

Fenland District Council Local Plan Core Strategy – Proposed Submission Consultation (February 2013)

Memorandum of Agreement (MoA) between Fenland Council and Cambridgeshire County Council

Introduction

This MoA sets out Cambridgeshire County Council's (CCC) proposed submission representations in full, the associated 'rep number' and an agreed way forward on each element.

Please note that the representations below are set out in **representation ID order**, and not necessarily in the precise order as set out in the single paper received from CCC.

In order to bunch similar issues together (eg, where CCC made representations on a specific policy, but made comments on it in several different places within their single representation), these issues have been collected together to form a single representation with its own unique representation ID. It may therefore be appropriate for the reader of this MoA to first read CCC's original representation in full before turning to this MoA.

Public Health

We welcome the emphasis placed on health and wellbeing in this document and the evidence based report that supports this. We have a number of comments /suggestions that would provide further support to this approach as well as providing some more general comments on the Local Plan and associated local documents: Planning Policy Library, Sustainability Appraisal and Health and Wellbeing Policy Evidence Report.

As part of the planning policy library we suggest the following additional documents are referenced as evidence base/ background documents:

County

JSNA New communities 2010 <http://www.cambridgeshirejsna.org.uk/currentreports/new-communities>

This includes recommendations for social infrastructure and social inclusion

Health and wellbeing Strategy 2012 - 2017

<http://www.cambridgeshire.gov.uk/council/partnerships/health-wellbeing-board.htm>

Priority 5 particularly focuses on land use planning and environmental issues

Cambridgeshire Gypsy and Travellers Strategy (sorry don't have reference at this point)

Analysis of accessible natural greenspace provision for Cambridgeshire and Peterborough Report.

Natural England 2012 - attached

National

Healthy lives, healthy people: our strategy for public health in England published July 2011

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_121941

Fair Society Healthy Lives – Marmot Review 2011

<http://www.instituteoftheequity.org/Content/FileManager/pdf/fairsocietyhealthylives.pdf>

These national documents are important as they provide the framework for our approach to Public Health including methods for monitoring Public health outcomes.

The Marmot Report describes how health inequalities are underpinned by social inequalities and social determinants. The local plan describes these determinants in its model on page 16 of the Local Plan.

Fire Prevention Policy Omission – including sprinklers

An objection is made to the plan on the basis it omits a planning policy to adequately addresses fire prevention for new build development, one means of which is to incorporate sprinklers into all new buildings.

Evidence shows that the minimal costs of actively addressing fire prevention through measures including installing sprinklers into all new houses far out ways the cost of either retrofitting measures or dealing with the consequences of fire.

Public Open Space

The provision of good quality public open space, which is well integrated and landscaped which is provide in association with new development can and does meet a multitude of uses and demand. In relation to the health and well being of the population, public open space has an amenity, play and social value to the new community it serves and will be cherished and used for different purposes by the different sectors and age groups in society. It is vital that the Council provides for open space within new developments to be provided and maintained for the long term health, play and amenity functions they are.

Specific Comments

At 2.16 we suggest that the IMD data is also expressed using a map of Cambridgeshire as this

spatial representation adds clarity and makes this more powerful. The IMD data also demonstrates health inequalities and would sit well next to paragraph 2.13.

Within the objectives in 2.4 we suggest amending to: Healthy, Inclusive and Accessible Communities.

At 6.3 “*Redress inequalities related to age etc.*” we suggest adding *health* to this line.

Policy CS2 Facilitating Health and Wellbeing for Residents

We support the approach that the design and access statement will be subject to a health impact assessment (HIA) to ensure that the criteria in the health policy are met. However, we do suggest that the bullet points in the policy are set out in more detail if they are to be used as a checklist.

We require amendments to policy CS2 which have been inserted **in red** although we recommend that more detailed work is done to develop the checklist to ensure no aspects are overlooked, e.g. expanding the lifestyles section to describe the components relating to diet, physical activity and drug and alcohol issues. Providing this detail is particularly important if an external agency is given the HIA brief.

CS2

Development proposals should positively contribute to creating a healthy, safe and equitable living environment by:

- creating an environment (**built and social**) in which communities can flourish (see all policies in this plan);
- creating sufficient and the right mix of homes **and affordable homes** to meet peoples needs, and in the right location (see CS3, CS4 and CS5)
- **planning housing that reflects the changes that occur over the lifetime so people are not excluded by design as they grow older and frailer or as their circumstances change. assisting people to live in their homes for as long as possible** (‘lifetime homes’) (see CS5);
- building homes which are easy to warm (see CS14(A)) and safe from flooding (see CS14(B))
- promoting high levels of residential amenity (see in particular CS7 and CS16);
- creating opportunities for employment in accessible locations (see CS3 and CS6)
- promoting and facilitating healthy lifestyles **including measures to promote active transport such as walking and cycling** (see, for example, CS7, CS15 and CS16);
- providing good access to health, leisure and recreation facilities (see, for example, CS7, CS13 and CS16);
- **providing access to a mixture of formal and informal green spaces that are well connected to existing networks**
- providing and maintaining effective, sustainable and safe transport networks to ensure access to all essential services (see CS15);
- helping to reduce crime, the fear of crime and anti-social behaviour (see CS17);
- considering the equality and diversity requirements of residents and local communities (see, for example, CS5, CS7, CS16 and CS17); and
- avoiding adverse impacts (see in particular CS16);

Comments on above edits:

- The inclusion of built *and social* environment has been included to take on the recommendations of the New Communities JSNA which puts an emphasis on the importance of the social environment. The JSNA recommends the resourcing of community development roles and approaches to promote social inclusion and the mental health and wellbeing of new residents.

- The text on lifetime homes has also been amended to be more in line with the JSNA New Communities recommendation.
- The association between health and wellbeing and green space is strong. The additional point on green spaces suggested for the policy is taken from the New Communities JSNA. Natural England has mapped natural Green Space provision in Peterborough and Cambridgeshire and showed that Fenland has the least access (see Analysis of accessible natural greenspace provision for Cambridgeshire and Peterborough Report attached received Jan 2012– this is a final report but at the stage of receiving it had not been 'branded').

Health Impact Assessment – Omission Objection

An objection to the Plan is made on the basis of an omission of not having a Health Impact Assessment policy. The Health Impact Assessment can also be incorporated in the Strategic Environmental Assessment process (which addresses human health) and through the Sustainability Appraisal (SA) which also addresses SEA requirements. Thus, the SA for this Plan has a section on Healthy Inclusive and Accessible Communities (page 98) with decision making criteria that can be usefully cross referenced to (and inform) the health policy above.

Policy CS2 Facilitating Health and Wellbeing of Fenland Residents

Monitoring effectiveness

One of the recommendations for the JSNA for New Communities is to ensure resources for community development roles to support social inclusion and wellbeing in new communities. This recommendation includes using '*people proofing*' principles to monitor people outcomes and puts the community at the heart of the process. Community development actions are designed to achieve People outcomes which include:

I can meet up with people I know; I can meet new people; I can have a say on how things are run around here; I can run things around here; I can easily get the information I need (and easily get to facilities) for health; leisure; transport; housing; education; environment etc; I know who to go to for help with...

The effectiveness of the Community development approach is assessed by monitoring actions against outcomes which are then reviewed with the community (using an annual survey). Actions can then modified or changed as appropriate and are continually reviewed.

This takes monitoring beyond ensuring there is built infrastructure to ensuring that the community is inclusive and thriving. It would be good to see this JSNA recommendation for monitoring healthy communities implemented in Fenland.

Health and wellbeing evidence report

This document very helpfully maps the references and links to health in the NPPF.

