

Thank you for consulting the County Council on the addendum to your emerging Core Strategy. The officer-level comments below are made on a without prejudice basis.

As you will be aware the County Council has responded to previous iterations of the Core Strategy in September 2012 and March 2013 (see attached).

While the proposed addendum (i.e. the removal of the North –East March allocation) is unlikely to raise any strategic cross-boundary issues, it does raise the question as to where the remaining housing numbers will be re-distributed elsewhere in the District. Given that there are cross-boundary issues regarding proposed growth in and around Wisbech, it is felt that any potential re-distribution of housing in this area would require further discussion with Norfolk County Council on:

- (a) Possible education delivery issues; and
- (b) Transport issues relating specifically to the A47.

I note your comments on the District Council's Strategic Housing Market Assessment (SHMA), which is not considered to raise any strategic cross boundary issues beyond those already identified through the Local Plan process above.



Fenland District Council

FENLAND CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT
(Proposed Submission Version)

Addendum relating to North-East March Allocation

Representation Form

Please return your completed form by one of the following methods:

By post to: Neighbourhood Strategy (Planning Policy) Team,
Fenland District Council, Fenland Hall, County Road,
March, Cambridgeshire, PE15 8NQ

By e-mail to: neighbourhoodstrategy@fenland.gov.uk

Representations must be received by 5pm on Wednesday 7th August 2013

Representations should relate only to the Addendum. This is not an opportunity to submit representations on the remainder of the Proposed Submission Version of the Core Strategy. Previous representations made on the Proposed Submission Version will be taken into account and forwarded to the Planning Inspectorate. It is therefore not necessary to repeat representations previously made.

PART A: PERSONAL DETAILS

Signature:	Date:
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1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes in the first column below, but complete the full contact details of the agent in the second column.*

Please note that as this is a public consultation your details and comments will be available for others to see.

Title	Mr
First Name	Neil
Last Name	Campbell
Job Title (where relevant)	Senior Planning Officer
Organisation (where relevant)	Norfolk County Council
Address Line 1	County Hall
Line 2	Martineau Lane
Line 3	Norwich
Post Code	NR1 2SG

Telephone Number

E-mail Address

PART B: REPRESENTATION

Please repeat your Name or Organisation:

3. Did you submit representations on the Proposed Submission Version of the Core Strategy during the public consultation (28 th February – 10 th April 2013)?	Yes:	<input type="text"/>
	No:	(please go to Q6)
	Don't know	(please go to Q6)

4. Did you submit a representation relating to the North-East March Allocation (in Policy CS9 – March)?	Yes:	<input type="text"/>
	No:	<input type="text"/>

5. If you submitted representations on the North-East March Allocation, do you want the comments you make below to replace those previously made (in so far as they relate to the North-East March amendments)?	Yes:	<input type="text"/>
	No:	<input type="text"/>

6. Do you support the amendments to the Proposed Submission Version as set out in the Addendum relating to North-East March?	Yes:	<input type="text"/>
	No:	<input type="text"/>

7. With the addition of the amendments in the Addendum do you consider that the Fenland Core Strategy is legally compliant?	Yes:	<input type="text"/>
	No:	<input type="text"/>

8. With the addition of the amendments in the Addendum do you consider that the Fenland Core Strategy is sound?	Yes:	<input type="text"/>
	No:	<input type="text"/>

9. If you consider the Fenland Core Strategy with the addition of the amendments in the Addendum is **not sound**, please identify your reason(s) for this by ticking the appropriate box(es). Please see the Guidance Notes to help you decide.

In my opinion, the Core Strategy is not:

Positively prepared: Justified: Effective: Consistent with national policy:

10. Please use the box below to set out your reasoning behind your response to Q7, Q8 and/or Q9.

Continue on extra sheets/expand box if necessary

11. If you think that the Fenland Core Strategy (with Addendum) needs further changes, please set out what you consider the change(s) should be to make it legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on extra sheets/expand box if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

12. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the forthcoming public examination (or can it be considered by written representations)?

NO , I do not wish to participate at the oral examination:			
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13. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Continue on extra sheets/expand box if necessary

Please note that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**Please make sure you have signed and dated
the front page of the form**



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1. Introduction

- 1.1 Fenland District Council has published an Addendum to its Core Strategy – Proposed Submission Version. The Proposed Submission Version was originally consulted on between 28th February and 10th April 2013.
- 1.2 The amendments in the Addendum propose to remove the North East March Allocation (in Policy CS9 – March) from the plan and re-distribute housing numbers within the town.
- 1.3 At this stage, we are seeking views ('representations') as to whether you consider the Core Strategy document (incorporating the amendments in the Addendum) to be legally compliant and sound, before we submit the document to the Secretary of State for Communities and Local Government.
- 1.4 Please note that representations in this consultation should relate only to the Addendum. This is not an opportunity to submit representations on the remainder of the Proposed Submission Version document. Previous representations made on the remainder of the Proposed Submission Version are still valid and will be forwarded to the Secretary of State. It is therefore not necessary to repeat representations previously made.
- 1.5 It is not the task of the Council to consider the representations. The Secretary of State will arrange for an independent Planning Inspector to examine the Fenland Core Strategy document and the representations that are received (whether from the consultation earlier this year or this consultation). The Planning Inspector will determine whether or not the Fenland Core Strategy is legally compliant and sound.

