

Part D – Policies for Sites and Settlements

Title: Mrs **Position:**

First Name: Susan **Organisation:**

Surname: James

Comment **Object**

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

Title: Mr **Position:**

First Name: Lee **Organisation:** L Bevens Associates Architects Ltd

Surname: Bevens

Comment **Object**

SHELAA 40374

I would like this site to be re-considered as part of consultation process. It was never intended that a new site access would be taken from King Street and that the current access would be retained for pedestrian access only. We fully appreciate that its width and proximity to the junction with the A141 makes it unsuitable for vehicles to use. If incorporated into the Local Plan a suitable access would be agreed with the adjacent developer - Reason Homes (discussions have been on-going) including the land referenced as SHELAA 40152.

The other reasons given for rejection are not strictly accurate. The site would relate to the built form of Wimblington. I refer to existing development at Meadow Way and Meadow Way South. Appropriate modern day acoustic fencing and bunding could be provided along the boundary with the A141 to reduce the impact to amenity. The site could be brought forward in a comprehensive manner with site 40152 to provide much needed housing in the area, together with biodiversity gains, suitable surface water mitigation/solution for the development. I would ask that this site is reconsidered for development.

Title: **Position:**

First Name: Stephen **Organisation:**

Surname: Hodson

Comment **Object**

There is a free for all with site being allocated all over the district .Many of the location are not sustainable due to a lack of facilities .However , allocated sites 40501 Church Street, Whittlesey .This land is right in town and is ideal for social housing .It is owned by Fenland District Council. I do object to appl; 40157 Snoots Rd ,Whittlesey .It is hard up tp a site of contaminated land fill currently under investigation by the Environment Agency. I am pleased that Fenland are reintroducing settlement boundaries .

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Title:		Position:	Associate
First Name:	Gabrielle	Organisation:	Pegasus Group
Surname:	Rowan		

Comment	Object
<p>These representations are submitted by Pegasus Group on behalf of George Scarborough Ltd who has land interests in March.</p> <p>The site comprises the Go Kart track at Creek Road, March. A site location plan is attached to these representations. It is considered that this would provide an ideal opportunity for a new tourism facility comprising a glamping site with accommodation pods, fishing pitches and venues to host health and well-being events.</p> <p>It is considered that this type of use in this location would be in compliance with the emerging Vision of the Local Plan and the proposed tourist development policies. Part of the Vision for the emerging Local Plan is to seek opportunities to bolster the rural economy and rural communities. Emerging Policy LP17 & LP18 support the tourism and visitor industry by welcoming new accommodation and attractions. It is important that the Council identifies sites which can deliver this vision and opportunities.</p> <p>The National Planning Policy Framework (NPPF 2021) supports a prosperous rural economy. In paragraph 84 states that Local Plan policies should enable sustainable rural tourism and leisure developments which respect the countryside. The identification of this site in the emerging Local Plan as a rural tourist use would be in compliance with relevant national and local planning policies.</p> <p>The site has an existing vehicular access which could be adequately utilised for this purpose. The site is of an adequate scale in order to accommodate a modest tourist facility with a range of accommodation units in a pleasant, landscaped environment.</p> <p>It is considered that within the emerging Local Plan Policy LP39: Site Allocations for March, this site should be identified for tourism uses.</p>	

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Title:

Position:

First Name: Richard

Organisation: Benwick Parish Council

Surname: Robinson

Comment **Neutral**

Benwick is not listed amongst the other settlements on page 10 and we would like to make clear that we are here; although we are listed on page 23, because we have no allocations there is no reference to us in the document. We believe that we should be listed and that it should say nil allocations for reference purposes so that people can search the document and find out the situation in Benwick.

The balance of the opinion of the Council was that due to improvements in the flood defences especially the pumping therefore Benwick should be in a better flood zone than three ie 2 or 1. Improvements were made especially for the Taylor Wimpey development at Heron Way. The minority opinion was that the flood zone should not be changed in order to defend the village from the risk of flooding.

The majority of the council would like to see some development on the brownfield sites that we have already put forward. Also the sites that have planning permission already should be developed.

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

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

Part D – Policies for Sites and Settlements

Title:	Mr	Position:	
First Name:	Lee	Organisation:	L Bevens Associates Architects Ltd
Surname:	Bevens		
Comment	Object		
SHELAA 40375			

The site has been the subject to a previous planning application under F/YR19/0068/O which was refused. A supporting FRA was submitted which stated that whilst the site was within flood zone 3, no evidence was discovered of the site being flooded or of any adjoining properties within the last 100 years. The probability of this development flooding from localised drainage systems is very low. It is also intended to construct floor levels of the development at 300mm above existing land level with a further 300mm of flood resilient construction above finished floor level. The probability of the site flooding with water from any main river system is less than 1% because of the standards of the existing flood defence systems, storage within existing drainage channels and the location of the site. If under very extreme events, levels of floodwater from main river or arterial

systems rose to such an extent it is highly unlikely that the site would be flooded due to existing land levels. The water levels in the drainage channels will tend to rise as a result of the impacts of climate change. However, the existing systems and defences together with the raising of floor levels above existing land levels will be appropriate for the design life of the development (i.e. 100 years). No adverse effect will be suffered at this site. The site is within Flood Zone 3 according to NPPF classification with a very low risk of flooding due to the current standards of drainage and flood defences. The site is not located within a Functional Flood Plain of any 'main river' or 'main drain'. The Environment Agency Flood Map for Planning has been produced irrespective of existing flood defences and standards of protection.

In the extreme event of a serious blockage or pumping station failure occurring to the arterial drainage system, protection will be afforded by the proposed raising of floor levels above existing ground and road levels. Although the site is located within an Internal Drainage District with a minimum standard of drainage of 1 in 50 years, this accords with Defra guidelines for rural development. Freeboard to design water level of 900mm to lowest land level is available for events greater than 1 in 50 years providing further storage within the drainage channels.

The site lies adjacent a residential scheme of 47 dwellings built by Taylor Wimpey and approved in 2005, similarly in flood zone 3. The site is a natural extension of the development form of Benwick. Benwick needs to be allocated housing to support local shops and businesses. It has a relatively new shop in the centre of the village that needs new housing to continue to support it.

Anglian Water have recently approved a new reservoir north of Chatteris and this will bring a much-needed economic boost for The Fens, with new jobs and tourism amongst many positives. New housing will be required to support this and offer a choice across the district.

This site proposal would seek a maximum of 15 dwellings with mitigation provided for surface water drainage and would therefore not constitute over development of the site, together with offering a mixture of housing to support the identified local need.

The previous assessment of the site identified that the site was relatively free from constraints, and we believe that whilst acknowledging that the site falls within Flood Zone 3, there are sufficient protection measures in place to protect future development of the site.

We would ask that that this site is re-considered to support housing growth in the district.

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

Comment **Neutral**

Brown & Co have been instructed to submit the following representation regarding the Fenland Local Plan 2021-2040 Draft Local Plan Consultation August 2022 on behalf of our client Mr and Mrs J Mair (landowner) in respect of Land at Manor Farm, Doddington, PE15 0TN (Grid reference: TL 40957 90497).

The Land at Manor Farm, Doddington comprises approx. 148 hectares and we enclose a site location plan showing the location of the site shaded in red. It is considered the site should be allocated for development by Fenland District Council in the Fenland Local Plan 2021-2040 as a standalone garden village settlement. The site is ideally located adjacent to the A141 (strategic road network) and can provide for approx. 3000 houses on 100 hectares of the land (density of 30 dwellings per hectare) with the remaining land enabling strategic landscaping, public open space, community facilities, education provision and employment.

Paragraph 7 of the National Planning Policy Framework 2021 (NPPF) sets out the purpose of the planning system is to contribute to the achievement of sustainable development. Within paragraph 8 of the NPPF 2021 this sets out achieving sustainable development has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways and encompasses an economic, social, and environmental objective.

The allocation of the site as a garden village will enable economic benefits not only from the employment provision directly on site but through the very creation of the development in terms of construction jobs for the duration of the build and to the wider economy of Fenland thereafter. The development will provide social benefits, it will support a strong, vibrant, and healthy community with a range of homes to meet the needs of future generations with well-designed buildings and public open space. The development will have the environment at its heart by protecting the natural environment with strategic landscaping on the edge and landscaping within the site as well as improving biodiversity and mitigating and adapting to climate change. Therefore, it is considered the site achieves sustainable development as set out in paragraph 8 of the NPPF 2021.

As set out in paragraph 73 of the NPPF 2021 the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as a new settlement. The proposed standalone garden village settlement can help to meet identified needs in a sustainable way utilising garden city principles which sets a clear expectation for the quality of the place to be created and how this can be maintained.

The Vision in the Fenland Local Plan 2021-2040 DLP sets out in Paragraph 3.1 “The district will attract new business, jobs and investment, whilst also supporting existing businesses and encouraging them to expand, helping to boost productivity. Rural communities and the rural economy will be supported. Growth in homes and jobs will be closely linked, with new infrastructure such as schools, roads, health facilities and open space provision planned and provided at the same time as the new buildings” which is supported and aligns with the NPPF 2021. The allocation of this site as a new garden village settlement will enable the vision for Fenland with the ability to have homes and jobs as well as public open space, community facilities, education and employment provision aligned together in a unique location.

Policy LP1: Settlement Hierarchy sets out the decisions on investment in services and facilities and, the location and scale of new development on the basis of the settlement hierarchy with the Market Towns designated as Chatteris, March, Whittlesey and Wisbech. Policy LP2: Spatial Strategy for the Location of Residential Development sets out the Local Plan focuses the majority of new residential development in and around Fenland’s four market towns of Wisbech, March, Whittlesey and Chatteris. This site presents the unique opportunity to provide a new garden village settlement in its own right which will provide homes as well as services and facilities to meet its own needs in addition to the Market Towns of Chatteris, March, Whittlesey and Wisbech. The allocation of the site will assist in boosting the supply of housing, thus complying with the NPPF 2021 and significantly contribute to Fenland’s housing requirement.

Policy LP3: Spatial Strategy for Employment Development sets out the employment growth strategy will be principally focused on the market towns of Wisbech, March, Chatteris and Whittlesey and employment development is identified

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through site allocations. We highlight the proposed garden village can facilitate further employment development to support itself, in addition to the employment allocations proposed by the Council. The site has a lack of constraints which makes it a suitable site for a standalone garden village settlement, and we highlight the availability of the land will assist the Council in pursuing a comprehensive spatial planning approach which accords with the NPPF 2021.

We would be grateful if you could keep us updated on the progress of the emerging Fenland Local Plan.

Title:	Mrs	Position:
First Name:	Suzanne	Organisation:
Surname:	Hodder	
Comment	Object	
Paragraph 23.25 references the document ‘A Local Plan Five-Year Land Supply Report’ I question the accuracy of this report and in particular the entry for Tydd St Giles golf and leisure centre, which states permission for 51 holiday homes, under construction 21, net commitment 21, yr1 2021/2022 21. This is completely inaccurate. The number was change to 50 not 51 retrospectively and as far as we are aware all 50 have been built. Therefore, yr 1 2021/2022 should have a figure of 50 not 21. This is probably not an isolated error and therefore it calls in to question the totals being relied upon within this document.		

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

Comment	Object
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When responding to similar documents it has been noted that having prepared detailed responses to specific site allocations, which has taken a significant amount of officer time and expense, the responses made are ignored.

Therefore, as a result, with a couple of exceptions below, detailed responses on individual sites have not been prepared but it is hoped that in determining the suitability of a site the following general matters have been considered as a minimum:

1. The proximity to the extents of the floodplain shown on the Environment Agency's Flood Map for Planning, Surface Water and Groundwater flood mapping.
2. The site is not within a "wet spot" or known area of poor drainage or flooding.
3. The site is adequately protected by flood defences for its lifetime.
4. There is adequate space to raise suitable flood defences during its lifetime.
5. Allowance has been made for access, maintenance, including spoil disposal, and future improvement of protected watercourses and associated maintenance access strips.
6. Retention of, or provision of, access strips for maintenance, including spoil disposal, and improvement of open watercourses, SUDS and other parts of the water level and flood risk management systems.
7. The presence and location of suitable public sewers which have the capacity to receive increased flows.
8. Whether other suitable points of discharge are available.
9. Whether the downstream system is adequate to serve the development for its lifetime or whether channel improvements are required before work commences on site.
10. Provision has been made for a suitable means of surface water disposal i.e., infiltration devices, storage crates, enlarged pipes, balancing/attenuation ponds or other devices.
11. Provision of water recycling/harvesting facilities.
12. Retention, provision and/or enhancement of suitable environmental habitats and to make further provision for biodiversity net gains to achieve environmental benefits to the waterways in the district.

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Title:		Position:	
First Name:	Lynda	Organisation:	
Surname:	Warth		
Comment	Object		
Part D - refers to all sites			

Every one of these sites and the comments must be reviewed for blatant errors concerning access. Should not be creating off road links to byways which do not include safe access for equestrians. Creation of cycle paths alongside roads does not comply with the new Highway Code. Equestrians are equally vulnerable road users as cyclists.

This principle needs to be adopted as policy and included in the preamble of the plan so that it feeds down through every development site which comes forward. It is not possible for a consultee to refer to every single site contained within the plan.

Use of the clearly defined term Active Travel will be the easiest way to ensure consistency by planners and applicants. It will also meet the requirements of the Cambs ROWIP and the Cambridgeshire and Peterborough Local Transport Plan.

Title:		Position:	Senior Planner
First Name:	Victoria	Organisation:	Gladman
Surname:	Demetriou-Smith		
Comment	Support		
Distribution of Growth			
In broad terms, it is considered that the identified allocations and distribution of sites provides for a good range of sites which are distributed across the District. This approach avoids overconcentration of development meaning that pressure on existing services and infrastructure is likely to be limited and provides for added market choice, enhancing delivery rates. It will also ensure that housing needs and pressures in the market are met, enhancing the effectiveness of the Local Plan in addressing key issues for the District.			
As previously stated, when additional housing sites are considered to meet the housing requirement as it should be, Whittlesey, Doddington and Wimblington are highly suitable and sustainable locations for growth and should be considered capable of accommodating residential development.			

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Title:		Position:	Sustainable Places Planning Adviser - East of England
First Name:	Andrew	Organisation:	Environment Agency
Surname:	Thornton		
Comment	Neutral		
Sites Evidence Report			

This report indicates that only flood zones have been used to assess the suitability of these sites for development (although surface water flood risk is mentioned in the Site Assessment Methodology report). Other sources of flood risk and the effects of climate change should be considered in the application of the sequential approach.

It is unclear if residual risks have been considered in the application of the sequential approach. As a large part of Fenland is reliant on flood risk management infrastructure, information on residual risk (e.g. hazard / breach mapping) should be used to inform a sequential approach to the location of development within Flood Zone 3. This information should be included in the Level 2 SFRA and be used to inform the Local Plan.

Sequential and Exception Tests

Evidence needs to be provided to demonstrate that the Sequential Test and, if necessary, the Exception Test has been applied to site allocations located either entirely or partly within Flood Zones 2 and 3.

Title:		Position:	Sustainable Places Planning Adviser - Eas
First Name:	Andrew	Organisation:	Environment Agency
Surname:	Thornton		
Comment	Neutral		
Many of the policies in this part of the Local Plan refer to the requirement for a Flood Risk Assessment (FRA) based on the recommendations of the Level 2 SFRA. However, the Level 2 SFRA is not available. The Level 2 SFRA needs to inform the application of the second part of the Exception Test for any housing site allocations located partly in Flood Zone 3. Without the level 2 SFRA the Local Plan will likely be found unsound.			
None of the policies for site allocations include any requirement to reduce flood risk overall as part of the development where possible. This requirement is clearly set out in paragraph 62 of the PPG on flood risk and coastal change. Any opportunities to provide flood risk betterment should be identified in the Level 2 SFRA and clearly set out in the relevant site allocation policy.			

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

Where there is an existing water mains/foul sewer(s)/ rising main (pressurised sewer)/surface water sewer(s) in Anglian Water’s ownership within the boundary of a proposed site, the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains/sewer(s) should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy. Where we have existing assets within the proposed site allocations, we request that the following wording is added to the policy (amended as appropriate):

- the safeguarding of suitable access for the maintenance of [water supply/foul/surface water drainage] infrastructure.

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

Policies for sites and settlements

Our response to the Issues and Options consultation included detailed comments on the need for the site assessment methodology to be based upon a robust evidence base, to ensure that development is sustainable.

We are unable to provide detailed comments on specific site allocation policies; however, we feel that the policy requirements are not prescriptive enough to ensure development will deliver significant environmental enhancements that will benefit local communities, people and wildlife. Our further comments and advice on this issue are detailed above.

As indicated above, Natural England is concerned that a number of allocations are on the remnant peat soils, particularly in March, Chatteris, Whittlesey and Wimblington. In some cases, extensive swathes of peat could potentially be disturbed, releasing significant carbon emissions into the atmosphere, and effectively sterilising the peat and destroying part of this important carbon store. We accept that avoiding the peat is a challenge across much of Fenland; however, ecological opportunity mapping, to underpin the Local Plan, would help to protect the peat resource by prioritising it for GI and nature recovery opportunities, so that allocations are targeted towards more sustainable locations.

Given the importance of the peat soils in mitigating climate change and the opportunities they provide for GI enhancement, nature recovery and natural flood management solutions, we believe allocations should avoid the peat soils as far as possible. This doesn’t appear to have been addressed through the Sites Evidence Report and SA. Policy allocations on peat soils should, as a minimum, require development to be directed towards the most degraded areas to retain and enhance better quality peat soils within the on-site green infrastructure.

Part D – Policies for Sites and Settlements

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

Comment **Neutral**

Does the number of houses referred to in the housing trajectory tables represent a maximum or minimum number?

23: Sites - Introduction

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

Comment	Object
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A - General comments on site assessment
HELAA and Heritage Impact Assessments

We are pleased to note that a degree of site assessment has already been undertaken in relation to the historic environment. These are set out in the SHELAA Reports and site evidence report.

To date, the assessment of sites is fairly high level and brief.

As we have discussed previously, further assessment in terms of significance, impact on that significance, potential mitigation and enhancements etc will be needed of the sites.

We are concerned that there is currently insufficient evidence in relation to the historic environment in terms of site allocations. To that end, we suggest that you review the site assessments to ensure that there is sufficient and robust in its consideration of the historic environment.

We refer you to our advice on the Historic Environment and Local Plans and Sites Allocations which is set out in the following documents:

HE Good Practice Advice in Planning 1 – the historic environment in local plans: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

HE Advice Note 3 – site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets (a Heritage Impact Assessment or HIA). It advocates 5 steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This should be applied to the assessment and selecting of sites within a plan.

In essence, it is important that you:

- Identify any heritage assets that may be affected by the potential site allocation.
- Understand what contribution the site makes to the significance of the asset
- Identify what impact the allocation might have on that significance
- Consider maximising enhancements and avoiding harm
- Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness

In assessing sites, it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors. This should be more than a distance-based criteria but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate.

We strongly advise that a Heritage Impact Assessment (HIA) is undertaken the sites identified in the table below. It is important that the evidence base is proportionate and so the level of detail will vary depending on the site – its size and the number and significance of heritage assets affected. We have identified a number of sites in this table and the covering letter where assessment would be required.

The findings of the assessments should then be incorporated into the relevant site allocations policies (e.g. site capacity, potential mitigation and enhancements etc.

We have indicated in the table below which sites will require a heritage impact assessment (HIA).

23: Sites - Introduction

Suggested Change - Prepare Heritage Impact Assessments for those site allocations identified below.

B - General comments on policy wording for site allocations

It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.

Where a site has the potential to affect a heritage asset, we would expect to see the following typical wording within the policy:

'Development should conserve or where appropriate enhance the significance of heritage assets including [list heritage assets on site and nearby] including any contribution made to their significance by their settings. Appropriate mitigation [and enhancement] measures identified in the Heritage Impact Assessment including... will be required.'

The policy wording should mention the specific designated heritage assets both on site and nearby.

The policy and supporting text should also refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or heritage buffer/set back/breathing space etc.

It can also be helpful to refer to an HIA in the policy wording where one has been prepared. Concept diagrams can also be useful to include in the plan to illustrate key site considerations/ recommendations.

In drafting policy wording for site allocations please ensure that policy wording/supporting text is consistent with the advice above.

By following this advice in relation to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.

Given the inclusion of reference to significance and setting we suggest that these terms (which are quite technical) are included in a glossary.

Suggested Changes:

Mention specific heritage assets in policy wording.

Use HIAs to inform policy wording. Include historic environment criteria in policy wording.

C - General comment on extant planning permissions included as allocations in Plan

We do not have the capacity to review all of the extant planning permission sites as well.

Clearly the principle of development has already been established on these sites.

However, we suggest that if you are including these sites as allocations in your Plan, they should also have policies with criteria.

The reason for this is that not every planning permission will be implemented. If a different application comes forward for a site it is important to be clear what issues affect a site and what the criteria should be in decision making. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.

Criteria could be based on the broad parameters agreed in the extant planning permission. It is important that these criteria are set out in the Plan.

In some cases, it may be helpful to produce an HIA to inform the appropriate mitigation and policy wording for the Plan policy.

23: Sites - Introduction

Title:	Mr	Position:	
First Name:	John	Organisation:	Maxey Grounds
Surname:	Maxey		
Comment	Object		
Para 23.23-23.26 and Table 10			
The housing requirement is stated to be 556 after the first year of the plan. The trajectory shows that for 31/32 onwards the anticipated delivery is significantly below the trajectory. The plan should provide for the anticipated requirement throughout the plan period.			

Title:		Position:	
First Name:	Kathryn	Organisation:	
Surname:	Hearn		
Comment	Object		
Para 23.22 (and Table 9)			
Housing growth for Chatteris seems proportionally higher than other Fenland Towns. I am concerned that the council is building on a site like Wenny Meadow which are special ancient natural environments which aren't needed for the appropriate town growth. Especially when a town vote was undertaken to reconsider this position and was wholeheartedly voted against building on this special site.			

23: Sites - Introduction

Title:	Mr	Position:	
First Name:	Steven	Organisation:	Foster Property Developments
Surname:	Foster		
Comment	Object		
Table 10: Housing Trajectory			
OBJECT			

Paragraph 74 of the NPPF requires a housing trajectory to be provided for development plans, setting out the expected rate of housing delivery during the plan period and if appropriate the delivery rates for specific sites. The purpose of the housing trajectory is to demonstrate that draft FLP provides for an adequate housing land supply to meet the preferred housing requirement during the plan period. It is expected that the predicted delivery rates contained in the housing trajectory would be realistic and informed by evidence.

It is predicted in Table 10 that 10,828 dwellings would be delivered during the plan period from sites with planning permission, preferred allocations and unidentified windfall sites. The difference between the housing supply (10,828 dwellings) and the housing requirement (10,525 dwellings) is only 303 dwellings, which represents very limited flexibility in the housing supply. In these circumstances the predicated housing delivery rates will need to be robust so that a sufficient housing land supply can be maintained throughout the plan period, but as set out below that is unlikely.

The predicted annual housing delivery rates appear to be optimistic and very high in comparison to past rates. For example, it is predicted that annual delivery rates would exceed more than 1,000 dwellings for the monitoring years 2022/23, 2026/27, 2027/28 and 2028/29, when in recent years there were only a couple of occasions that annual delivery exceeded more than 500 dwellings. In addition, it is predicted that Allocation Ref. LP39.01 (Land north of Knight's End Road and East of the A141 in March) would deliver 250 dwellings per annum in 2035/36 and 2036/37. An average annual delivery rate of 250 dwellings per annum is equivalent to rates achieved at urban extensions in Milton Keynes and higher than rates achieved at Cambourne new settlement in South Cambridgeshire.

There is no evidence provided to explain or justify annual delivery rates of more than 1,000 dwellings per annum for a number of years during the plan period, or annual delivery rates of 250 dwellings per annum at a strategic allocation in March. It is very unlikely that the predicted housing delivery rates will be achieved. However, the limited housing land supply buffer means that there is no flexibility in the supply to deal with any delays to housing delivery and would very likely lead to a housing land supply shortfall. The predicted housing delivery rates contained in the housing trajectory should be adjusted to reflect past delivery rates and the housing market in Fenland.

Requested Change

It is requested that the housing trajectory in Table 10 is amended to include more realistic delivery rates based on evidence and previous monitoring data, including at the larger strategic allocations.

It is requested that the housing land supply includes a larger buffer to deal with potential delays to housing delivery, which would require additional land to be allocated in draft FLP.

23: Sites - Introduction

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

Table 9: Summary of Distribution of Housing Growth
COMMENT

Table 9 identifies the amount of development directed to each settlement. It is acknowledged that some housing should be directed to settlements in the rural areas to meet housing needs and support existing services and facilities. However, it appears that some of the medium villages are expected to accommodate a disproportionate amount of development compared to the larger settlements including the market towns. For example, the medium villages of Coates, Elm and Friday Bridge are all expected to accommodate more than 200 dwellings during the plan period, despite having a limited range of services and facilities. It is considered that additional land is available at the market towns, where a good range of serviced and facilities are available and there is access to bus and rail services. As set out in the representations to Part D of draft FLP, it is requested an additional allocation is made in March at land off Wimblington Road (Ref. 40257), since only part of the site is subject to flood risk and it is protected by flood defences and the promoted development could avoid these areas.

24: Market Towns

Title:		Position:	
First Name:	William	Organisation:	
Surname:	Gale		
Comment		Object	
Nowhere do you show any plan regarding the circling of Chatteris by aircraft from Doddington Airfield.			

Title:		Position:	
First Name:	Ian	Organisation:	
Surname:	Mason		
Comment		Support	
Chatteris - Paragraph 24.38 page 133			
It mentions a National Museum which is obviously the Police Firearms Officers Association Museum but completely ignores the much older Town Museum of local and social history. It is amazing that former Mayor's and the Town Council Trustees have made such an issue of it punching above it's weight and being of recognised importance in the now Fenland Six group of Accredited Museums, but because it has closed for re-development it seems to have been forgotten about.			

Title:		Position:	
First Name:	Ian	Organisation:	
Surname:	Mason		
Comment		Neutral	
Chatteris - Paragraph 24.41, page 134			
Boating activities are cited yet I have no idea where and how they can justify that. Chatteris has no boating clubs and no facilities. Attempts by Fox's Boatyard at March to encourage development of a Marina at Chatteris and access to the Town via the 40' into Fenton Lode or 20' drain has never been supported by the Town Council or FDC. The closure of the 40' by Anglian Water at Horseway Lock and cessation of the route through Welches Lock & Dam to the Old Bedford River is a continuing blow to boaters and tourism. Attempts by the Fenland Waterways group and Inland Waterways Association have failed to resolve this albeit there may be some hope if the proposed Fenland Reservoir is to be accessed by the 40'. If this is the case why isn't it in this local plan for Chatteris and Manea ?			

24: Market Towns

Title: Mr **Position:**

First Name: Ian **Organisation:**

Surname: Mason

Comment **Object**

Chatteris - Paragraph 24.41, page 134

Public rights of way. Despite attempts to improve rights of way and develop other walking opportunities it is still obvious there is little incentive or support for this. The Black Fen Way and The Millennium Walk have never been maintained and are now almost lost through poor signposting and failing to keep up permissions with relevant land owners. The route to Somersham along the old railway line is a case in point. Lack of support from FDC and and poorly orchestrated attempts to use it along with circular routes via the Little Acre Fen Pocket Park have again wasted opportunities to provide better public amenities. The fact that the national Meridian Trail runs from March via the railway line to Somersham seems to be another tourism opportunity missed.

Title: Mr **Position:**

First Name: Ian **Organisation:**

Surname: Mason

Comment **Neutral**

Paragraph 24.41, page 134

This paragraph includes: "Develop the 'Chatteris Outdoors platform' to improve access to and use of our countryside, and develop this as a key attractor for our town." What is this ? Is it Local Green Space ? This need clarifying please !

Title: **Position:**

First Name: Nigel **Organisation:**

Surname: Ransome

Comment **Object**

Wenny Meadows should be a totally protected area and not be developed. It will maintain a reasonable outdoor area for the people to use as open space and not be surrounded by an ever extending "concrete jungle" for not only the townsfolk but also nature. In this world where climate change is a hot topic and "rewilding" is a hot topic to prevent global warming I am at a loss as to how the town council and yourselves could even consider the destruction of this open space.

Clearly the Town Council in Chatteris have an agenda to increase revenue but as little or none of this revenue will benefit infrastructure of the town as well as education and medical facilities sacrificing Wenny Meadows will not benefit the town.

I strongly object to this area to be developed for the benefit a few rather than the many.

24: Market Towns

Title:	Mr	Position:
First Name:	Mark	Organisation:
Surname:	Hemment	
Comment	Neutral	

Paragraph 24.41:

Agree the number of public rights of way is somewhat limited in Chatteris.

Title:		Position:
First Name:	Kathryn	Organisation:
Surname:	Hearn	
Comment	Object	

Para 24.42

The document pays 'lip service' to the idea of developing a Chatteris Outdoors Platform and developing a 'key attractor for the town' whilst wanting to build on the main site of natural biodiversity and ancient woodland on Wenny Meadow. This seems like a destructive act. Chatteris has minimal fully grown trees and though Pocket Park is a worthwhile initiative cannot be compared to the significance of Wenny Meadow.

24: Market Towns

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

Comment **Neutral**

WISBECH

Anglian Water has had a long-term commitment with other stakeholders, to inspire broader change and transformation to drive socio-economic regeneration in the town through the Wisbech Regeneration project. Wisbech is at the heart of our operating area, and our involvement gave an ability to focus on building strong, long-term working relationships with local stakeholders and to help develop larger, strategic, collaborative proposals for transformational change. This has continued through the Future Fens Integrated Adaptation Project (outlined in our response to Policy LP4 Securing Fenland's Future). We support the preparation of a masterplan for Wisbech town centre regeneration (Policy LP35).

We note that the draft Cambridgeshire and Peterborough Combined Authority Local Transport and Connectivity Plan5 (LCTP) was published for consultation in May 2022 and specifically refers to various options for Wisbech Rail and the proposed garden town as part of regenerating Wisbech at its heart:

"Wisbech Rail - Construction of a new link to Wisbech will transform accessibility of the town. Options for rail, ultralight rail, and other high order transit such as tram/Light Rail Transit and Bus Rapid Transit are being considered. Residents and businesses in Wisbech would benefit from being able to reach Cambridge directly, connecting them to the opportunities within Greater Cambridge, including well-paid, skilled roles in the knowledge economy, retail, leisure, education and training opportunities at the University of Cambridge, Anglia Ruskin University and Cambridge Regional College. It will also play a key role in supporting the ambition for Wisbech Garden Town, helping to secure the viability and delivery of additional development."

However, the Local Plan does not refer to the potential of a garden town at Wisbech as part of the growth strategy, even though this was also identified as part of the Wisbech Regeneration project. It would be helpful to understand whether this option has been dismissed as a clear long-term proposal for the town given the LCTP proposals for public transport/rail and the FF:IA manifesto4. See: <https://www.anglianwater.co.uk/siteassets/household/in-the-community/future-fens-integrated-adaptation-manifesto-november-2021.pdf>

MARCH

Anglian Water notes that March, as the second largest settlement in the district, is allocated the greatest amount of housing as part of the spatial strategy given the transport links, services, and facilities available with potentially fewer constraints to growth than other settlements in Fenland.

WHITTLESEY

We have no comments on the proposed allocation sites as all residential sites have the benefit of extant planning permission and new employment allocations are in locations where our assets are not affected.

Title:		Position:	
First Name:	Marion	Organisation:	
Surname:	West		
Comment	Neutral		
Wenny Meadow, Chatteris			
Chatteris has little enough to offer. One preserved green space isn't too much to ask.			

24: Market Towns

Title:		Position:
First Name:	Hazel	Organisation:
Surname:	Rudd	
Comment	Neutral	
Wenny Meadow, Chatteris		
We desperately need to protect this green space for wildlife!		

Title:		Position:
First Name:	W	Organisation:
Surname:	Wilson	
Comment	Neutral	
Chatteris is already overborne with people we have neither the infrastructure or means to support more 1 x doctor's surgery and no public transport.		

Title:		Position:
First Name:	Martyn	Organisation:
Surname:	Lancaster	
Comment	Object	
March - policies LP38,39,39.2		

It indicates areas for future housing. It includes 13.7 hectares, (about 294 houses), on land to the north of Estover Road and between the Berryfield estate and the Estover Playing Field, and east of the new housing currently being built at the end of Berryfield. in March. While there are policies for other areas of housing in the town, there appears to be no policy for this area. Why not?

This area was the subject of a planning application, by St. Johns College, a few years ago, but the District Council refused it. The applicants appealed against that decision but the Planning Inspector on behalf of the Secretary of State, dismissed that appeal on the grounds, "the proposal would be a major visual intrusion into the open countryside". That meant The Secretary of State considered this area was unsuitable for housing. Why is Fenland District Council, now proposing, this area for major housing development? Not only would this proposal be contrary to the Secretary of State but would further increase extra traffic on the already congested road network.

March 2,746 26% This is a huge amount of homes for a town like March , but the local plan really doesn't cover any infrastructure just lots of fluffy words. No real thought about sport facilities ,Doctors ,Dentists etc . More importantly schools, hospitals. At present your plan seems to put more buses on the road.

137 (of 213) of your attachment, the site allocation “Land Southeast of 433 Wisbech Road should read “North East of March and this covers the area down Estover road, land between Estover playing field and Berryfields

March 53.91 25% Industrial sites ?? up and down the country we have a glut of faculties laying closed ??

24: Market Towns

Title:

Position:

First Name: Victoria

Organisation:

Surname: Halmsshaw

Comment **Object**

With so much housing already having planning approval, you, the district council need to provide the infrastructure to support it, as we (Chatteris) are becoming a commuter town.

You can't see an NHS dentist, buy shoes or wellies, clothes to suit an older population. We now have no bus service to Ely / March so unless you have access to independent transport, you are stranded in a town of takeaways, estate agents, cafes and hair/nail salons.

Title:

Position:

First Name: Clare

Organisation:

Surname: Howard

Comment **Object**

Title:

Position:

First Name: Alan

Organisation:

Surname: Bessant

Comment **Object**

Point 24.30 (Page 130)

Hanson Brick are no longer an employer in Whittlesey. This should read Forterra.

Forterra may not be a key local employer as staff numbers have dropped with modernisation. It would be sensible to survey the larger local businesses and see who are the major employers and the skill sets they need. Forterra employs 265 people. We also do not know how many are from Whittlesey – many may come from Peterborough.

