

## Part E - Policies Map

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

**Comment** **Object**

Settlement Boundary and allocations in Newton

The Settlement Boundary evidence report indicates that boundaries are selected to reflect the built and natural form of the village. In newton the eastern ends of the village specifically the norther side of church lane an around the junction with Rectory Road, and the junction Rectory Road with Chapel Lane id fairly comprehensively developed with only minor gaps giving potential infill opportunities, and is clearly part of the built form of the village. As such it should be included in the village boundary as per the attached plan.

It is also primarily flood zone 1 and so there is no flood risk grounds to oppose any minor infill opportunities that this extension of the boundary provides.

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

**Comment** **Support**

The Minerals and Waste Planning Authority supports the depiction of the MWLPA sites and consultation areas on the Fenland Policies Map.

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**Title:** **Position:**  
**First Name:** Adam **Organisation:**  
**Surname:** Belcher

**Comment** **Object**

LGS 1

I disagree that the meadow should be included for development. Why are you going against what 92% of Chatteris want!?

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## Part E - Policies Map

**Title:**

**Position:**

**First Name:** Barrie

**Organisation:**

**Surname:** Luck

**Comment**      **Object**

I object to the proposed settlement boundary around Tydd St Giles on two bases. Firstly, it is SO restrictive that it will effectively prevent all but the very tiniest infill and I'm not even sure that that is a possibility. I do not wish to see unlimited development of the village, but what you propose is just too tight a strangle hold. All villages need some scope to grow.

Here is my second objection. The current local plan, under which we work, does NOT have settlement boundaries, which has resulted in some unwelcome development. Kirkgate as a case in point, now known by many as "Millionaire's Row", for the large houses recently built there, which do not reflect the nature of the village. Yet the previous plan DID have them. My objection therefore is not to the presence or absence of boundaries per se, but to this total flip flopping of "policy", which alternates between no growth and unrestricted growth and back again. It's all famine or feast. What we need is sensible, but controlled growth, ideally spanning multiple local plans.

Whilst I am a member of TSG Parish Council, this is my personal view.

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**Title:**

**Position:**

**First Name:** Richard

**Organisation:**

**Surname:** Humphrey

**Comment**      **Object**

BACK ROAD MURROW - Potential building land excluded in draft map

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

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## Appendix 6

**Title:**

**Position:**

**First Name:**

Liz

**Organisation:**

ICIS consulting limited

**Surname:**

Dent

**Comment**

**Object**

Parking Standards

Class Ea Units over 2,000 sq. meters -

"One parking space for every 10 sq. meters of floor space" should be amended to

"One parking space for every 20 sq meters of floor space"

The proposed standard is too high, especially as alternative modes of travel should be promoted and encouraged.

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## SA

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

**Comment**      **Neutral**

The Sustainability Appraisal (August 2022) generally follows the requirements of the Strategic Environmental Assessment (SEA) Directive and Planning and Compulsory Purchase Act 2004, with regard to sustainability objectives, assessment methodology, consideration of relevant plans, policies and programmes and the SA Framework. The report addresses relevant Sustainability Appraisal themes and topics relating to the natural environment including biodiversity and geodiversity, agriculture, open space provision, transport, air quality, water resources and resilience to climate change and flood risk.

The SA concludes that Local Plan policies will bring many significant benefits including enhanced access to open space and BNG. In our view Plan policies are not sufficiently robust and prescriptive to guarantee delivery of significant enhancements in accessible open space and BNG. The SA records many negative effects for the natural environment; Plan policies should embed appropriate requirements to address these, for example existing natural features, including peat soils, should be retained and enhanced to create extensive on-site multi-functional green infrastructure, connected to the wider network, to form the framework for development.

Monitoring indicators should quantify losses and extent of any protection/enhancement of peat soils, through Plan development.

We have provided further advice on key policies relevant to Natural England's remit within Annex A of this letter.

Natural England will be pleased to meet with you to discuss how our advice could be taken forward through the next iteration of the draft Local Plan.

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## SA

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

**Comment**      **Neutral**

### CONCLUSION

Using six capitals thinking helps us to keep our responsibility to customers, communities, and the environment at the front of our minds when making business decisions. Using this approach to assess the priorities and principles of the emerging Local Plan, we find the following:

#### Natural

The Sustainability Appraisal (SA) provides a range of assessment objectives which includes objectives that aim to protect the natural environment, reduce vulnerability to climate change, and conserve and enhance water quality and resources. It is considered that this provides a sound basis for the assessment of Local Plan options when supporting evidence is available, and links to holistic projects such as the Future Fens: Integrated Approach are incorporated.

#### Social

Engagement with stakeholders is an iterative process through plan preparation, including through the Duty to Cooperate and Statements of Common Ground. We welcome continued dialogue with the Council, and we will support the plan process through the preparation of evidence to help deliver a sound local plan.

#### Financial

The strategic priorities of the emerging Local Plan are aligned with the SA objectives and include helping people gain access to a range of employment, education, and training opportunities. Water as a resource and through strategic supply side options presented by the proposed Fens Reservoir, is a key factor to be embedded within the Fenland economy. Through Wisbech Regeneration and Future Fens Integrated Approach, Anglian Water continues to collaborate to inspire broader change and transformation to drive socio-economic regeneration in Fenland.

