

10: Health and Wellbeing

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

a. The area under the Council's jurisdiction is often viewed as being rural but it is considered that one of the many benefits is its locality and surrounding environment which to quote text elsewhere in the draft document" ... with its distinctive wetland landscape. It is characterised as an extensive and flat expanse with big skies which convey a strong sense of place, tranquillity and inspiration."

b. Whilst the benefits of "green spaces" are well documented and are included within the text it is considered that further emphasis needs to be made to "blue spaces", either within the surrounding countryside or within urban areas and spaces, to improve the population's wellbeing, and physical and mental health.

Title:		Position:	Head of Business Relationships
First Name:	Zoe	Organisation:	East of England Ambulance Service NHS
Surname:	May		
Comment	Object		
Sec 10 Health & Wellbeing, paragraph 10.5			
Insufficient recognition is given to EEAST as an essential social infrastructure provider impacted by planned housing & population growth.			
Change Requested			
In the text associated with paragraph 10.5 please add the words “& the East of England Ambulance Service NHS Trust” & “ambulance facilities”			
Paragraph 10.5, line 2 to read . . The impacts of the proposed development on the wider determinants of health could be assessed and considered by the applicant at the earliest stage of the design process, this includes developers consulting with health care commissioners and the East of England Ambulance Service NHS Trust at an early stage to identify the need for new or enhanced healthcare infrastructure and ambulance facilities . .			

10: Health and Wellbeing

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

Comment **Neutral**

The references to the Draft Cambridgeshire and Peterborough Joint Health Strategy (2020 to 2024) are out of date – this strategy was delayed during Covid and is no longer current. There is a new joint strategy which should be used and referenced, there is a requirement in the NPPF/NPPG for the local plan process to have due regard to any local strategy – the Joint Cambridgeshire and Peterborough Health and Wellbeing Strategy is one such strategy which the local plan must have regard to. (Joint Health and Wellbeing Integrated Care Strategy - Cambridgeshire County Council)

2. The supporting text in 11.1 would benefit from reference to the impact of cold homes and overheating in relation to impacts on human health and reference to the importance of energy efficiency in other policies within the plan.

3. Chapter 13 clearly sets out the shortfall in affordable housing with paragraph 13.5 stating “total annual affordable housing requirement of around 289 dwellings which is over 50% of the total housing need for Fenland.” With 13.6 recognising the importance of “get the right balance between meeting affordable housing needs and meeting infrastructure needs” and 13.8 understanding the “clear north-south divide” In terms of viability of affordable housing across the fens with the north being 10 -15% lower. This is reflected in two separate “affordable housing zones” which allow the NPPF requirement of 10% affordable housing to be met in the North, with the South’s viability providing more affordable housing. However, it is unclear how this will successfully support housing in the more deprived communities in the North of the county, such as Wisbech and March and if it will impact in areas with high levels of deprivation.

4. Gypsies and Travellers. There is only one reference in the supporting paragraphs to health and wellbeing and is a quote taken from the Planning Policy for Traveller Sites (PPTS), August 2015. An increased emphasis of the benefits this policy can have on health of Gypsies and Travellers in both policy and the supporting text would be welcome, with reference to the increased local evidence that is likely to be revealed as part of the Gypsy and Traveller Accommodation Needs Assessment.

5. Policy LP16: Town Centres, in terms of maintaining and enhancing the vitality and viability of town centres, it is disappointing that no reference is made to measures to encourage cycling and walking, particularly with investment from elsewhere such as the governments emerging “Towns Fund” programme in March.

6. Policy LP17: Culture, Leisure, Tourism and Community Facilities, the policies for new community facilities that will be supported in principle if they: Prioritise and promote access by walking, cycling and public transport and are accessible for all members of society are welcomed, however, In terms of loss, via redevelopment, of an existing culture, leisure, tourism or community facility, the stipulation that this only permitted if it is demonstrated that: “The service provided by the facility is met by alternative provision that exists within reasonable proximity....” needs further clarification in terms of “reasonable proximity” as what is reasonable for local people with access to car can be unreasonable for those who rely on public transport. This is particularly important as according to census data with over 7,000 households in the Fens are without car. Furthermore, no reference is made to community health facilities in this policy.

7. Air Quality, Paragraph 22.9 states “Fenland is in a region affected by particulate pollution from mainland Europe which can cause an adverse impact on background (ambient) air quality. There tends to be higher levels of nitrogen dioxide in the winter months and peaks of larger particulate matter in the spring, which can contribute to seasonal health impacts.” This statement could be more robust and include reference to the number of people currently suffering from respiratory illness e.g. hospital admissions and the latest evidence relating to conditions such as dementia and a number of cancers linked to PM 2.5.

10: Health and Wellbeing

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

Public Health welcome the approach taken in Chapter 10 (Health and Wellbeing) which references the District Council’s corporate objective to ‘Promote health and wellbeing for all’ and acknowledges that the Local Plan can play a key role helping achieve this by setting out policies that will ensure new development will support and encourage healthy lifestyles and meet the NPPF aim to ‘achieve healthy, inclusive and safe places”

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

Health Impact Assessment Policy (HIA). The Local plan would benefit from a specific policy on requiring applications to be supported by an assessment of the impacts on human health. This could be in the form of a specific policy requiring health impact assessments, or by some other assessment which would achieve the same aims. The policy could either reference the three types of Health Impact Assessments (Full, Rapid, and Desktop) or reference further guidance/SPD which could be produced at a later stage. To give clarity to developers/applicants on what type of HIA is “fit for purpose”.

General Comments:

10: Health and Wellbeing

Title:

Position:

First Name: Lynda

Organisation:

Surname: Warth

Comment **Object**

'10. Health and Wellbeing

10.1 One of the Council's corporate objectives is to 'Promote health and wellbeing for all'. The Local Plan can play a key role helping achieve this by setting out policies that will ensure new development will support and encourage healthy lifestyles and meet the NPPF aim to 'achieve healthy, inclusive and safe places²⁴'.

10.2 The government's health profile for Fenland shows that life expectancy, obesity and

10.3 The Draft Cambridgeshire and Peterborough Joint Health Strategy²⁵ (2020 to 2024) shows that needs for health and social care services are not equally distributed across Cambridgeshire. People in Fenland are more likely to have long term illnesses which limit their activities in daily life. Communities with the poorest health are concentrated in north Fenland.

10.4 There is strong evidence that inequalities in health and wellbeing are influenced by social, economic and environmental factors. These are known as the wider determinants of health. In order to help address these priorities and issues, it is essential that community needs are supported through appropriate physical social and green infrastructure, and by other facilities and key services which contribute to improving physical and mental health and wellbeing, and the overall quality of life experienced by residents.

10.5 Most developments have the potential to positively influence health and wellbeing. The impacts of proposed development on the wider determinants of health could be assessed and considered by the applicant at the earliest stage of the design process, this includes developers consulting with health care commissioners at an early stage to identify the need for new or enhanced health care infrastructure. This is particularly true for major schemes such as town extensions: see Part D of this Plan, which identifies strategic sites.

10.6 Active Design, developed by Sport England and supported by Public Health England, provides a set of principles for creating the right conditions within existing and proposed development for individuals to be able to lead active and healthy lifestyles. The Active Design guidance, which provides further details for each of the principles along with a set of case studies, can be found on Sport England's website²⁶. Developers may find it helpful to consider the guidance when preparing a planning application.

10.7 Health and wellbeing cuts across many policies in this Local Plan and is one of the Local Plan objectives and sustainability criteria. Policy LP5 should be read alongside other policies in this plan that seek to address the wider detriments to health in more detail.

(and) Policy LP 5

- promoting high levels of residential amenity (see in particular LP7 Design and LP8 Amenity Provision);
- providing good access to health, leisure and recreation facilities (see, for example, LP17);
- providing and maintaining effective, sustainable and safe transport networks to ensure access to all essential services (see LP20 Accessibility and Transport);
- provision of open space and green infrastructure (see LP29, LP30 and LP31); and
- provision of walking and cycling infrastructure (see LP20 Accessibility and Transport).'

Improvement and enhancement of the Rights of Way network to at least bridleway standard will contribute positively to all the needs highlighted in this section including the final bullet point. This item should be changed to Active Travel as highlighted above to ensure inclusivity across the user groups and to avoid discrimination against women who make up the vast majority of horse riders. Being female is a protected characteristic under the Equality Act.

10: Health and Wellbeing

Title:		Position:	
First Name:	Andrew	Organisation:	
Surname:	Hammond		

Comment **Neutral**

March formed a neighbourhood Plan after a consultation period in 2017. As part of the consultation, I provided comments which included the forming of walking/Cycle routes through and around the town of March. This suggested linking existing routes to other fringe areas around March effectively encircling March and the interconnecting routes through forming the spokes. (I even drew it out on the plan they provided.) It was based on minimising contact between pedestrians/cyclists and vehicular traffic. If we want people to be fitter, safer and in a greener society then this is the sort of policy that should be formulated in a plan that takes us through to 2040 otherwise we will not be any further forward even then.

LP5: Health and Wellbeing

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:	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

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

Policy LP5 Health and Wellbeing says that Fenland will " Have a policy with the expectation that development will promote support and enhance physical an mental health and wellbeing " How is it that is no testing for particulate matter on the A 605 in Whittlesey .despite numerous housing developments being approved which will all access the A 605

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

'Seeking to improve and provide access to good health facilities'. Fenland Group Surgery already at capacity. Car park totally inadequate leading to traffic disruption outside the surgery, residents being asked to travel to adjoining villages to receive treatment. No public transport to get them there.

LP5: Health and Wellbeing

Title:		Position:	
First Name:	Andrew	Organisation:	
Surname:	Hammond		
Comment	Neutral		

March formed a neighbourhood Plan after a consultation period in 2017. As part of the consultation, I provided comments which included the forming of walking/Cycle routes through and around the town of March. This suggested linking existing routes to other fringe areas around March effectively encircling March and the interconnecting routes through forming the spokes. (I even drew it out on the plan they provided.) It was based on minimising contact between pedestrians/cyclists and vehicular traffic. If we want people to be fitter, safer and in a greener society then this is the sort of policy that should be formulated in a plan that takes us through to 2040 otherwise we will not be any further forward even then.

Title:		Position:	
First Name:	Valerie	Organisation:	
Surname:	Lavender		
Comment	Support		

Health and Wellbeing: In order to better support health and wellbeing there needs to be an improvement in the facilities provided within Fenland. One such example would be to support March Bears Rugby Club in their plight to move to a new site (one has been identified). The club's current site in Elm Road is shared and the buildings are in need of investment. The club provides rugby training to all ages and abilities, including 2 weekly sessions of Walking Rugby. These have been attend by people from outside of the area who have been keen to see the program in action with a view to creating similar sessions in their local area. Rugby is good for physical and mental health as well as social interaction.

Title:	Mr	Position:	Planning Manager
First Name:	Philip	Organisation:	Sport England
Surname:	Raiswell		
Comment	Neutral		

This policy should encourage access to sports facilities and also promote open space and green infrastructure to promote opportunities for walking and cycling.

Title:		Position:	
First Name:	Patricia	Organisation:	
Surname:	Brooks		
Comment	Support		

I strongly support the commitment to provision of open space and green infrastructure, which recognises the current inadequacy of natural habitats and tree cover identified on p. 16. As a Chatteris resident passionately opposed to the development of Wenny Meadow, this policy paragraph argues for the Meadow's complete retention, rather than the lukewarm carving up of the site to provide a token open space.

LP5: Health and Wellbeing

Title: **Position:**

First Name: MaryAnn **Organisation:** ICS North Place Partnership

Surname: Watson

Comment **Neutral**

Has Fenland District Council consulted with the NHS and ICB/ICS on the Fenland Local Plan?

Bus services are being cut across Fenland, how will you ensure patients have access to healthcare services and that with new developments you are not increasing the health inequalities across Fenland that already exist. See link below:

<https://www.cambridge-news.co.uk/news/local-news/stagecoach-bus-timetables-18-bus-25062860>

Title: **Position:**

First Name: Valerie **Organisation:**

Surname: Lavender

Comment **Support**

Health and Wellbeing: In order to better support health and wellbeing there needs to be an improvement in the facilities provided within Fenland. One such example would be to support March Bears Rugby Club in their plight to move to a new site (one has been identified). The club's current site in Elm Road is shared and the buildings are in need of investment. The club provides rugby training to all ages and abilities; from 3 years through to 70+, cubs, minis, juniors, youth, men 18+, veterans, girls under 18's, ladies (18+) and walking rugby teams. It attracts people not just from March but also the surrounding villages. The mens team won promotion this year. The walking rugby sessions have been attended by people from outside of the area who have been keen to see the program in action with a view to creating similar sessions in their own area as the benefits of walking sports on physical and mental health has been recognised. Whilst many players attend with family members and friends, often individuals come alone and become part of the March Bears family. The club works to include all, not just those playing, it organises fun days, fundraisers and events at the Elm Road site as well as coach trips to Premiership Rugby Games. All the teams and events happening on a site with just one Rugby pitch, a tired clubhouse, an equipment shed and a small team of dedicated volunteers. Rugby is good for physical and mental health as well as social interaction. With support March Bears Rugby Club can continue to grow, being a credit to the town and supporting Health and Wellbeing of individuals for many years to come.

Title: **Position:**

First Name: April **Organisation:**

Surname: White

Comment **Support**

The proposed development on the site known as Wenny Meadow in Chatteris must not be allowed to go ahead. This area provides a lot of benefit to the local residents but more importantly is already the site of homes for so many, some endangered, species of animals, birds, insects and plants. What right do we have to destroy homes they have had for centuries when provision for human housing is already adequately planned for Chatteris?

LP5: Health and Wellbeing

Title:		Position:	Head of Business Relationships
First Name:	Zoe	Organisation:	East of England Ambulance Service NHS
Surname:	May		
Comment	Object		
Insufficient recognition is given to E EAST as an essential social infrastructure provider impacted by planned housing & population growth.			
Change Requested			
In the first bullet point under Policy LP5 after ‘health’ add “and ambulance” & add “the East of England Ambulance Service NHS Trust” after ‘commissioners’			
First bullet point to read;			
• seeking in accordance with Policy LP19 (Strategic Infrastructure) developer contributions towards new or enhanced health and ambulance facilities from developers where development results in a shortfall or worsening of provision, as informed by the outcomes of consultation with the health care commissioners and the East of England Ambulance Service NHS Trust;			

Title:		Position:	
First Name:	J	Organisation:	
Surname:	Smith		
Comment	Support		
Agree with statement in the draft particularly Health care facilities - these are of upmost importance alongside homes and business developments.			

Title:		Position:	
First Name:	Lynda	Organisation:	
Surname:	Warth		
Comment	Object		
Improvement and enhancement of the Rights of Way network to at least bridleway standard will contribute positively to all the needs highlighted in this section including the final bullet point. This item should be changed to Active Travel as highlighted above to ensure inclusivity across the user groups and to avoid discrimination against women who make up the vast majority of horse riders. Being female is a protected characteristic under the Equality Act.			

LP5: Health and Wellbeing

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

Comment **Support**

The objectives within this policy to maintain and enhance the provision of allotments, community orchards and farmers’ shops and markets is welcomed as an essential component for promoting healthy living.
The supporting text should reference the need to deliver community infrastructure at an early stage of the phasing of development to ensure that the adverse health and wellbeing impacts on new residents can be addressed.

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

Comment **Neutral**

However, the policy should be a separate policy focusing on the control of fast food outlets. There is a strong relationship between spatial planning and the wider determinants of health, and the planning system can shape the built environment and therefore influence human behaviour and lifestyles. In response to obesity, planning can help to:

- Improve healthier eating choices and opportunities for urban growing.
- Promote physical activity by encouraging active travel and improving access to open spaces and sports and recreation facilities.

A quick review of other local authorities local plans and SPDs show that many have introduced specific policies to control hot food takeaway outlets, so this approach has been tested through the planning system and a precedent has been set to control the proliferation of hot food takeaways through the planning system
Any such policy could limit either the location of fast-food outlets near sensitive receptors e.g., schools, workplaces etc. and/or the density of fast-food outlets near sensitive receptors.

Title: **Position:**
First Name: Victoria **Organisation:** Barton Willmore
Surname: Yeandle

Comment **Support**

Metalcraft supports draft Policy LP5.

The draft allocation is located in an accessible location. It is situated adjacent to an Existing Employment Area (the Metalcraft Site) and is in proximity to Chatteris town centre and its facilities and services. The scheme also seeks to provide ancillary uses to enhance the scheme’s overall impacts in transport terms.

The scheme will also enhance access via sustainable modes as well as providing effective, sustainable and safe transport networks (from the A141 and the existing access across the drain). The scheme will providing high quality open space and green infrastructure to enhance the area as a ‘gateway’ to Chatteris.

LP5: Health and Wellbeing

Title:

Position:

First Name: Susie

Organisation: St John's College Cambridge

Surname: Wood

Comment **Support**

Support for the recognition of the importance of health and wellbeing, without being unduly prescriptive.

Title:

Position:

First Name: Lawrence

Organisation: Friends of Wenny Road Meadow

Surname: Weetman

Comment **Support**

Support, with suggestions for improvement:

The Friends of Wenny Road Meadow agree that access to Open Space and Green Infrastructure should be a priority and warrants inclusion within the Health & Wellbeing policy.

We believe that the Health & Wellbeing policy should include reference to access to nature and biodiverse spaces, rather than just Open Space and Green Infrastructure. Evidence shows that having access to nature improves wellbeing (both mental and physical health).

A report by Public Health England, "Improving Access to Greenspace: 2020 Review" (included as FoWRM-01) says that: "Evidence shows that living in a greener environment can promote and protect good health, and aid in recovery from illness and help with managing poor health. People who have greater exposure to greenspace have a range of more favourable physiological outcomes. Greener environments are also associated with better mental health and wellbeing outcomes including reduced levels of depression, anxiety, and fatigue, and enhanced quality of life for both children and adults. Greenspace can help to bind communities together, reduce loneliness, and mitigate the negative effects of air pollution, excessive noise, heat and flooding."

A UK-based study, outlined in the 2018 paper "Not All Green Space Is Created Equal: Biodiversity Predicts Psychological Restorative Benefits From Urban Green Space" (included as FoWRM-02), found that the "restorative benefit" of a green space is higher where the level of biodiversity (here meaning the number of species) present was greater than the restorative benefit of a green space with lower biodiversity. This emphasises the need to explicitly refer to natural green spaces and biodiversity in the Health & Wellbeing policy, and accords with the results of other similar studies.

"Improving Access to Greenspace: 2020 Review" is attached as FoWRM-01.

"Not All Green Space Is Created Equal: Biodiversity Predicts Psychological Restorative Benefits From Urban Green Space" is attached as FoWRM-02.

LP5: Health and Wellbeing

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

Comment	Object
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The Doddington Neighbourhood Plan Group considers that Doddington has insufficient health and wellbeing facilities to accommodate the proposed level of housing growth within the village. Whilst the existing facilities may be capable of very limited expansion to fulfil immediate needs the scale of the additional housing proposed is very likely to create substantial deficits in infrastructure. Evidence will need to be provided by such providers that those facilities are able to accommodate the level of new people who would reside in the village should the proposed housing growth be delivered.

Without this evidence the impact upon existing services and facilities would be substantial and to the detriment of the health and wellbeing of the existing and future population – for example there will be insufficient capacity at the village GP.

This policy is not therefore sound as it is not justified by any evidence.

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

Comment	Object
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As above, we welcome that housing development will need to provide open space and green infrastructure and walking and cycling infrastructure in accordance with Plan policies LP20, LP29, LP30 and LP31. This is subject to those policies, and site allocation policies, including robust and prescriptive requirements to ensure the delivery of this infrastructure through each development. It seems unlikely that policy requirements will achieve significant enhancements in open space and GI provision.

The policy should recognise the importance of the provision of publicly accessible open space for people's health and wellbeing and the deficit in this crucial resource across the district. The Local Plan offers a significant opportunity to address this through the preparation of a green infrastructure strategy, as discussed above, and securing its delivery (open space, biodiversity rich habitat, community orchards, allotments etc.) through development with appropriate plan policy requirements. Opportunities for this should be identified through ecological network mapping and associated Green Infrastructure Strategy as indicated above. Evidence is widely available to demonstrate that access to high quality open space close to where people live can significantly improve people's physical and mental health, their wellbeing and quality of life. It is also important for meeting people's recreational needs and their appreciation and enjoyment of the countryside and its wildlife.

Our advice is that a strategy should be developed to identify opportunities and projects to deliver the Sustainability Appraisal objective to: Create and enhance multifunctional open space that is accessible, links with a high-quality green infrastructure network and improves opportunities for people to access and appreciate wildlife and wild places. Projects to achieve this objective need to be identified through ecological opportunity mapping and embedded within a Green Infrastructure Strategy. The projects can then be delivered through requirements in the Local Plan allocation / major development and biodiversity policies. The indicator for this objective should be measurable net gain in area and/or quality of accessible open space.

LP5: Health and Wellbeing

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

Comment	Object
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Policy LP5: Health and Wellbeing OBJECT	
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Policy LP5 sets out health related criteria for development, and includes references to meeting housing needs, access to employment, access to open space and green infrastructure, and walking and cycling infrastructure. These health related criteria are generally supported.

It is considered that the health criteria related to accessibility to employment, open space and green infrastructure and related to accessibility by walking and cycling could be achieved by directing development to appropriate locations. It is the market towns in Fenland that typically provide the main employment areas, sport and recreation facilities, and open space, and where walking and cycling are more realistic options for travel to services and facilities and employment opportunities. Foster Property Developments is promoting land for development in March, Wisbech and Leverington. There are leisure facilities, outdoor sports and recreation facilities, open space and public footpaths within or accessible from these settlements, providing opportunities for existing and future residents to engage in healthy activities. There are a good range of employment, services and facilities available in March, Wisbech and Leverington, and there are footways and some shared use cycle paths available in these settlements, which means that active modes of transport such as walking and cycling would be an option for some journeys in these locations. As set out in the representations to Part D of draft FLP, the promoted developments by Foster Property Developments would include open space and connections to footways, and the promoted development at land off Wimblington Road in March would also include a connection to a shared use cycle path.

As set out in the representations to Policy LP2, the proposed housing requirement in draft FLP does not include any upward adjustments to address affordable housing needs. There is a substantial need for affordable housing in Fenland, the delivery of affordable housing in the past has been poor, and there is no strategy to ensure that affordable housing needs would be met in full in the future. As such, it is very likely that the housing related health and wellbeing parameters would not be delivered because the identified affordable housing needs would not be met in full during the plan period.

Requested Change

No changes are requested to Policy LP5, but the housing related health and wellbeing criteria would only be achieved by upward adjustments to the housing requirement in Policy LP2 to address affordable housing needs.

11: Renewable Energy

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

Comment **Neutral**

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

- a. On the whole it has been possible to accommodate renewable energy development sites. However, problems have been encountered in the past when dealing with off site requirements, for example, requiring the provision/amendment of road layouts and alignments, to accommodate the specialist haulage vehicles, and export cable routes whether they are under or over ground, particularly in the absence of a suitable connection to the grid. Therefore, it is considered that the location of the nearest appropriate grid connection and the potential detrimental effect that connecting into it may cause must also be considered by the applicant/promoter early in the process.
 - b. Standalone turbines should be placed outside of the fallover/topple distance of a protected watercourse, pumping station, water control including navigation structures or other assets. No blades should over sail a protected watercourse or its associated maintenance access strip.
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11: Renewable Energy

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

Comment Support

11. Renewable Energy

LSbp is supportive of the positive wording for renewable energy in the draft local plan, specifically paragraphs 11.1 to 11.6 that outlay the benefits of renewable energy proposals in overcoming energy price volatility and climate change.

It is noted that paragraph 11.8 outlines the additional benefits that low carbon and renewable energy brings over and above addressing urgent energy security issues. This is encouraged but should be expanded to confirm that significant weight will be given to these additional benefits when considering planning applications for low carbon and renewable energy developments.

We also commend the Council for their support of renewable energy infrastructure such as battery energy storage, which will play a vital role in the transition to a low carbon and renewable energy future.

Underneath the section titled 'Solar Panels', paragraphs 11.21 through 11.23 are also generally supported as they detail the benefits of solar energy. However, we feel that for the plan should include details of the urgency for which more solar energy proposals are needed to ensure that it is positively planned in line with national policy targets:

- Solar is the most rapidly deployable renewable energy technology in the UK. Having electrified solar farms and their surrounding infrastructure on the ground is key to helping the UK deliver on its 2030 Net-Zero goals. According to the Sixth Carbon Budget Report, to meet the UK's carbon reduction commitments of reducing emissions by 78% by 2035 and to reach net-zero by 2050, renewables need to represent 70% and 80% of all energy generation in the UK by 2035 and 2050 respectively. In order meet these goals, solar generation must increase from 10 TWh in 2019 to 60 TWh in 2035 and 85 TWh in 2050. On average, 3 GW of new solar generation will need to be installed per year.

All local planning authorities around the country have a responsibility to contribute towards the above targets and this should be recognised within Policy LP6.

Paragraphs 11.24 and 11.25 are generally supported.

11: Renewable Energy

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

Comment	Object
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Sections 11.15 – 11.20

We note that 2 sites are allocated in the Local Plan for medium to large scale wind turbine development at Coldham and Elm.

However, we were unable to find any evidence base to support the allocation of these two sites. We would expect any allocation to be based on an assessment of areas of potential. The assessment methodology should include consideration of the historic environment including identification heritage assets in the area (arbitrary distance measurements should be avoided) and the setting of heritage assets should also be included as a consideration.

We note that the whole of the district is allocated for small to medium size domestic and non-commercial wind turbines. We are concerned at this blanket approach. It does not follow the approach in paragraph 155 which implies identifying suitable areas rather than everywhere.

Suggested Change - Prepare an assessment to identify suitable sites for wind turbines. The evidence should include assessment of the historic environment.

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

Comment	Neutral
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Whilst it is positive that all of Fenland will be considered as potentially suitable for small to medium wind turbines, it is disappointing that further areas are not 'allocated' as suitable for medium to large scale wind energy development. Given that any wind turbine proposal would still need to obtain planning permission and meet various other requirements (as stated in paragraphs 11.19 and 11.20), not 'allocating' the whole of Fenland as 'potentially' suitable for medium to large scale wind generation, puts unnecessary barriers to further development of this low carbon, low cost technology.

Paragraph 11.2 implies that the UK being a net importer of natural gas is the sole reason for the UK being vulnerable to global price volatility. There are a number of reasons for this vulnerability which the UK would still be subject to, whether or not it was as net importer of natural gas. Other drivers of vulnerability to price volatility include the UK's high dependence on natural gas for heating, the coupling of gas and electricity prices in the market mechanisms, and the ability of private gas/oil extractors and energy generators to sell on the global markets irrespective of whether the gas originated from the UK.

11: Renewable Energy

Title:		Position:
First Name:	Ian	Organisation:
Surname:	Hewitt	
Comment	Object	
Being flat & windy, Fenland is an ideal location for wind turbines. In 11.19, the LP essentially rules out any large scale developments because no Neighbourhood Plan has yet identified any suitable sites. This is weak. The policy should be to leave options open, to say that if a NP comes up with a suitable site for large scale wind farm development, then this will be positively considered.		

Title:		Position:
First Name:	John	Organisation:
Surname:	Revell	
Comment	Support	
Para 11.11 Wind turbines for power generation. This section may need to be updated if recent announcements from the government on planning relaxations for on-shore wind turbines are confirmed. I would welcome further on shore wind turbines in Fenland providing the sites and the numbers are carefully chosen.		

LP6: Renewable and Low Carbon Energy Infrastructure

Title:

Mr

Position:

First Name:

Colum

Organisation:

Cambridgeshire County Council

Surname:

Fitzsimons

Comment

Neutral

The section under Part A of Policy LP6 addressing additional policy considerations for wind turbine proposals should be amended so that a larger area is allocated as potentially acceptable for medium to large wind turbine developments, preferably by allocating the whole of Fenland, and thereby allowing any future proposal to be considered on its own merits.

Title:

Mr

Position:

Planning Officer

First Name:

Graham

Organisation:

Middle Level Commissioners

Surname:

Moore

Comment

Neutral

Part A: Additional policy considerations for wind turbine proposals

Site Allocation LP06.01 SHELAA Ref. 40468 98.79 ha at Coldham Wind Farm, Elm

Comment

a. This allocation appears to be within an existing windfarm which is within a private drainage district where the predominant land owner was Farmcare Trading Ltd. The Commissioners no longer provide a planning consultancy service to this company and, therefore, cannot comment upon any potential adverse impacts except to say that its White Mill Pumping Station is within the allocation site.

B. The watercourse forming the south eastern boundary of the site is the Old River Nene (ORN) which is a Middle Level watercourse and forms part of the Nene-Ouse Navigation Link Route.

Site Allocation LP06.02 SHELAA Ref. 40469 174.29 ha at land adjacent to Graysmoor Drove, Elm

Comment

a. This allocation is within the rateable area of Waldersey IDB being at the confluence of several Boards' District Drains which form an integral part of the local water level and flood risk management system.

B. The allocation is in close proximity to Rings End Local Nature Reserve, Graysmoor Pit and other County Wildlife Sites.

LP6: Renewable and Low Carbon Energy Infrastructure

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

Comment Support

Natural England generally supports this policy to promote renewable energy generation, for economic reasons, and to combat climate change and reduce pressure on natural resources – combined with a requirement Electric Vehicle Charging points through Policy LP22 (Parking Provision). However, this is subject to proposals coming forward in sustainable locations, noting that Fenland district is particularly sensitive to wind turbine development due to potential for impacts to birds associated with the Nene Washes Special Protection Area (SPA) and Ramsar site and the Ouse Washes SPA and Ramsar site. Inappropriately located wind turbines pose a potential risk to these and other birds and wildlife through collision, disturbance and displacement. The district includes a significant area of land considered to be potentially ‘functionally linked’^{2*} to these internationally designated sites, providing foraging habitat important for maintaining the sites’ qualifying bird populations, particularly swans. We welcome that potential impacts on functionally linked land are considered in detail through Policy LP24: Natural Environment.

Planning applications for renewable energy development should be accompanied by sufficient information, including details of any necessary mitigation measures, to demonstrate no adverse ecological impact. Development likely to have a significant effect on a European site, including functional land, will need to be accompanied by adequate information to enable the LPA, as competent authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), to undertake a Habitats Regulations Assessment. HRA will need to consider the effect of development on functionally linked land (FLL) alone, and also in-combination with other projects and plans, in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017, as amended. This is required to protect the integrity of the SPAs from the gradual loss of FLL.

The Local Plan allocates two sites for medium / large scale wind turbine development at Coldham Wind Farm and Graysmoor Drove, Elm. Whilst these sites lie outside the Nene Washes SPA / Ouse Washes SPA IRZ for FLL proposals should be accompanied by sufficient ecological desk-records, field survey and assessment to demonstrate no adverse effect on the integrity of the SPAs, including FLL, through collision risk, disturbance and displacement of SPA birds and wider ecology including other birds and bats and other species. A detailed mitigation and post-construction monitoring strategy will also be required; this should be reflected in Policy LP6.

The Plan allocates the whole of Fenland for small to medium size domestic and non-commercial wind turbines. Natural England’s advice is that these developments should be subject to the above requirements where appropriate, dependent upon scale and location.

Ouse and Nene Washes FLL should ideally be embedded in the ecological enhancement opportunity mapping evidence for the Local Plan. Protected cores of FLL, surrounded by a buffer area, would safeguard this area for SPA birds and ensure that this does not conflict with housing and employment allocations.

* Natural England’s Goose and Swan Functional Land Impact Risk Zone (IRZ) is available to view via <https://magic.defra.gov.uk/MagicMap.aspx>

LP6: Renewable and Low Carbon Energy Infrastructure

Title:		Position:	Principal Environmental Planner
First Name:	Chris	Organisation:	Lightsource bp
Surname:	Atkinson		
Comment	Neutral		
Both Support and Object			

The policy seeks to ensure the delivery of renewable and low carbon infrastructure within the Council. In general, the policy is supported by LSbp and we have made comments which we feel necessary below.

Part A states that renewable and low carbon energy schemes, including ancillary development, will be supported where impacts on landscape character, visual amenity, biodiversity, geodiversity, flood risk, townscape, historic assets, and highway safety” are made acceptable with “regard to its scale, siting and design”. We would question the inclusion of ‘townscape’ as a consideration in Part A of the policy as it is not relevant to renewable energy proposals as they are not developed within built-up areas. Given there is a requirement to consider impacts on landscape character and visual amenity, which are appropriate, there is no need to include ‘townscape’ within the policy.

In addition, there are concerns about part b) of the policy as it is not specific enough as currently drafted. The Council need to specify what impacts they consider renewable energy proposals can potentially have on aviation and navigation systems/communications, otherwise the policy is not ‘effective’ as drafted, as required by paragraph 35 of the NPPF. Furthermore, the supporting text to the policy states in respect of part b) that the applicant must submit evidence which “document areas of agreement or disagreement reached with appropriate bodies and organisations responsible for such infrastructure”. We would question the reasoning and justification behind this, again, it lacks clarity. Who will judge what ‘appropriate bodies and organisations’ are: what happens if such organisations refuse to engage with developers; will the Council refuse to validate an application if this information is not provided. Most importantly, this is seeking to front load the standard consultation process and it is unnecessary and unreasonable to seek it for this particular issue, whilst there is no such requirement when considering other issues. We strongly object to the Council’s approach to part b) of this policy as it fails to meet all four tests of soundness in the Local Plan making process as set out in paragraph 35 of the NPPF.

Part e) of the policy which states that proposals for ground-based photovoltaics, including commercial large-scale proposals, will be under a presumption in favour unless there is clear and demonstratable harm arising; or is located on BMV land. We strongly support this pro-active and positive approach to utility scale solar developments.

However, with regards to the second bullet point under part e), it should be noted that this is not in accordance with the Written Ministerial Statement that was issued by the Government on 25th March 2015. It states “we want to be clear that any proposal for a solar farm involving best and most versatile agricultural land would need to be justified by the most compelling evidence. Of course, planning is a quasi-judicial process, and every application needs to be considered on its individual merits, with due process, in light of the relevant material considerations”. The wording of this is intentional because there are instances where use of best and most versatile agricultural land is required and justified, and the Government do not advocate a blanket ban on solar development. Utility scale solar generally needs an open countryside location, invariably this often means building on agricultural land. The council imply that the majority of agricultural land in the district is BMV, therefore, as the policy represents a blanket ban on solar in the district, we have concerns that this could mean that no solar development will be able to take place throughout the plan’s lifetime. The Council’s proposed policy does not therefore confirm with national guidance and is unsound as drafted. Fenland Council is a case in point where Natural England high level mapping shows most of the district as either grade 1, grade 2 and grade 3a, so to have a positively worded policy stating that utility scale solar will be supported but which also states you can’t build them on best and most versatile land is entirely counterintuitive. We strongly object to this approach and the wording of this part of the policy as currently drafted. Paragraph 158 of the NPPF states that “when determining planning applications for renewable and low carbon development, local planning authorities should (a) not require applicants to demonstrate the overall need for renewable or low carbon energy and (b) approve the application if its impacts are (or can be made) acceptable”. LSbp therefore generally supports the positive wording of LP6, however, we would like the Council to acknowledge that in ‘determining clear and demonstratable harm’ there is some degree of harm that is unavoidable:

LP6: Renewable and Low Carbon Energy Infrastructure

- For example, every development on virgin land will cause some degree of harm to the character and quality of the landscape and this should not in itself be sufficient reason for refusal, only where the level of harm is substantial and cannot be mitigated should it warrant refusal of an application. Therefore, the policy should not be to what level of harm should be considered satisfactorily but rather to what extent can the effects of the development on surrounding land be mitigated against.

Part A goes on to state that 'Where significant adverse effects are concluded by the local planning authority following consideration of the above assessment(s), such effects will be weighed against the wider environmental, economic, social and community benefits provided by the proposal'. In this regard, and as part of the planning balance, significant additional weight in favour of the proposal will arise for any proposal which:

- Is community-led for the benefit of that community; or
- Creates opportunities for co-location of energy producers with energy users; or
- Facilitates renewable and low carbon energy innovation

Part B states that 'Where planning permission is needed from Fenland District Council, support will be given to proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region'. LSbp is encouraged by the wording of this part of the policy and supports its inclusion, specifically in that it addresses the need for additional infrastructure such as battery storage units and sub-stations as connection.

Part C adds a stipulation that "Permitted proposals will be subject to a condition that will require the facility to be removed and the site fully restored to its original condition (or as near as reasonably practical to its original condition) within one year of that facility becoming non-operational, subject to consideration of any biodiversity net gain which has arisen on site as a consequence of the original proposals". Given the Council acknowledge that planning applications for solar developments are subject to planning conditions which require the facilities to be decommissioned there is no need or requirement to include Part C and it should be deleted from the policy. As drafted, we object to the inclusion of this part of the policy.

LP6: Renewable and Low Carbon Energy Infrastructure

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

Comment	Object
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We broadly welcome the inclusion a policy for renewable energy in the Local Plan. Para 155a of the NPPF makes it clear that Local Plans should provide a positive strategy for energy from these sources.

We welcome the reference to heritage in Part A criterion a. However, we suggest that the phrase historic assets should be replaced with either historic environment or heritage assets (in line with the terminology in the NPPF).

We are concerned that the 2 allocations for wind turbines do not appear to have been based on evidence. We are also concerned that the whole of the district is allocated for smaller scale wind turbines.

We advise that such allocations should be based on appropriate assessment, including of the historic environment.

Para.155 of the NPPF advises LPAs to consider identifying suitable areas for renewable and low carbon energy sources in their plans and strategies.

Our advice note 15 on Commercial Renewable Energy Development and the Historic Environment includes advice on an appropriate methodology for identifying such areas in Plan making (see paras 23- 27; i.e. all heritage assets in the area should be identified, arbitrary distance measurements should be avoided, and the setting of heritage assets should also be included as a consideration).

Therefore, it is our view that the evidence base to support the identification of areas suitable for such development is incomplete – it is not justified in terms of potential impacts on the historic environment. We would like to discuss this with you further.

Suggested Change - Amend in Part A criterion a. The phrase historic assets should be replaced with either historic environment or heritage assets.

Prepare an assessment to identify suitable sites for wind turbines. The evidence should include assessment of the historic environment

LP6: Renewable and Low Carbon Energy Infrastructure

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

Comment	Object
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We support the recognition that there is a need to increase renewable and low carbon energy generation. This aligns with Anglian Water's ambition to become a net zero business by 2030* and reduce capital carbon by 70%. (*<https://www.anglianwater.co.uk/siteassets/household/environment/net-zero-2030-strategy-2021.pdf>)

Our Net Zero Strategy to 2030 includes measures for decarbonising our electricity supply, vehicle fleet, as well as focusing on procuring green electricity. Currently we generate around 30% of our energy from renewable sources through bio-resources, wind, and solar power. We already have a wind turbine installed at March WRC, which is viewed in the context of the existing Coldham Wind Farm to the north. In addition, we have installed solar panels at Whittlesey WRC, with plans to install solar at Chatteris WRC. Our target over the next five years is to increase our energy from renewables to 44%. Therefore, we support approaches which enable us to maximise the opportunity for renewable and low carbon energy as close to our operational sites as possible.

We commend the approach taken by the district to facilitate the growth of renewable energy, particularly with the proposition to allocate sites for onshore wind turbines. However, we would welcome a more flexible criteria-based policy in relation to the erection of large-scale wind turbines. For example, our existing renewable energy installations not only contribute towards our renewable energy target, but also help to provide energy security for the operation of essential infrastructure such as our water supply and water recycling networks and assets. Given the wind resource available within the district, we would therefore suggest an amendment to policy to this effect, or a more flexible approach to enable businesses (including new employment areas) to generate their own electricity which is directly consumed on site. This would be consistent with the Fenland District Council Draft Resource Use SPD (2014) where it states that wind turbine proposals with the main purpose of supplying energy for the use of an existing or proposed business would be supported in principle subject to other policy provisions. The Government's Growth Plan (September 2022) indicated the potential of onshore wind would be unlocked by bringing consenting in line with other infrastructure.

Policy LP6 – suggested amendment (in bold underlined italics - SEE +):

Additional policy considerations for wind turbine proposals Proposals for medium to large scale* wind turbine development must be located within an area allocated for wind development in a Neighbourhood Plan or at the following site allocations:

Site Allocation: LP06.01
SHELAA: 40468
Site Area: 98.79 ha
Site name: Coldham Wind Farm

Site Allocation: LP06.02
SHELAA: 40469
Site Area: 174.29 ha
Site name: Elm Land adjacent to Graysmoor Drove, Elm

(+) In addition, proposals for medium to large scale* wind turbine development will be considered where:
A) it supports an opportunity for businesses to generate their own energy as part of delivering net zero carbon emissions, or
B) it is important for energy security and the operation of essential infrastructure.

It is acknowledged that there will be a landscape impact from onshore wind developments due to their vertical presence, particularly within the distinctively flat landscape such as the Fens. We would recommend that there needs to be some clear landscape principles set around onshore wind development, such as evidence used to inform the

LP6: Renewable and Low Carbon Energy Infrastructure

allocated sites for wind, which can be applied in respect of this form of development. It is not clear from the Document Library, what assessment framework was used to identify the sites, and whether there were other potential sites within the district, including areas where large-scale turbines are already located. The tests within Policy LP28 Landscape, would be difficult to meet for onshore wind projects unless in a location where onshore wind already exists and so can be viewed in the context of existing development.

Title:		Position:	
First Name:	Kirsty	Organisation:	
Surname:	Patterson		

Comment Support

The development of renewable energy infrastructure should be encouraged, both as standalone developments and within proposed developments.

Solar panels should be mandatory in all new-build developments, including in policy LP7 (Design).

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

Comment Object

I support the principle of encouraging renewable energy. However the policy wording under sub-para e regarding Best and Most Versatile Land neuters the intentions of the policy. The nature of Fenland is that the vasty majority of agricultural land is Grade 1,2 or 3a which is the definition of BMV. Solar schemes require significant areas of agricultural land. Solar schemes are reversable development – when obsolete and removed the land is easily restored to agricultural use. As such whilst it is appropriate to have a sequential approach on agricultural land quality, applied on a locality basis given the availability of grid connection is a key factor in site selection, it is not appropriate to remove the presumption in favour of development on the grounds of BMV. The policy wording should be amended accordingly to avoid blocking needed renewable energy schemes.

LP6: Renewable and Low Carbon Energy Infrastructure

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

CommentSupport

Part A d) - The Council supports the presumption in favour of solar thermal and photovoltaics on buildings, which should be prioritised over ground-based installations. The policy currently only applies to existing buildings, however, to optimize the opportunity for low carbon energy this should also be extended to new buildings.

Part A e) – There is a presumption in favour of ground-based photovoltaics ‘including commercial large-scale proposals’, unless there is clear and demonstrable significant harm, or it is on BMV land unless it’s peat and the scheme would protect or enhance it, or the site is allocated for another purpose.

This is positive and supported by the County Council, as it strikes a balance between the need for renewables and other priorities within the countryside and the need to protect BMV land and peat soils.

Part D of Policy has a presumption in favour of ground-based photovoltaics ‘including commercial large-scale proposals’, unless there is clear and demonstrable significant harm, or it is on BMV land unless it’s peat and the scheme would protect or enhance it, or the site is allocated for another purpose.

This is positive and supported by the County Council, as it strikes a balance between the need for renewables and other priorities within the countryside.

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

CommentSupport

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

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

CommentSupport

The support in policy LP6 Renewable and Low Carbon Energy Infrastructure is considered to be a proportionate response; the specific proposed allocations for medium to large scale wind turbine developments are at a significant distance from Huntingdonshire’s boundary with Fenland and therefore will not have any visual or landscape implications for this district.

LP7: Design and Amenity

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

Comment **Neutral**

It is important to include flood risk within the design principals as this plays a significant role, particularly in areas which are at a residual risk and may need to set finished floor levels at an appropriate height.

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

Comment **Object**

The National PPF require that Local Authorities produces a design guide for housing development

Fenland have failed in this matter for many years . Housing schemes are often located in rural locations more suited to Town.

In particular a scheme on Coates before north and south greens ,south of Coates Road (A 605) planning code number 40070 could be any urban development .In addition there is no allocation of social housing

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

Comment **Support**

Should the first sentence of this policy also include advertisements?

Points d and e – (aspire towards water neutrality and being cost effective) how will the Local Planning Authority expect this to be demonstrated within a planning application? If such matters are secured via a planning condition, how would the Local Planning Authority enforce them? It is therefore questioned whether these are relevant or necessary and whether a statement to advise that it is an aim for new development to achieve over and above the Building Regulations in terms of water use and cost efficiency would suffice?

Point g – will the 30m guidance for wheeling bins for collection be removed or reinforced? This is with reference to it currently not being required as part of a planning application given an appeal decision.

LP7: Design and Amenity

Title: Mr **Position:** Planning Manager

First Name: Philip **Organisation:** Sport England

Surname: Raiswell

Comment **Support**

The design of new development should encourage active design, to encourage physical activity such as walking and cycling. Further information is provided here; <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

We would like Active Design to be promoted within this policy.

Title: **Position:**

First Name: Patricia **Organisation:**

Surname: Brooks

Comment **Support**

I support the policy insofar as it promotes the need to mitigate climate change, contributing to the sense of place and section E incorporating and RETAINING natural features and biodiversity. The site at Wenny Meadow is a haven of biodiversity whose destruction would do irremediable damage.

Title: **Position:** Senior Conservation Officer

First Name: Daniel **Organisation:** RSPB

Surname: Pullan

Comment **Neutral**

LP7 - Part E Nature:

Unclear here what 'sufficiently green' means. We suggest reference to NHBC Foundation guidance 'Biodiversity in New Housing Developments' as a yardstick. https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf

Title: Mrs **Position:**

First Name: Susan **Organisation:**

Surname: James

Comment **Object**

I support the objections of the British Horse Society to this policy.

LP7: Design and Amenity

Title:

Position:

First Name: Lynda

Organisation:

Surname: Warth

Comment **Object**

'Policy LP7 Design

Part D: Movement

- a) Form part of a well-designed and connected travel network with consideration for all modes of transport offering genuine choices for non-car travel and prioritising active travel and where relevant demonstrate this through evidence clearly showing connectivity for all modes and a hierarchy of routes;
- b) Maximise pedestrian and cycle permeability and avoid barriers to movement through careful consideration of street layouts and access routes both within the site and in the wider context contributing to the delivery of walkable and cyclable neighbourhoods (see Policy LP20 Accessibility and Transport); '

Use of 'active travel' and reference to 'all modes' in (a) of this Policy but not being defined elsewhere is confusing. The correct terminology has been used in this part of the document but it needs to be consistent and clear throughout. Note that a recent cycling survey in Cambridge identified that the majority of cycle journeys were for leisure. The language changes in (b) and should remain consistent and inclusive.

'Part E: Nature

- a) Incorporate and retain as far as possible existing natural features including hedgerows, trees, and ponds particularly where these features offer a valuable habitat to support biodiversity;
- b) Incorporate appropriate landscape and boundary treatments to ensure that the development can be satisfactorily assimilated into the surrounding area, maximising opportunities to deliver biodiverse habitats and to strengthen wildlife corridors and green infrastructure networks;
- c) Be sufficiently green to help achieve wider goals for climate change mitigation and adaptation (Policy LP6 Renewable and Low Carbon Energy Infrastructure), to manage water, or support diverse ecosystems or deliver biodiversity net gain (see Policy LP25 Biodiversity)

Should include protection and enhancement of the rights of way network to at least bridleway standard.

'Part F: Public Spaces

- a) Ensure public spaces are accessible to all, are safe and secure and will be easy to maintain with clear definition of public and private spaces;
- b) Form part of a hierarchy of spaces where relevant to offer a range of spaces available for the community and to support a variety of activities and encourage social interaction;
- c) Be carefully planned and integrated into the wider community to ensure spaces feel safe and are safe through natural surveillance, being flanked by active uses and by promoting activity within the space;
- d) Maximise opportunities for delivering additional trees (Policy LP27 Trees and Planting) and biodiversity gains through the creation of new habitats and the strengthening or extending wildlife corridors (Policies LP24 Natural Environment and LP25 Biodiversity Net Gain) and the green infrastructure network (Policy LP29 Green Infrastructure);'

Should include protection and enhancement of the rights of way network to at least bridleway standard.

LP7: Design and Amenity

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

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

Policy LP7: Design sets a range of design principles which development proposals should seek to meet. While the Government have shown support for development to incorporate good design principles, Gladman note that the Framework (2021) states at paragraph 26:

'To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high-quality standard of design. However, their level of detail and degree of prescription should be tailored to the circumstances in each place and should allow a suitable degree of variety where this would be justified.'

Gladman recognise the importance of high-quality design which is in accordance with the requirements of the Framework. However, design policies should not aim to be overly prescriptive and must include a degree of flexibility to allow schemes to respond to site specific requirements and the character of the local area. There will not be a 'one size fits all' solution in relation to design, thus sites should be considered on a site-by-site basis, with consideration given to various design principles.

LP7: Design and Amenity

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

Comment	Object
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Part E: Nature

Comment - In view of the significant drainage and flooding problems and loss of aquatic habitat highlighted within the local area due to the failure to accommodate existing open watercourses within the urban environment often leading to their neglect due to restricted access for maintenance or being filled it is considered that item a) must be re-worded to include open watercourses. This will provide green and wildlife corridors which will benefit the urban environment.

Part F: Public Spaces

Comment - The Commissioners and associated Boards generally support item d).

Part H: Homes and Buildings

Comment - The extreme weather events experienced during the summer have confirmed that the Council's area is within the driest part of the UK, and in an area of serious water stress.

Whilst it will no doubt be contended that the recent announcement by Anglian Water concerning the Fens Reservoir reduces any local concern it is still considered appropriate to alleviate this problem both growth and development must consider the whole water cycle process, giving serious consideration to reducing water usage.

Within local strategic planning documents water resource issues predominantly refer solely to potable water supply but other water resource issues exist within your Council's area, for example, agricultural abstraction to irrigate crops; to maintain navigation levels; prevent deterioration of water quality and the aquatic environment; and amenity should also be considered, particularly if drought conditions, like those recently experienced, become more regular as the impact of climate change becomes reality.

Therefore, the Commissioners and associated Boards are pleased with requirements that promote water neutrality by minimising potable water use and encouraging the use of recycling and rainwater harvesting to enable the better use of a limited resource and this will also reduce loadings on water recycling centres. However, given the current financial situation and the view that most developers already invest too much into their developments and the known viability issues with development in the area how will this be implemented/enforced?

COMMENT- No reference is made as to how the design of the buildings and developments will incorporate suitable surface water disposal and be resilient to flood risk.

LP7: Design and Amenity

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

Comment **Neutral**

Solar PV should be a requirement and at the very least, designing new dwellings to be adaptable and “retrofit ready” such as providing physical space to install heat pumps.

Policy LP7 Part H should be amended to introduce and strengthen the requirement for new homes and buildings to include low carbon heating systems (wherever technically feasible) and rooftop solar PV.

New buildings should not be connected to the gas network or have fossil fuel heating of any type unless it can be demonstrated that heat pumps are not technically feasible for that site.

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

Comment **Object**

It is contended that emerging Policy LP7 should be amended to contain policy support for the approved Broad Concept Plans, such as that which has been created for ‘West March, Cambridgeshire’, as this will ensure continuity and limit the need to amend or update the approved Broad Concept Plans.

The NPPF is clear in Paragraph 127 in stating that Local Plans should set out a clear design vision and expectations, which contains policies that have been developed with local communities so that they reflect local aspirations and are grounded in an understanding and evaluation of each area’s defining characteristics. The approved Broad Concept Plans are optimally placed to achieve this requirement, as they have been created to directly respond to and enhance the characteristics of a local area and have been subject to consultation and refinement through the planning system by way of planning application that has enabled the local community to engage with their development.

Title:		Position:	
First Name:	Victoria	Organisation:	Barton Willmore
Surname:	Yeandle		

Comment **Neutral**

Metalcraft acknowledges draft Policy LP7.

These representations are accompanied by a Vision Document, which includes an Indicative Masterplan showing how a high quality development could be achieved that on the proposed allocation site that responds positively to the landscape setting, as well as delivering on the need to establish a new Gateway location for the town from the West.

LP7: Design and Amenity

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

Comment **Neutral**

We welcome the Council's intent to produce a district-wide Design Code and look forward to the opportunity to respond on this at the right time.

Anglian Water supports the policy requirements for achieving high quality sustainable design where it contributes towards mitigating climate change and is adaptable to climate change impacts to ensure new development is resilient to the effects of extreme weather events over its lifetime.