We suggest that the JSNA new communities document is referenced under 1.7. This document has a particular emphasis on social inclusion and the importance of green space.

JSNA New communities 2010 <http://www.cambridgeshirejsna.org.uk/currentreports/new-communities>

[Sections 2.3/2.4 Under the Fenland context, we would suggest that references to *health inequalities* are specifically made as this is a very significant issue for Fenland. It would be helpful to demonstrate this using mapped IMD data \(as mentioned in comments on the Local Plan\).](#)

[Another significant health inequality for inclusion relates to access to natural green space \(see previous comments on green space and ref under Planning Policy Library\).](#)

We also suggest that the document recommends that it is *read in conjunction with the Local Plan* as this provides further context and the explanation of the social determinants of health. Alternatively, this aspect could helpfully be added to the document to make it more 'stand alone'.

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Adult Social Care

Policy CS2 has acknowledged the fundamental importance of health and wellbeing to the future prosperity of the District.

It is essential to point to key indicators from the 2011 Census relating to the following key characteristics for the demographic profile for the area:

- Residents with a long term activity-limiting illness % total by ward
- Residents providing 50+ hours of unpaid hours of unpaid care per week % of total
- One person households Aged 65 and over by ward
- Percentage of households Aged 65 + by ward

The primary data shows a marked cluster of wards in Fenland with an ageing population for whom the quality of life is limited with a high dependence on unpaid care. This also impinges upon economic activity rates.

Agreed way forward

CCC Position:

Objection maintained. CCC consider plan unsound without amendments made.

Specifically:

CCC maintain their objection to a lack of a policy requiring a Health Impact Assessment with each development – plan unsound without it.

All other issues raised in the above objection are withdrawn, though they remain advisory comments and CCC would welcome amendments. However, plan not unsound without such amendments.

FDC Position:

FDC does not consider it appropriate that all new development should be subject to a HIA and considers that the threshold for where a HIA would be appropriate is appropriately set at 250 homes in Policy CS2.

With respect to other non-objection issues raised, FDC proposes to support some of the amendments to Policy CS2. These amendments do not fundamentally amend the thrust of the policy, but help clarify intent. The changes are therefore offered as minor amendments to the Core Strategy and set out in the associated schedule. Those parts suggested but not included have not been suggested because they are covered by existing points in the policy.

Policy CS19 - OBJECTION

We welcome the inclusion of a "natural environment" policy. However, it is considered that the policy should reflect local circumstances and characteristics; the aim of the NPPF policies is highlight the importance of the local context, particularly for those habitats and species for which this area is nationally important, and how these link to a landscape approach for nature conservation. Without this evidence base, it is impossible to ascertain the priorities for nature conservation in the local area, including their ecosystem benefits, and how they can be achieved through the planning process. It is equally important to consider geodiversity.

The Green Infrastructure Strategy has been developed and adopted for Cambridgeshire and Peterborough and it would be appropriate to acknowledge this within the accompanying text and policy

Similarly, the policy does not acknowledge or reflect the work being undertaken by the Fens for the Future Partnership to *"see sustainable wetlands restored, re-created and reconnected across the Fens for the benefit of people, our natural and historic heritage and the rural economy"*. Of particular relevance is their recently published Strategic Plan to help identify the top priorities for biodiversity action across the 'inland fens' of the Fens National Character Area.

The Green Infrastructure Strategy and Fens for the Future Partnership work provides an excellent opportunity to enhance the biodiversity value of Fenland, as well as improve wider environmental, social and economic aspects of sustainable development. It would also provide an excellent evidence base for future biodiversity compensation schemes, such as biodiversity off-setting.

The Natural Environment policy within the Fenland Local Plan should minimise impact on both biodiversity and geodiversity (in accordance with section 117 of the NPPF), including:

- plan for biodiversity at a landscape-scale across local authority boundaries;
- identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;
- aim to prevent harm to geological conservation interests.

Agreed way forward

CCC Position

Objection withdrawn.

CCC regards comments as being advisory but would welcome changes to plan to accommodate them. However, plan not unsound if changes not made.

FDC Position

No change to the Core Strategy

The emerging Local Plan will help to shape and direct development in the district for the next twenty years, hence the importance of ensuring that the appropriate infrastructure supports growth and regeneration of Fenland District. With regard to the 'major developments', it is essential that the necessary infrastructure is delivered effectively and efficiency, and the best way to secure this is through the means of planning agreements often referred to as Section 106 legal agreement. Consequently it is fundamental the new Plan has a clear policy which specifies exactly what infrastructure should be provided through S106, which will need to include schools, libraries, health facilities, as well as on site sustainable urban drainage and public open space. In relation to the dispersed housing strategy with such a significant reliance on unallocated and the approach taken in specifying undefined broad locations for housing does make the proper planning for necessary infrastructure requirements associated development very difficult and will necessitate the need for investment to be secured through the introduction of Community Infrastructure Levy. The County Council will work with the District Council to not only identify the infrastructure needs of the District but also the most appropriate means to ensure the new schools road etc are properly planned for funded and delivered.

Planning Obligation Policy – Omission

An objection to the Local Plan is raised on the basis the Local Plan does not have a clear policy on planning obligations. In a mixed economy where infrastructure provision is provided by a combination of Community Infrastructure Levy contributions and S106 planning obligations it is important to clarify through a policy the requirements. In relation to education provision it is essential that new schools are provided for on the largest sites and this provision is secured through a S106 legal agreement.

Proposed Planning Obligation Policy

When granting planning permission, the Council may seek planning obligations from applicants and developers in accordance with Government policy and regulations. All such obligations must meet the five test set out in regulations. Obligations may be sought to secure one or more of the following:

- Community hub facilities including library and public health services;
 - Education facilities including primary, secondary and special schools;
 - Sport, leisure, open space and recreation facilities;
 - Transport infrastructure;
 - Flood mitigation and improvement measures, and;
- Environmental improvements.

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Telecommunication & Connectivity Objection

The preamble to Plan refers to the importance of Broadband but falls short in having a clear policy in the Plan to clarify exactly how this will be delivered as and when new development proposals come forward. In the context of the delivery of Broadband infrastructure to be delivered across Cambridgeshire the lack of a clear policy is an omission which needs to be addressed. Any new residential and commercial development will require the necessary Broadband to connect with the new site to take advantages of services and facilities Broadband provides for.

Education

The overall level of housing growth proposed (11,000 dwellings) produces an overall demand for school places of approximately 16 forms of entry (primary and secondary) using the County Council's standard multiplier. This can be broken down across the main area of development (the market towns) as follows:

- **Wisbech**
4 - 5FE of primary and secondary school places

- **Kings Lynn and West Norfolk Borough Council area**
0.7 - 1FE of primary and secondary school places. For school place planning purposes it is assumed that these children will attend schools in Wisbech as the development is intended to function as an urban extension to the Town.
- **March**
7FE of primary and secondary school places
- **Chatteris**
2.2FE of primary and secondary school places
- **Whittlesey**
1.5FE of primary and secondary school places.

Limited expansion of provision may be required to support allocations in village communities but the quantity and distribution of development is uncertain (both windfall and broad locations) and, therefore, figures for the number of places arising from such development remain uncertain for any one location which make the education school planning process extremely difficult. However, what is known is that this additional undefined development will produce the need for extra school places which not identified in the figures for the market towns set out above.