#### Manufactured

The plan should consider the impact and long-term resilience of new development and its spatial distribution, in terms of capital (embedded) carbon for new development and the infrastructure needed to support future growth.

#### People

The Plan and SA objectives to improve health and wellbeing, tackle equalities and encourage healthy choices, in addition to providing homes and employment to support people living and working in Fenland. The SA should ensure the Plan is developed in a way that enhance the knowledge, skills, and wellbeing of existing and new communities.

#### Intellectual

The SA demonstrates that the sustainability objective for 'water resources' is unknown/uncertain for the assessment of sites in the plan. An updated Water Cycle Study should help to provide a quantitative evidence base to inform the spatial distribution and phasing of growth and the compliance of the options proposed with the sustainability hierarchy.

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## SA

**Title:** **Position:** Senior Conservation Officer

**First Name:** Daniel **Organisation:** RSPB

**Surname:** Pullan

**Comment** **Neutral**

Sustainability Appraisal - Figure 8 Cumulative Effects of Proposed Sites, p.24>

Renewable energy allocations LP06.01/06.02 appear to have been excluded from this analysis – this should be remedied.

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**Title:** **Position:** Senior Conservation Officer

**First Name:** Daniel **Organisation:** RSPB

**Surname:** Pullan

**Comment** **Neutral**

Sustainability Appraisal - Sections 6.2 & 6.3

Refer to Figures 10 and 11 which do not seem to have been included in the assessment document. Also there is no mention of Figure 9 in the document.

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**Title:** **Position:** Sustainable Places Planning Adviser - Eas

**First Name:** Andrew **Organisation:** Environment Agency

**Surname:** Thornton

**Comment** **Neutral**

Sustainability Appraisal

There is no information on what indicators have been used to assess the positive or negative effects in relation to objective 5.1 (i.e. limit or reduce the vulnerability to the effects of climate change).

There are a lot of question marks next to the site allocations under columns 5.1 and 5.2 of the Sustainability Appraisal Framework, which relate to resilience to climate change flood risk. Please clarify the reason for this as it appears that these matters have not been properly considered and could affect the soundness of the Local Plan.

It appears that only the flood zones shown on our Flood Map for Planning have been used in the sustainability appraisal to assess flood risk effects. Please note that all sources of flood risk should be considered when applying the sequential approach, including surface water flood risk, in accordance with paragraph 023 of the PPG on flood risk and coastal change.

It is unclear that the variation in risk within Flood Zone 3 been considered based on available hazard mapping. The revised PPG advises that it may be appropriate to consider this variation in risk within high and medium flood risk areas (see paragraph 024).

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## SA

**Title:** **Position:** Senior Conservation Officer

**First Name:** Daniel **Organisation:** RSPB

**Surname:** Pullan

**Comment** **Neutral**

Sustainability Assessment - Characterisation of Fenland – 6. Land use and Wildlife, p.12-13

Key Opportunities here lists a set of habitats/species which have very little to do with interest features of the designated sites outlined. The Ouse Washes SAC and Nene Washes SAC are designated for their spined loach populations, the SPAs are designated for their breeding wader and wintering wildfowl populations.

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## HRA

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

### **Comment**      **Object**

The HRA (August 2022) Appropriate Assessment concludes that with policy requirements, including project level HRA, the draft Local Plan will not adversely affect the integrity of either the Nene Washes SPA and Ramsar site or the Ouse Washes SPA and Ramsar site, through impacts to functionally linked land, recreational disturbance, water quality impacts and urbanisation. Deferring assessment of the effects of Plan allocations to the project stage poses a risk to the deliverability of these sites. A strategic in-combination assessment, with mitigation measures to address any adverse effects embedded in Plan policies, would provide a more robust approach.

With regard to water resources section 7.5.30 of the HRA indicates that Anglian Water's WRMP explicitly accounts for the growth predicted by Fenland and other LPAs, and that 'in combination' effects between the Fenland Local Plan and other Local Plans due to the amount of proposed growth proposed are unlikely to occur.

However, Natural England's understanding is that the relevant River Basin Management Plans identify that current levels of water abstraction are having an adverse effect on the natural environment and set out the actions needed to tackle them including strategic alternative supply options, such as the proposed Fens Reservoir, which are likely to have long timeframes for implementation. In the meantime, interim measures need to be identified and implemented to ensure further growth through Local Plans is sustainable. Additional abstraction to meet development needs must demonstrate that it will not contribute to the further deterioration of the water environment and dependent designated sites and priority habitats. Natural England will not support development likely to have an adverse effect on the natural environment.

The HRA considers that the Local Plan is not expected to result in significant adverse effects on the integrity of the Nene Washes SAC, SPA and Ramsar or Ouse Washes SAC, SPA and Ramsar as a result of air pollution from increased traffic. Potentially affected areas of habitat are a very small part of the overall SACs and SPAs. The HRA concludes that with integrated mitigation measures embedded within the Plan, including requirements for project level Air Quality Assessment, and predicted future reduction in emissions, there will be no adverse effect on the integrity of these sites through air quality. We note that the assessment is not based on any traffic modelling or prediction of exceedance of the sites' critical loads and levels for Nox, NH3 and N and acid deposition. As a minimum the assessment should consider the sensitivity of the potentially affected habitat, indicated on APIS, to increases in these emissions and depositions.

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