We welcome Part E Nature, but consider this should be retitled Green Infrastructure, to represent the multi-functional benefits of a green infrastructure led design, incorporating net gains for biodiversity and sustainable drainage systems for the effective management of surface water flood risk.

We strongly support Part H d) including the aspiration towards water neutrality. We consider the supporting text or glossary should provide a clear explanation of the term 'water neutrality', and signpost to relevant guidance, such as the practical guidance produced by Waterwise. To provide greater clarity and avoid repetition in the plan, we consider that this element of the policy may be more appropriate within Policy LP32 Flood and Water Management.

We welcome a consistent approach in local plans across water stressed areas in requiring the optional higher water efficiency standard of 110 litres per person per day and aspirations towards water neutrality. We would encourage local authorities to go further, particularly where there are opportunities for integrated water management on strategic sites, introducing measures such as rainwater harvesting and greywater reuse. We are working to develop evidence, including from the Anglian Water-led Enabling Water Smart Communities partnership, to support a more ambitious water efficiency target and are keen to share this with local planning authorities when it becomes available. In the meantime, we would suggest the clause is amended to read:

"d) Aspire towards water neutrality by meeting or exceeding the optional higher water efficiency standard set out in Part G of Building Regulations and incorporating integrated water management measures to recycle, harvest and conserve water resources (Policy LP32 Flood and Water Management)"

The supporting text could usefully refer to 110 litres per person per day as the current optional water efficiency standard, but the policy would refer to the building regulations and therefore be consistent with any future changes. We would also welcome inclusion of appropriate indicators in the monitoring framework to provide confidence that the optional standard is being complied with through Building Control.

We note that there is no reference to non-domestic water efficiency measures, and we would encourage the Council to consider introducing a policy requirement for non-domestic development to ensure that similar water efficiency measures are considered, particularly given the proposed scale of employment land being brought forward by the plan.

LP7: Design and Amenity

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

Comment Object

We welcome the reference to local character, landscape and townscape. We welcome Part A – C.

Whilst there is some reference to height in Cb, we suggest that the policy could be clearer in regard to an appropriate policy approach to building heights. Our advice note on tall buildings provides some useful advice in this regard. HE Advice Note 4 – tall buildings:

<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/>
(4 March 2022)

Suggested Change - Include more guidance on policy approach to building heights.

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

Comment Support

LP7(e): Design (Nature)

Support, with suggestions for improvement:

The policy says: “Incorporate and retain as far as possible existing natural features including hedgerows, trees, and ponds particularly where these features offer a valuable habitat to support biodiversity”

While The Friends of Wenny Road Meadow welcome this policy, we feel that focusing upon individual features (retaining individual trees, ponds, etc) might give a misleading impression regarding what is important for wildlife. Many species depend upon “mosaic” habitats, where several different habitat types or features are co-located.

A Natural England guidance note titled “The Mosaic Approach: Managing Habitats for Species” (B2020-009) says: “Most species require a range of elements within a site or a wider landscape in order to complete their life cycle. Many of these elements, such as small patches of bare ground, tall flower-rich vegetation, or scattered trees and scrub, are often absent from the English landscape, and even from some of our most important wildlife sites. This has contributed to serious declines in many species, with some now close to extinction. Providing a mosaic of these elements in the landscape would go a long way towards meeting the needs of many of these species, enabling them to thrive once again and, in turn, would help to deliver a key aim of Biodiversity 2020.” An accompanying presentation says that three-quarters of priority species would see a conservation benefit from mosaic habitats.

This policy should refer to a preference in favour of the retention, improvement, and creation of “clusters” of habitat features and mosaics of different habitat types.

The Natural England guidance note referred to is published here:

<http://publications.naturalengland.org.uk/publication/6415972705501184>

LP7: Design and Amenity

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

Comment Object

The policy seeks to ensure that the developments be of high quality and find a way to incorporate their surrounding environment into the proposal.

In regard to Parts A & E, Paragraph 130 € of the NPPF stipulates that “planning policies and decisions should ensure that development will function well and add quality to the area, not just for the short term but over the lifetime of the development”. As such, a development should not be judges solely on its landscape and BNG impacts in its immediate future but should also consider the mitigation measures which are proposed and which will take time to establish.

When assessing a commercial solar development’s compliance to part I, the Council should acknowledge that solar farms have a utilitarian design and appearance designed to be practical and efficient. This means that non-amendable spaces between panels may be implemented to avoid shading and ensure maximum sunlight can be obtained; whilst associated infrastructure has to be situated in specific areas to ensure connections to the grid.

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

Comment Support

We support this policy and requirements to retain and enhance natural habitats and public open space to maximise opportunities to deliver biodiversity enhancements, strengthen wildlife corridors and green infrastructure networks and to help achieve wider goals for climate change mitigation and adaptation.

We welcome that consideration has been given to the National Design Guide and that a specific Design Code will be developed for Fenland through an SPD. Our advice is that this should take into consideration Natural Cambridgeshire’s Developing with Nature Toolkit to maximise opportunities within the design of the development to provide sufficient area of high quality multi-functional green infrastructure, including sustainable drainage (SuDS) to deliver net gain for biodiversity, landscape and accessible open space to meet people’s recreational and health needs. Appropriately designed and managed green infrastructure can also provide significant climate change mitigation including urban cooling Useful reference could also be made to Natural England’s Accessible Natural Greenspace Guidance detailed in 'Nature Nearby'.

As indicated above, embedding high quality multi-functional GI into housing development provides multiple benefits, including improved public health, better air quality and sustainable drainage and provides good value for money. Places with high-quality green infrastructure attract investment, skilled workers, tourists, and economic activity.

Natural England supports the Plan’s aspiration towards water neutrality by meeting high water efficiency standards of 110 litres per person per day and incorporating facilities to recycle, harvest and conserve water resources, as set out in Policy LP32 Flood and Water Management.

LP7: Design and Amenity

Title:		Position:	
First Name:	Lynda	Organisation:	
Surname:	Warth		
Comment	Object		
<p>Part D: Use of ‘active travel’ and reference to ‘all modes’ in (a) of this Policy but not being defined elsewhere is confusing. The correct terminology has been used in this part of the document but it needs to be consistent and clear throughout. Note that a recent cycling survey in Cambridge identified that the majority of cycle journeys were for leisure. The language changes in (b) and should remain consistent and inclusive.</p> <p>Parts E&F: Should include protection and enhancement of the rights of way network to at least bridleway standard.</p>			
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LP8: Amenity Provision

Title:Position:

First Name:Organisation: Barratt and David Wilson Homes Cambri

Surname:

CommentObject

Policy LP8 is in general supported and BDW fully support the need to protect the amenity of both existing and future occupiers.

It is however requested that part c of the policy is re- worded to ensure accordance with national policy. Paragraph 185 of the NPPF states that new developments should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new developments- and avoid noise giving rise to significant adverse impacts on health and the quality of life.

Policy LP8 refers to avoiding disturbance to the occupiers of neighbouring properties. In some instances a degree of disturbance is un- avoidable, particularly during construction stage. Therefore it is requested the wording of the policy is amended to ensure consistency with the NPPF as follows:

"c) noise and/or vibration levels resulting in significant adverse disturbance for the occupiers or users of any nearby property or land;"

It is considered that the above amendment is required in order for the policy to be considered sound in planning terms.

Title:Position:

First Name:VictoriaOrganisation: Barton Willmore

Surname:Yeandle

CommentNeutral

Metalcraft has considered this draft Policy in its Vision Document and Illustrative Masterplan for the proposed allocation adjacent to the existing Metalcraft site.

Regarding Part A (Amenity of Existing Occupiers), the location of the proposed allocation does not have an unacceptable impact on the amenity of existing occupiers. It is situated adjacent to an Existing Employment Area across the drain. Therefore, it is considered that there is no loss of privacy for nearby occupiers (a, c, d, e and f). The proposed allocation is not situated on any public green space and/or amenity so b) is not applicable.

The Illustrative Masterplan that accompanies these representations has considered Part B of draft Policy LP8. The indicative location of the commercial buildings has considered for adequate light, privacy and noise attenuation. There is strategic landscaping along the edge of the development adjacent to the A141, which, along with providing a gateway into Chatteris, will assist in providing noise attenuation for the commercial units (h).

The Indicative Masterplan and Vision Document are committed to providing the correct number of vehicular and cycling parking spaces, which are well-designed, also taking into account the turning circles for HGVs and service vehicles (l). The Indicative Masterplan has also considered space to accommodate bin storage and collection areas (k).

LP8: Amenity Provision

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

In point (K) it is recommended that consideration should also be given to how collection vehicles reach properties as well as turning points. Narrow roads, lack of parking provision and road layout, including sharp turns can necessitate using additional smaller collection vehicles. Also, the Policy should take account of known expected changes to collection service arrangements.

Title:		Position:	
First Name:	Patricia	Organisation:	
Surname:	Brooks		
Comment	Support		

This policy states that existing AND FUTURE amenity should not be impacted by new development. The building of new housing at Wenny Meadow permanently destroys a valuable local amenity used and loved by generations of residents, and deprives future generations of its magic.

Title:		Position:	
First Name:	Lorraine	Organisation:	
Surname:	Moore		
Comment	Object		

LP8 - Amenity provision shouldn't impact on existing occupiers.

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

Point j – does not include any way in which ‘well designed and located private amenity space’ will be measured. This is a very ambiguous statement, does the Local Planning Authority intend to provide guidance?

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

Point C – this should include an exception for during the course of construction.

LP9: Residential Annexes

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

Comment **Neutral**

Residential annexes are typically single storey extensions with ground floor sleeping accommodation. This style of development makes the residents particularly vulnerable to flood risk, which is heightened by the occupants often being elderly people who rely upon family for care and support. Sites that fall within areas at risk of flooding should be supported by a Detailed Flood Risk Assessment which provides the required mitigation based on the Hazard mapping for that location. For example, finished floor levels should be set above the 0.1% breach depths with climate change (for single storey development) to ensure the development remains safe for any future occupiers

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

Comment **Neutral**

Part d – the annexe may trigger the need for additional parking in accordance with other policies of the Plan and therefore it may not be practical to share parking spaces with the host dwelling.

How does the Local Planning Authority expect it to be demonstrated that an annexe cannot reasonably be provided through an extension to the original dwelling?

We would question what the harm would be for a detached annexe if it was conditioned to be tied to the host dwelling.

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

Comment **Support**

LP 9 Criteria for residential annexes are sensible.

LP10: Shop Frontages, Security Shutters and Canopies

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

Comment	Object
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The retention of original/historic or significant shopfronts elements are often integral to the character of these buildings and that of the wider street scene. This policy should highlight the importance of retaining or restoring historic shopfront features. This is both in terms of the positive contribution historic shopfronts make to the character of an area, but also the economic benefit of providing traditional and bespoke shopping units to shop owners.

A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored.

Suggested Change - Add clause to policy to encourage retention and restoration of historic shop frontages.

LP11: Community Safety

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

Comment **Neutral**

In respect of the provision of footpaths and street lighting see item Public Rights of Way below.

Public Rights of Way (PROW) (Page 79)

Comment -Where possible footpaths, cycleways, street lighting and/or other street furniture should be positioned outside of any protected watercourse and the associated maintenance access strip.

The prior written consent of either the Commissioners or associated Boards may be required and they will wish, when appropriate, to be involved in any discussions at the earliest possible stage.

Consent will only be given for hard surfaced "pavements" where a formal hardened road exists and will require that the relevant structure is positioned away from the watercourse on the landward side of the road.

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

Comment **Object**

Under point (a), the terminology is not clear regarding the range of activities 'throughout the day'. This should be amended for clarity.

Title:		Position:	
First Name:		Organisation:	Barratt and David Wilson Homes Cambri
Surname:			

Comment **Object**

Policy LP11 is in general supported and it is agreed that community safety should be considered as a priority when planning new developments.

It is worth noting that in some instances informal walking routes, particularly within areas of open space are more appropriately not to be lit to minimise impact upon ecology. It is therefore suggested that a minimal change is made to policy point d) as set out below:

"d) all adoptable footpaths should be well lit and, if possible, overlooked by dwellings. Footpaths to the rear of properties should be avoided where possible;"

LP11: Community Safety

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

Comment Support

Policy LP11: Community Safety, relating to crime is supported, however there is no standard set on which to judge an application.

Reference should be made in the Policy to the “secure by design” standard, although the supporting text in 12.20 states that secure by design principles should be taken into account as part of LP7 this is not the case and LP7 does not specifically mention secure by design.

13: Housing

Title:		Position:	Group Planning Associate
First Name:	Natasha	Organisation:	The Planning Bureau Limited
Surname:	Styles		

Comment	Object
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McCarthy Stone is the leading provider of specialist housing for older people for sale. Please find below our comments on the Draft Local Plan which specifically addresses the need for specialist housing for older people.

Para 13.32

Whilst we support the recognition within the draft plan for homes for older people, we feel that in order to be in accordance with the PPG on 'Housing for older and disabled people' Paragraph: 006 Reference ID: 63-006-20190626 and paragraph 62 of the NPPF that requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies, including older people, the plan should specifically identify the need for older peoples housing. This need is specifically identified within the council's evidence 'Housing Needs of Specific Groups, October 2021 (GL Hearn) that identifies at table 96, page 195 that out of the annual housing need / requirement identified for Fenland of 538 homes, 112 of these homes should be specialist housing for older people. This represents 21% of the district's housing need. Over an eighteen year period 2022 to 2040 this represents a need of 2,016 homes and is therefore a substantial proportion of the housing requirement and due to the importance should be properly planned for. In order to meet this need as the amendment to text recommended the council should also look to allocate small sites to meet the needs of housing for older people.

Paragraphs 13.32 should be amended as follows:

13.32 Evidence prepared to support the plan identifies that there is a need of 112 homes per annum to meet the needs of older people. This represents 21% of housing need. There is projected to be a two-thirds increase in the population aged 75 and over across Fenland during the plan period to 2040 with similar increases in the number of people with dementia and just over a 50% increase in people with mobility difficulties. Providing for an increasingly elderly population is therefore a key objective of the Local Plan. Elderly person accommodation whether purpose built housing or residential care homes can also assist in freeing up housing for younger people and families.

Title:		Position:	
First Name:	Yvonne	Organisation:	
Surname:	Payne		

Comment	Object
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With every housing development comes increased population requiring an increase to doctors and dentists. It is no use building doctors surgeries and dentist surgeries when there are no doctors or dentists to work there. How will you increase the number of doctors and dentists when there is already a national shortage.

13: Housing

Title:

Position:

First Name: John

Organisation:

Surname: Tuerena

Comment **Object**

The quality of house to be built needs addressing.

Recent market studies suggest that the new generation of home buyers are totally unaware of “The World In Action” documentary made in 1983 and are not anti-timber frame. Indeed house builders and timber frame companies are keen to promote the perceived environmental benefits of this method of construction. In 2010, one in four new homes were being constructed using timber frame or, to be more accurate timber panel, construction. However, recent catastrophic fires have cast doubt on this method of construction and the beneficial myths of timber frame homes. Timber frame homes are built using a clad softwood frame for the inner leaf of the cavity wall. This is covered with breather membrane which is designed to repel any water that penetrates the outer leaf cladding material but is permeable to water vapour escaping from the timber structure. Completed homes constructed using a timber frame can be easily recognised by the mastic-filled 25mm movement gaps under the roof soffits and the 15mm gaps under the window cills. These allow for the frame to shrink (settle) as it dries out. There should also be evidence of a ventilated cavity, which allows the timber frame to breathe. In addition, timber frame homes are sometimes clad with timber boarding, vertical tiling or even rendered plywood.

Why do house builders prefer to build using timber frame?

Faster method of construction and higher profits.

The inner leaf, first floor and roof trusses can be fully erected in 2 or 3 days. With up to 20% fewer labour days on site it provides a faster return on the house builder’s investment and greater potential profits.

Less expensive construction method and higher profits.

Lighter Timber frame buildings are lighter than those built in traditional brick and block and therefore do not need expensive, over engineered, designed foundations or require good ground bearing strata. Timber frame systems are particularly suited to brown-field sites with poor soil conditions that can only accommodate lighter buildings unless costly foundation design solutions are used.

Other advantages? Perceived as more environmental friendly. If constructed properly, they can be more energy efficient. Easier to install pipes and cable for utilises plumbing electric and communications etc, and with the exception of energy efficiency, all of the advantages favour the house builder not the new homeowner!

Public perception of timber frame construction in housing. A recent MORI poll revealed:

90% of people prefer to live in a home with the characteristics of modern masonry construction - excellent sound insulation, longevity and robustness.

56% of people believe new homes should be built to last and 71% of homeowners believe masonry homes have a longer life span.

69% of homeowners believe that they will achieve a favourable resale value from a home constructed in masonry using modern bricks and blocks and concrete masonry.

Current research by SmartLIFE, a housing project in Cambridge, confirms this summary of public attitudes. There is sentimentality for brick among some homebuyers, which may also explain why so many house builders choose to put a brick exterior on timber frame homes.

Many people are deluded by disinformation and think that high quality housing methods go hand-in-hand with modern

13: Housing

construction techniques such as timber and steel frame developments; but most people have no idea what form of construction has been used for the dwelling they invest so much money and time into? Consequentially ill-informed buyers don't really care if you offer them an affordable property that is high-spec and energy efficient, close to local amenities. Their mindset is establish via ignorance and it doesn't matter to them how that home is built?

Environmental impact of the materials.

To assess the environmental impact of any building material every aspect must be taken into account. The UK Timber frame association claim that "wood is effectively a carbon- neutral material (even allowing for transport), and timber frame has the lowest CO2 cost of any commercially available building material. For every cubic metre of wood used instead of other building materials, 0.8 tonne of CO2 is saved from the atmosphere. Every timber frame home saves about 4 tonnes of CO2."

The Whitewood softwood timber used in the manufacture of the timber stud panels is exported from Canada or Eastern European (Russian) forests. Whilst it is sourced from managed resources, the raw timber will be transported over great distances before it eventually reaches the site.

The vast majority of bricks and blocks used in the UK building industry are manufactured in the UK, reducing the carbon footprint caused by transportation. They are produced in local factories providing British jobs and supporting the local economy, using locally sourced raw materials, and, in many cases, using waste by-products from other industries such as ash from coal-fired power stations rather than sending this to landfill.

Brick and block is a resilient material and extremely hard-wearing. This means homes built in masonry have a very long life span at least 100 years or more, and levelling out any environmental impact over centuries. When the time does come to replace masonry buildings they can and will be 100% recycled.

Quality issues with timber frame new homes.

Timber is a living material that expands and shrinks within differing atmospheric conditions. Humidity variations cause timber frame problems and their owners. Extensive shrinkage and cracking caused by wood drying out and settling is common. The structure is often restrained by structural steelwork causing lumps or bumps in large-span floors. Fixing studs warp and bow out-of-line as the frame dries out generally from heating systems. Hollows or bulges in walls can develop voids behind them. This is impossible to remedy without opening up the wall panel and replacing the affected studs. Even if all the studs are checked by the house builder there is no guarantee that some studs will not warp once the heating goes on. Anyone buying a timber frame new home would be well advised to check the walls for line and plumb using a 5ft spirit level before moving in. Another problem that is often not rectified is missing or insufficient fixings. Modern nail guns used for the job on site, use nails that are of a smaller gauge and have a smaller head, unlike regular nails.

Fire occurrence.

The UK Building Regulations state minimum fire resistance of 30 minutes for all new homes and buildings regardless of the materials used in construction. This minimum 30 minute requirement is for the structure to survive intact and prevent fire spread. This enables the safe exit of people to safe areas. Unfortunately; approximately 200 homes suffer fire damage each day. The human cost being on average; 1 death and 40 injured.

Far exceeding this minimum, a masonry house built with concrete pre-cast floors offers over 4 hours of protection to its occupants because masonry doesn't burn. Even in the worst fire a masonry house or apartment block will maintain its structural integrity, with only the timber elements requiring replacing. Homes built using traditional construction protect against the spread of fire between rooms or properties. A timber frame home in most cases, will be totally destroyed.

Regal Fields development observations.

From firsthand experience and observation, the standard of build on this development is suspect at best?

13: Housing

Chip board wood frames and plastic roof tiles and chimney pots are the most obvious.

At an average price of £495,000 may the buyer beware.

Title:		Position:
First Name:	Richard	Organisation:
Surname:	Hibbert	
Comment	Neutral	
I note there is no reference to Social Housing in the allocation of dwellings. If the District is to grow an increase in Social Housing is essential. FDC should be more imaginative in how it can deploy its funds and become once again a supplier of Social Housing.		

LP12: Meeting Housing Needs

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

Comment Object

Part E – Accommodation for Vulnerable People

This should be strengthened to establish whether flood risk constitutes a fundamental constraint. Flood risk could restrict the number of developments brought forward as we would expect that any development is set above the relevant flood levels. This is to ensure that the development remains safe for the users, however this could mean that access could be reduced as stairs or ramps would be required to access the properties.

Part G – Homes for Permanent Caravan Dwellers/Park Homes and Boat Dwellers

Annex 3 of the PPG states that the vulnerability classification for caravans, mobile homes and park homes intended for permanent residential use is highly vulnerable, whereas traditional houses are classified as more vulnerable. There will be instances where development of a residential property may be appropriate, but caravans may not be appropriate. As such, we would recommend that Part G is amended accordingly. If this policy is relating to a temporary siting of a mobile home for residential use while a property is being developed, we would suggest that this is clarified and that a flood risk assessment would still need to be provided.

Policy LP18: Development in the Countryside.

Part C: Mobile homes within the countryside

The policy states that mobile homes will be treated as permanent dwellings because mobile homes can be used for permanent residential purposes. Please note that mobile homes have a higher flood risk vulnerability classification (Highly vulnerable) than permanent dwellings. As such they should be treated more critically. There is no definition of a 'mobile home' within the glossary. This should be made clear to ensure no ambiguity as to which vulnerability classification the development falls under.

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

Comment Support

In the past for many years have used " Viability assessments " to reduce to zero the amount of social housing on a particular site .Developers produce all sorts of reasons why SH should not apply. Low sales are often quoted .This is not the case in Whittlesey where house sales match Peterborough prices.

Policy LP 12 reintroduces a minimums of allocated social housing which I support .In the Whittlesey parish it is 20% on certain size sites.

LP12: Meeting Housing Needs

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

Comment Object

Over 50% of the annual total housing need in Fenland is for affordable housing - subject to viability. This makes a nonsense of the provision of 20% on developments of 10 houses or more. Viability issues mean that these are never built. Contributions from developers may be levied but this money will disappear into the 'Fenland Pot' and not be used in villages, where it is most needed. A lose, lose situation.

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

Comment Neutral

Policy LP12 Meeting Housing Needs will need to be revised to take account of the government's response published on 29 July 2022 to their consultation on raising accessibility standards for new homes. The recommendations from this state the government's intention to mandate the introduction of M4(2) via a change to the Building Regulations and statutory guidance in Approved Document M. HDC consider that delivering all new homes to the higher standard will benefit a wide range of residents and viability challenges will be reduced once the standard is mandated nationally. The viability challenges of providing affordable housing in Fenland are recognised and the division of the district into two areas with differing levels of requirement is supported as a pragmatic solution to this.

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

Comment Support

Policy LP12: Meeting Housing Needs Part A

Will the desired housing mix take into consideration flood risk requirements ie that single-storey dwellings might be required but may not be achievable in areas at high risk of flooding? Or will allowances be made to achieve such developments in these locations?

LP12: Meeting Housing Needs

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

Comment	Object
Policy LP12: Meeting Housing Needs Part B	

With regards to the provision of affordable housing on brownfield sites, will this be any brownfield site or must it have been previously placed on the Local Authority’s Brownfield Register?

The figure used as a basis for the commuted sum for off-site affordable housing provision does not appear to take into account the ‘affordable housing zones’ set out in paragraphs 13.9 and 13.10 of the Plan. We consider that there should be 2 commuted sums, one for the north of the District and one for the south given the viability disparities between the two areas.

A definition is required to establish what would constitute an ‘obviously linked’ development.

LP12: Meeting Housing Needs

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

Comment **Neutral**

Policy LP12: Meeting Housing Needs
COMMENT

Policy LP12 identifies the policy requirements for housing, including housing mix and affordable housing. The supporting text to Policy LP12 identifies the affordable housing needs of Fenland District and highlights the viability and deliverability issues associated with meeting those needs.

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 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 latest Fenland Monitoring Report for 2020/21 includes affordable housing completion data from 2002/03 to 2020/21 (see Table 7) and highlights the poor delivery of affordable housing against policy requirements. The need for affordable housing in Fenland District is substantial, and as such it is appropriate to identify policy requirements for affordable housing.

Paragraphs 13.13 and 13.14 seek to explain the affordable housing thresholds that apply to residential development, which 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 thresholds and requirements have been derived from evidence of development viability at different types of site and locations – see Fenland Viability Report. Paragraph 34 of the NPPF relates to planning obligations and expects development plans to set out the levels and types of affordable housing required and should be set at levels that do not undermine deliverability. Section Id.10 of the Planning Practice Guidance provides guidance on viability, and Paragraph 002 (of Id.10) confirms that policy requirements for affordable housing should be set at a level that allows development to be deliverable. If development brought forward through draft FLP is to remain viable it would not be possible to increase the proportion of affordable housing from qualifying sites above the proposed thresholds. Therefore, other options to increase the supply of affordable housing will be required if needs are to be met during the plan period for draft FLP. It is considered that additional allocations should be identified to increase the supply and delivery of affordable housing; the representations to Part D of draft FLP request additional allocations in March, Wisbech and Leverington on land promoted by Foster Property Developments that could deliver additional affordable housing.

LP12: Meeting Housing Needs

Title: **Position:** Senior Planner

First Name: Victoria **Organisation:** Gladman

Surname: Demetriou-Smith

Comment **Object**

Policy LP12: Meeting Housing Needs, Part B- Affordable Housing sets out the affordable housing requirements for the District. For sites in the south of the District development proposals of 10 or more dwellings on greenfield sites should provide 20% affordable housing. For sites in the north of the District, development proposals of 10 or more dwellings should meet the NPPF requirement for 10% affordable home ownership. For all brownfield sites proposals of 10 or more dwellings anywhere in the District should meet the NPPF requirement for 10% affordable home ownership.

It is noted that the latest SHMA evidence has calculated that there is a total annual affordable housing requirement of around 289 dwellings which is over 50% of the total housing need for Fenland. To help meet this need it is therefore important that a proportion of all new housing developments are affordable, subject to viability. However, with viability limiting the proportion of affordable housing that can be provided on a development, it becomes imperative that the housing requirement is increased to ensure that a suitable level of affordable housing is delivered across the District.

Title: Mr **Position:** Planning Manager

First Name: Mark **Organisation:** Home Builders Federation

Surname: Behrendt

Comment **Object**

Part D of the policy is unsound because it is not effective

The Council recognise that an increasingly elderly population will require the delivery more specialist accommodation in future. As such, the priority should be for the Council to allocate sites promoted for such accommodation in the local plan. Only through site allocations can the Council be certain that the needs of older people be met.

However, the HBF recognise that it may not be possible to allocate sufficient sites for specialist accommodation to meet the needs of older people. As such it is important that the policy provides an effective mechanism through which decisions on accommodation can be made on the basis of the need for and supply of such development.

Recommendation

The policy is amended to set out how many specialist homes for older people are required in Fenland and a commitment is made to monitoring supply against this level of need across the plan period.

Title: Councillor **Position:**

First Name: Gavin **Organisation:** Parson Drove Parish Council

Surname: Booth

Comment **Object**

LP 12 – Part C Exception sites should also include a criteria that the application site should be supported by the Parish Council, this is in line with the Parson Drove Neighbourhood Plan. Limit of up to 5% is proportionate. Note the affordable housing criteria of 10% and reasons due to viability.

LP12: Meeting Housing Needs

Title:		Position:	Group Planning Associate
First Name:	Natasha	Organisation:	The Planning Bureau Limited
Surname:	Styles		

Comment Object

McCarthy Stone is the leading provider of specialist housing for older people for sale. Please find below our comments on the Draft Local Plan which specifically addresses the need for specialist housing for older people.

Policy LP12 – Meeting Housing Needs

We recognise that it may not be possible to allocate sufficient sites to meet the needs of older people’s housing and therefore support the provision for older people’s housing made within policy LP12. However, to ensure that policy LP12 is justified, effective and consistent with national policy consideration should be given to amending Part D on homes for Older People as follows:

Part D – Homes for Older People

To help meet the demands needs identified in para 13.32 of an ageing population in Fenland proposals will be supported, in principle, which incorporate measures which are likely to be beneficial to older people, and thereby encourage and enable older people to reside in such properties, both now and as they grow older.

Measures should include age restricted market housing, communal facilities such as a lounge, laundry and guest room and some on site assistance.

All development proposals should set out how such measures have been considered and incorporated into the scheme. Proposals will be refused which fail to demonstrate appropriate measures have been considered and incorporated, where it would appear to have been practical, likely viable, and appropriate to have done so.

LP12: Meeting Housing Needs

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

Comment **Neutral**

Part G: Homes for Permanent Caravan Dwellers/Park Homes and Boat Dwellers

Comment - In their role as a navigation authority, the Commissioners recognise that there is a need for more residential moorings in the Middle Level district and that this need is likely to increase as more people instigate life changes that result in them exchanging permanent or temporary housing for residing on a boat. The Commissioners are not a Planning Authority and cannot therefore grant permission for residential moorings. Any land owned by the Commissioners tends to be the watercourse and channel profiles only which limits what could be delivered without the involvement of third party land owners.

The Commissioners have liaised with the Residential Boat Owners' Association who have members who are continuous cruisers. Where a number of residential craft exist in a single location, the manager and/or caretaker of the site often resides aboard a boat thus removing the need for a land-based management dwelling.

The Commissioners have liaised with your Council and met virtually and responded to RRR Consultancy Ltd who have been employed by your Council to investigate and report on boat dwellers' accommodation needs. This investigative work is specifically designed to assess what the requirement is for residential mooring and it was intended that this report informs the Local Plan and the data used to identify suitable locations for sites to be included within the allocation process.

Further Actions

Once reliable information and data gathered from other sources to review the demand for residential moorings is available the Commissioners will:

- a. Work with the Planning Authorities, including your Council, Town and Parish Councils to encourage and support the provision of residential moorings, both permanent and transitory.
 - b. Work with Developers and Land owners interested in promoting sites for residential moorings.
 - c. Work with local and national navigation bodies to understand the need and requirements; to acknowledge and consider the implementation of and/or action further investigation or share any learning that might be available.
 - D. Investigate how best to support delivery and identify what constraints may have to be placed on residential mooring developments (on a site-by-site basis) to ensure that the moorings delivered are effective and do not impact negatively on other users of the waterways.
-

LP12: Meeting Housing Needs

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

Comment Neutral

Policy LP12 Part D – This section on homes for older people is welcomed, however, the plan would benefit from the inclusion of a policy and/or supporting text to encourage street furniture for older people e.g., benches, within new developments and public spaces.

It is disappointing that Policy LP12 does not extend the requirement for Building Regulations Part M4(3) to the affordable rented sector only to social rented properties. The policy clearly acknowledges that the population of Fenland is an ageing population – this aging population is not limited to affordable rented occupants. The current target will only achieve the Part M4(3) standard on 1% of all dwellings on sites greater than 100 dwellings.

Paragraph 36.36 - Whilst the argument that minimum room sizes affects viability is acknowledged the Local Plan would benefit from the inclusion of a policy on minimum room sizes. Adequate space provides personal privacy and can reduce depression, anxiety and stress, giving children room to play and a good night’s sleep. Cramming of different activities (studying, socialising, and relaxing) into limited space may adversely affect family life, creating a difficult dynamic which may play a part in the breakdown of relationships.

LP12: Meeting Housing Needs

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

Comment Object

13.5 – 13.32 and LP12

The Fenland local Plan and CIL Viability Report (March 2020) is out of date as a result of House price increases and Rapid build cost inflation. This is noted in the Viability Note (May 2022) which is itself also now historic, given the current financial turmoil, the affect on interest rates, projected affect on the future housing market and prices.

There are outstanding objections from myself to the March 2020 report, in terms of the modelling methodology (eg exclusion of garages, projections of prices above the data analysis undertaken, the correct line of divide between any policy for North and south of the District) and site specific assessments continue to demonstrate the viability issues in all parts of the District – not just the northern section, and consents being granted now are reflecting this, with the agreement of Council officers tasked to review those assessments.

The Draft Plan contains policies in relation to affordable housing within LP12 that are founded upon an out of date Viability document that current applications are demonstrating is not fit for purpose. It is essential at the Regulation 18 stage that this document is updated and forms part of the debate on these policies. It is implied that it will only be updated at Regulation 19 stage, by which time the LPA will have a final (in their eyes) version of the plan and be unwilling to consider amendments irrespective of the outcomes of a Viability update.

Given that Policy is written to require the minimum level of affordable ownership level that NPPF requires, but is acknowledged to be unviable on that basis in parts of the District, the consequence is that other developer contributions will have to reflect this viability deficit within S106 agreements.

Specifically we object to the following in the policy wording

LP12 Part B. We disagree that at present the Southern part of the District is viable at 20% affordable housing. This figure should be reviewed based upon an updated Local Plan Viability assessment undertaken having regard to corrections in the modelling.

We object to map 2 – Elm PC area is a housing market related primarily to Wisbech rather than March with values at similar level to the northern Parishes and should lie within the Northern area for the purposes of this policy

LP12 Part B there is an absence of any provision for site specific viability assessment to be a material consideration. The wording notes that the levels will be by negotiation but such negotiation should be based upon a recognized form of site specific assessment as currently occurs and the policy should reflect this in its wording.

Para 13.22 says that an annual review of the commuted sum in lieu will be undertaken. This should be based upon Viability updates and enshrined in Part B of the policy rather than any figure index linked. It makes no sense in a time of high inflation and potentially falling house values that the sum in lieu should automatically rise when viability may be reducing.

LP12: Meeting Housing Needs

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

Comment	Object
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LP12: Meeting Housing Needs

2.3.1 It is noted that the policy deals with housing mix, affordable housing, exception sites, homes for older people, accommodation for vulnerable people, dwellings with higher access standards and homes for permanent caravan dwellers/ park homes and boat dwellers. This is a significant number of topics to cover in one policy and it is advised that the Council look to break this policy down in a number of different policies for ease.

Part A – Housing Mix

2.3.2 Whilst the housing mix policy is generally supported it is suggested that provision is made for deviation away from the housing mix as identified in the latest Strategic Housing Market Assessment (SHMA) where supported by the appropriate justification and market evidence that an identified need is to be met.

Part B – Affordable Housing

2.3.3 Johnson Mowat take this opportunity to reiterate earlier sentiments in relation to affordability within the District. Whilst the provisions of draft policy LP12 are generally supported, and the identified provision of varied affordable contributions within the District is appropriate and aligns with the evidence as set out in the viability reporting, there remains cause for concern in respect to meeting the District's identified affordable housing need.

2.3.4 It is therefore stressed that the Local Plan should seek to include more allocations in order to meet the identified affordable housing need.

Title:		Position:	
First Name:	Paul and Belinda	Organisation:	
Surname:	Clark		

Comment	Object
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Part F of draft policy LP12 in relation to M4(2) should include a viability allowance. The draft policy is not sound without this amendment as it is not justified.

Where viability is a valid consideration it will impact M4(2) requirements as much as the other requirements (i.e. M4(3)) where a viability allowance is made.

LP12: Meeting Housing Needs

Title:		Position:	
First Name:	Carole and Susan	Organisation:	
Surname:	Fisher		

Comment	Object
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Part F of draft policy LP12 in relation to M4(2) should include a viability allowance. The draft policy is not sound without this amendment as it is not justified.

Where viability is a valid consideration it will impact M4(2) requirements as much as the other requirements (i.e. M4(3)) where a viability allowance is made.

Title:		Position:	
First Name:	Susie	Organisation:	St John’s College Cambridge
Surname:	Wood		

Comment	Support
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Support for the recognition that viability in Fenland is marginal, and that enhanced accessibility and adaptability has viability implications. In this context the following expectations of LP12 are supported:

- Development proposals in the south of the district should, through negotiation, provide 20% affordable housing;
- All development proposals should set out how measures likely to be beneficial to older people have been considered and incorporated into the scheme (rather than prescribing details);
- At least 25% (rather than more) of all new dwellings on any site should meet building regulation M4(2); and
- On any scheme delivering 10 or more affordable rented properties, at least 10% (rather than more) of the affordable rented dwellings should meet building regulation M4(3)(a) subject to viability.

Title:		Position:	
First Name:		Organisation:	Barratt and David Wilson Homes Cambri
Surname:			

Comment	Object
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Policy LP12 sets out a requirement for settlements within the south of the District to provide a total of 20% affordable housing on site and those within the north of the District to provide 10% affordable housing. This figure is considered to be appropriate and is considered to provide a suitable balance between meeting the identified housing needs of the District, whilst also ensuring that sites remain fully viable in planning terms.

The proposal for 25% of dwellings to be built to M4(2) standards will result in significantly increased build costs and has the potential to affect the viability of housing schemes coming forward. From review of the Draft Local Plan, there does not appear to be a robust evidence base to justify this requirement. It is considered that additional justification needs to be provided to demonstrated why this is required, which goes above and beyond Building Regulation Standards. For the vast majority of the population, M4(1) Building Regulations are more than adequate to meet the needs for accessibility requirements. It is therefore considered that in its current form this element of the policy is not sound and does not comply with national policy in that it is not justified. It is recommended that this requirement is deleted from the policy wording.

The 10% of the affordable dwellings to be built to M4(3) standards is considered to be appropriate and will ensure choice and flexibility for all end users. It is important that the words subject to viability remain in the policy.

LP12: Meeting Housing Needs

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

Comment	Object
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Part C of this policy requires that for proposals of 100 dwellings plus, at least 5% of the total number of dwellings should be self-build or custom build.

Persimmon Homes are strongly of the view that the Council do not have an evidence base to support the inclusion of criteria point C.

In the most recent Fenland Monitoring Report 2020 – 2021 published in February 2022, the evidence presented shows an oversupply of self-build/ custom houses as can be seen at Tables 10 (Self Build and Custom Build Housing Register) and 11 (Self Build and Custom Housing Permissions) from this monitoring report.

(For tables see attachment - Fenland Local Plan Review Response - LP12 Custom and Self Build - with this representation)

The 2020 – 2021 Monitoring Report further states: ‘The permissions granted demonstrate that the demand for self-build and custom build (as identified by the register) is comfortably coming forward.

On Fenland District Council’s ‘Self Build Register’ website page states ‘In Fenland’s case, the number of homes that get built as custom/ self-build is for greater than the number of people on the register of interest.....’

The evidence put forward by FDC in the GL Hearn document ‘Housing Needs of Specific Groups October 2021’ also confirms this position.

Paragraph 57 of this document states ‘The Local Authorities will need to ensure the actual number of entries on their self-build registers each year are matched by the number of self-build plots given planning permission within 3 years.’ The figures provided for Fenland within this document set out that there are 3 entries on the current register which is significantly lower than other local authorities, for example in Greater Cambridgeshire there are 737 entries on the register.

Given there is no identified need for the provision of further self-build housing above that that is already coming forward, criteria point ‘c’ is unjustified and should be deleted from the plan.

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

Comment	Object
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Part F of draft policy LP12 in relation to M4(2) should include a viability allowance. The draft policy is not sound without this amendment as it is not justified.

Where viability is a valid consideration it will impact M4(2) requirements as much as the other requirements (i.e. M4(3)) where a viability allowance is made.

LP13: Custom and Self Build

Title:

Position:

First Name:

Organisation:

Barratt and David Wilson Homes Cambri

Surname:

Comment

Object

Policy LP13 sets out that for sites of 100 dwellings or more at least 5% of dwellings on site should be provided as self or custom build homes. Whilst no objection is raised to this, it is considered that the requirements for self-build are dealt with under Part A and Part B of the policy. From experience those interested in self-build tend to prefer bespoke plots, rather than being part of larger developments. It is also more difficult to control design quality for self-build plots.

However, custom build is appropriate to be provided on larger sites of 100 dwellings or more. The policy is considered to be appropriately worded to allow for conventional market housing to be developed in instances where there is lack of demand for custom or self-build dwellings.

Title:

Position:

First Name:

Susie

Organisation:

St John's College Cambridge

Surname:

Wood

Comment

Object

The supporting text demonstrates that planning permissions being granted "comfortably" meet the demand for self-build and custom housing. There is therefore no justification for the requirement for proposals for 100 or more dwellings to provide serviced plots to deliver at least 5% of the total number of dwellings on the site as self-build or custom build homes.

Title:

Position:

Director

First Name:

Becky

Organisation:

Johnson Mowat

Surname:

Lomas

Comment

Object

LP13: Custom and Self Build

2.4.1 It is not considered that Part C of the policy, the requirement for 5% self-build housing through sites of 100 dwellings or more, is justified or consistent with the Framework.

2.4.2 Johnson Mowat work in a number of Local Authority areas that have already adopted such policies and our experience is that such provision does not work. Those seeking self-build and custom build plots are not looking for development plots within larger housing estates. Windfall, small sites and sites dedicated to self-build and custom build are more likely to result in the successful delivery of sites to meet the needs of those on the Council's self-build register.

2.4.3 It is noted that the HBF have made appropriate representation on this matter, specifically regarding the evidence for custom and self-build need. Johnson Mowat support the HBF's position on this matter.

2.4.4 In order to rectify this matter Part C of policy LP13 should be deleted.

LP13: Custom and Self Build

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

Comment Object

You qualify the comment in para 13.60 of supply being sufficient for demand on the basis of those that sign off for the Self Build and Custom register. Our experience is that those registering are a very small proportion of Self Build demand. Demand for Self Build plots is strong and supply diminishing as windfall sites are exhausted. It is essential that a supply of self build plots is maintained by way of windfall sites in and around settlements. My representations regarding Policy LP1 Part C submitted separately refer to policy change that would accommodate this.

It is proposed that the wording of LP13 is amended to allow self build as infill of rounding off sites around the edges of settlements in accordance with the changes proposed to LP1 and with special weight in favour given to proposals to be delivered in such locations as self build homes, to accord with the intentions of The Self Build and Custom Housebuilding Act 2015

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

Comment Object

Part C of the policy is unsound as it is not justified.

Whilst the HBF support the encouragement of self-build housing through local plans, we do not consider the requirement for all development of 100 or more dwellings to set aside 5% dwellings to be delivered through serviced plots for self-build and custom housebuilding to be justified or consistent with national policy.

As the Council will be aware the proposed policy must be based on robust evidence of both the demand for self-build plots and a consideration as to the impact on viability of this policy. In paragraph 13.59 of the supporting text to this policy the Council notes that permissions granted for self-build homes comfortably meet the demand for self-build plots. The evidence from the self-build register also suggests that whilst there are households looking to build their own homes there are few barriers to finding plots. Table 122 of the Housing Needs for Specific Group paper indicates a net need per annum of just 1 self-build plot and suggests that there is a sufficient supply of self-build plots in Fenland.

This has been achieved without the need to require large developments to provide these plots and through the implementation of policy such as those in LP1 that allow for self-build plots to come forward more frequently than in other areas. Given that there seems to be sufficient opportunities for self-builders to acquire sites across Fenland it cannot be justified for the Council to require sites of 100 or more units to provide at least 5% of the homes on site as self-build plots.

Recommendation

That Part C of LP13 is deleted.

LP13: Custom and Self Build

Title: **Position:** Senior Planner

First Name: Victoria **Organisation:** Gladman

Surname: Demetriou-Smith

Comment **Support**

Policy LP13: Custom and Self Build, Part C: Provision of plots on site of 100 dwellings or more requires all sites of 100 or more dwellings to include provision of plots for self-build and custom housing as part of an appropriate mix of housing. Gladman broadly support the inclusion of a policy in respect of self-build and custom build housing in line with current government thinking and objectives.

We consider it essential that the policy wording retains the stipulation that once a self-build and/or custom-build plot has been marketed for 12 months but failed to sell, it will revert to consideration by the Council to be built out as conventional market housing. However, there is an error in the final sentence, which should read '[...] subject to detailed permission being secured and the Council being satisfied that a thorough marking exercise has been carried out.'

Title: Ms **Position:** Chartered Town Planner

First Name: Shanna **Organisation:** Swann Edwards Architecture Limited

Surname: Jackson

Comment **Support**

This policy is welcomed. However as before there appears to be no allocation or identification in the Policies Maps to show where infill frontage development or periphery self-build plots will be supported and no mechanism to secure self-build plots has been outlined.

LP14: Gypsies and Travellers and Travelling Showpeople

Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment	Support		
We welcome criterion d and the reference to the historic environment.			

Title:	Mr	Position:	
First Name:	Colum	Organisation:	Cambridgeshire County Council
Surname:	Fitzsimons		
Comment	Neutral		
It is recommended that bullet point f is amended to include a requirement to ensure that the site is capable of being serviced by waste collection services.			

Title:	Mrs	Position:	
First Name:	Susan	Organisation:	
Surname:	James		
Comment	Object		
I support the objections of the British Horse Society to this policy.			

Title:	Ms	Position:	Chartered Town Planner
First Name:	Shanna	Organisation:	Swann Edwards Architecture Limited
Surname:	Jackson		
Comment	Support		
We consider that part b) contradicts the opening statement in that the former supports the gypsy, traveller, and travelling showpeople sites only on the basis if the Council cannot show a 5-year supply of deliverable sites whereas the latter states that sites will be granted irrespective of whether a need is established.			

Title:	Mrs	Position:	Parish Clerk & RFO
First Name:	Sarah	Organisation:	Wisbech St Mary Parish Council
Surname:	Bligh		
Comment	Neutral		
Travelers Plots - The Parish has an abundance of applications regarding caravan plots for travelers, the Parish Council recommends the urgent completion of the GATNA for correct assessment of these applications.			

LP14: Gypsies and Travellers and Travelling Showpeople

Title:	Councillor	Position:	
First Name:	Gavin	Organisation:	Parson Drove Parish Council
Surname:	Booth		
Comment	Neutral		
LP 14 – Need to complete the GATNA as soon as possible for this policy to work.			

14: Employmnt

Title:		Position:	
First Name:	Lynda	Organisation:	
Surname:	Warth		
Comment	Object		
'Existing Employers and Rural Enterprises			

14.13 To support the creation and expansion of local businesses, existing employment sites and areas are afforded flexibility to grow by Policy LP15. Fenland’s strategy for employment growth recognises that growth for certain types of businesses will need to take place outside of designated EEAs, site allocations and defined settlement boundaries. Some sectors, such as Agri-food, Horticulture and Tourism, may justifiably require a countryside location and can be supported where it is demonstrated that the scheme is sustainable and appropriate. The Development in the Countryside policy (LP18) sets out specific requirements for proposals located outside of settlement boundaries.'

The equestrian industry should be recognised and included within this group as it provides jobs and diversification opportunities for rural landowners. It can also feed into the tourism industry. All equestrian enterprises rely on a good rural bridleway network therefore the bridleway network should be recognised as a catalyst to both employment and tourism opportunities and financially supported and encouraged through S.106 and other funding pots.

Title:		Position:	
First Name:	Liz	Organisation:	ICIS consulting limited
Surname:	Dent		
Comment	Object		
Para 14.9 Table 5 EEAs			
Table 5 -Reference EEA1 - Honeysome Industrial Estate- description of Main Characteristics is incorrect- should include reference to the retail present on the site. Proposed description as follows -Provides a mix of uses, including industrial units (B2, B8), with some units offering trade counter services, supermarket and comparison retail (E(a)).			

LP15: Employment

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

Comment **Support**

Comments on individual site allocations are made in Appendix B.

We welcome criteria g, r and s

Title:		Position:	
First Name:	Richard	Organisation:	Cambridge Property Group Plc
Surname:	Sears		

Comment **Neutral**

This site is located directly adjacent to EEA8 (March Enterprise Park).

The site is adjacent to an existing employment area, which was identified as a broad location for growth by the Fenland Local Plan 2014.

It is also located adjacent to proposed allocation LP40.05 (40290) which is considered to form an extension to EEA8.

The allocation of this site supports the Council's growth strategy and will significantly boost employment growth and job creation.

Policy LP15: Employment Part A - Established Employment Areas (EEAs) states that:

EEAs offer potential for intensification and renewal through new employment development. Proposals for employment development including B2, B8 and E(g) Use Classes within or adjoining an EEA will be supported where the proposal demonstrates there is or will be sufficient capacity in the local and strategic highway network to accommodate the proposal.

The Policy also states that Proposed extensions to EEAs through the development of adjoining land (including land outside settlement boundaries) will be supported where the proposal: a) Is proportionate in scale to the existing EEA; and b) Provides a clear, defined boundary which maintains or enhances local character and the EEA's landscape setting.

There is sufficient capacity within the highway network to support this proposed allocation of an extension to LP40.05. The development of this land would also be commensurate with the existing EEA's setting.

LP15: Employment

Title:		Position:	
First Name:	Victoria	Organisation:	Barton Willmore
Surname:	Yeandle		

Comment **Support**
Metalcraft supports the Policy.

Metalcraft is pleased that the Site has been allocated in the draft Local Plan. Its situation adjacent to an Established Employment Area (the current Metalcraft) site demonstrates its suitability. As the Policy states that the focus for employment should be within sites allocated for employment, it is supported. Metalcraft is committed to enable the delivery of high-quality employment floorspace to support Chatteris, Fenland and the wider Cambridgeshire region.

LP15: Employment

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

LP15: Employment

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:	Mr	Position:	
First Name:	John	Organisation:	Maxey Grounds
Surname:	Maxey		
Comment	Object		
14.7 – 14.11 and Table 5 and LP15			

Whilst we understand and support the intention to protect existing employment Areas, it is our view that

- 1) this should not prevent changes in the type and nature of the employment activity that takes place in such areas.
- 2) The list of Employment areas needs to be comprehensive. To this end there are several obvious omissions and the designations that are said to appear on the maps are barely visible in some cases where the site is also a purple allocation, and existing employment complexes such as for example Leverington Road Distribution depot, Lynn Road / Mount Pleasant factory area are excluded . If this is intentional then explanation as to why such areas are not to be protected is required.

LP15: Employment

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.

Title: Mr

Position:

First Name: Colum

Organisation: Cambridgeshire County Council

Surname: Fitzsimons

Comment **Object**

The Policy refers to Use Class E(g). Use Class E(g) is not a defined use class within the legislation; Use Class E encompasses all the uses listed within the Use Class E and changing between the uses within Use Class E is not considered to be development. Unless restricted by condition, there will be no restrictions on introducing potentially inappropriate uses, such as nurseries and doctors' surgeries into industrial areas permitted with Use Class E uses. Careful consideration should be given to identifying industrial areas suitable only for use classes B2/B8 and those suitable for B2/B8/E; or identifying by policy a mechanism so that only the specific use E(g) is permitted. Waste management are more suited to areas without Use Class E land uses, and Policy 4 the MWLP directs waste development to industrial areas in the first instance.

This is a strategic concern to the MWPA and a Statement of Common Ground may be appropriate.

Title:

Position:

First Name: Lynda

Organisation:

Surname: Warth

Comment **Object**

The equestrian industry should be recognised and included within this group as it provides jobs and diversification opportunities for rural landowners. It can also feed into the tourism industry. All equestrian enterprises rely on a good rural bridleway network therefore the bridleway network should be recognised as a catalyst to both employment and tourism opportunities and financially supported and encouraged through S.106 and other funding pots.

LP15: Employment

Title: Councillor

Position:

First Name: Gavin

Organisation: Parson Drove Parish Council

Surname: Booth

Comment **Object**

LP 15 – Employment does not adequately address the need for small business units with associated housing, which would be sustainable. fails to address the shift to working from home.

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.

15: Town Centres

Title:		Position:	
First Name:	Liz	Organisation:	ICIS consulting limited
Surname:	Dent		
Comment	Object		
Para 15.17			
Threshold in respect of requirement for Impact Assessment should be increased to 1,000 sqm (draft proposes 500 sqm which is too low). Increase is more inline with National Policy threshold of 2,500 sqm.			

LP16: Town Centres

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

Comment **Neutral**

Comment – As discussed in Policy LP 17: Culture, Leisure, Tourism and Community Facilities, below, it is considered that more improvements to the river setting and corridor would enhance the relevant Fenland towns and villages potentially attracting people to the area.

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

Comment **Object**

There is inconsistency within the policy in comparison with Policy LP15 D in relation to the length of time a property should have been marketed for prior to permitting a change of use.

It is suggested the Plan policies should be consistent and require marketing for 6 months (as per LP15 D) rather than 12 months as per LP16 E\$

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

Comment **Object**

Yet no mention of the rights of way network. Totally unacceptable.

This should be multi user access to include for equestrians including carriage drivers. Fenland has a great opportunity to develop as a significant and important equestrian area but the infrastructure must be in place and supported in terms of maintenance and include all the previous comments.