The additional school places required, need to be viewed within the overall pupil place planning context for Fenland. There is very little spare school capacity throughout the Fenland market towns other than in Whittlesey. In March, Wisbech and Chatteris the County Council is already planning for the expansion of school provision to meet the needs of the existing population. New primary schools will need to be planned for and sites properly allocated within the local plan clearly showing the intended location within the Plan. The reference in policy CS7 (f) is not sufficient to provide certainty of site or set the land value. New school sites where required to meet the demands arising from the children of these new housing sites will need to be funded through the mechanism of S106 legal agreements on the larger sites and through CIL contributions elsewhere, the only exception being Whittlesey.

With regard to the planning strategy, the approach taken by Fenland is a flexible one and it appears that the District Council is prepared to consider higher growth than the 11,000 dwellings up to 2031 through future reviews of its Core Strategy if the market will sustain this. To support this approach, the District Council will need to be flexible in its approach to the provision of supporting infrastructure and particularly the allocation of sites for schools. The sites allocated must take account of the potential for future growth and not restrict the capacity of sites to serving the early housing or the development first out of the blocks. If FDC wish to retain flexibility on housing numbers there is an obligation to support service providers in being able to respond. The Plan as presented has considerable uncertainty and lacks the detail and clarity for Cambridgeshire County Council as the education authority to be able to properly plan ahead for new and expanded school provision to meet the future needs of Fenland.

The Core Strategy remains a mix of strategic sites and areas of search for new development. This introduces an element of uncertainty about the location of future development outside the strategic sites and overall housing capacity in these sites. This is acknowledged by the District Council itself in the further assessment work it identifies as required on the potential to locate 3,000 houses in the west of Wisbech. There is a stated intention to review the Core Strategy should this level of development not prove to be possible. In these circumstances, to safeguard the County Council's position there should be a presumption in each of these areas of search that a primary school site will be required. It cannot be assumed that the primary schools planned in the strategic sites can also meet the demand for places arising from developments that come forward in the broad areas of search. If any site is subsequently not required the land can be returned to a developer for housing. Public service and infrastructure providers in this instance the County Council should not be expected or presumed to carry the risk when future

levels of development and the pattern of development are uncertain. The dispersed and uncertainty nature of the District Council housing strategy is not conducive to the proper planning for the future infrastructure needs of the District.

It is our understanding that the inclusion of Policy CS7 (f) provides the basis for achieving the appropriate level of early years, primary and secondary school provision required to mitigate the impact of proposed development.

The Core Strategy's commitment to the preparation of comprehensive schemes or SPDs for major urban extensions is welcomed; the submission of major planning applications without the full supporting evidence compromises stakeholders and other parties responsible for service delivery and infrastructure. However, this does not negate the need to have a planning policy contained within the plan which clearly sets out the infrastructure requirements applicable for section 106 legal agreements.

The District Council should note that expansion of some of the villages highlighted as suitable for development in the settlement hierarchy are problematic in terms of expanding primary school provision. The scope for further development at the primary school sites in Doddington and Manea is limited. However, it is considered that the expansion of the primary schools in Wimblington and Wisbech St Mary would be easier to achieve by virtue of the overall site configuration and/or the fabric and condition of the existing buildings.

The following are key issues relating to the duty to co-operate. For the purposes of planning school provision, the allocations in the Borough Council of King's Lynn and West Norfolk area need to be regarded as part of an urban extension to Wisbech. The residents in these areas will consider themselves as part of the town and its community. This will increase the total demand for new places in Wisbech by a further 0.7FE - 1FE. The local planning authority has identified the need to work with the neighbouring district council to bring forward a single development scheme for these cross border allocations., The type of funding mechanisms to be put in place to secure the necessary section 106 or CIL payments from King's Lynn and West Norfolk Borough Council to fund the new or expanded school provision in Cambridgeshire's schools within Wisbech are of equal significance.

The main post 16 provider, COWA, has a campus in King's Lynn and Wisbech and the planning of provision and investment of 106/CIL proceeds will again need to be considered by the four authorities involved (Norfolk CC, Cambs CC, FDC and KL&WNBC). This should also embrace the condition of the existing fabric.

In relation to funding, the current pressure on school places has also required the County Council to invest capital funding in the expansion of schools far in excess of the allocations it receives from Government. This has been funded in the current capital programme through increased borrowing. This situation cannot be sustained indefinitely by the County Council and there are no alternative sources of funding. The development of an infrastructure plan to provide a framework for developer contributions to public infrastructure (section 106/CIL) is, therefore, welcomed.

The County Council will be commenting separately on the Infrastructure Plan as the demand for places set out above will require modification to be made to the project list. The County Council would wish to work with the District Council to update the infrastructure plan to identify the future infrastructure needs for Fenland District.

Early Years Provision – Omission Objection

Section 7 of the Childcare Act 2006 requires local authorities to secure free early years provision for all eligible children. The growth projections of children requiring an early years place indicate that there will be a need for further pre-school provision across each of the towns. Where the growth is small it is hoped that need shall be met by existing provision but there may be restraints within an existing site / building that may be a barrier to expansion.

Where growth results in a larger need for places, a new provision may be needed. This will often result in the need for premises to be sourced or a site to be allocated by the District Council, which will then be taken up by a private early years provider. Across Fenland District sites will need to be allocated for early years provision for at least one early years site in each of the market towns and two sites allocated at Wisbech to reflect the scale of housing growth proposed. The omission of any sites being allocated for early years provision has generated an objection.

The County Council will assist the District Council to identify sufficient good quality sites in the Local Plan to meet the Childcare Acts requirements. One option is to identify sites which are either co-located on a school site or adjacent to an existing school. As often, as a result of the school expanding the early years provision is displaced. Existing school sites may not have the scope for expansion to meet the needs of both the early years provision and the statutory school provision.

Where new schools are being provided, provision for early years may be planned within the wider project. Should either inadequate school or pre-school site not be allocated this would result in an objection from the County Council.

Post 16 Provision

The Council welcomes the acknowledgement of the need for further investment in post 16 provision in Wisbech to improve the building stock at COWA's Isle College Campus. Although investment cannot be justified on the basis of future numbers of post 16 learners, without an improvement in the facilities at this site it will be increasingly difficult to maintain the current breadth of provision within the Town. These challenges should be viewed as capacity constraints for the purposes of the allocation of CIL/Section 106 funding.

Secondary School Provision

There is only limited potential for growth on the existing secondary school sites and limited spare capacity. Pupil forecasts for Wisbech and March suggest that in the long term there will be between 13 and 15 forms of entry (FE) of secondary age children requiring places in each Town (26FE to 30FE in total). At present each town is served by one large secondary school admitting 10FE (20FE in total). How the additional capacity required is provided for over this large geographical area, which covers two distinct communities, is one of the main issues for any review of secondary school provision. The Council welcomes the flexibility provided by the Core Strategy which references the need for a potential secondary school site in Wisbech and identifies land to provide additional playing field space for the Neale Wade School in March.

In Wisbech, the secondary school has historically had spare capacity, but the number of children age 11-15 living within its catchment area, already exceeds the number of places available. As the quality of secondary education is improved in Wisbech there is potentially an unmet need within the existing community. These issues are complex and the effects ripple out to neighbouring secondary schools hence the need to undertake a district wide review of provision as part of our response to the Core Strategy, which will commence within the next 12 months.

Special Education Needs – Omission Objection

Children and young people who have complex and severe special educational needs will be resident in new communities and it is imperative for them to be included in their local community to receive education for a number of reasons:

- Safeguarding – children/young people with complex disabilities and Special Educational Needs (SEN) grow up and are familiar within a community then it is likely that they will be “looked after” by that community.
- It is important to have friends locally and for families to be able to have access to their child/young person's school. Many special schools provide after school care thus supporting working parents.
- Children/young people with complex disabilities and medical needs do not have to travel

unnecessary distances so that safeguarding and risk is reduced especially as the number of poorly children/young people increases.

