

25: Large Villages

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

Comment **Neutral**

The large villages identified in the Local Plan (Doddington, Wimblington and Manea) are located close to the proposed Fens Reservoir. Whilst residents may have concerns about the project and are encouraged to respond to our consultation, we also recognise that the reservoir can also provide opportunities for these settlements in terms of enhancing economic and social prosperity.

LP48: Residential site allocations in Doddington

Title:	Mr	Position:	
First Name:	John	Organisation:	Maxey Grounds
Surname:	Maxey		
Comment	Object		
Site ref 40142			

We act for the owners of this site and on their behalf object to rejection of the proposal to allocate this site south of Benwick Road Doddington.

Looking at the evidence report, we can not reconcile the comments regarding this site compared to the adjoining land to the east which is allocated as LP48.02. Reading the conclusion one would assume that the sites are miles from each other rather than adjoining.

The site represents an area of land which would be the only frontage undeveloped or unallocated on this section of Benwick Road other than the graveyard and playing fields, which it sits between. It is closer to the village facilities than other recent development further west on Benwick Road, and all village facilities and public transport is within walking distance. As such we refute the suggestion that it has a poor relationship to the built form of the village or would have significant adverse visual impacts.

Frontage development would be very much in character with the built form in this area, and we also believe that, either in conjunction with or alongside the development of LP48.02 adjoining, it is suitable for development in depth, reinforcing the central built form of the village.

Title:	Mr	Position:	
First Name:	Colum	Organisation:	Cambridgeshire County Council
Surname:	Fitzsimons		
Comment	Neutral		
Both local primary schools at Doddington and Wimblington are on restricted sites and have no scope for expansion. There is currently limited space capacity at Thomas Eaton Primary School (Wimblington), however this is not sufficient to accommodate all the pupils expected to be generated from the proposed housing allocations in both villages. The Council has been negotiating additional land to expand Lionel Walden CE Primary School as part of a planning obligation associated with a proposed development at land east of Bevills Close Doddington (F/YR21/1072/FDL). If this is successful, then there would be some scope to expand the school.			
Since the Council’s response was submitted, the planning application referred to above has been refused by the Fenland District Council Planning Committee. This has removed the opportunity for the County Council to secure the land necessary to expand the Lionel Walden Primary School. Without the ability to expand school places in either village it will not be possible to mitigate the scale of growth proposed in the Local Plan.			
The Plan should demonstrate how this necessary infrastructure will be delivered.			

LP48: Residential site allocations in Doddington

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

There is the potential for sand and gravel to be located under site allocations LP48.02,04,06,08,09,07 and 03. Development should make best use of any material incidentally extracted.

Title:		Position:	
First Name:	Annabel	Organisation:	
Surname:	Farlow		
Comment	Object		

Doddington is a small village - it does not have the infrastructure to support over 300 new houses over the next 10 years.

Who has come up with this ludicrous number? The school is full, the Doctors has no capacity to take on more patients, there are no local dentists accepting NHS patients, the water system can't cope now and Anglian Water have no plans to fix it.

Title:	Mr	Position:	
First Name:	Peter	Organisation:	Peter Humphrey Associates Ltd
Surname:	Humphrey		
Comment	Object		

There should be more allocations close to Manea train station (north).

LP48: Residential site allocations in Doddington

Title:	Mr	Position:	
First Name:	Tim	Organisation:	3D Planning Limited
Surname:	Slater		

Comment Object

the allocations made under LP48 -omit perhaps the best and most deliverable sites within the village that will deliver both, much needed affordable housing and provide the only opportunity for an extension to the infant school playing fields.

Supporting statement of case in relation to Ashley Kings (Ashwood Home's) objection to LP48.

It is considered that the council's analysis and assessment of the site within the local plan is unsound- based on a number of incorrect assumptions, which as a consequence has led to the site being discounted and not allocated in the emerging local plan.

Background;

It is accepted that Doddington is appropriately identified in adopted and emerging local plans settlement hierarchy as a larger village.

It has a range of rural services and facilities (some shared with neighbouring Wimblington) such that it functions as a large rural village.

The transport links between the neighbouring towns of Chatteris to the south and March to the north are such that residents have good (for a rural area) access to higher order services and facilities in both neighbouring towns.

The site is not included as an allocation in the emerging local plan- the reasons for this omission do not tally with the consultation responses and facts of the case in relation to the current planning application on site (FDC ref; F/YR21/1072/FDC)- which shows that both access and heritage matters do not form a constraint to development.

The errors in assessing the site are such that the LPA assessment process in respect to this site is considered to be unsound as it has misdirected itself in several matters of fact- leading to conclusions that are at odds with (and as a consequence not sound based on) the consideration of the current planning application. FDC ref; F/YR21/1072/FDC. The initial representation to the call for sites in relation to Ashwood home's site is set below.

The site number for the council's assessment is 40144 (page 174-177 of the Councils' Sustainability Appraisal Annex C and SHELAA Stage 2 Main Report (August 2022) and all sites by settlement.

Doddington

My client agrees with the council's identification of Doddington to accommodate significant new housing growth over the coming plan period, recognising that the village is a sustainable and accessible larger village- and in the Fenland context it is unusual as it is largely in flood zone 1- area of lowest risk and as such sequentially preferable in terms of housing allocation and delivery.

Within the detailed site assessment of the site, it is identified as being potentially unsuitable. The assessment of the major criteria are all positive criteria – points 1- 7(ii)- however it is noted that at 7(ii) in the assessment (planning history)- no reference is made to the current planning application on the site ref. F/YR21/1072/FDC - this application has been live since September 2021 and throughout this period has been progressing towards a positive recommendation.