LP35: Regeneration of Wisbech

Title:

Position:

First Name: Richard

Organisation: Richard Brown Planning Limited

Surname: Brown

Comment

Object

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

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

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

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

Policy LP8 confirms

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

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

provided by Policy LP8 – Wisbech confirms:

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

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

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

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

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

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

LP35: Regeneration of Wisbech

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

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

It is also confirmed at paragraph 7.14 that

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

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

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

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

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

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

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

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

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

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

7. Urban extensions/NPPF

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

LP35: Regeneration of Wisbech

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

8. Development Plan/Broad Concept plan/phasing

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

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

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

9. Flood Plain/Sequential Test

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

10. Duty to co-operate

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

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

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

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

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

11. Conclusions

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

LP35: Regeneration of Wisbech

community facilities located on the eastern edge of Wisbech.

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

LP35: Regeneration of Wisbech

Title:

Position:

First Name: Richard

Organisation: Richard Brown Planning Limited

Surname: Brown

Comment

Object

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

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

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

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

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

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

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

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

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

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

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

LP35: Regeneration of Wisbech

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

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

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

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

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

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

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

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

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

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

It is also confirmed at paragraph 7.14 that

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

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

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

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

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

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

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

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

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

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

7. Urban extensions/NPPF

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

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

8. Development Plan/Broad Concept plan/phasing

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

LP35: Regeneration of Wisbech

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

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

Flood Plain/Sequential Test

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

10. Duty to co-operate

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

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

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

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

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

11. Conclusions

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

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

LP35: Regeneration of Wisbech

Title:		Position:	Sustainable Places Planning Adviser - Ea
First Name:	Andrew	Organisation:	Environment Agency
Surname:	Thornton		
Comment	Neutral		
This policy should be strengthened with reference to the Future Fens Integrated Adaptation programme.			

LP35.01

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, there are a number of grade II listed buildings nearby along North End and Lynn Road.

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:	Peter	Organisation:	Peter Humphrey Associates Ltd
Surname:	Humphrey		

Comment Object

I fail to see how Wisbech East can be de-allocated from the 2014 Board Concept Plan when it was then a preferred allocation.

Wisbech East, from the 2014 Board Concept Plan, should be allocated. Wisbech East is a sensible and logical allocation of Wisbech, as the whole site is Flood Zone 1 risk area.

LP36: Residential Site Allocations for Wisbech

Title:		Position:	Senior Sustainable Development Officer
First Name:	Eleanor	Organisation:	King's Lynn Internal Drainage Board
Surname:	Roberts		

Comment **Neutral**

Thank you for your consultation on the Fenland District Council's Emerging Local Plan.

Part of the eastern section of Fenland District Council's area is within the Internal Drainage District (IDD) of the King's Lynn Internal Drainage Board (IDB) and therefore the Board's Byelaws apply to sites which fall within the IDD. Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents.

I note the allocation of sites for development which may require Land Drainage Consent from the Board, therefore please be aware of the potential for conflict between the planning process and the Board's regulatory regime. Below is a summary of the Byelaws the Board most frequently regulates with regard to development sites within its IDD, and advice for planners and developers. We will endeavour to comment in more detail on site specific planning applications.

Where consents are required, the Board strongly recommends that these are sought from the Board prior to determination of this planning application. The annexe at the end of this letter outlines the Board's regulatory function and how to apply for Land Drainage Consent.

The following table outlines the sites which are within or partially within the Board's IDD therefore the Board's Byelaws will apply to any development on these sites.

Policy: LP36.07

Site ID: 40056

Site Location: College of West Anglia, Elm High Road

Watercourses that may be affected: Western boundary adjacent to a Board Maintained watercourse DRN145P1101 – College Drain.

Policy: LP36.02

Site ID: 40158

Site Location: Land south of Meadowgate School

Watercourses that may be affected: Southern boundary adjacent to a Board Maintained watercourse DRN145P1101 – College Drain. Consent granted in 2019 for works within 9 metres (Byelaw 10).

Policy: LP37.02

Site ID: 40004

Site Location: River Nene frontage, Wisbech

Watercourses that may be affected: No watercourses adjacent however this should be confirmed by the developer.

Policy: LP36.06

Site ID: 40025

Site Location: Land East of 46 Old Lynn Road

Watercourses that may be affected: Eastern boundary adjacent to a Board Maintained watercourse DRN145P1009 – Goodales Dyke. Northern boundary adjacent to a riparian watercourse.

Policy: LP36.13

Site ID: 40509

Site Location: Wisbech Vehicle Exchange, Old Lynn Road

Watercourses that may be affected: Riparian watercourse adjacent to northern corner of allocation site.

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Following is a summary of the Byelaws the Board regulates most frequently with regard to new development, which planners and developers should be aware of.

Byelaw 3 (Surface Water)

We recommend that a drainage strategy is provided with any planning application. If the applicant proposes to discharge surface water to a watercourse, consent would be required under Byelaw 3. Please note that we recommend that any discharge is in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), therefore the Board is unlikely to grant consent for discharges in excess of greenfield rate.

If an applicant intends to dispose of surface water by infiltration, we recommend that ground investigation is carried out to determine infiltration potential, followed by testing in line with BRE Digest 365 if onsite material is considered favourable for infiltration. If infiltration is not feasible at this site, following the drainage hierarchy we would expect the applicant to propose to discharge surface water to a watercourse. In this case, consent would be required under Byelaw 3. Please note that we recommend that any discharge is in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), therefore the Board is unlikely to grant consent for discharges in excess of greenfield rate.

If an applicant proposes to discharge surface water to a sewer, please note that this is the least sustainable method of surface water disposal within the drainage hierarchy. I recommend that in this case the planning officers satisfy themselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in the location of the proposal.

Byelaw 3 (Treated Foul Water)

If the applicant proposes to discharge treated foul water to a watercourse for any reason, consent would be required under Byelaw 3.

Section 23, Land Drainage Act 1991

Where there is a watercourse (whether riparian or Board Maintained) within or adjacent to a site boundary, should the applicant's proposals include works to alter the watercourse consent would be required under the Land Drainage Act 1991 (and byelaw 4).

The Board recommends that adequate space (3-5 metres) is left flat and free from obstruction adjacent to a riparian watercourse in order to enable maintenance by future riparian owners or a designated maintenance company/contractor.

Byelaw 10

Should an applicant's proposals include works within 9 metres of a Board Maintained watercourse consent is required under Byelaw 10.

Please see the supplementary information overleaf for further detail on the Board's policy and consenting process.

If, following review of our comments and supporting policy documents linked below, you wish to discuss any of the requirements I have raised, please contact the Board using the details at the head of this letter.

How to Apply for Land Drainage Consent

To apply for Land Drainage Consent please complete an application form.

Application forms, application fees and 'Frequently Asked Questions' can be found on the 'Development' section of the Board's website, here:

<https://www.wlma.org.uk/kings-lynn-idb/development/>

For any additional help please call us on 01553 819600 or email planning@wlma.org.uk.

Byelaws

King's Lynn IDB Byelaws can be found via the following link: https://www.wlma.org.uk/uploads/KLIDB_Byelaws.pdf.

Mapping

LP36: Residential Site Allocations for Wisbech

Mapping of the district can be viewed via the following link:

https://www.wlma.org.uk/uploads/128-KLIDB_index.pdf.

Planning and Byelaw Strategy

The Board's Planning and Byelaw Strategy seeks to provide:

- Guidance on how (and why) the Board will review and comment on planning applications.
- Information on the policies against which the Board will assess and determine applications.
- Guidance to riparian (waterside) landowners regarding watercourse maintenance.

The Planning and Byelaw Strategy can be found via the following link:

https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf

Arterial Watercourses

Maps on the Board's website show which watercourses are designated as Arterial Watercourses by the Board. You may also have heard these watercourses referred to as 'Main Drains' or 'Maintained Watercourses'. The designation is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB using the Board's Permissive Powers. Although the Board opts to proactively maintain this arterial network, there is no change in the ownership or liability associated with the watercourse resulting from this designation.

Why we have commented on this application:

By engaging with the planning process the Board is seeking to:

- Reduce flood risk to communities within the Internal Drainage District
- Promote sustainable development in sustainable locations by supporting sound planning decisions in accordance with the National Planning Policy Framework (especially Paragraph 167) and the Non-standard technical standards for SuDS.
- Reduce the potential for conflict between the planning process and the Board's regulatory process.

For further information please refer to the Board's Planning and Byelaw Strategy.

LP36: Residential Site Allocations for Wisbech

Title:

Position:

First Name: Richard

Organisation: Richard Brown Planning Limited

Surname: Brown

Comment

Object

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

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

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

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

Policy LP8 confirms

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

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

provided by Policy LP8 – Wisbech confirms:

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

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

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

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

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

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

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

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

It is also confirmed at paragraph 7.14 that

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

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

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

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

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

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

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

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

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

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

7. Urban extensions/NPPF

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

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

8. Development Plan/Broad Concept plan/phasing

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

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

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

9. Flood Plain/Sequential Test

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

10. Duty to co-operate

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

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

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

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

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

11. Conclusions

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

LP36: Residential Site Allocations for Wisbech

community facilities located on the eastern edge of Wisbech.

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

LP36: Residential Site Allocations for Wisbech

Title:

Position:

First Name: Richard

Organisation: Richard Brown Planning Limited

Surname: Brown

Comment

Object

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

It is also confirmed at paragraph 7.14 that

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

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

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

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

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

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

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

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

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

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

7. Urban extensions/NPPF

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

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

8. Development Plan/Broad Concept plan/phasing

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

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

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

Flood Plain/Sequential Test

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

10. Duty to co-operate

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

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

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

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

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

11. Conclusions

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

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

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LP36: Residential Site Allocations for Wisbech

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

Comment Object

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

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

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

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

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

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

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

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

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

LP36: Residential Site Allocations for Wisbech

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

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

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

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

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

SUMMARY

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

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

LP36.04 – East Wisbech – 900 dwellings

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

LP36: Residential Site Allocations for Wisbech

Title:	Mr	Position:	
First Name:	John	Organisation:	Maxey Grounds
Surname:	Maxey		
Comment	Object		
site 40256			

We wish to object to the omission of allocation of the above site, as an extension of the Glendon gardens development. Whilst any scheme would need to respect and leave a buffer between the development and the Roman Bank, in our view there is scope for a high quality scheme on part of this site west of Glendon Gardens with access obtained from that development as previously proposed.

Given the extent of development approved in the area, and allocation in closer proximity to the River Nene at similar flood risk, it is clear that development can be safe in this location.

We are aware that the developer having available access is wishing to deliver additional units on this site. We consider part of this land should be added as an additional allocation for Wisbech.

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

The allocation omits the East Wisbech allocation within the 2014 Fenland Local Plan. Omission of this area, where development consent is currently being sought by several planning applications, is unsound for the following reasons:

- 1) It fails in the duty to cooperate with West Norfolk given the East Wisbech allocation is a joint cross boundary allocation by the two local authorities and the West Norfolk Local Plan is at submission stage assuming continued allocation of this land.
- 2) It fails to follow the sequential test on flood risk in that East Wisbech is predominantly Flood Zone 1 and is the only significant area of potential allocation at Wisbech that is predominantly Flood Zone1
- 3) The area has an adopted BCP and development is now being delivered in this area in accordance with this BCP, since FDC have indicated a willingness to consider a phased scheme rather than seeking a single application for the whole of this significant application.
- 4) Delivery is likely to be achieved in the early plan period as a result of the current and forthcoming applications for the majority of the area which will be determined under the current plan policies.
- 5) The scale of allocation for Wisbech is insufficient given its position as the largest of the Market Towns and the one with largest existing employment base and allocated commercial development provision. The location of housing should follow the scale of commercial development envisaged.
- 6) The Sites Evidence report refers to a political decision being made to exclude on the basis of absence of evidence of progress. That assessment is now clearly superseded by events , further applications and events, and out of date.
- 7) On this basis it is illogical to exclude this area from allocation.

LP36: Residential Site Allocations for Wisbech

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

Comment **Neutral**

The County Council has been working with the Department for Education on establishing a new secondary school in Wisbech. The lower allocation of housing in the town, notably the deletion of the East Wisbech Strategic Allocation is a concern with the reduced pupil yield arising from new development potentially impacting on the delivery and long-term viability of the new secondary school.

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

Comment **Neutral**

Site allocations, LP36.08 and LP36.11 are within the Consultation Area for Wisbech Port, Wisbech TIA. Development will need to ensure that at it does not prejudice the use of the port as per Policy 16 of the MWLP.

LP36: Residential Site Allocations for Wisbech

Title: Position: Graduate Planner

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

Surname: Wilkinson

Comment Object

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

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

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

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

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

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

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

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

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

LP36: Residential Site Allocations for Wisbech

Title:	Ms	Position:	Chartered Town Planner
First Name:	Shanna	Organisation:	Swann Edwards Architecture Limited
Surname:	Jackson		
Comment	Neutral		
land submission 40213			

Consider that this should have been allocated as the site has previously been allocated under policy LP8 of the 2014 Local Plan and it is still immediately available for development. The site adjoins the established Primary Market Town of Wisbech, is in close proximity to the town centre and is located within Flood Zone 1. The principle of developing the land has been supported recently at planning appeal.

Indicative drawings included within planning application F/YR18/0159/O demonstrate that the site is capable of accommodating 28 dwellings of a scale which is commensurate with the existing development to the north and west however on the basis of the 33 dph guidelines set out in the Site Assessment Methodology, the site could accommodate up to 43 dwellings.

Concerns raised at appeal with regards to the access can be addressed. There have been no significant changes to the site or the surroundings since the land was previously allocated and it therefore remains that the use of the site as a residential allocation is appropriate.

LP36: Residential Site Allocations for Wisbech

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

Comment	Object
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Policy LP36: Residential Site Allocations for Wisbech	
OBJECT	

Policy LP36 identifies the proposed new residential allocations for Wisbech and provides a list of housing commitments. Foster Property Developments has an interest in land off Kinderley Road in Wisbech (Ref. 40255) and requests that this site is also allocated in draft FLP for up to 77 dwellings. 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 on the countryside, access arrangements, and flooding. 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 Wisbech. As highlighted in the representations to Policy LP12, the affordable housing requirement for developments in the northern part of the District is 10%, and this would apply to the proposed allocations and housing commitments in Wisbech. It is noted that a number of the proposed allocations and housing commitments are small and would deliver 10 or less dwellings, and as such would be required to provide no affordable dwellings or only one or two affordable dwellings. For these reasons additional allocations are needed in Wisbech to increase the supply of affordable housing in this settlement. It is also noted that a number of the allocations and housing commitments already have planning permission and would mostly be delivered in the short term. It appears that there is a limited strategy in draft FLP towards addressing housing and affordable housing needs in Wisbech during the middle and later years of the plan period. It is considered that additional allocations are needed in Wisbech that would be delivered in the post-2025 period.

Additional Allocation at land off Kinderley Road in Wisbech (Ref. 40255)

The land off Kinderley Road in Wisbech (Ref. 40255) 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, 100% of the site is located within Flood Zone 3. In addition, the site relates poorly to the built form and would adversely impact on open character of countryside. Access is constrained, requiring major infrastructure and/or third party land".

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 located within Flood Zone 3 but benefits from flood defences. It is noted that planning permission has been granted for other developments in Wisbech that are 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 proposed in draft FLP that those sites with planning permission that include land within Flood Zone 3 should be carried forward as allocations i.e. LP36.04, LP36.06, LP36.08, LP36.09, and LP36.10. The decision to grant planning permission and allocate sites in Wisbech on land within Flood Zone 3 demonstrates that it is possible to successfully mitigate the impacts of flood risk in this location, through a detailed assessment and planning conditions. 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 noted that the other rejected sites in Wisbech assessed in the Site Evidence Report were not allocated for flood risk reasons or other reasons including remoteness of location, impact on character and loss of employment land. It is requested that promoted sites are 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.

The site is located immediately adjacent the settlement boundary for Wisbech. There is an established residential area to the south of the site. Waterlees Road provides the eastern and northern boundary of the site. There are mature trees and hedges along the site boundary with Waterlees Road. There are no views of the site from the west at

LP36: Residential Site Allocations for Wisbech

Osborne Road because there are trees and hedges at the field boundaries. There is a long-distance view of the site from the north at First Marsh Road, but that view shows vegetation and some buildings at the edge of the settlement. A public footpath exists along the north western edge of the promoted site, providing a route from Waterlees Road to Tindall Court, but it does not appear to be well used. The route of the public footpath could be retained and incorporated into the promoted development at the site. The promoted development would seek to retain the existing vegetation at the site boundary and include additional landscaping within and on the edge of the site. The promoted development would represent a logical extension to the existing settlement. 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.

The proposed site access for the promoted development would be through the existing parking area serving Nos. 73-99 Kinderley Road. Foster Property Developments has an agreement with the owners of this property that allows for an access to be created and for the existing parking area to be re-provided within the promoted development. A letter from Accent is submitted with these representations confirming that an access can be provided from their land off Kinderley Road into the site. It is requested that the comments in the site assessment about the site access arrangements are amended, since an access to serve the promoted development can be provided.

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 off Kinderley Road in Wisbech (Ref. 40255) is allocated in draft FLP for residential development, with the following matters specified in the site-specific allocation:

- Number of Dwellings: 77 dwellings including affordable
 - Site Area: 2.01 Ha
 - Development should include:
 - o an assessment of flood risk
 - o a suitable vehicular access and footway and cycleway connections
 - o where possible retain existing hedgerows
 - o provide landscaping and planting at the northern boundary to reduce visual impacts
 - o the existing public footpath from Waterlees Road to Tindall Court
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LP36: Residential Site Allocations for Wisbech

Title:	Mr	Position:	
First Name:	Stephen	Organisation:	Norfolk County Council
Surname:	Faulkner		

Comment	Object
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Norfolk County Council objects to the de-allocation of strategic housing sites in Wisbech.

Norfolk County Council's assessment of the Fenland Local Plan (Reg18) suggest this would raise significant concerns regarding the proposed de-allocation of strategic housing site/s in and around Wisbech, particularly the current allocation which is contiguous with the allocation in the King's Lynn and West Norfolk Local Plan for 550 dwellings in Walsoken. The West Norfolk allocation had assumed close collaborative / partnership working in respect of education provision. It envisaged a new developer-funded primary sector school being provided across the two Local Authority housing sites; and developer funding towards improvements / increase in capacity at the nearest High School in Wisbech.

Primary:

Without the contiguous strategic housing allocation in Wisbech; the Walsoken allocation, which is too small on its own to justify a new primary sector school, would require the surrounding schools in Norfolk to be expanded in situ where this is possible. The surrounding schools of Emneth, Marshland St James, West Walton or Walpole Highway would have very little capacity to accommodate the additional children from just this development. And even if developer-funding could be secured there would be significant issues arising in terms of transport costs; and the wider sustainability and safeguarding issues associated with transporting young children to such schools. There is the possibility that parents from the Walsoken development could elect to take their children to out of catchment Cambridgeshire Schools subject to availability etc, however, Norfolk County Council has a legal duty to provide places for such children in its schools.

Secondary:

Similar issues are raised to primary in the event of housing allocations being dropped in Wisbech and Children needing to be accommodated within the catchment Norfolk Schools at Marshland High; and / or St Clements High, both of which are some distance from Walsoken and would require transporting children to these school/s.

Given the above cross-boundary issues arising from any potential de-allocation of housing in Wisbech, the County Council has significant concerns about such an approach and the sustainable delivery of allocated housing in Walsoken.

Strategic Transport:

Furthermore, the County Council as Highway Authority has concerns regarding the proposed de-allocation of housing sites in and around Wisbech, particularly the East Wisbech strategic allocation for around 900 dwellings which is contiguous with the allocation in the King's Lynn and West Norfolk Local Plan for 550 dwellings in Walsoken.

The transport evidence that supported the Walsoken allocation had assumed the previously planned growth in Wisbech and relied on the East Wisbech allocation for access and connectivity to Wisbech where the vast majority of services and jobs are located. The consultation does not consider the impacts of the proposed allocation in Walsoken or attempt to set out how it should be connected to Wisbech.

The current proposal deallocating sites in Wisbech raises significant transport issues of evidence and connectivity for the proposed allocation in Walsoken and this must be considered in the development of the plan.

Summary:

The proposed de-allocation of strategic housing sites in Wisbech raises significant cross-boundary concerns to Norfolk County Council as both local education authority and highway authority. In particular, it raises strategic concerns in

LP36: Residential Site Allocations for Wisbech

terms of the sustainable delivery of the neighbouring housing allocation in Walsoken (550 dwellings).

LP36: Residential Site Allocations for Wisbech

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

Comment	Object
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In this respect, we note that there is land in Wisbech that is within Flood Zone 1 that is not allocated for development, while other sites that are within Zones 2 or 3 are proposed. We also note that in the past the council has granted planning permission on sites that fall within Flood Zone 2 or even Flood Zone 3. This cannot be right and is contrary to government guidance regarding the sequence in which sites should come forward.

NPPF paragraph 161 requires all plans to apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

Paragraph 162 states the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.

The Fenland Level 1 Strategic Flood Risk Assessment June 2022 includes reference to the allocated East Wisbech allocation in the adopted local plan. That land is Flood Zone 1, with low risk of flooding, and thus should be considered to be in the topmost favourable list of sites to be allocated if there is a strategic development need. That need clearly presently exists, and the emerging local plan is being prepared to manage the delivery of houses to meet that need for the period to 2040. The only reason why the land could justifiably not be allocated is if there is sufficient Flood Zone 1 land in the council's area to meet local plan requirements, such that additional land in Zones 1 and 2 should also be allocated, or if there are other detailed reasons why the site is unsuitable for development. The Sequential Test demands that it be allocated in the absence of any other constraints.

In support of the allocation of the site, it is a material consideration that it is already considered suitable for development by virtue of its allocation in the adopted local plan. The fact that that allocation is part of a larger potential development project is unimportant in that respect, because the relationship of the site to its surroundings is not relevant to the fresh proposals in the draft plan given that the previous wider allocation is now dropped. The manner in which the land has been considered in the background to the local plan is, however, seriously flawed.

The SHELAA report on the East Wisbech allocation maintains the approach of the adopted local plan - that the site is a single potential allocation of substantial size and considers its availability and deliverability in that context – “The site has previously been determined to be suitable for development through the previous local plan process. The site assessment process continues to be suitable for development. (sic) However, there are uncertainties around the deliverability of the site, with different landowners bringing forward the site.”

This undeliverability, however, is in relation to the site as a whole, not in relation to the suitability and deliverability of the individual parts. Allocation of a smaller part does not seem to have been considered. That is apparent also in consideration of the Draft Local Plan - Sites Evidence Report (Part D) (August 2022).

In rejecting the site, the Evidence Report confirms “A strategic political decision was taken to remove any existing Broad Concept Areas without significant progress towards a planning application on the grounds of the failure to deliver”. That failure was in respect of the whole strategic allocation, not parts of it. It was alleged to be in accordance with the Council's growth strategy which seeks to deliver proportionate growth across settlements at deliverable sites. The result of removing the whole allocation without consideration of the appropriateness of parts has meant in the case of Wisbech that growth allocated to Wisbech has now been significantly downgraded from the previous local plan to a level below that of smaller market towns. In essence, the decision to remove the allocation has had the opposite effect of that intended, of fostering suitably scaled growth in appropriate locations.

LP36: Residential Site Allocations for Wisbech

Parts of the site are suitable for development, including the land off Stow Road to which these representations relate, as also evidenced by the submission of two recent planning applications. Although those applications remain contrary to the adopted local plan, the council's decision to remove the East Wisbech SUE will open up additional areas if the present draft local plan proposals are taken through to the Regulation 19 Plan and submitted for Examination.

In terms of the suitability of parts of the larger allocated site to be developed separately, and despite that there seems to have been no such local plan-based consideration, the council has issued a Screening Opinion in relation to the site, which includes references to its suitability for development and its relationship to its surroundings. While it may be the case that the content of the Opinion should not be construed as a consideration of the planning merits of the proposal, the comments made nevertheless set the context for the site.

The Opinion confirms that the site lies adjacent to residential uses in the immediate vicinity to the west, with further residential development to the north. "Whilst the development will likely have its own localised impact, the development is set adjacent to residential uses and accordingly would be largely compatible with existing development in the vicinity. The visual impact from development of the site is likely to be fairly localised and will be experienced mainly in the context of the residential developments adjacent. the most notable impact will be from additional traffic and pedestrian movements. Thus, it is unlikely that the cumulative impact of the development with existing development will be significant."

While there is still reference in the Opinion to the consideration of the site in relation to the SUE, the council's strong rejection of the SUE as a present concept means that it is the site characteristics and relationship to the immediate surroundings that will be important as the draft local plan gains more weight as a part of the development plan as it moves towards adoption.

In summary there are strong reasons why the land off Stow Road identified in these representations should be allocated for development in the draft local plan. The site is in a sustainable location, is preferable in terms of sequential testing to a range of other sites allocated in the plan and will contribute to the future success of Wisbech.

LP36.01

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

Comment Object

Site Allocation LP36.01, SHELAA Ref. 40371, 316 houses, 14.75 ha - (Page 118) (Map 28 Wisbech (Inset))

Land off Halfpenny Lane Land between New Drove and the A47, East of Halfpenny Lane, West of Elm Low Road

It is understood that the allocated site is effectively “land locked” and inaccessible from the existing highway network.

The Commissioners, acting on behalf of the Hundred of Wisbech IDB, have been in discussion with the developer of the site for some time in respect of a potential access route which requires the piping and filling of a significant length of the Board’s Halfpenny Lane Drain which serves as the outfall for the substantial urban area largely to the north of Weasenham Lane.

The piping and filling of such a large and important watercourse could, during extreme events, increase the risk of flooding to the upstream sub-catchment which recently experienced some flooded roads during a thunderstorm.

It is also contrary to national (Environment Agency), local (Cambridgeshire County Council Flood and Water) and the Board’s policy. It would also be contrary to several of the policies contained within this draft Local Plan document. It is suggested that an alternative point of access, which does not have such implications, is found.

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

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

Comment Neutral

LP36.01 (316 dwellings)

We would support policy amendments to include sustainable drainage and integrated water management given the quantum of dwellings proposed on this greenfield site.

LP36.02

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

LP36.03

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

Comment Object

This site is located in the Wisbech Conservation Area and close to a number of listed buildings including the grade II* 12 North Street and several other grade II listed buildings.

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.

LP37: Site allocations for non-residential development in Wisbech

Title:		Position:	
First Name:	Thomas	Organisation:	Pegasus Group
Surname:	Kilvert		
Comment	Support		
Introduction			

For the reasons outlined below, our client Cannon Kirk (UK) wishes to support the re-inclusion of the South Wisbech strategic allocation (Policy LP37.01) in the Draft Local Plan. These representations will also provide minor suggested amendments to the specific wording of LP37.01 so that viable and deliverable schemes can be delivered within the plan period.

Cannon Kirk is the sole landowner of two parcels located within the western section of Draft Site Allocation Policy LP37.01 (South Wisbech), which lie to the west of Cromwell Road, Wisbech, between the A47 Roundabout and Tesco.

Our client is also the sole landowner of an adjoining parcel of land (6.30ha) to the south and located to the west of the A47. For reasons outlined below, these representations will also explain justifications for why Site Allocation LP37.01 should be expanded to the south to incorporate this additional parcel of land.

The Fenland Employment Needs Report (November 2021) reveals that the total area of the South Wisbech broad location is approximately 90ha, and of this, approximately 85ha remain undeveloped. More generally, the Employment Needs Report outlines some of the broad reasons why progress has been slow since the Local Plan was adopted. This includes insufficient infrastructure connectivity to service employment land; landowner issues; and viability issues caused by flood risk mitigation; and lack of demand from potential end users. Therefore, when allocating and reallocating sites for employment development, it will be important for the Council to have regard to the delivery barriers identified above.

In respect of the relevant barriers to delivering Cannon Kirk's land parcels within Site Allocation LP37.01, firstly, they remain under their sole ownership, and as such, issues of multiple ownership will be avoided.

Secondly, our client considers that there is sufficient scope and land available to retain mature trees and deliver biodiversity net gains.

Thirdly a deliverable scheme can be brought forward that provides a viable drainage solution for the site.

Fourthly, the land parcels allocated under Policy LP37.01 are directly accessible onto Cromwell Road (to the east) and the A47 (to the south-east), so there will be no issues with servicing the allocations through the existing road infrastructure.

Fifty, there is not assessed to be a shortage of demand from end users to occupy the non-residential units. This could include Class B8 uses, with the Employment Needs Report noting that past delivery and committed floorspace show continued demand for B8 uses. Nevertheless, for the reasons outlined below, Policy LP37.01 should be reworded to allow greater flexibility by including retail (Class Ea). This would enable a complementary offering to the existing retail units to the north, which could include trade centres and retail warehouses to be delivered on suitable parts of this allocation, such as the northern section of our client's site.

Our client is not in a position to comment on the wider delivery status of other parcels outside their land within the allocation. Nevertheless, South Wisbech remains a vitally important strategic 'gateway' location, which can assist in meeting the District's growing employment needs.

It should also be noted that Pegasus Group has submitted representations on behalf Gc No.27 Limited for a land parcel to the east also located within Site Allocation LP37.01. This part of the site allocation is also deliverable within the plan period, with a new employment use application due to be submitted in the short term.

LP37: Site allocations for non-residential development in Wisbech

To ensure that Site Allocation LP37.01 is fully delivered within the plan period, our client recommends slightly rewording the policy to provide greater flexibility.

Local Policy LP8 largely provides an overview of South Wisbech as a 'broad location for growth' without providing much in the way of specific details for the intended uses, other than the area will be "predominately for business purposes"... "with some potential for residential development in the eastern half." In contrast, Site Allocation LP37.01 states that development proposals should "provide a mix of employment uses, including uses within classes B and E(g))." It is important to understand the current context of the existing users that this part of the allocation adjoins.

Cromwell Road is predominantly a retail and employment location (Class E and Class B). The parcel of land to the north adjoins a mixed-use site with a Tesco Extra, a cinema, a gym and an Italian Restaurant, with storage and distribution uses (B8), warehouse retail units and trade counters (Class E) located beyond this on either side of Cromwell Road. Therefore, given that Site Allocation LP37.01 adjoins a mix of uses, the policy should be reworded to enable greater flexibility and allow the end users of the site to be tested by market demands. Given that this is a gateway site that wasn't delivered in the current plan period, there needs to be maximum flexibility to allow this allocation to come forward in the emerging plan period.

Cannon Kirk also considers that there may be some potential for residential development closest to the existing Tesco site. This could form part of a mixed-use scheme with the residential being located in the flats above other retail/employment uses.

It is also recognised that in accordance with Draft Policy LP16 (Town Centres) that a retail impact assessment test will be required for any development proposed over 500sqm of retail floorspace.

Consequently, as a result of the above it is proposed that the policy should be reworded as follows:
Provide a mix of employment uses, including uses within classes B and E, with the scope for residential development (C3), where the allocation adjoins existing residential or retail uses.
*subject to a retail impact assessment for proposed retail floorspace exceeding 500sqm in accordance with Policy LP16 (Town Centres)

In addition, as mentioned above, our client considers that there is scope to include their southern land ownership parcel within Site Allocation LP37.02. The 6.30ha land parcel is strategically located, as it fronts directly onto the Cromwell/A47 roundabout and extends along the southern A47 corridor. The additional land parcel has the scope to deliver a more comprehensive scheme, with potential retail or employment uses (B, E(a)* E(g)) to the north of this additional parcel. To the south of this unallocated parcel, there is the potential for an appropriate landscaping and planting scheme to reduce visual impacts on the landscape and assist with creating biodiversity net gains.
Consequently, as a result of the above, it is proposed that the policy should be reworded as follows:

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

Comment	Neutral
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There is no requirement to consider suitable access and footway and cycle connectivity despite transport connectivity being sighted as an issue in terms of economic growth in Wisbech earlier in the Local Plan. This is particularly important as Wisbech and March have the lowest level of cycling in the county. It is recommended that under Policy LP37 and LP40 that a requirement for “suitable access and footway and cycleway connectivity” be included to promote walking/cycling between the home and employment locations.

LP37: Site allocations for non-residential development in Wisbech

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

Development within site allocations LP37.02 and LP37.08 will need to comply with Policy 16 of the Minerals and Waste Local Plan. This requires that “development which would result in the loss of or reduced capacity of such infrastructure will not be permitted unless it can be demonstrated that either: (a) the loss or reduced capacity will have no impact on the ability of minerals or waste to be transported by sustainable means, both now and for accommodating future planned growth; or (b) alternative, suitable and sufficient capacity is to be developed elsewhere (and in which case the authorities are likely to require it to be implemented before the loss or reduced capacity has occurred).

This is a strategic concern to the MWPA and a Statement of Common Ground may be appropriate. Development within site allocations LP37.06 LP37.01 LP37.04, LP37.03 and LP37.09 is within the Consultation Area for the Algores Way Waste Management Facility and Wishbech HWRC. Development will need to ensure that at it does not prejudice the use of the ongoing use of the safeguarded sites as per Policy 16 of the MWLP. See comments in relation to LP15 Employment with regards to Use Class E.

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

These policies must include protection of existing sports facilities, improvement of existing facilities, and provision for additional facilities where needed.

LP37.01

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

Title:		Position:	
First Name:	Mark	Organisation:	Fenland District Council
Surname:	Greenwood		
Comment	Neutral		
It is the belief of members of this authority that the above site should be assessed and allocated for use for residential development as opposed to the current allocation for employment use. The extent of the site we believe should be reallocated is shown marked 1 and edged re on the attached site plan			

LP37.01

Title:		Position:	
First Name:	Thomas	Organisation:	Pegasus Group
Surname:	Kilvert		
Comment	Support		
Introduction			

For the reasons outlined below, our client Cannon Kirk (UK) wishes to support the re-inclusion of the South Wisbech strategic allocation (Policy LP37.01) in the Draft Local Plan. These representations will also provide minor suggested amendments to the specific wording of LP37.01 so that viable and deliverable schemes can be delivered within the plan period.

Cannon Kirk is the sole landowner of two parcels located within the western section of Draft Site Allocation Policy LP37.01 (South Wisbech), which lie to the west of Cromwell Road, Wisbech, between the A47 Roundabout and Tesco.

Our client is also the sole landowner of an adjoining parcel of land (6.30ha) to the south and located to the west of the A47. For reasons outlined below, these representations will also explain justifications for why Site Allocation LP37.01 should be expanded to the south to incorporate this additional parcel of land.

The Fenland Employment Needs Report (November 2021) reveals that the total area of the South Wisbech broad location is approximately 90ha, and of this, approximately 85ha remain undeveloped. More generally, the Employment Needs Report outlines some of the broad reasons why progress has been slow since the Local Plan was adopted. This includes insufficient infrastructure connectivity to service employment land; landowner issues; and viability issues caused by flood risk mitigation; and lack of demand from potential end users. Therefore, when allocating and reallocating sites for employment development, it will be important for the Council to have regard to the delivery barriers identified above.