Title:	Mrs	Position:	
First Name:	Susan	Organisation:	
Surname:	James		

Comment **Object**

I support the objections of the British Horse Society to this policy.

LP16: Town Centres

Title:

First Name: Liz

Surname: Dent

Position:

Organisation: ICIS consulting limited

Comment **Object**

Part D
Threshold in respect of requirement for Impact Assessment should be increased to 1,000 sqm (draft proposes 500 sqm which is too low). Increase is more inline with National Policy threshold of 2,500 sqm.

Title:

First Name: Ian

Surname: Hewitt

Position:

Organisation:

Comment **Object**

People's shopping habits have changed & the model of town centres populated by a variety of retail outlets is no longer sustainable. The LP acknowledges this in 15.4, but does not have a vision for what our town centres will look like. It's a widespread problem & someone in another local authority should have done some work on the change & how to manage it. We need a exciting pro-active vision for our town centres rather than a reactive delegation to developers.

Title:

First Name: Daron

Surname: Wild

Position:

Organisation:

Comment **Neutral**

LP16 and LP10 talk about High Streets and the appearance of shops. I live on Chatteris High Street. I would like thought given to enhancing the High Street so it more reflects Ely High Street as a beautiful destination. If it was to become a one way system with the unused lane pedestrianised this would showcase the shops much better. It's just full of parked cars blocking the view of the shops, most parked with engines running, radios blasting and phone calls through their speakers. The High Street is busy with cars, but most don't stop to shop, they are just getting from A to B. Other than a couple of disabled bays, or electric car charge bays or delivery drop off zones, all parking should be in the free car parks.

If the Anglian Water Reservoir goes ahead, this will be a great opportunity to include Chatteris as a place worth visiting.

Title:

First Name: Anja

Surname: Borgman

Position:

Organisation:

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

16: Culture, Leisure, Tourism and Community Facilities

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

Comment Object

'16. Culture, Leisure, Tourism and Community Facilities
16.1 A priority of the Fenland Leisure Strategy (2017)⁵⁸ is to ‘provide an efficient, sustainable leisure centre service, focused on getting more people, more active, more often’.'

Yet no mention of the rights of way network. Totally unacceptable.

LP17: Culture, Leisure, Tourism and Community Facilities

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

Comment Object

Comment –

a. It has been acknowledged for some time that the Fenland area is lacking in suitable open spaces such as Country Parks and this became particularly apparent during the COVID-19 pandemic. The recently announced Fens Reservoir may assist once it is completed towards the end of the plan period.

b. Most of the watercourses within your Council's area are navigable but the main waterways are the Old River Nene (ORN), Whittlesey Dyke and Kings Dyke (Bower River) which form part of the Nene-Ouse Navigation Link.

c. It is disappointing to note that the contents of Policy DM8 – Riverside Settings contained within the Delivering and Protecting High Quality Environments in Fenland Supplementary Planning Document adopted on 24 July 2014 do not appear to have been included in the draft Local Plan 2021-2040.

d. It is considered that the undertaking of a water frontage or a water space strategy to identify suitable locations for the provision of moorings, marinas or other related enhancements would be beneficial for the district.

e. The Commissioners promote the navigable rivers within their area provided that they do not detrimentally affect our statutory conservation, water level and flood risk management functions and relevant policies. Whilst some improvements have been achieved in recent years the Commissioners continue to urge the relevant planning authorities to give serious consideration to enhance the setting, access, use and opportunities associated with the water front settings, navigable rivers and associated river corridors that pass through its area in order to make a positive impact on the largely rural economy and promote the district as a boating destination.

f. The Commissioners would be pleased to work with the District Council and/or developer/promotor to identify opportunities to maintain and enhance the navigation experience. Examples of this are the recent uprating and improvement of the moorings at Ramsey Basin as part of the larger Ramsey Northern Gateway proposal, within Huntingdonshire, and around Town Bridge as part of the ongoing March Future High Streets Fund.

g. Since the introduction of The Fenland Local Plan (May 2014) the Commissioners have promoted a Private Bill through the House of Commons and the House of Lords which received Royal Assent in November 2018. The new Act contains important provisions on charging allowing the Commissioners to properly regulate navigation on the waterways and provide a system of registration for vessels using the waterways. These powers are similar to those used by other large inland navigation authorities.

The Act also gives the Commissioners the important power to make Byelaws in relation to the river corridor facilitating the maintenance and improvement of the waterways for the purpose of recreation and leisure pursuits, for controlling the navigation of the waterways and to regulate the conduct and activities of persons using the waterways.

As a result, the Commissioners have recently introduced a Licensing Scheme which it is hoped will contribute to the maintenance and improvement of this system but with the exception of meeting the minimum requirements of the Inland Waterways Association (IWA), there are currently no definitive plans or programme in respect of navigation related activities at this time.

However, the Commissioners have been informally collecting views from navigators on what they would most like to see delivered in the next few years. One request that has come through strongly is the provision of simple rural mooring sites where boaters can stop for a while during the day or overnight.

h. It is anticipated that the Great Fen Project and the recently announced Fens Reservoir will, as they develop, increase navigation on the Commissioners' system and may, as a by-product, increase leisure, recreation and tourism use within your Council's area.

LP17: Culture, Leisure, Tourism and Community Facilities

i. The southern link of the ‘Fens Waterways Link’ remains an aspiration. Historically, the Commissioners have raised concerns about the increased activity and tourism presented for this area in the original project report but the Commissioners and other stakeholders are constantly reviewing opportunities to promote this “link” which will require significant investment.

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

Comment **Support**

We welcome the support this policy will provide for community facilities that will Prioritise and promote access by walking, cycling and public transport, for the benefits this could provide for people’s health, nature, air quality and climate change. However, we suggest framing this policy around opportunities to link in with the culture, leisure, tourism and community enhancements that will be delivered through Anglian Water’s Fens Reservoir proposal. Fenland District Council is in a unique position to encourage development that will deliver complimentary benefits for people and nature within a wide zone of influence of this significant project and the ecosystem services it aims to provide.

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

Comment **Neutral**

The Library service recommends that wording of Policy LP17 is amended to include reference to the co-location of library and other customer facing public services, where appropriate, as both a cost effective and benefit for residents. This would enable leisure services delivered alongside health and wellbeing. Increasingly libraries providing services on behalf of both public health and NHS and reflect this trend.

It is further recommended that the section covering Loss of Culture, Leisure, Tourism and Community Facilities is also amended. The Library service requires the flexibility to rationalize and move facilities as part of new development in established communities if the development draws away natural use/footfall away from an existing site.

An additional bullet is suggested:

- Proposals include provision that is more accessible and better suits needs of the wider community.

LP17: Culture, Leisure, Tourism and Community Facilities

Title:		Position:	
First Name:	Lynda	Organisation:	
Surname:	Warth		
Comment	Object		
'• Prioritise and promote access by walking, cycling and public transport. Community facilities may have a local or wider catchment area: access should be considered proportionately relative to their purpose, scale and catchment area;'			
This should be multi user access to include for equestrians including carriage drivers. Fenland has a great opportunity to develop as a significant and important equestrian area but the infrastructure must be in place and supported in terms of maintenance and include all the comments above.			

Title:		Position:	
First Name:	Patricia	Organisation:	
Surname:	Brooks		
Comment	Support		
This policy states that a loss of an existing community facility will ONLY be acceptable if an alternative provision exists. The site at Wenny Meadow has formed a green open space for the community for years, and there is strong local support to retain it as an amenity. Efforts should be made to work with the landowner and developer to PLAN its retention as a community facility to promote health and wellbeing through open space and interaction with nature.			

Title:		Position:	National Planning Adviser
First Name:	Tom	Organisation:	Theatres Trust
Surname:	Clarke		
Comment	Neutral		
We welcome the premise of this policy in supporting and protecting the district's valued facilities. To improve the effectiveness and robustness of the policy with regards to loss we suggest revision.			
The first criteria could inadvertently result in facilities being undermined through lack of investment or even deliberate harm to artificially bring about being no longer fit for purpose. We suggest a better measure would be for a requirement to submit evidence of marketing for a period of at least twelve months at a realistic market price/rent for existing use and condition without development potential. We would also urge caution on the second criteria because the presence of nearby similar provision may not necessarily mean the offers of both are compatible, and that existing uses and communities within one could be absorbed by the other.			

17: Development in the Countryside

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

Comment **Neutral**

Para 17.1:
Include ‘nature conservation’ as a land-use which may be acceptable in the countryside – this may not always include public access. Habitat creation and management is a necessary land-use in the Fenland countryside if the authority is to meet its stated environment objectives.

Title:		Position:	
First Name:	John	Organisation:	
Surname:	Revell		

Comment **Support**

Para 17.17
This is a correct statement on the importance of agriculture to Fenland and to UK.

LP18: Development in the Countryside

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

Comment Object

Part H of the policy should include provisions whereby if a landowner does not intend to continue the use of the site for agricultural purposes, development shall be permitted providing it meets the other policy criteria within the Local Plan.

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

Comment Support

Natural England supports the general thrust of this policy to restrict development to that which is demonstrably essential to the effective operation of local agriculture, forestry, outdoor recreation and access to natural greenspace and does not adversely affect the open countryside, designated sites and best and most versatile (BMV) land.

As with other policies it should be recognised that BMV land across much of Fenland comprises peat soils, an important natural carbon sequester which is so important in the fight against climate change, for air quality and to help recover nature through environmental enhancement opportunities. The policy should promote and encourage agricultural diversification and other proposals that embed protection and enhancement - habitat creation projects that could contribute towards and link in to the enhancements that will be delivered through the Fens Reservoir proposal to provide health, wellbeing and recreational benefits for people in addition to enhancements that will contribute towards nature recovery and climate change mitigation.

LP18: Development in the Countryside

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

Comment	Object
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Policy LP18 does not align with policy LP6 and this needs to be rectified in the post-submission version of the Plan. Almost all utility scale renewable energy projects, require open countryside locations, and yet they are not identified in Policy LP18 as an acceptable form of development in the open countryside.

It is counterintuitive to have a positively worded policy seeking to deliver renewable energy projects and associated infrastructure, yet not confirming that they are an acceptable use within the open countryside.

It is noted that the Council will encourage rural diversification projects yet fail to acknowledge that renewable energy projects provide excellent diversification opportunities for farming enterprises. The money that landowners obtain from leasing agreements can be ploughed back into their wider farming enterprises, which can secure their long-term future and also enable potential expansion.

As drafted, we object to the currently wording of Policy LP18 as it is not aligned with other keys policies within the plan, namely LP6.

Paragraph 17.17 outlines that much of the land in Fenland is BMV and is one of the most significant agricultural areas in the UK. It therefore aims to protect BMV land from being developed on. LSbp support this notion in principle, however, there are concerns with Part H of the policy.

Through our site selection process, LSbp avoids BMP land wherever possible and as previously mentioned over 90% of the area we use for our sites is on 3b land and below. However, there are local authority areas where there are high levels of best and most versatile land with grid capacity capable of accommodating utility scale renewable energy developments. If the grid connection is surrounded by best and most versatile land this should not preclude development, the Government's Written Ministerial Statement of 2015 does not advocate this approach for this very reason. The availability and proximity to a grid connection with sufficient capacity is critical to the delivery of renewable energy projects and this is the key driver when finding sites. There will inevitably be instances where best and most versatile land and the Council's approach of a blanket ban on solar development is not in accordance with Government guidance and as such is unsound.

There are also instances where non-best and most versatile land is interspersed with best and most versatile land, and this should not lead to an immediate refusal of an application. The practicalities of the situation have to be considered, for example, a farmer would not farm a parcel of land that is surrounded by solar panels. Paragraph 17.7 dictates that developments "which would individually or cumulatively result in a significant loss (one hectare or more) of best and most versatile agricultural land will also need to demonstrate that there are no other suitable alternative sites which could accommodate either all or part of the development on either previously developed land, or land within the built up area of existing adjacent or nearby settlements, or on poorer quality agricultural land" as set out in part H of LP18. Historically, appeal decisions have referred to the significant loss of BMV land as 20 hectares, whilst it is not defined in planning policy neither is a one hectare threshold. The council needs to provide robust evidence as to how and why they deem the loss of one hectare of BMV land as significant. Moreover, the policy to which the paragraph refers to does not provide any details of 1 ha loss of BMV land, meaning the plan's guidance is inconsistent with its policy.

In evaluating alternative land sites in these instances, LSbp believes this would best be done on a case-by-case basis. However, the council should generally consider the following when evaluating alternative land sites in regard to solar:

- Landscape impacts set out in LP7 and LP28
- Potential impacts on ecological designations such as SSSI's in line with LP7, LP24, and paragraph 174 (b) of the NPPF
- Traffic impacts set out in LP7 and LP20
- Grid connection availability for the land and the environmental and financial impact of constructing a cabling route

LP18: Development in the Countryside

to connect to the new site location if necessary

If alternative sites cannot be feasibly interconnected into an existing proposal, and without significant additional costs for the developer, the local plan cannot be considered sound in respect to solar as it fail all four tests of soundness outlined in paragraph 35 of the NPPF.

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

Anglian Water welcomes the accepted principle that development by the utility services is often required in the open countryside, as we supply critical infrastructure to new and existing communities and businesses and therefore can be proven to be demonstrably essential. We would welcome an amendment to the policy to include this approach so utility infrastructure is acceptable in principle in the open countryside.

Alternatively, Policy LP19 Strategic Infrastructure could clarify that where utility infrastructure is supported in principle, this includes infrastructure development in the open countryside.

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

It is recommended that Part A is amended to include a bullet requiring that suitable access is available to public services, most notably waste collection vehicles.

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

The Infrastructure Delivery Plan should set out any improvements needed to flood risk management infrastructure to deliver planned growth in flood risk areas.

LP18: Development in the Countryside

Title: **Position:** Senior Planner

First Name: Victoria **Organisation:** Gladman

Surname: Demetriou-Smith

Comment **Object**

Under Policy LP18: Development in the Countryside stipulates what forms of development will be supported within the countryside, as defined by Policy LP1, Part B. Development in the Countryside is only permitted in a narrow set of circumstances such as replacement dwellings, meeting the needs of rural workers, and dwellings of exceptional design quality.

As previously stated, Gladman are opposed to the use of settlement boundaries and accompanying restrictive policies regarding development beyond settlement boundaries (therefore within the countryside) as these are often used as an arbitrary tool to prevent otherwise sustainable development. Neither policy (LP1 AND LP18) contains suitable wording to allow for sufficient flexibility to respond to changes of circumstance such as shortfall in housing land supply.

In accordance with NPPF paragraph 11d, when a five-year housing land supply cannot be demonstrated, the most relevant policies in the plan would be out of date and the presumption in favour of sustainable development would apply. This policy may therefore be judged to be inappropriate because it adds restrictions which may prevent sustainable sites from coming forward.

Gladman recommend that Policy LP18 (and LP1, accordingly) is modified and worded more flexibly to ensure compliance with paragraphs 11 and 16(b) of the Framework and the requirement for policies to be sufficiently flexible to adapt to rapid change. We suggest the addition of the following:

'Part G: Additional Housing Adjacent to Settlement Boundaries Proposals for additional housing adjacent to defined settlement boundaries will be support in circumstances where the Council cannot demonstrate a five-year housing land supply.'

The implementation of this additional part is crucial to ensure that housing needs are met in full over the plan period.

Title: **Position:**

First Name: Lynda **Organisation:**

Surname: Warth

Comment **Object**

Flawed by the process – no stakeholder engagement as to what should be required in the S.106 provision and lack of knowledge by Planners of the difference between walking and cycling and active travel provision. Please note the previous comment above concerning S106.

To comply with the CPCA LTP this needs to be Active Travel provision to include equestrians to support the Fenland equestrian industry and to meet the requirements of the Cambs ROWIP, the changes to the Highway Code, the Road User Hierarchy, the advice by the BHS Director of Safety.

Wisbech Rail: Must include NMU path for all user groups including carriage drivers. Only narrow wheeled cyclists need hardtop, everyone else needs soft surfaces. This feeds into the active travel strategy, rural jobs, diversification for farmers, tourism, health and well being. Public money must be spent to benefit the maximum number of users.

18.44 Needs to be multi user routes for all reasons above.

LP18: Development in the Countryside

Title:	Mrs	Position:	
First Name:	Susan	Organisation:	
Surname:	James		
Comment	Object		
I support the objections of the British Horse Society to this policy.			

Title:	Ms	Position:	Chartered Town Planner
First Name:	Shanna	Organisation:	Swann Edwards Architecture Limited
Surname:	Jackson		
Comment	Support		
We are supportive of this policy as it allows for greater flexibility for replacement dwellings, particularly where historic smaller properties do not allow for modern day living. We would ask for clarification as to whether the ‘large prestige homes’ statement is applicable in any location in the countryside or if it is limited to replacement dwellings only.			

LP18: Development in the Countryside

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 settlement edge to serve the settlement March, especially if this segment of the overall Policy LP9 allocation is

LP18: Development in the Countryside

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:	Hufton		
Comment	Object		
Looking to deliver a world class transport network for Cambs and Peterborough. Rural transport is already almost non existant and now Stagecoach are making noises about reducing the number of routes that service villages, making the 'world class' statement a complete farce. When will rural routes be taken seriously so we can follow government guidance and take more cars off the roads?			

18: Transport and Infrastructure

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

18.42 Whittlesey Relief Road, p.78

This section outlines the findings of the Inception Report. However, we believe that the wording should point out the proximity of the northern route option to the Nene Washes SPA/SAC/Ramsar and the strict protections imposed by the Habitats Regulations which may impede the viability of this route.

Title:		Position:	
First Name:	Andrew	Organisation:	
Surname:	Hammond		
Comment	Neutral		

Back in the early 90's there was an opportunity to build a second bridge over the Nene between the former Ridgeons site off Creek Road and the corner of Ellwyn Road (Neither site was developed then) and a one way system put in place which would have allowed for half of Broad Street to be closed off (something like the current proposals). Due to a lack of foresight this was missed and now we have little in the way of prospects for any kind of relief road. This has impacted on the town and its ability to develop in size. The proposals in the plan to provide 2746 new dwellings in March would appear to be entirely unsustainable unless a plan to solve the bridge issue is found. The plan does not seem to address this issue and appears to therefore be fundamentally flawed.

Title:		Position:	
First Name:	Andrew	Organisation:	
Surname:	Hammond		
Comment	Neutral		

March formed a neighbourhood Plan after a consultation period in 2017. As part of the consultation, I provided comments which included the forming of walking/Cycle routes through and around the town of March. This suggested linking existing routes to other fringe areas around March effectively encircling March and the interconnecting routes through forming the spokes. (I even drew it out on the plan they provided.) It was based on minimising contact between pedestrians/cyclists and vehicular traffic. If we want people to be fitter, safer and in a greener society then this is the sort of policy that should be formulated in a plan that takes us through to 2040 otherwise we will not be any further forward even then.

18: Transport and Infrastructure

Title: _____ **Position:** _____

First Name: Lorraine **Organisation:** _____

Surname: Moore

Comment **Object**

Community Infrastructure 18.8 - CIL would normally support this but the plan identifies that new developments cannot and so this will be considered by the IDP.

My understanding and first-hand experience in Wisbech is that all 3 GP surgeries are taking on additional patients (as they receive funding to do so) but the current service to existing and new patients is one of the worst performing in the country.

All primary and secondary schools are full and the new school will alleviate some of that. The majority of the school sites can't expand because of their location and those that have (Orchard Primary) have struggled and continue to struggle. July 2022 Ofsted rating: Requires Improvement.

Therefore whilst I support the plan in terms of trying to improve the whole of Fenland my concern is that without the right infrastructure the current problems will only be exacerbated and will reach critical mass, particularly in Wisbech. The North of the area has always suffered and numerous agencies and governments have acknowledged this but without funding and services at a local level the situation will never change. There have been numerous projects and initiatives in my time as a resident some successful some not so, but they have always been too management heavy with insufficient ground staff in the local community responding to and engaging with residents to model and encourage positive change.

Title: _____ **Position:** _____

First Name: John **Organisation:** _____

Surname: Revell

Comment **Object**

Paras 18.15 to 18.23 describe many of the problems of accessibility and transport but needs beefing up as do the possible solutions. An hourly train service from March and a 2 hourly service from Manea and Whittlesey is not "a good service", particularly if, as I have found, it is unreliable.

Title: _____ **Position:** _____

First Name: Richard **Organisation:** _____

Surname: Hibbert

Comment **Support**

Page 76 18.38

The Whittlesey Relief road is essential to remove HGV from Inhams Road and Station Road as they are not capable of coping with the number of vehicles accessing the Industrial Estates to the east of the Town.

18: Transport and Infrastructure

Title:

Position:

First Name: Alan

Organisation:

Surname: Bessant

Comment **Object**

LP20 Accessibility and transport – Page 74 18.16 refers to road maintenance issues due to roads being constructed on peat soils. RoadCem is a soil stabiliser that if used in Fenland could save us millions when building new roads. The council seems stuck on local aggregates as the only solution but the Netherlands has innovative and much cheaper solutions. Their advice certainly helped us with the drainage of the area so we have used their technology before with some success.

LP20 Accessibility and transport 18.21 page 75 refers to the Whittlesey bus service. This has been greatly reduced and is under threat. That should now be reflected in the report.

LP20 Accessibility and transport - 18.38 (page 77) mentions the need for a Whittlesey relief road. The amount, size and weight of traffic (HGV) is increasing and it runs through the centre of the town. This also brings dust and noise problems. As the economy grows this will increase. 18.42 (page 78) talks about the need for a strategic outline business case. This needs more emphasis in the report. It is critical for the development, health and well-being of Whittlesey. It needs to be more than a recommendation. Aggregate and IBA laden HGVs thundering past is not compatible with a Fenland market town and a vibrant piazza feel in the square – page 130 24.33 (maybe a vibration feel from the trucks would be more accurate!) It is hard to accept this vision given the types of polluting industries and increase in traffic being encouraged so close to the town centre. Also, the failure after nearly 20 years to deliver the restoration of the former Hanson brickworks at Saxon Pit.

Title:

Position:

First Name: Clive

Organisation:

Surname: Vaughan

Comment **Support**

Paras 18.38 - 18.42

Whittlesey is being deluged by ever growing volumes of HGV traffic. In September a resident in West End counted 700 lorries passing his house over a 12 hour daylight period. This traffic comes from activities in Saxon Pit (Jenkinsons) plus the never ending saga of buttressing the east face (started 2002!!) and in following up on Environment Agency instructions to bury 122,00 tonnes of illegally dumped waste. However the growing numbers of companies that have moved into industrial estates off the Benwick Road - such as Next - also have contributed to this traffic increase. The Plan talks about a Southern Relief Road as a recommendation. NO NO NO! The SRR is vital to Whittlesey's future prosperity. The Plan needs to clearly state that Fenland District Council is fully committed to seeing this scheme moved on swiftly through the evaluation stages (Stage 1 has already been completed on behalf of Whittlesey Town Council) so that a fully costed scheme can be presented to the Department of Transport as soon as possible.

18: Transport and Infrastructure

Title:		Position:
First Name:	Steve	Organisation:
Surname:	Cornell	
Comment	Neutral	
<p>Public transport in Fenland is very poor. There is no way for people from March to attend evening events in Peterborough or Cambridge as the last public transport leaves too early in the evening. No amount of improvements to stations etc will resolve this - better links running later in the evening are the only solution. People will move away from March unless links are improved - non-drivers are unable to access any form of cultural entertainment.</p>		

Title:		Position:
First Name:	Aaron	Organisation:
Surname:	Parak	
Comment	Object	
<p>The focus on public transport needs to be reviewed, due to the poor road network and large distances to cover. Focus needs to be put on upgrading the road network before investing in buses.</p> <p>The scrapping of the Cambridge metro is a huge blow to the fenland area and would have be a great success in providing high quality jobs to the fenland towns</p>		

Title:		Position:
First Name:	Martyn	Organisation:
Surname:	Lancaster	
Comment	Object	
<p>18.23 Lack of integration between different bus, rail and community transport services make it difficult for residents without access to a car to travel to key educational and healthcare services, such as Peterborough City Hospital, which can act to increase the risk of social exclusion and reduce opportunities for our young people to travel elsewhere for education or training.</p> <p>18.17 For the majority of the district walking and cycling infrastructure is limited or entirely absent, which means that walking and cycling are often unattractive. Reliance on private motor vehicles increases congestion, harms air quality and health, and generates carbon emissions. But above you are putting for traffic on the road.</p>		

18: Transport and Infrastructure

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

Comment	Object
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Strategic Infrastructure (Page 72)

Comment - It should be appreciated that it is unlikely that the current level of government funding for water level and flood risk management projects will be available in the future. Therefore, it is likely that funding will be required from other stakeholders, potentially including your Council, if current standards of protection are to be maintained.

Transport Infrastructure (Page 72)

Comment – The text refers to several infrastructure documents and plans with which rather disappointingly neither the Commissioners nor its associated Boards have been asked to contribute toward i.e. CPCA Local Transport Plan (LTP), Fenland Cycling, Walking and Mobility Improvement Strategy, The Fenland Rail Development Strategy 2011-2031 Action Plan.

Therefore, it has not been able to provide positive input into these documents and provide guidance on the interests of the Commissioners and associated Boards which may have a detrimental impact on the implementation of these proposals.

Community Infrastructure (Page 73)

Comment – It is noted that item 18.8 refers to flood defences in the Fens as “community infrastructure” but it is contended that the flood defences provided by the various RMA involved is of a strategic and national importance hence its inclusion in the current Environment Agency National Flood and Coastal Erosion Risk Management (FCERM) Strategy. Without these defences The Fens would not be habitable in its current form.

Wisbech Rail (Page 77)

Comment – The Commissioners and the various Boards involved have been included in the evolution of this scheme but have suffered from poor communication and subsequent periods of silence which is rather frustrating and can make it difficult to plan for future resources and allocating costs in budgets and thus adversely impacts the rate payer.

There are several steps and discussions which must occur if work on the rail link is to begin in 2023.

Wisbech Access Strategy (Page 77)

Comment –

a. The Commissioners, on behalf of the Hundred of Wisbech IDB, have been included in the advancement of this strategy but like the Wisbech Rail proposal have suffered from poor communication and subsequent periods of silence which is rather frustrating and can be difficult to plan for future resources and allocating costs in budgets and thus adversely impacts the rate payer.

b. Further discussion and several steps including the need to seek consent will be required and, in order to enable better planning of future resources and to allocate costs, it would be beneficial if the proposed works were known in advance.

c. The reference to the Southern Access Road (SAR) is noted but it is understood that part of the construction work, notably at the north western (Cromwell Road) end will be undertaken as part of the larger Incinerator proposals, should it proceed. It is also understood that there will be a physical barrier preventing access to the section of New Bridge Lane/New Drove to the south east.

Whittlesey Relief Road (Page 77)

Comment – The contents are noted and it appears that yet again key stakeholders have not, to date, been involved in the delivery of the suggested new relief road scheme which is rather frustrating.

As a result, both the Commissioners and Whittlesey and District IDB respectfully request that they are meaningfully

18: Transport and Infrastructure

involved in this proposal as it progresses to ensure that any surface water, flood risk, navigation and biodiversity/conservation implications have been dealt with and resolved to their satisfaction before work commences on site.

Local Projects (Page 78)

Comment - The Commissioners, together with the March Boards, gave a response to a public consultation on the March Transport Study but are not totally aware of the current position or impacts that they may have on them.

Some further discussion and several steps including the need to seek consent may be required and, in order to enable better planning of future resources and to allocate costs, it would be beneficial if the proposed works were known in advance.

Public Rights of Way (PRoW) (Page 79)

Comment – Where possible footpaths, cycleways, street lighting and/or other street furniture should be positioned outside of any protected watercourse and the associated maintenance access strip.

The prior written consent of either the Commissioners or associated Boards may be required and they will wish, when appropriate, to be involved in any discussions at the earliest possible stage.

Consent will only be given for hard surfaced “pavements” where a formal hardened road exists and will require that the relevant structure is positioned away from the watercourse on the landward side of the road.

Title:	Mr	Position:	
First Name:	John	Organisation:	Maxey Grounds
Surname:	Maxey		
Comment	Neutral		
I think the reference to the works relating to Wisbech Access Strategy should include the timescale intended for such works because some strategic allocations are dependent on these works to progress ie the South Wisbech commercial and residential allocations. Please			

18: Transport and Infrastructure

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

Comment	Object
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National Highways welcomes the opportunity to comment on the Fenland District Draft Local Plan consultation which covers the period from 2021 to 2040.

National Highways is responsible for the operation, maintenance and improvement of the Strategic Road Network in England on behalf of the Secretary of the State. In the area within and surrounding Fenland District we have responsibility for the A47.

National Highways is a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents.

National Highways is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the Strategic Road Network (SRN) and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.

It is recognised that Fenland falls within the Cambridgeshire and Peterborough Combined Authority (CPCA) area which has ambitious proposals and funding relating to growth, economy, and infrastructure. These are reflected in the strategic priorities for the district. The vision of the Local Plan sets out the ambition for Fenland to grow by approximately 10,500 new homes and 18,000 new jobs through the allocation of 215 hectares of employment land between 2021 and 2040. The majority of growth will be focused on the four market towns, including Wisbech, which is situated on the A47.

The growth strategy outlines that Wisbech will be allocated with 12% of the overall housing requirement, accounting for 1,287 new dwellings. Wisbech would also account for 42% of the total land supply for employment with 89.72ha of available employment land.

At present based upon our review National Highways cannot establish whether the level of growth proposed can be accommodated on the SRN as the transport evidence base or the strategic transport assessment which support the plan are not provided. We therefore request the provision of the transport evidence base, appropriate strategic transport model assessment and any supporting modelling to be provided. This will enable us to undertake a full and robust assessment of the proposals and understand the potential impact on the safe and efficient operation of the SRN. National Highways is committed to continue to work with your authority in a collaborative and constructive manner to support the progression of the plan. As part of this work we will work with you to develop a greater understanding of the impact of the development upon the SRN.

It is noted that the draft submitted version of the local plan and identified allocations will increase the number of residents in proximity of the SRN. It is likely that these locations will be impacted by noise pollution from the SRN. National Highways will not allow noise barriers on its land.

The proximity of development close to the SRN also raises the potential for exceedances of air quality standards for which extraordinary measures in the form of permeant speed restriction may need to be considered. Several policies, and the local plan set out requirements for developments to reduce the impact on or improve local air quality this does not directly relate to the SRN and what mitigation may be required. We will continue to work proactively with yourselves on these matters policy which but would recommend a specific policy which identifies how air quality and noise impacts would be monitored and managed and what interventions may be required.

National Highways will not accept third party connections to its drainage systems, developments must not add extra run off to existing systems, and capacity will need to be checked and upgraded if necessary.

18: Transport and Infrastructure

We trust the plan above is useful in the progression of your proposals and welcome continued discussions with the council to this end. If you have any questions, please do not hesitate to contact me directly.

18: Transport and Infrastructure

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

Comment **Neutral**

We are pleased to submit an evidence base to help determine the social infrastructure requirements arising, in response to the planned growth envisaged by the Fenland Local Plan.

EEAST is an essential social infrastructure provider (and emergency service) who confirm that there will be an increased requirement for ambulance facilities necessitated by the planned housing and population growth arising within Fenland District.

Information outlining EEAST's key operational facts and service provision is outlined at Annex 1 below. The National Planning Policy Framework requires the planning system to provide for sustainable development through local authority plan making and development management processes, which should aim to achieve healthy, inclusive and safe places.

In promoting healthy lifestyles the planning system should provide the social facilities and services the community needs. It should take into account and support the delivery of local strategies to improve health and social wellbeing for all sections of the community, and ensure an integrated approach to considering the location of housing and community facilities and services.

As an essential social infrastructure provider EEAST has an important role to play in contributing to the achievement of sustainable new places (and along with its health and blue light partners) creating the conditions for healthy, safe and cohesive communities.

Population Increase & Demographic Profile

Population increase, along with deprivation, age and the increasing number of people living for longer with more complex long-term conditions, all impact on the level of ambulance service demand, in respect of both emergency and non-emergency patient transport services.

The age profile is also a key factor, as people at both ends of the age spectrum consume a disproportionately large quantity of healthcare services and resource. Those aged over 75 years are most likely to have multiple long-term conditions and complex care needs.

Analysis of EEAST activity from 2019/20 indicates residents aged 65 years and over account for over 1/3 (35%) of Category 1 ambulance activity and 52% of all activity. Those aged 2-18 years account for 15% of Category 1 activity and 8% of all activity.

EEAST's operational standards/ thresholds and response times are included for information at Annex 2.

EEAST will therefore require developer funding to mitigate the impacts arising on its service capacity - from the population increase associated with the planned housing growth in the Fenland area.

Planned Housing & Population Growth - Ambulance Facilities Funding Requirement & Budget

Calculations to identify the likely cost of ambulance facilities provision based on the growth levels in Fenland over the Plan Period 2021-2040 are set out below.

EEAST has 'discounted' all housing sites within Fenland which are identified as 'Committed Large Sites' and 'Additional Net Commitments' in Table 9 of the draft Plan.

Adopting this approach along with an average household size within Fenland of 2.3 (ONS 2011 Census) EEAST requires developer funding for additional ambulance facilities - to mitigate and manage the increased operational activity arising from the site allocations comprising 5,098 dwellings (11,725 population).

18: Transport and Infrastructure

This planned growth is distributed across Fenland's hierarchy of growth locations, with major growth principally directed to the Market Towns, Large and Medium Villages, which would impact on EEAST's operations within the local area, which are operating at capacity.

Development at each major housing growth location (above) would therefore lead to an increased draw on ambulance service capacity and resources across the Fenland area.

Based on the total (discounted) levels of housing/population growth to be planned for within the Fenland of 5,098 dwellings and 11,725 population (employing an average household size of 2.3) the following budget for ambulance facilities and funding arises:

- £1,529,400 – within the Fenland area based on a standard charge of £300 per dwelling;

In the absence of CIL, a 'standard charge' of £300 per dwelling is considered necessary to fund the increased operational capacity EEAST is likely to require through additional ambulance service provision.

EEAST acknowledges that the draft Local Plan and related housing sites have been the subject of viability testing, and would be content to be flexible in its approach to the level of funding to be secured for ambulance facilities.

Each planning application would therefore be assessed on its merits to determine the likely funding required, which if applicable, would be secured via agreement with the developer(s) through a planning obligation.

The range of infrastructure and facilities (comprising staff, vehicle fleet & estate assets) required to mitigate the impacts arising, and enable EEAST to maintain nationally mandated contractual response times and treatment outcomes, is summarised below:

- An increase in the number & type of ambulances;
- Provision of additional medical, pharmacy & IT equipment/digital software to manage the increased number of incidents arising from the new population;
- The recruitment, training, equipping & tasking of Community Responders based within the locality of development sites & their environs;
- Redevelopment or relocation of existing ambulance stations to a more suitable location to meet the increased local demand arising from housing developments.

Infrastructure Delivery Plan Recognition

This information therefore provides the basis for a Schedule of Ambulance Facilities (and a related budget) for inclusion in an update to Fenland's Infrastructure Delivery Plan (IDP), which the local plan site viability work can have regard to.

We trust this submission is of assistance in helping to determine the scope and level of social infrastructure provision (incorporating emergency services) required to support the planned growth envisaged by the Fenland Local Plan, and look forward to liaising with you further in due course.

(See attachment - Evidence Base - for Annexes)

18: Transport and Infrastructure

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

Comment Neutral

ANGLIAN WATER

Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea. Additionally, our region has the highest rate of housing in England. The initial 2021 census report identifies that population growth in the region was 8.3% in the past decade against a national average of 6.6%. Population growth in the Fenland district grew by 7.6% between 2011 and 2021 and therefore had comparatively high growth compared to the region.

ANGLIAN WATER AND THE LOCAL PLAN

Anglian Water is a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the local plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.

COMMENTARY ON THE LOCAL PLAN PREFERRED OPTIONS DOCUMENT

Evidence Base

We welcome the development of the Fenland Outline Water Cycle Study (OWCS) to inform the preparation of the Local Plan. However, we bring to the Council's attention our Draft Drainage and Wastewater Management Plan (DWMP) 2025-2050, which will replace the Water Recycling Long Term Plan, and the preparation of our Water Resources Management Plan WRMP24 that will be available for consultation in November 2022. Both documents should help to inform a more detailed iteration of the Water Cycle Study that should be utilised to support the spatial strategy for growth across the district. We agree with the OWCS recommendation for early engagement with Anglian Water to ensure that sewerage capacity can be provided without delaying the development.

The DWMP covers the period 2025-2050 and ensures that we are well prepared to meet our customer’s needs, meet environmental regulations and the maintenance of our assets. From understanding these risks, we can identify the best value solutions and promote a cocreated multi-benefit approach for sustaining reliable and affordable levels of service. The DWMP will be a tool to facilitate working in partnership to mitigate risk.

The Water Recycling Centres within Fenland District Council are within the Nene Valley CaBA (Catchment Based Approach) and the Water Care CaBA. As can be shown by Table 1 below, there are a number of Water Recycling Catchments within the district where a medium-term strategy is required by 2035 with SuDS identified as a key solution.

Table 1: Draft DWMP WRC Strategies

- Water Recycling Catchment: Benwick
Medium Term (2035): No risk identified
2050 Long-term Strategy: No risk identified
- Water Recycling Catchment: Manea - Town Lots
Medium Term (2035): Infiltration removal
2050 Long-term Strategy: No risk identified
- Water Recycling Catchment: Chatteris - Nightlayer Fen
Medium Term (2035): No risk identified
2050 Long-term Strategy: Wait and see

18: Transport and Infrastructure

Water Recycling Catchment: Doddington

Medium Term (2035): Network - mixed strategies with main solution of SuDS

2050 Long-term Strategy: 25% surface water removal from our network

Water Recycling Catchment: Whittlesey

Medium Term (2035): Network - mixed strategies with main solution SuDS

2050 Long-term Strategy: 10% surface water removal from our network

Water Recycling Catchment: March

Medium Term (2035): Network - mixed strategies with main solution SuDS

2050 Long-term Strategy: 25% surface water removal from our network

Water Recycling Catchment: West Walton (Wisbech and surrounds)

Medium Term (2035): Wait and see

2050 Long-term Strategy: 25% infiltration reduction

Water Recycling Catchment: Tipps End Green Lane

Medium Term (2035): No risk identified

2050 Long-term Strategy: Wait and see

Water Recycling Catchment: Parson Drove

Medium Term (2035): None

2050 Long-term Strategy: No risk identified

18: Transport and Infrastructure

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

Comment **Support**

The Transport Strategy Team is supportive of the Fenland Local Plan and has the following comments on the draft. Comments are also provided on some of the supplementary documents.

Paragraph 18.5 - Transport Infrastructure

Within section 18.5 of the draft Local Plan, we note that reference has been made to the emerging Local Transport and Connectivity Plan. We believe that it would be useful to include the reducing in car mileage and zero carbon targets that are detailed within. It would also be useful to highlight the link between land use planning and the major role this must play in reducing the need to travel, providing access, and supporting low carbon/public transport options- e.g., developments located with easy access to rail and enabling and encouraging active travel.

Paragraph 18.11 – Development Viability

We note in section 18.11 it mentions that if the “infrastructure ask is too high new development will be stifled” we believe that all developments should provide the infrastructure that is required to support sustainable growth. This is in line with policy 2 of the draft Fenland Transport Strategy and Policy LP19 of the draft Local Plan. If the development cannot do this, it is the people of Fenland that will suffer through developments coming forwards which are not supported by suitable infrastructure.

Paragraph 18.18 – Accessibility and Transport

Whilst there is reference to the LTCP and Fenland Cycling, Walking and Mobility Improvement Strategy 18.18 (noting version 2 was recently adopted) we would welcome reference to the draft Fenland Transport Strategy and draft Cambridgeshire’s Active Travel Strategy which will become child documents of the LTCP.

<https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/fenland-transport-strategy>

<https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy>

Following the adoption of the updated Fenland Transport Strategy it would be good if any mention of safeguarding of land for transport schemes could be included within the Local Plan. These schemes are likely to include the Wisbech Rail reconnection scheme.

Paragraph 18.35 – Wisbech Rail

The County Council is supportive of Wisbech Rail reconnection and note that the CPCA are leading on this work. We note the ambition in terms of the timescales in section 18.35 but believe that it is unlikely that work will start in 2023 and the timescales should be confirmed with the CPCA.

Paragraph 18.44 – Local Projects

At section 18.44 we see that the MTTs are referred to, we would be grateful if this could be replaced by the reference to the draft Fenland Transport Strategy. It is unclear which package has secured funding from the Greater Cambridge Greater Peterborough Growth Deal. At section 18.46 reference should be made to the draft Cambridgeshire’s Active Travel Strategy.

Transport Assessment

We understand that the Transport Assessment to support the Local Plan is currently in development and have reviewed the ‘Fenland District Council Local Plan Transport Assessment Interim Report Fenland District Council 28 July 2022’ (TA) and support the modelling approach, considering the cumulative impact of all the development sites. We note that in the next stages it states the results of the work will be published and we would be grateful if these could be shared when they are available. Within section 3.2 Public Transport Assessment it is noted that this section is likely to require an update following the Stagecoach service cuts in October 2022 and the work of the CPCA which followed.

18: Transport and Infrastructure

In Table 4.9 of the TA we note that three junctions in Wisbech proposed mitigation is stated as being covered by WATS. It should be noted that these are currently unfunded improvements, and significant further development work would be required to bring these improvements forward.

Section 4.2 of Transport Assessment Report has an Error! Reference source not found.

In table 4-2 Transport Assessment Report of the Junction Model Checklist it is noted that three models in the Wisbech area have not been obtained. We believe that these models are available and are happy to work with FDC and Atkins to make these available.

Draft Fenland Infrastructure Delivery Plan (June 2022)

As further information is developed by the TA for the Local Plan it is possible that the IDP will need to be updated to include this the last information and the latest infrastructure requirements.

2.55 - MTTS as mentioned, these are being replaced with the draft Fenland Transport Strategy and the draft Cambridgeshire's Active Travel Strategy. Please could these be referred to in this section and reference to the MTTS's removed.

18: Transport and Infrastructure

Title:		Position:	Director
First Name:	Matt	Organisation:	National Grid (Avison Young - UK)
Surname:	Verlander		

Comment **Neutral**

Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

National Grid assets within the Plan area

Following a review of the above Development Plan Document, we have identified one or more National Grid assets within the Plan area.

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places.

The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here:
<https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the

18: Transport and Infrastructure

Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here:

www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Details of National Grid assets are provided below. (see attachment for Tables of Assets)

A plan showing details and locations of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

Please also see attached information outlining further guidance on development close to National Grid assets.

Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure.

National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.

Therefore, to ensure that future Design Policies remain consistent with national policy we would request the inclusion of a policy strand such as:

"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

18: Transport and Infrastructure

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

Comment Object

Draft Fenland Infrastructure Delivery Plan (June 2022)

Insufficient recognition is given in the draft IDP to EEAST as an essential social infrastructure provider (& emergency service) impacted by the planned housing & population growth proposed in the local plan, necessitating developer funding to mitigate the increased draw down on ambulance service operational capacity & related facilities.

Change Requested

Update and supplement the text at page 70 'Ambulance Services' - Paragraph 2.298 can be retained with the acronym (EEAST) added in brackets after East of England Ambulance Service NHS Trust. Subsequent paragraphs to incorporate the text outlined below;

EEAST is an essential social infrastructure provider (and emergency service), who confirm there will be an increased requirement for ambulance facilities necessitated by the planned housing and population growth arising within Fenland District.

The National Planning Policy Framework requires the planning system to provide for sustainable development through local authority plan making and development management processes, which should aim to achieve healthy, inclusive and safe places.

In promoting healthy lifestyles the planning system should provide the social facilities and services the community needs. It should take into account and support the delivery of local strategies to improve health and social wellbeing for all sections of the community, and ensure an integrated approach to considering the location of housing and community facilities and services.

As an essential social infrastructure provider EEAST has an important role to play in contributing to the achievement of sustainable new places (and along with its health and blue light partners) creating the conditions for healthy, safe and cohesive communities.

Population Increase & Demographic Profile

Population increase, along with deprivation, age and the increasing number of people living for longer with more complex long-term conditions, all impact on the level of ambulance service demand, in respect of both emergency and non-emergency patient transport services.

The age profile is also a key factor, as people at both ends of the age spectrum consume a disproportionately large quantity of healthcare services and resource. Those aged over 75 years are most likely to have multiple long-term conditions and complex care needs.

Analysis of EEAST activity from 2019/20 indicates residents aged 65 years and over account for over 1/3 (35%) of Category 1 ambulance activity and 52% of all activity. Those aged 2-18 years account for 15% of Category 1 activity and 8% of all activity.

EEAST will therefore require developer funding to mitigate the impacts arising on its service capacity - from the population increase associated with the planned growth in the Fenland area.

Planned Housing & Population Growth - Ambulance Facilities Funding Requirement & Budget

Calculations to identify the likely cost of ambulance facilities provision based on the growth levels in Fenland over the Plan Period 2021-2040 are set out below.

EEAST has 'discounted' all housing sites within Fenland which are identified as 'Committed Large Sites' and 'Additional

18: Transport and Infrastructure

Net Commitments' in Table 9 of the draft Plan.

Adopting this approach and an average household size within Fenland of 2.3 (ONS 2011 Census) EEAST considers that developer funding for an appropriate level of ambulance facilities is required in relation to the site allocations comprising 5,098 dwellings (11,725 population).

This planned growth is distributed across Fenland's hierarchy of growth locations, with major growth principally directed to the Market Towns, Large and Medium Villages, and would impact on EEAST's operations within the geographical area, which are operating at capacity.

Development at each major housing growth location (above) would therefore lead to an increased draw on ambulance service capacity and resources across the Fenland area.

Based on the total (discounted) levels of housing/population growth to be planned for within the Fenland area of 5,098 dwellings and 11,725 population (employing an average household size of 2.3) the following budget for ambulance facilities and funding arises:

- £1,529,400 – within the Fenland area based on a standard charge of £300 per dwelling.

In the absence of CIL, a 'standard charge' of £300 per dwelling is considered necessary to fund the increased operational capacity EEAST is likely to require through additional ambulance service provision.

EEAST does acknowledge that the draft Local Plan and related housing sites have been the subject of viability testing and would be content to be flexible in its approach to securing funding for ambulance facilities.

Each planning application would therefore be assessed on its merits to determine the likely funding required, which if applicable, would be secured via agreement with the developer(s) through a planning obligation.

The range of infrastructure and facilities (comprising staff, vehicle fleet & estate assets) likely to be required to mitigate the impacts arising and enable EEAST to maintain nationally mandated contractual response times and treatment outcomes, is summarised below:

- An increase in the number & type of ambulances;
- Provision of additional medical, pharmacy & IT equipment/digital software to manage the increased number of incidents arising from the new population;
- The recruitment, training, equipping & tasking of Community Responders based within the locality of development sites & their environs;
- Redevelopment or relocation of existing ambulance stations to a more suitable location to meet the increased local demand arising from housing developments.

EEAST KEY OPERATIONAL FACTS & SERVICE INFORMATION

This section summarises EEAST's service remit, priorities, staff, vehicle fleet & estate assets, & co-working relationship with other healthcare & blue light partners & service targets.

Service Remit & Priorities

The East of England Ambulance Service NHS Trust provide accident and emergency services and non-emergency patient transport services across the East of England.

The Trust Headquarters is in Melbourn, Cambridgeshire and there are Ambulance Operations Centres (AOC) at each of the three locality offices in Bedford, Chelmsford and Norwich who receive over 1 million emergency calls from across the region each year, as well as 800,000+ calls for patients booking non-emergency transport.

The 999 service is part of the wider NHS system providing integrated patient care. Provision of 999 services is aligned closely with national and regional initiatives driven by:

- Sustainability and Transformational Partnerships
- Integrated Care System
- Integrated Urgent Care systems, ie NHS 111, Clinical Assessment Services, Urgent Treatment Centres, GP Out of

18: Transport and Infrastructure

Hours Services.

Additionally, regional Ambulance Trusts may collaborate closely with other ambulance services, the wider emergency services or wider system providers to deliver appropriate patient care.

To support the service transformation agenda, the key requirements are:

- To deliver the core response and clinical outcome standards as defined by the Ambulance Response Programme
- To fulfil statutory duties relating to emergency preparedness, resilience and response (EPRR)
- Optimisation of call handling and appropriate responses through virtual alignment of NHS 111/999 and call/CAD transfer between ambulance services
- Increase the percentage of lower acuity calls managed through “hear and treat” and “see and treat” options
- Utilise a virtual delivery model to support wider workforce integration for paramedics, call handlers and specialist staff with local urgent care delivery models
- Facilitate cross boundary working and the flexible use of ambulance service resources to support the development of regional Sustainability and Transformational Plans and Integrated Care Systems.

The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients:

- Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2
- Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions
- Patients may be passed to 999 via other NHS health care systems, including NHS 111
- EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.

EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.

Non-Emergency Patient Transport Services (NEPTS) provide an essential lifeline for people unable to use public or other transport due to their medical condition. These much-needed journeys support patients who are:

- Attending hospital outpatient clinics or other healthcare location
- Being admitted to or discharged from hospital wards
- Needing life-saving treatments such as radiotherapy, chemotherapy, renal dialysis or DVT treatment.

Service Assets

EEAST clinicians:

- Emergency Care Support Workers
- Emergency Medical Technicians
- Paramedics
- Specialist Paramedics
- Critical Care Paramedics.

Types and models of response:

- Community First Responder (CFR)
- Patient Transport Service (PTS)
- Clinical See and Treat
- Clinical Hear and Treat (telephone triage)
- Early Intervention Team (EIT)
- Rapid Response Vehicle (RRV)
- Double Staff Ambulance (DSA)
- Hazardous Area Response Team (HART)
- Specialist Operations Response Team (SORT)
- Helicopter Emergency Medical Service (HEMS), EEAST utilise 5 aircraft across 3 charities within the region:
 - o Magpas – 1 x aircraft from RAF Wyton
 - o East Anglian Air Ambulance – 2 x aircraft form Cambridge and Norwich Airport
 - o Essex and Herts Air Ambulance – 2 x aircraft form North Weald and Earls Colne

18: Transport and Infrastructure

Ambulance Operations Centre (AOC) staff:

- 999 Call Handlers
- Emergency Medical Dispatchers
- Tactical Operations Staff.

EEAST support services staff cover all other corporate and administrative functions across the region.

Estates

The Trust is rolling out a Hub and Spoke network with up to 18 Hubs to provide regional premises for delivery of operational responses to calls, flow of ambulance preparation via the Make Ready function (cleaning and restocking of ambulances) and despatch of ambulances to local spokes (response posts/reporting base/standby locations). Support services such as workshop facilities, clinical engineering (medical equipment store and workshop), consumable product stores and support office accommodation are also provided from Hubs.

- Ambulance Station Central Reporting Post - A 24/7 - Permanent reporting base for staff and primary response location for one or more vehicles. Provision of staff facilities.
- Ambulance Station Response Post - A primary response location, which includes staff facilities but is not a reporting base for staff.
- Standby Location - Strategic locations where crews are placed to reach patients quickly. Facilities used by staff are provided on an informal basis only by agreement with the relevant landowner.

Current Ambulance Stations in the Fenland Council area:

March

Wisbech

Chatteris (Response Post with fire station)

Current Ambulance Stations which surround the Fenland Council area and from which ambulances may also support people in the Fenland Council area:

Peterborough: Hub (in future will serve Fenland area), Response Posts x 4

Huntingdon: (in future will become a Hub)

Kings Lynn: (in future will become a Hub)

St Ives

Ely

Whittlesey: (Response Post)

Downham Market

Vehicle Fleet

- 387 front line ambulances
- 178 rapid response vehicles
- 175 non-emergency ambulances (PTS and HCRTs vehicles)
- 46 HART/major incident/resilience vehicles located at 2 x Hazardous Area Response Team (HART) bases with a number of specialist vehicle resources.

Workforce & Equipment

Approximately 4,000 staff and 800+ volunteers across 120 sites. Each resource has equipment specific to the operational function of the vehicle and skill level of the staff.

Specialisms

EEAST works collaboratively across our blue light partners and have joint working groups with Police and Fire Services across the region, working in partnership managing responses to incidents and undertaking joint exercises with our dedicated resources to prepare for specialist rescue, major incidents and mass casualty incidents.

EEAST is a Category 1 Responder under the Civil Contingencies Act, 2004, playing a key role in developing multi-agency plans against the county and national risk registers. EEAST also works closely with the Military, US Air Force, Royal

18: Transport and Infrastructure

Protection Service, Stansted Airport and the Port of Felixstowe Police, Fire and Ambulance services.

