

Part A

Title:		Position:	Principal Environmental Planner
First Name:	Chris	Organisation:	Lightsource bp
Surname:	Atkinson		

Comment Object

Despite our overall support of the plan and of the support for the majority of the sustainability strategies that the Council has included in Part A, we feel that the current wording of the Part A of the plan should take a more proactive approach in discussing the urgency of climate action needed when discussing the overarching vision of the plan. Notably, section 3 “Our Vision” describing the Council’s vision for Fenland until 2040 omits any reference to climate change despite it being listed as a strategic objective and the “vision” being inclusive of all other strategic objectives: housing & jobs, retail, infrastructure, health and heritage. The vision of Fenland does not support sustainable development in its current form. How can you ensure economic and housing growth when you omit how climate change vulnerabilities will be considered in the plan’s vision for said growth? Tackling climate change should be at the front and centre of the Vision given the urgency at both a local, national and global level and this should be reflected in the Vision for the District. As currently drafted, we object to the Vision for Fenland.

We are pleased to note that the Council have included ‘Resilience to Climate Change and Flood Risk’ within the Local Plan Objectives, however, these objectives (5.1 and 5.2) do not go far enough. There should be a third objective added which seeks to encourage the delivery of low carbon and renewable energy developments, in appropriate locations. Without this it is questionable whether the overarching objective of being resilient to climate change can be achieved. Fenland Council has a responsibility to contribute towards tackling climate change, as all other local planning authorities do, and this should be reflected through Local Plans. Indeed, paragraph 154 of the NPPF states that Local Plans ‘should provide a positive strategy from energy from these sources, that maximises the potential for suitable development’ (our emphasis). We would question whether the current objectives are meeting the aims of paragraph 154 of the NPPF and as such object to the Objectives as currently drafted.

LSbp supports the inclusion of Sustainability Objective 9 as part of the wider Local Plan’s response to climate change. However, LSbp would argue that the urgency of delivering renewable energy is more urgent than is implied in the text, particularly in the context of events in Ukraine, which has highlighted how fragile energy security is in the UK.

Sustainability Objective 6.6.1 aims to “minimise the irreversible loss of agricultural land, particularly high-grade agricultural land” which LSbp believes is necessary to ensure agricultural production within Fenland and on a larger scale, UK food security. However, it should also be recognised key threats to food security are climate change and loss in biodiversity, and therefore it is paramount these are addressed. Furthermore land used for solar projects should be considered to have dual or multi-land use. Many solar farm sites have the capacity to allow for continued farming activity.

Therefore objectives around ‘Best and Most Versatile’ (BMV) land considerations should recognise (a) that combatting climate change is necessary to maintain and improve our ability to produce food; (b) that solar schemes can co-exist with agricultural use (such as grazing and biodiversity improvements for the agricultural unit); and (c) that short-term impacts on soil are temporary and reversible.

However, we believe the Council should define what high-grade agricultural land in Fenland is, and work with government, developers, and farmers to understand the constraints and opportunities the land presents.

Furthermore, the council should acknowledge that planning guidance does not explicitly state that solar, or other forms of renewable energy, cannot be built on BMV land but rather that it should be prioritised on non-BMV land. As drafted, Objective 6.61 goes over and above national guidance, contradicting national policy commitments to net-zero and the Climate Change Act of 2008 by damaging the effectiveness of LP6. Therefore, according to NPPF 12 sections c and d, Objective 6.61 cannot be considered sound in regard to solar.

We feel these provisions to be necessary due to the recent claims made by members of the current Government suggesting commercial solar development to be incompatible with UK agriculture; and potential proposals that could categorise grade 3b land as ‘best and most versatile’. This would severely jeopardise our ability to fight climate change

Part A

and secure our energy supply as a nation. Without the rapid deployment of renewable technology, climate change impacts will continue to worsen each year constituting, in our eyes, a far greater threat to agricultural land than the deployment of solar farms. We urge the Council to be more specific in how it defines high-grade agricultural land, and to assess the land's best-use potential for long-term gains.

Solar projects do not lead to the "irreversible" loss of agricultural land, but rather aim to improve the land over the lifetime of the installation, which is generally 40 years. Section 11.23 of Fenland's local plan notes that the "development of solar farms in Fenland does not necessarily mean that the land can no longer serve as active farmland". Indeed, at LSbp we have a successful track record of delivering co-use solar farms, where animals continue to graze the land upon which the solar farm is developed. Also, Agri-photovoltaics is becoming more established around the world, where crops can be grown under solar panels. Whilst this is still to be established within the UK, there is potential for this to become more prevalent through the lifetime of the Local Plan, which is due to run through to 2040.

During our solar project's lifetime, the land is under the strict management of stringent Biodiversity and Habitat Management Plans that ensure that there is a biodiversity net gain under the principle that we must return the land to a better condition than which we found it, supporting Britain's agricultural production in the long-term future. LSbp avoids best and most versatile land wherever possible, and targets lower grade land that typically produces only meagre returns for most agricultural crops, yet provides grassland ideal for grazing. We work with landowners to incorporate dual-land use programs that keep the land used for our solar farms in agricultural production, supporting both farmer and industry needs. These should be considerations for the planning authority in achieving Sustainability Objectives 6 and 9.

Part A

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

Comment Object

Thank you for consulting the Home Builders Federation (HBF) on the Draft Fenland Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Duty to co-operate

Paragraph 33A of the Town and Country Planning Act 2004 requires plan making authorities to engage constructively, actively and on an ongoing basis as part of the preparation of the local plan in relation to strategic matters. In order to show how the Council has co-operated in the preparation of the local plan, and will co-operate in its implementation, they are required by the National Planning Policy Framework to prepare statements of common ground (SoCG) with the relevant authorities identify the key issues where co-operation is required and what has been agreed and where there is disagreement in relation to those strategic matters.

However, we could find no evidence setting out the strategic cross border issues facing Fenland nor any SoCG with neighbouring authorities. Given that the Duty to Cooperate is a legal requirement and one which if not satisfied cannot be addressed after submission this evidence should have been provided in order for interested parties to be assured that co-operation had been effective. Evidence of co-operation alongside SoCGs with relevant parties will need to be provided on submission and as such the HBF will make comments as part of the examination in public.

Conclusion

At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF. In particular we consider it necessary for the Council to identify further development sites in order to ensure that it can meet its own needs in full over an extended plan period that is consistent with national policy. As part of this process the Council will also need to revisit its Sustainability Appraisal and consider alternative strategies and sites that could deliver in excess of what is being proposed in this plan.

Finally, the Council will need to ensure prior to submitting the plan that it has sufficient evidence to support its assertion that it has met its duty to co-operate. At present the Council lacks the necessary statements of common ground that show how it has considered the strategic issues of unmet housing needs in neighbouring areas and without these the Council will find it difficult to show how the plan has been prepared in line with the relevant legislation.

I can also confirm that the HBF would like to attend participate in the public hearings in order to put forward the concerns of our members with regard to the Fenland Local Plan.

Part A

Title:		Position:	Senior Planner
First Name:	Victoria	Organisation:	Gladman
Surname:	Demetriou-Smith		

Comment Object

1 INTRODUCTION

Context

Gladman welcome the publication of the Fenland Local Plan 2021-2040 Draft Local Plan Consultation, along with the accompanying Sustainability Appraisal and Habitats Regulations Assessment, and the opportunity to comment on the documents during the public consultation period between 25th August 2022 and 19th October 2022.

Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

The National Planning Policy Framework (NPPF) sets out four tests that must be met for Local Plans to be considered sound. For a Local Plan to be sound it must be:

- Positively Prepared – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- Justified – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

This submission provides Gladman’s formal representations to the Draft Local Plan consultation and builds upon our comments made at the previous Issues and Options Consultation stage through representations submitted in November 2019.

2 LEGAL COMPLIANCE

Duty to Cooperate

The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Fenland District Council (hereafter referred to as ‘FDC’ or ‘the Council’) must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

The NPPF sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG) throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters

Part A

have been considered and what actions are required to ensure issues are proactively dealt with, such as unmet housing needs.

1 NPPF Paragraphs 25-27

The PPG is also clear that local authorities should have made a SoCG available on their website by the time they publish their draft plan, to provide communities and other stakeholders with a transparent picture of how they have collaborated².

The Draft Local Plan consultation is not accompanied by a SoCG, nor a Duty to Co-operate Statement. This is a legal requirement and cannot be satisfied post-submission.

Sustainability Appraisal

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

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

The Draft Local Plan is informed by a Sustainability Appraisal (June 2022). The SA examines the Council's preferred approach to housing delivery, and contrasts proposed policy requirements and strategies against defined reasonable alternatives to confirm that the strategy outlined represents an appropriate strategy. This includes an appraisal of reasonable site options.

2 PPG ID: 61-020-20190315

In its current form, Gladman support the methodology, but consider that it must be reviewed and amended in line with the increased, correct, housing requirement to ensure the needs of the District are met in full.

3 NATIONAL PLANNING GUIDANCE

National Planning Policy Framework

The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

The NPPF requires that plans set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

In particular, paragraph 16 of the NPPF states that Plans should:

- a) Be prepared with the objective of contributing to the achievement of sustainable development;
- b) Be prepared positively, in a way that is aspirational but deliverable;
- c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

Part A

- e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

To support the Government's continued objective of significantly boosting the supply of homes, it is important that the FDC Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs. In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs (LHN) assessment defined using the standard method. LHN sets the minimum number of homes required and this is the starting point for determining the number of homes required in any local planning authority area, unless there are circumstances to justify an alternative approach.

Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 68 sets out specific guidance that local planning authorities should consider when identifying and meeting their housing needs, with Annex 2 of the NPPF providing definitions for the terms "deliverable" and "developable".

Once a local planning authority has identified its LHN, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so, or the application of certain policies in the Framework would provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), local authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see paragraph 35).

Paragraph 22 of the NPPF details that Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years. The Draft Local Plan has no such vision for a 30-year period despite containing several significant strategic (re)allocations to existing settlements in the District.

Paragraph 22 of the NPPF also expects that local plans should look ahead over a minimum 15-year period from adoption. The Local Plan will need to be adopted at the latest by 2025 for the requisite 15-year period to be met. This is supported by FDC's LDS which schedules adoption in February 2024.

Planning Practice Guidance

The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.

SUMMARY AND CONCLUSIONS

Introduction

Gladman welcomes the opportunity to comment on the Fenland Local Plan Draft Local Plan. These representations have been drafted with reference to the revised National Planning Policy Framework (2021) and Planning Practice Guidance.

Gladman have provided comments on several the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the plan making process.

Specific Areas of Concern

Gladman's specific area of concern relates to the housing requirement outlined in the Draft Plan. The housing requirement should be calculated using the most up to date Local Housing Need figure. However, the Council have used an out-of-date figure for one year of the plan, meaning the housing requirement is lower than necessary. Based on a LHN of 556, the housing requirement for the plan period is 10,564 and this should be amended accordingly. This is a minimum requirement and Gladman consider that an uplift of 20% should be accommodated to ensure that housing

Part A

requirements are met in full.

Gladman are also concerned with the use of settlement boundaries and a restrictive development in the countryside policy. Settlement boundaries limit sustainable housing sites from coming forward and, as currently drafted, neither policy offers the flexibility for sites within the countryside to come forward in the event of the housing land supply falling below five years.

Conclusions

Gladman have highlighted areas where we feel that policy should be amended or improved as the Plan is developed further. We consider that these issues can be fully addressed by way of changes to the emerging Local Plan prior to its publication under Regulation 19 in due course.

Title: _____ **Position:** _____

First Name: Martyn **Organisation:** _____

Surname: Lancaster

Comment **Object**

I have seen the state of some of your other plans which is scary in itself!!!!

The plan seem floored in many ways with contradictions and miss information until such time as you can guarantee, better info structure and better schools hospitals. Then you do not have my support therefore I will fight any plans.

Title: _____ **Position:** _____

First Name: Stuart **Organisation:** Greater Cambridge Shared Planning

Surname: Morris

Comment **Neutral**

Thank you for consulting Cambridge City Council and South Cambridgeshire District Council. We do not consider that the Fenland draft Local Plan has any implications for Greater Cambridge, and as such will not be making any comments to this consultation.

Title: _____ **Position:** _____

First Name: John **Organisation:** _____

Surname: Tuerena

Comment **Object**

Page 5 - NPPF - 'National Planning Policy Framework (NPPF). This Local Plan does not repeat policies in the NPPF; it builds on them when necessary and ensures locally specific issues are covered.'

Development within the North Eastern area of March was reviewed and deemed unsuitable by the Secretary of State some years ago. What right do the planning committee have to ignore this final decision and introduce this as an option again now?

Part A

Title: _____ **Position:** _____

First Name: Suzanne **Organisation:** _____

Surname: Hodder

Comment **Object**

The consultation process

The consultation process is flawed. With something as important as the emerging local plan, a full consultation with a mail shot to every Fenland resident should have been carried out. I have not spoken to a single resident who was aware of the consultation. Parish Councils should have been urged to mail shot their parishioners so that everyone could have their say.

This Local Plan will shape the future of Fenland for years to come and residents should have been better informed about its consultation.

Title: _____ **Position:** _____

First Name: John **Organisation:** _____

Surname: Revell

Comment **Support**

This is a clear, thorough and comprehensive document with much detailed analysis which is often missing in national plans and policies. I hope it will be given broad support.

Title: _____ **Position:** _____

First Name: Barrie **Organisation:** _____

Surname: Luck

Comment **Neutral**

The foreword

The foreword states "The new Plan will focus on Market demand, and meeting growth targets". Given the extremely restricted settlement boundaries imposed on Tydd St Giles, I suggest that neither of those is remotely achievable.

Part A

Title:		Position:	Planning & Development Manager
First Name:	Deb	Organisation:	The Coal Authority
Surname:	Roberts		

Comment **Neutral**

Thank you for your email below regarding the Draft Fenland Local Plan Public Consultation.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

As you are aware, Fenland District Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on any stages of your Local Plan; SPDs etc.

In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.

1: Introduction

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

Comment Object

Thank you for consulting Natural England on the above in your letter dated 25 August 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England provided comments in response to the consultation on the Fenland Local Plan Issues and Options in our letter dated 21 November 2019 (297756).

