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

As already indicated in our submission, there are several settlements in these categories that are served by a vacuum sewerage system. 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. Given the complexity of these systems and the lead in times for any improvements, this could have implications for proposed allocations within several Medium and Small Villages including: Wisbech St Mary, Gorefield, Parsons Drove, Tydd St Giles, Christchurch, Murrow, Guyhirn, and Church End.

Comment

Title:	Mr	Position:				
First Name:	John	Organisation:	Maxey Grounds			
Surname:	Maxey					
Comment	Object					
26.13 and descrip	26.13 and descriptions of some Small Villages - B					
Errors and omission	-					

There is an error in the section relating to Tydd St Giles. The paragraph 26.13 describes the wrong village (Tydd Gote) and thus there is no description of Tydd St Giles. This needs correcting

We would also suggest that there should be sections in this part of the plan for all Small Villages B and not just those where a specific allocation is proposed. Where there is no allocation then justification for why there is no proposed allocation should be given. The villages concerned are Ponders Bridge, Turves and Tydd Gote

LP51: Reside	ntial site allocations in Coates	
Title:		Position:
First Name:	MJ	Organisation:
Surname:	Hawkins	
Comment	Object	
The large areas i	dentified for housing development in Wh	ittlesey are all either underdevelopment already or will be

within 12 months or so. All but one are likely to be fully developed within a few years and that exception is likely to completed by 2030. You have made no provision for any new large housing sites in Whittlesey when existing sites are fully developed. However, you have made provision for approximately 439 houses in Coates. That indicates an increase in Coates' population of in excess of 1,000, which is not too far from a doubling of the present population. And Coates is a 'medium sized' village in the terms of your proposals. You appear to propose Coates taking the strain of new housing in Whittlesey Parish once existing developments in Whittlesey

have been completed. This is unreasonable. Sites in Whittlesey were put forward for housing development under the plan process but you have not included any of them in the plan. An example is the site in Eastrea Road next to the 'Larkfleet' site. The only valid reason for rejecting that site would be that it is potentially

liable to flooding. If you consider that it is so liable, you should look for other sites in Whittlesey itself. It is unfair to expect Coates to take strain of new housing. Your plan states that it provides an adequate

supply of land to meet development needs in full. I suggest that, in the case of Whittlesey, it does not do so.

The site in Coates that you have identified as LP51.01 is in open countryside and should not be allocated for development. The same applies to the next-door site identified as LP52.01 f or employment development. The fact that permission was previously granted for commercial development for the site on the corner of March Road and Eldernell Lane does not justify countenancing development of the two adjoining sites.

Title:	Mr	Position:	
First Name:	Colum	Organisation:	Cambridgeshire County Council
Surname:	Fitzsimons		
	Object		
Comment	Object		
The existing prim	ary school at Coates is on a restricted site	e which has no pote	ential for expansion beyond its current
capacity of 210 p	laces. The additional developments in the	e village will require	e a further 210 primary places. Whilst the
Council welcome	s that the allocated sites in Coates are red	quired to "Facilitate	e the re-location of Coates Primary

Council welcomes that the allocated sites in Coates are required to "Facilitate the re-location of Coates Primary School", the policy does not provide any certainty regarding the provision of a suitable alternative site (2.4ha is required) for the replacement school. Furthermore, the Council has concerns about the viability of this strategy as the policy does not indicate how both the replacement and additional school places will be funded.

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 all LP51 sites (01-04). Development should make best use of any material incidentally extracted.

LP51.01			
Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment No comments	Neutral		
Title:		Position:	
Title: First Name:	Isabel	Position: Organisation:	
	Isabel Boon		

Coates school is at near capacity and needs to be able to cope with the developments happening now and in the future, my concern is the relocation, this will leave the school land open to more development. Bird surveys will be done, alongside the qualifying bird species, especially foraging birds, which we have, these will be ignored, no matter what the regulations say.

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

Comment Support

I act for the owners of the land north of March Road Coates, who are in support of this policy and the reasons for its allocation set out in the evidence report.

We are actively working with a major developer to be in a position to start delivering housing on this site early in the plan period. The land is available and the owners willing for it to come forward.

We would seek clarification at an early stage regarding the meaning in the criteria for this policy of facilitate the relocation of Coates Primary School given that at this stage the IDP has not been published.

We are happy to work with the Council on advancing delivery of this site and the development strategy for Coates.

Title:	Mr	Position:	
First Name:	Peter	Organisation:	Peter Humphrey Associates Ltd
Surname:	Humphrey		
Comment The Draft allocatio	Object n is on goose & swan functional land.		

Draft allocation not in a logical location.

LP51.02 Title: Ms Position: Historic Environment Planning Advise First Name: Debbie Organisation: Historic England Surname: Mack Comment Neutral There are no designated heritage assets within the site boundary. The Conservation Area lies to the west of the site but with sufficient development between so there will be minimal impact. No comments. Title: Position: Senior Conservation Officer First Name: Daniel Organisation: RSPB Surname: Pullan Comment Neutral Allocation 51.02, p.147 As with allocation 49.02, whilst we recognise the need for this proposal to mitigate any evidenced recreational impacts on the Nene Washes SPA, as before, this needs to be done in the context of a project level HRA, and the policy wording should reflect this. As before, case law indicates that mitigation cannot be taken into account at the Likely Significant Effect (screening) stage of this process.	Title: First Name:	Debbie	Position:			
First Name: Debbie Organisation: Historic England Surname: Mack Mack Comment Neutral Surname: Neutral There are no designated heritage assets within the site boundary. The Conservation Area lies to the west of the site but with sufficient development between so there will be minimal impact. No comments. Surname: Position: Senior Conservation Officer First Name: Daniel Organisation: RSPB Surname: Pullan Comment Neutral Neutral Allocation 51.02, p.147 As with allocation 49.02, whilst we recognise the need for this proposal to mitigate any evidenced recreational impacts on the Nene Washes SPA, as before, this needs to be done in the context of a project level HRA, and the policy wording should reflect this. As before, case law indicates that mitigation cannot be taken into account at the	First Name:	Debbie	Position:			
Surname: Mack Comment Neutral There are no designated heritage assets within the site boundary. The Conservation Area lies to the west of the site but with sufficient development between so there will be minimal impact. No comments. Title: Position: Senior Conservation Officer First Name: Daniel Organisation: RSPB Surname: Pullan Allocation 51.02, p.147 As with allocation 49.02, whilst we recognise the need for this proposal to mitigate any evidenced recreational impacts on the Nene Washes SPA, as before, this needs to be done in the context of a project level HRA, and the policy wording should reflect this. As before, case law indicates that mitigation cannot be taken into account at the				Historic Environment Planning Adviser		
Neutral There are no designated heritage assets within the site boundary. The Conservation Area lies to the west of the site bound with sufficient between so there will be minimal impact. No comments. Title: Position: Senior Conservation Officer First Name: Daniel Organisation: RSPB Surname: Pullan Neutral Allocation 51.02, p.147 As with allocation +0.02, whilst we recognise the need for this proposal to mitigate any evidenced recreational impacts on the New SPA, as before, this needs to be done in the context of a project level HRA, and the policy wording shuld reflect this. As before, case law indicates that mitigation cannot be taken into account at the	Surname:		Organisation:	Historic England		
There are no designated heritage assets within the site boundary. The Conservation Area lies to the west of the site but with sufficient development between so there will be minimal impact. No comments. Title: Position: Senior Conservation Officer First Name: Daniel Organisation: RSPB Surname: Pullan Pullan Allocation 51.02, p.147 As with allocation 49.02, whilst we recognise the need for this proposal to mitigate any evidenced recreational impacts on the Nene Washes SPA, as before, this needs to be done in the context of a project level HRA, and the policy wording should reflect this. As before, case law indicates that mitigation cannot be taken into account at the		Mack				
First Name:DanielOrganisation:RSPBSurname:PullanSurname:NeutralCommentNeutralAllocation 51.02, viluation viluatio	There are no designated heritage assets within the site boundary. The Conservation Area lies to the west of the site					
Surname:PullanCommentNeutralAllocation 51.02, p.147As with allocation 49.02, whilst we recognise the need for this proposal to mitigate any evidenced recreationalimpacts on the Nene Washes SPA, as before, this needs to be done in the context of a project level HRA, and thepolicy wording should reflect this. As before, case law indicates that mitigation cannot be taken into account at the	Title:		Position:	Senior Conservation Officer		
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Allocation 51.02, p.147 As with allocation 49.02, whilst we recognise the need for this proposal to mitigate any evidenced recreational impacts on the Nene Washes SPA, as before, this needs to be done in the context of a project level HRA, and the policy wording should reflect this. As before, case law indicates that mitigation cannot be taken into account at the	Surname:	Pullan				
As with Allocation 49.02, it is unclear why the specific wording on BNG is included, as we understand that this will be compulsory element proposals, and we believe the mitigation/compensation wording is unhelpful in this context.	Allocation 51.02,					
Title: Mr Position:	As with allocation impacts on the Na policy wording sh Likely Significant As with Allocation	p.147 n 49.02, whilst we recognise the ne lene Washes SPA, as before, this ne nould reflect this. As before, case la Effect (screening) stage of this proc n 49.02, it is unclear why the specif	eeds to be done in the co w indicates that mitigation cess. fic wording on BNG is incl	ntext of a project level HRA, and the on cannot be taken into account at the luded, as we understand that this will be a		
First Name: Peter Organisation: Peter Humphrey Associates Ltd	As with allocation impacts on the Na policy wording sh Likely Significant As with Allocation compulsory elem	p.147 n 49.02, whilst we recognise the ne lene Washes SPA, as before, this ne nould reflect this. As before, case la Effect (screening) stage of this proc n 49.02, it is unclear why the specif nent proposals, and we believe the	eeds to be done in the co w indicates that mitigation cess. fic wording on BNG is incl mitigation/compensation	ntext of a project level HRA, and the on cannot be taken into account at the luded, as we understand that this will be a		
Surname: Humphrey	As with allocation impacts on the Na policy wording sh Likely Significant As with Allocation compulsory elem Title:	p.147 n 49.02, whilst we recognise the ne lene Washes SPA, as before, this ne hould reflect this. As before, case la Effect (screening) stage of this proc n 49.02, it is unclear why the specif hent proposals, and we believe the Mr	eeds to be done in the co w indicates that mitigation cess. fic wording on BNG is incl mitigation/compensation Position:	ntext of a project level HRA, and the on cannot be taken into account at the luded, as we understand that this will be a n wording is unhelpful in this context.		
o Object	As with allocation impacts on the Na policy wording sh Likely Significant As with Allocation compulsory elem Title: First Name:	p.147 n 49.02, whilst we recognise the ne lene Washes SPA, as before, this ne hould reflect this. As before, case la Effect (screening) stage of this proc n 49.02, it is unclear why the specif nent proposals, and we believe the Mr Peter	eeds to be done in the co w indicates that mitigation cess. fic wording on BNG is incl mitigation/compensation Position:	ntext of a project level HRA, and the on cannot be taken into account at the luded, as we understand that this will be a n wording is unhelpful in this context.		
Comment Object The Draft allocation is on goose & swan functional land.	As with allocation impacts on the Na policy wording sh Likely Significant As with Allocation compulsory elem Title: First Name: Surname: Comment	p.147 n 49.02, whilst we recognise the ne lene Washes SPA, as before, this ne hould reflect this. As before, case la Effect (screening) stage of this prod n 49.02, it is unclear why the specif nent proposals, and we believe the Mr Peter Humphrey Object	eeds to be done in the co w indicates that mitigation cess. fic wording on BNG is incl mitigation/compensation Position: Organisation:	ntext of a project level HRA, and the on cannot be taken into account at the luded, as we understand that this will be a n wording is unhelpful in this context.		
	As with allocation impacts on the Ne policy wording sh Likely Significant As with Allocation compulsory elem Title: First Name: Surname: Comment The Draft allocati	p.147 n 49.02, whilst we recognise the ne lene Washes SPA, as before, this ne hould reflect this. As before, case la Effect (screening) stage of this proc n 49.02, it is unclear why the specif nent proposals, and we believe the Mr Peter Humphrey Object ion is on goose & swan functional la	eeds to be done in the co w indicates that mitigation cess. fic wording on BNG is incl mitigation/compensation Position: Organisation: and.	ntext of a project level HRA, and the on cannot be taken into account at the luded, as we understand that this will be a n wording is unhelpful in this context.		

LP52: Employ	ment allocations in Coates		
Title:	Mr	Position:	
First Name:	Colum	Organisation:	Cambridgeshire County Council
Surname:	Fitzsimons		
Comment There is the pote	Neutral ntial for sand and gravel to be located un	der all LP52 sites (0	01). Development should make best use

of any material incidentally extracted.

LP52.01			
Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment No comments.	Neutral		
Title:	Mr	Position:	
First Name:	John	Organisation:	Maxey Grounds
Surname:	Maxey		
Comment	Support		

We act for the owner of the Land East of Ben Burgess at Coates and support the proposed allocation of this area for Employment development.

We agree that sited adjoining the Ben Burgess premises and PJ Thory haulage year the site is well suited for the proposed use. Access will be via Eldernell Lane and we are initiating discussions with the Highway Authority regarding the required detail of the access arrangements.

We agree that it is entirely appropriate to include some employment growth at Coates alongside the proposed residential allocations and this site is well places with regard to LP51.01 in minimizing travel to work (and vice versa).

LP53: Resider	ntial site allocations in Elm		
Title:		Position:	Graduate Planner
First Name:	Isabel	Organisation:	Strutt & Parker
Surname:	Ede		
Comment Land at Greeves	Neutral Farm, Begdale Road, Elm, south Wisbech.	SHEELA Ref: 40306	5.

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

This representation is a summary of the full Site Representation Report which has also been submitted as part of this consultation response, along with an updated Site Plan.

Elm is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is located to the south of Wisbech and is virtually linked by linear development along either side of Elm High Road up to the A47. It should also be noted that further growth is proposed to the south of Wisbech, taking it up the A47. As such whilst Elm is identified as a Medium Village it also has a close relationship with, and acts as a satellite settlement of Wisbech. Accordingly, this proximity and interrelationship makes it a highly sustainable location for additional growth.

Under Policy LP53.01 the Site the subject of this representation (40306) is allocated along with adjoining land to the east (40322) as a residential allocation for approximately 215 dwellings. The County Council supports this allocation and confirms that the Site is both deliverable and available for development and as such it's inclusion as a proposed allocation should be carried through to the submission draft Local Plan.

However, for the reasons set out above in respect of Policy LP2, it is also considered that further additional land should be allocated to secure sufficient housing development to support the objectives of the new Local Plan strategy. As such it is recommended that the proposed allocation LP53.01 should be extended in a westerly direction in order to increase the site's capacity. The proposed amended site is set out in Figure 4 below:

It is noted that the two other sites identified within Elm already have the benefit of planning permission and therefore site LP53.01 represents the only new allocation for the settlement. While the scale of the Site originally submitted under the 'Call for Sites' was more significant, it is recognised that Wisbech will grow in a southerly direction, up to the A47. With this growth it will be important that an area of countryside is retained on the south side of the A47 in order to reduce any further coalescence with Elm. Accordingly, the amended proposed allocation has excluded the northern part of the original submission site to ensure that an appropriate buffer is retained.