Description of development

Erect 47 x dwellings (2 x single-storey 2-bed, 11 x 2-storey 2-bed, 19 x 2-storey 3-bed, and 15 x 2-storey 4-bed), with

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associated garages, parking and landscaping, involving the demolition of existing agricultural building and garage to 44 Bevills Close.

NB that the site area has changed slightly from the 'call for sites' submission, and the application site indicates that vehicular access is to be taken exclusively from Bevills Close- with a pedestrian access to the north- again joining to Bevills Close- see current layout plan below- this arrangement has been subject to correspondence with Cambridgeshire County Highways Development management and the latest version of the plan is believed to incorporate all of the county's requirements and is addressed in the officers comments dated 24/8/2022.

At the time of writing this submission (Sept 2022) it is understood that the application will be presented to Fenland District Council planning committee at its October meeting (just after the closing date for LP reps)- and it is understood that a positive recommendation will be made.

In respect to the assessment in the local plan SHELAA Stage 2 Main Report (August 2022) and all sites by settlement, it appears that in assessing the site for inclusion in the emerging local plan, no reference was made to the current planning application on the site- which as part of its consideration has addressed all of the concerns set out in the site assessment.

In respect to access-the local plan assessment assumes access from Eastmoor Lane- which is not the case- vehicular access is made from Bevills Close- as shown on the current layout plan 53- SL-01 rev I. (Above). See annex 1 for the county councils' latest consultation comments in relation to the highways and transportation impact of the application.

Lack of connections to PROW- this is addressed in the planning application submission; the current layout shows pedestrian connection to Bevills Close at 2 points and to Eastmoor Lane to the south.

Heritage; the local plan assessment; suggests that the allocation of the site could have adverse impacts on heritage assets- However...

The site is not within a conservation area (the undeveloped northern boundary abuts it)- nor is it within or close to any listed buildings.

Within the current planning application (which has been live for over a year) there is no objection /comment from the council's building conservation officer- in addition, it is noted that a formal pre application consultation was carried out with the Council in advance of submitting the application; and at no time was impact on heritage noted as a concern or issue to the council in respect to the development of this site.

The LP assessment simply lists a number of heritage assets within 500m of the site – which is correct as a matter of fact- however it is eminently clear that the proposal is separate from and has no material impact on any listed building- such that the designation of a 'D' in the LP assessments is unsound and misleading.

The planning assessment at 19c suggests that the primary school is a 'non-designated heritage asset'- there is no mention of this within any of the planning history pursuant to the school site (on the FDC website) or in any local plan proposal document.

Cambridgeshire's Local Heritage list Website (at 12 Sept 2022) shows no non designated heritage assets listed within in Fenland.

We have emailed FDC conservation seeking clarification as to the status of the school site in heritage terms- however given the appearance of the school site and the extent of extensions (front and back) to it is suggested that the school is not of material heritage importance. An email from the Head of Development Management on the 12 September;

It is therefore concluded that heritage impact is not a material consideration / constraint in respect to the site's potential for development.

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The County Council archaeology officer has commented on the application 3 times and refers back to previous application on site; the county archaeologist recommends a standard Grampian archaeology condition for the site. It is understood that the written scheme of investigation is about to be agreed- such that archaeology does not provide a constraint to development.

Relationship to school- the site is adjacent to the school and a new footpath link is proposed to enable direct access for the school from the south giving the site by far the best access to the school of any allocations in the emerging local plan- the local plan assessment does not appear to have given weight to the material considerations in the current planning application- which specifically address planning concerns raised by the council and LPA.

In addition, the planning application proposal incorporates an area of land to be transferred to the school for additional playing fields; the discussion in relation to this is very advanced with the county council as education authority and the school itself- both parties are keen to secure this land to provide additional playing fields and recognise that it is the only opportunity to gain additional land for the school.

It is noted that the Parish Council is supportive of the use of part of the site for a school expansion. The position of pond on site is noted for biodiversity interest and the current planning application addresses this within its ecological assessment and BNG assessment- there are no outstanding objections in relation to ecology pertaining to the current application. Noted agricultural land quality- however the vast majority of the land in and around this part of Fenland is BMV land- and this is an issue for all of the allocations in Doddington and Wimblington.

The final assessment in the local plan- focusses on what is described as a 'constrained access' as the primary reason for rejection and the assessment persists in assuming the access would be from Eastmoor Lane.

It is noted from the above that the parish council supports the principle of development on the site, but at 20 units the proposal would not make best use of the land as required by the NPPF.

As set out above (and detailed in the site layout on page 3) there is no vehicular access onto Eastmoor Lane proposed as part of the scheme- the vehicular access is to Bevills Close, with additional pedestrian access to Bevills Close, the school and pedestrian access to Eastmoor Lane- cycle access is available to Bevills Close.

It is currently anticipated that the current planning will be presented to FDC planning committee at the October meeting- I attach the officer report recommending approval (and addresses all of the issues highlighted in this report) and will notify the local plan inspector of the decision of the planning committee- as this is clearly a material consideration in relation to this site.

Clearly the relationship of the site allocation to the current planning application is material; I can send the inspector a duplication of the application file key documents- however in the interests of expedience it is suggested and requested that the inspector refers to the councils' public access website.

Deliverability

The site is under option to Ashley King of Ashwood Homes – which is a prolific local developer within South Lincolnshire and North Cambridgeshire- subject to the grant of planning permission it is intended to commence development at the earliest opportunity.

