



Fenland Local Plan

# Draft Local Plan Consultation: Report on Key Issues Raised

May 2023

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# Draft Local Plan: Report on Key Issues Raised

## 1. Introduction

1.1 Consultation on the Draft Local Plan took place between 21 August and 19 October 2022. The timeframe for the production and adoption of the Fenland Local Plan is as follows:

Issues and Options Consultation	October 2019	<input checked="" type="checkbox"/>
Draft Local Plan	August 2022	<input checked="" type="checkbox"/>
Final Draft Local Plan for consultation ( 'Proposed Submission Draft Local Plan')	July 2023	
Examination of Local Plan	Autumn 2023	
Adoption of Local Plan	Spring 2024	

1.2 The Fenland Local Plan Team wishes to thank all those who took the time to comment during the Draft Local Plan consultation.

1.3 All responses received during the consultation period have been read and will be given due consideration as we prepare the proposed Submission Version of the Fenland Local Plan.

1.4 This report identifies the key issues raised during the Draft Local Plan consultation. A total of 1,407 comments were received on the Draft Plan from 498 individuals or organisations. All comments received during the consultation on the Draft Local Plan, including those submitted via post, email or online form are available to view in full at: <https://www.fenland.gov.uk/article/16566/Document-Library>

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.

## 2. Summary of key issues raised during the Draft Local Plan Consultation

2.1 This section provides a summary of key issues raised during the Draft Local Plan consultation.

2.2 **Note:** all references to section, paragraph and policy numbers are to those in the Draft Local Plan (August 2022) version of the Fenland Local Plan.

### Part A Setting the Scene

Part A Setting the Scene							
Summary of Issues							
<b>Total:</b>	<b>10</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>6</b>	<b>Neutral:</b>	<b>1</b>
<p>General comments about the draft Plan and consultation process:</p> <ul style="list-style-type: none"> <li>• Need for more public consultation on the draft Local Plan.</li> <li>• Need for better infrastructure to support growth.</li> <li>• Objection as the Plan does not meet National Policy or Duty to Co-operate requires and is unsound.</li> <li>• Some support for the draft plan as it is a comprehensive document with broad support.</li> <li>• The Plan need more support for climate change.</li> </ul>							
Section 1: Introduction							
Summary of Issues							
<b>Total:</b>	<b>7</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>3</b>
<p>Natural England</p> <ul style="list-style-type: none"> <li>• Previous advice has not been taken on board through the draft Local Plan which makes it difficult to offer further comment other than re-iterating advice already provided.</li> <li>• Weak and generic policies will deliver only limited, piecemeal improvements for the people of Fenland.</li> <li>• Plan should be revised and underpinned by ecological network mapping to develop a framework of environmental enhancement opportunities, with a focus in and around the Fens Reservoir proposal.</li> </ul> <p>Wisbech Town Council - no issues to raise; happy with the content of the Draft Plan insofar as it affects Wisbech.</p> <p>Doddington Neighbourhood Plan Group - has commenced work on producing a Neighbourhood Plan for the village to be progressed alongside the draft Local Plan.</p> <p>Other comments</p> <ul style="list-style-type: none"> <li>• Plan needs to capture the CPCA's significant ambition to double nature and its doubling nature funding and highlight the value of the two internationally important wildlife sites in the Nene and Ouse Washes Ramsar sites, as well as the SSSIs and County/Local wildlife sites, so that they are fully recognised and appreciated.</li> <li>• The Climate Change Strategic Priority needs to be expanded to include reference to the delivery of low carbon and renewable energy projects. Inconsistencies of Policies LP6 and LP18 mean FDC will not achieve the aims and objectives of the plan from a climate change perspective.</li> <li>• Plan needs to establish the current capacities of the infrastructure utilities for the proposed sites allocated and not put growth in villages where the transport and other infrastructure is already poor and not likely to be improved.</li> </ul>							
Section 2: Overarching Issues							

Summary of Issues							
<b>Total:</b>	<b>6</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>2</b>
<p>Historic England</p> <ul style="list-style-type: none"> <li>• Welcome reference to culture, heritage, the historic, built and natural environment, and Heritage at Risk. Term 'heritage assets' rather than 'historic assets' should be used in the Plan, as this is the preferred NPPF term.</li> </ul> <p>Middle Level Commissioners</p> <ul style="list-style-type: none"> <li>• Welcomes reference to Biodiversity Action Plans and Manual and suggests other MLC publications need to be included for decision making.</li> </ul> <p>British Horse Society</p> <ul style="list-style-type: none"> <li>• Provides extensive commentary about the need to address the inadequate infrastructure and facilities for equestrians in the district and highlights the potential benefits to the local economy in doing so. Horse and carriage drivers need to be considered as an integral element of 'Active Travel' alongside pedestrians and cyclists which needs to be reflected in all plan policies.</li> </ul> <p>Doddington Neighbourhood Plan Group</p> <ul style="list-style-type: none"> <li>• Not sound as the text is not justified as it lacks sufficient detail and context.</li> <li>• Not aligned with a fundamental principle of achieving sustainable development by situating housing and employment close to public transport opportunities.</li> <li>• Access to health services within the district (including within Doddington) is often difficult to achieve and many residents rely upon public transport to reach destinations.</li> <li>• Important that new housing and jobs are focussed in locations with the best access to public transport. Currently shrinking public transport provision in Doddington.</li> <li>• New developments need to be located in the market towns where better public transport and services exist.</li> </ul>							
Section 3: Our Vision							
Summary of Issues							
<b>Total:</b>	<b>12</b>	<b>Support:</b>	<b>4</b>	<b>Object:</b>	<b>7</b>	<b>Neutral:</b>	<b>1</b>
<p>National Highways</p> <ul style="list-style-type: none"> <li>• Whilst principal interest is safeguarding the operation of the A47 are supportive of the aims to reduce the reliance on private motor vehicles and encourage more sustainable transport modes such as walking, cycling and public transport and contribute to the safety of all highway users.</li> </ul> <p>Historic England</p> <ul style="list-style-type: none"> <li>• Welcome reference to the historic environment within the vision.</li> </ul> <p>Natural England</p> <ul style="list-style-type: none"> <li>• Disappointing that Fenland's unique natural environment - the fens landscape, its ecology and lowland peat resource - are not central to the Plan's vision and objectives.</li> <li>• Vision for Fenland's natural environment should be significantly more ambitious and strategic.</li> <li>• Enhancement of the natural environment, embedded in policies in the Plan, could help stimulate investment in the district and drive social and economic development.</li> </ul> <p>Doddington Neighbourhood Plan Group</p> <ul style="list-style-type: none"> <li>• Vision is not achievable due to the amount of new housing which is proposed to be delivered within Fenland villages, including Doddington.</li> <li>• Not sufficient, justified and objective evidence for the growth suggested in Doddington. Development needs to be soundly planned with appropriate infrastructure in place to support</li> </ul>							

existing and future residents.

- Not sound as the text is not justified as it lacks sufficient detail and context.
- Not aligned with a fundamental principle of achieving sustainable development by situating housing and employment close to public transport opportunities.

Anglian Water Services

- Disappointed the vision does not include reference to the over-arching issue of mitigating for and adapting to the impacts of climate change, the long-term approach to becoming net zero, and what that means in relation to achieving sustainable and resilient growth in Fenland.
- Vision should articulate the collaborative work of 'The Future Fens Integrated Adaptation Project' which aims to holistically address the impact of climate change; the significant challenges in the Fens include sea-level rise, flooding and drought.

Other comments:

- Vision needs an up-to-date Local Housing Need figure of at least 10,564.
- Housing number should not be a limit, rather an 'at least' figure should be given and provided throughout the plan.
- Concerned housing figures consider existing planning permissions, some of which have already commenced and therefore does not represent what is proposed to be achieved. As such it reduces the opportunity for new housing.
- Minimum jobs target of 18,000 and significant land allocation to employment uses is strongly supported.
- Insufficient recognition given to the East of England Ambulance Service NHS Trust (EEAST) as an essential social infrastructure provider – request changes.

**Section 4: Our Objectives**

**Summary of Issues**

<b>Total:</b>	<b>10</b>	<b>Support:</b>	<b>3</b>	<b>Object:</b>	<b>4</b>	<b>Neutral:</b>	<b>3</b>
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The was a relatively even response to this section. Support came from the Environment Agency, Historic England and the Wildlife Trust with some minor changes requested.

RSPB

- Suggests an additional objective at 8.4: 'Reduce carbon emissions from loss of peat soils associated with development'. Justification – development on peat soils needs to ensure there is no loss of this carbon resource.

Anglian Water

- Support many of the Sustainability Objectives, although these are not clearly articulated in the Vision.
- For Objective 4.2 (Create places, spaces and buildings that are attractive and well-designed etc) need design guidance and codes that include integrated water management to include encouraging water neutrality, assisting with demand reduction, and having water efficient homes.
- Objective 5.1 (Limit or reduce vulnerability to the effects of climate change), needs to recognise that climate change is a key challenge and FDC's approach to the spatial distribution of growth must include opportunities to reduce the capital (embedded) and operational carbon from new homes and businesses as well as the infrastructure required to support this.

Other comments

- FDC's Sustainability Appraisal Scoping Report: October 2019, highlights Fenland is ranked the 80th most deprived authority out of 319 in England. Wisbech and North Fenland are the worst areas and significantly worse than the England (and Cambridgeshire) average. However, the Local Plan does not address this terrible situation.

- To satisfy Objective 3 (Transport) additional allocations need to be made in the market towns, including in March and Wisbech, to direct development to locations where travel by sustainable modes of transport is a more realistic option.
- To satisfy Objective 2 (Jobs, Education and Housing) more sites need to be allocated in suitable locations in to meet the full need for affordable housing.
- Insufficient recognition given to the East of England Ambulance Service NHS Trust (EEAST) as an essential social infrastructure provider – request changes.

## Part B – The Spatial Strategy

Part B – The Spatial Strategy							
Summary of Issues							
<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>3</b>
<ul style="list-style-type: none"> <li>• Concerns raised about increasing population and access to Doctors Surgeries.</li> <li>• Impact of growth proposed towards the south of the district on the transport network especially the A142.</li> </ul>							
Section 5: Local Plan Growth Strategy							
Summary of Issues							
<b>Total:</b>	<b>7</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>5</b>	<b>Neutral:</b>	<b>1</b>
<ul style="list-style-type: none"> <li>• Support for more economic growth and the national importance of the agricultural and food processing industries for the district.</li> <li>• Some objections to the proposed level of growth as no need.</li> <li>• The Plan should not use a different Local Housing Need (LHN) figure for the first year (2021), this should be based on 2022 figures.</li> <li>• The Local Plan should over allocate sites by 20%</li> <li>• The level of the buffer of sites should be clarified, as different figures used in supporting text and policy.</li> <li>• There is general support for a strategy that targets most growth to the market towns and sustainable locations.</li> <li>• Suggestion that the five-year land supply should be recalculated based on updated LHN figures.</li> </ul>							
Section 6: Settlement Hierarchy							
Summary of Issues							
<b>Total:</b>	<b>6</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>2</b>
<ul style="list-style-type: none"> <li>• There is support for reintroduction of settlement boundaries.</li> <li>• Questions raised over growth strategy with medium villages such as Coates allocated more housing and employment than other larger villages.</li> <li>• Some objections to the provision of more executive homes, as large houses look out of place in small villages with cottages and bungalows.</li> <li>• Should the policy reinforce the linear pattern of development, particularly regarding transport and sustainability and creating cohesive communities.</li> <li>• Concerns raised that the term ‘Settlement Hinterland’ is open to interpretation and could be used out of context. The definition in the draft plan is hard to understand and not clear. Therefore this policy is unsound as not justified and not effective.</li> <li>• Concerns that the unique Fenland landscape and the distinct settlement patterns of its villages will become a thing of the past.</li> </ul>							
Policy LP1: Settlement Hierarchy							

## Summary of Issues

<b>Total:</b>	54	<b>Support:</b>	17	<b>Object:</b>	33	<b>Neutral:</b>	4
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### Part A - Settlement Hierarchy

#### General comments

- General support for the four Market Towns as most suitable and sustainable locations for growth
- Support for the strategic approach and the use of a settlement hierarchy as a guide to the distribution growth.
- Some support for the settlement hierarchy methodology and evidence base
- There was some limited support for changes to titles of level of the hierarchy
- Some objections changes to settlement hierarchy categories as preference to the existing term growth village.

#### Position of the Settlement Hierarchy

Comments submitted objecting to the position of the following settlements:

- Parson Drove should not be classified as a Medium Village as it has poor services and facilities and public transport, therefore should be classified as Small Village A
- Leverington is not a Medium Village it has always been classified as low.
- Doddington is a large village but has constraints that should limit the amount of growth, such as lack of useable sewage facilities and lack of public transport
- Guyhirn should be moved up the hierarchy as it has better transport links and can support growth
- Thorney Toll should be included in the settlement hierarchy.
- Newton on the Isle should be classified as Small Village A in terms of population

### Part B Settlement Boundaries

- General support for the reintroduction of settlement boundaries over the current criteria based approach, as this provides more certainty.
- Support as current plan does not have settlement boundaries which has resulted in unwelcome development.
- Some concerns raised that the approach to settlement boundaries is overly restrictive, and that without growth some villages services and facilities will be lost
- Concerns that settlement boundaries have been drawn too tight and are restrictive
- For some Market Towns the settlement boundaries remove land currently allocated in the adopted Local Plan.
- There are many examples of boundaries that do not include recent planning permissions.
- Suggestion that additional text should be added to the policy for development within defined boundaries to include reference to sensitive locations such as conservation areas of near to listed buildings, registered parks and gardens and scheduled monuments.

Specific objections and amendments received to the boundaries of the following settlements:

- Murrow – to include additional building land
- Tydd St Giles
- March
- Turves
- Doddington – too much growth



### Part C – Frontage Infill Development

- Significant objections to Part C of policy LP1 and the introduction of the term ‘hinterland’
- Some views that this policy is contradictory. Part B controlled by settlement boundary then part C sweeps away these restrictions, making the policy unworkable.
- Policy LP1 is against the NPPF and requirements to protect the countryside. Part C of the policy should be removed as unsound.
- Policy does not align with Neighbourhood Plans
- Concerns wording of Part C and frontage policy could be abused, as it is unclear and open to interpretation and too ambiguous and subjective
- Leaves planning process open to abuse and countryside under threat and lead to over development in the countryside
- Frontage development in turn will then lead to more infill development, and loss of important gaps between settlements
- Concerns about allowing ribbon development by watercourses

Some support for Part C:

- Some support for policy from small medium house builders as a way to extend the village and maintain the rural character.
- Suggestion that Part C meets NPPF requirement for windfall sites.
- Support approach and flexibility
- Suggested changes to opening paragraph to ensure that land is adjacent to the highway
- Suggestion that policy should be extended to allow sites of 1ha

### Section 7: Growth Strategy

#### Summary of Issues

<b>Total:</b>	<b>6</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>2</b>
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- Support for economic growth
- Concerns about viability and if growth targets can be met.
- Need for more infrastructure to meet growth.
- More growth required in the Market Towns
- Less growth in Doddington - proposed is same amount as the Market Town of Whittlesey.
- Plan should identify jobs shortfall.

### Policy LP2: Spatial Strategy for the Location of Residential Development

#### Summary of Issues

<b>Total:</b>	<b>36</b>	<b>Support:</b>	<b>6</b>	<b>Object:</b>	<b>27</b>	<b>Neutral:</b>	<b>3</b>
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Various comments received both supporting and objecting to the spatial strategy set out in Policy LP2 including:

General comments:

- Some support for growth strategy, by focusing growth to sustainable market towns, but allowing growth in rural areas to support local services and facilities.
- Growth Strategy does not deliver proportionate growth across the district. E.g. Wisbech, Whittlesey, Doddington and Coates
- The growth target is not a maximum target it is a minimum requirement, need for more growth, justification for a higher housing target.

- Suggestion that the growth target does not take into account any upward adjustment to meet affordable housing.
- Several comments relating to the buffer of sites and that this is too small and limits flexibility. It is noted that there are inconsistencies with the figures and information about the buffer throughout the plan. This causes confusion.
- Concerns about the lack of evidence to support 1,500 dwellings as windfall development.
- Past delivery of new housing since 2011 should be taken into consideration in the distribution of growth.
- Growth must include infrastructure such as schools, doctors, buses and more job opportunities.
- Growth strategy must be informed by need for infrastructure, such as transport and water.
- Concerns raised about high levels of growth towards the south of the district and impacts along the A141 corridor A142.
- The proposed growth for settlements is based on allocations, and not on an understanding of need for each settlement.
- Policy should set a target for Neighbourhood Plans, otherwise the policy undermines the opportunity for neighbourhood plans. How will additional allocations in a NP be dealt with?
- Concerns about level of growth in some settlements, especially the proposed reduction in bus services, in places such as Chatteris.

Settlement Specific comments:

- Suggestion that the Market Towns can accommodate more growth.
- Questions about the reduction of growth proposed to Wisbech, the largest town, compared to the adopted Local Plan. No justification for this change.
- Level of growth in Whittlesey is too low, more growth supported by the emerging Neighbourhood Plan.
- Questions raised about level of growth proposed in Doddington when compared to other large villages, it is not proportionate when compared to Whittlesey, especially given the known constraints.
- Questions raised about level and proportion of growth in Coates, as a medium village this settlement gets more growth than larger villages.

**Policy LP3: Employment Development**

**Summary of Issues**

<b>Total:</b>	<b>10</b>	<b>Support:</b>	<b>4</b>	<b>Object:</b>	<b>5</b>	<b>Neutral:</b>	<b>1</b>
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Various comments received both supporting and objecting to the spatial strategy set out in Policy LP3 for employment including:

- Some support as the strategy focuses growth within the market towns and supports sustainability reducing the need to travel.
- Support for the strategy as this will attract future business and investment in the area.
- The policy needs a more flexible approach to attract new business and job opportunities, helping to meet the CPCA's ambition to double economic outputs.
- Concerns raised as there appears no relationship between the housing growth strategy and employment. For example, Wisbech 12% of housing growth and 42% of employment growth
- Concerns that Whittlesey only has 6% of employment growth and more employment land is needed. This has not matched the housing growth in recent years and has resulted in high levels of out commuting.
- Concerns about additional 100ha of employment land above the Local Plan requirement towards the south of the district. The broad locations have potential to detrimentally impact on employment growth and transport infrastructure for adjoining districts.
- Concerns about lack of employment land allocated and job opportunities in Doddington.

<b>Section 8: Securing Fenland's Future</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>3</b>
<ul style="list-style-type: none"> <li>• Some support for policies in the plan that protect and enhance the rights of way network promoting walking, cycling and riding.</li> <li>• Active travel provision should include horse riding and support equestrian industry.</li> <li>• The proposed new reservoir will provide fresh opportunities for new public rights of way.</li> <li>• The policy should include reference to the Future Fens baseline report (Future Fens - Flood Risk Management and the Future Fens: Integrated Adaptation Project (FF:IA) as both highlight the future challenges for the fens landscape in terms of climate resilience.</li> <li>• The plan should refer to reducing the amount and environmental impact of waste produced.</li> </ul>							
<b>Policy LP4: Securing Fenland's Future</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>11</b>	<b>Support:</b>	<b>3</b>	<b>Object:</b>	<b>6</b>	<b>Neutral:</b>	<b>2</b>
<ul style="list-style-type: none"> <li>• Some support for this policy as it is expected to contribute towards meeting national legislative requirements to ensure that development contributes to the mitigation of and adaptation to climate change.</li> <li>• Concerns raised that the policy does not state what FDC will do to mitigate the effects of climate change.</li> <li>• Policy must support enhancement of public rights of way network must include reference to equestrian access and improving a access routes for horse ridding</li> <li>• Suggestion that the Policy must refer to the NPPF paragraphs 152 to contribute towards “radical reductions” in greenhouse gas emissions (rather than just ‘minimisation’), to ensure that development and use of land contributes towards the legally binding requirement of emissions in the UK to become net zero by 2050.</li> <li>• Suggestion that the policy should reference the Future Fens: Integrated Adaptation (FF:IA) the main aims of which are to address three key risks to the area arising from climate change: flooding, drought, and risks to flood security.</li> <li>• Policies should include quantitative and qualitative requirements if they are to be deliver meaningful benefits. This is particularly important with regard to accessible green infrastructure and BNG – opportunities for delivery through development should be mapped alongside the existing GI / ecological network. Please see our further comments above.</li> <li>•</li> </ul>							

## Part C – The Polices

<b>Section 9: The Polices</b>							
<b>Summary of Issues</b>							
<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
No comments received.							
<b>Section 10: Health and Wellbeing</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>7</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>3</b>

Public Health (Cambridgeshire County Council)

- Request a Health Impact Assessment (HIA) policy to be supported by an assessment of the impacts on human health.
- Need to reference 'Joint Cambridgeshire and Peterborough Health and Wellbeing Strategy' as per the NPPF/NPPG requirements.
- Highlight the impact of cold and overheating homes on human health.
- Unclear how the need to balance the viability of development with the provision of much needed affordable housing in Fenland will be achieved.
- General poorer health of Gypsies and Travellers should be recognised.
- For town centres (LP16) should include reference to walking and cycling
- For LP17 (Culture, Leisure, Tourism and Community Facilities) clarification on the term "reasonable proximity" is needed as well as reference to 'community health facilities'.
- Air Quality policy and text should be more robust.