Having learning and physical disabilities is not dependant upon perceived social status or financial situations and therefore any new housing communities will have at least 20% children/young people with special educational needs and up to 4% needing highly specialist special school provision.

Families with children/young people with disabilities have told us from extensive consultation that they want their children/young people attending schools as close to where they live as possible. An increasing number of families now have a child/young person with complex learning difficulties and disabilities with as much as a 7% increase per year.

With a reputation for outstanding special schools, funding for SEN a priority and a renowned hospital, Cambridgeshire is attracting a high number of families with children/young people with very high level needs. These children/young people with complex and severe learning difficulties and disabilities require appropriate special school provision to be available. The schools must cater for children/young people from 2 years up to and over 19 years of age.

A holding objection is raised in relation to the omission in the Plan for not identifying a site for special educational needs of 2ha, in one of the larger market towns. A special school site is needed to address capacity constraints for pupils with special educational needs arising from planned growth in Fenland District. This requirement also needs to be included in the District Council Infrastructure list.

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The Local Plan identifies the need to secure infrastructure needs through the appropriate mechanism. The County Council welcomes this policy as development can create additional demand and adequate infrastructure and services will be required to mitigate the impact of the development and create sustainable communities. Developer contributions will play an important role in ensuring that funding can be secured from developers towards the infrastructure requirements of the Local Plan. However developer contributions are unlikely to cover the full costs of all infrastructure requirements and we are concerned over the lack of clarity of key transport infrastructure dependencies within the Core Strategy & Infrastructure Delivery Plan and the funding required to deliver these. It will be important to identify strategic infrastructure dependencies and requirements and identify priorities for funding with partners such as ourselves early to help ensure clarity over implementation and funding.

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In terms of the **Infrastructure Delivery Plan** we have the following comments:

3.2 As noted above this should read Market Town Transport 'Strategies' not 'Studies'.

4.14 Text here does not describe the junctions that will experience delay in the future very clearly.

4.16 Should be 'Strategy' not 'Study'

4.17 We suggest adding the following sentence to this paragraph:

'Cambridgeshire County Council committed at its cabinet meeting on March 5th 2013 to deliver A605 King's Dyke level crossing replacement scheme, subject to a funding package being agreed with partners including Network Rail.'

4.29 It should be noted that the Second March MTTTS is to be adopted in spring/summer 2013

while the second Wisbech MTTs is to be adopted in autumn/winter 2013.

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2. Chapter 5 Delivering Infrastructure

5.1.3 Libraries should be added to the list of facilities provided by the County Council

3. Infrastructure Delivery Plan Pg 60

We are pleased to see libraries are listed as a key element of the Infrastructure Delivery Plan

Agreed way forward

CCC Position

With respect to a lack of a Planning Obligations policy - Objection to be maintained by CCC. Plan considered unsound by CCC without amendments.

However, it is noted by both parties that further clarity on CIL and any associated developer contributions supplementary policy work is due to be announced by FDC shortly.

With respect to all commentary in relation to Education – Objections withdrawn, and comments regarded as advisory but would welcome changes to plan to accommodate them. However, plan not unsound if changes not made.

With respect to transport matters, Objection withdrawn. These matters are agreed to be covered in future updates of the IDP.

With respect to Broadband policy, Objection maintained. Broadband is a County Council priority and in the context of the forthcoming delivery of Broadband infrastructure across Cambridgeshire the lack of a clear policy is unacceptable. Any new residential and commercial development will require the necessary Broadband to connect with the new site to take advantages of the services and facilities Broadband provides for and this will be difficult to achieve without appropriate policy in place.

FDC Position

FDC considers the approach to developer contributions as set out in the Core Strategy to be sound, and will be supplemented by update supplementary policy (and possibly a CIL) in due course.

FDC agrees to work closely with CCC to ensure an up to date and thorough IDP remains in place.

FDC recognises the importance of broadband, and supports its roll out, but it is considered that the overarching infrastructure policy CS13 is sufficient for planning purposes. If broadband was singled out, either in CS13 or as a separate policy, it opens up the requirement for policies on all other forms of infrastructure. This would be contrary to the objectives of producing a clear and concise Local Plan.

FDC proposes no changes to the Core Strategy in respect of this representation.

Floods and Water

We welcome the fact that flood risk and SuDS themes are found throughout the document. The evidence base listed is also encouraging. We recommend that our Local Flood Risk Management Strategy, which does need to go through your member approval process, is considered as part of the evidence base. We also recommend that the EU Framework Directives (WFD) relating to Water and Waste Water are considered at all stages of the planning process. A basic premise is that there should be no detriment to the quality of water bodies and planning policies should uphold this Directive.

We also note that water efficiency is mentioned within Urban Extensions Policy CS7; due to supply and demand issues within the East of England, it is considered that management of supply and demand of water should be given more weight.

The following is a suite of water policies that Cambridgeshire County Council would like to recommend and promote throughout the County. However as Flood Risk and Water Management is dealt with in spatial policies within the Core Strategy it would be expected that these should be cross referenced to the thematic policies.

Flood Risk - this policy should build on that within NPPF and link with your SFRA and more recently our Local Flood Risk Management Strategy, where a key objective is 'appropriate development'. We also recommend using the Countywide Surface Water Management Plan and also the more recent March Detailed Surface Water Management Plan as part of your evidence base, as developments must consider all forms of flood risk including surface water.

Secondly, a Surface Water Runoff Control and Design Policy encompasses the need for SuDS and the principles required for developments, in order to ensure no new development or redevelopment results in increased runoff but offers betterment. Within this Policy we would recommend using Ciria guidance and any evidence from your Water Cycle Study (WCS). The SAB role, when implemented, will assist including the County SAB Handbook (yet to be published due to DEFRA delays).

This Council **objects** to the Plan on the basis of an omission in not having a Water Quality Policy. This must compliment the WFD and any work or recommendations from your WCS.

Fourthly we **object** to the Plan on the omission of not having a stand alone, water efficiency policy; as this is such an important issue for the East of England with low rainfall totals compared to the rest of the Country. We recommend that your WCS should be able to inform on any long term concerns with supply and demand and suggest whether code 4 or 5 is put forward for domestic water consumption.

Finally foul water supply and disposal is a key area of concern, so we recommend a policy to deal with foul water disposal.

We also recommend that the following are considered closely:

- Carbon implications of pumped drainage or tankering need addressing – encouraging a stronger emphasis on choosing gravity systems wherever possible, and to consider the residual risk of flooding when systems fail.
- We wish to see a policy protecting FRM assets (and potential future FRM assets in the CFMP) from being lost or prejudiced.
- A definition of safety and a presumption against any development that would rely on emergency services [to be safe] would be helpful. This might help emergency planners with concerns about resources to assess all applications to say one way or the other whether it is

safe. If sites are self sufficient in design and egress, that would be satisfactory and less reliant on relevant Risk Management Authorities.

- In combination with the NPPF, there is an increased burden of evidence falling onto the LPA and its advisers to support any decision – especially refusal. The plan could do significantly more to shift this burden (or at least the uncertainty of it) to developers and give a stronger push to getting pre-application advice. To tackle this we would recommend:

- A clear checklist for FRAs including Surface Water disposal in line with CIRIA 697 and the SAB Handbook when published, Foul drainage assessments, pollution management plans and water efficiency.
- A validation requirement for the above assessments so that the clock does not start until the reports accompany applications. (this would encourage pre-application discussion, especially if a letter of FRA conformity accompanies a submission).