General comments

We note that much of Natural England's previous advice has not been taken on board through the draft Local Plan. This has made it difficult to offer further comment other than re-iterating the advice already provided. Of particular concern is that NPPF paragraph 20 and paragraph 179 requirements, to map green infrastructure and ecological network enhancement opportunities, have not been addressed through the Plan evidence base and carried through into robust and prescriptive Plan policies. As currently drafted the Plan appears unlikely to deliver significant environmental enhancements for people and nature. Despite the districts green infrastructure (GI) deficit and the national and local drive for enhanced GI to meet people's health and wellbeing needs, to address climate resilience, improve water resources/quality and recover nature, the current Plan is unlikely to contribute significantly towards these aspirations. In our view the vision, objectives and policies in the Local Plan will deliver little in the way of benefits for local communities, people's health and wellbeing needs, nature recovery and climate change.

Fenland's most precious resource, the lowland peat, is not even referenced in the Sustainability Appraisal or the Sites Evidence Report; Plan policies provide minimal incentive to protect and enhance this important carbon store and to use this as a framework for enhancing the districts green infrastructure and ecological network, and delivery of Biodiversity Net Gain (BNG) to benefit local people and wildlife.

Anglian Water has recently announced that its new Fens Reservoir will be sited close to Chatteris. This provides a unique opportunity for the Plan to capitalise on the investment and socio-economic enhancements that this significant multi-functional infrastructure project will bring to Fenland. Our advice is that the Plan should be revised so that it is underpinned by ecological network mapping, based on the Mapping Natural Capital and Opportunities for Habitat Creation in Cambridgeshire^{1*}, to develop a framework of environmental enhancement opportunities, with a focus in and around the Fens Reservoir proposal. The reservoir project, on land north of Chatteris and east of Doddington, and the significant benefits it will bring to Fenland, has a lengthy delivery timeframe. However, the Local Plan offers Fenland the opportunity to get ahead of the game, to begin implementing complementary environmental enhancements that will contribute towards those of the Fens Reservoir, bringing early delivery of ecosystem services benefits to local communities. This could start to open up the area to investment and socio-economic opportunities. Future designation of the UNESCO Fens Biosphere may provide a further potential catalyst to Fenland's growth.

We welcome reference to key environmental strategies and tools including GI, Local Nature Recovery Strategies (LNRS) and BNG; however, the Plan generally lacks any strategic approach to the Nature Recovery Network (NRN), strategic GI network and LNRS opportunities. There is a lack of commitment through robust and prescriptive policy requirements to deliver significant environmental gains. It's concerning that the 'Environment' corporate priority is focused on waste and street cleansing - aspirations to deliver environmental enhancements, to benefit nature, the local community and people's quality of life and health and wellbeing, are not central to the Plan vision and policies. The fundamental issue appears to be the lack of ecological network and enhancement opportunity mapping to underpin the Plan, leading to weak and generic policy requirements that will deliver limited environmental improvements for the people of Fenland.

As indicated in our response to the Issues and Options consultation, relevant policies should be more cross-cutting in the way they integrate the environment, for example transport should not simply focus on roads but also identify

1: Introduction

opportunities for green corridors to benefit the local community, people's health and wellbeing, and improve air quality, benefit climate change and nature.

BNG and GI require a solid evidence base to deliver them well. Without this baseline, through ecological opportunity mapping, to inform a strategic approach, and robust prescriptive policy requirements, there is a risk that BNG and GI enhancement will not be delivered. At best the approach is likely to deliver piecemeal enhancements, with small unconnected greenspaces on development that tick a box but don't contribute to nature recovery, connectivity to address the greenspace deficits, and deprivation in access to nature.

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

* Mapping Natural Capital and Opportunities for Habitat Creation in Cambridgeshire (Natural Capital Solutions Ltd., May 2019), prepared for the Cambridgeshire Biodiversity Partnership.

Title:	Councillor	Position:	
First Name:	Ruth	Organisation:	Doddington Neighbourhood Plan Group
Surname:	Hopkins		

Comment **Neutral**

We would ask that the District Council notes that the Doddington Neighbourhood Plan Group has commenced work on producing a Neighbourhood Plan for the village. The Group expects that the Neighbourhood Plan will be progressed alongside the draft Fenland Local Plan and the Group is committed to working alongside the District Council where possible.

The Group intends to produce a Neighbourhood Plan which includes housing allocations and local green spaces and it would be in the interests of both parties (the Group and the District Council) to try to work together in this regard. In the event that the Neighbourhood Plan is adopted before the Local Plan is adopted then the Group would expect the Local Plan to include the relevant land use allocations and local green spaces within it.

1: Introduction

Title:		Position:	Principal Environmental Planner
First Name:	Chris	Organisation:	Lightsource bp
Surname:	Atkinson		

Comment **Neutral**

Lightsource bp (hereafter referred to as LSbp) is a global leader in the development and management of solar energy projects and are a 50:50 joint venture with bp with a mission to help drive the world's transition to net zero. We have spent over a decade driving solar forward, from development right through managing and operating solar projects across our wide-spread portfolio. Since 2010, the company has developed hundreds of solar projects across the world, with a total energy capacity of 5.5GW.

The UK remains a focal point of our operations, we are firmly committed to contributing to the UK's energy security portfolio by providing affordable and clean energy integral to the UK's mission to combat climate change and achieve net-zero by 2050.

As such, we have a keen interest in the development of the Fenland Local Plan (hereafter referred to as 'the Council'), in particular its policies surrounding the delivery of low carbon and renewable energy. We welcome the opportunity to respond to the draft and look forward to contributing to the delivery of a sound Local Plan.

The remainder of this letter provides an overview of LSbp comments on relevant policies which have been set out in the draft local plan document.

General Comments

LSbp is encouraged by the Council's recognition of climate change throughout the introduction of the local plan, noting climate change to be a key strategic priority for the Local Plan in line with the National Planning Policy Framework (hereafter referred to as 'the NPPF') strategic priorities stipulating that "plans should take a proactive approach to mitigating and adapting to climate change ... and support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts" (Paragraph 153). Moreover, it is reassuring to see that the Council recognises the importance in delivering renewable energy schemes to address climate change in the district through the inclusion of LP6 in Table 1: Strategic Priorities.

We would however suggest that the Climate Change Strategic Priority is expanded to include reference to the delivery of low carbon and renewable energy projects. As currently drafted, the Strategic Priority does not align with the aims of the Key Policies which are referenced in the final column of Table 1.

Conclusion

In conclusion, LSbp are pleased that the Council identify climate change as a strategic objective in the Local Plan, in addition to making it one of the sustainability objectives. However, the Council must ensure that this rhetoric is carried through into the policies once they are drafted. As such, LSbp have provided our initial thoughts and advice as to how this can be achieved.

However, there are some glaring inconsistencies within the Plan as well as deficiencies within the proposed policies, which means that as currently drafted, the Council will not achieve the aims and objectives of the plan from a climate change perspective.

Whilst on the face of it, Policy LP6 is positively worded in terms of delivering renewable energy developments and associated infrastructure such as battery storage, it is ultimately flawed when it comes to the delivery of utility scale solar development. On the one hand the policy supports the delivery of utility scale solar and states it is subject to the presumption in favour of sustainable development, but then seeks to have a blanket ban on solar farms on best and most versatile agricultural land. Given that the majority of land in the district is either grade 1, 2 or 3a according to Natural England's high-level mapping, this is entirely in conflict with the positive approach they initially set out. This is poorly judged at present and is not in accordance with Government guidance, which does not advocate a blanket ban of solar development on best and most versatile land. As such, we object to part e) of policy LP6 as currently drafted.