EEAST's Emergency Preparedness Resilience Response (EPRR) team lead on the Joint Emergency Services Interoperability Principles (JESIP) working in close partnership with all blue light agencies, the Coastguard and Local Authorities. Specialist resources work with the Police in counter terrorism and developing response plans in the event of a major incident.

EEAST are an integral part of the locality's resilience response sitting on a number of safety advisory groups, east coast flood working groups and hospital emergency planning groups.

Co-working Relationship with other Blue-Light & Healthcare Partners

EEAST is an integral part of the wider healthcare system working closely with the Cambridge and Peterborough Integrated Care System (ICS) to deliver emergency and urgent care and are key stakeholders in supporting wider healthcare initiatives.

Within the Fenland area EEAST work with the ICS in delivering additional care pathways focusing on hospital admission avoidance, this is a partnership with the local acute providers and local authorities. EEAST operate Early Intervention Response vehicles and Rapid Intervention Vehicles. These resources work collaboratively within the system to offer holistic care to patients whilst reducing pressure on Emergency Departments.

This is EEAST's response to the requirements of the NHS Long Term Plan, with the clear narrative that in order to bring the NHS into financial balance all NHS providers must find mechanisms to treat patients in the community and out of the most expensive care setting, which are acute hospitals. This not only saves the NHS critical funding, but it also improves patient outcomes.

EPRR and Specialist Operations teams routinely train with other blue light agencies in preparedness for major incidents such as terrorist attacks and major incidents with statutory training obligations to respond to local and national incidents.

In continuing to respond to the COVID-19 Pandemic, EEAST is working collaboratively with Private Ambulance providers, the Military, volunteer Ambulance Services (such as St John Ambulance and British Red Cross) and local Fire and Rescue Services, to increase its capacity and maintain service delivery to meet the additional demand.

EEAST Service Targets

All NHS organisations are required to report against a set of Core Quality Indicators (CQIs) relevant to their type of organisation. For ambulance trusts, both performance and clinical indicators are set as well as indicators relating to patient safety and experience.

NHS organisations are also required to demonstrate their performance against these indicators to both their commissioners and Regulators (NHS England/Improvement).

It is important to note that EEAST is also measured on how quickly a patient is transported to an appropriate location for definitive care, often in time critical circumstances.

Failure to deliver against these indicators will result in a Contract Performance Notice and could result in payment being withheld, as prescribed in NHS Standard Contract 20/21 General Conditions (Full Length) GC9 9.15.

(See attachments - Rep 7 - for EEAST Operational Standards & Thresholds Ambulance Service Response Times)

18: Transport and Infrastructure

Title:		Position:	Head of Business Relationships
First Name:	Zoe	Organisation:	East of England Ambulance Service NHS
Surname:	May		
Comment	Object		
Section 18 Transport & Infrastructure, Community Infrastructure paragraph 18.8			
Insufficient recognition is given to EEAST as an essential social infrastructure provider impacted by planned housing & population growth.			
Change Requested			
In para 18.8, line 1 after 'health' add "ambulance"			
Line 1 to read . . . New development will also increase demand for other forms of infrastructure such as schools, health and ambulance services, sports and leisure facilities . . .			
<hr/>			

18: Transport and Infrastructure

Title:

Position:

First Name: Lynda

Organisation:

Surname: Warth

Comment **Object**

'18.11 Developer contributions, secured through planning obligations in section 106 agreements, will continue to make an important contribution to the provision of new infrastructure to meet needs arising from growth. However, in negotiating such planning obligations the Council and service providers must be mindful of the area's low development viability. If the infrastructure 'ask' is too high, new development will be stifled.'

Flawed by the process – no stakeholder engagement as to what should be required in the S.106 provision and lack of knowledge by Planners of the difference between walking and cycling and active travel provision. Please note the comment above concerning S106.

'18.18 The Council adopted the 'Fenland Cycling, Walking and Mobility Improvement Strategy (Version 1)' in September 2021 and is currently preparing Version 2 of the document. The aim of this strategy is to develop a core network of routes that can be improved in the short and medium term and built upon in the future. To achieve this, key walking and cycling routes linking densely populated residential areas with safe, direct walking/cycling routes to places of education and employment will be identified, along with routes to rail or bus stations for longer distance multimodal journeys.'

To comply with the CPCA LTP this needs to be Active Travel provision to include equestrians to support the Fenland equestrian industry and to meet the requirements of the Cambs ROWIP, the changes to the Highway Code, the Road User Hierarchy, the advice by the BHS Director of Safety.

'Wisbech Rail

18.34 Construction of a new rail link to Wisbech has the potential to transform accessibility for the town, enabling residents and businesses in Wisbech to reach Cambridge in approximately 45 minutes. Re-opening of the Wisbech rail connection would connect residents to opportunities within Greater Cambridge, including skilled roles in the knowledge economy, and education and training opportunities at The University of Cambridge, Anglia Ruskin University and Cambridge Regional College.

18.35 The Full Business Case for Wisbech Rail was completed in December 2020. Work on the rail link is likely to begin in 2023 and be functionally completed in 2026, with direct services to Cambridge possible by 2028.'

Must include NMU path for all user groups including carriage drivers. Only narrow wheeled cyclists need hardtop, everyone else needs soft surfaces. This feeds into the active travel strategy, rural jobs, diversification for farmers, tourism, health and well being. Public money must be spent to benefit the maximum number of users.

'Local Projects

18.44 The LTP is accompanied by a Market Town Transport Strategy (MTTS) for each of Fenland's towns. The MTTSs include local projects to address transport issues in each town and are intended to complement strategic projects. For example, plans to re-open the March to Wisbech rail line will be complemented by bus, walk and cycle, and road improvements. Funding has been secured from the Greater Cambridge Greater Peterborough Growth Deal to deliver this package.'

Needs to be multi user routes for all reasons above.

'18.51 There is a network of public rights of way (PRoW) within Fenland and three nationally recognised long-distance walking trails: the Hereward Way, Nene Way and Meridean Way traverse the district and meet near March. National Cycle Route 63 links Wisbech, March and Whittlesey with Peterborough and Leicester to the west.'

No long distance provision for equestrians.

LP19: Strategic Infrastructure

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

Comment Object

Paragraph 1 of this policy sets out that ‘All new development should be supported by, and have good access to, all necessary infrastructure. Planning permission will only be granted if it can be demonstrated that there is, or will be sufficient infrastructure capacity to support and meet all the necessary requirements arising for the proposed development. Development proposals must consider all of the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.’ Given that a Viability Report supports the Local Plan Review, Persimmon Homes are of the view that the wording of this policy should refer to the infrastructure ‘where viable.’

As part of the review of the Local Plan the Council need to update and consult upon an updated Infrastructure Delivery Plan (IDP). This policy specifically states that decisions on securing conditions and obligations towards strategic infrastructure will reflect the ‘prioritisation’ categorises set out in the IDP, however the current IDP dates back to and is significantly out of date, dating back to 2016.

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

Comment Support

Policies LP19: Strategic Infrastructure, LP20: Accessibility and Transport and LP21: Public Rights of Way

We welcome the proposal to update the adopted ‘Fenland Cycling, Walking and Mobility Improvement Strategy’ to develop a core network of routes that can be improved in the short and medium term and built upon in the future. We’re also aware that the Fenland Local Transport Plan is being developed with a focus on Improving accessibility to Fenland by both road and public transport. We support policy requirements to improve walking and cycling links and Public Rights of Way.

Natural England’s advice is that the Local Plan should include strong policies to promote sustainable travel including requirements to protect and enhance the cycle and footpath network and facilities. Reducing people’s reliance on car travel can provide significant air quality, climate change and health benefits.

We welcome the requirements for schemes generating major traffic to undertake an Air Quality Assessment. This should be informed by a traffic modelling to inform a detailed assessment of the effects of nitrogen and other emissions and depositions where sensitive ecological receptors, particularly designated sites, are located within 200m of the affected road network.

LP19: Strategic Infrastructure

Title: Councillor **Position:**

First Name: Ruth **Organisation:** Doddington Neighbourhood Plan Group

Surname: Hopkins

Comment **Object**

The Doddington Neighbourhood Plan Group feels that for too long the District Council has accepted viability arguments from developers which has led to the delivery of infrastructure (particularly affordable housing) being compromised. Often this is achieved through amending Section 106 Agreements after they have been agreed. The Group considers that developers should be accountable and deliver schemes which have been granted planning permission.

Where developers make such viability arguments for allocated sites within the new Local Plan the Group feels that the community should be able to consider whether such proposals should not be granted planning permission as the benefits of delivering a development without affordable housing may not be acceptable.

Developers will be aware of viability considerations when putting land forward for allocation within this Local Plan.

Title: **Position:**

First Name: **Organisation:** Barratt and David Wilson Homes Cambri

Surname:

Comment **Support**

This policy wording is supported and in accordance with national policy it is important that due consideration is given to viability of development.

Title: **Position:**

First Name: Susie **Organisation:** St John’s College Cambridge

Surname: Wood

Comment **Support**

Support for the principle that all new development should be supported by, and have good access to, all necessary infrastructure, but also the recognition in the policy that, in negotiating such conditions and obligations, the Council will be mindful of viability constraints.

LP19: Strategic Infrastructure

Title:		Position:	Spatial Planning Advisor
First Name:	Tess	Organisation:	Anglian Water Services Limited
Surname:	Saunders		
Comment	Neutral		
Anglian Water supports the policy approach regarding the delivery of infrastructure, and that such development (including water supply) will be supported in principle, especially where it is needed to support growth, quality of life or economic prosperity in the district. Most notably the Strategic Pipeline Alliance to enable strategic water supply transfers between water resource zones, is underway including the Grantham to Bexwell section that extends through Fenland District, and the proposed Fens Reservoir will be a nationally significant infrastructure project that will provide more resilient water storage to make sure we have enough water in the future to meet demands, and to protect and restore the environment.			

Title:		Position:	Transport & Environment Manager
First Name:	Lewis	Organisation:	Peterborough City Council
Surname:	Banks		
Comment	Neutral		
Thank you for consulting Peterborough City Council on your draft Local Plan. We were appreciative of the meeting that was organised on 13 October to go through a number of aspects in greater detail.			
As discussed at the meeting, there are a number of transport considerations that could have implications for Peterborough and we believe further analysis is needed to understand these potential impacts. The A605 is a key strategic route and increasing traffic along this route could cause issues at certain junctions. We would welcome further work on this potential issue, in particular in the Peterborough unitary area. We would recommend that a sensitivity test is undertaken with North Bank shut, as that road floods every year which results in more traffic using the A605 and the surrounding network.			
Another concern for many of our residents is HGVs in residential area. We would not want to see an increase in HGVs using inappropriate local roads that can negatively affect some of our communities. Measures to prevent this issue need to be considered.			
Improving sustainable transport is key and Peterborough City Council is currently developing its Local Cycling and Walking Infrastructure Plan and its rural cycle strategy. There could be some excellent opportunities to work in partnership to enhance some cross border connections and we would welcome further dialogue on this to see what opportunities there could be.			
Thank you for consulting us and we would like to be kept informed on the progress of the Local Plan as well as the points that we have raised in this letter.			

LP19: Strategic Infrastructure

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

Whilst the section on developer contributions mentions that “the Council will be mindful of viability constraints” it does not proposes a mechanism for such consideration. This should reflect the wording of the 2014 Fenland Local Plan Policy LP5 Part A that a recognized Viability Assessment model should be submitted in support of negotiations by a developer.

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

The County Council is concerned that future funding secured through planning obligations is unlikely to be sufficient to fund the delivery of the additional school places necessary to meet the demands from new housing development. The District Council’s approach outlined in the Local Plan Viability Assessment allows for a disproportionate amount of surplus development value to go towards affordable housing with insufficient allocated for essential infrastructure, currently £2,000 per dwelling. It is therefore necessary to strike a more equitably balance when apportioning development surplus between funding through S106 agreements and affordable housing.

The County Council’s own financial position, in keeping with many local authorities, means that it is seeking to restrict its borrowing and fund the creation of additional school places through developer contributions or capital grant. If there is a shortfall in developer contributions the Council may have to consider other solutions such as temporary accommodation and transporting children to alternative schools, an unpopular and costly measure in a rural district.

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

The draft Local Plan does not include a specific policy or reference to Digital Infrastructure. “Supporting high quality communications” forms section 10 of the National Planning Policy Framework (NPPF) which states: “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments.”

Connecting Cambridgeshire considers that unless Digital Connectivity is covered in the Local Plan or a Supplementary Planning Document it will be difficult to enforce any requirement for high quality communications in new developments. As a society we have become increasingly reliant on digital connectivity and as such having digital infrastructure included within planning policy is an important step in ensuring that residents and businesses have access to this important infrastructure.

LP19: Strategic Infrastructure

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

Comment **Object**

The Future Fens Flood Risk Management Baseline Report (December 2020) indicates that there is some uncertainty regarding the availability of government funding for continued maintenance of the flood risk management infrastructure in the Fens over the next 100 years.

We strongly recommend that this policy includes a requirement for any new major development in flood risk areas that benefit from flood defences to provide financial contributions to existing flood risk management infrastructure to ensure the development is sustainable and flood risk benefits are provided to existing communities.

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

Comment **Support**

National Highways are supportive of the plans objective that all new development should be supported by, and have good access to, all necessary infrastructure. National Highways will continue to review applications in respect to the Strategic Road Network as and when they come forwards. We will continue to work with Fenland Council to assess any new development has sufficient infrastructure capacity to support and meet all the necessary requirements arising.

East / West Corridor

The A47 is both a nationally and internationally strategic link, it is a key route into East Anglia, connecting Norwich and Norfolk with the East Midlands and the A1, and carries a large amount of heavy goods traffic.

National Highways are generally supportive of the emerging Local Plan and wish to continue to collaborate and communicate as the plan develops.

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

Comment **Neutral**

Other Points

Viability – The Queensbridge Homes development in Wisbech St Mary has shown how badly this can affect an area, developments of a certain size must be conditioned to pay into the area for play, infrastructure, schools and health regardless of whether the developer makes over 10% profit. If the development is determined as unviable then the development should not be given permission to be built unless the development can offer a fair degree of affordable housing.

Infrastructure – No mention as to how infrastructure will develop along with housing growth within rural areas. Connectivity between rural areas and towns is a must to alleviate rural isolation.

LP19: Strategic Infrastructure

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

LP 19 is inadequate as it does not adequately address how infrastructure will be delivered in the rural areas. Often the development occurs without providing adequate infrastructure benefits.

LP20: Accessibility and Transport

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

Comment **Support**

Policies LP19: Strategic Infrastructure, LP20: Accessibility and Transport and LP21: Public Rights of Way

We welcome the proposal to update the adopted 'Fenland Cycling, Walking and Mobility Improvement Strategy' to develop a core network of routes that can be improved in the short and medium term and built upon in the future. We're also aware that the Fenland Local Transport Plan is being developed with a focus on Improving accessibility to Fenland by both road and public transport. We support policy requirements to improve walking and cycling links and Public Rights of Way.

Natural England's advice is that the Local Plan should include strong policies to promote sustainable travel including requirements to protect and enhance the cycle and footpath network and facilities. Reducing people's reliance on car travel can provide significant air quality, climate change and health benefits.

We welcome the requirements for schemes generating major traffic to undertake an Air Quality Assessment. This should be informed by a traffic modelling to inform a detailed assessment of the effects of nitrogen and other emissions and depositions where sensitive ecological receptors, particularly designated sites, are located within 200m of the affected road network.

LP20: Accessibility and Transport

Title:		Position:	
First Name:	Victoria	Organisation:	Barton Willmore
Surname:	Yeandle		
Comment	Neutral		
Metalcraft acknowledges the Policy.			

These representations are accompanied by a technical Transport Report, which concludes that the proposed allocation is acceptable on highway grounds (safety and impact on existing highway network).

The Indicative Masterplan provides for up to four accesses to the Site, which will come forward when required to support the delivery of the scheme. The principal accesses are from the A141 to the south and across the drain from the existing Metalcraft site. This latter access is also currently subject to upgrade as the A141/Huntingdon Road roundabout is being improved as part of the implementation of the approved Training Centre.

The Technical Report also provides high level analysis on the acceptability of direct access from the A141. The note concludes that there are no highways reasons (impacts on the network and safety) as to why direct access from the A141 is not acceptable.

Metalcraft acknowledges that any future planning application would be accompanied by a Transport Assessment which would thoroughly assess the amount of traffic generated by the proposals and well as provide further details on the proposed accesses to the scheme. However, initial analysis from the Transport Report confirms that the traffic generated by the Site would be distributed so that any impact would not adversely impact the highway network, in accordance with NPPF criteria.

The NCTC scheme has already improved the pedestrian and cycle access to the centre of the town and other sustainable modes. As part of the roundabout improvements, the Centre has also provided a pedestrian/cycle link from the existing bus stop along Huntingdon Road and across the A141. The wider scheme will explore opportunities for further initiatives to improve pedestrian/cycle links and access to the town settlement and other modes of sustainable transport.

The Vision Document also puts forward ancillary services and facilities, such as a pub and hotel, within the allocation. This should serve to increase internalised trips and reduce the impacts on the road network.

LP20: Accessibility and Transport

Title:		Position:	Transport & Environment Manager
First Name:	Lewis	Organisation:	Peterborough City Council
Surname:	Banks		

Comment **Neutral**

Thank you for consulting Peterborough City Council on your draft Local Plan. We were appreciative of the meeting that was organised on 13 October to go through a number of aspects in greater detail.

As discussed at the meeting, there are a number of transport considerations that could have implications for Peterborough and we believe further analysis is needed to understand these potential impacts. The A605 is a key strategic route and increasing traffic along this route could cause issues at certain junctions. We would welcome further work on this potential issue, in particular in the Peterborough unitary area. We would recommend that a sensitivity test is undertaken with North Bank shut, as that road floods every year which results in more traffic using the A605 and the surrounding network.

Another concern for many of our residents is HGVs in residential area. We would not want to see an increase in HGVs using inappropriate local roads that can negatively affect some of our communities. Measures to prevent this issue need to be considered.

Improving sustainable transport is key and Peterborough City Council is currently developing its Local Cycling and Walking Infrastructure Plan and its rural cycle strategy. There could be some excellent opportunities to work in partnership to enhance some cross border connections and we would welcome further dialogue on this to see what opportunities there could be.

Thank you for consulting us and we would like to be kept informed on the progress of the Local Plan as well as the points that we have raised in this letter.

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

Comment **Neutral**

It is recommended that bullet point A is expanded to ensure that development layouts can accommodate public and emergency services, such as waste collection, fire and rescue and public transport vehicles.

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

Comment **Object**

Absolutely must be policy to provide multi user access. Discriminatory to do otherwise. See all the previous comments above.

LP20: Accessibility and Transport

Title:

Position:

First Name: Lynda

Organisation:

Surname: Warth

Comment **Object**

'Policy LP20: Accessibility and Transport

New development must ensure that appropriate provision is made for the transport needs that it will create.

Proposals for new development or enhanced transport schemes should demonstrate that appropriate, proportionate and viable opportunities have been taken to:

a) Ensure that all users have safe, convenient access to the existing highway network;

b) Ensure that the design and layout provides suitable pedestrian and cycle routes that are safe, desirable and well connected to the existing network;

c) Promote road safety and contribute to a reduction in road accidents, particularly in rural areas, by ensuring transport infrastructure is safe and accessible to all;

d) Ensuring that development is accessible, being well located in relation to existing or proposed services and facilities;

e) Seek to improve walking and cycling links into and within market towns and other settlements and improve links between settlements.'

Absolutely must be policy to provide multi user access. Discriminatory to do otherwise. See all the previous comments above.

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: Steve

Organisation:

Surname: Cornell

Comment **Neutral**

The documents refer to encouraging cycling and creating safe areas for pedestrians and cyclists. The proposals for March Town Centre Regeneration do not include a cycle lane in March town centre (High Street / Broad Street). This will inevitably result in cyclists using the pedestrian area making both unsafe. Is there any joined up thinking? Parking restrictions will be vital in ensuring safe passage through town - there has been no parking enforcement for many years and there appears to be no funding in the near future either.

LP20: Accessibility and Transport

Title:

Position:

First Name: MaryAnn

Organisation: ICS North Place Partnership

Surname: Watson

Comment **Neutral**

Bus services are being cut across Fenland, how will you ensure patients have access to healthcare services and that with new developments you are not increasing the health inequalities across Fenland that already exist. See link below:

<https://www.cambridge-news.co.uk/news/local-news/stagecoach-bus-timetables-18-bus-25062860>

Title: Mr

Position: Planning Manager

First Name: Philip

Organisation: Sport England

Surname: Raiswell

Comment **Neutral**

This policy must encourage that design and layout encourages pedestrian and cycle routes that are safe and connected to existing networks.

Title:

Position:

First Name: Richard

Organisation: Benwick Parish Council

Surname: Robinson

Comment **Neutral**

No mention is made about the terrible state of the road surfaces, which is very noticeable and can damage vehicles and could cause accidents. 18 months ago the road from Ramsey to Benwick was improved but it is now in a very bad condition.

Dial a ride should be publicised so people are aware of it

Title:

Position:

First Name: Andrew

Organisation:

Surname: Hammond

Comment **Neutral**

March formed a neighbourhood Plan after a consultation period in 2017. As part of the consultation, I provided comments which included the forming of walking/Cycle routes through and around the town of March. This suggested linking existing routes to other fringe areas around March effectively encircling March and the interconnecting routes through forming the spokes. (I even drew it out on the plan they provided.) It was based on minimising contact between pedestrians/cyclists and vehicular traffic. If we want people to be fitter, safer and in a greener society then this is the sort of policy that should be formulated in a plan that takes us through to 2040 otherwise we will not be any further forward even then.

LP20: Accessibility and Transport

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

Title:

Position:

First Name: Valerie

Organisation:

Surname: Lavender

Comment **Support**

Transport and Connectivity within the Fens is poor. Services do not run regularly enough or late enough. This prevents individuals from being able to access facilities to support their Health and Wellbeing.

Road safety should include provision for powered two-wheelers. Moped, motorcycle and scooter use is a viable alternative to many over private car use with ownership and running costs. If you would like more details or assistance feel free to contact the Motorcycle Action Group www.mag-uk.org

LP21: Public Rights of Way

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

Comment Object

Some wording should be included to allow for PROW to be diverted to integrate within a development, as long as it is not being removed.

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

Comment Support

Policies LP19: Strategic Infrastructure, LP20: Accessibility and Transport and LP21: Public Rights of Way

We welcome the proposal to update the adopted 'Fenland Cycling, Walking and Mobility Improvement Strategy' to develop a core network of routes that can be improved in the short and medium term and built upon in the future. We're also aware that the Fenland Local Transport Plan is being developed with a focus on Improving accessibility to Fenland by both road and public transport. We support policy requirements to improve walking and cycling links and Public Rights of Way.

Natural England's advice is that the Local Plan should include strong policies to promote sustainable travel including requirements to protect and enhance the cycle and footpath network and facilities. Reducing people's reliance on car travel can provide significant air quality, climate change and health benefits.

We welcome the requirements for schemes generating major traffic to undertake an Air Quality Assessment. This should be informed by a traffic modelling to inform a detailed assessment of the effects of nitrogen and other emissions and depositions where sensitive ecological receptors, particularly designated sites, are located within 200m of the affected road network.

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

Comment Support

LP21 Public Rights of Way, p.79

RSPB supports this policy wording to encourage enhancement of the public rights of way network in Fenland, where this is appropriate. Justification – access to greenspace and nature has been well documented as important in improving physical and mental health. The limited network in Fenland should be improved, particularly adjacent to settlements.

LP21: Public Rights of Way

Title:

Position:

First Name: Lynda

Organisation:

Surname: Warth

Comment

Object

This policy must be linked to every other policy which goes before it. The network cannot be protected 'in principle' (definition: used to indicate that although something is theoretically possible, in reality it may not actually happen) – it must be protected without question. Fenland should also undertake to protect rural bridleways / restricted byways / byways which are grass covered as part of Fenland heritage and not urbanise them through roadification by tarmac or other hard top for cyclists. All cyclists can already use these routes and many enjoy doing so. It is only narrow tyre cycles intended for tarmac use which cannot use them comfortably. All the other rightful users (walkers, dog walkers, runners, off road cyclists, horse riders, carriage drivers) are soft surface users and their rights and amenity must be protected.

The omission of carriage drivers from this statement is to be deplored and shows a lack of knowledge of rights of way users by the authors.

No long distance provision for equestrians.

Title:

Position:

First Name: Lynda

Organisation:

Surname: Warth

Comment

Object

'Policy LP21: Public Rights of Way

The existing public rights of way network will, in principle, be protected from development. New development that will result in the loss or cause demonstrable harm to any public right of way will not be supported. The Council will work with Cambridgeshire County Council, developers, landowners and other key stakeholders to enhance the network including for new cycle and horse-riding routes and permissive pathways and positively support such proposals through the development management process where there is no unacceptably adverse impact on amenity, safety, ecology or heritage assets.'

This policy must be linked to every other policy which goes before it. The network cannot be protected 'in principle' (definition: used to indicate that although something is theoretically possible, in reality it may not actually happen) – it must be protected without question. Fenland should also undertake to protect rural bridleways / restricted byways / byways which are grass covered as part of Fenland heritage and not urbanise them through roadification by tarmac or other hard top for cyclists. All cyclists can already use these routes and many enjoy doing so. It is only narrow tyre cycles intended for tarmac use which cannot use them comfortably. All the other rightful users (walkers, dog walkers, runners, off road cyclists, horse riders, carriage drivers) are soft surface users and their rights and amenity must be protected.

The omission of carriage drivers from this statement is to be deplored and shows a lack of knowledge of rights of way users by the authors.

LP21: Public Rights of Way

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:	Patricia	Organisation:	
Surname:	Brooks		
Comment	Support		
The Council aims to work with landowners and other stakeholders to enhance permissive pathways, offering the potential to allow continued public access to Wenny Meadow.			

Title:	Mr	Position:	Planning Manager
First Name:	Philip	Organisation:	Sport England
Surname:	Raiswell		
Comment	Support		
Sport England supports the protection of existing public rights of way.			

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			

LP22: Parking Provision

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

Comment Object

Part A LP22

Part A of policy LP22 sets out that for residential developments the number of parking spaces should be informed by site context and location, however Appendix 6 sets out minimum car parking standards for residential units. On this basis, the policy implies that further car parking provision may be sought in addition to these minimum standards. Persimmon Homes are of the view that the standards set out in Appendix 6, subject to the comments below, are more than adequate for future residential development, and in fact in some locations, for example sites within or close to town centres, this number could be relaxed. Increasing the number of spaces beyond these minimum standards, which are already high, will have implications for viability, housing numbers and will result in an unduly car parking dominated development, these matters are discussed in more detail below.

This policy also states that single garages will not be counted as a car parking space and double garages will only be counted as one car parking space. The key to garages being used for parking purposes is their size and ensuring they are large enough to easily accommodate a car and the necessary moving space around. Persimmon Homes are of the view that a garage with an internal dimension of 7 metres by 3 metres should be counted as one parking space provided that additional cycle storage space is provided elsewhere within the plot.

Persimmon Homes are of the view that Part A of policy should be re-worded to state:-
- residential car parking to be in accordance with the minimum standards set out at Appendix 6

Appendix 6 Parking Standards

This policy also introduces visitor parking at a rate of 0.25 spaces per dwelling. The current Fenland Local Plan does not set a mandatory requirement for visitor parking spaces. The policy also increases car parking requirements for three and four dwellings from 2 spaces per dwelling to 2.2 and 3 spaces to 3.2 to respectively. No evidence base has been submitted to justify this increase in provision, for example the Atkins Transport Assessment Interim Report makes no reference to car parking.

Extra parking spaces will inevitably result in a car parking dominant layout, to the detriment of the character of the area. It also needs to be borne in mind the design implications of this policy, with the need to provide a greater number of car parking spaces resulting in a car dominated layout, to the detriment of the street scene and overall character of the area.

In terms of car parking spaces per dwelling - no evidence has been put forward to demonstrate that the council's existing car parking standards are not working. Persimmon Homes are of the view that these existing standards should be replicated in the new local plan.

Persimmon Homes recognise that it is beneficial for residential developments to provide a level of car parking to visitors, however consider the level of visitor parking proposed is both excessive and unjustified. No evidence has been submitted with the plan to justify one space for every four dwellings. The Atkins Transport Assessment Interim Report makes no reference to visitor parking provision. The standards also do not differentiate between different size houses.

Notwithstanding this, Persimmon Homes would suggest that the visitor parking spaces be amended to reflect those set out in the Peterborough Local Plan which was adopted in 2019 which do take into account the sizes of houses in the level of need for visitor spaces would subject to justification, be more proportionate:-

- 1 bed unit = 1 visitor space for every 4 dwellings
 - 2 and 3 bed units = 1 space for every 6 dwellings
 - 4 plus bed units = 1 space for every 4 dwellings
-

LP22: Parking Provision

Title: **Position:**

First Name: **Organisation:** Barratt and David Wilson Homes Cambri

Surname:

Comment **Object**

Policy LP22, which provides a design and location led policy towards parking provision is supported and is considered to be a sound approach in planning terms.

It is however considered that the car parking standards in relation to 4 bedroom dwellings needs to be reviewed, particularly given that the policy sets out that garages will not be counted towards a parking space. A garage of dimensions 6m x 3m is usable as a parking space and no substantiated evidence has been provided to the contrary. This approach will lead to poor design with a proliferation of over-sized garages or housebuilders will simply choose not to provide garages for plots that are marginal which would be to the detriment of occupiers.

The requirement for all 4 bedroom dwellings to have an a minimum of 3.2 car parking spaces per dwelling, with an additional requirement for 0.25 visitor parking on unallocated space is more parking than will be required for most 4 bedroom dwellings, particularly within the more sustainable locations within the larger settlements. Having 0.2 of a space will be difficult to put into practice as every 5th dwelling will have an extra space (who will be allocated this space?). This may lead to conveyancing issues. The logic of this approach is questioned.

The need to avoid vehicles parking on the street or blocking the public highway is fully understood, however it is important that a balance is struck between the need to provision for parking and ensuring good urban design and place making principles are followed. The requirement for all 4 bedroom dwellings to have a minimum of 3 spaces on plot, is likely to result in parking being provided in prominent locations or result in reduced garden sizes. For a number of 4 bedroom households, particularly with younger children, it is unlikely 3.2 spaces on plot will be required. In addition a number of four bedroom houses use the fourth bedroom as a study rather than a bedroom.

It is therefore considered that the number of parking spaces for four bedroom dwellings should be reduced to 2.2 spaces per dwelling or the policy is changed to allow for larger garages to count towards a parking space.

There is a lack of specific cycle parking standards. Policy LP22 only refers to 'appropriate' provision which leaves the door very open and provides no surety. It is considered that a more sound approach would be to either specify a standard or refer to CCC guidance (if any is in place).

In its current form the policy is considered to be unsound, in that it will compromise good design principles, contrary to policies 126 and 127 of the NPPF. At a minimum further evidence should be provided to demonstrate how the standards as set out within Appendix 6 have been calculated.

Title: **Position:**

First Name: Susie **Organisation:** St John's College Cambridge

Surname: Wood

Comment **Support**

Support the approach to include minimum standards but with the number of spaces provided, and their location and access, being informed by the site context and location. Also support for the policy requiring infrastructure for charging electric vehicles as set out in Building Regulations Part S, rather than seeking to set a separate requirement which could in the future be inconsistent with the Building Regulations requirements.

LP22: Parking Provision

Title:

Position:

First Name: Carole and Susan

Organisation:

Surname: Fisher

Comment **Object**

We consider that an adequately sized single garage should count towards car parking space provision. Removing this allowance we simply result in developments not including garages at all. Garages can assist with storage requirements as well as introducing important design variations to developments.

The rationale for excluding garages from counting towards parking spaces is unclear.

The policy is at present not sound as it is not justified or effective.

Title:

Position:

First Name: Paul and Belinda

Organisation:

Surname: Clark

Comment **Object**

We consider that an adequately sized single garage should count towards car parking space provision. Removing this allowance we simply result in developments not including garages at all. Garages can assist with storage requirements as well as introducing important design variations to developments.

The rationale for excluding garages from counting towards parking spaces is unclear.

The policy is at present not sound as it is not justified or effective.

Title:

Position:

First Name: Victoria

Organisation: Barton Willmore

Surname: Yeandle

Comment **Neutral**

Metalcraft acknowledges this Policy, regarding Parts B, C and D.

The Vision Document and accompanying Transport Technical Report includes indicative car parking need. The final details on numbers will be determined as the buildings come forward (depending on the type of commercial use). Metalcraft will work with all stakeholders, including FDC and Cambridgeshire County Council to ensure that there is sufficient car parking to meet policy requirements, service needs, disabled and cycle parking for the type of commercial use.

Metalcraft acknowledge the requirements for EV charging set out in Part D of the draft Policy. As with the parking for Parts B and C, Metalcraft will continue to work with all stakeholders to ensure that an future scheme seeks to adhere to the Part S of the Building Regulations.

LP22: Parking Provision

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

Comment **Object**

I do not agree with a single garage being excluded as part of the parking provision and a double garage being counted as only a single space. It would be sensible to impose a minimum size for such garages to count towards parking provision rather than just exclude eg minimum length of 6m and minimum width of 3m for single and 5.5m for double for all spaces to be counted towards parking requirement so there is room to fit a vehicle within the garage and exit from it.

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

Comment **Neutral**

Whilst Policy LP22 requires appropriate cycle parking to be provided the policy Appendix 6 do not set a standards or specifications for cycle parking. Cycle parking should be provided for all use classes of development to promote active travel and the resultant health benefits that will accrue.

The E use class (medical etc.) may need additional larger spaces/drop-off areas for ambulance(s) or other large vehicles in addition to the car parking requirements. Cycle parking should be provided. As the model of services delivered from these use class changes the parking requirements may also need to change. The model used “parking spaces per consulting room” may no longer be fit for purpose as the model of health care is shifting towards combined surgeries/health centres etc. and colocated services, as such advice should be sought from the Cambridgeshire and Peterborough Integrated Care System, NHS England, Cambridge Community Services and Cambridgeshire and Peterborough Foundation Trust.

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

Comment **Object**

We consider that an adequately sized single garage should count towards car parking space provision. Removing this allowance we simply result in developments not including garages at all. Garages can assist with storage requirements as well as introducing important design variations to developments.

The rationale for excluding garages from counting towards parking spaces is unclear.

The policy is at present not sound as it is not justified or effective.

LP22: Parking Provision

Title:

Position:

First Name: Daron

Organisation:

Surname: Wild

Comment **Neutral**

Parking spaces relating to applications causes a lot of issues. Firstly, there seems to be rule that if you develop a High Street property into flats you don't need to provide any parking. I don't see that mentioned anywhere. Secondly, once an application is approved nobody then comes out to check. Building regs checks are done, but not planning checks.

Title: Ms

Position: Chartered Town Planner

First Name: Shanna

Organisation: Swann Edwards Architecture Limited

Surname: Jackson

Comment **Object**

We consider that a single garage should count as a parking space if it is of a sufficient size as is specified within the Local Plan.

Title: Mrs

Position: Parish Clerk & RFO

First Name: Sarah

Organisation: Wisbech St Mary Parish Council

Surname: Bligh

Comment **Neutral**

Parking – Sayers Crescent in Wisbech St Mary has highlighted the need for better parking on new developments we recommend a parking space per bedroom. Rural areas due to cuts have less access to bus routes and rely on cars/vans to travel to and from their places of work and education, these need areas to park on without causing issues on the highway for HGVs and FDC refuse lorries.

Title: Ms

Position: Chair

First Name: Ruth

Organisation: Doddington Parish Council

Surname: Hufton

Comment **Object**

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

LP22: Parking Provision

Title: Councillor

Position:

First Name: Gavin

Organisation: Parson Drove Parish Council

Surname: Booth

Comment **Object**

LP22 – Parking provision should be different for rural areas (particularly those without access to public transport). Provision in rural areas should be one space to each bedroom.

Title:

Position:

First Name: Valerie

Organisation:

Surname: Lavender

Comment **Support**

Due consideration must be given to parking for powered two-wheelers and electrical charge points for those powered by battery. There is very little in the way of powered two-wheeler parking throughout Fenland. In many cases it is difficult to find and an afterthought. Powered two-wheeler parking requirements are frequently overlooked. Users should be able to park their vehicle in a secure place; at home, at work, and at play, as well as when out shopping. If you would like more details or assistance feel free to contact the Motorcycle Action Group www.mag-uk.org

19: Historic Environment

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

Comment	Object
Paragraphs 19.3 and 19.5	

Paragraph 19.13
The wording of this paragraph should be amended to reflect the requirement of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Paragraph 19.1 (should be 19.15)
The paragraph should be re-worded to state the statute position first. Whilst it is a material planning consideration it is also a requirement under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

19: Historic Environment

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

Comment Object

Paras 19.18-19

Archaeology – is this section just referring to non-designated and unknown archaeology or also Scheduled Monuments? This needs to be made clear.

Suggested Change - Make clear if this is referring to all archaeology (designated and non-designated) or just non-designated.

Section 19

We advise that reference should be made to other non-designated heritage assets including a Local List.

In national policy terms, 'non-designated heritage assets' (including those on a local list) are recognised as having a degree of significance meriting consideration in planning decisions. Paragraph 135 of the National Planning Policy Framework states that decisions on applications affecting such assets will require a balanced judgment that has regard to the significance of the asset and any harm or loss:

<http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/12-conserving-and-enhancing-the-historic-environment/>

Government guidance recognises that local lists and local criteria for identifying non-designated heritage assets are a positive thing and can help with decision-making:

<http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/what-are-non-designated-heritage-assets-and-how-important-are-they/>

We would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets, and ideally has a local list of assets linked to planning policies in their Local Plan. A good example is Peterborough:

http://www2.peterborough.gov.uk/environment/listed_buildings/locally_listed_buildings.aspx

There are enough appeal cases to indicate that inspectors regard non-designated heritage assets, and something on a local list, as an important material consideration in planning decisions. In fact, where there isn't a local list, some inspectors have been unable to give as much weight to a non-designated heritage asset. Our website contains a number of appeal cases and if you search for 'locally listed heritage asset' or 'non-designated heritage asset', you will get relevant ones: <http://www.historicengland.org.uk/advice/hpg/planning-cases/>

Robust provision for these heritage assets will increase the soundness of your forthcoming plan. It is therefore important to include a policy for non-designated heritage assets in the Plan.

We understand that Fenland is part of the wider Cambridgeshire Local List pilot project. <https://local-heritage-list.org.uk/cambridgeshire> This should be referenced in the Local Plan.

Include a section in the supporting text on Heritage at Risk.

Suggested Changes

Make reference to non-designated heritage assets including Local List.

Establish criteria for identifying non-designated heritage assets and include in Plan.

Include policy for non-designated heritage assets in Plan.

Include reference to Cambridgeshire Local List Pilot project.

19: Historic Environment

Include a section in the supporting text on Heritage at Risk.

Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment	Support		
Paras 19.1 – 19.8			
We welcome this helpful description of the landscape character of Fenland and the individual characteristics of the market towns and villages. It provides a helpful portrait of the historic environment of the district.			
Paras 19.11 – 19.17			
It is helpful to have these sections on designated heritage assets			

19: Historic Environment

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

Comment **Neutral**

Thank you for consulting Historic England on the Fenland Draft Local Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

The largely rural district of Fenland comprises 4 market towns and around 30 villages. Located at the north eastern corner of the Oxford -Cambridge Arc, the district is the most deprived in Cambridgeshire but has ambitions for growth. The big skies and flat open landscapes with a network of watercourses are rich in heritage with numerous listed buildings, 20 scheduled monument, 120 conservation areas and the Registered Park and Garden of Peckover House.

It is for this reason that Historic England is keen to ensure that the emerging plan gives full consideration to the historic environment, both in the choice of site allocations and policy criteria for sites, as well as through a robust and clear suite of historic environment and other policies that seek to both protect but also enhance the historic environment.

We have reviewed the Draft Plan and consultation material with a view to providing advice on heritage matters.

As a general comment, Historic England welcomes emerging plan and work undertaken to date.

We have however identified five key issues to be addressed in progressing the next iteration of the Plan;

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

These issues are explored in more detail below.

This letter should be read in conjunction with Appendix A and B which provide more detailed comments on these and other more minor issues.

a) Insufficient Site Assessment and the need for Heritage Impact Assessments

We are pleased to note that a degree of site assessment has already been undertaken in relation to the historic environment.

To date, the assessment of sites is fairly high level and brief. As we have discussed previously, further assessment of heritage in terms of significance, impact on that significance, potential mitigation and enhancements etc will be needed for the site allocations. There is currently an insufficient evidence base in this regard.

This further assessment, known as Heritage Impact Assessment (HIA) should follow the 5 step methodology set out in out in our advice note, HEAN 3 on Site Allocations in Local Plans <https://historicengland.org.uk/imagesbooks/publications/historic-environment-and-site-allocations-in-local-plans/>. We have identified a number of sites that require Heritage Impact Assessment in Appendix B. These assessments should be prepared prior to the next draft of the Local Plan.

19: Historic Environment

HIAs should be proportionate (both to the scale of the site and the assets affected). All potential sites will need to be appraised against potential historic environment impacts. It is imperative to have this robust evidence base in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or inter-visibility with, a potential site.

Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base. Cumulative effects of site options on the historic environment should be considered too.

Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable.

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

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

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

Which sites require HIA?

For new allocations we have identified which sites require further assessment in Appendix B. The HIA will be a more holistic view and consider both the principle of development as well as the other matters identified above.

For extant permissions being carried forward into this Local Plan as allocations you will need to decide if an HIA is required. In this instance, the HIA is less about the principle of development (that has already been established through the development management process) and more about exploring capacity, height, density and any heritage mitigation and enhancement opportunities so that these can then be included in the policy wording.

It is important to note that due to capacity we have not reviewed all of the extant permissions sites in this plan. However, we have made a general comment that if you are including these sites as allocations in your plan, we would expect each site to have policies with criteria. (see appendix b for more detail).

b) Policy Wording for sites

If, having completed the heritage impact assessments, it is concluded that a site is suitable for allocation, appropriate policy criteria for the historic environment should be included in the policy.

We note that many of the allocations already have a fairly generic criterion for the historic environment, for example 'Safeguarding of the setting and character of the nearby conservation area, listed buildings and non-designated heritage assets'.

Instead we suggest the use of the phrase 'Conserve or where appropriate enhance...'. We also suggest the specific heritage assets are mentioned in the policy. In addition, the policy should specify appropriate mitigation and enhancements as identified through the HIA.

It can be helpful to refer to an HIA in the policy wording. Concept diagrams can also be useful to include in the plan to

19: Historic Environment

illustrate key site considerations/recommendations.

Please refer to the more detailed advice we give on policy wording in the attached table.

We also advise that the allocations of extant planning permissions should also have policy criteria in the Plan. Further advice on this is given in Appendix B.

c) Historic Environment Section

We welcome the inclusion of a policy for the historic environment. Policy wording should be in line with the NPPF but we are also looking for a local flavour. Policies should be spatially specific, unique to the area, describing the local characteristics of the area and responding accordingly with policies that address the local situation.

In particular the following aspects are currently missing and need to be included in the policy:

- Non-designated heritage assets (including criteria for identifying NDHA)
- Separate sections on Listed Buildings, Registered Parks and Gardens and Scheduled Monuments in the policy itself
- Heritage at Risk should be a bullet point

d) Design Policy

We broadly welcome the proposals for a design policy on the plan. We suggest the policy should give more guidance on policy approach to building heights.

e) Renewable Energy

We are concerned that the two allocations for wind turbines do not appear to have been based on evidence. We are also concerned that the whole of the district is allocated for smaller scale wind turbines. We advise that such allocations should be based on appropriate assessment, including of the historic environment.

Para.155 of the NPPF advises LPAs to consider identifying suitable areas for renewable and low carbon energy sources in their plans and strategies.

Our advice note 15 on Commercial Renewable Energy Development and the Historic Environment includes advice on an appropriate methodology for identifying such areas in Plan making (see paras 23- 27; i.e. all heritage assets in the area should be identified, arbitrary distance measurements should be avoided, and the setting of heritage assets should also be included as a consideration).

Therefore, as far as we are aware there is insufficient evidence base to support the identification of areas suitable for such development– it is not justified in terms of potential impacts on the historic environment. We would like to discuss this with you further.

Other comments

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

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

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific

19: Historic Environment

proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

We trust that these comments are helpful to you in developing the Local Plan. Should you have any queries, please do not hesitate to contact us.

We suggest it might be helpful to set up a meeting to discuss our comments and, in particular, heritage impact assessments and policy wording for site allocations. Please feel free to suggest some dates.

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

Comment	Object
'19.8 The Council is committed to the positive conservation of heritage assets in the district as they make an important contribution to the identity, distinctiveness and character of Fenland. 19.9 The NPPF defines the term heritage asset as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.	

(and) Policy LP23: Historic Environment

The Council recognises that the historic environment plays an important role in the identity of the area and the quality of life experienced by local communities in Fenland. It will protect, conserve and seek opportunities to enhance the rich and diverse heritage assets and their settings, for the enjoyment of current and future generations.'

Bridleways and other rights of way are heritage assets which are special because they have been created by the people for the people not by the wealthy and powerful. The green bridleway network (including restricted byways and byways) should be included within this conservation and protected for future generations. Once disturbed for 'improvement' (often a word for acquisition by another user) these paths which have taken hundreds of years to establish with their own eco environment, can never be restored. They should be protected for what they are.

Title:		Position:	
First Name:	Alan	Organisation:	
Surname:	Bessant		

Comment	Object
19 Historic environment 19.8 positive conservation of heritage assets (Page 82)	
Heritage is mentioned 67 times in the plan. Whittlesey residents question the commitment to maintaining heritage assets and for Whittlesey maintain a Fenland market town and a vibrant piazza feel in the square. As one example The Church of St Mary dates from the 13th century and the walk to it from the square should be the jewel in the crown for local heritage and the history of Whittlesey. How was planning permission for the modern mixed construction flats allowed/ how is this in keeping with this important and historic area (see photo attached). Residents would like to see a stronger commitment that decisions like this will not be so readily supported in the future.	

LP23: Historic Environment

Title: Councillor **Position:**

First Name: Ruth **Organisation:** Doddington Neighbourhood Plan Group

Surname: Hopkins

Comment **Object**

The policy should reflect the wording of the statute within the Planning (Listed Buildings and Conservation Areas) Act 1990. The policy does not in the opinion of the Group identify the level required to be able to demonstrate compliance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

Title: **Position:** Principal Environmental Planner

First Name: Chris **Organisation:** Lightsource bp

Surname: Atkinson

Comment **Neutral**

Underneath the ‘Archaeology’ heading, the policy states that ‘In the case of application sites which include, or could potentially include, heritage assets with archaeological interest, designated or non-designated, the Council will require the developer to carry out a preliminary desk-based assessment’. In regard to this stipulation, the Council should clarify that this work isn’t necessarily required prior to determination, and each case should be taken on its merits.

Title: **Position:**

First Name: Lawrence **Organisation:** Friends of Wenny Road Meadow

Surname: Weetman

Comment **Support**

Support, with suggestions for improvement:

The Friends of Wenny Road Meadow think that LP23, about the historic environment, is about right.

The policy should be improved through explicit reference to the protection of historic landscapes, including landscape parks and historic earthworks.

LP23: Historic Environment

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

Comment	Object
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We recommend that this policy is amended to include reference to both designated and non-designated heritage assets.

It would be helpful to have sections on Listed Buildings, Registered Parks and Gardens and scheduled monuments as well as Non-designated heritage assets.

Is the sentence on Heritage at Risk supposed to be a bullet point in the above list?

Suggested Changes

Include reference to designated and non-designated heritage assets

Include sections on Listed Buildings, RPGs and scheduled monuments

Include section on Non designated heritage assets

Make the Heritage at Risk sentence a bullet point

Title:		Position:	
First Name:	Kirsty	Organisation:	
Surname:	Patterson		

Comment	Support
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I support the policy on the Historic Environment.

The Chatteris Conservation Area has been on Historic England’s “at risk” register since 2015. The Local Plan should make explicit reference to this, and should incorporate a policy of actively trying to enhance the Chatteris Conservation Area.

The local plan should include a commitment to the enforcement of Listed Building and Conservation Area rules, in particular with reference to buildings where wooden windows have been inappropriately replaced with plastic windows within the conservation area. The council should implement an Article 4 direction for conservation areas so that these changes can be managed, especially in Chatteris where the conservation area is at risk.

The demolition and substantial alteration of Listed Buildings and other heritage assets within a conservation area should not be permitted.

The draft plan says that there will be an emphasis on developers using “Conservation Area Appraisals and associated Management Plans to ensure the preservation and where possible enhancement of the special character or appearance of each of Fenland’s Conservation Areas”. There are currently no such Conservation Area appraisals in place for most of Fenland’s Conservation Areas. The local plan should include a commitment from the council to produce and maintain these.

LP23: Historic Environment

Title:		Position:	
First Name:	Victoria	Organisation:	Barton Willmore
Surname:	Yeandle		
Comment	Neutral		

Metalcraft acknowledges the Policy.

Given the proposed allocation's proximity to Listed Buildings and the Conservation Area in Chatteris, it is unlikely that the proposals will adversely affect their setting especially as the buildings are screened by the existing commercial buildings on the Metalcraft Site and the NCTC. There are no designated heritage assets within the site and the only known features are of local interest only.

The representations have also been accompanied by an Archaeology Technical Report. The potential for archaeological remains to survive across the site is anticipated to be moderate at best with localised archaeological survival confined to features cut into the underlying geology. As such there would be no fundamental issues on the deliverability of the site regarding any surviving archaeological remains.

The Note confirms that any future planning application would be accompanied by an assessment to determine if there is a need for further archaeological investigation. Metalcraft will work with all stakeholders as the Local Plan continues.

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

Bridleways and other rights of way are heritage assets which are special because they have been created by the people for the people not by the wealthy and powerful. The green bridleway network (including restricted byways and byways) should be included within this conservation and protected for future generations. Once disturbed for 'improvement' (often a word for acquisition by another user) these paths which have taken hundreds of years to establish with their own eco environment, can never be restored. They should be protected for what they are.

Title:		Position:	
First Name:	Katie	Organisation:	
Surname:	Leach		
Comment	Support		

Fenland's historic environment is intrinsic to the district's character and sense of place. Our towns and villages all have their own identities which defines them and this is strongly defined by the built environment. We must protect our heritage.

LP23: Historic Environment

Title:

Position:

First Name: Nicola

Organisation:

Surname: Duncan-Finn

CommentSupport

The Historic built environment of Fenland is rich and contributes markedly to the sense of place and local identity. Protection provided for Heritage assets and cultural heritage sites, including archaeology, within this section is very welcome. In discharging the legal duty of care for the historic environment - it will be critical to ensure both elected members and planning decisions act responsibly in line with guidance within National Heritage Policies in the NPPF.

Title: Ms

Position: Chartered Town Planner

First Name: Shanna

Organisation: Swann Edwards Architecture Limited

Surname: Jackson

CommentSupport

Policy LP23: Historic Environment

Question whether there is an updated Building of Local Interest list whereby non-designated heritage assets can be easily identified.

20: Natural Environment

Title: Mr **Position:** Planning Officer

First Name: Graham **Organisation:** Middle Level Commissioners

Surname: Moore

Comment **Neutral**

Table 8 - Page 96

It is uncertain why the “Linear waterways, river and ditches” are only included in the Wisbech Settled Fen entry when they are relevant to all the entries.

Title: Mr **Position:** Planning Officer

First Name: Graham **Organisation:** Middle Level Commissioners

Surname: Moore

Comment **Neutral**

Item 20.46 (Page 94)

Comment - The contents of the second bullet point are noted and are largely correct. However, to be of most benefit any tree planting needs to occur in the higher extents of a catchment to reduce and slow flows entering the lower “fen” system. However, this may be difficult to achieve in your Council’s area as this is likely to be in conflict with current and/or future allocations where development would be taking place.

Title: Mr **Position:** Planning Officer

First Name: Graham **Organisation:** Middle Level Commissioners

Surname: Moore

Comment **Support**

Comment - It is pleasing to note the inclusion within the text of Item 20.15 (Page 87) references to the success of the Biodiversity Action Plans (BAPS) undertaken by the Commissioners and the other Boards within the Council’s area which have benefitted protected species and habitats and provided biodiversity benefits since their introduction.

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

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

Surname: Mack

Comment **Object**

Para 20.55

We welcome the reference to heritage in the first bullet point of this paragraph. We suggest replacing built heritage with the term historic environment, a slightly broader term in line with the NPPF.