The following Water Policies have been proposed and recommended to help address the Plans absence of adequate policy provision. The County Council would be willing to assist the District Council to provide the necessary range of policies required in this important aspect of the Plan. We would welcome the opportunity to meet with you and the Environment Agency and perhaps the water undertakers to make sure we have a joined up robust approach towards future Water Management in Fenland.

Flood Risk Policy

Development will be permitted if an assessment of flood risk is undertaken and the principles of NPPF have been followed and additionally:

Development will be permitted if:

1. It is not located within flood zone 3b, unless it is water compatible development or only essential infrastructure that meets the Exception Test (as listed in Table 2 of NPPF Technical Guidance) and does not increase flood risk elsewhere by either displacement of flood water or interruption of flood flows and has flood resilient and resistant construction and safe means of evacuation,

1a. Redevelopment within flood zone 3b will be permitted if:

- i) The existing development is still viable, such that it can be demonstrated that the redevelopment is from the same flood risk vulnerability classification, (as set out in Table 2 of NPPF Technical Guide) or there is a reduction in the vulnerability classification. No increases in vulnerability classification or intensity of use will be allowed. The redevelopment must not increase flood risk to its occupants or increase flood risk elsewhere by either displacement of flood water or interruption of flood flows and has flood resilient and resistant construction and safe means of evacuation,

And

- ii) Existing water edge building lines including boundary structures are retreated from the river's edge as part of the redevelopment, unless required for water compatible use, to allow restoration of the natural bank form and regular flood flow adjacent to the river.

And

- iii) Land adjacent to the river bank is opened up, where appropriate, for footpath use to encourage recreational use of the river, biodiversity enhancement and access for maintenance.

And

Development will be permitted if:

2. It is not located within flood zone 3a, unless it is water compatible or minor development ancillary to existing uses and does not increase flood risk elsewhere by either displacement of flood water or interruption of flood flows. Development in this category should have flood resilient and resistant construction and a safe means of evacuation.

And

3. It is located within flood zone 2 or any surface water wet spot (as shown on relevant Detailed Surface Water Management Plans, where undertaken) and has flood resilient and resistant construction as appropriate,
4. Floor levels are 300mm above the 1 in100 year flood level with climate change allowance/or at least 450mm above adjacent highways levels where appropriate,

Reference should be made in FRAs to the latest versions of the following:

Strategic Flood Risk Assessment

Surface Water Management Plans, including the Countywide and March Detailed Surface water Management Plans.

Great Ouse Catchment Flood Management Plan and Water Cycle Strategy

Local Flood risk Management Strategy for Cambridgeshire

Surface Water Runoff Control and Design Policy

Development will be permitted if FRAs clearly demonstrate that:

1. Options are fully explored at an early stage in site layout and design to ensure that surface water is managed as close to source as possible and demonstrated that the design has used the SuDS Hierarchy Management Train in accordance with The SuDS Manual (Ciria C697 or later versions). Surface water runoff is managed by Sustainable Drainage Systems (SuDS) must be an integral part of the development design and must be considered at the earliest opportunity.
2. Ownership and maintenance of the SuDS are considered as part of the design and are ready to be secured in perpetuity.
3. The peak rate of runoff over the development lifetime, allowing for climate change, is no greater for the development site than it was for the undeveloped site. For previously developed sites, a significant reduction over and above the effects of climate change will be achieved.
4. Post development volumes of runoff, allowing for climate change or the development lifetime, is no greater than it would have been for the undeveloped site. For previously developed sites, a significant reduction over and above the effects of climate change will be achieved.

Note for clarity: undeveloped means the site in its natural state prior to any development taking place.

5. The development is designed so that the flooding of property would not occur in the event of local drainage system failure (caused by either extreme rainfall or a lack of maintenance).
6. It is demonstrated that, through consultation with the appropriate responsible bodies, the discharge location has the capacity to receive all foul and surface water flows from redevelopment, without increasing the incidence of sewer overflows. This includes discharges by infiltration into water bodies and into sewers.

Planning applications submitted without an appropriate FRA will not be validated. Applicants are strongly advised to seek pre-application advice with relevant flood risk bodies to ensure that

FRAs include appropriate information to satisfy the requirements of the NPPF and this policy.

Reference should be made to the latest version of SuDS manuals including CIRIA and any associated local standards set by the SAB (SuDS Approval Body) when implemented (Cambridgeshire County Council).

Water Quality Policy

Development will be permitted if:

1. There is no discharge from the development into the receiving system off site, for the rainfall depths of 5mm.
2. The runoff from all hard services shall receive an appropriate level of treatment in accordance with The SuDs Manual (Ciria C697 or later versions) to minimise the risk of pollution.
3. Development adjacent to a water body actively seeks to enhance the water body in terms of its geo and hydro morphology, biodiversity potential and setting.
4. Watercourses are not culverted and any opportunity to remove culverts is taken.

Reference to the Water Framework Directive and associated River Basin Management Plans for Anglian Region must be considered. Where appropriate, assessments under the Water Framework Directive should be submitted with planning applications. Normally this would be included as part of the EIA process, but smaller developments close to the water environment may require preliminary assessment and, if potential impacts on ecological status are identified, a full assessment with appropriate mitigation measures will be required.

Water Efficiency Policy

Development will be permitted if submissions can clearly demonstrate that:

1. SuDS designs consider and prioritise water recycling systems as part of source control at an early stage of the development process so that runoff can be stored and used as a grey water or potable supply.
2. Domestic water consumption is designed to meet as a minimum code 4 105*litres/head/day and where possible achieve 80*/h/d (code 5 and 6).
In non domestic properties:
3. The maximum number of credits is achieved in a BRREAM assessment in the section dealing with water.

Reference needs to be made to the relevant WCSs and the need for water efficiency in one of the driest parts of the country.

The * above should be determined using evidence provided, where practicable, by the relevant Water Companies based on water demand and supply projections. If water supply and demand projections show long term concerns then a mandatory code 5 (80l/h/d/) should be put in here and if challenged, the evidence must be available.

Foul Water Policy

Development will be permitted if:

1. Drainage to a foul public sewer is provided.
The development of sites where drainage to a public foul sewer is not feasible will only be permitted if proposed alternative facilities are considered adequate and would not pose an unacceptable risk to the quality or quantity of ground or surface water, pollution of local ditches, watercourses or sites of biodiversity importance. A package treatment plant should be provided where this is not possible. Only where it is clearly demonstrated that neither of these options is feasible will a system incorporating septic tank(s) be acceptable.

2. Developers should demonstrate that there is or will be adequate capacity within sewers and the treatment facilities without causing deterioration to water quality. Reference should be made to the Water Cycle Strategy and advice from the relevant water company.

It should be recognised that water companies have a statutory duty to provide a foul water connection for new development and so confirmation of connection availability will not, on its own, be regarded as proof of capacity in the system and the environment.

Planning applications for proposals that would not be connected to mains drainage will not be validated until they are accompanied by a foul drainage assessment adequate to inform determination of issues set out in circular 3/99.

Agreed way forward

CCC Position:

Objection maintained in terms of a lack of a Water Quality and a Water Efficiency policy. If references to the current best practice guidance are included in the Core Strategy text we would be willing to withdraw our objection. However, without reference to the current best practice guidance within Policy CS14 – mainly CiRIA 687 and CiRIA 697 (or equivalent) which set out best practice in designing and planning for SuDs, we do not consider the Core Strategy sound. The inclusion of references would prevent developers building what they deem to be 'appropriate' but which may not be in line with best practice.

FDC Position:

The CCC position should also be read alongside representations from EA.