Conclusion

- The site is subject to a full planning application for the erection of 47 Homes- which is likely to be determined by FDC planning Committee in Autumn this year.

The site assessment carried out in respect to the site appears to have had no reference to this application and has misdirected itself in terms of matters of fact relating to potential site constraints, development opportunities and the allocation and development of the site.

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This level of misunderstanding of the site and misdirection in terms of constraints is clearly unsound in that significant weighting in the council's analysis was based on incorrect assumptions about the site, its development and its surroundings. It is clear from the current planning application that there are no technical or environmental constraints to the development of the site for 47 homes; the access is considered appropriate by Cambridgeshire County Council Highways

- There are no heritage objections in terms of conservation area / listed buildings
- Archaeology is addressed through WSI.
- Council officers are satisfied with the development design and sustainability grounds.
- The development provides significant public benefits in terms of provision of land for the expansion of the school site; clearly this is the only site opportunity to achieve this benefit.
- The site also enables a new access to the school from the south to improve accessibility.

It is therefore requested that the local plan allocations for Doddington be revisited, and the Bevills Close site included as an allocation to reflect the planning status of the site.

LP48.01

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

Comment Object

The Doddington Neighbourhood Plan Group feels that the proposed allocation of 145 dwellings is not appropriate as the site is not suitable for this scale of development owing to the highway constraints in relation to access to the site from within the village together with the scale of the new housing proposed relative to the existing village.

The proposed 145 dwellings represent around a 14% increase to the amount of existing housing within the village. The development would therefore be out-of-scale with the village and would also adversely impact the core shape and character of it.

The Group feels that the site may, subject to highway and access constraints being demonstrated to be resolved (or resolvable), potentially be suitable for around 72 dwellings with the remainder of the land being made available for community use (potentially to allow the relocation of the existing scouts building within the village).

This allocation may also need to facilitate access towards the Fens Reservoir project which is proposed to the east of the A141.

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

Comment Object

Whilst there are no designated heritage assets within the site boundary, there are two grade II listed cottages on Newgate Street and the Doddington Conservation Area is nearby.

Any development of the site has the potential to impact these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.

Suggested Change - Prepare an HIA and use findings to inform policy wording.

LP48.01

Title:

Position:

First Name: Will

Organisation:

Surname: Mason

Comment

Support

These representations are submitted by Mr A Mason and Mr R Mason who are the owners of the land west of Turf Fen Lane and south of Newgate Street (Site Allocation LP48.01) as detailed in Policy LP48: Residential site allocations in Doddington of the Fenland Draft Local Plan 2021-2040: Draft Local Plan Consultation (Regulation 18). Please see Appendix 1 below which illustrates the allocation LP48.01.

We fully support the aforementioned proposed allocation as set out in policy LP48. It is our view that when the allocation of this site is assessed against the four tests of soundness set out within the NPPF, these being positively prepared, justified, effective and consistent with national policy, the site is found to be sound in planning terms.

Site Description

The site lies to the south of Doddington, bordered by existing built form to the north, east and west with open views to the south and extends to approximately 16.4 acres under one ownership. To the east of the site is Turf Fen Lane and Newgate Street runs to the north.

Planning Policy

According to paragraph 68 of the NPPF, strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a 'strategic housing land availability assessment' (SHLAA). Planning policies should identify a supply of specific, deliverable sites for years 1-5 of the plan period and specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15 of the plan.

The inclusion of Site Allocation LP48.01 land west of Turf Fen Lane and south of Newgate Street will assist the Local Planning Authority in demonstrating a key deliverable site in what is defined as a Large Village in the Emerging Plan, with a good range of local services and facilities, including a primary school, shop, post office and doctor's surgery.

Policy LP48 (Site Allocation LP48.01)

Land west of Turf Fen Lane and south of Newgate Street is a draft allocation for a residential development of 145 dwellings with associated landscaping and infrastructure. The development of the site will create a natural extension/infill to the existing village of Doddington. The development of the site will provide much needed market and affordable homes as well as a provision for high quality public open space, tree planting and biodiversity enhancements.

Please find below a response to each of the policy requirements set out in Policy LP48 of the Fenland Draft Local Plan:

- Significant highway improvements at Turf Fen Lane, including widening and enhancement of footway – No objection to this policy and we would work with the local highway authority to agree appropriate access solutions for all modes of transport
- Pedestrian and cycle links through to Cooks Green and Turf Fen Lane, including to Doddington Public Footpath No. 19 – No objection is raised in relation to this policy criteria
- Safeguarding of the setting and character of the nearby Doddington Conservation Area, listed buildings and non-designated heritage assets in the vicinity including the retention of key views following detailed assessment – No objection is raised in relation to this policy criteria. The development will be designed in a sympathetic manner taking into account the local heritage and character. We will work with technical partners and advisors and take on board their heritage advice
- Archaeological investigation to determine the need for archaeological mitigation works – No objection is raised in relation to this policy criteria. Archaeological evaluation will take place on the site. Supporting technical information will be submitted to support the future planning application

