

Part B - The Spatial Strategy

Title:	Mr	Position:	
First Name:	Richard	Organisation:	East Cambridgeshire District Council
Surname:	Kay		
Comment	Neutral		

Thank you for consulting East Cambridgeshire District Council (ECDC) on your Draft Local Plan – August 2022.

Whilst we commend you on the general layout and presentation of the Plan and supporting material, this response focusses on potential impacts on East Cambridgeshire of the proposals within the Plan.

It is noted that the Local Plan identifies a housing requirement over the plan period, derived from the national standard method for calculating need. We welcome your Council's commitment to accommodate its housing need in full (para 5.6). For the avoidance of doubt, East Cambridgeshire District Council is not seeking to accommodate any unmet housing need from Fenland (should any such unmet need arise), nor 'offload' any need arising in East Cambridgeshire to Fenland.

As it was highlighted in our previous response, an element of your Plan of particular interest to ECDC is in respect of the quantum of development proposed along the broad Chatteris – Doddington – Wimblington – March corridor (especially any additional growth beyond what you have already committed to via existing permissions and allocations in your current Local Plan).

For example, we have estimated that around 50% of the total housing growth in the district would be along this corridor, amounting to somewhere in the region of 5,000 new homes, 2021-2040, though it is accepted that a significant amount of this is likely to be already 'committed' via permissions or allocations in the currently adopted Local Plan (and March Neighbourhood Plan). Nevertheless, our interest in this regard is the degree of impact of this growth 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).

In considering above, we have read the supporting document Transport Study (PE-14 – Transport Study – July 2022). This appears to be an interim report, with a full study to be linked to the next stage of the Plan. Nevertheless, that interim report has helpfully indicated that around 400-550 more vehicles per hour, in each direction, will pass into/out of East Cambridgeshire, at peak times along the A142 (see section 4.5). Put more simply, that's around 8 more vehicles a minute, in both directions, which is a significant increase on an already busy road.

The interim report makes no preliminary analysis, as far as we can see, of the consequences of this on 'pinch points' along the A142 within East Cambridgeshire. We would therefore expect your final transport study to undertake such an assessment, in the same way as it is doing so for pinch points within Fenland (i.e. section 4.4 of your report). We are happy to discuss with you which such East Cambridgeshire pinch points will be (or could be) subject to impact arising from the additional traffic flow from Fenland to East Cambridgeshire as a result of proposals in your plan.

As a matter of detail, we would also like to explore the conclusion of table 4-4, which seems to suggest that the level of additional traffic flow along the A142 to/from East Cambridgeshire is similar in volume each way, at both morning and evening peak. This does not appear to reflect anecdotal evidence (as well as your evidence in tables 4-5 and 4-6) that there are typically stronger flows south on the A142 in the morning (from Fenland towards employment hotspots of Cambridge / S Cambs), and north on the A142 in the evening. We are not necessarily disputing your forecasting in this regard, but would like reassurance that the modelling appears robust to reach the conclusion you have. For example, why is the modelling suggesting there will be, more or less, as much additional in-commuting to Fenland from East Cambs along the A142 in the morning, as there is out-commuting?

Overall, before you proceed to your final draft plan, ECDC recommends that further discussions are undertaken between the two councils to fully explore and understand the impacts of proposed growth in Fenland on the highway network of East Cambridgeshire.

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Aside from the highway issue above, we are not aware of any other strategic matter which affects East Cambridgeshire arising from your emerging Plan.

Thank you for consulting us on this version of the Local Plan. We would like to be kept informed of the Local Plan progress.

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

Comment **Neutral**

Spatial Strategy

Given National Highways role and interest in the Strategic Road Network (SRN), we are particularly interested in the spatial elements which are most likely to impact on the A47. While it is not included in National Highways plans for improvements between 2020 and 2025, we have agreed to fund an assessment of the A47 between the A16 and the Walton Highway east of Wisbech. Fenland is not linked to the wider national highway network by dual carriageway.

Title:		Position:	
First Name:	Anthony	Organisation:	
Surname:	Gowing		

Comment **Neutral**

I am bemused that housing development can be approved with no mention of intention of increasing the provision of Doctors Surgeries. I refer to the Fenland 2016 Infrastructure Survey.

4.81 In addition to this, there will need to be the expansion and development of new or existing GP surgeries, dentists and pharmacies. These will be required in line with population growth and are partly to be delivered as part of master planning of strategic urban extensions."

I also notice Fenland Council decided not to charge developers an Infrastructure levy so presumably there are no funds for this anyway. I think it is a bit remiss not to detail what is going to be done about an increase in population locally and what is to be done to accommodate it in terms of NHS Provision.

5: Local Plan Growth Strategy

Title:		Position:	Development Planner
First Name:	Katie	Organisation:	Persimmon East Midlands
Surname:	Dowling		

Comment	Object
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It has been projected 3,638 units will be built within 5 years, and a requirement (including a 5% buffer) of 2,878. with a 5 year housing supply of 6.34 which is stated within the 5 Year Housing Land Supply 1st April 2021 to 31st March 2026 Draft Local Plan (August 2022) Version document. However, based on our knowledge of the area we have gone through the documentation, and we are questioning 192 units within the 5 year supply that could be potentially reduced from the projection, this would bring the total projection number of units in the 5 year supply down to 3,446; and based on the 5 year housing land supply calculation (below) we believe their 5 year housing land supply would be reduced down to 5.9 years, not the 6.34 years of which they are stating.

We are not arguing that Fenland does not have a 5 year housing land supply, we are arguing that the 5 year supply stated is not as strong as first thought and could be argued down through thorough examination of the projections set out in the 5 year housing land document.

$$3,446 \text{ (Our Projection)} / 2,878 \text{ (Requirement)} = 1.197$$
$$1.197 * (x) 5 = 5.9$$

5: Local Plan Growth Strategy

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

Comment Object

The Local Plan housing target is for 10,525 dwellings to 2040. The spatial strategies for housing and employment development are focused on the market towns of Chatteris, March, Whittlesey and Wisbech with their good access to employment, retail, education, transport, leisure and community facilities. Natural England is pleased that this appears to target growth in the most sustainable locations and likely to have least impact on the natural environment; however, we are concerned that insufficient consideration has been given to avoiding loss of the precious peat resource.

We note that a Viability Assessment found that Fenland has lower house prices and land values than other authorities in the wider Cambridge sub-region and has relatively low development viability, particularly in locations in the north of the district. Natural England believes that embedding high quality multi-functional GI into housing development makes sound economic sense and can significantly improve housing viability. GI provides multiple benefits, including improved public health, better air quality and sustainable drainage, provide good value for money. Places with high-quality green infrastructure attract investment, skilled workers, tourists, and economic activity.

We believe that the Plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. As previously advised the Plan should be underpinned by a map of the existing ecological network and opportunities to deliver strategic / landscape-scale enhancements. Existing information is available to inform this including Mapping Natural Capital and Opportunities for Habitat Creation in Cambridgeshire (Natural Capital Solutions Ltd., May 2019) prepared for the Cambridgeshire Biodiversity Partnership, and other sources referenced in our previous response.

Fenland opportunity mapping should be used to develop a strategy to inform the appropriate location of site allocations and to identify opportunities for delivery of biodiversity and green infrastructure enhancement projects, including off-site BNG, through the Plan’s major development and biodiversity and green infrastructure policies. This could then be used to prepare a Fenland Green Infrastructure Strategy / SPD or an update to the Cambridgeshire Green Infrastructure Strategy.

The Local Plan should be underpinned by up-to-date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Natural England suggests that cross-cutting issues should be identified at this early stage. For example, transport infrastructure, water and sewerage, air quality, flood protection and recreation and leisure requirements can have potential implications for the natural environment and policies to deliver these requirements will need to ensure its protection and enhancement. Key issues for Fenland’s natural environment include the loss and degradation of peat soils and the need for accessible open space to meet people’s recreational needs and reduce pressure on more sensitive designated sites; useful reference could be made to the findings of the East Anglian Fens Peat Pilot Study when they emerge.

The plan should recognise that social and economic benefits can be delivered through environmental gains, in addition to enhancing biodiversity. Natural England has a significant evidence base for this, including the Microeconomic Evidence for the Benefits of Investment in the Environment 2 (MEBIE2).

5: Local Plan Growth Strategy

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

Comment **Neutral**

The Group notes that a 3% buffer has been applied to the housing figure in Policy LP2 – the earlier text suggests a 10% buffer (draft Local Plan paragraph 7.5) albeit paragraph 5.11 identifies that a 5% buffer may be appropriate. This should be clarified.

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

Comment **Object**

The housing requirement for this Draft Local Plan consists of 517 dwellings for the period 01 April 2021 to 31 March to 2022 (1 year) plus 556 dwellings in each year from 01 April 2022 to 31 March 2040 (18 years) thereby providing a total requirement of 10,525 dwellings from 01 April 2021 to 31 March 2040.

The use of a different Local Housing Need (LHN) for one year of the plan is inappropriate. The most up to date LHN figure is the figure that should be used at all stages of the plan, up to submission. Therefore, in this iteration of the Local Plan, the LHN of 556 should be used for the whole plan period which totals a housing requirement of 10,564. Should the LHN figure change pre-submission, the total should be recalculated accordingly.

It is also noted that this housing requirement is a minimum and should be worded as such. The over allocation of housing land should be considered so that the Local Plan provides a flexible and responsive supply of housing land to allow for any changes in market conditions associated with housing delivery and will ensure that the minimum housing needs identified are met in full.

Furthermore, in order for the housing needs for the whole plan period to be met, it will be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation’s recommendation that local plans should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.

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Title:		Position:	
First Name:	John	Organisation:	
Surname:	Tuerena		
Comment	Object		
Para 5.4			
'The housing requirement for this Draft Local Plan therefore consists of 517 dwellings for the period 01 April 2021 to 31 March to 2022 (1 year) plus 556 dwellings in each year from 01 April 2022 to 31 March 2040 (18 years) thereby providing a total requirement of 10,525 dwellings from 01 April 2021 to 31 March 2040.'			
Since leaving the EU the population of the UK has remained unchanged, with immigration levelling off with no increase in the overall numbers applying for entry. Likewise many EU workers returned home leaving massive gaps in the jobs market. There are more jobs available than workers to fill them, this is a fact. Plus there is a massive increase in the housing market whereby landlords are selling up and moving on. So why do we need this entire house building anyway?			

Title:	Ms	Position:	Chartered Town Planner
First Name:	Shanna	Organisation:	Swann Edwards Architecture Limited
Surname:	Jackson		
Comment	Object		
It would be helpful if the figure for the 5 year housing land supply was up to date and did not refer to a figure which is over a year old.			

Title:	Mr and Mrs	Position:	
First Name:	J	Organisation:	
Surname:	Mair		
Comment	Support		
We support paragraph 5.13 that Fenland’s economy is diverse and of national importance, as a centre for agriculture, food processing industries, manufacturing, logistics and storage, engineering, public administration and other industries. We also support paragraph 7.11 that the Local Plan should take a flexible and facilitative approach to economic growth by allocating significantly more employment land. Policy LP15: Employment sets out Fenland’s ambition is to attract new businesses, jobs and opportunities whilst supporting growth of existing businesses and is supported.			

6: The Settlement Hierarchy and the Countryside

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

Comment **Object**
6.13: The term ‘settlement hinterland’ is very much open to interpretation and could be used out of context and perhaps applied multiple times also.
6.14: If the policy is not suitable for all villages then this requires further explanation as to why – the Council could also list the villages where the policy would not apply.

These paragraphs are not sound as they are not sufficiently justified and would appear to not be effective either.

Title: **Position:** Senior Conservation Officer
First Name: Daniel **Organisation:** RSPB
Surname: Pullan
Comment **Neutral**
p.22, para 6.2:
Although linear settlement patterns are an historical legacy of many Fens settlements, we would question whether reinforcing this settlement pattern in new development is in line with the council’s goals, particularly regarding transport sustainability and creating cohesive communities.

Title: Mr **Position:**
First Name: Chris **Organisation:**
Surname: Hodder
Comment **Object**
Paragraph 6.13
I object to the council welcoming prestige or executive homes in particular, properties in bands G and H. This is a blatant attempt to increase revenue from council tax and government revenue through stamp duty. Where is the concern for the environment when actively promoting these oversized properties? Tydd St Giles has seen dozens of these homes built over the last two decades, often 5 or 6 bedroom homes with just 2-4 occupants.
It states that frontage infill developments will be for up to 3 homes, will there be a limit to the number of ‘frontage infill’ developments granted on a particular road? Or will it result in multiple frontage infill to the point where the gap between the settlement boundary and the furthest property deemed part of the settlement becomes non existent? These new terms and policies put the open countryside at serious risk and I do hope the planning inspectorate question these changes.

6: The Settlement Hierarchy and the Countryside

Title:	Mrs	Position:	
First Name:	Suzanne	Organisation:	
Surname:	Hodder		
Comment	Object		
I object to the following: ‘The provision of prestige or executive homes would also be particularly welcomed (defined as houses falling within council tax bands G and H)’. (para 6.13)			
The intention of this wording could not be more obvious, it is quite clearly to generate a greater revenue for the council through council tax on these prestige homes and greater revenue through stamp duty for the government with zero concern for the environment. Encouraging builders to create oversized homes very often with 5 and 6 bedrooms for a family of 3 or 4. Take Tydd St Giles for example where ‘executive homes’ have become the norm in a village of cottages, bungalows and semi-detached homes. The executive homes look out of place, often on small plots in proportion to their size. This type of development does not respect the countryside, and it does not help the environment. Combine this with the new terminology in LP1, ‘frontage infill development’ and ‘settlement hinterland’ and the distinctive character of the Fenland landscape will be lost forever.			

Title:	Ms	Position:	Chartered Town Planner
First Name:	Shanna	Organisation:	Swann Edwards Architecture Limited
Surname:	Jackson		
Comment	Neutral		
The settlement hierarchy places the position of villages according to their size and range of facilities. We note that Coates has been classed as a ‘Medium Village’ which is suggestive of it having a smaller offering in terms of scale and facilities and yet it has been allocated much more housing and employment land than a ‘Large Village’ such as Manea. This throws into question the proposed methodology for establishing the hierarchy set out in paragraph 6.5.			

Title:	Mr	Position:	
First Name:	Mark	Organisation:	
Surname:	Hemment		
Comment	Support		
Paragraph 6.10:			
Fully support the reintroduction of defined settlement boundaries, to increase certainty of where developments can go.			

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Title:

Position:

First Name: Geoff

Organisation:

Surname: Newham

Comment

Object

In summary, the Draft Development Plan:

- Is contradictory and lacks certainty, definitive instruction and direction
- Opens the doors to rampant exploitation
- Will destroy the Fenland landscape and small village settlement patterns
- Does not conform to the NPPF
- Refers to and uses out-of-date information
- Perpetuates poor planning controls leading to over development
- Promotes an adversarial approach to applications
- Creates discord and divisiveness which promotes poor community health
- Does not address the poorly maintained infrastructure
- Increases the amount of commuter traffic

1. Fenland District Council's Draft Local Plan for Consultation provides confusion and misunderstanding and will lead to severe exploitation and rampant development in the countryside.

2. In the Draft Plan, LP1 Part B stipulates that building in the countryside, outside the established development footprint, will be tightly controlled and restricted to allow refusal of permission to build residential developments outside the village settlement boundary because it's contrary to the vision, objectives and policies of this Draft Plan.

3. But then, Part C of LP1 sweeps away all these controls and restrictions with its newly coined phrase, 'Frontage Infill Development'. This is repeated at paras 17.1 and 17.5. And, there's another newly coined term, the 'Settlement Hinterland'. This is described as being anywhere within what might be creatively interpreted to mean the village boundary. This will open the floodgates for a barrage of planning applications with no defence. What greenery, openness and countryside there is left in Tydd St Giles will be consigned to the scrapheap. Part B and Part C directly contradict one another and makes them unworkable.

4. Tydd St Giles will become a magnet for every would-be and has-been developer to bring in linear developments and destroy the unique settlement that is Tydd St Giles. This nullifies all the declared visions, objectives and ambitions which pepper the Draft Plan from start to finish, such as 'Retain the distinctive character of Fenland's landscape... preserve settlement patterns... Minimise the irreversible loss of undeveloped land... unique and protected landscape...'

5. There is nothing within the National Planning and Policy Framework (NPPF) that gives rise to Frontage Infill Development or a Settlement Hinterland?

6. Sections 5 and 6 of the Draft Plan, The Spatial Strategy, provides a plan to meet the housing need across the region administered by Fenland District Council. It would appear that FDC will face the impossible task of reconciling the re-introduction of settlement boundaries with the simultaneous dismissal of those same boundaries. Applications will be flouting one policy while at the same time conforming to another. This will give the decision maker a bit of a headache so s/he may well end up abandoning the Plan-Led approach to decision making advocated in the new Draft Plan.

7. In paragraph 26.14, the Draft Plan states, 'As a small village, Tydd St Giles provides opportunities for new housing development.' One can only presume this is where the frontage infill development and the new settlement hinterland come into play – to encourage and allow even more applications to come forward, gobbling up yet more green spaces and openness. But there is no room left within the settlement boundary; Tydd St Giles has already reached saturation point. Over-development is now a sadly obvious regret. The village has already grossly exceeded its expectations for growth in recent years; one could argue this growth has become indecent.

8. In LP63, Tydd St Giles is shown as being allocated 7 houses which are, indeed, being built as I write. Far from being 'allocated for development', they are well on the way to being completed following a variation to the original

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permission granted more than a decade ago. But there's no mention of all the other recently successful applications; 12 on Sapphire Close, another 12 more being built and crammed in along Kirkgate, 4 more on the Old Stable Gardens and a host of other ad hoc projects dotted in and around the village. And, worryingly, para 26.14 has not been expanded sufficiently to give any meaning to the words. But, again, one is drawn back to LP1, Part C. Herein lies the future. And it's bleak.

9. Rather conveniently, this plan seems to by-pass the over-development that's already taken place in Tydd St Giles. Only quoting one of the development projects presents an inaccurate summary of the excessive growth that's taken place in the village. Without an accurate overview, that uses up-to-date and correct data, the whole Development Plan fails to provide the necessary certainty for applicants, decision makers and villagers.

10. A full audit of the homes built in the village over the last 12 years should be conducted for a year-on-year growth comparison using the position that existed in 2010 as the base. The results of the audit should be made publicly available.

11. A lack of accuracy only leads to a lack of trust. Without transparency, and an accurate starting point, FDC cannot plan and manage growth, or be seen to, with any assurance or certainty.

12. As a small village, Tydd St Giles cannot cope. The NPPF advocates respect for the countryside; it should be conserved, preserved, protected, revered and enjoyed. Fat chance of that happening with all the cash-hungry people with any parcel of land queuing up to grab a piece of the action. Most, if not all, of the projects listed above were in breach of the policies in the Local Plan. So how and why were they ever granted permission in the first place?

13. The 4 houses being built to the west of Magnolia Cottage, on Kirkgate, opposite the golf course entrance, are sitting cheek by jowl with their neighbours, with what can only be described as no more than an intimate space between them. The plots are too small for the houses being built; or are the houses too large? The designs aren't special or high quality, either. They're basic off-the-peg stock offered by any 'flog 'em high' architectural drawing shop.

14. And another two houses are being built to the east of Tindall Mill on Kirkgate which are also indecently close together. The quality of housing is safeguarded and enhanced when the land on which they sit is in proportion to the built size and form. Squeezing them in is detrimental and cheapening.

15. The sylvan appeal of Kirkgate has vanished. And this will be replicated across the village if this draft Development Plan is allowed to proceed in its current form. There's been little control either of numbers being granted permission, or of the design quality. Two of the houses being built on Kirkgate appear to have stalled mid-build, with weeds and rubble surrounding a collection of mostly unused vehicles and a lop-sided caravan. There appears to have been inadequate financial due diligences and oversight.

16. This is a small village with 660 residents, and a village school that is, now, full to bursting. It has a pub that opens some evenings only, and a barber-cum-hairdresser. No shop. No Post Office. No Doctor Surgery. In fact, no other services and none expected, either.

17. If this latest draft version of Fenland District Council's development plan is allowed to proceed, it will decimate Tydd St Giles. The village has managed to stave off a number of undesirable applications over the past 10 or 11 years, and it became quiet for a while.

18. But, over the last year or so, it seems everyone with any land or too much garden is having a go.

19. There's so much at stake that people are either being press-ganged into supporting the applications, agreeing to quid pro quo support, or physically and emotionally harassed and intimidated if they object. This plan will further increase the divisiveness, and create animosity beyond repair.

20. This plan breaches FDC's health and welfare objectives. Living in fear, coping with abuse, the stress of fending off intrusive belligerent behaviour... These are not the tangible outcomes FDC wants with this Plan. This is not a speculative look into the future, either. It's already happening, right now, and will only become worse.

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21. If the planning committee had held true to the stated visions and objectives outlined in the 2014 version of the Local Plan, then there was a chance for this peaceful village to avoid becoming another Parson Drove. Most of the applications that are in at the moment were in breach of the 2014 Local Plan, its objectives, principles and policies. The Draft New Plan in its current format will not be capable of holding back the tide or maintaining control over the destiny of small villages.

22. The much-vaunted vision and objectives have been lost and forgotten. The unique Fenland landscape and the distinct settlement patterns of its villages will become a thing of the past, a piece of history, a part of Fenland folk lore.

23. The Plan's words and phrases have shrugged off their meaning. Fenland District Council appears to be more concerned with increasing its tax revenue than with safe-guarding the countryside, preserving the fenland landscape and the settlement patterns of small villages.

24. Residents move to villages like Tydd St Giles; for its peace, the quiet, the openness, unaware of the undercurrent that's seeking to change the core reason for why people move to small villages in unspoilt Fenland.

25. The newly coined approach seems to be geared to providing sufficient windfall sites to top up the numbers required to meet the quota of new homes. All at the expense of the open countryside and the unique Fenland landscape.

26. Planning Law requires applications for planning permission be determined in accordance with the published development plan, which, in turn, must hold true to the values and principles laid down in the NPPF, unless material and significant considerations indicate otherwise. The Newly Draft Development Plan must, then, follow the principles and policies laid down. In turn, this will then lead to informed planning decisions, making the planning system genuinely Plan-led. Fenland District Council's newly drafted Development Plan lacks the certainty to ensure this will be achieved.

27. The content of the NPPF is clear: 'Succinct and up-to-date local plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.' This is crucial and sits at the heart of what needs tidying up in Fenland District Council's Draft Plan. There is no point having a detailed Plan in place if all its policies and tenets are dismissed and some other procedure is brought in to decide matters.

28. Where policies are tight enough and clear enough, any proposal that comes forward has either been presented with the benefit of a pre-application discussion and the submitted proposal then complies with the outcome of those discussions or, the policies in the Local Plan have been read and understood and the proposal being submitted meets the vision, objectives and policies of the Plan. Anything that doesn't comply is refused. In either case, there's no doubt about how the decision maker should react. Where the policies are clearly defined, a decision maker simply follows the template. Proposals that don't measure up to the Plan's policies are summarily refused. The Draft Plan lacks the certainty and assurance required.

29. Within the National Planning Practice Guidance (NPPG), there is a requirement to allow for public consultation. This should allow members of the public to comment, but only on valid and material planning concerns. 'Local opposition or support for a proposal is not in itself a ground for refusing or granting planning permission, unless it is founded upon valid material planning reasons...'

30. This explicitly favours public comments, whether supporting or objecting, that clearly explain the justifications for the comments being made. Empty rhetoric and blandly negative statements or those responders who do nothing more than tick a box, should not be validated or included.

31. Only where there are special considerations or a super innovative idea has been proposed, should some element of consensus be sought. However, that is the whole point of pre-application discussions. Any one-off or special proposals can be discussed and the policies in the Development Plan challenged to find an acceptable conclusion, a workable compromise before the project is submitted for final consideration.

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32. Within the current draft plan, too much has not been clearly defined. For years, now, important decisions have been thought to be greatly influenced by the number of Objection Vs Support Comments. This has caused endless aggravation, distress, and mistrust. It immediately divides the village, foments arguments and causes stress. The Draft Plan could be vastly improved by making it abundantly clear that only valid and material planning concerns will be considered. This should never be a 'show of hands'.

33. There is perception in this village, that planning decisions are made based on the number supporting the application Vs the number objecting. And the highest number wins.

34. This adversarial approach gathers some traction when the committee meets to consider planning applications and speakers for each side are invited to speak for five minutes. At the end of the speeches, the committee votes for one side or the other. Seemingly, there is too little weight applied to valid planning reasons. Again, if the Plan's policies don't allow it, refuse permission. Unless something special, highly innovative or socially beneficial is apparent.

35. The social consequences of this belief, counting those in favour against those who object, are proving very grave indeed and openly evident in Tydd St Giles. Villagers are press-ganged into support; family and friends (often from outside the village) are given instructions on what to say and told to support the application either with copied wording or just to put a tick in the support box with no comment at all. The sole objective is to have a greater number of supporters than 'the other side' has for objections. This apparent winner-takes-all approach erodes any trust in the Local Plan and the way it's administered.

36. Objectors are being harassed, intimidated and threatened. Some lives even made a misery. That is the very real consequence of what has become an adversarial approach to decide if a project should be granted permission or not. It's a social disaster. It is ruining individual health as well as the cohesive health of our village community. Apart from the village becoming over-developed, with ever more houses shoe-horned into ever decreasing spaces, there is, now, a noticeable Us-and-Them storm-cloud menacing the village.

37. A clear and decisive Local Development Plan that is laid out in line with the NPPF and conducted in line with Planning Law as well as common decency and respect for social consequences, will prevent this community division, preserve social health and protect our village and the unique and distinct Fenland landscape. A clear and decisive plan is essential together with an amended Comments Form that reforms perceptions and rebuilds community trust.

38. The Comments Form within the application process could be amended to remove the support or objection options and their running totals and to invite only valid planning-related comments that materially affect the application, one way or the other. This removes the perception that only votes count, and removes the adversarial nature of the process. It also invites valid, considered and pertinent comments that may well adversely affect near neighbours and local residents, or be of concern to the village as a whole or, indeed, agree with the application for its beneficial contribution to residents, village life or local amenities.

39. There may be a specific reason that has not been covered by the Plan or the Planning Officer may not be fully aware of something local that's pertinent. It would then be up to the Planning Officer to consider the impact of the reason(s) and decide. There is no place for objecting or supporting per se. But there is a place for well-considered and valid comments and reasons, suggestions and ideas.

40. The rhetoric which insists a village needs growth to thrive is misleading. Not everyone wants a town-centre café culture with a shopping mall in a small Fenland Village. People move here, to Tydd St Giles, for its peace, its calm and its open views. That's how it was. That's how it still is, but less so than it was. People don't move here because they foresee it growing into some mini conurbation thinking, 'Yeah! That's just what I need'.

41. Of course not. The attractiveness of Tydd St Giles is judged on the way it looks now. Its attractiveness is exactly that – what it is now. A quiet Fenland village with its openness, wide horizons and huge skies. There are a few with 'property developer' aspirations. But that's where a well-drafted Development Plan comes in. It quells any thoughts of disfiguring an historic, farming-based village with plans to render this a soul-less dormitory town.

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42. Granting permission for ever more homes does not a thriving community make!

43. There is an implied connection between economic growth, development and thriving local communities. For Tydd St Giles, it's difficult to fathom the extent of housing development required to ensure our local community of 660 souls remains thriving. (Although that census count was for 2018 and is way out of date since the Tydd St Giles building revolution gathered momentum, nicking acres of green space in the process).

44. All policies should be underpinned by relevant and up-to-date evidence. Quoting information that's 4 years or more out of date undermines the credibility, functionality and integrity of the Plan as well as the decisions made by Planning Officers, and a Committee that's left having to work with it.

45. Exactly what comprises and determines a 'thriving community'? How is it defined? People are shaping this phrase to suit their individual purpose, so it changes shape and meaning until it becomes meaningless.

46. How and when did we lose our thrive? Or, is our thrive factor only declining? Do we need more building on our sparse green bits to obtain a bigger more acceptable kind of thrive? I've not read anything in the NPPF that qualifies or justifies this approach, one that will culminate in the destruction of small Fenland villages and communities.

47. And what kind of economic growth is envisaged in Tydd St Giles to meet this objective? What shape will this take? Are we to rob more countryside in pursuit of more thrive or a bigger thrive? Do we need to build retail outlets with more car parking attached to encourage their use and build yet more houses to feed them? Should the village jump on the ever rising spiral of more tarmac, more bricks and mortar, more shops that then require even more of everything to survive and become more thriving? Many might say of course not. But the press gangs do see it differently. This minority with land or vested interests will be hard at work to convince everyone they really do need something that won't actually be commercially viable beyond its honeymoon period. The village Post Office and shops have all been and gone. Lauded as highly welcome. Failed for lack of use.