FDC does not propose any new water related policy. However, three minor modifications to Policy CS14 Part B (MPC/5/002 – MPC/5/004) are proposed. See <http://www.fenland.gov.uk/CHttpHandler.ashx?id=8724&p=0>. Of most relevance to the CCC objection is MPC/5/004 which commits the council to adopting an SPD covering a wide range of water related matters. This will be along the lines of an EA / Anglia Water endorsed SPD produced by Peterborough CC. To make reference to best practice documents in the policy could quickly become dated, especially as the FWM Act is still in the process of being implemented. An SPD can be more easily updated to reflect national policy and best practice.

As such, no additional change to the Core Strategy other than the modifications outlined.

Taking policies CS8 to CS11 in turn:

Policy CS8 Wisbech – the policy identifies the key growth areas and the transport infrastructure. Support is given to the identification of the transport capacity constraints in Wisbech and the need for modal shift to sustainable transport modes, and in particular the key highway capacity improvements required.

For the following infrastructure it is not clear (either in Policy CS8 or the Infrastructure Delivery Plan) whether they are critical/essential to enable development

- east-west road links to relieve pressure on Weasenham Lane
- link connecting the A1101 in the north to the B198 Cromwell Rd in the south (including a new river crossing)
- improvements to junctions of the A47

...

Wisbech

East Wisbech (strategic allocation): No Minerals or Waste Existing / Allocated Sites or Consultation / Safeguarding areas. The County Council as Mineral/Waste Planning Authority does not object to this allocation.

South Wisbech (broad location for growth): The broad area identified (located broadly to the north of the A47 and between the B198 in the west and A1101 in the east) for business and residential development falls partially within the Waste Consultation Area for Wisbech HRC and Algores Way allocation. Policy CS30 of the Minerals and Waste Core Strategy requires that any proposed new development that comes forward within the Waste Consultation Area should demonstrate that it will not prejudice existing or future planned waste management operations (Core Strategy CS30). This logically applies equally to Local Plan allocations, especially as the Local Plan must in itself be deliverable. In the context of a Waste Consultation Area employment development is more likely to be compatible with the existing waste management uses that are being safeguarded. The Local Plan should make it clear that any residential development will be outside the Waste Consultation Area and any other development which falls inside the Waste Consultation Area must be compatible with the existing/planned waste management use.

West Wisbech (broad location for growth): No Minerals or Waste Existing / Allocated Sites or Consultation / Safeguarding areas.

Nene Waterfront and Port (broad location for growth): The broad area identified for mixed use development is within the Transport Safeguarding Area for Wisbech Port, as acknowledge by the Fenland Core Strategy. The Transport Safeguarding Area places a presumption against any development that could prejudice the use of Wisbech Port for the transport of minerals/waste. Any proposals that come forward within the Transport Safeguarding Area should therefore demonstrate their compatibility with the Transport Zone (Core Strategy CS23).

...

Policies CS8 – 11 – the towns

There is a welcome intention to preserve important archaeological assets in these policies, although the relevant phrase should be modified for greater accuracy, from:

“The most important and best examples of archaeological features will be retained and used either for informal open space or other uses which preserve their integrity.”

to:

“The most significant archaeological assets will be retained in situ and managed either for informal open space or by other means that will preserve their integrity in the long term.”

Agreed way forward

CCC Position:

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

FDC proposes that a minor amendment be included to cover the phrase relating to archaeology.

Further, FDC agree to work with CCC to ensure the IDP is appropriately clear with respect to infrastructure needs.

March

North-east March (strategic allocation): The area allocated for open space and residential development lies partially within a Minerals Safeguarding Area (MSA) for sand and gravel designated by the Cambridgeshire and Peterborough Core Strategy (July 2011). However, once potential standoff areas (from existing development and roads) are taken into account it is unlikely that the site would be an economically viable mineral resource. The County Council as Mineral Planning Authority does not object to this allocation.

South-east March (strategic allocation): No Minerals or Waste Existing / Allocated Sites or Consultation / Safeguarding areas. The County Council as Mineral/Waste Planning Authority does not object to this allocation.

South-west March (broad location for growth): The broad area identified for residential development lies partially within a Minerals Safeguarding Area (MSA) for sand and gravel designated by the Cambridgeshire and Peterborough Core Strategy (July 2011). However, once potential standoff areas (from adjacent development and roads) are taken into account it is unlikely that the site would be an economically viable mineral resource. The County Council Mineral Planning Authority does not objection to this allocation.

West March (strategic allocation): No Minerals or Waste Existing / Allocated Sites or Consultation / Safeguarding areas. The County Council as Mineral/Waste Planning Authority does not object to this allocation.

March Trading Estate (broad location for growth): The broad area identified for business development is within an area with multiple county constraints. The boundaries of the broad location for growth are not clearly defined, in particular it is unclear how far north of March Trading Estate into an area of potentially viable sand and gravel reserves, development would extend

The broad area identified lies almost entirely within a Minerals Safeguarding Area (MSA) for sand and gravel designated by the Cambridgeshire and Peterborough Core Strategy (July 2011). Allocation in this area could therefore potentially sterilise a sand and gravel resource. Prior to this allocation being made an assessment of the mineral reserve should take place to determine if it is an economically viable resource and/or evidence produced that demonstrates that the need for the proposed development is overriding and that prior extraction cannot reasonably be undertaken (Core Strategy Policy CS26).

The proposed broad location for growth also falls partially within the Waste Consultation Area for Lion Yard Recycling Centre, March Landfill, March Trading Park Waste Allocation, and Whitemoor Rail depot. Additionally any proposed development may fall into the Waste Consultation Area for March AD Plant (Westry). Policy CS30 of the Minerals and Waste Core Strategy requires that any proposed new development that comes forward within the Waste Consultation Area should demonstrate that it will not prejudice existing or future planned waste management operations (Core Strategy CS30). This logically applies equally to Local Plan allocations, especially as the Local Plan must in itself be deliverable. In the context of a Waste Consultation Area employment development is more likely to be compatible with the existing waste management uses that are being safeguarded. The Local Plan should make it clear that employment development which falls inside the Waste Consultation Area must be compatible with the existing/planned waste management use.

...

Policy CS9 March – the policy identifies the key growth areas and the transport infrastructure. Apart from the reference to the delivery of the Northern Relief Road as part of the North East March extension, the transport infrastructure identified is generic infrastructure that would be

expected as part of any proposed development.

It is not clear (either in Policy CS9 or the Infrastructure Delivery Plan) what specific transport related infrastructure or measures are required to facilitate the development of the strategic allocations and broad locations for growth within March.

We would be pleased to work with Fenland District Council to carry out a study based on the outputs of the March Area Transport Study that identifies the most appropriate transport measures to help facilitate the delivery of these developments. Such a mitigation study is included in the emerging March MTTS and has received a good level of support through the recent public consultation for the draft strategy.

This study would consider the benefits and costs of the Eastern Access Road and Northern Link Road in the context of facilitating new development, as well as identifying and assessing other infrastructure improvements.

Agreed way forward

CCC Position:

Objection withdrawn – matters for the IDP

FDC Position:

No change to the Core Strategy – matters for the IDP

Minerals and Waste Planning

With reference to the proposed Strategic Allocations there are no objections arising. However a number of the identified broad locations for growth are in designated safeguarding and consultation areas. Prior to any development coming forward in these broad locations the Minerals and Waste Planning Authority would need to be satisfied that development will not prejudice existing or future planned operations at waste management facilities and that development would not sterilise economically viable mineral resources.

This team supports the inclusion, in Policy CS7 - Urban Extensions, of the requirement that all aspects of the Minerals and Waste Development Plan be considered and any issues arising be appropriately addressed

It is noted that a number of WWTW require upgrading or expansion. Policies in the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (July 2011) provide the planning policy context for the provision for such infrastructure where it cannot be provided under permitted development rights.