In respect of the relevant barriers to delivering Cannon Kirk's land parcels within Site Allocation LP37.01, firstly, they remain under their sole ownership, and as such, issues of multiple ownership will be avoided.

Secondly, our client considers that there is sufficient scope and land available to retain mature trees and deliver biodiversity net gains.

Thirdly a deliverable scheme can be brought forward that provides a viable drainage solution for the site.

Fourthly, the land parcels allocated under Policy LP37.01 are directly accessible onto Cromwell Road (to the east) and the A47 (to the south-east), so there will be no issues with servicing the allocations through the existing road infrastructure.

Fifty, there is not assessed to be a shortage of demand from end users to occupy the non-residential units. This could include Class B8 uses, with the Employment Needs Report noting that past delivery and committed floorspace show continued demand for B8 uses. Nevertheless, for the reasons outlined below, Policy LP37.01 should be reworded to allow greater flexibility by including retail (Class Ea). This would enable a complementary offering to the existing retail units to the north, which could include trade centres and retail warehouses to be delivered on suitable parts of this allocation, such as the northern section of our client's site.

Our client is not in a position to comment on the wider delivery status of other parcels outside their land within the allocation. Nevertheless, South Wisbech remains a vitally important strategic 'gateway' location, which can assist in meeting the District's growing employment needs.

It should also be noted that Pegasus Group has submitted representations on behalf Gc No.27 Limited for a land parcel to the east also located within Site Allocation LP37.01. This part of the site allocation is also deliverable within the plan period, with a new employment use application due to be submitted in the short term.

LP37.01

To ensure that Site Allocation LP37.01 is fully delivered within the plan period, our client recommends slightly rewording the policy to provide greater flexibility.

Local Policy LP8 largely provides an overview of South Wisbech as a 'broad location for growth' without providing much in the way of specific details for the intended uses, other than the area will be "predominately for business purposes"... "with some potential for residential development in the eastern half." In contrast, Site Allocation LP37.01 states that development proposals should "provide a mix of employment uses, including uses within classes B and E(g))." It is important to understand the current context of the existing users that this part of the allocation adjoins.

Cromwell Road is predominantly a retail and employment location (Class E and Class B). The parcel of land to the north adjoins a mixed-use site with a Tesco Extra, a cinema, a gym and an Italian Restaurant, with storage and distribution uses (B8), warehouse retail units and trade counters (Class E) located beyond this on either side of Cromwell Road. Therefore, given that Site Allocation LP37.01 adjoins a mix of uses, the policy should be reworded to enable greater flexibility and allow the end users of the site to be tested by market demands. Given that this is a gateway site that wasn't delivered in the current plan period, there needs to be maximum flexibility to allow this allocation to come forward in the emerging plan period.

Cannon Kirk also considers that there may be some potential for residential development closest to the existing Tesco site. This could form part of a mixed-use scheme with the residential being located in the flats above other retail/employment uses.

It is also recognised that in accordance with Draft Policy LP16 (Town Centres) that a retail impact assessment test will be required for any development proposed over 500sqm of retail floorspace.

Consequently, as a result of the above it is proposed that the policy should be reworded as follows:

Provide a mix of employment uses, including uses within classes B and E, with the scope for residential development (C3), where the allocation adjoins existing residential or retail uses.

*subject to a retail impact assessment for proposed retail floorspace exceeding 500sqm in accordance with Policy LP16 (Town Centres)

In addition, as mentioned above, our client considers that there is scope to include their southern land ownership parcel within Site Allocation LP37.02. The 6.30ha land parcel is strategically located, as it fronts directly onto the Cromwell/A47 roundabout and extends along the southern A47 corridor. The additional land parcel has the scope to deliver a more comprehensive scheme, with potential retail or employment uses (B, E(a)* E(g)) to the north of this additional parcel. To the south of this unallocated parcel, there is the potential for an appropriate landscaping and planting scheme to reduce visual impacts on the landscape and assist with creating biodiversity net gains.

Consequently, as a result of the above, it is proposed that the policy should be reworded as follows:

LP37.01

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

Comment **Neutral**

In order to guarantee that Site Allocation LP37.01 is delivered within the plan period, our client suggests slightly rewording the policy to provide greater flexibility.

The strategic South Wisbech allocation is largely described in Adopted Local Policy LP8 as a "broad location for growth," but there are few specific details about the intended uses. The area is described as being "predominately for business purposes"... "with some potential for residential development in the eastern half." Site Allocation LP37.01, on the other hand, states that development proposals should "provide a mix of employment uses, including uses within classes B and E(g))."

It is important to understand the relevant context to the 'Wisbech Gateway' site (namely, the site's recent planning history, the nearby existing and proposed users and its strategic location) when justifying the need for greater flexibility in the wording of Draft Site Allocation LP37.01.

Firstly, regarding the site's recent planning history, it has been openly marketed for a wide range of uses (Class A1, A3/A5, B1 and/or B2 and/or B8 and C1) and a petrol filling station (with ancillary retail sales kiosk) since the Reserved Matters permission was approved in July 2018 (F/YR16/0798/RM). However, there has only been demand for the drive-thru, retail and petrol station units, and interest in the proposed hotel unit has not materialised. The continued inclusion of the consented hotel in the scheme made the entire project unviable, and as such, the approved scheme was not implemented. Development on this site is therefore likely to consist of a petrol filling station (with convenience store), drive thru's (Class E/Sui Generis) and storage distribution and light industrial (B2/B8 uses). In its current wording, Draft Site Allocation LP37.01 does not provide sufficient flexibility to deliver all of the previously approved and proposed new uses, which includes retail. Therefore, this parcel should have a more flexible mix of uses because of its gateway status and planning history.

Secondly, regarding the nearby existing and proposed users, Cromwell Road is predominantly a retail and employment location (Class E and Class B). The parcel of land to the north adjoins a site with extant permission for a warehouse in B1(a) and B8 use) under LPA Reference: F/YR20/0420/F. Beyond this to the north, there is a mix of uses positioned on either side of Cromwell Road, including retail warehouse units, trade counters, a supermarket, a cinema, a gym and an Italian Restaurant. This would further indicate that the 'Wisbech gateway site' could accommodate a broader mix of uses, including retail.

Thirdly, the site's location at the junction of both Cromwell Road and the A47 makes it highly accessible to all areas of the town via the local and strategic road network. Cromwell Road comprises the principal north/south arterial route into Wisbech town centre, whilst the A47 is the primary trunk road within the area, linking Wisbech with the larger settlements of Kings Lynn to the north east and Peterborough to the south west, in addition to the other major centre within Fenland, March, to the south. Consequently, this 'gateway' location is very well placed to deliver a combination of petrol filling stations and drive-thru's to serve passing traffic on the existing highway network. Furthermore, as mentioned above, following the previous consent F/YR16/0798/RM), there proved to be sufficient demand for the petrol station and convenience store.

Therefore, Draft Site Allocation LP37 should be reworded to enable greater flexibility and allow the end users of the site to be tested by market demands. Moreover, given that the 'Wisbech Gateway Site' wasn't delivered in the current plan period, there needs to be maximum flexibility to allow all of the parcels within this strategic allocation to come forward in the emerging plan period (2021 to 2041).

It is also acknowledged that a retail impact assessment test will be required for any proposed development with more than 500 square meters of retail floorspace in accordance with Draft Policy LP16 (Town Centres).

Consequently, as a result of the above, it is proposed that the policy should be reworded as follows:

LP37.01

Provide a mix of employment uses, including uses within classes B and E*, with the scope for Sui Generis uses limited to drive-thru units and petrol filling stations. *subject to a retail impact assessment for proposed retail floorspace exceeding 500sqm in accordance with Policy LP16 (Town Centres)

LP37.01

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

Comment **Support**

Pegasus Group submits these representations on behalf of Gc No.27 Limited Ltd who have land interests at South Wisbech (Local Plan LP37). Our client wishes specifically to support the re-inclusion of Draft Site Allocation LP37.01 in the Draft Local Plan. These representations will firstly explain that no significant barriers exist to restrict the delivery of our client's site (Wisbech Gateway) situated within this draft allocation during the proposed plan period (2021-2014).

This submission will then explain the benefits and the need for greater flexibility in the range of uses permitted under Draft Site Allocation LP37.01 to provide greater certainty that viable and deliverable schemes can be delivered within the plan period.

Regarding the site context, Gc No.27 Limited Ltd is the sole landowner of a roughly triangular land parcel within the western section of Draft Site Allocation Policy LP37.01 (South Wisbech). The site is located at the junction of both Cromwell Road and the A47, which makes it highly accessible to all areas of the town via the local and strategic road network and is referred to as the 'Wisbech Gateway site.' The site benefits from a Reserved Matters scheme consented in July 2018 (LPA Reference: F/YR16/0798/RM), which permitted a wide variety of uses, including offices, light industrial units, a gymnasium, a car showroom, a hotel, a petrol filling station and convenience store.

However, whilst the planning permission for this scheme has been lawfully implemented, the development has proven to be unviable, mainly due to insufficient demand for the consented hotel. Furthermore, a planning application is pending to secure access from Cromwell Road onto the 'Wisbech Gateway Site' (LPA Reference: F/YR22/0986/F).

Site Deliverability

The Fenland Employment Needs Report (November 2021) outlines some general reasons why the delivery of certain strategic allocations, such as South Wisbech, have been delayed since the current Local Plan was adopted in 2019. This includes insufficient infrastructure connectivity to service employment land; landowner issues; and viability issues caused by flood risk mitigation; and lack of demand from potential end users. Therefore, when allocating and reallocating sites for employment development, it will be important for the Council to recognise these delivery barriers identified above. In the case of South Wisbech (Policy LP8), the report reveals that 94% (85ha out of 90ha) of the site allocation remains undeveloped.

Regarding the relevant barriers to delivering Gc No.27 Limited Ltd's land parcels within Site Allocation LP37.01, firstly, they remain under their sole ownership, and as such, issues of multiple ownership will be avoided.

Secondly, our client's site (allocated within Policy LP37.01) is directly accessible onto Cromwell Road (to the west), and there is a pending application to secure this access (LPA Reference: F/YR22/0986/F). The site access was previously secured through outline applications F/YR06/0764/0 and F/YR11/0475/EXTIME, and as such, it is considered that this latest application (F/YR22/0986/F) will renew the site's approved access. The site's location at the junction of both Cromwell Road and the A47 makes it highly accessible to all areas of the town via the local and strategic road network. Cromwell Road comprises the principal north/south arterial route into Wisbech town centre, whilst the A47 is the primary trunk road within the area, linking Wisbech with the larger settlements of Kings Lynn to the north east and Peterborough to the south west, in addition to the other major centre within Fenland, March, to the south. Therefore, the 'Wisbech Gateway Site' is strategically located to benefit from the existing infrastructure connectivity to service this proposed employment site.

Thirdly a deliverable scheme can be brought forward that provides a viable and deliverable drainage solution for the site, as confirmed from the site's recent planning history.

Fourthly, the Employment Needs Report does not show a shortage of demand from end users to occupy the

LP37.01

nonresidential units. For example, for Classes B2 and B8, the Employment Needs Report notes that past delivery and committed floorspace show continued demand for these uses. Nevertheless, for the reasons outlined below, Policy LP37.01 should be reworded to allow greater flexibility by allowing roadside services such as a petrol convenience store (Class E(a)) and drive-thru (Class E(b)/ Sui Generis)) to come forward at this 'gateway location.'

Our client is unable to comment on the general status of other parcels within the allocation. Nevertheless, South Wisbech continues to be a crucial strategic location that can help the District meet its growing employment needs.

LP37.02

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 boundary, there are a number of grade II listed buildings nearby along North End, Lynn Road Peatlings Lane and Mount Pleasant Road.

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

Comment **Neutral**

LP37.02 Nene Waterfront

We support the requirement for an assessment of flood risk and surface water management, given that a significant area of the site falls within Flood Zones 2 and 3.

As this site is already an existing employment area, there are Anglian Water network assets within the site allocation boundary (see note above regarding appropriate policy wording).

LP38: March Community Regeneration

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

Comment Support

These representations are submitted by Pegasus Group on behalf of Cannon Kirk (UK) Ltd who has land interests at Isle of Ely Way, March.

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

Our client fully supports the emerging Local Plan Policy LP38 which relates to March Community Regeneration. Specifically, the broad location for the provision of open space, sports provision and leisure facilities identified on land west of March and south of the River Nene.

This presents an ideal opportunity to provide vital open space and sports provision for the residents of March. Cannon Kirk (UK) Ltd is the sole landowner for this broad location of growth and is fully committed to the provision of open space and leisure uses in compliance with this policy.

It is considered that the proposals map which identifies this broad location needs to be clearer as the black arrows at present do not fully represent the area available to provide these facilities. A shaded area encompassing the full extent of the land available would ensure that this area could be properly identified for future reference purposes.

Our client fully supports the Councils intention that “Additional employment would be particularly supported where this will contribute to the delivery of open space and recreation uses.”

This will ensure that an appropriate range of uses can be delivered which supports this open space provision such as a garden centre, retail uses or other commercial uses which could complement the existing commercial uses and allocations in the area (Local Plan Policy LP40.03).

This flexible approach will assist the Council in providing adequate employment provision in accordance with their economic strategy. The Fenland Employment Needs Report (November 2021).

sets out that the District needs to provide a 10% buffer above the area’s growth needs and needs to address the current shortfall in jobs which is equivalent to 9,600 jobs. The provision of employment uses in this location will assist with meeting these objectives.

It is acknowledged that any proposed use would need to demonstrate compliance with highways, flooding, landscape and other requirements. However, it is considered that these elements could be satisfactorily addressed due to the ongoing work and highway improvements already completed in the area such as the new access junction provided.

Summary

The Local Plan Policy LP 38 is fully supported where it relates to March Community Regeneration. However, the full extent of the broad location on the proposals map needs to be more clearly defined.

LP38: March Community Regeneration

Title:		Position:	
First Name:	Steve	Organisation:	
Surname:	Cornell		
Comment	Neutral		
March Town Centre			
Many of the improvements in March Town Centre will be reliant upon the fixed amount of government money secured. With rising costs will the money be sufficient to deliver the whole scheme or will parts of it have to be dropped?			
EV charging points			
There are no public EV charging points in March. Will this be addressed? March Town Council have said that there is no provision planned at the moment (only ducts under the market place for a future unspecified private company to use).			

Title:	Mr	Position:	Planning Manager
First Name:	Philip	Organisation:	Sport England
Surname:	Raiswell		
Comment	Neutral		
These policies must include protection of existing sports facilities, improvement of existing facilities, and provision for additional facilities where needed.			

LP38.01

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

Comment Object

Parts of this site lie within the March Conservation Area. The grade II listed March and District Museum lies adjacent to the site.

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

We welcome the reference in the policy to the Conservation Area and listed buildings as well as the need for detailed assessment.

We suggest that this assessment is undertaken now to further inform the policy wording in the Plan.

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

LP39: Site Allocations for March

Title:	Mrs	Position:
First Name:	June	Organisation:
Surname:	DIX	

Comment	Object
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Objection No. 1

The site refers to the wrong location. The correct location is Land north of Estover Road.

Objection No. 2

Proposed Housing Land north of Estover Road, 294 dwellings. A large part of the proposed allocation was considered by FDC and refused on the basis it would be detrimental to the general character and appearance of the area and contrary to Policy LP16 (d) of the Local Plan. The decision was upheld by the Secretary of State. This site still remains unsuitable for housing.

Objection No. 3

In the Sites Evidence Report it states that this site would relate to existing built development and it is misleading to indicate this allocation abuts the existing. Built form of the town and would therefore provide a suitable extension to the town. If developed it would be a major intrusion into the open countryside.

For the above reasons, this housing allocation is not suitable for future housing and should be deleted from the Local Plan.

LP39: Site Allocations for March

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

Comment	Object
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The strategic 'West March' allocation under adopted Policy LP9 of the Fenland Local Plan (2014) includes land north of Burrowmoor Road. The whole allocation indicatively provides for 2,000 dwellings. Up to 1,200 dwellings are being considered under planning application reference F/YR21/1497/O to the southern portion of this allocated area.

Draft Policy LP39 of the emerging Fenland Local Plan details the different allocations proposed across March. This includes 2,127 indicative dwellings, plus an extra 470 dwellings through planning consents which are extant. As discussed throughout this document, Parcel 7 and the land immediately surrounding it has not been included.

The land is currently allocated within the Fenland Local Plan (2019). As described in the Site Evidence Report, the Site is considered to be suitable for development along with the surrounding land, but uncertainty of the deliverability of developing the Site has caused the Council to reject the land from allocation.

The previous pages of this representation document clarify the Site's sustainability and outline how the Site can be delivered. Consequently, we object to draft Policy LP39 for not including this site and we also object to this policy for not including the land that is also proposed for deallocation.

Recommendation: To overcome the objections to draft Policy LP39, we recommend that a new row is entered into Policy LP39, similar to the details described below:

SITE ALLOCATION: LP39.01(a);

SHELAA: 40007 - Parcel 7;

Dwellings: 70; and

Area (Ha): 2

Title:	Mr	Position:	
First Name:	Gerard	Organisation:	Smith Family
Surname:	Smith		

Comment	Neutral
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Site 40485 March

We intend to have a planning application submitted in the near future, for the development of our landholding. As agreed with Persimmon, they will grant access to the land as part of Phase 1 of their development

LP39: Site Allocations for March

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

Comment	Object
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Policy LP39: Site Allocations for March	
OBJECT	

Policy LP39 identifies the proposed residential allocations for March and provides a list of housing commitments. Foster Property Developments has an interest in land off Wimblington Road in March (Ref. 40257), and requests that this site is also allocated in draft FLP for approximately 60 to 70 dwellings. It is noted that the adjacent land to the north and south of the site is identified for proposed allocations in draft FLP. 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 and on the character of the countryside. 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 March.

Additional Allocation at land off Wimblington Road in March (Ref. 40257)

The land off Wimblington Road in March (Ref. 40257) 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, 56% of the site is located within Flood Zone 3. In addition, development of site would adversely impact on the morphology of the town and the open character of the countryside in this location”.

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. As explained in the call for sites submission, the dwellings at the promoted development would not be located on land within Flood Zone 3 in order to avoid the risk of flooding. It is recommended in the Flood Risk Note that finished floor levels for the promoted development should be raised to avoid flood risk impacts. The decision to grant planning permission and allocate sites in March on land partly within Flood Zones 2 and 3 demonstrates that it is possible to successfully mitigate the impacts of flood risk in this location, through a detailed assessment and planning conditions. It is requested that the land off Wimblington Road in March is reassessed in more detail, taking into account that dwellings would not be located Flood Zone 3, and in order to determine whether flood risk constraints could be addressed by mitigation measures.

It is noted that there are numerous proposed allocations for residential and employment uses in draft FLP located in the southern part of March and to the west of Wimblington Road – see for example residential allocation Refs. LP39.03, LP39.04, LP39.07 and LP39.10, and employment allocation Refs. LP40.02 and LP40.03. In due course the land promoted by Foster Property Developments at land off Wimblington Road would have residential development located to the north and south once those developments have been delivered. The assessment of the site does not take into account the fact that the neighbouring land is identified for allocation, and the surrounding countryside and the character of the area would be changed by those allocations. The adjacent proposed allocations off Wimblington Road include policy requirements relating to the retention of existing trees and hedges and for additional landscaping to address visual impacts. The promoted development would seek to retain the existing vegetation at the site boundary and include additional landscaping within and on the edge of the site. It is requested that the promoted development at land off Wimblington Road could be brought forward as part of a comprehensive development in conjunction with the neighbouring allocations. Foster Property Developments are in discussion with the neighbouring landowners about a comprehensive development including all of the land in this location and are working towards a landowner’s agreement. The site should not be retained as an isolated parcel of agricultural land surrounded by built development. It is considered that the comments in the site assessment about the impact on the morphology of the town and the open character of the countryside are not correct. It is requested that these comments are deleted from the site assessment.

LP39: Site Allocations for March

In addition, the promoted development at land off Wimblington Road could deliver a more suitable vehicular access onto Wimblington Road for the neighbouring residential allocations at LP39.03 and LP39.10. The promoted development could also contribute towards the delivery of improvements to pedestrian and cycle routes along Wimblington Road.

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 off Wimblington Road in March (Ref. 40257) is allocated in draft FLP for residential development, with the following matters specified in the site-specific allocation:

- Number of Dwellings: 60 to 70 dwellings including affordable
- Site Area: 2.3 Ha
- Development should include:
 - oan assessment of flood risk
 - oan suitable vehicular access and footway and cycleway connections
 - oWhere possible retain existing hedgerows
 - oprovide landscaping and planting at the western boundary to reduce visual impacts

Title:	Ms	Position:	Chartered Town Planner
First Name:	Shanna	Organisation:	Swann Edwards Architecture Limited
Surname:	Jackson		
Comment	Neutral		
land submission 40234			

The site is located on the edge of March which is a Primary Market Town where currently the majority of the Districts growth is apportioned. The site constitutes previously developed land where there is a presumption in favour of redevelopment.

There are no technical constraints which would restrict the use of the land for residential purpose and it is therefore submitted that the use of the site as a residential allocation is appropriate. For the reasons given above the land should be allocated.

LP39: Site Allocations for March

Title:

Position:

Graduate Planner

First Name:

George

Organisation:

Allison Homes Limited

Surname:

Wilkinson

Comment

Object

March Phase 2 Site Representation NEW SITE

As an extension of the March site currently in planning, Allison Homes proposes a future site for residential development. This site, although unallocated, offers a logical extension that doesn’t intrude into the countryside any further than the draft allocation off Upwell Road, and will offer connections through to the existing footpath that runs along the western boundary. The site will allow for circa 100 dwellings and will include appropriate landscaping and open space provision to be policy compliant.

The site does not span any further eastwards than the allocated site on Upwell Road to the north and is well contained by Barkers Lane to the south. Despite this, the site is located outside the settlement boundary of March in the Emerging Local Plan’s policy map, however, we believe that the site should be included in the settlement boundary, given that there would be limited negative impact and intrusion into the ‘open countryside’.

Both phases slope to the south and although part of the extension site is located in flood zone 2 and 3, suitable drainage design will ensure minimal flood impacts, which will include SUDs ponds to the south of the site.

Title:

Mr

Position:

First Name:

Colum

Organisation:

Cambridgeshire County Council

Surname:

Fitzsimons

Comment

Neutral

Site allocation LP39.29 falls within the Consultation Area for Whitemoore Rail Sidings Transport Infrastructure Area (TA). Development will need to ensure that at it does not prejudice the use of the port as per Policy 16 of the MWLP.

Site allocation LP39.06 is within the Consultation Area for the March Anaerobic Digestion (AD) Plant (Westry) WMA. Development will need to ensure that at it does not prejudice the ongoing use of the safeguarded sites as per Policy 16 of the MWLP.

Title:

Mr

Position:

First Name:

Colum

Organisation:

Cambridgeshire County Council

Surname:

Fitzsimons

Comment

Object

The scale of housing proposed in March and the surrounding villages will require additional secondary school places. There will also be demand for an additional 2 form of entry primary school in addition to the school being provided as part of the March West development. Neale Wade Community College is on a restricted site and cannot be expanded further. The adopted Local Plan (2014) included provision for the expansion of Neale Wade as part of the adjacent Southeast March strategic allocation. The deletion of the strategic allocation removes the opportunity to deliver the expansion of Neale Wade and creates uncertainty around the provision of primary and secondary school places needed within the town.

LP39: Site Allocations for March

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

Comment	Object
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We object to the omission from the residential allocations for March of the land immediately south of LP39.05 (See Plan). In the same way the LP39.5 is a logical extension of the town, given the progress with an application, this is additional land also is a logical further phase of such an extension. The Landowners are working with Allison Homes and seeking to deliver this area as a natural progression of development in this area. Approximately 70% of the site (norther part) is within flood zone 1 and it is envisaged that housing would be located in this northern part with the balance of land accommodation open space, SUDs attenuation, land scaping, and providing linkage to Barkers Lane for pedestrians and recreational purposes.

We would urge the Council to consider allocation of this area alongside LP39.05 accepting that this area would be a phase 2 to the proposed allocation scheme and likely to be developed in years 5-10 of the plan period.

Title:		Position:	
First Name:	Caroline	Organisation:	
Surname:	Long		

Comment	Object
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The proposed draft local plan has changed the site status to deallocated.

The reasons we think that this should be reconsidered are as follows.

1. In association with neighbouring land owners, the site will be subject to a hybrid planning application before the end of 2022.
2. We have previously been advised against pursuing independent applications for parts of the site (ref 19/0172/PREAPP) which we believe would have been in line with the councils strategic housing requirements. Should March East be deallocated, we should be given the opportunity to pursue smaller development pockets of housing on the land.
3. We disagree with the statement that smaller development pockets would adversely impact the character of the area. Barkers Lane and Wimblington Road both have multiple examples of “infill developments” of no particular discernible character. The Barkers Lane building line would suit further development and be attractive to homeowners due to its proximity to the Neale Wade School.
4. Concerns over access would be minimised with smaller developments and access via Barkers Lane is achievable.

LP39: Site Allocations for March

Title:	Mrs	Position:
First Name:	Myrtle	Organisation:
Surname:	Penrose	

Comment	Object
<p>1. Firstly this site refers to an incorrect No site. It should be Land north of Estover Road. Very disappointed incorrect information has been provided.</p> <p>2. Most of this proposed allocation was turned down for development about 4 years ago by Fenland and then the Secretary of State as it would be detrimental to the general character and appearance of the area. This would therefore be contrary to Policy LP16 (d) of the Local Plan. Nothing has changed on this site and any development would be a major intrusion into the open countryside.</p> <p>3. The Site Evidence Report relating to this site is incorrect and misleading. The report states that this allocation abuts the existing built form of the town and would therefore provide a suitable extension to the town. There is no building there except for a playing field which consists of 1 pavilion.</p> <p>In my opinion this housing allocation is not suitable for future housing and should be deleted from the Local Plan.</p>	

LP39: Site Allocations for March

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

Comment	Object
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Site Allocation LP39.01 Land north of Knight's End Road and East of the A141

Persimmon Homes question why adopted policy LP9 March and West March (strategic allocation) for around 2000 new dwellings in the 2014 Local Plan for West March has not been carried over as part of the review of the Local Plan.

A Broad Concept Plan produced by Persimmon Homes was approved by Fenland District Council for the site in July 2021 (a copy is enclosed). Following the approval of this document Persimmon Homes submitted an outline planning application for up to 1,200 dwellings which is currently pending consideration (planning reference F/YR21/1497/O. Following the approval of the Broad Concept Plan, three further planning applications have been submitted for land which in 2014 were included in the allocation but have been removed from the allocation in the 2022 Review Plan.

F/YR21/1175/F, Land East of York Lodge, Gaul Road, Erection of 65 Dwellings
F/YR22/0510/O, Land West of Knights End Road, Erection of 36 Dwellings
F/YR22/1032/O, Land West of Princess Avenue, Erect up to 126 Dwellings

It is clear that following the approval of the Broad Concept Plan that there is interest from other land owners in developing their sites. For this reason, Persimmon Homes are of the view that the whole site allocation from the 2014 Local Plan should be carried through as part of this review. One clear advantage from this approach is that infrastructure provision can be considered proportionately across the whole site, with all sites being considered against the same criteria, otherwise the parcels of development omitted from the allocation are at risk of coming forward in isolation/ disjointed fashion.

In the event that the site allocation does not revert back to the 2014 allocation, Persimmon Homes would wish to see site allocation LP39.1 be amended to reflect the current outline planning application boundary which has been submitted for up to 1,200 dwellings (reference F/YR21/1497/O). The site area specified in the policy table and red line identified on the March Inset Plan do not accurately show the full extent of our site. Our site has an area of 52.42ha which includes an additional parcel of land to its north east extent (to the west of Causeway Close Play Area). Consequently, the site area needs to be increased from 50.56 ha to 52.42ha in the policy and the red line amended accordingly on the March Inset Plan to include the full extent of the site as submitted under F/YR21/1497/O.

An extract of the March Inset Plan and the location plan submitted with outline planning application F/YR21/1497/O can be seen below. A copy of the location plan submitted with F/YR21/1497/O is also appended to these comments.

(See attachment LP39 for above plans)

LP39: Site Allocations for March

Title:		Position:	
First Name:	David	Organisation:	The Planning Partnership
Surname:	Mead		

Comment Object

We are objecting to Policy LP39 as it fails to allocated land for residential development to the north of Burrowmoor Road, March as identified on the attached plan. The land is currently allocated for residential development in the adopted local plan and the March Neighbourhood Plan. The owners of the site through their agents are currently working on the details for the submission of a planning application with a delivery partner. In addition the owners contributed fully with regard to the preparation, consultation and adoption of the Broad Concept Plan. This shows commitment to the delivery of the site for residential development. The BCP was adopted in the summer of 2021, just over 12 months ago, this is not considered to be an excessive amount of time, particularly when the adopted local plan is only 8 years old with a further 12 years to go.

LP39: Site Allocations for March

Title:		Position:	Associate
First Name:	Gabrielle	Organisation:	Pegasus Group
Surname:	Rowan		

Comment	Object
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1.1. These representations are submitted by Pegasus Group on behalf of Barratt David Wilson (BDW) Cambridgeshire who has land interests at South-East March (Adopted Local Plan Policy LP9).

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

1.3. BDW is the nation's leading housebuilder with a vision to lead the future of housebuilding by putting local communities and sustainability at the heart of everything they do. Their aim is to create great places by building long-term relationships to deliver high-quality developments where people aspire to live, designing developments which look great, are a pleasure to live on and will enhance local communities for years to come. They have a successful track record of delivering residential schemes in Fenland District.

2. ISSUES & VISIONS

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

2.2. The vision states that growth will be focused on the four market towns and these will be attractive and prosperous places to live. This is fully supported. However, it is considered that the level of housing development proposed for March in the draft Local Plan will not be adequate to meet the needs of future generations and may not meet this vision of the Plan as an opportunity will be missed to provide significant development in a most sustainable location in the District.

2.3. As set out in the National Planning Policy Framework (Chapter 2), achieving sustainable development is key and has three overarching objectives: economic, social and environmental and that planning policies and decisions should play an active role in guiding development towards sustainable solutions. A social objective of the Framework ensures that a sufficient number and range of homes can be provided to meet the needs of present and future generations.

3. HOUSING NEED & REQUIREMENT

3.1. The Plan in Section 5 sets out the housing need and requirement for the District from 2021 to 2040 (the plan period) which results in 10,525 dwellings. This is derived from a combination of the Local Housing Need (LHN) before 2022 and after 2022 which ranges from 517 dwellings per year to 556 dwellings per year. The draft Local Plan states that the LHN figure is likely to change over the plan period and it is the LPA's intention to accommodate the LHN in full.

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

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

3.4. In total, it is identified that March will provide approximately 2,182 dwellings in new allocations as set out in draft Local Plan Policy 38 and 39. The total number of site allocations in March are 14.

3.5. When compared with the current Adopted Local Plan (2014), the total housing requirement was 11,000 (550 per annum) as set out in adopted Local Plan Policy LP4. This is a similar housing requirement to the draft Local Plan. However, the housing requirements in March vary drastically from the adopted Plan to the emerging Plan. The

LP39: Site Allocations for March

Adopted Local Plan identified 4,200 houses in March whereas the emerging Local Plan is nearly half that figure at 2,182. There is no explanation or clarification as to why this housing figure has been drastically reduced. March is still identified as one of the four main market towns in the District and the vision of the Plan remains the same in terms of providing sustainable development to provide attractive and prosperous places to live. However, the level of growth now identified for March will be half of that previously identified.

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

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

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

4. SOUTH EAST MARCH ALLOCATION (ADOPTED POLICY LP9)

4.1. The Adopted Local Plan is the Development Plan for the District and the allocations identified within the Plan are valid. It is our client's intention to submit an outline planning application for South East March (Adopted Local Plan Policy LP9) shortly in compliance with the Adopted Local Plan.

4.2. This allocation (LP9) relates to 600 houses in South East March. The allocation states that: "it is expected to be predominantly residential (around 600 dwellings). It will include provision for new sports pitches for Neale Wade Academy, if required. Direct cycle and pedestrian routes should be provided to the Academy. Some fairly significant surface water attenuation features to mitigate local flood risk are likely to be necessary. The design of the development, including enhanced landscaping, will be particularly important at the southern end of the area."

4.3. The site is included within the current housing trajectory for the District and as such, the Council is reliant on to meet their housing land supply, which currently is 6.69 years. The site is identified to start delivering 66 houses a year from 2024/1. By removing this allocation from the emerging Local Plan this will have significant implications to the Council's ability to meet their housing requirements. It is unlikely that any newly identified allocated sites in the emerging Local Plan will be able to assist with the Council's short term housing requirement given timescales required for bringing forward sites post-allocation. Whereas, this site will be able to start delivering in the first phase of the Local Plan period.

4.4. BDW is the majority developer for this site and their intentions are to deliver a sustainable residential development which complies with relevant national and local planning policies. They control the land on the western boundary in order to deliver two vehicular accesses via an upgraded access from Lambs Hill Drive and off Wimblington Road .

4.5. BDW has produced a development framework plan and vision document for the whole site which demonstrates how the comprehensive development can be delivered. A copy of the Vision Document, Development Framework Plan and Highways Assessment is submitted with these representations.

4.6. This development framework plan will not prohibit any other parcels, not within BDW's control, from being developed separately. The plan shows the configuration of the residential development, public open space, sports facilities, access points and drainage measures.

4.7. A pre-application request has been submitted to the LPA in September 2022 in order to discuss the merits of this development framework plan and the next stages towards the preparation of an outline planning application (LPA ref: 22/0098/PREAPP). This demonstrates how BDW is progressing this site towards a planning application.

4.8. A development on the site at South-East March presents an opportunity to provide a sustainable, landscape-led

LP39: Site Allocations for March

urban extension to March, on land allocated for residential development within the adopted Fenland Local Plan.

4.9. Taking inspiration from its surroundings, development will provide a pleasant place to live, while recognising new approaches to urban design and masterplanning. There will be:

- A highly connected network of attractive streets and spaces;
- Verdant tree lined streets;
- New formal parks and play areas;
- Open natural green spaces;
- Formal outdoor sports space;
- Houses of all sizes to meet a range of needs; and
- Architecture and design that signals takes inspiration from the existing local character of March.

4.10. It is envisaged that the substantial provision of multi-functional public open space at the development settings will allow for an attractive backdrop for the new homes, facilitating sustainable alternative modes of movement and enhanced pedestrian and cycle permeability.