Suggested Change - Replace ‘built heritage’ with the term ‘historic environment’

20: Natural Environment

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

Comment **Neutral**

Goose and Swan Functional Land - We suggest reference to the Habitats Regulations 2019 is explained in the glossary, or alternatively, the full reference to the legislation is provided in paragraph 20.5.

Habitats – irreplaceable, priority and local BAP habitats - Paragraph 20.15 discusses the drainage network as important habitat and does not really fit within the “Goose & Swan Functional Land Impact Risk Zone (IRZ)” heading. We suggest a new heading of “irreplaceable and priority habitats.”

Natural England is currently writing guidance that will provide a definition and a definitive list of irreplaceable habitats in England. The Local Plan should provide considerations of these habitats within Fenland, such as lowland fen or veteran trees (if present).

Consideration should also be given to priority habitats present within the area. Details surveys of priority habitats should be included as part of scheme design. In addition, the presence of priority habitats should be considered as part of Allocated Site assessments and mapping of ecological networks. This should include priority habitats identified within National Priority Habitat Inventories and mapping projects by the Cambridgeshire and Peterborough Environmental Records Centre (e.g., traditional orchards and woodlands).

We agree that the extensive waterways and ditch network are key wildlife corridors within the landscape. It should also be recognised that drainage ditches are identified as a local biodiversity action plan habitat, with many watercourses supporting notable and aquatic plant and invertebrate species and assemblages. It is important that adequate survey work is completed to determine impact on these important habitats / species. Furthermore, it would be beneficial to recognise the importance of the area for fen habitat and habitats supporting fen specialists, including priority and notable species, as identified within the Fenland Biodiversity Audit 2012.

Species - The subsection “protected species” discusses priority species, rather than protected species. We suggest this section be expanded to include “protected, priority and notable species” with additional text relating to protected species found within Fenland (e.g., water vole, otter, bats) and referencing locally important species listed in the Cambridgeshire and Peterborough Additional Species of Interest.

20: Natural Environment

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

Comment **Neutral**

20.3, p.85

Although we support the Council's objectives to contribute towards the Doubling Nature target, we are disappointed that there are no measurable targets associated with this either as a percentage/area of land area under management for nature, or managed in a way that benefits nature. An aspiration to contribute is just that unless it is followed through with measurable outputs and outcomes.

20.11 p.86

Amend wording to indicate these are two separate designated areas, which is not clear at present.

20.12, p.86

Although the RSPB agrees that 'major development' is most likely to trigger the requirements of HRA with regards to the Goose and Swan Impact Risk Zone, this is not a fool-proof definition, as the test is likely significant effect, and this could be triggered by smaller developments that might impact on the functionally linked bird populations using the zone – for example, collision risk from a single commercial wind turbine, or disturbance from a commercial clay-pigeon shoot. Suggest wording amended to include the potential for exceptions to 'major development' to trigger HRA.

20.18, p.88

This wording will be out of date by the time the plan is approved. Suggest this needs to be amended to include reference to the Biodiversity Net Gain requirements set out in the Environment Act 2021, and upcoming Regulations and guidance.

20.23 – Biodiversity Net Gain, p.91

Surely it is also Fenland DC's ambition to double nature by 2050, as you are an integral part of Natural Cambridgeshire, please amend the wording to own this.

20.19, p.88

Second sentence – replace 'should' with 'must'. Justification – the mitigation hierarchy must be applied in all circumstances, to be consistent with the other 'must' statements in this paragraph.

20.46 Trees and Hedgerows, p.94

Please include 'use native species' as a sixth tree planting principle, or include this as part of principle five on appropriate species to the site. Native species are much more likely to adapt to local conditions and generally support more biodiversity than ornamentals.

20.52-20.58 p.98

Please include reference to the NHBC guide on 'Biodiversity in New Housing Developments' as a yardstick for how green infrastructure can be integrated into developments. https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf

20: Natural Environment

Title:		Position:	Regional External Affairs Officer - Centra
First Name:	Ben	Organisation:	The Woodland Trust
Surname:	Green		

Comment	Object
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The Woodland Trust is the UK's leading woodland conservation charity. We own over 1,000 woods throughout the UK and our head office is in Grantham. Our aims are to protect existing woodland, create new woodland, and enable people to enjoy and appreciate woodland.

Trees and forests are crucial to life on our planet. They stabilise the soil, generate oxygen, store carbon, play host to a spectacular variety of wildlife, and provide us with raw materials and shelter. They offer us respite, inspire our imagination, creativity and culture, and refresh our souls. A world without trees and forests would be barren, impoverished and intolerable.

We are interested in working with Fenland District Council in developing policies beneficial to trees and woodland in its Draft Local Plan (DLP). We would also like to work with the Council to enable it to better protect woodland, particularly irreplaceable habitats such as ancient woodland and ancient and veteran trees, and to plant trees as part of a well-planned network of green infrastructure.

Fenland District Council's tree cover is just 0.53 per cent, which contrasts starkly to around 13 per cent for the UK and an average of 38 per cent across the EU. Therefore, we believe that woodland creation should be a major priority for a Draft Local Plan.

Principally, it is key to select the right tree for the right place and, while we recognise the role non-native trees will play in meeting near-term targets, as well as the ability of some to confront specific concerns like air pollution on busy streets, they should be minimised both to prevent the introduction of pests and diseases through tree importation (viz. biosecurity risk) and to offer the greatest ability for already-existing flora and fauna to benefit. The maximum possible proportion of new trees should be native, and UK and Ireland Sourced and Grown (UKISG). Not only are some pests hazardous to human health, but supporting local nurseries and tree growers confers an economic benefit.

It is essential that the climate and nature crises are addressed jointly, with trees' remarkable ability to fight each recognised by the DLP. So, while encouraged by the DLP's references to trees' biodiversity contribution, and extensive recognition of Biodiversity Net Gain (BNG), we would like it to go further, assigning definite BNG targets while grasping future opportunities afforded by Local Nature Recovery Strategies (LNRSes) required by the Environment Act 2021. Complementing these should be a robust commitment to protection, enshrining the irreplaceable nature of ancient woodland, and individual ancient and veteran trees.

Specifically, we would like to see the DLP expand on these environmental principles in the following ways.

1. **Protection of valued habitats must be at the heart of the DLP.** In particular, irreplaceable habitats, including ancient woods and veteran trees must be protected from loss and damage. To achieve this, the DLP should:
 - **Stipulate a minimum 50 metre buffer for development from ancient woodland where developments exceed 10 dwellings.** This is to minimise indirect impacts from urbanisation, including light and chemical pollution, and recreation on the ecological integrity of ancient woodland.
 - **Protect ancient woodland sites through strong policy in the DLP.** We would welcome the opportunity to help develop suitable policy wording as the DLP is brought forward. Our Planners' Manual for Ancient Woodland and Veteran Trees (1) includes guiding principles and examples of policy wording.
 - **Give weight to the relevant LNRS, as it is refined, which should identify ancient woodland sites, to ensure that development is not allocated in close proximity to ancient woodland.**
 - **For veteran trees, the DLP should encourage them to be recorded on the Ancient Tree Inventory, and to consider locations where it might be suitable to place a Tree Preservation Order on any ancient, veteran or notable trees recorded.** In addition, the DLP should encourage a buffer zone to go beyond the minimum distances stipulated in planning advice.

20: Natural Environment

2. The DLP must go beyond minimum requirements for BNG and be an example of best practice.

- The DLP should require development projects to deliver 20 per cent BNG, accepting the recommendation contained in paragraph 5.35.(2)

- Consideration should be given to the quantum of other investment sources (public and private) which will be needed in order to meet these targets.

- The DLP should require BNG units to be maintained for a minimum of 50 years, not just the 30 set out in the Environment Act.

• This is particularly important for woodland creation, as it takes many decades for new woods to reach maturity and their full ecological potential.

• BNG should deliver a rich mix of habitats including native woodland, informed by LNRs.

• Habitat creation funded through other mechanisms (such as public funds) should also be maintained in the long term.

3. The DLP should give strong weight to LNRs for development site allocation at a local level.

- This will be essential to embed avoidance of impacts to ancient woodland and other existing sensitive natural assets, by providing a 'spatial' element to site allocation decisions. It is vital that development is allocated in a way which protects important sites for nature, maintains ecological integrity and maximises potential enhancements from land in recovery.

- Once a site has been allocated in a local plan, it is more likely to receive planning permission, so it is essential to embed ecologically coherent criteria for spatial prioritisation at the framework level.

- LNRs should also be used to inform priority locations for the provision of green infrastructure, and habitat creation and enhancement through BNG.

4. The DLP should set standards for high-quality green infrastructure for development.

- Everyone should be able to see three trees from their home.

- Everyone should be no more than 300 metres from the nearest natural green space, with safe and accessible routes.

- Consideration should also be given to the Woodland Trust's Access to Woodland Standard which aspires that everyone should have a small wood of at least two hectares in size within 500 metres of their home and a larger wood of at least 20 hectares in size within four kilometres of where they live. Presently, on average, only 15.4 per cent of Fenland residents live within 500 metres of these small woodlands and up.

In summary, we consider that the Environmental Principles must be treated as a foundational component of the DLP. As part of incorporating the principles, the DLP must support the protection of sensitive natural assets, such as ancient woodland; be an exemplar of emerging BNG practice; and set high standards for the retention and provision of trees within developments.

(1) Planners' Manual for Ancient Woodland and Veteran Trees – Woodland Trust

(2) The Biodiversity Metric 3.0 – JP039 (naturalengland.org.uk)

20: Natural Environment

Title:		Position:	
First Name:	Alan	Organisation:	
Surname:	Bessant		
Comment	Object		
Para 20.39			
We have seen a number of planning decisions for the area known as Saxon pit Whittlesey which have the potential to impact trees, flora and fauna from earthworks and pollution. We have seen the tree line and foliage around that area thinning. We are not aware of any detailed tree survey or arboricultural method statement being presented. Furthermore, in 2003 planning was granted for restoration of part of the Saxon Pit area which would have become a green space open to residents. Works should have taken 2-5 years. Some 19 years later we still have no overall plan for completion or any guarantee of public access. The area has also been contaminated with non-conforming waste. As local residents we do not have confidence that enough has been done in our location to honour these points.			

Page 94 Table 8 Whittlesey - refers to a degraded landscape in association with Hanson Brick to the west of the town. This is in part due to a failure of the planning and permit process by Government agencies. In 2003 planning was granted for restoration of part of the Saxon Pit area which would have become a green space open to residents. Works should have taken 2-5 years. Some 19 years later we still have no overall plan for completion or any guarantee of public access. The area has also been contaminated with non-conforming waste. As local residents we do not have confidence that enough has been done in our location to honour these points and wonder why a degraded landscape has been allowed/created by the planning system. A new company has also been allowed to set up works without planning permissions which enjoys permit approvals from the forestry commission. It is now subject to a retrospective enforcement planning application. It (together with other recycling operations strongly opposed by residents) has further degraded the area and scenic view potential. That is not related to Hanson Brick – more recent planning approvals. It seems to be a negative feedback loop if the look of the area is being created by government agencies and is then used to justify more of the same by this plan.

Title:	Mr	Position:	
First Name:	Martin	Organisation:	Wildlife Trust for Bedfordshire, Cambrid
Surname:	Baker		
Comment	Support		
Support paragraph 20.21			

Title:	Mr	Position:	
First Name:	Martin	Organisation:	Wildlife Trust for Bedfordshire, Cambrid
Surname:	Baker		
Comment	Neutral		
Para 20.17			
Amend the following sentence for factual accuracy, as the Biodiversity Partnership no longer runs an active website.			

The Cambridgeshire and Peterborough Biodiversity Partnership has published lists of priority species and additional species of interest that are locally important, which are available from the Cambridgeshire & Peterborough Environmental Records Centre.

20: Natural Environment

Title:	Mr	Position:
First Name:	Mark	Organisation:
Surname:	Hemment	
Comment	Support	
Paragraph 20.18:		
Agree that all new developments should have no net loss in biodiversity.		
<hr/>		

Title:	Mr	Position:
First Name:	Mark	Organisation:
Surname:	Hemment	
Comment	Support	
Paragraph 20.61:		
Support the designation of 'Wenny Meadow' (Land north of Wenny Estate, Chatteris) as a Local Green Space.		
<hr/>		

LP24: Natural Environment

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

Comment Object

We object to the inclusion of Part D “Goose and Swan Functional Land Impact Risk Zone” as a designated area. The Zone is an illustrative area showing a potential zone around the Nene Washes and is not a Nature Conservation designation in itself. The Zone is an indication of the potential area that will support the goose and swan population using the Washes, but not a guarantee the area is important for the Goose and Swan populations.

Contrary to the wording of the policy, the existence of an Impact Risk Zone (IRZ) is not a trigger for undertaking an Appropriate Assessment under the Habitat Regulations. It is not the place of Local Planning Policy to create new circumstances for undertaking Appropriate Assessments, which are more appropriately set out in the Habitat Regulations.

Government Guidance on the use of Appropriate Assessments lists the factors that will trigger an assessment. These are sites and developments impacting on:

- Proposed SACS
- Potential SPAs
- RAMSAR SITES
- Areas secured as sites compensating for damage to a European site.

(see full guidance at <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>)

The guidance advises a developer to check if there is an IRZ around a protected site to help assess if a proposal might affect a site. The IRZ is guidance, not a determinant in the need for undertaking an “Appropriate Assessment” under the Habitat Regulations. Indeed, Natural England’s comments when considering the application for development to the north of Whittlesey (application number F/YR15/0134/O - now proposed for allocation in the Local Plan as HELAA site 40042), as reported in the planning officer’s committee report, stated, “application is in close proximity to the Nene Washes and Bassenhally Pit Sites of Special Scientific Interest (SSSIs). The Nene Washes SSSI forms part of the Nene Washes Wetland of International Importance under the Ramsar Convention (Ramsar Site) and Special Protection Area. Advises that the proposal is not likely to have a significant effect on the interest features for the Nene Washes Ramsar and SPA has been classified. Advises that the Council is not required to undertake an Appropriate Assessment (AA) to assess the implications of this proposal on the site’s conservation objectives. In addition, are satisfied that the proposal as submitted will not damage or destroy the interest features for which the Nene Washes and Bassenhally Pit SSSIs have been notified and therefore advise that these SSSI’s do not represent a constraint in determining this application. In respect of protected species, refer to standing advice.”

The IRZ was not mentioned, just the proximity to the Washes themselves. The large scale development subject to application F/YR15/0134/O was not considered to damage the Washes area, or the surrounding habitat, despite lying in a narrow neck of land between the Washes and Whittlesey itself, suggesting that similar conclusions would be reached in other areas across the IRZ. It is reasonable to suppose sites further from the Washes and less constrained by existing development would have a lesser impact on geese and swans. If a large scale development in the narrow area of land between the Washes and Whittlesey does not warrant an Appropriate Assessment, there is every indication other land elsewhere in the IRZ further away from the Washes and less constrained by development will similarly not be subject to this requirement either. Although it is possible sites much further away from the Washes may have an impact on the protected sites triggering the requirement for an Appropriate Assessment, if the development proposals affect the flight paths or the roosting and feeding habits of the geese and swans.

As such, the inclusion of Section D of Policy 24 and showing the IRZ on the Policy Plan is not justified or necessary. The Policy wording is inaccurate in stating the need for an Appropriate Assessment, under the Habitat Regulations. It is just one of many factors to be considered.

The inclusion of the IRZ on the Policy Plan itself is misleading; implying the area has a special status beyond being a

LP24: Natural Environment

buffer drawn a certain distance around a protected site. Picking one feature from Magic Maps to show on the Proposals Map gives undue priority to that issue and may prejudice an appropriate assessment of a site on other grounds.

When considering a proposal, a developer will refer to Magic Maps when deciding whether an Appropriate Assessment is required. Removal of the wording in Policy 24 and the designation on the Proposals Map will not prejudice appropriate consideration of the Habitat regulations.
Section D of Policy 24 should be deleted and the IRZ notation should be removed from the Policy Plan.

Title:		Position:	
First Name:	Patricia	Organisation:	
Surname:	Brooks		
Comment	Support		
This policy actively seeks to protect the ecological network surrounding Chatteris. Item c) states that development of biodiverse sites will only be permitted where the need and benefits outweigh the loss of environment. In this case the loss to the local community of Wenny Meadow's natural environment impacts the 996 people (and their families) who voted in the local poll for it to become a Local Green Space, which to my mind outweighs the benefit of building new houses on this site.			

Title:	Mr	Position:	
First Name:	Martin	Organisation:	Wildlife Trust for Bedfordshire, Cambrid
Surname:	Baker		
Comment	Support		
The Wildlife Trust supports the inclusion of this policy. However, bullet point vii. should be removed as it is clearly a typographical error following a previous amendment to the policy.			

LP24: Natural Environment

Title:		Position:
First Name:	Jane	Organisation:
Surname:	Mason	

Comment **Neutral**

As a general observation, Biodiversity offsetting was only intended to be implemented where damage to nature cannot be avoided. Today, following the failure of ‘avoidance’, the plan is then to ‘mitigate’ and ‘compensate’, thus facilitating every possible eventuality for development on local and national green sites - and even international sites designated for their nature conservation importance. No site is safe from the insatiable need for housing development.

Policy LP24 states that the Council will ‘promote the creation of an effective, functioning ecological network throughout the district, consisting of core sites, buffers, wildlife corridors and stepping stones that link to green infrastructure in adjoining local authority areas to respond to and adapt to climate change’.

The splitting in half of site 40284 (Land off Wenny Road, Chatteris) fragments the interwoven ecology of this unique site, further isolating rare and endangered insect populations, resulting in these species, as quoted in para 20.25, becoming “more prone to local extinction”. This will inevitably affect the survival of rare bat populations living at the site, who depend on insects for food. The remaining designated Local Green Space will not be sufficient to support the wealth of biodiversity currently living on site 40284, should development be permitted on the remaining half.

Surely, in a climate crisis, protection of the natural environment should be paramount? LP24 is riddled with ‘imperative reasons’, ‘significant adverse impacts’ and why the ‘need for and benefits of a development clearly outweigh’ the rights of nature.

The protection of the natural environment requires action that will actually protect; not words that justify the destruction of valuable and cherished green spaces.

Once it’s gone, it’s gone forever!

Title:		Position:
First Name:	Nicola	Organisation:
Surname:	Duncan-Finn	
Comment	Support	
Protecting the natural environment in fenland will be critical to securing a sustainable future for our communities.		

LP24: Natural Environment

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

Comment **Neutral**

Policy LP24 – Natural Environment, p.88-90

First bullet – please include ‘swamp, fen and reedbed’ as priority habitats here. Justification – these are priority wetland habitats which the council should be encouraging within the plan area.

Add an additional bullet to say ‘Implement the Local Nature Recovery Strategy in its planning functions once this document is adopted’. Justification – the LNRS for Cambridgeshire and Peterborough is very likely to have been adopted (end of 2023) by the time this local development plan is adopted, and the council will need to demonstrate that it is taking the LNRS into account.

Part A, Bullet vii – remove this wording to a footnote, as, as it says, monitoring cannot be counted as mitigation in itself, and should not be part of this list.

Part A, Bullet viii – this list is not comprehensive. Suggest also mention at least potential mitigation for noise and light pollution, water pollution and flood control measures where this might impact a Habitats site. Suggest sentence setting up these bullets reads ‘mitigation, for example, may involve...’ as this indicates that this is not a comprehensive list.

Part A(d) Goose and Swan Functional Land Impact Risk Zone – as stated before, there is the possibility that non ‘major development’ in the IRZ may also trigger HRA if it was likely to have a significant effect on the Habitats sites eg: a commercial wind turbine or clay-pigeon shoot. Therefore suggest including wording ‘Non Major Development may also require HRA screening depending on its form and nature.’

Part B & Part C. Suggest replacing the words ‘should’ in these policy wording with ‘must’. These approaches to avoidance, mitigation, compensation, and finally enhancement through BNG should not be seen as optional.

LP24: Natural Environment

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

Comment Object

We object to the inclusion of Part D “Goose and Swan Functional Land Impact Risk Zone” as a designated area. The Zone is an illustrative area showing a potential zone around the Nene Washes and is not a Nature Conservation designation in itself. The Zone is indication of the potential area that will support the goose and swan population using the Washes, but not a guarantee the area is important for the Goose and Swan populations.

Contrary to the wording of the policy, the existence of an Impact Risk Zone (IRZ) is not a trigger for undertaking an Appropriate Assessment under the Habitat Regulations. It is not the place of Local Planning Policy to create new circumstances for undertaking Appropriate Assessments, which are more appropriately set out in the Habitat Regulations.

Government Guidance on the use of Appropriate Assessments lists the factors that will trigger an assessment. These are sites and developments impacting on:

- Proposed SACS
- Potential SPAs
- RAMSAR SITES
- Areas secured as sites compensating for damage to a European site.

(see full guidance at <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>)

The guidance advises a developer to check if there is an IRZ around a protected site to help assess if a proposal might affect a site. The IRZ is a guidance, not a determinant in the need for undertaking an “Appropriate Assessment” under the Habitat Regulations. Indeed, Natural England’s comments when considering the application for development to the north of Whittlesey (application number F/YR15/0134/O - now proposed for allocation in the Local Plan as HELAA site 40042), as reported in the planning officer’s committee report stated, the “application is in close proximity to the Nene Washes and Bassenhally Pit Sites of Special Scientific Interest (SSSIs). The Nene Washes SSI forms part of the Nene Washes Wetland of International Importance under the Ramsar Convention (Ramsar Site) and Special Protection Area. Advises that the proposal is not likely to have a significant effect on the interest features for the Nene Washes Ramsar and SPA has been classified. Advises that the Council is not required to undertake an Appropriate Assessment to assess the implications of this proposal on the site’s conservation objectives. In addition, are satisfied that the proposal as submitted will not damage or destroy the interest features for which the Nene Washes and Bassenhally Pit SSSI’s have been notified and therefore advise that these SSSI’s do not represent a constraint in determining this application. In respect of protected species, refer to standing advice.”

The IRZ was not mentioned, just the proximity to the Washes themselves. The large scale development subject to application F/YR15/0134/O was not considered to damage the Washes area, or the surrounding habitat, despite lying in a narrow neck of land between the Washes and Whittlesey itself, suggesting that similar conclusions would be reached in other areas across the IRZ. It is reasonable to suppose sites further from the Washes would have a lower impact on the activities of the Geese and Swans. If a large scale development in the narrow area of land between the Washes and Whittlesey does not warrant an AA, there is every indication other land elsewhere in the IRZ, further away from the Washes and less constrained by development will similarly not be subject to this requirement either. Although it is possible sites much further away from the Washes, if they affect the flight paths, roosting and feeding habits of the geese and swans, may have an impact on the protected sites triggering the requirement for an Appropriate Assessment.

As such, the inclusion of Section D of Policy 24 and showing the IRZ on the Policy Plan is not justified or necessary. The Policy wording is inaccurate in stating the need for an Appropriate Assessment and inclusion of the IRZ on the Policy Plan itself is misleading, implying the area has a special status beyond that of a signifier of potential importance, which is not the case. Picking one feature from Magic Maps to show on the Proposals Map gives undue priority to that

LP24: Natural Environment

subject and may prejudice an appropriate assessment of a site. When considering a proposal a developer will refer to Magic Maps when deciding whether an Appropriate Assessment is required. Removal of the wording in Policy 24 and the designation on the Proposals Map will not prejudice appropriate consideration of the Habitat Regulations. Section D of Policy 24 should be deleted and the IRZ notation should be removed from the Policy Plan.

LP24: Natural Environment

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

We support the inclusion of Policy LP24: Natural Environment. We recommend rewording the policies to ensure that future development does not impact local and national designated sites. We have suggested alternative wording using bold text below:

Part A: Designated Sites

a) There is a presumption against development proposals within or outside a SSSI that are likely to have an adverse effect on a SSSI (either individually or in combination with other developments). Permission for such developments will only be considered if the benefits of the development clearly outweigh both the adverse impacts on the features of the site and any adverse impacts on the wider network of SSSIs. In such cases, appropriate mitigation or compensatory measures will be required.

c) Local Sites There is a presumption against development that is likely to have an adverse effect on locally designated sites, their features or their function as part of the ecological network, including County Wildlife Sites, Local Geological Sites and sites supporting Biodiversity Action Plan habitats and species. Permission for such development will only be permitted where the need and benefits of the development clearly outweigh the loss. In such circumstance, the coherence of the local ecological network must be maintained. In such cases, appropriate mitigation or compensatory measures will be required.

Part B: Biodiversity and Geodiversity in Development

Part B must be strengthened by incorporating measures to contribute to Water Framework Directive (WFD) objectives. As above, we have suggested alternative wording for this policy:

iv) Protect and enhance the aquatic environment within or adjoining the site, including water quality and habitat. For drain and riverside development this includes the need to consider options for contributing to WFD objectives, including riverbank naturalisation, removal of in-channel structures, de-culverting of piped watercourses, and riparian zone enhancements. In all cases regard should be had to the Cambridgeshire Flood and Water SPD

We also recommend that you add the following bullet points:

v) SuDS design should incorporate as many wildlife enhancements as possible, for example, varied contours and depths of ponds and drains, appropriate native planting, and maximising habitat connectivity.

vi) Creation of any new habitats should aim to maximise multiple benefits, for example SuDS, natural flood management and green infrastructure.

The Fens for the Future Strategy may be a useful reference for the design of Biodiversity Net Gain opportunities linking to wider schemes.

LP24: Natural Environment

Title:

Ms

Position:

Chartered Town Planner

First Name:

Shanna

Organisation:

Swann Edwards Architecture Limited

Surname:

Jackson

CommentNeutral

Point d) are the ‘major’ proposals set out in this policy by major by the definition or does ‘major’ refer to the likely impacts of a proposal?

Title:

Mr

Position:

First Name:

Colum

Organisation:

Cambridgeshire County Council

Surname:

Fitzsimons

CommentNeutral

The policy map identifies all statutory designated wildlife sites and Local Sites, as well as Goose and Swan Functional Land. However, the Local Plan does not identify key wildlife corridors or stepping-stones or consider connectivity of the designated sites and other notable habitats. A nature network showing these features should be produced.

Work commissioned by the Cambridgeshire and Peterborough Biodiversity Partnership (Rouquette, J., 2019) has produce initial Habitat Opportunity Maps showing existing habitats and opportunities for grassland, woodland and wetland in Cambridgeshire and Peterborough, including Fenland. These findings provide a good basis upon which to develop a strategic nature network for Fenland to help meet the requirements of NPPF paragraph 179, although additional ground-truthing and incorporation of local information would be required. Similar work has been completed within Cambridge and East Cambridgeshire (currently in draft) to create local Nature Networks, which identify priority areas for nature conservation within the local authorities.

LP24: Natural Environment

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

Comment **Support**

Comment - The contents are noted and the Commissioners and associated Boards generally support the broad principles included in this policy.

Part A: Designated Sites

c) Local Sites

Comment – It is pleasing to note that this previous request has been included. The Commissioners and associated Boards generally support the principles included in this element.

e) Habitats and Species of Principal Importance

Comment – The contents are noted and the Commissioners and associated Boards generally support the principles included in this element but only as a final course of action, used only when all else has failed.

Part B: Biodiversity and Geodiversity in development

Comment – The contents are noted and the Commissioners and associated Boards generally support the principles included in this element but take the opportunity to remind your Council of the previous comments made on River Naturalisation.

Part C: Mitigation of Potential Adverse Impacts of Development

Comment – The contents are noted and the Commissioners and associated Boards generally support the principles included in this element but only as a final course of action. Clarification is required on what compensation will be required?

Title:		Position:	
First Name:	Victoria	Organisation:	Barton Willmore
Surname:	Yeandle		

Comment **Neutral**

Metalcraft acknowledges the draft Policy.

The Ecological Report prepared in support of these representations has not identified any ecological issues that would prevent development coming forward on the site allocation subject to suitable mitigation and the necessary licences being in place.

LP24: Natural Environment

Title:		Position:	
First Name:	Kirsty	Organisation:	
Surname:	Patterson		
Comment	Support		
I agree with the policies on the Natural Environment, but think that the policy could be stronger in places.			

Title:		Position:	
First Name:	Susie	Organisation:	St John’s College Cambridge
Surname:	Wood		
Comment	Support		
Support for the inclusion of the Nene Washes and Ouse Washes ‘Goose & Swan Impact Risk Zone’ in the Local Plan within which a project-level Habitats Regulations Assessment (HRA) will be required so that it is clear where a HRA is required. Also support for the requirement for a net gain in biodiversity but without including the size of gain required in the policy wording, so that the requirement can reflect national requirements at the time.			

Title:		Position:	
First Name:		Organisation:	Barratt and David Wilson Homes Cambri
Surname:			
Comment	Support		
No objection is raised to policy LP24 and the need for a HRA to be undertaken on appropriate sites within the Goose and Swan Functional Land IRZ.			

Title:		Position:	
First Name:	Lawrence	Organisation:	Friends of Wenny Road Meadow
Surname:	Weetman		
Comment	Support		
Support, with suggestions for improvement:			
The Friends of Wenny Road Meadow think that LP24, about Nature, is about right.			
The policy should be improved by including a specific requirement for the protection and recovery of local and national Biodiversity Action Plan (BAP) Priority Species in “Part B” of LP24.			
The policy should be improved by including a commitment to engage with the Cambridgeshire & Peterborough Biodiversity Action process in the initial bullet points of LP24, as well as a commitment to work with partners to identify, designate, and protect more Local Wildlife Sites and County Wildlife Sites within Fenland.			

LP24: Natural Environment

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

Comment	Object
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LP24 seeks to ensure that the Fenland’s natural environment is protected from development and supported in general. LSbp is supportive of the wording of this policy, however, we wish the Council to better define Part C: Mitigation of Potential Impacts of Development.

According to part C, ‘Development should avoid adverse impact on existing biodiversity and geodiversity features as a first principle. Where adverse impacts are unavoidable, they must be adequately and proportionately mitigated. If full mitigation cannot be provided, compensation will be required as a last resort where there is no alternative’.

- When assessing “adequate and proportionality mitigated”, the Council should consider to what extent the impact on biodiversity and geodiversity can be mitigated against and whether this outweighs the benefits of a renewable energy project in line with paragraph 158 of the NPPF
 - The Council should set a mechanism to determine the level of compensation required in relation to damage on biodiversity and natural capital to ensure that such compensation is proportionate and reasonable
-

LP24: Natural Environment

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

Comment **Support**

Designated sites

Natural England welcomes recognition of the need to protect and enhance designated sites and wider biodiversity and requirements for development to apply the ecological mitigation hierarchy. We support recognition of the hierarchy of international^{3*}, nationally and locally designated sites⁴⁺ and the presence in Fenland of the Nene Washes Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site and the Ouse Washes SPA, SAC and Ramsar site in addition to several SSSIs and locally designated wildlife. Should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.

Goose and swan functional land

We generally welcome the inclusion of this section and requirements to consider the effects of development on Nene Washes Special Protection Area (SPA) and Ouse Washes SPA functionally linked land. The supporting text and Figure 2 should recognise Natural England's Goose & Swan IRZ as an indicative zone of land that is potentially functionally linked to sites designated for birds, based on survey data including a British Trust for Ornithology (BTO) research project. The term functionally linked land (FLL) is used to describe an undesignated area lying beyond the boundary of a protected site, which is nevertheless used by the designated bird populations associated with the site. Such areas typically provide habitat for foraging or other ecological functions essential to the maintenance of the designated population.

With regard to the Nene Washes and Ouse Washes SPAs, FLL is particularly important for Bewick's and whooper swans. We welcome that the HRA includes detailed consideration of the effects of Plan policies on FLL.

As indicated above, FLL should ideally be embedded in the ecological enhancement opportunity mapping evidence for the Local Plan. Protected cores of FLL, surrounded by a buffer area, would safeguard this area for SPA birds and ensure that this does not conflict with housing and employment allocations.

Habitats and species of principle importance

Natural England generally supports the policy requirements to protect habitats and species of principle importance; however, the Plan should take a more strategic approach to protecting and enhancing the wider ecological network to create a coherent system of natural habitats organised across whole landscapes so as to maintain ecological functions, particularly through habitat connectivity. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF.

The policy could usefully direct developers towards Natural England's Standing advice for protected species.

LP24: Natural Environment

The policy should also include a commitment to work with developers and Natural England to identify a strategic approach to great crested newt mitigation, where this is required, on major sites and other areas of key significance for this species.

Biodiversity and geodiversity in development

The Plan recognises the increasing value put on nature recovery at a government and local level, endorsed by support for the aspirations of Natural Cambridgeshire and the CPCA, including ambitions to 'double nature'. However, it should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity through all relevant development including housing, transport and community infrastructure.

As indicated above, we advise the Council to prepare a map of the existing ecological network including designated sites, priority habitats and other important green spaces to identify key areas for protection and delivery of strategic / landscape-scale enhancements. Mapped information already exists through the Cambridgeshire and Peterborough Biodiversity Group habitat opportunity mapping project. This 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 will help the Council to make a significant contribution towards the Combined Authority's Doubling Nature Vision.

No net loss of biodiversity, alone, is unlikely to make any significant contribution to Doubling Nature, hence the requirement for BNG. General policy wording to retain and enhance habitats and provide net gain, where possible, are concerning and unlikely to deliver significant enhancements and contribute towards GI enhancement and nature recovery. Policies need to identify geographically specific, quantitative and qualitative requirements for delivering and managing environmental enhancements in perpetuity. These should be identified on an ecological opportunities map and detailed in a GI Strategy, or ideally a Biodiversity SPD.

The 25 Year Environment Plan endorses principles espoused by Professor Lawton for building a nature recovery network. While it does not offer additional protections to designated sites it calls for an ecological network operating across the landscape as a whole and not in isolation. This approach is especially pertinent to designated areas – complementing the suite of protections that already exist. This means creating corridors and stepping stones between areas of high wildlife value, introducing buffer zones to protect these areas – in short – bigger, better and more joined up.

The LNRS offers an opportunity to identify and prioritise these opportunities for habitat recovery in order to strategically deliver mandatory BNG in keeping with the spirit of the Act.

The policy should seek to safeguard the value of previously developed land where it is of significant importance for biodiversity and/or geodiversity.

In paragraph 20:18 the plans commitment to ensure no net loss and net gain in the 'majority' of cases does not reflect the mandatory expectation placed on the developer and the LPA to deliver on nature recovery. While these questions should be considered early in the process there is a clear roadmap for baseline assessment and delivery of BNG. This will include the preparation of a management and maintenance plan. Whilst adverse impacts on designated sites are to be avoided the LPA will need to have regard to the LNRS for all sites put forward.

Referrals to the biodiversity checklist and the LNP toolkit are helpful for developers in guiding design especially at a pre-application consultation stage but signposting to the incoming metric being issued later this year is paramount. The metric offers a consistent approach to developers, LPAs and communities. It will evaluate potential development sites and advise on BNG requirements. Operating on a mitigation hierarchy, it will direct investment through attributing additional biodiversity unit value to habitat opportunity areas local to the proposed development and also to habitats identified as strategically important to a local area through local biodiversity action plans, green infrastructure strategies and the LNRS. This will act as a financial incentive to developers to invest strategically and

LP24: Natural Environment

locally and It is therefore in the interest of the LPA to identify local areas for BNG.

We would advocate reference to biodiversity net gain to differentiate it from incoming marine net gain and environmental net gain.

3* The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites

4+ International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites4. National sites include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites include wildlife Sites or geological sites (a variety of terms are in use for local sites).

Title:	Mr	Position:	
First Name:	Colum	Organisation:	Cambridgeshire County Council
Surname:	Fitzsimons		
Comment	Support		
We support the inclusion of LP24. We suggest that LP24(e) be expanded to include local Biodiversity Action Plan habitats / species (e.g., drainage ditches)			
We welcome the requirement for surveys for protected species / habitats within Part B. We recommend this be expanded to also include irreplaceable habitats and priority species / habitats (e.g., reword as protected and priority species and/ habitats and irreplaceable habitats). This would help to address previous issues caused by developers providing inadequate evidence to demonstrate impact to priority habitats (e.g., wood-pasture and parkland).			
There have been a few mineral / waste developments that have not considered the importance of the fens for key species. We therefore suggest that surveys are required for drainage ditches which are likely to support notable species/ assemblages, such as aquatic plants and invertebrate.			

LP25: Biodiversity Net Gain

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

Metalcraft is committed to 10% biodiversity net gain in line with the draft Policy and also the Environment Act, whose transition period will be over by the time any application is submitted.

The Indicative Masterplan and Vision Document seeks to provide the 10% mitigation onsite in line with the mitigation hierarchy. Metalcraft will continue to work with stakeholders on how the 10% biodiversity net gain will be provided on the draft allocation going forward.

The Ecology Report includes consideration of BNG and concludes that for river/culverts and linear habitats through the retention of existing features wherever possible and the inclusion of new features 10% net gain on site will be possible. For area habitats the Site comprises of arable fields, which is a low scoring habitat within the DEFRA Metric (Currently V.3.1). There is scope to tailor the planting within the proposals to avoid or minimise loss onsite. If it is not possible to achieve +10% then off-setting biodiversity units can be purchased within the district.

Title:		Position:	
First Name:	Patricia	Organisation:	
Surname:	Brooks		
Comment	Support		
This policy is welcome and should be implemented without any reservation. It would however be impossible to achieve the 10% net gain on Wenny Meadow site if council decides only to save a third of the site from development. To quote this policy loss of biodiversity should be HALTED.			

Title:	Mr	Position:	
First Name:	Martin	Organisation:	Wildlife Trust for Bedfordshire, Cambrid
Surname:	Baker		
Comment	Support		
The Wildlife Trust supports the inclusion of this policy.			

LP25: Biodiversity Net Gain

Title:

Position:

First Name: Jane

Organisation:

Surname: Mason

Comment **Neutral**

As a general observation, Biodiversity offsetting was only intended to be implemented where damage to nature cannot be avoided. Today, following the failure of ‘avoidance’, the plan is then to ‘mitigate’ and ‘compensate’, thus facilitating every possible eventuality for development on local and national green sites - and even international sites designated for their nature conservation importance. No site is safe from the insatiable need for housing development.

Policy LP24 states that the Council will ‘promote the creation of an effective, functioning ecological network throughout the district, consisting of core sites, buffers, wildlife corridors and stepping stones that link to green infrastructure in adjoining local authority areas to respond to and adapt to climate change’.

The splitting in half of site 40284 (Land off Wenny Road, Chatteris) fragments the interwoven ecology of this unique site, further isolating rare and endangered insect populations, resulting in these species, as quoted in para 20.25, becoming “more prone to local extinction”. This will inevitably affect the survival of rare bat populations living at the site, who depend on insects for food. The remaining designated Local Green Space will not be sufficient to support the wealth of biodiversity currently living on site 40284, should development be permitted on the remaining half.

Surely, in a climate crisis, protection of the natural environment should be paramount? LP24 is riddled with ‘imperative reasons’, ‘significant adverse impacts’ and why the ‘need for and benefits of a development clearly outweigh’ the rights of nature.

The protection of the natural environment requires action that will actually protect; not words that justify the destruction of valuable and cherished green spaces.

Once it’s gone, it’s gone forever!

Title:

Position:

First Name: Alan

Organisation:

Surname: Bessant

Comment **Object**

We have seen a number of planning decisions for the area known as Saxon pit Whittlesey which have the potential to impact trees, flora and fauna from earthworks and pollution. We have seen the tree line and foliage around that area thinning. We are not aware of any detailed tree survey or arboricultural method statement being presented.

Furthermore, in 2003 planning was granted for restoration of part of the Saxon Pit area which would have become a green space open to residents. Works should have taken 2-5 years. Some 19 years later we still have no overall plan for completion or any guarantee of public access. The area has also been contaminated with non-conforming waste. As local residents we do not have confidence that enough has been done in our location to honour these points.

LP25: Biodiversity Net Gain

Title:	Dr	Position:	
First Name:		Organisation:	Howard Sharp & Partners LLP
Surname:	Wickham		

Comment **Neutral**

Please see attached separate sheet (copied below) suggesting amendments to Policy LP25 to ensure alignment with emerging national guidance on delivering biodiversity net gains.

Fenland Local Plan Draft 2022 - Response to Consultation on behalf of the Diocese of Ely - LP25 Biodiversity Net Gain

On behalf of our clients we make the following comments on Policy LP25 Biodiversity Net Gain. The wording at present may not meet the tests of soundness, however with amendments the policy is supportable.

Risks pre-judging emerging National Policy and guidance

Whilst it is recognised that 10% Biodiversity Gain is an emerging national requirement through the Environment Bill, it is not anticipated to be mandatory until November 2023 and even this date is not yet confirmed. It is expected that the Government will publish guidance on how net gain is to be delivered following a consultation exploring various options including a national register of sites. But ahead of this guidance it could be premature to set out details in a Local Plan policy of how 10% net gain should be achieved – the strategy could be in conflict with the emerging national guidance.

Requiring off-site contributions to be towards ‘local nature recovery strategies’ which are not yet in existence is unlikely to be an effective policy. There are already a range of ways of achieving off-site biodiversity gains, through local Wildlife Trust schemes or others such as the Environment Bank, so the policy should be reworded to allow these alternatives.

Furthermore, there should be the opportunity to provide off-site gains on other land within the same control of the applicant. The already established biodiversity metric can be used to assess whether such off-site schemes successfully achieve 10% net gain.

Suggested amendment to rationalise the Policy and ensure it is sound

The policy should be amended to state simply that developments will be expected to achieve 10% biodiversity net gain, preferably on site but if not to achieve this off-site in accordance with the latest government guidance. Off-site net gains may be achieved using other land in the control of the applicants or through contributions towards local nature recovery strategies or other appropriate schemes.

LP25: Biodiversity Net Gain

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

Comment Object

The policy is unsound as it is not consistent with national policy or effective

The requirement to follow the mitigation hierarchy with regard to net gain is not disputed but the Council's assertion that there will be few instances where developers will be able to invest in in the Government's biodiversity credit scheme is not warranted. This makes an unnecessary judgement within the policy as to the number of schemes that will be able to invest in national credits. Without an assessment as to the ability of each site to viably deliver the 10% BNG on site or elsewhere in Fenland the Council cannot know how prevalent the need for national credits may be. This is an allowable solution and if schemes cannot address their needs on site or through local mitigation must be allowed and to suggest its use should be limited is unnecessary and could lead to unnecessary delays to decision making. The policy should be amended accordingly.

The final sentence of LP25 should be removed as it is not necessary. The opening paragraph clearly sets out the 10% is a minimum with the Government confirming that it is for the developer to decide whether it wants to go beyond that figure. If the Council is willing to support some developers to go beyond 10% then it would be more appropriate to set this out in the supporting text.

Recommendation

The council should:

- Delete "In a very few instances" and replace with "Where it is not feasible or viable to mitigate the impacts using these methods ..."
 - Delete the final paragraph of LP25
-

LP25: Biodiversity Net Gain

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

Comment Object

Contrary to paragraph 31 of the Viability Note (May 2022) in our experience achieving biodiversity net gain on site can be complex and difficult to achieve. It is certainly not as simple as changing the landscaping schemes and the requirement does vary significantly from site-to-site depending upon the biodiversity baseline.

This particularly applies to allocated previously undeveloped sites where achieving the desired allocation threshold (i.e. the amount of housing) can be very difficult to achieve without having an off-site solution.

The Council should consider either or both of: 1) establishing an off-site receptor site with the District perhaps as an extension to an existing natural asset within the District; and/or 2) reducing the allocations by 5% (of the proposed housing) to ensure that the size of the allocation meets what is achievable. The latter approach would require additional housing sites to be identified.

We would suggest that the Council discusses this matter with adjoining authorities which are already applying the 10% net gain requirement – i.e. Huntingdonshire and South Cambridgeshire District Council’s to establish their findings. Given the absence of a substantial amount of previously developed land within the District achieving net gain will be challenging.

The Council will also need to pay close attention to the Environment Act. The Act will, amongst other things, require at least a 10% net gain for qualifying developments from November 2023; allow for a levy to be paid to the Council to forego the requirement; and will also impose a deemed planning condition requiring net gain on all qualifying developments.

At present this draft policy is not justified or effective as the evidence base which suggests that net gain will be easy to achieve is flawed. It is also very unlikely to be consistent with national policy assuming that the Environment Act’s requirements from November 2023 are not altered.

LP25: Biodiversity Net Gain

Title:		Position:	Group Planning Associate
First Name:	Natasha	Organisation:	The Planning Bureau Limited
Surname:	Styles		

Comment Object

McCarthy Stone is the leading provider of specialist housing for older people for sale. Please find below our comments on the Draft Local Plan which specifically addresses the need for specialist housing for older people.

LP25: Biodiversity Net Gain

Policy LP25 uses a mitigation hierarchy approach to deliver biodiversity net gain with on site being the preference followed by net gains to be made via 'a local nature recovery strategy that the council will develop' with the policy suggesting that investment in the government's biodiversity credit scheme should be used in very few instances. The assertion that the governments scheme should be used in very few instances is not effective or justified as the council have not yet developed their local nature recovery strategy scheme and therefore the policy cannot assume that there will be few instances when proposed developments will need to invest in the governments biodiversity credit scheme. The policy is also inconsistent with para 20.29 of the plan that does not make the same assertion.

Policy CP25 para 2, last sentence, should therefore be amended as follows:

Remove: 'In a very few instances, d'

To: 'Developers will also be able to invest in the government's biodiversity credits for habitat enhancement.'

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

Comment Neutral

Policy LP25 Biodiversity Net Gain, p.92

In line with probable regulation and guidance, RSPB strongly suggests the first paragraph is amended to say that 10% Net gain must be provided, not should.

In the final paragraph, please include reference to the OxCamArc Arc Leaders Group (which I believe Fenland DC support) Environmental Principles which outline an ambition to deliver 20% BNG - which gives some justification for asking for more than 10% when circumstances allow.

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

Comment Object

Additional building, especially in the centre of rural villages, causes the amount of wildlife to decrease and in some areas, to disappear completely. It should be part of each planning application that an amount of green space, or wildlife habitat is factored into each application. Bat boxes, owl boxes etc do not cut it - just tick a box.

LP25: Biodiversity Net Gain

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

Comment Object

We object to the limited scale of allocations in Whittlesey and the settlements of Eastrea and Coates. The allocations are based on the extant planning permissions and a minimal number of allocations. The growth target for a settlement is based on the sum of commitments and allocations and is not based on an assessment of need. As such, the growth target represents a lower level of growth than that identified in evidence supporting the Whittlesey Neighbourhood Plan, which covers all the settlements in the Whittlesey Neighbourhood Plan designated area, including Eastrea and Coates. The Neighbourhood Plan is currently undergoing examination and is expected to become part of the Development Plan before the Local Plan is adopted.

We object to the exclusion of our client's land from the list of allocations in Eastrea (SHELAA site reference 40477). The analysis of sites appears to be flawed in the site assessment, resulting in an inaccurate conclusion of the site.

The Draft Local Plan – Sites Evidence Report (part D) rejects the site because:

- Development would erode an important gap between Whittlesey and Eastrea
- Development would be “relatively distant from some services”
- Eastrea is a small settlement.

The claim the site occupies an important gap between Whittlesey and Eastrea is difficult to support.

The Local Plan is not supported by an assessment of important gaps and fails to include criteria to help define an important gap. The Whittlesey Neighbourhood Plan, however, does include a proposed “Green Buffer” between the settlements, as shown on the extract below. We note the “Green Buffer” promoted in the Neighbourhood Plan does not extend as far as Eastrea, either to the north or south of Eastrea Road and much of site 40477 is excluded from the Green Buffer. The eastern edge of the Green Buffer follows a straight line, not marked on the ground, and would be difficult to identify on site. A more appropriate line would be the flood plain, which although not following a hedge or ditch line, can be plotted against the flood maps for planning. The Neighbourhood Plan is undergoing the Examination Process and is expected to be “Made” whilst the Local Plan is still in preparation.

This Neighbourhood Plan includes the only meaningful definition of a Green Buffer or Important Gap and excludes large parts of site 40477 whereas the Local Plan makes no effort to define the “Important Gap” either in policy or on a map base. There is, therefore, opportunity to allocate the land outside the Neighbourhood Plan's “Green Buffer” and, potentially, to consider a review of the eastern boundary of the buffer to deliver a larger quantum of development in a sustainable location.

As noted in the Strategic Housing and Employment Land Availability Assessment (SHELAA), the site is bound by existing development in Eastrea to the east and faces development on the other side of Eastrea Road to the south. Development would round off the built form of Eastrea and have a minimal impact on the wider rural setting of the area.

(Extract from Submitted draft Neighbourhood Plan)

The SHELAA also states the site is Agricultural Land Value Grade 2, but, as the vast majority of the otherwise potentially suitable land in the surrounding area is also Best and Most Versatile land, and the site is proportionately small, the value of the land should not be a constraint to development.

The site is also within a Minerals Safeguarding Area for sand and gravel extraction. Major developments to the south of the site, including application F/YR/21/0654/F for 203 dwellings, have had to address this issue and we note the Minerals and Waste team at Cambridgeshire County Council made the following comments on that application.

“I have reviewed the MSA and note that it covers this application area and the adjacent land to which planning application relates. We agree that, in this instance, owing to the depth and quality of the sand and gravel and the

LP25: Biodiversity Net Gain

constraints presented by proximity to the public highway and other land uses it would not be economically viable to extract the sand and gravel as a stand-alone operation.”

The proximity of the sites would suggest the quality and depth of resources may be similarly unattractive to commercial extraction, and the proximity of roads and existing housing would also limit the potential to extract minerals immediately adjacent to Eastrea. The fact the site is in a Minerals Safeguarding area should not count against consideration of the site for residential development.

The fact Eastrea is classified as a small village also needs unpicking. Eastrea lies a relatively short distance from Whittlesey; one of the larger settlements in Fenland. Indeed, the development of the 203 houses discussed above and a new supermarket will serve to bring the two settlements closer together. Coates, a large village, lies immediately to the east of Eastrea. As such, Eastrea is part of a network of settlements. It is not a freestanding small settlement and considering it as such is not entirely helpful, especially as the settlements of Eastrea, Coates and Whittlesey are all within the Whittlesey Town Council area, which in turn is used as the basis for the emerging Neighbourhood Plan. Development proposals should be considered in the context of the larger settlements in the vicinity.

Eastrea also provides a number of services, including a pub and village hall, and offers employment opportunities at a care home, motor repairs business and A B Texel, in addition to the other opportunities provided in Coates and Whittlesey. A new supermarket is also being built to the west of A B Texel, so residents of a new development would have good access to a range of services in the immediate area, including access to public transport.

Our client’s land offers the opportunity to provide development in Eastrea (an integral part of a closely linked group of settlements including Whittlesey and Coates) in an area outside the “Green Buffer” promoted in the emerging Neighbourhood Plan. (We also note the boundary of the Green Buffer is a straight line unrelated to features on the ground and could be varied to allow for an appropriate scale of development potentially following the boundary of the Flood Plain, as identified on the “Flood Plans for Planning” prepared by the government and as referenced above.) The Green Buffer will continue to provide the gap between Whittlesey and Eastrea, even after development of an allocation on our client’s land. The site could also be defined to avoid the area of Flood Risk. The development of the new supermarket to the west of the site, and the presence of a range of services and employment opportunities both in Eastrea and the neighbouring settlements, would lead to a sustainable development opportunity in a key location. We also note over 300 houses are allocated at Coates (sites 40265 and 40328) despite being further from the services of Whittlesey and having less favourable assessments in the SHELAA than site 40477 at Eastrea.

The assessment of the site should be reviewed in light of:

- comments arising from adjacent developments, specifically with regard to minerals,
 - the emerging Whittlesey Neighbourhood Plan, including the assessment of the need for housing and the designation of a green buffer between Whittlesey and Eastrea, and
 - the impact of new development, including the construction of a supermarket, a short distance to the west of the site
- All these factors would show the site in a more favourable light.

We welcome any opportunity to discuss the potential for development in this location.

Title:	Mr	Position:	Planning Officer
First Name:	Graham	Organisation:	Middle Level Commissioners
Surname:	Moore		
Comment	Support		
Comment – The Commissioners and associated Boards note and applaud the inclusion of this policy.			

LP25: Biodiversity Net Gain

Title:

Position:

First Name: Kirsty

Organisation:

Surname: Patterson

Comment **Support**

I agree with the policies on Biodiversity Net Gain, but think that the policy could be stronger in places.

Title:

Position:

First Name: Paul and Belinda

Organisation:

Surname: Clark

Comment **Object**

Contrary to paragraph 31 of the Viability Note (May 2022) in our experience achieving biodiversity net gain on site can be complex and difficult to achieve. It is certainly not as simple as changing the landscaping schemes and the requirement does vary significantly from site-to-site depending upon the biodiversity baseline.