- Retention of potential valuable grassland habitat at eastern section of site and provision of mitigation and compensatory habitats to achieve biodiversity net gain – No objection raised in relation to this policy criteria, where appropriate valuable grassland habitat will be retained as open space and whilst the development will seek to retain as much of the existing biodiversity as possible, where necessary, mitigation and compensatory habitats will be provided to enhance biodiversity on the site. In addition to this, we own land immediately adjacent the allocated site, allowing us to implement biodiversity enhancement there if necessary
- Appropriate assessment and mitigation of potential land contamination – No objection is raised in relation to this policy criteria. Contaminated land investigations will take place on site and supporting technical information will be submitted to support the future planning application
- An assessment of Flood Risk, which reflects the recommendations of the SFRA level 2 assessment – No objection is raised in relation to this policy criteria. The site boundary of the land allocated is situated to the north of the SFRA level 2 assessment and within flood zone 1
- Landscaping and screen planting along southern site boundary to mitigate visual impacts – No objection to this policy. We propose a high quality landscaped scheme to be developed to ensure adequate screening along the northern and eastern boundaries. Landscaping and tree planting along this boundary will help to create a visually well contained development and minimise the visual impact of the scheme

Conclusion

Doddington is identified as a Large Village and the land west of Turf Fen Lane and south of Newgate Street will create a natural extension to the existing settlement.

The allocation of the site under policy LP48 is fully supported by us. The site is fully deliverable in planning terms and offers an appropriate location for strategic growth, furthermore we are consulting with large Plc house builders with a good track record of delivering sites both locally and nationally, after they approached us showing interest in the site. The site is considered to be sound from a planning perspective therefore inclusion of the allocation is important to ensure that the Local Plan is positively prepared, justified, effective and in accordance with national policy.

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

Comment Neutral

This is a good site for a large development, within the village footprint, but I would dispute the number of houses being put forward. It is great that Turf Fen Lane will be improved, but fail to see how the remaining access to the centre of the village through Church Lane and Eastmoor Lane could possibly be improved. These roads are totally unsuitable for any increase in traffic. Suggest an alternative access to the proposed site, or a severe reduction in the number of houses being proposed

LP48.02

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

Comment Object

The Doddington Neighbourhood Plan Group considers that the proposed allocation of 55 dwellings is not appropriate as the site is not suitable to accommodate any new housing development given the surface water constraints and the heritage value of the site.

The Group also considers that Benwick Road, which already has a: Village Hall, Scout Hall, GP surgery, Minor injuries clinic and Hospital clinics, a children's nursery, two garden centres, care home, Doddington court, motor cross, sports field and campsite/fishing lakes, along it which causes concerns in respect of additional vehicular flows.

There is also limited visibility on the bend in the road to the east (opposite Stone Cottage) and seeing oncoming vehicles coming in to the village centre.

The neighbouring properties are already suffering from horrific sewage smells entering their homes.

This site is also understood to be a habitat for Grass Snakes.

The Council's own Conservation Area Character Appraisal makes special mention of the site in relation to retaining the views to the church from Benwick Road. These would be lost.

Both neighbouring pieces of land were rejected. Site ID: 40139, due to the importance of the conservation area, impact on its setting and the green setting, loss of key views to the church and harm to open countryside; and Site ID: 40142, which is right next to the proposed site was rejected due to its poor relationship to the built form, impact on the character and form of the village, extending considerably into open countryside and adverse visual impact.

The policy is therefore not sound as it is not justified nor does it reflect national planning policy in relation to flood risk, heritage and ecological impacts.

Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment	Neutral		
No comments			

Title:		Position:	
First Name:	Martyn	Organisation:	
Surname:	Lancaster		

Comment Object

A housing mix which takes account of the proximity of Doddington Hospital and the opportunity to provide accommodation for key workers; I assume you plan to build on the hospital site ? instead of building a new Hospital?

Title:		Position:	
First Name:	Hilton	Organisation:	
Surname:	Fisher		
Comment	Object		
<p>Benwick road already has a village hall, scout hut, GP surgery, minor injuries unit, hospital clinics, child nursery, two garden centres, care home, Doddington Court, motor cross, campsite and fishing lakes and recreation field. There is limited vision due to the bend in the road opposite stone cottage and seeing oncoming vehicles coming into the village centre. Neighbouring properties already suffer from horrific sewage smells coming into their homes thru the drains. The grass field is a habitat for grass snakes. FDC'S own conservation report makes special mention of retaining the views towards the church from Benwick road. These would be lost. Both neighbouring pieces of land put forward were both rejected, 40139, due to the important of the conservation area, impact on its setting and the green setting, loss of key views to the church and harm to open countryside. 40142, which is adjacent to the proposed site was rejected due to its poor relationship to the built form, impact on the character and form of the village, extending considerably into open countryside and adverse visual impact. For these reasons I believe this proposed site should be taken out of the new local plan.</p>			

Title:	Ms	Position:	Chair
First Name:	Ruth	Organisation:	Doddington Parish Council
Surname:	Huften		
Comment	Object		
<p>This is Diocesan land, and abuts the current development on one side of Benwick Road. Unsuitable for development because of the traffic problems already prevalent on that road. Development on the adjoining field has been refused. There are many employment and recreational sites that empty onto Benwick Road, including Delfland Nurseries, The Recreation Pavillion, Doddington MIU, Doddington Surgery, Askham Village Settlement, Polly Pippins Nursery, The Village Hall, The Scout Hut etc. All of these sites have to use Benwick Road to get into the village to catch public transport, or to get to homes outside the village. There are already problems with sewerage on the road, with unpleasant smells a regular occurrence. Any development here would seriously affect the important view of St. Mary's Parish Church.</p>			

Title:		Position:	
First Name:		Organisation:	Ely Diocesan Board of Finance
Surname:	Ely Diocesan Board of Finance		
Comment	Support		
<p>The Diocese of Ely support this site allocation for 55 homes. The site is deliverable and available immediately.</p> <p>Technical studies including ecology and design work have already been undertaken and the policy with its criteria is achievable on this site.</p>			

LP48.03

Title: Councillor **Position:**

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

Surname: Hopkins

Comment **Object**

The Doddington Neighbourhood Plan Group considers that this site is not suitable for the erection of 40 dwellings.