4.11. The Site is allocated within the March Neighbourhood Plan area. The Plan is supportive of the South East March allocation of up to 600 dwellings under adopted Policy H1.

5. SUMMARY

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

5.2. The documents submitted with this representation, the Vision Document, Development Framework Plan and Highways Assessment demonstrates the level of work already undertaken to deliver this site and shows how the site can be developed in accordance with the adopted Local Plan policy.

5.3. The South East March allocation (Adopted Local Plan Policy LP9) should be included in its entirety in the emerging Local Plan Policy LP39, listed with the other March allocations as follows:

LP39.14 – South East March – 600 dwellings

5.4. Accordingly, Local Plan Policy LP2 should be amended to include the additional 600 dwellings to be delivered at March, bringing the total housing provision in March to 2,782 dwellings.

LP39: Site Allocations for March

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

Comment Object

Land at Bearts Farm, East Street, Manea. SHEELA Ref: 40304
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.

Manea is identified as a larger village in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. Furthermore, it is located in the south of the district making development more viable with a realistic proposition of delivering both market and affordable housing. Six sites are proposed for housing allocation in Manea under Policy LP49, although they are generally smaller scale sites. However, currently there are only two new allocated sites one for 105 dwellings and a second for 10 dwellings. It is therefore considered that as a larger village Manea could accommodate further allocations.

LP39: Site Allocations for March

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

Comment **Neutral**

Land at Kingswood Park, March. SHEELA Ref: 40314

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.

March is identified as a Market Town in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. Furthermore, it is located in the south of the district making development more viable with a realistic proposition of delivering both market and affordable housing. Not only are market towns a focus for housing development but also a focus for infrastructure investment. It is therefore considered that as a largest Market Town at the top of the settlement hierarchy, March accommodate as many allocations as possible.

It is noted that the site assessment made the following commentary and it is assumed that this is the basis for not including the site as an allocation:

A relatively flat, greenfield site to the south west of March Town Centre in Flood Zone 1, measuring approximately 8.68 hectares. The site is in a residential area, and identified as Grade 2 and 3 land, with existing access off Kingswood Road. However, the existing access falls slightly short of the site entrance, meaning that existing road would require a minor extension. (emphasis added)

The site has no significant constraints, (emphasis added) located in a Market Town, and well serviced by local facilities. Burrowmoor Primary School is located approximately 0.75 kilometres north west of the site, with a Pupil Admission Number (PAN) of 60. Additionally, the Neale Wade Academy is located approximately 0.88 kilometres to the south east, with a PAN of 300.

In respect of Site access, whilst a detailed technical access assessment has yet to be completed, Kingswood Road has an approximately 5.5m wide carriageway with footways and verges on both sides,

albeit closer to the Site the footway on the eastern side stops short. However, there does not appear to be any obvious physical constraint which would mean that a suitable access could not be provided. The above site assessment, confirmed there were no significant constraints and just noted that the existing road would need some minor extension. This is a matter which could easily be included as a policy requirement.

It is noted that based on the site assessment density calculation applied at the time, it was assumed at a site area of 8.68ha, the Site could deliver in the region of 260 dwellings. However, if the density calculation used in the SHELAA methodology is applied, as the site exceeds 5ha a net developable area of 65% is suggested as reasonable. If this is then multiplied by a density of 33 dpa, it would suggest the Site might only deliver in the region of 186 dwellings. This is considered to be a more realistic figure.

In respect of the original concerns around highway access, it may have been the case that at 260 dwellings the highway authority considered that two points of access should be provided, or a wider carriageway width was necessary. These requirements are normally triggered by developments in excess of 200 units. If the number of dwellings is reduced then a single point of access is more likely to be acceptable. Accordingly, it is considered that the Site should be included as an allocation, however, the number of dwellings to be delivered should be reduced. In addition, the policy should require a full transport assessment to demonstrate the adequacy of the site access arrangements.

LP39: Site Allocations for March

It is therefore suggested that Policy LP39 should be amended to include the following:

Development should provide:

Suitable vehicular access and footway connections shall be provided to Kingswood Road, and a transport assessment shall be provided to demonstrate safe highway access will be delivered;

Archaeological investigation and mitigation, where required;

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

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 be considered 'sound' at examination.

March is the largest Market Town and at the top of the settlement hierarchy. It is also in the more viable south of the district and as such able to deliver both market and affordable housing. Accordingly every opportunity to include suitable allocations should be taken.

The Site scored B 'potentially suitable' in the SHELAA report. It was part of the West March Strategic Allocation identified in the adopted Local Plan (2014) (the site 40007). Adjoining sites LP39.01 and LP39.15 that have been identified as allocations. The SHELAA site assessment confirmed that the site had no significant constraints. Access can be provided from Kingswood Road for the more realistic number of dwellings proposed (186). A full transport assessment can be a policy requirement.

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 LP39 should be amended to include this site as a new additional allocation.

LP39: Site Allocations for March

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LP39: Site Allocations for March

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

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

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

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

Comment	Object
Richborough’s site ‘Land west of Princess Avenue, March’ is allocated as part of Policy LP9 –West March in the adopted Fenland Local Plan (2014). In conformity with that allocation, an outline planning application has been submitted. This will serve to drive the delivery of much needed housing in March, including in protecting the deliverability of ‘Land west of Princess Avenue, March’. Indeed, with the live outline application reflecting the adopted allocation, there is no planning reason why Richborough’s site should not be brought forward into the emerging Plan.	
The emerging Policy does not provide justification for why this site has been removed from the wider allocation of the land and fails to account for the ongoing outline planning application which itself inherently demonstrates the deliverability of the site and its enduring suitability to function as a part of the wider allocation.	

LP39: Site Allocations for March

Title:

Position:

First Name:

Organisation:

Surname: Fisher Parkinson Trust

Comment

Support

Background

Representations regarding the site identified in red on the attached plan under the Fenland District Council's Site ID Reference 40382 (Doc 1), and relates to land owned by the Fisher Parkinson Trust. The site extends to some 15.66 ha and is situated South of Knight's End Road and West of Wimblington Road, March. The site benefits from having the most substantial road frontage to Wimblington Road.

The site hugs the built-up area with plenty of visually well-contained mature landscape features. This is a prime allocation for new housing development within a sustainable location that is supported by planning policy.

Housing Allocations

- 2013 'Broad Locations for Growth'
- March Neighbourhood Plan (March South West - around 500 dwellings).
- Identified as Residential (LP39) on Draft Policies Map (August 2022) March (Inset 16)
- Draft policies LP39.03 and 39.04 specifically to the Trust's land*

Promotion through the Local Plan process

Since 2012, the Fisher Parkinson Trust has promoted the site for housing development. This has involved regular meetings over a number of years with the relevant landowners.

Throughout this process, the Trustees furnished the Council with all relevant information and representations as part of the emerging Local Plan process.

There are significant costs for promotion which cannot be justified without the achievement of a formal allocation being the end goal. Scope exists for the Trust to work with other landowners and as a consequence, supports Policies LP39.07 and 39.10. The site continues to attract serious interest from major house builders.

Conclusions

The scale of the proposed housing is substantial, with the result that deliverability is unlikely to be constrained by major infrastructure obligations.

This site is available and deliverable for housing development.

* Extract from "Fenland Local Plan 2021- 2040. Draft Local Plan Consultation August 2022'

LP39: Site Allocations for March

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

Comment Object

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

There are clear benefits in replicating the 2014 site allocation boundary including, most importantly development being in accordance with the approved Broad Concept Plan and each site providing a proportionate amount of infrastructure required from a strategic allocation. Persimmon Homes are of the view that the allocation should be increased in size and replicate that in the 2014 Plan.

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

LP39: Site Allocations for March

Title:		Position:	Associate - Planning
First Name:	Lydia	Organisation:	Brown & Co Barfords
Surname:	Pravin		
Comment	Object		
New Site			

This Planning Statement has been prepared by Brown & Co to support promotion of the Land adjacent Elm Road, March, PE15 8PP for residential led development as an extension to March

March is Fenland's largest town by population (22,220 persons at mid-2018) and has a railway station situated on the Stansted -Cambridge-Leicester-Birmingham line. There are a range of services and facilities in March with Network Rail's supply and infrastructure depot and supports a variety of rail-based jobs in freight, logistic and recycling.

The site is located to the north of March, adjacent to Elm Road (B1101) and comprises of agricultural land encompassing approximately 18.96 hectares. There is a footpath and street lighting along the western edge of Elm Road with a vehicular access at the north-eastern end. To the north there is commercial development accessed off Longhill Road and playing fields which is bound by Elm Road to the east and Longhill Road to the north. The playing fields are home to March Town United Youth Football Club and March Bears Rugby Club with a short row of trees between the site, further north-east of the site is Whitemoor Prison.

Along the south-eastern edge of the site is the railway line with houses along Elm Road and houses on both sides commencing at 164 Elm Road along with in depth housing development also on the eastern side with access off Berryfield. To the immediate south is a waterway (Three Corner Cut) and the railway line lies adjacent to the east along with a commercial development (B8 storage and distribution) along Marwick Road. There is housing further south-east (Dagless Way) and to the west is the old railway line which is home to Network Rail's supply and infrastructure depot bound by Hundred Road further east. The site is approx. 1.5 miles from the centre of March (30 minute walk) and lies in Flood Zone 1. To the west of the site is March Whitemoor Marshalling Yard Water Tower which is Grade II listed although the site is not within the setting of any Conservation Area.

The site is promoted for residential led development as an extension to March with two points of access, a community hub, amenity land and landscaping, and is considered should be allocated in the Fenland Local Plan 2021-2040.

Planning History

North end of the site:

- F/0766/89/F – Land to the West of B1101 Elm Road, March – Formation of vehicular access – granted Mon 31 July 1989

- F/96/0943/F – Land South West of Braza Sports Field, Elm Road, March - Change of use of agricultural land to additional sports field – granted 30 September 1997 – this has not been implemented

Land directly west:

- F/Y03/0356/SCO – Whitemoor Sidings Hundred Road, March - Proposed Aggregate Depot – Further details not required Thu 17 April 2003
- F/YR03/2007/CCC – Former Whitemoor Marshalling Yard, Hundred Road, March – Strategic supply facility for use in maintenance and renewal of rail infrastructure, including aggregate storage and rail ballast recycling, associated sidings, offices and other ancillary development – Deemed Consent (CCC) – Thu 27 Nov 2003
- F/YR07/2001/CCC – Former Whitemoor Marshalling Yard, Hundred Road, March – Variation of condition 50 of LPA Ref F/2007/03/CM to vary the timescale for the submission and implementation of a scheme for sealing the internal haul road between the site access and the spent ballast storage/ recycling area from 27 November 2006 to 27

LP39: Site Allocations for March

November 2008 – Deemed consent CCC – Tue 22 May 2007

Vision for site

The Fenland Local Plan 2021-2040 Draft Local Plan Consultation August 2022 (DLP) has been issued for public consultation which sets out the draft proposed policies and specific allocations for new development. This section sets out comments on DLP and the vision for the site. It is also important to consider the National Planning Policy Framework 2021 (NPPF) which sets out the Government's planning policies for England and how these should be applied.

The NPPF 2021 provides a framework within which locally-prepared plans for housing and other development can be provided. Paragraph 2 of the NPPF 2021 sets out the NPPF 2021 must be taken into account in preparing the development plan and paragraph 7 of the NPPF 2021 sets out the purposes of the planning system is to contribute to the achievement of sustainable development.

Paragraph 8 of the NPPF 2021 sets out achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to contribute to protecting and enhancing our natural, built, and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Within paragraph 9 of the NPPF 2021 it sets out the above objectives should be delivered through the preparation and implementation of plans and the application of policies in the Framework.

Paragraph 10 of the NPPF 2021 sets out sustainable development should be pursued in a positive way, at the heart of the Framework and the presumption in favour of sustainable development in paragraph 11 sets out:
"Plans and decision should apply a presumption in favour of sustainable development.

For plan-making this means that as set out in a) all plans should promote a sustainable pattern of development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.

In terms of Examining plans paragraph 35 of the NPPF 2021 sets out:

- "Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements; and whether they are sound. Plans are 'sound' if they are:
- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) Justified – an appropriate strategy, taking into account the reasonable alternative, and based on proportionate evidence;
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

LP39: Site Allocations for March

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

The Fenland Local Plan 2021-2040 Draft Local Plan Consultation August 2022 sets out the overarching issues facing the District on page 16 and allocating the site for residential led development will enable market and affordable housing with affordable housing, a key issue within the District.

In Section 3 the vision is set out for the district over the period to 2040 which sets out “By 2040 all settlements, big and small, will be attractive and prosperous places to live, set within our unique and protected Fens landscape. They will benefit from economic growth and inward investment. The vision goes onto set out “Growth will be focused on our four market towns” along with setting out “Growth in homes and jobs will be closely linked, with new infrastructure... and open space provision planned and provided at the same time as new buildings.” which is supported.

In paragraph 6.11 of Section 6 – The Settlement Hierarchy and the Countryside, the Draft Local Plan reintroduces settlement boundaries which are shown on the Policies Map. Paragraph 6.12 sets out:

The primary purposes of settlement boundaries, and the policies which apply within and outside them, is to carefully manage new development in the countryside thereby balancing the need for housing and employment growth with conserving its intrinsic character and beauty; to maintain the essential character of each settlement; and to manage the growth within and outside each settlement in accordance with the settlement hierarchy in Policy LP1. Policy LP18 (Development in the Countryside) sets out further criteria for considering development in the countryside. All other residential development not in accordance with Policies LP1 and LP18 will, by definition, be contrary to the vision, objectives, development strategy and policies of this Local Plan.

Within Policy LP1 of the Draft Local Plan Part A sets out a Settlement Hierarchy with decisions on investment in services and facilities and on the location and scale of new development taken on the basis of a settlement hierarchy with March being identified as a market town. It is agreed that March should be considered as a Market Town. Part B of policy LP1 identifies settlement boundaries and sets out that the boundary for each settlement is identified on the Policies Map. A proposal within the settlement boundary will be supported in principle. Land outside the settlement boundaries defined as countryside. Paragraph 7.5 of the Draft Local Plan sets out in formulating the strategy for growth, particular regard has been given to deliverability and viability issues present in the district and agreed that the spatial strategy should direct growth principally to the market towns with March identified as a market town which is again supported. Given this position it is considered further residential led development is required.

The Draft Policies Map (August 2022) March (Inset 16) shows a settlement boundary (LP1) which considers the site to be outside the settlement boundary and in the countryside in planning policy terms as shown in Figure 1 on the next page (the red star shows the site’s broad location) which is also shown on the Location Plan – drawing number 22.037.L0101_A.

The settlement boundary shown in Figure 1 encompasses the houses along Elm Road and to the north the commercial development and Whitemoor Prison (existing) are shown as an Established Employment Area, Ref EEA7 HMP Whitemoor area, March which includes HMP Whitemoor prison (C2a) and industrial units (B2 and B8 use) under policy LP15. There is also the existing playing fields to the north which are home to March Town United Youth Football Club and March Bears Rugby Club with the site bound to the east by Elm Road. There is existing commercial development to the south which is proposed as LP40.07, March Cold Stores Limited 20-24 Marwick Road for B8 Storage and Distribution and encompasses 3 hectares, this site has extant planning permission and is proposed for allocation. There is currently housing further south-east (Dagless Way) and to the west is the old railway line which is home to Network Rail’s supply and infrastructure depot bound by Hundred Road further east.

Given the unique position and context of the site it is considered the site would represent an infill development with existing employment in close proximity (to the north and south, outside the site). The Development Framework Plan shows the residential led vision for the site with landscaping as well as two points of access provided from Elm Road which already has a footpath and streetlights. The site is well located and is also only 1.5 miles from the centre of March (approx. 30 minute walk). A community hub is proposed which is very broadly defined and could comprise a

LP39: Site Allocations for March

village hall serving multiple purposes and some retail space which will enable residents some services and facilities on site, as required, without undermining the role of March's town centre and the community hub area can be flexible in size. The Development Framework Plan shows provision of amenity space towards the north and south-eastern ends and overall, the vision for the site aligns with the vision for Fenland set out in section 3 of the DLP.

Paragraph 73 of the NPPF 2021 the supply of large numbers of new homes can often be best achieved through planning for larger scale development such as significant extensions to existing towns provided they are well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes) highlighted through the Road and Connection Strategy – drawing number 22.037.SK001_B. Strategic policy-making authorities should identify suitable locations for such development where this can help meet identified needs in a sustainable way.

Given the site is well located it is considered the site should be within the settlement boundary and allocated for residential led development as it is deliverable, achievable, and available. To the west of the site is March Whitemoor Marshalling Yard Water Tower which is Grade II listed. It is important to note there is existing planting on the western boundary and this is read within the context of the commercial development and wind turbines. The proposed Development Framework Plan and Development Land Strategy shows how the development provides landscaping and will provide significant economic, social, and environmental benefits in accordance with paragraph 8 of the NPPF 2021. Therefore, it is considered omitting the site from the settlement boundary is not justified as set out in paragraph 35 of the NPPF 2021.

Summary

It is considered placing the site outside the settlement boundary is not justified in accordance with paragraph 35 of the NPPF 2021 given the unique position and context of the site. The Development Framework Plan shows how allocating the site for residential led development will enable sustainable development and that the site is deliverable, available, and achievable as set out in the NPPF 2021.

The proposed development will enable economic, social, and environmental gains. In terms of benefits, the proposal would make a positive contribution to the supply of housing in the area. The construction of the development would provide significant economic benefits for the duration of the build and the new residents would contribute the vitality of the local community and support local service provision. The Development Framework Plan shows residential development which can include a range of homes including affordable housing to meet the needs of future generations with existing footpath and street lighting. It is considered the proposal contributes positively to the character of the area, landscape and heritage assets with amenity space, and ensures the development represents sustainable development as set out in paragraph 8 of the NPPF 2021.

LP39.01

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

Comment **Object**

This is a very large site for 1200 dwellings. Whilst there are no designated heritage assets within the site boundary, one of the access points lies immediately adjacent to the grade II listed Hatchwoods, a late eighteenth century gault brick house.

The grade I listed Church of St Wendreda lies to the east of the site, together with a cluster of other grade II listed buildings and structures.

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

We appreciate that there is mention of the church and the cluster of listed buildings in Policy 41 which also relates to this site. There is no mention of Hatchwoods though.

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

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

Comment **Neutral**

LP39.01 (1,200 dwellings) Land north of Knight's End Road - Policy LP41.

We suggest that developers undertake early engagement with Anglian Water to assess connection requirements and future investment that may be required. As a strategic site we would support a green infrastructure led approach to embed recommendations from the WCS such as integrated water management and biodiversity net gain to provide a sustainable and resilient community for future residents.

We support the need for a concept plan given the quantum of growth and the largest strategic site allocation in the district. We would suggest a masterplan is developed in consultation with key stakeholders and we would welcome engagement in this process.

LP39.01

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

Comment Object

The plan of the proposed allocation of the west March area does not reflect the land under Persimmons option or the extent of the application submitted in respect of the open space area in the North West Corner. The plan requires updating to include this additional area.

Given this allocation is part of the wider West March area and it is intended to expand eastwards in due course it is essential that Policy LP41 include as part of its criteria that suitable arrangements should be included to enable access and service provision to the land east of the allocation, to enable proper development of that area in due course. These should include such access and services being constructed to the allocation site boundary and of a scale and capacity to facilitate further development in due course. There are no such provisions currently within LP41 and the policy wording should be amended to enable the approved ,masterplan for the whole area to be implemented, and development of adjoining land not sterilized by lack of future proofing.

LP39.02

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

Comment	Object
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Land North of Estover Road between the Berryfield Estate etc

The whole idea of building 294 houses at this end of town when we have no facilities is beyond me, no Dr's, Dentist, only on primary school which is always full, no shops etc the road from Estover going to Station Road with the rail crossing will become a nightmare, its bad enough as it is now with sometimes a wait of up to 15 minutes if you have passenger trains and yard trains all at the same time, it doesn't help that people park their cars along this approach to the railway station to escape the parking charges.

A few years ago the SOS dismissed this plan/appeal so why is it now back on the Draft Local planning, Is this council too lazy to look at other prospects because it seems to me you are.

Now get a grip and do your jobs that you were elected to do. This is not an issue of not in my backyard it just doesn't make sense for this area to be developed.

Title:		Position:	
First Name:	Elizabeth	Organisation:	
Surname:	Whitehouse		

Comment	Object
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LP39.2 refers to Land to the Southeast of 433 Wisbech Road, yet clearly from the description it refers to Land North of Estover Road (which is 4.5 miles away, according to Google Maps), This exact area was the subject of a Planning Application by St John's College Cambridge in 2015. Your inset Plan - 16_March_inset.pdf attached to the Draft Local Plan shows exactly the proposed area that was submitted by the college in 2015 under Ref F/YR15/0668/O (supported document attached), which was subsequently refused by Fenland District Council on 12th September 2018, taken to Appeal with the Planning Inspectorate by St Johns College under Ref APP/D0515/W/19/3224755. The Appeal was subsequently dismissed by the Inspectorate on 10th May 2019.

Nothing has changed since this decision was made, only 3 years ago, I fact things have become worse with schooling, Doctors, and in particular the railway crossing, with barrier down times increasing dramatically. As the Draft Local Plan states March is extremely below quota for green spaces and there is little justification in taking this 100% greenfield agricultural land into the development area.

The March Neighbourhood Plan, approved by the Town Council in 2017, which is in place up to 2030 has not been considered against this Draft Local Plan in fact the current proposals are in direct conflict with this. I would also point out that nearly 3 years from its figures on projected housing cannot be counted as 2023 is fast approaching – figures will need to be re-issued. Apparently, the current Local Plan also runs to 2031 which is in synchronisation with the Neighbourhood Plan of the Town Council. Issuing a new Local Plan early would also put the District Council and the Town Council to considerable unnecessary expense and a drain on precious funding, ultimately from local residents. Please note that Fen Causeway (Roman Road) runs directly through the middle of this site, no mention at all in the Plan, once built over it will be lost forever.

Title:

Position:

First Name: Natalia

Organisation:

Surname: Williams-Wandoch

Comment **Object**

LP39, LP39.02, Land Southeast of 433 Wisbech Road, Page 123

I object to the above referenced policy/paragraph/site, because:

Firstly, this site refers to the wrong location. The correct location indicated by the Local Plan map is Land north of Estover Road.

I object to the Proposed Housing Land north of Estover Road.

A large part of the proposed allocation was considered for development in 2018 and was refused by FDC on the grounds that it would be detrimental to the general character and appearance of the area and would be contrary to Policy LP16 (d) of the Local Plan. An appeal followed and the FDC ruling was upheld by the Secretary of State citing similar reasons. As this land has already been found unsuitable for housing, an even larger proposed development would still be unsuitable and would protrude even further into the open countryside.

The Site Evidence Report in the Local Plan states that the proposed jousting would relate to existing built development to the south, west and north, and would provide a suitable extension to the town. There is no existing built development to the west as this consists of Estover Playing Field. To the east is open countryside. Any development on this site would be a major intrusion into the open countryside and not a suitable extension to the town.

For the above reasons, this housing allocation is not suitable and should be deleted from the Local Plan.

Title:**Position:****First Name:** Elizabeth**Organisation:****Surname:** Seymour**Comment****Object**

I think it is a ludicrous idea. The roads around March can't cope with the traffic as it is, let alone having another potential 600 cars on the road. The main access points into the town centre are via Creek Road Level Crossing or Station Road Level Crossing. We already have to sit there for up to a good 10 mins due to the ever increasing train numbers. The queues of traffic will be horrendous.

Where in the plan does it mention about more schools, dentists and doctors surgeries being built?? They're already full to capacity, and many people can't even get an NHS dentist or ate on waiting lists. Where are these potential 1000 extra people going to go? Or do you expect everyone to have their kids home educated and everyone to forget seeing a Doctor and do their own dental work? You really haven't thought this through!

The queues coming out of Sainsbury's are terrible sometimes, and with another possible 600 cars on the road, it will be an absolute nightmare. It is a real shame that other exit wasn't agreed to. That would have at least helped matters.

There is also the problem with potential flooding. Most new housing estates have postage stamps for gardens, most of which are block paved, so there's nowhere for any water to drain to.

As well as everything I mentioned, it will also ruin our outlook. One of the best things about March is the Countryside opposite our house and on the outskirts. If we don't have this, and just have houses everywhere, there will no longer be anything appealing about March. If I wanted to see brick buildings everywhere, I would have moved to a city.

Also who are these houses for? If the potential residents are not going to help bring anything to the town, then what is the point. All this boils down to, is how much money can be made whatever the consequences.

Title:**Position:****First Name:** Michael**Organisation:****Surname:** Rutter**Comment** **Object**

The proposed housing allocation, North of Estover Road, March, should be deleted from the Local Plan.

1) It ignores the previous representations made by residents & has not considered any professional statements made by experts.

2) It is contradictory to an important decision made by a Secretary of State Appointed Inspector:-
FDC dismissed an application made by the landowner, who subsequently appealed. The Decision made by the Government Appointed Inspector was "The appeal is dismissed".

The "Main Issue is the effect of the development on the character & appearance of the area".

Reason 13:- "The development would have an undesirable urbanising effect on the local landscape & would result in the permanent loss of countryside".

3) It is contradictory to previous statements made by FDC, which results in nonsensical arguments with itself:-
FDC's Planning Notice Decision, Aug. 2015. "Permission is refused - Land North of 75 - 127 Estover Road, March.

Reasons:- "The application proposes a form & scale of development which would not respond to the core shape & characteristics of the existing settlement, which if permitted, would be to the detriment of the character & appearance of the area".

It is also contradictory to FDC's own Sustainability Appraisal (relating to CS9):- HS25.

This then refers to CD012:- "Pages 5 &6 give a clear rationale as to why the NE March allocation should not be included in the final plan submitted for examination. It is quite evident that Sustainability Appraisal informed & influenced the decision".

The Local Plan Team:- "This area of land on it's own is more detached from the main built form of the town, whereas the proposed allocation provides a more comprehensive scheme & scores well against the assessment criteria".

This is totally ridiculous. How can adding 199 houses to the countryside, where the land has already been decided as not suitable for any growth, be a better form for the town?

Title:**Position:****First Name:** Ken**Organisation:****Surname:** Whitehouse**Comment** **Object**

The comments in quotes below are those of my wife, Elizabeth, and I wish to fully endorse her opinions.

In fact, I will go further by asking why it is that FDC have decided to abandon their current local plan halfway through its lifespan. Is it because that, after just eight years, it is no longer fit for purpose and if so, what sense is there in embarking on another version for the next eighteen years given the current uncertainties of the country? Wouldn't it be better to stick with what we have until we have a clearer view of the future? If the political propensity of the Nation for U-turns is anything to go by then surely there is no better candidate than this Draft!

The March Neighbourhood Plan, which runs until 2030, is mentioned on pages 121 & 122 of your Draft but appears to give scant regard to it. There is no real explanation of how it will interleaf with the aspirations of the Town Plan or of how the two plans will work in harmony in the future. I would have liked to have seen more clarity on this without the need to search through 178 pages!

I have written separately to Mr Chris Boden on this matter, and I trust he will see fit to include my letter to him in this consultation. The comments of my wife are as follows:-

"LP39.2 refers to Land to the Southeast of 433 Wisbech Road, yet clearly from the description it refers to Land North of Estover Road (which is 4.5 miles away, according to Google Maps), This exact area was the subject of a Planning Application by St John's College Cambridge in 2015. Your inset Plan - 16_March_inset.pdf attached to the Draft Local Plan shows exactly the proposed area that was submitted by the college in 2015 under Ref F/YR15/0668/O (supported document attached), which was subsequently refused by Fenland District Council on 12th September 2018, taken to Appeal with the Planning Inspectorate by St Johns College under Ref APP/D0515/W/19/3224755. The Appeal was subsequently dismissed by the Inspectorate on 10th May 2019.

Nothing has changed since this decision was made, only 3 years ago, I fact things have become worse with schooling, Doctors, and in particular the railway crossing, with barrier down times increasing dramatically. As the Draft Local Plan states March is extremely below quota for green spaces and there is little justification in taking this 100% green-field agricultural land into the development area.

The March Neighbourhood Plan, approved by the Town Council in 2017, which is in place up to 2030 has not been considered against this Draft Local Plan in fact the current proposals are in direct conflict with this. I would also point out that nearly 3 years from its figures on projected housing cannot be counted as 2023 is fast approaching – figures will need to be re-issued. Apparently, the current Local Plan also runs to 2031 which is in synchronisation with the Neighbourhood Plan of the Town Council. Issuing a new Local Plan early would also put the District Council and the Town Council to considerable unnecessary expense and a drain on precious funding, ultimately from local residents.

Please note that Fen Causeway (Roman Road) runs directly through the middle of this site, no mention at all in the Plan, once built over it will be lost forever.

LP39.02

Title:		Position:	
First Name:	Trevor	Organisation:	
Surname:	Watson		

Comment	Object
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This Allocation is termed as LP39.02 "Land Southeast of 433 Wisbech Road on Page 123. This is wrong, it should read "Land north of Estover Road"LP39.02/. This has confused residents, and is misleading.

Allocation of this area for 294 dwellings, is inconsistent with recent previous planning decisions. A planning Refusal for 95 dwellings was given on a large part of this allocation by Fenland District Council only four years ago. The reasons given were, "It would be detrimental to the general character and appearance of the area and would be contrary to Policy LP16(d) of the Local Plan." It should be noted, that the applicants did indicate a draft scheme for further housing on the land to the north, (reflecting the current allocation in the Draft Local Plan), but this did not form part of their current application. The District Council were therefore fully aware at that time, that the applicants were intending to develop further beyond their current application. March Town Council, also refused this development.

There was wide objection by many residents living in the north east of the town against this scale of development into the open countryside.

The applicants Appealed against that Refusal. The Secretary of State, Dismissed that Appeal, mainly on the same grounds as that stated by the District Council. ie it would be a major visual intrusion into the open countryside. To Allocate further housing land, into open countryside is wrong. In the Sites Evidence Report, it states that " this site would relate to existing built development to the south, west and north and provide a suitable extension to the town". There is no "existing built development to the west", to the west is the open playing field, of Estover Playing Field, that cannot be termed as "existing built development"! To the east is open countryside. No way can this allocation be referred to as relating to existing built development. It is plain to see it would be a major intrusion into the open countryside. This fact was supported by March Town Council, Fenland District Council and the Secretary of State, as recently as 2018.

I have been told by the District Council that one of the reasons for allocating this larger area is, "that the previous land for 95 dwellings, (refused by both the District Council and the Secretary of State), was on its own was more detached from the main built form of the town, whereas the proposed allocation provides a more comprehensive scheme and scores well against the assessment criteria". I have to say that statement is wrong. You just cannot justify building another 200 dwellings into the open countryside, would be better related to the existing form of the town. That is nonsense!

This site should therefore be deleted from the Local Plan.

Title:	Mrs	Position:	
First Name:	S	Organisation:	
Surname:	Pim		

Comment	Object
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There is not enough current infrastructure (or planning of such) to support a large development in this area. Basic needs such as doctors' surgeries, dentists, schools and utilities.

There is traffic congestion on poor roads in the area of suggested development. Also, a loss of local access to the countryside will occur, which in these challenging times is so important to our health.

Title:

Position:

First Name: Paul

Organisation:

Surname: Suttling

Comment

Object

A total break in democracy let alone trust and what's right this site wasn't right for development 4 years ago multiple refusals, lies and misinformation from the agents didn't change that, building here without extensive drainage sewage flood defence for existing properties would be criminal at least.

Dishonest planners !!!!!

Title:

Position:

First Name: John

Organisation:

Surname: Tuerena

Comment

Object

The infrastructure issues with the proposed development of North East March are well founded and have been discussed at length and argued about for years, and yet no one in the Fenland District Council (FDC) nor the Cambridgeshire County Council (CCC) seem to have the intelligence to recognize this?

“There are none as blind as those who will not see and none as deaf as those who will not listen”, and the power of the people may have been circumvented by smoke and mirrors with the interested parties rubber stamping illegitimate projects but who will pay the price should this maniac scheme go ahead?

Like the people who bought houses close to the disused Whitemoor railway yard many years back, because it was to be developed as a nature reserve. They later found out that the area was to be redeveloped as a rail depot that re-opened during May 2004. They now have constant noise day and night, diesel fumes from stationary rail engines standing idle spewing out pollution. Banging and crashing as trucks full of rails, sheet metal and aggregate are unloaded.

The din can be heard hundreds of meter’s away, so heaven knows what racket residents have to suffer being as close as they are to the yard. Having windows open during hot summer nights resulted in broken sleep often because disrespectful train drivers blow engine horns after 11 pm into the early hours. Network rail built a massive dirt wall between the rail yard and the housing estate, which looks awful, and still lets noise and fumes past it.

If the North East March building programme goes ahead the people who will pay the price for the development will be the house buyers. The area is a flood-plane, this is a fact, so will they get buildings insurance? Maybe or maybe not, and if so at what price. In the worst case scenario what happens after the first flood incident and beyond? Will developers or FDC who backed any failed project compensate home owners? Not likely!

The possibility of flooding anywhere in March today I greater than ever without any further building or development. The damaging historical floods from excessively heavy rain showed up all the vulnerable areas and this type of event is more likely in the future.

The planned development of cheap, shoddy build wood-frame dwellings, is madness. Who can we trust on the planning committee? Who is related to whom, with a pecuniary interest in any of the projects proposed? Who’s having a quiet word in the shadows with interested parties to ensure projects get the go-ahead?

Will there be payments overlooked or just ignored by councilors so that developers can make even greater profits from the future slum properties being proposed? It’s happened before and it can happen again if we the rate payers don’t protest.

A majority of the proposed development is on arable farmland. So why sacrifice the ability to grow food for housing or commercial development. After all you can’t eat a house.

There were 261 objections from residents during the consultation period opposing the Regal Fields Development, but this project went ahead anyway. So will any opposition be accepted? I have no faith with any FDC Planning Committee members who fail to listen to the people who pay their expense claims. The ordinary rate payer who vote councilors in to serve the public and not their own self interests.

LP39.02

Title:

Position:

First Name:

Organisation:

Surname: Brooks

Comment **Object**

LP39-02 Site Allocation - page 123 of Local Plan refers to land southeast of 433 Wisbech Road. This is incorrect and therefore misleading as the true location is "hidden", making it harder for local residents to comment. The land is north of Estover Road. A completely different area of the town.