...

Policy C7 urban extensions

Additional suggestion to the list of criteria:

- Make provision for walking and cycling networks to promote physical activity and mental health both within the urban extension and to connect with existing communities and green spaces.

...

Policy CS7 Urban Extensions details the requirement for a comprehensive delivery scheme approach for all urban extensions; this will include Rights of Way (ROW), details of community transport and delivery of Market Town Transport Strategy schemes. It is disappointing that cycling and conventional public transport are not covered in this policy, as they play an important role in a development overall transport strategy.

All new developments should be designed to integrate with the existing sustainable travel network and provide new sustainable infrastructure to reduce the need to travel and help promote travel behaviour change away from the private car.

In addition, as part of all new developments, the County Council wishes to see all new roads adopted. This should ensure that roads are built to the appropriate standard and are adequately lit and drained which should benefit all future users.

Policy CS7 also identifies the linkages between new communities and job opportunities. The location of employment areas can significantly impact the operation of the local highway network within the vicinity of the site and therefore it is vital that suitable transport options exist, or can readily be developed, to ensure access to the site is available by all modes.

...

Policy CS7 – Urban Extensions

P.36 (v) 'Market Town Transport Study' should read 'Market Town Transport Strategy'

...

Libraries, Archives and Information

1. Policy CS7 Urban Extensions

We would like to see the following words added to this section
“ a contribution to enhanced library facilities on or off site in order to meet the needs generated by the urban expansion”

Agreed way forward

CCC Position:

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

Rephrase to Market Town Transport Strategy. Otherwise, no change to the Core Strategy.

Chatteris

East Chatteris (strategic allocation): No Minerals or Waste Existing / Allocated Sites or Consultation / Safeguarding areas. The County Council as Mineral/Waste Planning Authority does not object to this allocation.

South Chatteris (strategic allocation): The area allocated for residential development lies partially within a Minerals Safeguarding Area (MSA) for sand and gravel designated by the Cambridgeshire and Peterborough Core Strategy (July 2011). A site investigation, undertaken in support of a planning application F/YR10/0804/O, has found that the sand and gravel in the allocated area is not a viable economic resource. The County Council as Mineral Planning Authority does not object to this allocation.

North Chatteris (broad location for growth): No Minerals or Waste Existing / Allocated Sites or Consultation / Safeguarding areas. The County Council as Mineral/Waste Planning Authority does not object to this allocation.

...

Policy CS10 Chatteris – the policy identifies the key growth areas. Aside the cycle linkage to the Mepal Outdoor Centre, the transport infrastructure identified is generic infrastructure that would be expected as part of any proposed development. It is not clear (either in Policy CS10 or the Infrastructure Delivery Plan) what specific transport related infrastructure or measures are required to facilitate the development of the strategic allocations and broad location for growth within Chatteris. E.g. it is not clear what status the southern link between London Road and the A142 has.

...

Policy CS10 - Chatteris

South Chatteris (strategic allocation):

The second last sentence regarding the setting and character of Title Farm barn is useful for the preservation of this historic barn, but requires enhancement in order to enable public benefit to arise from the redevelopment of the farm. Amend to read:

“The setting and character and archaeology of Tithe Farm Barn should be safeguarded and interpreted for public benefit as part of any redevelopment scheme.”

North Chatteris (broad location for growth):

The policy should be mindful of the medieval ridge and furrow earthworks that are preserved within the Furrowfields open space, and amend the third last sentence of this policy to read:

“Opportunities should be taken to add to the Furrowfields Road Open Space area while seeking to continue the long-term preservation of medieval cultivation earthworks in this location.”

Agreed way forward

CCC Position:

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

Amendments as suggested regarding Tithe Barn and Furrowfields will be made as minor modifications, and added to the schedule accordingly. No other changes proposed.

Whittlesey – CS11

North and south of Eastrea Road (strategic allocation): The area allocated for residential development lies partially within a Minerals Safeguarding Area (MSA) for sand and gravel designated by the Cambridgeshire and Peterborough Core Strategy (July 2011). However, once potential standoff areas (from adjacent development and roads) are taken into account it is unlikely that the site would be an economically viable mineral resource.

The south-western tip of the allocated area is within the Waste Consultation Area for Whittlesey Household Recycling Centre. Policy CS30 of the Minerals and Waste Core Strategy requires that any proposed new development that comes forward within the Waste Consultation Area should demonstrate that it will not prejudice existing or future planned waste management operations (Core Strategy CS30).

The County Council as Mineral/Waste Planning Authority does not object to this application.

Regional Freight Interchange: The area allocated for the Regional Rail Freight Interchange lies entirely within an area of permitted brick clay reserves (Must Farm). The proposed interchange would sterilise a significant proportion of the permitted reserves however to ensure adequate reserves are identified to maintain a steady supply of brick clay for the brick works, should the freight interchange come forward, the Mineral Planning Authority has allocated additional reserves on land south of Must Farm. The County Council as Mineral Planning Authority does not object to this allocation.

...

Policy CS11 Whittlesey – the policy identifies the key growth areas and the transport infrastructure identified is generic infrastructure that would be expected as part of any proposed development. The policy also makes reference to the potential Regional Freight Interchange which is welcomed. The key transport issues have been identified including the impact on the A605 and the level crossings at Whittlesey Station and Kings Dyke. It is not clear what specific transport related infrastructure or measures are required to facilitate the development of the North and South of Eastrea Road strategic allocation or Regional Freight Interchange strategic allocation.

In referring to King's Dyke Crossing, funding should also include Cambridgeshire County Council and Network Rail and indicate that there is the potential for funding through the Local Transport Body for Cambridgeshire, Peterborough & Rutland.

...

Whittlesey

4.6.2 – Here, Hanson Brick is mentioned and this would be a useful place to insert a sentence on the national importance of well-preserved prehistoric archaeological remains investigated in the large landscape excavations ahead of clay extraction and in investigations conducted between the scheduled archaeological earthworks at Horsey Toll and Stanground:

4.6.2 “Nevertheless, Whittlesey is not purely a dormitory town and supports important local employers including Hanson Brick and McCain Foods.

4.6.3 Hanson’s extensive clay extraction pits on the west side of Whittlesey have revealed nationally important well-preserved prehistoric remains, including the unique discovery of nine Bronze Age boats in a former river channel associated with preserved wooden settlement remains. Similar significant archaeological assets have also been established between the scheduled archaeological earthworks at Horsey Toll and Stanground.

The paragraphs following this important information would need to be renumbered.

Policy CS11 - Whittlesey

Rail Freight Interchange

Amendment of the second sentence in second paragraph is recommended to indicate the District Council's awareness of nationally important archaeological remains in this area too:

"The Council is also aware of issues in respect of flood risk, nationally important archaeological remains and nature conservation in this area."

Bullet point 10 needs amendment as follows:

- Assessment of impact on known and potential undesignated archaeological remains and designated heritage assets both within the site and in the wider area, and include strategies to preserve the interest of the remains through investigation programmes or appropriately managed in situ schemes.

Agreed way forward

CCC Position:

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

No change to the Core Strategy

Policy CS16 Delivering and Protecting High Quality Inclusive Environments across the District

Left hand box: How will the policy be implemented? First bullet should include reference to the Cambs Historic Environment Record as shown below. This important local resource provides the total record of the existing, up-to date knowledge on designated and undesignated elements of the historic environment. The use of HERs is referred to in NPPF and use of the local HER should be included here.