The site is considered to capable of potentially being a Local Green Space or identified as an important landscape feature to the village given the manner in which it brings the countryside in to the village. This is one of the few remaining locations where the countryside feels close to the village centre and the character of the land therefore contributes significantly to the rural nature of the village.

The Group feels that the site may be capable of potentially being used for allotments for local residents. The Group is also aware that the site is currently used for informal recreation by villagers.

The Group considers that the site should not be allocated for any development.

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

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

Surname: Mack

Comment **Object**

Whilst there are no designated heritage assets within the site boundary, the scheduled monument – the Moated bishops palace at Manor Farm – lies to the south of the site. The grade II listed Round House lies to the south west of the site.

Any development of the site has the potential to impact these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.

Suggested Change - Prepare an HIA and use findings to inform policy wording.

Title: Ms **Position:** Chair

First Name: Ruth **Organisation:** Doddington Parish Council

Surname: Hufton

Comment **Neutral**

A good site for develoment. Again Diocesan land, formerly used for allotments. Would make an excellent sire for affordable houses and would contain enough area for green space to be allocated as part of any development. Good access onto suitable road system. Archeological conditions would have to be looked into given possible site of the medieval Bishops Palace in this area.

Title:		Position:	
First Name:		Organisation: Ely Diocesan Board of Finance	
Surname: Ely Diocesan Board of Finance			
Comment	Support		
The Diocese of Ely support this site allocation for 40 homes. The site is deliverable and available immediately.			
Technical studies including ecology and design work have already been undertaken and the policy with its criteria is achievable on this site. Access is available from Wimblington Road and the existing orchard would be retained as part of the development masterplan.			
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Title:	Councillor	Position:	
First Name:	Ruth	Organisation:	Doddington Neighbourhood Plan Group
Surname:	Hopkins		

Comment Object

The Doddington Neighbourhood Plan Group considers that this site is not suitable for the erection of 31 dwellings.

The site is fully within the Doddington Conservation Area and the site plays an important role in understanding the relationship of the historic core of the village with the open countryside beyond. The Group considers that new development at the site would be unable to preserve or enhance the character and appearance of the Doddington Conservation Area.

Development at the site would also adversely impact the setting of Listed Buildings including the Windmill and Clock Tower which are both prominent features of the village.

Where such development affects certain designated heritage assets (such as the proposed site, the Doddington Conservation Area and nearby Listed Buildings), there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on designated heritage assets. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.

The relevant legislation in this case extends from section 66 of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving or enhancing listed buildings and their setting. The meaning and effect of these duties have been considered by the courts, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.

The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

Section 69(1) of the Act requires LPAs to 'determine areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and to designate them as conservation areas.

For development within a conservation area section 72 of the Act requires the decision maker to pay 'special attention [...] to the desirability of preserving or enhancing the character or appearance of that area'. The duty to give special attention is considered commensurate with that under section 66(1) to give special regard, meaning that the decision maker must give considerable importance and weight to any such harm in the planning balance.

There is no evidence that the proposed allocation would be able to satisfy either legal test.

The Council's Conservation Area Appraisal also identifies buildings of local interest close to the site.

There are also concerns regarding highway safety given the potential location of the vehicular access and the proximity of nearby community uses. The Group is aware that parking along Benwick Road in the vicinity of the site is constrained.

The Group do not consider the site is suitable for any housing allocation.

The policy is therefore not sound as it is not justified nor does it reflect national planning policy in relation to highway and heritage impacts.

LP48.04

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

Comment Object

Whilst there are no designated heritage assets within the site boundary, the grade II listed Doddington windmill lies to the east of the site. The Doddington Conservation Area lies adjacent to the site.

Any development of the site has the potential to impact these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.

Suggested Change - Prepare an HIA and use findings to inform policy wording.

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

Comment Object

Access to this site is from Benwick Road, already overcrowded with traffic (see comments on LP48.02). The site would empty onto the top of Benwick road, near to a very busy junction onto High Street & New Street, where there is a bus stop, and the scout hut, and would go through the very busy footway which is used by wheelchair users from Askham Village. All of these areas pose a danger to motorists, cyclists and pedestrians. The proposed number of houses (31) would mean a further 60 plus cars using this already congested roadway, where there are also an estimated 70 plus daily HGV journeys taking produce to the Greenvale Factory at Floods Ferry. The site is a lovely green space, with a large number of trees, would make a really useful site for allotments or a designated green space and would help to mitigate any disruption to wildlife caused by other development in the village.

LP48.04

Title:	Mr	Position:	
First Name:	Tim	Organisation:	3D Planning Limited
Surname:	Slater		

Comment **Support**

Available and deliverable

Clifton Homes is working with the landowner to promote the site and to seek planning permission on it for residential development.

I am able to confirm that the site is still available and deliverable as a housing scheme within the early part of the new local plan timeframe.

Developer

Clifton Homes is a small-scale developer working predominantly in southern England and would look to deliver the allocated housing as envisaged in LP48.04.

Clifton Homes and the landowner are supportive of the site a draft allocation in the emerging plan and are committed to bringing this forward.