LP39-02 - Part of this allocation has already been deemed unsuitable for housing by FDC as being detrimental to the general character and appearance of the area after a planning application for 95 new dwellings. The Secretary of State agreed and dismissed the appeal to the planning application. Why do FDC now consider an even larger piece of open countryside / farmed land to be suitable? Policy LP38 states there is a "deficit of open space and sports provision" yet you are allocating more open space to development.

LP39-02 - Sites Evidence Report page 34. Misleading statements. A majority of the site's borders are with Estover Playing Field and open farmed land not existing built development. The built development to the east is a single row of dwellings not a development. By allowing this site to be included in the plan we will lose more open countryside / farming land.

SHELAA Score is inconsistent with LP39-08 - both allocations should be rated a D or E.

Title:

Position:

First Name: Dave & Bev

Organisation:

Surname: Everett

Comment **Object**

In the last local plan, it was decided that no developments were to be built on land in the north east of March. There were a lot of objections. What has changed? The infrastructure of the area comprising the land of the north east area of March comprises of narrow local roads, roads that subside and become pothole ridden quite easily. These roads were not made to take traffic movements from the amount of properties already in situ, let alone another 300 - 400 properties. Facilities in the area are sparse, schools full to capacity, no local doctors or dentists. The decision made by the secretary of states inspector on the 10th May 2019 was to dismiss an appeal made by St Johns College, Cambridge to grant outline planning permission, again what has changed?

Title:

Position:

First Name: Sandra

Organisation:

Surname: Coote

Comment **Object**

I am against this proposed planning by FDC. I would have thought this matter had been put to bed long ago but it seems we have the same proposal and nothing has changed. The infrastructure isn't capable of supporting the building of a fraction of the homes, let alone 294, or the 61 proposed for Berryfield. The Secretary of State gave good reason why St John's College, Cambridge, was dismissed on a previous occasion. It is a 'major intrusion into the open countryside' and doesn't make sense. I strongly object to this proposal.

LP39.02

Title:

Position:

First Name: Jason

Organisation:

Surname: Coote

Comment **Object**

The proposal of the FDC to build houses on this land is clearly a bad idea as already stated by the Secretary of State when the appeal by St John's College, Cambridge was dismissed. The infrastructure doesn't come close to supporting such an extreme number of houses. I object to this and being a resident of Roman Way wish my thoughts to be heard.

Title:

Position:

First Name: Kathleen

Organisation:

Surname: Ryland

Comment **Object**

Has the water board now guaranteed there will be no flooding to the property's in Estover if building goes ahead. Also Will there be another access road other than using Estover as there is already high volume of traffic and no infrastructure in the area for all these buildings

Title: Mrs and Mr

Position:

First Name: T M and P G

Organisation:

Surname: Garner

Comment **Object**

We are residents of Estover Rd and are disgusted that this plan has arisen again. The plan for these houses is wrong not only because of the reasons they were refused last time, as nothing has changed, in fact things are worse, more trains, more cars, even harder to see a Doctor or Dentist.

It is even more important to let the farmer grow more produce to feed the country. And to let the wildlife roam free. The residents also saw the true plans of what and how the house were going to be built.

They were going to be built at a higher level with flood defence, so they would be protected from any future flooding, while the existing residents would all be flooded (who would we sue!!!). This Field is a very important field to the town flood defences if there was a problem with the pumps.

There must be better and safer land to build on, March is a very unique place and needs protecting.

Also as this has already been refused by all parties including the Planning inspector on behalf of the Secretary of State what has changed. This should not be considered as part of the March Plan.

LP39.02

Title:

Position:

First Name: Lauren

Organisation:

Surname: Vint-McGee

Comment

Object

The proposed property development would not only cause excessive traffic along an already busy road, but also would destroy perfect farmland, create drainage and infrastructural issues in the area, and ruin the outlook that has brought all current residents to the area. Estover road is known to be a quiet, safe and beautiful area for the elderly and the young - and a development like this would change the quality of life for those who live here. I for one would be leaving the area with my toddler if planning permission is granted, after moving 300 miles last year to this property, in order to enjoy the outlook and safety that the road currently offers.

Title:

Position:

First Name: Matthew

Organisation:

Surname: Seymour

Comment

Object

The proposed idea was rightly rejected before for very valid reasons. Firstly a huge increase in traffic in an areas already plagued with traffic issues. Potential effects to the flood plain affected the houses already on Estover Rd. An eyesore, and may affect house value. Destruction of green areas, and the environmental impact of that. Significant increase in population and no increased capacity in facilities, schooling etc. Houses on average have more than one vehicle. Greater potential for accidents, and blocked roads due to parking on the street. Building new houses would be better on outlying areas where access would be better, such as areas near the bypass.

Title:

Position:

First Name: Ken

Organisation:

Surname: Dryden

Comment

Object

Whilst I accept that additional housing is needed within Fenland and within March in particular, I strongly feel that no additional land allocation should be considered until all outstanding approved Planning applications for housing within the district are first brought to fruition.

In particular, site allocation LP39.02 (which incidentally is wrongly labeled as "land SE of 433 Wisbech Road") is land similar to a previous Planning application by St Johns College that was refused by both Fenland Council and the Secretary of State on appeal. The Planning Inspector, on behalf of the Secretary, stated that "the proposal would be a major intrusion into the open countryside."

The additional traffic generated by some 294 dwellings would, I feel, put undue stain on existing infrastructure and in particular, the existing road network. Both Elm Road, and Creek Road have level crossings which already result in delays and congestion on these two roads. This will only get worse as the number of trains passing through these crossings appears to be increasing and will be exacerbated even further if these dwellings are built on LP39.02.

The water table within the Estover Road/Creek Road is already quite high leading to waterlogged gardens/land and the additional houses proposed for LP39.02 could well make things worse for existing properties by disrupting/increasing the natural water table flow.

LP39.02

Title:

Position:

First Name: James

Organisation:

Surname: Lawrence

Comment **Object**

This site is referring to the wrong location. The correct location is Land north of Estover Road. This reference is misleading and confusing.

A large part of this proposed allocation was turned down by Fenland on the grounds it would be detrimental to the general character and appearance of the area. It would therefore be contrary to Policy LP16 (d) of the Local Plan. The decision was upheld by the Secretary of State on similar grounds to Fenland. As this land was unsuitable for housing then, I cannot see how the land would be suitable for housing now and should be deleted from the Local Plan.

The Site Evidence report is misleading in respect of this allocation. It is misleading to state that this allocation abuts the existing built form of the town and would therefore provide a suitable extension to the town.

For the above reasons, this housing allocation is not suitable for future housing and should be removed from the local Plan. If developed it would be a major intrusion into the open countryside.

Title:

Position:

First Name: Susie

Organisation: St John's College Cambridge

Surname: Wood

Comment **Support**

Support for Site allocation LP39.02: Land Southeast of 433 Wisbech Road as owner of the site.

The site will be available during the plan period, is suitable and deliverable.

The expectations of the allocation, namely: suitable vehicular access, footway and cycleway connections; Flood Risk Assessment; archaeological evaluation; and safeguarding of protected trees and appropriate landscaping and planting are all achievable.

The site could deliver approximately 294 dwellings, is in single ownership, there are no known technical constraints and it is located in a sustainable settlement, adjacent to playing fields and within walking distance of key services and facilities including the train station, a primary school and employment opportunities. It is also a short distance from the town centre.

We fully support the Council's conclusion that the "site would relate to existing built development to the south, west and north and provide a suitable extension to the town" (Sites Evidence Report) and that the benefits of allocating the site now would outweigh the limited harm to the landscape (SHELAA), which in turn reflects the earlier Planning Inspector's comment that the level of harm which would arise from the residential development of part of the site is not significant.

This allocation, and many others, expects a Flood Risk Assessment "which reflects the recommendations of the SFRA Level 2 assessment", but only the Level 1 SFRA August 2022 is available in the Local Plan Document Library.

LP39.02

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

Comment **Neutral**

This is a large site for 294 dwellings. There are no designated heritage assets within the site or nearby. No comments.

Title:	Mrs	Position:	
First Name:	Myrtle	Organisation:	
Surname:	Penrose		

Comment **Object**

1. Firstly this site refers to an incorrect No site. It should be Land north of Estover Road. Very disappointed incorrect information has been provided.

2. Most of this proposed allocation was turned down for development about 4 years ago by Fenland and then the Secretary of State as it would be detrimental to the general character and appearance of the area. This would therefore be contrary to Policy LP16 (d) of the Local Plan. Nothing has changed on this site and any development would be a major intrusion into the open countryside.

3. The Site Evidence Report relating to this site is incorrect and misleading. The report states that this allocation abuts the existing built form of the town and would therefore provide a suitable extension to the town. There is no building there except for a playing field which consists of 1 pavilion.

In my opinion this housing allocation is not suitable for future housing and should be deleted from the Local Plan.

Title:	Mr	Position:	
First Name:	Stuart	Organisation:	
Surname:	Large		

Comment **Object**

The site refers to the wrong location, The current location is Land north of Estover Road, Proposed Housing Land north of Estover Road, 294 dwellings.

An application for development of this land was turned down by FDC on the grounds it would be detrimental to the general character and appearance of the area and would be contrary to Policy LP16 (d) of the Local Plan. the Secretary of State agreed and upheld the decision. I do not understand why this proposed allocation is being considered again. the appeal decision was not appealed by St Johns College and therefore it should stand.

In the site Evidence Report there is misleading information provided in that the report states the proposed allocation would relate to existing built development and indicates this allocation abuts the existing built form of the town and would therefore provide a suitable extension to the town.

I live opposite this site and I am extremely concerned about the flooding that regularly occurs in the area. The field is prime arable land and should be kept that way. For all these reasons the housing allocation is not suitable for future housing and should be deleted from the Local Plan.

LP39.02

Title: Mr and Mrs
First Name: John and Anne
Surname: Lloyd
Position:
Organisation:

Comment **Object**

1. The site allocation refers to the wrong location. The current location is land north of Estover Road.

2. Proposed Housing land north of Estover Roa

A large part of the allocation was the subject of a planning application in 2018 for 95 dwellings which was turned down by FDC on the grounds it would be detrimental to the general character and appearance of the area and therefore contrary to Policy LP16 (d) of the Local Plan. March Town Council did not support this application. An appeal was subsequently upheld, mainly on the grounds put forward by FDC. The land was unsuitable for development then and to suggest such a large development now doesn't make sense as the allocation would protrude even further into the open countryside.

The Site Evidence Report is incorrect and misleading in that it states the allocation abuts the existing built form of the town and would therefore provide a suitable extension to the town. If development takes place, it would be a major intrusion into the open countryside.

For the reasons above, the housing allocation is not suitable for future housing and should be deleted from the the Local Plan.

Title: Mrs
First Name: Isobel
Surname: Tunley
Position:
Organisation:

Comment **Object**

A. This site refers to the wrong location. The correct location is Land north of Estoveroad.

B. A large part of this proposed allocation was the subject of a planning application about 4 years ago for 95 houses. This was refused by FDC on the grounds it would be detrimental to the general character and appearance of the area therefore contrary to Policy LP16 (d) of the Local Plan. The Secretary of State dismissed the appeal, mainly on the grounds put forward by FDC. As this application was found unsuitable for housing then, I do not see how the application is suitable for housing now as the proposed allocation would extend even further into the open countryside. As a result I feel that this allocation should be deleted from the local plan.

C. The Site Evidence Report states that this proposed housing would relate to existing built development which is not true as there is just a playing field and farmed fields. It is further incorrect to state that this allocation abuts the existing built form of the town and would therefore provide a suitable extension to the town. For the above reasons, this allocation is not suitable for future housing and should be deleted from the Local Plan.

LP39.02

Title: Mr & Mrs
Position:
First Name: Peter & Nita
Organisation:
Surname: Bailey

Comment **Object**

1. This site refers to the wrong location. The correct location is Land north of Estover Road.
2. Four years ago a planning application on this site was turned down on the grounds it would be detrimental to the general character and appearance of the area. It would be contrary to Policy LP16 (d) of the local Plan. On appeal it was upheld by the Secretary of State mainly on the grounds put forward by FDC. As this site was unsuitable for housing then, nothing has changed and still remains unsuitable. This proposed allocation would protrude even further into the open countryside and should be removed from the Local Plan.
3. The Site Evidence Report states that this housing allocation would relate to existing built development - it does not. A site visit would show that there is no existing development. For the above reasons, this housing allocation is not suitable for future housing and should be deleted from the Local Plan.

Title: **Position:**
First Name: Josephine & Peter
Organisation:
Surname: Kupyn

Comment **Object**

This is a major housing proposal. This area was subject of a planning application, by St. John's college a few years ago, but the district council refused it. The applicants appealed against that decision but the planning inspector on behalf of the Secretary of State dismissed that appeal on the grounds, "the proposal would be a major visual intrusion into the open countryside". That meant the Secretary of State considered this area was unsuitable for housing. Why is fenland district council, now proposing this area for major housing development? Not only would this proposal be contrary to the Secretary of State but would also further increase extra traffic on the already congested road network. Creating a detrimental impact on the now struggling infrastructure along with removing less open space for wildlife and the environment. This should not be allowed to go ahead.

LP39.02

Title: Mr **Position:**
First Name: John **Organisation:**
Surname: Ellinor

Comment **Object**

I object to the above referenced policy/paragraph/site because: I feel you are misleading the public by using the incorrect details for the site as it should be Land North of Estover Road. I feel you are making it difficult for people to respond to this survey.

Back in 2018/2019, residents of Estover Road and others objected to the planning application for 95 houses with additional phases to take it to about 300 houses were successful in getting an housing application turned down by Fenland Council and then the Secretary of State agreed with the decision on appeal. How can this land now be considered or development? The land owners I believe St Johns College of Cambridge had the opportunity to appeal and request a judicial review within 6 months of the decision made. As this didn't happen, we were informed that was the end of the matter. This is still the same land that was found not suitable for housing, how can a larger piece of land that would be a blot on the landscape be considered now?

According to the site evidence report this states that the site in question would provide a suitable extension to the town - the area consists of a playing field and farm land (this is farmed every year). This would be a significant intrusion into the open countryside.

For these reasons alone this allocation is not suitable and should be deleted from the Local Plan.

Title: **Position:**
First Name: Chris **Organisation:**
Surname: Holdsworth

Comment **Object**

It is with utter amazement that I am informed that planning application is being made for 294 new dwellings to be constructed near the Estover Road playing fields.

A planning application for housing was made several years ago by St. Johns College on this land, but this was refused by FDC. The applicants appealed against that decision but the Planning Inspector on behalf of The Secretary of State dismissed that Appeal on the grounds that the proposal for housing "would be a major visual intrusion into the open countryside"

I ask the question, why is FDC now proposing large scale housing on the same land in their Draft Local Plan, when The Secretary of State has only recently stated, this area, is not suitable for housing?

This is a major housing in the north east of March, and the infrastructure in this part of town at present cannot support this proposed development. I am voicing a deep concern over this proposal and will be actively supporting refusal to grant the application.

In the draft local plan, 40252, page 123, site allocation LP39.02 it refers to 294 dwellings southeast of 433 Wisbech Road, covering Estover Road and the playing fields area. This is what I have been referring to and objecting against, for the reasons mentioned previously (above).

LP39.02

Title: Mr & Ms **Position:**

First Name: David & Jacqueline **Organisation:**

Surname: Dean & Gooch

Comment **Object**

This site refers to the wrong location. The correct location is land north of Estover Road.

Proposed Housing Land north of Estover Road, 294 dwellings

A large part of this site has previously been the subject of a planning application about 4 years ago for 95 dwellings. This was refused by FDC on the grounds it would be detrimental to the general character and appearance of the area and therefore contrary to Policy LP16 (d) of the local Plan. This was refused by March Town Council, Fenland District Council and on appeal by the Secretary of State. As the appeal was not taken further ie a judicial Review we thought this was the end of any planning application for this site as it is unsuitable for housing.

The Site Evidence Report states incorrectly that this housing allocation would relate to existing built development. It is misleading to state that this allocation abuts the existing built form of the town and would therefore provide a suitable extension to the town. If developed it would be a major intrusion into the open countryside.

For all the above reasons, this housing allocation is not suitable for future housing and should be deleted from the local Plan.

Title: Mrs **Position:**

First Name: Marie **Organisation:**

Surname: Sproston

Comment **Object**

1. The site is referring to the incorrect location and should be Land north of Estover Road.

2. Proposed Housing Land north of Estover Road, 294 Dwellings

A large part of this proposed allocation was refused by FDC and the Planning Inspectorate on the grounds it would be detrimental to the general character and appearance of the area. Therefore, it would be contrary to Policy 16 (d) of the Local Plan.

As this land was found unsuitable for housing before, I do not agree that it would be suitable by building with even more houses as it would extend even more into the open countryside.

3. I feel that this whole proposed allocation is misleading the public as stating the following information that is not correct: Estover Road on the left-hand side of the road has no development so this cannot provide a suitable extension to the town. If developed it would be a significant intrusion into the open countryside.

On the above facts I feel that this housing allocation is not suitable for future housing and should be deleted from the Local Plan.

LP39.02

Title: Mrs **Position:**

First Name: L **Organisation:**

Surname: Alterton

Comment **Object**

I feel that the appeal decision taken by the Planning Inspectorate (Chris Forrett) on 10th May 2019 is still relevant now. So therefore I don't think the land in this area should be considered to go into the new local plan.

I have enclosed a copy of the appeal decision that was refused in 2019. I have highlighted numbers in the report No4, No9, No10, No13, No14 because they are matters to be considered going forward.

Title: **Position:**

First Name: Hilary **Organisation:**

Surname: Storer

Comment **Object**

- Greenfield (agricultural) land should not as a rule be used for housing – brownfield and infill sites should be used instead.
- A previous planning application (by St Johns College Cambridge) was refused as “the proposal would be a major intrusion into the open countryside.” What has changed now?
- Such a large development (up to 300 houses) would add considerably to the strains on the infrastructure of the northern edge of the town. Where are new residents to find health care and school places? Are there to be local shops? Are play spaces for the children planned? Most importantly, how is all the extra traffic to be managed?
- Current residents need to be reassured that drainage problems and flooding risk are not to be increased if such a development takes place.

Title:

Position:

First Name: Stephen

Organisation:

Surname: Court

Comment **Object**

I am writing to you with regards to the draft version of the Fenland local plan. I have been reading this to compare it to the present FDC Local Plan of 2014.

One big change that I have noticed is in relation to the proposed housing allocation off Estover Road in March. The proposal is for 294 dwellings located off Estover Road March, east and north of Estover Playing field and south of the Berryfield estate.

A planning application was made several years ago by St Johns College to build houses on this land, but this was refused by FDC. The applicant then appealed against this decision and the planning inspector on behalf of the Secretary of State dismissed the appeal.

Looking at page 42 of the current local Plan, policy LP9 gives the specific locations for house building in the town. South east March being a strategic location for around 600 dwellings to be built. Then South west March is a broad location for growth with around 500 dwellings and some business development. West March is seen as a strategic location again predominantly residential with around 2000 dwellings.

There is no allocation for building in the north of the town. The reasons for this have been clearly defined in the past. The proposed allocation off Estover Road March (north east of town) does not comply with policy LP9 of the Fenland Local Plan.

Why is FDC now proposing large scale housing on the same land when the Secretary of State has only recently stated that this area is not suitable for housing?

Please could you include this letter as an objection against the proposed build in north east March as it does not comply with policy LP9 of the Fenland Local Plan.

LP39.02

Title:

Position:

First Name: Susan

Organisation:

Surname: Clenshaw

Comment

Object

This site refers to the wrong location and is misleading and confusing. The correct location is "Land north of Estover Road."

Proposed Housing Land north of Estover Road, 294 dwellings, 13.7 Ha

A large part of this proposed allocation was the subject of a planning application, four years ago, for 95 dwellings. This was refused by the District Council, on the grounds it would be detrimental to the general character and appearance of the area. It would therefore be contrary to Policy LP16 (d) of the Local Plan.

March Town Council also requested this application be refused. The March Neighbourhood Plan was also against this development.

The application went to Appeal, but the Secretary of State dismissed that Appeal, mainly on the grounds put forward by the District Council.

My objection relates to the fact that a large part of the current proposed allocation has already been found not suitable for housing, therefore, allocating even a greater area of land is certainly not suitable. The proposed allocation would protrude even further into the open countryside.

It is quite evident that this allocation would be a major visual intrusion into the open countryside, backed up by previous planning decisions, including the Secretary of State, and should, therefore, be deleted from the Local Plan.

Site Evidence Report

The reference that this proposed housing allocation would relate to existing built development is incorrect.

It is misleading to indicate this allocation abuts the existing built form of the town and would therefore provide a suitable extension to the town. The report states that "this site would relate to existing built development to the south, west and north and provide a suitable extension to the town". There is no "existing built development to the west", to the west is the open playing field, of Estover Playing Field, that cannot be termed as "existing built development"! To the east is open countryside. No way can this allocation be referred to as relating to existing built development. If developed it would be a major intrusion into the open countryside.

Why is good quality agricultural land in the open countryside being considered for the development of 294 dwellings? This is just for the benefit of the land-owners and certainly not for the people who live down Estover Road and March as a whole.

For the above reasons, this housing allocation is not suitable for future housing and should be deleted from the Local Plan.

LP39.02

Title:

Position:

First Name: Trevor

Organisation:

Surname: Watson

Comment

Object

Object to the proposed Housing Allocation North Of Estover Road, March. Disagree that this area, "relates to excising built development to the south, west and north and provides a suitable extension to the town", as stated in the Draft Local Plan.

This area forms part of the open countryside, as illustrated by the photograph attached.

That view was reflected in The Refusal Notice issued by Fenland District Council in 2018, for 95 dwellings on a large area of the current draft allocation, followed by a Appeal dismissed, by the Secretary of State . Both stated that this area, "would be detrimental to the character and appearance of the area, and, would, therefore fail to make a positive contribution to local distinctiveness and character or enhance its local setting". Those statements made by both Fenland District Council and the Secretary of State relate to the present day, and to allocate 294 dwellings, in the open countryside is wrong, and could be termed as bad planning. This housing allocation, therefore, should be deleted.

Title:

Position:

First Name: Anne

Organisation:

Surname: Bates

Comment

Object

1. This site refers to the wrong location. The correct location is Land north of Estover Road. This has caused me some confusion.

2. Proposed Housing Land North of Estover Road

A large part of the proposed allocation was the subject of a planning application, in 2018. This was refused by Fenland District on the grounds it would be detrimental to the general character and appearance of the area and would be contrary to Policy LP16 d) of the Local Plan.

The matter was appealed, but the Secretary of State upheld the decision.

I cannot understand why this housing allocation is being considered, planning had been turned down and to apply for an even larger area would mean that the dwellings would protrude most significantly into the open countryside.

3. The Site Evidence Report in respect of this allocation is also incorrect. The report states that the allocation abuts the existing built form and would provide a suitable extension to the town, it does not as to the west is the Estover Playing Field and to the south is the playing field and part of the open countryside.

For the reasons above, I do not think this housing allocation should proceed any further and should be removed from the local plan.

LP39.03

Title:
Position:

First Name:
Organisation: Fisher Parkinson Trust

Surname:

Comment **Support**
Background

Representations regarding the site identified in red on the attached plan under the Fenland District Council's Site ID Reference 40382 (Doc 1), and relates to land owned by the Fisher Parkinson Trust. The site extends to some 15.66 ha and is situated South of Knight's End Road and West of Wimblington Road, March. The site benefits from having the most substantial road frontage to Wimblington Road.

The site hugs the built-up area with plenty of visually well-contained mature landscape features. This is a prime allocation for new housing development within a sustainable location that is supported by planning policy.

Housing Allocations

- 2013 'Broad Locations for Growth'
- March Neighbourhood Plan (March South West - around 500 dwellings).
- Identified as Residential (LP39) on Draft Policies Map (August 2022) March (Inset 16) *
- Draft policies LP39.03 and 39.04 specifically to the Trust's land *

Promotion through the Local Plan process

Since 2012, the Fisher Parkinson Trust has promoted the site for housing development. This has involved regular meetings over a number of years with the relevant landowners.

Throughout this process, the Trustees furnished the Council with all relevant information and representations as part of the emerging Local Plan process.

There are significant costs for promotion which cannot be justified without the achievement of a formal allocation being the end goal. Scope exists for the Trust to work with other landowners and as a consequence, supports Policies LP39.07 and 39.10*. The site continues to attract serious interest from major house builders.

Conclusions

The scale of the proposed housing is substantial, with the result that deliverability is unlikely to be constrained by major infrastructure obligations.

This site is available and deliverable for housing development.

* Extract from "Fenland Local Plan 2021 - 2040. Draft Local Plan Consultation August 2022'

LP39.03

Title:	Mr	Position:	
First Name:	Michael	Organisation:	Veris Ltd
Surname:	Mottram		

Comment **Support**

LP39.03/ LP39.04/ LP40.02

The above site allocations are supported. Land owned by Veris Ltd shown on the attached plans should also be included as a site allocation for residential development in the Local Plan for the reasons set out in the attached covering letter.

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

Comment **Object**

This is a large site for 189 dwellings. There are no designated heritage assets within the site boundary but there is a grade II listed barn, to the west of the site.

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

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

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

Comment **Object**

These parcels form part of the current SW March area. It makes no logical sense to allocate these two parcels, the northern of which has questionable access without also allocating the land that lies between them (40006 and 40257) It has been the requirement under the current policy for a coordinated application that has been the barrier to progress not the owners of these sites, which could be developed in isolation, preventing progress

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

Comment	Object
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LP39.10 butts onto the backs of established housing on Wimblington Road as does LP39.03 butts onto housing on Knights End Road. The solution is to leave a reasonable strip of open land between the new and the old developments to allow for clean air to counter pollution from busy road traffic. To allow for wildlife,nature corridors and the peoples mental health. To avoid so much environmental heating around the properties

- 1.Any new developments should be built within the established boundaries of trees and hedgerows to protect the present natural wildlife in these areas. pulling down and replacing these habitats elsewhere is not appropriate.
 - 2.New developments should not butt up to existing properties but there should be a reasonable strip of open land surrounding the new development. This would allow the habitat and corridor for wildlife to exist while helping residents mental feeling of well being.
 3. Open land should be left surrounding new developments to help reduce the effects of increased pollution from increased traffic (Wimblington road is already very heavy from lorries, farm vehicles, buses and much more). To reduce the effects from increases household fuels for heating etc.
 - 4.Open land should be left surrounding new developments to help reduce the impact on the surrounding properties from the increased heating of the local environment due to extra buildings, concrete, bricks, mortar,tarmac etc.
 - 5.Is the loss of farmland a sensible idea when recently it has been shown the need in this country to grow more of our own food.
 6. Land west of Wimblington Road is home to a lot of important wildlife and plants. Bats, Hedgehogs, Woodpeckers, Owls, Raptors, Foxes, Deer, squirrels, a number of butterflies, moths, bees, wild plants. Do we want to disturb and maybe even lose these???
-

LP39.04

Title: **Position:**

First Name: **Organisation:** Fisher Parkinson Trust

Surname:

Comment **Support**

Background

Representations regarding the site identified in red on the attached plan under the Fenland District Council's Site ID Reference 40382 (Doc 1), and relates to land owned by the Fisher Parkinson Trust. The site extends to some 15.66 ha and is situated South of Knight's End Road and West of Wimblington Road, March. The site benefits from having the most substantial road frontage to Wimblington Road.

The site hugs the built-up area with plenty of visually well-contained mature landscape features. This is a prime allocation for new housing development within a sustainable location that is supported by planning policy.

Housing Allocations

- 2013 'Broad Locations for Growth'
- March Neighbourhood Plan (March South West - around 500 dwellings).
- Identified as Residential (LP39) on Draft Policies Map (August 2022) March (Inset 16) *
- Draft policies LP39.03 and 39.04 specifically to the Trust's land *

Promotion through the Local Plan process

Since 2012, the Fisher Parkinson Trust has promoted the site for housing development. This has involved regular meetings over a number of years with the relevant landowners.

Throughout this process, the Trustees furnished the Council with all relevant information and representations as part of the emerging Local Plan process.

There are significant costs for promotion which cannot be justified without the achievement of a formal allocation being the end goal. Scope exists for the Trust to work with other landowners and as a consequence, supports Policies LP39.07 and 39.10*. The site continues to attract serious interest from major house builders.

Conclusions

The scale of the proposed housing is substantial, with the result that deliverability is unlikely to be constrained by major infrastructure obligations.

This site is available and deliverable for housing development.

* Extract from "Fenland Local Plan 2021 - 2040. Draft Local Plan Consultation August 2022'

LP39.04

Title:	Mr	Position:	
First Name:	Michael	Organisation:	Veris Ltd
Surname:	Mottram		

Comment **Support**

LP39.03/ LP39.04/ LP40.02

The above site allocations are supported. Land owned by Veris Ltd shown on the attached plans should also be included as a site allocation for residential development in the Local Plan for the reasons set out in the attached covering letter.

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

Comment **Neutral**

This site is for 152 dwellings. There are no designated heritage assets within the site or nearby. No comments.

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

Comment **Object**

These parcels form part of the current SW March area. It makes no logical sense to allocate these two parcels, the northern of which has questionable access without also allocating the land that lies between them (40006 and 40257) It has been the requirement under the current policy for a coordinated application that has been the barrier to progress not the owners of these sites, which could be developed in isolation, preventing progress

LP39.05

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

Comment **Neutral**

This site is for 98 dwellings. There are no designated heritage assets within the site or nearby. No comments.

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

Comment **Support**

The allocation of the land south of Upwell Road March under this reference is supported. An application for planning consent is already submitted and the land owners are working with Allison Homes to deliver this site at an early stage of the plan period. It forms a logical extension of the town with existing development on 3 sides, and is entirely within Flood Zone 1. The current application demonstrates how housing on this site can be delivered and deals with the technical details.

The allocation is supported.

LP39.05

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

Comment **Support**

March Phase 1 Site Representation- Policy LP39.05

Allison Homes has submitted an outline application for up to 110 dwellings on Upwell Road, March. The proposed development offers a logical extension to the market town and is currently a draft allocation in the Emerging Local Plan.

Allison Homes fully supports the draft allocation for Upwell Road, March, and the allocation will help meet Fenland's housing targets in Policy LP2, where March is allocated 2,746 dwellings in the plan period (2021-2040), which equates to 26% of the total housing requirement for Fenland.

The draft allocation is for 98 dwellings for a site size of 3.94ha, which equates to a site density of 25.3dph. We consider that the density proposed through the draft allocation is relatively low, with a density of 30dph more suiting to an edge of settlement development on a market town and also ensuring that opportunities are taken to deliver a range of housing types in the most sustainable locations.

The outline planning application includes all relevant reports and surveys to ensure flood risk, heritage, ecological and archaeological impacts are fully considered and any necessary mitigation agreed with the Council and relevant consultees.

We are, however, concerned by some wording in part of the policy that states:

development proposals should connect up with the 'disused railway to the west of the site'

There is a footpath that runs along the western boundary, which the proposal connects up to, but after multiple site visits, historical researching and land registry searches, no disused railway or any reference there to, can be found. This reference should be removed from the draft allocation policy wording. The current permissive footpath that runs along the western boundary would remain, as it is outside of the red line plan and the current application allows for the relevant connects to be provided.

LP39.06

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

Comment Object

This site is allocated for 62 dwellings. Whilst there are no designated heritage assets within the site boundary, the grade II listed St Marys church lies to south of the site.

Any development of the site has the potential to impact this listed building 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 appreciate that Church Gardens has been developed between the church and the site. Development of the site should follow a similar density of development given the proximity to the church and the edge of town location.

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

LP39.07

Title:
First Name:
Surname:

Position:
Organisation: Fisher Parkinson Trust

Comment **Support**
Background

Representations regarding the site identified in red on the attached plan under the Fenland District Council's Site ID Reference 40382 (Doc 1), and relates to land owned by the Fisher Parkinson Trust. The site extends to some 15.66 ha and is situated South of Knight's End Road and West of Wimblington Road, March. The site benefits from having the most substantial road frontage to Wimblington Road.

The site hugs the built-up area with plenty of visually well-contained mature landscape features. This is a prime allocation for new housing development within a sustainable location that is supported by planning policy.

Housing Allocations

- 2013 'Broad Locations for Growth'
- March Neighbourhood Plan (March South West - around 500 dwellings).
- Identified as Residential (LP39) on Draft Policies Map (August 2022) March (Inset 16) *
- Draft policies LP39.03 and 39.04 specifically to the Trust's land *

Promotion through the Local Plan process

Since 2012, the Fisher Parkinson Trust has promoted the site for housing development. This has involved regular meetings over a number of years with the relevant landowners.

Throughout this process, the Trustees furnished the Council with all relevant information and representations as part of the emerging Local Plan process.

There are significant costs for promotion which cannot be justified without the achievement of a formal allocation being the end goal. Scope exists for the Trust to work with other landowners and as a consequence, supports Policies LP39.07 and 39.10*. The site continues to attract serious interest from major house builders.

Conclusions

The scale of the proposed housing is substantial, with the result that deliverability is unlikely to be constrained by major infrastructure obligations.

This site is available and deliverable for housing development.

* Extract from "Fenland Local Plan 2021 - 2040. Draft Local Plan Consultation August 2022'

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

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

Surname: Mack

Comment **Neutral**

This site is for 48 dwellings. There are no designated heritage assets within the site or nearby. No comments.

LP39.08

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

Comment **Neutral**

This site is for 24 dwellings. There are no designated heritage assets within the site or nearby. No comments.

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

Comment **Support**

This site is a logical extension of LP39.18 now being delivered. The allocated area reflects the part of the site within flood zone 1, The land is available and the owners are working with the developers of the adjoining land via a formal development option to deliver this site.

The proposed allocation is supported and the proposed policy criteria are noted and can be achieved

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

Comment **Neutral**

LP39.08 – Land east of Berryfield and LP46.05 – Land west side of Fenland Way

The Sites Evidence Reports for these sites indicate that over 50% of this site is in Flood Zones 2 and 3. We recommend that the policies for these site allocations state that development proposals should:

- Direct ‘more vulnerable’ development to areas at lowest risk of flooding, taking into account all sources of flood risk and the impacts of climate change.
-

Title: **Position:**
First Name: Trevor **Organisation:**
Surname: Watson

Comment **Object**

This proposed housing allocation would create a further visual intrusion into the open countryside, which along with the proposed housing allocation, LP39.02 (Land North of Estover Road), would create a major visual intrusion into the open countryside, and could not be considered as forming part of the existing built form of the town.

It would be to the detriment to the character and appearance of the area and would therefore fail to make a positive contribution to local distinctiveness and character or enhance its local setting.

This area should therefore be deleted from the Draft Local Plan.