The original submission also included land on the western side of New Bridge Lane, while this land was in Flood Zone 1, it is acknowledged that the physical separation created by the Lane makes it less desirable for inclusion as part of the allocation. However, it is noted that under Policy LP14 a Gypsy & Traveller site with the benefit of planning permission is included as an allocation, meaning there will be development on the western side of new Bridge Lane.

Taking these factors into consideration it is therefore recommended that the allocation site should be expanded in an westerly direction, following the current alignment of the existing field drain which forms the proposed north western boundary of Site Allocation LP53.01 as far as New Bridge Lane. The extended southern boundary would then wrap around the north of the existing orchard located to the south.

It is acknowledged that the western part of the site would include land within Flood Zone 2, however, this area could become publicly accessible open space which will be an essential part of a residential development at this overall scale. Furthermore, creating a parkland style public open space will create an appropriate transition with new Bridge Lane and the proposed Gypsy & Traveller site to the west. This would also be of relevance having regard to the context of the orchard to the south. While the new Bridge Lane is not a designated public right of way, it is reasonable to conclude that if access is to be provided for a traveller site, pedestrian use may also be deliverable, and as such pedestrian connections could also be provided to the new allocation site. Such routes would help expand the

LP53: Residential site allocations in Elm

potential for leisure walking routes to and from the new allocation site.

It is acknowledged that the site allocation needs to be proportionate in relation to the scale of the existing settlement, however, the inclusion of the proposed extended allocation will not be at such a scale as to be considered disproportionate. Furthermore, it will allow the site to be developed in an efficient way making the best use of available land but allowing appropriate areas to remain undeveloped to be used to deliver public open space, areas for biodiversity enhancement and additional tree planting.

It is therefore suggested that Policy LP53 should be amended to include the following:

Conclusions:

For the reasons set out above in respect of draft Local Plan Policy LP2 it is considered that further site allocations need to be made to secure sufficient housing development to support the objectives of the new Local Plan strategy and for the Plan to considered 'sound' at examination.

Elm is identified as a Medium Village is a Medium Village and also effectively a satellite of Wisbech and therefore one of the most sustainable locations for development in the district.

The County Council support the partial allocation of Site 40306 under Policy LP53. However, for the reasons set out in the comments in respect of draft Local Plan Policy LP2 it is considered that further site allocations need to be made to secure sufficient housing development to support the objectives of the new Local Plan strategy. Whilst it is not suggested that the entirety of Site 40306 should be included in the allocation, as it is recognised that it is important to retain a countryside buffer with the south of Wisbech, it is considered that additional land to the west should also be included. This would allow the development potential of the site to be maximised, whilst still representing a proportionate scale of development for the existing settlement and allowing an efficient use of the site.

The inclusion of some of the western part of the site would facilitate the delivery of open space which can be used for recreational purposes, the enhancement of biodiversity and to create an appropriate buffer with the potential for a pedestrian connection with New Bridge Lane.

The Site could be delivered in the early years of the new Local Plan and is considered to be both deliverable and developable.

Accordingly, it is considered that Policy LP53 should be amended to include this extended allocation.

LP53: Reside	ential site alloca	tions in Elm
Title:		Position:
First Name:	MJ	Organisation:
Surname:	Hawkins	
Comment	Object	
-		g development in Whittlesey are all either underdevelopment already or will be

within 12 months or so. All but one are likely to be fully developed within a few years and that exception is likely to completed by 2030. You have made no provision for any new large housing sites in Whittlesey when existing sites are fully developed. However, you have made provision for approximately 439 houses in Coates. That indicates an increase in Coates' population of in excess of 1,000, which is not too far from a doubling of the present population. And Coates is a 'medium sized' village in the terms of your proposals. You appear to propose Coates taking the strain of new housing in Whittlesey Parish once existing developments in Whittlesey

have been completed. This is unreasonable. Sites in Whittlesey were put forward for housing development under the plan process but you have not included any of them in the plan. An example is the site in Eastrea Road next to the 'Larkfleet' site. The only valid reason for rejecting that site would be that it is potentially

liable to flooding. If you consider that it is so liable, you should look for other sites in Whittlesey itself. It is unfair to expect Coates to take strain of new housing. Your plan states that it provides an adequate

supply of land to meet development needs in full. I suggest that, in the case of Whittlesey, it does not do so.

The site in Coates that you have identified as LP51.01 is in open countryside and should not be allocated for development. The same applies to the next-door site identified as LP52.01 f o r employment development. The fact that permission was previously granted for commercial development for the site on the corner of March Road and Eldernell Lane does not justify countenancing development of the two adjoining sites.

Title:		Position:
First Name:	Pauline	Organisation:
Surname:	Rayner	
Sumanie.	Naynei	
Comment	Object	
	•	
There is no way t	hese houses can be built. Traffic and large	e vehicles is already really bad on Begdale Road, it is no
more than a cour	try lane Also what about school places	doctors surgery, everything is already overwhelmed, they
more than a cour	in y lance rise what about school places,	abelors surgery, everything is already over whether end , they

more than a country lane. Also what about school places, doctors surgery, everything is already overwhelmed, they will be so much more traffic and people with no extra amenities. We have hardly any buses also. Also at the top of Begdale Road by the church, there is a sign saying Unsuitable for Heavy Goods Vehicles, which is totally ignored as huge lorry's are in and out of the dairy on Begdale Road. So Definitely NO.

LP53: Residential site allocations in Elm		
Title:		Position:
First Name:	Michael	Organisation:
Surname:	Stallard	
Comment	Object	

Look, the traffic system is literally a century old. The roads simply are not sufficient for the traffic involved. The school is already full. There is no Health Centre this side of Upwell or Wisbech. We have just one little convenience store. The Pub and the Church are quite big enough though. Police? They cannot even cover Wisbech!

PS. Have you ever asked yourselves why so many people want to live "in the country"? Could it be that the towns are somehow changing for the worse? And why could that be?

You know this is unpopular. So why do it?

Title:		Position:
First Name:	Michele	Organisation:
Surname:	Porter	
Comment	Object	
Absolutely ridiculo	ous planning. Village infrastructure canno	ot cope with what we have. School not big enough to
accommodate mo	re students. Begdale road is a rat race fo	r traffic. Leave the village as it is don't ruin it.
	-	
Title:		Position:
First Name:	Syed	Organisation:
Surname:	Ahmad	
. .	Object	
Comment	-	
Against new house	es being built in Elm. This village will lose	its appeal if it becomes crowded which it will. This will
affect our propert	y value and of everyone else living in the	village

LP53.01		
Title:		Position:
First Name:	Pippa	Organisation:
Surname:	Cable	
-	Object over capacity already the schools and ame tion without more local traffic.	nities will not support another 400/500 people. The roads

LP53.01		
Title:		Position:
First Name:	Polly	Organisation:
Surname:	Godfrey	
Comment	Object	
The unsuitability	of Begdale road for a higher volume of Tr	affic

Begdale road is proposed to be the vehicular access to the site known as LP53.01 land north of Begdale road. The road itself is a B road which is signposted as unsuitable for heavy goods vehicles.

The state of the road is in poor repair with a multitude of potholes on the stretch of road leading east into the village from the proposed access. The road leading south-west before joining Redmoor lane again has a multitude of potholes, blind corners and subsidence of the road in multiple places.

The width of the road is a real concern with cars passing with difficulty along parts of the road. When 2 lorries meet on the road they can barely pass, relying on driving up onto paths and neighboring driveways. I myself have seen our fence knocked down by such an action so increased pressure of multiple lorries per day would seriously impact the road.

If each proposed house has two cars that would be an extra 430 cars driving up begdale road each day, this would be unthinkable as the road is simply not wide enough to accommodate the increased traffic. The only way to ensure safety on the road would be to widen it. This will be difficult in most areas due to houses frontages bordering the road.

I previously stated about the issues with construction traffic down begdale road such as lorries. They will worsen the state of the road by increasing the size of potholes, which already are large enough to spray water up local residents cars and house frontages. The subsidence already occurring will worsen and will take considerable work to improve.

If all of these points are not addressed and the development goes ahead I can envision a fatal crash happening down this road in the future because of the development.

Impacts of historic buildings down Begdale road

There are two grade-listed buildings on Begdale road, Appletree House and The limes. These are both within 80m of the proposed development. Historic ordnance surveys (researched on digimap) show both houses existing on the oldest ordnance survey in the 1880's.

The construction of the housing development would undoubtedly involve the piling of foundations which will cause vibrations. The tremors would shake both houses more than traditional buildings causing damage to the building. Lesser impacts of the vibrations would cause cracks to appear, with bigger tremors possibly causing tiles to slide off historic pantiles roofs and potential subsidence. The damage to both houses would take time and money to repair for the occupants, which is unreasonable.

Traditional Fenland view

The JNCC National Character Area: The Fens (NE424) states "The area is notable for its large-scale, flat, open landscape with extensive vistas to level horizons. The level, open topography shapes the impression of huge skies which convey a strong sense of place, tranquillity and inspiration".

The land north of Begdale roads is an exact match for the exert above. The development will ruin the view for many households along Begdale road, which have enjoyed this view for years. The housing development will truly be an eye-sore blotting out the big sky which the fens have become famed for.

The lack of a picturesque view and its replacement with a housing estate will devalue local properties. This is unfair to local homeowners who a trying to sell and this could decrease the local housing market.

Public Amenities

Schools

LP53.01

The village primary school is heavily oversubscribed as the school only has the capacity for 1 class of 30 per year. Therefore, many children from these new houses will have to find primary schools out of the village such as Fridaybridge or Wisbech. With over 200+ houses planned in Fridaybridge it is unlikely that they will be able to find places there as that school will become oversubscribed. The Cambridge Independent Newspaper writes "Cambridgeshire has 30 oversubscribed primary schools and 5 secondary schools, to overcome the problem of oversubscribed schools 17 new schools will have to be built, according to Cambridgeshire county council". This article dates back to 2019 so likely the problem has got worse. This development will worsen the issue with students facing overcrowding issues in classrooms and inadequate school facilities.

https://www.cambridgeindependent.co.uk/education/dozens-of-cambridgeshire-schools-are-oversubscribed-9067183/

Shop and Post office

The local plan states the village of elm supports a shop and post office. These in fact are both in the same small store, which boasts inadequate parking out front.

Paths

The development's main access point is located on Begdale road, this only has paths to the east of the site. If anyone wanted to walk to the public playing field they would have no paths to access this. They would have to walk on the side of the road already made dangerous by the increased traffic flow from the development.

Public Transport

Public transport through the village consisted of one bus the 56 which links Wisbech and March. This bus service is very irregular and does not run on time. Children attending Thomas Clarkson or Nealewade secondary school are likely to require bus transport. I used to commute to Neale-wade on the bus and was late on multiple occasions because of the poor bus service. Frequently the bus would miss stops and again on multiple occasions had to be taken to school by car or miss lessons completely.

Gritting roads

The local council does not grit Begdale road during the winter which can make roads and paths incredibly treacherous. Therefore, the increased volume of foot traffic and road traffic would make the situation more dangerous.

In summary, the development site is in an unsuitable location with limited public amenities that could not support the site.

Air Pollution

The proposed development is 1km from the intended location of the mega incinerator in Wisbech. This means the proposed development north of Begdale road will be in direct line with the incinerator's output plume which could contain noxious gases. I am worried about the long-term effects on the potential residents who could live in this development.

Construction and car air pollution

The development will require heavy machinery which will produce a large volume of carbon dioxide, particulates and dust. All the extra cars from the development will decrease the air quality of the surrounding area. These all could affect local residents health, especially with Begdale road having a large older population.

Environmental consideration

Elm has no wildlife sites in its vicinity, therefore removing more land which has the potential to support wildlife could reduce the biodiversity of the village. Many people enjoy the natural world therefore to do so must travel to other sites such as the local Nene wash which could degrade this RAMSAR, SPA, SAC and SSSI site. Also, the act of traveling to a wildlife site, which Elm as a village does not have, will have to be done by cars which greater pollutes the natural world.

Before any further development of the village is considered I believe a wildlife site must first be created to allow the

new and old residents of the village to connect with the natural world. The designation and funding of the Old canal path (not currently protected and run by local people) in Elm would be a good example.

Also, the development must stick to environmental policies such as Biodiversity net gain where 20% must be achieved by the development.

Enhancement of proposed houses and gardens must be up to ecological and environmental guidelines with the incorporation of bat slots, bee bricks, bird boxes, wildlife-friendly planting, hedgehogs holes and many more

Without biodiversity net gain and the enhancement of the houses through bird boxes, bat slots and bee bricks the housing development could become a wildlife sink, ruining the effects of local volunteers to improve the village's biodiversity.

Retention of the woodland area to the south

I am heartened to hear about the retention of the woodland to the south which supports species such as green woodpeckers, roe deer and hedgehogs. However, personally, this area is only 0.5ha compared to a 10ha development. The area to the south of the development should be a linear wildlife strip of around 5m to allow movement of foraging animals such as hedgehogs, grass snakes, bats and newts which all have records in the area. This will also link up an ancient hedgerow and rewilding site owned by private properties.

Without these environmental considerations, the development should not go ahead because of the harm it would cause the wildlife and the surrounding environment.

Protected species present in the area

Bats

There are many local records for bats around Begdale road. The barn along the proposed access track has the potential for bats to be roosting within it. Therefore, will need emergence surveys before any demolition can occur. If the correct assessment is not completed this could destroy a roost which is illegal under the Wildlife and Countryside Act 1981. Furthermore, the area of the development could support foraging bats along ancient hedgerows and dyke boundaries. As the proposed development is a large area I believe bat transects should be completed to determine the use of the site by bats.

Furthermore, the lighting of the new development could seriously impact foraging bats and a lighting scheme should be in place to reduce the impact.

Water voles

The ditches/dykes bordering and running through the development have the potential to support water voles with records being noted in the area. If these ditches are to be backfilled this could destroy valuable habitat.

Newts

The ditches also have the possibility of supporting newts which if backfilled would destroy their breeding habitat. Also, the field margins and dyke banks contain rough grassland which is good amphibian foraging habitat.

Reptiles

Grass snakes have been noted on the southern boundary of the development and due to their transient nature are likely to be throughout the development area using the ditches to commute and forage. A series of surveys would be needed to determine the usage of the site by this species and other reptiles.

Birds: Breeding and Wintering

Skylarks are known to breed across the entire development site and as a red-list farmland bird it is important they should be conserved. Other red and amber list species observed in the development area include turtle dove, stock dove, yellowhammer, black-headed gull, green woodpecker, swallows, house martins and swifts. With this extensive list, I believe it is necessary to conduct a breeding bird survey to consider the bird species which would be directly

LP53.01

impacted by the development. Also, redwing and fieldfares are known to forage within the local orchards and hedgerows which could be impacted by the development which would fragment their habitat.

The known and potential presence of so many protected species is a real source of worry for me and others. Without proper surveys and consideration this development could seriously damage to wildlife and the local ecology.

Flooding and Drainage

I am seriously concerned about the location of the development and the potential filling in of dykes that run through the site. The fields in this area are known to flood after periods of torrential rain, I myself have witnessed this on multiple occasions, especially in the winter of 2020-2021.

The dykes running through the development are directly connected to the drainage board and into the Nene wash. If these were to be filled in it's quite likely the development would suffer from flooding or make other properties flood.