This particularly applies to allocated previously undeveloped sites where achieving the desired allocation threshold (i.e. the amount of housing) can be very difficult to achieve without having an off-site solution.

The Council should consider either or both of: 1) establishing an off-site receptor site with the District perhaps as an extension to an existing natural asset within the District; and/or 2) reducing the allocations by 5% (of the proposed housing) to ensure that the size of the allocation meets what is achievable. The latter approach would require additional housing sites to be identified.

We would suggest that the Council discusses this matter with adjoining authorities which are already applying the 10% net gain requirement – i.e. Huntingdonshire and South Cambridgeshire District Council's to establish their findings. Given the absence of a substantial amount of previously developed land within the District achieving net gain will be challenging.

The Council will also need to pay close attention to the Environment Act. The Act will, amongst other things, require at least a 10% net gain for qualifying developments from November 2023; allow for a levy to be paid to the Council to forego the requirement; and will also impose a deemed planning condition requiring net gain on all qualifying development.

At present this draft policy is not justified or effective as the evidence base which suggests that net gain will be easy to achieve is flawed. It is also very unlikely to be consistent with national policy assuming that the Environment Act's requirements from November 2023 are not altered.

LP25: Biodiversity Net Gain

Title:

First Name:

Surname:

Carole and Susan

Fisher

Position:

Organisation:

Comment

Object

Contrary to paragraph 31 of the Viability Note (May 2022) in our experience achieving biodiversity net gain on site can be complex and difficult to achieve. It is certainly not as simple as changing the landscaping schemes and the requirement does vary significantly from site-to-site depending upon the biodiversity baseline.

This particularly applies to allocated previously undeveloped sites where achieving the desired allocation threshold (i.e. the amount of housing) can be very difficult to achieve without having an off-site solution.

The Council should consider either or both of: 1) establishing an off-site receptor site with the District perhaps as an extension to an existing natural asset within the District; and/or 2) reducing the allocations by 5% (of the proposed housing) to ensure that the size of the allocation meets what is achievable. The latter approach would require additional housing sites to be identified.

We would suggest that the Council discusses this matter with adjoining authorities which are already applying the 10% net gain requirement – i.e. Huntingdonshire and South Cambridgeshire District Council’s to establish their findings. Given the absence of a substantial amount of previously developed land within the District achieving net gain will be challenging.

The Council will also need to pay close attention to the Environment Act. The Act will, amongst other things, require at least a 10% net gain for qualifying developments from November 2023; allow for a levy to be paid to the Council to forego the requirement; and will also impose a deemed planning condition requiring net gain on all qualifying developments.

At present this draft policy is not justified or effective as the evidence base which suggests that net gain will be easy to achieve is flawed. It is also very unlikely to be consistent with national policy assuming that the Environment Act’s requirements from November 2023 are not altered.

Title:

First Name:

Surname:

Tess

Saunders

Position:

Organisation:

Spatial Planning Advisor

Anglian Water Services Limited

Comment

Support

We support the policy approach to biodiversity net gain. Anglian Water has a voluntary biodiversity net gain (BNG) business plan commitment to deliver 10% BNG against the measured losses of habitats measured by area on all Anglian Water-owned land. It is also important to recognise that Anglian Water through landholdings and projects such as the FF:IA and the Fens Reservoir, as well as working with other bodies such as Wildlife Trusts can support the development of landscape scale BNG and linked habitats which support climate change adaptation and species resilience. Offsite BNG could align with opportunities presented by the Local Nature Recovery Strategy or Connected Fens landscape scale nature recovery promoted by Natural Cambridgeshire.

LP25: Biodiversity Net Gain

Title:

Position:

First Name: Susie

Organisation: St John's College Cambridge

Surname: Wood

Comment **Object**

Object to inclusion of the size of biodiversity net gain to be required in the policy wording, as this should reflect national requirements at the time which may be more or less than the stated 10%.

Title:

Position:

First Name:

Organisation: Barratt and David Wilson Homes Cambri

Surname:

Comment **Object**

The aspiration for Biodiversity Net Gain is supported and no objection is raised to the requirement for 10% BNG being provided as part of new developments.

The hierarchy is considered to be appropriate and the approach to encourage on site BNG on site at the top of the hierarchy is supported. From experience to date, in some instances it is not possible to provide 10% BNG on site, which can in some instances require significant land take and compete with other key objectives, such as making efficient use of land. With this in mind, it is considered that the policy wording should be reviewed particularly in the interim period whereby the local nature recovery strategies' are being developed by Fenland District Council. An amendment to the wording would avoid a policy vacuum for applications that are being considered prior to a local nature recovery strategy being in place. In the event that a local strategy has not been identified, it could result in a situation whereby applicants are not able to meet the requirements of policy LP25.

It is considered that the policy could be- re- worded to allow applicants to make a financial contribution towards a local nature recovery strategy, whilst it is being developed by the Council. Suggested amended wording is set out within italics below:

"All qualifying development proposals must consider how they can contribute to biodiversity net gain. In all cases, where viable a minimum 10% biodiversity net gain set out in a biodiversity gain plan should be provided to help species recover."

"Biodiversity net gain should follow the mitigation hierarchy and be provided on-site for most proposals in the first instance. In some circumstances off-site mitigation may be possible but opportunities to achieve net gain on-site must be fully explored to ensure that loss of biodiversity is avoided or minimised before options for off-site compensation are considered. Where not possible to provide on-site, improvements should be made to 'local nature recovery strategies' which the Council will develop with the appointed responsible authority. If a local nature recovery strategy has not been implemented, then the applicant could also make a financial contribution to off- set BNG for a future nature recovery strategies. In a very few instances, developers will be able to invest in the government's biodiversity credits for habitat enhancement."

It is considered that the above amendment is required in order for the policy to be sound in planning terms.

LP25: Biodiversity Net Gain

Title:

Position:

First Name: Lawrence

Organisation: Friends of Wenny Road Meadow

Surname: Weetman

Comment **Support**

Support, with suggestions for improvement:

The Friends of Wenny Road Meadow appreciate the inclusion of new, stronger Biodiversity Net Gain requirements, driven by the new provisions of The Environment Act 2021.

We believe that the council should be more explicit that the “avoid” step of the mitigation hierarchy will require evidence that alternative sites that could deliver an equivalent public benefit with a lower biodiversity impact have been considered.

Additionally, the draft of the new plan sets the biodiversity net gain requirement at 10%. Although the government has carried out a public consultation in the first half of 2022, the Secretary of State and Defra are yet to confirm or adopt a particular Biodiversity Net Gain target (expressed as a percentage). The Environment Act 2021 sets the Biodiversity Net Gain requirement at 10% in Schedule 7A, Part 1, Section 2(3). Section 2(4) of the act permits the Secretary of State to amend the value of the mandatory Biodiversity Net Gain target.

We believe that regardless of the level set in The Environment Act 2021, there should always be a minimum level of 10% Biodiversity Net Gain in the new local plan. We therefore believe that the new local plan should set the Biodiversity Net Gain requirement at “10%, or a level required by The Environment Act 2021, whichever is greater.”

Finally, we think that the policy on Biodiversity Net Gain should require that any “off-setting” or “off-site mitigation” to compensate for biodiversity losses should take place as close to the development site as possible. This would help avoid a situation where one part of Fenland sees significant biodiversity loss while any compensation measures benefit areas elsewhere in the district or county.

LP25: Biodiversity Net Gain

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

Comment Object

The policy states that 'Where circumstances permit biodiversity net gain above the minimum 10% will be encouraged with support given to provide this either on-site or off site in line with local nature recovery strategies in the first instance, and for national habitat enhancement if not possible to provide locally'. LSbp is supportive of the wording of this proposal in principle.

Clarification needs to be provided as to what is required within a Biodiversity Gain Plan as this is not a requirement which has been sought by other local planning authorities we have dealt with. Given there is a requirement to provide an Ecological Appraisal, a BNG Metric and a Biodiversity Management Plan (which is often conditioned upon approval) we would question the requirement for an additional plan. This seems unnecessary and is covered by other documentation and should be removed from the policy.

Paragraph 20.29 mentions that where BNG cannot be provided on-site, the improvements should be made to 'local nature recovery strategies' which the Council will help develop with the appointed responsible authority with the delivery mechanism of net gain in these areas set out potentially through a Cambridgeshire-wide mechanism'. To this end, LSbp encourages the Council to work with developers alongside the appointed responsible authority in identifying potential sites as part of their 'local natural recovery strategies' to ensure that these areas of natural interest can be supported as efficiently as possible.

LP25: Biodiversity Net Gain

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

Comment Support

Further to the above (NE response to LP24) , we support this policy for all development to deliver a minimum 10% BNG, on-site where possible, calculated using the DEFRA biodiversity metric and for delivery and maintenance for a minimum thirty-year period to be secured through planning mechanism or a conservation covenant. We would welcome efforts to match the 20% aspired to by the rest of the county to help address the deficit of natural green space and SANGS compared to the rest of Cambridgeshire.

Please note that reference in the policy and supporting text to the requirement for ‘suitable management and assessment’ should read ‘suitable management and monitoring’.

We note reference to BNG contributing to Local Nature Recovery Strategies (LNRS). This should be developed further within the policy, noting that LNRS are non-statutory, non-binding maps of biodiversity assets, opportunities for improvement and statements of intention for future biodiversity improvements within a County/Mayoral authority. They will provide an incentive for BNG offsite compensation sites, to meet the strategic objectives set out in the LNRS. They are likely to be a material consideration, both for the preparation of Development Plans and the determination of Planning Applications. The evidence gathered to produce the LNRS – national and local habitat maps, opportunity areas, will be an important evidence source for local plan preparation. The enhanced ‘biodiversity duty’ in the Environment Act, and supporting targets for biodiversity, will require local planning authorities to have greater regard to impacts on biodiversity loss in their decisions. LNRS are required to identify where improving biodiversity will address wider environmental benefits, through nature-based solutions. Likely that these will be worked up with districts and delivered through local plans.

Paragraph 20.26 is a rather confusing explanation of how BNG might work. Size is part of the metric, but the biodiversity unit value considers other elements also. Additionally, there is an expectation that habitats are not necessarily interchangeable therefore the loss of a hedge will need to be replaced like for like. Given that further clarification is imminent, and that the policy will supersede the local plan it is better to signpost the policy to avoid confusion.

In Paragraph 20.29, the sentence “Where not possible to provide on-site, the improvements should be made to ‘local nature recovery strategies’ which the council will help develop with the responsible authorities” NE notes the positive intention to work with the responsible authority. However, it would make more sense to state that “in the case of off-site delivery becoming necessary, local nature recovery strategies, which the council will develop in partnership with the responsible authority, will be used to assist in the decision making of where delivery is most strategically appropriate”.

There is a requirement in the LNRS not only to identify biodiversity priorities but also to provide strategic opportunity mapping. Any local plan is required to have a strong evidence base. In the case of the LNRS, this may require re-examining existing habitat opportunity mapping. Additionally, it will become increasingly important to map multi-functional delivery of nature-based solutions / eco-system services.

Please note again net gain should read biodiversity net gain.

Whilst Natural Cambridgeshire has identified six priority areas for nature recovery investment, one of which is in Fenland, there are financial incentives to focus investment locally. Additionally given the deficit of green space and the acknowledgement by FDC of the merits of provision within 300m of a resident’s front door opportunities should be taken wherever possible to think local. This will not only serve to remove recreational pressure from more sensitive sites but contribute to health and wellbeing by providing green space and encouraging growth by providing attractive places for people to live in.

The Plan acknowledges that the purchase of biodiversity credits is a last resort. These are likely to be for highly

LP25: Biodiversity Net Gain

distinctive habitats and will not be considered an accessible option for the most part.

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

Comment **Object**

The policy recognises that biodiversity gain may not always be provided on site, however the policy stipulates that where it is not provided on site, it should come forward through the ‘local nature recovery strategies’. Whilst nature recovery strategies are one way of improving net gain (although they are very much at the infancy at the moment with little known about them) there are other opportunities, for example, using land already owned, purchasing neighbouring land or buying credits from a Biodiversity Net Gain provider. The policy needs to be amended to be more flexible and enable other mechanisms for creating biodiversity gain to be incorporated.

Linked with this comment, the last paragraph of this policy needs to be amended and the words ‘in line with local nature recovery strategies in the first instance, and for national habitat enhancement if not possible to provide locally’ be deleted.

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

Comment **Neutral**

We are concerned that policy LP25 only seeks to deliver the mandatory 10% BNG minimum. While this is a national target identified in the Environment Act it does not reflect that Cambridgeshire is one of the most nature depleted counties in the country with only 13% of land identified as supporting semi-natural grassland, woodland, and water habitats (Roquette 2019). In fact, this figure is potentially lower for Fenland given the extent of habitat depletion and woodland cover across the district.

Local authority ecologists and the Wildlife Trust in Cambridgeshire and Peterborough consider that it is likely to require much higher value than 10% BNG to deliver meaningful improvements to biodiversity within the County. It is suggested that 20% BNG would be a more appropriate target. Local Plan Policy LP25 provides an excellent opportunity to seek 20% BNG to help meet local needs for biodiversity. This would also be in line with other local plans across the country, which seek locally determined BNG values within local policy / SPDs.

It is therefore recommended that further work is undertaken to demonstrate whether the current 10% BNG is sufficient to halt the decline of biodiversity within Fenland and deliver FDC’s commitment to supporting Natural Cambridgeshire’s vision to double nature. As part of this work, it should be considered how wider green infrastructure, such as increasing accessible greenspace, could contribute to help contribute to BNG.

Policy LP25 also provides an opportunity to shape how BNG is delivered locally. Consideration needs to be given as to the importance of BNG delivering strategically important nature conservation projects as part of development. It is suggested that a similar approach is taken to the interim BNG statement that have been produced by Greater Cambridgeshire Partnership or Peterborough City Council (unless further information from Defra on deliver of BNG is provided). In addition, it would be beneficial to produce a nature network for Fenland (as discussed above) t help identify strategic sites for BNG.

LP26: Carbon Sinks and Carbon Sequestration

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

Comment – The Commissioners and associated Boards note and applaud the inclusion of this policy.

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

Further clarity is needed within the policy as to which areas within Fenland District will be affected by carbon sinks and carbon sequestration. In the last sentence reference is made to ‘Carbon Storage and Sequestration by Habitat 2021 (NERR094) (Natural England) however this document does not detail which areas of Fenland will be impacted by this policy. Persimmon Homes would expect that this policy includes a plan which identifies the areas in question and this plan needs to be consulted on as part of the local plan review.

Persimmon Homes agree that this policy should not be applied to sites which are allocated as part of the Local Plan.

LP26: Carbon Sinks and Carbon Sequestration

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

Comment	Object
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This policy recognises the importance of the district's peat soils as a significant carbon store, in helping to improve air quality and mitigate against climate change. Natural England supports policy requirements to protect and enhance the peat soils, and the presumption in favour of preservation of peat soils and other carbon sinks in situ. We support requirements to limit carbon emissions through handling of peat soils.

The policy states that proposals to protect and enhance peat soils and create new carbon sinks will be supported; however, the Plan needs to be underpinned by ecological mapping of the opportunities for this to be delivered through the Plan.

Natural England is concerned that a number of allocations are on the remnant peat soils, particularly in March, Chatteris, Whittlesey and Wimblington. In some cases, extensive swathes of peat could potentially be disturbed, releasing carbon emissions, sterilising the peat and destroying its function as a carbon store. We understand that avoiding development on the peat is a challenge across much of Fenland; however, given the importance of the peat soils in mitigating climate change and the opportunities they provide for GI enhancement, nature recovery and natural flood management solutions, we believe allocations should avoid the peat soils as far as possible. This hasn't really been addressed through the Sites Evidence Report and SA. Ecological opportunity mapping, to underpin the Local Plan, will help to protect these areas, prioritising the peat soils for GI and nature recovery opportunities, and targeting allocations in more sustainable locations. Policy allocations on peat soils should, as a minimum, require development to be directed towards the most degraded areas to retain and enhance better quality peat soils within the on-site green infrastructure.

Policy LP26 should encourage development to contribute towards enhancement of the Fenland peat to deliver a wide range of environmental services including biodiversity, open space, flood risk and drainage benefits, in addition to helping to mitigate climate change.

The policy focuses on the importance of peat for agriculture; however, the imminent threat to the fenland (including Cambridgeshire's) peat soils due to current land management practices, identified in Defra's 25 Year Environment Plan and the UK Peatland Strategy 2018 - 2040. Food production and nature recovery do not need to be seen as mutually exclusive. Fenland finds itself at the forefront of these issues given that the peat that secures its place as a major English food producer is a finite resource facing severe pressure from climate change, population growth and twin issues of flooding and drought.

Natural England firmly believes that a healthy natural environment underpins a healthy economy. At an individual farm level, healthy soils, clean air and water, abundant pollinators and rich genetic diversity are all vital for productive cropping and livestock systems. With over 70% of our land in England being farmed, we also understand the wider public benefits that well-managed land and landscapes can bring to the 56 million people living in England. The UK Food Security Report, published in December 2021, outlined that the biggest medium- to long- term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity loss.

Fenland's position on the frontline of these issues, find themselves well placed to become world leaders in innovation, sustainability, regenerative farming, energy and new technology. This in turn has the potential to drive a new industry creating growth and employment.

We have previously advised the Council to prepare a map of the existing ecological network including designated sites, priority habitats and other important green spaces to identify key areas for protection and for delivery of strategic / landscape-scale enhancements, in accordance with NPPF paragraph 179 and the Gov's planning practice guidance on the Natural Environment <https://www.gov.uk/guidance/natural-environment>.

LP26: Carbon Sinks and Carbon Sequestration

Such a map will be one of the outputs of the Local Nature Recovery Strategy. This should form part of the evidence base for preparation of the Local Plan. In this context, it is useful to consider:

- the latest government policies that are relevant, including the commitments in the 25 Year Environment Plan; • the contents of existing up-to-date plans and strategies for biodiversity and nature recovery;
- the potential effects of a development on the habitats or species on the Natural Environment and Rural Communities Act 2006 section 41 list;
- whether an ecological survey is appropriate;
- opportunities to restore or enhance local ecological networks, including those that contribute to the wider Nature Recovery Network;
- how to secure net gains for biodiversity as part of green infrastructure provision; and
- opportunities to work strategically in order to streamline development decisions: for example, by establishing a ‘zone of influence’ around protected sites.”

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

Comment	Object
Paras 20.34 and 20.35 and Policy LP26 : Carbon Sinks and Carbon Sequestration	

We broadly welcome these paragraphs and policy relating to Carbon.

However, the policy and text should reference archaeology. To that end we suggest the addition of the following text: At the end of paragraph 20.34, we suggest adding the following sentence:
Peat deposits are also important archives of past human activities and environments, preserving unique archaeological and palaeoecological records from sequences that often formed over thousands of years.

At the end of paragraph 20.35, we suggest adding the following sentence:
However, trees are not encouraged on archaeological sites due to the impact on water levels.

Suggested Changes
At the end of paragraph 20.34, we suggest adding the following sentence:
"Peat deposits are also important archives of past human activities and environments, preserving unique archaeological and palaeoecological records from sequences that often formed over thousands of years."

At the end of paragraph 20.35, we suggest adding the following sentence:
"However, trees are not encouraged on archaeological sites due to the impact on water levels."

LP26: Carbon Sinks and Carbon Sequestration

Title: **Position:** Spatial Planning Advisor

First Name: Tess **Organisation:** Anglian Water Services Limited

Surname: Saunders

Comment **Support**

Anglian Water is supportive of nature-based carbon sequestration schemes. In our Net Zero Strategy to 2030* we plan to remove or offset our residual emissions by planting 50 hectares of woodland on Anglian Water sites, explore nature-based opportunities using wetlands, marshes and grasslands and work with landowners to develop land management schemes that avoid and remove emissions.

*See: <https://www.anglianwater.co.uk/siteassets/household/environment/net-zero-2030-strategy-2021.pdf>

Title: Mr **Position:**

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

Surname: Fitzsimons

Comment **Support**

Policy LP26 protecting existing carbon sinks such as peat soils is welcome. However, the wording should be amended as it is currently unclear what is intended by “enhancing and protecting” the carbon sink of peatland.

It is disappointing to see that under Policy LP26, as long as the land is allocated for development then harming the peat/carbon stores is permitted (albeit marginally caveated with the need to minimise the harm as far as possible).

Measuring the carbon flux, particularly for peat, is still not straightforward and there remains some debate over methodologies. Consequently, there is potentially a lot of leeway in this policy, and it does not go far enough in dissuading development of peatland sites.

Title: **Position:** Senior Conservation Officer

First Name: Daniel **Organisation:** RSPB

Surname: Pullan

Comment **Object**

Policy LP26 Carbon Sinks and Sequestration, p.92

Second paragraph, part (a) – even if a site is allocated for development, it must still avoid loss of peat soils, even if this does include removal and re-use. We would like to see this policy re-phrased to indicate that re-use of peat soils in a way that reduces carbon emissions as much as possible will be required.

Title: **Position:** Senior Conservation Officer

First Name: Daniel **Organisation:** RSPB

Surname: Pullan

Comment **Neutral**

Policy LP26 Carbon Sinks and Sequestration, p.92

Many of these land-uses and habitats will not in reality be carbon sinks (and so sequestering carbon) unless they are managed appropriately. A more accurate term would be ‘carbon stores’.

LP26: Carbon Sinks and Carbon Sequestration

Title:		Position:	
First Name:	Alan	Organisation:	
Surname:	Bessant		
Comment	Object		
We have seen a number of planning decisions for the area known as Saxon pit Whittlesey which have the potential to impact trees, flora and fauna from earthworks and pollution. We have seen the tree line and foliage around that area thinning. We are not aware of any detailed tree survey or arboricultural method statement being presented. Furthermore, in 2003 planning was granted for restoration of part of the Saxon Pit area which would have become a green space open to residents. Works should have taken 2-5 years. Some 19 years later we still have no overall plan for completion or any guarantee of public access. The area has also been contaminated with non-conforming waste. As local residents we do not have confidence that enough has been done in our location to honour these points.			

Title:		Position:	
First Name:	Patricia	Organisation:	
Surname:	Brooks		
Comment	Support		
This policy aims to retain trees and hedgerows and scrub. Losing Wenny Meadow to development directly opposes such a policy.			

Title:		Position:	
First Name:	Natalie	Organisation:	Huntingdonshire District Council
Surname:	Elworthy		
Comment	Support		
Inclusion of policy LP26 Carbon sinks and Carbon Sequestration is supported reflecting the importance of preserving areas of peat soils as carbon sinks to minimise greenhouse gas emissions. HDC would be interested in working cooperatively with Fenland DC on this issue when a new local plan is commenced for this district to promote a consistent approach to protecting the peat resources that cross from north-eastern parts of Huntingdonshire into Fenland.			

LP27: Trees and Planting

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

Comment	Object
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Paragraph 4 of Policy LP27

Persimmon Homes recognise the importance of retaining existing trees within a development for both their amenity and biodiversity value, however there are times that this is not always possible, for example to provide access. For this reason Persimmon Homes are of the view that further flexibility should be built into the wording of paragraph 4 of this policy along the lines of:-

‘Where the proposal may result in the loss of any other tree or woodland not covered by the above and will make a positive contribution to the landscape or biodiversity value of the area, where possible the proposal will expect the proposal to retain these features on its design layout as an integral part of a high quality scheme for the site. Where a loss of trees or woodlands is unavoidable the following strategy should be used:’

New Trees and Planting (LP27)

The second paragraph of this section of the policy states that ‘Planting schemes for public spaces and roadsides should include only native species that occur naturally in the locality, unless arboricultural considerations mean native species are not appropriate.

Persimmon Homes are of the view that the wording of this policy is too prescriptive. There will be times that the planting of locally occurring native species are not appropriate, for example in highway verges. For this reason, Persimmon Homes suggest the remove of the word ‘only’ as indicated above to allow for flexibility where needed.

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

Comment	Support
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We generally support this policy to protect existing trees as far as possible and to mitigate, manage and maintain any losses, subject to trees being planted in appropriate locations. Tree planting needs to be targeted in appropriate locations and considered in the context of wider plans for nature recovery. Consideration should be given to ecological impacts and the opportunities to create alternative habitats that could deliver better enhancements for people and wildlife, and store carbon effectively. Where woodland habitat creation is appropriate, consideration should be given to natural regeneration, and ‘rewilding’ for the economic and ecological benefits this can achieve. Any tree planting should use native and local provenance tree species suitable for the location.

The policy should include requirements to protect and enhance native species hedgerows and the planting of new species-rich hedgerows to enhance habitat connectivity.

LP27: Trees and Planting

Title:

Position:

First Name: Lawrence

Organisation: Friends of Wenny Road Meadow

Surname: Weetman

Comment **Support**

Support, with suggestions for improvement:

The Friends of Wenny Road Meadow think that LP27, about Trees, is headed in the right direction.

We like that the council has adopted an innovative approach to encouraging the retention of larger trees by requiring a greater number of replacement trees to be planted the greater the size of the tree being removed. We believe that the council can afford to make this multiplier larger still.

We think that policies could help encourage more mature specimens of trees being planted when replacing trees that are removed as part of development. Although this represents an additional cost, it would increase the likelihood of a tree enduring to maturity and will lower ongoing maintenance costs. For example, the policy could require a mature tree (e.g. over a certain height) depending upon the diameter of the removed tree. An alternative method used by some local authorities is to require that the level of “canopy cover” (area covered by the breadth of the tree) is at least maintained.

Decaying trees are important habitats for many species, particularly invertebrates. The policy should encourage the retention of decaying trees where these are not dangerous, and should require the retention of decaying trees where the tree forms part of a group. Where retention of decaying trees is not possible, the policy should require as much of the tree to be kept in-situ as possible, or incorporated into landscape features on the site (for example, as a log pile for invertebrates and reptiles).

The policy should also be explicit that planning conditions should seek the retention of any replacement trees.

The council should also include an explicit policy of adding Tree Protection Orders to any trees that are retained during a development, to avoid them being removed at a later stage (for example by new residents/occupants).

The council should include a policy regarding how close development can be to existing ancient or veteran trees. There have been many cases where local authorities have been threatened with legal action from home insurers due to damage allegedly caused by retained trees. In some cases, such as that of the 600-year-old “Bretton Oak” in Peterborough, these claims can run into hundreds of thousands of pounds. There can also be calls for the removal of the ancient trees in question. This can be expensive for the local authority. Removing the “Bretton Oak” cost the council in the region of £50,000, with the loss of the tree deeply harmful to the local community and to local ecology.

Standing Advice published by Natural England and The Forestry Commission says authorities should introduce “buffer zones” between developments and ancient woodlands or ancient/veteran trees. It says: “For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic. For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. This will create a minimum root protection area.” The council may wish to adopt an even more cautious buffer policy than this, given the risk to both the future of each retained tree and of future claims against the council.

The policy says that “opportunities for new tree planting should be explored as part of all development proposals”. Given that Fenland is the third-worst district in England for tree deprivation, we think that the policy should go much further in this regard. For example, we think that the policy should at least require “major developments” (10 or more dwellings or 10,000m/sq) - if not all developments - to have a minimum number of new trees. This could be set at a level such as 3 trees per dwelling, or 1 tree per 50m/sq of industrial/retail space. This is the level set by Sefton Council

LP27: Trees and Planting

in a previous adopted Local Plan (via an SPD), so is not overburdensome nor without precedent. The council could make this policy less strict for brownfield sites in order to encourage brownfield regeneration and recognise that brownfield sites may not have as much space available for new trees. Another innovative approach could be for the number of trees to be linked to the number of parking spaces provided by any residential, retail, or industrial development. This would also help with carbon sequestration, directly mitigating some of the climate impacts of the increased car journeys associated with the development. This could be set at a level such as one tree for every three residential parking spaces provided and one tree for every five industrial or retail parking spaces provided. In the case of Sefton Council’s previous plan (via an SPD), the plan required non-residential developments to provide at least one tree per parking space or one tree per 50m/sq of development, whichever is the greater. If this policy is only applied to major developments, the plan should encourage these standards for all developments.

We welcome that the policy notes that the council may require a developer to contribute towards ongoing maintenance and management of new trees. All too often trees are planted as saplings and then forgotten about, rarely thriving and often never growing at all. We think the policy should be more clear that developer contributions towards the maintenance of new trees will be ring-fenced, should be assessed separately from any other proposed developer contributions, and should certainly not be fighting for funds from the same “pot” as other services funded by developer contributions.

Sefton Council’s SPD is attached as FoWRM-03.

The Natural England & Forestry Commission standing guidance on buffer zones around ancient and veteran trees is published here:
<https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort>

Title:		Position:	
First Name:	Kirsty	Organisation:	
Surname:	Patterson		
Comment	Support		
I agree with the policies on Trees, but think that the policy could be stronger in places.			

Fenland should identify sites for new forests, especially given the likely new reservoir and the lack of tree cover within Fenland. This would help Fenland contribute to combating climate change and would improve nature and biodiversity.

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

The Vision Document and Indicative Masterplan demonstrate the increase in tree planting on the proposed allocation. Metalcraft acknowledges that the increased tree planting will contribute towards biodiversity net gain provision and improve the wider area. This includes strategic tree planting to mitigate the impact of the development on the wider area.

LP27: Trees and Planting

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

Policy LP27 Trees and Planting, p.95

‘Mitigating for Loss of Trees and Woodland’ - It is unclear where this policy approach is coming from. Although a larger number of new trees may mitigate the carbon storage and sequestering potential of a single large tree, their biodiversity value will in no way replace that of a mature or veteran individual. It could be argued the same with regards to landscape value. This policy needs to be better integrated into those for Biodiversity Net Gain and Natural Environment policies, so that the mitigation hierarchy is followed, and in in terms of enhancement through BNG, the most appropriate habitats are provided on site which may or may not include trees.

Title:		Position:	
First Name:	Alan	Organisation:	
Surname:	Bessant		
Comment	Object		

We have seen a number of planning decisions for the area known as Saxon pit Whittlesey which have the potential to impact trees, flora and fauna from earthworks and pollution. We have seen the tree line and foliage around that area thinning. We are not aware of any detailed tree survey or arboricultural method statement being presented. Furthermore, in 2003 planning was granted for restoration of part of the Saxon Pit area which would have become a green space open to residents. Works should have taken 2-5 years. Some 19 years later we still have no overall plan for completion or any guarantee of public access. The area has also been contaminated with non-conforming waste. As local residents we do not have confidence that enough has been done in our location to honour these points.

LP28: Landscape

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

Comment **Support**

Natural England welcomes this policy to protect the Fenland Landscape Character Areas (LCAs), visual amenity and the tranquil nature and nocturnal character of the rural area, free from light pollution. We would strongly encourage recognition of the application for a UNESCO Fens Biosphere designation as a key opportunity to achieve these objectives.

We support requirements within the site allocation policies for appropriate landscaping, boundary treatments and planting to reduce visual impacts on the landscape.

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

Comment **Neutral**

Due to the size and scale of commercial solar parks, they may have an impact on their surrounding landscape. LSbp would like the Council to give due consideration to the mitigation of landscape impacts, acknowledging that in some instances this can take time to establish. The development should not be judged on its visual impact solely on its first year of development, but rather after a significant amount of time that has allowed for the full germination of planting and landscape management regimes.

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

Comment **Support**

Paras 20.47 – 20.49 Policy LP28 Landscape

We welcome these paragraphs and policy in relation to landscape and landscape character.

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

Comment **Object**

We would welcome clarification regarding the policy approach and opportunities for renewable energy projects that are conferred by Policy LP6. It would be helpful to ascertain how renewable energy projects will be assessed in landscape terms and the assessment framework used to determine the site allocations for large scale onshore wind.

Furthermore, there does not appear to be a Landscape Character Assessment to inform future development in the district, including landscape capacity for renewable energy.

LP28: Landscape

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

The Vision Document that accompanies these representations has carefully considered the landscape setting and features of the proposed allocation site. One of the key Design Concepts as set out in the document is ‘Responding to the Landscape’ which identifies how the development of this site could respond positively to the identified features through:

- Utilising the 20 foot drain as a green corridor through the site
 - Maintaining existing trees and hedgerows wherever possible
 - Including buffer planning along the southern boundary as part of the gateway approach and to help mitigate noise
 - Retaining and enhancing the existing hedgerow on the western boundary to mitigate views and integrate building son the wider landscape
-

LP29: Green Infrastructure

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

Comment **Support**

Comment – It is pleasing to note that this previous request has been included. The Commissioners and associated Boards generally support the principles included in this element.

LP29: Green Infrastructure

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

Comment Object

Natural England supports recognition of green infrastructure as ‘natural capital’ that can deliver a wide range of ecosystem services including health and recreational benefits, allowing people to enjoy the countryside, drainage and flood risk management, urban cooling to support climate change mitigation, food production, wildlife habitats.

The policy states that the Council will work in partnership to maintain and improve the existing green infrastructure network in Fenland 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 Council will take into account any appropriate local evidence to guide applicants on what new green infrastructure will be required and how it should be delivered. Natural England supports this approach but advocates the early preparation of a Green Infrastructure Strategy, informed through ecological opportunity mapping, as a framework for the Local Plan. Site allocation policies should set requirements for development to implement the delivery of the GI network. This strategic approach is advocated in paragraph 175 of the NPPF.

Opportunities to protect and enhance the Fenland peat soils should be included in GI considerations and the preparation of a GI Strategy.

The policy should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 92 of the NPPF. Natural England’s Cambridgeshire Accessible Greenspace Analysis (2010) may be of use when considering current level of provision whilst our Accessible Natural Greenspace Standard (ANGSt) offers useful guidance to developers.

Provision of sufficient quantity of high quality alternative natural greenspace is an important tool in mitigating the effects on recreational pressure associated with new housing development on more sensitive SSSIs. Our advice is that the level of provision should be proportionate to the scale of development, for example 8ha /1000 population is advocated through the Suitable Alternative Natural Green Space (SANGS) guidance.

It would be helpful to reference the work of the Cambridgeshire GI strategy. For example that the council will support the Cambridgeshire Green Infrastructure Strategy (CGIS) via the delivery of local green infrastructure interventions which contribute at a landscape scale and across LPA boundaries.

This CGIS highlights shortfalls which need to be addressed particularly in the face of proposed growth in Cambridgeshire. New developments have the potential to reinforce, link and buffer and create new GI through the strategic application of BNG. Additionally growing this GI network has the power to increase people’s connection with nature and the attendant health and wellbeing benefits this represents. It also complements a growth and employment agenda where ease of access between urban and non-urban areas contributes to placemaking and supports the growth of tourism.

Given the recognised lack of accessible informal green space across Fenland means that the Council should actively use the mechanisms at its disposal to promote growth of this resource. The policy should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraphs 92 and 175 of the NPPF. Such provision will attract people to the area and contribute to the growth agenda.

Additionally, there is an expectation that people need, and should have, access to green space within 300m of their doorsteps.

LP29: Green Infrastructure

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

Comment **Support**

The policy seeks to ensure that green infrastructure in the district will be enhanced by new development, specifically addressing the need for stakeholders to work together to achieve this goal. LSbp supports this policy in general and welcomes the opportunity to work with developers in promoting Fenland's green infrastructure.

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

Comment **Support**

Support, with suggestions for improvement:

The Friends of Wenny Road Meadow group think that the policies on Green Infrastructure should include explicit reference to the protection of Natural Green Space. In particular, Fenland has a relatively low number of semi-improved and unimproved grasslands due to the nature and extent of intensive farming in this area. Spaces such as this should be retained where possible.

Title:		Position:	
First Name:	Kirsty	Organisation:	
Surname:	Patterson		

Comment **Support**

Development of land containing peat soils should not be permitted.

New forests should be planned for as a means of additional carbon sequestration.

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

Comment **Support**

We welcome the inclusion of Local Policy LP29's Part D: Designated Nature Sites – Mitigation of Recreational Impacts of Development which states that "development may be required to provide open space" where there is a potential for the development to have a significant adverse effect on the integrity of a wildlife site. However, the Local Plan does not demonstrate how this is likely to be adequate to address adverse impacts, nor does it address existing pressure on wildlife sites.

LP29: Green Infrastructure

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

We strongly support the inclusion of Policy LP29: Green Infrastructure, and particularly note the inclusion of ‘blue infrastructure’ within this definition. The text acknowledges the importance of both individual linear features and the wider strategic green infrastructure network. We consider that the requirement for green infrastructure provision within major development proposals should be strengthened to ensure it is always provided. This is a key opportunity to provide climate change adaptation and mitigation that must be seized, as appropriate green infrastructure can reduce the long-term implications of a development on flood risk, coastal change, water supply, biodiversity and landscapes.

The PPG confirms that there is a statutory duty on LPAs to include policies in their Local Plans designed to tackle climate change and its impacts. The Environment Agency’s Climate Ambition is to create a net zero nation that is resilient to climate change. Adequate provision of green infrastructure is a nature-based solution whereby local environments can become more resilient to climate impacts such as flooding, drought and overheating, and absorb and store greater quantities of carbon.

In addition to LP29, green infrastructure should also be referenced within LP5: Health and Wellbeing, LP7: Design, and LP32: Flood and Water Management, and within the ‘Land Use and Wildlife’ Sustainability Objective.

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

Comment **Neutral**

Policy LP29 Green Infrastructure & Para’s 2052-20.58 p.98

Please include reference to the NHBC guide on ‘Biodiversity in New Housing Developments’ as a yardstick for how green infrastructure can be integrated into developments. https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf

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

Comment **Support**

This policy is to be supported and applied to earlier policies.

LP29: Green Infrastructure

Title:

Position:

First Name: Lynda

Organisation:

Surname: Warth

Comment

Support

'Policy LP29: Green Infrastructure

Working in partnership with conservation and environmental organisations, local communities, landowners, developers and statutory agencies, the Council will seek to maintain and improve the existing green infrastructure network in Fenland. This will be achieved 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 Council will take into account any appropriate local evidence to guide applicants on what new green infrastructure will be required and how it should be delivered.

All development proposals should ensure that existing and new green infrastructure is considered and integrated into the scheme's design from the outset. Where new green infrastructure is proposed, the design should maximise the delivery of ecosystem services and support healthy and active lifestyles, including, for example, by joining to existing areas of green infrastructure.

Strategic and major development proposals should incorporate opportunities for green infrastructure provision within the site to reverse the decline in biodiversity and restore ecological networks at a landscape scale, reverse habitat fragmentation and increase connectivity of habitats, and preserve, restore and create priority and other habitats within and adjacent to new developments.

Proposals will be expected to provide clear arrangements for the long-term maintenance and management and/or enhancement of green infrastructure assets. Where appropriate, the Council may utilise planning conditions, planning obligations or unilateral undertakings to deliver green infrastructure projects.

Development must protect the existing linear features of the green infrastructure network that provide connectivity between green infrastructure assets, including public rights of way, bridleways, cycleways and waterways, and take opportunities to improve such features including for example by providing 'stepping stones' for nature.

Development proposals that cause loss or harm to the green infrastructure network will not be permitted, unless the need for and benefits of the development demonstrably outweigh any adverse impacts. Where adverse impacts on the green infrastructure network are unavoidable, development will only be permitted if suitable mitigation measures for the network are provided.'

This policy is to be supported and applied to earlier policies.

For example:

Site allocation:

Land west of Wimblington Road Site Allocation SHELAA Dwellings Area (Ha) LP39.04 40382 (S. parcel) 152 7.07

Development should provide:

- A suitable vehicular access, and footway and cycleway connections including to Wimblington Road, Knight's End Road and the March Public Byway No. 18;

Every one of these sites and the comments must be reviewed for blatant errors concerning access. Should not be creating off road links to byways which do not include safe access for equestrians. Creation of cycle paths alongside roads does not comply with the new Highway Code. Equestrians are equally vulnerable road users as cyclists.

This principle needs to be adopted as policy and included in the preamble of the plan so that it feeds down through every development site which comes forward. It is not possible for a consultee to refer to every single site contained within the plan.

LP29: Green Infrastructure

Use of the clearly defined term Active Travel will be the easiest way to ensure consistency by planners and applicants. It will also meet the requirements of the Cambs ROWIP and the Cambridgeshire and Peterborough Local Transport Plan.

These are intended to be constructive comments. Planners, Councillors and other specialists without an interest in, or knowledge of, the equestrian industry, are unlikely to recognise the significance of exclusion of equestrian provision within such important documents as the Local Plan.

I would be very happy to provide further information should it be required.

Title:	Mrs	Position:	
First Name:	Susan	Organisation:	
Surname:	James		
Comment	Support		
I support the comments of the British Horse Society supporting LP29.			

Title:	Mr	Position:	
First Name:	Martin	Organisation:	Wildlife Trust for Bedfordshire, Cambrid
Surname:	Baker		
Comment	Object		
The Wildlife Trust supports the inclusion of this policy, as enhanced Green Infrastructure including accessible natural greenspaces is desperately needed in each of the 4 market towns to increase their attractiveness as places to invest in and to live and work.			

However, the Wildlife Trust is disappointed that the detailed site allocation policies do not follow through on this policy, by identifying locations for the provision of the strategic and local green infrastructure so desperately needed to improve the attractiveness of the towns and to help address the associated health challenges. Without specific identification of the scale and type of GI required including places for potential new GI provision then the Local Plan will fail to address the needs of the local population or achieve its stated objectives, including the attraction of future inward investment. A specific and detailed GI plan of action is required for the district.

Title:	Mr	Position:	Planning Manager
First Name:	Philip	Organisation:	Sport England
Surname:	Raiswell		
Comment	Support		
Sport England supports a policy that maintains and improves existing green infrastructure and encourages healthy and active lifestyles.			

LP29: Green Infrastructure

Title:

Position:

First Name: Christopher

Organisation:

Surname: Palmer

Comment **Support**

I support LP29 and would propose that the Council be more ambitious in creating a "Country Park" in Chatteris which will be much needed if the councils new housing units at 1,737 are to be achieved. The Council need to be actively promoting Health and Well Being and access to green open spaces. I would therefore propose that a Country Park could be achieved through the use of existing Council owned land to the East of 80 The Elms thereby seen as an enabler and joining up with two additional privately owned parcels of land (one of which being land at Wenny which has now been correctly taken out of the proposed Local Plan for housing development).

Title:

Position:

First Name: Andrew

Organisation:

Surname: Hammond

Comment **Neutral**

March formed a neighbourhood Plan after a consultation period in 2017. As part of the consultation, I provided comments which included the forming of walking/Cycle routes through and around the town of March. This suggested linking existing routes to other fringe areas around March effectively encircling March and the interconnecting routes through forming the spokes. (I even drew it out on the plan they provided.) It was based on minimising contact between pedestrians/cyclists and vehicular traffic. If we want people to be fitter, safer and in a greener society then this is the sort of policy that should be formulated in a plan that takes us through to 2040 otherwise we will not be any further forward even then.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Brenda

Organisation:

Surname: Bunn

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

Chatteris is deficient in all standards of Accessible Natural Green Space so this site is extremely important to local people. The site assessment says that Wenny Meadow meets the criteria for designation (in NPPF paragraph 102) due to its beauty, historic and recreational value, tranquility, and the amount and biodiversity of wildlife. The designation of the site as a Local Green Space received the support of 92% of voters in the Parish Poll on 7th June 2022 and the site received the most nominations for Local Green Space designation out of all sites in Fenland during the initial consultation.

Title: Mrs

Position:

First Name: Yvonne

Organisation:

Surname: Watson

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

Chatteris is deficient in all standards of Accessible Natural Green Space so this site is extremely important to local people. The site assessment says that Wenny Meadow meets the criteria for designation (in NPPF paragraph 102) due to its beauty, historic and recreational value, tranquility, and the amount and biodiversity of wildlife. The designation of the site as a Local Green Space received the support of 92% of voters in the Parish Poll on 7th June 2022 and the site received the most nominations for Local Green Space designation out of all sites in Fenland during the initial consultation.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Wesly

Organisation:

Surname: Palmer

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Title: Mrs

Position:

First Name: Wendy

Organisation:

Surname: Palmer

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: James

Organisation:

Surname: Burrow

Comment **Object**

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Title:

Position:

First Name: Robert

Organisation:

Surname: Stockman

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Nicola

Organisation:

Surname: Stockman

Comment **Object**

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Title:

Position:

First Name: Martin

Organisation:

Surname: Snow

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Samantha

Organisation:

Surname: Snow

Comment **Object**

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Title:

Position:

First Name: Steve

Organisation:

Surname: Hazell

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Graham

Organisation:

Surname: Bunn

Comment **Object**

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Title:

Position:

First Name: Paulette

Organisation:

Surname: Church

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Charlene

Organisation:

Surname: Moden

Comment **Object**

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Title:

Position:

First Name: Caroline

Organisation:

Surname: Turner

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Edward

Organisation:

Surname: Millard

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: Andrew

Organisation:

Surname: Riley

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Elaine

Organisation:

Surname: Rogers

Comment **Object**

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Title:

Position:

First Name: Robert

Organisation:

Surname: Mason-Hughes

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Melissa

Organisation:

Surname: Mason-Hughes

Comment **Object**

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Title:

Position:

First Name: Hazel

Organisation:

Surname: Lyons

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title: Mrs **Position:**
First Name: Suzanne **Organisation:**
Surname: Hodder

Comment **Neutral**

Please find below my suggestion for a Local Green Space designation which I would like submitted on my behalf to the draft plan consultation currently in progress.

Beauty - Recreational Value – Tranquillity - Richness of wildlife

The land now known locally as the wild flower meadow was part of an FDC decision notice for planning application F/98/1033/F which stated:

21 The landscaping proposals submitted in accordance with Condition 02 shall include the planting of an area at least 40.0 metres wide between greens 9, 11, 12, 6 (This section alongside 6 is what is now known as The Flower Meadow) and 7 and the site boundary. The planting in these areas shall include semi-mature trees and shrubs.

Reason – In the interests of the amenity of the area and local residents.

The site is approximately 2.5 hectares and is within easy walking distance for residents of Tydd St Giles and is one of only two open spaces in the village, the other being a community centre playing field with children's play equipment at the far end of the village.

The site is entered via a tree lined corridor from Eaudyke Bank and once through, it branches left onto a tree lined nature trail or you can walk straight on through the meadow. There are mature trees bordering the site on all sides and younger saplings and shrubs throughout. The meadow awash with flowers in the summer surrounded by trees is a most unusual sight in the flat Fenland landscape. At different times of year this unusual landscape appears to have its own individual climate, where it can often feel warmer than the more open areas of land outside of the meadow.

This wild flower meadow is a treasured and much needed asset and amenity for the village of Tydd St Giles and the surrounding areas. It has been used by local residents on foot, bikes and horses for over twenty years and it is a particular favourite for dog walkers. The mature trees on all sides shelter the area from the weather and outside noise, giving an air of tranquillity to the space, making it ideal for quiet walks and contemplation.

During the Covid-19 lockdowns the meadow was invaluable and the foot traffic through this area trebled overnight. We have personally walked this meadow daily for the last decade since moving to the area in 2013, although we also regularly walked it in the preceding decade when visiting family who moved here in 1999.

It also acts as an important corridor for an abundance of wildlife including Badgers, Barn Owls, Small Owls, Tawny Owls, Bats, Woodpeckers, Deer (both Roe and Muntjac) and a plethora of birds including birds of prey and Cuckoos which return annually. In fact over the last 22 years it has been allowed to develop into a 'wildlife haven'.

Our village is surrounded by a very flat open landscape but much of it is farmed and off limits to residents and visitors alike. This meadow is an important asset to our village and as already mentioned is one of just two open spaces available to residents. The community centre playground is more suited to younger families and the site does not allow dogs. The meadow is suitable for use by all residents young and old along with dogs and horses and wildlife. It creates a wonderful space for teaching the young about nature and to introduce them to insect and wildlife habitats, we often see young families over there exploring together, encouraging their children to discover the wonders of the natural environment around them, and documenting their finds with pencil drawings and photographs. We believe this site is of great importance and should be protected with a Local Green Space designation.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Richard

Organisation:

Surname: Unsworth

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: Matthew

Organisation:

Surname: Ashley

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Paul

Organisation:

Surname: Sadler

Comment **Object**

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Title:

Position:

First Name: Suzanne

Organisation:

Surname: Cole

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Andrew

Organisation:

Surname: Lenton

Comment **Object**

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Title:

Position:

First Name: Louisa

Organisation:

Surname: Lenton

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: J

Organisation:

Surname: Osborne

Comment **Object**

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Title:

Position:

First Name: Catherine

Organisation:

Surname: Bell

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Peter

Organisation:

Surname: Rickard

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Title:

Position:

First Name: David

Organisation:

Surname: Bailey

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Susan

Organisation:

Surname: Hazell

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Title:

Position:

First Name: Stephanie

Organisation:

Surname: Cole

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Alison

Organisation:

Surname: Pardon

Comment **Object**

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Title:

Position:

First Name: Christopher

Organisation:

Surname: Bray-Allen

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: David

Organisation:

Surname: Carter

Comment **Object**

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Title:

Position:

First Name: Lisa

Organisation:

Surname: Carter

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title: Mrs **Position:**

First Name: M R **Organisation:**

Surname: Hatch

Comment **Object**

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Title: Mr and Mrs **Position:**

First Name: Terry and Deborah **Organisation:**

Surname: Mason

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Graham

Organisation:

Surname: Cox

Comment **Object**

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Title:

Position:

First Name: Marion

Organisation:

Surname: West

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Andrew

Organisation:

Surname: Pluck

Comment **Object**

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Title:

Position:

First Name: Christine

Organisation:

Surname: Cunningham

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:		Position:	
First Name:	Matthew	Organisation:	
Surname:	Cooper		
Comment	Object		
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Title:	Ms	Position:	Chair
First Name:	Ruth	Organisation:	Doddington Parish Council
Surname:	Huften		
Comment	Support		
Part C indoor sports			
Fully support this policy.			

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Gary

Organisation:

Surname: Garner

Comment **Object**

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Title:

Position:

First Name: Eleanor

Organisation:

Surname: Hurrell

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:		Position:	
First Name:	John	Organisation:	
Surname:	Moore		
Comment	Object		
I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.			
I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.			
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Title:		Position:	
First Name:	G	Organisation:	
Surname:	Brierley		
Comment	Object		
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LP30: Local Green Spaces and Other Existing Open Spaces

Title:		Position:	
First Name:	John	Organisation:	
Surname:	Paul		
Comment	Object		
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Title:		Position:	
First Name:	Julie	Organisation:	
Surname:	Palmer		
Comment	Support		
'Part B: Other Existing Open Space Existing non-designated open spaces will, in principle, be protected from development. New development that will result in the loss of existing open space will not be supported, unless the criteria in the NPPF are met.'			
I agree with the above policy as I believe Chatteris is woefully lacking in green space, particularly natural green space such as can be found at Wenny Meadow (site ID 40284) which should absolutely be formally designated as green space. Every town in Fenland should have access to natural green space as part of the Health and Wellbeing strategy. This is especially important in Fenland as over 70% of the adult population is classed as obese and health outcomes can only be worsened by removal of existing green space.			

LP30: Local Green Spaces and Other Existing Open Spaces

Title:		Position:	
First Name:	Alex	Organisation:	
Surname:	Ashley		
Comment	Object		
I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.			
I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.			
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Title:		Position:	
First Name:	Adam	Organisation:	
Surname:	Belcher		
Comment	Object		
I disagree that the meadow should be included for development. Why are you going against what 92% of Chatteris want!?			

Title:		Position:	
First Name:	Nicholas	Organisation:	
Surname:	Rudd		
Comment	Object		

LP30: Local Green Spaces and Other Existing Open Spaces

Title: Mr **Position:**

First Name: Ian **Organisation:**

Surname: Mason

Comment **Object**

Since the first draft of this plan we have had the Chatteris Parish Poll with its 92% support for Local Green Space [LGS,] designation. I wrote to FDC and Councillor Boden on behalf of SWRM on Wednesday 8th June 2022, to bring this to the attention of the local plan team. It doesn't seem to have made any impact or be worthy of note. That 33 of the 46 nomination for LGS in Fenland were for the whole meadow, that significant democratic result seems to have been ignored. All that is in this latest draft is the 'historically important' area put forward by the developer, which is less than half of the total area of the meadow.

Title: **Position:**

First Name: Christine **Organisation:**

Surname: Hennessey

Comment **Neutral**

Keep some areas for people to walk and enjoy.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Matthew

Organisation:

Surname: Carpenter

Comment

Object

I support the allocation of Wenny meadow as local green space (LGS), however, please see objection below to the fact that the whole of the meadow has not been allocated as LGS.

Only part of Wenny Meadow has been allocated as Local Green Space. It is my view that the whole of the site should be allocated as LGS.

The whole of the site has been used for public recreation for more than 100 years. Whilst this may not be formal, there is at least one letter in Chatteris Museum that references the land as being used for recreational purposes. In addition, I have been resident in Chatteris for more than 10 years, and am aware of family and friends that have used the meadow for recreation for over 25 years. I myself have used the meadow as such.