Title:		Position:
First Name:	Michael	Organisation:
Surname:	Rutter	

Comment Object

Land East of Berryfield.
FDC's own Refusal Decisions and their Rationale have made it clear that any development in this area, which includes this site, would be an intrusion to the countryside and does not comply with FDC's Sustainability Appraisal.
This site also falls within the limits of the Secretary of State Inspector's decision on "Local landscapes" & "Permanent loss of countryside".
This site should also be deleted from the Local Plan.

LP39.09

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

Comment **Neutral**

This site is for 19 dwellings. There are no designated heritage assets within the site or nearby. No comments.

Title: Mrs **Position:**
First Name: Sara **Organisation:** Cambridgeshire County Council
Surname: Anderson

Comment **Object**

Cambridgeshire County Council, as landowner, would like to withdraw the site known as Hereward Hall, March (SHELAA Ref: 40315) which has been proposed for allocation (Ref: LP39.09) in the Emerging Fenland District Council Local Plan. This is due to the changing operational requirements of the County Council.

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

Comment **Object**

These sites are owned or controlled by county council (to the best of my knowledge) who have the same obligation to provide open space and equally know that there is insufficient provided in the town of March. These sites have repeatedly been developed and reduced in size throughout a period of knowing there is a deficiency in open space. These sites have been progressively closed off from the public and then developed. They are now appear to be using the developer name of This Land to hide behind to make out that they are not the ones developing. in fact before lock down they had a consultation at the March Library and I was specifically told that the County Council had no involvement in the projects at either the former council depot or the Hereward hall site. I appreciate that they may be short on funding and have a need to provide housing however robbing one policy to feed another creating over development is not a sound solution. The County Council should be seen to support the Fenland District Council Local Plan in a sustainable way not in a way that will just roll the problem over to another generation. (By the way, why have the County Council not cleared up their own pollution at the former Council Depot rather than trying to saddle a future developer with the problem? Anyone else doing the same (leaving a polluted site for in excess of a quarter of a century) would have had some sort of environmental enforcement action taken against them).

LP39.10

Title:
Position:
First Name:
Organisation: Fisher Parkinson Trust
Surname:

Comment **Support**
Background

Representations regarding the site identified in red on the attached plan under the Fenland District Council's Site ID Reference 40382 (Doc 1), and relates to land owned by the Fisher Parkinson Trust. The site extends to some 15.66 ha and is situated South of Knight's End Road and West of Wimblington Road, March. The site benefits from having the most substantial road frontage to Wimblington Road.

The site hugs the built-up area with plenty of visually well-contained mature landscape features. This is a prime allocation for new housing development within a sustainable location that is supported by planning policy.

Housing Allocations

- 2013 'Broad Locations for Growth'
- March Neighbourhood Plan (March South West - around 500 dwellings).
- Identified as Residential (LP39) on Draft Policies Map (August 2022) March (Inset 16) *
- Draft policies LP39.03 and 39.04 specifically to the Trust's land *

Promotion through the Local Plan process

Since 2012, the Fisher Parkinson Trust has promoted the site for housing development. This has involved regular meetings over a number of years with the relevant landowners.

Throughout this process, the Trustees furnished the Council with all relevant information and representations as part of the emerging Local Plan process.

There are significant costs for promotion which cannot be justified without the achievement of a formal allocation being the end goal. Scope exists for the Trust to work with other landowners and as a consequence, supports Policies LP39.07 and 39.10*. The site continues to attract serious interest from major house builders.

Conclusions

The scale of the proposed housing is substantial, with the result that deliverability is unlikely to be constrained by major infrastructure obligations.

This site is available and deliverable for housing development.

* Extract from "Fenland Local Plan 2021 - 2040. Draft Local Plan Consultation August 2022'

Title: Ms **Position:** Historic Environment Planning Adviser
First Name: Debbie **Organisation:** Historic England
Surname: Mack
Comment **Neutral**
This site is for 18 dwellings. There are no designated heritage assets within the site or nearby. No comments.

LP39.10

Title:

Position:

First Name: Y

Organisation:

Surname: Payne

Comment

Object

LP39.10 butts onto the backs of established housing on Wimblington Road as does LP39.03 butts onto housing on Knights End Road. The solution is to leave a reasonable strip of open land between the new and the old developments to allow for clean air to counter pollution from busy road traffic. To allow for wildlife, nature corridors and the peoples mental health. To avoid so much environmental heating around the properties

- 1.Any new developments should be built within the established boundaries of trees and hedgerows to protect the present natural wildlife in these areas. pulling down and replacing these habitats elsewhere is not appropriate.
 - 2.New developments should not butt up to existing properties but there should be a reasonable strip of open land surrounding the new development. This would allow the habitat and corridor for wildlife to exist while helping residents mental feeling of well being.
 3. Open land should be left surrounding new developments to help reduce the effects of increased pollution from increased traffic (Wimblington road is already very heavy from lorries, farm vehicles, buses and much more). To reduce the effects from increases household fuels for heating etc.
 - 4.Open land should be left surrounding new developments to help reduce the impact on the surrounding properties from the increased heating of the local environment due to extra buildings, concrete, bricks, mortar, tarmac etc.
 - 5.Is the loss of farmland a sensible idea when recently it has been shown the need in this country to grow more of our own food.
 6. Land west of Wimblington Road is home to a lot of important wildlife and plants. Bats, Hedgehogs, Woodpeckers, Owls, Raptors, Foxes, Deer, squirrels, a number of butterflies, moths, bees, wild plants. Do we want to disturb and maybe even lose these???
-

LP39.11

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

Comment **Neutral**

This site is for 9 dwellings. There are no designated heritage assets within the site or nearby. No comments.

LP39.12

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

Comment **Neutral**

This site is for 8 dwellings. There are no designated heritage assets within the site or nearby. No comments.

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

Comment **Support**

The proposed allocation represents infilling within an otherwise developed frontage and reflects the form of the proposals previously submitted on behalf of the owners. The site is available and will be brought forward for delivery at an early stage within the plan period. The site is entirely within Flood Zone 1. Other evidence supporting the development of the site was advanced in the previous planning application.

As such on behalf of the site owners the draft allocation is supported.

LP39.13

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

Comment **Neutral**

This site is for 6 dwellings. There are no designated heritage assets within the site or nearby. No comments.

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

Comment **Support**

Land at Queen's Street Close Car Park, March. SHEELA Ref: 40316

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.

March is identified as a Market Town in the settlement hierarchy (Policy LP1) and as such a suitable location to accommodate additional housing allocations. Furthermore, it is located in the south of the district making development more viable with a realistic proposition of delivering both market and affordable housing. Not only are market towns a focus for housing development but also a focus for infrastructure investment. It is therefore considered that as a largest Market Town at the top of the settlement hierarchy, March accommodate as many allocations as possible. Accordingly the County Council supports the allocation of this site. If, The Site has been allocated as under Policy LP39.13:

An extract of the Policy 39.01 is set out below. It identifies that the site extends to 0.17 ha and could potentially deliver six dwellings. This is considered to be a reasonable assessment of the site's potential capacity, although if it were developed to accommodate a flatted scheme possibly a slightly higher number of units could be delivered.

This particular site represents a highly sustainable brownfield location, being within walking distance of the centre of March. 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. March is the largest Market Town and at the top of the settlement hierarchy. It is also in the more viable south of the district and as such able to deliver both market and affordable housing. Accordingly, every opportunity to include suitable allocations should be taken.

The Site is centrally located with excellent access to existing services and facilities. 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 LP39 of the draft Local Plan.

Title:**Position:****First Name:** Andrew**Organisation:****Surname:** Hammond**Comment****Object**

These sites are owned or controlled by county council (to the best of my knowledge) who have the same obligation to provide open space and equally know that there is insufficient provided in the town of March. These sites have repeatedly been developed and reduced in size throughout a period of knowing there is a deficiency in open space. These sites have been progressively closed off from the public and then developed. They are now appear to be using the developer name of This Land to hide behind to make out that they are not the ones developing. in fact before lock down they had a consultation at the March Library and I was specifically told that the County Council had no involvement in the projects at either the former council depot or the Hereward hall site. I appreciate that they may be short on funding and have a need to provide housing however robbing one policy to feed another creating over development is not a sound solution. The County Council should be seen to support the Fenland District Council Local Plan in a sustainable way not in a way that will just roll the problem over to another generation. (By the way, why have the County Council not cleared up their own pollution at the former Council Depot rather than trying to saddle a future developer with the problem? Anyone else doing the same (leaving a polluted site for in excess of a quarter of a century) would have had some sort of environmental enforcement action taken against them).

Title:

Position:

First Name: Andrew

Organisation:

Surname: Hammond

Comment

Object

These sites are owned or controlled by county council (to the best of my knowledge) who have the same obligation to provide open space and equally know that there is insufficient provided in the town of March. These sites have repeatedly been developed and reduced in size throughout a period of knowing there is a deficiency in open space. These sites have been progressively closed off from the public and then developed. They are now appear to be using the developer name of This Land to hide behind to make out that they are not the ones developing. in fact before lock down they had a consultation at the March Library and I was specifically told that the County Council had no involvement in the projects at either the former council depot or the Hereward hall site. I appreciate that they may be short on funding and have a need to provide housing however robbing one policy to feed another creating over development is not a sound solution. The County Council should be seen to support the Fenland District Council Local Plan in a sustainable way not in a way that will just roll the problem over to another generation. (By the way, why have the County Council not cleared up their own pollution at the former Council Depot rather than trying to saddle a future developer with the problem? Anyone else doing the same (leaving a polluted site for in excess of a quarter of a century) would have had some sort of environmental enforcement action taken against them).

Title:**Position:****First Name:** Andrew**Organisation:****Surname:** Hammond**Comment****Object**

These sites are owned or controlled by county council (to the best of my knowledge) who have the same obligation to provide open space and equally know that there is insufficient provided in the town of March. These sites have repeatedly been developed and reduced in size throughout a period of knowing there is a deficiency in open space. These sites have been progressively closed off from the public and then developed. They are now appear to be using the developer name of This Land to hide behind to make out that they are not the ones developing. in fact before lock down they had a consultation at the March Library and I was specifically told that the County Council had no involvement in the projects at either the former council depot or the Hereward hall site. I appreciate that they may be short on funding and have a need to provide housing however robbing one policy to feed another creating over development is not a sound solution. The County Council should be seen to support the Fenland District Council Local Plan in a sustainable way not in a way that will just roll the problem over to another generation. (By the way, why have the County Council not cleared up their own pollution at the former Council Depot rather than trying to saddle a future developer with the problem? Anyone else doing the same (leaving a polluted site for in excess of a quarter of a century) would have had some sort of environmental enforcement action taken against them).

LP39

Title:	Mr	Position:	
First Name:	Michael	Organisation:	Veris Ltd
Surname:	Mottram		

Comment **Neutral**

Please find attached a copy of the “Draft Policies Map (June 2022) March (Inset 16)” together with a more detailed map displaying land owned by Veris Limited, on both maps the land is hatched in red.

Veris Limited took over the ownership of this land in October 2021 which was too late to put the land forward for the call for sites for the next Local Development Plan.

The land offers a natural link between parcels reference LP39.03, LP39.04 and LP40.02 and so we would ask you to consider it to be included in the LDP going forward.

We are in communication with owners of these neighbouring blocks with the aim of forming a landowners agreement making the area more attractive for development.

I am writing to you on behalf of Veris Ltd to submit a land parcel for inclusion as a residential site allocation in the emerging Local Plan. Please find attached a copy of the ‘Draft Policies Map (June 2022) March (Inset 16)’ together with a more detailed map, which show the land owned by Veris Ltd hatched in red.

The land currently forms part of the ‘South-west March broad location for growth’ in the adopted Local Plan. This broad location is identified as being suitable for “predominantly residential (around 500 dwellings), but also include some business development, probably in the southern part on the west side of the B1101”.

Veris Ltd acquired the land in October 2021, thus missing the opportunity to promote the site through the Council’s previous call for sites.

The land offers a natural link between Site Allocations LP39.03, LP39.04 and LP40.02 which have been included in the Draft Local Plan. It is understood that additional land within the South-west March broad location area is also being submitted to the Regulation 18 consultation by Foster Holdings (Fenland) Ltd (see enclosed plan). Veris is involved in active and positive discussions with all of these adjoining landowners, with the aim of forming a landowners agreement.

It should also be noted that as well as a willingness of the landowners to bring the area forward as a whole, there is significant interest from a number of large housing developers who see South-west March as a great opportunity to bring much needed housing to March and the Fenland area in the immediate future.

Given that the site is in a sustainable location for growth, it is available and progressing towards a landowners agreement and with significant interest from development partners, the site should be included in the emerging Local Plan as a site allocation for residential development.

LP40: Site allocations for non-residential development in March

Title:

Position:

First Name: Richard

Organisation: Cambridge Property Group Plc

Surname: Sears

Comment **Neutral**

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

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

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

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

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

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

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

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

LP40: Site allocations for non-residential development in March

Title:

Position:

First Name: Richard

Organisation: Richard Brown Planning Limited

Surname: Brown

Comment

Object

Our client, Enterprise Property Developments Limited (hereinafter referred to as “Enterprise”), are the freehold owners of land at Melbourne Avenue March (hereinafter referred to as “the site”) which is identified on the site location plan enclosed.

The site is on the fringe of the Trading Estate and abuts and integrates with the residential dwellings (Hundred Road).

The site is well connected to public transport (buses), the site is also approximately 1.2km from March Railway Station.

Enterprise are proposing to bring forward a planning application for partly employment uses and partly residential as is indicated on the indicative layout confirming employment/residential uses.

Policy LP9 – March in the current adopted Plan (2014) with regard to March Trading Estate, the policy confirms that development should be

“predominantly or entirely related to business uses”.

Residential, or part residential uses, on the fringe of the Trading Estate are therefore, not excluded.

Object:

I object to the above referenced policy/paragraph/site because:

Our client, Enterprise Property Developments Limited (hereinafter referred to as “Enterprise”), are the freehold owners of land at Melbourne Avenue March (hereinafter referred to as “the site”) which is identified on the site location plan enclosed.

The site is on the fringe of the Trading Estate and abuts and integrates with the residential dwellings (Hundred Road).

The site is well connected to public transport (buses), the site is also approximately 1.2km from March Railway Station.

Enterprise are proposing to bring forward a planning application for partly employment uses and partly residential as is indicated on the indicative layout confirming employment/residential uses.

Policy LP9 – March in the current adopted Plan (2014) with regard to March Trading Estate, the policy confirms that development should be

“predominantly or entirely related to business uses”.

Residential, or part residential uses, on the fringe of the Trading Estate are therefore, not excluded.

Policy LP40 site allocations for non-residential development in March confirms that.

The Council have identified the Trading Estate for employment land uses.

But it is submitted that certainly on the fringe of the March Trading Estate the Policy should be appropriately worded, so as to retain flexibility to allow for some residential development (the wording as set out in the adopted Plan should be continued), so that the Policy “allows” for the provision of residential development (in part) which is shown on the attached indicative layout confirming employment/residential uses.

LP40: Site allocations for non-residential development in March

This general point relating to the Policy wording appears to be confirmed by the Council consenting a site at Wisbech Road March (F/YR16/0436/0) which is also on the fringe of the Trading Estate and, as with the site, abuts the residential area.

Title:		Position:	
First Name:	Rob	Organisation:	Savills
Surname:	Morgan		
Comment	Support		
Position of Eastwood RVL March Limited			

Our client has an interest in land known as Land to the South of March Trading Estate (hereafter referred to as ‘the site’), as identified on the Site Location Plan enclosed. The site is an irregular shaped plot of c. 7.38 hectares currently in agricultural use. It is located to the north-west of March and, more specifically, to the south of the established March Trading Estate. It is bounded by a Tesco Superstore and various commercial land uses to the north, residential development (both established and consented) to the south with the railway line between, the A141 Wisbech Road is immediately to the west with open countryside beyond. To the east is open land which is currently subject to a planning application for new employment development.

The site is well-connected to public transport. The closest bus stop is located within the Tesco Superstore forecourt, approximately 260m to the west of the site’s access onto Westry Avenue, providing bus services to March Town Centre, Wisbech, Peterborough and Ely. March Railway Station is c.1.2km to the southeast of the site providing train services on the Stansted-Cambridge-Leicester-Birmingham line. The site also has good connections to the A141 and wider road network.

Eastwood RVL March Limited is bringing forward proposals for development of the site to deliver modern, flexible workspace which will contribute a range of new employment opportunities for local people in a highly sustainable location.

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

In short, we are pleased that the Council has identified the site for employment development under Site Allocation: LP40.01, March Trading Estate and wholly support the proposed allocation. The site can deliver a significant quantum of modern, flexible and high quality employment floorspace in a sustainable location to meet the Council’s longstanding aspirations for this site, which was identified as a Broad Location for Growth in the adopted Local Plan.

Site Allocations for Non-Residential Development in March

We wholly support the site’s allocation for non-residential development set out under Policy LP40 and Site Allocation LP40.01 ‘March Trading Estate’. The allocation builds on the current Broad Location for Growth allocation in the adopted Local Plan and secures the opportunity for the site and wider area to deliver a significant quantum of new employment floor space as a logical extension to the existing March Trading Estate.

LP40: Site allocations for non-residential development in March

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

Comment **Object**

Allocations LP40.01 and LP40.07 fall within the Consultation Area for March Landfill Waste Management Area (WMA), Lions Yard WMA, Whitemoor Rail Depot WMA, and Whitemoor Rail Sidings Transport Infrastructure Area (TIA). Development will need to ensure that at it does not prejudice the ongoing use of safeguarded sites as per Policy 16 of the MWLP.

Allocation LP40.01 includes proposals for Use Class E uses. This Use Class is unlikely to be acceptable in proximity to the safeguarded waste management facilities (see comments on LP15)
The Lions Yard WMA falls within Allocation LP40.01. Policy LP40 should demonstrate how the Lions Yard facility will be retained or relocated.

Title: **Position:**
First Name: Liz **Organisation:** ICIS consulting limited
Surname: Dent

Comment **Neutral**

Correction required:
LP40.05, SHELAA: 40290 Site, Name: Westry Retail Park
Permitted use is noted as A3 Restaurants & Cafes.
Proposed correction: The Permitted Use should be corrected as it is primarily for Retail development (E(a)) with ancillary use (E(b)) Cafes & Restaurants.

LP40: Site allocations for non-residential development in March

Title:	Mr	Position:	
First Name:	Lee	Organisation:	L Bevens Associates Architects Ltd
Surname:	Bevens		

Comment Object

Further to my response yesterday i would like to add further points in support of the above site for inclusion in the Local Plan.

The site is relatively close to the new primary and nursery at New Road, School in Whittlesey and the PROW/SUSTRANS route 63 to the south of the application site would provide children and parents with a safe, sustainable route to access the school, without the need to take vehicles out onto the A605 to the north. As previously mentioned, this route is over 91% asphalt surface and would be a great opportunity to make more use of it.

I understand that there are enquiries to promote a Science Park at Saxon Pits together with small industrial and start up business units at Churchfield Farm. These proposals will require a choice of local, new housing to support the likely new employment created and this site will provide that, again with the PROW/SUSTRANS route to allow a sustainable mode of getting to the sites.

We the recent decision by Anglia Water to provide a new reservoir between Chatteris and Doddington there is a greater opportunity to provide growth in the district. This reservoir will be a huge benefit to the area, both with tourism, jobs and more people wishing to move in the district. We need to provide housing in the area to support this and ensure that the new Local Plan allows the flexibility for that growth. This site will provide that.

LP40.01

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 Marys church lies to west of the site.

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

Whilst there is mention of planting and landscaping to protect amenity of dwellings to north west, there is no mention of the church to the west. We suggest that appropriate landscaping should be provided along western boundary to protect and enhance the setting of the church.

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

Amend policy to state that landscaping should be provided along western boundary to protect and enhance the setting of the church.

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

Comment Neutral

LP40.01 March Trading Estate
As this site is already an existing employment area, there are Anglian Water network assets within the site allocation boundary (see previous note above regarding appropriate policy wording).

LP40.01

Title:

Position:

First Name: Richard

Organisation: Richard Brown Planning Limited

Surname: Brown

Comment Support

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

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

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

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

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

Support:

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

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

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

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

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

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

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

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

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

LP40.01

extension to the March Trading Estate.

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

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

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

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

LP40.02

Title: Mr **Position:**
First Name: Michael **Organisation:** Veris Ltd
Surname: Mottram

Comment **Support**

LP39.03/ LP39.04/ LP40.02

The above site allocations are supported. Land owned by Veris Ltd shown on the attached plans should also be included as a site allocation for residential development in the Local Plan for the reasons set out in the attached covering letter.

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

Comment **Neutral**

There are no designated heritage assets within the site or nearby. No comments.

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

Comment **Support**

Brown & Co have been instructed to submit the following representation regarding the Fenland Local Plan 2021-2040 Draft Local Plan Consultation August 2022 on behalf of our client Mr and Mrs J Mair (landowner) in respect of the Land to the North-West of The Mill Hill Roundabout, March

In the Fenland Local Plan 2021-2040 Draft Local Plan (DLP) it is noted Policy LP40 sets out site allocations for non-residential development in March and the Land to the north-west of the Mill Hill Roundabout is proposed for allocation, under site allocation LP40.02, SHELAA site ref: 40351 which is supported. The site is identified on the Draft Policies Map (August 2022) March (Inset 16) as policy LP40.02 for employment/ non-residential

development (LP40). We support the allocation of this site to include a mix of employment uses, such as uses within classes B and E(g) with a new access from the A141 and/or via adjacent site allocation. The site can provide appropriate landscaping and planting to reduce the visual impact on the landscape and provide walking routes which connect to March Public Byway No. 22 located to the east of the site which connects through to Knight's End Road to the north and to March.

We agree and support the Council's assessment on page 50 of the Fenland District Council Draft Local Plan – Site Evidence Report (Part D) (August 2022) that sets out the site is well located, to the south of the existing Local Plan 2014 allocation, the South West March Broad Local for Growth (40006). The site forms part of a wider cluster of sites located towards the south of March and when assessed as a group we support the Council's assessment that the site provides a suitable location for development. We agree that the allocation of this site towards the south of March is in accordance with the Council's growth strategy which will deliver proportionate growth across settlements at deliverable sites.

LP40.03

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

Comment **Neutral**

There are no designated heritage assets within the site or nearby. No comments.

LP40.04

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

Comment **Neutral**

There are no designated heritage assets within the site or nearby. No comments.

LP40.05

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

LP40.07

Title:		Position:	
First Name:	Elizabeth	Organisation:	
Surname:	Whitehouse		

Comment **Neutral**

Allocated as Primary Shopping Area, yet this is B8 Warehousing and distrubution. Is this area intended to be re-allocated to shopping?

LP41: Land north of Knight's End Road and East of the A141

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

Comment	Object
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LP41: Land north of Knight's End Road and East of the A141 (site allocation LP39.01)

The policy states that the site has the opportunity for the development 1,200 new dwellings. As already referred to in our comments at Policy LP39, Persimmon Homes question why the extent of the allocation has been reduced in size, particularly as parcels proposed to be excluded from the allocation are now coming forward via planning application. Please refer to the detailed comments made by Persimmon Homes in relation to Policy LP39.

The policy refers to the inclusion of employment uses. It is important to stress that the Broad Concept Plan which has been approved by Fenland District Council defines the land uses for the wider allocation and this does not include any employment uses. Furthermore, no evidence has been presented by the council for employment uses on the site. For these reasons, Persimmon Homes are of the view that the reference to employment uses should be removed from the policy.

This policy sets out the required infrastructure provision that is required for the site, however this has been set out before the Council's Infrastructure Development Plan has been updated (the current Infrastructure Development Plan dates back to 2016) and as such there is no up to base evidence to justify this policy. The Infrastructure Delivery Plan needs to be updated and consulted on as part of the review of this Local Plan.

In terms of the provision of a new primary school, Persimmon Homes have been in discussion with Fenland District Council as part of our current planning application (F/YR21/1497/O) and it has been confirmed that the primary school provision will comprise land which will be transferred for the provision of a primary school. The wording of this policy should be amended to reflect these discussions.

As part of the evidence base to the Local Plan Review, Persimmon Homes would expect that the Local Authority would have undertaken an audit of the existing local community infrastructure. Having reviewed the evidence base that supports the Local Plan review, no such Audit appears to have been undertaken and this needs to be done and consulted on as part of the local plan review.

A Broad Concept Plan for West March (covering the previous allocation for around 2,000 dwellings) was produced by Persimmon Homes and approved by Fenland District Council in July 2021. This Broad Concept Plan provided for the necessary links as set out in this element of the policy.

Persimmon Homes also have a current outline planning application pending consideration with Fenland District Council (F/YR21/1497/O) which addresses all of these matters. The application is supported by a Masterplan and a suite of Parameter Plans which demonstrate how the development relates to the strategic and local highway networks and provide for pedestrian and cycle links to the town centre, Neale Wade Academy, adjoining neighbourhoods, and existing public rights of way.

Given the size of the allocation, it would be expected that future applications would need to be supported by a Transport Assessment.

The wording of this policy comes from the 2014 allocation policy, but applies more specifically to those parcels of the original allocation that are closer to the church/ listed buildings. By the exclusion of those parcels from the draft allocation this criteria cannot be applied to those parcels when development comes forward. Hence the allocation should revert back to the larger site area.

The approved Broad Concept Plan and Persimmon Homes current outline planning application for up to 1,200 dwellings (planning reference F/YR21/1497/O) include archaeological evaluation.

LP41: Land north of Knight's End Road and East of the A141

The approved Broad Concept Plan and Persimmon Homes current outline planning application for up to 1,200 dwellings (planning reference F/YR21/1497/O) include these measures.

The objective of this element of the policy is to protect the character of the countryside by providing a gentle transition from the built environment to the countryside. The western boundary of the allocation site abuts the open countryside and Persimmon recognise the need for landscape planting along this boundary, and this is provided for within the Broad Concept Plan and the Masterplan and Parameter Plans submitted with our outline planning application F/YR21/1497/O. However, the southern boudnary of the allocation sites abuts the established built environment of dwellings along Knight’s End Road. Therefore the purpose of providing landscaping along this boudnary to create a general transition from the built area to countryside is not understood. Furthermore, the need for landscaping along this southern boudnary is not required as part of the Broad Concept Plan which is an approved document. For these reasons, reference to the southern boundary should be removed from this policy.

The SFRA Level 2 Assessment is not included in the Council’s Evidence Base or available on the Council’s website, although the Level 1 Assessment is (dated June 2022) is. The SFRA Level 2 Assessment needs to form part of the Council’s evidence base so the full implications of this part of the policy can be considered.

(See attachments for response including Draft Local Plan policy text)

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

Comment	Object
Policy LP41: Land north of Knight’s End Road & East of the A141	

Insufficient recognition is given to EEAST as an essential social infrastructure provider impacted by this housing allocation – which envisages a strategic level of new growth, e.g. 1,200 dwellings/ 2,760 population.

Change Requested

In paragraph 3 of Policy LP41 reference ought to be made to the key infrastructure scoping role played by the essential service providers such as the health care commissioners and EEAST

Paragraph 3 to read . . . The precise nature of community facilities should be informed by consultation with the local community, and an audit of existing local infrastructure in partnership with key service providers such as the health care commissioners and the East of England Ambulance Service NHS Trust . . .

LP41: Land north of Knight's End Road and East of the A141

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

Comment Object

See comments on site allocation 39.01 above.

We welcome paragraphs 6 and 7.

However, we continue to recommend that the policy should be informed by an HIA (see advice above).

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

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

Comment Object

The plan of the proposed allocation of the west March area does not reflect the land under Persimmons option or the extent of the application submitted in respect of the open space area in the North West Corner. The plan requires updating to include this additional area.

Given this allocation is part of the wider West March area and it is intended to expand eastwards in due course it is essential that Policy LP41 include as part of its criteria that suitable arrangements should be included to enable access and service provision to the land east of the allocation, to enable proper development of that area in due course. These should include such access and services being constructed to the allocation site boundary and of a scale and capacity to facilitate further development in due course. There are no such provisions currently within LP41 and the policy wording should be amended to enable the approved ,masterplan for the whole area to be implemented, and development of adjoining land not sterilized by lack of future proofing.

LP42: Whittlesey - A Market Town fit for the Future

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

Comment **Support**

We broadly support proposals to improve the historic local environment. The detailed proposals in the Whittlesey transport Strategy will be subject to separate more detailed scrutiny. Any transport proposals will need to ensure that careful consideration is given to the historic environment.

LP42: Whittlesey - A Market Town fit for the Future

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

Comment Object

We object to the limited scale of allocations in Whittlesey. The allocations are based on the extant planning permissions and a minimal number of allocations. The growth target for the settlement is based on the sum of commitments and allocations, and is not based on an assessment of need. As such the growth target represents a lower level of growth than that identified in evidence supporting the Whittlesey Neighbourhood Plan, which is currently undergoing examination (The Whittlesey Town Council Housing Needs Assessment).

More sites should be allocated in the settlement to meet the housing need identified in the Whittlesey Town Council Housing Needs Assessment and sites selected in line with Neighbourhood Plan Policy 1B which identified land to the East of Whittlesey as the preferred location for growth, in advance of other sites to the north of Whittlesey, or around Coates.

We object to the exclusion of our client's land from the list of allocations in Whittlesey (SHELAA site reference 40237). The analysis of sites appears to be flawed in the site assessment, resulting in an inaccurate picture of the suitability of the site.

The Draft Local Plan – sites evidence report (part D) rejects the site because:

- Development would take place in the open countryside
- Development would erode an important gap between Whittlesey and Eastrea, and
- Development would be “relatively distant from some services”.

We consider all three conclusions are flawed for the following reasons.

Development would take place in the open countryside

The assessment does not take into consideration the ongoing and existing development around the site, which is also enclosed by Drybread Road to the east and north. Substantial residential developments are underway on the allocated sites to the west, and south-west of the site, and on sites with planning permission proposed as allocations to the south of the site. The development to the south of the site includes a new supermarket adjacent to the A B Texel development on the road towards Eastrea. There is an existing strip of ribbon development on the Eastrea Road site frontage.

From all directions, the site is contained by existing development to the west and south, including development along the Eastrea Road frontage and the Decoy Farm Fishing Lakes to the north east. Development would in effect infill an area contained by the developed footprint of Whittlesey. Development of the site will not represent a significant intrusion into the open countryside. The site is viewed against the backdrop of established and ongoing development from all meaningful viewpoints and, as such, the impact of development on the surrounding countryside would be limited.

Views of the site from the north are limited by the Decoy farm fishing lakes and the wooded Bassenhally Pit Site of Special Scientific Interest. The visual impact of the site is limited to the site and its immediate surroundings, and is not visually prominent in the longer distance.

Development would erode an important gap between Whittlesey and Eastrea

The claim that the site occupies an important gap between Whittlesey and Eastrea is also difficult to support. The site frontage along Eastrea Road is largely occupied by existing development. The limited open frontage between the new development to the west and the existing frontage development offers only a limited visual break between the settlements. The experience of the break is further constrained by the ongoing residential and retail development being delivered to the south of Eastrea Road, the most recent permitted development, which is now being delivered, includes over 200 houses and a supermarket, in addition to the substantial residential development underway on the

LP42: Whittlesey - A Market Town fit for the Future

Strategic Development site allocated in the adopted local plan. All the development to the south emphasises the extension of Whittlesey further eastwards than the extent of site 40237, linking, as it does, to the existing commercial property of A B Texel.

The limited nature of the proposed gap is demonstrated by the fact the draft local plan, as originally prepared to be presented to Cabinet in May 2022, included the small area of land as “Frontage Development Area” under part C of Policy LP1: settlement hierarchy, which would allow residential development. Although the Frontage Development Area was removed in the plan submitted to Cabinet in June 2022, the reason for the change in drafting was not provided. We can only assume this decision was because the site could accommodate more than three dwellings, the upper limit for development in “Frontage Development Areas”.

We also note the Whittlesey Neighbourhood Plan promotes a buffer between Whittlesey and Eastrea, with the western boundary formed by Drybread Road, excluding our client’s land(site 40237). The Neighbourhood Plan includes a definition of the gap between Whittlesey and Eastrea, unlike the Local Plan, which fails to explore the nature of the gap between the two settlements.

We note the Neighbourhood Plan also promotes development to the east of Whittlesey north and south of Eastrea Road, including site 40237. Allocating this site would deliver homes in a sustainable location than other allocated sites, specifically those other sites (e.g. 40265 and 40328) which have less favourable assessments in the SHELAA than this site. This preference has also been ignored in the preparation of the Draft Local Plan Development would be “relatively distant from some services

We are not sure what “relatively distant from some services” means. By the very nature of towns, services are provided in different locations and access to different services will vary across the town. Not all locations will have equal access to all services. The land to the north of Eastrea Road is accessible to the town center, being 1.5km away, the secondary school (Sir Harry Smith Community College) is closer than the town centre and the and the two primary schools (Alderman Jacobs and New Road Primary Schools) are both within convenient walking distance of less than 1.5km of the site. A new supermarket is also being built to the south of Eastrea Road. The distance from services is, therefore, not an issue, being comparable to other parts of the town, and, particularly in relation to the new supermarket, better than many.

In conclusion the reasons given for not allocating the site do not appear valid:

The site is enclosed by development and, as such, despite its size, would be infilling vacant land enclosed by Whittlesey, and will have limited impact on the open countryside.

The site, due to development on the site frontage, does not present a gap between Whittlesey and Eastrea, an opinion shared by the Whittlesey Neighbourhood Plan, which defines the buffer between the settlements as lying to the east of Drybread Road

The site is easily accessible to many of the services of Whittlesey. We have updated the material originally submitted to promote the site in the SHELAA process to reflect the more recent Planning Permissions in the area and ongoing developments. (Please see enclosed document – Supporting Statement to Policy LP42- Site Allocations in Whittlesey)

The site, which is in a location preferred for Growth in the Whittlesey Neighbourhood Plan, should be allocated to meet the growth targets for Whittlesey identified in the Housing Need Assessment prepared to support the Neighbourhood Plan, which is the only rigorous assessment of Needs of the Whittlesey area.

See supporting ststament for site 40237

LP42: Whittlesey - A Market Town fit for the Future

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

These policies must include protection of existing sports facilities, improvement of existing facilities, and provision for additional facilities where needed.

LP43: Residential site allocations in Whittlesey

Title:

Position:

First Name: M J

Organisation:

Surname: Hawkins

Comment Object

The large areas identified for housing 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 be 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 for 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: John

Organisation: Maxey Grounds

Surname: Maxey

Comment Object

We object to the rejection of site reference 40348 East of Drybread Road Whittlesey for allocation. Contrary to the conclusions of the evidence report, the site represents a logical rounding off of development being undertaken within the Allison Homes development as part of LP43.03, with an opportunity to mirror development on the west side of Drybread Road, , in terms of northern extent, with appropriate landscaping to the northern edge of the site to mitigate visual affect on the countryside.