1: Introduction

There are also concerns about the lack of synergy between Policy LP6 and LP18 as the latter policy makes no reference to renewable energy developments being acceptable in open countryside or that they are a form of rural diversification which provide tangible benefits to rural enterprises.

LSbp believe that collaboration between industry leaders and policymakers can help deliver sound policies that the assist the Council in tackling the climate emergency. We appreciate the proactive approach by the council to specify a presumption in favour of permission for solar proposals. Moving forward, LSbp hope that the Council take our considerations into account and works with renewable energy industry leaders to ensure that policies in the Fenland Local Plan are as effective as possible.

We hope our comments are taken on board by the Council in the pre-submission version of the Local Plan.

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

Comment **Support**

Page 13, Section 1.1

We welcome reference to designated heritage assets in this paragraph.

Title:		Position:	
First Name:	Bryan	Organisation:	
Surname:	Rose		

Comment **Object**

All

Unfortunately, the plan is based on assumptions, any effective, efficient and sustainable plans have to be based on fact. Before having any idea, what could be built and where, it would first need to establish the current capacities of the utilities to each of the population sites mentioned in the plan. Every resource has a capacity and understanding that is key to sustainable growth anywhere. The report does not address this and so could never understand the impact on the environment, residence or financial stability of developing these areas. The report makes assumptions on future improvements to transport links, where FDC know full well that areas that they are quoting as possible village for development have poor quality roadways, which are only at best minimal maintain and will never have the major upgrades they require. I suggest this draft is a complete waste of tax payers' money and FDC should be lobbying government to at first produce a national strategy which addresses funding and utilities before embarking on future works of fiction.

Title:		Position:	
First Name:	Terry	Organisation:	Wisbech Town Council
Surname:	Jordan		

Comment **Support**

This matter was considered by Wisbech Town Council on Monday (17th) evening. The council has no issues to raise; it is happy with the content of the Draft Local Plan insofar as it affects Wisbech.

1: Introduction

Title: **Position:** Senior Conservation Officer

First Name: Daniel **Organisation:** RSPB

Surname: Pullan

Comment **Neutral**

p.13, para 1.5:

Add 'and environment' end of the first sentence. CPCA has significant ambition, in relation to doubling nature and its doubling nature funding.

p.13, para 1.6:

This text is already out of date and should be re-worded regarding the likely way the OxCamArc will now come forward as a Local Authority-led vehicle.

p.13, para 1.10:

In the environment, the District contains/is adjacent to two internationally important wildlife sites in the Nene and Ouse Washes Ramsar Sites. These are intrinsic sites for the environment setting of the local plan, and should be explicitly mentioned here. You go into detail of the richness of the historic setting in terms of detailing numbers of listed buildings etc.. – please extend this to the natural environmental richness of the district by including the number of SSSIs and County/Local wildlife sites.

2: Overarching Issues

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

Comment **Neutral**

Part A- Setting the Scene

2 Overarching Issues (Page 14)

The inclusion of the Middle Level Biodiversity Action Plans and Manual is noted.

It is suggested that the following should also be included in the decision making process:

- a. The Commissioners' Middle Level Strategy Refresh Report;
 - b. The Environment Agency's Future Fens- Flood Risk Management Future Fens - Flood Risk Management - Association of Drainage Authorities (ada.org.uk);
 - c. Anglian Water's Drainage and Wastewater Management Plan Drainage and wastewater management plan (anglianwater.co.uk) ;
 - d. The County Council's March Flood Investigation Reports August 2014 March flood investigation 2019 v2 (cambridgeshire.gov.uk) and December 2020 March December 2020 Flood Investigation Report (cambridgeshire.gov.uk).
-

2: Overarching Issues

Title: Councillor **Position:**
First Name: Ruth **Organisation:** Doddington Neighbourhood Plan Group
Surname: Hopkins

Comment **Object**

Paragraph 2.12 Overarching Issues: Healthy Communities

It should be noted here that access to health services within the District (including within Doddington) is often difficult to achieve and that many residents rely upon public transport to reach destinations.

Paragraph 2.12 Overarching Issues: Jobs, Education and Housing

It should be noted here that access to public transport for new and existing housing, jobs and education will be important and that new housing and jobs will need to be focussed in locations which have the best access to public transport. Without this the District will be unable to sustainably develop.

Paragraph 2.12 Overarching Issues: Transport

This consultation has coincided with an announcement from Stagecoach that it intends to discontinue bus services across Fenland. Such services to Ely and St Ives are scheduled to be scrapped from the end of October 2022. This means that Doddington's public transport option will diminish greatly which will result in employment being inaccessible to many residents. This again means that new development will need to be prioritised into locations which have access to such facilities – in Fenland this is principally the Market Towns.

Paragraph 2.12 Overarching Issues: Heritage, Place Making and Landscape

The Group considers that this bullet point should include reference to the District's Conservation Areas and Listed Buildings and confirm the statutory requirements relative to each. The suggested additional text is:

The District contains ten Conservation Areas together with a wide range of Listed Buildings which identify the heritage of the District. These assets require protection under the Planning (Listed Buildings and Conservation Areas) Act 1990.

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

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

Comment **Object**

Page 16

We welcome the reference to Heritage at Risk although in 2021 there were 13 not 14 assets on the register. Change historic assets to heritage assets, the preferred NPPF term.

Suggested Change - Amend 14 to 13. Change historic assets to heritage assets.

2: Overarching Issues

Title: Ms **Position:** Historic Environment Planning Adviser

First Name: Debbie **Organisation:** Historic England

Surname: Mack

Comment **Support**

Page 15, Figure 1

We welcome the reference to culture and heritage

Page 15, Table 1

We welcome the strategic priority in relation to Historic, built and natural environment.

2: Overarching Issues

Title:

Position:

First Name: Lynda

Organisation:

Surname: Warth

Comment **Object**

Response on behalf of the British Horse Society - Comments applicable to the whole Plan

This Plan is to deliver growth for Fenland to 2040. The new Plan will focus on meeting growth targets as well as supporting and encouraging economic growth.

The equestrian industry in Cambridgeshire (excluding the racing industry) contributes over £100 million per annum to the rural economy. There is a particularly active and vibrant equestrian community in Fenland due to the relatively cheaper cost and more availability of land compared with other parts of the county. This community supports local landowners and farmers economically in terms of providing diversification opportunities for liveryes / grazing and supports a whole network of labour intensive employment such as farriers, vets, instructors, feed suppliers, tack shops, saddlers, hay growers and merchants, paddock maintenance, etc. Nationally, the equestrian industry is the second largest rural employer with only agriculture employing more people.

No matter what discipline an owner chooses to follow with their horse, every rider needs access to safe off road paths. The Rights of Way Improvement Plan for Cambridgeshire recognises that the bridleway network is inadequate, fragmented and in need of improvement.