Heritage of the area

The Cambridgeshire fens are historically known for farming with good quality soils. Developing this area equates to 10ha less of quality agricultural land which deprives local farmers of income and the nation of food.

I am disappointed in the local council for not notifying residents about the creation of this local plan. Residents within the road and village have been left to notify others about the proposed development. This is unfair as some people could be missed and are not able to share their valuable insights and opinion.

LP53.01			
Title:	Mrs	Position:	
First Name:		Organisation:	
Surname:	Goodrum		
Comment	Object		

The housing development to the rear of my property will ruin my views of the fields to the A47, currently I enjoy watching the wildlife such as deer, bats and owls as well as the tractors working in the agricultural fields. The development would replace this beautiful fenland landscape with brick and concrete displacing the wildlife which makes its home here.

Begdale Road is a narrow road where 2 cars struggle to pass and cars have to give way to larger lorries. Begdale Road is in an awful state of disrepair with many potholes and uneven surfaces. The pathways do not reach Begdale field so walking in this direction would be unsafe due to the access to development near to the field. The pathways are currently only on one side of the road so to reach local shop and post office the road needs to be crossed repeatedly which would be unsafe with increased traffic from the 215 houses.

Flooding is a concern over the years i have seen a lot of flooding and large areas of water laying on the field even attracting 100s of gulls to visit. To build this development dykes would need to be filled so I'm afraid the excessive water will flood my own garden as it borders the development.

Elm relies on amenities in Wisbech such as doctor's surgeries which i feel would be unable to cope with even more patients trying to access their services - even now it is very difficult to get a doctor's appointment. The bus service is very limited and regularly stopped if a road closure happens, so if you don't have your own car it is very difficult to get to Wisbech for shopping or appointments. The Elm school has 1 class of 30 children per year group, how would the school cope with a further 215 family homes built in Elm?

I enjoy walking in the village and the walk along Halfpenny Lane is very beautiful as fields and wildlife can be seen in all directions. The development will make walking to access the green spaces, shop and post office much more difficult as the traffic along Begdale Road will be increased making the roads dangerous to cross. Begdale Road and its pathways have never been gritted since i have lived here, which limits me from leaving my home, therefore I feel Begdale Road is unable to support such a large development.

LP53.01		
Title:	Mrs	Position:
First Name:		Organisation:
Surname:	Godfrey	
Comment	Object	

I am very concerned about the housing development which will be to the rear of my garden and will spoil the views from my windows and garden, at the moment i can see across the fields to the A47 and enjoy seeing the wildlife and agricultural machinery working in the fields. I have lived here for 78 years and would ruin my joy of looking out of my windows.

I am also concerned about the increased amount of traffic to Begdale Road. At the moment Begdale Road is very narrow and only just wide enough for 2 vehicles to pass, if you meet a lorry on this road you need to pull over to allow it to pass. The road is full of potholes and in awful disrepair. Begdale Road has never been gritted and is very unsafe in winter months, when the weather is icy I am unable to leave my house by car or walking. The housing development would increase the traffic making the road very dangerous to use and feel Begdale Road is unsuitable for this development.

Elm and Wisbech have limited amenities, it is very difficult to get a doctor's appointment when needed, the buses are unreliable - this week due to road closure the bus service from Elm to Wisbech failed to run therefore unable to visit Wisbech to get shopping. The village school currently has 1 class of 30 children per year group I feel the school would be unable to cope with the children from a 215 family houses. All our limited local services would be overrun by an additional 215 houses and would fail to cope.

Over the years i have seen lots of flooding in the fields, so am concerned the additional housing and removal of dykes to allow the building of the housing would cause flooding to my property which borders the development.

I am very concerned about the increased traffic and lack of pathways, the increased traffic would make it very difficult and unsafe to walk towards the Begdale field to see the recent tree planting as lacks a pathway, It would also make it much more difficult and dangerous to cross the roads to reach the village shop and post office.

LP53.01		
Title:		Position:
First Name:	Simon	Organisation:
Surname:	Clarke	
Comment	Object	
	lanning Application	

Stance: Customer objects to the Planning Application Comment Reasons:

It's clear from discussing with the residents of Begdale road that no one was aware of this proposal until a few days ago! Even two members of the Elm parish council were unaware. Why has this not been communicated correctly with the village residents?

This proposal must be communicated correctly around the village to allow all residents the chance to consider and provide their comments. At present this has not be done and you will not receive a fair response.

When I moved to the village, I was not aware of such development proposals. I have also recently completed an extension. If I knew of such developments I would not have moved to this village nor completed my extension.

The estimated population figures dated mid-2018 are clearly outdated and not a true reflection of the current village population.

The village has limited services meeting day to day needs. There is one shop for the village which also has a post office counter. It doesn't even have a small bus shelter.

There would have to be major works involved to move the overhead pylon lines or reposition them.

The A47 and the new proposed incinerator in Wisbech will also be in close proximity to the development site.

- Access is unacceptable onto the Begdale road and opposite a busy self-storage facility which operates 24/7. Heavy machinery and caravans use this entrance. How many entrance points will there be and where are the proposed locations?

- Agricultural land – The land should remain as this and should be protected against development. What grade land is this?

- Anti Social behavior – There has been several incidents within the last year which involved the police. One being arson.

- Backfill – What is the plan for this?

- Density/Over development – The 5/10 year proposals would turn Elm village into the size of a small town.

- Design/Appearance – It is not in keeping with the village appearance. What is the proposed scheme for social housing, first time buyers and executive homes?

- Devaluing property – A local estate agent has advised the executive homes on Begdale road would be devalued by 20/25% if the proposal was passed. Also, all houses nearby would be devalued in general.

- Drainage – The fields flood often.

- Environmental Concerns

- Flooding – Has a full survey been completed?

- Light Pollution – The proposed lighting would affect all properties to the rear. At the moment there is no light pollution at the rear, this is why we can see the bats.

- Local services/schools - unable to cope - Loss of view/Outlook. The NHS has already advised against another development within the village which is smaller.

- Noise – 5 years of building works around our properties. Additional vehicles, deliveries, workers which goes against a quite village.

- Out of character/not in keeping with the area.

- Outside DAB

- Overlooking/loss of privacy – The proposal would surround the executive homes and the properties on Begdale road completely.

- Parking arrangements are limited in the village and there is currently no bus route down begdale road. Residents would have to drive or walk to the village church for a bus connection.

- Proximity to property – The proposed entrance is next to my property, if each house has one vehicle it would be nonstop motor noise all day/night.

- Residential Amenity – The village is not able to cope with 215 new homes. Please note, two further sites in Elm have also been considered. It's unbelievable.

- Traffic or Highways – The Begdale road is not wide enough to accommodate such traffic and it cannot be widened further in places. The majority of the road does not have footpaths or street lighting.

- Trees - the fields and surrounding area would need to be cleared.

- Visual Impact

- Waste/Litter - Has Anglian water confirmed they can deal with the volume of water for this development?

- Wildlife Concerns – Bats live in the barn where the access road is planned to be. Owls and deer live in this area also. Has the environmental agency reviewed this?

- Would set a precedent

Reading through the documents, there is much against these properties being built. LLFA are still raising concerns with flooding, the NHS has said there is no room for more patients unless more money is found I note a submission listed on F/YR16/0545/0, the school I know does not have room and are also against it.

Has the school confirmed they have space?

LP53.01		
Title:		Position:
First Name:	Georgina	Organisation:
Surname:	Siracusano	
Comment	Neutral	
Ũ	•	ill there be consideration for surrounding roads which are in

a poor state of affair? I feel that the number of houses may be slightly excessive and maybe too many additional residents for such a small village and small school. Is there consideration for additional services such as school and GP surgery? It would be positive to have more families residing in the village as my daughter does not have much opportunity to play and make friends as there are no children living close by. Would there be consideration for a park due to the number of homes and the park in the village is not adequate.

Title:		Position:	
First Name:	Christina	Organisation:	
Surname:	King		
Comment	Object		
Comment			

I am objecting to the suitability of Begdale Road being intended for the access site for the proposed development for the following reasons. I am also objecting to the suitability of Elm for additional housing due to lack of infrastructure. Begdale Road is already designated as unsuitable for HGV vehicles due to its narrowness, lack of pavements and unsafe bends.

There is very limited access to pavements in Begdale Road, and where pavements do exist, pedestrians have to cross to the other side of the road several times. With the additional increased volume of builders heavy vehicles and then extra cars of 215 homes, this raises the risk of a serious road accident.

The pavements stop prior to where the access site is proposed, and past this site is Elm playing field. Pedestrians, children wanting to play football etc, joggers, and dog walkers have to use the road which has a dangerously steep camber, as there is no pavement to access the playing field. This is obviously currently dangerous, but danger of future accidents will be significantly increased with the additional excess traffic caused by development traffic and then cars of 215 new homes.

Begdale Road as stated is narrow and has several poorly sited bends. There is an Equestrian Centre, and Caravan Site in Begdale Road, so there are lots of caravans being towed to and from Little Ranch, and horse riders virtually daily use Begdale Road. Begdale Road is in a rural agricultural area and sees heavy and large tractors and farm machinery also daily using this narrow road. In addition, there are many walkers, joggers, runners and dog walkers frequently using the road at all times of the day. Obviously, any additional volume of traffic increases the risk of serious accidents.

In addition to my concerns regarding Begdale Road as the access site. I am also concerned that Elm as a village cannot provide the infrastructure required for these additional houses. The local Elm primary school is over subscribed. We have no Elm access to a General Practitioner Surgery. There are no substantial transport links, no train link, no local bus on a Sunday, and during week days buses are limited to a one hour service and then only to late afternoon. There is one very small convenience store / post office, which does provide a local service. However, probably because of the limited transport links, most of the additional 215 homes will need to use their cars to travel further afield for General Practitioner and Hospital appointments, plus school runs, shopping etc which will substantially increase the volume of traffic use in Begdale Road, which is narrow and has dangerous cambers, and dangerous blind bends, so is totally unsuitable for access to the proposed additional homes for Elm.

LP53.01		
LF33.01		
Title:	Mr	Position:
First Name:	Peter	Organisation: Peter Humphrey Associates Ltd
Surname:	Humphrey	
Comment	Object	
	ion is too large for existing Lim	ited Growth Village.
Title:		Position:
First Name:	Vicky	Organisation:
Surname:	Harcourt	
Comment	Object	
I'm totally agains volume a site thi not cope with a p without this mar neck exit from El towards Tesco as	st this development, the sheer s big would cause is unimagina potential 200-400 children in El ny people to add to it. Begdale m towards Wisbech onto Elm r s it is in the mornings if you exir illy 400+ cars this estate would	size of it for our small village is ridiculous. The amount of traffic ble with a potential 400+ cars in our village. The small school would m. The local doctors and dentists in our town are at capacity already road is too small to deal with this traffic, not to mention the bottle road. It's a risk each time you try to get onto the small roundabout t that way. Rush hour traffic is diabolical at these exits from our village
seeing the deer a countryside shou	uld be left as it is. The developm ses in our village as no doubt th	bring. There are wildlife living all over those fields and I for one enjoy wish to see a concrete jungle in its place from my windows. The nent is literally the size of Elm!! We are a village not a town. Also it'll ne crime rate rate will rise. We do not have the infrastructure to deal
seeing the deer a countryside shou devalue the hous	uld be left as it is. The developm ses in our village as no doubt th	wish to see a concrete jungle in its place from my windows. The nent is literally the size of Elm!! We are a village not a town. Also it'll

Surname: Sampson
Comment Object

Roads will not cope with more traffic

Schools are not big enough

Not enough doctor available

Local wild life and bird life will be impacted.

Air pollutants to village and spoiling peace and quiet

LP53.01		
Title:		Position:
First Name:	Dale	Organisation:
Surname:	Hollis	
Comment	Object	
changed to cop		to handle all them extra cars. The infrastructure isn't there and can't be
changed to cop		Position:
changed to cop Title:	e.	Position:

The proposal of 215 new dwellings to the bottom of Halfpenny Lane, Land off Limes Avenue. This application is not suitable for the village, with there being a lack of amenities and services now, another 215 houses with multiple people is not going to help the situation. If anything make it dramatically worse. The roads in the vicinity of the site are not suitable to cope with such extra traffic. The current village school is already over capacity and this ridiculous proposal means children will be travelling a far to attend education. Local doctor's surgery's can not cope with the large number of current patients, allowing more homes and greatly increasing the Elm population will only add to the already broken system. There is already a lot of new developments in the village which we do not have the facilities for, adding more will only hurt and ruin this once beautiful village.

LP53.01		
Title:		Position:
First Name:	lan	Organisation:
Surname:	Barker	
	Object	

Comment Object

As local people living adjacent to this site, we have not been informed of this proposed development of 215 houses being built.

The traffic per day of approx. 400 plus vehicles coming in and out this development onto a small village road which has limits to two vehicles passing each other is already dangerous. Plus, it has a 60mph speed limit.

There is only one school in Elm which is full and no Doctors surgery. Other surrounding Doctors surgeries are also full.

The traffic already trying to get out of Elm which is only one road is horrendous already at any time of the day. The roundabout at the junction with the A47 causes enough delays already so what would it be like with even more vehicles.

The number of lorries using Begdale Road to enter and exit the proposed site would cause problems for us who live in houses on Begdale Road with the noise & pollution. Which will devalue our new property because it will be overlooking a housing estate.

I have only just moved into a new house overlooking this proposed site and cannot think of anything worse that 215 houses being at the bottom of my garden with them being built with the noise and disruption of building work for weeks/years.

What about the deer that roam in this site plus other wildlife you will be destroying and taking even more Green Belt Land. By building on the Green Belt Land, you will be causing even more flooding. There are overhead power lines and pylons that these proposed new houses will be built under, what about concerns of Cancer to children.

Title:		Position:
First Name:	Davina	Organisation:
Surname:	Green	
Sumame:	Green	
	Object	
Comment	Object	
Traffic is very ofte	en gridlocked through this small village. A	Adding to this by building over 200 more homes increasing
car journeys by 2/300 a day is crazy! If I wanted to live in a busy town I would have done so		
, , , , , , , , , , , , , , , , , , ,		

LP53.01		
Title:	Mrs	Position:
First Name:	Jennifer	Organisation:
Surname:	Barker	

Comment Object

Local people adjacent to this site have not been informed of this development, there has been no notices posted on poles or literature put through letter box.

The traffic from this development up to 400-500 vehicles movements per day onto a small village road that can barely have two vehicles passing each other is dangerous. And this road has a 60mph speed limit.

There is only one tiny school in Elm which is full so where would the children go. Also no local Doctor surgery and surrounding surgeries are full.

The amount of traffic trying to get out of Elm, on the only road, is horrendous now at any time of the day. Congestion at the roundabout on the A47 is horrendous which will cause even more delays.

The International Agency for Research on Cancer declared that there was a possible cause of childhood Leukaemia for those who live near power lines. There are power lines and pylons across this piece of proposed building land.

I have just had a new house built overlooking this proposed site and I cannot think of any thing worse than 215 houses at the bottom of my garden. Plus the noise & pollution of these houses being built.

Title:		Position:
First Name:	Nigel	Organisation:
Surname:	Glover	
Sumanie:	Glover	
	Object	
Comment	Object	
Lam in objection	to this proposed development due to the	size of the development and the serious lack of suitable

I am in objection to this proposed development due to the size of the development and the serious lack of suitable infrastructure in the village.