48. A Local Development Plan should be sensitive to its surroundings, and not have an unacceptable impact on local roads. Where Small Villages are concerned, this objective is difficult to achieve by blanket-covering them all with words that might or could apply to any or all. This isn't suitable for a 'one size fits all' strategy. Being sensitive to surroundings requires an individual approach to each Small Village, taking stock of its ethos, noting how its Parish Council works and the extent to which it correctly reflects and respects villagers and the village's place in the wider landscape. Each Parish Council certainly should not have to become an arbiter in the social divide, having to hold the voluble minority in check at its Council meetings. Again, the New Plan should provide more certainty, sufficient to avoid divisions in local communities.

49. The roads in our village are appalling. They're falling apart, crumbling at the edges with dips and bumps that amplify the stress upon the substrata caused by the weight of more and more vehicles. Yet, this is unheeded. Patching little bits here and there doesn't address the underlying problem. Increasing the commuter traffic in and out of the village only makes matters worse.

50. The Draft Plan could include an 'In Principle' stage within its process whereby development proposals are run past a Planning Officer for an 'In Principle' decision. If the proposal is clearly at odds with the policies applicable to the location concerned, and there is no mention of a special circumstance or social benefit or other valid redeeming feature, then the Plan-led approach to the proposal will result in rejection. This would avoid costly consultation procedures and wasted time for FDC, and minimise the community's emotionally draining involvement.

51. If there is something 'special', this could be discussed in more detail at a pre-app consultation and, because it strays from the policies, be set before the Committee to approve after public comments are received. This would require the proposer to include and justify the special reason(s) in the Design and Access Statement so that the project is fully understood and only relevant planning-valid comments would be accepted and considered.

52. The long-term consequences of allowing this current Draft Plan to become live are dire. Yes, most of the housing need will be directed to the four major towns. Some of the largest villages may well be able to cope and expand under the proposed policies. But the smallest villages in Fenland District Council's region will suffer greatly. The countryside

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will be vanquished in pursuit of profit; the collective health will decline rapidly; social division will be the norm; and, a dystopian society will have been born.

53. None are desirable. All are preventable. And prevention is better than cure.

Title:		Position:	
First Name:	Barrie	Organisation:	
Surname:	Luck		
Comment	Object		
I object to the proposed settlement boundary around Tydd St Giles on two bases. Firstly, it is SO restrictive that it will effectively prevent all but the very tiniest infill and I'm not even sure that that is a possibility. I do not wish to see unlimited development of the village, but what you propose is just too tight a strangle hold. All villages need some scope to grow.			
Here is my second objection. The current local plan, under which we work, does NOT have settlement boundaries, which has resulted in some unwelcome development. Kirkgate as a case in point, now known by many as "Millionaire's Row", for the large houses recently built there, which do not reflect the nature of the village. Yet the previous plan DID have them. My objection therefore is not to the presence or absence of boundaries per se, but to this total flip flopping of "policy", which alternates between no growth and unrestricted growth and back again. It's all famine or feast. What we need is sensible, but controlled growth, ideally spanning multiple local plans.			
Whilst I am a member of TSG Parish Council, this is my personal view.			

Title:		Position:	
First Name:	Mark	Organisation:	
Surname:	Knight		
Comment	Neutral		
Concerns over effect of plan on roads and services.			
Concerns over effect on schools, doctors surgery etc.			

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Title:		Position:	Managing Director
First Name:	Andy	Organisation:	ASP Planning and Development Consult
Surname:	Stevens		

Comment **Support**

We support the definition of Wisbech as a Market Town in draft policy LP1. This reflects its categorisation as a 'Primary Market Town' in policy LP3 of the adopted local plan and emphasises its suitability for housing growth. Policy LP3 also termed March as a 'Primary Market Town' and Chatteris and Whittlesey as 'Other Market Towns'. Wisbech was thus considered a centre for major growth. Draft Policy LP1 refers to Chatteris, March, Whittlesey, Wisbech as 'Market Towns' and does not differentiate between them, indicating that the relative importance of Wisbech is reduced.

The Settlement Hierarchy in new policy LP2 allocates housing to the four new Market Towns in the following way, setting out the dwelling supply for each settlement as a percentage of the total housing requirement (%)

March 2,746 dwellings 26%
Chatteris 1,737 dwellings 17%
Wisbech 1,281 dwellings 12%
Whittlesey 886 dwellings 8%

Wisbech is thus reduced from a primary settlement to one that is third in the list of priority locations. There is no explanation for this, particularly when the status of the town has not changed in the interim, and indeed the importance of development in the town as a means of securing a sound economic future is emphasised. This is agreed, but it should mean that there is proper consideration of all major development opportunities in the town, having regard particularly to a full and proper consideration of site constraints so the most appropriate development sites come forward.

We consider that much greater priority should be given to the opportunity to promote development in Wisbech, particularly when there is suitable land that is not presently proposed for allocation, and where the failure to do so is contrary to guidance in the NPPF.

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

Comment **Support**

Policy LP1 Part C – Frontage Infill Development

This includes that the Policies Map identifies areas of land suitable for frontage infill development. This is not shown within the maps unless the proposed settlement boundaries have been extended in areas to allow for infill development. If the latter is the case then the wording of this policy should be reconsidered as it is not clear.

With regards to the opportunities for self-build or custom build houses, the policy does not make it clear whether these would be acceptable on the outside of settlement boundaries. It also does not specify if/how self-build or custom plots will be secured (eg S106 or planning condition).

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

Comment **Neutral**

Policy LP1 Part B - Settlement Boundaries

We are generally supportive of this policy as it provides an element of certainty for applicants and developers with regards to the acceptability of the principle of new development. We would question whether an exception to development outside of settlement boundaries would include tourism uses (for example camping and caravan sites) and whether this should be included in the first point of the policy along with agriculture, horticulture, forestry, outdoor recreation etc.

However, we have concerns that, with the lack of allocated sites which do not have any existing permissions or commencements, the Development Boundaries are very restrictive. A policy or further clarification which allowed for other opportunities outside of Development Boundaries for windfall sites, other than occupational dwellings, would be welcomed.

Title:	Mrs	Position:	Parish Clerk & RFO
First Name:	Sarah	Organisation:	Wisbech St Mary Parish Council
Surname:	Bligh		

Comment **Support**

The Parish Council support moving back to boundaries over the criteria approach, as it gives more certainty, however they are very disappointed to note that FDC has not put forward the sites supported by the Parish Council and is promoting sites that the Parish Council has previously opposed.

Wisbech St Mary has been classified as a medium village when it has been established in recent applications that the primary school is at capacity.

Guyhirn – Small Village A

The Parish Council believe that Guyhirn is not in the correct place in the settlement hierarchy based on the fact that the village has better public transport than any of the other villages or hamlets in the Parish as it served by both the No.46 and the X1 bus routes. It also benefits from a shop, a petrol station and a Pub/Restaurant B&B this would be more appropriate to be classed as a Medium Village.

Thorney Toll

The hamlet is not mentioned in its own right, The Parish Council recommends that it should be listed under Small Village B. The hamlet benefits from major access onto the A47, 2 petrol stations with shops, 2 restaurants and a village hall. It is also worthy of note that it is situated on the X1 bus route.

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Title: Mr **Position:**
First Name: Salim **Organisation:** AE Estate Limited
Surname: Ebrahim

Comment **Object**

I object to the proposed settlement boundary for Turves as set out in Inset Map 23 and attach a revised settlement boundary which includes land on the north side of March Road. This is considered suitable for residential development and should be allocated for such, for the following reasons:

- the site is well related to the built-up part of the settlement of Turves being located immediately opposite existing dwellings
- the site is suitable for frontage development of up to 20 dwellings which could be readily accommodated without harming the landscape character or setting of the village
- appropriate mitigation measures can be included to ensure that there would be noise nuisance to future occupiers from the railway line to the north of the site
- planning consent was granted for residential development to the immediate east of the site for 6 dwellings under application reference F/YR18/1133/F. The principle of residential development in this location has thus been accepted

The Vision for Fenland states that ‘villages will not be left behind’ and the Plan recognizes, through its spatial strategy, that all communities, including rural ones, should benefit from growth to achieve their long-term sustainability. This proposal would ensure that Turves is able to grow in a sustainable way over the lifetime of the Plan.

Title: **Position:** Senior Planner
First Name: Reiss **Organisation:** Marrons Planning
Surname: Sadler

Comment **Support**

Policy LP1 sets out the proposed settlement hierarchy, which guides decisions on the location and scale of new development. The identification of Market Towns, including Chatteris, as the first tier of the settlement hierarchy is supported in principle. However, the distribution of new dwellings within the settlement hierarchy is not supported as set out below under Spatial Strategy.

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Title:	Mr	Position:	
First Name:	Tony	Organisation:	Bidwells LLP
Surname:	Love		

Comment	Object
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The adopted Local Plan (2014) has no settlement boundaries applied. The new emerging Local Plan seeks to establish settlement boundaries.

Fenland has struggled to obtain housing growth previously and, as paragraph 6.10 of the draft Local Plan describes the use of 'no boundaries' within the adopted Local Plan was to enable flexibility for settlements to grow. Paragraphs 6.11 – 6.14 however renege on this approach.

In principle, there is no objection to the introduction of settlement boundaries for a variety of reasons as described under paragraph 6.12 of the draft Local Plan. However, we object to the specific settlement boundary proposed for March, both for draft Policy LP1 and the associated emerging policy map propose for March.

The land is adjacent to the established settlement of March. March is a 'market town', which represents the most sustainable settlement type within the settlement hierarchy and which the town provides a range of services including schools, retail provision and health centres, accessed via nearby trunk roads including the A141. The Site is clearly sustainable for housing development.

In terms of ensuring deliverability, the pending planning application F/YR21/1497/O includes a range of concept layouts, the concept and masterplan (Drawing number 9339-L-107, Revision B) throughout the application site. This includes an indicative road network accessible from the south, with clear provision to extend northwards up to Burrowmoor Road. Land north of this application will therefore come forward if this layout is approved. With regards to the determined proposal F/YR20/0223/BCP, the approved 'broad concept plan' indicates access from Gaul Road to the north. This application for the broad concept plan was approved in 14 July 2021 by planning committee. It relates to the West March Strategic Allocation and secures extant consent for the Broad Concept Plan for the whole West March site. Not only do these access points improve the sustainability of the Site but demonstrate how this parcel would be delivered. Even if the BCP were to fall away, the indicative layout plans to F/YR21/1497/O demonstrate that a recognition that land north of draft Policy allocation LP39.01 would eventually come forward, almost akin to a second development phase. Finally, the proposed layout plans (Drawing reference 101-028/P003K) supporting the underdetermined development at Gaul Road (F/YR21/1175/F) clearly highlight a vehicular route heading southward, towards Parcel 3 land that is adjacent to Parcel 7. There is a clear intention by the landowner of this pending application to enable development to the south, to meet the requirements of the adopted allocation. If the landowners to Parcel 3 are submitting representations under this consultation, this provides high significance in answering the deliverability concerns highlighted by the Council.

Additionally, the Applicant of Parcel 7 has agreed that pedestrian access could be obtained to the Parcel 7 site via the existing access to Cherryholt on Lewis Close, which would further enhance the sustainability of the Site, as well as its capacity to be delivered (see Appendix 1: Location Plan). There is sufficient space to construct a 2m wide footpath between the east boundary of the Site and the east-facing elevation of the nearest agricultural building adjacent to this site. Whilst the full technical detail would need to come forward, the access is not subject to adverse constraints. The private vehicular access and associated private parking to Cherryholt can be maintained and the gap between the east-most agricultural building and east boundary would enable a 2m wide footpath to be constructed. For the avoidance of doubt, no trees, protected under preservation orders, would be lost as a result of the construction of the footpath.

The settlement boundary proposed for the Draft Local Plan however abuts to the existing built boundary that is west of Lewis Close, Conway Close and Willow Drive. The boundary does not include all land that was previously allocated under Policy SP9. The Site however is sustainable, as demonstrated under the current Local Plan and the Council clearly accepted a provision then for development to protrude near to the A141. As such, this highway denotes an appropriate

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settlement edge to serve the settlement March, especially if this segment of the overall Policy LP9 allocation is secured consent prior to adoption of the emerging Local Plan.

Consequently, as a result of the proposed settlement boundaries, we object to draft Policy LP18, which would subject sustainable land for housing development (including ‘Parcel 7’ and the agricultural land immediately adjacent to it) within the open countryside.

Recommendation: Given the Site’s sustainability and suitability for development, where there is a general need for housing, we recommend that the settlement boundary is extended to include not only Parcel 7, but to match to the Policy LP9 allocation of the previous Local Plan. This would remove the objection to draft Policy LP1, Policy LP18, as well as to the draft March policy map.

Title:	Ms	Position:	Chair
First Name:	Ruth	Organisation:	Doddington Parish Council
Surname:	Huften		
Comment	Support		
Fully support the reintroduction of settlement boundaries.			

Title:	Ms	Position:	Chair
First Name:	Ruth	Organisation:	Doddington Parish Council
Surname:	Huften		
Comment	Object		
Part B para 6.5			

Doddington is recognised as a Large Village, but has constraints which would preclude it from the amount of growth being asked of it.

These are lack of useable sewerage facilities for current housing stock; lack of public transport; school and surgery at capacity (residents unable to get their children into the school, residents being asked to attend treatment at surgeries in adjoining villages); lack of affordable housing meaning young families cannot afford to live here; poor road system ; etc.

Title:		Position:	
First Name:	Liz	Organisation:	ICIS consulting limited
Surname:	Dent		
Comment	Object		
The policy reads that - Land outside the settlement boundaries is defined as countryside and that development in the Countryside will be limited to very specific criterion.			
We regard this as overly restrictive and prevents growth.			
Section 7. Growth Strategy- states that the local plan should take a more flexible approach to economic growth.			
7.11 states that when taking into account the CPCA’s ambition to ‘double economic output across Cambridgeshire and Peterborough by 2040’ the new Local Plan should take a much more flexible and facilitative approach to economic growth.			

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Title:		Position:
First Name:	Terence	Organisation:
Surname:	Brown	
Comment	Object	
Part B		

I understand the value of settlement boundaries in preventing ‘development creep’ into the countryside but I do not think there should be an absolute ban on backfill or tandem developments on land adjacent to the settlement boundary. An exception is proposed for linear development within ‘Settlement Hinterlands’ but no further exceptions seem to be possible or permitted within the draft Local Plan for backfill. Planners should have some discretion to accept limited backfill development, rather than ban it completely in all circumstances which appears to be the position in the draft plan.

Part C

The Settlement Hinterland Boundary will become a key issue when determining whether planning applications for new properties are acceptable or not. The definition as currently stated in the draft plan is hard to understand. I suggest including some specimen examples (including maps/diagrams) to make clearer what the words used in the definition actually mean in practice. Without greater clarity there is a danger that too little or too much development on the edge of settlements will be permitted.

LP1: The Settlement Hierarchy and the Countryside

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

Comment	Object
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Policy LP1: Settlement Hierarchy outlines in Part A, the settlement hierarchy for FDC and stipulates that decisions on the location and scale of development will be taken on this basis. Gladman recognise the expectation that development should have regard to a settlement's position in the hierarchy, thus the same applies when defining the spatial strategy and allocating sites.

Gladman support the definition of Whittlesey as a Market Town. This suitably reflects the settlement's capacity for growth, the range of services and facilities available to residents and the transport connections across the District. However, as the housing requirement is lower than it should be, and should further account for a buffer, Gladman consider that 886 dwellings is too low. The settlement is highly sustainable and could accommodate a higher level of growth.

Further, Gladman recognise the suitability of Doddington and Wimblington as Large Villages. However, in the current Local Plan, they are referred to as 'Growth Villages'. Gladman consider this a more suitable title for the tier as it accurately reflects their potential to accommodate growth. As with the Market Towns, the allocation of 789 dwellings to be delivered across these villages should be increased when the housing requirement figure is corrected to reflect up to date Local Housing Needs and an appropriate buffer for flexibility.

Part B of the policy goes on to outline the role of settlement boundaries in controlling development. Gladman object to the use of settlement limits if these would preclude otherwise sustainable development from coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework.

Indeed, there are a number of Local Plans that have now opted to remove settlement boundaries and instead follow a criterion-based approach. Such an approach will still allow the Council control over where development would be supported whilst allowing good housing sites consistent with the principles outlined in Policy LP7 to come forward to meet identified housing needs.

It is vital that the Local Plan provides a suite of flexible policies that are able to positively respond to changing circumstances over the plan period, particularly when the Spatial Strategy does not, at this time, correctly calculate the housing requirement in line minimum housing Local Housing Needs figure.

Title:	Councillor	Position:	
First Name:	Gavin	Organisation:	Parson Drove Parish Council
Surname:	Booth		

Comment	Object
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LP 1 Settlement hierarchy on page 23. Parson Drove is classified as a medium village when it suffers from very poor public transport and is recognised for its rural isolation. Conversely somewhere such as Guyhirn which has very good public transport and similar facilities is classed as a small village A. Parson Drove should be classed as a small village A.

Also note that part C of policy limits number of houses to 3 and question this number. Also believe that a criteria for Part C, should be that any application has support of the Parish Council, which is in line with Parson Drove Neighbourhood plan, which sets the number at 4.

LP1: The Settlement Hierarchy and the Countryside

Title:	Councillor	Position:	
First Name:	Gavin	Organisation:	Parson Drove Parish Council
Surname:	Booth		
Comment	Support		

Support moving back to boundaries over the criteria approach, as it gives more certainty.

Title:		Position:	
First Name:	Dave	Organisation:	
Surname:	Sheldon		
Comment	Neutral		

I wish to put my property forward for garden development, for a pair of semi-detached houses, (each house 950ft2 to 1000ft2).

The property is located off the A605, frontage of site would have a 5 to 6 metre wide access providing in and out access off A605, parking for up to 8 vehicles, and plenty of room for a large 10metre long lorry to park on site, with no obstruction to A605 traffic.

The property is located on a double plot since first built circa 1935.

The pair of houses would be designed; to enhance façade of existing semi-detached properties, comply with key policies for housing and climate change. The small development would assist Fenlands housing need

Title:	Mr	Position:	
First Name:	Chris	Organisation:	
Surname:	Hodder		
Comment	Object		

I object to part C - Frontage Infill Development and the term ‘settlement hinterland’

These changes will remove any protection afforded to the open countryside and the distinctive character of the Fenland landscape and I believe they go against the intentions of the NPPF to protect the open countryside. It will create linear development outside the settlement boundary where development is usually loose knit, it will close up the gaps between the main settlement and this spacious loose knit development, in turn creating additional ‘residential infill’ plots in the process. Fenland Council has essentially renamed the ‘open countryside’ as ‘settlement hinterland’ which is questionable to say the least.

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Title:	Mrs	Position:
First Name:	Suzanne	Organisation:
Surname:	Hodder	
Comment	Object	

I object LP1 and to the new terminology of ‘Frontage Infill Development’ and ‘Settlement hinterland boundary’ and its intentions to allow development beyond the settlement boundary. I question the intentions of the council with regard to this policy? It will create linear development something not previously supported and with the introduction of up to three properties in many instances this would then create further ‘residential infill’ opportunities as the developments creep closer to the more remote and loosely developed areas of our villages. This policy is contradictory when it comes to protecting the open countryside, who will get to decide which gaps within a settlement are important? Who will decide whether the property furthest outside the settlement boundary is an individual isolated dwelling as opposed to part of that settlement? This new wording leaves the planning process open to abuse and it leaves our open countryside under threat. I believe this new wording is going against the NPPF with regard to protecting the open countryside and it needs looking at.

Title:	Position:
First Name:	Organisation: Ely Diocesan Board of Finance
Surname:	Ely Diocesan Board of Finance
Comment	Object

Part C Frontage Infill:

We object to the inclusion of the word infill. The policy should read frontage development. Infill has specific and precisely referenced meaning within planning policy. The type of plots that may become suitable will be varied and not necessarily conform with standard definition of infill. The standard definition is an underdeveloped plot between existing properties. The criteria based approach is more appropriate and consistent with the approach of the NPPF. The NPPF in particular at paragraph 78 and 79 anticipate a need for villages to grow in size. Some of the villages with tight boundaries such as Benwick, Coates are classified as medium villages and there should be a degree of flexibility within the policy situation.

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Title:

Position:

First Name: Kate

Organisation: Eddisons

Surname: Wood

Comment **Support**

Part C:

NPPF paragraph 69 encourages the development of small and medium sites as these can be brought forward quickly. This is vital to ensure a 5-year supply of housing land is maintained. Paragraph 69.a) requires at least 10% of LPA's housing requirements to be accommodated on sites no larger than 1ha. Paragraph 69.c) supports the development of windfall sites within existing settlements. Paragraph 78 acknowledges that exception sites can be facilitated by including some market housing. Paragraph 79 encourages the promotion of sustainable development in rural areas through opportunities for villages to grow and thrive in order to enhance and maintain the vitality of rural communities.

I represent several clients who have small sites or are small house-builders. Sites within the development limits of villages are a finite resource and opportunities to add dwellings to villages needs to be balanced between stuffing villages with new development at the expense of maintaining their rural character, and extending them into the countryside whilst maintaining their village character.

To this end it seems that extensions to the edges of villages and existing built form such as ribbon development is an appropriate and NPPF-compliant way to facilitate windfall / edge of settlement development with some degree of certainty for landowners and small builders. Sites of up to one hectare would support the NPPF requirement to accommodate at least 10% of housing requirement on smaller sites, and would support the vitality and viability of villages and their facilities and services including shops, pubs, bus services and primary school PANs. The proposed Policy LP1, part C would achieve this. Sites of this size can be developed quickly.

Acknowledging and encouraging small developments on the edges of settlements through a criteria-based policy such as this is more suited to addressing opportunities as they arise. Whilst sites can and are promoted for allocation, it is sometimes the experience that focusing allocations to a small number of large development sites (SUE's etc) results in no allocations at all lower in the settlement hierarchy, leading to missed opportunities for faster delivery, natural growth, variety and choice.

A windfall / edge of settlement sites policy such as LP1 part C provides certainty when these opportunities arise and, when utilised alongside policies relating to larger sites, will facilitate mixed and balanced communities. It should therefore be supported.

Ideally, the policy would also be expanded to allow for windfall sites up to one hectare that are not ribbon development. This would facilitate the provision of more dwellings than the 3 allowed for in the policy, which in turn local facilities through S106 / CIL, particularly where the threshold for affordable housing provision is met. There are plenty of opportunities on the edges of villages for such windfall developments. Up to 30 houses on a 1ha site (i.e. up to 30dph) would meet the requirement to make the best use of land and would be of sufficient critical mass to secure affordable housing and other community benefits.

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Title:		Position:	
First Name:	AJ	Organisation:	
Surname:	Bryant		

Comment	Object
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I understand that Part C of LP1 is intended to promote attenuated development on the frontage of roads leading from a settlement, rather than a policy which could be abused just to extend the body of the settlement itself. Therefore, I propose the following change to prevent the frontages policy being abused in that way.

Part C - Frontage Infill Development

The opening paragraph to have the words (enclosed by 3 asterisks) inserted into the text:

"Recognising the historic, linear pattern of development in the district, land ***adjacent to a highway*** leading directly or indirectly out of a settlement, but outside of the defined boundary (as shown on the Policies Map), ***where that highway does not itself form part of the settlement boundary, *** could be suitable for residential frontage development of up to 3 new homes in the settlement hinterland*. These plots will be particularly suitable for self-build or custom build homes in accordance with Policy LP13, or for prestige or executive homes. Any frontage development must meet the following criteria"

Title:	Mr	Position:	
First Name:	PJ	Organisation:	
Surname:	Bryant		

Comment	Object
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I understand that Part C of LP1 is intended to promote attenuated development on the frontage of roads leading from a settlement, rather than a policy which could be abused just to extend the body of the settlement itself. Therefore, I propose the following change to prevent the frontages policy being abused in that way.

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LP1: The Settlement Hierarchy and the Countryside

Title:

Position:

First Name: AJ

Organisation:

Surname: Bryant

Comment

Object

I understand that Part C of LP1 is intended to promote attenuated development on the frontage of roads leading from a settlement, rather than a policy which could be abused just to extend the body of the settlement itself. Therefore, I propose the following change to prevent the frontages policy being abused in that way.

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Title:

Position:

First Name: Richard

Organisation:

Surname: Humphrey

Comment

Object

BACK ROAD MURROW - Potential building land excluded in draft map

Why does the red line indicating possible building land not run in a straight line at the rear of all the properties on the north side of Back Road, Murrow? For some reason land at the rear of numbers 1, 3 and 5 has been excluded but all the other back gardens to the east of No 5 are included. In my opinion the red line should run parallel to the drain as far as Murrow Bank and include all back gardens north of the properties

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Title: Mrs **Position:**

First Name: Beryl **Organisation:** Leverington Parish Council

Surname: Boyce

Comment **Object**
Comments by the Council on the draft Local Plan by Fenland District Council

- Leverington is classed as a medium village in the report but has always been a low village.
- Two sites have been identified for development , 96 dwellings at land east of Woodgate Road and 100 north of Parson Drove Lane. The 221 dwellings along Sutton Road that are part of Leverington are not taken into consideration as Leverington by the planners.
- There is no infrastructure to support all this building – no doctor’s surgery, no school places available (some Leverington children have to go to Wisbech Peckover now).
- There is no width to the roads for a cycle/mobility route. The village roads are classed as ‘lanes; in many cases and the surfaces will not take the extra weight of traffic. The Council is not in favour of over development in this rural village that will spoil the peaceful environment. The sites in question are prone to flooding in the winter months.

Title: **Position:**

First Name: Victoria **Organisation:** Barton Willmore

Surname: Yeandle

Comment **Support**
Metalcraft supports this draft Policy.

Metalcraft agrees that Chatteris should be defined as a ‘market town’ and is therefore ideally suited to accommodate employment growth (Part A). The proposed allocation for employment uses adjacent to the Metalcraft site is considered entirely appropriate to positively contribute towards this employment need.

Metalcraft is pleased that the settlement boundary of Chatteris has been expanded to incorporate its proposed allocation from the indicative urban area in the Combined Authority Report for Chatteris (Chatteris: Aspirational Community: Final Report). Therefore, Metalcraft supports Part B of the draft Policy LP1.

Title: **Position:**

First Name: Carole and Susan **Organisation:**

Surname: Fisher

Comment **Support**
LP1 Part A
We agree that March should be one of the settlements at the top tier of the settlement hierarchy.

LP1: The Settlement Hierarchy and the Countryside

Title:		Position:	
First Name:	Paul and Belinda	Organisation:	
Surname:	Clark		
Comment	Support		
LP1 Part A			
We agree that March should be one of the settlements at the top tier of the settlement hierarchy.			

Title:		Position:	Development Planner
First Name:	Katie	Organisation:	Persimmon East Midlands
Surname:	Dowling		
Comment	Object		
LP1, Part B - Settlement Boundaries			

The site boundary put forward for March as part of this review includes land which in the 2014 Local Plan formed part of the West March Strategic Allocation but has now been removed. As Persimmon Homes have detailed in our comments to housing allocation policy LP39.1, we are of the view that this allocation should include all of the land contained within the allocation for West March as shown in the 2014 Adopted Local Plan. A Broad Concept Plan has now been approved for this wider allocation and since its approval in July 2021, three further sites have come forward with planning applications which do not form part of LP39.1.

There are clear benefits in replicating the 2014 site allocation boundary including, most importantly development being in accordance with the approved Broad Concept Plan and each site providing a proportionate amount of infrastructure required from a strategic allocation. Persimmon Homes are of the view that the allocation should be increased in size and replicate that in the 2014 Plan. However, if the allocation is not increased in size in line with our comments, Persimmon Homes are of the view that the land now removed from the allocation should not form part of the settlement boundary for March.

Please see attached Document 9339 Broad Concept Plan and 9339-L-101-C Location Plan to accompany this response.

LP1: The Settlement Hierarchy and the Countryside

Title:	Councillor	Position:	
First Name:	Ruth	Organisation:	Doddington Neighbourhood Plan Group
Surname:	Hopkins		
Comment	Object		
Policy LP1 Part A			

Whilst the Doddington Neighbourhood Plan Group accepts that Doddington is within the second tier of the settlement hierarchy within Fenland the Group fundamentally disagrees with the scale of new housing being proposed for the village.

See the responses in relation to Policy LP2.

Policy LP1 Part B

The Group agrees with the location of the settlement boundary for Doddington other than where it includes housing allocations which the Group feels are not suitable. Those locations should be removed from the settlement boundary and be placed within the open countryside for planning policy purposes.
The Group also considers that the word ‘All’ should be added before ‘Development’ on the third sentence.

Policy LP1 Part C

The Group objects to this Policy as the wording (including the definition of settlement hinterland boundary) is unclear and very much open to interpretation. For example if land is ‘wholly and exclusively identified as being integrally part of that settlement’ then surely that land should be within the settlement boundary in the first instance?