The recent changes to the Highway Code and the Road User Hierarchy, places horse riders and cyclists side by side in terms of vulnerability on the roads and requiring safe access. In fact, road users are required to give horses 2m width when passing them and cyclists only 1m. Drivers should now slow their speed to 10 mph when they 'see' a horse – that's approaching from in front and from behind. The danger of horses being undertaken, particularly by fast moving cyclists, is highlighted within the Highway Code with the statement that horses should never be passed on their inside.

The British Horse Society Director of Safety has stated:

'I think the risk to horse riders having cyclists pass them on the nearside and vehicles pass them on the offside is very high and is a significant safety issue.

A cyclist suddenly appearing on the nearside of the ridden horse has the very real potential, (even for a well trained horse), to cause the horse to move the other way into the path of a vehicle on the road. This arrangement should never be planned.'

The Cambridgeshire and Peterborough Local Transport Plan defines Active Travel as walking, cycling and horse riding.

There is no reference whatsoever in the Plan to carriage drivers who must also be catered for. Often carriage drivers are ex horse riders who can no longer sit astride a horse but wish to continue their contact with and enjoyment of horses. They are also those who face mobility and other challenges and have never been able to sit astride a horse.

Throughout this Plan, there is constant reference to walking and cycling provision. Given the requirements of the Highway Code, the Road User Hierarchy, the advice of the BHS Director of Safety, the Cambridgeshire ROWIP, the economic and social importance of the equestrian industry to Fenland, this should be changed to Active Travel provision and the term clearly defined to mean walking, cycling and horse riding.

This statement must be included within the preamble of the Plan to ensure that the requirement filters down through all the policies and applied at every level. It is essential that the policy of inclusive active travel is embedded within the S106 agreements to ensure that public money is spent to benefit the maximum number of users. Flaws or errors in S106 agreements are unlikely to be spotted by the public until it is too late since there is no consultation opportunity for these private, legal agreements between the Council and developers.

For avoidance of doubt, inclusive access will rarely mean significant extra cost. Cycling provision will need to be of sufficient standard to accommodate cargo bikes which require the same space as a horse, although a horse is more

2: Overarching Issues

flexible in the middle! What is essential is that the correct signage is applied. Signage should never exclude equestrians from safe access. Use of the restrictive shared pedestrian / cyclist blue sign should be avoided.

There will be very few horses in central urban areas or at rush hour periods. However, links to existing RoW often require road work and this is where it is essential that equestrians are not excluded from the safe routes. All road crossings must be available to equestrians as well – again this can be provided at minimum cost since crossings must now provide not only for cargo bikes but also recumbent and hand propelled bikes used by those with mobility challenges. These bikes require the same turning space as equestrians.

Provision of new active travel paths should be delivered as bridleways with a 3m soft surface to one side for soft surfaces users: walkers, dog walkers, runners, off road cyclists and hard top for commuter cyclists and other wheeled equipment users. (Please note that research undertaken by a Cambs RoW officer identified that wheelchair users often find well maintained, non tarmac, rural routes more enjoyable to use than tarmac roads.)

Existing grass bridleways should not be damaged by hardtop. These paths are often old, and sometimes even ancient, routes and must be protected as part of the Fenland heritage in much the same way as ancient monuments and buildings – the difference being that these paths were created by the people for the people and not by the rich and privileged within society.

Title: Senior Conservation Officer

First Name: Daniel **Organisation:** RSPB

Surname: Pullan

Comment **Neutral**

p.16, 2.12 Box:

in resilience to climate change and flood risk please add 'Impacts of Climate change on infrastructure, agriculture and natural habitats' Justification - natural habitats are just as at risk

in land use and wildlife please add the sentence 'many protected areas are in unfavourable condition'. Justification - this environmental degradation of protected areas is an important bit of context.

3: Our Vision

Title:		Position:	Head of Business Relationships
First Name:	Zoe	Organisation:	East of England Ambulance Service NHS
Surname:	May		

Comment Object

Sec 3 Our Vision, Paragraph 3.1

Insufficient recognition is given to E EAST as an essential social infrastructure provider.

Change Requested

In the text box entitled 'Our vision for Fenland' please add the words "and ambulance" after 'health' in para 5, line 2.

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

Comment Object

Introduction - Vision and Objectives

Natural England supports the Plan's objectives to create healthy communities, employment, transport and affordable housing opportunities and to help to address climate change and water resource issues. However, it is 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. Opportunities to enhance the natural environment, embedded within the Plan, could help to stimulate investment in the district and drive social and economic, in addition to delivering benefits for: health, wildlife, landscape, climate change, best and most versatile land including the important fenland peat, air quality, water quality, drainage and flood risk management.

Aspirations for a more sustainable Fenland, a protected and enhanced natural environment and open space provision, expressed at the Issues and Options stage, have been removed. The vision for Fenland's natural environment should be significantly more ambitious and strategic; protection and enhancement of local landscape and designated sites such as SSSIs, SACs, SPAs, Ramsar sites, local wildlife sites should be at the heart of the Local Plan Vision, alongside protection and enhancement of the nationally important peat soils as key to mitigating and adapting to climate change.

Natural England supports reference to the OxCam Arc and the Spatial Framework. The Arc Working Group Environmental Principles download.php (semlep.com) which were put together by stakeholders and provide a useful framework for strategic policies.

3: Our Vision

Title: Councillor **Position:**
First Name: Ruth **Organisation:** Doddington Neighbourhood Plan Group
Surname: Hopkins

Comment **Object**

The Group does not consider that the vision is achievable in the context of the draft Local Plan in particular the amount of new housing which is proposed to be delivered within village locations (including Doddington).

Fundamentally we do not consider that there is sufficient justified and objective evidence to demonstrate that Doddington can accommodate the level of growth which is suggested. For example the village primary school has no available capacity to accommodate new pupils and there is no information within the plan as to how education facilities will be provided to cater for the level of suggested growth.

The Group also considers that the level of growth proposed within Doddington is skewed when considered with other similar and higher tier settlements. The Group is not against new development within Doddington but this needs to be soundly planned with appropriate infrastructure in place to support existing and future residents.

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

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

Comment **Support**

Page 17
We welcome the reference to the historic environment within the vision.

Title: **Position:** Spatial Planning Advisor
First Name: Tess **Organisation:** Anglian Water Services Limited
Surname: Saunders

Comment **Object**

We welcome the approach taken in the vision in recognising the need for infrastructure to be delivered and planned in step with development.

However, it is disappointing that 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 District. The plan clearly states in para. 8.4 that "A changing climate is one of the greatest challenges of our time and is already impacting on our lives."

We believe the vision should articulate the collaborative approach taken in The Future Fens Integrated Adaptation Project which aims to address the impact of climate change on the holistic Fens. The challenges faced are significant and include sea-level rise, flooding and drought. The project demonstrates how collaboration between a wide range of stakeholders can change perspectives about managing water in our communities.

3: Our Vision

Title: Mr **Position:**
First Name: John **Organisation:** Maxey Grounds
Surname: Maxey

Comment **Object**
3.1 Vision

The target for housing growth need is 10525 and yet the vision says approximately 10500 new homes. I would suggest that number should not be a limit. With the intentions for improving transport links, demand may exceed this. As such surely the Vision and all policies should be drafted on the basis of “at least” number and the Vision should indicate at least 10525 new homes.

Similar changes incorporating the words at least should be introduced throughout the plan.