Other comments

- Welcome acknowledgement that the Local Plan can play a key role helping achieve one of FDC's corporate objectives to 'Promote health and wellbeing for all'.
- Need policies that will ensure new development will support and encourage healthy lifestyles and meet the NPPF aim to 'achieve healthy, inclusive and safe places'.
- Impacts of proposed development on the wider determinants of health should be assessed at the earliest stage of the design process.
- 'Active Design' by Sport England and supported by Public Health England, provides a set of principles for enabling active and healthy lifestyles; needs referencing by developers when preparing planning applications.
- The improvement and enhancement of the Rights of Way network to at least bridleway standard will contribute to many of the highlighted objectives.
- Term 'Active Travel' needs to be used throughout the documents so as to include equestrians as well as cyclists and pedestrians.
- One of the many benefits of Fenland is that the extensive, flat expanse with big skies convey a strong sense of place, tranquillity and inspiration.
- Need to further emphasise 'blue spaces' as well as 'green spaces' due to their health and wellbeing benefits.
- Need to develop walking and cycling routes around the market towns.
- Role of East of England Ambulance Service NHS Trust (EEAST) as an essential social infrastructure provider should be acknowledged.

**Policy LP5: Health and Wellbeing**

**Summary of Issues**

<b>Total:</b>	<b>22</b>	<b>Support:</b>	<b>10</b>	<b>Object:</b>	<b>8</b>	<b>Neutral:</b>	<b>4</b>
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Natural England

- Policy should recognise the importance of accessible open space for people's health and wellbeing and the deficit in this crucial resource across the district.
- Unlikely proposed policies will achieve significant enhancements in open space and GI provision.
- Evidence is needed through ecological network mapping and an associated Green Infrastructure Strategy to identify specific projects to provide transformational opportunities for Fenland's residents.

Sport England

- Policy needs to encourage access to sports facilities and also promote open space and green infrastructure to promote opportunities for walking and cycling.

Public Health (Cambridgeshire County Council)

- Need to highlight importance of delivering community infrastructure at an early stage of a development to prevent adverse impacts on health and wellbeing.
- Need a separate policy on the control of fast-food outlets as there is a strong relationship between spatial planning and the wider determinants of health.

Doddington PC

- Surgery is at capacity, car park is inadequate leading to traffic disruption and there is no public transport to access services elsewhere.

Doddington Neighbourhood Plan Group

- Doddington has insufficient health and wellbeing facilities to accommodate the proposed level of housing growth within the village.
- Existing facilities may be capable of very limited expansion to fulfil immediate needs but the scale of the additional housing proposed is very likely to create substantial deficits in infrastructure.
- Evidence is needed to show how facilities will be delivered for the proposed housing growth.
- As such LP5 is not sound or justified by evidence.

Other comments

- Provision of health care facilities are of utmost importance alongside homes and business developments.
- To better support health and wellbeing there needs to be an improvement in the facilities provided within Fenland e.g. March Bears Rugby Club.
- Equestrian access needs to be encouraged and included in all access proposals as part of sharing with pedestrians and cyclists.
- Health-related criteria are generally supported - without being unduly prescriptive.
- Need to develop walking and cycling routes around the market towns.
- Wenny Meadow in Chatteris as a natural green space provides many health and well-being benefits.

**Section 11: Renewable Energy**

**Summary of Issues**

<b>Total:</b>	<b>6</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>2</b>
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Historic England

- No evidence base to support the allocation of the two sites for medium to large scale wind turbine development at Coldham and Elm. Would expect any allocation to be based on an assessment of areas of potential for wind turbines. The assessment should include consideration of the historic environment including identification of heritage assets, and their settings, in the area.
- Concerned about approach to allocate the whole of the district for small to medium size domestic and non-commercial wind turbines does not accord with NPPF para 155 which implies 'identifying suitable areas' rather than everywhere.

Cambridgeshire County Council

- Disappointing that the whole of the district is not 'allocated' as 'potentially' suitable for medium to large scale wind energy development. This puts unnecessary barriers to further development of this low carbon, low-cost technology.

Middle Level Commissioners

- Need to consider location of the nearest appropriate grid early in the process to avoid past problems. E.g. road layouts and alignments to accommodate the specialist haulage vehicles, and cable routes.

- Standalone turbines should be placed outside of the fallover/topple distance of a protected watercourse, pumping station, water control including navigation structures or other assets and no blades should over sail a protected watercourse or its associated maintenance access strip.

Other comments:

- Weak policy as the plan rules out any large-scale developments because no Neighbourhood Plan has yet identified any suitable sites. Policy should leave options open so that if a NP comes up with a suitable site for large scale wind farm development, then this will be positively considered.
- Positive wording should be expanded so that significant weight will be given to the additional benefits when considering planning applications for low carbon and renewable energy developments.
- Section may need updating if recent government announcements on planning relaxations for on-shore wind turbines are confirmed
- Would welcome further on-shore wind turbines in Fenland providing the sites and the numbers are carefully chosen.
- Should include details of the urgency for which more solar energy proposals are needed to ensure this is positively planned in line with national policy targets.

## Policy LP6: Renewable and Low Carbon Energy Infrastructure

### Summary of Issues

<b>Total:</b>	<b>12</b>	<b>Support:</b>	<b>6</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>3</b>
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#### Historic England

- Two allocations for wind turbines do not appear to have been based on evidence.
- Also concerned the whole of the district is allocated for smaller scale wind turbines.
- Such allocations should be based on appropriate assessment, including of the historic environment – see HE advice Note 15 on ‘Commercial Renewable Energy Development and the Historic Environment’ - all heritage assets in the area should be identified, arbitrary distance measurements avoided, and the setting of heritage assets should be included. At present the evidence base is incomplete.

#### Natural England

- Fenland is particularly sensitive to wind turbine development due to potential impacts on birds associated with the Nene Washes Special Protection Area (SPA) and Ramsar site, and the Ouse Washes SPA and Ramsar site. Inappropriately located wind turbines pose a potential risk to these and other birds and wildlife through collision, disturbance and displacement.
- Will require significant evidence and safeguarding to ensure wind turbines are in appropriate locations.

#### RSPB

- Support wording regarding the need for appropriate baseline data, and if necessary, assessment under the Habitats Regulations for new wind energy development in proposed locations, due to the sensitivity to collision risk of Special Protection Area wintering wildfowl.

#### Cambridgeshire County Council

- Part A should be amended so that a larger area is allocated as potentially acceptable for medium to large wind turbines, preferably by allocating the whole of Fenland and allowing future proposals to be considered on their own merits.
- Part A d) - Policy currently only applies to existing buildings, but to optimize opportunities this should be extended to new buildings.

#### Hunts District Council

- Support policy as a proportionate approach; the specific proposed allocations for medium to large

scale wind turbine developments are a significant distance from Huntingdonshire’s boundary with Fenland and therefore will not have any visual or landscape implications for this district.

Anglian Water

- Policy aligns with AW’s own ambition to become a net zero business by 2030 and reduce capital carbon by 70% but want a more flexible criteria-based policy for the erection of large-scale wind turbines.
- Needs to be clear landscape principles set around onshore wind development; the evidence used to identify the sites is not apparent and criteria would be difficult to meet unless turbines already exist in the location.

Other comments:

- Renewable energy infrastructure should be encouraged both as standalone developments and within proposed developments, with solar panels mandatory in all new-build developments, including in Policy LP7 (Design).
- No need to include ‘townscape’ within the policy.
- Part b) fails to meet all four tests of soundness as set out in paragraph 35 of the NPPF. Not specific enough as currently drafted and needs to specify what impacts renewable energy proposals can potentially have on aviation and navigation systems/ communications.
- Part C - as solar developments are subject to planning conditions which require the facilities to be decommissioned, there is no need or requirement to include this part and it should be deleted.
- Sub-para e) (Best and Most Versatile land) needs amending to avoid blocking needed renewable energy schemes. Implies a blanket ban on solar farms in the district and is counter intuitive and as such does not conform with national guidance and is unsound as drafted.

**Section 12: Design**

**Summary of Issues**

<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
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No comments received.

**Policy LP7 Design**

**Summary of Issues**

<b>Total:</b>	<b>20</b>	<b>Support:</b>	<b>5</b>	<b>Object:</b>	<b>10</b>	<b>Neutral:</b>	<b>5</b>
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Environment Agency

- Important to include flood risk within the design principals (including suitable surface water disposal) as this plays a significant role, particularly in areas which are at a residual risk and, for example, may need to set finished floor levels at an appropriate height.

Historic England

- Welcome reference to local character, landscape and townscape in Parts A – C, but could be clearer in regard to building heights. Refer to: HE Advice Note 4 – tall buildings (March 2022).

Natural England

- Welcomes reference to the National Design Guide and that a specific Design Code will be developed for Fenland through an SPD. Should also reference Natural Cambridgeshire’s ‘Developing with Nature Toolkit’ and Natural England’s ‘Accessible Natural Greenspace Guidance’.
- Supports aspiration towards water neutrality by meeting high water efficiency standards of 110 litres per person per day, and facilities to recycle, harvest and conserve water resources in Policy LP32 - Flood and Water Management.

Sport England

- Policy needs to refer to Sport England’s ‘Active Design’ to encourage physical activity such as walking and cycling.

RSPB

- Part E Nature - Unclear what ‘sufficiently green’ means. Refer to NHBC Foundation guidance ‘Biodiversity in New Housing Developments’ as a yardstick.

Cambridgeshire County Council

- Part H – amend to ensure new homes and buildings have low carbon heating systems (wherever technically feasible) and rooftop solar PV.
- New dwellings to be adaptable and “retrofit ready”, such as providing physical space to install heat pumps.
- Should not be connected to the gas network or have fossil fuel heating of any type unless shown that heat pumps are not technically feasible for the site.

Middle Level Commissioners

- Part E: Nature - a) must be re-worded to include open watercourses as this will provide green and wildlife corridors which will benefit the urban environment.
- Part H: Homes and Buildings - growth and development need to consider the whole water cycle process, giving serious consideration to reducing water usage.
- Need to refer to other water resource issues within Fenland i.e. abstraction to irrigate crops, maintenance of navigation levels, deterioration of water quality and the aquatic environment, and amenity.

Anglian Water

- Part E Nature - should be retitled ‘Green Infrastructure’, to highlight the multi-functional benefits of green infrastructure led design.
- Part H - aspiration for water neutrality would be better in LP32: Flood and Water Management
- Would encourage FDC to go further on the 110 litre pppd requirement, particularly on strategic sites, and include measures such as rainwater harvesting and greywater reuse.
- Amended policy should refer to the Building Regulations to allow consistency with future changes.
- Needs to also refer to non-domestic water efficiency measure especially with the amount of employment development planned.

Other comments:

- Policy should be amended to contain support for the approved Broad Concept Plans, such as that created for ‘West March’, as this will ensure continuity and limit the need to amend or update the approved BCPs This would accord with NPPF (Paragraph 127).
- Policy should not be overly prescriptive and must include a degree of flexibility to allow schemes to respond to site specific requirements and the character of the local area.
- LP7(e): Design (Nature) – should not focus on individual features. Needs to refer to ‘a preference in favour of the retention, improvement, and creation of “clusters” of habitat features and mosaics of different habitat types.’
- Advertisements should also be included.
- General support for 110 litres per person per day requirement.
- Given known viability issues in Fenland unclear how water resource measures will be implemented/ enforced.
- Point g) – Unclear if the 30m guidance for collecting bins will remain due to recent appeal decision.
- Lack of equestrian facilities and access which needs to be addressed in the policy.
- Use of term ‘Active Travel’ should be used throughout the document.
- Part E: Nature and Part F: Public Spaces – Needs to include protection and enhancement of the rights of way network to at least bridleway standard.



<b>Policy LP8: Amenity Provision</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>7</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>3</b>
<p>Whilst there was general support for the policy amendments were requested to several criteria:</p> <ul style="list-style-type: none"> <li>• Request that part c of the policy is re-worded to ensure accordance with the NPPF (Paragraph 185) and to be sound in planning terms.</li> <li>• Criteria c) – should include an exception for ‘noise/vibration levels’ during the course of construction.</li> <li>• Criteria j) – unclear how ‘well designed and located private amenity space’ will be measured. This is a very ambiguous statement; more guidance is needed.</li> <li>• Criteria k) - needs to consider how waste collection vehicles reach properties as well as turning points.</li> <li>• Amenity provision shouldn’t impact on existing occupiers.</li> <li>• Building of new housing at Wenny Meadow, Chatteris will permanently destroy a valuable local amenity used and loved by generations of residents and deprive future generations of its magic.</li> </ul>							
<b>Policy LP9: Residential Annexes</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>2</b>
<p>Environment Agency</p> <p>Residential annexes are typically single storey extensions with ground floor sleeping accommodation which are vulnerable to flood risk. Sites within areas at risk of flooding should be supported by a Detailed Flood Risk Assessment to ensure the development remains safe for any future occupiers.</p> <p>Other comments:</p> <ul style="list-style-type: none"> <li>• Annexe may trigger need for additional parking in accordance with other Plan policies and therefore may not be practical to share parking spaces with the host dwelling.</li> <li>• Unclear how FDC expects how an annexe cannot reasonably be provided through an extension to the original dwelling will be indicated.</li> <li>• Criteria for residential annexes are sensible.</li> </ul>							
<b>Policy LP10 Shop Frontages, Security Shutters and Canopies</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>
<p>Historic England</p> <ul style="list-style-type: none"> <li>• Retention of original/historic or significant shopfronts elements are often integral to the character of these buildings and that of the wider street scene. Policy needs to highlight the importance of retaining or restoring historic shopfront features in terms of the character of an area and the economic benefits of providing traditional and bespoke shopping units. See example of restoration of Victorian and Edwardian shops in the Strand, Derby.</li> </ul>							
<b>Policy LP11: Community Safety</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>1</b>
<p>Cambridgeshire County Council</p> <ul style="list-style-type: none"> <li>• Policy relating to crime is supported, but there is no standard set on which to judge an application which should be provided. Need to reference “secure by design” standard in the actual policy not just supporting text.</li> </ul>							

Middle Level Commissioners

- (Also for LP21 - Public Rights of Way) – agree that community safety should be a priority when planning new developments. In some instances, informal walking routes, particularly within areas of open space are more appropriately not lit to minimise impact upon ecology. Where possible footpaths, cycleways, street lighting and/or other street furniture should be positioned outside of any protected watercourse and the associated maintenance access strip. May require prior written consent of either the MLC or associated IDB. Seek minor changes to wording.

**Section 13 Housing**

**Summary of Issues**

<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>1</b>
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- The allocations of sites, make no refence to affordable housing.
- Quality of housing needs improving
- Concerns about infrastructure to support housing growth especially need for doctors’ surgeries.
- The plan should specifically identify the need for older peoples housing. The Council’s housing need report provides the evidence that 21% of the districts housing need if specialists housing for older people. Elderly person accommodation whether purpose built housing or residential care homes can also assist in freeing up housing for younger people and families.

**Policy LP12: Meeting Housing Needs**

**Summary of Issues**

<b>Total:</b>	<b>21</b>	<b>Support:</b>	<b>3</b>	<b>Object:</b>	<b>14</b>	<b>Neutral:</b>	<b>4</b>
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Various comments received both supporting and objecting to the Policy LP12, including:

**Part A – Housing Mix**

- General support for housing mix as required by NPPF.
- Need for more older people accommodation.
- Housing mix should take into account flood risk and requirements for single story dwellings.

**Part B – Affordable Housing**

**Support:**

- Some support for affordable housing requirement
- Affordable housing requirement is considered to be appropriate and is considered to provide a suitable balance between meeting the identified housing needs of the district, whilst also ensuring that sites remain fully viable in planning terms.
- Support for division of the district into two areas for affordable housing provision. It is appropriate and based on market evidence.

**Objections:**

- Viability Study is out of date, affordable housing requirement must be reviewed.
- Poor history of delivery of affordable housing, therefore more affordable housing required.
- Concerns affordable housing requirement won’t be met,
- Evidence shows that the affordable housing need is over 50% of the annual Local plan target.
- Affordable housing requirement should be reviewed to take account of need and up to date viability assessment.
- It is suggested that the plan should therefore allocate more land to meet identified affordable

housing need.

### **Part C – Exception Sites/First Home Exception sites and Rural Exception Sites**

- Exceptions sites should include a criterion that any application should be supported by the parish council.

### **Part D – Homes for Older People**

- With ageing population there is more need for specialist older people accommodation
- The Council’s own evidence base demonstrates the need for 21% older people accommodation. Policies should reflect the evidence.
- It is suggested that the plan should allocate sites specifically for older people accommodation.
- The Plan should include monitoring requirements to assess the need.

### **Part E – Accommodation for Vulnerable People**

- Concerns about flood risk restricting access to properties.

### **Part F – Dwellings with Higher Access Standards**

- Concerns about viability
- No justification for the requirement for M4(2) dwellings.
- The policy will need updating to take into account the governments consultation regarding raising accessibility standards for new homes and changes to building regulations.
- Due to ageing population the policy should extend the requirements for Part M4(3) to all properties, not just affordable rented sector.
- Concerns that current target for M4(3) dwellings will only apply on sites of 100 dwellings or more.
- Suggestions that the policy should include the requirement for minimum room sizes.

### **Part G - Homes for Permanent Caravan Dwellers/Park Homes and Boat Dwellers**

- Concerns about mobile homes in the countryside as they are classified as more vulnerable in flood risk terms, the policy should make this clear.

### **Other comments**

- No evidence to support need for 5% self-build on sites of 100 dwellings or more, as latest evidence shows oversupply of self-build sites.
- Policy LP12 covers too many issues and should be broken down.
- Viability study and the update note (May 2022) are out of date. Policy needs updating to take into account increase build cost and rising inflation.

## **Policy LP13: Custom and Self Build**

### **Summary of Issues**

<b>Total:</b>	<b>7</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>5</b>	<b>Neutral:</b>	<b>0</b>
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- No allocations or identification on the policies map for infill frontage development
- Support for policy in line with current government guidance
- No evidence to justify large scale development (100 + dwellings) to provide self-build plots.
- Need for more windfall and self-build infill plots to meet demand.