The Group feels that whilst the logic of Part C of the policy is understood (i.e. in order to enable limited growth (perhaps including self-build homes) on the edge of the village) this approach is not sufficiently justified and contains may subjective tests which may be applied inconsistently as a result.

The Group feels that Part C of the Policy should be removed.

Overall the Group considers that Parts A and B of Policy LP1 are not sound as they are not justified by appropriate evidence (which is considered further by the Group in their response to Policy LP2). At present Parts A and B are contrary to national policy as they advocate large scale new housing development in less sustainable locations. The plan needs to allocate more new housing and jobs with the Market Towns.

The Group feels that deleting Part C of the policy would be a sound approach as the policy is not effective owing to its lack of precision; nor is the policy justified given it could promote significant new housing in countryside locations. Part C is currently contrary to NPPF paragraph 16 d) as the wording is ambiguous.

LP1: The Settlement Hierarchy and the Countryside

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

Comment **Object**

Part B Settlement Boundaries As drafted Policy LP1 provides a presumption in favour of development within the settlement boundaries but this may not always be sustainable and may be incompatible with the requirements of the NPPF.

We appreciate that given the rural nature of the District that it may not be feasible to undertake a very detailed assessment of every single potential development site, particularly at this small scale of development. Nonetheless the Councils have a duty to ensure that the Local Plan meets the requirements of the NPPF in relation to the historic environment.

To this end it would be helpful to include reference for the need for proposals to meet other Plan policies. We suggest adding the following: Proposals within the settlement boundary will be supported in principle, subject to compliance with other Local Plan policies. Particular care should be taken in sensitive locations such as conservation areas of near to listed buildings, registered parks and gardens and scheduled monuments.

Suggested Change - We suggest adding the following: Proposals within the settlement boundary will be supported in principle, subject to compliance with other Local Plan policies. Particular care should be taken in sensitive locations such as conservation areas of near to listed buildings, registered parks and gardens and scheduled monuments.

Part C Frontage Infill Development We welcome the reference to the historic environment in the final bullet point but suggest this is extended to include the setting so scheduled monuments and registered parks and gardens.

Suggested Change - Amend to read: setting of any listing buildings, scheduled monuments or registered parks and gardens.

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

Comment **Object**

We note the settlement hierarchy and spatial strategy for the distribution of housing growth (estimated 10,525 dwellings), is based on evidence developed by the council, but it is unclear whether it has been informed by the Outline Water Cycle Study. We would support a further iteration of the Water Cycle Study to enable updates following the publication of the Drainage and Wastewater Management Plan (DWMP) and the emerging Water Resources Management Plan (WRMP24) and other matters raised through this submission; this would provide a quantitative evidence base which would help inform the spatial distribution and phasing of growth and the compliance of the options proposed with the sustainability hierarchy.

We would also support a methodology that quantifies the carbon emissions that the site and its supporting infrastructure would generate through is construction and then use. This approach reduces the capital (embedded) carbon for new infrastructure and focusses future investment for improvements in fewer locations.

LP1: The Settlement Hierarchy and the Countryside

Title:

Position:

First Name: Carole and Susan

Organisation:

Surname: Fisher

Comment **Object**

LP1 Part B

We agree that the settlement boundary for March is appropriate albeit it appears to us that further new development could be accommodated within sustainable locations across the town as opposed to locating development in lower order settlements.

The strategy for allocating such large quantum's of new housing within settlements below the Market Towns does not appear to be justified by sufficient evidence. The Market Towns within Fenland are sustainable locations to deliver additional housing growth given their proximity to public transport, employment and services. All of the villages within Fenland (whether defined as Large, Medium and Small within the draft Local Plan) have relatively poor access and so locations within and close to the Market Towns should be the preferred location for new housing and growth.

It is understood that part of the strategy for placing housing within the villages was the lack of delivery of development within the broad locations of growth which is a requirement within Policy LP7 of the current Local Plan. Such a requirement evidently restricted some locations being brought forward but this appears in part to be the result of the need for multiple landowners to co-operate. In hindsight the policy was always very unlikely to deliver the required growth.

The policy approach within LP2 is not sound as it is not justified in that insufficient evidence and analysis has been undertaken to consider why the previous (current Local Plan) policy approach has seemingly failed. In addition no analysis of the impacts of placing large amounts of housing within the villages has been presented. It appears that all 4 of the Market Towns could accommodate additional housing growth and that a figure of 30% growth (of existing housing stock) across each Market Town would be a reasonable proxy. It has not been set out as to why Wisbech and Whittlesey in particular are not able to accommodate additional housing at larger scales than is currently proposed.

There are locations in March that are within the proposed settlement boundary but are not allocated – whilst these would count towards the windfall allowance they should (if deliverable) be included as new allocations in their own right.

The policy will also not be effective in delivering housing growth and it will also not deliver sustainable development as required by the NPPF. The plan could be made sound by reviewing the location of new housing growth across the District and by placing development in the most sustainable locations within the District.

The current distribution of housing is therefore flawed.

LP1: The Settlement Hierarchy and the Countryside

Title:		Position:	
First Name:	Paul and Belinda	Organisation:	
Surname:	Clark		
Comment	Object		
LP1 Part B			
We agree that the settlement boundary for March is appropriate albeit it appears to us that further new development could be accommodated within sustainable locations across the town as opposed to locating development in lower order settlements.			
The strategy for allocating such large quantum’s of new housing within settlements below the Market Towns does not appear to be justified by sufficient evidence. The Market Towns within Fenland are sustainable locations to deliver additional housing growth given their proximity to public transport, employment and services. All of the villages within Fenland (whether defined as Large, Medium and Small within the draft Local Plan) have relatively poor access and so locations within and close to the Market Towns should be the preferred location for new housing and growth.			
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The policy approach within LP2 is not sound as it is not justified in that insufficient evidence and analysis has been undertaken to consider why the previous (current Local Plan) policy approach has seemingly failed. In addition no analysis of the impacts of placing large amounts of housing within the villages has been presented. It appears that all 4 of the Market Towns could accommodate additional housing growth and that a figure of 30% growth (of existing housing stock) across each Market Town would be a reasonable proxy. It has not been set out as to why Wisbech and Whittlesey in particular are not able to accommodate additional housing at larger scales than is currently proposed.			
There are locations in March that are within the proposed settlement boundary but are not allocated – whilst these would count towards the windfall allowance they should (if deliverable) be included as new allocations in their own right.			
The policy will also not be effective in delivering housing growth and it will also not deliver sustainable development as required by the NPPF. The plan could be made sound by reviewing the location of new housing growth across the District and by placing development in the most sustainable locations within the District. The current distribution of housing is therefore flawed.			

Title:		Position:		Senior Planner
First Name:	Reiss	Organisation:		Marrons Planning
Surname:	Sadler			
Comment	Support			
Policy LP1 sets out the proposed settlement hierarchy, which guides decisions on the location and scale of new development. The identification of Market Towns, including Chatteris, as the first tier of the settlement hierarchy is supported in principle. However, the distribution of new dwellings within the settlement hierarchy is not supported as set out below under Spatial Strategy.				

LP1: The Settlement Hierarchy and the Countryside

Title:

Position:

First Name: Kirsty

Organisation:

Surname: Patterson

Comment **Object**

I oppose the decision not to designate the whole of LGS 1 (Wenny Meadow) as a Local Green Space.

There is no good reason why Wenny Meadow could not be designated as a Local Green Space in its entirety given that the large number of nominations for Wenny Meadow were for the whole site. The site meets all of the criteria. There has been no progress on the planning application and a developer should not be able to hold land hostage in a Local Plan review, especially when a site is not viable.

Chatteris Town Council held a poll on the question “Would you like Wenny Meadow to be designated as a local green space and protected from development?” which resulted in a 92% “yes” vote. This democratic mandate has not been fulfilled by the Town Council’s response to this consultation. Any response from the Town Council contrary to the poll would be undemocratic and unrepresentative.

Title:

Position:

First Name: Danny

Organisation:

Surname: Moore

Comment **Object**

I am objecting to the Local plan as it is marked out at the moment with the red line where it is, if this stays in place going forward, this will mean that there will be no more development within Tydd St Giles over the next 18 years, and as quoted by one of our local Councillors the village will die.

Looking at the Village Lay out, there is scope to add development still keeping the core shape of the village by adding the West Side of Church Lane and the South Side of Newgate Road, these are the only two area's within in the village with Houses on only one side of the road. I feel it would make sense for these to be included to keep the shape of the village as it is.

If development is not permitted within the village the School, public house will be in danger of closing, as there would be no new families coming in.

Title:

Position:

First Name: Sandra

Organisation:

Surname: Blackburn

Comment **Object**

We need to keep wenny meadow for all the birds and animals that you see there, it has been her for years and is well used by walkers and families, and there are plenty of other places in town for housing without ruining this site.

LP1: The Settlement Hierarchy and the Countryside

Title:	Councillor	Position:	
First Name:	Dave	Organisation:	Newton-in-the-Isle Parish Council
Surname:	Gibbs		

Comment Object

The Parish Council’s Planning Committee considered the Draft Local Plan at their meeting on 11 October and have a number of concerns regarding the potential impact of the plan on life in Newton-in-the-Isle.

Firstly, throughout the document, with a couple of exceptions, the name of our village has been abbreviated to Newton. Please ensure that the full name is used in every case.

Members were disappointed to see Newton-in-the-Isle categorised as a Small Village B alongside a selection of hamlets. In population terms, our village is out of kilter with this category.

The restrictive nature of the new proposed settlement boundary (Inset 18) and the shortage of available sites for future development will stifle the natural growth that is necessary for the long-term sustainability of the village. This is unacceptable. Paragraph 6.7 of the Draft Plan addresses this issue succinctly, thus: “However, it is also recognised that smaller communities should benefit from an appropriate level of growth to ensure their long-term sustainability.” The decision to define 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 these should be included within the settlement boundary. A more flexible approach to the settlement boundary is required and the Parish Council is keen to work with officers to consider all options to facilitate this.

The Environment Agency’s Flood Map for Planning at the eastern end of the village is not fit for purpose, based, as it appears, on two conflicting data sets. Environment Agency officers have confirmed that this is the case. For this reason, it should be disregarded in determining the suitability of individual sites. The development of site 40191 carries 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 at national speed limit. 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.

In order to address the Council’s concerns, members request that a senior planning officer visits Newton-in-the-Isle to discuss the draft proposals in more detail and to consider site-specific issues within the general policies and the new hinterland provisions to provide the Parish Council with the clarity to advise residents and to fulfil its statutory obligation as a consultee on future applications.

LP1: The Settlement Hierarchy and the Countryside

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

Comment **Neutral**

Part C - Frontage Infill Development

Comment - The contents are noted. In respect of the interests of the Commissioners and associated Boards you are advised that:

a. Provided that their requirements are met in respect of the issuing of consent for encroachment as required under their Byelaws; The Middle Level Act 2018 or as required under Section 23 of the Land Drainage Act (LOA), the Commissioners will generally promote the use and enhancement of their navigation system and do not object to small infill developments, say up to 3 houses, within the extent of the "urban boundaries", and the replacement of existing properties.

Please note that the "urban boundaries", may not align with the Settlement Boundaries as identified on the Policies Maps, or the Settlement Hinterland Boundary described on page 24.

b. The Commissioners will not permit, under their byelaws, new 'ribbon' development alongside any of their watercourses.

c. Any waterside development should be in accordance with the objectives of The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, which covers many items and is not just related to water quality.

d. Where possible new properties should "front" on to the watercourse concerned.

e. When and where possible the Commissioners and associated Boards will try to reinstate currently restricted access alongside their protected watercourses.

Title:		Position:	Director
First Name:	Becky	Organisation:	Johnson Mowat
Surname:	Lomas		

Comment **Object**

Policy LP1: Settlement Hierarchy

Part A – Settlement Hierarchy

2.1.1 We are supportive of the Settlement Hierarchy which identifies the Market Towns, of which Chatteris is one, at the top of the hierarchy. That decisions on investments and the scale of new development should be taken on the basis of the settlement hierarchy is appropriate and supported.

Part B – Settlement Boundaries

2.1.2 It is right that settlement boundaries should be demarcated on the Policies Map. Noting that land outside of development limits is defined as countryside, and that development in the countryside should be restricted, the Council should be clear that the proposed settlement limits are appropriately drawn to accommodate the anticipated housing need for the District and accommodate proposed employment and housing allocations.

LP1: The Settlement Hierarchy and the Countryside

Title:		Position:	Senior Land and Planning Consultant
First Name:	Ian	Organisation:	Boyer
Surname:	Long		
Comment	Support		
Part A sets out the proposed settlement hierarchy with March being at the highest tier. We agree that March, as one of the Market Towns, should be within the highest tier of the settlement hierarchy and therefore should be expected to accommodate a commensurate scale of growth reflective of its sustainability as a settlement.			
Part B of Policy LP1 sets out the proposed settlement boundaries as defined on the Draft Policies Map. In addition to this, we agree that proposals on land within the settlement boundaries, as defined in the Draft Policies Map, are to be supported by the Council in principle. This serves to ensure that the Policy will act in accordance with the overall thrust of the National Planning Policy Framework (NPPF), and particularly Paragraph 60 of the NPPF, which outlines the Government’s objective of significantly boosting the supply of homes by enabling land to come forward where it is needed, in sustainable locations.			
It is noted that the settlement boundary of March is proposed to be amended in the Draft Policies Map, with ‘Land west of Princess Avenue, March’, as shown in Appendix One, being included within the defined settlement boundary. As such, any proposals for the land, such as that currently subject to an ongoing outline planning application as detailed in Paragraph 1.2 of these representations, are compliant with the provisions of emerging Policy LP1 regarding principle of development. These representations support this amendment to the settlement boundary.			

Title:		Position:	Associate Director
First Name:	Aaron	Organisation:	Strutt & Parker
Surname:	Coe		
Comment	Support		
Strutt and Parker have prepared this representation for Strategic Assets on behalf of Cambridgeshire County Council in its role of landowner.			

Policy LP1: Settlement Hierarchy

The district of Fenland falls within the Cambridgeshire and Peterborough Combined Authority (CPCA) area which has ambitious proposals and funding related to growth, economy and infrastructure. The Local Plan acknowledges that Fenland’s market towns and its rural economy have a key role to play in achieving these ambitions. The district includes the four market towns of Chatteris, March, Whittlesey, and Wisbech and around 30 villages. It is a predominantly rural and sparsely populated district with diverse communities. The new Local Plan must deliver appropriate levels of growth to meet the competing needs of the differing communities across the Plan area.

In order to do this, the Plan has established a settlement hierarchy in Policy LP1 to assist with determining the overall distribution of growth. The hierarchy has been based on the Fenland Survey of Existing Services and Facilities Study (May 2022) which has established in which tier the respective settlement should sit and explains the rationale in more detail. Fundamentally, the hierarchy seeks to steer most new development to those larger places that can offer the best access to services and facilities while recognising that smaller communities also required to benefit from an appropriate level of growth to ensure their long-term sustainability.

The County Council supports this strategic approach and the use of a settlement hierarchy as a guide to the distribution growth.

LP1: The Settlement Hierarchy and the Countryside

Title:		Position:	
First Name:	Andrew	Organisation:	Pegasus Group
Surname:	Hodgson		

Comment	Object
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These representations are submitted by Pegasus Group on behalf of Seagate Homes Ltd who has land interests at East Wisbech.

Seagate Homes have a hybrid planning application submitted on 'land to the East of Stow land, Wisbech' (F/YR22/0844/O) for up to 325 dwellings. This land forms part of the East Wisbech strategic allocation (Policy LP8) for residential development in the adopted Fenland Local Plan 2014.

The East Wisbech allocation, similar to many other strategic allocations, has remained undeveloped; however, this important allocation is proposed for removal from the Emerging Local Plan. These representations justify the need to re-include this strategic allocation in this sustainable location.

Our client fully supports Draft Local Plan Policy LP1. The Draft Policy outlines that growth should be focused on the four market towns (including Wisbech), where the majority of the District's new housing, employment growth, retail growth and wider service provision should take place.

Notwithstanding this, it is considered that the level of housing development proposed for Wisbech in the Local draft Plan will not meet the needs of present and future generations in accordance with the 'social objective' of NPPF Paragraph 7 (2021). In order to meet this objective, it is considered that all opportunities should be taken to provide a flexible housing delivery strategy to ensure an adequate provision of housing is maintained in the most sustainable locations.

The District's housing requirement for this Draft Local Plan consists of 517 dwellings for the period 1st April 2021 to 31st March 2022 (1 year) plus 556 dwellings in each year from 1st April 2022 to 31st March 2040 (18 years), thereby providing a total requirement of 10,525 dwellings from 1st April 2021 to 31st March 2040. The draft Local Plan outlines that since the Local Housing Need figure is adjusted by the government each year as new data and statistics are published, the housing requirement will likely change further during the preparation of this new Local Plan. The current Adopted Local Plan (2014) provides a similar total housing requirement of 11,000 (550 per annum) as set out in the adopted Local Plan Policy LP4.

However, the specific housing requirements for Wisbech in the Emerging Local Plan alters dramatically from the Adopted Local Plan. The Adopted Local Plan identified 3,000+ houses (Adopted Policy LP4) in Wisbech within the FDC across the plan period. Whereas the total figure for Wisbech in the Emerging Local Plan falls dramatically to 514 homes (Draft Policy LP36). There is no explanation or clarification as to why this number for housing has significantly decreased for Wisbech when it has been identified as one of the four main market towns in the District. The level of housing growth identified should be commensurate with that identified previously to provide an appropriate sustainable level of growth for the District.

It is worth recognising that a key reason for the East Wisbech strategic allocation not being brought forward before, is that before this

Our client's site (land to the East of Stow land, Wisbech) forms part of the western section of the 'East Wisbech' strategic site allocation. Policy LP8 of the Adopted Local Plan indicatively allocates 900 dwellings across the entire East Wisbech strategic allocation. However, this important housing allocation has not been identified in the emerging Local Plan. It is considered that it should be included in order to provide for additional growth and flexibility to meet the ever-changing LHN for the District. The East Wisbech allocation is included within the current housing trajectory for the District, and as such, the Council is reliant on it to meet their housing land supply, which currently is 6.69 years. The latest FDC Five Year Housing Land Supply Report (September 2021) outlines that the delivery of the 900-unit East Wisbech Allocation (Policy LP8) within FDC will occur between 2025/26 and 2038/39. The report notes that the Council is in discussions with landowners/agents to enable smaller parcels

LP1: The Settlement Hierarchy and the Countryside

of the allocation to come forward, such as this site. The report also states that "smaller schemes could be delivered within five year period, therefore assume 50 dwellings in Year 5 are delivered." The latest housing trajectory indicates that the Council are confident that the East Wisbech site allocation will be delivered within the emerging plan period (i.e. to 2041). However, removing this allocation from the emerging Local Plan will have significant implications for the Council's ability to meet its housing requirements.

It is worth noting that the current approach to deliver the strategic allocation in smaller parcels differs from that used during the initial stages of the Adopted Local Plan period, where landowners and agents hoped to deliver the strategic allocation as a single large-scale proposal. However, this approach proved unmanageable, with conflicting interests from landowners across this expansive parcel of land. Consequently, this resulted in the strategic East Wisbech not being delivered within the current plan period.

Seagate Homes submitted a hybrid planning application in May 2022 on 'land to the East of Stow land' Wisbech (F/YR22/0844/O) for up to 325 dwellings in the western section of the East Wisbech strategic allocation (see enclosed Location plan). The submitted Masterplan shows that the scheme conforms with the principles of the East Wisbech Broad Concept Plan (BCP), with the configuration of the residential development, public open space, sports facilities, access points and drainage measures. The submitted Masterplan also shows a designated 'Community Hub' area in accordance with the BCP, which could deliver the possible community uses of a primary school, local centre, park, formal pitches and a potential orchard for the strategic allocation. The location of the 'Infrastructure Area' is strategically placed so that neighbouring sites will also be able to contribute land into this space to serve the allocation, as required by BCP. This approach outlined above enables our client's submitted proposal to be delivered on a standalone basis and allows other developments to come forward appropriately.

Subject to successfully obtaining planning permission, 'land to the East of Stow land' is deliverable within the initial stages of the new plan period. The significant delivery of in excess of a third of the total adopted allocation capacity will assist in delivering this strategic allocation within the forthcoming plan period to 2041.

It is understood that other developers with a land interest in the 'East Wisbech' strategic allocation are seeking to bring it forward.

SUMMARY

In view of this intention to deliver the site in the short term and in view of the Council's reliance on this site for their housing land supply, it is considered that the East of Wisbech site allocation should remain in the emerging Local Plan in order to provide an adequate level of housing growth in the most sustainable location as identified in the Local Plan.

Accordingly, Local Plan Policy LP2 should be amended to include the additional 900 dwellings to be delivered at Wisbech, bringing the total housing provision in Wisbech to 1,414 dwellings. In turn, Local Plan Policy LP36 should be updated as follows:

LP36.04 – East Wisbech – 900 dwellings

Furthermore, given that our client's 'land to the East of Stow land Wisbech' (F/YR22/0844/O) within the East Wisbech allocation is likely to be determined before the Emerging Local Plan becomes a material consideration. Therefore if this is the case, it should be added to Policy LP36 in respect of extant sites with residential planning permission

LP1: The Settlement Hierarchy and the Countryside

Title:

Position:

First Name: Nicola

Organisation:

Surname: Moore

Comment **Object**

I wish to object to the Emerging Local Plan proposed for the village of Tydd st Giles. As this plan is to be in force for the next 18 years I feel it is far too restrictive. The Local Plan being put forward will damage the growth and sustainability of the village. The outline shown in red covers only areas that have already been built on/developed and this will affect the village immensely as it will effectively cancel any future development. There has been mention that any further development should be in keeping with current housing in the village by mirroring housing on both sides of roads. Therefore the plan should automatically include the currently excluded areas of Church Lane and Newgate Road as well as any other areas where it is obvious that natural development would not over-expand the village. Church Lane and Newgate Road both already have properties and/or boundaries which could be argued classifies them better as infills and would therefore prevent development extending outwards of the last property in the village. In the opinion of many, due to the existing settlement on the East side and the current road structure already in place, Church Lane (West) should already be included in the Local Plan as it is in line with what was discussed at the recent Parish Council meeting and meets the Parish Council's very strict criteria. The Local Plan as it stands would also damage the possibility of the village being granted the much needed and supported store that was recently applied for. In short, I feel the Local Plan is flawed as it stands and there are some glaringly obvious solutions to making our village sustainable and allowing it to thrive during the next 18 years.

Title: Mr

Position:

First Name: John

Organisation: Maxey Grounds

Surname: Maxey

Comment **Object**

Part A – Small Villages B of Ponders Bridge, Turves and Tydd Gote have no entry in the policy section. If the view is that no specific allocation is intended I would suggest that these village still warrant so text describing the village and the reasoning why no allocation is intended and what scope there is for windfall within the adopted boundary

Part B – Very few settlements have land identified under the Frontage Infill provisions. I object both to the position that infill has to be frontage – there may be rounding off infill opportunities that relate well to the development boundary. I would also question whether infill should be restricted to 1 or 2 dwellings. Given allocations are for at least 5 units I would suggest infill ought to be up to 4 units. I would further suggest that because it is infilling or rounding off policy should permit this scale of infilling or rounding off outside but adjacent to the development boundary with suitable policy criteria applied. The concept of windfall infill/rounding off around the periphery of a settlement is a well understood concept , with such policies in many other local plans, and this policy could be amended to permit this without strategic damage to the plan to assist in the provision of the numbers envisaged as windfall, as such sites within boundaries are exhausted, and well as to assist in the supply of self build opportunities.

LP1: The Settlement Hierarchy and the Countryside

Title: Mr **Position:**

First Name: Colum **Organisation:** Cambridgeshire County Council

Surname: Fitzsimons

Comment **Support**

The Minerals and Waste Planning Authority welcomes reference to Minerals and Waste Local Plan (2021) (MWLP) in Part B – Settlement Boundaries.

Title: **Position:** Graduate Planner

First Name: George **Organisation:** Allison Homes Limited

Surname: Wilkinson

Comment **Support**

Policy LP1: Settlement Hierarchy

Allison Homes welcomes that provision is made within this policy to ensure that decisions on the location and scale of new development will be taken on the basis of a settlement hierarchy which is based upon the size and range of existing services and facilities.

For the reasons given in paragraph 6.1 of the draft plan, Allison Homes considers that this represents the most sustainable spatial strategy that the Council could adopt.

Allison Homes also supports the inclusion of Chatteris, March, Whittlesey, and Wisbech as Market Towns at the ‘top’ of the hierarchy to reflect the level of services and facilities that they have to offer.

Title: **Position:** Planning Administrator

First Name: Mercedes **Organisation:** Robert Doughty Consultancy

Surname: Golding

Comment **Support**

We support the inclusion of Whittlesey as a Market Town (the highest tier) within the settlement hierarchy. Whittlesey is one of the larger towns in the district. It is a focus for jobs and services and has capacity to grow to maintain the role.

The Policy would benefit from a discussion on the relative sizes and level of services provided in different Market Towns and other communities in the lower tier of the settlement hierarchy, to justify the level of growth attributed to each settlement. The role and importance of Whittlesey, which is the third largest town in the District, would logically lead to a higher growth target, both in absolute terms (to reflect the need identified in the Whittlesey Town Council Housing Needs Assessment) and as a proportion of overall growth apportioned to each settlement. Chatteris, the fourth largest settlement, has 50% more housing proposed growth than Whittlesey, despite being significantly smaller. The approach to setting differing growth targets is not explained or justified in any way.

LP1: The Settlement Hierarchy and the Countryside

Title: Mr **Position:**
First Name: Andy **Organisation:** The Abbey Group Cambridgeshire Ltd
Surname: Brand

Comment **Object**

LP1 Part B
We agree that the settlement boundary for March is appropriate albeit it appears to us that further new development could be accommodated within sustainable locations across the town as opposed to locating development in lower order settlements.

The strategy for allocating such large quantum’s of new housing within settlements below the Market Towns does not appear to be justified by sufficient evidence. The Market Towns within Fenland are sustainable locations to deliver additional housing growth given their proximity to public transport, employment and services. All of the villages within Fenland (whether defined as Large, Medium and Small within the draft Local Plan) have relatively poor access and so locations within and close to the Market Towns should be the preferred location for new housing and growth.

It is understood that part of the strategy for placing housing within the villages was the lack of delivery of development within the broad locations of growth which is a requirement within Policy LP7 of the current Local Plan. Such a requirement evidently restricted some locations being brought forward but this appears in part to be the result of the need for multiple landowners to co-operate. In hindsight the policy was always very unlikely to deliver the required growth.

The policy approach within LP2 is not sound as it is not justified in that insufficient evidence and analysis has been undertaken to consider why the previous (current Local Plan) policy approach has seemingly failed. In addition no analysis of the impacts of placing large amounts of housing within the villages has been presented.

It appears that all 4 of the Market Towns could accommodate additional housing growth and that a figure of 30% growth (of existing housing stock) across each Market Town would be a reasonable proxy. It has not been set out as to why Wisbech and Whittlesey in particular are not able to accommodate additional housing at larger scales than is currently proposed.

There are locations in March that are within the proposed settlement boundary but are not allocated – whilst these would count towards the windfall allowance they should (if deliverable) be included as new allocations in their own right.

The policy will also not be effective in delivering housing growth and it will also not deliver sustainable development as required by the NPPF. The plan could be made sound by reviewing the location of new housing growth across the District and by placing development in the most sustainable locations within the District.

The current distribution of housing is therefore flawed.

Title: Mr **Position:**
First Name: Andy **Organisation:** The Abbey Group Cambridgeshire Ltd
Surname: Brand

Comment **Support**

LP1 Part A
We agree that March should be one of the settlements at the top tier of the settlement hierarchy.

LP1: The Settlement Hierarchy and the Countryside

Title:	Mr	Position:	
First Name:	Dave	Organisation:	Tydd St Giles Parish Council
Surname:	Gibbs		

Comment	Object
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The Parish Council's Planning Committee considered the Draft Local Plan at their meeting on 13 October and have a number of concerns regarding the potential impact of the plan on life in Tydd St Giles.

The restrictive nature of the new proposed settlement boundary (Inset 25) 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. This is unacceptable. More than thirty dwellings have been built in the village during the last decade and the Parish Council considers this level of development to be wholly appropriate for the future. The only site identified in the Draft Plan is for seven dwellings currently nearing completion. Paragraph 6.7 of the Draft Plan addresses this issue succinctly, thus: "However, it is also recognised that smaller communities should benefit from an appropriate level of growth to ensure their long-term sustainability." A more flexible approach to the settlement boundary is required and the Parish Council is keen to work with officers to consider all options to facilitate this.