The roads connecting to the site as well as throughout the village are already in a deteriorated state. Adding a new development of 215 dwellings will bring in circa 300-400 vehicles on to already poor roads.

There is no doctors surgery or dentists in the village or connecting villages, with residents having to use the facilities in wisbech which are already at breaking point.

The local village school as well as the local secondary schools are at capacity, how are they expected to cater for 200 more families?

Begdale road, where the proposed development is to be placed, is not suitable at present for the current population, let alone a higher number of users. The road itself is not only in a poor condition but also not wide enough to cater with a larger volume of traffic.

I'm happy to be contacted to discuss my points further.

LP53.01		
Title:		Position:
First Name:	Wendy	Organisation:
Surname:	Allen	
The village would built to the back There is no infra- in Wisbech are a Drainage in the not be able to co There is no public cars and traffic a Whilst I underst nobody would b	Id not be able to handle of Gosmoor Lane. astructure or amenities already over subscribed village is poor with a n ope with the extra hon lic transport to enable going through the villag and that people need to penefit from this develo	umber of homes flooding over the years. The current drainage system would
Title:		Position:
First Name:	Simon	Organisation:
Surname:	Hills	
Comment The infrastructu	Object ire of Elm is not suitabl	e.
Title:	Mr	Position:
First Name:	John	Organisation: Maxey Grounds
Surname:	Maxey	
Comment	Support	

We act for the owner of the eastern part of this proposed allocation (site ref 40322) who is supportive of the draft policy.

It is understood that the remainder of the site is owned by Cambridgeshire County Council and our client is happy to work with the County Council to achieve delivery of the site.

The location of the site is well related to the built environment of the village, with housing on parts of three sides, and there are opportunities for multiple access points to my clients part of the site, as well as the new access from Begdale to the County section noted in the draft policy.

We can confirm that the site is available and the owner will work towards early delivery of development on this site.

LP53.01			
Title:	Ms	Position:	Parish Clerk
First Name:	Suzanne	Organisation:	Elm Parish Council
Surname:	England		
There have been The scale of devel	Object ady unrecognisable due to extensive resident no perceivable improvements to infrastru- lopment which would result if these sites ructure, including; improvements to highw	ucture which has ad were included in th	ded strain to local services. The plan is impossible without large scale
Title:		Position:	
First Name:	Susan	Organisation:	
Surname:	Squires-Dutton		
Comment I am concerned th locally.	Object nere is no infrastructure for the extra hou	ses, one little shop,	no doctors or NHS dentists available
The condition of Begdale Rd isn't suitable for heavy construction traffic and extra cars, possibly 2 per house. Begdale Road is already a rat run, the whole road including the dairy would need 30mph limit as people speed past the last houses already. Lots of people walk their dogs along the road and there is no footpath. Extra cars would make it very dangerous, and there would be more pollution from petrol fumes.			
Title:		Position:	
First Name:	Paul	Organisation:	
Surname:	Squires-Dutton		

Comment Object

Begdale Rd is totally unsuitable for a development of this size (200-400 extra vehicles). It is barely wide enough for two lanes of traffic especially on the blind bends by the Milk and More depot. We get a lot of speeding traffic, and it gets used as a 'rat run' whenever there are delays on the A47.

The road isn't suitable for lorries, they would not be able to pass each other. A lot of people walk along this road and as there is no footpath going out of the village from the entrance to the proposed site towards Wales Bank, cyclists, pedestrians and horse riders will be at considerable risk. And the speed limit is 60mph!

LP53.01		
Title:	Miss	Position:
First Name:	С	Organisation:
Surname:	Merrell	
Comment	Object	

The residents of Begdale road were not aware of this proposal until a few days ago. Why has this not been communicated correctly with the village residents when it directly affects them?

This proposal must be communicated correctly around the village to allow all residents the chance to consider and provide their comments. At present this has not be done and you will not receive a fair response.

When I moved to the village, I was not aware of such development proposals.

The estimated population figures dated mid-2018 are clearly outdated and not a true reflection of the current village population.

The village has limited services meeting day to day needs. There is one shop for the village which also has a post office counter. It doesn't even have a small bus shelter. Many elderly people have no where to even sit to wait for a bus. Let alone the infrastructure required for this proposal.

There would have to be major works involved to move the overhead pylon lines or reposition them. Including the electricity and communication lines that run at the bottom of the BEGDALE road gardens. This would have to be removed post to post along each residential property.

The A47 and the new proposed incinerator in Wisbech will also be in close proximity to the development site. This proposed site was not taken into the planning considerations for the new proposed incinerator yet would be directly affected by this development.

- Access is unacceptable onto the Begdale road and opposite a busy self-storage facility which operates 24/7 opposite the proposed entrance to these properties. Heavy machinery and caravans use this entrance.

Current Road Infrastructure- Lorries, tractors, horses use this route frequently. This is also a major A47 diversion route. This road cannot take the infrastructure of current vehicles.

Outside residential properties this road has a national speed limit of tempeh, directly onto road facing properties. At points down the road you cannot fit two vehicles side by side. Cars have to wait for one another to go down the road, this also cannot be widened due to current houses boundaries onto the road.

-Current increase in traveller sites to the area that also use this road as their entrance, which increases traffic capabilities onto the road.

-Multiple pre planning, planned, or passed applications are also in place for this area and road in particular. How will all of these affect the village itself. It is not just one application there are too many applications.

- Agricultural land – The land should remain as this and should be protected against development. What grade of farming land is this?

- Anti Social behavior – There has been several incidents within the last year which involved the police. One being arson.

- Backfill – What is the plan for this?

- Density/Over development – The 5/10 year proposals would turn Elm village into the size of a small town.

- Design/Appearance – It is not in keeping with the village appearance. What is the proposed scheme for social

housing, first time buyers and executive homes?

- Devaluing property – A local estate agent has advised the executive homes on Begdale road would be devalued by 20/25% if the proposal was passed. Also, all houses nearby would be devalued in general.

- Drainage – The fields flood often as do the houses built in front of it, it is a noted problem.

- Environmental Concerns

- Flooding – Has a full survey been completed?

- Light Pollution – The proposed lighting would affect all properties to the rear. At the moment there is no light pollution at the rear. This is a reason for the strong presence of wildlife, including badgers, bats, deer.

- Local services/schools - unable to cope - Loss of view/Outlook. The NHS has already advised against another development within the village which is smaller.

- Noise – 5 years of building works around our properties. Additional vehicles, deliveries, workers which goes against a quiet village.

- Out of character/not in keeping with the area.

- Outside DAB

- Overlooking/loss of privacy – The proposal would surround the executive homes and the properties on Begdale road completely.

- Parking arrangements are limited in the village and there is currently no bus route down begdale road. Residents would have to drive or walk to the village church for a bus connection. Car parking is an issue with houses already on BEGDALE road. Lorries currently accessing the dairy cannot get passed such vehicles throughout the day and night.

- Proximity to property – The proposed entrance is next to our property, if each house has one vehicle it would be nonstop motor noise all day/night.

- Residential Amenity – The village is not able to cope with 215 new homes. Please note, two further sites in Elm have also been considered. With this also being considered it would be a complete nightmare for infrastructure.

- Traffic or Highways – The Begdale road is not wide enough to accommodate such traffic and it cannot be widened further in places. The majority of the road does not have footpaths or street lighting.

- Trees – the fields and surrounding area would need to be cleared.

- Visual Impact

- Waste/Litter – Has Anglian water confirmed they can deal with the volume of water for this development?

- Wildlife Concerns – Bats live in the barn where the access road is planned to be. Owls and deer live in this area also. Has the environmental agency reviewed this?

- Would set a precedent

Reading through the documents, there is much against these properties being built. LLFA are still raising concerns with flooding, the NHS has said there is no room for more patients unless more money is found I note a submission listed on F/YR16/0545/0, the school I know does not have room and are also against it.

Has the school confirmed they have space?

LP53.01		
Title:		Position:
First Name:	Louise	Organisation:
Surname:	O'Connor	
Comment	Object	

1052.04

The infrastructure of the area will not take the proposed new dwellings and the extra people and traffic they bring with them. Begdale Road is not wide enough for two cars to easily pass each other in places and it does not have a footpath along its length for pedestrians to be safe. Lighting is negligible along the length of the road. No allowance has been made for at least another 200 cars and associated vehicles using it. No kerb and Road probe to pot holes and collapse at edges.

This leads on to main road through village which would also struggle to cope with the extra traffic. The village drainage is also a problem in this area and would be made worse by more homes.

200 plus new homes will increase the number of children needing primary education and the village school is not equipped or large enough to cope with this.

200 plus new homes will need access to a variety of services such as GP's, hospital, dentists, public transport, shops etc. all of which are deficient in the area especially with the addition of other new homes in the local area.

The area of proposed development is home to wildlife/ecosystem which will be displaced/altered to the detriment of the surrounding area.

Why would we use Grade 1 agricultural land to build on when there are many brownfield sites? Why use grade 1 agricultural land to build on when the current world situation proves we need to preserve our agricultural land to farm to feed our country for the future? Fenland is known for its farming community which helps feed the UK.

The area of proposed development is in the conservation area and the extra people, traffic, noise, development all would be to the detriment of the conservation area. Why protect something special and then bulldoze it?

LP53.01		
Title:	Mrs	Position:
First Name:	Trudy	Organisation:
Surname:	Godfrey	
Comment	Object	

The proposed housing development in Elm is accessed by Begdale Road which is extremely narrow, barely able to accommodate 2 cars to pass each other and when approached by a larger vehicle, such as a lorry, one of the vehicles has to stop and pull to the side of the road to enable the other to pass. The road is in a poor state of repair with numerous potholes and uneven surfaces. The development could increase the volume by another 500 cars all needing to use Begdale Road for access, which would render the road extremely dangerous, impacting further on its current poor state and I'm sure at peak times making it very difficult for existing householders to enter or leave their properties. A high volume of HGVs transporting building materials to the site would further destroy the road and create chaos for local homeowners.

The current views from our property looking to the north towards the A47, encompass stunning views of our Fenland landscape which are enjoyed by many householders, proximity to natural spaces are very important for the well-being of residents, many of which have lived on Begdale Road for decades. The proposed site LP53.01 currently provides a home for a multitude of wildlife including roe deer, muntjac, hedgehogs, voles, grass snakes and many species of bird including tawny owl, green woodpeckers and even red listed birds such as turtle doves and stock doves. The dykes are home to frogs and their tadpoles as well as water voles. Bats frequently forage through our garden towards the fields beyond and along the ancient hedgerow which borders the site to the woodland area beyond perhaps even roosting in the grain store, surely this important site should be protected.

There are 2 grade listed houses on Begdale Road bordering the development which have floating foundations, the impact from the building of the development from traffic and piling would potentially cause extreme damage to these buildings in the form of cracks and subsidence therefore the impact to these buildings should be considered. Surely their historic importance to the character of the village should be preserved.

Elm has a small village school which can accommodate 30 children per year group, in the year 2000 the school was oversubscribed and was unable to accommodate all parents wishing to send their children to the local school. How will the school be able to cope with a further 215 family homes, even if on average each house has 1 child that is over 200 children which will need to access the local schools. Elm residents use doctor's surgeries and dentists located in Wisbech these are already unable to cope with the volume of patients, it is currently very difficult to gain a doctor's or dentist appointment. A further 215 houses would severely impact these essential services.

Our garden and the proposed development site often floods during the winter months, even though it currently benefits from drainage systems in the form of dykes. The development would remove these dykes and the subsequent buildings and concrete roads would cause the displaced water to flood existing neighboring properties. The proposed site would also be detrimental to the quality of the air caused by the building works and increase in traffic.

Policy LP53.01 - Residential site allocations in Elm, this proposed development was not communicated to any of the residents bordering the site. Many of us were only made aware by hearing from neighbours or social media, as there is a deadline for comments surely the proposal should have been communicated to affected residents by post, to give all residents including elderly people an equal chance to submit their comments, making sure all points of view could be considered. I feel the lack of communication is very disappointing and excludes many members of the community from airing their views.

LP53.01		
Title:		Position:
First Name:	Emma	Organisation:
Surname:	Hills	
Comment I object because	Object of the traffic it will bring to the	village, it will be unsafe.
The school will n	ot cope with more children, wit	h the amount of families moving to the village.

This is a village not a town.

Title:		Position:
First Name:	Kevan	Organisation:
Surname:	Godfrey	

Comment Object

I am very concerned about the increase in road traffic down Begdale road. The road currently experiences a high volume of traffic, especially when the A47 is blocked and everyone uses the road as a diversion. The state of the road is in disrepair with large potholes, which regularly splash water and grit up cars damaging them. The road is simply not wide enough to support over 400 new cars from the development. It's an accident waiting to happen.

The construction traffic will worsen the state immeasurably. Already lorries can't pass each other down the road, and results in destruction, with our fence previously being knocked down.

The paths in Elm are already limited so require crossing busy roads and at some points non existent. I am concerned about families from the development wanting to use the playing field, however, there is no path to it. This means they will have to walk along the busy road, made worse by the development. Existing residents will be subjected to busier roads when walking to the village centre to access the shop and post office resulting in making the crossing of roads more dangerous.

The local school is already full, therefore any new children would have to find positions in schools further out. This means families might travel long distances to reach a school. This would make the roads in the area being even busier.

Begdale road contains multiple grade-listed mid 19th century houses which have stepped-out/floating foundations. This means the vibrations from piling foundations will really affect the older houses. Cracks could form easily, the closer piling might loosen tiles and cause subsidence.

Stretching through the development from halfpenny road to begdale road, metal detectors regularly find medieval finds. Some have considered a medieval road running through the proposed development area, I think extensive archeology is required to understand and adding to the local knowledge of the site and area.

I have lived on Begdale my entire life and become accustomed to the beautiful Fenland view I can see from my property. This development will truly ruin the fen landscape and the views from my house.

After living here for a long while I have seen so much wildlife and especially the decline of it. The development bordering my property will ruin the local wildlife which inhabit it. I regularly see barn and tawny owls flying over the fields into my garden. i have also seen Roe deer, water voles in the ditches and bats forage over my garden and into the fields.

The loss of the wildlife would be awful to me personally and for the local area

LP53.01		
Title:	Mrs	Position:
First Name:	V	Organisation:
Surname:	Melvin	
Comment	Object	

LP1 (in adopted Fenland Local Plan) - (proposed local plan for Begdale Road, Elm)

In paragraph 3.3.2 "Open Space" and "Health Care & Facilities" are mentioned, how will this be possible if you intend to build on Open Space! It is already near impossible to obtain a doctor's appointment, there are not enough surgeries around at the moment, so larger population will cause even more problems and Mental Health Issues will see an increase.

Paragraph 3.3.5 "Road Injuries and Deaths" Begdale Road will not be suitable for any more traffic, it is already used as a "Rat Race/Run", the road surface is very uneven, to many blind spots, incorrect speed limit for type of road, when HGV & Farm vehicle's use the road, no other traffic can get by, so when the construction vehicles use the road, it will put more pressure and damage the roads.

Paragraph 3.3.8 "Local Growth" How will that happen if you intend to build on farmer's field, so there will be less if not any local produce. You may try and promote local produce / growth which everyone wants to purchase but you have to make it affordable.