<b>Policy LP:14 Gypsy and Travelling Showpeople</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>6</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>3</b>
<ul style="list-style-type: none"> <li>• The Gypsy and Traveller Accommodation Needs assessment must be completed.</li> <li>• Policy should be amended to ensure the site is capable of being served by waste collection services.</li> </ul>							
<b>Section 14: Employment</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>0</b>
<ul style="list-style-type: none"> <li>• Policy must reflect that some rural businesses need to be located outside of defined employment areas. such as Agri-food, Horticulture, equestrian industry and Tourism, may justifiably require a countryside location in accordance with policy LP18 Development in the countryside</li> </ul>							
<b>Policy LP15: Employment</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>10</b>	<b>Support:</b>	<b>5</b>	<b>Object:</b>	<b>4</b>	<b>Neutral:</b>	<b>1</b>
<ul style="list-style-type: none"> <li>• Some general support for the policy and the ambitions to attract new business, jobs and growth whilst supporting existing businesses.</li> <li>• Some support for employment sites</li> <li>• Concerns that the policy does not address the needs for small businesses.</li> <li>• Policy does not address home working.</li> <li>• Objection to reference to use class E(g).</li> <li>• List of established employment areas is incomplete for example Leverington Road Distribution depot, Lynn Road / Mount Pleasant factory area are excluded.</li> </ul>							
<b>Section 15: Town Centres</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>
<ul style="list-style-type: none"> <li>• Threshold in respect of the requirement for a Retail Impact Assessment should be increased to 1,000 sqm (draft proposes 500 sqm which is too low). Increase is more in line with National Policy threshold of 2,500 sqm.</li> </ul>							
<b>Policy LP16: Town Centres</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>8</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>6</b>	<b>Neutral:</b>	<b>2</b>
<ul style="list-style-type: none"> <li>• The LP acknowledges shopping habits have changed but the policy does not have a vision of what the Fenland town centres should look like. This should be proactively tackled by the policy not just left to developers.</li> <li>• The threshold in respect of requirement for a Retail Impact Assessment should be increased to 1,000 sqm (draft LP proposes 500 sqm which is too low). This increase would be more in line with the National Policy threshold of 2,500 sqm.</li> <li>• More improvements to the river settings and corridors would enhance the relevant Fenland towns and villages and help attract people to the area.</li> <li>• Inconsistency of LP16 with Policy LP15D (Employment) relating to marketing an empty property for 6 months rather than 12 months as set out, should be rectified.</li> </ul>							

- Infrastructure should be put in place for equestrians as well as pedestrians and cyclists and recognise the significant value and potential equestrian businesses can bring to the district.
- Chatteris town centre is of very poor quality and should aim to be more like Ely as a beautiful destination. More pedestrianisation with a one-way system would improve the shopping environment. All parking should use the free car parks nearby. Fens Reservoir will be a great opportunity to make Chatteris a place worth visiting if it can be made more attractive and welcoming in the town centre.

### Section 16: Culture, Leisure, Tourism and Community Facilities

#### Summary of Issues

<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>
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- No mention of the rights of way network which needs to be addressed to ensure this fits with a priority of the Fenland Leisure Strategy (2017) to 'provide an efficient, sustainable leisure centre service, focused on getting more people, more active, more often'.

### Policy 17: Culture, Leisure, Tourism and Community Facilities

#### Summary of Issues

<b>Total:</b>	<b>6</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>2</b>
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#### Natural England

- Welcome and support policy and suggest it should be framed around opportunities to link in with the culture, leisure, tourism and community enhancements that will be delivered through the Fens Reservoir. FDC is in a unique position to encourage development that will deliver complimentary benefits for people and nature within a wide zone of influence of this significant project and the ecosystem services it aims to provide.

#### Cambridgeshire County Council

- Need to acknowledge Library services can provide a wider range of joint services for the community e.g. in public health, health and well-being and the NHS, and need flexibility to rationalize and move facilities as part of new development in established communities if the development draws away natural use/footfall away from an existing site. Request additional bullet point to this effect.

#### Middle Level Commissioners

- Known for some time that Fenland is lacking in suitable open spaces such as Country Parks - particularly apparent during the COVID-19 pandemic. Fens Reservoir may help to balance the shortfall.
- Need to acknowledge most watercourses within the Fenland area are navigable.
- The valued contents of Policy DM8 – 'Riverside Settings' contained in FDC's 'Delivering and Protecting High Quality Environments in Fenland' SPD should be included in the new Local Plan.
- A water frontage / water space strategy, to identify suitable locations for moorings, marinas and other enhancements would be beneficial for the district.
- Currently a strong demand for simple, rural mooring sites where boaters can stop for a while during the day or overnight which should be included in the policy.

#### Other comments:

- Policy welcomed to support and protect the district's valued facilities.
- Marketing of empty facilities should be for a least 12 months at a realistic market price/rent for existing use and condition without development potential. Need caution as the presence of nearby similar provision may not necessarily mean the offers of both are compatible.
- Infrastructure should be put in place for equestrians and carriage drivers as well as pedestrians and cyclists and recognise the significant value that equestrian related businesses can bring to the district.

- Wenny Meadow, Chatteris should work with the landowner / developer to plan for its retention as a community open space facility to promote health and wellbeing and interaction with nature.

### Section 17: Development in the Countryside

#### Summary of Issues

<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
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- The support text includes statements about the importance of agriculture to the Fens which is supported. (Paragraph 17.17)
- Need for more supporting information about nature conservation in the countryside.

### Policy LP18: Development in the Countryside

#### Summary of Issues

<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
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- Lack of rural transport, and now more reductions proposed to the service.
- Support for policy that allows for greater flexibility for replacement dwellings.
- Active travel to improve public rights of way for all users.
- Policy LP1 and LP18 are restrictive
- Policy should be more flexible
- Not consistent with policy LP6. Policy should include provision for utility renewable projects which require open countryside locations.

### Section 18: Transport and Infrastructure

#### Summary of Issues

<b>Total:</b>	<b>21</b>	<b>Support:</b>	<b>3</b>	<b>Object:</b>	<b>10</b>	<b>Neutral:</b>	<b>8</b>
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- The focus on public transport needs to be reviewed, due to the poor road network and large distances to cover. Focus needs to be put on upgrading the road network before investing in buses.
- Concerns about lack of infrastructure to meet existing needs
- Better train service, especially increased hourly service from Manea and Whittlesey
- Support needs for Whittlesey Relief road
- Concerns as bus services within Cambridgeshire have been greatly reduced.
- Concerns about increase HGV traffic, particularly within the Market Towns.
- Walking and cycling infrastructure is limited
- Suggestion that more reference is required to Active Travel.

### Policy LP19: Strategic Infrastructure

#### Summary of Issues

<b>Total:</b>	<b>14</b>	<b>Support:</b>	<b>4</b>	<b>Object:</b>	<b>6</b>	<b>Neutral:</b>	<b>4</b>
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#### Environment Agency – Objects

- The Future Fens Flood Risk Management Baseline Report (December 2020) indicates there is some uncertainty regarding the availability of government funding for continued maintenance of the flood risk management infrastructure in the Fens over the next 100 years.
- Therefore, strongly recommend that the policy includes a requirement for any new major development in flood risk areas that benefit from flood defences to provide financial contributions to existing flood risk management infrastructure to ensure the development is sustainable and flood risk benefits are provided to existing communities.

#### National Highways (Operations East)

- Supports objective that all new development should be supported by, and have good access to, all necessary infrastructure.

#### Natural England

- Welcome proposal to update the 'Fenland Cycling, Walking and Mobility Improvement Strategy' to develop a core network of routes that can be improved in the short and medium term and built upon in the future.
- Aware that the Fenland Local Transport Plan is being developed with a focus on improving accessibility by both road and public transport. Also support policy to improve walking and cycling links and Public Rights of Way.
- Strong policies to promote sustainable travel including requirements to protect and enhance the cycle and footpath network and facilities are important as reducing people's reliance on car travel can provide significant air quality, climate change and health benefits.

#### Cambridgeshire County Council – Objects

- Concerned that future funding through S106 planning obligations is unlikely to be sufficient to fund the delivery of the additional school places necessary to meet the demands from new housing development. Fenland's approach outlined in the Local Plan Viability Assessment allows for a disproportionate amount of surplus development value to go towards affordable housing with insufficient allocated for essential infrastructure, currently £2,000 per dwelling. It is therefore necessary to strike a more equitable balance when apportioning development surplus between funding through S106 agreements and affordable housing.
- The County Council's own financial position, as with many local authorities, means that it is seeking to restrict its borrowing and fund the creation of additional school places through developer contributions or capital grant. If there is a shortfall in developer contributions the County Council may have to consider other solutions such as temporary accommodation and transporting children to alternative schools, an unpopular and costly measure in a rural district.

#### Cambridgeshire County Council (Connecting Cambridgeshire) – Objects

- The Local Plan needs a specific policy or SPD relating to Digital Infrastructure in accordance with section 10 of the NPPF: "Supporting high quality communications".
- Unless Digital Connectivity is covered in the Local Plan or an SPD it will be difficult to enforce any requirement for high quality communications in new developments for which society has become increasingly reliant on.

#### Peterborough City Council

- There are a number of transport considerations that could have implications for Peterborough and further analysis is needed to understand these potential impacts.
- The A605 is a key strategic route and increasing traffic along this route could cause issues at certain junctions. Would welcome further work on this potential issue, in particular in the Peterborough unitary area. This should include a sensitivity test with North Bank shut, as that road floods every year resulting in more traffic using the A605 and the surrounding network.
- HGVs in residential areas is also a concern. PCC would not want to see an increase in HGVs using inappropriate local roads that can negatively affect communities. Measures to prevent this issue need to be considered.
- Improving sustainable transport is key and PCC is currently developing its Local Cycling and Walking Infrastructure Plan and its rural cycle strategy. This provides excellent opportunities to work in partnership with FDC to enhance cross border connections.

#### Anglian Water

- Supports policy regarding delivery of infrastructure especially where it is needed to support growth, quality of life or economic prosperity in the district. Notably, the Strategic Pipeline Alliance to enable strategic water supply transfers between water resource zones is underway including the Grantham to Bexwell section which extends through Fenland District. In addition, the Fens Reservoir will be a nationally significant infrastructure project that will provide more resilient water

storage to meet future demands, and to protect and restore the environment.

Parson Drove Parish Council – Objects

- Inadequate policy as it does not properly address how infrastructure will be delivered in the rural areas. Currently development occurs without adequate infrastructure benefits.

Wisbech St Mary Parish Council – Objects

- The Queensbridge Homes development in the village has shown how badly developer viability claims can affect an area. Developments of a certain size must be conditioned by FDC to make provision for play, infrastructure, schools and health regardless of whether the developer makes over 10% profit. If the development is determined as unviable then it should not be given planning permission unless it can offer a fair degree of affordable housing.
- There is no mention of how infrastructure will develop along with housing growth within rural areas.
- Connectivity between rural areas and towns is a must to alleviate rural isolation.

Doddington Neighbourhood Plan Group

- For too long FDC has accepted viability arguments from developers which has led to the delivery of infrastructure (particularly affordable housing) being compromised. Often this is achieved through amending S106 Agreements after they have been agreed. Developers should be accountable and deliver the schemes that have been granted planning permission.
- Where developers make such viability arguments for allocated sites within the new Local Plan the community should be able to consider whether such proposals should not be granted planning permission as the benefits of delivering a development without affordable housing may not be acceptable (developers will be aware of viability considerations when putting land forward for allocation within the Local Plan).

Other comments

- Policy needs a mechanism for considering viability constraints. This should be line with the wording of the 2014 Fenland Local Plan Policy LP5 Part A that a recognized Viability Assessment model should be submitted in support of negotiations.
- Support policy principles.
- Given that a Viability Report supports the Local Plan Review, the policy wording should refer to the provision of infrastructure ‘where viable.’
- Infrastructure Delivery Plan (IDP) needs to be updated and consulted on as the policy states that decisions on securing conditions and obligations towards strategic infrastructure will reflect the ‘prioritisation’ categorises set out in the IDP which is now significantly out of date (2016).

**Policy LP20: Accessibility and Transport**

**Summary of Issues**

<b>Total:</b>	<b>14</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>4</b>	<b>Neutral:</b>	<b>8</b>
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Natural England

- Welcome proposal to update the ‘Fenland Cycling, Walking and Mobility Improvement Strategy’ to develop a core network of routes that can be improved in the short and medium term and built upon in the future.
- Aware that the Fenland Local Transport Plan is being developed with a focus on improving accessibility by both road and public transport. Also support policy to improve walking and cycling links and Public Rights of Way.
- Strong policies to promote sustainable travel including requirements to protect and enhance the cycle and footpath network and facilities are important as reducing people’s reliance on car travel can provide significant air quality, climate change and health benefits.



#### Sport England

- Policy must encourage designs and layouts to include pedestrian and cycle routes that are safe and connected to existing networks.

#### British Horse Society (and others) - Object

- Equestrians should be included in the policy.
- Policy must provide for multi users, it is discriminatory to do otherwise.
- Fenland is an area with very poor access routes for horses to encourage off road hacking, these should be included in all access proposals as part of access sharing with pedestrians and cyclists.

#### Peterborough City Council

- There are a number of transport considerations that could have implications for Peterborough and further analysis is needed to understand these potential impacts.
- The A605 is a key strategic route and increasing traffic along this route could cause issues at certain junctions. Would welcome further work on this potential issue, in particular in the Peterborough unitary area. This should include a sensitivity test with North Bank shut, as that road floods every year resulting in more traffic using the A605 and the surrounding network.
- HGVs in residential areas are also a concern. PCC would not want to see an increase in HGVs using inappropriate local roads that can negatively affect communities. Measures to prevent this issue need to be considered.
- Improving sustainable transport is key and PCC is currently developing its Local Cycling and Walking Infrastructure Plan and rural cycle strategy. This provides excellent opportunities to work in partnership with FDC to enhance cross border connections.

#### Benwick Parish Council

- Need to mention the terrible state of the road surfaces, which are very noticeable, can damage vehicles, and could cause accidents. 18 months ago the road from Ramsey to Benwick was improved but it is now in a very bad condition.
- Dial a ride should be publicised so people are aware of it.

#### Other comments

- Transport and Connectivity within the Fens is poor. Services do not run regularly enough or late enough. This prevents individuals from being able to access facilities to support their Health and Wellbeing.
- Road safety should include provision for powered two-wheelers. Moped, motorcycle and scooter use is a viable alternative to many over private car use with ownership and running costs.
- Bus services are being cut across Fenland, so how will you ensure patients have access to healthcare services, and that new developments are not increasing the health inequalities across Fenland that already exist?
- Bullet point A should be expanded to ensure that development layouts can accommodate public and emergency services, such as waste collection, fire and rescue and public transport vehicles.
- Despite policy wording, the proposals for March Town Centre Regeneration do not include a cycle lane in High Street / Broad Street which will inevitably result in cyclists using the pedestrian area making both unsafe. Parking restrictions will be vital in ensuring safe passage through town - there has been no parking enforcement for many years and there appears to be no funding in the near future either. Need joined up thinking.
- Need policy which provides specific safe routes for pedestrians / cyclists through and around the market towns (including March) away from vehicular traffic, with linkages to existing routes and minimising contact between the two.

### Policy LP21: Public Rights of Way

#### Summary of Issues

<b>Total:</b>	<b>9</b>	<b>Support:</b>	<b>4</b>	<b>Object:</b>	<b>5</b>	<b>Neutral:</b>	<b>0</b>
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Natural England, RSPB, Sport England – Support

- Important to have strong policies to promote sustainable travel including requirements to protect and enhance the cycle and footpath network and facilities.
- Reducing people’s reliance on car travel can provide significant air quality, climate change and health benefits.
- Access to greenspace and nature has been well documented as important in improving physical and mental health.
- The limited PROW network in Fenland should be improved, particularly adjacent to settlements.

British Horse Society (and others) – Object

- Policy must be linked to every other policy which goes before it.
- The PROW network cannot be protected ‘in principle’ – it must be protected without question.
- Fenland is an area with very poor access routes for horses to encourage off road hacking, need to include access for equestrians as part of all access proposals and sharing with pedestrians and cyclists.
- Should also protect soft surfaced rural bridleways / restricted byways / byways which are grass covered as part of Fenland’s heritage and not urbanise them through tarmac or other hard top. All cyclists can already use these routes, and many enjoy doing so. It is only narrow tyre cycles intended for tarmac use which cannot use them comfortably. All the other rightful users (walkers, dog walkers, runners, off road cyclists, horse riders, carriage drivers) are soft surface users and their rights and amenity must be protected.
- Need to provide for carriage drivers.
- Need long distance provision for equestrians.

Other comments

- Need wording to allow for PROW to be diverted to integrate within a new development, as long as it is not being removed.
- Policy offers the potential to allow continued public access to Wenny Meadow.

**Policy LP22 Parking Provision**

**Summary of Issues**

<b>Total:</b>	<b>15</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>9</b>	<b>Neutral:</b>	<b>4</b>
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Cambridgeshire County Council

- Cycle parking should be provided in Appendix 6 for all use classes of development to promote active travel and the resultant health benefits that will accrue.
- The E use class (medical etc.) may need additional larger spaces/drop-off areas for ambulance(s) or other large vehicles in addition to the car parking requirements.
- As the model of services delivered from these use class changes the parking requirements may also need to change e.g. ‘parking spaces per consulting room’ may change to ‘combined surgeries/health centres’ and ‘collocated services’ etc. As such policy wording needs to be flexible.

Parson Drove Parish Council

- Parking provision should be different for rural areas (particularly those without access to public transport). In rural areas this should be one space for each bedroom.

Doddington Parish Council

- Number of spaces provided per house is usually two. In rural areas the norm now is at least three per house. Parking on roads causes severe congestion and makes it virtually impossible for large vehicles (including ambulances and fire engines) to progress through the village.

Wisbech St Mary Parish Council

- Sayers Crescent in the village highlights the need for better parking on new developments. Seek one space per bedroom. Due to cuts in rural areas have fewer buses and people rely on cars/vans to travel to and from their places of work and education. Therefore, need spaces to park without causing issues for HGVs and FDC refuse lorries.

Other comments

- Evidence is required for parking standards.
- Policy is not sound as it is not justified or effective.
- Also unsound as it will compromise good design principles i.e. paragraphs 126 and 127 of the NPPF.
- Need a balance between parking provision and ensuring good urban design and place making principles are followed. Need to avoid car-dominated layouts.
- Support minimum standards but the number of spaces provided, and their location and access, should be informed by the site context and location.
- Standards are more than adequate for future developments, and in some locations, for example sites within or close to town centres, this number could be relaxed.
- Need a clear standard for town centre locations.
- Rationale for excluding garages from counting towards parking spaces is unclear.
- A single garage should count as a parking space if it is of a sufficient size as specified within the Local Plan.
- Would be sensible to impose a minimum size for garages to count towards parking provision rather than just excluding them entirely e.g. minimum length of 6m and minimum width of 3m for single and 5.5m for double garages for all spaces to be counted towards parking requirement so there is room to fit a vehicle within the garage and exit from it.
- Removing garage allowance will result in developments without any garages at all.
- Garages can assist with storage requirements as well as introducing important design variations to developments.
- Level of visitor parking proposed is both excessive and unjustified.
- Standards for 4-bedroom dwellings need to be reviewed. Should be reduced to 2.2 spaces per dwelling or the policy changed to allow for larger garages to count towards a parking space.
- Parking for powered two-wheelers and electrical charge points for those powered by battery needs to be specified.
- Support policy requiring infrastructure for charging electric vehicles as set out in Building Regulations Part S, rather than seeking a separate requirement which could in the future be inconsistent with the Building Regulations requirements.
- Part A should be re-worded to state:- 'residential car parking to be in accordance with the minimum standards set out at Appendix 6'.

**Section 19: Historic Environment**

**Summary of Issues**

<b>Total:</b>	<b>6</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>4</b>	<b>Neutral:</b>	<b>1</b>
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Historic England welcomes the emerging local plan. However, they have identified the following issues:

- Site Assessment and the need for Heritage Impact Assessments
- Policy Wording for sites
- Design Policy
- Renewable Energy

Policy should make reference to other non-designated assets such as the local list.

**Policy LP23: Historic Environment**

**Summary of Issues**

<b>Total:</b>	<b>10</b>	<b>Support:</b>	<b>5</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>2</b>
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- The policy must refer to non-designated assets.
- There is a need for an updated Building of Local Importance list.
- Suggestion to include sections on Listed Buildings, Registered Parks and Gardens and scheduled monuments as well as Non-designated heritage assets.
- Recommendation to make the Heritage at Risk sentence a bullet point.
- Fenland’s historic environment is intrinsic to the district’s character and sense of place. Our towns and villages all have their own identities which defines them, and this is strongly defined by the built environment. We must protect our heritage.
- Objection as in some consultees view the policy does not identify the level required to be able to demonstrate compliance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

## Section 20 Natural Environment

### Summary of Issues

<b>Total:</b>	<b>12</b>	<b>Support:</b>	<b>4</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>5</b>
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#### Historic England

- Welcome paragraphs and policy relating to Carbon, but they should also reference Archaeology.