Policy LP63 states that "The village includes a primary school but otherwise has limited services." A more accurate description would be that this popular village includes a thriving primary school operating at near capacity, a well-supported church with its own choir and bell-ringing team, a large modern community centre, a popular pub/restaurant, a hairdresser, a major leisure business providing an 18-hole golf course, a swimming pool, a gym, a dance studio, a restaurant, a café, a bar, a sauna and steam room. These facilities offer a variety of employment opportunities for local people, as well as contract and supply chain opportunities for small businesses. The village currently lacks a village shop, however there are two possible solutions for this, one of which is the subject of a current planning application. A designation of medium village would be more appropriate for Tydd St Giles.

The members of the Parish Council were unclear about the precise meaning of Policy LP1 Part C, relating to the new hinterland development provisions. The definition of the settlement hinterland boundary refers to "an individual, isolated dwelling unconnected to any settlement." How would this be applied in the case of two or three dwellings together, for example a group of farm cottages? The frontage development criteria states that proposals "should not result in the physical and visual coalescence of settlements nor loss of or significant reduction in important gaps within or between settlements." How do we distinguish an important gap from an unimportant one?

In order to address the Council's concerns, members request that a senior planning officer visits Tydd St Giles to discuss the draft proposals in more detail and to consider site-specific issues within the general policies and the new hinterland provisions to provide the Parish Council with the clarity to advise residents and to fulfil its statutory obligation as a consultee on future applications.

7: Growth Strategy

Title:	Mr	Position:	Planning Officer
First Name:	Graham	Organisation:	Middle Level Commissioners
Surname:	Moore		
Comment	Neutral		
Neighbourhood Areas			

Comment - The designation should not unduly affect the Commissioners and associated Boards but please be advised that even though a neighbourhood area may have been designated, compliance with the provisions of the appropriate Acts and the relevant RMA's Byelaws would still be required.

Title:	Councillor	Position:	
First Name:	Ruth	Organisation:	Doddington Neighbourhood Plan Group
Surname:	Hopkins		
Comment	Neutral		
Paragraph 7.24			
The plan needs to identify where the current shortfall of jobs is – is this within a particular sector or it is on a geographic basis.			

Title:	Councillor	Position:	
First Name:	Ruth	Organisation:	Doddington Neighbourhood Plan Group
Surname:	Hopkins		
Comment	Object		
We do not consider that there is a sufficient emphasis on new housing being located within the Market Towns. We consider that each of the four Market Towns should accommodate around 30% of growth (compared with the existing level of housing for each Town). This would be a sound and sustainable approach as the Market Towns already contain employment, services and facilities akin with that level of growth.			

The Council’s approach within the draft Local Plan is contrary to the principles of sustainable development set out within the NPPF including paragraph 8 b) which requires that new development should:

support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.

The Group therefore fundamentally disagrees with the level of housing growth proposed within Doddington.

7: Growth Strategy

Title:		Position:	
First Name:	Alan	Organisation:	
Surname:	Bessant		
Comment	Object		
Point 7.17 (Page 27)			
Hanson Brick are no longer an employer in Whittlesey. This should read Forterra.			

Title:		Position:	
First Name:	John	Organisation:	
Surname:	Tuerena		
Comment	Object		
Para 7.4			
Fenland faces significant challenges to the delivery of new homes. Historic delivery rates of housing development failed to keep pace with the housing requirement. A Viability Assessment to inform the preparation of this Local Plan was commissioned. The assessment found that Fenland has lower house prices and land values than other authorities in the wider Cambridge sub-region and has relatively low development viability, particularly in locations in the north of the district.			
Development in the North of March is, and always has been one of sustainability and infrastructure overload. Sewage floods into homes and the transportation of sewage is a major factor and an issue that proves the system is already broken. Heavy Juggernauts and trucks smash the Fen roads and no matter how many repairs are actioned, within two years or sooner it all needs fixing again.			
Rail traffic through March-North has become heavier sense Kings Dye Bridge came into service. So we now have a 24/7 situation for holdups at March Stations junction.			
Doctors appointments are now harder to arrange, with fewer staff and longer waiting times. How can an expansion of population in this area be justified?			
The Mega sized school of Nealwade is failing students now. This type of school can't succeed and produce well rounded and viable members of society, because it is quality not quantity that counts.			

Title:	Mr and Mrs	Position:	
First Name:	J	Organisation:	
Surname:	Mair		
Comment	Support		
We support paragraph 5.13 that Fenland’s economy is diverse and of national importance, as a centre for agriculture, food processing industries, manufacturing, logistics and storage, engineering, public administration and other industries. We also support paragraph 7.11 that the Local Plan should take a flexible and facilitative approach to economic growth by allocating significantly more employment land. Policy LP15: Employment sets out Fenland’s ambition is to attract new businesses, jobs and opportunities whilst supporting growth of existing businesses and is supported.			

LP2: Spatial Strategy for the Location of Residential Development

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

Comment **Support**

Policy LP2: Spatial Strategy for the Location of Residential Development seeks to make provision for 10,525, new dwellings between April 2021 and March 2040.

Gladman support that the Draft Local Plan is directing growth to both urban and rural areas to meet the growing housing needs of the District. Ensuring sufficient growth is directed towards the urban and rural areas strikes a positive balance and helps ensure local communities have access to high quality affordable housing, as well as ensuring the provision and retention of services and facilities.

Title:		Position:	
First Name:	Stephen	Organisation:	
Surname:	Hodson		

Comment **Support**

Policy LP 2 Spatial Strategy for location of Residential Development . says it aims to " Distribute growth to settlements with aim to deliver " proportional growth " Yet the village of Coates ,a minor village ,has had 430 house allocations plus 4.78 Ha of industrial land on farmland east of Ben Burgess premises .The BB site is for agricultural clients I obtained the original Planning consent .It serves farming clients .It make no sense to deploy a large industrial estate in this location .All new industrial allocations should be to the west of Whittlesey central to avoid further traffic passing through the already congested A 605.

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

Comment **Neutral**

Whilst I support allocations being made by the plan rather than by Neighbourhood plans, how is it intended that additional allocations in a neighbourhood plan would be dealt with. The Neighbourhood Plan has to conform to the Local Plan. If the wording of this part of the policy remains as it is, does it imply that the LPA are content to see additional sites granted consent in addition to Local Plan allocations if they have local support via a Neighbourhood Plan designation. As such this would conform with an “at least” attitude to development numbers which I have advocated elsewhere.

LP2: Spatial Strategy for the Location of Residential Development

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

Comment Object

The text of para 7.5 says a 10% buffer on required numbers has been included in the spatial strategy. This is not the case.

Numbers required under the housing need are stated to be 10525. 10% buffer on this figure would be 11578. Proposed allocation is 10838 (stated to be 103% of requirement). Of these 1500 are windfall ie unidentified locations. Whilst it is accepted there is likely to be a supply from windfall, as infill sites within settlements are exhausted, numbers from this source are more difficult to produce. There are thus just 9338 identified units within the plan – hardly a 10% buffer on requirement. It is proposed that allocation numbers including the current windfall allowance should be 11578, to allow for non delivery of sites, and the policy phrased as “at least” this number so that it is not used as a barrier to specific applications making better use of land .

Para 7.14 notes that Wisbech is the largest of the market towns with (I would suggest) the best range of services and employment opportunities. It is allocated the greatest amount of employment land growth in policy LP3. I it thus considered incorrect to allocate the scale of housing growth (1287 -12%) compared to March (2746 – 26%) and Chatteris (1737 – 17%) . That level expansion of employment (42% of the allocation area)will require additional workers. Additional allocation should be made for Wisbech – inclusion of the existing East Wisbech allocation area now the subject of multiple applications would rectify this issue.

LP2: Spatial Strategy for the Location of Residential Development

Title: Graduate Planner

First Name: George **Organisation:** Allison Homes Limited

Surname: Wilkinson

Comment Object

Allison Homes welcomes that the draft Local Plan seeks to focus the majority of new residential development in and around Fenland's four market towns of Wisbech, March, Whittlesey and Chatteris to reflect the requirements of policy LP1. However, Allison Homes objects to the distribution of growth as set out within the table in Policy LP2 and the provision of only 12% of the housing requirement to Wisbech.

The adopted Local Plan (May 2014) rightly recognises that Wisbech is the largest settlement in Fenland and is an important destination for comparison retail and services for surrounding rural communities. To reflect this, it is allocated 31% of the proposed growth under the current adopted plan.

The proposed significant reduction in the proportion of homes allocated to the most sustainable settlement in Fenland is not considered to represent a sustainable distribution of housing growth and there has been no compelling case put forward by the Council to justify this change of position.

This issue can be remedied through the re-allocation of East Wisbech (strategic allocation) which is currently allocated under Policy LP8 of the adopted Local Plan. Significant work has been undertaken on this allocation by the District Council and key stakeholders resulting in the adoption of the detailed Broad Concept Plan (BCP) which has been endorsed by Fenland District Council.

The BCP demonstrates that the part of the site that is within the administrative boundary of Fenland can accommodate approximately 900 dwellings and compliments the emerging allocation in the Kings Lynn and West Norfolk (KLWN) Local Plan (Policy F3.1) for 550 dwellings. This plan has been submitted for examination and awaits examination in public. The BCP also identifies the necessary social infrastructure to support the strategic allocation and identifies how any on-site constraints can be suitably incorporated into any development proposals.

The endorsement of a BCP by both Fenland and Kings Lynn & West Norfolk provides greater certainty over the delivery of the site and allows developers to come forward with a greater degree of confidence. This is demonstrated through the recent submission of 2 screening requests, one of which has been followed up with a hybrid application for 325 dwellings (reference F/YR22/0844/O) and 3 other applications for Permission in Principle (references 22/0722/PIP, 22/0815/PIP, 22/0802/PIP) all of which have been granted.

Given the progress made to date on the strategic cross boundary allocation – BCP, planning applications and our own discussions with both Councils – we would query whether the draft local plan would at present comply with the NPPF requirements regarding the Duty to Cooperate; especially in light of KLWN's continued allocation of their proportion of the East Wisbech proposal. This failure to continue to allocate the Fenland portion of the strategic allocation is illogical and not in accordance with the proposed spatial strategy.

Allison Homes is in legal negotiations to secure an option on the site identified on the location plan submitted in support of this representation. Whilst most of the site is within the administrative boundary of Kings Lynn and West Norfolk, the western part of the site falls within the administrative boundary of Fenland. It is proposed that the site could provide for a residential led development and make provision for the delivery of social infrastructure proportionate to the site area in accordance with the adopted BCP.

In accordance with the NPPF, the site offers the opportunity to provide a deliverable site (being suitable, available and achievable) with a realistic prospect that housing could be delivered on the site in 5 years and could therefore contribute towards housing supply in both Fenland and Kings Lynn and West Norfolk.

LP2: Spatial Strategy for the Location of Residential Development

Title:		Position:	Planning Administrator
First Name:	Mercedes	Organisation:	Robert Doughty Consultancy
Surname:	Golding		

Comment Object

Paragraph 66 of the NPPF states Local Plans should include housing requirement figures for the designated Neighbourhood areas. These targets should set out the number of houses needed in each designated Neighbourhood Planning Area to provide a framework for the Neighbourhood Plan.

Policy LP2 sets out targets for each community and states the targets are met by commitments and allocations in the draft local plan. The implication being, certainly in cases where growth is being delivered by commitments, the target is set by the sum of units approved under extant planning permissions, rather than any assessment, or understanding of need.

The Local Plan, therefore, fails to allow for growth in a designated Neighbourhood Plan area and has failed to acknowledge the growth targets identified in the evidence supporting the Whittlesey Neighbourhood Plan. Although the District Council has had the opportunity to comment on the contents of the draft Neighbourhood Plan, no objection has been made to the growth aspirations or the preferred choice of location for new development. This results in unnecessary inconsistency and confusion between the two areas of Development Plan production. As the Neighbourhood Plan is at an advanced stage it will probably be “made” during the Local Plan process. The draft Local Plan should acknowledge the policies in the emerging Whittlesey Neighbourhood Plan to reduce unnecessary conflict between the two processes and reduce uncertainty for developers and the local community.

Paragraph 14 of the NPPF states the Presumption in Favour of residential development can be put to one side where there is a recent Neighbourhood Plan that contains policies and allocations to meet identified need. The draft Local Plan, by refusing to identify a target for each Neighbourhood, undermines the Neighbourhood Planning process, contrary to the Localism Agenda and the support and role for Neighbourhood Plans set out in paragraphs 29 and 30 of the NPPF.

Paragraph 61 of the NPPF states “to determine the minimum number of homes needed, strategic polices should be informed by a Local Housing needs assessment, conducted using the standard methodology.” (our italics) In effect the housing target should provide a lower, and not an upper, limit to growth. The approach adopted in Policy LP2 is that the housing target is a ceiling to growth and is, therefore, contrary to NPPF Paragraph 61.

LP2 is flawed, because it takes away the opportunity for communities to prepare Neighbourhood Plans and undermines the Neighbourhood Plan processes already underway in the area, reducing the role of a Neighbourhood Plan in a situation where the tilted balance is in play.

Furthermore, the approach to settlement targets is contrary to paragraph 61 of the NPPF because the housing targets are:

- 1) driven by existing commitments and allocations, rather than an assessment of need, and
- 2) treated as a ceiling to growth, and not a floor.

LP2: Spatial Strategy for the Location of Residential Development

Title:		Position:	Planning Administrator
First Name:	Mercedes	Organisation:	Robert Doughty Consultancy
Surname:	Golding		

Comment	Object
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The distribution of development across settlements is not justified.

The Growth target for Whittlesey specifically is very low, especially compared to the growth allocated to the other market towns, the role and function of the settlement and the ability to support growth.

Paragraph 61 of the NPPF states “to determine the minimum number of homes needed, strategic policies should be informed by a Local Housing Needs Assessment, conducted using the standard methodology.” In effect the housing target should provide a lower, and not an upper, limit to growth. The approach adopted in Policy LP2 is that the housing target is a ceiling to growth and is, therefore, contrary to NPPF Paragraph 61.

The local plan growth figures promoted are much lower than those that informed preparation of the Whittlesey Neighbourhood Plan (Set out in the Whittlesey Town Council Housing Needs Assessment prepared by AECOM). The Neighbourhood Plan is currently undergoing Examination and is expected to be “Made” before the Local Plan is adopted. The Neighbourhood Plan is supported by a Housing Needs Assessment prepared by AECOM. This assessment identified a range of housing targets for the Whittlesey Area, as follows:

- 127 DwPA based on the Adopted Local Plan
- 139 DwPA based on the Fenland SHMA
- 116 DwPA based on the DCLG housing projections
- 1,120 over the period 2017to 2031 based on past delivery. (80 a year).

In comparison, the growth promoted in the draft Local Plan of 886 dwellings for Whittlesey, with 430 in Coates and 12 in Eastrea over the period 2021 to 2040 translates to 70 dwellings per year, significantly less than all the above projections. Only the target based on past delivery is closer ,and even then the proposed target is lower than past delivery.

Arguably, the “past delivery rate” represents a failure to meet the demand for growth in the area and efforts should be taken to address the shortfall, not to seek to impose a cap on development. The Housing targets promoted in the Draft Local Plan represent a limit on development in the Whittlesey Neighbourhood Plan area, including Eastrea and Coates, and is a significant cap on the ability to meet demand. The imposition of a cap on development has not been acknowledged or justified either in the draft Local Plan or in the supporting evidence and should therefore be removed.

Furthermore, the approach to settlement targets is contrary to paragraph 61 of the NPPF because the housing targets are:

- 1) driven by existing commitments and allocations, rather than an assessment of need, and
- 2) treated as a ceiling to growth, and not a floor.

The target for growth in Whittlesey should be reconsidered in light of the evidence set out in the Whittlesey Town Council Housing Market Assessment.

There is an inconsistency of setting targets for Whittlesey, which despite being the third largest settlement and significantly larger than Chatteris, the fourth largest settlement, is only allocated two-thirds the level of growth in new housing

LP2: Spatial Strategy for the Location of Residential Development

Title:		Position:	Planning Administrator
First Name:	Mercedes	Organisation:	Robert Doughty Consultancy
Surname:	Golding		
Comment	Object		
Neighbourhood Planning			

Paragraph 66 of the NPPF requires Local Plans should include housing requirement figures for the designated Neighbourhood areas. These targets should set out the number of houses needed in each designated Neighbourhood Planning Area to provide a framework for the Neighbourhood Plan.

Policy LP2 sets out targets for each community and confirms that the targets are met by commitments and allocations in the draft local plan. The implication being, certainly in cases where growth is being delivered by commitments, that the target is set by the sum of units approved under extant planning permissions, rather than any assessment or understanding of need.

The Local Plan, therefore, fails to allow for growth to meet identified needs in a designated area (such as the Whittlesey Neighbourhood Plan Area, which includes the settlements of Eastrea and Coates) and has failed to acknowledge the growth targets identified in the Whittlesey Town Council Housing Needs Assessment prepared to support the Neighbourhood Plan. Although the District Council has had the opportunity to comment on the contents of the draft Neighbourhood Plan, no objection has been made. This results in unnecessary inconsistency and confusion between the two areas of Development Plan production. As the Neighbourhood Plan is at an advanced stage, it will probably be “Made” during the Local Plan process. The draft Local Plan should acknowledge the policies in the emerging Neighbourhood Plan to reduce unnecessary conflict between the two processes and reduce uncertainty for developers and the local community.

Paragraph 14 of the NPPF sets out the circumstances where the presumption in favour of residential development can be put to one side if the development is not in conformity with the Neighbourhood Plan. This includes where there is a recent Neighbourhood Plan that contains policies and allocations to meet identified need. The draft Local Plan, by refusing to identify a target for each community, above existing commitments and allocations, undermines the Neighbourhood Planning process because there would be no scope for new allocations, contrary to the Localism Agenda and the support and role for Neighbourhood Plans set out in paragraphs 29 and 30 of the NPPF.

Paragraph 61 of the NPPF states, “to determine the minimum number of homes needed, strategic policies should be informed by a Local Housing needs assessment, conducted using the standard methodology.” In effect the housing target should provide a lower, and not an upper, limit to growth. The approach adopted in Policy LP2 is that the housing target is a ceiling to growth and is, therefore, contrary to NPPF Paragraph 61.

LP2 is flawed, because it takes away the opportunity for communities to prepare Neighbourhood Plans and undermines the Neighbourhood Plan processes already underway in the area and undermines the role of Neighbourhood Plans in the decision making process.

Furthermore, the approach to settlement targets is contrary to paragraph 61 of the NPPF because the housing targets are:

- 1) driven by existing commitments and allocations, rather than an assessment of need, and
 - 2) treated as a ceiling to growth, and not a floor.
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LP2: Spatial Strategy for the Location of Residential Development

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

Comment	Object
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LP2 – Spatial Strategy for the location of residential development

Policy is unsound as it is not fully justified

Housing needs

Paragraph 5.4 of the supporting text notes that the housing needs for Fenland using the standard method is 556 dwellings per annum (dpa) and a total need over the plan period of 10,525 homes. Whilst the HBF concurs with this assessment it is important that the Council recognise that this a minimum figure within the policy and provide an annualised figure alongside the total requirement for the plan period. This is necessary to ensure the policy provides the necessary clarity as to the annual housing requirement and that the Council are not using a stepped trajectory.

It is also necessary to recognise that there will be circumstances where Councils will need to plan for a higher number of new homes than established using the standard method. Paragraph 61 indicates that one such circumstance in where neighbouring authorities cannot meet their own needs in full. Whilst we are not aware of an unmet housing need in neighbouring areas it will be important for the Council to provide the necessary evidence that this is the case. As set out above we could find no evidence relating to the duty to co-operate and the cross-border issues relevant to Fenland and this matter should, be addressed in that evidence.

Another concern that indicates that the Council should be seeking to deliver more new homes than the standard method suggests is the need for more affordable homes with paragraph 2a-024 of Planning Practice Guidance (PPG) stating that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. The Council note at paragraph 13.5 of the local plan that the need for affordable housing is around 289 dwellings per annum, over 50% of the total housing need in Fenland. However, as the Council note the viability evidence concludes that residential development is not able to deliver affordable housing above 20% in the southern part of the district and 10% in north. As such there will be a significant shortfall between the delivery and need for affordable housing.

However, in preparing the local plan it is notable that the Council did not consider options for delivering more growth than that established through the standard method. The Issues and Options consultation and the Sustainability Appraisal look solely look at the distribution of housing across the borough but not whether a higher housing requirement is necessary in relation to the delivery of more affordable housing. Such an approach would be consistent with national policy and as such is a reasonable alternative that the Council should have considered given the gap between affordable housing needs and expected delivery. This is clear failing of the SA on this issue and the Council should consider such an option before submitting the local plan for examination.

Given the shortfalls in affordable housing delivery the Council should consider allocating additional sites in the local plan in order to increase the supply of affordable housing. Not only will this boost the supply of affordable housing but also potential ensure more housing supply in the second half of the plan period.

Housing supply

The Council expect to deliver 10,828 new homes over the plan period, around a 3% buffer in its housing supply. Whilst this is a low overall buffer it would appear that a significant proportion of this supply will be delivered in the first half of the plan period. This should ensure that needs are met in full in the short and medium term. However, as can be seen in appendix 1 of these representations, from 2029/30 onwards the Council will not be able to show a five-year land supply. Whilst the Council are required to review the local plan in five years' time, we would suggest that this is too late given the supply position faced by the Council in the second half of this plan. Ideally the Council should seek to identify sites that would deliver more homes from 2028/29 but at the very least we would suggest that the Council commit in this local plan to preparing a new local plan for adoption by 2028/29.

LP2: Spatial Strategy for the Location of Residential Development

Supply from sites of less than one hectare

What is not clear from the local plan and its supporting evidence is whether the Council will address the requirement in paragraph 69 of the NPPF that 10% of all homes come forward on sites of less than one hectare. In considering this key requirement the Council should also note that these should be on sites identified in the local plan or the brownfield register. As such the Council cannot meet this requirement through windfall sites which do not provide any of the benefits of being specifically identified for development.

The HBF has undertaken extensive consultation with its small developer members and one of the chief obstacles for small developers is that funding is extremely difficult to secure with a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or else the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have.

If the Council are to ensure there is a wide variety of SME house builders operating in its administrative area, and the benefits it brings to the speed of delivery and variety of homes, it must ensure that as a minimum 10% of homes come forward on small sites. We would suggest that the Council actively works with smaller developers to ensure such sites are allocated recognising the importance of this element of the house building industry.

Deliverability and viability

In order for a plan to be found sound the plan must be deliverable. A key part of this test as set out in paragraph 34 of the NPPF is that the policies in the plan should not set burdens on development that undermine the deliverability of the plan. What is evident from the Council's Viability Assessment (VA) is that viability across Fenland is challenging. The Council have recognised this, and we welcome the approach taken in LP12 that varies policy requirements for affordable housing based on the location of a development.

However, we are concerned that some of the costs included in the viability assessment may under estimate the cost to the developer. In particular we are concerned that the cost attached to the requirement to deliver a 10% net gain is too low. The VA uses the average cost from the Government's Impact Assessment published in 2019 on the central assessment that would see 75% of net gain delivered on site. Our concern with this assessment is that it is an average assessment. Whilst some sites might be much lower, such as those in an urban area with very little existing biodiversity but equally they could be significantly higher on green field sites where a 10% gain is much harder to achieve.

In some cases, this could lead to a reduction in the developable area of a site or the need to deliver net gains off site. The Government's evidence indicates that for those sites delivering more offsite (scenario C in the Impact Assessment) the cost is likely to be in the region of £60,000 per hectare. In addition, credits for offsite delivery in the Impact Assessment were valued at £11,000 per unit but the Impact Assessment does indicate that these could be in the range of between £15,000 and £25,000 per unit. A recent study by the Land Trust funded by the HBF and Land Promoters and Developers Federation (LPDF) found that majority of sites will require more than 50% of BNG to be delivered off-site. As such the costs are likely to be higher for most sites than that indicated in the impact assessment. It therefore cannot be assumed as the latest Viability Note suggests at paragraph 33 that provision will be on site for green field sites.

We would therefore suggest that further consideration is given to the impact of biodiversity net gain on the deliverability and viability of sites in Fenland. We would suggest that further sensitivity testing is required with regard to BNG and the higher costs that may face some development than is currently considered in the VA.

We note that the Council has undertaken a brief assessment with regard to First Homes and concluded that this will be unlikely to impact on viability. However, this assessment is based on such homes being treated as other affordable homes that would be built for a housing association. In reality these will be built and sold by the developer as a market unit and as such should be considered as such in the viability assessment with the same costs and profit assumptions.

Finally, the cost of Electric Vehicle Charging Points (EVCPs) has been considered in the viability note (PE02-4). Whilst

LP2: Spatial Strategy for the Location of Residential Development

we would agree with the costs relating to the installation of charging points no consideration has been given to the potential costs to upgrade substations and other infrastructure to support the increased demand for electricity. This will be required alongside the growth in charging points to ensure that there is sufficient supply as ownership of electric vehicles grows.

The Regulations do, however, include a cost cap of £3,600 for the average cost of installation and allow for other exceptions. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point installation. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades, which will be costly for the developer. Some costs would also fall on the distribution network operator.

Whilst on their own we recognise that these adjustments may not impact on viability and deliverability, in combination with others costs it may have an impact and should be fully assessed.

Recommendations

In order to ensure the policy is sound the Council should:

- Amend the first paragraph of LP2 to include an annual housing requirement and state that the requirement is a minimum;
 - Provide evidence as to discussions on housing need with neighbouring areas and whether there are unmet housing needs to be considered should be provided by the Council;
 - Consider increasing the supply of housing in order to better meet the needs for affordable housing in Fenland;
 - Submit evidence as to whether the local plan addresses paragraph 69 of the NPPF and if not allocate sufficient sites to ensure at least 10% of homes will be delivered on identified sites of less than one hectare.
 - Consider the allocation of further sites to support delivery in the second half of the plan period.
 - Include a review policy looking to adopt a new plan within five years of the adoption of this plan should it be found sound.
 - Amend the viability evidence to include the higher costs identified.
-

LP2: Spatial Strategy for the Location of Residential Development

Title:		Position:	
First Name:	Andrew	Organisation:	Pegasus Group
Surname:	Hodgson		

Comment	Object
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These representations are submitted by Pegasus Group on behalf of Seagate Homes Ltd who has land interests at East Wisbech.

Seagate Homes have a hybrid planning application submitted on 'land to the East of Stow land, Wisbech' (F/YR22/0844/O) for up to 325 dwellings. This land forms part of the East Wisbech strategic allocation (Policy LP8) for residential development in the adopted Fenland Local Plan 2014.

The East Wisbech allocation, similar to many other strategic allocations, has remained undeveloped; however, this important allocation is proposed for removal from the Emerging Local Plan. These representations justify the need to re-include this strategic allocation in this sustainable location.

Our client fully supports Draft Local Plan Policy LP1. The Draft Policy outlines that growth should be focused on the four market towns (including Wisbech), where the majority of the District's new housing, employment growth, retail growth and wider service provision should take place.

Notwithstanding this, it is considered that the level of housing development proposed for Wisbech in the Local draft Plan will not meet the needs of present and future generations in accordance with the 'social objective' of NPPF Paragraph 7 (2021). In order to meet this objective, it is considered that all opportunities should be taken to provide a flexible housing delivery strategy to ensure an adequate provision of housing is maintained in the most sustainable locations.

The District's housing requirement for this Draft Local Plan consists of 517 dwellings for the period 1st April 2021 to 31st March 2022 (1 year) plus 556 dwellings in each year from 1st April 2022 to 31st March 2040 (18 years), thereby providing a total requirement of 10,525 dwellings from 1st April 2021 to 31st March 2040. The draft Local Plan outlines that since the Local Housing Need figure is adjusted by the government each year as new data and statistics are published, the housing requirement will likely change further during the preparation of this new Local Plan. The current Adopted Local Plan (2014) provides a similar total housing requirement of 11,000 (550 per annum) as set out in the adopted Local Plan Policy LP4.

However, the specific housing requirements for Wisbech in the Emerging Local Plan alters dramatically from the Adopted Local Plan. The Adopted Local Plan identified 3,000+ houses (Adopted Policy LP4) in Wisbech within the FDC across the plan period. Whereas the total figure for Wisbech in the Emerging Local Plan falls dramatically to 514 homes (Draft Policy LP36). There is no explanation or clarification as to why this number for housing has significantly decreased for Wisbech when it has been identified as one of the four main market towns in the District. The level of housing growth identified should be commensurate with that identified previously to provide an appropriate sustainable level of growth for the District.