LP3 (in adopted Fenland Local Plan) - (proposed local plan for Begdale Road, Elm)

Under "Limited Growth Villages" - I would like to stay the way we are as a village, no more growing. I moved out this way to be in the countryside and open spaces.

Paragraph 3.3.10 "Steers new development" - Building 215 homes is not really steering away to larger places. How can a slip road or a dirt track at the moment, where it will be same way in, same way out as "Best Access!!" It is farmers filed, you would have to have a car to travel or a fair walk to the bus stop, this will not be reducing the need to travel!

Paragraph 3.3.11 "Government Policy" - The countryside will no longer be recognised as "Intrinsic Character and Beauty" if you build in and on open spaces. There are at least 5 homes which look out onto open space, which in away could be classed as isolated where there will be no view only homes! We all moved this way for the open space and views.

Under 3.4 - "Housing Growth and Meeting Housing Need" - Not in any of the paragraphs (3.4.1 to 3.4.7) is it mentioned about building - More Schools, More Doctors / Dental Surgeries, Better Bus Transport, More Job Opportunities, better road conditions, all anyone is interested in is targets, figures and the years they have / want it to happen!

LP12 (in adopted Fenland Local Plan) - (proposed local plan for Begdale Road, Elm)

Under Part A: The proposed new dwellings will harm the wide, open character of the countryside as it will be just roof tops to be seen as far as the eye can see!

Farmland can be a natural boundary along with trees and hedges as they would be taken down in order to build. Wildlife would be forced out. Noise pollution from the Constuction vehicles. The composition of the road surface requiring constant repair. The country roads were never designed for construction traffic. With the new dwellers in mind, where are the street lamps going to be erected for the late night dog walkers, which will be required due to the heavier amount of traffic using said roads in the proposal.

LP14 (in adopted Fenland Local Plan) - (proposed local plan for Begdale Road, Elm)

Part A of LP14 states that all developments are encouraged to incorporate "Resource Use and Renewable Energy" does this mean that there could potentially be Wind Turbines on the proposed building plan?

LP53.01			
Title:		Position:	
First Name:	Susan	Organisation:	
Surname:	Stokes		
Comment Object I object to the plans of more houses that are planned to be built. Due to increase of traffic, on small narrow roads. We have just purchased the property, the road is already used like a rally track, more properties would destroy the village feel.			
Title:		Position:	
First Name:	Terry	Organisation:	
	•		

Comment Object

I am objecting to the above plans. For 250 houses to be built in begdale road and to wrap around the surroundings area. The begdale road will not cope with any more traffic as it is not built for this. Elm school will not cope with any more children. The water pressure is all ready bad down begdale and this will not help. We do not need more cars down a very untainted poor road. This will be over DEVELOPING to a very good VILLAGE. So will we be having new school built for all the extra children. Will all the road be upgraded to cope with the extra traffic. I do not think so. I objective completely to this development.

Title:		Position:
First Name:	David	Organisation:
Surname:	Wenn	
Comment	Object	
I am objecting to proposed development as begdale road can not cope already with the amount of traffic and a rap		

around development from the middle of elm to begdale road can not cope already with the amount of traffic and a rap around development from the middle of elm to begdale is so not needed. We home owners of begdale enjoy the what we have with out overdevelopment, before we even start on lack of and no school spaces, new doctors surgery!! No I can imagine no help for local amenities and before we start on water supplies and drainage which are already terrible . So all the extra traffic during building works will be compensated for damages to properties during this and will the road be fully upgraded to incorporate two way traffic and path's I Very much doubt this and don't want it . We already have to deal with unsutable traffic when A47 is shut begdale becomes a rat race it becomes unsafe to walk along so once again so many car's added to so many homes down our what was a quiet country lane we do not need.

LP53.01		
Title:		Position:
First Name:	Sam	Organisation:
Surname:	Bliss	
Comment This developmen	Object t has several problems.	

Firstly, it will heavily increase traffic on Begdale Road, a road that's barely more than a country lane and that's already relatively dangerous in terms of how narrow it is and the blind corners on it. I don't see any provision being made for widening the road to accommodate the extra traffic or to make it safer for the same, nor do I see how doing so would be possible.

Secondly, the increase in population will strain already strained infrastructure. I don't see any provisions being made for extra spaces at the local primary schools - or at the current rate of developments in Elm, Friday Bridge and Emneth, an entirely new school. Nor do I see any provision being made for extra GPs or an extra doctor's surgery.

Thirdly, the site will be built over the best agricultural land in the country, at a time when the UK only produces around 64% of its food needs (and that number is declining year on year); while the prices of gas, fertilizer, pesticides and consequently imported food are all rising dramatically as a result of the war in Ukraine. In a world as precarious as the one we're living in right now, where we face the very real possibility of war and food shortages, combined with a population increase of around a quarter of a million people a year from immigration alone, how does this make any sense? I understand that houses need to be built to accommodate a growing population, but there are doubtless plenty of brownfield sites that can be utilised and redeveloped to serve this purpose, both local to Wisbech and elsewhere. To busy ourselves building over our most productive soil at a time when we need that soil more than ever, is ill-considered to say the least. I can only assume that private profit is a major factor here, considering the relative cost of purchasing and redeveloping brownfield sites versus agricultural land.

Lastly I don't see any provisions that build towards the government's net zero ambitions. The government aims to increase the country's generation of renewable electricity: to that end, are these house being built fitted with solar panels? Probably not. The government plans to phase out all gas boilers by 2035, replacing them with heat pumps. In terms of the lifespan of a house 13 years is a blink of an eye. Will these houses be built with heat pumps installed, rather than gas boilers? I would like to think that reason prevails and that they will be, but I suspect that, considering the significant additional cost and the lack of any legal obligation to do so, gas boilers or some inferior alternative will be added instead. If that's the case then this development will be built with homes that are already obsolete and will require upgrading at significant cost to the homeowners just a few years down the line.

I object to this proposed development on the above grounds; I fail to see how anyone can consider it a sound and reasonable plan.

LP53.01		
Title:	Mrs	Position:
First Name:	Jennifer	Organisation:
Surname:	Barker	
Comment	Object	

I object to the above referenced site being built due to the amount of wildlife that live there.

BATS fly over our garden every night at dusk and all around the site. They roost in the trees on this site and the barn that is on the entrance to what would be the road leading to the development. This Barn would have to be pulled down.

ADDERS have been seen on the site.

GRASS SNAKES also.

HEDGEHOGS. we have a family of hedgehogs that roam around our gardens and this site. WATER VOLES. there are water voles all over this proposed site.

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

This large site lies adjacent to the Elm Conservation Area and close to a number of designated heritage assets including the grade I listed All Saints Church, grade II* Elm House and a number of grade II listed buildings and structures.

Any development 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:		Position:
First Name:	Will	Organisation:
Surname:	Sutton	
Sumanic.	Sutton	
Comment	Object	
connient - system		
215 dwellings in a relatively small Village like Elm are far too many for the current infrastructure to cope with,		
particularly Begdale Road, it just isn't capable of taking this quantum of dwellings.		

LP53.02			
Title:	Ms	Position:	Parish Clerk
First Name:	Suzanne	Organisation:	Elm Parish Council
Surname:	England		
Comment	Object		
Elm village cannot accommodate further large scale developments without significant improvements to			

Elm village cannot accommodate further large scale developments without significant improvements to infrastructure. This site is also unsuitable as the surrounding area has suffered incidents of severe surface water flooding in recent years.

LP54: Residential site allocations in Friday Bridge			
Title:		Position:	Associate Director
First Name:	Aaron	Organisation:	Strutt & Parker
Surname:	Coe		
CommentObjectat Well End Farm, Friday Bridge. SHEELA Ref: 40296.			

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

This representation is a summary of the full Site Representation Report which has also been submitted as part of this consultation response, along with an updated Site Plan.

Friday Bridge is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural areas as set out in the above representations in respect of draft Policy LP2. Accordingly, it is considered that further allocations should be included in Friday Bridge.

Three site allocations have been proposed in the village, however, 2 are already existing commitments and as such there is only one new allocation for the settlement. It is therefore considered that the Site should be included as it is modest in size and would deliver a proportional additional level of development to meet local housing needs.

In response to the concerns about flood risk a smaller area on the western side of the Site is now proposed as an allocation, as set out in figure 4 below and the accompanying Site Plan. This land extends 0.3 ha and could accommodate in the region of eight dwellings. Whilst concerns were raised in the SHELAA assessment with regard to 'backland' development as can be seen from the site plan in Figure 4 below the orientation of the two properties which adjoin the northern site boundary is such that they do not enjoy an outlook over the site to the rear. Furthermore, they already sit behind the existing frontage properties meaning that a back land character is already present in the area.

This particular site represents a sustainable location on the edge of the village, but within walking distance of the day to day services and facilities available. It is available for development and accordingly the County Council recommends it's inclusion within the new draft Local Plan.

It is therefore suggested that Policy LP54 should be amended to include the following:

For the reasons set out above in respect of draft Local Plan Policy LP2 it is considered that further site allocations need to be made to secure sufficient housing development to support the objectives of the new Local Plan strategy and for the Plan to considered 'sound' at examination.

Friday Bridge is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural. Accordingly, this additional proportionate allocation should be included for Friday Bridge.

4.3The Site is located with excellent access to existing services and facilities within the village. It could be delivered in the early years of the new local plan and is considered to be both deliverable and developable. Accordingly, it is considered that Policy LP54 should be amended to include this site as a new additional allocation.

LP54: Residential site allocations in Friday Bridge			
Title:		Position:	Graduate Planner
First Name:	Isabel	Organisation:	Strutt & Parker
Surname:	Ede		
Comment Land at rookery F	Object arm, East of Maltmas Drove, Friday Bridg	e. SHEELA Ref: 402	93

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

This representation is a summary of the full Site Representation Report which has also been submitted as part of this consultation response.

Friday Bridge is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural areas as set out in the above representations in respect of draft Policy LP2. Accordingly, it is considered that further allocations should be included in Friday Bridge.

Three site allocations have been proposed in the village, however 2 are already existing commitments and as such there is only one new allocation for the settlement. It is therefore considered that the Site should be included as it is modest in size and would deliver a proportional additional level of development to meet local housing needs. It is noted that its linear infill character is very similar to that of site LP54.03. Furthermore, Policy LP2 recognises that such linear growth on the edge of settlements is a historic pattern of growth, and for this reason has included Part C: Frontage Infill Development. It is considered that this proposed allocation has many similar characteristics.

While it is acknowledged that the central portion of the site falls within the flood zone this area could reasonably be included as extended garden land as part of any development proposals either side. The site could be developed in an organic way with a range of small and larger properties, and may well lend itself to delivering plots for custom and self build development.

This particular site represents a sustainable location on the edge of the village, but within walking distance of the day to day services and facilities available. It is available for development and accordingly the County Council recommends it's inclusion within the new draft Local Plan.

It is therefore suggested that Policy LP54 should be amended to include the following:

Conclusions:

For the reasons set out above in respect of draft Local Plan Policy LP2 it is considered that further site allocations need to be made to secure sufficient housing development to support the objectives of the new Local Plan strategy and for the Plan to considered 'sound' at examination.

Friday Bridge is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural. Accordingly, this additional proportionate allocation should be included for Friday Bridge.

The Site is in a infill location, supported by Policy LP1 with excellent access to existing services and facilities within the village. It could be delivered in the early years of the new local plan and is considered to be both deliverable and developable.

Accordingly, it is considered that Policy LP54 should be amended to include this site as a new additional allocation.

LP54: Residential site allocations in Friday Bridge

Title:		Position:	Graduate Planner
First Name:	Isabel	Organisation:	Strutt & Parker
Surname:	Ede		

Comment Object

Land at Rookery Farm, Maltmas Drove, Friday Bridge. SHEELA Ref: 40305.

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

This representation is a summary of the full Site Representation Report which has also been submitted as part of this consultation response.

Friday Bridge is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural areas as set out in the above representations in respect of draft Policy LP2. Accordingly the County Council supports the allocation of this site in Friday Bridge. The Site has been allocated as under Policy LP54.02:

An extract of the Policy 54.02 is set out below. It identifies that the site extends to 3.5 ha and could potentially deliver 87 dwellings. This is considered to be a reasonable assessment of the Site's potential capacity.

This particular site represents a highly sustainable location in the heart of the village, being within walking distance of the day to day services and facilities available. It is available for development and accordingly the County Council supports it's inclusion within the new draft Local Plan. Conclusions:

For the reasons set out above in respect of draft Local Plan Policy LP2 while it is considered that further site allocations need to be made to secure sufficient housing development to support the objectives of the new Local Plan strategy and for the Plan to considered 'sound' at examination, it is equally important that all those draft allocations are carried forward into the submission Local Plan unless they are conclusively demonstrated to be undeliverable.

Friday Bridge is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural. Accordingly, the County Council supports the allocation of this site in Friday Bridge.

The Site is centrally located with excellent access to existing services and facilities within the village. It could be delivered in the early years of the new local plan and is considered to be both deliverable and developable. Accordingly, the County Council support its inclusion as an allocation in Policy LP54 of the draft Local Plan.

LP54: Residential site allocations in Friday Bridge					
Title:	Mr	Position:			
First Name:	Р	Organisation:			
Surname:	Lattimore				
Comment	Object				
I note from the dwellings	document prepared b	y Fenland Council in relation to the proposals for Friday Bridge that a total of 230			
0	ver three sites. One of	are proposed over three sites. One of the sites is clearly also located close to a listed building and non designated			

hertiage assets. We submitted an application Ref: F/YR18/0158/O for four dwellings in a liner line extending the existing boundary however this was refused.

One of the sites is clearly also located close to a listed building and non designated hertiage assets.

Our site was a small area of land, not being farmed or used to the best of its ability which would have no detrimental impact

on a listed building or non designated heritage asset. Therefore, we ask the question, How can these large developments on grade 1 agricultural land currently being farmed be acceptable when smaller developments clearly not.

Title:	Mr	Position:
First Name:	Р	Organisation:
Surname:	Lattimore	
Comment	Support	
	locument prepared by Fenland Council in	relation to the proposals for Friday Bridge that a total of 230
dwellings		
are proposed ov hertiage assets.	er three sites. One of the sites is clearly al	so located close to a listed building and non designated
Ŭ	n application Ref: F/YR18/0158/O for fou	r dwellings in a liner line extending the existing boundary
however this wa		
One of the sites	is clearly also located close to a listed buil	ding and non designated hertiage assets.
Our site was a sr	nall area of land, not being farmed or use	d to the best of its ability which would have no detrimental
impact		
		efore, we ask the question, How can these large
•	n grade 1 agricultural land currently being	farmed be acceptable when smaller developments clearly
not.		

LP54.01			
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 St Marks Church 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:	Mr	Position:	
First Name:	John	Organisation:	Maxey Grounds
Surname:	Maxey		
Comment	Support		
The site is owned by clients who support the proposed allocation of this land East Of Flint Way.			

There are 2 access points to the allocation from West Drive and Flint Way, but we question the criteria to link to Church Road given there is no apparent route for this evident. The site has development on parts of 3 sides and thus relates well to the existing built environment. Bungalows to the north and two storey to the south will influence the form of development going forward in terms of dwelling type.

The site is entirely within Flood Zone 1 and as the evidence document notes few constraints.

The owners have confirmed that the land is available and it would be their intention to commence delivery in the early part of the plan period.