I understand that at the time of writing a planning application is apparent on the remainder of the land, and I have been told that this has restricted allocation of the whole site. This is in direct conflict with the NPPF. Paragraph 101 of the Framework confirms that the designation of land should be undertaken through the local plan. That time is now. If the councils approach was correct, then many developers would submit applications as local plans were being drafted or revised to avoid land be allocated as LGS.

Whilst paragraph 101 does advise that the designation should last beyond the plan period, the councils approach of not allocating because of an application is perverse. Indeed, I would suggest that such a failure to allocate is indeed contrary to the Framework.

A local vote has confirmed that over 10% of the population voted to retain the whole of the land as open space, and there is significant evidence to suggest it has been used as such for many years.

In addition, the meadow is a natural haven for wildlife. As the town expands, allocation of virgin land elsewhere will take many decades to establish itself anywhere near the quality of the meadow today.

In addition to the above, I draw the councils attention to 10% ecological net gain, and the requirement of any development on the land to meet that test, and to accord with the councils own duty of care to protect such land, especially in light of the legal outcome of the “dutch” cases in relation to neutrality. The same duty to consider and account for future generations applies here.

I also draw the councils attention to R(Legard) v RBKC - Dove J confirmed that the requirement of the land (in the Chatteris case all of the land) must “serve” the community. That is met where a site is “demonstrably special” and holds “particular significance” for the local community. Evidence gained by the wider public confirm that the whole site is demonstrably special and is particularly significant for a significant proportion of the local community.

It is my opinion that the whole of the Wenny Meadow site is a significant resource to the market town of Chatteris. I believe the town council have acted inaproratly in relation to the matter, but never the less, the draft local plan allocation should be extended to cover the whole site. Allocation if the current application is refused is not the correct way to deal with matters.

I note that there is a current planning application for the remainder of the meadow. This has no bearing on the local plan allocation and, whilst undetermined, carries no planning weight what so ever.

NPPF may be concerned that allocation may not be excessive, and not prevent the provisions of homes. Chatteris has large tracks of open land on all sides. It only has one green lung within the town, and so close to the town centre. Whilst there are other formal council owner parks, there is no other informal space, away from children playgrounds that allow the use, such as the meadow. Allocation of the whole of the meadow will have no material impact on the

LP30: Local Green Spaces and Other Existing Open Spaces

Title:		Position:
First Name:	Rachel	Organisation:
Surname:	Evans	
Comment	Object	
I dont live in Chatteris , but my partner was born and lived there 30yrs. I feel this area should , in its entirety , but Green Space.		

Title:	Mrs	Position:
First Name:	Suzanne	Organisation:
Surname:	Hodder	
Comment	Support	
Local Green Space nomination Newgate Road Tydd St Giles		
I realise this site is not a green space as such with it being classed as agricultural farmland however, it offers an uninterrupted view of the vast iconic Fenland skies beyond, a view loved by many residents and one that I feel should be protected for the amenity of the area and for local residents.		

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Katie

Organisation:

Surname: Leach

Comment

Object

I support policy LP30 and it's intention to designate Local Green Space in Fenland and identify these within policy maps . I also support the policies intention of recognising non-designated open spaces and protecting them from development where they make a contribution to green infrastructure and biodiversity.

I am a Chatteris resident and while I welcome this policy I have an issue with the Local Green Space allocated for Chatteris. The space allocated as Local Green Space off Wenny Road is not sufficient and does not cover the whole area that merits designation. I have marked up the attached plan with areas A and B that I also feel should be included within this Local Green Space designation. Area A should be fundamentally part of the Local Green Space designation and Area B should be considered for the designation.

With regards to area A it is intrinsically related to the area proposed as Local Green Space and there is no boundary between the two. If the proposed area meets the criteria for Local Green Space under paragraph 102 NPPF July 2021 then by default Area A must also (it's the same bit of land) . As a local resident I can confirm the proposed area and Area A meet the criteria for designated Local Green Space as defined by paragraph 102 NPPF July 2021 as it is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and not an extensive tract of land

Indeed it's value to the local community under item b) was recently the subject of a Parish Poll and this should merit consideration as part of the evidence base.

As the local plan proposed area of Local Green Space and the area A I have suggested are one space I am concerned that value of the proposed area of Local Green Space would be diminished and harmed if the whole area it forms part of was not designated Local Green Space. The biodiversity, beauty and historic significance comes from the whole and we know it all has strong biodiversity value particularly from surveys which have been carried out in connection with a recent development proposal. What was the evidence base on which the decision was made to mark only a part of the area as Local Green Space?

Chatteris lacks good quality green space (of a quality that had beauty and richness of wildlife) and we also lack good access to the countryside which makes the value of the land odd Wenny Road particularly high in this area. It is critical that the Local Green Space designation is not tokenism/ greenwashing but is properly used to protect that which should be protected.

I trust you will take account of the points I have raised.

LP30: Local Green Spaces and Other Existing Open Spaces

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

Comment **Neutral**

The Council wishes to put forward the following to be considered as Local Green Spaces

Recreation Grounds and play areas at:

Wenny Road, Furrowfields, Huntingdon Road, Larham Way, St Pauls Drive, Cricketers Way, Lancaster Way, Willey Terrace and Hunters Close.

Green Areas at: Tithe, Queensway, Heronshaw, Treeway, Whitemill (including the pond), Burnsfield estate, Eastwood, the rear of the Parish Church, Huntingdon Road (Adjacent the A141), St Stephens Drive, Ash Grove, Harold Heading Close and Southampton Place, junction at Blackmill and Fairway, Slade Way, Fenview, Westbourne, Fairview Avenue, Lindsells walk, New Road, Green Park, between Tesco and the drain, Wood Farm (London Road), junction of station street and station road. The old Railway Line Footpath and Bridleway.

Sports Venues:

Football ground as West Street, football ground at Peacocks Paddock (Wenny Road) football field behind the Sportsman (Fairway) Cricket Club ground (Wenny Road) Bowls Club ground (wood Street)

School Playing Fields at Cromwell, Kingsfield and Glebelands

Public Gardens and Cemeteries, Jubilee Gardens, Market Hill Gardens, garden at the top of Huntingdon Road. Two cemeteries (new road).

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: George

Organisation:

Surname: Sharp

Comment **Neutral**

I would request that you consider my application Local Green Space designation for the land known locally as the wild flower meadow and was part of an FDC decision notice for an earlier planning application F/98/1033/F which stated:

21 The landscaping proposals submitted in accordance with Condition 02 shall include the planting of an area at least 40.0 metres wide between greens 9, 11, 12, 6 (This section alongside 6 is what is now known as The Flower Meadow) and 7 and the site boundary. The planting in these areas shall include semi-mature trees and shrubs. The Reason being in the interests of the amenity of the area and local residents.

The flower meadow and foot path covers an area of approximately 2.5 hectares and is within easy access for residents of Tydd St Giles. It is one of only two open spaces in the village, the other being an open aspect playing field with children's activity equipment adjacent to the Village Community Centre at the other end of the village.

The site, accessible all year round, is a tree lined corridor flanking Eaudyke Bank with access from the village via Eaudyke Bank. It is used locally by village residents and visitors as a nature trail, and you can walk straight on through the meadow via a branch in the path. There are mature trees bordering the site on all sides and many self-sown saplings and shrubs throughout. The meadow supports many wild flowers and is a reminder of nature's past glories, its diversity a beauty. Those that experience the sight can only be moved by their experience.

Living adjacent to this natural corridor I am aware of the abundant wildlife this important corridor supports including Merlin (rare), Barn Owls, Small Owls, Tawny Owls, Bats (various), Woodpeckers (Green & Large spotted), Deer (both Roe and Muntjac), Badgers, Stoats, Grass snakes, Newts, Frogs and Toads and a plethora of small migratory seed eating birds. The activity of various birds of prey underpins knowledge that the area contains considerable small mammal population.

The village of Tydd Saint Giles is located in a typical fenland flat open landscape. The land is predominantly farmed and inaccessible for leisure and recreation. This meadow is an important asset to the village as the dynamic of the village has changed from mainly a farming agricultural community to one where the residents are commuting locally to larger towns in the area, freelance working from home or retired. Although with the open aspect of the countryside giving the impression of open space there is very little opportunity for visitors or residents to relax and exercise. To lose this village asset would be a retrograde step in the well being of many of the village residents of all ages.

Please note: The map supplied is to give an indication of the meadow area including the canopy of the trees on all sides; it is not meant to incorporate any of the golf course.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:	Mr	Position:
First Name:	Geoff	Organisation:
Surname:	Newham	

Comment **Neutral**

Local Green Space nomination that runs the length of Newgate Road in Tydd St Giles

Reason – In the interests of the amenity of the area and local residents – to enhance our mental health – to promote a sense of wonderment

This piece of land is categorised as Grade 1 Agricultural and is farmed continuously.

It may not fit the normal description of a ‘local green space’ since it’s more often brown. As each year’s crop grows, the greenery gradually wins out over the brown, until it turns a golden hue glorified by a summer’s setting sun. The passing seasons are reflected in the timeless cycles of cultivation.

Everyone who lives facing onto this openness extols its virtues, and reveres the pleasure brought by the view across this stretch of land to the far horizon where the day’s weather can be seen accumulating and gathering momentum. In this day of immediacy, crushing crowds, fast clutter and instant communication, such sights are literally a breath of fresh air. Although the sight could just as easily foretell the arrival of a darkening malevolence being herded towards us by a strengthening sou’wester.

So many of the villagers walk down (or up) this road on a regular basis, and not just those with dogs. All the other village roads around the central square are closed in by houses on both sides. So often, especially during the summer months when villagers have friends and relatives to stay, the typical familial gaggle can be seen drifting in conversation along Newgate Road, pointing and marvelling at the distant horizon and the huge expanse of sky. While house martins and swifts swoop and shriek as they tirelessly feed their young, owls silently cruise the dykes that separate the fields searching for prey. Kestrels hover and buzzards mew to each other as they soar on the thermals. And there are countless hare chasing each other through the young crops; jackdaws and crows strutting along ploughed lines, their beaks prodding the ground in search of grubs; pheasants gliding in to land, colourful and proud. As evening draws in, bats take over and the owls hide in the shadows behind echoing calls.

Even after 12 years, I am still mesmerised by the sight of this vast and open view. I can breathe again after my journey. I have elbow room. I am calm. So many times I have to drag myself away from an upstairs window where I’m caught in a timelessness, where my thoughts have floated away; my mind has emptied. This view is cathartic, purifying, and restful.

Much of Newgate Road was built in the 1930s, and its houses are now on a final run to their centenary. And these houses can be seen from several vantage points from as far away as five miles. There’s a history here, one that’s represented by a constant, a history that reaches back to dirt roads and barefoot children, when a ditch separated the roadway from the houses and each dwelling had its own footbridge. They’re guardians of the fields they face.

FDC’s Local Plans, from the historical and current to the soon-to-be, have all voiced the same protective objectives, have all had the same vision – to preserve the distinctive character of the Fenland Landscape; to conserve its unique, open and defining characteristics as well as its distinct settlement patterns.

The introduction to the New Local Plan acknowledges that Fenland has a unique environmental character but with Poor public open space provision. The Plan’s objectives are to Minimise the irreversible loss of undeveloped land, particularly high-grade agricultural land; conserve its intrinsic character and beauty; and, maintain the essential character of each settlement. The new Draft Plan continues to reiterate its Vision for a ‘unique and protected Fens landscape’, conserving and enhancing our natural and historic environments, and their assets.

Newgate Road is the only place in the village of Tydd St Giles, where the open Fens landscape meets an historic line of houses, which jointly reflects the vision and objectives contained in each version of the Local Plan for the last 30 years. And walking the length of Newgate Road is a real joy, a joy provided by the openness that defines where the

LP30: Local Green Spaces and Other Existing Open Spaces

village meets its agricultural heritage. A combination that should be preserved in perpetuity.

Title:	Mrs	Position:
First Name:	Francine	Organisation:
Surname:	Savill	

Comment **Neutral**

Beauty - Recreational Value – Tranquillity - Richness of wildlife

We have two easily accessible green spaces in Tydd St Giles, they are at either end of the village and each has its own function. One is a playing field adjacent to the Community Centre and the other is the 'Wild Flower Meadow'. The site is within easy walking distance for residents of Tydd St Giles.

The meadow is bordered on all sides by mature trees giving it a sheltered and tranquil feel, there is a nature walk incorporated into the site on one side and a mowed and regularly maintained walkway through the meadow itself. There are sapling trees dotted about both planted and self-seeded, with various shrubs, gorse and wildflowers on the rest of the site. This little oasis is most unusual when compared with the flat open landscape of the Fens.

I believe the wild flower meadow is an important and much needed asset in our village for both residents and visitors to the area. It has been in use for over twenty years and played an important role during the Covid lockdowns. It provided a place for quiet reflection and solitude and at no cost to those using it, this factor is even more important now given the current economic crisis. The ability to meet the costs involved with leisure memberships is no longer affordable for many and the option to exercise via walking and cycling is much more appealing. The meadow is used by local residents on foot, bikes and horses on a daily basis and is an absolute favourite with dog owners. I moved to the area in 1999 and have walked the meadow many times; now passed retirement age it provides the opportunity for me to exercise within a short distance of my home and without having to drive anywhere. I believe it is appealing to residents of all ages and in particular as in my case the older residents.

It is also a haven for wildlife and the perfect place for birdwatching, in the evenings especially you can often hear Owls calling between the trees or see bats flying overhead catching insects and in the Spring the sound of the Cuckoo echoes round the site.

I believe this site is demonstrably special to our village and deserves a Local Green Space designation. The land now known locally as the wild flower meadow was part of an FDC decision notice for planning application F/98/1033/F which stated:

21 The landscaping proposals submitted in accordance with Condition 02 shall include the planting of an area at least 40.0 metres wide between greens 9, 11, 12, 6 (This section alongside 6 is what is now known as The Wild Flower Meadow) and 7 and the site boundary. The planting in these areas shall include semi-mature trees and shrubs.

Reason – In the interests of the amenity of the area and local residents.

LP30: Local Green Spaces and Other Existing Open Spaces

Title: Mr **Position:**
First Name: Chris **Organisation:**
Surname: Hodder

Comment **Neutral**

Please find below my suggestion for a Local Green Space designation which I would like submitted on my behalf to the draft plan consultation currently in progress.

Beauty - Recreational Value – Tranquillity - Richness of wildlife

I walk and cycle the meadow several times a day most days. I enjoy taking photos of the wildlife I spot on my walks and the wild flowers in the meadow offer a wonderful opportunity to take photos of the varied insects on site.

The flower meadow site measures approximately 2.5 hectares and is one of only two open spaces within the village. These open spaces are at opposite ends of the village, the meadow is alongside Eaudyke Bank and the community centre playing field is alongside Broad Drove East, both sites are within easy walking distance for all residents and offer very different experiences.

A sheltered tree lined walkway leads into the flower meadow from Eaudyke Bank, you will then find a manicured trail path to the right which leads you round and then through the meadow, alternatively you can take the left branch as you enter the site and follow the tree lined nature walk which runs parallel to Eaudyke Bank. The entire site is surrounded by mature trees giving it a tranquil and secluded feel, almost as though it is cut off from the outside world. The flower meadow is full of the sound of buzzing insects in the summer awash with flowers and with shrubs and saplings dotted about throughout.

This site is much loved by the residents of Tydd St Giles and visitors to the area, providing a very unusual location within the flat Fenland landscape. It is a valued asset and amenity and has been in use for over 20 years. I have personally walked/cycled this meadow for almost a decade since moving here in 2013 and had walked it in the previous decade too prior to moving here when visiting family who moved to the area in 1999. It is a favourite walk for dog owners and horse riders and you will often find cyclists negotiating the trails too.

During the Covid-19 lockdowns the meadow was invaluable and the foot traffic through this area trebled overnight.

It also acts as an important corridor for an abundance of wildlife including Badgers, Barn Owls, Small Owls, Tawny Owls, Bats, Woodpeckers, Deer (both Roe and Muntjac) and a plethora of birds including birds of prey and Cuckoos which return annually. In fact over the last 22 years it has been allowed to develop into a 'wildlife haven'.

Our village is surrounded by a very flat open landscape but much of it is farmed and off limits to residents and visitors alike. The community centre playground is more suited to younger families and sporting events, the site does not allow dogs either. The flower meadow encourages people to exercise but without the costs involved with a gym membership which many can ill afford given the current economic crisis. It also offers the chance for quiet contemplation away from the stresses and strains of everyday life.

We believe this site is of great importance and is demonstrably special to locals and visitors to Tydd St Giles and it should be protected with a Local Green Space designation.

The land now known locally as the wild flower meadow was part of an FDC decision notice for planning application F/98/1033/F which stated:

21 The landscaping proposals submitted in accordance with Condition 02 shall include the planting of an area at least 40.0 metres wide between greens 9, 11, 12, 6 (This section alongside 6 is what is now known as The Flower Meadow) and 7 and the site boundary. The planting in these areas shall include semi-mature trees and shrubs.

Reason – In the interests of the amenity of the area and local residents.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:	Mr	Position:
First Name:	Ian	Organisation:
Surname:	Mason	

Comment	Object
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I believe that the site (Wenny Meadow) does qualify for Local Green Space designation according to the criteria in Paragraph 102 of the National Planning Policy Framework. To reiterate the points I made in my letter of 8th June 2022:-

- a) The site is in close proximity to the community that it serves. The site is immediately adjacent to the proposed settlement boundary, is directly opposite the Cromwell Community College primary and secondary schools, and is only a few minutes' walk from Chatteris' high street.
- b) The site is demonstrably special to the local community. The fact that 92% of people voted in favour of Local Green Space designation confirms this. The site also holds particular local significance:
 - i) As the former Manor Park, the site is of local importance as an historic landscape park.
 - ii) Mediaeval ridge-and-furrow earthworks extend across the entire site.
 - iii) The richness of wildlife at the site is also very significant. Ecologists that have surveyed the site have described it as being of "county level importance" for certain types of wildlife.
 - iv) The site is home to ten protected species of bats, including the rare "barbastelle bat" that is rarely seen in Cambridgeshire.
 - v) The site is home to a number of red-list and UK Biodiversity Action Plan priority species.
 - vi) The site supports three species of reptile, making it a "key site" for reptiles under the Froglife/CEEIM definitions.
 - vii) The site is home to rare pseudoscorpions only usually found at sites like Sherwood Forest, Epping Forest, and Windsor Park.
 - viii) The area currently identified in the proposed Draft Local Plan would not be sufficient to help protect this biodiversity value without the rest of the site. Prof Brian Eversham, CEO of the Cambridgeshire & Bedfordshire Wildlife Trusts, says that the wildlife at Wenny Meadow will not survive the "fragmentation" of the habitats at the site. It is therefore important that Wenny Meadow is designated as a Local Green Space as a whole.
- c) The site is not an "expansive tract of land", but is a clearly defined piece of land as outlined on the map provided with the poll materials I attached in my letter of 8th June 2022.

I note that government guidance on "Open space, sports and recreation facilities, public rights of way and local green space" says (in Paragraph: 008 Reference ID: 37-008-20140306) that "Local Green Space designation will rarely be appropriate where the land has planning permission for development."

Although the site is the subject of a planning application (F/YR21/0981/F), this permission has not been granted so the inclusion of the entire site as a designated Local Green Space in the Draft Local Plan would not currently be inappropriate. I also note that the site is the subject of an approved Broad Concept Plan (June 2017), but we have separately been told by Fenland District Council that this is not planning permission and that the decision to approve the BCP was not a planning decision, so this should be no barrier to Local Green Space designation either.

In addition it is worth noting that every effort to have Tree Preservation Orders placed on all the mature trees in the Wenny Road meadow precinct has met with total inactivity by the FDC's part time consultant Tree Officer. An application was submitted by me on behalf of Chatteris Past Present & Future Civic Society in September 2019 which should have gone to the owners of the land for comment then approval by FDC planning before finally submission to the Land Registry. The Tree Officer using Covid-19 and lack of email access eventually apologised for the delay. I was only able to find out about this lack of process through the FDC Conservation Officer. I believe the Tree Officer re-surveyed the site in early September 2022 with his new GPS device to ensure my references were accurate ! I can only conclude this is an attempt to stop any individual TPOs being put in place before the developers final planning application is submitted for the meadow.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Patrycja

Organisation:

Surname: Juszczyzyn

Comment

Object

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

Chatteris is deficient in all standards of Accessible Natural Green Space so this site is extremely important to local people. The site assessment says that Wenny Meadow meets the criteria for designation (in NPPF paragraph 102) due to its beauty, historic and recreational value, tranquility, and the amount and biodiversity of wildlife. The designation of the site as a Local Green Space received the support of 92% of voters in the Parish Poll on 7th June 2022 and the site received the most nominations for Local Green Space designation out of all sites in Fenland during the initial consultation.

Title:

Position:

First Name: Carl

Organisation:

Surname: Pardon

Comment

Object

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Helen

Organisation:

Surname: Beston

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: Claudia

Organisation:

Surname: Buchan

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Daniel

Organisation:

Surname: Rowell

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Title:

Position:

First Name: Gemma

Organisation:

Surname: Rowell

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Rebekah

Organisation:

Surname: O'Driscoll

Comment

Object

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Title:

Position:

First Name: Kim

Organisation:

Surname: Waters

Comment

Object

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Zoe

Organisation:

Surname: Vawser

Comment **Object**

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I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Title:

Position:

First Name: Patricia

Organisation:

Surname: Brooks

Comment **Support**

This policy states that existing open spaces will in principle be protected from development. Wenny Meadow is one such local space, please protect it!!!!

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Gemma

Organisation:

Surname: Whatley

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could "endure" beyond the plan period.

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Title:

Position:

First Name: Carole

Organisation:

Surname: Nottage

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Nicola

Organisation:

Surname: Duncan-Finn

Comment **Object**

In view of the evidenced significance of this site as a natural habitat with high biodiversity value, I believe the whole site of Wenny Meadow should be protected as opposed to only part of the meadows proposed within this policy.

Title:

Position:

First Name: Jenny

Organisation:

Surname: Comont

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Jane

Organisation:

Surname: Mason

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: Joanne

Organisation:

Surname: Cannings

Comment **Object**

Wenny Meadow

This is a fantastic area for family's to enjoy near our house and if your already taking the field near the end of the elms for housing and then you take wenny where are our children in the farriers gate/elms/birch area supposed to take our kids/dogs out apart from wenny park which has a lot of antisocial behaviour! What about all the wildlife too. What about the extra pressure it wil put on the roads doctors chemist etc who already struggle. Leave us some green space to enjoy! It's all part of the reason I moved to the country side.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Claire

Organisation:

Surname: Newton

Comment

Object

I agree that Local Green Spaces should be identified and protected in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as a Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of site 40284, and it would seem more likely than not that the site could "endure" beyond the plan period.

Chatteris is deficient in all standards of Accessible Natural Green Space so this site is extremely important to local people. The site assessment says that Wenny Meadow meets the criteria for designation (in NPPF paragraph 102) due to its beauty, historic and recreational value, tranquillity, and the biodiversity of wildlife. The designation of the site as a Local Green Space received the support of 92% of voters in the Parish Poll on 7th June 2022 and the site received the most nominations for Local Green Space designation out of all the sites in Fenland during the initial consultation.

Title:

Position:

First Name: Carole

Organisation:

Surname: Stronge

Comment

Object

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:		Position:	
First Name:	Lee	Organisation:	
Surname:	Bevens		

Comment Object

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:		Position:	
First Name:	Frances	Organisation:	
Surname:	Aspinall		

Comment Object

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LP30: Local Green Spaces and Other Existing Open Spaces

Title: _____ **Position:** _____

First Name: Jane **Organisation:** _____

Surname: West

Comment **Object**

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Title: Mr **Position:** _____

First Name: John **Organisation:** _____

Surname: Humphrey

Comment **Object**

Green space submission 60012 (excluded from Draft LP)

This is a great central site for villagers in a ever expanding village. Place to walk dogs away from the playing field wild open natural space,a small jubilee wood ???? Has already been planted with a tree with ever pupils name on present at the village primary school during Queens jubilee year.

The field has so much potential for the whole village of WSM.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Steve

Organisation:

Surname: Day

Comment **Object**

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Title:

Position:

First Name: Janet

Organisation:

Surname: Needham

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Lynette

Organisation:

Surname: Law

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Title:

Position:

First Name: Lesley

Organisation:

Surname: Heather

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Gary

Organisation:

Surname: Heather

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: Bryan & Linda

Organisation:

Surname: Misseldine

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Michelle

Organisation:

Surname: Freeman

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Title:

Position:

First Name: Robert

Organisation:

Surname: Parr

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Elizabeth

Organisation:

Surname: Dunn

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: Louise

Organisation:

Surname: Bradshaw

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Sue

Organisation:

Surname: Day

Comment **Object**

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Title:

Position:

First Name: Antanas

Organisation:

Surname: Lankutis

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name:

W

Organisation:

Surname:

Wilson

Comment

Object

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Title:

Position:

First Name:

Anthony and Carol

Organisation:

Surname:

Beckett

Comment

Object

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LP30: Local Green Spaces and Other Existing Open Spaces

Title: Mrs **Position:**

First Name: Sarah **Organisation:**

Surname: Everest

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title: **Position:**

First Name: Hazel **Organisation:**

Surname: Rudd

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Sarah

Organisation:

Surname: Thompson

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: Tim

Organisation:

Surname: Fitches

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Rosalind

Organisation:

Surname: Fitches

Comment **Object**

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Title:

Position:

First Name: Penny

Organisation:

Surname: Bale

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: John R

Organisation:

Surname: Ivory

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Title:

Position:

First Name: Paul

Organisation:

Surname: Dunn

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Shirley

Organisation:

Surname: Binham

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title: Mr

Position:

First Name: Barry

Organisation:

Surname: Hookway

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Gavin

Organisation:

Surname: Price

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Lawrence

Organisation: Friends of Wenny Road Meadow

Surname: Weetman

Comment **Object**

LGS 1 (Wenny Meadow)

Object to council's decision not to designate in full:

The Friends of Wenny Road Meadow strongly disagree with the council's decision not to designate LGS 1 (Wenny Meadow) as a Local Green Space in its entirety.

Local Green Space designation for this site was supported by 92% of voters in a parish poll held on 7th June 2022. This is the only section of the Fenland emerging local plan to have been subject to this kind of direct democracy, with a very clear result. While we note that Chatteris Town Council has been reticent to support designation of Wenny Meadow as a Local Green Space, the poll result was clearly decisive and should be treated as the true democratic representation of the desires of Chatteris residents - who all had an equal opportunity to vote in the very well-advertised parish poll.

We agree with the council's assessment, outlined in the LGS Evidence Report (May 2022), that the site meets all of the NPPF criteria of beauty, historical value, recreational value, tranquillity, and importance for wildlife.

We were therefore surprised that the council opted not to include the site as a designated Local Green Space solely on the basis of the live planning application for the site, despite that site (Site 40284) having been removed from the settlement boundary in the draft plan.

NPPF 101 says that Local Green Space designations should be consistent with "the local planning of sustainable development". As set out in our response to the Site Assessment 40284, is clear from the developer's own viability report that the development of this site would not be sustainable development in accordance with the plan due to - among other things - insufficient affordable housing (against LP12 of the emerging plan, and LP5 of the adopted plan) and insufficient developer contributions towards health and education (against LP5, LP19 of the emerging plan, and LP2, IDP/LP13 of the adopted plan). The viability of this site will be worse, still, if the applicant must pay to off-set the significant Biodiversity losses. The designation of the site as a Local Green Space would therefore not be inconsistent with planning for sustainable development, since all of the existing evidence shows that the development of this site is not sustainable.

The emerging local plan acknowledges that this site faces significant barriers to delivery, and is therefore unsuitable for inclusion in the area designated for housing. There has been no activity from the applicant on this application for many months, with many outstanding issues left unresolved. The decision not to designate the site as a Local Green Space purely on the basis that there is a live planning application for the site would appear to open a worrying loophole, through which any landowner could submit a planning application - whether it has any merit or not - and indefinitely keep that planning application "live" for the duration of a local plan process in order to avoid any adverse planning policies being enacted in relation to development of the site. Such a loophole would obviously have a serious detriment to local plan making, so the existence of a live application must not be permitted to be used as a reason against designation.

Given these significant concerns, The Friends of Wenny Road Meadow sought independent legal opinion from Stephanie Hall of King's Chambers, a junior barrister who specialises in planning. We wanted to establish whether or not the undetermined live planning application is a particular barrier to the site being designated as a Local Green Space. In her opinion, the live planning application does not provide such a barrier to designation.

Paragraph 101 of the NPPF and 37-007 of the PPG refer to local plan-making and require consistency with the local plan. They do not require consistency with potential future permissions that may or may not be granted. That being so, in relation to questions 4a and 4b of the LGS Evidence Report, the Council should have confined itself to considering consistency with the emerging plan position.

LP30: Local Green Spaces and Other Existing Open Spaces

Upon a proper consideration, the designation of the whole site would be entirely consistent with the Council’s position in the emerging plan and therefore the designation is consistent with “local planning of sustainable development”.

It is noted that the existence of the pending application is the sole reason relied upon for not designating the entire site and when NPPF 101 is properly considered this falls away.

The default should therefore be for the Site to be proposed for designation as LGS through the emerging plan now. Should any planning application be granted later, then the designation could be revised through modifications to the plan at a later stage.

The Council’s position appears to presume that the pending application will be granted. However, if the site meets the criteria for LGS now, which it does, it ought to be designated now. The outcome of the development-management process, which could take many months or years if an appeal is made against any refusal, should not be pre-judged. Instead, as part of the emerging plan, it should be recognised that at present the Site meets the tests for designation as LGS.

It has been pointed out to me that we should be abundantly clear which land we refer to when we say "LGS 1".

This is the land that was the subject of "call for local green space" submissions in 2019 with the site IDs: 60001, 60002, 60003, 60009, 60010, 60013, 60014, 60015, 60016, 60017, 60018, 60019, 60020, 60021, 60022, 60023, 60024, 60025, 60026, 60027, 60028, 60029, 60030, 60031, 60032, 60033, 60034, 60035, 60036, 60039, 60040, 60042.

A copy of the plan for one of these submissions is attached.

Title:		Position:	
First Name:	Lawrence	Organisation:	Friends of Wenny Road Meadow
Surname:	Weetman		
Comment	Support		
Support, with concerns about one site:			
The Friends of Wenny Road Meadow welcome the inclusion of Local Green Space designations in accordance with the NPPF 101-103.			
We disagree with the decision not to fully allocate LGS 1 (Wenny Meadow) and will expand on this in a separate submission.			

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Valerie

Organisation:

Surname: Emmons

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Wenny Meadow is a rare gem in Fenland and the only accessible (thanks to the current owners) green space of its kind in Chatteris. The Meadow offers tranquil and unspoiled space in the town, which has a rich variety of flora and fauna, plus historic value. It has long been a place of recreation for residents.

We are surrounded by farmland here, and so, though living in the countryside, there are few places where Chatteris people can walk and meet without the need to travel by car. The old railway line has the disadvantage that it is just footpaths, and they are shared by cyclists, motorcyclists and horses, and there is a very different atmosphere there. Some women I have spoken to, and I have been surprised by this, don't walk alone there as it is too isolated for them to feel safe, whereas Wenny Meadow is closer to dwellings.

A recent poll found that a good percentage of Chatteris residents felt that the Meadow should not be built on, but our Town Council seem unconcerned with what residents want. We already have allocated land for sufficient housing to meet national requirements, but they seem intent on destroying a valued local amenity. Why is that? One is forced to the conclusion that vested interests play a part here.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Maxim

Organisation:

Surname: Emmons

Comment **Object**

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I have read many of the reasons given for 40284 being unsuitable for and agree with the conclusions that building on it would be a travesty.

I am angry that Chatteris Local Council should consider ignoring the result of the poll that all Chatteris residents were free to partake in, and the result was 92% of voters agreed the area should remain as a Local Green Space. One can only lead to the view that certain councillors have personal vested interest in building housing on this site despite the wishes of local people.

I understand other more suitable spaces have been found which provide sufficient space to meet the demands of national house-building current needs.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Clare

Organisation:

Surname: Howard

Comment **Object**

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Title:

Position:

First Name: Victoria

Organisation:

Surname: Halmshaw

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Dan

Organisation:

Surname: Grannell

Comment **Object**

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Title: Mr

Position:

First Name: Colum

Organisation: Cambridgeshire County Council

Surname: Fitzsimons

Comment **Support**

The local plan Policy LP30 and LP31 would benefit from a supportive policy to encourage the provision of green space near older people’s housing. Walkable green spaces near the residences of older people aged 75+ significantly and positively influences five-year survival.

Appendix 5 – Open Space Standards would benefit from including other design features as part of the standard required for open space such as policy requirements to provide paths, drinking fountains, street furniture etc. within open/green spaces. These may be better addressed within design Supplementary Planning Documents rather than the Local Plan itself and public health would welcome the opportunity to work with Fenland District Council on this.

Despite mentioning “blue space” in paragraph 20 as part of the “doubling Nature” programme it has been included with the requirement for green space – both “blue” and green space are important environmental determinants of health and the need for blue space would be better served by have a separate policy or an exploration of the need for both blue and green space within an open space SPD.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Steven

Organisation:

Surname: Cassidy

Comment **Object**

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Title:

Position:

First Name: Ray

Organisation:

Surname: Taylor

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Sam

Organisation:

Surname: Ward

Comment **Object**

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Title:

Position:

First Name: Margaret

Organisation:

Surname: Ward

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Sandi

Organisation:

Surname: Christmas

Comment **Object**

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Title:

Position:

First Name: J

Organisation:

Surname: Bennett

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Edita

Organisation:

Surname: Gorelyte

Comment **Object**

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Title:

Position:

First Name: Ieva

Organisation:

Surname: Skieryste-Kalnikiene

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Liutauras

Organisation:

Surname: Puckorius

Comment **Object**

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Title:

Position:

First Name: Sabina

Organisation:

Surname: Lankute

Comment **Object**

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Title:

Position:

First Name: Kirsty

Organisation:

Surname: Patterson

Comment **Support**

I agree with the general principle of designating Local Green Spaces.

LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Steve

Organisation:

Surname: Reynolds

Comment **Object**

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Title: Mr

Position:

First Name: A J S

Organisation:

Surname: Cave

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:		Position:	
First Name:	Richard	Organisation:	
Surname:	Mandley		
Comment	Object		
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Title:		Position:	
First Name:	Andrew	Organisation:	
Surname:	Gudgeon		
Comment	Object		
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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Knud

Organisation:

Surname: Clemmensen

Comment **Object**

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Title:

Position:

First Name: Tobias

Organisation:

Surname: Harding

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title: Mrs **Position:**

First Name: L **Organisation:**

Surname: Ramnath

Comment **Object**

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Title: Mrs **Position:**

First Name: Lesley **Organisation:**

Surname: Gibbs

Comment **Support**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Colleen

Organisation:

Surname: Smith

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: Dorothy J

Organisation:

Surname: Ivory

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Samantha

Organisation:

Surname: Pearce

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title: Mrs

Position:

First Name: Jennifer

Organisation:

Surname: Mandley

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Katina

Organisation:

Surname: Harding

Comment **Object**

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Title:

Position:

First Name: Julia

Organisation:

Surname: Turner

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Deborah

Organisation:

Surname: Evans

Comment **Object**

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Title:

Position:

First Name: Robert

Organisation:

Surname: Moorhouse

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Colin

Organisation:

Surname: Brett

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: Jonathan

Organisation:

Surname: Derry

Comment **Object**

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I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Brian

Organisation:

Surname: Clarke

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title: Mrs

Position:

First Name: Susan

Organisation:

Surname: Newton

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

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

Comment **Object**

Policies LP30: Local Green Spaces and Other Open Spaces and LP31: Open Space and Recreational Facilities

Natural England supports these policies to protect and enhance local green spaces, recreational facilities and other open space as part of the district's wider green infrastructure. However, in the absence of a Green Infrastructure Strategy to illustrate these existing areas, and opportunities for delivering new and enhanced green infrastructure through Plan development, the policies are rather weak and meaningless.

We support the requirement within Policy LP31 for developers to mitigate the recreational pressure effects of new development on sensitive designated sites, through provision of alternative open space and other measures. However, the recreational pressure effects of Plan development should be addressed strategically through the Sustainability Appraisal (SA). The SA should identify prescriptive mitigation measures to address any adverse effects, to be delivered through robust Plan policies.

We welcome that protection and enhancement of Public Rights of Way is addressed through Policy LP21: Public Rights of Way and site allocation policies.

Title: **Position:**
First Name: Kirsty **Organisation:**
Surname: Merry

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could "endure" beyond the plan period.

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Gordon

Organisation:

Surname: Betts

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

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Title:

Position:

First Name: Anthony

Organisation:

Surname: Nottage

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Toma

Organisation:

Surname: Sarus

Comment **Object**

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Title:

Position:

First Name: Margot

Organisation:

Surname: Carson

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Elizabeth

Organisation:

Surname: Lee

Comment **Object**

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Title:

Position:

First Name: David

Organisation:

Surname: Hilliard

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Nicholas

Organisation:

Surname: Howard

Comment **Object**

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Title:

Position:

First Name: Katherine

Organisation:

Surname: O'Shea

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:		Position:	
First Name:	Robert	Organisation:	
Surname:	Mayes		
Comment	Object		
I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.			
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Title:		Position:	
First Name:	Sheila	Organisation:	
Surname:	Mayes		
Comment	Object		
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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Pamela

Organisation:

Surname: James

Comment **Object**

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Title:

Position:

First Name: Alison

Organisation:

Surname: Betts

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Brenda

Organisation:

Surname: Calvert

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.

Chatteris is deficient in all standards of Accessible Natural Green Space so this site is extremely important to local people. The site assessment says that Wenny Meadow meets the criteria for designation (in NPPF paragraph 102) due to its beauty, historic and recreational value, tranquility, and the amount and biodiversity of wildlife. The designation of the site as a Local Green Space received the support of 92% of voters in the Parish Poll on 7th June 2022 and the site received the most nominations for Local Green Space designation out of all sites in Fenland during the initial consultation.

Title:

Position:

First Name: Nick

Organisation:

Surname: Templey

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Irene

Organisation:

Surname: Dawson

Comment **Object**

I agree that Local Green Spaces should be identified and protected, in accordance with the National Planning Policy Framework.

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Title:

Position:

First Name: John

Organisation:

Surname: Dawson

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: Rolandas

Organisation:

Surname: Patravicius

Comment **Object**

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Title:

Position:

First Name: Laima

Organisation:

Surname: Asaciova

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name: G

Organisation:

Surname: Tuffs

Comment **Object**

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Title:

Position:

First Name: I J

Organisation:

Surname: Hargreaves

Comment **Object**

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:

Position:

First Name:

M

Organisation:

Surname:

Tuffs

Comment

Object

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Title:

Position:

First Name:

Fiona

Organisation:

Surname:

Bryan

Comment

Object

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LP30: Local Green Spaces and Other Existing Open Spaces

Title:		Position:	
First Name:	Lisa	Organisation:	
Surname:	Templey		
Comment	Object		
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I disagree with the decision that LGS 1 (Wenny Meadow) should not be designated as a Local Green Space in its entirety. I do not think that the small part that has been designated as Local Green Space in the draft plan is sufficient. This assessment seems to be at odds with the assessment of Site 40284, and it would seem more likely than not that the site could “endure” beyond the plan period.			
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<hr/>			

LP31: Open Space and Recreational Facilities

Title: **Position:**

First Name: P E **Organisation:**

Surname: Daniels

Comment **Support**

I support the need to identify and provide additional sports facilities for growing clubs in the area. As a former member of the armed forces I recognise the importance of sport both for physical and mental well being for residents and serving and ex-serving members of the armed forces who have chosen to settle in Fenland. Rugby in March through March Bears Rugby club is now facilitating teams of all ages in men’s, women’s and junior rugby categories. Also through rehabilitative walking rugby an opportunity is provided to either experience rugby for the first time or get back into the sport following health or mental issues, with the opportunity to move onto junior, senior or veteran (vets) rugby. This is also providing health and fitness benefits and social interaction. The growing interest in rugby is currently limited to the amount of space available at the club with only one pitch and one set of changing rooms available for use by 4 senior teams and 10 junior teams then this interest is in danger of being strangled before it has the chance to develop which would not only be a shame for the players of all ages, sexes and standards but also for the community as a whole.

Title: **Position:**

First Name: Joanne **Organisation:**

Surname: Anderson

Comment **Support**

I think it is vitally important to source new sites for recreational facilities as part of this plan. In particular there is an ever expanding rugby and athletics club with minimal facilities and no opportunities to grow. Yet they are so popular with team in all age ranges, walking sport, vet and ladies sections as well as normal rugby and runners placing in top spots and representing GB at the running club. Imagine what could be achieved if we could see these clubs acquire improved facilities.

Title: **Position:**

First Name: Kabir **Organisation:**

Surname: Birdl

Comment **Support**

I am 15 I have train at march bears for 3 years I am a member of the under 16 and I train twice a week I also play walking rugby twice a week and I feel due to the number of people that use march bears rugby club we would benefit with a larger site.

LP31: Open Space and Recreational Facilities

Title:

Position:

First Name: Adrian

Organisation:

Surname: Kershaw

Comment **Support**

I am a coach for the youth section at March Bears RUFC and coach U15 and U16 rugby twice a week, I am also an active member of the walking rugby sessions on a Monday and Friday and a member of the veterans team, we also have age grade rugby training from the age group of U5 to U17 plus training for ladies and girls teams which all have to use the same single pitch that the first XV train and play matches on, because of all this activity on one pitch I feel that the club needs extra pitches for training and matches for all ages and genders.

Title:

Position:

First Name: Erica

Organisation:

Surname: Kershaw

Comment **Support**

I'm a voleenter at March bears rugby club, I also help with taking money from tuck shop, cooked food and drinks. My husband teaches the under 15s and 16s group. In the 3 years we have been members of the March bears rugby club it has grown massively. Monday we have mixed walking rugby. Tue the first team and colts train Wed the under 14s under 15s under 16s train. Thurs is the first team and colts training. Fri we have walking rugby and ladies training Sat match first team or vets play. Sun the under 5s to under 17s train plus girls train. We share our club with football and athletic clubs. Due to the way the club has grown we seriously have a need for bigger training facilities. I feel the club not only benifits the physical health but also the mental health of its members.

Title:

Position:

First Name: Mark

Organisation:

Surname: Gordon

Comment **Support**

I support the need to identify and provide additional sports facilities for all the growing clubs in the area. Rugby in March now has teams of all ages as well as teams for children, Men, Women, Vets and Walking rugby and have outgrown their current facility and with increased interest they need more space or a substantial relocation.

LP31: Open Space and Recreational Facilities

Title:

Position:

First Name:Roman

Organisation:

Surname:Kiselovs

Comment

Support

I support the need to identify and provide additional sports facilities for growing clubs in the area. Rugby in March is now facilitating teams of all ages as well as men's, women's and vets as well as rehabilitative walking rugby but without space to grow they will not be able to continue to accommodate the growing interest which would be a shame.

Title:

Position:

First Name:Karen

Organisation:

Surname:Ellis

Comment

Support

I support the need to identify and provide additional sports facilities for growing clubs in the area. Rugby in March is now facilitating teams of all ages as well as men's, women's and vets as well as rehabilitative walking rugby but without space to grow they will not be able to continue to accommodate the growing interest which would be a shame.

Title:

Position:

First Name:Malcolm

Organisation:

Surname:Howard

Comment

Neutral

As a great sporting Nation, we should not let development push back the need for functional spaces for sport and recreational activities. Our nation should have the best sports represenatives from the entire country not just the areas that have made provision for the development of sport, The fens have the potential to provide the England team members of each sports disciplin in the the future if they are given the chance to grow locally. Give them that chance.

LP31: Open Space and Recreational Facilities

Title:

Position:

First Name: Danielle

Organisation:

Surname: Carley

Comment **Support**

March Bears Rugby Club is rapidly expanding and out growing their shared site on Elm Road. We have children from the age of 3 years through to a Veterans team all training and playing using the single pitch and small clubhouse. These facilities are now too small for the ever expanding club but unfortunately there seems to be no space for the rugby club to relocate or expand into. As March and the surrounding area expands, the demand for the rugby club will increase.

This need is hugely important for our rugby community, and as previously mentioned one pitch currently struggles to support....

- Cubs 3-5 years
- Minis 6-8 years
- Juniors 9-11 years
- Youth 12-17 years
- Mens teams 18+
- Ladies 18+
- Girls 11-18
- Vets team
- Walking rugby 16+

Title:

Position:

First Name: Owen

Organisation:

Surname:

Comment **Neutral**

Son plays childrens rugby for March Bears. The site is essentially one field that is shared for rugby and football. There is one pitch and a small clubhouse.

There is no designated smaller pitches or 2nd/3rd pitches for the various age groups that all require use of the field at the same time. Expansion, progress and development of childrens futures are being limited by lack of sporting facilities and infrastructure.

Title:

Position:

First Name: Ben

Organisation:

Surname: Carter

Comment **Support**

I support the need to identify and provide additional sports facilities for growing clubs in the area. March Rugby club now welcomes teams of all ages including men and womens and veterans along with rehabilitative walking rugby but with the lack of space there is a struggle to grow and gain the interest of potential players is a shame.

LP31: Open Space and Recreational Facilities

Title:		Position:	
First Name:	Lisa	Organisation:	
Surname:	Bulbeck		

Comment **Support**

I support the need to identify and provide additional sports facilities for growing clubs in the area.

Rugby in March is now facilitating teams of all ages as well as men's, women's and vets as well as rehabilitive walking rugby. The club has significantly increased in size but without space to grow they will not be able to continue to accommodate the growing interest which would be a shame. The site is shared between 3 organisations and there is a need for development and restoration.

Title:		Position:	
First Name:	Valerie	Organisation:	
Surname:	Lavender		

Comment **Support**

March Bears Rugby Club is thriving and with support can grow further. One such example would be to support the Rugby Club in their plight to move to a new site (one has been identified). The club's current site in Elm Road is shared, space is limited and the buildings are in need of investment. The club provides rugby training to all ages and abilities; from 3 years through to 70+, cubs, minis, juniors, youth, 18+ male (this team won promotion this year), girls under 18's, ladies (18+), veterans and walking rugby teams. All these teams have just one pitch on which to train and play. The club has regular attendees from surrounding villages and has been visited by people from outside of the area. The walking rugby has particularly attracted interest from afar from those keen to see the program in action with a view to creating similar sessions in their own area. Rugby is good for physical and mental health as well as social interaction. With support March Bears Rugby Club can grow further, at present it is somewhat restricted by the site, having just one pitch and a tired clubhouse in need of improvements. March Bears Rugby Club is very community based and run by dedicated volunteers, on top of the rugby training and games they find time to host family fun days, fundraisers and events attracting players and non-players. March Bears Rugby Club is deserving of the support of the council to continue to grow and provide activities for ALL for years to come.

Title:		Position:	
First Name:	Greg	Organisation:	
Surname:	Hanrahan		

Comment **Support**

I fully support the need to identify and provide additional sports facilities for the benefits of all in Fenland. There are a number of growing sporting clubs in the area and access for all is paramount. I am a member of march Rugby club, which has supported my mental health through the last few years, through sport and community. Rugby in march is now facilitating teams of all age groups as well as men's, women's vets and walking rugby. The latter is cross generational and is rehabilitative. There is insufficient space (one pitch) for the club to accommodate all members currently and further growth will put further pressure on facilities. it would be a shame for community enthusiasm to be dampened by the lack of facilities.

LP31: Open Space and Recreational Facilities

Title:		Position:		Development Planner			
First Name:		Katie		Organisation:		Persimmon East Midlands	
Surname:		Dowling					
Comment		Object					
<p>Persimmon Homes are in support of the policy as a whole however no calculation has been provided within the appendix to calculate children per household. The playground calculations should be provided in the same formula as other open spaces.</p>							

Title:		Position:			
First Name:		Dennis		Organisation:	
Surname:		Zemaitis			
Comment		Support			
<p>I support this because I have been in a local rugby club in March town for a year and we don't have much room to train because there is alot of people there. The club has grown and ill be happy for it to expand. Women's rugby is quickly growing in March and for all ages.</p>					

LP31: Open Space and Recreational Facilities

Title: Dr **Position:**

First Name: Eamonn **Organisation:**

Surname: Walsh

Comment **Support**

I want to make comment in relation to the situation March Bears Rugby Club find themselves, with particular reference to the poor provision of playing pitches, training facilities and associated changing rooms and leisure facilities.

The Club has the use of one pitch only at the Club site on the B1101 Elm Road leading out of town, yet many years ago we were

able to play on a pitch at the Neale Wade school and the Estover Road playing fields.

Those facilities are not available to us now, Estover Road has been taken over by Football pitches and the Rugby pitch has disappeared!

The Club has a burgeoning membership increasing year on year.

The youth sides ranging in year age groups from under 6s up to under 12s take over the field on Sunday morning with large numbers of parents coming to support the many volunteer coaches.

The Colts side and Senior side are very active in training and matches. The Veterans side has a number of matches a year and over the last 3 years Walking Rugby on Monday and Friday evenings regularly attracts 20 to 30 plus players. Between training and playing Matches the Pitch is used every day of the week when the 1st team is playing at home on Saturday or if there is a Veterans match or Charity match.

On Sunday morning the Club is alive with our young sections.

More recently a Women's team has been developing and training on Friday.

Because of all this activity the pitch gets excessive wear and at times the surface is poor.

The playing space the Club has available to accommodate this rapidly growing interest is not enough.

We at least need 2 pitches, 1 for training and 1 for playing.

In short as per the draft aims of Fenland District council in this area, we are Deficient in Playing space, we do not have sufficient open space and other facilities to meet our needs and we desperately need to improve the quality of our existing space to provide adequate facilities for the March Bears Ruby Club both now and for future generations.

I very much hope these comments will create support for the Club and help forge a path for improvement.

Title: **Position:**

First Name: Karl **Organisation:**

Surname: Pughsley

Comment **Support**

I support the need to identify and provide Additional sports facilities for growing clubs in the local area.

Rugby in March is growing and facilitating teams of all ages as well as mens, womens and vets as well as rehabilitative walking rugby.

Team sports are a vital source of keeping fit not only physically but also for your mental health.without space to grow they will not be able to accommodate the growing interest which would be a shame.

LP31: Open Space and Recreational Facilities

Title: Mr **Position:** Planning Manager

First Name: Philip **Organisation:** Sport England

Surname: Raiswell

Comment **Support**

This policy should protect both existing indoor and outdoor sports facilities, and seek new ones in locations where they are needed.

The Fenland Local Football Facilities Plan (2019) gives guidance on where investment in existing and proposed football facilities is needed, including improvements to existing sites.

Title: Mr **Position:**

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

Surname: Baker

Comment **Support**

The Wildlife Trust fully supports part D of this policy, though we suggest it might better sit within policy LP24 or LP29?

Title: **Position:**

First Name: Lynda **Organisation:**

Surname: Warth

Comment **Support**

This policy is to be supported and applied to earlier policies.

Title: Mr **Position:**

First Name: Andy **Organisation:** The Abbey Group Cambridgeshire Ltd

Surname: Brand

Comment **Object**

We consider that the threshold for on-site provision of public open space should be 50 units and that appropriate financial contributions towards a scheme within close proximity should be considered.

A development of 20 units will not generate a critical mass of population to warrant on site provision unless it is perhaps within a smaller order settlement. In Market Towns a 20 dwelling scheme should make, subject to viability, an appropriate financial contribution towards a larger strategic scheme. We are aware that there is political support for this within March.

The policy is at present not sound as it is not justified or effective as there is insufficient evidence to demonstrate that a 20 unit scheme would create a need for on-site public open space provision.

LP31: Open Space and Recreational Facilities

Title: **Position:** Senior Conservation Officer

First Name: Daniel **Organisation:** RSPB

Surname: Pullan

Comment **Support**

Policy LP31 Open Space and Recreational Facilities, p.102

Part D Designated Nature Sites – We support this policy wording to ensure recreational pressure is mitigated when this might adversely affect designated nature conservation sites.

Title: **Position:**

First Name: Paul and Belinda **Organisation:**

Surname: Clark

Comment **Object**

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A development of 20 units will not generate a critical mass of population to warrant on site provision unless it is perhaps within a smaller order settlement. In Market Towns a 20 dwelling scheme should make, subject to viability, an appropriate financial contribution towards a larger strategic scheme. We are aware that there is political support for this within March.

The policy is at present not sound as it is not justified or effective as there is insufficient evidence to demonstrate that a 20 unit scheme would create a need for on-site public open space provision.