It is worth recognising that a key reason for the East Wisbech strategic allocation not being brought forward before, is that before this

Our client's site (land to the East of Stow land, Wisbech) forms part of the western section of the 'East Wisbech' strategic site allocation. Policy LP8 of the Adopted Local Plan indicatively allocates 900 dwellings across the entire East Wisbech strategic allocation. However, this important housing allocation has not been identified in the emerging Local Plan. It is considered that it should be included in order to provide for additional growth and flexibility to meet the ever-changing LHN for the District. The East Wisbech allocation is included within the current housing trajectory for the District, and as such, the Council is reliant on it to meet their housing land supply, which currently is 6.69 years. The latest FDC Five Year Housing Land Supply Report (September 2021) outlines that the delivery of the 900-unit East Wisbech Allocation (Policy LP8) within FDC will occur between 2025/26 and 2038/39. The report notes that the Council is in discussions with landowners/agents to enable smaller parcels

LP2: Spatial Strategy for the Location of Residential Development

of the allocation to come forward, such as this site. The report also states that "smaller schemes could be delivered within five year period, therefore assume 50 dwellings in Year 5 are delivered." The latest housing trajectory indicates that the Council are confident that the East Wisbech site allocation will be delivered within the emerging plan period (i.e. to 2041). However, removing this allocation from the emerging Local Plan will have significant implications for the Council's ability to meet its housing requirements.

It is worth noting that the current approach to deliver the strategic allocation in smaller parcels differs from that used during the initial stages of the Adopted Local Plan period, where landowners and agents hoped to deliver the strategic allocation as a single large-scale proposal. However, this approach proved unmanageable, with conflicting interests from landowners across this expansive parcel of land. Consequently, this resulted in the strategic East Wisbech not being delivered within the current plan period.

Seagate Homes submitted a hybrid planning application in May 2022 on 'land to the East of Stow land' Wisbech (F/YR22/0844/O) for up to 325 dwellings in the western section of the East Wisbech strategic allocation (see enclosed Location plan). The submitted Masterplan shows that the scheme conforms with the principles of the East Wisbech Broad Concept Plan (BCP), with the configuration of the residential development, public open space, sports facilities, access points and drainage measures. The submitted Masterplan also shows a designated 'Community Hub' area in accordance with the BCP, which could deliver the possible community uses of a primary school, local centre, park, formal pitches and a potential orchard for the strategic allocation. The location of the 'Infrastructure Area' is strategically placed so that neighbouring sites will also be able to contribute land into this space to serve the allocation, as required by BCP. This approach outlined above enables our client's submitted proposal to be delivered on a standalone basis and allows other developments to come forward appropriately.

Subject to successfully obtaining planning permission, 'land to the East of Stow land' is deliverable within the initial stages of the new plan period. The significant delivery of in excess of a third of the total adopted allocation capacity will assist in delivering this strategic allocation within the forthcoming plan period to 2041.

It is understood that other developers with a land interest in the 'East Wisbech' strategic allocation are seeking to bring it forward.

SUMMARY

In view of this intention to deliver the site in the short term and in view of the Council's reliance on this site for their housing land supply, it is considered that the East of Wisbech site allocation should remain in the emerging Local Plan in order to provide an adequate level of housing growth in the most sustainable location as identified in the Local Plan.

Accordingly, Local Plan Policy LP2 should be amended to include the additional 900 dwellings to be delivered at Wisbech, bringing the total housing provision in Wisbech to 1,414 dwellings. In turn, Local Plan Policy LP36 should be updated as follows:

LP36.04 – East Wisbech – 900 dwellings

Furthermore, given that our client's 'land to the East of Stow land Wisbech' (F/YR22/0844/O) within the East Wisbech allocation is likely to be determined before the Emerging Local Plan becomes a material consideration. Therefore if this is the case, it should be added to Policy LP36 in respect of extant sites with residential planning permission

LP2: Spatial Strategy for the Location of Residential Development

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

Comment Object

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

Policy LP2 identifies a housing target of 10,525 additional dwellings between 2021 and 2040. The housing requirement consists of 517 dwellings for the period 01 April 2021 to 31 March 2022 (1 year) and 556 dwellings per annum from 01 April 2022 to 31 March 2040 (18 years). The focus for growth is the four market towns.

In summary, the preferred housing target for draft FLP does not consider or assess any upward adjustments to address affordable housing needs, as required by national guidance. The past delivery of affordable housing has been poor, there is a high need for affordable housing, and for viability reasons the affordable housing target on the northern part of Fenland is set at 10%. All these factors indicate that the housing requirement should be increased to address affordable housing needs.

The difference between the housing supply (10,828 dwellings) and the housing requirement (10,525 dwellings) is only 303 dwellings, which represents very limited flexibility in the housing supply to take into account potential delays to housing delivery at some of the larger strategic allocations.

The market towns contain a good range of services and facilities and employment opportunities, and are accessible by sustainable modes of transport, and as such these settlements are suitable and sustainable locations for growth. Foster Property Developments is promoting land in March and Wisbech.

Housing Requirement

Paragraphs 5.2 to 5.6 of draft FLP explain the approach to the housing requirement for Policy LP2. The housing target is 10,525 additional dwellings between 2021 and 2040, which is the figure derived from the standard method for calculating local housing needs in national policy and guidance. The housing requirement in Policy LP2 and its supporting text including in Paragraphs 5.2 to 5.6 does not consider or assess any factors that might lead to an adjustment to the housing requirement, including to address affordable housing needs. As set out below, this approach is inconsistent with national policy.

The draft FLP will need to be consistent with national policy and guidance on meeting housing needs. Paragraph 60 of the NPPF confirms the Government's objective to significantly boost the supply of housing, and to achieve this by ensuring that a sufficient amount and variety of land for housing is identified. Paragraph 61 expects the standard method to be used to determine the minimum number of houses needed. Paragraph 62 expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need. Section Id.2a of the Planning Practice Guidance explains how housing and economic needs assessments should be undertaken, including how to calculate local housing needs using the standard method. Paragraph 010 of Id.2a makes it clear that the standard method is the minimum starting point for determining local housing needs. Paragraph 024 of Id.2a explains how the need for affordable housing is calculated, and it is suggested that the overall housing target should be increased where it could help deliver the required number of affordable homes.

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). Therefore, meeting affordable housing needs and increasing the supply of affordable housing are important issues for Fenland District Council, and are matters that draft FLP should seek to address. However, the housing requirement in Policy LP2 does not include any specific action to address affordable housing needs despite evidence that positive policy support is required.

Paragraphs 13.5 to 13.26 of draft FLP provides information on affordable housing, including current and future affordable housing needs during the plan period and the affordable housing policy requirements. As set out in

LP2: Spatial Strategy for the Location of Residential Development

Paragraph 13.5, the total number of households on the housing register is 1,482. The total annual affordable housing need is 289 dwellings (as derived from the Cambridgeshire and West Suffolk Housing Needs of Specific Groups Report prepared by GL Hearn in October 2021 – see Table 38). The total affordable housing need for the plan period 2021 to 2040 would be 5,491 affordable dwellings. The need for 289 affordable rented dwellings per annum, or a total of 5,491 affordable dwellings during the plan period, represents more than half of the proposed housing requirement for draft FLP (of 10,525 dwellings). The scale of the affordable housing needed in Fenland should have triggered an assessment as to whether an adjustment to the overall housing requirement should be made, as required by Paragraph 024 of Id.2a of the Planning Practice Guidance.

As explained in Paragraphs 13.13 and 13.14, and as set out in Policy LP12 (Meeting Housing Needs), the affordable housing requirements for sites of 10 or more dwellings are as follows: 20% affordable housing from greenfield sites in the south of the District; and 10% affordable housing from all brownfield sites and from greenfield sites in the north of the District. These affordable housing requirements have been derived from evidence of development viability at different types of site and locations. The proportion of affordable housing sought from qualifying developments in Fenland is quite low in comparison to neighbouring areas, and it will take longer for the identified affordable housing needs of the District to be met. The option of increasing the housing requirement in draft FLP, and making additional housing allocations, in order to increase the number of qualifying sites and the supply of affordable housing should have been considered and assessed. If development is to remain viable it would not be possible to increase the proportion of affordable housing from qualifying sites.

The latest Fenland Monitoring Report for 2020/21 includes affordable housing completion data from 2002/03 to 2020/21 – see Table 7. It is noted that the proportion of affordable housing delivered in most monitoring years is quite low and is typically less than the proposed policy requirement of 20% and for some monitoring years is below the proposed minimum policy requirement of 10%. It is also noted that past annual affordable housing delivery rates have been well below the rates currently needed at 289 dwellings per annum. The highest number of affordable dwellings delivered in recent monitoring years was 165 dwellings in 2014/15. The average number of affordable dwellings delivered between 2002/03 and 2020/21 is 65 dwellings per year. It is clear that past delivery of affordable housing has been poor and has been nowhere near the levels required to meet current affordable housing policy requirements or annual affordable housing needs. There is no assessment of past affordable housing delivery rates to determine the housing requirement in Policy LP2. It is not explained in draft FLP how annual affordable housing delivery rates would be increased to meet current needs. It is considered that the housing requirement in Policy LP2 should be adjusted to increase the supply of affordable housing and to increase annual affordable housing delivery rates above past levels.

It is requested that an appropriate upward adjustment is made to the housing requirement in Policy LP2, so that identified affordable housing needs are met in full during the plan period.

Housing Supply Flexibility

The difference between the housing supply (10,828 dwellings) and the housing requirement (10,525 dwellings) is only 303 dwellings, which represents very limited flexibility in the housing supply to take into account potential delays to housing delivery at some of the larger strategic allocations. As set out in the representations to Table 10: Housing Trajectory, it appears that overall annual housing delivery rates and delivery rates for some strategic allocations are predicted to be substantially above previous rates. For example, it is predicted that annual delivery rates would exceed more than 1,000 dwellings for some years i.e. 2022/23, 2026/27, 2027/28 and 2028/29. It is predicted that Allocation Ref. LP39.01 (Land north of Knight's End Road and East of the A141) would deliver 250 dwellings per annum in 2035/36 and 2036/37. There is no evidence provided to justify these predictions, and no actions are identified in draft FLP to explain how delivery rates would be increased substantially above existing levels. As highlighted in the analysis contained in the Letwin Review of Build Out Rates, a high number of allocations are needed to increase build out rates. It is unlikely that the proposed allocations in draft FLP will be sufficient to meet the housing requirement identified in Policy LP2 because the predicted housing delivery rates are unrealistic, and there is no flexibility in the housing land supply to deal with any delays to delivery at some strategic allocations. As set out in the representations to Part D of draft FLP, it is requested that additional allocations are made for a variety of reasons, including to provide greater flexibility to the housing land supply and to increase annual housing delivery rates.

It is requested that the housing land supply is increased to provide greater flexibility in order to ensure that the

LP2: Spatial Strategy for the Location of Residential Development

housing requirement is met during the plan period, to include an updated housing trajectory with realistic housing delivery rates (see representations to Table 10) and additional allocations in March, Wisbech and Leverington (see representations to Part D).

Requested Changes

It is requested that an appropriate upward adjustment is made to the housing requirement in Policy LP2, so that identified affordable housing needs are met in full during the plan period.

It is requested that the housing land supply is increased to provide greater flexibility in order to ensure that the housing requirement is met during the plan period, to include an updated housing trajectory with realistic housing delivery rates (see representations to Table 10) and additional allocations in March, Wisbech and Leverington (see representations to Part D).

Title:	Mrs	Position:
First Name:	V	Organisation:
Surname:	Melvin	

Comment	Object
Under "Limited Growth Villages" - I would like to stay the way we are as a village, no more growing. I moved out this way to be in the countryside and open spaces.	
Paragraph 3.3.10 "Steers new development" - Building 215 homes is not really steering away to larger places. How can a slip road or a dirt track at the moment, where it will be same way in, same way out as "Best Access!!" It is farmers filed, you would have to have a car to travel or a fair walk to the bus stop, this will not be reducing the need to travel!	
Paragraph 3.3.11 "Government Policy" - The countryside will no longer be recognised as "Intrinsic Character and Beauty" if you build in and on open spaces. There are at least 5 homes which look out onto open space, which in away could be classed as isolated where there will be no view only homes! We all moved this way for the open space and views.	
Under 3.4 - "Housing Growth and Meeting Housing Need" - Not in any of the paragraphs (3.4.1 to 3.4.7) is it mentioned about building - More Schools, More Doctors / Dental Surgeries, Better Bus Transport, More Job Opportunities, better road conditions, all anyone is interested in is targets, figures and the years they have / want it to happen!	

LP2: Spatial Strategy for the Location of Residential Development

Title:		Position:	Managing Director
First Name:	Andy	Organisation:	ASP Planning and Development Consult
Surname:	Stevens		

Comment	Object
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The draft local plan proposals represent a significantly different approach to Wisbech than in the adopted local plan, for which there is little or no explanation The site forms part of a wider strategic urban extension (SUE) for around 1450 homes, as shown in the East Wisbech Broad Concept Plan Main Diagram. This proposed large scale, cross-border proposal has failed to come forward despite the best intentions of the council in seeking cooperation between landowners and others. It is also the case that the wider infrastructure package required to service the development is unachievable. In this context the development of the land is neither achievable nor deliverable. The decision not to carry forward the development potential of the land in a comprehensive fashion is, in those circumstances, the correct one. There is no evidence, however, that the council has considered the potential to deliver a lesser amount of development for land to the east of Wisbech.

The removal of the SUE from the local plan will have an effect on the medium to longer term delivery of houses in the District, given that the lead-in time to larger development generally puts them later in the local plan housing trajectory, and in the case of Wisbech it was anticipated the site would begin to deliver new dwellings in 2024 and beyond. The status of the present local plan, therefore, would be an increasing difficulty in meeting supply requirements and a shortfall of housing later in the plan period. For the new local plan, therefore, there is the challenge of meeting the required delivery targets from an alternative range of sites, in appropriate locations.

The overall strategy of the new local plan is similar to that of the present adopted version, in defining a settlement hierarchy that ranks settlements according to their size and range of existing services and facilities. We note the Fenland Survey of Existing Services and Facilities Study (May 2022), which identifies which settlements should be included in the settlement hierarchy and at what tier they sit, and we support this methodology.

LP2: Spatial Strategy for the Location of Residential Development

Title:		Position:	
First Name:	Natalie	Organisation:	Huntingdonshire District Council
Surname:	Elworthy		

Comment Support

Huntingdonshire District Council (HDC) supports the strategic priorities identified in Table 1 and their acknowledgement of the relationship between the Local Plan and the strategic priorities established in the NPPF. Similarly, the Overarching Issues identified on pages 16- 17 are supported as representing a realistic picture of the core challenges facing Fenland up to 2040. In particular, the recognition of the need for resilience to climate change is welcomed.

The intention to meet in full the local housing need figure as calculated through the standard method is supported. It is recognised that as a result of this no request is being made to HDC under the duty to cooperate to provide any assistance in meeting the housing needs of Fenland within this district. It is noted that whilst this currently equates to provision of an additional 10,525 new homes the proposed submission version of the Local Plan will reflect the most up-to-date number at that time. The uplift to 10,828 new homes, as set out in policy LP2 Spatial Strategy for the Location of Residential Development and explained in paragraph 7.5, to allow for a small buffer in the context of the housing delivery challenges previously faced in Fenland is supported. Fenland DC are urged to carefully consider the inclusion of an allowance of 1,500 new homes (14% of the total) in a windfall category in terms of compliance with NPPF paragraph 71 and to ensure compelling evidence is made available that this will form a reliable source of supply and that this is kept up to date for submission.

The current levels of traffic and unreliability of journey times on the A141 is an issue that has significant impacts across the Fenland and Huntingdonshire area and is worsened by the mixture of heavy goods vehicles and car journeys. Whilst recognising that development proposals align with the proposed settlement hierarchy the high concentration of proposed residential and employment growth in Fenland situated in Chatteris, Doddington, Wimblington and March along the A141 corridor is of significant concern to HDC. Fenland DC is strongly encouraged to engage collaboratively with HDC, the Cambridgeshire and Peterborough Combined Authority and Cambridgeshire County Council to promote improvements to the A141 which both enhance its vehicular capacity and provide local active travel alternatives for shorter journeys and public transport options between larger residential and employment centres.

LP2: Spatial Strategy for the Location of Residential Development

Title:		Position:	Senior Planner
First Name:	Reiss	Organisation:	Marrons Planning
Surname:	Sadler		

Comment	Object
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Policy LP2 applies the Government’s Standard Method to calculate Local Housing Need, as advocated by the Framework and supporting national guidance. The following comments are made:

The Local Housing Need has been calculated by applying Fenland District Council’s 2020 affordability ratio (published March 2021) of 7.32 to the first year of the Plan period (2021/22) and applying the 2021 affordability ratio (published March 2022) of 8.91 for the remaining Plan period (2022/23 to 2039/402). There is no justification for this provided in the Plan and this approach is not supported by the Framework or supporting national guidance; national guidance is clear that “the most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used”. As such, it is suggested that the minimum Local Housing Need for the Fenland Local Plan period 2021 to 2040 should be 19 years multiplied by 556 dwellings, equating to 10,564 dwellings.

Further, the Framework and supporting national guidance are clear that the Standard Method calculates a “minimum number of homes needed” (emphasis added), and provides some examples of where an uplift in the Local Housing Need figure derived from the Standard Method is likely to be appropriate.

This includes strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; this is particularly relevant to Chatteris where planned development south of the town includes a Southern Bypass between Ireton’s Way and London Road. HLM also consider that the proposed aspiration to significantly boost employment growth and job creation in Chatteris with the two ‘broad locations’ is likely to change economic circumstances in the town and drive an increase in the demand for homes from employees.

As such, it is recommended the Council consider an uplift (5%) be applied to the Local Housing Need derived from the Standard Method to take account of strategic infrastructure improvements and planned significant employment growth at Chatteris. A 5% uplift would equate to circa 500 dwellings.

HLM also raise concerns with the lack of an appropriate buffer incorporated into the Housing Requirement calculation. The incorporation of a buffer allows for a level of assurance and flexibility for the Plan period, which is particularly important in the context of a District with a rising affordability ratio , a marginal and consistent low Housing Delivery Test measurement (including most recently of 95% which avoided any consequences by just 1%) , and where there are clear development viability challenges

Although paragraph 7.5 refers to a 10% buffer, Policy LP2 only includes a buffer of circa 3%

The incorporation of an appropriate buffer would account for the inevitable expiry of commitments included in the supply, of which there is a significant number in Fenland District (4,230 dwellings) with no account taken of lapse rates in the calculation of available housing supply to date.

The Local Plans Expert Group recommended to Government in 2016 that a 20% uplift to housing requirement should be applied to enable a Local Plan to be considered resilient , with the introduction of the Standard Method not invalidating nor inherently taking account of this advice.

As such, it is contended that a 20% buffer should be applied to the Local Housing Need calculation to provide flexibility and resilience, and to limit the likelihood of the Council being unable to demonstrate a positive Five Year Housing Land Supply position during the Plan period to 2040. A 20% buffer equates to an additional 2,324 dwellings, increasing the Housing Requirement to 13,944 dwellings.

The difference in calculation of Housing Requirement for the Fenland Local Plan is illustrated below in Table 1.

LP2: Spatial Strategy for the Location of Residential Development

Table 1 – Housing Requirement Calculations Comparison

HLM Suggested Local Housing Need figure derived from Standard Method

Fenland - $(1 \times 517) + (18 \times 556) = 10,525$

HLM suggested - $19 \times 556 = 10,564$

Strategic Infrastructure Uplift

Fenland - None applied

HLM 5% = 528

Buffer

Fenland None applied

HLM - 20% = 2,218

Housing Requirement

Fenland - 10,525

HLM - 13,310

HLM therefore recommend that the Housing Requirement for the Fenland Local Plan period 2021 to 2040 is increased to 13,310 dwellings.

Meeting the Housing Requirement

Included in Policy LP2 is a windfall allowance of 1,500 dwellings which equates to circa 14% of the total number of new dwellings included in the supply for in the Plan period to 2040. Whilst the principle of a windfall allowance is supported by the Framework, it is clear that there should be “compelling evidence that they will provide a reliable source of supply”(emphasis added).

Whilst it is clear that there has been a high level of windfall development in Fenland District in recent monitoring years¹¹, there has been no assessment made which considers future windfall potential and how this might contribute to housing land supply in the Plan period to 2040. Past trends in themselves do not constitute compelling evidence, and thus until such evidence is produced by the Council a windfall allowance should not be included in the supply.

The Council will also need to clearly evidence other elements of the supply, particularly providing a realistic assessment of likely rates of delivery on the larger scale developments proposed to be allocated

Spatial Strategy

Policy LP2 sets out the distribution of new residential dwellings having regard to the settlement hierarchy. The following comments are made:

The distribution of new dwellings is weighted towards March, where 1 in 4 of all new homes are expected to be delivered. This places an over reliance on a small number of allocations to deliver significant levels of housing and affordable housing that are central to the success of the Plan and its objectives. The capacity of the town, its

LP2: Spatial Strategy for the Location of Residential Development

infrastructure, and housing market to sustain that level of growth over the Plan period has not been demonstrated and is a risk. The point is illustrated in the table below:

The distribution of new dwellings also does not take sufficient account of the viability challenges faced in the north of the District as evidenced within the Local Plan and CIL Viability Assessment. If the Sustainability Objective is to provide decent and affordable homes to meet the ‘high need’, then the distribution should be weighted more towards the ‘southern area’ where delivery is more likely to occur and needs likely to be met.

The distribution of new dwellings needs to now take account of the opportunity presented by a second phase of development at land south of Chatteris which is described in more detail below.

There is a strong case for additional housing growth to be directed to Chatteris in response to:

- a. planned and potential infrastructure improvements,
 - b. the need to ensure the town maintains balanced growth of homes and jobs throughout the Plan period to 2040, and
 - c. the need to maximise delivery of new affordable homes
-

LP2: Spatial Strategy for the Location of Residential Development

Title:	Mr	Position:	
First Name:	Tony	Organisation:	Bidwells LLP
Surname:	Love		

Comment	Object
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Standard method calculation:

Draft Policy LP2 advises that there is a housing requirement of 10,525 new dwellings to be delivered between April 2021 and 31st March 2040. The policy advises additionally that growth would be focused on the four market towns of Fenland, with March to deliver the largest amount (i.e., 2,746 homes, which is approximately 26% of the district required housing figure). Further to review, the total allocations for March (including extant permissions) identified under draft Policy LP39 would equate to 2,597 dwellings.

In terms of the calculation figures across the Local Plan, paragraph 5.2 recognises the standard method to investigate Local Housing Need. Paragraph 5.3 states that this Standard Method calculated a local housing need for Fenland of 556 dwellings per annum, from 2022 onwards. This increased from 517 dwellings as a result of the ONS publishing new affordability data.

As such, the requirement is 517 dwellings from April 2021 to March 2022, and 556 dwellings from April 2022 to 31 March 2040 (18 years), which totals the 10,525-figure quoted in draft Policy LP2.

From inspection of Local Plans, Inspectors have consistently required local planning authorities to advise whether the figure generated from the 'Standard Method' is lower than the 'Overall Actual Need'. We object to draft Policy LP2 given that the draft Local Plan and associated document library do not make this clear or clarify on this matter. Furthermore, the calculation of this need would need to account for any release of recent data (and associated interpretations of data) of Census 2021 information. The ONS has detailed population increases in Fenland and therefore increases in district population will have implications on housing growth to its settlements.

Recommendation: Update draft Policy LP2 and the supporting text to clarify the relationship between figures obtained from the 'Standard Method' and calculated overall actual need, as well as to clarify how overall actual need has been calculated.

Needs:

In addition, it would appear that a specific 'supply-side' buffer has not been proposed within the draft Fenland Local Plan (2019).

Paragraph 5.7 to 5.12 of the draft Fenland Local Plan makes reference to the 5% buffer, which is as advised under paragraph 72 of the NPPF (2021), to be included within the five-year housing land supply calculations. Paragraph 5.11 states that the latest Housing Delivery Test (HDT) results, published in January 2022, were at 95%. Paragraph 76 of the NPPF only requires the LPA to produce an action plan to address housing requirements where HDT falls below 95% and therefore this LPA has not produced a plan.

Reviewing the latest five-year Housing Land Supply Report (Fenland District Council, September 2021), Fenland District Council do apply the 5% buffer to its calculation for the five-year period. The current five-year housing land supply figure is 6.69 years, based on this report. Although this demonstrates adequate housing delivery within the authority area of Fenland District Council, this report was produced prior to the proposed 'deallocation' of this site. We therefore object to the draft Local Plan and recommend that, a new report is produced that is both up to date, in line with the plan submission but which also recognises the Council's proposed allocations and deallocations. This is significant because the September 2021 calculation would have been mindful of the extant Policy LP9 allocation for West March. The proposed deallocation of this land and the proposed subsequent removal of housing land would have a major impact on housing delivery.

Separately, the identified requirement of 10,525 new dwellings, to be delivered between April 2021 and 31 March 2040, would be supported by an approximate 2.8% buffer, at 10,828 dwellings (which is underlined by windfall

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development and land with extant planning consents for residential development). This buffer is less than the 5% buffer identified in the five-year Housing Land Supply Report. Fenland District Council should therefore seek to bolster this buffer zone to 5%, through the additional allocation of sites.

Affordable housing:

Paragraph 13.5 of the draft Local Plan states that the affordable housing need is approximately 289 dwellings per year. This is over half of the significant proportion of the dwellings required to be delivered per year (556 dwellings from 2022 onwards). The supporting viability details advise that residential development across the Authority area would not reach or come close to 50%, which thereby would result in affordable housing deficiencies.

Increasing the level of house building in the district (through additional residential allocations) would enable the opportunity to increase affordable housing delivery and this does not appear to have been explored through the Issues and Options consultation and Sustainability Appraisal as to why such an approach would not be appropriate. This is especially in a location whereby such affordable housing needs are known, and delivery is vital.

Title:	Ms	Position:	Chair
First Name:	Ruth	Organisation:	Doddington Parish Council
Surname:	Hufton		

Comment Object

Large villages are being asked to absorb the same amount of housing as towns (see Doddington & Whittlesey) - this goes against the statement that the majority of new residential development will be focused on the four market towns.

Title:	Mr	Position:	
First Name:	Andy	Organisation:	The Abbey Group Cambridgeshire Ltd
Surname:	Brand		

Comment Object

For the reasons which have been set out in our response to draft Local Plan policy LP1 we consider that March (and the other Market Towns within the District) are capable of accommodating additional dwellings – one such example is land west of 43-69 Wimblington Road where a development of c.50 new dwellings would be able to be accommodated (see the location plan and draft layout plan attached to this representation). That location is immediately to the east of draft housing allocation LP39.03. The site is within the defined settlement boundary within the draft Local Plan but should be identified as a housing allocated in its own right. The site has vehicular access to Wimblington Road.

Abbey Properties Cambridgeshire Limited is promoting the site for the landowners and advanced discussions are taking place with a developer. A full planning application is intended to be submitted in November 2022. The site has been the subject of pre-application discussions with the District Council.

We have undertaken technical studies in relation to matters including flood risk, drainage, transport and ecology. The development would deliver neutral or positive impacts in relation to these matters.

We also note that a 3% buffer has been applied to the housing figures in the Growth Strategy table within the policy – the earlier text suggests a 10% buffer (draft Local Plan paragraph 7.5) albeit paragraph 5.11 identifies that a 5% buffer may be appropriate. This should be clarified.

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Title:		Position:	Senior Land and Planning Consultant
First Name:	Ian	Organisation:	Boyer
Surname:	Long		

Comment **Neutral**

Reference is made to Neighbourhood Plans in LP2. The March Neighbourhood Plan (NP) provides support in NP Policy H1 for the allocations in March, including 'West March' which as per adopted Local Plan Policy LP9 is a strategic allocation for the delivery of approximately 2,000 dwellings.

The LP9 allocation includes 'Land west of Princess Avenue, March', which as described in Paragraph 1.2 of these representations, is currently subject to an ongoing outline application for residential development. This inherently demonstrates the deliverability of this site and should reinforce the continued inclusion of this site as part of the proposed allocation in emerging Policy LP39 and LP41

Title:		Position:	
First Name:	Lawrence	Organisation:	Friends of Wenny Road Meadow
Surname:	Weetman		

Comment **Object**

General comments:

We think that the Local Plan should revisit the scale of development in Chatteris in light of the possible removal of all bus services from the town from November 2022 (or only a guarantee that some services will be saved until March 2023), as this will have a direct impact upon access to amenities and employment in adjacent towns. This will increase dependency upon car use and will not provide the "genuine choice of transport modes" required by NPPF 73. It may, therefore, be appropriate to review the number of dwellings that can be supported by District Centres in comparison to other places. It is becoming increasingly clear that the longevity of bus services cannot be relied upon as a means of reaching leisure, shopping, health, and community facilities and services in adjacent settlements.