#### Cambridgeshire County Council

- Agree the extensive waterways and ditch network are key wildlife corridors within the Fenland landscape. Should recognise that drainage ditches are a local biodiversity action plan habitat, with many watercourses supporting notable and aquatic plant and invertebrate species and assemblages. Therefore, important that adequate survey work is carried out to determine impact on these valuable habitats / species. Seek changes and clarification relating to the policy content, layout and terminology.

#### Wildlife Trust

- Support need for applicants to complete biodiversity checklist and an accompanying ecology report if required.

#### Woodland Trust

- Highlights shortcomings of current policy and sets out ways in which this should be improved. Want to work with FDC to enable it to better protect woodland, particularly irreplaceable habitats such as ancient woodland and ancient and veteran trees, and to plant trees as part of a well-planned network of green infrastructure. Due to current paucity, woodland creation is key as well as the right tree in the right place.

#### RSPB

- Supports FDC’s objectives to contribute towards the Doubling Nature target, but disappointed there are no measurable targets such as a percentage/area of land area under management for nature or managed in a way that benefits nature. The aspiration should be followed through with measurable outputs and outcomes.

#### Middle Level Commissioners

- Welcome references to the success of the Biodiversity Action Plans (BAPS) undertaken by the MLC and the other IDB Boards. Recognise benefits of any tree planting in the higher extents of a catchment to reduce and slow flows entering the lower “fen” system but suggests this may be difficult to achieve in Fenland as is likely to conflict with current and/or future allocations where development would take place.

Other comments:

- Support the designation of 'Wenny Meadow' as a Local Green Space.
- Agree that all new developments should have no net loss in biodiversity.

## Policy LP24: Natural Environment

### Summary of Issues

<b>Total:</b>	<b>19</b>	<b>Support:</b>	<b>11</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>5</b>
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#### Natural England

Plan needs to set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity through all relevant development including housing, transport and community infrastructure.

- 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 to be used to develop the strategy. These should be identified on an ecological opportunities map and detailed in a GI Strategy, or ideally a Biodiversity SPD.
- Local Nature Recovery Strategies offer an opportunity to identify and prioritise these opportunities for habitat recovery in order to strategically deliver mandatory BNG in keeping with the spirit of the Environment Act.

#### Environment Agency

- Support policy but need to reword and strengthen Part A: Designated Sites (SSSIs and Local Sites), Part B: Biodiversity and Geodiversity in Development with reference to the Water Framework Directive (WFD) and the Cambridgeshire Flood and Water SPD. Should also make reference to the many wildlife and other benefits of Suds and reference The Fens for the Future Strategy for the design of Biodiversity Net Gain opportunities linking to wider schemes.

#### Cambridgeshire County Council

- Needs to identify key wildlife corridors and stepping-stones for connectivity of the designated sites and other notable habitats. Need a strategic nature network for Fenland showing these features in line with NPPF paragraph 179. Evidence such as J. Rouquette's initial Habitat Opportunity Maps (2019) and the work for East Cambridgeshire DC should be referenced to assist in its production.
- Needs to include local Biodiversity Action Plan habitats / species (e.g., drainage ditches) and 'irreplaceable habitats and priority species / habitats'.

#### RSPB and others

- Seek clarification and revisions to terminology.

#### Other comments provide a mix of responses:

- Object to splitting in half of Wenny Meadow site and only having part of it as Local Green Space.
- Object to the inclusion of Part D "Goose and Swan Functional Land Impact Risk Zone" as a designated area as not justified or necessary. Policy wording is inaccurate. IRZ notation should be removed from the Policies Map.
- Support inclusion of Part D "Goose and Swan Functional Land Impact Risk Zone"
- Support the requirement for a net gain in biodiversity but without including the size of gain required in the policy wording, so that the requirement can reflect national requirements at the time.
- Support, with suggestions for improvement.
- Need to better define Part C: Mitigation of Potential Impacts of Development.
- Should identify, designate, and protect more Local Wildlife Sites and County Wildlife Sites in Fenland.

<b>Policy LP25: Biodiversity Net Gain</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>24</b>	<b>Support:</b>	<b>7</b>	<b>Object:</b>	<b>12</b>	<b>Neutral:</b>	<b>5</b>
<p>There was a mixed response to this policy with comments summarised below:</p> <ul style="list-style-type: none"> <li>FDC’s assertion that there will be few instances where developers will be able to invest in the Government’s biodiversity credit scheme is not warranted.</li> <li>Policy is unsound as it is not consistent with national policy or effective and should be amended.</li> <li>Achieving biodiversity net gain on-site can be complex and difficult to achieve.</li> <li>General support, but first paragraph needs to be amended to say that 10% Net gain must be provided, not should.</li> <li>Concerned that policy only seeks to deliver the mandatory 10% BNG minimum not 20% as set out in the Doubling Nature Vision as Cambridgeshire is one of the most nature depleted counties in the country with only 13% of land supporting semi-natural grassland, woodland, and water habitats.</li> <li>Local Nature Recovery Strategies will be an incentive for BNG offsite compensation sites and the evidence gathered to produce the LNRS – national and local habitat maps, opportunity areas etc, will be an important evidence source for local plan preparation.</li> <li>Should reflect national requirements at the time which may be more or less than the stated 10%.</li> <li>Should always be a minimum level of 10% Biodiversity Net Gain in the new local plan and therefore BNG should be set at “10%, or a level required by The Environment Act 2021, whichever is greater.”</li> <li>Policy needs to be amended to be more flexible and enable other mechanisms for creating biodiversity gain to be incorporated. LNRS may provide one way of achieving net gain but there are other opportunities, for example, using land already owned, purchasing neighbouring land or buying credits from a Biodiversity Net Gain provider.</li> </ul> <p>Other comments</p> <ul style="list-style-type: none"> <li>Splitting in half of Wenny Road site will fragment the interwoven ecology further isolating rare and endangered insect populations and resulting in these species becoming “more prone to local extinction”.</li> <li>Impossible to achieve the 10% net gain on Wenny Meadow.</li> <li>Protection of the natural environment requires action that will actually protect.</li> </ul>							
<b>Policy LP26: Carbon Sinks and carbon Sequestration</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	<b>11</b>	<b>Support:</b>	<b>5</b>	<b>Object:</b>	<b>5</b>	<b>Neutral:</b>	<b>1</b>
<p>Natural England</p> <ul style="list-style-type: none"> <li>Supports policy as it recognises importance of Fenland’s peat soils as a significant carbon store, in helping to improve air quality and mitigate against climate change but the Plan needs to be underpinned by ecological mapping of the opportunities for this to be delivered.</li> <li>This issue has not been properly addressed through the Sites Evidence Report and SA.</li> <li>Ecological mapping will help protect sensitive areas, prioritising the peat soils for GI and nature recovery opportunities, and targeting allocations in more sustainable locations.</li> <li>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 for delivery of strategic / landscape-scale enhancements, in accordance with NPPF paragraph 179.</li> </ul> <p>Anglian Water</p> <ul style="list-style-type: none"> <li>Supportive of nature-based carbon sequestration schemes and own Net Zero Strategy to 2030 plans to remove or offset residual emissions by planting 50 hectares of woodland on Anglian Water sites, explore nature-based opportunities using wetlands, marshes and grasslands and work with</li> </ul>							

landowners to develop land management schemes that avoid and remove emissions.

Other comments

- Welcome text and policy relating to carbon.
- Policy should also reference archaeology.
- Seek clarification and amendments to policy wording.
- Promises on Saxon pit Whittlesey have not been carried out.
- Policy does not go far enough in dissuading development of peatland sites.
- Policy needs to be clear which areas within the district will be affected by carbon sinks and carbon sequestration and be consulted on as part of the local plan review. Policy should not be applied to allocated sites in the Local Plan.

**Policy LP27: Trees and Planting**

**Summary of Issues**

<b>Total:</b>	<b>7</b>	<b>Support:</b>	<b>3</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>2</b>
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Natural England

- Generally support, but tree planting needs to be targeted in appropriate locations and considered in the context of wider plans for nature recovery. E.g. ecological impacts and the opportunities to create alternative habitats that could deliver better enhancements for people and wildlife, and store carbon effectively.
- Where woodland habitat creation is appropriate, should consider natural regeneration, and ‘rewilding’ for the economic and ecological benefits this can achieve.
- Any tree planting should use native and local provenance tree species suitable for the location.
- Should include requirements to protect and enhance native species hedgerows and the planting of new species-rich hedgerows to enhance habitat connectivity.

RSPB

- ‘Mitigating for Loss of Trees and Woodland’ - Although a larger number of new trees may mitigate the carbon storage and sequestering potential of a single large tree, their biodiversity and landscape value will not replace that of a mature or veteran individual.
- Policy needs to be better integrated into those for Biodiversity Net Gain and Natural Environment policies, so that the mitigation hierarchy is followed, and in terms of enhancement through BNG, the most appropriate habitats are provided on site which may or may not include trees.

Other comments

- Should encourage more mature trees to be planted when providing replacements.
- Should encourage the retention of decaying trees (and groups) where these are not dangerous.
- Policy should also be explicit that planning conditions should seek the retention of any replacement trees, and to add Tree Protection Orders to any trees that are retained during a development to avoid them being removed at a later stage.
- All “major developments” to have a minimum number of new trees.
- Promises on Saxon pit Whittlesey have not been carried out.
- More flexibility is required in the wording i.e. to allow for accesses and not to be too prescriptive about the use of native species.

**Policy LP28 Landscape**

**Summary of Issues**

<b>Total:</b>	<b>5</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>2</b>
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Natural England

- Supports policy and would strongly encourage recognition of the application for a UNESCO Fens Biosphere designation as a key opportunity to achieve the policy objectives.

Historic England

- Welcome supporting paragraphs and policy in relation to landscape and landscape character.

Anglian Water

- Seek clarification regarding the policy approach and opportunities for renewable energy projects that are conferred by Policy LP6 (Renewable Energy etc). Need to understand how renewable energy projects will be assessed in landscape terms and the assessment framework used to determine the site allocations for large scale onshore wind.
- There is no Landscape Character Assessment to inform future development in the district, including landscape capacity for renewable energy.

Other comments

- Due to their size and scale, commercial solar parks can have an impact on the landscape. FDC should consider the mitigation of landscape impacts, acknowledging that these can take time to establish. Development should not be judged on its visual impact solely on its first year of development, but rather after a significant amount of time that has allowed for the full germination of planting and landscape management regimes.

**Policy LP29: Green Infrastructure**

**Summary of Issues**

<b>Total:</b>	<b>15</b>	<b>Support:</b>	<b>11</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>2</b>
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There was overwhelming support for this policy in principle but with some significant amendments sought.

Natural England

- Supports recognition of green infrastructure as ‘natural capital’ that can deliver a wide range of ecosystem services including health and recreational benefits, allowing people to enjoy the countryside, drainage and flood risk management, urban cooling to support climate change mitigation, food production, wildlife habitats.
- But needs urgent preparation of a Green Infrastructure Strategy, informed through ecological opportunity mapping, as a framework for the Local Plan as per paragraph 175 of the NPPF.
- And needs to make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 92 of the NPPF.

Environment Agency

- Requirement for green infrastructure within major development proposals should be strengthened to ensure it is always provided.
- This is a key opportunity to provide climate change adaptation and mitigation that must be seized, as appropriate green infrastructure as a nature-based solution can reduce the long-term implications of a development on flood risk, coastal change, water supply, biodiversity and landscapes.
- In addition to LP29, green infrastructure should also be referenced within LP5: Health and Wellbeing, LP7: Design, and LP32: Flood and Water Management, and within the ‘Land Use and Wildlife’ Sustainability Objective.

Sport England

- Supports policy that maintains and improves existing green infrastructure and encourages healthy and active lifestyles.

Cambridgeshire County Council

- Needs to demonstrate how Part D: Designated Nature Sites – Mitigation of Recreational Impacts of Development will be adequate to address adverse impacts.



- Needs to address existing pressure on wildlife sites.
- Development of land containing peat soils should not be permitted.
- New forests should be planned for as a means of additional carbon sequestration.

**Wildlife Trust**

- Enhanced Green Infrastructure including accessible natural greenspaces is desperately needed in each of the 4 market towns to increase their attractiveness as places to invest in, and to live and work.
- Disappointing that the detailed site allocation policies do not follow through on this GI policy, by identifying locations for the provision of the strategic and local green infrastructure desperately needed to improve the attractiveness of the towns, and to help address the associated health challenges.
- Without specific identification of the scale and type of Green Infrastructure required, the Local Plan will fail to address the needs of the local population or achieve its stated objectives, including the attraction of future inward investment.
- A specific and detailed GI plan of action is required for the district.

**Other comments**

- Need to use the term ‘Active Travel’ to ensure consistency by planners and applicants and to meet the requirements of the Cambs ROWIP and the Cambridgeshire and Peterborough Local Transport Plan.
- Need explicit reference to the protection of Natural Green Space.

**Policy LP30: Local Green Spaces and Other Existing Open Spaces**

**Summary of Issues**

<b>Total:</b>	<b>177</b>	<b>Support:</b>	<b>8</b>	<b>Object:</b>	<b>162</b>	<b>Neutral:</b>	<b>7</b>
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**Natural England**

- Supports, but in the absence of a Green Infrastructure Strategy to illustrate these existing areas, and opportunities for delivering new and enhanced green infrastructure through Plan development, the policies are rather weak and meaningless. Welcome protection and enhancement of Public Rights of Way through Policy LP21: Public Rights of Way and site allocation policies.

**Public Health (Cambs CC)**

- Policies LP30 and LP31 would benefit from a supportive policy to encourage the provision of green space near older people’s housing. Walkable green spaces near the residences of older people aged 75+ significantly and positively influences five-year survival.
- Appendix 5 – Open Space Standards would benefit from including other design features as part of the standard required such as provision of paths, drinking fountains, street furniture etc. within open/green spaces possibly in a design SPD.
- Both “blue” and green space are important environmental determinants of health but consider the need for blue space would be better served by a separate policy or within an open space SPD.

**Other Matters**

- Tydd St Giles - Several nominations for LGS designation for a site in known as The Wild Flower Meadow.
- Chatteris Town Council - has nominated a large number of sites within the town for LGS designation.
- Wisbech St Mary - Support for LGS submission 60012 (excluded from Draft LP).
- Doddington PC – Support Part C indoor sports.

**Objections**

Wenny Meadow, Chatteris - 162 objections have been received about this policy.

- In short there is support for the designation of part of Wenny Meadow as a Local Green Space (LGS) but objections to the fact that the whole of the meadow is not included as a LGS. Consider that the area allocated as LGS is not sufficient as Chatteris is deficient in all standards of Accessible Natural Green Space and the site is extremely important to local people.
- The site assessment evidence specifies that Wenny Meadow meets the criteria for designation (in NPPF paragraph 102) due to its beauty, historic and recreational value, tranquillity, and the amount and biodiversity of wildlife. 92% of voters in the Parish Poll on 7th June 2022 supported the designation of the site as a LGS - the most nominations for LGS designation out of all sites in Fenland during the initial consultation.

Other issues relating to Wenny Meadow:

- LGS designation should be widened to include all of the meadow and adjacent fields.
- Whole site has been used for public recreation for more than 100 years as evidenced by written records.
- Chatteris has large tracks of open land on all sides but only has one green lung within the town, and which is close to the town centre. Whilst there are other formal FDC owned parks, there is no other informal space, away from children’s playgrounds that allow this type of use, such as the meadow.
- A natural haven for wildlife. As the town expands, allocation of virgin land elsewhere will take many decades to establish itself anywhere near the quality of the meadow today.
- Other more suitable spaces are available in Chatteris to meet the demands of national house-building needs.
- Planning application on remainder of meadow has prevented the designation of all of the site as an LGS – but this would be contrary to NPPF para 101. Application should have no bearing on the local plan allocation and, whilst undetermined, carries no planning weight whatsoever.
- Plan acknowledges that this site faces significant barriers to delivery and is therefore unsuitable for inclusion in the area designated for housing. There has been no activity from the applicant on this application for many months, with many outstanding issues left unresolved.
- Developer needs to meet the 10% BNG test.
- To not allocate the whole site as LGS is perverse and FDC has acted inappropriately.
- Democratic poll has been ignored.

**Policy LP31: Open Space and Recreational facilities**

**Summary of Issues**

<b>Total:</b>	<b>30</b>	<b>Support:</b>	<b>21</b>	<b>Object:</b>	<b>7</b>	<b>Neutral:</b>	<b>2</b>
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Natural England

- Supports policies but the lack of a Green Infrastructure Strategy to illustrate existing areas, and opportunities for delivering new and enhanced green infrastructure through Plan development, makes the policies weak and meaningless.
- Welcome that protection and enhancement of Public Rights of Way is addressed through Policy LP21: Public Rights of Way and site allocation policies.
- For mitigating recreational pressures on sensitive designated nature sites this should be addressed strategically through the Sustainability Appraisal (SA) which needs to identify prescriptive measures to be delivered through robust Plan policies.

Sport England

- Policy should protect both existing indoor and outdoor sports facilities and seek new ones in locations where they are needed.
- The Fenland Local Football Facilities Plan (2019) gives guidance on where investment in existing and

proposed football facilities is needed, including improvements to existing sites.

**Wildlife Trust and RSPB**

- Supports Part D Designated Nature Sites – to ensure recreational pressure is mitigated when this might adversely affect designated nature conservation sites.

A number of responses were received to explain that March Bears Rugby Club is thriving and with support can grow further. It should be supported by the Local Plan and FDC in its quest to find a new home / better facilities as the current facilities are inadequate for the current strong interest in club rugby in March for all ages and sexes.

**Other comments**

- Not clear how the proposed open space requirements in Appendix 5 have been arrived at.
- No calculation provided for children per household. Not clear how playground need should be calculated which should use same formula as other open spaces.
- Quantum of open space sought is too great considering the viability context of Fenland.
- 1.8ha natural green space in addition to 0.34ha informal green space is excessive.
- Threshold for on-site provision of public open space should be 50 units and appropriate financial contributions towards a scheme within close proximity should be considered. Insufficient evidence to show that a 20-unit scheme would create a need for on-site public open space provision as it will not generate a critical mass of population to warrant on-site provision unless within a smaller order settlement. In Market Towns a 20-dwelling scheme should make, subject to viability, an appropriate financial contribution towards a larger strategic scheme.

**Section 21: Flood and Water Management**

**Summary of Issues**

<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
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Environment Agency – Extensive comments provided.

**Part A: Flood Risk**

- Strongly recommend waiting until the Level 2 SFRA has been completed so that its findings can fully inform the Emerging Local Plan, as it would be unsound not to do so.
- No evidence has been provided in the Level 1 SFRA to demonstrate that a more detailed assessment of flood risk (as stated in the plan) has been undertaken for those site allocations located partly in Flood Zones 2 and 3.
- Need to include breach hazard mapping for the Ouse Washes from EA’s Fenland Model.
- Some text needs to be stronger and recognise the challenge that arises from the reliance on flood defence infrastructure, with reference made to the Future Fens Flood Risk Management Baseline Report and Future Fens Integrated Adaptation Programme.

**Part B: Water Quality and Efficiency**

- Should utilise Fenland Water Cycle Study recommendations in the Local Plan document.
- Advice provided where there are concerns about water quality from development with a proportional approach to additional information.
- If there is insufficient capacity a detailed site wide Foul Water Drainage Strategy will be needed.

**Water Resources**

- Need to reference Anglian Water’s updated WRMP (due 2022)
- Recommend any proposed development considers water resources as a key issue and FDC recognises the damage of long term increases in abstraction due to growth.
- Support adoption of optional standard of 110 litres per person per day.

#### Anglian Water

- Support reference to the incorporation of sustainable drainage systems (SuDS) and encourage nature-based solutions when designing these that will also assist with enhancing biodiversity and delivering biodiversity net gain.
- Should reference the Future Fens: Integrated Approach project, as the strategic outcomes are aligned with an integrated water management solution.
- The Outline Water Cycle Study should be updated to take account of the draft WRMP24.