Title: **Position:**
First Name: Rob **Organisation:** Savills
Surname: Morgan

Comment **Support**

The overarching spatial vision for the Local Plan is intended to guide growth to 2040. We support the spatial vision which recognises the need for economic growth, including delivery of c. 18,000 new jobs to meet the needs of all communities. The focus for growth on the four market towns, including March, is also supported.

The Spatial Strategy provides further detail for meeting the vision. It notes Fenland’s national importance as a centre for industry and seeks to build on that through a minimum target of 18,000 jobs to be provided through the allocation of 215 hectares of employment land. The minimum jobs target and significant land allocation to employment uses is strongly supported. It is however noted that Policy LP3 states that 225 hectares of employment land has been allocated in the draft Local Plan.

Title: **Position:** Senior Planner
First Name: Victoria **Organisation:** Gladman
Surname: Demetriou-Smith

Comment **Object**

Though it will be discussed in greater detail at a later stage, the vision for Fenland needs to accurately reflect the up-to-date Local Housing Need. As a housing requirement of approximately 10,500 is based on an incorrect calculation, the figure needs to be amended to at least 10,564. It is also inappropriate to suggest that the housing requirement is an approximate when it is a minimum requirement.

3: Our Vision

Title: Position: Spatial Planner
First Name: Jen **Organisation:** National Highways - Operations (East)
Surname: Searle

Comment Support

National Highways welcomes the opportunity to comment on the draft Fenland Local Plan 2021 – 2040. The document provides a vision for the future of the area and sets out a number of key objectives and planning policies that will be used to help support growth across the region.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

The housing requirement for this Draft Local Plan consists of a total requirement of 10,525 dwellings from 01 April 2021 to 31 March 2040. In relation to this consultation, our principal interest is safeguarding the operation of the A47 which routes through the Plan area. National Highways has reviewed the draft Local Plan document and associated supporting evidence base documents and offer the following comments:

Local Plan - Vision and objectives

National Highways is supportive of the aims of the plan 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.

Title: Position: Senior Conservation Officer
First Name: Daniel **Organisation:** RSPB
Surname: Pullan

Comment Neutral

p.17, 3.1 Box:

first para - unclear what 'protected landscape' means in this context. There is no landscape designation in the Fens. Last para – suggest include 'lack of access to nature and recreational opportunities'. Justification – a key element in addressing some of the societal issues listed.

3: Our Vision

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

Comment **Object**

Paragraph 3.1

We note that the proposed housing growth for the District over the Plan period is 10,500 units. However we find it concerning that the figures used take into account existing planning permissions, some of which have already commenced development. The figure proposed therefore does not represent what is proposed to be achieved, but instead relies on historic permissions. It therefore reduces somewhat the opportunity for new housing development. We are able to provide evidence of the permissions which have been implemented if required.

Title:	Mr and Mrs	Position:	
First Name:	J	Organisation:	
Surname:	Mair		

Comment **Support**

The Vision in the Fenland Local Plan 2021-2040 DLP sets out in Paragraph 3.1 “The district will attract new business, jobs and investment, whilst also supporting existing businesses and encouraging them to expand, helping to boost productivity. Rural communities and the rural economy will be supported.” which is supported and aligns with paragraph 81 of National Planning Policy Framework (NPPF) 2021.

Paragraph 81 of the NPPF 2021 sets out planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

4: Our Objectives

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

Comment **Neutral**

Pages 18-19

The contents of Table 2 are noted. Any comment is included within the response to Policy LP5 or the relevant section, see below.

Title: **Position:** Head of Business Relationships
First Name: Zoe **Organisation:** East of England Ambulance Service NHS
Surname: May

Comment **Object**

Sec 4 Our Objectives, Table 2: Sustainability Objectives, paragraph 1.2

Insufficient recognition is given to EEASt as an essential social infrastructure provider.

Change Requested

In the text box under paragraph 1.2 (Table 2: Sustainability Objectives) please add the word “,ambulance”

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

Comment **Support**

Page 18

We welcome the sustainability objectives in relation to the historic environment, placemaking and landscape.

4: Our Objectives

Title:		Position:	Spatial Planning Advisor
First Name:	Tess	Organisation:	Anglian Water Services Limited
Surname:	Saunders		

Comment **Support**

The Local Plan clearly states that the overarching objectives are set to achieve the Vision for Fenland. Whilst we support the sustainability objectives that align with our purpose and strategic objectives; however, these are not clearly articulated in the Vision.

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

Anglian Water supports the objective.

We agree that multi-functional open space provides positive benefits for health and wellbeing and environmental protection. Green infrastructure led development provides significant opportunities for SuDS, rainwater harvesting and re-use and biodiversity net gain.

4.2 Create places, spaces and buildings that are attractive and well designed, contribute to a high-quality public realm and maintain and enhance diversity and local distinctiveness of townscape character

Anglian Water agrees that well designed places are imperative to ensure sustainable and resilient communities over the longer term. We would support the progression of design guidance and codes that include integrated water management with references to encourage water neutrality to assist with demand reduction and water efficient homes.

5.1 Limit or reduce vulnerability to the effects of climate change

Anglian Water recognises that climate change is one of the key challenges for us as a water company, and we have a clear ambition to address this, including through the Future Fens Integrated Adaptation Project.

We support approaches to ensure new development is sustainable and resilient to the effects of climate change over its lifetime.

The approach to the spatial distribution of development should include opportunities to reduce the capital (embedded) and operational carbon from new homes and businesses and the infrastructure required to support this growth.

5.2 Minimise and wherever possible remove the vulnerability of people, places and property to the risk of flooding from all sources

We support this objective and where policies direct development to locations where the risk from fluvial and surface water flooding is minimised, particularly through nature-based solutions, that serve to increase infiltration and attenuation where needed. We work in partnership with other agencies and stakeholders to address flooding issues, and we have developed our own guidance for sustainable drainage systems, which can be found here.

6.3 Minimise and avoid where possible impacts to biodiversity and geodiversity, both within and beyond designated sites of international, national or local significance, and on protected species

We support this objective.

Anglian Water recognises the importance and challenge of environmental protection and many of our own sites are designated due to their wildlife significance.

Anglian Water's £800million Water Industry National Environment Programme (WINEP) between 2020 and 2025 is larger than that of any other water company, and focusses on measures including removing chemicals such as

4: Our Objectives

phosphates and ammonia from used water and working with organisations like The Rivers Trusts on river restoration projects to protect some of the region's unique chalk stream habitats.

Further information on WINEP projects in Fenland can be found on our interactive map which shows our latest investment schemes to improve the environment, 2021 storm overflow data (also known as Combined Sewer Overflows) and the river network.

7.1 Minimise water consumption and encourage re-use

We are strongly in favour of this objective as it is fundamental to our purpose and strategic ambitions. Our Water Resource Management Plan (WRMP19) identifies that demand reduction measures are important to help maintain future supplies through pressures of climate change impacts and population growth, whilst ensuring environmental protection. Although strategic infrastructure such as the Strategic Pipeline Alliance and the proposed two new reservoirs will ensure sufficient water supply in water stressed areas, this needs to be reinforced by managing water resources more efficiently.

7.2 Avoid deterioration and seek opportunities to enhance water quality in rivers and other water bodies

We support this objective.