Chatteris is set to grow by a substantial amount within the local plan period, more than any other market town when compared with the number of dwellings at the 2011 census. The current housing allocation would result in 38% growth in the number of dwellings in Chatteris compared to 2011, whereas this figure stands at 27% for March, 17% for Wisbech and just 16% for Whittlesey. In this context, whether or not Chatteris can sustain such levels of growth is questionable and the spatial allocation for residential development in Chatteris is already at the upper end of what would be acceptable or feasible. It seems reasonable to say that no further housing should be allocated beyond that already included in the draft local plan.

In light of this, and of the lack of public transport to access other services, it may be wise to consider whether some of the housing allocation for Chatteris should be redistributed to the larger market towns with a greater range of local facilities (such as a public swimming pool) and access to railway services.

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Title:		Position:	
First Name:	Susie	Organisation:	St John’s College Cambridge
Surname:	Wood		
Comment	Support		
Support for the proposed focus of the majority of new residential development in and around Fenland’s four market towns and towards March in particular as proposed.			

Title:		Position:	
		Spatial Planning Advisor	
First Name:	Tess	Organisation:	Anglian Water Services Limited
Surname:	Saunders		
Comment	Object		
We note the settlement hierarchy and spatial strategy for the distribution of housing growth (estimated 10,525 dwellings), is based on evidence developed by the council, but it is unclear whether it has been informed by the Outline Water Cycle Study. We would support a further iteration of the Water Cycle Study to enable updates following the publication of the Drainage and Wastewater Management Plan (DWMP) and the emerging Water Resources Management Plan (WRMP24) and other matters raised through this submission; this would provide a quantitative evidence base which would help inform the spatial distribution and phasing of growth and the compliance of the options proposed with the sustainability hierarchy.			
We would also support a methodology that quantifies the carbon emissions that the site and its supporting infrastructure would generate through is construction and then use. This approach reduces the capital (embedded) carbon for new infrastructure and focusses future investment for improvements in fewer locations.			

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Title:

Position:

First Name: Carole and Susan

Organisation:

Surname: Fisher

Comment

Object

For the reasons which have been set out in our response to draft Local Plan policy LP1 we consider that March (and the other Market Towns within the District) are capable of accommodating additional dwellings – one such example is land west of 43-69 Wimblington Road where a development of c.50 new dwellings would be able to be accommodated (see the location plan and draft layout plan attached to this representation). That location is immediately to the east of draft housing allocation LP39.03. The site is within the defined settlement boundary within the draft Local Plan but should be identified as a housing allocated in its own right. The site has vehicular access to Wimblington Road.

Abbey Properties Cambridgeshire Limited is promoting the site for the landowners and advanced discussions are taking place with a developer. A full planning application is intended to be submitted in November 2022. The site has been the subject of pre-application discussions with the District Council.

We have undertaken technical studies in relation to matters including flood risk, drainage, transport and ecology. The development would deliver neutral or positive impacts in relation to these matters.

We also note that a 3% buffer has been applied to the housing figures in the Growth Strategy table within the policy – the earlier text suggests a 10% buffer (draft Local Plan paragraph 7.5) albeit paragraph 5.11 identifies that a 5% buffer may be appropriate. This should be clarified.

Title:

Position:

First Name: Paul and Belinda

Organisation:

Surname: Clark

Comment

Object

For the reasons which have been set out in our response to draft Local Plan policy LP1 we consider that March (and the other Market Towns within the District) are capable of accommodating additional dwellings – one such example is land west of 43-69 Wimblington Road where a development of c.50 new dwellings would be able to be accommodated (see the location plan and draft layout plan attached to this representation). That location is immediately to the east of draft housing allocation LP39.03. The site is within the defined settlement boundary within the draft Local Plan but should be identified as a housing allocated in its own right. The site has vehicular access to Wimblington Road.

Abbey Properties Cambridgeshire Limited is promoting the site for the landowners and advanced discussions are taking place with a developer. A full planning application is intended to be submitted in November 2022. The site has been the subject of pre-application discussions with the District Council.

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Title:		Position:	Senior Planner
First Name:	Reiss	Organisation:	Marrons Planning
Surname:	Sadler		

Comment	Object
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Policy LP2 applies the Government’s Standard Method to calculate Local Housing Need, as advocated by the Framework and supporting national guidance. The following comments are made:

The Local Housing Need has been calculated by applying Fenland District Council’s 2020 affordability ratio (published March 2021) of 7.32 to the first year of the Plan period (2021/22) and applying the 2021 affordability ratio (published March 2022) of 8.91 for the remaining Plan period (2022/23 to 2039/402). There is no justification for this provided in the Plan and this approach is not supported by the Framework or supporting national guidance; national guidance is clear that “the most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used”³. As such, it is suggested that the minimum Local Housing Need for the Fenland Local Plan period 2021 to 2040 should be 19 years multiplied by 556 dwellings, equating to 10,564 dwellings.

Further, the Framework and supporting national guidance are clear that the Standard Method calculates a “minimum number of homes needed”⁴ (emphasis added), and provides some examples of where an uplift in the Local Housing Need figure derived from the Standard Method is likely to be appropriate.

This includes strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; this is particularly relevant to Chatteris where planned development south of the town includes a Southern Bypass between Ireton’s Way and London Road. HLM also consider that the proposed aspiration to significantly boost employment growth and job creation in Chatteris with the two ‘broad locations’ is likely to change economic circumstances in the town and drive an increase in the demand for homes from employees.

As such, it is recommended the Council consider an uplift (5%) be applied to the Local Housing Need derived from the Standard Method to take account of strategic infrastructure improvements and planned significant employment growth at Chatteris. A 5% uplift would equate to circa 500 dwellings.

HLM also raise concerns with the lack of an appropriate buffer incorporated into the Housing Requirement calculation. The incorporation of a buffer allows for a level of assurance and flexibility for the Plan period, which is particularly important in the context of a District with a rising affordability ratio⁵, a marginal and consistent low Housing Delivery Test measurement (including most recently of 95% which avoided any consequences by just 1%)⁶, and where there are clear development viability challenges.

Although paragraph 7.5 refers to a 10% buffer, Policy LP2 only includes a buffer of circa 3%.

The incorporation of an appropriate buffer would account for the inevitable expiry of commitments included in the supply, of which there is a significant number in Fenland District (4,230 dwellings)⁸ with no account taken of lapse rates in the calculation of available housing supply to date.

The Local Plans Expert Group recommended to Government in 2016 that a 20% uplift to housing requirement should be applied to enable a Local Plan to be considered resilient⁹, with the introduction of the Standard Method not invalidating nor inherently taking account of this advice.

As such, it is contended that a 20% buffer should be applied to the Local Housing Need calculation to provide flexibility and resilience, and to limit the likelihood of the Council being unable to demonstrate a positive Five Year Housing Land Supply position during the Plan period to 2040. A 20% buffer equates to an additional 2,324 dwellings, increasing the Housing Requirement to 13,944 dwellings.

The difference in calculation of Housing Requirement for the Fenland Local Plan is illustrated below in Table 1.

HLM therefore recommend that the Housing Requirement for the Fenland Local Plan period 2021 to 2040 is increased

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to 13,310 dwellings.

Meeting the Housing Requirement

Included in Policy LP2 is a windfall allowance of 1,500 dwellings which equates to circa 14% of the total number of new dwellings included in the supply for in the Plan period to 2040. Whilst the principle of a windfall allowance is supported by the Framework, it is clear that there should be “compelling evidence that they will provide a reliable source of supply”¹⁰ (emphasis added).

Whilst it is clear that there has been a high level of windfall development in Fenland District in recent monitoring years¹¹, there has been no assessment made which considers future windfall potential and how this might contribute to housing land supply in the Plan period to 2040. Past trends in themselves do not constitute compelling evidence, and thus until such evidence is produced by the Council a windfall allowance should not be included in the supply.

The Council will also need to clearly evidence other elements of the supply, particularly providing a realistic assessment of likely rates of delivery on the larger scale developments proposed to be allocated

Spatial Strategy

Policy LP2 sets out the distribution of new residential dwellings having regard to the settlement hierarchy. The following comments are made:

The distribution of new dwellings is weighted towards March, where 1 in 4 of all new homes are expected to be delivered. This places an over reliance on a small number of allocations to deliver significant levels of housing and affordable housing that are central to the success of the Plan and its objectives. The capacity of the town, its infrastructure, and housing market to sustain that level of growth over the Plan period has not been demonstrated and is a risk. The point is illustrated in the table below:

The distribution of new dwellings also does not take sufficient account of the viability challenges faced in the north of the District as evidenced within the Local Plan and CIL Viability Assessment. If the Sustainability Objective is to provide decent and affordable homes to meet the ‘high need’, then the distribution should be weighted more towards the ‘southern area’ where delivery is more likely to occur and needs likely to be met.

The distribution of new dwellings needs to now take account of the opportunity presented by a second phase of development at land south of Chatteris which is described in more detail below.

There is a strong case for additional housing growth to be directed to Chatteris in response to:

- a. planned and potential infrastructure improvements,
- b. the need to ensure the town maintains balanced growth of homes and jobs throughout the Plan period to 2040, and
- c. the need to maximise delivery of new affordable homes.

Infrastructure

Land south of Chatteris, site allocation reference LP46.11, is making provision for significant infrastructure improvements to the town; including a Southern Bypass connecting Ireton’s Way and London Road, land and funding towards the provision of a new primary school, provision of a local centre and community space, and a further investment into local infrastructure and facilities totalling circa £7.5m.

As set out in further detail below, a second phase of development coming forward later in the Plan period has the potential to make best use of this investment in infrastructure, sustain the growth of the town, and provide further infrastructure improvements. This could include the implementation of further sections of the Chatteris Ring Road in order to improve the environment and economy of the town centre through the removal of through traffic. This is a key aspiration for the town.

Balanced Growth

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In addition, and as recognised in the Fenland Draft Local Plan, Chatteris has a strong existing employment offer ranging from large-scale food production and high-end engineering firms to dynamic small-scale and start-up businesses¹³. Businesses surveyed in the formulation of the Chatteris Community Plan identified that the majority of employees who work in the town commute from elsewhere with a heavy reliance on the private car, and that a significant number of employers had difficulty in employing local people. There is strong support therefore for additional new dwellings in Chatteris to address this potential barrier to investment¹⁴, and improve sustainability.

Significant further employment growth is proposed in the Fenland Draft Local Plan in Chatteris, with 51.59ha employment land in the pipeline: 10.63ha of committed large sites and 40.96ha proposed new site allocations¹⁶. In addition, there are aspirations to significantly boost employment growth and job creation in Chatteris, with two broad locations for employment growth identified which could provide a further 100ha of employment growth in the town

This proposal for some 500 dwellings at Chatteris would increase the proportion of housing supply to circa 20%, which would better reflect the proportion of the increase in employment land supply at the town (24%) as well as the additional broad locations.

Directing additional new dwellings to Chatteris will help the Plan's employment growth aspirations come to fruition, as it will provide investors and businesses with confidence that there is a growing local workforce who can access employment in a sustainable manner and provide a range of skills to carry out the required functions of the businesses.

Affordability

Increasing supply in Chatteris would also focus more growth in the 'southern area' where more affordable homes are likely to be delivered due to the relative viability of development across the District. The delivery of 100 additional affordable homes (as part of the 500 new homes) would be a significant contribution to the needs of the town and wider area.

HLM therefore respectfully request the Council reconsider the distribution of new dwellings in LP2, and that additional housing growth at Chatteris is justified and appropriate.

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Title:		Position:	Planning Administrator
First Name:	Mercedes	Organisation:	Robert Doughty Consultancy
Surname:	Golding		

Comment Object

The distribution of development across settlements is not justified.

The growth target for Whittlesey, which includes the adjacent settlements of Eastrea and Coates included in the Whittlesey Neighbourhood Plan Area, is very low, especially compared to the growth allocated to the other market towns, the role and function of the settlement and its ability to support growth.

Paragraph 61 of the NPPF states, “to determine the minimum number of homes needed, strategic polices should be informed by a Local Housing needs assessment, conducted using the standard methodology.” In effect, the housing target should provide a lower, and not an upper, limit to growth. The approach adopted in Policy LP2 is that the housing target is a ceiling to growth and is, therefore, contrary to NPPF Paragraph 61.

The Local Plan growth figures promoted are much lower than those(set out in the Whittlesey Town Council Housing Needs Assessment prepared by AECOM) that informed the preparation of the Whittlesey Neighbourhood Plan. The Neighbourhood Plan is currently undergoing Examination and is expected to be “Made” before the Local Plan is adopted. The Whittlesey Town Council Housing Needs Assessment prepared by AECOM identified a range of housing targets for the Whittlesey Area, as follows:

127 DwPA based on the Adopted Local Plan
139 DwPA based on the Fenland SHMA
116 DwPA based on the DCLG housing projections
1,120 over the period 2017 to 2031 based on past delivery (80 a year).

In comparison, the growth promoted in the draft Local Plan of 886 dwellings for Whittlesey, with 430 in Coates and 12 in Eastrea over the period 2021 to 2040 translates to 70 dwellings per year, significantly less than all the above projections. Only the target based on past delivery is closer ,and even then the proposed target is lower than past delivery.

Arguably, the “past delivery rate” represents a failure to meet the demand for growth in the area and efforts should be taken to address the shortfall, not to seek to impose a cap on development. The housing targets promoted in the Draft Local Plan represent a limit on development in the Whittlesey Neighbourhood Plan area, including Eastrea and Coates. This represents a significant cap on the ability to meet demand. The imposition of a cap on development has not been acknowledged or justified either in the draft Local Plan or in the supporting evidence.

Furthermore, the approach to settlement targets is contrary to paragraph 61 of the NPPF, because the housing targets are:

1. driven by existing commitments and allocations, rather than an assessment of need, and,
2. treated as a ceiling to growth, and not a floor.

The target for growth in the Whittlesey area should be reconsidered in light of the evidence set out in the Whittlesey Town Council Housing Needs Assessment.

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Title:		Position:	Director
First Name:	Becky	Organisation:	Johnson Mowat
Surname:	Lomas		

Comment Object

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Housing Requirement

2.2.1 Paragraphs 5.2 – 5.6 of the Local Plan supporting text notes that in understanding the housing requirement for the District, the standard method is the starting point for the Local Housing Need (LHN) figure. There is no dispute that, using the appropriate method as set out in National Planning Practice Guidance (PPG) – Housing and Economic Need Assessment, the Local Housing Need figure of 556 dwellings per annum is correctly calculated.

2.2.2 It is noted that the Council have identified a step change in the Local Housing Need as follows:

- 517 dwellings per annum for 1st April 2021 to 31st March 2022; and
- 556 dwellings per annum for 1st April 2023 to 31st March 2040.

2.2.3 Overall policy LP2 seeks to deliver “a housing requirement of 10,525 new dwellings between 01 April 2021 and 31 March 2040”.

2.2.4 The figure derived by the Standard Method is identified by the PPG as a “minimum annual housing need figure. It does not produce a housing requirement figure¹”.

2.2.5 Whilst it is acknowledged that the Standard Method is an appropriate starting point to assess the housing need, and this is not disputed by Johnson Mowat, it is our view that the housing need is likely to be higher to deliver the Strategy set out in the Local Plan. The PPG makes provision for circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates². Such examples include (but are not limited to) growth strategies for the area, affordability, infrastructure improvements that are likely to drive an increase in homes and where previous assessments of need have produced outputs at a significantly greater outcome than the standard method.

2.2.6 The Local Plan sets a continued theme to encourage and promote growth within the District. The Vision states that all settlements will benefit from economic growth and inward investment and that there will be growth in homes and jobs to tackle health inequalities, community depression, infrastructure deficit and low skills. It further states that growth will attract investment, businesses and new residents to the district. In striving to only meet the LHN as a housing requirement the Council are limiting opportunities to realise this growth. Reliance on the minimum annual housing need figure does not align with the Council’s growth aspirations for increased prosperity in the area.

2.2.7 Of significant concern is the affordable housing need within the District. This is a crucial factor in understanding whether the Council should be seeking to deliver a higher housing requirement. The PPG is clear that “an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes³”. The Strategic Housing Market Assessment (SHMA) evidence base, and replicated at paragraph 13.5 of the Local Plan, identifies an affordable housing requirement of around 289 dwellings per annum, over 50% of the total housing need for Fenland.

2.2.8 It is important to acknowledge the recent ‘HDH Planning and Development’ Independent Viability Report (IVR) commissioned by Fenland District Council (dated December 2019) and the subsequent Viability Note (dated May 2022) in respect of site viabilities across the District and the challenges that some developments are finding in meeting infrastructure and mitigation costs. The IVR is an evidence-based document to support the production of the Local Plan going forwards. The conclusions and recommendations do not represent FDC policy but are intended to inform the Local Plan preparation.

2.2.9 In summary the report concludes (see Para. 12.99 and 12.100) that the property market across the Fenland District is mixed. In general, viability in Fenland is marginal and there is a clear north-south divide, with development

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in the northern part of the district (North of the A47 Guyhirn roundabout) between 10% to 15% lower in terms of viability than the rest of the District. The IVR demonstrates that a 20% affordable housing requirement can be achieved in the south of the District, and none in the north. Indeed Para. 12.100 states:

“This is to be expected, generally the Council is achieving Affordable Housing on greenfield sites but not on brownfield sites. The Council should be cautious about allocating sites in the north of the District or relying on the brownfield sites, (for example within the five-year land supply assessment)”.

2.2.10 The IVR sets out that on average, greenfield site developments should be expected to achieve 20% affordable housing with £2,000 per plot social infrastructure contributions. This is acknowledged by FDC, essentially as an expected starting point for future schemes 2.2.11 That said, the identified affordable housing percentage, and provisions of Local Plan policy LP12: Meeting Housing Needs, Part B Affordable House, are insufficient to meet the identified affordable housing need. There is a clear shortfall in the delivery and need for affordable housing which could be addressed through the delivery of further housing.

2.2.12 In reviewing the background evidence to the Local Plan, Johnson Mowat have not found any sustainability testing of other housing delivery options. The documentation available, through the Sustainability Appraisal address only a housing requirement in line with the Standard Method. Evidence that other scenarios, including higher housing requirements to address growth aspirations and affordability issues, should be presented.

2.2.13 At the very least the policy wording should be amended to make it clear that any adopted housing requirement, as set out in LP2, is a minimum and does not represent a ceiling point.

2.2.14 It is clear that the Local Plan requirement in Policy LP2 has no headroom to accommodate the changing circumstance of the District within the Plan period. For example, the Affordability Ratios in Fenland since 2020 have already increased significantly from 7.32, as used in deriving the annual need figure, to 8.91 in the latest March 2022 published statistics⁴; it is therefore shown that affordability is an increasing problem. The use of the minimum LHN figure as an annual requirement in the Local Plan allows no flexibility to respond to such changing circumstances. To address the shortfall in affordable housing delivery the Council should make provision for a greater number of allocations in order to increase the supply of affordable housing. In this respect we align ourselves with the view of the HBF.

Housing Supply

2.2.15 Policy LP2 identifies that the Local Plan makes provision for an estimated 10,828 dwellings over the plan period. This equates to a buffer of circa 3% (303 dwellings) above the identified LHN. This is considered to be a low buffer and a greater percentage should be considered in order to significantly boost the supply of housing delivery as per the requirements of the National Planning Policy Framework (‘the Framework’). A minimum of at least 5% is suggested.

2.2.16 It is noted that the identified allocations include sites for housing development with extant planning permission (sites with extant planning permission or resolution to grant planning permission at 1st April 2021 with total site capacity of 5 or more dwellings). The yield associated with those sites reflects the net commitment at 01 April 2021. What is not clear, is whether the Council has made any provision for anticipated lapse rates or non-implementation of these sites which could leave the Council short of delivery against the housing requirement. In such an event, the small 3% buffer is insufficient to cover any lapse or non-implementation of the existing commitments.

2.2.17 Furthermore, it is noted that the Council have included Policy LP24: Biodiversity Net Gain, seeking delivery of 10% net gain on all qualifying development proposals. It is Johnson Mowat’s experience that the overall yield of developable sites reduces where 10% biodiversity net gain is to be delivered on site. The Council is asked to demonstrate that such policy provisions have been factored into the anticipated capacity of future allocations to ensure that those sites identified can meet the identified housing requirement. This matter has a significant knock-on consequence to the overall deliverability and viability of sites, a topic which is picked up by the HBF within their representation and a position which is supported Johnson Mowat.

2.2.18 Such matters again reinforce the importance of a realistic buffer of allocated sites in order to fulfil the plan’s requirements.

Growth Strategy

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2.2.19 As set out under policy LP1, the settlement hierarchy is supported. Generally, the Growth Strategy to focus the majority of the new distribution to the four Market Town's is welcomed. However, it is our view that the apportionment of just 63% of the District's total housing requirement to the Market Towns does not go far enough to meet this strategy. The Sustainability Appraisal supporting the emerging Local Plan identifies that Growth Strategy Option 2: Market town-led growth – Concentrating growth principally in the towns of Wisbech, March, Whittlesey and Chatteris, received the greatest number of significant positive scores of all the growth strategy options appraised. It is logical that growth is in locations where there is best access to employment, education, services and community facilities and considering the benefits that arise as a result of the reduced need to travel and public transport provision in these localities. Such a growth strategy would allow up to 90% of the District's housing to be identified within the Market Towns and the remainder within the Large, Medium and Small villages. Windfall allowance should remain outside of the apportionment of the housing requirement, thereby providing a further buffer for housing delivery and fulfilling the national requirement to boost significantly the supply of housing.

2.2.20 Furthermore, it is noted that Chatteris is apportioned 17% of the total housing requirement across the plan period, equating to a total of 1,737 new units. In the first instance, this figure should be adjusted in line with our commentary in relation to the overall housing number, anticipated allocations across the District and general apportionment to the Market Towns.

2.2.21 It is noted that the spatial strategy for employment growth, Policy LP3, apportions equal percentages of employment growth to both Market Towns of March and Chatteris. However, in relation to housing Chatteris receives a significantly lower portion of the housing requirement than March; 17% to Chatteris in comparison to 26% to March. There is no justification within the supporting Local Plan documentation to evidence such a disparity. It is respectfully stated that the general apportionment to Chatteris should be increased.

2.2.22 Full regard is had to the background document Survey of Fenland Settlements Existing Services and Facilities (May 2022). The appraisal of Chatteris rates the settlement highly in relation to all existing services and facilities. Extract below.

The above clearly demonstrates that, notwithstanding the provision of a railway station, the two settlements are comparable in the range of services and facilities available. It is therefore reasonable that the apportionment of housing to each of these settlements should be comparable.

Housing Trajectory

2.2.24 The Local Plan is front loaded with delivery tailing off from the year 2029/2030. We note in the HBF representations that the Local Plan would not ensure a rolling five-year housing land supply with supply falling below the requisite 5 years at 2029/30 onwards. In order to meet the requirement for a continued rolling five-year housing land supply further sites should be identified to assist with the delivery of housing within the second half of the plan period. It is our view that waiting for the required Local Plan review in five years' time would be too late for such action.

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

Comment Object

The Doddington Neighbourhood Plan Group fundamentally disagrees with the apportionment of new housing in the Growth Strategy table within this draft policy.

The proposed number of new dwellings contradicts the assertion in paragraph 7.5 that the strategy ‘directs growth principally to market towns’. There is insufficient and no justified evidence within the plan and the supporting documents as to why relatively limited growth is proposed within certain Market Towns and much greater growth in the large villages.

The Group considers that the growth across the Market Towns should be around 30% of their existing housing stock. This requires a small increase in housing within March, a modest increase at Chatteris and more significant growth within Wisbech and Whittlesey. There appear to be some locations within the proposed settlement boundaries which could accommodate new housing.

The proposed scale of growth in the Large Villages is grouped together. The apportionment across the three villages is weighted as follows (figures taken from Table 3 of the Draft Local Plan – Sites Evidence Report (Part D)):

Doddington 355
Wimblington 223
Manea 220

It is unclear from the plan and the evidence base why Doddington is expected to accommodate considerably higher housing growth than the other two Large Villages.

The Group is aware of considerable constraints to additional housing growth in Doddington such as:

- a) Currently the local village primary school is at capacity and in 2022 a number of local Doddington residents have been unable to secure places for their children.
- b) The Education Officer at the County Council has advised the Group that the primary school needs to expand in order to accommodate additional children within the village. The Group is not aware of any viable options to extend the school to the required level.
- c) There are considerable surface water drainage and foul water connection concerns across the village. We do not consider that the Local Plan adequately considers the surface water drainage maps which must inform the sequential test which must be applied to consider suitable housing allocations (NPPF paragraph 161). There are a number of proposed housing sites within Doddington which are impacted by this – see our further comments on the proposed housing allocations. The position with regard to foul water remains uncertain and the Group are aware that Anglian Water is regularly having to empty sewage from the system to free up capacity (which is an unsustainable approach).
- d) Whilst the village benefits from existing services the GPs are seemingly at capacity and in need of expansion. It is not clear whether expanding the existing facilities to the extent that would be required to accommodate the volume of housing which is proposed is viable. The village also lacks sufficient care home facilities.
- e) The village has an historic core which contains a number of Listed Buildings and a Conservation Area. These require appropriate protection via statute and recent and currently proposed developments are threatening to irrevocably harm this character.
- f) Recent announcements regarding the cessation of public transport (bus) routes to and from the village would undermine the sustainability of the village further.

LP2: Spatial Strategy for the Location of Residential Development

In light of the above an alternative housing growth strategy (to replace that within Policy LP2) is considered reasonable as set out in the table below. The table should make the proposed growth in housing explicit:

(The Table is to found as an attachment within the representation)

The Group firmly considers that draft Policy LP2 is not sound for the following reasons.

- i)The policy is not justified in seeking to deliver such a low level of housing growth within the Market Towns and then such a high level of housing growth within the villages. In Doddington in particular the level of growth represents 40% of the growth proposed within Whittlesey and, based upon Cambridgeshire Insight 2020 figures, represents a 34% increase in new housing within the village. That is a very substantial level of new housing growth within a village which is constrained as has been set out above. There can be no, nor has a sufficient, justification made for the proposed level of housing growth in a village location.
- li)The policy is not consistent with national policy as it directs large housing growth to village locations without considering whether this can be accommodated in more sustainable locations within Market Towns. The Market Towns provide access to services and facilities whereas villages such as Doddington are unable to. The Council’s approach is contrary to a principle of sustainable development (which is set out within paragraph 8 of the NPPF) that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.
- lii)The sequential test has not been applied having regard to surface water drainage = this is contrary to NPPF paragraph 161.

Title:		Position:	Senior Land and Planning Consultant
First Name:	Ian	Organisation:	Boyer
Surname:	Long		
Comment	Support		
We agree that March should make the greatest provision of housing growth in the District, reflective of the strength of the service and facility base, and employment opportunities, that the town benefits from. The growth directed to March will assist in the sustained vitality of the town and enable wider economic growth to be delivered over the plan period and beyond			

LP2: Spatial Strategy for the Location of Residential Development

Title:		Position:	
First Name:	Thomas	Organisation:	Pegasus Group
Surname:	Kilvert		

Comment	Object
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These representations are submitted by Pegasus Group on behalf of Cannon Kirk (UK) Ltd who has land interests at South-East March (Adopted Local Plan Policy LP9).

We have submitted responses to the previous stages of the Local Plan in relation to this site. These representations should be read in conjunction with these previous comments.

Our client supports the broad issues set out in the draft Fenland Local Plan and the principles which underpin the 'Vision' of the draft Plan.

The vision states that growth will be focused on the four market towns and these will be attractive and prosperous places to live. This is fully supported.

However, it is considered that the level of housing development proposed for March in the draft Local Plan will not be adequate to meet the needs of future generations and may not meet this vision of the Plan as an opportunity will be missed to provide significant development in a most sustainable location in the District.

As set out in the National Planning Policy Framework (Chapter 2), achieving sustainable development is key and has three overarching objectives: economic, social and environmental, and that planning policies and decisions should play an active role in guiding development towards sustainable solutions. A social objective of the Framework ensures that a sufficient number and range of homes can be provided to meet the needs of present and future generations. In order to achieve this objective, it is considered that all opportunities should be taken to provide a flexible housing delivery strategy to ensure an adequate provision of housing is maintained in the most sustainable locations.

The Plan in Section 5 sets out the housing need and requirement for the District from 2021 to 2040 (the plan period) which results in 10,525 dwellings. This is derived from a combination of the Local Housing Need (LHN) before 2022 and after 2022 which ranges from 517 dwellings per year to 556.

dwellings per year. The draft Local Plan states that the LHN figure is likely to change over the plan period and it is the LPA's intention to accommodate the LHN in full.

At the current time, the LPA can demonstrate a 6.69 year housing land supply based on existing commitments and current allocations in the Adopted Local Plan (2014).