### Policy LP32: Flood and Water Management

#### Summary of Issues

<b>Total:</b>	<b>18</b>	<b>Support:</b>	<b>6</b>	<b>Object:</b>	<b>6</b>	<b>Neutral:</b>	<b>6</b>
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#### Environment Agency

- Policy LP32 contains multiple crucial environmental planning considerations within one policy. Can see the benefits of a holistic approach to flood and water management but would be better to separate Part A: Flood Risk, and Part B: Water Quality and Efficiency into two policies to ensure that each matter is given sufficient weight in planning application decision making.
- Cambridgeshire Flood and Water SPD should be reviewed and updated to take into account the revised PPG on flood risk and coastal change.
- Need clear guidance for any windfall developments in residual risk areas.
- Safe access and egress to a locally identified refuge area and flood warning and evacuation plans need including.
- Need to clarify there must be no increase in surface water run-off as a result of new development to ensure there will be no increase in flood risk elsewhere.
- Part B needs to be strengthened and re-written to be more prescriptive and clearer.
- Needs to consider cumulative assessment on water supply, to be undertaken at the company /regional scale.
- Growth in the Fenland area needs to be considered as a whole and in combination with other growth pressures placed on Anglian Water.
- Any new development must aim for the highest levels of water efficiency.

#### Cambridgeshire Lead Local Flood Authority (LLFA)

- For a site-specific flood risk assessment, wording needs strengthening to match the wording of the national PPG.
- Policy should go further by requiring SuDS for all developments where feasible.
- Need specific policy or sub-section of policy around surface water management on new developments.
- Need wording around limiting surface water discharge rates and volumes to pre-development rates, and for surface water attenuation.
- Drainage hierarchy needs updating.
- Surface water must be treated and cleansed in line with national standards before being discharged from the site.
- Riparian ownership and existing drainage infrastructure needs to be included.

#### Norfolk Lead Local Flood Authority (LLFA)

- Provides advice and comments including for different phases of a development how Suds relate to the surface water drainage strategy for the whole site, and to add in allowance for future urbanisation - 'Urban Creep'.

#### Parson Drove Parish Council

- SuDS maintenance should be by a public body. Also development is restricted by EA's Flood Zones which do not reflect flooding experienced in local areas.

Wisbech St Mary Parish Council

- EA Flood Zone Maps are out of date and don't factor in the drainage boards' alleviation measures and the local knowledge of the Parish Council.

Other comments

- Anglian Water's Fens Reservoir should be shown.
- Support adoption of optional standard of 110 litres per person per day.
- Policy requires less from developments than previous policies contained within Fenland's local plans which is disappointing.
- Reference required to the many RMAs and other stakeholders involved in this sector.
- Refer to the requirement to consider surface water flooding as part of the sequential test. Without this, policy is not sound as it does not reflect national policy (NPPF paragraph 161).
- Suds are not always suitable. Consideration needs to be given to the facility to be used, what is trying to be achieved and the nature of the water level management system in the area.
- More detailed Water Cycle Study should be prepared.
- Some locations in Fenland are served by a 'vacuum sewerage' system with implications for developments in several settlements - needs assessment in the Outline WCS.
- Evidence base needs to demonstrate availability of a sustainable water supply and foul water treatment to meet the cumulative requirements of all Plan development, in combination with pressure on water resources from adjoining districts / regionally in accordance with paragraph 174 of the NPPF.

**Section 22: Environmental Pollution**

**Summary of Issues**

<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>
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Environment Agency

- Support but provides extensive advice about the need to include reference to Groundwater protection, to consider the risks from historic older gassing landfills without a current Environment Agency permit, risks from Brownfield sites, and the potential impact on Suds systems.
- Recommend an additional policy in relation to both the former Saxon Pit, Whittlesey brickworks site and the associated permit to Johnsons Aggregates & Recycling Ltd at Saxon Pit in January 2022.

Other comments

- Policy is very light and does not appear to address this key issue in a thorough way. Would be better linked to the health and well-being policy (LP5).
- Changes to legislation and enhanced targets and responsibilities should be reflected in the plan.
- Whittlesey has a number of polluting industries which have been allowed to be set up close to the town centre and schools. Traffic on A605 is also a polluter in the town.
- Policy does not represent the situation in Whittlesey. Residents feel badly let down. Plan does focus enough on the potential impact of noise and pollution on health and well-being.
- Lacks ambition in terms of what is needed to monitor and manage air pollution. Has been too much reliance on modelling and third-party equipment – not real-world independent testing for the core pollutants.

**Policy LP33: Development on land Affected by Contamination**

**Summary of Issues**

<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>0</b>
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Natural England

- Support requirements for development to protect air and water through the development of land potentially affected by contamination. The policy should require relevant development to be accompanied by a detailed hydrogeological assessment.

Environment Agency

- Support but provides extensive advice about the need to include reference to Groundwater protection, to consider the risks from historic older gassing landfills without a current Environment Agency permit, risks from Brownfield sites, and the potential impact on Suds systems.

**Policy LP34: Air Quality**

**Summary of Issues**

<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>
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Natural England

- Key issue is those proposals likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.
- Consider that the designated nature sites at risk are those within 200m of a road with increased traffic, which have habitats vulnerable to nitrogen and acid.
- Although the HRA concludes there will be no adverse effect on the integrity of the Nene and Ouse Washes internationally designated nature sites through air quality, the assessment has not been evidenced through traffic modelling or predicted exceedance of the sites’ critical loads and levels for Nox, NH3 and N and acid deposition.
- As a minimum this assessment should consider the sensitivity of the sites’ potentially affected habitats to increases in these emissions and depositions.

Other comments

- Policy is very light and does not appear to address this key issue in a thorough way. Would be better linked to the health and well-being policy (LP5).
- Changes to legislation and enhanced targets and responsibilities should be reflected in the plan.
- Whittlesey has a number of polluting industries which have been allowed to be set up close to the town centre and schools. Traffic on A605 is also a polluter in the town.
- Policy does not represent the situation in Whittlesey. Residents feel badly let down. Plan does focus enough on the potential impact of noise and pollution on health and well-being.
- Lacks ambition in terms of what is needed to monitor and manage air pollution. Has been too much reliance on modelling and third-party equipment – not real-world independent testing for the core pollutants.

**Part D – Policies for Sites**

**Part D – Policies for Sites and Settlements**

**Summary of Issues**

<b>Total:</b>	<b>16</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>9</b>	<b>Neutral:</b>	<b>6</b>
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General comments about sites received covering the following issues:

- Concerns raised that some settlements without site allocations are missing from the Plan. These villages still warrant text describing the village and the reasoning why no allocation is intended and what scope there is for windfall within the adopted boundary
- Concerns raised that some sites allocated in areas not suitable due to lack of facilities.
- Concerns about loss of peat soils for new development.
- The assessment for all sites needs to be assessed to ensure active travel.

**Evidence Base:**

- Need for level 2 Strategic Flood Risk Assessment (SFRA)

- Need to take into account surface water flooding and not just flood risk
- Site information is based on 2021 housing monitoring figures and must be updated

Several comments submitted relate to rejected sites, these comments and Key Issues are covered by the relevant settlement policies below.

### Section 23: Introduction

#### Summary of Issues

<b>Total:</b>	<b>5</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>4</b>	<b>Neutral:</b>	<b>1</b>
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- Several concerns raised that the plan is based on out-of-date housing numbers and applications. Includes allocations almost built, but not recent permissions.
- It is noted that Small Villages B of Ponders Bridge, Turves and Tydd Gote have no entry in the policy section. If the view is that no specific allocations are intended in these settlements, then it is suggested that these villages still warrant text describing the village and the reasoning why no allocations are intended and what scope there is for windfall within the adopted boundary.
- Concerns that some medium villages accommodate a disproportionate amount of development such as Coates, See Table 9.
- Concerns about the realistic delivery of the Housing Trajectory. It predicts 1,000 dwellings per year when in recent years not even met 500 dwellings.
- Objection to no buffer and limited flexibility.
- It is suggested that more assessment is required to take account of historic environment.

Some comments related to the overall growth strategy and distribution; these key issues are set out in Part B Spatial Strategy.

### Section 24: Market Towns

#### Summary of Issues

<b>Total:</b>	<b>16</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>8</b>	<b>Neutral:</b>	<b>7</b>
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Some comments received related to individual sites, the key issues are set out in the relevant site summary.

#### Wisbech

- Support for the master plan and regeneration of Wisbech Town Centre
- Note the CPCA Local Transport and Connectivity Plan refers to Wisbech Rail
- The Local Plan does not refer to the potential for a Garden Town which forms part of the Wisbech regeneration project.
- Objections to only 12% of growth towards Wisbech compared to 31% in the adopted Local Plan

#### Whittlesey

- Paragraph 24.30 refers to Hanson Brick, this should be Forterra

#### Chatteris

- Several comments relating to protecting Wenny Meadows

#### General comments

- Lack of public rights of way
- Need for infrastructure to support the planned growth

<b>Policy LP35: Regeneration of Wisbech</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	3	<b>Support:</b>	0	<b>Object:</b>	2	<b>Neutral:</b>	1	
<ul style="list-style-type: none"> <li>Why does the plan not refer the Wisbech Garden town as part of the regeneration project?</li> </ul>								
<b>LP35.01</b>	<b>Total:</b>	2	<b>Support:</b>	0	<b>Object:</b>	2	<b>Neutral:</b>	0
<ul style="list-style-type: none"> <li>Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording.</li> </ul>								
<b>Policy LP36: Residential sites allocations for Wisbech</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	13	<b>Support:</b>	0	<b>Object:</b>	9	<b>Neutral:</b>	4	
<b>Rejected sites:</b>								
Objections received to the omission of the following sites from the Draft Local Plan:								
<b>East Wisbech (40001)</b>								
<ul style="list-style-type: none"> <li>The draft Plan does not allocate land to the east of Wisbech, planning applications have been submitted, and consent is currently being sought by several planning applications. Now clear evidence that this site is deliverable, and that individual sites can come forward.</li> <li>Part of this site falls within Kings Lynn and West Norfolk, the Council have not met requirements the of Duty to Co-operate</li> <li>Objections received because the site is currently allocated in the adopted Local Plan (2014) policy LP8. Therefore, already considered a suitable site. This raises deliverability concerns for the 550 dwellings in the neighbouring authority.</li> <li>Objections as site is in Flood Zone 1 when other sites are allocated in Flood Zones 2 and 3. The draft Plan fails the sequential test.</li> <li>Concerns that a lower level of growth will impact on the delivery and long term viability of the new secondary school for Wisbech.</li> <li>SHELAA site 40213 – should have been allocated on its own. Planning applications F/Y18/0159/O for 28 dwellings</li> </ul>								
<b>Land to the rear of Glendon Gardens (40256)</b>								
<ul style="list-style-type: none"> <li>Object to the omission of this site</li> </ul>								
<b>LP36.01</b>	<b>Total:</b>	3	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	2
<ul style="list-style-type: none"> <li>Policy should include sustainable drainage and water management</li> <li>Concerns about access to the site and impact on flooding</li> </ul>								
<b>LP36.02</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
<ul style="list-style-type: none"> <li>Watercourses that may be affected: Southern boundary adjacent to a Board Maintained watercourse DRN145P1101 – College Drain.</li> </ul>								
<b>LP36.03</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
<ul style="list-style-type: none"> <li>No comments received</li> </ul>								
<b>LP36.04</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
<ul style="list-style-type: none"> <li>Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording.</li> </ul>								
<b>LP36.05</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0



	<ul style="list-style-type: none"> <li>No comments received</li> </ul>							
LP36.06	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	<ul style="list-style-type: none"> <li>Watercourses that may be affected: Eastern boundary adjacent to a Board Maintained watercourse DRN145P1009 – Goodales Dyke. Northern boundary adjacent to a riparian watercourse.</li> </ul>							
LP36.07	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	<ul style="list-style-type: none"> <li>Watercourses that may be affected: Western boundary adjacent to a Board Maintained watercourse DRN145P1101 – College Drain.</li> </ul>							
LP36.08	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	<ul style="list-style-type: none"> <li>Located within Wisbech Port Development will need to ensure that it does not prejudice the use of the port as per Policy 16 of the Minerals and Waste Local Plan (MWLP).</li> </ul>							
LP36.09	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	<ul style="list-style-type: none"> <li>No comments received.</li> </ul>							
LP36.10	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	<ul style="list-style-type: none"> <li>No comments received.</li> </ul>							
LP36.11	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	<ul style="list-style-type: none"> <li>Located with Wisbech Port Development will need to ensure that it does not prejudice the use of the port as per Policy 16 of the MWLP.</li> </ul>							
LP36.12	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	<ul style="list-style-type: none"> <li>No comments received.</li> </ul>							
LP36.13	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	<ul style="list-style-type: none"> <li>Watercourses that may be affected: Riparian watercourse adjacent to northern corner of allocation site.</li> </ul>							
LP36.14	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	<ul style="list-style-type: none"> <li>No comments received.</li> </ul>							
LP36.15	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	<ul style="list-style-type: none"> <li>No comments received.</li> </ul>							
<b>Policy LP37: Site Allocations for Non-residential development in Wisbech</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	4	<b>Support:</b>	1	<b>Object:</b>	1	<b>Neutral:</b>	2	
<ul style="list-style-type: none"> <li>The Policy should include protection of sports facilities</li> <li>Need for suitable access and footways and cycle connectivity.</li> <li>Part of site LP37.01 (SHELAA Ref 40345) is suitable for and should be reconsidered for housing development</li> </ul>								
LP37.01	<b>Total:</b>	5	<b>Support:</b>	2	<b>Object:</b>	0	<b>Neutral:</b>	3
	<ul style="list-style-type: none"> <li>This site is located within the Consultation Area for the Algores Way Waste Management Facility and Wisbech HWRC. Development will need to ensure that it does not prejudice the use of the ongoing use of the safeguarded sites as per Policy</li> </ul>							

	<p>16 of the MWLP.</p> <ul style="list-style-type: none"> <li>Support for site from landowner, as it is a deliverable site, but site should be extended.</li> </ul>							
LP37.02	<b>Total:</b>	2	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	1
	<ul style="list-style-type: none"> <li>Watercourses that may be affected: No watercourses adjacent however this should be confirmed by the developer.</li> <li>Must comply with Policy 16 of MWLP.</li> <li>Support for policy requirement for flood risk</li> <li>Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording.</li> </ul>							
LP37.03	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	<ul style="list-style-type: none"> <li>No comments received.</li> </ul>							
LP37.04	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	<p>This site is located within the Consultation Area for the Algores Way Waste Management Facility and Wisbech HWRC. Development will need to ensure that it does not prejudice the use of the ongoing use of the safeguarded sites as per Policy 16 of the MWLP.</p>							
LP37.05	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
LP37.06	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	<p>This site is located within the Consultation Area for the Algores Way Waste Management Facility and Wisbech HWRC. Development will need to ensure that it does not prejudice the use of the ongoing use of the safeguarded sites as per Policy 16 of the MWLP.</p>							
LP37.07	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	<p>No comments received</p>							
LP37.08	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	<p>Must comply with Policy 16 of M&amp;W Local Plan.</p>							
LP37.09	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	<p>This site is located within the Consultation Area for the Algores Way Waste Management Facility and Wisbech HWRC. Development will need to ensure that it does not prejudice the use of the ongoing use of the safeguarded sites as per Policy 16 of the MWLP.</p>							
<b>Policy LP38: March Community Regeneration</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	3	<b>Support:</b>	1	<b>Object:</b>	0	<b>Neutral:</b>	1	
<ul style="list-style-type: none"> <li>Policy should include protection for existing sports facilities</li> <li>Support for policy and broad location for sports and leisure provision</li> <li>Wider area should be included</li> <li>Suitable for employment and commercial use (LP40.03)</li> </ul>								
LP38.01	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	0

	Part of the site falls within the March Conservation Area Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording							
<b>Policy LP39 Site Allocations for March</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	3	<b>Support:</b>	1	<b>Object:</b>	0	<b>Neutral:</b>	2	
<p><b>New proposed site</b> The land offers a natural link between parcels reference LP39.03, LP39.04 and LP40.02 and so we would ask you to consider it to be included in the local Plan going forward.</p> <p><b>Rejected sites</b> The plan does not include all land to the West of March as identified as a strategic Allocation in the adopted Local Plan (SHELAA Ref 40007)</p>								
<b>LP39.01</b>	<b>Total:</b>	3	<b>Support:</b>	1	<b>Object:</b>	0	<b>Neutral:</b>	2
	<p>Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording</p> <p>Early engagement required with Anglian Water to assess connection requirements and future investment required.</p> <p>Objection from some land owners as this site does not include all land to the West of March as identified as a strategic Allocation in the adopted Local Plan (SHELAA Ref 40007) that is available and deliverable</p>							
<b>LP39.02</b>	<b>Total:</b>	38	<b>Support:</b>	1	<b>Object:</b>	36	<b>Neutral:</b>	1
	<p>Significant objections received from local residents raising the following key issues:</p> <ul style="list-style-type: none"> <li>• Wrong location</li> <li>• Site disruption refers to land of southeast of 433 Wisbech Road, but this should be Land North of Estover Road.</li> <li>• Site refused planning permission in 2018 (F/YR15/0668/O. The Appeal was subsequently dismissed by the Inspectorate on 10th May 2019. There are no change that justifies the inclusion of this site as an allocation</li> <li>• Allocation of this site is in direct conflict with the March neighbourhood Plan (2017)</li> <li>• No facilities or services to support proposed growth</li> <li>• Concerns raised about increase traffic and Flood risk</li> <li>• Major intrusion into the open countryside</li> <li>• No justification for this in the sites evidence report</li> <li>• Misleading evidence base</li> </ul> <p>Support for the site as it is available and deliverable. It is in single ownership, no known technical constraints and it is located in a sustainable settlement, adjacent to playing fields and within walking distance of key services and facilities including the train station, a primary school and employment opportunities. It is also a short distance from the town centre.</p>							
<b>LP39.03</b>	<b>Total:</b>	4	<b>Support:</b>	3	<b>Object:</b>	1	<b>Neutral:</b>	0

	<ul style="list-style-type: none"> <li>• Support from landowner</li> <li>• Concerns new development should not butt up to existing properties.</li> <li>• Concerns about increase traffic and pollution</li> <li>• Need for more open space</li> <li>• Concerns about impact on wildlife</li> <li>• This site was part of adopted Local Plan requiring a co-ordinated approach, why can this site come forward in isolation. Prevent progress of wider site</li> <li>• Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording.</li> </ul>							
LP39.04	<b>Total:</b>	3	<b>Support:</b>	1	<b>Object:</b>	1	<b>Neutral:</b>	1
	Support from landowner This site was part of adopted Local Plan requiring a co-ordinated approach, why can this site come forward in isolation. Prevent progress of wider site							
LP39.05	<b>Total:</b>	1	<b>Support:</b>	1	<b>Object:</b>	0	<b>Neutral:</b>	1
	Planning Application submitted Forms a logical extension to the town							
LP39.06	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	0
	Grade II listed church located to the south of the site Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording							
LP39.07	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	No designated heritage assets within the site or nearby							
LP39.08	<b>Total:</b>	5	<b>Support:</b>	1	<b>Object:</b>	2	<b>Neutral:</b>	2
	Site forms a logical extension to LP39.18 which is being delivered. Allocation reflects the area in Flood Zone 1. Concerns about flood risk Development of this site would be an intrusion to the countryside							
LP39.09	<b>Total:</b>	3	<b>Support:</b>	0	<b>Object:</b>	2	<b>Neutral:</b>	1
	Site withdrawn by landowner							
LP39.10	<b>Total:</b>	2	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	1
	Concerns new development should not butt up to existing properties. Concerns about increase traffic and pollution Need for more open space Concerns about impact on wildlife							
LP39.11	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	No heritage assets within the site or nearby							
LP39.12	<b>Total:</b>	2	<b>Support:</b>	1	<b>Object:</b>	0	<b>Neutral:</b>	1
	This is an infill site that is available for development							
LP39.13	<b>Total:</b>	2	<b>Support:</b>	1	<b>Object:</b>	0	<b>Neutral:</b>	1

	Within the Market Town of March and a suitable location for growth Sustainable brownfield site							
LP39.14	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.15	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.16	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.17	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.18	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.19	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
LP39.20	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	0
	Need for open space							
LP39.21	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.22	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.23	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.24	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.25	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP39.26	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							