Anglian Water is actively working and collaborating with different sectors to create effective and workable plans for rivers to achieve significant improvement in ecological quality across our catchments; such as through our Get River Positive plan to accelerate efforts to protect and enhance our rivers in partnership with Severn Trent.

The Future Fens: Integrated Adaptation Project also seeks to improve water quality by developing nature-based solutions through collaborative working at a landscape scale.

9.1 Reduce energy consumption and increase the use of renewable and low carbon energy sources

We support this objective. Anglian Water has a strategic ambition to be a net zero business by 2030. Part of our net zero routemap is to develop renewable and low carbon energy on our estate to support our ambition to become net zero. We welcome the positive ambitions of this Local Plan to incentivise the delivery of renewable energy within the district and would encourage the plan to incorporate our recommendations in this regard.

Title:		Position:	Sustainable Places Planning Adviser - Ea
First Name:	Andrew	Organisation:	Environment Agency
Surname:	Thornton		

Comment **Neutral**
Sustainability Objectives

While we strongly encourage the inclusion of Climate Change and recognize the significance of flood risk as part of the impacts of a changing climate, we suggest that flood risk is given its own priority. This would reflect the local environment, as there are large areas at risk from flooding in the Fenland area.

The majority of the Fenland area already benefits from the presence of flood defences. It is not possible to remove the risk of flooding entirely; there will always be a residual risk associated. We would therefore suggest the following wording: Minimise and wherever possible reduce the risk of flooding from all sources to all vulnerabilities of people, places, and property.

4: Our Objectives

Title: Mr **Position:**
First Name: Steven **Organisation:** Foster Property Developments
Surname: Foster

Comment **Object**

REPRESENTATIONS TO SUSTAINABILITY APPRAISAL OF DRAFT FENLAND LOCAL PLAN
OBJECT

Introduction

These representations to the Sustainability Appraisal for draft FLP are focused on the following matters: the assessment of Policy LP2 and the failure to identify or assess a reasonable alternative housing requirement that would meet a higher proportion of affordable housing needs; and the assessment of the three sites promoted by Foster Property Developments at Wisbech (Ref. 40255), March (Ref. 40257) and Leverington (Ref. 40256) to highlight where scores should be corrected. The representations to draft FLP make similar comments.

Policy LP2 – Reasonable Alternative Options

A key aim of the Sustainability Appraisal (SA) process is to make a plan more sustainable. It tests the social, economic and environmental impacts of various plan options, to help choose the most sustainable options; and helps to fine-tune the preferred options. It also seeks to determine the extent to which the principles of sustainable development are integrated into the plan and its policies. The regulations for SAs are contained in the SEA Directive (2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004. Paragraph 14 of the SEA Directive and Regulation 12(2)(b) of the SEA Regulations 2004 requires an assessment of the significant effects of reasonable alternatives. Therefore, the SA for emerging FLP must identify and assess reasonable alternatives, and then explain why those alternatives have been selected or rejected.

It is considered that the SA for draft FLP should have identified and assessed a housing requirement that seeks to meet a higher proportion of the affordable housing needs. The representations to Policy LP2 explained why an upward adjustment should be made to the housing requirement, which is related to the identified affordable housing needs and that those needs would not be met by the proposed housing target (derived from a minimum standard method figure) and proposed allocations. An upward adjustment to the housing requirement in Policy LP 2 to meet a higher proportion of affordable housing needs represents a reasonable alternative option that should have been assessed in the SA for draft FLP.

It is requested that the Reg.19 version of the SA for draft FLP identifies and assesses a housing requirement that seeks to meet a greater proportion of the affordable housing needs, which represents a reasonable alternative option.

Sustainability Appraisal – Appendix C

Appendix B of the SA assesses the proposed site allocations and reasonable alternative sites against the identified sustainability objectives. Appendix C provides the detailed commentary and scores for each site. These representations are focussed on the assessments in Appendix C of the three sites promoted by Foster Property Developments at Wisbech (Ref. 40255), March (Ref. 40257) and Leverington (Ref. 40256). It is considered that some of the commentary and scores contained in the assessment of these sites are not robust and should be corrected. The requested changes to the commentary and scores are set out below.

Land off Kinderley Road in Wisbech (Ref. 40255)

Objective 3.1: The proposed site access for the promoted development would be through the existing parking area serving Nos. 73-99 Kinderley Road. Foster Property Developments has an agreement with the owners of this property that allows for an access to be created and for the existing parking area to be re-provided within the promoted development. It is requested that the comments in the assessment about the site access arrangements are amended, since a safe and suitable access to serve the promoted development can be provided.

4: Our Objectives

Objective 3.2: A public footpath exists along the north western edge of the promoted site, providing a route from Waterlees Road to Tindall Court, but it does not appear to be well used. The route of the public footpath could be retained and incorporated into the promoted development at the site. It is requested that the comments about there being no PROW in the vicinity of the site are corrected.

Objectives 4.2 and 4.3: The site is located immediately adjacent the settlement boundary for Wisbech. There is an established residential area to the south of the site. Waterlees Road provides the eastern and northern boundary of the site. There are mature trees and hedges along the site boundary with Waterlees Road. There are no views of the site from the west at Osborne Road because there are trees and hedges at the field boundaries. There is a long-distance view of the site from the north at First Marsh Road, but that view shows vegetation and some buildings at the edge of the settlement. The promoted development would seek to retain the existing vegetation at the site boundary and include additional landscaping within and on the edge of the site. The promoted development would not be detrimental to local character and would protect and enhance landscape character. It is requested that the comments about impact on local character are deleted from the site assessment, and the score for these objectives should be amended from 'significant negative' to 'positive'.

Objectives 5.1 and 5.2: The site is located within Flood Zone 3 but it benefits from flood defences. As demonstrated by planning permissions and other proposed allocations that it is possible to successfully mitigate the impacts of flood risk in this location, through a detailed assessment and planning conditions. The finished floor levels for the promoted development could be raised to avoid flood risk impacts. It is requested that the commentary on flood risk is amended to include references to flood defences at the site and the potential for mitigation measures to be provided at the promoted development to address flood risk.

Objective 8.2: It is claimed that the site is potentially located on contaminated land. The site is agricultural land and is not contaminated. There is no information provided about the potential source of the contamination, and it appears that there is an error in the commentary. It is requested that the comments about contaminated land at the site are deleted, and that the score for this objective should be amended from 'significant negative' to 'neutral'.

Land off Wimblington Road in March (Ref. 40257)

Objectives 4.2 and 4.3: It is concluded in the assessment that development at the site would lead to significant adverse harm to local character. These findings are inconsistent with the assessment of neighbouring sites, and do not take into account other proposed allocations in this location or the policy requirements for landscaping to be provided. There are numerous proposed allocations for residential and employment uses in draft FLP located in the southern part of March and to the west of Wimblington Road – see for example residential allocation Refs. LP39.03, LP39.04, LP39.07 and LP39.10, and employment allocation Refs. LP40.02 and LP40.03. The adjacent proposed allocations off Wimblington Road include policy requirements relating to the retention of existing trees and hedges and for additional landscaping to address visual impacts. The promoted development by Foster Property Developments would seek to retain the existing vegetation at the site boundary and include additional landscaping within and on the edge of the site. It would be an inconsistent outcome for the potential impacts on local character from development at neighbouring sites to be considered acceptable with mitigation measures, but to take a different approach for the land promoted by Foster Property Developments. The promoted development would not be detrimental to local character. It is requested that the comments about impact on local character are deleted from the site assessment, and the score for these objectives should be amended from 'significant negative' to 'positive'.