Draft Local Plan Policy LP1 sets out the settlement hierarchy for development growth and highlights March as one of four market towns where growth is to be concentrated. This Policy is fully supported and continues the sustainable development strategy of the current Adopted Local Plan.

Draft Local Plan Policy LP2 set out the spatial strategy and housing provision for the District. In total, it is identified that March will provide approximately 2,182 dwellings in new allocations as set out in draft Local Plan Policy 38 and 39. The total number of site allocations in March are 14.

When compared with the current Adopted Local Plan (2014), the total housing requirement was 11,000 (550 per annum) as set out in adopted Local Plan Policy LP4. This is a similar housing requirement to the draft Local Plan. However, the housing requirements in March vary drastically from the adopted Plan to the emerging Pla . The Adopted Local Plan identified 4,200 houses in March whereas the emerging Local Plan is nearly half that figure at 2,182. There is no explanation or clarification as to why this housing figure has been drastically reduced. March is still identified as one of the four main market towns in the District and the vision of the Plan remains the same in terms of providing sustainable development to provide attractive and prosperous places to live. However, the level of growth now identified for March will be half of that previously identified.

It is considered that due to the scale and importance of March within the District's settlement hierarchy, the level of housing growth identified should be commensurate with that identified previously in order to provide appropriate sustainable growth for the District.

LP2: Spatial Strategy for the Location of Residential Development

It is important to ensure that there is an appropriate balance of employment and housing growth in these key settlements and therefore it is considered that the previous level of growth identified for March should continue.

It is noted that a number of adopted housing allocations are not identified in the emerging Local Plan in March and it is considered that these should be included in order to provide this additional growth and the flexibility that the plan needs to meet the ever-changing LHN for the District.

It is considered that additional site allocations need to be included for March in order to provide an appropriate level of housing growth in a market town location which has been identified in Local Plan Policy LP1 as being one of the most sustainable locations in the District. Increasing the housing

LP2: Spatial Strategy for the Location of Residential Development

Title:		Position:	Associate Director
First Name:	Aaron	Organisation:	Strutt & Parker
Surname:	Coe		

Comment **Neutral**

Strutt and Parker have prepared this representation for Strategic Assets on behalf of Cambridgeshire County Council in its role of landowner.

Policy LP2: Spatial Strategy for the Location of Residential Development

The district of Fenland falls within the Cambridgeshire and Peterborough Combined Authority (CPCA) area which has ambitious proposals and funding related to growth, economy and infrastructure. The Local Plan acknowledges that Fenland's market towns and its rural economy have a key role to play in achieving these ambitions.

While the Local Plan highlights the need for growth in employment land and business opportunities it fails to recognise the link between the growth of jobs and housing delivery. It is notable that the evidence base relating to the emerging Greater Cambridge Local Plan identified three growth options as follows; 'minimum' (40,300 dwellings - based upon standard methodology); 'medium' (46,200 dwellings- based upon long term historic employment growth) and 'maximum' (67,700 dwellings – based upon fast economic growth in the recent past).

The draft Fenland Local Plan contains proposals for the growth and regeneration of the district to 2040. In respect of housing need it uses the Standard Methodology, from 2022 onwards which generates a local housing need of 556 dwellings per annum. This translates to 10,525 over the plan.

However, what is clear from the Greater Cambridge evidence base is that following a growth strategy based on the standard methodology will not support the levels of economic growth that the CPCA seeks to deliver for the region, or the Fenland Local Plan's economic growth aspirations. Furthermore, as the Local Plan acknowledges (Fenland Local Plan and CIL Viability Report, March 2020) viability in Fenland is marginal, with a clear north-south divide. This not only has an impact on the ability of the district to deliver the affordable housing it desperately needs, but also the essential infrastructure to support growth.

The viability report also acknowledges that new development in Fenland cannot support CIL as a mechanism for funding strategic infrastructure and as such there will be a reliance on funding from a range of public bodies, including Cambridgeshire County Council and the Combined Authority. Accordingly, it is considered that the Local Plan's housing need and in turn allocations must be ambitious to support the regional growth ambitions of the CPCA as well as the district's own economic ambitions. Clearly, focusing the new local plans housing ambition (target should be avoided as it suggests an upper limit) on only meeting the standard methodology, will not deliver the levels of housing growth necessary to support the Plan's economic strategy, and in accordance with the duty to cooperate the regional economic growth strategy. Neither does it reflect the requirement of the NNPPF for the Plan to be aspirational and significantly boost housing supply. Accordingly, it is considered that the growth strategy set out in Policy LP2 should make provision for a significantly higher number of new dwellings in order for the Plan to genuinely be able to deliver the level of housing over the Plan period to allow district's economy to grow and prosper.

In addition, to the fundamental linkage between growing the economy and delivering the necessary level of housing, there are a number of other challenges the district faces which also need to be acknowledged and accounted for in the growth strategy. These matters additional emphasise the need for the strategy to have greater flexibility which can be achieved through an increased number of allocations to ensure consistent levels of housing delivery can be maintained. In summary, some of the other key challenges are considered to be as follows:

Affordable Housing Delivery: The total annual affordable housing requirement (289 dpa) is around 50% of the total housing need for Fenland. Viability evidence indicates that delivery is marginal and there is a north south divide, with the southern two thirds of the district potentially able to deliver 20% affordable housing and for sites in the north of the district affordable housing is not considered viable or achievable. Notwithstanding this, the proposed policy response is to require 10% affordable housing on sites in the north. This presents two problems, firstly all the potential allocations in the north of the district will be less likely to be delivered because of the viability concerns, but more fundamentally the extent of housing allocations is insufficient to meet the district wider and significant affordable housing need. Increasing the number of site allocations in the district will in turn assist with increasing the delivery of affordable housing.

LP2: Spatial Strategy for the Location of Residential Development

Economic Uncertainties: While it is acknowledged that the current economic situation could not have been entirely foreseen during plan preparation, with currently increasing building and material costs and significant rises in the cost of borrowing, those sites with marginal viability are clearly going to struggle to be delivered in the early part of the Plan period. Increasing the number of site allocations and consequently the supply of sites will spread the risk and allow time for the market to adjust so that delayed sites do not jeopardise annual housing delivery requirements.

Development Densities: With increasing demands being placed on developments to deliver increased quality and respond to environmental issues, development densities are falling particularly in rural areas. New policy requirements are increasingly land hungry, including, carbon neutrality (Policy LP26), on site SUDs attenuation (Policy LP32), on site biodiversity gains (Policy LP25), increased tree planting in developments (Policy LP27), building beautiful (Policy LP7). In response to these pressures, it is our experience that net development densities are falling and certainly in rural districts such as Fenland, sites are no longer able to deliver the 33 dph used in the SHLAA methodology. More commonly net densities of 25 dpa are a more realistically achievable upper limit. This means that the predicted housing delivery in the current allocations may well fall short and as such further sites must be allocated.

Housing Trajectory: In order to maintain a five year housing land supply the Plan includes a housing trajectory, however, this places a significant reliance on existing committed large sites delivering in the early part of the plan period which is propped up by disproportionately large windfall contributions, notably in years 2024/2025 and 2025/2026. This is considered to be a high risk strategy. Furthermore, from 2030 onwards the trajectory does not seem to demonstrate sufficient sites coming forward to maintain a consistent five year supply in the event the significant levels of growth anticipated between 2025 and 2030 have for whatever reason not materialised. Again this suggests that additional sites need to be allocated to ensure consistency of housing land supply.

Sustainability Appraisal (SA): A SA has been undertaken to inform the new Local Plan strategy and assess the potential effectiveness of the proposed policies along with reasonable alternatives. The SA shows that many of the effects of the preferred policies are unclear because of the strategic nature of the Local Plan objectives and policies.

Accordingly, some of the proposed allocations may not be able to deliver in their entirety or have complex issues that will require mitigation and as such delay them coming forward. For example, one such area is the extensive Goose and Swan Functional Land IRZ which covers large swaths of the district. Again this represents a risk to the current assumptions which underpin the strategy. Without increased flexibility through a higher proportion of allocations ultimately the Plan may well be considered unsound at examination.

In conclusion, the draft Local Plan seeks to identify sufficient housing sites to meet housing need through Policy LP2 (Spatial Strategy for the Location of Growth). It has established a settlement hierarchy in Policy LP1 to assist in determining the overall distribution of growth. Fundamentally, the strategy seeks to steer most new development to those larger places that can offer the best access to services and facilities while recognising that smaller communities also required to benefit from an appropriate level of growth to ensure their long-term sustainability. The County Council supports this strategic locational approach.

Policy LP2 links to the site allocations set out in Part D of the Plan and with the inclusion of windfall development and existing sites with planning permission makes provision for a total of 10,828 new dwellings over the plan. While this exceeds the identified need of 10,525 it is a significant concern that there is only a flexibility of 303 units over what is effectively an 18 year period; less than 17 dwellings per year.

Accordingly, while the County Council supports the strategy and general approach to growth, it will be essential that the Plan retains all its current allocations. Furthermore, when considered in the context of the issues outlined above, it is clear that a greater number of allocations must be included to increase housing delivery and introduce greater flexibility. Increasing the number and size of allocations will allow the Plan to respond to economic factors, help boost the supply of housing, and most importantly for the district, increase affordable housing delivery. If the Plan is not aspirational as required by the NPPF, there is a significantly increased risk that it will not be able to deliver its intended objectives, or more immediately be found sound at examination.

LP2: Spatial Strategy for the Location of Residential Development

Title:

Position:

First Name: David

Organisation: The Planning Partnership

Surname: Mead

Comment **Support**

We support the inclusion of land (see attached plan) to the south of Burrowmoor Road within the proposed settlement boundary for March. The land is currently allocated for residential development in the adopted local plan and the March Neighbourhood Plan. The owners of the site through their agents are currently working on the details for the submission of a planning application with a delivery partner. In addition the owners contributed fully with regard to the preparation, consultation and adoption of the Broad Concept Plan. This shows commitment to the delivery of the site for residential development. The BCP was adopted in the summer of 2021, just over 12 months ago, this is not considered to be an excessive amount of time, particularly when the adopted local plan is only 8 years old with a further 12 years to go.

Title:

Position:

First Name: David

Organisation: The Planning Partnership

Surname: Mead

Comment **Object**

We are objecting to settlement boundary proposed for March the north of Burrowmoor Road. The settlement boundary should be drawn to include the land outlined in red on the attached plan. The land is currently allocated for residential development in the adopted local plan and the March Neighbourhood Plan. The owners of the site through their agents are currently working on the details for the submission of a planning application with a delivery partner. In addition the owners contributed fully with regard to the preparation, consultation and adoption of the Broad Concept Plan. This shows commitment to the delivery of the site for residential development. The BCP was adopted in the summer of 2021, just over 12 months ago, this is not considered to be an excessive amount of time, particularly when the adopted local plan is only 8 years old with a further 12 years to go.

LP2: Spatial Strategy for the Location of Residential Development

Title:

Position:

First Name: Richard

Organisation: Richard Brown Planning Limited

Surname: Brown

Comment

Object

These Representations are submitted in response to the consultation relating to the Fenland District Council draft Local Plan 2021-2040.

2. Elmside Limited (hereinafter referred to as “Elmside”) are the owners of the site (hereinafter referred to as the “site”) at Stow Lane Wisbech, which is shown edged red on the attached plan Appendix 1

3. Elmside object to the referenced policies LP2, LP35 and LP36 for the following reasons:

- a) The draft Local Plan in omitting to continue the allocation of the wider site area on the eastern edge of Wisbech as is contained in the adopted Local Plan 2014, Policy LP8.
- b) The Fenland Local Plan 2014 Policies Map confirms the Site is identified as forming part of a strategic urban extension (Policy LP8). The supporting text to Local Plan

Policy LP8 confirms

The allocation will comprise the whole of the land to the east of Wisbech as identified on the Key Diagram and the Policies Map, plus additional adjoining land to the east and/or south of that land as falling in the KLWNBC administrative area.

Identified in the Fenland Local Plan (2014) as part of the East Wisbech (strategic allocation)

provided by Policy LP8 – Wisbech confirms:

"this area is identified on the Policies Map and is proposed to be of a predominantly residential nature.

Prior to the consideration of detailed planning applications, a broad concept plan for the area will need to be agreed jointly by both Fenland District Council and Kings Lynn and West Norfolk Borough Council (KLWNBC). Indicatively, around 900 dwellings should come forward in the Fenland area and 550 dwellings in the KLWNBC area (with the final latter figure to be determined via the KLWNBC Site Specific Key Site Boundary Allocations and Policies Local Plan).

Proposed access(es) to serve the development must ensure that there is no unacceptably net adverse impact on the local and strategic highway network and on existing residential amenity. This will require a significant upgrade to the junction of the A47 with Broad End Road (within the KLWNBC area), probably in the form of a new roundabout, with the arrangements for delivering such upgrade being agreed as part of the broad concept plan for the allocation. Existing areas of high quality woodland, including some mature orchards, and the disused railway should be retained and enhanced to serve as multifunctional public open space areas with amenity, biodiversity and community food value."

To not continue the allocations on the eastern edge of Wisbech by the Council, it is submitted, is contrary to the principles of sustainable development.

4. The Settlement Hierarchy confirmed in the draft Local Plan (LP1) that Wisbech is a top tier settlement where at:

7.2 The spatial strategy makes provision for housing growth in a wide variety of places

LP2: Spatial Strategy for the Location of Residential Development

across the district, with particular emphasis on the four market towns of Chatteris, March, Whittlesey and Wisbech.

7.3 As the main population centres, the market towns provide opportunities for new development in locations with good access to employment, retail, education, transport, leisure and community facilities.

It is also confirmed at paragraph 7.14 that

7.14 Wisbech, the district's largest population centre, provides a range of employment opportunities, notably in food processing industries, manufacturing, logistics and storage, with good access to the A47. The town has an inland port which provides economic opportunity and is already identified as an area for regeneration.

Policy LP2: Spatial Strategy for the Location of Residential Development reinforces that

"this local plan focuses the majority of new residential development in and around Fenland's four market towns...."

But, is then contradictory in that limited growth is allocated to Wisbech (12%) contrary to the principle of sustainable development to allocate growth to the most sustainable settlements. Policy LP2 seeks to provide a higher percentage, for example, to "medium" villages (14%) and "windfall" development (14%).

5. The allocation in the adopted Local Plan if continued will provide housing at a highly sustainable location including important infrastructure and the provision of a new primary school and a community hub/local centre which therefore is contrary to the principles of sustainable development, to not continue the allocation.

6. It appears from the Site Evidence Report contained in the draft Local Plan evidence that a decision was made to exclude the proposed allocations on the eastern edge of Wisbech on the basis of the absence of evidence of progress made.

It is not unusual for lead in times in the development of urban extensions to be extended due to a complex of issues in resolving technical constraints, resolving contractual issues and in securing Officer engagement to secure all necessary consents. In this case, the majority of the potential technical constraints and attendant contractual issues have been resolved and the only obstacle to delivery is in the provision of all necessary consents.

In this regard, Seagate Homes, the site developer, have submitted a planning application relating to:

Land to the East of Stow Lane. Hybrid Application: Outline application with matters committed in respect of access to erect of up to 224 x dwellings, and Full application to erect 101 x 2-storey dwellings (7 x 1-bed, 24 x 2-bed, 45 x 3-bed and 25 x 4-bed) with associated parking, landscaping, public open space, and a new access off Sandy Lane. Planning reference F/YR22/0844/O.

It is also understood that other adjoining land owners/promoters are engaged in pre-application discussions with the Council and/or are submitting planning applications.

7. Urban extensions/NPPF

Sustainable urban extensions present an opportunity to deliver sustainable development whereby residential development is served by the necessary services, facilities, infrastructure, and employment opportunities to sustain a community. This approach is endorsed by national policy that

LP2: Spatial Strategy for the Location of Residential Development

73. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).

8. Development Plan/Broad Concept plan/phasing

a) Policy LP7 – Urban Extensions confirmed that an agreed Broad Concept Plan (hereinafter referred to as the “BCP”) should be adopted which it was after public consultation in May 2018. The proposals coming forward should be judged in the light of the BCP being adopted in May 2018.

b) The area has an adopted BCP and development is now being delivered in this area in accordance with this BCP. The Council indicate rightly that the urban extension be phased rather than, as was previously considered, the requirement for a single application for the whole of this significant application. That the requirement for a single planning application was acting as an impediment to delivery rather than the (now) phased approach which is acting as a catalyst for delivery.

Delivery will therefore now be achieved in the early plan period as a result of the current and other applications for the majority of the area which will be determined under the current Local Plan policies.

9. Flood Plain/Sequential Test

The Environment Agency’s Flood Map for Planning indicates the Site and the wider area to be located almost entirely within Flood Zone 1. It is important that it is only the eastern edge of Wisbech that is not constrained by flood risk “issues” and therefore development should be allocated accordingly.

10. Duty to co-operate

The duty to co-operate is important and is set out in the Framework (reference Appendix 3 Inset F3 Wisbech Fringe).

24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.

26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

It is submitted that the Council by not continuing the allocations on the eastern edge of Wisbech (the Borough Council wish to maintain their allocation) is contrary to the duty to co-operate with each other.

11. Conclusions

There is clearly now a firm intention to deliver the development proposals for housing and

LP2: Spatial Strategy for the Location of Residential Development

community facilities located on the eastern edge of Wisbech.

The draft Local Plan confirms that Wisbech is in the top tier of the settlement hierarchy. The draft Local Plan is considered unsound because it proposes to allocate limited growth to Wisbech, which being a top tier settlement, should be allocated significant growth and particularly that the proposals provide for infrastructure and community facilities, such as a primary school, a local centre and also the provision of a Care Home and accommodation for the elderly.

LP2: Spatial Strategy for the Location of Residential Development

Title:

Position:

First Name: Richard

Organisation: Richard Brown Planning Limited

Surname: Brown

Comment

Object

These Representations are submitted in response to the consultation relating to the Fenland District Council draft Local Plan 2021-2040.

2. Prosperity Wealth and Developments Limited (hereinafter referred to as “Prosperity”) are the promoters and developers of the site (hereinafter referred to as the “site”) at Sandy Lane Wisbech, which is shown edged red on drawing number 22031-GNA-MP-ST-DRA-0103 (attached as Appendix 1), and have submitted a hybrid planning application for Full planning permission for the erection of 325 dwellings with access off Sandy Lane, highways layout, public open space, landscaping and associated infrastructure. Outline planning application for a Community Hub/local centre comprising convenience store 300m², other retail/services/health 200m², parking/servicing, play areas/open space, 60 bedroom care home/extra care accommodation and C3 residential development with all matters reserved apart from access.

3. Prosperity object to the referenced policies LP2, LP35 and LP36 for the following reasons:

a) The draft Local Plan in omitting to continue the allocation of the wider site area on the eastern edge of Wisbech as is contained in the adopted Local Plan 2014, Policy LP8.

b) The majority of the Site lies within Fenland District Council and part within Kings Lynn and West Norfolk Borough Council (hereinafter referred to as “the Borough Council”) identified at F3 Wisbech Fringe (Appendix 3). The adopted Local Plan for Fenland District Council comprises the Fenland Local Plan (adopted 2014).

c) The Fenland Local Plan 2014 Policies Map confirms the Site is identified as forming part of a strategic urban extension (Policy LP8). The supporting text to Local Plan Policy LP8 confirms

The two Councils are working towards agreeing a single development allocation which straddles the administrative boundary.

The allocation will comprise the whole of the land to the east of Wisbech as identified on the Key Diagram and the Policies Map, plus additional adjoining land to the east and/or south of that land as falling in the KLWNBC administrative area.

Identified in the Fenland Local Plan (2014) as part of the East Wisbech (strategic allocation) provided by Policy LP8 – Wisbech confirms:

"this area is identified on the Policies Map and is proposed to be of a predominantly residential nature.

Prior to the consideration of detailed planning applications, a broad concept plan for the area will need to be agreed jointly by both Fenland District Council and Kings Lynn and West Norfolk Borough Council (KLWNBC). Indicatively, around 900 dwellings should come forward in the Fenland area and 550 dwellings in the KLWNBC area (with the final latter figure to be determined via the KLWNBC Site Specific Key Site Boundary Allocations and Policies Local Plan). The proposed access(es) to serve the development must ensure that there is no unacceptably net adverse impact on the local and strategic highway network and on existing residential amenity. This will require a significant upgrade to the junction of the A47 with Broad End Road (within the KLWNBC area), probably in the form of a new

LP2: Spatial Strategy for the Location of Residential Development

roundabout, with the arrangements for delivering such upgrade being agreed as part of the broad concept plan for the allocation. Existing areas of high quality woodland, including some mature orchards, and the disused railway should be retained and enhanced to serve as multifunctional public open space areas with amenity, biodiversity and community food value."

d) Part of the site lies within Kings Lynn and West Norfolk Borough Council administrative area.

In the 'Site Allocations and Development Management Policies Plan' (adopted 2016) policy F3.1 is the policy for the Wisbech Fringe - Land east of Wisbech (west of Burrowgate Road) states (in which the site is located):

'Land to the east of Wisbech (approximately 25.3 hectares), as shown on the Policies Map, is allocated for 550 dwellings,'

e) The Fenland Local Plan (adopted 2014) contains the policies and locations for the growth and regeneration of Fenland over the plan period of 20 years. Wisbech is the largest settlement in Fenland and as confirmed in Policy LP8 is the main focus for housing, employment and retail growth.

f) Local Plan Policy LP8 confirms that growth will be supported through the provision of new urban extensions to Wisbech and provides for a strategic allocation at East Wisbech and broad locations for growth to the south and west of Wisbech and the Nene Waterfront and Port. The site is identified within the East Wisbech strategic allocation.

To not continue the allocations on the eastern edge of Wisbech by both the Council and Borough Council, it is submitted, is contrary to the principles of sustainable development.

4. The Settlement Hierarchy confirmed in the draft Local Plan (LP1) that Wisbech is a top tier settlement where at:

7.2 The spatial strategy makes provision for housing growth in a wide variety of places across the district, with particular emphasis on the four market towns of Chatteris, March, Whittlesey and Wisbech.

7.3 As the main population centres, the market towns provide opportunities for new development in locations with good access to employment, retail, education, transport, leisure and community facilities.

It is also confirmed at paragraph 7.14 that

7.14 Wisbech, the district's largest population centre, provides a range of employment opportunities, notably in food processing industries, manufacturing, logistics and storage, with good access to the A47. The town has an inland port which provides economic opportunity and is already identified as an area for regeneration.

Policy LP2: Spatial Strategy for the Location of Residential Development reinforces that "this local plan focuses the majority of new residential development in and around Fenland's four market towns...."

But, is then contradictory in that limited growth is allocated to Wisbech (12%) contrary to the principle of sustainable development to allocate growth to the most sustainable settlements. Policy LP2 seeks to provide a higher percentage, for example, to "medium" villages (14%) and "windfall" development (14%).

LP2: Spatial Strategy for the Location of Residential Development

5. The allocation in the adopted Local Plan if continued will provide housing at a highly sustainable location including important infrastructure and the provision of a new primary school and a community hub/local centre which therefore is contrary to the principles of sustainable development, to not continue the allocation.

6. It appears from the Site Evidence Report contained in the draft Local Plan evidence that a decision was made to exclude the proposed allocations on the eastern edge of Wisbech on the basis of the absence of evidence of progress made.

It is not unusual for lead in times in the development of urban extensions to be extended due to a complex of issues in resolving technical constraints, resolving contractual issues and in securing Officer engagement to secure all necessary consents. In this case, the majority of the potential technical constraints and attendant contractual issues have been resolved and the only obstacle to delivery is in the provision of all necessary consents.

In this regard, Prosperity have now submitted a planning application relating to the site for Full planning permission for the erection of 325 dwellings with access off Sandy Lane, highways layout, public open space, landscaping and associated infrastructure. Outline planning application for a Community Hub/local centre comprising convenience store 300m², other retail/services/health 200m², parking/servicing, play areas/open space, 60 bedroom care home/extra care accommodation and C3 residential development with all matters reserved apart from access.

It is also the case that Seagate Homes, the adjoining site developer, has submitted a planning application relating to:

Land to the East of Stow Lane. Hybrid Application: Outline application with matters committed in respect of access to erect of up to 224 x dwellings, and Full application to erect 101 x 2-storey dwellings (7 x 1-bed, 24 x 2-bed, 45 x 3-bed and 25 x 4-bed) with associated parking, landscaping, public open space, and a new access off Sandy Lane. Planning reference F/YR22/0844/O.

It is also understood that other adjoining land owners/promoters are engaged in pre-application discussions with the Council and/or are submitting planning applications.

7. Urban extensions/NPPF

Sustainable urban extensions present an opportunity to deliver sustainable development whereby residential development is served by the necessary services, facilities, infrastructure, and employment opportunities to sustain a community. This approach is endorsed by national policy that

73. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).

8. Development Plan/Broad Concept plan/phasing

a) Policy LP7 – Urban Extensions confirmed that an agreed Broad Concept Plan (hereinafter referred to as the “BCP”) should be adopted which it was after public consultation in May 2018. The proposals coming forward should be judged in the light of the BCP being adopted in May 2018.

LP2: Spatial Strategy for the Location of Residential Development

The area has an adopted BCP and development is now being delivered in this area in accordance with this BCP. Both Councils indicate rightly that the urban extension be phased rather than, as was previously considered, the requirement for a single application for the whole of this significant application. That the requirement for a single planning application was acting as an impediment to delivery rather than the (now) phased approach which is acting as a catalyst for delivery.

Delivery will therefore now be achieved in the early plan period as a result of the current and other applications for the majority of the area which will be determined under the current Local Plan policies.

Flood Plain/Sequential Test

The Environment Agency's Flood Map for Planning (attached as Appendix 2) indicates the Site and the wider area to be located almost entirely within Flood Zone 1. There is small part of the site to the northeast which falls within Flood Zone 2 on and adjacent to Burretgate Road associated with the adjacent IDB watercourse. It is important that it is only the eastern edge of Wisbech that is not constrained by flood risk "issues" and therefore development should be allocated accordingly.

10. Duty to co-operate

The duty to co-operate is important and is set out in the Framework (reference Appendix 3 Inset F3 Wisbech Fringe).

24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.

Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

It is submitted that the Council by not continuing the allocations on the eastern edge of Wisbech (the Borough Council wish to maintain their allocation) is contrary to the duty to co-operate with each other.

11. Conclusions

With the two planning applications submitted to the Council and the Borough Council by Prosperity and by Seagate Homes, the adjoining developer, there is clearly now a firm intention to deliver the development proposals for housing and community facilities located on the eastern edge of Wisbech.

The draft Local Plan confirms that Wisbech is in the top tier of the settlement hierarchy. The draft Local Plan is considered unsound because it proposes to allocate limited growth to Wisbech, which being a top tier settlement, should be allocated significant growth and particularly that the proposals provide for infrastructure and community facilities, such as a primary school, a local centre and also the provision of a Care Home and accommodation for the elderly.

LP2: Spatial Strategy for the Location of Residential Development

Title:	Mr	Position:	Clerk
First Name:	Dave	Organisation:	Christchurch Parish Council
Surname:	Gibbs		

CommentObject

The Parish Council considered the Draft Local Plan at their meeting on 10 October and have a number of concerns regarding the potential impact of the plan on life in Christchurch.

The restrictive nature of the new proposed settlement boundary (Inset 03) and the scarcity of available sites for future development will stifle the natural growth that is necessary for the long-term sustainability of the village. This is unacceptable. Paragraph 6.7 of the Draft Plan addresses this issue succinctly, thus: “However, it is also recognised that smaller communities should benefit from an appropriate level of growth to ensure their long-term sustainability.” Whilst at first sight the proposed settlement boundary includes four potential sites for residential development, legal hurdles and contamination may prevent two of those sites from being delivered.

The Parish Council wishes 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. A more flexible approach to the settlement boundary is required and the Parish Council is keen to work with officers to consider all options to facilitate this.

In order to address the Council’s concerns, members request that a senior planning officer visits Christchurch to discuss the draft proposals in more detail and to consider site-specific issues within the general policies and the new hinterland provisions to provide the Parish Council with the clarity to advise residents and to fulfil its statutory obligation as a consultee on future applications.

LP3: Spatial Strategy for Employment Development

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

Comment **Object**

The Doddington Neighbourhood Plan Group considers that the allocation of new employment sites across Fenland is at odds with the housing growth strategy such that there is in fact no spatial relationship between the two.

The logic for this is not set out within the plan nor any accompanying evidence.

For example the proposed employment allocation in Wisbech is 42% of the supply requirement whereas Wisbech is due to accommodate only 12% of new housing under Policy LP2.

In light of the Group’s comments in respect of Policy LP2 the whole spatial strategy of the Plan is not sound as it is neither justified not consistent with national policy as it seeks to place development in unsustainable locations which have limited access to employment and services.