LP39.27	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b> 0
	Need for open space						
LP39.28	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b> 0
	Need for open space						
LP39.29	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 0
	No comments received						
LP39.30	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 0
	No comments received						
LP39.31	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 0
	No comments received						
LP39.32	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 0
	No comments received						
LP39.33	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 0
	No comments received						
<b>Policy LP40: Site Allocations for non-residential development in March</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	6	<b>Support:</b>	1	<b>Object:</b>	3	<b>Neutral:</b>	2
Some comments relate to specific sites or employment areas. These comments are covered as part of the relevant site/policy							
LP40.01	<b>Total:</b>	3	<b>Support:</b>	1	<b>Object:</b>	1	<b>Neutral:</b> 1
	Support from land owner of site to south of Tesco (SHELAA ref: 40495) and inclusion as part of the March Trading estate  Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording  Aa this is an existing employment area, the site contains Anglian water network assets						
LP40.02	<b>Total:</b>	3	<b>Support:</b>	2	<b>Object:</b>	0	<b>Neutral:</b> 1
	Support from landowner of the site. Support for a mix of employment uses and conclusion set out in the sites evidence report						
LP40.03	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 1
	No heritage assets						
LP40.04	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 1
	No heritage assets						

LP40.05	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 1
	Permitted use shown as A3 restaurant and café. This should be Ea with ancillary Eb						
LP40.06	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 0
LP40.07	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 1
	Question if this committed site is to be re allocated for shopping						
LP40.08	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 0
	No comments received						
LP40.09	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 0
	No comments received						
LP40.10	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b> 0
	No comments received						
<b>Policy LP41: Land of Knight's End Road and East of the A141 (Site LP39.01)</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	4	<b>Support:</b>	0	<b>Object:</b>	4	<b>Neutral:</b>	0
<p>The site (LP39.01) does not reflect all land available for development and as set out in the adopted Local Plan. The excluded land is now coming forward via planning applications</p> <p>Objection to reference to employment land as the approved Broad Concept Plan does not employment use.</p> <p>Need for updated infrastructure plan to support this policy.</p> <p>The policy wording should be amended to enable the approved, masterplan for the whole area to be implemented, and development of adjoining land not sterilized by lack of future proofing.</p> <p>Policy should include reference to the need for community facilities information by consultation with the NHS and health care commissioners.</p> <p>Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording.</p>							
<b>Policy LP42: Whittlesey – A Market Town fir for the Future</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	3	<b>Support:</b>	1	<b>Object:</b>	1	<b>Neutral:</b>	1
<p>This policy must include requirement to protect existing sports facilities and provision for additional facilities where needed.</p> <p>Objection to the limited scale of allocations in Whittlesey. Figures not based on an assessment of need. As identified in the Whittlesey Neighbourhood Plan</p> <p>Rejected sites - 40237 should be allocated as the site assessment does not take into account existing development.</p>							
<b>Policy LP43: Residential site allocations in Whittlesey</b>							
<b>Summary of Issues</b>							
<b>Total:</b>	4	<b>Support:</b>	0	<b>Object:</b>	4	<b>Neutral:</b>	0

<p>Sites identified in Whittlesey are already under construction or have planning permission. No future provision beyond 2030. More provision has been made for housing in Coates</p> <p>Rejected sites 40348 – land is available and deliverable</p>								
LP43.01	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	No heritage assets							
LP43.02	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	No heritage assets							
LP43.03	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP43.04	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP43.05	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP43.06	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
LP43.07	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
<b>Policy LP44: Site allocations for non-residential development in Whittlesey</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	5	<b>Support:</b>	1	<b>Object:</b>	2	<b>Neutral:</b>	2	
<p>Development within site allocations LP44.01 and LP44.20 are within the Consultation Area for the Must Farm MDA and Kings Dyke MAA.</p> <p><b>New Site Submission</b></p> <p>See SHELAA 40544 Whittlesey Science and Technology Park</p>								
LP44.01	<b>Total:</b>	2	<b>Support:</b>	1	<b>Object:</b>	0	<b>Neutral:</b>	1
	Support from land owner							
LP44.02	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	No heritage assets within the site or nearby							
LP44.03	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	Support from land owner							
LP44.03	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							



<b>LP44.04</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
<b>LP44.05</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
<b>Policy LP45: An Aspirational Community</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	7	<b>Support:</b>	1	<b>Object:</b>	4	<b>Neutral:</b>	2	
<ul style="list-style-type: none"> <li>• Significant concerns raised at the inclusion of a further 100ha of land as two 'broad locations' for employment growth to the south-west and north-east of Chatteris.</li> <li>• Policy is not clear who will have to prepare the master plans for the broad locations for employment growth.</li> <li>• Objection to need for a master plan. Policy should be criteria-based approach.</li> <li>• These sites are not deliverable and therefore do not meet the requirements of the NPPF</li> <li>• Developments proposed under Policy LP45 fall within the Consultation Areas for the Chatteris-Nightlayer Fen Water Recycling Centre (WRC) and the Furlong Farm Waste Management Area. Development will need to ensure that it does not prejudice the ongoing use of safeguarded sites as per Policy 16 of the MWLP</li> <li>• Support from landowners.</li> <li>• Support as the identified of the broad locations for future employment land can link with the proposed revisor to the north and location infrastructure and services for the revisor</li> </ul>								
<b>Policy LP46: Residential site allocations</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	166	<b>Support:</b>	153	<b>Object:</b>	9	<b>Neutral:</b>	3	
The following general issues raised about sites in Chatteris:								
<ul style="list-style-type: none"> <li>• Need for more infrastructure to support growth in Chatteris.</li> <li>• The planned expansion of the town will only contribute to existing traffic and infrastructure inadequacies</li> <li>• No account for walking and cycling infrastructure</li> <li>• The 2014 Broad Concept Plan should be included, questions about why the FDC land has been included.</li> <li>• Housing sites identified in policy LP46 fall short by 39 from the target set out in policy LP2.</li> <li>• Additional sites required to meet Local Plan growth strategy</li> </ul>								
<b>Wenny Road</b>								
Following issues raised specifically about Wenny Road								
<ul style="list-style-type: none"> <li>• Significant support for not allocating SHELAA site 40009 and 40284.</li> <li>• Site is of significant biodiversity and historic value to be lost. It is an important green space for residents</li> <li>• Over 1,000 people signed the petition during the issues and options consultation in October 2019</li> <li>• Recent parish poll 92% were against development on this site, and in favour of the Local Green Space designation for the whole site</li> <li>• Site used by local residents concerns as this is the only public green space</li> <li>• Need to keep green space</li> <li>• Site should not be included in the settlement boundary.</li> <li>• Live planning application (F/Y21/0981/F) has hundreds of objections containing further reasons</li> </ul>								

why the site is not suitable for development.

- 40284 – Land off Wenny Road – site is subject to a planning application for 93 homes, some support for this site to remain an allocation from the landowner and some members of the town council.

The policies map identifies a Local Green Space being created off Wenny Road Chatteris. This land is in private ownership with no public rights of access over it. The land has not been put forward by the landowner for Local Green Space use in isolation.

#### Rejected site:

- 40167 – support from Town Council
- 40317 - Land adjoining Huntingdon Road. Landowner objects to the omission of this site from the draft Local Plan allocation. It is a transitional site between residential and commercial uses and the allocation of the site could allow efficient use of redundant parcel of land.

#### New/Amended sites

Land south of Chatteris forms a logical second phase to a recently granted permission site LP46.11. (See SHELAA Ref 40552)

<b>LP46.01</b>	<b>Total:</b>	3	<b>Support:</b>	1	<b>Object:</b>	1	<b>Neutral:</b>	1
	Objection from town council due to unsuitable access Support from landowner who confirms the site is available and deliverable							
<b>LP46.02</b>	<b>Total:</b>	4	<b>Support:</b>	0	<b>Object:</b>	4	<b>Neutral:</b>	0
	Several objections raised that access to the site is unsuitable, and concerns about unsuitable drainage in the area.  Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording							
<b>LP46.03</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	No heritage assets within the site or nearby							
<b>LP46.04</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	No heritage assets within the site or nearby							
<b>LP46.05</b>	<b>Total:</b>	3	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	2
	EA recommend changes to policy wording to Direct 'more vulnerable' development to areas at lowest risk of flooding, taking into account all sources of flood risk and the impacts of climate change.  Policy refers to 'For the construction, access and maintenance of moorings and a turning area on Fenton Lode' It should be noted that neither Fillenhams Drain/Dents Diversion are navigable watercourses.							
<b>LP46.06</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	No heritage assets within the site or nearby							
<b>LP46.07</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0

<b>LP46.08</b>	No comments received							
<b>LP46.09</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	0
	Break in wildlife habitats							
<b>LP46.10</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
<b>LP46.11</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	0
	Land to the south of this site is suitable for second phase of development has the potential to make best use of this investment in infrastructure, sustain the growth of the town, and provide further infrastructure improvements.							
<b>LP46.12</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
<b>LP46.13</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
<b>Policy LP1: Employment allocations in Chatteris</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	5	<b>Support:</b>	2	<b>Object:</b>	1	<b>Neutral:</b>	2	
<p>Some employment areas/site are not shown on the policies map (are shown on the interactive version)</p> <p>Policy should include provision for tourism activities such restaurants and water sports for employment land towards the north for the proposed new reservoir</p> <p><b>New Sites:</b></p> <ul style="list-style-type: none"> <li>Honeysome Road Industrial Estate (SHELAA REF 40550) site located adjacent to existing Established Employment Area (EEA1)</li> <li>Land south of Chatteris forms a logical second phase to a recently granted permission site LP46.11. (See SHELAA Ref 40552)</li> </ul>								
<b>LP47.01</b>	<b>Total:</b>	2	<b>Support:</b>	1	<b>Object:</b>	1	<b>Neutral:</b>	0
	Support from landowner and share the Councils vision for the future economic vitality of the district and Chatteris and are fully committed to working with the Council and stakeholders to assist in the delivery of this.							
Policy should refer to nearby heritage assets and Historic England recommended the preparation at HIA to inform policy wording								
<b>LP47.02</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
	No heritage assets within the site or nearby							
<b>LP47.03</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	0
	Whilst no heritage assets within the area but careful consideration should be given to large scale development on the edge of this historic town. Historic England suggested changes to make reference to building colour and form to reduce impact.							
<b>LP47.04</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	1
<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0	

<b>LP47.05</b>	No comments received							
<b>LP47.06</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
<b>LP47.07</b>	<b>Total:</b>	0	<b>Support:</b>	0	<b>Object:</b>	0	<b>Neutral:</b>	0
	No comments received							
<b>LP47.08</b>	<b>Total:</b>	1	<b>Support:</b>	0	<b>Object:</b>	1	<b>Neutral:</b>	0
<b>Section 25: Large Villages</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>0</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>0</b>	<b>0</b>
No comments								
<b>Policy LP48: Residential site allocations in Doddington</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>7</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>5</b>	<b>Neutral:</b>	<b>2</b>	<b>2</b>
<ul style="list-style-type: none"> <li>Cambridgeshire County Council – Both local primary schools at Doddington and Wimblington are on restricted sites and have no scope for expansion. The Plan needs to demonstrate how this necessary infrastructure will be delivered. If the expansion cannot be delivered, the County Council will not be able to provide the primary school places needed in either village.</li> <li>Potential for sand and gravel to be located under site allocations LP48.02, 48.04, 48.06, 48.08, 48.09, 48.07 and 48.03. Development should make best use of any material incidentally extracted.</li> <li>Village does not have the infrastructure to support over 300 new houses over the next 10 years.</li> </ul>								
<b>Rejected sites:</b>								
Agents / owners for discounted sites at Bevills Close and 40142 (south of Benwick Road) seek inclusion in the Local Plan.								
<b>LP48.01</b>	<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>1</b>
	<ul style="list-style-type: none"> <li>Historic England - Policy should refer to nearby heritage assets and recommended the preparation of a Heritage Impact Assessment to inform policy wording.</li> <li>Doddington PC – Support in principle but too many houses on the site due to unsuitable roads and infrastructure. Need drastic reduction.</li> <li>Doddington Neighbourhood Plan Group - Excessive number of dwellings due to highway constraints, could be reduced by half with the remainder used for community. Require access to Fens Reservoir.</li> <li>Support from the proponents.</li> </ul>							
<b>LP48.02</b>	<b>Total:</b>	<b>6</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>4</b>	<b>Neutral:</b>	<b>1</b>
	<p>Objectors (including Doddington PC and Doddington NP Group):</p> <ul style="list-style-type: none"> <li>Existing traffic problems on Benwick Road made worse.</li> <li>Affect the important view of St. Mary's Parish Church and adversely impact its setting and that of the Conservation Area.</li> <li>Contrary to FDC's own Conservation Area Character Appraisal.</li> </ul>							

	<ul style="list-style-type: none"> <li>• Loss of wildlife habitat</li> <li>• Drainage problems and surface water constraints</li> <li>• Adjoining sites rejected and similarly should be excluded from the LP.</li> <li>• Policy not sound or justified.</li> </ul> <p>Support from the proponents for 55 dwellings.</p>								
<b>LP48.03</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>4</b></td> <td><b>Support:</b></td> <td><b>2</b></td> <td><b>Object:</b></td> <td><b>1</b></td> <td><b>Neutral:</b></td> <td><b>1</b></td> </tr> </table> <p>Historic England - Policy should refer to nearby heritage assets and recommended the preparation of a Heritage Impact Assessment to inform policy wording.</p> <p>Doddington Parish Council – support</p> <p>Doddington Neighbourhood Plan Group - object</p> <ul style="list-style-type: none"> <li>• Unsuitable for 40 dwellings.</li> <li>• Should be a Local Green Space or an important landscape feature in the village.</li> <li>• One of the few remaining locations where the countryside feels and therefore contributes significantly to the rural nature of the village.</li> <li>• May be capable for allotments for local residents. Currently used for informal recreation by villagers.</li> </ul> <p>Support from the proponents for 40 dwellings.</p>	<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>
<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>		
<b>LP48.04</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>4</b></td> <td><b>Support:</b></td> <td><b>1</b></td> <td><b>Object:</b></td> <td><b>3</b></td> <td><b>Neutral:</b></td> <td><b>0</b></td> </tr> </table> <p>Historic England - Policy should refer to nearby heritage assets and recommended the preparation of a Heritage Impact Assessment to inform policy wording.</p> <p>Doddington Parish Council and Doddington Neighbourhood Plan Group - object</p> <ul style="list-style-type: none"> <li>• Existing traffic problems on Benwick Road made worse.</li> <li>• Adversely affect the character and appearance of the Doddington Conservation Area and setting of listed buildings</li> <li>• Useful site for allotments</li> <li>• Would help to mitigate any disruption to wildlife by other development in the village</li> <li>• Contrary to legislation relating to heritage assets and would fail legal tests</li> <li>• Policy is not sound as it is not justified</li> </ul> <p>Support from the proponents for 31 dwellings.</p>	<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>0</b>
<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>0</b>		
<b>LP48.05</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>1</b></td> <td><b>Support:</b></td> <td><b>0</b></td> <td><b>Object:</b></td> <td><b>0</b></td> <td><b>Neutral:</b></td> <td><b>1</b></td> </tr> </table> <p>Doddington Parish Council – Already allocated so no comments.</p>	<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>		
<b>LP48.06</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>4</b></td> <td><b>Support:</b></td> <td><b>1</b></td> <td><b>Object:</b></td> <td><b>3</b></td> <td><b>Neutral:</b></td> <td><b>0</b></td> </tr> </table> <p>Historic England - Policy should refer to nearby heritage assets and recommended the preparation of a Heritage Impact Assessment to inform policy wording.</p> <p>Doddington Parish Council and Doddington Neighbourhood Plan Group – object</p> <ul style="list-style-type: none"> <li>• Excessive traffic and congestion as no direct walking or cycle route to the village centre</li> <li>• Unacceptable impact upon the setting of nearby Listed Buildings (including the Listed Windmill) and would severely harm the character and appearance of the Doddington</li> </ul>	<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>0</b>
<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>0</b>		

	<p>Conservation Area</p> <ul style="list-style-type: none"> <li>• Unable to satisfy the relevant legal and planning policy tests in relation to heritage impacts.</li> <li>• Loss of wildlife haven</li> <li>• Unable to achieve Biodiversity Net Gain requirements.</li> </ul> <p>Support from the proponents for 31 dwellings.</p>							
LP48.07	<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>1</b>
	<p>Historic England - Policy should refer to nearby heritage assets and recommended the preparation of a Heritage Impact Assessment to inform policy wording.</p> <p>Doddington Parish Council – Object</p> <ul style="list-style-type: none"> <li>• Additional access onto Wimblington Road needed for this back land development.</li> <li>• Currently a 40 mph road.</li> <li>• Totally alter the street scene on this part of Wimblington Road and would open the floodgates for further back land development along this part of Wimblington Road up to Brickmakers Arms Lane.</li> <li>• A very wet site, prone to flooding.</li> </ul> <p>Doddington Neighbourhood Plan Group – Neutral</p> <ul style="list-style-type: none"> <li>• May be an appropriate site for development but should not be linked to LP48.03 as that site is not suitable for housing development.</li> </ul>							
LP48.08	<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>0</b>
	<p>Historic England - Policy should refer to nearby heritage assets and recommended the preparation of a Heritage Impact Assessment to inform policy wording.</p> <p>Doddington Parish Council and the Doddington Neighbourhood Plan Group – Object</p> <ul style="list-style-type: none"> <li>• Phase 3 of development of Juniper Close will result in too many dwellings.</li> <li>• Excessive traffic and congestion as no direct walking or cycle route to the village centre</li> <li>• Unacceptable impact upon the setting of nearby Listed Buildings (including the Listed Windmill) and would severely harm the character and appearance of the Doddington Conservation Area</li> <li>• Unable to satisfy the relevant legal and planning policy tests in relation to heritage impacts.</li> <li>• Loss of wildlife haven</li> <li>• Unable to achieve Biodiversity Net Gain requirements.</li> </ul> <p>Support from the proponents.</p>							
LP48.09	<b>Total:</b>	<b>0</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>00</b>	<b>Neutral:</b>	
	No comments received.							
<b>Policy LP49: Residential site allocations in Manea</b>								
<b>Summary of Issues</b>								
<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>		
No comments received.								
	<b>Total:</b>		<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>

<b>LP49.01</b>	Historic England – no comments.							
	Objections: <ul style="list-style-type: none"> <li>• Too large an allocation at Wisbech end of village.</li> <li>• Allocation on goose and swan functional land.</li> <li>• Allocation should be for frontage development only.</li> </ul>							
	Support from the proponent.							
	<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>2</b>
<b>LP49.02</b>	Historic England – no comments.							
	RSPB							
	<ul style="list-style-type: none"> <li>• A project level HRA needs to be undertaken – this needs to be included in the policy wording. Under case law, mitigation cannot be taken into consideration before the likely significant effect test has been applied (in effect HRA screening).</li> <li>• Need documentation outlining the habitats present on the site.</li> <li>• Unclear where the policy wording for the need for significant mitigation and compensation to achieve Biodiversity Net Gain is coming from.</li> <li>• Consider wording is unhelpful, as mitigation and compensation for environmental impact should be considered as a separate process from BNG.</li> </ul>							
	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
<b>LP49.03</b>	No comments received.							
	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
<b>LP49.04</b>	No comments received.							
	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
<b>LP49.05</b>	No comments received.							
	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
<b>LP49.06</b>	No comments received.							
<b>Policy LP50: Residential site allocations in Wimblington</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>5</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>2</b>	
	<ul style="list-style-type: none"> <li>• Cambridgeshire County Council – Both local primary schools at Doddington and Wimblington are on restricted sites and have no scope for expansion. The Plan needs to demonstrate how this necessary infrastructure will be delivered. If the expansion cannot be delivered, the County Council will not be able to provide the primary school places needed in either village.</li> <li>• Potential for sand and gravel to be located under site allocations LP50.01, 50.02, 50.04, 50.03, and 50.05. Development should make best use of any material incidentally extracted.</li> </ul>							
	<b>Rejected sites</b>							
	Proponents for 40324, 40219, 40217, 40229, 40488 and 40496 object to exclusion of sites from the Local Plan.							
	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
<b>LP50.01</b>	Historic England – no comments.							