Objectives 5.1 and 5.2: The site is only partly located within Flood Zone 3 but benefits from flood defences and is not at risk of flooding. The decision to grant planning permission and allocate sites in March on land partly within Flood Zones 2 and 3 demonstrates that it is possible to successfully mitigate the impacts of flood risk in this location, through a detailed assessment and planning conditions. The finished floor levels for the promoted development could be raised to avoid flood risk impacts. It is requested that the commentary on flood risk is amended to include references to flood defences at the site and the potential for mitigation measures to be provided at the promoted development to address flood risk.

It is considered that allocating this land will provide the opportunity for a larger more sustainable development to be

4: Our Objectives

provided when added to neighbouring land already allocated and as envisaged in the existing Local Plan. The land currently forms part of the 'South-west March broad location for growth' in the adopted Local Plan. This broad location is identified as being suitable for "predominantly residential (around 500 dwellings), but also include some business development, probably in the southern part on the west side of the B1101".

It is noted that the assessment identified a number of positive outcomes related to the accessibility of the site. It is considered that with the requested amendments to the local character and flooding objectives this site should be allocated in draft FLP.

Land rear of Glendon Gardens in Leverington (Ref. 40256)

Objective 4.1: The assessment refers to the potential impact on scheduled monuments and listed buildings. The site is not within the setting of any listed buildings, and it is requested that this comment is deleted from the site assessment. As set out in the in the call for sites submission, the promoted development includes a buffer with the Roman Bank Scheduled Ancient Monument on the western boundary of the site. The buffer would separate built development from this heritage asset and protect its setting. The design and layout of the promoted development would effectively mitigate the impact of development on this heritage asset, and this should have been taken into account in the assessment. It is requested that the score for the historic environment objectives should be amended from 'negative' to 'neutral'. The representations to Policy LP56 and the Preliminary Heritage Report that accompanies those representations provide more detail on the impact of the promoted development on Roman Bank Scheduled Ancient Monument.

Objectives 4.2 and 4.3: The site is located immediately adjacent the settlement boundary for Wisbech. There is an established residential area to the east of the site. The western boundary is defined by a belt of trees that run along an historic sea defence (Roman Bank Scheduled Ancient Monument). The site is open to the wider countryside on its northern boundary. The promoted development would include additional landscaping within the site and at the northern boundary to address landscape and visual impacts. The other proposed allocations in Leverington and on the western edge of Wisbech include policy requirements for the retention of existing vegetation and additional landscaping at sensitive site boundaries – see for example Allocation Refs. LP56.01, LP56.02 and LP36.08. A similar approach could be applied for the promoted development. The promoted development would not be detrimental to local character and would protect and enhance landscape character. It is requested that the comments about impact on local character are deleted from the site assessment, and the score for these objectives should be amended from 'significant negative' to 'positive'.

Objectives 5.1 and 5.2: The site is partly located within Flood Zone 3 but benefits from flood defences and is not at risk of flooding. It is noted that planning permission has been granted for other developments in Leverington and Wisbech that were also located within Flood Zone 3. It is noted that there is a housing commitment (in Wisbech) in close proximity of the site, at land to the east of Sutton Road, which has a similar proportion of land within Flood Zone 3 and has been granted planning permission subject to flood mitigation measures (see Allocation Ref. LP36.08). The decision to grant planning permission and allocate sites partly within Flood Zone 3 demonstrates that it is possible to successfully mitigate the impacts of flood risk in this location. The finished floor levels for the promoted development could be raised to avoid flood risk impacts. It is requested that the commentary on flood risk is amended to include references to flood defences at the site and the potential for mitigation measures to be provided at the promoted development to address flood risk.

4: Our Objectives

Title: Mr **Position:**
First Name: Steven **Organisation:** Foster Property Developments
Surname: Foster

Comment **Object**

Sustainability Objectives

OBJECT
The Sustainability Objectives of draft Fenland Local Plan (draft FLP) are generally supported and are consistent with national policy contained in the National Planning Policy Framework (NPPF).

Sustainability Objective 3 (Transport) seeks to encourage the use of sustainable modes of transport, which is consistent with national policy and is supported. The main opportunities to increase the use of sustainable modes of transport is at the four market towns in Fenland, which have a good range of services and facilities and are served by public transport. As set out in the representations to Part D of draft FLP, it is requested that additional allocations are made at the market towns, including in March and Wisbech, in order to direct development to locations where travel by sustainable modes of transport is a more realistic option.

Sustainability Objective 2 (Jobs, Education and Housing) seeks to provide affordable housing to meet needs in appropriate locations. It is noted that the delivery of affordable housing to meet identified needs is a strategic priority (see Table 1 at pg. 15 of draft FLP), and that an insufficient supply of affordable housing is identified as an overarching issue (see Overarching Issues at pg.16 of draft FLP). In these circumstances it is entirely appropriate that affordable housing is included within the Sustainable Objectives. However, if affordable housing is identified as a strategic priority, overarching issue and sustainable objection, then it is considered that draft FLP should seek to address those affordable housing needs through effective policies. As set out in the representations to Policy LP2, the proposed housing requirement in draft FLP does not include any upward adjustments to ensure that affordable housing needs are met during the plan period, which is an approach that is inconsistent with national policy. If the housing related Sustainability Objective 2.3 is to be achieved, then it would be necessary to meet identified housing needs in full, include an upward adjustment to meet affordable housing needs, and to allocate sites to meet that need in suitable locations where there are no constraints or where there are constraints they can be addressed through mitigation measures.

Requested Change

No changes are requested to Sustainable Objective 2, but this objective would only be achieved by upward adjustments to the housing requirement in Policy LP2 to address affordable housing needs.

No changes are requested to Sustainable Objective 3, but this objective would only be achieved additional allocations at the market towns, including March and Wiisbech, where travel by sustainable modes of transport is a more realistic option.

Title: **Position:** Senior Conservation Officer
First Name: Daniel **Organisation:** RSPB
Surname: Pullan

Comment **Neutral**

Table 2 – Sustainability Objectives:

New 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.

4: Our Objectives

Title: Mr **Position:**

First Name: Martin **Organisation:** Wildlife Trust for Bedfordshire, Cambrid

Surname: Baker

Comment **Support**
The Wildlife Trust supports the inclusion of objectives 1.3, 6.3. 6.4, 7.1, 7.2, 8.1 & 9.1

Title: **Position:**

First Name: Stephen **Organisation:**

Surname: Hodson

Comment **Object**
Sustainability Appraisal Scoping Report : October 2019

Fenland is ranked 80th most deprived authority out of 319 .Wisbech and North Fenland are worst areas Figures 13 on page 22 and figure 14 on page 23 show Fenland are "Statistically significantly worse than the England (And Cambridgeshire) average.

The new Local Plan does not appear to address these problems

In both table Figures 13 and 14 Fenland residents has the highest " Long term activity limiting illness " and the lowest " Reporting good or very good health " throughout Cambridgeshire .How does the new Local Plan address the terrible situation