Title: **Position:**

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

Surname: Fisher

Comment **Object**

We consider that the threshold for on-site provision of public open space should be 50 units and that appropriate financial contributions towards a scheme within close proximity should be considered.

A development of 20 units will not generate a critical mass of population to warrant on site provision unless it is perhaps within a smaller order settlement. In Market Towns a 20 dwelling scheme should make, subject to viability, an appropriate financial contribution towards a larger strategic scheme. We are aware that there is political support for this within March.

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LP31: Open Space and Recreational Facilities

Title:

Position:

First Name: Susie

Organisation: St John's College Cambridge

Surname: Wood

Comment

Object

Object (due to lack of clarity/justification). It is not clear how the proposed open space requirements in Appendix 5 have been arrived at. The Council's 'Open Space Study 2022' is referenced but is not in the Local Plan Document Library. There is an 'Open Space Survey' listed but no link is provided.

The use of average household numbers (stated to be 2.32 persons per household in Fenland) and requirements per 1,000 population for calculating open space is well established. The proposed use of "per child" as the requirement for Neighbourhood Playgrounds is not appropriate as it is not clear how this would be calculated.

Title:

Position:

First Name:

Organisation: Barratt and David Wilson Homes Cambri

Surname:

Comment

Object

In principle the provision of proper space standards is supported. However, the quantum sought is too great considering the viability context of Fenland. Peterborough is a good comparison to Fenland in terms of viability. Peterborough seek far less open space than is currently mooted - 2.11ha per 1000 population whilst Fenland is seeking 3.25ha per 1000 population plus 12sqm per child for play. 1.8ha natural green space in addition to 0.34ha informal green space is also considered to be excessive.

We would also question the approach taken to calculating 'neighbourhood playgrounds' areas. The standard proposed is 12 sqm per child but Appendix 5 contains no information on the average number of children per household (an average number of persons in a Fenland household is provided – 2.32 – but not for children. It is considered more appropriate to, calculate per 1000 population as elsewhere.

Part B covers playing pitches and will be seeking contributions based on Sport England's calculator but sets no threshold for when the policy applies.

Part C sets out that all development of 20 or more dwellings will need to contribute to the provision of off-site strategic indoor sports and recreation facilities. Additionally it is set out that, for sites of 20 or more dwellings, a S106 planning obligation will be used to secure on-site or off-site delivery, with the precise contribution being negotiated on a case-by-case basis. This is contradictory. It also gives little to no certainty when looking at site viability as to whether or not on-site provision will be required. No details are provided in Appendix 5 as to how the requirement will be graduated (usually per 1000 population).

LP31: Open Space and Recreational Facilities

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

Comment Object

Policies LP30: Local Green Spaces and Other Open Spaces and LP31: Open Space and Recreational Facilities

Natural England supports these policies to protect and enhance local green spaces, recreational facilities and other open space as part of the district’s wider green infrastructure. However, in the absence of a Green Infrastructure Strategy to illustrate these existing areas, and opportunities for delivering new and enhanced green infrastructure through Plan development, the policies are rather weak and meaningless.

We support the requirement within Policy LP31 for developers to mitigate the recreational pressure effects of new development on sensitive designated sites, through provision of alternative open space and other measures. However, the recreational pressure effects of Plan development should be addressed strategically through the Sustainability Appraisal (SA). The SA should identify prescriptive mitigation measures to address any adverse effects, to be delivered through robust Plan policies.

We welcome that protection and enhancement of Public Rights of Way is addressed through Policy LP21: Public Rights of Way and site allocation policies.

Title:		Position:	
First Name:	Jackie	Organisation:	
Surname:	Drawbridge		

Comment Support

I support the need for additional designated sports facilities for March in line with its rapid growth in population. As it stands there are not sufficient open space sports areas with associated facilities to meet the population with groups having to share the limited resources we have. Taking March Bears Rugby Club as an example, they are a hugely thriving club with groups from 4 years to adult including ladies and walking sport but an improvement in facilities and ground area could allow the club to develop even further.

21: Flood and Water Management

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

Comment **Neutral**

Response on behalf of:

Middle Level Commissioners, Benwick IDB, Curf and Wimblington Combined IDB, Euximoor IDB, Hundred of Wisbech IDB, Hundred Foot Washes IDB, Manea & Welney DDC, March East IDB, March Third DDC, March Fifth DDC, March Sixth DDC, March West & White Fen IDB, Needham & Laddus IDB, Nightlayers IDB, Ransonmoor DDC, Sutton & Mepal IDB, Upwell IDB, Waldersey IDB, Warboys, Somersham & Pidley IDB + Whittlesey & District IDB

Thank you for your e-mail dated 25th August in respect of the above.

The opportunity for the Commissioners and Boards listed above to comment upon and contribute to the Local Plan document is welcomed.

The draft document has been considered and the following comments are made:

A. General Comment

1. Risk Management Authorities (RMA)

a. The Middle Level Commissioners (the Commissioners) are a statutory water level and flood risk management and navigation authority responsible for the maintenance of major watercourses within their catchment.

B. In addition to their statutory role, the Commissioners provide a planning consultancy service to the Internal Drainage Boards (the Boards) within and adjacent to their area. The Boards are autonomous water level and flood risk management authorities that obtain support from the Commissioners' staff and supervise drainage at a more local level.

C. The Commissioners and associated Boards are Risk Management Authorities (RMA), as identified by Defra.

D. Together with the County, your and other District Councils and other stakeholders, the Commissioners and associated Boards are members of the Cambridgeshire & Peterborough Flood and Water {FLoW} Partnership. As members of this partnership issues which generally promote improved water level and reduce flood risk on our particular systems in accordance with the respective policy statement are encouraged.

E. The Boards for whom the Commissioners provide a planning consultancy service within your Council's area are listed above and are referred to as the "associated Boards" in the following text.

2. The Land Drainage Act and relevant RMA Byelaws

Please be advised that:

a. All the RMA's primary powers are under the Land Drainage Act (LOA) 1991 and its Byelaws, policy statements and other relevant documentation, but sections of the Water Industry Act 1991, the Highways Act 1980 and the Flood & Water Management Act (FWMA) are also relevant.

B. The content of the Middle Level Act 2018 applies to the Commissioners' navigable watercourses only.

C. 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.

21: Flood and Water Management

3. Middle Level System River Management Scheme

Previous strategic studies confirmed the continuing need for management of assets and associated watercourses in the Middle Level catchment. Following the completion of the replacement Pumping Station at St Germans in 2010 a decision was taken by the Commissioners to undertake a condition survey of its raised embankments.

The current arrangements protect 8,516 households, alongside 1,643 commercial and industrial properties and 56,658ha of agricultural land from permanent flooding. A further 4,659 households, 1,197 commercial and industrial properties, with 47,727ha are at further risk from infrequent flooding along with critical infrastructure such as strategic road links, motorways, gas pipelines, railway lines (East Coast Main Line), power generation facilities (predominantly wind and solar farms) and a prison.

More recently the Strategic Study has been "refreshed" to address subsequent issues, such as the raised embankment survey data together with changes in legislation, climate change guidance, methods of analysis and improvements made to the Commissioners' system including the replacement of St Germans Pumping Station.

A flood defence scheme was prepared which was submitted to and subsequently received Grant in Aid (GiA) from the Environment Agency.

A strategic appraisal examined the implementation of system wide options required to maintain and improve the Commissioners' river network including increased channel capacity (dredging) and creation of formal flood storage areas. These options are also optimised within the economic appraisal to determine the most economic standard of flood risk management. This appraisal has concluded that a system wide standard of 1.5% (1 in 66 year) AEP is the most economic and environmentally acceptable standard of flood risk management across the Middle Level main river network.

The scheme is in accordance with the current Fens Flood Risk Management (FRM) Tactical Plans, part of the Future Fens FRM Strategy being developed in partnership between the Environment Agency and RMAs (including the Commissioners and associated Boards) and contributes to the National Flood and Coastal Erosion Risk Management (FCERM) Strategy measure 1.5.4.

The delivery of the scheme is within the Agency's current six year spending programme with main construction work planned to commence in April 2023 and will contribute to the delivery of the programme target to better protect homes, property and infrastructure by March 2027.

The Middle Level Commissioners and associated Boards, as listed above, look forward to further involvement, discussion and consultation as the Local Plan emerges.

LP32: Flood and Water Management

Title:	Mr	Position:	
First Name:	Colum	Organisation:	Cambridgeshire County Council
Surname:	Fitzsimons		
Comment	Support		
Part A			

It is encouraging to see this policy includes all sources of flood risk rather than just river (fluvial) as outlined in the most recent iteration of the Planning Practice Guidance (PPG).

However, in respect of the requirement for a site-specific flood risk assessment, it is recommended that the wording is strengthened to match the wording of the national PPG. It should be specified that flood risk assessments will be required for minor developments meeting the criteria. The cumulative impact of minor development can often have a greater impact on flood risk than single major developments.

It is positive to see the requirement for SuDS on major developments but ideally the policy would go further in requiring SuDS for all developments where feasible.

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

LP 32 needs amending. Part A, d. should indicate that the preference for any SuDS maintenance will be preferred by a public body such as the Internal Drainage Boards. Also concerned that development is restricted by Flood Zones by the Environment Agency, which do not reflect flooding experienced in local areas. An example is that much of the flooding that occurs in Parson Drove is along Main Road, in Flood Zone 1. This is due to poor maintenance by the County Council over decades. Therefore, greater weight should be placed on local knowledge such as that of IDB's and Parish Council. The assessment used on sites allocated in the draft plan has resulted in allocations for Parson Drove at inappropriate locations, whereas other sites in the village envelopment have not been taken forward due to Flood Zone 2 & 3 labelling, that does not reflect local experience. Therefore a policy should be developed that allows development in preferred sites of the Parish Council, but on condition that flood alleviation measures are included with the development. This would follow the current process of development in flood zones 2 & 3, where the sequential test has been passed.

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

Flood Zones - Flood Zone Maps advised by the Environment Agency are out of date and don't factor in the alleviation measures the drainage boards put in place and the local knowledge of the Parish Council.

LP32: Flood and Water Management

Title:		Position:	
First Name:	Sarah	Organisation:	Norfolk County Council - Lead Local Floo
Surname:	Luff		

Comment Support

Lead Local Flood Authority (LLFA):

The area falls under a cross catchment zone between Cambridgeshire County Council and Norfolk County Council, both respective LLFAs for their regions. The areas of focus for the Norfolk County Council LLFA are the market town of Wisbech and the few other allocated sites along the border of Fenland District and King's Lynn and West Norfolk District. The following comments/advice have been drawn from the information provided:

- Norfolk LLFA welcome the inclusion of a policy covering Flood and Water Management which includes requirements for sequential tests, site-specific flood risk assessments, incorporation of SuDS, and consideration of ongoing maintenance, management and adoption.
 - Norfolk LLFA welcome the reference made to the Fenland Level 1 Strategic Flood Risk Assessment which was published in 2022.
 - Where sites lie close to the border between Fenland District and King's Lynn and West Norfolk District, plans must demonstrate engagement with relevant agencies including Norfolk LLFA.
- Norfolk LLFA provided comments in response to consultation on the Fenland Local Plan Issues and Options (Reg 18) document in 2019. Comments below are re-iterated:
- Development must not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources. In turn, development must have a neutral or positive impact on surface water drainage, whereby greenfield runoff rates must be set as a minimum standard for drainage strategies.
 - Development must consider the impact of highway expansion in connection with the proposed residential development. Road networks must be included into any future drainage strategy and demonstrate clear storage and capacity to cope with surface water runoff.
 - With reference to the overall development plan, we would request comment on how, in the future, any subsequent application for different phases of development considers how sustainable drainage relates to the surface water drainage strategy for the whole site. In particular, highlighting where different 'phases' rely on each other for the disposal of surface water, how this will be implemented during construction and operation of the development.
 - As an LLFA we would require any drainage scheme and storage features for a proposed development to add in an allowance for future urbanisation. This 'Urban Creep' allowance is dependent on the residential development density and is replicated in Table 4 of Norfolk LLFA Guidance which is available at: <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

Title:	Mr	Position:	
First Name:	Martin	Organisation:	Wildlife Trust for Bedfordshire, Cambrid
Surname:	Baker		

Comment Support

The Wildlife Trust supports this policy and the inclusion of a water efficiency standard, though whether this will be sufficient with the water resource challenges that Cambridgeshire faces is open to question.

LP32: Flood and Water Management

Title:		Position:	
First Name:	Steve	Organisation:	
Surname:	Cornell		
Comment	Neutral		
The document does not refer to the new reservoir near Chatteris proposed by Anglian Water. This will be a major development for Fenland and will offer many opportunities for leisure pursuits etc. Will the plan be amended to include this? Again there seems to be a lack of joined up thinking.			
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LP32: Flood and Water Management

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

Comment Support

We welcome the inclusion of Policy LP33 (Development on Land Affected by Contamination) and the reference to the Environment Agency's Land contamination risk management (LCRM) guidance.

We also welcome Policy LP32 (Flood and Water Management), noting it references Cambridgeshire Flood and Water Supplementary Planning Document (2016) and that Part B states that development should not adversely affect surface and ground water quality.

With regards to the above policies, we recommend adding reference to the Groundwater protection pages on gov.uk. These are a key reference for LPAs, developers and landowners. The collection, including the Groundwater Protection Position Statements, sets out our approach to groundwater protection and management and what we want others to do. It describes the legal framework we work within and the approaches and positions we take to regulate and influence certain activities and issues, including specific activities considered to present a particularly high risk to groundwater. Groundwater Protection Position Statements G1 to G13 are of particular relevance to Policy LP32.

Environmental Setting (Groundwater Vulnerability and Sensitivity)

Much of the Fenland District Council (FDC) area lies on bedrock unproductive strata, with some secondary aquifers in the form of sand and gravel superficial deposits to the east of Chatteris and around Whittlesey and March. Secondary aquifers provide an important local groundwater resource and base flow to our surface waters. These deposits support a number of agricultural licensed abstractions, particularly around Chatteris and Whittlesey. There are no groundwater source protection zones (SPZ) within the FDC area, meaning that there are no catchments of groundwater abstractions used for licenced public water supply in the area. FDC should check their records to identify any private (non-licenced) domestic supplies in the area.

General Background

The consideration of land contamination, protection and enhancement of controlled waters via the planning regime has always been a key material consideration. However, in many instances consideration of land contamination and controlled waters at planning stage is too late. Groundwater in particular, is not a boundary issue and ensuring an area wide holistic approach when considering such a valuable resource is much more effective at strategic 'design' stage.

New activities need to be deterred in certain areas based on their intrinsic hazard to groundwater. The hazard may result from a combination of the activity type, its duration and the potential for failure of controls. Close to sensitive receptors a precautionary approach is likely to be taken even where the risk of failure is low, the consequences may be serious or irreversible. We will apply a risk-based regulation approach.

Government planning policy as set out in the National Planning Policy Framework (NPPF) states that local policies and decisions should ensure that new development is appropriate for its location, having regard to the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development (paragraph 185).

The NPPF (paragraph 183) states that decisions should ensure that the site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. The local planning authority should therefore satisfy itself that the potential for contamination and any risks arising are properly assessed and that the development incorporates any necessary remediation and subsequent management measures to deal with unacceptable risks, including those covered by Part IIA of the EPA 1990. Intending developers should be able to assure local planning authorities they have the expertise, or access to it, to make such assessments.

Permitted, licensed and historic landfills are known to be present within the FDC area. Development on top of or within 50 metres of any permitted landfill site that accepted hazardous or non-hazardous waste should be considered very carefully. Risk assessed mitigation is likely to be required within 250 metres of a gassing landfill. Local Authorities

LP32: Flood and Water Management

should also consider the risks from historic older gassing landfills without a current Environment Agency permit.

We promote the redevelopment of Brownfield sites where possible. Where development is proposed on a site which is known or has the potential to be affected by contamination, a preliminary risk assessment should be undertaken. As stated in the draft plan, preliminary assessments, and any subsequent additional information should be carried out in accordance with the Environment Agency's Land contamination risk management (LCRM) guidance.

Soakaways and other infiltration Sustainable Drainage Systems (SuDS) need to meet the criteria in our Groundwater Protection Position Statements G1 and G9 to G13. They must not be constructed in contaminated ground where they could re-mobilise any pre-existing contamination and result in pollution of groundwater. We do not consider deep infiltration systems (>2.0m below ground level) to be routinely acceptable. All infiltration SuDS require a minimum of 1.2m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. Drainage systems should be constructed in line with good practice and guidance documents, incorporating appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.

Water Quality and Resources

Policy LP 32: Flood and Water Management contains multiple crucial environmental planning considerations within one policy. While we acknowledge the benefits of a holistic approach to flood and water management, we consider that separating Part A: Flood Risk and Part B: Water Quality and Efficiency into two policies would ensure that each matter is given sufficient weight in planning application decision making. This section of our comments refers exclusively to Part B: Water Quality and Efficiency.

Water Quality

Part B: b)

The Policy is not very prescriptive about what 'contributes positively', 'where possible' or 'adversely affect' mean in practice. Reference to Water Framework Directive (WFD) Regulation obligations and Biodiversity Net Gain in the text would be helpful. At present there is no reference to river water quality in the text. Additional specific examples would be useful – foul drainage from the development should not lead to an increase in the duration or frequency of Combined Sewage Overflow spills in the downstream sewerage network, the increase in discharge rate from the receiving Water Recycling Centre (WRC) should not result in a deterioration in downstream river quality. Clarification as to how the Policy requirements can be demonstrated would also be helpful here - reference to the Water Cycle Study (WCS) conclusions for a development site, for instance, or for unallocated sites not assessed in the WCS, a similar level of evidence should be provided.

Part B: c)

This could be strengthened in the text to require applications to include confirmation from Anglian Water of adequate foul water treatment capacity– and where appropriate that any necessary upgrades can be delivered ahead of occupation.

Part B: d)

We support part d), but suggest that the policy is re-written to clarify the distinction between new connections of clean surface water and those of foul water. Connections of new foul drainage will need to be made into the existing combined sewer. As well as ensuring there is no detriment to existing sewer users, there must also be no detriment to the local water environment. As above, applications should include confirmation from Anglian Water that this requirement can be met ahead of occupation. This would generally take the form of an AWS Pre-application enquiry response or other correspondence.

The Fenland Water Cycle Study has some useful recommendations that could be utilised in the Local Plan document:

Where water quality has the potential to be a significant planning concern an applicant should be able to explain how

LP32: Flood and Water Management

the proposed development would affect a relevant water body in a river basin management plan and how they propose to mitigate the impacts. Applicants should provide sufficient information for the local planning authority to be able to identify the likely impacts on water quality. The information supplied should be proportionate to the nature and scale of development proposed and the level of concern about water quality.

In those cases where it is likely that a proposal would have a significant adverse impact on water quality then a more detailed assessment will be required, alongside liaison with the water company. The water company will assess whether there is sufficient capacity within the existing infrastructure to accommodate foul flows from the site and within the sewerage catchment.

If there is insufficient capacity to accommodate foul flows, then a detailed site wide Foul Water Drainage Strategy shall be submitted to and agreed in writing by the local planning authority. The strategy should include the phasing of such works.

The assessment and drainage strategy should form part of the environmental statement if one is required because of a likely significant effect on water.

Development which may require further assessment includes, but is not limited to (Ref. 3):

- Development within 20 metres of a watercourse where changes are proposed to the channel or bank form or where the long-term management of the watercourse would be affected;
- Development requiring EIA for reasons linked to the water environment;
- Where WRC capacity is at or close to permitted DWF capacity;
- New water infrastructure; and
- Developments on contaminated land

Water Resources

We support the inclusion of Policy LP32: Flood and Water Management, and the requirements set out in Part B: Water Quality and Efficiency.

We agree that proposals must demonstrate that water is available to support the development and recommend they should not be approved unless there is a secure long term water supply to support them. However, limiting the scale of the assessment to the individual development sites will not allow for a cumulative assessment on water supply, which would need to be undertaken at the company /regional scale. The proposed growth in the Fenland district area needs to be considered as a whole and in combination with other growth pressures being placed on Anglian Water. This needs to include setting out how the growth is captured in the Water Resources East regional water plan, which will identify the combined additional demand on the region's companies and what new supply options (and their timescales) are required to maintain sustainable supplies.

We recommend the local plan also stipulates that water is available to support all planned development across the local plan area and that the impact of growth as a whole on Anglian Water's supplies is assessed and not just limited to individual pockets of development.

Water companies are obliged to produce water resources management plans (WRMPs) every 5 years, with the current plans, published in 2019, setting out how the companies will maintain customer supplies over the period 2020-2045. The regulatory assessments show which companies have been identified as having sufficient supplies, within present legislation, to meet growth. They also show any strategic schemes that are needed to achieve this, along with reducing demands and leakage.

Section 21.11 of the draft local plan references Anglian Water's 2019 WRMP and states that 'Increasing demands from growth, along with reductions in abstraction to improve the quality of the water environment, could result in an imbalance between supply and demand'. Whilst this is true, it should be recognised that a draft update to the company's WRMP is about to be published in autumn 2022, with the final plan expected in 2024. Advice should be sought from Anglian Water on how accurate the 2019 WRMP is and whether previous advice on sustainability of supplies should now be updated for use in long term planning. We would advise extreme caution in using the figures

LP32: Flood and Water Management

quoted in the 2019 WRMP unless they are demonstrated to still be relevant in the context of the company's forthcoming 2024 WRMP.

We have previously identified in the 2015 Anglian Region River Basin Management Plan (RBMP) that current levels of water abstraction are causing, or risk causing, environmental damage in various river catchments across East Anglia and measures have been identified in the RBMP to address this. These measures have been allocated to the water companies for delivery through the Water Industry National Environment Programme for the period 2020-25. It is possible that further measures will be required, including additional licence reductions, to ensure that the required flow recovery is sustained. Therefore, any surplus in water companies' current WRMP is subject to further consideration of whether it can be taken without causing environmental deterioration.

Given the pressure water resources face in the Fenland area we cannot rule out future further reductions in the supplies available to Anglian Water to prevent deterioration of the water related ecology. Any resultant loss in available supplies will need to be addressed in the company's next WRMP, but it needs to be noted that replacement supplies are likely to require strategic supply options (for example reservoirs and long-distance transfers) that could have significant delivery times.

We expect future WRMPs and local plans to be more sustainable for abstraction and on that basis, it is likely that additional planned growth, or unplanned growth, needs to be supplied with alternative sustainable sources, or reliably mitigated against, whilst such alternatives are being developed and tested for climate resilience.

We recommend any proposed development considers water resources as a key issue and the council recognises the damage of long term increases in abstraction due to growth. We do not support development that will result in increased rates of water abstraction from surface and groundwater bodies where it will cause deterioration in the environment or compromise the measures being taken to move to more sustainable levels of abstraction.

You will need to capture the wider growth cumulative assessment and outputs from WRMP24 into a detailed Water Cycle Study and ensure this informs the spatial strategy of the plan and the timing and delivery of development so that it matches the water companies water infrastructure trajectories. As we can only support sustainable development based on a Water Resources Management Plan that can provide the supplies needed without deterioration to waterbodies.

When considering a large development, where questions around water supply are raised, we advise the LPA to give due consideration to water resource challenges in this area.

We highly endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered vital as part of new developments. We also support environmental design principles when constructing new developments, these include but are not limited to;

- Protect existing natural environment assets including green and blue infrastructure.
- Restore and enhance local and regional natural systems to increase climate resilience and carbon capture.
- Establish a network of green and open spaces that create benefits for the whole community.

All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations &c. (Amendment) Regulations 2015. We support the stipulation in the draft local plan that the optional standard of 110 litres per person per day is adopted across the Fenland district area for new developments. Due to the pressures on local water resources and the potential risk of deterioration as a result of increased levels of abstraction, we would advise that any new development in the area aims for the highest levels of water efficiency.

Waste

Waste facilities can impact local communities through amenity issues such as noise, odour and dust. While the Environmental Permitting Regulations can minimise these impacts they are not sufficient to negate all impacts.

LP32: Flood and Water Management

Additional methods should be considered in your Local Plan policies. We would also recommend that any new housing allocations are located away from waste disposal and treatment facilities wherever possible to minimise impacts on new communities. Where this is not possible, we would support policies that include buffers between existing waste facilities and new residential site allocations.

Given some current high-profile issues with a waste operation at Saxon Pit Whittlesey, we recommend that consideration is given to a policy in relation to both the former Saxon Pit brickworks site and the associated permit to Johnsons Aggregates & Recycling Ltd at Saxon Pit in January 2022. The operator accepts and processes 250,000t of Incinerator Bottom Ash (IBA). Both these operations have attracted significant interest and we receive daily concerns associated with noise, odour and dust.

Title:	Mrs	Position:	
First Name:	J	Organisation:	Chatteris Town Council
Surname:	Melton		
Comment	Neutral		
Members also wish to know why the large reservoir being proposed by Anglian Water in Fenland is not shown on the Local Plan as this will have a major impact on Chatteris.			

LP32: Flood and Water Management

Title:		Position:	Sustainable Places Planning Adviser - Ea
First Name:	Andrew	Organisation:	Environment Agency
Surname:	Thornton		
Comment	Neutral		
Flood and Water Management (p. 103)			

Please note that the Planning Practice Guidance (PPG) on flood risk and coastal change has recently been updated; this section of the local plan should be reviewed in light of this to ensure the Local Plan is sound. For example, Policy LP32 should be updated to reflect these changes.

In paragraph 21.4, there is no mention of the residual risk of flooding in the event of a breach or overtopping of main river flood defences, which is an important consideration in Fenland district.

Paragraph 21.5 needs to be stronger and recognise the challenge that arises from the reliance on flood defence infrastructure. We recommend that reference is made to the Future Fens Flood Risk Management Baseline Report, which provides an overview of existing flood risk and future challenges in the Fens; this is available at: Future Fens - Flood Risk Management - Association of Drainage Authorities (ada.org.uk). Reference should also be made to the need to take an adaptive approach to Flood Risk Management into the future and to consider how the fens can be resilient to climate change into the future and a reference to working with other RMAs to explore this.

This section should also include reference to the Future Fens Integrated Adaptation Programme (FF:IA) (Future Fens: Integrated Adaption (anglianwater.co.uk)) and its role in exploring the importance of an integrated approach to water across the Fens.

Policy LP 32: Flood and Water Management contains multiple crucial environmental planning considerations within one policy. While we acknowledge the benefits of a holistic approach to flood and water management, we consider that separating Part A: Flood Risk and Part B: Water Quality and Efficiency into two policies would ensure that each matter is given sufficient weight in planning application decision making. This section of our comments refers exclusively to Part A: Flood Risk. Expanding LP32 will make it more relevant to the specific flood risk issues that need to be considered in Fenland. In addition, any recommendations from the Level 1 and Level 2 SFRA should be incorporated into this policy.

The first sentence should be expanded to make it clear that all sources of flood risk and the impacts of climate should be considered in the application of a sequential approach to flood risk management. Given that a large part of the district is in Flood Zone 3, residual risks should also be considered in the application of the sequential test. We recommend that the following wording is used: "Development proposals should adopt a sequential approach to flood risk management, taking into account all sources of flood risk and the impacts of climate change, including residual risks, the requirements of the NPPF...".

Please note that the Cambridgeshire Flood and Water SPD, which is referred to in policy LP32, may need to be reviewed and updated to take into account the revised PPG on flood risk and coastal change.

Policy LP32 should clarify that a site-specific FRA will be required where there is a residual risk of flooding in the event of a breach or overtopping of any main river flood defences (even if the site is in Flood Zone 1). Reference should be made to the Level 2 SFRA, which should include detailed information on residual flood risk.

Paragraph 42 of the PPG states: 'Where necessary, local planning authorities should use information on identified residual risk to state in strategic policies their preferred mitigation strategy for ensuring development will be safe throughout its lifetime'. This could include ensuring that no sleeping accommodation is permitted at ground floor level where there is a risk of internal flooding, ensuring that adequate flood resistant and resilient measures are incorporated and provision of safe internal refuge.

We strongly recommend that policy LP32 includes some clear guidance on what any windfall developments in areas of residual risk will need to demonstrate in order to pass both parts of the Exception Test. With regard to the second part of the Exception Test, it should be clarified what mitigation measures will need to be included in any residential

LP32: Flood and Water Management

development to ensure the development will be safe for its lifetime. This would help ensure that FRAs submitted as part of planning applications are acceptable. We would be happy to assist in producing guidance on appropriate flood risk mitigation measures in areas of residual risk from main rivers. We recommend that you review policy DM21 of the Kings Lynn & West Norfolk Site Allocations and Development Management Plan, which includes reference to flood risk design guidance relating to residential development in areas at residual risk of flooding.

Section 5.3 of the Level 1 SFRA recommends that safe access and egress to a locally identified refuge area will need to be demonstrated at all development sites in flood risk areas and flood warning and evacuation plans should be prepared for those areas known to be at risk of flooding. These recommendations should be incorporated into policy LP32, with a particular focus on rapid inundation areas.

We strongly recommend that this policy includes a sentence that safeguards the area of land designated as Flood Zone 3b in the Level 1 SFRA from further development as this land is required for current and future flood risk management. There may be other areas of land in proximity to flood defences that need to be safeguarded from development where this land is needed for future flood risk management purposes.

Although we are pleased to see this policy states that SuDS will be required for all major development, we recommend clarifying that there must be no increase in surface water run-off as a result of new development to ensure there will be no increase in flood risk elsewhere. We also consider that reference should be made to seeking opportunities to reduce the causes and impacts of flooding through the use of SuDS, as set out in paragraph 63 of the PPG on flood risk and coastal change. The policy could also encourage developers to achieve multiple benefits through SuDS, such as improved water quality and biodiversity.

LP32: Flood and Water Management

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

a. It is disappointing to note that most of the contents of Part (B) Flood Risk and Drainage of Policy LP14 – Responding to Climate Change and Managing the Risk of Flooding in Fenland within the current Local Plan have not been included in this policy contained within the draft Local Plan 2021-2040.

It is considered that the new policy is much weaker which is disappointing given the special water level and flood risk management requirements within the Fens.

b. The Commissioners and associated Boards generally agree and acknowledge that SUDS are the preferred option in certain situations. However, they are not always the answer to the problem and not always the most suitable solution. Careful consideration needs to be given to the facility to be used, what is trying to be achieved and the nature of the water level management system in the area. The long term ownership, maintenance and funding is also an issue and adequate arrangements must be made to ensure the long-term ownership funding, management and maintenance arrangements for the upkeep of any water level and flood risk management system, whether on or off site, in perpetuity. These requirements may be in addition to those imposed by planning conditions or required by the LLFA and that details of the works to be carried out by the occupier/land owner, adopting authority, the Management Company or other responsible person/authority, together with the costs attached, are included in the “Owners Pack” and the Deed of Sale.

c. The piecemeal development encountered within your Councils area, for example, along Upwell Road in March or the Bridge Lane area in Wimblington, is resulting in many small and isolated attenuation systems which will be difficult to maintain and will be a future liability for the parties concerned, the failure of which could potentially increase flood risk. The Commissioners and associated Boards would prefer more holistic solutions to be utilised such as the pond excavated by Hutchinson’s in conjunction with the Hundred of Wisbech IDB which will serve several developments in the area close to the A47/Cromwell Road junction.

d. No reference is made to the many RMA and other stakeholders involved in this sector.

LP32: Flood and Water Management

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

Comment	Object
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We are very surprised not to see a specific policy or sub-section of policy around surface water management on new developments, particularly given the prevalence of surface water flooding in Fenland. Part B is the closest to this but is not specific in its title and it needs to be strengthened quite significantly to match the NPPF, PPG and Flood and Water SPD.

The policy does not include any requirements around limiting surface water discharge rates and volumes to pre-development rates, nor does it include requirements for surface water attenuation.

The drainage hierarchy laid out in the policy does not include rainwater harvesting/reuse as the first element but instead skips straight to infiltration into the ground. This should be updated, particularly given the likely increase in frequency of drought situations where water supply on a wider level could become a problem.

We would like to see the policy explicitly state that surface water must be treated and cleansed in line with national standards before being discharged from the site. This will reduce the risk of developers discharging unclean or polluted water into local watercourse systems.

There should be consideration of other organisations involved in surface water management in Fenland such as Internal Drainage Boards (IDBs). IDBs have specific bylaws associated with their systems and are integral to the overall management of flood risk in the area.

Riparian ownership and existing drainage infrastructure needs to be considered as part of this policy. Fenland is characterised by the presence of many ditches and watercourses that are essential to flood risk management and these must be preserved through development. Development should not create additional riparian owners through building adjacent to watercourses and thus sub-dividing the ownership. This can have significant implications on watercourse management and subsequently flood risk.

Overall this policy requires less from developments than previous policies contained within Fenland's local plans which is disappointing.

Additionally, where reference is made to 'Cambridgeshire Flood and Water SPD' I note there is reference to the current 2016 revision. In the event this is updated (which is planned to happen over the next 12-24 months) this should include a statement such as "or any subsequent revision" to cover future versions of this document under the Local Plan.

LP32: Flood and Water Management

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

These representations are accompanied by Flood Risk and Drainage Report. The Report acknowledges that the Site is situated within Flood Zone 3 but benefitting from flood defences.

The possibility of flooding from all forms of flooding plus the potential for wider impacts as a result of development have been considered. Reflecting these constraints and the Illustrative masterplan, a initial Drainage Strategy has been prepared to illustrate how drainage on the site could be sustainably and successfully achieved.

The investigations carried out as part of the flood risk assessment and flood risk management measures proposed demonstrates that future development of the site would be safe, without increasing flood risk elsewhere.

LP32: Flood and Water Management

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

Comment **Neutral**

Flood Risk

Para. 21.7 - We support the reference to the incorporation of sustainable drainage systems (SuDS) at the design stage, and welcome the policy changes in relation to comments made in our previous representation to the Local Plan regarding surface water connections to the public sewerage network should only be provided in exceptional circumstances with applicants providing evidence of having followed the surface water hierarchy (utilising methods as high as possible within hierarchy which should include water re-use before infiltration). We would advocate the Local Plan encouraging nature-based solutions when designing SuDS that will also assist with enhancing biodiversity and delivering biodiversity net gain.

Water quality and efficiency:

Para. 21.10 - We would welcome reference here to the Future Fens: Integrated Approach project, as the strategic outcomes are aligned with an integrated water management solution that seeks to address adaptation and resilience to drought and flooding exacerbated by climate change impacts, whilst enabling sustainable economic growth alongside nature recovery.

Para. 21.11 - We support the reference to our current WRMP19 (Water Resources Management Plan) which identifies strategic supply side interventions to support water resources across the region. Our WRMP 2019 is a low regret plan focussed on demand management, the transfer and use of existing resources and supply resilience. It will enable us to support growth, adapt to climate change, enhance the environment, and ensure a high level of supply resilience for our customers. We have limited options for new local surface and groundwater resources in many parts of our region due to the over allocation of existing resources; the only feasible supply options for 14 water resource zones (WRZs) out of 22 in deficit are transfers; and transfers are the least cost options. By deferring the development of new resources to later in the planning period, our strategy provides flexibility to support the development of winter storage reservoirs in our region. Fenland District Council is within the South Fenland WRZ, which is identified as environmentally sensitive and vulnerable to severe drought. Key strategic transfer between our Ruthamford North and Fenland WRZs - supports deficits in our South Fenland WRZ driven by sustainability reductions and drought impacts. Fenland District is now identified as the location for the Fens Reservoir and the SPA (Strategic Pipeline Alliance) crosses the district as part of the Grantham to Bexwell section.

As indicated in other areas of our submission, we consider that the Outline Water Cycle Study should be updated to take account of our draft WRMP24, which will be published for consultation in November 2022, with the final version scheduled for publication in 2023.

Anglian Water supports the coherent policy approach to address the management of water and flood risk. We suggest that the policy could be more appropriately entitled "Flood and Integrated Water Management." This should be supported by policy tests that enable a sustainable, clean, and resilient water resource achieved by:

- moving towards greater water efficiency measures - supported by community rainwater harvesting and greywater recycling,
- improving water quality - including through nature-based solutions such as wetlands and SuDS,
- ensuring better supply of water for the environment, and
- creating flood resilient communities.

This aligns with our 25-year Strategic Direction Statement and our ambitions for the future.

We welcome additional policy reference to the optional technical housing standard for improving water efficiency in areas of serious water stress. As suggested under Policy LP7 Design, we consider, to avoid repetition our suggested amendments to Part H d) should be included in this policy to replace the last sentence that states: "To minimise impact on the water environment all new dwellings should achieve the Optional Technical Housing Standard of 110 litres per day for water efficiency as described by Building Regulation G2".

LP32: Flood and Water Management

We note the policy requirement for proposals to demonstrate available water supply and adequate foul water treatment and disposal. However, as proposed under Policies LP1 and LP2, we consider a more detailed Water Cycle Study should be prepared to inform the plan rather than relying on the measures in this policy to bring forward the proposed quantum of growth. The WCS should enable a better understanding of the delivery of growth and its spatial distribution over the plan period for Fenland.

Furthermore, for some locations in Fenland, there will be areas that are served by a vacuum sewerage system. This has not been identified in the Outline Water Cycle Study and has implications for growth in certain Fenland settlements. These vacuum systems are different to conventional gravity system in that connections can only be made to an interface valve chamber, also known as a vacuum pot. These interface valve chambers have limited capacity and are only able to accommodate up to 4 properties or 0.5 litres per second. Connections are only permitted via gravity; a pumped connection is not permitted.

Due to the nature of the system, upgrades may be required to accommodate any proposed development in affected locations. If there is insufficient capacity or pressure to accommodate the new development, Anglian Water will fund the necessary improvements downstream of the connection point, which can take up to 24 months to be implemented. This will have implications for developments within several locations including: Wisbech St Mary, Gorefield, Tydd St Giles, Parsons Drove, Church End, Murrow, Guyhirn, and Christchurch. We note that the Local Plan Preferred Options identifies these settlements in the lower tier categories of Medium Villages, Small Villages A and B. Whilst most of the growth is directed to the Market Towns and Large Villages, there remains 14% of growth directed to the Medium Villages, including Wisbech St Mary and Gorefield, in addition to windfall development, where there may be delays in development coming forward owing to the nature of the vacuum sewer. For further information regarding vacuum sewers please visit our website: Vacuum Sewer (anglianwater.co.uk)

Title:		Position:	
First Name:	Susie	Organisation:	St John’s College Cambridge
Surname:	Wood		
Comment	Support		
Support for adoption of the Optional Technical Housing Standard of 110 litres per day for water efficiency as described by Building Regulation G2.			

Title:		Position:	
First Name:		Organisation:	Barratt and David Wilson Homes Cambri
Surname:			
Comment	Support		
No objection is raised to this requirement.			

LP32: Flood and Water Management

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

The policy should refer to the requirement to consider surface water flooding as part of the sequential test.

Without this addition the policy is not sound as it does not reflect national planning policy (NPPF paragraph 161).

LP32: Flood and Water Management

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

Comment Object

We welcome policy requirements to ensure availability of adequate water supply and foul water treatment to serve individual developments and however, the Plan evidence base should demonstrate availability of a sustainable water supply and foul water treatment to meet the cumulative requirements of all Plan development, in combination with pressure on water resources from adjoining districts / regionally.

The Plan evidence base should consider the strategic effects of Plan development on water quality and resources in accordance with paragraph 174 of the NPPF. It should have regard to the relevant River Basin Management Plans, available here, which identify that current levels of water abstraction are having an adverse effect on the natural environment and the actions needed to tackle them.

Current pressure on water resources across the region requires strategic alternative supply options, including the proposed Fens Reservoir, which are likely to have long timeframes for implementation. In the meantime, interim measures (alternative supply options, demand management and/or mitigation measures) are needed to ensure any further growth through Local Plans is sustainable. Pending identification and implementation of these measures, additional abstraction to meet development needs must demonstrate that it will not contribute towards further deterioration of the water environment including dependent designated sites and priority habitats. Natural England will not support development likely to have an adverse effect on the natural environment.

The requirements for development to contribute positively to the water environment and its ecology, where possible, is welcomed but needs to be more prescriptive with regard to water quality targets and BNG. As currently worded this policy requires development to deliver the bare minimum for ecology and BNG. Reference should be made to the conclusions and recommendations of the Fenland Water Cycle Study (WCS). The requirement for the implementation of SUDS should emphasise the need for multi-functional design, incorporating natural processes, that will deliver significant biodiversity, landscape, green infrastructure and amenity benefits.

Due to current water resource pressures and the drive for nature recovery, climate change mitigation and access to nature to improve health and wellbeing, we believe developers should be encouraged to contribute towards an enhanced green infrastructure network incorporating natural systems. The Fenland peat provides opportunities for implementing natural solutions that could protect and enhance the peat resource, contribute towards climate resilience and carbon capture, provide flood storage and management, ecological enhancement and accessible open space.

Natural England supports the requirement for all new dwellings to achieve the Building Regulations Optional Technical Housing Standard of 110 litres per day for water efficiency; however, due to current water resource pressures we would encourage that all new development seeks to achieve the highest water efficiency standards possible.

The policy should require relevant development to be accompanied by a detailed hydrogeological assessment.

LP32: Flood and Water Management

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

We note that there are several references to the Level 2 SFRA, as well as site specific allocations which should refer back to this document. In addition, there are a number of sites which are allocated (particularly in Wisbech which are at a greater risk of flooding). A Strategic Flood Risk Assessment should be used to inform the sustainability appraisal of the Local Plan, so that flood risk is fully taken into account when considering allocation options and in the preparation of plan policies. However, as the council is lacking a Level 2 SFRA we strongly recommend holding off on the local plan adoption until the level 2 SFRA has been adopted so that its findings can fully inform the Emerging Local Plan as it would be unsound to do so without it as it goes to the heart of these policies. We have provided additional comments on the both the SFRAs and the wider Local Plan below.

Level 1 SFRA

Section 5.3 of the Level 1 SFRA recommends that where developments cannot be located in Flood Zone 1, more detailed assessment is needed to verify the flood extent, to inform the sequential approach within the site, and to demonstrate if the Sequential Tests and Exceptions Tests are satisfied. Section 5.3 also states that the latest climate change allowances and residual risk must be considered. No evidence has been provided to demonstrate that a more detailed assessment of flood risk has been undertaken for those site allocations located partly in Flood Zones 2 and 3.

The accompanying maps include Tidal Nene Overtopping Hazard Mapping but do not include breach hazard mapping for the Ouse Washes from our Fenland Model; this mapping should also be included.

Please note that the 'Areas benefitting from defences' shown on Map K (Flood Map with sites) is different to the Areas Benefitting from Defences (ABD) dataset currently shown on our Flood Map for Planning platform. However, following a review of the ABD dataset, we have made the decision to retire this dataset and remove it from this platform in December 2022. Instead, to ensure the right decisions are made for areas at risk of flooding, a new dataset is being created to provide an indication of where the flood risk from rivers and the sea likelihood has decreased due to defences. The new dataset will be called 'Reduction in risk of flooding from rivers and sea' and will not be shown on the Flood Map for Planning portal but will be freely available to download in GIS format, along with guidance on how this dataset should be used. The Level 1 SFRA should be updated to reflect these changes. Please contact us if you need further information on these changes and how they will impact on the Local Plan.

Level 2 SFRA

There is currently no Level 2 SFRA covering relevant site allocations. A Level 2 SFRA should be used to apply the second part of the Exception Test to site allocations in Flood Zone 3 where relevant (e.g. where residential development is proposed). Without a Level 2 SFRA, the Local Plan is likely to be considered unsound as there is no evidence that the second part of the Exception Test has been passed where required (see paragraph 033 of Planning Practice Guidance (PPG) on flood risk and coastal change).

Paragraph 42 of the PPG on flood risk and coastal change states: 'Where residual risk from flood risk management infrastructure affects large areas, the SFRA will need to indicate the nature, severity and variation in risk within this area, and provide guidance for residual risk issues to be covered in site-specific flood risk assessments.'

As a large part of Fenland is reliant on flood risk management infrastructure, the Level 2 SFRA should assess the residual flood risk in more detail and should provide guidance for site-specific flood risk assessments. This guidance should be incorporated into policy LP32, as detailed below.

The Level 2 SFRA should also identify any opportunities to reduce the causes and impacts of flooding through new

LP32: Flood and Water Management

development, as detailed in paragraph 62 of the PPG on flood risk and coastal change.

22: Environment Pollution

Title:		Position:	
First Name:	Alan	Organisation:	
Surname:	Bessant		

Comment	Object
<p>2.3 Figure 1 and table 1 page 15 says that health is a strategic priority for the council. Page 17 Pollution and waste is listed as an overarching issue. Air quality is increasingly seen as a key factor in public health. LP34 (page 107 air quality) looks very light and does not appear to address this key issue in a thorough way. It should also be better linked to the health and well-being policy LP5 (page 34). There have been a number of changes in legislation since this draft plan was written, all designed to create greater emphasis on air quality - the formation of the Office for Environmental Protection for example. These changes and the potential for enhanced targets and responsibilities should be reflected in the plan. LP34 (page 106 22.9) also starts by talking about third party pollution from Europe. The fact is that in Whittlesey a number of potentially polluting industries have been allowed to set up close to the town centre and schools. Given the higher percentage of people living in our market towns this means more people have the potential to be impacted by this pollution. One of those industries is even subject to retrospective enforcement planning. The residents feel badly let down and the plan does not give enough focus on the potential impact noise and pollution is having on well-being and health. These industries have also increased the number of fully laden HGVs on the A605, increasing pollution and noise/damage to the road. This is having a significant impact on the quality of life in Whittlesey – more so as a lot of residents close to the industries are elderly and more vulnerable, as mentioned in the report. Page 106 22.10 gives the impression that there are 25 air quality monitoring sites. To date Fenland has never published measured PM10 or PM2.5 information and has never measured those in Whittlesey. I am not aware of any automated air quality measurement stations owned by the council locally. The SO2 stations are owned by Forterra and may now not be in the optimum place (based on the original Hanson Brick operation which shut years ago). LP34 does not represent the situation in Whittlesey and seems to lack ambition in terms of what is needed to monitor and manage air pollution. There has been too much reliance on modelling and third-party equipment – not real-world independent testing for the core pollutants.</p>	

LP33: Development on Land affected by Contamination

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

CommentSupport

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

LP33: Development on Land affected by Contamination

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

Comment Support

We welcome the inclusion of Policy LP33 (Development on Land Affected by Contamination) and the reference to the Environment Agency's Land contamination risk management (LCRM) guidance.

We also welcome Policy LP32 (Flood and Water Management), noting it references Cambridgeshire Flood and Water Supplementary Planning Document (2016) and that Part B states that development should not adversely affect surface and ground water quality.

With regards to the above policies, we recommend adding reference to the Groundwater protection pages on gov.uk. These are a key reference for LPAs, developers and landowners. The collection, including the Groundwater Protection Position Statements, sets out our approach to groundwater protection and management and what we want others to do. It describes the legal framework we work within and the approaches and positions we take to regulate and influence certain activities and issues, including specific activities considered to present a particularly high risk to groundwater. Groundwater Protection Position Statements G1 to G13 are of particular relevance to Policy LP32.

Environmental Setting (Groundwater Vulnerability and Sensitivity)

Much of the Fenland District Council (FDC) area lies on bedrock unproductive strata, with some secondary aquifers in the form of sand and gravel superficial deposits to the east of Chatteris and around Whittlesey and March. Secondary aquifers provide an important local groundwater resource and base flow to our surface waters. These deposits support a number of agricultural licensed abstractions, particularly around Chatteris and Whittlesey. There are no groundwater source protection zones (SPZ) within the FDC area, meaning that there are no catchments of groundwater abstractions used for licenced public water supply in the area. FDC should check their records to identify any private (non-licenced) domestic supplies in the area.

General Background

The consideration of land contamination, protection and enhancement of controlled waters via the planning regime has always been a key material consideration. However, in many instances consideration of land contamination and controlled waters at planning stage is too late. Groundwater in particular, is not a boundary issue and ensuring an area wide holistic approach when considering such a valuable resource is much more effective at strategic 'design' stage.

New activities need to be deterred in certain areas based on their intrinsic hazard to groundwater. The hazard may result from a combination of the activity type, its duration and the potential for failure of controls. Close to sensitive receptors a precautionary approach is likely to be taken even where the risk of failure is low, the consequences may be serious or irreversible. We will apply a risk-based regulation approach.

Government planning policy as set out in the National Planning Policy Framework (NPPF) states that local policies and decisions should ensure that new development is appropriate for its location, having regard to the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development (paragraph 185).

The NPPF (paragraph 183) states that decisions should ensure that the site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. The local planning authority should therefore satisfy itself that the potential for contamination and any risks arising are properly assessed and that the development incorporates any necessary remediation and subsequent management measures to deal with unacceptable risks, including those covered by Part IIA of the EPA 1990. Intending developers should be able to assure local planning authorities they have the expertise, or access to it, to make such assessments.

Permitted, licensed and historic landfills are known to be present within the FDC area. Development on top of or within 50 metres of any permitted landfill site that accepted hazardous or non-hazardous waste should be considered very carefully. Risk assessed mitigation is likely to be required within 250 metres of a gassing landfill. Local Authorities

LP33: Development on Land affected by Contamination

should also consider the risks from historic older gassing landfills without a current Environment Agency permit.

We promote the redevelopment of Brownfield sites where possible. Where development is proposed on a site which is known or has the potential to be affected by contamination, a preliminary risk assessment should be undertaken. As stated in the draft plan, preliminary assessments, and any subsequent additional information should be carried out in accordance with the Environment Agency's Land contamination risk management (LCRM) guidance.

Soakaways and other infiltration Sustainable Drainage Systems (SuDS) need to meet the criteria in our Groundwater Protection Position Statements G1 and G9 to G13. They must not be constructed in contaminated ground where they could re-mobilise any pre-existing contamination and result in pollution of groundwater. We do not consider deep infiltration systems (>2.0m below ground level) to be routinely acceptable. All infiltration SuDS require a minimum of 1.2m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. Drainage systems should be constructed in line with good practice and guidance documents, incorporating appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.

LP34: Air Quality

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

Comment Support

We welcome requirements for development to protect designated sites and wider biodiversity from air quality effects and for relevant schemes to prepare an Air Quality Assessment (AQA). A key issue for consideration are those proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic^{5*}, which feature habitats that are vulnerable to nitrogen and acid. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.

The HRA concludes that with integrated mitigation measures embedded within the Plan, including requirements for project level AQA, and predicted future reduction in emissions, there will be no adverse effect on the integrity of the Nene and Ouse Washes internationally designated sites through air quality. The assessment appears not to be evidenced through traffic modelling or predicted exceedance of the sites' critical loads and levels for Nox, NH3 and N and acid deposition. As a minimum we believe this assessment should consider the sensitivity of the sites' potentially affected habitats, indicated on APIS, to increases in these emissions and depositions.

5* The ecological effects of diffuse air pollution (2004) English Nature Research Report 580
Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency

LP34: Air Quality

Title:		Position:
First Name:	Alan	Organisation:
Surname:	Bessant	

Comment	Object
<p>2.3 Figure 1 and table 1 page 15 - says that health is a strategic priority for the council. Page 17 Pollution and waste is listed as an overarching issue. Air quality is increasingly seen as a key factor in public health. LP34 (page 107 air quality) looks very light and does not appear to address this key issue in a thorough way. It should also be better linked to the health and well-being policy LP5 (page 34). There have been a number of changes in legislation since this draft plan was written, all designed to create greater emphasis on air quality - the formation of the Office for Environmental Protection for example. These changes and the potential for enhanced targets and responsibilities should be reflected in the plan. LP34 (page 106 22.9) also starts by talking about third party pollution from Europe. The fact is that in Whittlesey a number of potentially polluting industries have been allowed to set up close to the town centre and schools. Given the higher percentage of people living in our market towns this means more people have the potential to be impacted by this pollution. One of those industries is even subject to retrospective enforcement planning. The residents feel badly let down and the plan does not give enough focus on the potential impact noise and pollution is having on well-being and health. These industries have also increased the number of fully laden HGVs on the A605, increasing pollution and noise/damage to the road. This is having a significant impact on the quality of life in Whittlesey – more so as a lot of residents close to the industries are elderly and more vulnerable, as mentioned in the report. Page 106 22.10 gives the impression that there are 25 air quality monitoring sites. To date Fenland has never published measured PM10 or PM2.5 information and has never measured those in Whittlesey. I am not aware of any automated air quality measurement stations owned by the council locally. The SO2 stations are owned by Forterra and may now not be in the optimum place (based on the original Hanson Brick operation which shut years ago). LP34 does not represent the situation in Whittlesey and seems to lack ambition in terms of what is needed to monitor and manage air pollution. There has been too much reliance on modelling and third-party equipment – not real-world independent testing for the core pollutants.</p>	