Clifton Homes - support

- The identification of Doddington as a large village under LP1 recognising the significant range of services and facilities in the village and neighbouring Wimblington.
- The including of the site within the new development boundary for Doddington- recognising the spatial relationship of the site to the built form of the village rather than to the rural / agricultural characteristics of the open countryside to the north.
- The wording of the policy and explanatory text relation to Doddington and in particular the wording of LP48.04.

Community benefits

The landowner grew up at the property and is concerned at affordability in the village and the lack of new affordable homes coming forward from the new developments. He is keen, in conjunction with a Housing Association, to enable his land to deliver as much affordable housing as is commercially viable (but at least policy compliant affordable housing) and has a realistic view of the land value necessary to achieve this.

Being adjacent to the village hall, development on this land could deliver disabled parking and possibly a drop off lay by near to the main entrance.

Heritage assets

We noted in previous representations a number of inaccuracies within the village conservation area appraisal that covers this site; we will work with the council's conservation team to address and accommodate heritage impacts within the scheme.

The illustrative layout submitted with the initial call for sites submission shows one way in which the site could be developed to deliver the dwellings anticipated.

Summary

- The site is still available and deliverable with a willing landowner and developer working in conjunction with a Housing Association to bring this forward.
- We are supportive of the draft allocation under LP48.04 and will work with the local community and Fenland planning officer to bring this forward in a timely manner.

LP48.04

- The landowner is keen to achieve as much affordable housing as possible on this site to meet local needs.
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LP48.05

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

Comment **Neutral**

This site is already allocated - so I have no comments

LP48.06

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

Comment	Object
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The Group does not consider that this site is suitable for housing development.

The site (when combined with draft allocation LP48.08) is currently the subject of an application for 16 dwellings (Council ref: F/YR21/1386/F) and so identifying the site for 17 dwellings (together with 10 dwellings on allocation LP48.08) suggests that the site appraisal is flawed.

In any event the proposed allocation would have an unacceptable impact upon the setting of nearby Listed Buildings (including the Listed Windmill) and would severely harm the character and appearance of the Doddington Conservation Area.

The Group considers that any housing proposal on the site would be unable to satisfy the relevant legal and planning policy tests in relation to heritage impacts.

The Group supports the opposition of the current planning application F/YR21/1386/F by the Council's Conservation Officer. Those comments are attached.

The Group is aware of damage which has been caused to the Listed Windmill by virtue of construction impacts from the initial housing development.

The site is also constrained by surface water flooding and no sequential test appears to have been undertaken in that regard.

The site is also not sustainable in terms of access/transportation. The closest part of the land to local services (i.e. the village Post Office) is 1,180m walk/cycling away, but in physical distance its 60m away, with no direct pedestrian route, increasing congestion.

The Group is also aware that in approving the planning application (F/YR17/0406/F (Juniper Close)) to the north of the allocations at Policy 48.06 and 48.08 the Council's Conservation Officer at the time stated:

"The open undeveloped space between the rear of the High Street and the site in question currently comprises of cut grass meadow and will remain as a buffer between the proposed development and Conservation area".

"It is, however, felt that the cut grass meadow buffer which will exist between the windmill and the proposed development is important to the setting of the windmill and the sense that it sits on the edge of the settlement as it was intended to when built".

In respect of biodiversity matters the current application (F/YR21/1386/F) includes a biodiversity net gain assessment which concludes that the proposed development will result in an 87.89% loss in habitat units (a loss of 5.39 units). Set against a policy requirement of a minimum 10% net gain requirement such an impact is clearly contrary to national planning policy (NPPF paragraph 174) and the Environment Act requirements. Again the Group notes that a 87.89% loss in habitats relates to a scheme of 16 dwellings whereas Policies 48.06 and 48.08 cumulatively propose 27 dwellings. It is reasonable to conclude that the addition of 11 extra dwellings (which would be required to fulfill the draft allocation) would create even larger net gain losses.

The Group considers that the site should not be allocated for any development.

LP48.06

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

Comment **Object**

Whilst there are no designated heritage assets within the site boundary, the grade II listed Doddington windmill lies to the west of the site. The Doddington Conservation Area lies adjacent to the site.

Any development of the site has the potential to impact these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.

Suggested Change - Prepare an HIA and use findings to inform policy wording.

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

Comment **Support**

These sites have no major constraints, and as the Evidence document records is a sensible progression of phase 1 enabling pedestrian linkage of the existing development to the village entirely within Flood Zone 1 and within close proximity to all village facilities

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

Comment **Object**

This is Phase 3 of the development at Juniper Close. With the 28 bungalows already built as phase one of this development, together with the 10 being proposed as phase 2 and the 17 as phase three, this will mean that a total of 55 houses will be built on a most unsuitable wet site, prone to flooding, a wildlife haven where both roe and muntjack deer are seen, together with tawny and barn owls, red kite, green woodpeckers and a plethora of smaller birds, together with butterflies, dragon flies and many other insects. The site is also within a very short distance of a grade 2 listed windmill tower, which has already suffered damage from the first phase of this development. A total of circa 120 additional cars from this proposed site will have to exit from the tight exit at the top of Wood Street, onto an already overcrowded High Street, only 100 yards from the local village primary school. As there is no exit onto the High Street at the southern end of the development, residents would have to walk some 1.2 miles through phase 3, phase 2, phase 1 (Juniper Close) and onto Wood street to access the school and shops. Totally unacceptable for mothers with small children, prams and buggies and the elderly, and will, of course mean that cars are used.

