high energy efficiency and/or renewable energy included, such as solar panels;	18
• More genuinely affordable housing;	20
• New homes which are easily adaptable and accessible for the disabled or elderly;	9
• New homes which have room sizes of at least a minimum set size;	6
• Attracting inward investment to Fenland and creating more jobs;	24
• New community facilities as part of a new housing area, such as community hall, corner shop, small health centre;	25
• Investment in walking and cycling infrastructure;	25
• Good quality, accessible open space (parks, play areas, etc);	20
• Genuine efforts to create areas for nature;	21
• Protecting the character of towns, villages and the countryside.	24

This shows that new community facilities and investment in walking and cycling are seen as the highest priority with a total of 25 responses. Minimum space standard for new homes is last in the list with only six responses. The results are also summarised in the following graph:



28b) Please identify any other top priorities.

26 people identified additional issues which should be taken into consideration such as:

- Housing types to meet local need
- Many priorities are linked and can be achieved by delivering more growth
- Diversity of employment opportunities
- Improved Transport Infrastructure
- Wider infrastructure such as sewers and better broadband
- Flood mitigation
- Implementation of Suds

Question 29: Neighbourhood Planning

Neighbourhood planning gives Parish and Town Councils direct power to develop a shared vision for their area and shape development and growth. Once a Neighbourhood Plan has been 'made' (adopted) it forms part of the development plan for the district, so it has the same legal status as a Local Plan which issues are most important to you.

29a) The new Fenland Local Plan must set a housing target for all Parish and Town Councils which are designated as a Neighbourhood Area. Do you have any views on what those targets should be, or how we should calculate it?

Summary of issues raised

A total of 37 comments were received for this question.

Several respondents indicated that targets for Neighbourhood Areas should be based on the government's national standard methodology (LHN) or objectively assessed needs for housing, and meeting or exceeding this target. One respondent suggested that targets could be informed by the number of households on the waiting list for affordable housing. Another respondent noted that uplift from this target could support the delivery of affordable housing.

One respondent suggested that areas should take their 'share' of the target. Another respondent suggested a top down approach is overly simplistic, and does not take account of local planning issues.

Sustainability was a key issue for several respondents, who suggested housing should be directed to the most sustainable locations, with some suggesting this could be informed by the settlement hierarchy.

The most frequently raised issue was infrastructure capacity. Many respondents indicated that housing targets for Neighbourhood Areas should be informed by available infrastructure capacity. Some respondents considered existing available infrastructure capacity a constraint to development, raising concerns that growth may place strain on existing infrastructure or result in the loss of important green spaces.

Many respondents suggested targets for Neighbourhood Areas should be informed by discussions with local communities, including residents, parish councils and community groups.

Some respondents took the opportunity to comment on the nature of the target, rather than what it should be or how it should be calculated. One respondent suggested the target should be expressed as a minimum. Another suggested it should include flexibility ("not be too specific or rigid").

Two respondents argued against the inclusion of targets. One argued that targets should not be set as some areas may not have sufficient suitable sites for development. Another suggested that levels of growth should be dictated by the market, rather than the Local Plan.

Three respondents indicated they did have a view on what targets for Neighbourhood Areas should be, or

how they should be calculated, but did not elaborate on what those views are. Several respondents indicated that they had no view on, or interest in the issue, or lacked sufficient information to respond.

29b) Should we set a housing target for all parish areas, so that a Parish or Town Council has clarity as to what level of homes are needed in their area should they wish to prepare a Neighbourhood Plan?

Summary of issues raised

The question explores whether the Local Plan should set a target for all parish areas, in the event that a Neighbourhood Plan is prepared in the future (even if a Neighbourhood Plan is not being prepared at present).

A total of 35 comments were received for this question. Of those respondents who expressed a view either way (yes/no), the majority supported a target for all parishes. There were twice as many in favour as those against.

Respondents who did not support targets for all parishes argued that such targets may be used to restrict growth. Others suggested that levels of growth should be based on availability of suitable sites.

Of those in favour, respondents argued that some settlements are already delivering housing development and can continue to do so. Others suggested such targets should be viewed as a minimum, or could be reviewed annually. Some respondents noted that targets must be set at sustainable levels, informed by infrastructure capacity.

Some respondents raised concerns that, as take up of neighbourhood planning in the district has been modest, such targets may fail to be delivered.

29c) Is there anything else this Local Plan could do to help preparation of Neighbourhood Plans?

Summary of issues raised

A total of 34 comments were received for this question. Some respondents requested FDC provide additional officer support to town and parish councils to support the preparation of Neighbourhood Plans.

One respondent suggested the Chatteris Community Plan 2018 be incorporated into the Local Plan.

Several respondents suggested that no, there is nothing further the Local Plan can do. One respondent suggested the Local Plan should 'let people decide for themselves'. These responses perhaps suggest Neighbourhood Plans should have greater autonomy from the Local Plan.

Many respondents noted the importance of consultation and engagement with town and parish councils and residents during the preparation of the Local Plan. This suggests that if the Local Plan truly reflects the views of local people, Neighbourhood Plans may not be required.

Some respondents noted a role for the Council in the implementation of Neighbourhood Plans, particularly in relation to the delivery of infrastructure and collection of developer contributions.

All comments received during the Issues and Options Consultation can be viewed on the Councils website at: <https://www.fenland.gov.uk/article/14644>