Title: **Position:** Senior Planner
First Name: Reiss **Organisation:** Marrons Planning
Surname: Sadler

Comment **Support**

LP3 sets out the spatial strategy for new employment land, with the focus on the market towns. The distribution is supported in principle, and the potential for Chatteris to accommodate two broad locations is recognised.

LP3: Spatial Strategy for Employment Development

Title:		Position:	
First Name:	Jack	Organisation:	Amherst Limited
Surname:	Gervaise-Brazier		

Comment **Neutral**

Proposed Employment Allocation – see attached plan.

This site is located directly north of Eastrea Road, Whittlesey and surrounded by allocation LP43.03. Allocation LP43.01 directly south although now allocation for residential use was previously recently granted planning permission for a business park with employment uses, which demonstrates that this general location is suitable for employment land. The proposal to allocate this new site for employment acts to replace that which was previously granted planning permission and has since replaced by residential uses.

At Para. 7.11 The Council’s business plan states one of its priorities is to ‘attract new business, jobs and opportunities whilst supporting our existing businesses in Fenland’. Taking into account the CPCA’s ambition to ‘double economic output across Cambridgeshire and Peterborough by 2040’ it is proposed that the new Local Plan should take a much more flexible and facilitative approach to economic growth by allocating significantly more employment land and allowing more windfall opportunities.

Policy LP3 The employment growth strategy will be principally focused on the market towns of Wisbech, March, Chatteris and Whittlesey. However, Whittlesey only has an allocation of 6% of the total employment land allocated in the district and more employment land should be allocated.

With reference to para. 7.19 Peterborough has a considerable influence on Whittlesey in terms of employment and in recent years growth in employment in Fenland has not match workforce expansion as a result out commuting is high with half of Fenland’s residents commuting out of the district to work.

LP3: Spatial Strategy for Employment Development

Title:		Position:	
First Name:	Victoria	Organisation:	Barton Willmore
Surname:	Yeandle		
Comment	Support		
Metalcraft strongly supports the Policy.			
As the Policy states, the employment growth strategy will be principally focused on the market towns. As Chatteris is one of the market towns, it is sensible that it seeks to accommodate approximately 24% of the total employment need for FDC in the Plan Period.			
Metalcraft welcomes the inclusion of the proposed Metalcraft site as part of the total available employment land for Chatteris (51.59 hectares). The proposed Site at Metalcraft can produce high quality E(g), B2 and B8 uses, benefitting from both the existing Metalcraft operations, which is considered an “anchor” business (Chatteris: Aspirational Community: Final Report), to attract smaller companies, particularly looking to tie into the manufacturing process here.			
The recently approved North Cambridgeshire Training Centre (NCTC), will also provide an attraction for the future businesses at the scheme. The Chatteris: Aspirational Community: Final Report states that the companies can create a dense web of supply chains, to create an innovation ecosystem here, increasing efficiency, creating jobs and raising the profile of the town.			
Metalcraft supports this Vision and is fully committed to work with FDC and other stakeholders to deliver it.			

LP3: Spatial Strategy for Employment Development

Title:

Position:

First Name: Richard

Organisation: Richard Brown Planning Limited

Surname: Brown

Comment **Support**

Our client, Elmside Limited, is the freehold owner of the land to the south of March Trading Estate (hereinafter referred to as “the site”), as identified on the site location plan enclosed.

The site is located to the north west of March, and more specifically to the south of the established March Trading Estate. The site abuts the Tesco superstore and various other commercial land uses and residential development to the south, with the railway line between.

The site is well connected to public transport, both with proximity to buses and March Railway Station is approximately 1.2km to the south east of the site providing train services on the Stanstead-Cambridge-Leicester-Birmingham line.

Elmside Limited have entered into arrangements with Eastwood RVL March Limited who are bringing forward proposals for development of the site to deliver modern flexible work space which will contribute to new employment opportunities for local people at a highly sustainable location.

We are pleased that the Council have identified the site for employment development under site allocation LP40.01 March Trading Estate, and Elmside Limited fully support the proposed allocation.

Support:

I support the above referenced policy/paragraph/site because:

Our client, Elmside Limited, is the freehold owner of the land to the south of March Trading Estate (hereinafter referred to as “the site”), as identified on the site location plan enclosed.

The site is located to the north west of March, and more specifically to the south of the established March Trading Estate. The site abuts the Tesco superstore and various other commercial land uses and residential development to the south, with the railway line between.

The site is well connected to public transport, both with proximity to buses and March Railway Station is approximately 1.2km to the south east of the site providing train services on the Stanstead-Cambridge-Leicester-Birmingham line.

Elmside Limited have entered into arrangements with Eastwood RVL March Limited who are bringing forward proposals for development of the site to deliver modern flexible work space which will contribute to new employment opportunities for local people at a highly sustainable location.

We are pleased that the Council have identified the site for employment development under site allocation LP40.01 March Trading Estate, and Elmside Limited fully support the proposed allocation.

The overarching spatial vision for the Local Plan is intended to guide growth to 2040. Elmside Limited fully support the spatial vision which recognises the need for economic growth including delivery of approximately 18,000 new jobs to meet the needs of the local community.

Elmside Limited fully support the sites allocation for non-residential development as set out under Policy LP40 and site allocation LP40.01 March Trading Estate.

The allocation builds on the current broad location for growth allocation in the Local Plan and secures the opportunity for the site and the wider area to deliver a significant amount of new employment floor space which is a logical

LP3: Spatial Strategy for Employment Development

extension to the March Trading Estate.

Policy LP3 reiterates the Council’s proposed allocation of 225 hectares of employment land focused towards the Market Towns, where March is contributing 25% of the Districts employment land requirements.

Elmside Limited fully support the spatial strategy for employment development, including the specified land uses of classes B2, B8 and E(g).

It is also noted that Policy LP15 specifies locations that proposals for new employment development should normally be located including at sites allocated for employment use.

The proposed allocations as indicated above are supported. The Council has a long standing aspiration to focus employment growth towards the Market Towns and this part of March noting the good connections to existing businesses, public transport links, existing and emerging communities and the road network.

Title:		Position:	
First Name:	Rob	Organisation:	Savills
Surname:	Morgan		
Comment	Support		
Employment			

Policy LP3 reiterates the Council’s proposed allocation for 225 hectares of employment land focused towards the market towns. March is earmarked to provide 25% of the district’s employment land requirement. We support the spatial strategy for employment development, including the specified land uses of Classes B2, B8 and E(g).

Policy LP15 specifies locations that proposals for new employment development should normally be located, including at sites allocated for employment use. We support the focus of employment development towards the relevant employment site allocations. However, it is considered that the policy may go further to encourage the optimisation of such sites to maximise the delivery of employment floorspace.

LP3: Spatial Strategy for Employment Development

Title:		Position:	
First Name:	Natalie	Organisation:	Huntingdonshire District Council
Surname:	Elworthy		
Comment	Object		
<p>Fenland’s employment challenges are recognised including the difficulty of attracting higher value employment into the district to promote a more diverse successful local economy. The spatial strategy for employment development set out in Policy LP3 Spatial Strategy for Employment Development is supported as focusing the majority of growth within the four market towns and thereby promoting opportunities to reduce the need to travel along with limited employment growth in villages and the countryside reflecting the high proportion of businesses associated with agriculture and food processing. It is noted that the 225ha of employment land proposed through policy LP3 meets Fenland’s identified need for employment land in full. Therefore, HDC considers it necessary to express significant concern 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. The broad locations have potential to detrimentally impact on employment growth aspirations in the north-eastern part of Huntingdonshire, particularly at the market town of Ramsey. HDC is currently investing significant efforts into preparing the Ramsey Implementation Masterplan and would not wish to see these negatively impacted upon by delivery of additional growth aspirations substantially over and above identified need in Fenland. However, should the approach remain, the detailed proposals in Policy LP45 An Aspirational Community for the requirement for master plans for each of the broad locations for employment growth is supported.</p>			
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LP3: Spatial Strategy for Employment Development

Title:		Position:	Senior Planner
First Name:	Reiss	Organisation:	Marrons Planning
Surname:	Sadler		

Comment Object

Land south of Chatteris

Land south of Chatteris is therefore promoted by HLM for allocation in the Fenland Draft Local Plan. The site can deliver circa 500 dwellings, land for community benefits (at this stage it is suggested a new Health Hub incorporating new healthcare and extra care facilities subject to local needs and aspirations), significant green infrastructure and open space, and associated uses and development. This would complement but also support delivery of the first phase of the scheme to the north, which includes significant community infrastructure notably a Southern Bypass connecting Ireton's

Way and London Road, land and funding towards the provision of a new primary school, a local centre, and community space.

Appended to these representations is a Vision Document which introduces the proposal, describes its potential benefits, and sets out an illustrative masterplan setting out how the development could come forward. Also appended are a supporting Heritage Technical Note, Transport and Drainage Appraisal, Landscape and Visual Appraisal, and Preliminary Ecological Appraisal. The key elements to note regarding the proposal are as follows:

Land south of Chatteris would deliver circa 500 new dwellings, of which 20% would be affordable to meet local needs in line with emerging policy. This will provide a range of housing including family homes and bungalows, which are identified as being needed in the town by the local community¹⁸, and will help to meet the growing housing needs of Chatteris and the wider Fenland District in the Plan period to 2040.

Health Hub

Land south of Chatteris would include land for community use. At this stage, it is proposed to make provision for land for a new Health Hub, incorporating new healthcare and extra care facilities. This will allow providers to expand the existing GP Surgery provision in the town which is currently at capacity and identified by local residents as a significant issue. It would also support the provision of a NHS-run dentist in the town for which there is no existing provision and is also identified by local residents as a significant issue¹⁹, and could also support the provision of an extra care facility to support Chatteris' ageing population.

Chatteris Link Road

Land south of Chatteris can assist in the facilitation of the delivery of a western link road connecting the A141 and London Road, through improvements and provision of an appropriate connection point on London Road and funding towards its delivery. The completion of the Chatteris Ring Road is a long-standing aspiration of the Town Council and is supported by local residents, and will significantly reduce the amount of through traffic thus improving the public realm and local environment.

Green Infrastructure and Open Space

Land south of Chatteris includes a significant amount of Green Infrastructure provision equating to more than 50% of the total site area. This supports a well-designed and walkable community, and incorporates Sustainable Urban Drainage Systems and delivery of Biodiversity Net Gain through enhancement of locally distinctive habitats. The proposal also has the ability to improve pedestrian and cycle connections in the wider area, and create a new link between Dean Drove and Horsely Fen Drove for recreation.

Economic Benefits

LP3: Spatial Strategy for Employment Development

Land south of Chatteris will support the local economy through the provision of new jobs in the construction phase, the provision of new homes for local employees, and increased local spend in the town centre.

Environmental Effects

The land is free of any significant constraints that preclude development, such as areas of flood risk, archaeological potential, or ecological assets. Its development would also cause no harm to the setting of any heritage assets, and limited harm to the wider landscape of the town.

Title:	Ms	Position:	Chair
First Name:	Ruth	Organisation:	Doddington Parish Council
Surname:	Hufton		

Comment	Object
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Employment in Doddington is limited, most residebnts travel to work in cities and towns. We will become a dormitory for the main areas of employment. There is no remployment land designated to Doddington within the emerging local plan.

LP3: Spatial Strategy for Employment Development

Title:	Mr	Position:
First Name:	Stephen	Organisation:
Surname:	Rice	

Comment Object

refer to the attached drawing, reference WSTP-X-1-002 dated 04/10/2022.

The site to which I refer is identified edged red on the attached drawing. The land is in single ownership. Redevelopment of the site is therefore deliverable as there are no land assembly issues to overcome. The site which is located immediately to the south of the A605, immediately to the north of the Peterborough to Whittlesey railway line and immediately to the west of the town of Whittlesey comprises the former Victory Brickworks and part of the former Saxon Brickworks.

The site was previously used for the construction of bricks, production ceased in 2011 and since then most of the site has been restored to level hardstanding and is ready for redevelopment.

It was not possible to make any representations on the former Victory Works site during the previous call for sites in 2019 and 2020 as the current owners did not complete the purchase of the site until 2021.

The entire site totals approximately 34 hectares of which 18 hectares, the majority of which is located on the former Victory Works on the western end of the site is level and suitable for redevelopment and reuse for employment purposes. This area is coloured pink.

The remainder of the site lying to the east immediately adjacent to the town of Whittlesey is allocated for landscaping and biodiversity enhancement. This area is coloured green.

Footpath and cycling access will also be created through the green area to provide a sustainable means of access directly from Whittlesey Town to the main employment areas in the centre and to the west of the site.

Vehicular access will be taken directly from the A605. There are currently two vehicular accesses into the site, the proposal is to close both of these and to construct a new access complete with either a priority right turn or mini roundabout, subject to agreement with Highways.

Planning permission has been sought on 4 hectares of the site for change of use to industrial (B2 and E classes). The permitted site will be occupied by Mace Tech, part of the Mace Group and will provide up to 100 new jobs. A decision is pending, there are no objections from Statutory Consultees, including the Town Council.

There is a former clay pit on part of the site. An application is being prepared for submission to Cambridgeshire County Council for the restoration of the pit to ground level. Once this is restored to ground level, none of the developable site would lie within the functional flood plain.

The developers have completed a number of base line assessments to inform a planning application for redevelopment of the site for a Science and Technology park (Use Class E(g)). A Phase 1 Contamination Assessment has been completed and confirms the site is not contaminated, an Ecological Assessment has also been undertaken including eDNA tests for newts. There are no newts or other ecological constraints that would prevent redevelopment and reuse.

The application for the redevelopment of the 4 Ha for Mace Tech includes a surface water drainage strategy that is SuDS compliant. This has been considered by the LLFA who have confirmed they have no objections to the scheme. This drainage scheme would be expanded to provide a SuDS compliant drainage scheme for the entire site.

The site is well served by an existing utility infrastructure. There is an electricity substation onsite and a foul sewer pumping station immediately adjacent.

The brownfield site is located in a sustainable location and would be able to provide valuable employment space for the district within (subject to planning) a period of 2-3 years. The proposal is to construct up to 100,000m³ of

LP3: Spatial Strategy for Employment Development

commercial space for offices and laboratories. This has the potential to deliver up to 2,500 high quality skilled jobs onsite.

As the developers were not in a position to make representations during the previous call for sites, it was not possible for the LPA to assess this site as such this site has not been included in policies LP3 or LP44.

We believe that subject to further evaluation, this site should be included under both policies.

Whittlesey is the 3rd largest settlement in Fenland with a larger population than Chatteris. It also has a railway station and good public transport links to Peterborough and beyond. However, in the Table under Policy LP3, it's potential supply of employment land is only 6% of the total available in the Fenland district. Our proposal to include the part of the former Saxon and the whole of the former Victory Works would deliver a further 18 Ha of developable land. This would increase the total for Whittlesey to 27.71 Ha representing 11.4% of the total. Although this is still lower than the areas allocated for Wisbech, March and Chatteris, this area would be more in line with the likely demand for employment land for Whittlesey.

The proposed site is extremely well placed to deliver high quality employment space in compliance with both National and Local policies. It benefits from the following.

The brownfield site which is in single ownership does not require de-contamination and is ready for immediate redevelopment.

The new Science and Technology Park to be located on the site is being designed to be Carbon Neutral. It will incorporate a range of renewable energy technologies, including ground source heat and solar. It will be of the highest quality design to attract international companies to the Science Park.

It is highly accessible with the A605 immediately adjacent and dedicated foot/cycle and electric vehicle routes incorporated allowing access directly from Whittlesey without the need to use the A605. Extensive areas of green open space for amenity and biodiversity enhancement form part of the scheme design. Existing woodland will be maintained and managed.

A surface water drainage scheme designed to be fully SuDS compliant will incorporate water recycling and a new network of surface water dykes/drains to replicate the Fenland landscape which is fundamental to the overall design of the Science Park These will drain into the Kings Dyke via an existing reedbed.

Solar panels over the car parking areas will provide renewable electricity for the EV charging points. It is anticipated that the majority of users will use EV's with this helping to improve local air quality. Due to the nature of the businesses occupying Science Parks elsewhere such as Cambridge, very few HGV movements are anticipated.

We believe this site should be included under policies LP3 and LP44.

8: Securing Fenland's Future

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

It is recommended that the addition of an additional bullet point is added to this paragraph:

- “Reducing the amount and environmental impact of waste produced”

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

This section should include a reference to the Future Fens baseline report (Future Fens - Flood Risk Management - Association of Drainage Authorities (ada.org.uk)) and the Future Fens Integrated Adaptation Project (FF:IA) (Future Fens: Integrated Adaption (anglianwater.co.uk)) – both of these highlight the future challenges for the fens landscapes in terms of climate resilience. The delivery of the FF:IA manifesto should be included within Policy LP4: Securing Fenland’s Future.

Title:		Position:	
First Name:	Lynda	Organisation:	
Surname:	Warth		
Comment	Object		

Sustainable Development
Para 8.2

'To achieve sustainable development, policies within this Plan must secure development that meets the current needs of the district without compromising future generations. Ensuring that new development is sustainable will help to secure Fenland’s future: at the heart of the growth strategy for Fenland is a desire to deliver growth that is not for its own sake, but growth that brings benefits to all sectors of the community now and in the future. All policies in this Plan have been tested against the Local Plan Sustainability Appraisal objectives to ensure that the plan meets these requirements (see Section 4).'

Failure to protect and enhance the rights of way network will deny future generations access to the countryside as of right. The RoW network is a wonderful, free amenity enabling residents to be in the countryside enjoying the well documented mental and physical benefits of exercising in the open. The RoW network is part of an area’s sustainability.

8: Securing Fenland's Future

Title:		Position:	Executive Assistant - Place & Sustainabil
First Name:	Carole	Organisation:	Cambridgeshire Local Access Forum - Ca
Surname:	Hutton		

Comment Neutral

The Cambridgeshire Local Access Forum (CLAF) was established through the statutory provisions of the Countryside and Rights of Way Act 2000 and its remit is to advise relevant bodies as defined in Section 94(4) of the Countryside and Rights of Way Act 2000 on matters relating to access to the countryside. Section 94(4) bodies are required by the legislation to take the views of the Local Access Forum into account.

The Cambridgeshire LAF welcomes this opportunity to provide input into the Draft Fenland Local Plan and how it might be revised and improved to better reflect the existing and potential future use of the non-motorised transport network across Fenland area.

We recognise that it's a very comprehensive plan, with a lot of concern for biodiversity, historical sites, and conservation. We are also pleased to see and support policies that aim to protect, enhance and develop the rights of way network providing a network of routes to promote walking, cycling and riding and to point out that circular routes, or routes that link with others, are particularly recommended. We would like to comment specifically on Section 8.2, that rights of way network are very much part of the fenland area sustainability, as so stated in the Policy LP29, Green Infrastructure should be applied retrospectively, as noted in 8.3 to reduce the reliance on the car and encouraging walking and cycling.

Active travel provision should include horse riders and support the Fenland equestrian industry, which is not inconsiderable, and to meet the requirements of the Cambridgeshire Rights of Way Improvement Plan (ROWIP), the changes to the Highway Code and the road-user hierarchy. Wherever feasible, bridleways and byways in the countryside should be the preferred option, to enable the widest usage for non-motorised users – carriage drivers, horse riders, cyclists and pedestrians.

The proposed new reservoir, north of Chatteris, will provide fresh opportunities for routes around the edge as at Grafham Water, making sure that any routes cut off by the water are reinstated in nearby areas We would ask them to give high importance to access to open green space, public footpaths and bridleways, so that the highest possible quality of life is ensured for the future. The Fenland Plan recognises that the District’s walking and cycling infrastructure is limited or entirely absent. You have acknowledged that the public rights of way (PROW) including useable horse-riding routes are less well developed than in other parts of Cambridgeshire and that public footpaths often do not connect to anywhere.]

Whilst you do acknowledge the health-giving benefits of a good network and note that you will protect the existing network and seek to enhance it by permissive pathways and additional cycle and horse-riding routes. You have also noted that the amount of accessible and usable open space available per head of population is below the national standard and that you will seek to maintain and improve the existing green infrastructure network in Fenland by enhancing, creating and managing multi - functional green infrastructure, within, around, and between settlements, that are well connected to each other and the wider countryside. The CLAF would be happy to discuss further our concerns and how we might resolve these issues.

LP4: Securing Fenland’s Future

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

Comment **Neutral**

We welcome that proposals will need to clearly demonstrate how they will achieve the emission minimisation, climate change mitigation and adaptation and other environmental requirements of the relevant Plan policies. This is subject to those policies, and site allocation policies, including robust environmental requirements, particularly in relation to air quality emissions, water efficiency standards, BNG and accessible natural greenspace. 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.

LP4: Securing Fenland's Future

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

Comment Object

Whilst we welcome the recognition that Policy LP4 seeks to address climate change mitigation and adaptation we consider there is a real opportunity to set out the overarching measures that will underpin the Council's approach to meeting net zero carbon, including where the Local Plan is able to influence the nature and distribution of development to ensure sustainable and resilient communities over the longer term.

We are disappointed that The Future Fens: Integrated Adaptation (FF:IA) project has not been referenced in the Local Plan, particularly in relation to this policy and wider plan objectives. Paragraph 8.7 specifically identifies the challenges and risks of a changing climate for the Fenland landscape but fails to acknowledge the FF:IA project – 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.

The strategic outcomes for the FF:IA project are:

1. An integrated water management solution as a collective vision
2. Unlocking sustainable economic growth alongside nature recovery
3. Adaptation and resilience to drought and flooding
4. Investment bringing much-needed certainty for the future
5. The pace of change required for delivery of major infrastructure
6. A multi-sector roadmap and convergence of strategies
7. Alignment to the Government's growth vision for the OxCam Arc
8. Shared international learning and experiences
9. Levelling Up this important region: enhancing quality of life
10. Alignment to regional mitigation actions

This is a landscape scale project across the Fenland region and promotes a collaborative place-based approach to climate change adaptation which will help to unlock economic growth, new housing projects and improved transport links, as well as benefiting nature and tourism. The Future Fens programme aims to enable the community to take control, adapting and becoming climate resilient.

FF:IA is an integrated, collaborative, and innovative stakeholder partnership with Anglian Water, Water Resources East, the Environment Agency and the Cambridgeshire and Peterborough Combined Authority as the main sponsors of this project. Fenland District Council is also a key stakeholder on the taskforce for the project. Given its strategic scale, and committed stakeholders, including businesses, we would request that the FF:IA project and its manifesto is embedded into the Local Plan as a sustainable approach to land use in the district, and most particularly in supporting the aims of Policy LP4 Securing Fenland's Future¹. See: (<https://www.anglianwater.co.uk/siteassets/household/in-the-community/future-fens-integrated-adaptation-manifesto-november-2021.pdf>)

Strategic Reservoir Options:

Anglian Water is working in partnership to develop proposals for two new reservoir systems which, together with flood management interventions, have the potential to transform opportunity in the Fens, delivering an integrated solution that addresses a combination of challenges and delivers a broad set of benefits across multiple sectors. Early concept design work on the reservoir systems includes additional flood storage areas, storage capacity for irrigation, and wetlands to enhance biodiversity. We are also exploring the opportunity to use open water transfers which would benefit navigation and tourism in the region.

The new Fens Reservoir will store more water, meeting the challenges of a changing climate and a growing population. It will mean less water is taken from sensitive sources, such as chalk streams, helping us to protect and restore the environment. Alongside meeting these challenges, the project presents significant social, economic, and environmental opportunities for communities across Fenland.

LP4: Securing Fenland's Future

Our vision for the project goes beyond just building a reservoir. We want to create a place where water, people and nature come together. That means creating space for wildlife, such as wetlands, alongside enabling new recreational and educational activities and natural places for people to explore. It also means creating new jobs and providing opportunities for local businesses and tourism.

Together, Anglian Water and Cambridge Water have undertaken a detailed site selection study to identify a proposed site for the reservoir. We have considered a wide range of factors as part of this study from people and communities, landscape and environment, engineering requirements, and many more. Through this process we have identified a best-performing site – one which balances all the factors we must consider, and that provides opportunities to unlock wider benefits.

Anglian Water has worked with Fenland District Council to provide information throughout the reservoir site selection process, and we will continue to engage with the Council and local communities as the scheme for the Fenland Reservoir progresses. The public consultation is currently underway for a 12-week period, until 21st December 2022 – details are available at www.fensreservoir.co.uk.

Title:		Position:	
First Name:	Victoria	Organisation:	Barton Willmore
Surname:	Yeandle		
Comment	Support		
Metalcraft supports the draft Policy.			

The proposed allocation can help achieve the policies of the National Planning Policy Framework (NPPF). Metalcraft is committed to work with FDC and other stakeholders to achieve the economic, social and environmental objectives.

The draft allocation will contribute towards the NPPF's economic objectives by providing high quality employment floorspace for the town, enhancing the economy of the area. The scheme also contributes towards the social objectives of the NPPF by providing high quality jobs.

The proposed approach also potentially includes for ancillary uses, such as hotel and public house. This will internalise trips, reducing the need for vehicular movements. Metalcraft is also willing to work with developers to design the buildings to reduce carbon emissions. In addition, the Vision Document details the landscaping which will contribute to the biodiversity net gain.

Title:	Mr	Position:	
First Name:	Colum	Organisation:	Cambridgeshire County Council
Surname:	Fitzsimons		
Comment	Neutral		
Policy LP4 should be strengthened in line with para 8.8 and 8.9, to explicitly refer to the requirement stated at paragraph 152 of the NPPF, 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.			

LP4: Securing Fenland’s Future

Title:		Position:	
First Name:	Lynda	Organisation:	
Surname:	Warth		
Comment	Object		
I support the comments made on behalf of the British Horse Society. Failure to protect and enhance the rights of way network will deny future generations access to the countryside as of right. The RoW network is a wonderful, free amenity enabling residents to be in the countryside enjoying the well documented mental and physical benefits of exercising in the open. The RoW network is part of an area’s sustainability. The rights of way network is important for delivering LP8, LP20, LP24, LP26, LP29, LP31. Provision of restricted byways is the most inclusive access and should be delivered wherever possible.			

Title:		Position:	
First Name:	Lynda	Organisation:	
Surname:	Warth		
Comment	Object		
'Policy LP4: Securing Fenland’s Future When considering development proposals, the Council will take into account the presumption in favour of sustainable development contained in the National Planning Policy Framework ²³ . It will seek to work proactively with developers and investors to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Proposals should clearly demonstrate how they will achieve the requirements for emission minimisation, climate change mitigation and adaptation to a changing climate required by various policies throughout this plan, including:			
<ul style="list-style-type: none">• LP6 - Renewable and Low Carbon Energy Infrastructure• LP7 - Design• LP8 - Amenity Provision• LP20 - Accessibility and Transport• LP24 - Natural Environment• LP25 - Biodiversity Net Gain• LP26 - Carbon Sinks and Carbon Sequestration• LP27 - Trees and Planting• LP29 - Green Infrastructure• LP31 - Open Space and Recreational Facilities• LP32 - Flood and Water Management• LP34 - Air Quality'			
The rights of way network is important for delivering LP8, LP20, LP24, LP26, LP29, LP31. Provision of restricted byways is the most inclusive access and should be delivered wherever possible.			

LP4: Securing Fenland’s Future

Title:		Position:	
First Name:	J	Organisation:	
Surname:	Smith		
Comment	Support		
Strongly agree with aims and hope every effort will be used to achieve them.			

Title:		Mrs		Position:	
First Name:	Susan		Organisation:		
Surname:	James				
Comment	Object				
I support the objections of the British Horse Society to this policy.					

Title:		Position:			
First Name:	Ian		Organisation:		
Surname:	Hewitt				
Comment	Object				
Policy LP4 focusses on the narrow issue of developers' obligations, & does not say what FDC itself should be doing to mitigate the effects of climate change. For example, the report referenced in footnote 20 has interesting things to say on peat & recycling which could/should be adopted as specific policies.					
The Plan does not specifically address the important issue of flood management. Even though this is primarily the responsibility of bodies other than FDC, reference should be made to it. Fenland citizens are worried about flood risks from climate change, & deserve to be told what can be done to manage those risks & mitigate their consequences.					

Title:		Position:			
First Name:	Natalie		Organisation: Huntingdonshire District Council		
Surname:	Elworthy				
Comment	Support				
HDC supports the inclusion of policy LP4 Securing Fenland’s Future and identification of the list of proposed non-strategic policies which will work towards minimising, mitigating and adapting to climate change. The policy is expected to contribute towards meeting national legislative requirements to ensure that development contributes to the mitigation of and adaptation to climate change.					

LP4: Securing Fenland’s Future

Title:		Position:	
First Name:	Anja	Organisation:	
Surname:	Borgman		
Comment	Object		
I am in support of the BHS Ojections following the dissapointing and completely overshadowed inclusion of equestrian access! As an area with very poor access routes for horses to encourage off road hacking, we should be included in all access proposals as part of access sharing with pedestrians and cyclists.			
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