LP48.07

Title: Councillor

Position:

First Name: Ruth

Organisation: Doddington Neighbourhood Plan Group

Surname: Hopkins

Comment **Neutral**

The Group feels that this may be an appropriate site for development but that it should not be linked to site LP48.03 as that site is not suitable for housing development.

Title: Ms

Position: Historic Environment Planning Adviser

First Name: Debbie

Organisation: Historic England

Surname: Mack

Comment **Object**

Whilst there are no designated heritage assets within the site boundary, the scheduled monument – the Moated bishops palace at Manor Farm – lies to the south of the site.

Any development of the site has the potential to impact the scheduled monument and its setting. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.

Suggested Change - Prepare an HIA and use findings to inform policy wording.

Title: Ms

Position: Chair

First Name: Ruth

Organisation: Doddington Parish Council

Surname: Hufton

Comment **Object**

Additional access onto Wimblington road would be needed for this back land development on a very wet site, prone to flooding. It would totally alter the street scene on this part of Wimblington Road and would open the floodgates for further back land development along this part of Wimblington Road up to Brickmakers Arms Lane. This road is currently designated as a 40 mph road.

LP48.08

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

Comment	Object
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The Group does not consider that this site is suitable for housing development.

The site (when combined with draft allocation LP48.08) is currently the subject of an application for 16 dwellings (Council ref: F/YR21/1386/F) and so identifying the site for 17 dwellings (together with 10 dwellings on allocation LP48.08) suggests that the site appraisal is flawed.

In any event the proposed allocation would have an unacceptable impact upon the setting of nearby Listed Buildings (including the Listed Windmill) and would severely harm the character and appearance of the Doddington Conservation Area.

The Group considers that any housing proposal on the site would be unable to satisfy the relevant legal and planning policy tests in relation to heritage impacts.

The Group supports the opposition of the current planning application F/YR21/1386/F by the Council's Conservation Officer. Those comments are attached.

The Group is aware of damage which has been caused to the Listed Windmill by virtue of construction impacts from the initial housing development.

The site is also constrained by surface water flooding and no sequential test appears to have been undertaken in that regard.

The site is also not sustainable in terms of access/transportation. The closest part of the land to local services (i.e. the village Post Office) is 1,180m walk/cycling away, but in physical distance its 60m away, with no direct pedestrian route, increasing congestion.

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

Comment	Object
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Whilst there are no designated heritage assets within the site boundary, the grade II listed Doddington windmill lies to the south west of the site. The Doddington Conservation Area lies to the south of the site.

Any development of the site has the potential to impact these heritage assets and their settings. Therefore, we recommend you prepare an HIA. The recommendations of the HIA should then be used to inform the policy wording.

Suggested Change - Prepare an HIA and use findings to inform policy wording.

LP48.08

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

CommentSupport

These sites have no major constraints, and as the Evidence document records is a sensible progression of phase 1 enabling pedestrian linkage of the existing development to the village entirely within Flood Zone 1 and within close proximity to all village facilities

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

CommentObject

Please see comments for LP48.06

LP49.01

Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment	Neutral		
No comments			

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

Comment **Support**

We act for the owners of this site at Westfield Road Manea. They support the proposed allocation of a site part of which previously had frontage consent about 12 years ago.

The site is surrounded by development or land with consent on 3 sides which is a constraint to modern farming. Land quality is Grade III, the lower end within Fenland District. The site is predominantly in Flood Zone 1. The site relates well to the built environment of the village with little in the way of constraint.

The land is available and our clients are actively working with a developer to deliver the allocation in the early part of the plan period.

For the reasons stated within the evidence report we agree that this site should be allocated and support the policy.

LP49.01

Title:		Position:	Graduate Planner
First Name:	George	Organisation:	Allison Homes Limited
Surname:	Wilkinson		

Comment **Support**

Manea Site Representation- Policy LP49.01

Allison Homes fully supports this site as a residential allocation in the large village of Manea. This allocation will help meet the Fenland District Councils Local Plan growth strategy set out in LP2, where large villages account for at least 8% of new development in Fenland. The site is also located in the settlement boundary of Manea, and as such, development should be supported in principle according to LP1.

The sustainable village of Manea offers excellent public transport links, and the site will be well connected to local services and education through footway/cycleway connections along West Field Road, as mentioned in policy LP49.01. The site itself has few constraints and good access, and the planning application will be submitted with a non-breeding bird survey to ensure the development has no adverse impacts on the Ouse Washes SPA and Ramsar.

Allison Homes, along with the landowner, is fully committed to bringing this site forward for at least the number of homes identified in the draft allocation. We acknowledge the objectives of draft Policy LP49.01 into the design of the development, focusing on the connectivity with Manea and public footpaths, as well as landscaping and planting on south-eastern boundary of the site to reduce the impact on the landscape. We consider that in the context of the Draft Local Plan policies the site is deliverable and we would anticipate being able to bring it forward either in the short or medium term.

Title:	Mr	Position:	
First Name:	Peter	Organisation:	Peter Humphrey Associates Ltd
Surname:	Humphrey		

Comment **Object**

Too large allocation at Wisbech end of village.

Allocation on goose and swan functional land.

Allocation should be for frontage development only.

LP49.02

Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment	Neutral		
No comments			

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

Allocation LP49.02, p.144

This allocation wording correctly says ‘proposals will be required to mitigate any evidenced recreational impacts on the Ouse Washes SPA’. However, for this to occur, a project level HRA needs to be undertaken – this needs to be included in the policy wording. Under case law, mitigation cannot be taken into consideration before the likely significant effect test has been applied (in effect HRA screening).