It is noted that the site has scored a C in the assessment – a level at which some sites that have been allocated (eg LP35.01). This site should be reconsidered at this stage, given the allocation adjoining is likely to all be delivered in the early part of the plan period.

The land owners are working with Allison Homes on proposals for such an extension, the land is available and deliverable if allocated, which we propose.

LP43: Residential site allocations in Whittlesey

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

Comment	Object
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Drybread Road, Whittlesey, Site Representation (SHELA REF 40348)

Allison Homes anticipates that an outline application for 190 dwellings will be submitted in October 2022. This site offers a logical extension to the current developments at Bassenhally Farm to the south, which is currently being built out by Allison Homes. The site has limited development constraints and is not located in flood zones 2 or 3; which is a common constraint in Whittlesey and one which can impact greatly on deliverability.

The site does not span any further eastwards than the allocated site at Bassenhally Farm to the south and is well contained by Drybread Road bordering to the north and west. Despite this, the site is located outside the settlement boundary of Whittlesey in the Emerging Local Plan's policy map. However, we believe that the site should be included in the settlement boundary, given that there would be limited negative impact and intrusion into the open countryside, by virtue of the location and context of the site, and in relation to the existing urban form of the settlement of Whittlesey.

From the ecology report undertaken in September 2022, the central part of the site offers low ecological value and the development will look to enhance existing habitats. Hedgerows and ditches surrounding the northern and western boundaries also offer low ecological value, and there is opportunity for the proposal to enhance this through appropriate landscaping and planting. Further surveys will be completed, if required through the planning application process.

It is noted that the site is located in the Goose and Swan Functional Land, and as such, a non-breeding bird survey may be advantageous, to ensure the development has no adverse impacts on ecology. This would be submitted as part of the Reserved Matters.

The site will contain a policy compliant provision of open space which will be found at the north of the site and will also act as wetlands/SUDs to mitigate surface water flooding impacts. The development will also provide cycleway and footway connectivity to encourage the use of sustainable transport, as stated in Policy LP20.

The site and its development will ensure that FDC has a continuous supply of housing for a rolling 5yr period and the additional benefits of affordable housing provision will help maintain the Housing balance.

LP43: Residential site allocations in Whittlesey

Title:	Mr	Position:	
First Name:	Lee	Organisation:	L Bevens Associates Architects Ltd
Surname:	Bevens		
Comment	Object		

This site should be further considered in the local plan. The site DOES NOT adjoin and DOES NOT have a County Wildlife Site within it and this is false information. I suggest that this is removed from 16a.(ii). It is a small spinney outside of the site boundary that DOES NOT have public right of way to it. It is currently private land owned by Mr White. The site lies adjacent to a Sustrans route (Number 63) along the southern boundary and therefore does connect to a PROW. This route runs from Wisbech to Leicester! Check the maps. The site has been put forward as a mixed-use site with the opportunity to provide housing and community use/employment. There is scope to provide a doctor's surgery and/or primary school is required to overcome concerns about proximity to services. Impact on the adverse harm to local character is a subjective matter and any development that extends a village boundary can be seen as that. This site has the opportunity to provide bio-diversity benefits with surface water areas being contained on the site and the impact reduced by intelligent use of landscaping and land levels. A footpath could relatively easily be installed along Wype Road to encourage pedestrian routes back into the village and with recent nearby development would not relate poorly to the built form and we would ask that this site is re-considered. Additional photographs can be provided

LP43.01

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

LP43.02

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

LP44: Site allocations for non-residential development in Whittlesey

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

Comment **Neutral**

Proposed Employment Allocation – see attached plan.

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

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

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

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

LP44: Site allocations for non-residential development in Whittlesey

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

Comment Support

These representations are made on behalf of King's Dyke Business Park Ltd, who is delivering the sites identified as allocations LP44.01 and LP44.02 by Policy LP44. The identification of LP44.02 as an existing site for major employment development is supported. Outline planning permission (all matters reserved except access) was granted in December 2020 for up to 7,432 sqm of B1 and B8 uses (F/YR20/0357/O). The site is located to the north of the new King's Dyke crossing bypass (Ralph Butcher Causeway), and will enable the revitalisation of vacant brownfield land. The applicant has been progressing detailed design of the scheme in order to submit the next stage of reserved matters by the end of 2023 as required by the outline planning permission. It is confirmed that the applicant remains committed to delivering this employment site and thereby providing economic benefits for the local area and the wider District. There is the potential for the site to provide a variety of other uses from within Class E that would be appropriate for the site. It is suggested that Policy LP44 should recognise that, subject to the grant of further planning permission, sites with extant permission could be found appropriate to deliver additional employment uses.

The draft Local Plan states a site area of 11ha for LP44.02. It should be noted that the site granted planning permission actually has a site area of 2.39ha. There is also a slight inaccuracy in the site area illustrated on the policy map. The site as granted permission extends further in the south-east – please see approved site location plan below for comparison with the policy map. For accuracy, the site area in Policy LP44 and the site as shown on the policy map should be updated to match the site that has planning permission.

The allocation of LP44.01 is also supported. The allocation is a continuance of Policy LP11 of the current adopted Local Plan, which identifies support for employment uses located west of Whittlesey along the A605 and to the north of Kings Dyke. The site lies to the south of the Ralph Butcher Causeway and is promoted by King's Dyke Business Park Ltd as 'Phase 2' of LP44.02. LP44.01 would 'round off' this area of employment land, with the King's Dyke forming a natural boundary. The site forms a natural expansion of the Peterborough Road Established Employment Area (EEA) which borders to the north and encompasses LP44.02. Table 5 of the draft Local Plan notes that this EEA contains a range of employment uses, from B2 and B8 to offices, retail and waste disposal.

The following comments are made on the proposed wording of Policy LP44, relating to site allocation LP44.01. The proposed wording is replicated in italics below, any suggested amends to the wording is noted in red text:

Development proposals should provide:

- Include a mix of employment uses, such as uses within classes B and E(g), and Sui Generis uses appropriate to the location;

The general thrust of this criterion that a range of employment uses would be supported on the site in principle is strongly supported by King's Dyke Business Park Ltd. However, the policy does not currently take into account the suitability of the site to provide not only 'traditional' employment uses falling within use classes B and E(g), but also uses within E(a) – retail, E(b) – food and drink, and appropriate Sui Generis uses such as petrol filling stations or drive through food takeaways. These are broad use classes, with the type of business that can be provided under each use differing.

While these additional uses would technically fall within the definition of 'main town centre

LP44: Site allocations for non-residential development in Whittlesey

use', the site is a more than appropriate location for businesses that directly benefit from passing traffic – such as drive through restaurants or trade counter uses. Such uses would be appropriate for the site as they would not draw custom away from the town centre and would be suitable to the context of the site and existing employment uses. Creating greater flexibility in the policy wording on the suitable uses that are expected on the site would also help ensure the long-term viability of the site.

Policy LP16 provides the control needed by the Authority to ensure only appropriate uses would be accepted on the site. The Retail Impact Assessment test required by Policy LP16 will ensure only businesses that do not affect the vitality of the town centre are granted planning permission.

- Provide a suitable access from bypass, and footway and cycleway connections;

This criterion is agreed. The design of the Ralph Butcher Causeway allows for a new access to be taken from the roundabout to serve LP44.01.

- Investigate potential for contaminated land and provide remediation where necessary;

This criterion is agreed. It should be noted that contamination investigation has already been undertaken of this site, and King's Dyke Business Park is fully aware of potential mitigation work that may be required.

Proposals should be accompanied by an assessment of Flood Risk, which reflects the recommendations of the SFRA Level 2 assessment; and

This criterion is noted. The majority of the site falls within an area benefiting from flood defences, and any scheme would be designed to take into account recommendations of the Flood Risk Assessment if necessary.

- Significant compensation measures to achieve biodiversity net gain.

This criterion is not considered necessary. Policy LP25 secures the provision of at least 10% biodiversity net gain. This criterion in Policy LP44 does not accord with LP25 in not being clear on the level of net gain that will be required. In any event, a reiteration of the requirement to provide biodiversity net gain is not necessary.

The Council will require the submission of sufficient information from the applicant to enable the completion of a project-level screening exercise under the Habitats Regulations Assessment process and, if that screening concludes that full Appropriate Assessment is needed, sufficient information to enable it to complete that Appropriate Assessment. This process will need to demonstrate that the development will not have a significant adverse effect on the integrity of the Nene Washes SAC, SPA and Ramsar.

The requirement of this wording, recommended by the Habitats Regulation Assessment, is uncertain. The application for the northern site (LP44.02) was supported by a Preliminary Ecological Appraisal which covered both LP44.01 as well as LP44.02, and confirmed that development of the entire site would not have any adverse impact on the Nene Washes. During the application process, a consultation response from Natural England (attached at Appendix A) confirmed no objections to the submitted information and did not request that a Habitat Regulations Assessment be undertaken. There is therefore no need for the above text to be included within the policy, as it has been confirmed already that a HRA for the site is not needed.

Subject to the amends suggested above, King's Dyke Business Park Ltd fully supports Policy LP44. The amends are suggested to provide greater certainty and an element of flexibility that will ensure a viable employment development can be provided at any time over the lifetime of the Local Plan, while remaining appropriate development in the context of the site. We consider the site can provide great benefit by contributing to the continued enhancement of Whittlesey and maintain its future vitality by providing a range of

LP44: Site allocations for non-residential development in Whittlesey

employment opportunities and economic benefits.

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

Comment	Neutral
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Development within site allocations LP44.01 and LP44.20 are within the Consultation Area for the Must Farm MDA and Kings Dyke MAA. Development will need to ensure that at it does not prejudice the use of the port as per Policy 16 of the MWLP

LP44: Site allocations for non-residential development in Whittlesey

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

Comment Object

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

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

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

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

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

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

Footpath and cycling access will also be created through the green area to provide a sustainable means of access directly from Whittlesey Town to the main employment areas in the centre and to the west of the site. Vehicular access will be taken directly from the A605. There are currently two vehicular accesses into the site, the proposal is to close both of these and to construct a new access complete with either a priority right turn or mini roundabout, subject to agreement with Highways.

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

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

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

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

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

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

LP44: Site allocations for non-residential development in Whittlesey

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

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

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

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

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

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

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

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

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

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

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

LP44.01

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

LP44.01

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

Comment Support

These representations are made on behalf of King's Dyke Business Park Ltd, who is delivering the sites identified as allocations LP44.01 and LP44.02 by Policy LP44. The identification of LP44.02 as an existing site for major employment development is supported. Outline planning permission (all matters reserved except access) was granted in December 2020 for up to 7,432 sqm of B1 and B8 uses (F/YR20/0357/O). The site is located to the north of the new King's Dyke crossing bypass (Ralph Butcher Causeway), and will enable the revitalisation of vacant brownfield land. The applicant has been progressing detailed design of the scheme in order to submit the next stage of reserved matters by the end of 2023 as required by the outline planning permission. It is confirmed that the applicant remains committed to delivering this employment site and thereby providing economic benefits for the local area and the wider District. There is the potential for the site to provide a variety of other uses from within Class E that would be appropriate for the site. It is suggested that Policy LP44 should recognise that, subject to the grant of further planning permission, sites with extant permission could be found appropriate to deliver additional employment uses.

The draft Local Plan states a site area of 11ha for LP44.02. It should be noted that the site granted planning permission actually has a site area of 2.39ha. There is also a slight inaccuracy in the site area illustrated on the policy map. The site as granted permission extends further in the south-east – please see approved site location plan below for comparison with the policy map. For accuracy, the site area in Policy LP44 and the site as shown on the policy map should be updated to match the site that has planning permission.

The allocation of LP44.01 is also supported. The allocation is a continuance of Policy LP11 of the current adopted Local Plan, which identifies support for employment uses located west of Whittlesey along the A605 and to the north of Kings Dyke. The site lies to the south of the Ralph Butcher Causeway and is promoted by King's Dyke Business Park Ltd as 'Phase 2' of LP44.02. LP44.01 would 'round off' this area of employment land, with the King's Dyke forming a natural boundary. The site forms a natural expansion of the Peterborough Road Established Employment Area (EEA) which borders to the north and encompasses LP44.02. Table 5 of the draft Local Plan notes that this EEA contains a range of employment uses, from B2 and B8 to offices, retail and waste disposal.

The following comments are made on the proposed wording of Policy LP44, relating to site allocation LP44.01. The proposed wording is replicated in italics below, any suggested amends to the wording is noted in red text:

Development proposals should provide:

- Include a mix of employment uses, such as uses within classes B and E(g), and Sui Generis uses appropriate to the location;

The general thrust of this criterion that a range of employment uses would be supported on the site in principle is strongly supported by King's Dyke Business Park Ltd. However, the policy does not currently take into account the suitability of the site to provide not only 'traditional' employment uses falling within use classes B and E(g), but also uses within E(a) – retail, E(b) – food and drink, and appropriate Sui Generis uses such as petrol filling stations or drive through food takeaways. These are broad use classes, with the type of business that can be provided under each use differing.

While these additional uses would technically fall within the definition of 'main town centre

LP44.01

use', the site is a more than appropriate location for businesses that directly benefit from passing traffic – such as drive through restaurants or trade counter uses. Such uses would be appropriate for the site as they would not draw custom away from the town centre and would be suitable to the context of the site and existing employment uses. Creating greater flexibility in the policy wording on the suitable uses that are expected on the site would also help ensure the long-term viability of the site.

Policy LP16 provides the control needed by the Authority to ensure only appropriate uses would be accepted on the site. The Retail Impact Assessment test required by Policy LP16 will ensure only businesses that do not affect the vitality of the town centre are granted planning permission.

- Provide a suitable access from bypass, and footway and cycleway connections;

This criterion is agreed. The design of the Ralph Butcher Causeway allows for a new access to be taken from the roundabout to serve LP44.01.

- Investigate potential for contaminated land and provide remediation where necessary;

This criterion is agreed. It should be noted that contamination investigation has already been undertaken of this site, and King's Dyke Business Park is fully aware of potential mitigation work that may be required.

Proposals should be accompanied by an assessment of Flood Risk, which reflects the recommendations of the SFRA Level 2 assessment; and

This criterion is noted. The majority of the site falls within an area benefiting from flood defences, and any scheme would be designed to take into account recommendations of the Flood Risk Assessment if necessary.

- Significant compensation measures to achieve biodiversity net gain.

This criterion is not considered necessary. Policy LP25 secures the provision of at least 10% biodiversity net gain. This criterion in Policy LP44 does not accord with LP25 in not being clear on the level of net gain that will be required. In any event, a reiteration of the requirement to provide biodiversity net gain is not necessary.

The Council will require the submission of sufficient information from the applicant to enable the completion of a project-level screening exercise under the Habitats Regulations Assessment process and, if that screening concludes that full Appropriate Assessment is needed, sufficient information to enable it to complete that Appropriate Assessment. This process will need to demonstrate that the development will not have a significant adverse effect on the integrity of the Nene Washes SAC, SPA and Ramsar.

The requirement of this wording, recommended by the Habitats Regulation Assessment, is uncertain. The application for the northern site (LP44.02) was supported by a Preliminary Ecological Appraisal which covered both LP44.01 as well as LP44.02, and confirmed that development of the entire site would not have any adverse impact on the Nene Washes. During the application process, a consultation response from Natural England (attached at Appendix A) confirmed no objections to the submitted information and did not request that a Habitat Regulations Assessment be undertaken. There is therefore no need for the above text to be included within the policy, as it has been confirmed already that a HRA for the site is not needed.

Subject to the amends suggested above, King's Dyke Business Park Ltd fully supports Policy LP44. The amends are suggested to provide greater certainty and an element of flexibility that will ensure a viable employment development can be provided at any time over the lifetime of the Local Plan, while remaining appropriate development in the context of the site. We consider the site can provide great benefit by contributing to the continued enhancement of Whittlesey and maintain its future vitality by providing a range of

LP44.01

employment opportunities and economic benefits.

LP44.02

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

Comment Support

These representations are made on behalf of King's Dyke Business Park Ltd, who is delivering the sites identified as allocations LP44.01 and LP44.02 by Policy LP44. The identification of LP44.02 as an existing site for major employment development is supported. Outline planning permission (all matters reserved except access) was granted in December 2020 for up to 7,432 sqm of B1 and B8 uses (F/YR20/0357/O). The site is located to the north of the new King's Dyke crossing bypass (Ralph Butcher Causeway), and will enable the revitalisation of vacant brownfield land. The applicant has been progressing detailed design of the scheme in order to submit the next stage of reserved matters by the end of 2023 as required by the outline planning permission. It is confirmed that the applicant remains committed to delivering this employment site and thereby providing economic benefits for the local area and the wider District. There is the potential for the site to provide a variety of other uses from within Class E that would be appropriate for the site. It is suggested that Policy LP44 should recognise that, subject to the grant of further planning permission, sites with extant permission could be found appropriate to deliver additional employment uses.

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While these additional uses would technically fall within the definition of 'main town centre

LP44.02

use', the site is a more than appropriate location for businesses that directly benefit from passing traffic – such as drive through restaurants or trade counter uses. Such uses would be appropriate for the site as they would not draw custom away from the town centre and would be suitable to the context of the site and existing employment uses. Creating greater flexibility in the policy wording on the suitable uses that are expected on the site would also help ensure the long-term viability of the site.

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employment opportunities and economic benefits.

LP45: An aspirational community

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

Comment Object

General comments:

The Friends of Wenny Road Meadow agree with the settlement boundary for Chatteris. This includes the removal of Site 40284 (Land off Wenny Road) from the settlement boundary, which we will expand upon in a separate submission.

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

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

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

LP45: An aspirational community

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

Comment Object

This policy includes 2 broad locations for employment growth, south west of Chatteris (N and S of A141) and NE of Chatteris and east of A141. Whilst there are no designated heritage assets within these areas, careful consideration should be given to large scale development on the edge of this historic town and the impact that may have on the setting of the town, its conservation area and other nearby heritage assets.

The bulk, scale and mass of employment development in edge of town locations within this flat landscape requires careful consideration and mitigation in terms of appropriate landscaping, planning, building colour and form. We recommend that you include reference to this in the policy.

We note that this land to the NE of Chatteris is included as part of the wider area for the Fens Reservoir – close co-ordination between Fenland DC and the applicant will be required in this regard.

Suggested Change - The bulk, scale and mass of employment development in edge of town locations within this flat landscape requires careful consideration and mitigation in terms of appropriate landscaping, planning, building colour and form. Include reference to this in the policy.

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

Comment Neutral

LP45: An aspirational community

As previously identified in this submission, the public consultation on the Fens Reservoir is now available until 21st December 2022. The proposed site is between Chatteris and March, near to Doddington, Wimblington and Manea. During times of high rainfall, river flows from the Great Ouse catchment would feed the reservoir with water. The water stored at the reservoir will then be treated and transported so it can be supplied to people's homes and businesses throughout the year.

Through all our work to identify the best performing site for the Fens Reservoir we have sought input from a range of stakeholders on our proposals, as they continued to develop, including the local authorities in Cambridgeshire. This is to ensure we keep informed of Fenland District Council's own proposals for the area and seek the Council's opinion on how the reservoir could minimise potential impacts and maximise potential benefits.

We note the Local Plan identifies two Broad Locations for Employment Growth (BLFEG) adjacent to the town which includes land North-East of Chatteris and east of the A141. This is within the proposed area of land identified for further development to support the reservoir primarily as a water supply resource, and renewable energy technology to support our net zero ambition, but also as a tourism and leisure destination. We therefore support the allocation of the north-eastern BLFEG as an employment area that can maximise opportunities presented by Fens Reservoir. We would welcome policy support for supporting infrastructure and business development that is both imperative for the operational context of the reservoir, but also to provide wider tourism and leisure opportunities for residents and visitors to the reservoir in the future, including active travel routes between the town and reservoir. Whilst we note that a Masterplan is required for the BLFEGs to establish a clear framework for delivery, we would welcome continuing engagement with the Council and the community as we proceed towards further detailed stages of the Fens Reservoir project and the longer-term opportunities to support employment growth for the town and district.

LP45: An aspirational community

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

Comment **Support**

We support the proposals for the BLFEG to the North East of Chatteris and East of the A141. Clients own part of this area and we are working with other land owners to seek to develop a master plan for promotion of the area with access taken from the A141.

We note with interest that the recent Fens reservoir proposals identify this area as potentially containing some of the ancillary treatment works and control systems infrastructure for the reservoir. Such a proposal is not incompatible with the BLFEG policy. It would be possible for common access infrastructure and necessary services to be provided that would serve both proposals and the landscaped margins of the reservoir north of the Forty Foot would provided a high quality environmental surroundings that might encourage the location as suitable for a wide range of business uses, to help draw more employment to Fenland.

We believe that there will be support from the majority of ownerships in this area to the proposed policy and a willingness to make land available for the proposed policy intentions. The scale of the scheme is also welcomed in being sufficiently large as to assist the viability of providing the necessary access and other infrastructure to the area to facilitate development.

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

Comment **Neutral**

Developments proposed under Policy LP45 fall within the Consultation Areas for the Chatteris-Nightlayer Fen Water Recycling Centre (WRC) and the Furlong Farm Waste Management Area. Development will need to ensure that it does not prejudice the ongoing use of safeguarded sites as per Policy 16 of the MWLP. Please note the policy requirement for an odour assessment in relation to developments in proximity to the WRC.

LP45: An aspirational community

Title:		Position:	Associate Planner
First Name:	Kate	Organisation:	Pegasus Group on behalf of Greystoke L
Surname:	Wood		

Comment Object

Policy LP45 is worded to the effect that the landowners of each parcel of land within the broad location for employment growth (BLFEG) must follow a masterplan for that geographic area. It is not clear who will prepare the masterplan, how development at different times will be dealt with, and how this relates to the provision of associated infrastructure.

In this respect, the policy does not ensure that the development is deliverable as required by NPPF paragraph 35.

Developers of smaller parcels of land are able to bring forward development quickly in order to meet needs, whereas developers of larger areas would require more time to set out a masterplan process.

Given that the allocation is for employment development rather than residential, which would require associated supporting infrastructures such as public open space and community facilities, the issues relating to employment development area essentially access and landscaping. The policy should therefore be re-worded as a criteria-based policy which requires developers of individual sites to take account of the cumulative impact of development within the BLFEG in putting together application proposals. This will ensure that the development can still come forward in a coordinated way despite being piecemeal, as required by NPPF policy 82.b) and d). Given the current economic climate, it is vital (as noted by NPPF paragraph 82.d)) that the policy provides the opportunity to respond to economic circumstances as they arise.

It is anticipated that a criteria-based policy would include such matters as might be found in a design code, such as maximum height of buildings, the requirement for landscaping of land parcels to create green rooms within which commercial buildings will sit and appropriate assessment of highway impact in relation to junctions with the Huntingdon Road.

Indeed, design is already controlled by proposed policy LP7.

LP45: An aspirational community

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

Comment	Object
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Fenland’s employment challenges are recognised including the difficulty of attracting higher value employment into the district to promote a more diverse successful local economy. The spatial strategy for employment development set out in Policy LP3 Spatial Strategy for Employment Development is supported as focusing the majority of growth within the four market towns and thereby promoting opportunities to reduce the need to travel along with limited employment growth in villages and the countryside reflecting the high proportion of businesses associated with agriculture and food processing. It is noted that the 225ha of employment land proposed through policy LP3 meets Fenland’s identified need for employment land in full. Therefore, HDC considers it necessary to express significant concern at the inclusion of a further 100ha of land as two ‘broad locations’ for employment growth to the south-west and north-east of Chatteris. The broad locations have potential to detrimentally impact on employment growth aspirations in the north-eastern part of Huntingdonshire, particularly at the market town of Ramsey. HDC is currently investing significant efforts into preparing the Ramsey Implementation Masterplan and would not wish to see these negatively impacted upon by delivery of additional growth aspirations substantially over and above identified need in Fenland. However, should the approach remain, the detailed proposals in Policy LP45 An Aspirational Community for the requirement for master plans for each of the broad locations for employment growth is supported.

LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Samantha

Organisation:

Surname: Snow

Comment **Support**

I agree that Site 40284 (Land off Wenny Road) should not be included within the settlement boundary or the housing allocation for the reasons identified in the Sites Evidence Report (August 2022), namely: insufficient highway access; impact on heritage assets; significant loss of biodiversity; loss of open space.

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Title:

Position:

First Name: Paulette

Organisation:

Surname: Church

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Steve

Organisation:

Surname: Hazell

Comment **Support**

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Title:

Position:

First Name: Susan

Organisation:

Surname: Hazell

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Wesly

Organisation:

Surname: Palmer

Comment **Support**

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Title: Mrs

Position:

First Name: Wendy

Organisation:

Surname: Palmer

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: James

Organisation:

Surname: Burrow

Comment **Support**

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Title:

Position:

First Name: Robert

Organisation:

Surname: Stockman

Comment **Support**

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Title:

Position:

First Name: Mark

Organisation:

Surname: Hemment

Comment **Neutral**

Good to see 'Wenny Meadow' (F/YR21/0981/F) is not on the list of sites allocated for housing. Its historic and biodiversity are too valuable to lose to development. It is also used as an important green space by residents (it is the last remaining significant, unstructured, green space in the town).

LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Martin

Organisation:

Surname: Snow

Comment **Support**

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Title:

Position:

First Name: Marion

Organisation:

Surname: West

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Richard

Organisation:

Surname: Unsworth

Comment **Support**

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Title:

Position:

First Name: Graham

Organisation:

Surname: Bunn

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Brenda

Organisation:

Surname: Bunn

Comment **Support**

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Title:

Position:

First Name: Caroline

Organisation:

Surname: Turner

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Edward

Organisation:

Surname: Millard

Comment **Support**

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Title:

Position:

First Name: Andrew

Organisation:

Surname: Riley

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Elaine

Organisation:

Surname: Rogers

Comment **Support**

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Title:

Position:

First Name: Robert

Organisation:

Surname: Mason-Hughes

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Nicola

Organisation:

Surname: Stockman

Comment **Support**

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Title:

Position:

First Name: Matthew

Organisation:

Surname: Cooper

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Anthony

Organisation:

Surname: Nottage

Comment **Support**

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Title:

Position:

First Name: Janet

Organisation:

Surname: Needham

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Paul

Organisation:

Surname: Sadler

Comment **Support**

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Title:

Position:

First Name: Suzanne

Organisation:

Surname: Cole

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Andrew

Organisation:

Surname: Lenton

Comment **Support**

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Title:

Position:

First Name: Louisa

Organisation:

Surname: Lenton

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: J

Organisation:

Surname: Osborne

Comment **Support**

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Title:

Position:

First Name: Catherine

Organisation:

Surname: Bell

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Christine

Organisation:

Surname: Cunningham

Comment **Support**

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Title:

Position:

First Name: David

Organisation:

Surname: Bailey

Comment **Support**

I agree that Site 40284 (Land off Wenny Road) should not be included within the settlement boundary or the housing allocation for the reasons identified in the Sites Evidence Report (August 2022), namely: insufficient highway access; impact on heritage assets; significant loss of biodiversity; loss of open space.

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Andrew

Organisation:

Surname: Pluck

Comment **Support**

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Title:

Position:

First Name: Stephanie

Organisation:

Surname: Cole

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Christopher

Organisation:

Surname: Bray-Allen

Comment **Support**

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Title:

Position:

First Name: David

Organisation:

Surname: Carter

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Lisa

Organisation:

Surname: Carter

Comment **Support**

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Title: Mrs

Position:

First Name: M R

Organisation:

Surname: Hatch

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:	Mr and Mrs	Position:
First Name:	Terry and Deborah	Organisation:
Surname:	Mason	
Comment	Support	

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Title:		Position:
First Name:	Graham	Organisation:
Surname:	Cox	
Comment	Support	

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Gary

Organisation:

Surname: Garner

Comment **Support**

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Title:

Position:

First Name: Peter

Organisation:

Surname: Rickard

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title: Mr **Position:**

First Name: G **Organisation:**

Surname: Brierley

Comment **Support**

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Title: **Position:**

First Name: Melissa **Organisation:**

Surname: Mason-Hughes

Comment **Support**

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Title: **Position:**

First Name: Christine **Organisation:**

Surname: Hennessey

Comment **Support**

No more building until infrastructure is improved.

LP46: Residential site allocations in Chatteris

Title:		Position:
First Name:	Nicholas	Organisation:
Surname:	Rudd	
Comment	Support	
I use this area daily and am very concerned as this is one of the last green spaces to be considered.		

Title:		Position:
First Name:	Nigel	Organisation:
Surname:	Ransome	
Comment	Support	
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Title:		Position:
First Name:	Daron	Organisation:
Surname:	Wild	
Comment	Support	
This is specially about Land Off Wenny Road (40284). I agree it should not be considered for housing development. However, contrary to local opinion, I understand Chatteris Town Council are now asking for it to be added back.		
Your plans talk about potential Solar Farms. Maybe this land could be dual purpose, a combined meadow & solar farm, with paths and benches. Or protect the meadow as a Local Green Space i.e LP30 and LP24.		

LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Patricia

Organisation:

Surname: Brooks

Comment **Object**

The planned eastward expansion of Chatteris on various sites will simply contribute to existing traffic and infrastructure inadequacies. No account seems to have been taken of the lack of viable walking and cycling amenities around and in the vicinity of the town.

Title:

Position:

First Name: Eleanor

Organisation:

Surname: Hurrell

Comment **Support**

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Title:

Position:

First Name: John

Organisation:

Surname: Moore

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title: _____ **Position:** _____

First Name: Frances **Organisation:** _____

Surname: Aspinall

Comment **Support**

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Title: _____ **Position:** _____

First Name: Elizabeth **Organisation:** _____

Surname: Avory

Comment **Object**

Please improve our surgery and infrastructure then build houses.

Title: _____ **Position:** _____

First Name: Lee **Organisation:** _____

Surname: Bevens

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:		Position:	
First Name:	John	Organisation:	
Surname:	Paul		
Comment		Support	
I agree that Site 40284 (Land off Wenny Road) should not be included within the settlement boundary or the housing allocation for the reasons identified in the Sites Evidence Report (August 2022), namely: insufficient highway access; impact on heritage assets; significant loss of biodiversity; loss of open space.			
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Title:	Mr	Position:	Planning Manager
First Name:	Philip	Organisation:	Sport England
Surname:	Raiswell		
Comment		Neutral	
These policies must include protection of existing sports facilities, improvement of existing facilities, and provision for additional facilities where needed.			

Title:		Position:	
First Name:	Alex	Organisation:	
Surname:	Ashley		
Comment		Support	
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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Adam

Organisation:

Surname: Belcher

Comment **Object**

I disagree that the meadow should be included for development. Why are you going against what 92% of Chatteris want!?

Title: Mr

Position:

First Name: Ian

Organisation:

Surname: Mason

Comment **Object**

The development of 1,000 homes at Tithe Barn has apparently been given the go ahead to provide service roads, services and drainage to access the site after an archaeology assessment. Work is expected to start in October 2022 or possibly January 2023. Perhaps the current economic down turn might now put this on hold, otherwise this amount of new properties will certainly have a bearing on the need for more developments in excess of the of the current FDC housing plans, especially with the threat of cessation of bus services into and out of Chatteris. The Wenny Road meadow development should be removed from the residential site allocation in this draft plan.

Finally, I feel we must emphasise how the developers application to buy alternative biodiversity sites to mitigate the net loss of habitat on the Wenny Road meadow is so wrong. The loss of this site can never be replaced or recovered. The variety of birds, animals, insects, reptiles, flowers, and grasses, especially those on the red lists, would take many years to re-establish, if they are not lost forever because of their current rarity. This really is about the future of the planet and the biodiversity legacy we are leaving our children. The attitude toward trees in decay is typical. Removal rather than management is wrong. Recognising that organisms that can only survive on decay is as important for ecology as keeping open spaces safe and healthy. If COVID-19 has taught us anything it is that we need to be able to live with our pandemics and germs rather than try to eliminate them. The provision of healthy outdoor areas in any urban planning is essential for our specie. Mental and physical health is a huge drain on our NHS and economy. Retention of this area within the Town is vital to make Chatteris a place people will want to live in and be part of a healthy community. The Fenland Reservoir would be another major asset to make Chatteris a vibrant healthy place to be. It's not just planning sensibly for living, its also for tourism, preservation of nature and the wider economy.

Title:

Position:

First Name: Steve

Organisation:

Surname: File

Comment **Support**

CP40284 - Land off Wenny Road, Chatteris

I support the proposition to remove the land commonly known as Wenny Meadow in its entirety from the development allocation for Chatteris and furthermore support the call for it to be designated as a Local Green Space. There is overwhelming support from the people of Chatteris as evidenced in the circa 500 objections to the planning application not to mention a host of material planning non conformances. Votes cast in a recent parish poll were 92% against development and for LGS designation.

Given the above, there is no mandate for Chatteris Town Council to do anything other than concur with the legitimate and democratically expressed desire of the people of Chatteris.

LP46: Residential site allocations in Chatteris

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

Comment	Object
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The 2014 Board Concept Plan allocation should be included as logical land to develop.

In addition to the above, why is FDC land included in the Draft allocation, but not remainder.

Title:	Mrs	Position:	
First Name:	J	Organisation:	Chatteris Town Council
Surname:	Melton		

Comment	Object
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40167 - land off Slade Way. This site has been rejected in the report but members feel it is potentially suitable for developemnt

40248 - land off the A142. The site has been rjected in the report but members agree it is potentially suiatable for developemnt.

40284 - Land off Wenny Road. The site has been rjected in the report (although it is classified as uncertain suitability) byt by a majority members agree that the part of the site which is the subject to a live applicataion for 93 homes should reamin as allocated land and the area identified in the planning applicataion as green space should be identified as Local Green space.

40326 (LP46.02) land east of 80 Elms. The area has been allocated in the report but members reierate their belief that the access proposed in unsuitabale.

Title:		Position:	
First Name:	Sarah	Organisation:	
Surname:	Avory		

Comment	Object
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Improve the surgery and infrastructure then talk building houses.

LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Zoe

Organisation:

Surname: Vawser

Comment **Support**

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Title:

Position:

First Name: Brian

Organisation:

Surname: Clarke

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:	Mrs	Position:
First Name:	Yvonne	Organisation:
Surname:	Watson	

CommentSupport

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Title:		Position:
First Name:	Alison	Organisation:
Surname:	Pardon	

CommentSupport

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LP46: Residential site allocations in Chatteris

Title: _____ **Position:** _____

First Name: Carl **Organisation:** _____

Surname: Pardon

Comment **Support**

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Title: _____ **Position:** _____

First Name: Helen **Organisation:** _____

Surname: Beston

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Claudia

Organisation:

Surname: Buchan

CommentSupport

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Title:

Position:

First Name: Daniel

Organisation:

Surname: Rowell

CommentSupport

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Gemma

Organisation:

Surname: Rowell

Comment **Support**

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Title:

Position:

First Name: Jane

Organisation:

Surname: West

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Kim

Organisation:

Surname: Waters

Comment **Support**

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Title:

Position:

First Name: Hazel

Organisation:

Surname: Lyons

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:		Position:	
First Name:	J	Organisation:	
Surname:	Smith		
Comment	Neutral		

More thought must be given to more joined up approach with areas of land to be developed. A piece meal approach of sites nos 40326 60025 in Chatteris for example is misled and they should be seen as one in terms of planning access to development or creating designated green space. To see the site as separate pieces leads to poor disjointed planning. green space should be as large as possible in the area that is currently valued by the community as a great resource historically for nature and recreation.

Title:		Position:	
First Name:	Carole Ann	Organisation:	
Surname:	Riches		
Comment	Support		

I feel that we need to keep this green space for now and the future.

Title:		Position:	
First Name:	Gemma	Organisation:	
Surname:	Whatley		
Comment	Support		

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Patrycja

Organisation:

Surname: Juszczyzyn

Comment **Support**

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Title:

Position:

First Name: Jenny

Organisation:

Surname: Comont

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Jane

Organisation:

Surname: Mason

Comment **Support**

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Title:

Position:

First Name: Claire

Organisation:

Surname: Newton

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Carole

Organisation:

Surname: Stronge

Comment **Support**

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Title:

Position:

First Name: Rebekah

Organisation:

Surname: O'Driscoll

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: W

Organisation:

Surname: Wilson

Comment **Support**

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Title:

Position:

First Name: Dorothy J

Organisation:

Surname: Ivory

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Dan

Organisation:

Surname: Grannell

Comment **Support**

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Title:

Position:

First Name: Lynette

Organisation:

Surname: Law

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Lesley

Organisation:

Surname: Heather

Comment **Support**

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Title:

Position:

First Name: Gary

Organisation:

Surname: Heather

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Bryan & Linda

Organisation:

Surname: Misseldine

Comment **Support**

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Title:

Position:

First Name: Michelle

Organisation:

Surname: Freeman

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Robert

Organisation:

Surname: Parr

Comment **Support**

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Title:

Position:

First Name: Antanas

Organisation:

Surname: Lankutis

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Paul

Organisation:

Surname: Dunn

Comment **Support**

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Title:

Position:

First Name: Sabina

Organisation:

Surname: Lankute

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Anthony and Carol

Organisation:

Surname: Beckett

Comment **Support**

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Title: Mrs

Position:

First Name: Sarah

Organisation:

Surname: Everest

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Hazel

Organisation:

Surname: Rudd

Comment **Support**

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Title:

Position:

First Name: Sarah

Organisation:

Surname: Thompson

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Tim

Organisation:

Surname: Fitches

Comment **Support**

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Title:

Position:

First Name: Rosalind

Organisation:

Surname: Fitches

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Penny

Organisation:

Surname: Bale

Comment **Support**

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Title:

Position:

First Name: Carole

Organisation:

Surname: Nottage

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Elizabeth

Organisation:

Surname: Dunn

Comment **Support**

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Title:

Position:

First Name: Shirley

Organisation:

Surname: Binham

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:		Position:	
First Name:	Gavin	Organisation:	
Surname:	Price		
Comment	Support		
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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Lawrence

Organisation: Friends of Wenny Road Meadow

Surname: Weetman

Comment **Support**

Site 40284 (Land off Wenny Road)

Support the council's decision to place outside of settlement boundary and not allocate:

The Friends of Wenny Road Meadow agree with the council's decision to place this site, and Wenny Road Meadow in particular, outside of the settlement boundary for Chatteris.

This site has been subject to a live planning application (F/YR21/0981/F) for more than a year, but there has been no progress towards a resolution of key planning issues. At the time of writing, there has been no activity from the developer's agent in several months.

As part of that application the Conservation Officer, as well as a landscape historian (Dr Sarah Spooner of the University of East Anglia), has outlined the harm to the undesignated heritage asset of Wenny Meadow as the former Manor Park of Chatteris. There will also be harm to the setting of the Grade II Listed Manor House and the site appears to suffer from difficulties with its conflict with the ridge and furrow earthworks, which expand far beyond the "archeological protection zone" defined in the previous Broad Concept Plan.

The developer says that the site has limited financial viability, as outlined in the viability report submitted with the live planning application. This report estimates that under the adopted local plan the developer would be expected to contribute in excess of £700,000 in developer contributions. This is likely very conservative, as it is based on other sites that have had their contributions reduced via negotiation. That viability report says that the development only remains viable if developer contributions are kept at £28,000 for the entire 93-dwelling site. It is clear that this is a very small margin for viability, so the site is unlikely to be sufficiently viable or deliverable to warrant inclusion in the local plan. This level of developer contribution is also insufficient to meet the needs of other policies of the new local plan, and equivalent policies in the adopted plan. The NHS has said that it would require contributions of £55,894 towards GP services and £20,412 towards ambulance services. Therefore, it does not provide contribution to health and wellbeing (LP5 of the emerging plan, LP2 of the adopted plan) or health infrastructure (LP19 of the emerging plan, IDP/LP13 of the adopted plan). This situation is repeated for education provision (LP19 of the emerging plan, IDP/LP13 of the adopted plan), contribution towards the transport plan, and so on.

The developer's own viability report also indicates that the development is only viable with a 10% affordable housing provision. This would be against LP12 of the emerging local plan and is not in accordance with LP5 of the adopted local plan. This further shows that the site is not deliverable in accordance with sustainable development principles and that viability of the site is a significant barrier to delivery.

The applicant's most recent Biodiversity Net Gain Assessment says that the development of the site would result in a 19.28% net loss of biodiversity, even after mitigations have been factored into the assessment. Given that The Environment Act 2021 and the new local plan both require 10% Biodiversity Net Gain from developments, and that this will be mandatory for new developments, it is clear that there is a clear gulf between the requirements and the 19.28% Biodiversity Net Loss provided by development of this site. The applicant had expressed interest in purchasing "credits" or funding biodiversity improvement projects elsewhere. This would be in accordance with the provisions of the new local plan policies on biodiversity, but the slim viability outlined above would suggest that any attempt to purchase sufficient "credits" to reverse the biodiversity net loss would render the site unviable. Therefore, it should not be included within the housing allocation or settlement boundary. At the time of writing, the site is still recommended for refusal by the Wildlife Officer and there are significant unresolved objections from The Wildlife Trust.

It should also be noted that Local Green Space designation for this site was supported by 92% of voters in a parish poll held on 7th June 2022. This is the only section of the Fenland emerging local plan to have been subject to this kind of

LP46: Residential site allocations in Chatteris

direct democracy, with a very clear result showing that residents overwhelmingly do not want to see this site developed. While we note that Chatteris Town Council has been in favour of development of the site, the poll result was clearly very decisive and should be treated as the true democratic representation of the desires of Chatteris residents - who all had an equal opportunity to vote in the very well-advertised parish poll.

Allocation of only the part of the former East Chatteris Broad Concept Plan area covered by the live planning application F/YR21/0981/F would result in 93 homes that protrude into the countryside, with an incongruous ribbon of development emanating away from Wenny Road, close to the bypass, and very detached from the rest of the town.

Finally, it is important to note that this development is not needed within the allocation in order to meet Fenland's housing needs. The residential spatial strategy set out in LP2 of the new plan accounts for 103% of Fenland's housing need for the plan duration. The Five Year Land Supply report prepared for the local plan review in July 2022 identifies that the plan in its current form will deliver 6.34 years' worth of housing supply over a five-year period, with delivery of approximately 128% of the five year housing supply requirement.

Chatteris is already growing by a substantial amount within the local plan period, more than any other market town when compared with the number of dwellings at the 2011 census. The current housing allocation would result in 38% growth in the number of dwellings in Chatteris compared to 2011, whereas this figure stands at 27% for March, 17% for Wisbech and just 16% for Whittlesey. In this context, whether or not Chatteris can sustain such levels of growth is already questionable without the addition of further homes at the Wenny Meadow site.

The response of the Conservation Officer is included as FoWRM-04.

Landscape Historian Dr Spooner's response is included as FoWRM-05.

The applicant's viability report is included as FoWRM-06.

The response of the NHS is included as FoWRM-07.

The response of the Ambulance Service is included as FoWRM-08.

The applicant's Biodiversity Net Gain Assessment is included as FoWRM-09.

The response of the Wildlife Officer is included as FoWRM-10.

The response of The Wildlife Trust is included as FoWRM-11.

The declaration of the result of the Parish Poll is included as FoWRM-12.

Title:

Position:

First Name: Valerie

Organisation:

Surname: Emmons

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Maxim

Organisation:

Surname: Emmons

Comment **Support**

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I have read many of the reasons given for 40284 being unsuitable for and agree with the conclusions that building on it would be a travesty.

I am angry that Chatteris Local Council should consider ignoring the result of the poll that all Chatteris residents were free to partake in, and the result was 92% of voters agreed the area should remain as a Local Green Space. One can only lead to the view that certain councillors have personal vested interest in building housing on this site despite the wishes of local people.

I understand other more suitable spaces have been found which provide sufficient space to meet the demands of national house-building current needs.

Title:

Position:

First Name: Clare

Organisation:

Surname: Howard

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:		Position:	
First Name:	Victoria	Organisation:	
Surname:	Halmshaw		
Comment	Support		
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LP46: Residential site allocations in Chatteris

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

Comment

Land south of Chatteris

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

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

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

Housing Provision

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

Health Hub

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

Chatteris Link Road

Land south of Chatteris can assist in the facilitation of the delivery of a western link road connecting the A141 and London Road, through improvements and provision of an appropriate connection point on London Road and funding towards its delivery. The completion of the Chatteris Ring Road is a long-standing aspiration of the Town Council and is supported by local residents^{21 22}, and will significantly reduce the amount of through traffic thus improving the public realm and local environment.

Green Infrastructure and Open Space

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

Economic Benefits

Land south of Chatteris will support the local economy through the provision of new jobs in the construction phase,

LP46: Residential site allocations in Chatteris

the provision of new homes for local employees, and increased local spend in the town centre.

Environmental Effects

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

Phasing and Delivery

Delivery of Land south of Chatteris would come forward in the latter stages of the Plan period once considerable progress has been made in the delivery of Phase One, including its infrastructure. This would allow for balanced and sustained growth of Chatteris throughout the Plan period, and help to better ensure that the Council are able to demonstrate a positive Five Year Housing Land Supply to 2040. In the absence of a delivery trajectory for the proposed allocations, it is unclear when it is envisaged that growth will come forward in Fenland District, however in line with the Framework sites should be identified to deliver in the latter stages of the Plan period

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

Comment Object

LP46: Residential allocations in Chatteris

2.4.5 Policy LP46 identifies the preferred housing allocations within Chatteris. These allocations are intended to meet the identified distribution of housing growth as identified under policy LP2. For Chatteris, a distribution of 17% of the housing requirement, equating to 1,737 dwellings is distributed to the settlement. Notwithstanding our commentary on the overall housing distribution, we make the following comments in relation to the identified residential allocations in Chatteris.

2.4.6 The table below identifies those sites forming residential allocations in Chatteris.

It is clear that the identified housing allocations in Chatteris, as listed above, fall short of the intended distribution to the settlement. This shortfall equates to 39 dwellings.

2.4.8 Concern is raised in relation to the reliance of meeting the housing distribution through extant planning permissions, totalling 1,377 dwellings or 81% of the identified supply within the settlement. Accounting for a 10% lapse or non-implementation rate and any reduction in deliverable capacity, that deliverable figure could reduce by a further 130 dwellings.

2.4.9 It is therefore advised that additional sites are sought within the settlement to meet the distribution as intended by the Growth Strategy and Policy LP2 and that settlement boundaries are amended accordingly to reflect additional identified sites.

LP46: Residential site allocations in Chatteris

Title:		Position:	
First Name:	Louise	Organisation:	
Surname:	Bradshaw		
Comment	Support		
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LP46: Residential site allocations in Chatteris

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

Comment	Object
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Land at Huntingdon Road, Chatteris. SHEELA Ref: 40317

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.

Chatteris has been identified as a 'Market Town' (Policy LP1) and as such sits at the top of the settlement hierarchy. The Site has been rejected primarily for noise issues and visual impact. It is however retained within the town development boundary. The following Extract from the proposals map identifies the extent of the allocations in this part of Chatteris and the location of the Site:

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.

Chatteris is identified as a Market Town in the settlement hierarchy (Policy LP1) and as such is a location where additional housing growth should be focused. Market Towns are the top tier of the hierarchy and not only the focus for growth but also investment in infrastructure.

Furthermore, Chatteris is located in the south of the district making development more viable with a realistic proposition of delivering both market and affordable housing.

One of the key concerns raised as part of the site assessment process was the proximity of the Site to a busy road and nearby employment uses, and the potential impact this could have on the amenity of future occupiers. The Site is located in a transition area at the western edge of the settlement where residential uses predominated to the east with commercial uses to the west. The Site fronts onto the old Huntingdon Road which has been stopped up to vehicle traffic, as such creating a more intimate environment suited to residential use. The A141 runs along the rear and it is this which it is understood to be the main cause of concern in respect of noise generation.

The site assessment also suggests that the Site provides an attractive entrance to the town and that development could adversely impact on the street scene and local character.

Whilst the stated concerns are noted, there are existing residential properties adjoining the Site immediately to the east and in Willow Tree Close opposite. These appear to exist without problem and have a similar relationship to the local context.

While the Site is not large, it could still be developed in a way that could deliver a suitable living environment for new occupants and maintain an appropriate character and setting at this entrance to the town. In respect of the entrance to the town, this needs to be considered in its wider context which is in fact dominated by the Bartlett Business Park to the west and the industrial premises off Honeysome Road to the north.

Given the transitional nature of the Site it is considered that a modest two and a half storey flatted scheme, located on the south eastern part of the site would represent a suitable response to the local context. Such a scheme would allow for the retention of some of the existing trees along the northern boundary, enhanced landscaping elsewhere and an appropriately design and detailed building. An acoustic report could be undertaken to reinforce the building design and ensure that an appropriate living environment can be delivered. It should be noted that it is easier to include sound mitigation design measures within a single building containing flats, than traditional houses. Non habitable and communal spaces can be located with any Windows on more noise sensitive façades thereby creating

LP46: Residential site allocations in Chatteris

an acceptable internal living environment for residents.

Including the Site as an allocation would allow an efficient use of this otherwise redundant parcel of land and help bring forward a modest additional amount of housing. As part of any site allocation policy the inclusion of acoustic design measures based on a site assessment could be included as a requirement.

Accordingly it is recommended that the allocation strategy for Chatteris is revisited and Site 40317 is included as additional new allocation.

It is therefore suggested that Policy LP46 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 be considered 'sound' at examination.

Chatteris is identified as a Market Town in the settlement hierarchy (Policy LP1) and as such is a location where additional housing growth should be focused. Market Towns are the top tier of the hierarchy and not only the focus for growth but also investment in infrastructure.

Furthermore, Chatteris is located in the south of the district making development more viable with a realistic proposition of delivering both market and affordable housing.

It is considered that a sensitively designed scheme could deliver a development which is appropriate in the street scene and responds to the sites gateway context. As set out above noise concerns can adequately be addressed through a suitable design response and the location already appears to provide an acceptable residential living environment.

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 LP46 should be amended to include this site as a new additional allocation.

LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Fiona

Organisation:

Surname: Bryan

Comment **Support**

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Title:

Position:

First Name: Ray

Organisation:

Surname: Taylor

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Sam

Organisation:

Surname: Ward

Comment **Support**

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Title:

Position:

First Name: Margaret

Organisation:

Surname: Ward

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Sandi

Organisation:

Surname: Christmas

Comment **Support**

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Title:

Position:

First Name: J

Organisation:

Surname: Bennett

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Edita

Organisation:

Surname: Gorelyte

Comment **Support**

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Title:

Position:

First Name: Ieva

Organisation:

Surname: Skieryte-Kalnikiene

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Liutauras

Organisation:

Surname: Puckorius

Comment **Support**

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Title:

Position:

First Name: Thomas

Organisation: Pegasus Group

Surname: Kilvert

Comment **Object**

The policies map identifies a Local Green Space being created off Wenny Road Chatteris. This land is in private ownership with no public rights of access over it. The land has not been put forward by the landowner for Local Green Space use in isolation.

The open space area identified forms part of a current open space provision delivered by Cannon Kirk (UK) Ltd - planning application F/YR21/0981/F for 96 dwellings on the adjoining land.

This planning application is currently pending determination however if the application were to be refused this green space area should be removed from the policies map as it will only become public open space if the application is approved.

If the application is subsequently approved, then the designation can remain, and the adjoining housing development should be shown on the policies map and the town boundary adjusted accordingly.

If Planning Application F/YR21/0981/F is approved (allowing for any appeal if applicable) before the publication of the emerging Local Plan then it should be added to the list of extant planning permissions in Chatteris as set out in the table at Par 24.44

LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Samantha

Organisation:

Surname: Pearce

Comment **Support**

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Title:

Position:

First Name: John R

Organisation:

Surname: Ivory

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Pamela

Organisation:

Surname: James

Comment **Support**

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Title: Mr

Position:

First Name: A J S

Organisation:

Surname: Cave

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Richard

Organisation:

Surname: Mandley

Comment

Support

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Title:

Position:

First Name: Andrew

Organisation:

Surname: Gudgeon

Comment

Support

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Knud

Organisation:

Surname: Clemmensen

Comment **Support**

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Title:

Position:

First Name: Tobias

Organisation:

Surname: Harding

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title: Mrs **Position:**

First Name: Lesley **Organisation:**

Surname: Gibbs

Comment **Support**

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Title: Mrs **Position:**

First Name: Jennifer **Organisation:**

Surname: Mandley

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Kirsty

Organisation:

Surname: Merry

Comment **Support**

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Title:

Position:

First Name: M

Organisation:

Surname: Tuffs

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Steve

Organisation:

Surname: Reynolds

Comment **Support**

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Title:

Position:

First Name: Katina

Organisation:

Surname: Harding

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Julia

Organisation:

Surname: Turner

Comment **Support**

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Title:

Position:

First Name: Deborah

Organisation:

Surname: Evans

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Robert

Organisation:

Surname: Moorhouse

Comment **Support**

I agree that Site 40284 (Land off Wenny Road) should not be included within the settlement boundary or the housing allocation for the reasons identified in the Sites Evidence Report (August 2022), namely: insufficient highway access; impact on heritage assets; significant loss of biodiversity; loss of open space.

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Title:

Position:

First Name: Colin

Organisation:

Surname: Brett

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:		Position:
First Name:	Jonathan	Organisation:
Surname:	Derry	

CommentSupport

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Title:		Position:
First Name:	Barry	Organisation:
Surname:	Hookway	

CommentSupport

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Colleen

Organisation:

Surname: Smith

Comment **Support**

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Title:

Position:

First Name: Alison

Organisation:

Surname: Betts

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Steven

Organisation:

Surname: Cassidy

Comment **Support**

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Title:

Position:

First Name: Toma

Organisation:

Surname: Sarus

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Margot

Organisation:

Surname: Carson

Comment **Support**

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Title:

Position:

First Name: Elizabeth

Organisation:

Surname: Lee

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: David

Organisation:

Surname: Hilliard

Comment **Support**

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Title:

Position:

First Name: Nicholas

Organisation:

Surname: Howard

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Katherine

Organisation:

Surname: O'Shea

Comment **Support**

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Title:

Position:

First Name: Robert

Organisation:

Surname: Mayes

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Brenda

Organisation:

Surname: Calvert

Comment **Support**

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Title:

Position:

First Name: Lisa

Organisation:

Surname: Templey

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title: Mrs **Position:**
First Name: Susan **Organisation:**
Surname: Newton

Comment **Support**

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Title: **Position:**
First Name: Gordon **Organisation:**
Surname: Betts

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Nick

Organisation:

Surname: Templey

Comment **Support**

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Title:

Position:

First Name: Irene

Organisation:

Surname: Dawson

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: John

Organisation:

Surname: Dawson

Comment **Support**

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Title:

Position:

First Name: Rolandas

Organisation:

Surname: Patravicius

Comment **Support**

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: Laima

Organisation:

Surname: Asaciova

CommentSupport

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Title:

Position:

First Name: G

Organisation:

Surname: Tuffs

CommentSupport

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LP46: Residential site allocations in Chatteris

Title:

Position:

First Name: I J

Organisation:

Surname: Hargreaves

Comment **Support**

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Title:

Position:

First Name: Sheila

Organisation:

Surname: Mayes

Comment **Support**

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LP46.01

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

Title:		Position:	
First Name:	Liam	Organisation:	Peter Humphrey Associates Ltd
Surname:	Lunn-Towler		
Comment	Support		
LP46.01 site is still available and deliverable. The Draft allocation is located in a sensible and deliverable part of Chatteris.			

Title:	Mrs	Position:	
First Name:	J	Organisation:	Chatteris Town Council
Surname:	Melton		
Comment	Object		
40211 (LP46.01) - land south of Salisbury House, Blackmill Road. The site has been allocated in th report but members agree it is unsuitabale due to access.			

LP46.02

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

Comment Object

The Ridge and Furrow mentioned in the policy merits further investigation. 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 extent of allocation and policy wording.

Title:		Position:	
First Name:	Julie	Organisation:	
Surname:	Palmer		

Comment Object

I object to land east of 80 The Elms being designated as a housing allocation. Access is unsuitable and drainage is hugely problematic in this area.

Title:		Position:	
First Name:	Christopher	Organisation:	
Surname:	Palmer		

Comment Object

The proposed development of 90 homes by Fenland Futures on Fenland District Council owned land to the east of 80 The Elms Chatteris is not appropriate for 2 reasons: 1. Proposed vehicular access via The Elms is wrong as the existing roadway is inadequate in supporting additional housing other than that already in situ at the Elms. The original sale of land by the Ely Diocese to the Local Authority in the 1970's envisaged that the roadways within The Elms would be for The Elms houses only. This was a condition of sale lasting for some 80 years to 2040, as per deed of variation attached. 2. The Council owned land should be used as "enabling land" to create a Chatteris Country park in support of LP 29 please see comment two.

Title:	Mrs	Position:	
First Name:	J	Organisation:	Chatteris Town Council
Surname:	Melton		

Comment Object

40326 (LP46.02) land east of 80 Elms. The area has been allocated in the report but members reiterate their belief that the access proposed is unsuitable.

LP46.03

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

LP46.04

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

LP46.05

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

Comment	Object
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Site Allocation LP46.05 SHELAA Ref. 40288 20 houses 14.15ha - (Page 137) (Map 02 Chatteris (Inset))

Land west side of Fenland Way

Whilst it is acknowledged that Chatteris Town Council has had a long aspiration for a navigation facility to serve the town and note that the proposed development should provide amongst other things “For the construction, access and maintenance of moorings and a turning area on Fenton Lode drain with the location, extent and details to be agreed with the Middle Level Commissioners”.

It should be noted that neither Fillenhams Drain/Dents Diversion are navigable watercourses. This waterway is protected by Warboys, Somersham and Pidley IDB and not the Commissioners. The majority of Fillenhams Drain is owned by the aforementioned Board but Dents Diversion is under separate ownership.

The water levels within the waterway are governed by a water control structure close to the junction with the Forty Foot River. Its main purpose being to prevent flood water from the Commissioners’ system entering the Board’s system during high rainfall/flood events. During normal events the waterway is not deep enough to serve even shallow bottomed craft but depths do rise temporarily when the Board’s pumps at Washways Bridge operate. The subsequent discharge has been described as a “tidal wave” and thus not conducive to boating operations potentially requiring “strong stream” advice.

In engineering terms, it would be possible to raise the water levels to maintain a navigation but this would significantly increase flood risk to the north west of Chatteris which discharges into it. This solution would require the provision of a lock and water control facility at the outfall together with the raising of defences, possibly using sheet piles, both of which would require significant investment. The latter would be difficult to install in the urban area due to the existing constraints.

It is respectfully suggested that the recently announced Fens Reservoir may offer a better solution and this can be included in any discussions with Anglian Water.

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

LP46.05

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

Comment **Neutral**

LP39.08 – Land east of Berryfield and LP46.05 – Land west side of Fenland Way

The Sites Evidence Reports for these sites indicate that over 50% of this site is in Flood Zones 2 and 3. We recommend that the policies for these site allocations state that development proposals should:

- Direct ‘more vulnerable’ development to areas at lowest risk of flooding, taking into account all sources of flood risk and the impacts of climate change.

LP46.06

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

LP46.09

Title:		Position:	
First Name:	Edward	Organisation:	
Surname:	Houlston		
Comment	Object		
Break in wildlife habitats whilst plenty of new developments taking place not marked on the map.			

LP46.11

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

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

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

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

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

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

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

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

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

Phasing and Delivery

Delivery of Land south of Chatteris would come forward in the latter stages of the Plan period once considerable progress has been made in the delivery of Phase One, including its infrastructure. This would allow for balanced and sustained growth of Chatteris throughout the Plan period, and help to better ensure that the Council are able to demonstrate a positive Five Year Housing Land Supply to 2040. In the absence of a delivery trajectory for the proposed allocations, it is unclear when it is envisaged that growth will come forward in Fenland District, however in line with the Framework sites should be identified to deliver in the latter stages of the Plan period.

LP47: Employment allocations in Chatteris

Title:		Position:	
First Name:	Lawrence	Organisation:	Friends of Wenny Road Meadow
Surname:	Weetman		
Comment	Object		
General comments:			

The council may wish to make revisions to the details of the employment growth locations (e.g, types of industries that will be supported in each location) in light of the proposed reservoir to the north of Chatteris. For example, the plan may want to improve employment opportunities and tourism by providing space for restaurants and watersports equipment shops to the north of the town.

It would be a shame if the entrance to Chatteris from the north was highly industrial in nature, as this would not provide a pleasant “gateway” to the town for visitors entering the town having visited the public facilities at the new reservoir site. Some of that broad location for growth already appears to be within the “grey zone” (for landscaping, facilities, infrastructure, and commercial), so it would make sense if this land was used to provide associated leisure facilities and jobs within the town.

LP47: Employment allocations in Chatteris

Title:		Position:	Senior Planner
First Name:	Reiss	Organisation:	Marrons Planning
Surname:	Sadler		
Comment	Neutral		
Land south of Chatteris			

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

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

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

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

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

Chatteris Link Road

Land south of Chatteris can assist in the facilitation of the delivery of a western link road connecting the A141 and London Road, through improvements and provision of an appropriate connection point on London Road and funding towards its delivery. The completion of the Chatteris Ring Road is a long-standing aspiration of the Town Council and is supported by local residents^{21 22}, and will significantly reduce the amount of through traffic thus improving the public realm and local environment.

Green Infrastructure and Open Space

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

Land south of Chatteris will support the local economy through the provision of new jobs in the construction phase,

LP47: Employment allocations in Chatteris

the provision of new homes for local employees, and increased local spend in the town centre.

Environmental Effects

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

Phasing and Delivery

Delivery of Land south of Chatteris would come forward in the latter stages of the Plan period once considerable progress has been made in the delivery of Phase One, including its infrastructure. This would allow for balanced and sustained growth of Chatteris throughout the Plan period, and help to better ensure that the Council are able to demonstrate a positive Five Year Housing Land Supply to 2040. In the absence of a delivery trajectory for the proposed allocations, it is unclear when it is envisaged that growth will come forward in Fenland District, however in line with the Framework sites should be identified to deliver in the latter stages of the Plan period

Title:		Position:	
First Name:	Kirsty	Organisation:	
Surname:	Patterson		
Comment	Support		
I support the decision to place Site 40284 (Land off Wenny Road) outside of the settlement boundary.			
Site 40284 must NOT be allocated for housing or included in the strategic allocation. The loss of biodiversity at the site cannot be mitigated against, contrary to policies in the existing and emerging local plans.			
Development of the land is clearly not viable as its inclusion in the previous local plan has not resulted in a satisfactory application. Cannon Kirk’s considerably low-ball offer of £28,000 in developer contributions reinforces the idea that development on this land is not financially viable and that profit cannot be made without the council and taxpayers picking up the bill for services, infrastructure, and affordable housing.			
When an Asset of Community Value nomination was made in 2020, owner Carole Eaton said in a statement that the land was being considered for development at the time of Arthur Rickwood’s death in 1965. She said that “the possibility of development was resurrected in the 1980s”. Hallam Land Management entered a conditional arrangement to build on the land in 1988 but withdrew in 1991. Grounds & Co then marketed the land and a 10-year option agreement was entered into in 2007. Again, development didn’t take place. The current application has now stalled. The number of failed attempts to bring forward development over many decades show that development of this land is clearly undeliverable. Inclusion in any strategic allocation would set the council up to fail in their objectives.			

LP47: Employment allocations in Chatteris

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

Comment **Neutral**

Suggested new site allocation. Please see attached plan and site shaded red.
This site is located directly adjacent to EEA1 (Honeysome Road Industrial Estate).

It is also located adjacent to proposed allocation LP47.01 (40497) which forms an extension to EEA1 and proposed allocation LP47.02.

The site is also within close proximity to the proposed BLFG (Policy LP45) to the south which limits impact of development on edge of the settlement.

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

The allocation of this site represents a proposed extension to EEA1 similarly to the proposed allocation LP47.01
Policy LP15: Employment Part A - Established Employment Areas (EEAs) states that:

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

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

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

LP47: Employment allocations in Chatteris

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

Comment

Support

Metalcraft is pleased that the Site has been put forward as a draft allocation for a mixture of employment uses (Use Classes B and E(g)) but would note that the Site itself has not been included in the Chatteris policies’ map but is in the interactive policies map. Metalcraft advises that the policies’ map is updated to reflect the Site as a proposed allocation. The proposed uses build on the existing employment area (the current Metalcraft facility) and also benefits from the recently approved NCTC.

maintains that ancillary uses should also be included as part of the proposed allocation. These ancillary uses include a pub (Use Class Sui Generis), a hotel (Use Class C1) and potentially local retail uses (Use Classes E). The inclusion of ancillary uses alongside the proposed employment uses will increase the sustainability of the Site by internalising trips. The nature and scale of uses would be carefully assessed to ensure that they would not adversely affect Chatteris town centre, they will simply be uses complementing the principal use for the Site (employment use).

The Vision document and Illustrative Masterplan has taken the draft Policy as a starting point and details a scheme which provides an attractive ‘gateway’ into Chatteris. The indicative masterplan builds on and complements the recently approved NCTC, which is set to be a landmark building.

The Vision Document and Illustrative Masterplan provide further landscaping details to provide an attractive new ‘gateway’ to Chatteris while also mitigating against the impacts of the development in the wider context. The landscaping has been designed so as to reduce the impact for both the neighbouring amenity and also the future uses of the Site. The landscaping also contributes towards the biodiversity net gain of the Site as well as maximising the benefits of key features such as the existing hedgerows and trees and the 20 foot drain.

The proposed draft Policy states that any application should be accompanied by a transport assessment, travel plan, a flood risk assessment, and an archaeological evaluation. These representations have been accompanied by Technical Reports for the above disciplines as well as an additional Ecological Report and their conclusions incorporated into the Vision Document and indicative masterplan.

These Reports demonstrate that there is no reason why the Site cannot be delivered as employment land during Fenland’s emerging Plan Period and therefore is entirely appropriate to be maintained as an allocation as the Local Plan progresses.

LP47.01

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 Chatteris Conservation Area lies to the east of the site.

Any development of the site has the potential to impact this Conservation Area and its setting and views into and out of the Conservation Area. 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:	Victoria	Organisation:	Barton Willmore
Surname:	Yeandle		

Comment Support

conclusion, Metalcraft welcomes the fact that the Site previously put forward through FDC's 'Call for Sites' has been allocated for employment uses in the Regulation 18 Draft Local Plan (draft Policy LP47.01). Metal craft share the Councils vision for the future economic vitality of the district and Chatteris and are fully committed to working with the Council and stakeholders to assist in the delivery of this. Metalcraft are a highly successful local business and employer and have already invested heavily with the CPCA in the future of Chatteris through the design and development of the North Cambridgeshire Training Centre.

The Vision for the Site is to build on the current operations and investment to deliver an Advanced Manufacturing Innovation Park in Chatteris. This will be the focal point for innovation cluster development, creating a unique opportunity to stimulate growth in the advanced manufacturing sector and supply chain and bring together businesses.

This Vision supports the Cambridgeshire and Peterborough Combined Authority's (CPCA) ambitions for the creation of innovation lauchpads within the Fenland area to stimulate economic growth. The new Innovation Park proposed is aligned with the Local Industrial Strategy for Cambridgeshire and Peterborough, working with both public and private sectors. It also reflects the findings of the Chatteris Masterplan that was produced by Cambridgeshire and Peterborough Combined Authority, Fenland District Council, Cambridgeshire County Council and Chatteris Town Council in 2019.

Whilst Metalcraft welcome and support the allocation of the site, in order to make the Site more sustainable and to increase internalised trips it is suggested that the uses are expanded to take into ancillary uses as set out. These will not adversely affect Chatteris's town centre but simply complement the proposed employment uses.

The Vision Document and accompanying Technical Reports have demonstrated that the proposed site is deliverable to provide commercial floorspace during Fenland's emerging Plan Period. The Vision Document includes an Indicative Masterplan, which demonstrates how the Site could come forward.

Metalcraft would welcome the opportunity to continue to work with FDC during the emerging Local Plan process.

LP47.02

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

LP47.03

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 these areas, careful consideration should be given to large scale development on the edge of this historic town and the impact that may have on the setting of the town, its conservation area and other nearby heritage assets. The bulk, scale and mass of employment development in edge of town locations within this flat landscape requires careful consideration and mitigation in terms of appropriate landscaping, planning, colour and form.

We welcome the reference to landscaping and planning in the policy criteria but suggest reference could also be made to building colour and form to reduce impact.

Suggested Change - Make reference to building colour and form to reduce impact.

LP47.04

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

Title:**Position:****First Name:**

Liz

Organisation:

ICIS consulting limited

Surname:

Dent

Comment**Object**

Correction required- confusing? :

(1) The site is described as "unit west of Jacks Fenland Way" yet is shown on the policies map as the area being the carpark to the north of Jacks (now Tesco, Pound stretcher, and Screw fix).

(2) The Permitted use is stated as as B8 Storage & distribution when the actual use of this area in accordance with the planning permission is class Retail development (E(a)).

We feel that the area as shown on the polices map needs to be redrawn to reflect its permitted use as illustrated on the attached plan.