LP50.02	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	Historic England – no comments.							
LP50.03	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	No comments received.							
LP50.04	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	No comments received.							
LP50.05	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	No comments received.							
LP50.06	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	No comments received.							
<b>Section 26: Medium Villages</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>0</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>0</b>	
No comments								
<b>Policy LP51: Residential site allocations in Coates</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>3</b>	<b>Support:</b>		<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>1</b>	
Cambridgeshire County Council – Objects								
<ul style="list-style-type: none"> <li>The existing primary school at Coates is on a restricted site which has no potential for expansion beyond its current capacity of 210 places.</li> <li>Policy does not provide any certainty regarding the provision of a suitable alternative site (2.4ha is required) for the replacement school.</li> <li>Concerns about the viability of this strategy as no indication how both the replacement and additional school places will be funded.</li> </ul>								
There is the potential for sand and gravel to be located under all LP51 sites (51.01, 51.02, 51.03, 51.04). Development should make best use of any material incidentally extracted.								
<ul style="list-style-type: none"> <li>Large areas identified for housing development in Whittlesey are all either under development already or will be within 12 months or so. No provision has been made for any new large housing sites in Whittlesey when existing sites are fully developed.</li> <li>However, provision has been made for approximately 439 houses in Coates which would be an increase in Coates' population in excess of 1,000, which is close to a doubling of the present population.</li> <li>Unfair to expect Coates to take strain of new housing.</li> <li>Sites LP51.01 (for residential) and LP52.01 (employment) in Coates are in open countryside and should not be allocated. Previously permission for commercial development for the site on the corner of March Road and Eldernell Lane does not justify allocating two adjoining sites.</li> </ul>								
LP51.01	<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>1</b>
	Historic England - No comments							
<ul style="list-style-type: none"> <li>Draft allocation too large for Limited Growth Village.</li> </ul>								



	<ul style="list-style-type: none"> <li>• Not in a logical location.</li> <li>• On goose &amp; swan functional land.</li> <li>• South Green has constant sewage problems.</li> <li>• Coates school is at near capacity and needs to be able to cope with the developments happening now and, in the future.</li> <li>• Any school relocation will leave the school land open to more development.</li> <li>• Sites LP51.01 is in open countryside and should not be allocated. Permission granted for commercial development for the site on the corner of March Road and Eldernell Lane does not justify development of the two adjoining sites.</li> </ul> <p>Proponents support allocation.</p>								
	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>3</b></td> <td><b>Support:</b></td> <td><b>0</b></td> <td><b>Object:</b></td> <td><b>1</b></td> <td><b>Neutral:</b></td> <td><b>2</b></td> </tr> </table> <p>Historic England - There are no designated heritage assets within the site boundary. The Conservation Area lies to the west of the site but with sufficient development between so there will be minimal impact. No comments.</p> <p>RSPB</p> <ul style="list-style-type: none"> <li>• Whilst recognising the need for this proposal to mitigate any evidenced recreational impacts on the Nene Washes SPA, this needs to be done in the context of a project level HRA, and the policy wording should reflect this.</li> <li>• Case law indicates that mitigation cannot be taken into account at the Likely Significant Effect (screening) stage of this process.</li> <li>• Unclear why the specific wording on BNG is included, as this will be a compulsory element for proposals, and believe the mitigation/compensation wording is unhelpful in this context.</li> </ul> <p>Other comments</p> <ul style="list-style-type: none"> <li>• Draft allocation too large for Limited Growth Village.</li> <li>• Not in a logical location.</li> <li>• On goose &amp; swan functional land.</li> </ul>	<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>2</b>
<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>2</b>		
<b>LP51.02</b>									
	<table border="1"> <tr> <td><b>Total:</b></td> <td></td> <td><b>Support:</b></td> <td></td> <td><b>Object:</b></td> <td></td> <td><b>Neutral:</b></td> <td></td> </tr> </table> <p>No comments received.</p>	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>			
<b>LP51.03</b>									
	<table border="1"> <tr> <td><b>Total:</b></td> <td></td> <td><b>Support:</b></td> <td></td> <td><b>Object:</b></td> <td></td> <td><b>Neutral:</b></td> <td></td> </tr> </table> <p>No comments received.</p>	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>			
<b>LP51.04</b>									
<b>Policy LP52: Employment allocations in Coates</b>									
<b>Summary of Issues</b>									
<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>		
Cambridgeshire County Council									
There is the potential for sand and gravel to be located under all LP52 sites. Development should make best use of any material incidentally extracted.									
	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>3</b></td> <td><b>Support:</b></td> <td><b>1</b></td> <td><b>Object:</b></td> <td><b>1</b></td> <td><b>Neutral:</b></td> <td><b>1</b></td> </tr> </table> <p>Historic England - No comments</p> <p>Sites LP52.01 is in open countryside and should not be allocated. Permission granted for commercial development for the site on the corner of March Road and Eldernell Lane does not justify development of the two adjoining sites.</p>	<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>
<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>		
<b>LP52.01</b>									

Proponents support allocation.

**Policy LP53: Residential site allocations in Elm**

**Summary of Issues**

<b>Total:</b>	<b>6</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>5</b>	<b>Neutral:</b>	<b>1</b>
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A significant number of objections have been received about the proposed allocations in Elm:

- Village will lose its appeal if it becomes crowded.
- Will ruin village, leave it as is.
- Affect property values.
- Adversely affect everyone living in the village. Very unpopular
- Village infrastructure cannot cope now.
- Roads simply not sufficient for the traffic involved – roads over a century old
- School not big enough to accommodate more pupils, already full.
- Begdale Road is a rat run for traffic, no more than a country lane, already very poor.
- No health centre this side of Upwell or Wisbech.
- No police.
- Have just one little convenience store.
- Hardly any buses.
- Will be so much more traffic and people with no extra amenities.

Proponents support allocation.

<b>Total:</b>	<b>35</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>33</b>	<b>Neutral:</b>	<b>1</b>
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**LP53.01**

Historic England - Large site lies adjacent to the Elm Conservation Area and close to a number of designated heritage assets including the grade I listed All Saints Church, grade II\* Elm House and a number of grade II listed buildings and structures. Any development has the potential to impact these heritage assets and their settings. Recommend FDC prepare an HIA with findings used to inform the policy wording.

Elm Parish Council - village is already unrecognisable due to extensive residential development that has occurred in recent years. Have been no perceivable improvements to infrastructure which has added strain to local services. Proposed scale of development is impossible without large scale additional infrastructure, including improvements to highway safety, educational facilities, public transport, access to medical facilities.

Significant number of objections relating to:

- Allocation is too large for existing Limited Growth Village.
- Already a lot of new developments in the village with no facilities, will only add more hurt and ruin to this once beautiful village.
- Loss of peace and quiet. Devalue property.
- Not in keeping with the village appearance. Out of character.
- Loss of view, including traditional Fenland view of openness.
- Adverse impact on historic buildings and heritage. Archaeological investigations needed.
- Adversely affect everyone living in the village, rise in crime and antisocial behaviour rates. Very unpopular, insufficient notice
- Lack of suitable infrastructure, cannot cope now.

	<ul style="list-style-type: none"> <li>• Roads simply not sufficient for the traffic involved. Begdale Road is a rat run for traffic, no more than a country lane, already very poor. Not wide enough to cater with a larger volume of traffic. Already difficult for two cars to pass.</li> <li>• Unsafe road, lack of footpaths in village, access in 60mph zone, traffic already busy in this small village.</li> <li>• Village already a cut through for many lorries etc.</li> <li>• Congestion at the roundabout on the A47 is horrendous now, will cause even more delays.</li> <li>• School not big enough to accommodate more pupils, already full.</li> <li>• No doctor's surgery or dentists in the village or connecting villages with residents having to use the facilities in Wisbech which are already at breaking point. No police.</li> <li>• Power lines and pylons cross the site. The International Agency for Research on Cancer has advised there is a possible cause of childhood Leukaemia for those who live near power lines. Major works to move overhead pylon lines or reposition them.</li> <li>• Fields often flood, new development will flood existing houses.</li> <li>• Noise and pollution during construction, including lorry movements and piling.</li> <li>• Destroy wildlife including habitat for protected species. Bats, owls, water voles, reptiles, newts, birds (breeding and wintering) and roaming deer affected.</li> <li>• Loss of open land. Should not build on best agricultural land in the country in time of food needs.</li> <li>• No provision towards government's net zero ambitions.</li> </ul> <p>Neutral: Would be positive to have more families in the village but infrastructure needs upgrading.</p> <p>Proponents support allocation for 215 dwellings.</p>								
<b>LP53.02</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>1</b></td> <td><b>Support:</b></td> <td><b>0</b></td> <td><b>Object:</b></td> <td><b>1</b></td> <td><b>Neutral:</b></td> <td><b>0</b></td> </tr> </table> <p>Elm Parish Council - Elm village cannot accommodate further large-scale developments without significant improvements to infrastructure. This site is also unsuitable as the surrounding area has suffered incidents of severe surface water flooding in recent years.</p>	<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>
<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>		
<b>LP53.03</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td></td> <td><b>Support:</b></td> <td></td> <td><b>Object:</b></td> <td></td> <td><b>Neutral:</b></td> <td></td> </tr> </table> <p>No comments received.</p>	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>			
<b>Policy LP54: Residential site allocations in Friday Bridge</b>									
<b>Summary of Issues</b>									
<b>Total:</b>	<b>5</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>4</b>	<b>Neutral:</b>	<b>0</b>		
<p><b>Objections</b> Total of 230 dwellings are proposed for Friday Bridge over three sites including one close to a listed building and non-designated heritage assets. Small application for four dwellings was refused recently so cannot see justification for such a large increase.</p> <p>Proponents support allocation.</p> <p><b>Rejected sites</b> Proponents for sites 40293 and 40296, seek inclusion in the Local Plan.</p>									
<b>LP54.01</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>4</b></td> <td><b>Support:</b></td> <td><b>1</b></td> <td><b>Object:</b></td> <td><b>3</b></td> <td><b>Neutral:</b></td> <td><b>0</b></td> </tr> </table> <p>Historic England</p>	<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>0</b>
<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>0</b>		

	<p>Whilst there are no designated heritage assets within the site boundary, the grade II listed St Marks Church lies to the south west of the site. Any development has the potential to impact these heritage assets and their settings. Recommend FDC prepare an HIA with findings used to inform the policy wording.</p> <p>Elm Parish Council Development on this scale is too large for the village of Friday Bridge. Massive improvements in infrastructure would be required in order to support the increased population. In particular, improvements to highways, educational &amp; medical facilities, public transport services.</p> <p>Others</p> <ul style="list-style-type: none"> <li>• Roads unable to take all these extra cars.</li> <li>• Traffic from these new builds in Friday Bridge and Elm will be cause chaos at Elm Hall Roundabout on the A47.</li> </ul> <p>Proponents support allocation.</p>							
	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
<b>LP54.02</b>	<p>Historic England Whilst there are no designated heritage assets within the site, the grade II Rookery Farmhouse lies to the west of the site. Development would cut the farmhouse off from its agricultural setting. Any development has the potential to impact these heritage assets and their settings. Recommend FDC prepare an HIA with findings used to inform the policy wording.</p> <p>Elm Parish Council Development on this scale is too large for the village of Friday Bridge. Massive improvements in infrastructure would be required in order to support the increased population. In particular, improvements to highways, educational &amp; medical facilities, public transport services.</p> <p>Others</p> <ul style="list-style-type: none"> <li>• Roads won't be able to take all the extra cars.</li> <li>• Elm Hall Roundabout on A47 will be gridlocked for even longer than it is now at peak times.</li> </ul> <p>Proponents support allocation.</p>							
<b>LP54.03</b>	<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>0</b>
	Proponents support allocation.							
<b>Policy LP55: Residential site allocations in Gorefield</b>								
<b>Summary of Issues</b>								
<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>		
No comments received.								
<b>LP55.01</b>	<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>2</b>
	<p>Historic England – Neutral Whilst there are no designated heritage assets within the site, the grade II listed St Pauls Church lies to the southwest of the site. However, given the distance and intervening development, the impact on the heritage assets is likely to be minimal.</p>							
	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	

<b>LP55.02</b>	No comments received.							
<b>LP55.03</b>	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	No comments received.							
<b>Policy LP56: Residential site allocations in Leverington</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>1</b>	
<p>Leverington Parish Council – Objects</p> <ul style="list-style-type: none"> <li>• Leverington is classed as a medium village in the report but has always been a low (smaller) village.</li> <li>• Over development of this rural village</li> <li>• Will spoil the peaceful environment.</li> <li>• Lack of infrastructure to support all this development (circa 200 dwellings) – no doctor’s surgery, no school places available - some Leverington children have to go to Wisbech Peckover now.</li> <li>• Roads not wide enough for a cycle/mobility route.</li> <li>• Village roads are mainly lanes and will not take the extra weight of traffic.</li> <li>• Sites proposed are prone to flooding in the winter months.</li> </ul> <p>Proponents support allocation.</p> <p><b>Rejected sites</b> Proponents for sites 40256 and 40227 object to their exclusion from the Local Plan.</p>								
	<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>3</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
<b>LP56.01</b>	<p>Historic England - No comments.</p> <p>Proponents support allocation and make the case for the inclusion of additional land adjacent to the east of LP56.01 in the Local Plan:</p> <ul style="list-style-type: none"> <li>• Would extend site size extending by a further 2.48 ha to 6.09 ha.</li> <li>• If left, would remain difficult for cultivation with modern farming practices.</li> <li>• Provide a more comprehensive scheme, with the opportunity to include additional open space, community benefits, and some biodiversity net gain.</li> </ul>							
	<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>
<b>LP56.02</b>	<p>Historic England - No comments.</p> <p>Objection:</p> <ul style="list-style-type: none"> <li>• Relates poorly to the existing built form.</li> <li>• Would be the only development that side of the road.</li> <li>• Better sites are available and deliverable that relate better to the settlement.</li> <li>• Too large for existing Limited Growth Village.</li> </ul>							
<b>Policy LP57: Residential site allocations in Parson Drove</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>	
<p>Parson Drove Parish Council – Objects</p> <ul style="list-style-type: none"> <li>• Very disappointed FDC has not allocated sites supported by the Parish Council and is promoting sites that the Parish Council opposed.</li> <li>• As there is a Neighbourhood Plan for Parson Drove particular attention should be paid to the views of the Parish Council, which has not happened.</li> </ul>								

- FDC have therefore not considered this appropriately and the selection of sites is flawed.
- Site 40224 - Brewery Close / Ingham Hall Gardens- not appropriate given the scale of the proposal and result in backland development. Would also have a major impact on the shape and form of Parson Drove and also close the gap between Parson Drove and Murrow. Site recently refused planning permission due to being in open countryside which does not accord with existing Fenland Local Plan and Neighbourhood Plan where it does not have support of the Parish Council or community.
- Site 40260 - North of Fen Road - Site not appropriate given requirement to use Swan Bridge junction, which is an accident hotspot and would result in back land development. This site has been rejected in the past due to increased traffic levels in the vicinity of Swan Bridge.
- Sites supported by the Parish Council have not been taken forward (Site 40204, Site 40100, Site 40166); these are considered to be in keeping with the aims of the Parson Drove Neighbourhood Plan.

Proponents support allocation LP57.02.

	<b>Total:</b>	<b>10</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>9</b>	<b>Neutral:</b>	<b>1</b>
<b>LP57.01</b>	<p>Historic England – Neutral</p> <p>Whilst there are no designated heritage assets within the site, the Parson Drove Conservation Area and a number of grade II listed buildings are to the north of the site. However, given the intervening development, the impact on the heritage assets is likely to be minimal.</p> <p>Objections:</p> <ul style="list-style-type: none"> <li>• Unsuitable site for 30 dwellings.</li> <li>• Create noise, traffic, pollution and impact on the quality of life of residents. Adverse effect on residents’ mental health. Large proportion of elderly in cul-de-sac. Loss of privacy.</li> <li>• Access to the site not straight forward - if via Brewery Close/Ingham Hall Gardens, Brewery Close is a private road for which some of the owners contribute towards its maintenance - any further costs from wear would be unacceptable. If via Ingham Hall Gardens and the small access road to the rear of Nos. 24, 22 and 41 then the right of access/ ownership of this road is unclear. Owners of the land to the rear have right of access for agricultural and maintenance use but not specifically to access future development.</li> <li>• Infrastructure of village unable to cope with number of dwellings proposed.</li> <li>• Roads lack capacity. Access from Main Road already a dangerous junction.</li> <li>• Result in additional traffic as there is extremely limited public transport serving the village.</li> <li>• Carbon footprint increased.</li> <li>• Drainage/waste is inoperable for the present properties in Ingham Hall Gardens. A tractor with a waste tank empties this daily.</li> <li>• No logic to site selection e.g. number of sites rejected due to no capacity in the local school but this one site would be more than the others combined.</li> <li>• Local GP surgery already under strain.</li> <li>• Loss of valuable, under-developed agricultural land</li> <li>• Loss of habitat for a wide variety of wildlife including deer, foxes, owls and many species of birds and bats. Each "small" diminution of their habitat puts additional pressure on their survival.</li> <li>• Homes should not be to the detriment of the wildlife or mental health.</li> <li>• Proposal for 9 properties rejected earlier this year.</li> <li>• Contrary to Sustainability Objectives 3 (Transport), 6.1 (Need land for agricultural produce), 8 (Pollution and Waste) and 4.3 (Retain distinctive character of Fenland’s</li> </ul>							

	landscape).							
<b>LP57.02</b>	<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
	<p>Historic England - Whilst there are no designated heritage assets within the site, the Parson Drove Conservation Area and a number of grade II listed buildings to the east of the site. However, given the intervening development, the impact on the heritage assets is likely to be minimal.</p> <p>Proponents support allocation.</p>							
<b>LP57.03</b>	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	No comments received.							
<b>Policy LP58: Residential site allocations in Wisbech St Mary</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>	
<b>Rejected site</b>								
Proponent of site 40169 (North of Chapel Avenue) objects to exclusion from the Local Plan and seeks its inclusion.								
<b>LP58.01</b>	<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>
	<p>Historic England - No comments</p> <p>Wisbech St Mary Parish Council - Objects to the size of development due to inadequate access points and will result in increased traffic levels in the vicinity.</p>							
<b>LP58.02</b>	<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>
	<p>Historic England - No comments</p> <p>Wisbech St Mary Parish Council – Objects to this site as it extends the growth of the village via back land development into the open countryside. Development on the ‘Old Coal Yard’ has historically been recommended for refusal by the Parish Council for this reason and that of inadequate access onto Station Road.</p> <p>Proponents support allocation.</p>							
<b>LP58.03</b>	<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>1</b>
	<p>Historic England - Significant concerns</p> <p>Whilst there are no designated heritage assets within the site boundary, the site is opposite the grade II* listed Manor House. Part of the setting of the manor house is the open land on the opposite side of the road. Any development of the site has the potential to impact the heritage asset and its setting. Recommend FDC prepare an HIA which should then be used to inform the policy wording. Subject to the findings of the HIA it may not be suitable for allocation.</p> <p>Wisbech St Mary Parish Council – No objections.</p> <p>Support:</p>							