In addition there doesn’t seem to be documentation outlining the habitats present on the site, and so its unclear where the policy wording for the need for significant mitigation and compensation to achieve BNG is coming from. In addition, we feel this wording is unhelpful, as mitigation and compensation for environmental impact should be considered as a separate process from BNG, and BNG only applied once environmental impact, and the planning proposal, is considered acceptable. We understand that the BNG requirement will be compulsory anyway.

LP50: Residential site allocations in Wimblington

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

CommentObject

Both local primary schools at Doddington and Wimblington are on restricted sites and have no scope for expansion. There is currently limited space capacity at Thomas Eaton Primary School (Wimblington), however this is not sufficient to accommodate all the pupils expected to be generated from the proposed housing allocations in both villages. The Council has been negotiating additional land to expand Lionel Walden CE Primary School as part of a planning obligation associated with a proposed development at land east of Bevills Close Doddington (F/YR21/1072/FDL). If this is successful, then there would be some scope to expand the school.

Since the Council’s response was submitted, the planning application referred to above has been refused by the Fenland District Council Planning Committee. This has removed the opportunity for the County Council to secure the land necessary to expand the Lionel Walden Primary School. Without the ability to expand school places in either village it will not be possible to mitigate the scale of growth proposed in the Local Plan.

The Plan should demonstrate how this necessary infrastructure will be delivered.

Title:		Position:	
First Name:	Sam	Organisation:	Reeve Brown
Surname:	Lees		

CommentObject

40324 - Land at Roundabout Farm Wimblington, Wimblington CP

1. The Site is previously developed land.
2. The Site is in a sustainable location. Lit public / paved footpaths provide easy access to bus stops.
3. The Site sits between the existing Wimblington settlement boundary and provisionally designated employment land to the north (Site 40286).
4. Residential development to the north on the other side of the A141 has been provisionally allocated (Site 40382) within March.
5. The Wimblington settlement boundary is naturally defined by the A141 acting as a boarder. The Site lies to the south of the A141 within this natural boundary .
6. With the future provision of employment land to the north of the Site, the Site is likely to be in closer proximity to leisure and retail facilities than Sites that have been allocated for residential development to the south of the Site.
7. The Site would continue the development from Wimblington with dwellings already running along the periphery of the Site.
8. The Site is not disjointed from Wimblington. There is an existing line of development running to the Site which connects the Site to the rest of the development within Wimblington.
9. The Site benefits from very easy access to the A141 which would result in less traffic and noise pollution within the existing residential development to the south as future occupiers are likely to use the A141 as opposed to travelling through Wimblington.

LP50: Residential site allocations in Wimblington

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

Comment **Neutral**

There is the potential for sand and gravel to be located under site allocations LP50.01,02,04,03,05. Development should make best use of any material incidentally extracted.

LP50: Residential site allocations in Wimblington

Title:	Ms	Position:	Chartered Town Planner
First Name:	Shanna	Organisation:	Swann Edwards Architecture Limited
Surname:	Jackson		
Comment	Neutral		
land submission 40219			

The site physically adjoins the established built up settlement of Wimblington and is located within flood zone 1. It is therefore in a sustainable location which is in a sequentially preferable location in terms of flood risk.

Planning permission has previously been refused for development along the site frontage however the site now proposed would allow for comprehensive development which would link the Bridge Lane frontage with the remainder of the village. The site therefore overcomes previous concerns and would improve accessibility which would be to the benefit of existing residents.

There are no technical constraints which would restrict the allocation of this land. The land is immediately available for development and would adjoin other proposed land allocations. For the reasons above it should be allocated.

land submission 40217

The site physically adjoins the established built up settlement of Wimblington and other proposed land allocations and is located within flood zone 1. It is therefore in a sustainable location which is in a sequentially preferable location in terms of flood risk.

The site would allow for comprehensive development which would link the Bridge Lane frontage with the remainder of the village. The site therefore would improve accessibility which would be to the benefit of existing residents.

There are no technical constraints which would restrict the allocation of this land and the land is immediately available for development. For the reasons given above the land should be allocated.

land submission 40229

The site physically adjoins the established built up settlement along Bridge Lane and existing land allocations and is located within flood zone 1. It is therefore in a sustainable location which is in a sequentially preferable location in terms of flood risk.

The site would benefit from the use of footpath 263/5 enabling future residents good access to Wimblington village centre.

There are no technical constraints which would restrict the allocation of this land and the land is immediately available for development. For the reasons given above it should be allocated.

land submission 40488

The site physically adjoins the established built up settlement of Wimblington and is located within flood zone 1. It is therefore in a sustainable location which is in a sequentially preferable location in terms of flood risk.

There are no technical constraints which would restrict the allocation of this land. The land is immediately available for development. For the reasons given above the land should be allocated.

land submission 40496

The site physically adjoins the established built up settlement along Bridge Lane, surrounded by other proposed allocations and is located within flood zone 1. It is therefore in a sustainable location which is in a sequentially

LP50: Residential site allocations in Wimblington

preferable location in terms of flood risk.

The site would benefit from the use of footpath 263/5 enabling future residents good access to Wimblington village centre.

There are no technical constraints which would restrict the allocation of this land and the land is immediately available for development. For the reasons given above the land should be allocated.

Title:	Mr	Position:
First Name:	John	Organisation:
Surname:	Canton	
Comment	Support	
It is logical to allow the extension of the village to Eldernell Lane as there is established housing on the opposite side of the main road		

LP50.01

Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment	Neutral		
No comments			

LP50.02

Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment	Neutral		
No comments			