Title:	Ms	Position:	Parish Clerk
First Name:	Suzanne	Organisation:	Elm Parish Council
Surname:	England		

Comment Object

Development on this scale is too large for the village of Friday Bridge. Massive improvements in infrastructure would be required in order to support the increased population. In particular, improvements to highways, educational & medical facilities, public transport services.

Title:		Position:
First Name:	Dale	Organisation:
c		
Surname:	Hollis	
Comment	Object	
Roads won't be a	ble to take all these extra cars. The traffic	from all these new builds in Friday bridge and elm will be
chaos at elm hall		, 0

LP54.02			
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, the grade II Rookery Farmhouse lies to the west of the site. Development would cut the farmhouse off from its agricultural setting.

Any development of the site has the potential to impact the heritage asset 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.

LP54.02			
Title:		Position:	Graduate Planner
First Name:	Isabel	Organisation:	Strutt & Parker
Surname:	Ede		
Comment	Support		

Land at Rookery Farm, Maltmas Drove, Friday Bridge. SHEELA Ref: 40305. Strutt and Parker have prepared this representation for Strategic Assets on Behalf of Cambridgeshire County Council in its role of landowner.

This representation is a summary of the full Site Representation Report which has also been submitted as part of this consultation response.

Friday Bridge is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural areas as set out in the above representations in respect of draft Policy LP2. Accordingly the County Council supports the allocation of this site in Friday Bridge. The Site has been allocated as under Policy LP54.02:

An extract of the Policy 54.02 is set out below. It identifies that the site extends to 3.5 ha and could potentially deliver 87 dwellings. This is considered to be a reasonable assessment of the Site's potential capacity.

This particular site represents a highly sustainable location in the heart of the village, being within walking distance of the day to day services and facilities available. It is available for development and accordingly the County Council supports it's inclusion within the new draft Local Plan. Conclusions:

For the reasons set out above in respect of draft Local Plan Policy LP2 while it is considered that further site allocations need to be made to secure sufficient housing development to support the objectives of the new Local Plan strategy and for the Plan to considered 'sound' at examination, it is equally important that all those draft allocations are carried forward into the submission Local Plan unless they are conclusively demonstrated to be undeliverable.

Friday Bridge is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural. Accordingly, the County Council supports the allocation of this site in Friday Bridge.

The Site is centrally located with excellent access to existing services and facilities within the village. It could be delivered in the early years of the new local plan and is considered to be both deliverable and developable. Accordingly, the County Council support its inclusion as an allocation in Policy LP54 of the draft Local Plan.

Title:	Ms	Position:	Parish Clerk
First Name:	Suzanne	Organisation:	Elm Parish Council
Surname:	England		
Sumanie.	Eligialiu		
•	Object		
Comment	Object		

Development on this scale is too large for the village of Friday Bridge. Massive improvements in infrastructure would be required in order to support the increased population. In particular, improvements to highways, educational & medical facilities, public transport services.

LP54.02		
Title:		Position:
First Name:	Dale	Organisation:
Surname:	Hollis	
Comment Roads won't be al peak times.	Object ble to take all the extra cars. Elm hall rour	ndabout will be gridlocked for even longer then it is now at

LP54.03			
Title:	Mr	Position:	
First Name:	John	Organisation:	Maxey Grounds
Surname:	Maxey		

Comment Support

We act for Elm United Charities owner of the proposed allocation at Well End Friday Bridge. Our clients have consistently proposed the allocation of this land and so welcome the draft policy, support if and would intend to bring the site forward early in the plan period.

As the Evidence Report sets out there are few constraints for this site, which is entirely within Flood Zone 1 and centrally located in the village.

The site may be suitable for delivery as a frontage self-build scheme to enhance the supply of such plots in accordance with NPPF guidance.

The site owners would look to delivery the site early in the plan period. The site is also considered to comply with the criteria based approach of the current local plan.

LP55.01			
Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
	no designated heritage assets within the s ver, given the distance and intervening de		ed St Pauls Church lies to the south west pact on the heritage assets is likely to be
Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment Comment - ?Shou	Neutral uld this be LP54.03?		

LP56: Residential site allocations in Leverington			
Title:		Position:	Graduate Planner
First Name:	Isabel	Organisation:	Strutt & Parker
Surname:	Ede		
Comment	Object		

Land at Cranwell Farm, Gadds Lane, Leverington, Wisbech. SHEELA Ref: 40301 Strutt and Parker have prepared this representation for Strategic Assets on Behalf of Cambridgeshire County Council in its role of landowner.

This representation is a summary of the full Site Representation Report which has also been submitted as part of this consultation response, along with an updated Site Plan.

Leverington is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is located to the north west of Wisbech. Two larger sites are proposed for housing allocation in the north of Leverington under Policy LP56 for 100 dwelling and 96 dwellings respectively. Both sites are in the north of the village and it is therefore considered that as a medium village it could accommodate some further more modest allocations, particularly in the south.

As part of the site assessment process concerns were raised in respect of the scale of the original site submission and its relationship to the existing built form of the settlement. Accordingly, a reduced site allocation is now proposed solely in respect of the eastern parcel which is located on the eastern side of Gadd's Lane and sits behind the existing properties fronting onto Leverington Common. It is considered that this revised and smaller site would make a logical and proportionate addition to this part of the existing settlement. In this part of the village the Parish Council's Play Park forms a focal point both visually and socially. The proposed site allocation would relate positively to this. The character of the edge of the village is developed on the western side of Gadd's Lane on the approach to the village around the existing farm and development of the proposed allocation site would be experienced in this context. An existing drain and some established trees form a natural eastern boundary and further planting could be undertaken to reinforce this and create an appropriate boundary to the south.

In site assessment raised concerns about the Site's relationship to the existing services and facilities in the village. However, it is not accepted that the Site can be considered remote. The Site would be adjacent to the Parish Council's Play Park which must be considered to be located in a sustainable place within the village. Other key community facilities, including the Primary School and Sports & Social Club, would be just as close to this site as they are to the two other proposed allocations. Other facilities such as the Rising Sun Inn and highway connections to Wisbech would be much closer.

Concerns were also raised in respect of access. The site enjoys an extensive frontage onto Gadd's Lane from where pedestrian and vehicle access can be provided. While Gadd's Lane is a narrow country lane, typical of the rural parts of the district, it connects to Leverington Common, the B1169 within a short distance of approximately 75 m distance. It is not considered that the level of traffic that would be associated with a residential development of this site would result in any concerns in respect of highway safety. This particular site represents a highly sustainable location being in walking distance of the Primary School and central services and facilities within the village. Accordingly, it is recommended that the allocation strategy for Leverington is revisited to include this amended smaller site as additional new allocation.

It is therefore suggested that Policy LP56 should be amended to include the following:

Development should provide:

Vehicle and Pedestrian connections to Gadd's Lane;

A site layout which respects the amenities of the existing residential properties on the northern boundary; Archaeological investigation and mitigation, where required;

An assessment of Flood Risk, which reflects the recommendations of the SFRA Level 2 assessment; and Landscaping and screen planting along the eastern and southern boundaries of the site. Conclusions:

LP56: Residential site allocations in Leverington

For the reasons set out above in respect of draft Local Plan Policy LP2 it is considered that further site allocations need to be made to secure sufficient housing development to support the objectives of the new Local Plan strategy and for the Plan to considered 'sound' at examination.

Leverington is a Medium Village therefore one of the most sustainable locations for development. The site is located within the southern part of village adjacent to the Parish Council's Play Park which forms a focal point both visually and socially for Leverington Common. Other local village facilities are within walking distance to the north, and highway connections to the north west of Wisbech are also close by.

The reduced proposed allocation is therefore considered to be proportionate having regard to the scale of the existing settlement and in a sustainable location. The proposed educed site area will have a positive relationship with the existing context and character of this part of the settlement. Safe highway access can be provided to Gadd's Lane and in turn the B1169 a short distance from the site.

The Site could be delivered in the early years of the new local plan and is considered to be both deliverable and developable.

Accordingly, it is considered that Policy LP56 should be amended to include this site as a new additional allocation

Title:	Ms	Position:	Chartered Town Planner
First Name: Surname:	Shanna Jackson	Organisation:	Swann Edwards Architecture Limited
Comment	Neutral		
land submission 4	40227		

The site is physically adjoins the built up settlement of Wisbech and lies within flood zones 1 and 3. Planning permission was recently refused on site due to lack of information regarding the Sequential and Exception Tests. No objections were raised relating to the principle of development.

A revised planning application which demonstrates that the Sequential and Exception Tests are met is currently being considered by the Local Planning Authority.

There are no identified constraints which would restrict the use of this site for residential purposes and the land is immediately available for development. For the reasons given above the land should be allocated.

LP56: Residential site allocations in Leverington			
Title:	Mr	Position:	
First Name:	Steven	Organisation:	Foster Property Developments
Surname:	Foster		
Comment Policy LP56: Resic OBJECT	Object lential Site Allocations in Leverington		

Policy LP56 identifies the proposed residential allocations for Leverington. Foster Property Developments has an interest in land at rear of Glendon Gardens in Leverington (Ref. 40256), and requests that this site is also allocated in draft FLP for approximately 20 to 50 dwellings. The call for sites submission suggested a site capacity of 35 dwellings and included a buffer with the adjacent Roman Bank Scheduled Ancient Monument. The site is adjacent to Wisbech. As set out below the findings of the assessment for this site, as contained in the Site Evidence Report August 2022 [Doc Ref. PE01-4], should be amended including in respect of impacts flooding, on the character of the countryside, and on heritage assets. The decisions about which sites to allocate in draft FLP are based on the findings in the Site Evidence Report, and as such that evidence should be robust.

Foster Property Developments does not object to any of the proposed allocations or housing commitments in Leverington or adjacent to Wisbech.

Additional Allocation at land rear of Glendon Gardens in Leverington (Ref. 40256)

The land rear of Glendon Gardens in Leverington (Ref. 40256) was assessed in the Site Evidence Report August 2022 [Doc Ref. PE01-4]. The site was assessed as 'likely unsuitable' and was identified as a rejected site for the following reason: "The proposal is incompatible with national planning policies for managing flood risk, 72% of the site is located within Flood Zone 3. In addition, the site has a poor relationship to the built form and would have an adverse visual impact on the open countryside. Immediately adjacent to scheduled monument Roman Bank".

A Flood Risk Note (prepared by Geoff Beel Consultancy) comments on flood risk matters at the site and is submitted with these representations. In summary, this site is partly located within Flood Zone 3 but benefits from flood defences and is not at risk of flooding. It is noted that planning permission has been granted for other developments in Leverington and Wisbech that were also located within Flood Zone 3; those permissions considered flood risk and drainage impacts and concluded that they would be acceptable with conditions to address and manage impacts. It is noted that there is a housing commitment (in Wisbech) in close proximity of the site, at land to the east of Sutton Road, which has a similar proportion of land within Flood Zone 3 and has been granted planning permission subject to flood mitigation measures (see Allocation Ref. LP36.08). The decision to grant planning permission and allocate sites partly within Flood Zone 3 demonstrates that it is possible to successfully mitigate the impacts of flood risk in this location. It is recommended in the Flood Risk Note that finished floor levels for the promoted development should be raised to avoid flood risk impacts. It is requested that land rear of Glendon Gardens is reassessed in more detail in order to determine whether flood risk constraints could be addressed by mitigation measures, as has happened at those sites granted planning permission in Leverington and on the edge of Wisbech.

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

As set out in the in the call for sites submission, the promoted development includes a buffer with the Roman Bank Scheduled Ancient Monument on the western boundary of the site. The buffer would separate built development

LP56: Residential site allocations in Leverington

from this heritage asset and protect its setting. A Preliminary Heritage Report (prepared by Jonathan Biggadike) is submitted with these representations. The Report has been prepared to assess the impact of the promoted development on the significance of the heritage asset. It is concluded in the Report that the enclosed character of the Scheduled Ancient Monument would remain largely unaffected by the promoted development. The proposed buffer between development and the Scheduled Ancient Monument and a sensitively designed soft landscaping scheme could complement and enhance the setting of the heritage asset. The promoted development could enable improvements to the interpretation, public access, and biodiversity of the Scheduled Ancient Monument. The magnitude of the visual impact on the setting of the Scheduled Ancient Monument is assessed as 'Low Beneficial'. Therefore, it is considered that the comments in the site assessment about the impact on Roman Bank from the promoted development are not correct. The design and layout of the promoted development could mitigate the impact of development on this heritage asset.

In addition, as explained in the call for sites submission, the proposed access for the promoted development would be via No.32 Glendon Gardens following the demolition of the existing dwelling. Foster Property Developments owns that existing dwelling.

The representations to the assessment of this site against the sustainability objectives in the Sustainability Appraisal raise similar comments.

Requested Change

It requested that land rear of Glendon Road in Leverington (Ref. 40256) is allocated in draft FLP for residential development, with the following matters specified in the site-specific allocation:

• Number of Dwellings: Approximately 35 dwellings including affordable

•Site Area: 2 Ha

• Development should include:

oan assessment of flood risk

oa suitable vehicular access and footway and cycleway connections

owhere possible retain existing hedgerows

oprovide landscaping and planting at the northern boundary to reduce visual impacts

oa buffer on the western boundary with Roman Bank Scheduled Ancient Monument to separate built development from this historic asset and protect its setting.

LP56: Residential site allocations in Leverington			
Title:	Mrs	Position:	
First Name:	Beryl	Organisation:	Leverington Parish Council
Surname:	Воусе		
Comment Comments by the	Object Council on the draft Local Plan by Fenlar	nd District Council	

Leverington is classed as a medium village in the report but has always been a low village.

• Two sites have been identified for development , 96 dwellings at land east of Woodgate Road and 100 north of Parson Drove Lane. The 221 dwellings along Sutton Road that are part of Leverington are not taken into consideration as Leverington by the planners.

• There is no infrastructure to support all this building – no doctor's surgery, no school places available (some Leverington children have to go to Wisbech Peckover now).

• There is no width to the roads for a cycle/mobility route. The village roads are classed as 'lanes; in many cases and the surfaces will not take the extra weight of traffic. The Council is not in favour of over development in this rural village that will spoil the peaceful environment. The sites in question are prone to flooding in the winter months.

LP56.01			
Title:		Position:	
First Name:	Jonathan	Organisation:	Cruso & Wilkin
Surname:	Fryer		
Comment Land Shaded Blue	Support		

Support

We are writing independently of our earlier submission of support in respect of this site to confirm that the owners of the land referred to herein are in support of the allocation however would like to draw to the attention of the Fenland Local Plan Review Team the availability of the land as shaded blue on the attached plan extending in all to a further 2.48 hectares 6.09 acres. If the current allocation is adopted by the Local Authority it will leave a relatively small area of land bounded by residential properties which will remain difficult for modern farming practices to continue to be cultivated and therefore it is felt that incorporating the total field area this will provide a more comprehensive scheme and will have the opportunity to include additional open space, community benefits together with some biodiversity net gain.

We would therefore like to make a recommendation that the Fenland Local Plan Review Team extend the current allocation to include the land shaded blue within the overall designation and review. We would confirm that the site has the potential to be delivered within a relatively short timeframe subject to the preparation of the usual reports which can be completed prior to a further found of consultation (Regulation 19). We hope you will take these comments into account as part of your review process.