	<ul style="list-style-type: none"> <li>Housing development has been arranged in such a way that it does not affect the visual splay or spatial views of the listed Manor House.</li> </ul> <p>Objection:</p> <ul style="list-style-type: none"> <li>Would result in substantial harm to the setting and significance of the Grade II* listed Manor House.</li> <li>Therefore, neither in accordance with emerging and adopted heritage policies contained within Fenland's local development plan nor the National Planning Policy Framework (2021).</li> <li>Does not relate to a positive strategy for the conservation and enjoyment of the historic environment in accordance with paragraph 190 of the NPPF.</li> <li>Plan has not taken into account the desirability of sustaining and enhancing the significance of the importance the Manor House, nor consideration of the wider social, cultural and environmental benefits that conservation could bring.</li> <li>Previous refusals on site.</li> <li>Seek clarification relating to flood risk zones.</li> </ul>								
<b>LP58.04</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>1</b></td> <td><b>Support:</b></td> <td><b>0</b></td> <td><b>Object:</b></td> <td><b>0</b></td> <td><b>Neutral:</b></td> <td><b>1</b></td> </tr> </table> <p>Wisbech St Mary Parish Council - no objections as the site is already being developed.</p>	<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>		
<b>LP58.05</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>1</b></td> <td><b>Support:</b></td> <td><b>0</b></td> <td><b>Object:</b></td> <td><b>0</b></td> <td><b>Neutral:</b></td> <td><b>1</b></td> </tr> </table> <p>Wisbech St Mary Parish Council - no objections as the site already has planning permission.</p>	<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>		
<b>LP58.06</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>1</b></td> <td><b>Support:</b></td> <td><b>0</b></td> <td><b>Object:</b></td> <td><b>0</b></td> <td><b>Neutral:</b></td> <td><b>1</b></td> </tr> </table> <p>Wisbech St Mary Parish Council - no objections as the site is already being developed.</p>	<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>		
<b>Section 27: Small Villages</b>									
<b>Summary of Issues</b>									
<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>			
<b>Policy LP59: Residential site allocations in Christchurch</b>									
<b>Summary of Issues</b>									
<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>		
<p>Christchurch Parish Council – Object</p> <ul style="list-style-type: none"> <li>Concerns regarding the potential impact of the plan on life in Christchurch.</li> <li>Restrictive nature of proposed settlement boundary and scarcity of available sites for development will stifle the natural growth that is necessary for the long-term sustainability of the village.</li> <li>Of the four potential sites for residential development, legal hurdles and contamination may prevent two of those from being delivered.</li> <li>PC want to encourage development at the northern end of the village in the vicinity of the Community Centre, with its recreation ground and children's playground, as well as easy access to Townley School.</li> <li>A more flexible approach to the settlement boundary is required.</li> <li>Want to work with FDC officers to consider all options to facilitate this and request further discussions.</li> </ul>									
<b>LP59.01</b>	<table border="1"> <tr> <td><b>Total:</b></td> <td><b>3</b></td> <td><b>Support:</b></td> <td><b>2</b></td> <td><b>Object:</b></td> <td><b>0</b></td> <td><b>Neutral:</b></td> <td><b>1</b></td> </tr> </table> <p>Historic England - Although the grade II listed Old Post Office lies to the northeast of the site,</p>	<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>2</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>		



	<p>the intervening new development means that any new development of the site will have minimal impact on the setting of the Old Post Office.</p> <p>Support:</p> <ul style="list-style-type: none"> <li>Part of this land is a commitment and already developed with 3 units. The remainder is in developers' hands and negotiations are well advanced for access provision from Fen View.</li> <li>Aware the land is both available and deliverable.</li> <li>Rounding off development in this location is appropriate in relation to the built form of the village.</li> </ul> <p>Proponents support allocation.</p>							
<b>LP59.02</b>	<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
	Historic England – No comments							
<b>LP59.03</b>	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	No comments received.							
<b>LP59.04</b>	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	No comments received.							
<b>Policy LP60: Residential site allocations in Eastrea</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>2</b>	
<p>Cambridgeshire County Council - There is the potential for sand and gravel to be located under site LP60.01. Development should make best use of any material incidentally extracted.</p> <p>Proponents for site Land South of Jones Lane (40376) inclusion in the Local Plan.</p> <p><b>Rejected site</b> Proponents for land submission 40233 seek the site for inclusion in the Local Plan.</p>								
	<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
<b>LP60.01</b>	Cambridgeshire County Council - Potential for sand and gravel to be located under this site. Development should make best use of any material incidentally extracted.							
<b>Policy LP61: Residential site allocations in Guyhirn</b>								
<b>Summary of Issues</b>								
<b>Total:</b>	<b>5</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>1</b>	
<p>Wisbech St Mary Parish Council – support an unallocated site (40486, Land east of Gull Road) on the following grounds:</p> <ul style="list-style-type: none"> <li>Site is in a prime location for development in Guyhirn. There is development on either side and recommend flood alleviation measures to make this site a viable option.</li> </ul> <p>Proponents support inclusion of LP61.02 as an allocation.</p> <p><b>Rejected sites</b> Proponents for land submissions 40230 and 40486 seek inclusion of the sites in the Local Plan.</p>								

<b>LP61.01</b>	<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>1</b>
	<p>Historic England - No comments</p> <p>Wisbech St Mary Parish Council – Objects Opposed to development on this site due to the removal of a village green space and contamination issues as it was historically an old pit.</p> <p>Other objections:</p> <ul style="list-style-type: none"> <li>• Land has been farmed for over 100 years by 3 generations of family whilst being a council tenant.</li> <li>• Would be morally wrong and also have an impact on the community.</li> <li>• Cattle have grazed this land in the summer for over 35 years. These fields are part of the culture of the community.</li> <li>• Loss of trees and wildlife habitat.</li> <li>• Unsuitable for development due to dykes and drains.</li> <li>• Access would be onto a main road where the speed limit is 60 mph with sharp bends. Unsafe for 10 houses to use.</li> <li>• Neither Wisbech St Mary nor Guyhirn can cope with more houses.</li> <li>• Would put even more strain on the local schools and amenities which already cannot cope with the continued building work and influx of people into this area.</li> </ul>							
<b>LP61.02</b>	<b>Total:</b>	<b>5</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>4</b>	<b>Neutral:</b>	<b>0</b>
	<p>Historic England Whilst there are no designated heritage assets within the site boundary, the grade II* Chapel of Ease lies within the Cemetery immediately to the west of the site. Any development of the site has the potential to impact the heritage asset and its setting. Recommend FDC prepare an HIA and use the conclusions to inform the policy wording.</p> <p>Wisbech St Mary Parish Council - Objects</p> <ul style="list-style-type: none"> <li>• Very concerned FDC has determined this site as suitable for the growth of Guyhirn.</li> <li>• Would allow backland development adjacent to the Guyhirn amenity fields.</li> <li>• Area has just had over £200,000 spent on its development for the betterment of the village and to allow residential development here would be against the wishes of both the Parish Council and the Guyhirn Playing Field Association.</li> </ul> <p>Guyhirn Playing Field Committee - Objects</p> <ul style="list-style-type: none"> <li>• Our community hall and playing field utilise the shared access which will be required to access the development.</li> <li>• The track is a single car width which is used by vehicles and pedestrians so using for dwellings will lead to potential problems.</li> <li>• Currently utilise a section of the allocation for parking (football matches, community events, etc), and to lose this would create issues with vehicle parking and access to both the field and dwellings.</li> <li>• Due to close proximity to the field and community hall will lead to noise and light pollution concerns of the occupiers of the dwellings.</li> <li>• There are better locations for dwellings in the village.</li> </ul> <p>Proponents support inclusion of site as an allocation.</p>							
<b>LP61.03</b>	<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>2</b>

	Historic England - No comments.
	Wisbech St Mary Parish Council - No objections

**Policy LP62: Residential site allocations in Murrow**

**Summary of Issues**

<b>Total:</b>	<b>3</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>2</b>	<b>Neutral:</b>	<b>1</b>
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Object:

- There should be more and/or larger allocations to sustain the existing village amenities.
- Development Area Boundary should include allocation of land to the rear of 1-3 Back Road, Murrow as a logical 'rounding off' of the D.A.B. and allow building opportunity within the village.

**Rejected Sites**  
Proponents for land submissions 40219 and 40231 seek inclusion of the sites in the Local Plan.

<b>LP62.01</b>	<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>1</b>
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Historic England - Whilst there are no designated heritage assets within the site boundary, Hollycroft Farmhouse and the converted Church of Corpus Christ, both listed at grade II, lie to the west of the site. Any development of the site has the potential to impact the heritage assets and their settings. Recommend FDC prepare an HIA and use the conclusions to inform the policy wording.

Wisbech St Mary Parish Council - Raise no objections but recommend sympathetic development in keeping with the other recent builds along Front Road. As the site is opposite mainly bungalows then any development should be of the same.

**Policy LP63: Residential site allocations in Tydd St Giles**

**Summary of Issues**

<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>3</b>	<b>Neutral:</b>	<b>1</b>
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Tydd St Giles Parish Council – Objects

- Restrictive nature of proposed settlement boundary and the complete absence of available sites for future development will stifle the natural growth that is necessary for the long-term sustainability of the village.
- More than thirty dwellings have been built in the village during the last decade and the Parish Council considers this level to be appropriate for the future.
- The only site identified in the Draft Plan is for seven dwellings currently nearing completion.
- More flexible approach to the settlement boundary is required.
- Reconsider description of the village rather than that in the draft Local Plan to be a more thriving location with employment opportunities. Designation of medium village would be more appropriate.
- Unclear about the meaning of Policy LP1 Part C, and new hinterland development provisions.
- Want to work with FDC officers about revisions needed.

Other Objections:

- Plan is contradictory and lacks certainty, definitive instruction and direction. Part C of LP1 'Frontage Infill Development' and the 'Settlement Hinterland' policy will open the floodgates for a barrage of planning applications with no defence.
- Tydd St Giles will become a magnet for every developer to bring in linear developments and destroy this unique settlement.
- Will destroy the Fenland landscape and small village settlement patterns.

- Is contrary to other stated ambitions of the Draft Local Plan and does not conform with NPPF.
- Refers to and uses out-of-date information. Need public audit of house building in village in the last 12 years.
- Poorly maintained infrastructure not addressed.
- As a small village, Tydd St Giles cannot cope. Very limited services.
- Increase the amount of commuter traffic.
- Will perpetuate poor planning controls leading to over-development.
- Discord and divisiveness in village exist relating to development proposals, planning strategy and decision making which promotes poor community health.
- Need more allocations, not just one site for 7 dwellings in Hockland Road.

**Rejected site**

Proponents for land submission 40489 seeks inclusion of the site in the Local Plan.

<b>LP63.01</b>	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
	No comments received.							

**Policy LP64: Residential site allocations in Coldham**

**Summary of Issues**

<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	
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No comments received.

<b>LP64.01</b>	<b>Total:</b>	<b>2</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
	Historic England - No comments							
	Support from proponents and suggest extending site further north.							

**Policy LP65: Residential site allocations in Collett's Bridge**

**Summary of Issues**

<b>Total:</b>	<b>4</b>	<b>Support:</b>	<b>3</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>
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**Objection**

Decision of the FDC planning committee in April 22 to reject F/YR21/1536/O includes many further reasons to reject all proposed sites in Collett's Bridge from the new local plan.

**Rejected sites**

Support for sites 40361 and 40474 for inclusion in the Local Plan.

<b>LP65.01</b>	<b>Total:</b>	<b>19</b>	<b>Support:</b>	<b>1</b>	<b>Object:</b>	<b>17</b>	<b>Neutral:</b>	<b>1</b>
	Historic England - No comments							
	Significant number of objections received: <ul style="list-style-type: none"> <li>• Colletts Bridge is a quiet and well-designed hamlet. Will ruin the tranquillity and quality of life and spoil the whole area.</li> <li>• Be to the detriment of the character and appearance of the area.</li> <li>• Devalue homes.</li> <li>• Gosmoor Lane is a heavily used road used by heavy lorries, farm machinery and speeding cars and is not wide enough for two vehicles or a centre line.</li> <li>• Heavy goods traffic operates 24-7. Used for lorries going to Fen Marc packaging plant.</li> <li>• Route used as a rat run to avoid the constant traffic jams on the main road. Current speed limit is 60mph.</li> </ul>							

- Has no pathways and nowhere to place a footpath. Dykes either side of lane cannot be filled in as this would be in contravention of the Drainage Board.
- Junction of Colletts Bridge Lane and Gosmoor Lane has very poor visibility and is precarious. A danger for vehicles, cyclists, walkers & horse riders. Numerous near misses.
- Additional traffic will add to unsafe problems. Very bad lighting.
- Site constantly flooding due to drainage from other lanes and land. A run-off for all water, lowest point in this area. Changes from climate change should be considered.
- No services in village – need to drive to all.
- Nearest bus stop is a 25 min walk to Elm, not a 5-minute walk as claimed.
- No pavements or services within 10-15 mins walk.
- No school places and oversubscribed dentists and doctors; more houses will cause overload.
- A wildlife haven. Loss of wildlife including hedgerow and drain habitats.
- Prime growing land, which should not be built on.
- Three planning applications and three appeals have noted this unsustainable location – highlighted by recent rejection of F/YR21 536/O.

Proponent supports the allocation.

### Policy LP66: Residential site allocations in Newton

#### Summary of Issues

<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>
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#### Newton-in-the-Isle Parish Council - Objects

- Will impact village life.
- Newton-in-the-Isle should be categorised higher than a Small Village B alongside a selection of hamlets. In population terms, the village does not fit with this category.
- Restrictive nature of proposed settlement boundary and shortage of available sites for development will stifle the natural growth that is necessary for the long-term sustainability of the village.
- Two separate settlement boundaries goes against everything the Parish Council is doing to unite the two ends of the village.
- A number of infill plots exist on the High Road in the central section of the village and should be included within the settlement boundary.
- More flexible approach to the settlement boundary is required; Parish Council is keen to work with FDC officers to consider all options to facilitate this and explain the new hinterland policy.
- The Environment Agency's Flood Map for Planning at the eastern end of the village is not accurate and based on two conflicting data sets as it has confirmed. Suitability of individual sites should be re-considered.
- Development of site 40191 is the highest priority for the Parish Council on road safety grounds, as it is the only means by which a footway may be created along this section of the B1165. This route forms part of the circular walk around the village and also provides access to and from the village bus service for residents of the High Road.

<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>0</b>	<b>Neutral:</b>	<b>1</b>
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#### LP66.01

Historic England  
Whilst there are no designated heritage assets within the site boundary, The Shrubberies listed at grade II lies to the southeast of the site. However, given the intervening development, the impact on the heritage assets is likely to be minimal.

Policy LP67: Employment allocations in Newton							
Summary of Issues							
Total:		Support:		Object:		Neutral:	
No comments received.							
LP67.01	<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>
	No comments received.						
Policy LP68: Residential site allocations in Ring's End							
Summary of Issues							
Total:		Support:		Object:		Neutral:	
No comments received.							
LP68.01	<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>
	<p>Historic England</p> <p>Whilst there are no designated heritage assets within the site boundary the grade II listed Toll House lies immediately to the north of the site. Any development of the site has the potential to impact the heritage assets and their settings. Recommend FDC prepare an HIA and use the recommendations to inform the policy wording.</p>						
Policy LP69: Residential site allocations in Tholomas Drove							
Summary of Issues							
Total:	1	Support:	1	Object:	0	Neutral:	0
Proponents support allocation.							
LP69.01	<b>Total:</b>	<b>5</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>4</b>	<b>Neutral:</b>
	<ul style="list-style-type: none"> <li>Wisbech St Mary Parish Council Raise no objections to this site but only with the amount remaining at 10 dwellings as per the LP justification report.</li> </ul> <p>Historic England - Object</p> <ul style="list-style-type: none"> <li>Whilst there are no designated heritage assets within the site boundary the grade II listed eighteenth century Ripes House lies immediately to the north west of the site. The site, though screened by deciduous trees, would be very visible from the listed building in winter months. Any development of the site has the potential to impact the heritage asset and its setting. Recommend FDC prepare an HIA and use conclusions to inform the policy wording.</li> </ul> <p>Have concerns about development of the full extent of the site. Subject to the findings of the HIA, suggest reducing the size of the site to the land opposite the other properties along the road frontage, leaving the land to the west and in front of the listed property open.</p> <p>Other objections:</p> <ul style="list-style-type: none"> <li>Roads unable to cope with the traffic as it is.</li> <li>Own house shakes continuously because road is so damaged, people speeding; more houses mean more cars and more danger.</li> <li>This is a village not a town, people move here for the countryside.</li> <li>This is farmland and should be farmed whether for agriculture or livestock as it has been for over 100 years. Should back British farming.</li> <li>Long existing pasture surrounded by mature trees and hedgerows full of wildlife.</li> </ul>						

- Three other locations on the Guyhirn side of Tholomas Drove would be more suitable.

## Part E – Policies Map

Summary of Issues							
Total:	5	Support:	0	Object:	4	Neutral:	1
<ul style="list-style-type: none"> <li>• Cambridgeshire County Council - As Minerals and Waste Planning Authority support the depiction of the MWLPA sites and consultation areas on the Policies Map.</li> <li>• Tydd St Giles - Object to proposed settlement boundary as it is very restrictive and will prevent all but the smallest infill. Also not having settlement boundaries now has resulted in unwelcome development e.g. Kirkgate. What is proposed is too tight. All villages need some scope to grow. Need sensible, but controlled growth, ideally spanning multiple local plans.</li> <li>• Murrow - Potential building land excluded in draft map on Back Road, Murrow. Should include back gardens of Nos 1, 3 and 5.</li> <li>• Chatteris - Disagree that Wenny Meadow should be included for development - plan is against 92% of what the town wants.</li> <li>• Newton-in-the Isle - Settlement boundary and allocations should be reconsidered around the northeast part of the village which is comprehensively developed with only minor gaps giving infill opportunities and is clearly part of the built form of the village, and primarily in flood zone 1.</li> </ul>							

## Evidence Base

Sustainability Appraisal (SA)							
Summary of Issues							
Total:	6	Support:	0	Object:	0	Neutral:	6
<p>RSPB</p> <ul style="list-style-type: none"> <li>• Seek clarification and amendments to Characterisation of Fenland – 6, sections 6.2 &amp; 6.3, and Figure 8: Cumulative Effects of Proposed Sites which needs to include renewable energy site allocations LP06.01 and LP06.02.</li> </ul> <p>Environment Agency</p> <ul style="list-style-type: none"> <li>• Seek clarification and amendments in relation to Objective 5.1 – ‘Limit or reduce the vulnerability to the effects of climate change’, relating to resilience to climate change flood risk, all sources of flood risk to be considered when applying the sequential approach, and the variation in risk within Flood Zone 3 areas.</li> </ul> <p>Anglian Water Services Limited</p> <ul style="list-style-type: none"> <li>• Support objectives and welcome continued dialogue with FDC to support the process through the preparation of evidence to help deliver a sound local plan. An updated Water Cycle Study should help provide a quantitative evidence base to inform the spatial distribution and phasing of growth and the compliance of the options proposed with the sustainability hierarchy. Through the proposed Fens Reservoir, Wisbech Regeneration and Future Fens Integrated Approach will continue to collaborate to inspire broader change and transformation for socio-economic regeneration in Fenland.</li> </ul> <p>Natural England</p> <ul style="list-style-type: none"> <li>• Whilst the SA generally follows the prescribed approach, the policies are not sufficiently robust and prescriptive to guarantee delivery of significant enhancements in accessible open space and BNG.</li> </ul>							

The SA records many negative effects for the natural environment; Plan policies should embed appropriate requirements to address these, for example existing natural features, including peat soils, should be retained and enhanced to create extensive on-site multi-functional green infrastructure, connected to the wider network, to form the framework for development.

- Monitoring indicators should quantify losses and extent of any protection/enhancement of peat soils, through Plan development; NE would welcome discussion with FDC about the changes needed.

### Habitats Regulation Assessment (HRA)

#### Summary of Issues

<b>Total:</b>	<b>1</b>	<b>Support:</b>	<b>0</b>	<b>Object:</b>	<b>1</b>	<b>Neutral:</b>	<b>0</b>
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#### Natural England

- Key issue is those proposals likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.
- Consider that the designated nature sites at risk are those within 200m of a road with increased traffic, which have habitats vulnerable to nitrogen and acid.
- Although the HRA concludes there will be no adverse effect on the integrity of the Nene and Ouse Washes internationally designated nature sites through air quality, the assessment has not been evidenced through traffic modelling or predicted exceedance of the sites' critical loads and levels for Nox, NH3 and N and acid deposition.
- As a minimum this assessment should consider the sensitivity of the sites' potentially affected habitats to increases in these emissions and depositions.

### Duty to Co-operate

#### Duty to Co-operate

#### Summary of Issues

<b>Total:</b>		<b>Support:</b>		<b>Object:</b>		<b>Neutral:</b>	<b>1</b>
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East Cambridgeshire District Council highlight previous comments regarding development towards the south of the district along the Chatteris – Doddington – Wimblington – March corridor and impact on traffic flows along the A142 travelling into East Cambridgeshire, and affecting congestion at key points along the A142 in East Cambridgeshire (especially in the Witchford – Ely area, and the A142/A10 junctions).

Huntingdon District Council raised concerns about high concentration of development to the south of the district and impacts on traffic along the A141.

No evidence or statement of common ground setting out the strategic cross boundary issues. The plan is unsound.