2. Part A of the Representation Form

- 2.1 You should sign and date the front page of the form under the heading "PART A: PERSONAL DETAILS".

2.2 Enter your personal details in the first column of the front page. If you are using an agent (such as a planning or property consultant), or if you are an agent acting on behalf of a client, enter the agent details in the second column, and only complete the title, name and organisation of the person or body making the representation in the first column.

3. Part B of the Representation Form

3.1 Please repeat your name or organisation in the box at the top of the second page. (We ask this because if we need to put a copy of your form onto the Council's website, we can omit the first page, so that your full personal details are not displayed.)

3.2 In Questions 3 and 4 please advise whether you previously made comments on the Proposed Submission Version of the Core Strategy (between February 28th and April 10th 2013), and whether these related to the North East March Allocation under Policy CS9 – March of the document. This will allow us to identify your previous representation where relevant.

3.3 If you did make comments to us previously about the North East March Allocation please state in Question 5 whether you would like your new representation to supersede your previous one. If so, your previous representation relating to North East March will be set aside and will not be forwarded to the Secretary of State.

3.4 In Question 6 please state whether you support the amendments contained in the Addendum to the Core Strategy.

3.5 In Question 7 please say whether you consider the Core Strategy (with the addition of the amendments contained in the Addendum) to be **legally compliant** or not.

You should consider the following before making a representation on legal compliance:

- The proposal to prepare a Core Strategy should be within the current Fenland Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the planning documents it proposes to produce over a 3 year period.
- The process of community involvement in preparing the Core Strategy should have been in general accordance with the Council's Statement of Community Involvement (SCI). The SCI is a document which sets out the Council's strategy for involving the community in the preparation and revision of Local Development Documents and the consideration of planning applications.
- The Core Strategy should comply with the Town and County Planning (Local Planning) (England) Regulations 2012 (as amended).
- The Core Strategy should be accompanied by a Sustainability Appraisal Report. This identifies the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The Core Strategy must have regard to national policy.
- The Core Strategy must have regard to the Fenland Sustainable Community Strategy.

3.6 In Question 8 please say whether you consider the Core Strategy (with the addition of the amendments contained in the Addendum) to be **sound** or not (see paragraph 3.7 below).

3.7 If you have answered 'Yes' to Question 8, please move to Question 10. If you have answered 'No', please identify in Question 9 why you consider the Core Strategy is not sound, by reference to one of the four national tests of soundness.

The tests of soundness are set out in the National Planning Policy Framework (NPPF)¹ (paragraph 182). This explains that "The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal

¹ View NPPF at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is 'sound', namely that it is:

- **Positively Prepared** - the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.”

If you think the content of the Core Strategy (with the addition of the amendments contained in the Addendum) is not sound because it does not include a policy (or land allocation) where it should do, you should go through the following steps before making a representation:

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so it does not need to be included.
- If the policy is not covered elsewhere, in what way is the Fenland Core Strategy unsound without the policy (or land allocation)?
- If the Fenland Core Strategy is unsound without the policy (or land allocation), what should the policy say (or where should the land allocation be)?

- 3.8 At Question 10 there is space for you to explain the reasons why you consider the Core Strategy (with the addition of the amendments contained in the Addendum) is, or is not, legally compliant or sound.
- 3.9 At Question 11 there is space for you to explain what change to the document you consider is needed to make it legally compliant or sound.
- 3.10 You should make it clear in what way it is not sound having regard to the legal compliance check and the soundness tests set out above. You should try to support your representation by evidence. It will be helpful if you also say precisely how you think it should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.
- 3.11 Where there are groups who share a common view on how they wish to see the Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 3.12 In Question 12 please say whether you consider it necessary to take part in the oral part of the examination into the Core Strategy (i.e. the hearing sessions). You should answer 'No' if you are content for your written representation to be considered by the Inspector, without having to take part in the hearing sessions.
- 3.13 If you have answered 'Yes' to Question 13, please explain why you consider it necessary to take part in the hearing sessions.

Thank you for consulting the County Council on the addendum to your emerging Core Strategy. The officer-level comments below are made on a without prejudice basis.

As you will be aware the County Council has responded to previous iterations of the Core Strategy in September 2012 and March 2013 (see attached).

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Signature:	Date:
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1. Personal Details*

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Please note that as this is a public consultation your details and comments will be available for others to see.

Title	Mr
First Name	Neil
Last Name	Campbell
Job Title (where relevant)	Senior Planning Officer
Organisation (where relevant)	Norfolk County Council
Address Line 1	County Hall
Line 2	Martineau Lane
Line 3	Norwich
Post Code	NR1 2SG

Telephone Number

E-mail Address

PART B: REPRESENTATION

Please repeat your Name or Organisation:

3. Did you submit representations on the Proposed Submission Version of the Core Strategy during the public consultation (28 th February – 10 th April 2013)?	Yes:	<input type="text"/>
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NO , I do not wish to participate at the oral examination:			
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