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

LP56.01			
Title:		Position:	
First Name:	Stafford	Organisation:	Hickman Farm Partnership
Surname:	Proctor		

Comment Support

We support the above referenced policy and allocation of the site as owners and occupiers of the freehold interest of the land identified.

We feel that the allocation of this land makes a natural extension to the built environment within Leverington Village.

It should be noted that there is provision by the adjoining residential estate for immediate access to be available to the land.

We would like to draw to the attention of the Fenland Local Plan Review Team the availability of the land as shaded blue on the attached plan extending in all to a further 2.48 hectares 6.09 acres. If the current allocation is adopted by the Local Authority it will leave a relatively small area of land bounded by residential properties which will remain difficult for modern farming practices to continue to be cultivated and therefore it is felt that incorporating the total field area this will provide a more comprehensive scheme and will have the opportunity to include additional open space, community benefits together with some biodiversity net gain.

Title:		Position:	
First Name:	Jonathan	Organisation:	Cruso & Wilkin
Surname:	Fryer		
Comment	Support		

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We feel that the allocation of this land makes a natural extension to the built environment within Leverington Village.

It should be noted that there is provision by the adjoining residential estate for immediate access to be available to the land.

The land has the benefit of the Mains Board Drain running along the northern boundary which, subject to formal confirmation from the relevant authorities, can deal with any surface water runoff generated through the development.

It is anticipated that should the land remain allocated prior to the further round of consultation (Regulation 19) that the landowners would then be in a position to commission a number of reports dealing with both heritage, landscape, ecology, flooding and drainage thereby providing further confirmation of the deliverability of the site having satisfied these planning benchmarks.

The owners of the land have already received an approach from a developer which supports our clients' belief that the site will be "deliverable" subject to formal planning supporting the Council's policy to achieve a five year land supply.

As a general comment in addition to the comments made above, we would also draw to the attention of the Fenland Local Plan Review Team that our clients own the additional land as shaded blue on the attached plan and have made an independent representation to secure this additional land should be included within the site allocation. A separate representation has been submitted dealing with this.

LP56.02				
Title:	Ms	Position:	Historic Environment Planning Adviser	
First Name:	Debbie	Organisation:	Historic England	
Surname:	Mack			
Comment No comments	Neutral			
Title:	Mr	Position:		
First Name:	Peter	Organisation:	Peter Humphrey Associates Ltd	
Surname:	Humphrey			
CommentObjectThis Draft allocation does not relate well to the existing built form.Only development that side of the road.				
There are better	site available and deliverable site that relation on is too large for existing Limited Growt		ttlement.	

LP57: Residential site allocations in Parson Drove			
Title:		Position:	Graduate Planner
First Name:	Isabel	Organisation:	Strutt & Parker
Surname:	Ede		
Comment Support			
Land at Swanbridge Farm, Fen Road, Parsons Drove. SHEELA Ref: 40302.			

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

This representation is a summary of the full Site Representation Report which has also been submitted as part of this consultation response.

Parson Drove is identified as a Small Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural areas as set out in the above representations in respect of draft Policy LP2. Accordingly the County Council supports the allocation of this site in Parson Drove. The Site has been allocated as under Policy LP57.02:

An extract of the Policy 57.02 is set out below. It identifies that the site extends to 0.44ha and could potentially deliver 8 dwellings. This is considered to be a reasonable assessment of the Site's potential capacity and would deliver an appropriate scale of development in proportion with the size of the settlement. It would also make a positive and efficient reuse of a brownfield site.

This particular site represents a sustainable location in the heart of the village, being within walking distance of the day to day services and facilities available. It is available for development and accordingly the County Council supports it's inclusion within the new draft Local Plan.

Conclusions:

For the reasons set out above in respect of draft Local Plan Policy LP2 while it is considered that further site allocations need to be made to secure sufficient housing development to support the objectives of the new Local Plan strategy and for the Plan to considered 'sound' at examination, it is equally important that all those draft allocations are carried forward into the submission Local Plan unless they are conclusively demonstrated to be undeliverable.

Parson Drove is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural areas as set out in the above representations in respect of draft Policy LP2. Accordingly, the County Council supports the allocation of this site in.

The Site is centrally located with excellent access to existing services and facilities within the village. It could be delivered in the early years of the new local plan and is considered to be both deliverable and developable. Accordingly, the County Council support its inclusion as an allocation in Policy LP57 of the draft Local Plan.

LP57: Residential site allocations in Parson Drove			
Title:	Councillor	Position:	
First Name:	Gavin	Organisation:	Parson Drove Parish Council
Surname:	Booth		

Comment Object

Very disappointed to note that FDC has not put forward the sites supported by the Parish Council and is promoting sites that the Parish Council has opposed. Given the fact that there is a Neighbourhood plan for Parson Drove and the policy on sites greater than 4 properties, particular attention should be paid to the views of the Parish Council, which has not happened. FDC have therefore considered this planning policy appropriately and the selection of sites is flawed.

The council noted its objection to the sites listed at P.152 at its meeting in March 2020.

Site 40224 - Brewery Close / Ingham Hall Gardens- not appropriate given the scale of the proposal and result in back land development. This would also have a major impact on the shape and form of Parson Drove. This would also close the gap between Parson Drove and Murrow.

This site has recently been refused planning permission since it does not comply with the Local Plan on the basis it is development in the open countryside and Neighbourhood Plan where it does not have support of the Parish Council or community.

Site 40260 - North of Fen Road - Site not appropriate given requirement to use Swan Bridge junction, which is an accident hotspot. Also, would result in back land development.

This site has been rejected in the past due to increased traffic levels in the vicinity of Swan Bridge, which is recognised as an accident hot spot.

Note sites supported by Parish Council at same meeting have not been taken forward: Site 40204, Site 40100, Site 40166. These sites are considered to be in keeping with the aims of the Parson Drove Neighbourhood Plan.

LP57.01			
Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		

Comment

Neutral

Whilst there are no designated heritage assets within the site, the Parson Drove Conservation Area and a number of grade II listed buildings to the north of the site. However, given the intervening development, the impact on the heritage assets is likely to be minimal.

Title:		Position:
First Name:	Peter & Marion	Organisation:
6		
Surname:	Crumpler	
Comment	Object	

The infrastructure is totally inadequate for a development of this scale: for additional dwellings/people/vehicles
 Drainage/waste is inoperable for the present properties in Ingham Hall Gardens. A tractor with a waste tank clears this daily

I The Carbon footprint would be increased

I Wildlife would be threatened and endangered – The area which is an excellent conservation area, A safe zone

I believe there has already been two application requests for 9 dwellings and both times it was declined/refused. I have no knowledge as to why 30 dwellings have been suggested, or in fact why have any dwellings been raised.
 Realistically, this would on average increase car usage by at least 2 or more cars per dwelling.

I The roads at present are in a very poor condition and any future vehicle trafficking to include heavy machinery would make the roads unroadworthy and unstable.

I The bus service is nonexistent in Parson Drove

I There is a lot of wildlife located within the area and on the fields. This is their home/safe zone.

We moved here from Southampton to get away from a stressful, manic City life and all the violence and drug issues that were occurring there. We decided moving to the countryside took us away from all of that. Moving to Parson Drove was a perfect and idyllic choice, we thought, the best decision ever. Our garden backs onto beautiful countryside with amazing wildlife, which we do not want destroyed. The neighborhood is friendly along with a supportive community, this only happens in small villages. None of our neighbour's want this annihilation to happen either.

We are both retired and Peter is an ex-service man who needs the piece and tranquility after serving in two Gulf wars and Northern Ireland. For this development to go ahead this will create added anxiety and stress related illnesses. He was forced to medically retire at the age of 57 and his condition has and will not improve, hence the ambience of living here helps us both with our Mental Health.

In addition, we are extremely concerned about the Wildlife conservation being severed which would be devastating to the environment. To name a few existing wildlife presently living in the fields behind us are: a variety of Deer families now with young, it's a flight path for resident bats, there are also resident Owls, Foxes, Badgers, Birds of Prey, Field Mice, Voles and other wildlife creatures such as Frogs, Toads, Slow worms and other earth creatures.

I understand the need to build homes, however it should not be to the detriment of the Wildlife and our Mental Health.

LP57.01		
Title:		Position:
First Name:	Linda	Organisation:
Surname:	Rouse	
Comment	Object	

I am strongly opposed to the proposed development of the above land.

My objections are that the planned location runs along the back of the bungalows in Ingham Hall Gardens and Brewery Close and, according to the plans would end very near our property. This would severely impact on local residents due to loss of privacy, noise, traffic, pollution and have a massive impact on the quality of life of local residents. As many households now have more than one car per household, the additional traffic would be significant. The access roads in Ingham Hall Gardens and Brewery Close would not be able to carry such a huge amount of additional traffic.

As Parson Drove has very limited public transport this would not decrease the use of private motor vehicles. As Parson Drove is quite a distance from Wisbech and March, walking to these would be very difficult, if not impossible for most people. (Sustainability Objectives 3).

The GP practice in Parson Drove is very difficult to obtain appointments at times, and the addition of 30 properties will have a detrimental impact on an already stretched service.

The proposed plans would mean that there would be an unacceptable amount of traffic noise, pollution, vibration from the vehicles. This could have an adverse effect on resident's mental health and impact on their quality of life. (Sustainability Objectives 8)

The first point on the proposal - Upgrades to Ingham Hall Gardens to an adoptable standard to achieve site access is also a huge concern. Since new developments in Brewery Close have started, the road which was damaged by building traffic was never repaired and we suffer flooding to the end of Brewery Close, towards Ingham Hall Gardens regularly. We have no faith that this new proposed site will be any different. Also, land owned outside our property is not being maintained, with overgrown grass verge and weeds on the gravel road. Likewise, we would not be confident that landscaping and screen planting along the development would take place.

This development would also impact significantly on Fenland landscape (Sustainability Objectives 4.3)

Plans for the development of 9 properties was rejected earlier this year and we are at a loss to understand why there is now a proposal for 30 properties.

LP57.01		
Title:		Position:
First Name:	Marilyn	Organisation:
Surname:	Mayes	
Comment I strongly object t	Object o the above site.	

1. Access to the above site via Ingham Hall Gardens. This road at the moment is badly maintained and use by extra traffic will only damage further, plus to access this site there is a small private road which will need maintaining.

2. The Doctors surgery cannot cope with the number of patients currently. So anymore will make it even more difficult to get an appointment.

3. The village does not have any transport links. Therefore more traffic using Main road which like other roads is very badly maintained.

4. The proposal exceeds the boundary lines of the village.

5. Can the local school accommodate any more children. I doubt it.

Title:	Mr	Position:
First Name:	J	Organisation:
Surname:	Fennelowe	

Comment Object

With regard to the proposal to erect 30 dwellings at the rear of Ingham Hall Gardens and Brewery Close I must formally lodge an objection. As a resident of 22 Ingham Hall Gardens my first objection is that in company with the owners of Nos 39 and 41 Ingham Hall Gardens I am responsible for contribution to the maintenance cost associated with the strip of road running from the corner of No 24 Ingham Hall Gardens to the existing sewage treatment plant. In the event that it is approved to use this strip of road as part of the access to the development of 30 dwellings then the wear on this strip of road would be totally unacceptable. Furthermore, according to Land Registry documents relating to this road, the current owners of the land on which the development is proposed only have right of access for the purposes of farming the land and maintenance NOT for developing the land.

I notice that paragraph 26.15 states that Parson Drove has a doctor's surgery. Sadly, we now have a surgery quite unable to cope with the current workload and a further 30 dwellings would add an intolerable burden. In addition, I am bound to point out that the land proposed for development is currently valuable agricultural land. At this time of food shortages, it would seem quite reprehensible to give up arable land for the building of dwellings.

In addition, I have to point out that a large number of smaller areas for development in the village were rejected with one of the reasons given being the lack of capacity at the local primary school., yet this proposal will potentially add more pupils that all of the others put together. I have to ask where is the logic in this.

Finally, I have to say that your draft proposal dated April 2022 shows a different site boundary to the latest layout. Why has this changed at such a late stage i.e. September 2022?

LP57.01		
Title:		Position:
First Name:	Donald	Organisation:
Surname:	Smithers	
Comment	Object	ar of Ingham Hall Gardens and Brewery Close I must

With regard to the proposal to erect 30 dwellings at the rear of Ingham Hall Gardens and Brewery Close I must formally lodge an objection. As a resident of 22 Ingham Hall Gardens my first objection is that in company with the owners of Nos 39 and 41 Ingham Hall Gardens I am responsible for contribution to the maintenance cost associated with the strip of road running from the corner of No 24 Ingham Hall Gardens to the existing sewage treatment plant. In the event that it is approved to use this strip of road as part of the access to the development of 30 dwellings then the wear on this strip of road would be totally unacceptable. Furthermore, according to Land Registry documents relating to this road, the current owners of the land on which the development is proposed only have right of access for the purposes of farming the land and maintenance NOT for developing the land.

I notice that paragraph 26.15 states that Parson Drove has a doctor's surgery. Sadly, we now have a surgery quite unable to cope with the current workload and a further 30 dwellings would add an intolerable burden. In addition, I am bound to point out that the land proposed for development is currently valuable agricultural land. At this time of food shortages, it would seem quite reprehensible to give up arable land for the building of dwellings.

In addition, I have to point out that a large number of smaller areas for development in the village were rejected with one of the reasons given being the lack of capacity at the local primary school., yet this proposal will potentially add more pupils that all of the others put together. I have to ask where is the logic in this.

Finally, I have to say that your draft proposal dated April 2022 shows a different site boundary to the latest layout. Why has this changed at such a late stage i.e. September 2022?

Title:		Position:		
First Name:	Michael	Organisation:		
Surname:	Johnson			
Comment	Object			
We are against the proposed development of 30 properties to the rear of our property. We like other residents in				
Brewery Close and Ingham Hall Gardens moved to this location for its outlook and semi-rural position. The roads				
themselves do not have the capacity for potentially another 60 or so vehicles. The entrance into Ingham Hall Gardens				

from Main Road is opposite the Church where funerals often take place, cars park along Main Road and often in Ingham Hall Gardens as well making it a dangerous junction.

We already have a development in front of our property which is not in keeping with the local surroundings further development to the rear is unacceptable.

Title			Position:
First	Name:	Paul	Organisation:
Curp	ame:	Skinner	
Sum	lame.	Skillier	
Com	mont	Object	
Com	ment	object	
I strongly object to the proposed plan, the reason being the infrastructure of the village will not be capable to cope			

I strongly object to the proposed plan, the reason being the infrastructure of the village will not be capable to cope with that amount of dwellings proposed.

LP57.01		
Title:	Mr	Position:
First Name:	А	Organisation:
Surname:	Rouse	
Comment	Object	

I am objecting to this proposal as this development would not conform to your Sustainability Objectives policy 3.1 on access to public transport. The development would result in additional traffic on the roads in Parson Drove as there is extremely limited public transport serving the village.

The development would result in a irreversible loss of under-developed agricultural land, your Sustainability Objectives policy 6.1. as this land should be used as agricultural land as we need to be producing more produce in the area.

A previous proposal for 9 properties in this location was rejected by the local Parish Council earlier this year.

Title:		Position:
First Name:	John	Organisation:
Surname:	Craythorne	
Comment	Object	
In my view there are a number of issues which make this site unsuitable.		

1. Access to the site - if via Brewery Close/Ingham Hall Gardens, Brewery Close is a private road for which some of the owners contribute towards its maintainance. If via Ingham Hall Gardens and the small access road to the rear of Nos. 24, 22 and 41 then the right of access/ ownership of this road is unclear. According to the Land Registry the owners of the land to the rear have right of access for agricultaral and maintenance use but not specifically to access future development.

2. Several of the parcels of land considered unsuitable in the draft plan put forward as a reason for rejection the lack of capacity at the local school, yet this development would potentially increase the pressure on the school by more than all the other sites put together. There is no logic in this.

3. It is not just the school that would feel the pressure, the local GP surgery is already under strain, the water pressure would be reduced due to lack of capacity.

4. Access to this site is via Ingham Hall Gardens/Brewery close. which is a small quiet development occupied almost exclusively by older, retired people. The increased traffic movements (minimum 60 per day but proably more like 100+ per day) poses the risk to the present occupants of potential accidents due to less mobility.

5. Despite the reduction in the size of the land offered for potential development this land is valuable agricultural land and a habitat for a wide variety of wild life including deer, foxes, owls and many species of birds and bats. Each "small" deminution of their habitat puts additional pressure on their survival.

LP57.02			
Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment	Neutral		

Whilst there are no designated heritage assets within the site, the Parson Drove Conservation Area and a number of grade II listed buildings to the east of the site. However, given the intervening development, the impact on the heritage assets is likely to be minimal.

LP57.02			
Title:		Position:	Graduate Planner
First Name:	Isabel	Organisation:	Strutt & Parker
Surname:	Ede		
Comment	Support		

Land at Swanbridge Farm, Fen Road, Parsons Drove. SHEELA Ref: 40302.

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

This representation is a summary of the full Site Representation Report which has also been submitted as part of this consultation response.

Parson Drove is identified as a Small Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural areas as set out in the above representations in respect of draft Policy LP2. Accordingly the County Council supports the allocation of this site in Parson Drove. The Site has been allocated as under Policy LP57.02:

An extract of the Policy 57.02 is set out below. It identifies that the site extends to 0.44ha and could potentially deliver 8 dwellings. This is considered to be a reasonable assessment of the Site's potential capacity and would deliver an appropriate scale of development in proportion with the size of the settlement. It would also make a positive and efficient reuse of a brownfield site.

This particular site represents a sustainable location in the heart of the village, being within walking distance of the day to day services and facilities available. It is available for development and accordingly the County Council supports it's inclusion within the new draft Local Plan.

Conclusions:

For the reasons set out above in respect of draft Local Plan Policy LP2 while it is considered that further site allocations need to be made to secure sufficient housing development to support the objectives of the new Local Plan strategy and for the Plan to considered 'sound' at examination, it is equally important that all those draft allocations are carried forward into the submission Local Plan unless they are conclusively demonstrated to be undeliverable.

Parson Drove is identified as a Medium Village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. It is acknowledged in the Local Plan that it is important for villages to be allowed to grow in a sustainable manner. As such appropriate allocations are not only required in the higher tier settlements but also in the rural areas as set out in the above representations in respect of draft Policy LP2. Accordingly, the County Council supports the allocation of this site in.

The Site is centrally located with excellent access to existing services and facilities within the village. It could be delivered in the early years of the new local plan and is considered to be both deliverable and developable. Accordingly, the County Council support its inclusion as an allocation in Policy LP57 of the draft Local Plan.

LP58: Residential site allocations in Wisbech St Mary					
Title:		Position:	Senior Conservation Officer		
First Name:	Daniel	Organisation:	RSPB		
Surname:	Pullan				
Comment	Neutral				
Policy LP58, p.1	53				
This includes a t	ypo that mistakenly labels	'land at sunset, station road' as all	ocation 59.02, not 58.02.		
Title:	Mr	Position:			
inte.					
First Name:	Alan	Organisation:			
Surname:	Quince				
Comment	Object				
I cannot underst	and why site ID 40169 (No	rth of Chapel Avenue, Wisbech St I	Mary is not included in the Draft Plan.		
And wish to make the following points:					
1. To the north and west of Site 40169 are Main Level Drains. So there is no Flood Risk					
		site ID F/YR17/1217/7 which has l			
•			ose on site immediately to the West		
	n the centre of the village				

5. Site 40169 is adjacent to the school6. The entrance to the playing field is at the North East corner of Site 40169

LP58.01			
Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment No comments	Neutral		
Title:	Mrs	Position:	Parish Clerk & RFO
First Name:	Sarah	Organisation:	Wisbech St Mary Parish Council
Surname:	Bligh		
Comment 40103 Trafford Fa	Object		

The Parish Council objects to the size of this development due to inadequate access points and will result in increased traffic levels in the vicinity.

LP58.02			
Title:	Ms	Position:	Historic Environment Planning Adviser
First Name:	Debbie	Organisation:	Historic England
Surname:	Mack		
Comment No comments	Neutral		
Title:	Mrs	Position:	Parish Clerk & RFO
First Name:	Sarah	Organisation:	Wisbech St Mary Parish Council
Surname:	Bligh		
The Parish Counc countryside. Deve	Object nset, Station Road LP58.02 il objects to this site as it extends the grov elopment on the 'Old Coal Yard' has histo id that of inadequate access onto Station	rically been recom	
Title:		Position:	
First Name:	Liam	Organisation:	Peter Humphrey Associates Ltd
Surname:	Lunn-Towler		
Comment LP58.02 site is sti Wisbech St Mary.	Support Il available and deliverable. The Draft allo	cation is located in	a sensible and deliverable part of

LP58.03			
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 site is opposite the grade II* listed Manor House. Part of the setting of the manor house is the open land on the opposite side of the road.

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

We have significant concerns about this allocation. Subject to the findings of the HIA this site may not be suitable for allocation.

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

Title:	Mr	Position:	
First Name:	John	Organisation:	
Surname:	Humphrey		
The housing deve	Support 5 houses Station road WSM LP58 elopment has been arranged in such a wa	y that it does NOT	effect the visual splay or spatial views of
the listed Manor	House.		
the listed Manor	House. Mrs	Position:	Parish Clerk & RFO
		Position: Organisation:	Parish Clerk & RFO Wisbech St Mary Parish Council
Title:	Mrs		

LP58.03			
Title:		Position:	Graduate Planner
First Name:	Ellie	Organisation:	Savills
Surname:	Cannon		

Comment Object

Station Road next to Grantchester House (LP58.03)

Our client is the owner of Manor House, a Grade II* Listed Building. The property is situated along Station Road, adjacent to the draft site allocation LP58.03 – Station Road next to Grantchester House.

The draft Local Plan proposes the allocation of the site for residential development, stating that: "development should provide:

- A foot/cycleway along the road frontage; including to connect the two parcels;
- Safeguarding of the setting and character of the nearby listed building;
- A 'frontage' development, with buildings oriented to face Station Road;

• An assessment of Flood Risk, which reflects the recommendations of the SFRA Level 2 assessment; and

• Landscaping and screen planting along the site boundaries to mitigate visual impacts."

In summary, and on behalf of our client, we object to the inclusion of site allocation LP58.03 within the emerging local plan on heritage impact grounds. We consider that any residential development of the proposed site allocation would result in substantial harm to the setting and significance of the Grade II* listed Manor House. The proposal is therefore neither in accordance with emerging and adopted heritage policies contained within Fenland's local development plan nor the National Planning Policy Framework (2021) (the NPPF). As such, this proposed allocation should now be omitted and not taken forward for inclusion in further draft iterations and nor therefore an adopted version of the currently emerging Local Plan.

We set out our comments in respect of the draft Local Plan and current evidence base documents below.

Planning Policy Context

The NPPF provides national planning policy for preparation of Development Plan policy and is an important material consideration in the determination of applications for planning permission through the development management process. Chapter 16 of the NPPF is concerned with the conservation and enhancement of the historic environment, which is a key consideration in the achievement of sustainable development.

In relation to the preparation of development plans, paragraph 190 states that (underlining of text added by Savills):

"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place."

The NPPF also provides the following guidance for considering the potential impacts of development on designated heritage assets. Paragraph 199 states (underlining of text added by Savills): "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Paragraph 200 states (underlining of text added by Savills):

"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."

The configuration of development as proposed under application ref. F/YR11/0432/F was refused on the grounds that the proposed development would lead to substantial harm and fail to conserve the Manor House heritage asset in its appropriate setting. Historic England also objected to the application stating:

"[...] by bringing a fundamental change to that part of the immediate setting of the manor that contributes most to its significance the development would cause substantial harm to it. The "clear and convincing" justification for this harm the NPPF requires has not been made. There is no reason why these houses could not be built elsewhere in the district and the idea that a mere four dwellings could deliver "public benefit" of an amount that would justify such harm to a nationally important historic building is completely unconvincing. I would therefore reiterate my strong objection to the application and urge the council to refuse permission." This view was supported by the conservation officer under application ref. F/YR11/0432/F.

The proposed site allocation, as shown on the draft policies map, retains a similar configuration to the site plan proposed under application F/YR11/0432/F, which is shown in Figure 2 below. It is our position that any development in this location would similarly amount to substantial harm, which is detailed further in the heritage assessment section below.

Heritage Impact

The Manor House property comprises a Grade II* listed property situated within Wisbech St. Mary, and therefore comprises one of the top 4% of Listed Buildings in the country. It is a fine example of a local vernacular interpretation of a polite country house, with Georgian formality combined with locally-fired bricks and Collyweston slate. Due to the virtual sole ownership of the house since its construction, it has been relatively untouched during its lifetime, a quality which English Heritage's Building Inspector greatly admired during the approval of restoration works to the property. The Strategic Housing & Economic Land Availability Assessment Stage 1 (SHELAA) (February 2020) identifies the Site under application ref. 40424. Although the SHELAA does not provide an assessment to determine each site's suitability for development or allocation, the individual site report for the land subject to site allocation LP58.03 details that buildings would not be visible to the left or right of The Manor House.

A Heritage Impact Assessment (as enclosed) was submitted on behalf of our client at the time of the 2011 planning application, and is included to support these representations. The assessment detailed the setting the different elements of the setting to The Manor House, which are demonstrated in Figure 3, below:

Figure 3: Excerpt from Savills Heritage Heritage Impact Assessment (July 2011)

Of particular interest is the formal spatial relationship which exists between The Manor House and the land subject to Site Allocation LP58.03. The Heritage Impact Assessment concludes that the orientation of the house westward results in oblique views towards the heritage asset which require protection in order to preserve the setting of the heritage asset. In this regard, the inclusion of development within site allocation LP58.03 would disrupt the formal vista towards the heritage asset and would therefore be detrimental to its setting.

The Heritage Assessment also confirms that development in this location would also be detrimental to the open character of the field itself, which is of historical intention and continues to be integral to the listed building's setting. It states that "this relationship is not confined to the formal vista across

LP58.03

the field, but relates as much to the open character of the field itself, providing a rural setting for a Georgian manor which is probably one of the finest examples of its type in the District". Given this assessment, the report concludes that development in this location would cause if not "total loss" then "substantial harm" to the setting of the heritage asset, a perspective which is also supported by the representations from Historic England to application ref. F/YR11/0432/F.

The Draft Local Plan – Sites Evidence Report (Part D) (August 2022) identifies that the land subject to site allocation LP58.03 has been allocated in accordance with the Council's growth strategy and is subject to the site-specific requirements detailed in policy LP58. These include incorporating the following requirements:

A foot/cycleway along the road frontage; including to connect the two parcels;

- Safeguarding of the setting and character of the nearby listed building;
- A 'frontage' development, with buildings oriented to face Station Road;
- An assessment of Flood Risk, which reflects the recommendations of the SFRA Level 2 assessment; and

• Landscaping and screen planting along the site boundaries to mitigate visual impacts." As previously stated, the Heritage Impact Assessment has detailed that development in the land to the west of Station road would have a detrimental impact on the surrounding open character of the rural area, which would amount to (at best) substantial harm to the setting of the heritage asset. Therefore, the mitigation presented in policy LP58 is insufficient to offer the necessary protection to the heritage asset, noting that great weight should be given to the asset's conservation (especially given it's Grade II* listing, in accordance with NPPF paragraph 199.

Furthermore, the delivery of housing within this site would not deliver significant public benefits that would outweigh the significant harm identified in the Heritage Impact Assessment, as required by NPPF paragraph 202, nor would it amount to "wholly exceptional" justification as required in NPPF paragraph 200. For example, the Draft Local Plan – Sites Evidence Report (Part D) (August 2022) identifies the Site as having a capacity to deliver only 9 dwellings, which would only provide a very minor contribution to the 10,525 dwelling target identified to be delivered between 1 April 2021 and 31 March 2040. Furthermore, it is given an individual SHELAA score of 'D', which means that it is identified as potentially unsuitable where the adverse impacts from conflict with minor criteria are unlikely to be resolvable through proportionate mitigation measures or policy requirements. On this basis, the Site should be considered unsuitable for development in heritage terms, especially given The Manor House's heritage significance.

Flood Risk

From a review of the Environment Agency's Flood Map for Planning against the draft local policies map, the Site appears to be situated within Flood Zone 1 and directly adjacent to, but outside of, Flood Zone 2. We would like to seek clarification from the Council that the boundaries of the proposed allocated site are situated outside of the Flood Zone 2 boundaries, particularly as residential development falls within the 'more vulnerable' classification of uses. In order to accord with paragraphs 159-162 of the NPPF, development should be directed away from the areas at highest risk of flooding.

Conclusion

In view of the above, we consider that the inclusion of site allocation LP58.03 – Station Road next to Grantchester House does not relate to a positive strategy for the conservation and enjoyment of the historic environment in accordance with paragraph 190 of the NPPF. In particular, we do not consider that the plan has taken into account the desirability of sustaining and enhancing the significance of

the important the Manor House, nor consideration of the wider social, cultural and environmental benefits the conservation could bring.

In line with previously refused planning applications at the land subject to site allocation LP58.03 and the aforementioned Heritage Impact Assessment, we consider that the proposal would result in significant harm to the setting of the Grade II* listed Manor House and that there is no substantial public benefit to residential development in this location, especially given the proximity to Flood Zone.

Consequently, we object to the inclusion of the site allocation and respectfully urge the Council to remove the allocation from the emerging Local Plan.

We would be grateful for confirmation that this letter of representation has been received, and that it will be taken into account. We will look forward to continuing to engage with the remaining stages in the preparation of the emerging Fenland Local Plan.

LP58.04			
Title:	Mrs	Position:	Parish Clerk & RFO
First Name:	Sarah	Organisation:	Wisbech St Mary Parish Council
Surname:	Bligh		
CommentNeutral40045 Land North of Orchard House LP58.04The Parish Council raised no objections as this site is already being developed			

LP58.05			
Title:	Mrs	Position:	Parish Clerk & RFO
First Name:	Sarah	Organisation:	Wisbech St Mary Parish Council
Surname:	Bligh		
	Neutral n of The Barn, High Road LP58.05 il raised no objections as this already has	planning permissio	ın.

LP58.06			
Title:	Mrs	Position:	Parish Clerk & RFO
First Name:	Sarah	Organisation:	Wisbech St Mary Parish Council
Surname:	Bligh		
	Neutral of the Sunset Rooms LP58.06 il raised no objections as this site is alread	dy being developed	L.