“Through the on-going submission and determination of planning applications involving Natural England, English Heritage and using data from the Biological Records Centre, Local Biodiversity Action Plans and from the Cambridgeshire Historic Environment Record.”

...

Agreed way forward

CCC Position:

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

A minor amendment is proposed to cover the suggestion.

Economic Development

We fully support the aspiration in the vision to increase employment opportunities across the district, by both encouraging the development of emerging sectors and seeking to broaden the economy. The Fenland Economic Development Strategy forms the framework for the employment policies in the Local Plan Core Strategy and this was supported in its draft version prior to adoption, so given our endorsement of this there is little to comment critically on in the employment sections of the document.

We consider the scale of job growth at 7200 to 2031 to be ambitious but it still considerably below the housing target and below the EEFM baseline forecast (although a little above the perhaps more realistic EEFM lost decade forecast). This has translated into an employment land requirement of 85ha, with this being wholly focused on the 4 market towns. This scale of allocation is not unreasonable given the need to have a range of quality serviceable sites for inward investors and the likelihood that some existing allocations may not come forward for development in the current/foreseeable economic climate which may make some sites in Fenland uneconomic to bring forward.

The selection criteria for employment, tourism, community facility and retail proposals are supported.

The lack of site specific employment site detail is of concern, and does not compare with the best practice applied elsewhere with Local Plans across Cambridgeshire. Businesses are looking for certainty and clarity as well as well sited and often service employment land. The accompanying economic development strategy does help in this respect to some extent, providing a context for the employment proposals, but for other aspects of the Core Strategy there is considerably less detail which is very concerning for this stage of the plan preparation.

...

Policy CS3 identifies that development should create strong, sustainable, cohesive and inclusive communities making the most of previously developed land and enabling a larger number of people to access jobs, services and facilities. From a transport point of view, the settlement hierarchy is supported with the majority of development focused on the market towns and larger villages.

The location of future growth and employment is critically important to ensure the opportunity to travel using sustainable modes is maximised and need to travel is reduced where possible. The market towns are existing settlements with an established level of existing transport infrastructure, and a land-use mix that can in part contribute to more sustainable travel patterns. Local transport infrastructure within villages (particularly for sustainable modes) may not have the capacity to cope with the additional demand, and the level of complementary facilities can be low (thereby reducing the scope for self-containment and local journey-making).

...

Policy CS6 - Employment, Tourism, Community Facilities and Retail

Recommend insertion of "tourist destination" in left hand box in following sentence:

"Active promotion of Fenland as a business location and tourist destination".

This would require a matching bullet point in the right hand column, located above the bullet point regarding the loss of viable tourism facilities to read:

“Increased use of Fenland’s rich natural and historic environments to promote wider tourism opportunities.”

This would ideally lead to the development of a dedicated tourism strategy.

Agreed way forward

CCC Position:

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

No change to the Core Strategy

Policy CS 15 Facilitating the creation of a more sustainable transport network in Cambridgeshire
We welcome the inclusion of infrastructure for walking and cycling as part of this sustainable transport strategy.

(C) Designing Development schemes (page 70/71)

To encourage the use of bicycles, we would suggest *that standards for cycle parking are established*. The cycle parking should be safe and accessible and planned into all new homes/properties as well as serving places of employment, shops, services and facilities. We note that Appendix A only covers standards for car parking.

...

Transport

This document identifies a vision and strategic objectives for the district, which are supported. In particular, from a transport planning perspective, we welcome the focus of growth taking place in the market towns where existing transport infrastructure is in place. We also welcome the priority placed on the development of healthy inclusive and accessible communities which will improve the quality, range and access to services and facilities. It is important that new transport infrastructure and public transport services are provided to ensure that the district functions effectively and to tackle the transport and accessibility issues identified. In addition, from a transport perspective we welcome the wider policies that seek to improve the local economy to reduce out-commuting and also provide greater opportunities to reduce car use by locating development where there is good access to jobs, services and supporting improvements to public transport, walking and cycling networks. Walking and cycling are important mode choices for shorter journeys and can help reduce the impact of a development on the highway network.

However we do have a number of concerns over the lack of clarity of key transport infrastructure dependencies within the Core Strategy & Infrastructure Delivery Plan and the funding required to deliver these.

In keeping with the comments of our Capital & Funding Manager, it is considered that a more robust process of categorising and prioritising transport infrastructure is required, and that criteria such as those adopted by Huntingdonshire District Council in their business plan would represent a step forward. They prioritise infrastructure according to the following criteria:

- Critical Infrastructure
- Essential Infrastructure
- Policy High Priority Infrastructure
- Desirable Infrastructure

We would be pleased to work with Fenland District Council to help identify and group the transport infrastructure measures required to facilitate development in each of the market towns and across the district as a whole.

...

Policies CS8-CS11 identify the policies for the four market towns in Fenland. Transport is covered in all of the policies, but it does not have continuity across the four policies. In some of the policies specific infrastructure constraints are mentioned, whilst in another there is reference to a transport assessment. In addition some policies mention general walking and cycling links whilst in other strategic infrastructure is identified. Every strategic allocation and broad direction for growth in policies CS8-11 will require a Transport Assessment (TA). Therefore for consistency this requirement should therefore be specified for all development sites in policies

CS8-11.

...

The document sets out a policy for transport impact in COM7 which states that developments should be designed to reduce the need to travel, particularly by car and should promote sustainable forms of transport appropriate to its particular location.

Policy CS15 – Sustainable Travel Network identifies the need for an integrated approach to transport in Fenland which is supported. The policy also identifies that the right infrastructure is needed in the right place and at the right time if the transport vision is achieved and that all development proposals should contribute to the delivery of the transport objectives set out. This statement, along with the transport objectives is supported.

The policy also references the requirement for transport statement/transport assessment for all proposed developments, which although not detailed, is welcomed. The scope for these documents will also need to be agreed with Cambridgeshire County Council as the local highway authority in addition to the District Council. Should the site potentially have an impact on the Trunk Road network then engagement with the Highways Agency will be essential. Although there is also only a mention of the requirement for a Travel Plan for developments which have a significant transport impact, this mention is welcomed. The County Council would expect all categories of development, including both commercial and residential, to provide a travel plan. It is accepted that thresholds may need to be set above which residential travel plans are required. The County Council would be pleased to be involved in further discussions on this policy area (and any subsequent reviews of policy in this area).

Also under Policy CS15, the second paragraph should be reworded so that it includes reference to the MTTSS as the key strategy documents for delivery of transport measures in Fenland:

'Detailed strategy, targets and delivery arrangements to help achieve the vision are set out in the Local Transport Plan [or its successor document], the Market Town Transport Strategies and the Transport and Access Group Work Programme.'

For the bullet point relating to the reopening of the March to Wisbech railway line, we suggest adding 'for use as a high quality public transport system' to the end of the sentence to give flexibility regarding the type of system that could be delivered along the rail corridor in the event that a heavy rail based solution is found to be unfeasible.

Parking Provision for the district is set out in Appendix A; support is given for the inclusion of policies to clarify these matters. The policy identifies that in market towns there maybe the opportunity for the sharing of parking provision or for less parking provision to be delivered where there is good public transport links which is supported. Different characteristics across the district may require different car parking standards with possible higher provision in the rural areas where there may be more reliance on the private car. If adequate parking provision is not required, there may be a high number of vehicles parking on the highway.

Turning to 'Rail based infrastructure' the status of these projects should be reviewed as some of these appear critical for the delivery of sustainable development in Fenland, particularly improvements relating to Whittlesey and March railway stations.

March railway station bus interchange is mentioned in 4.21 of the Infrastructure Delivery Plan as a key item of infrastructure but has not been included in the summary tables alongside other railway schemes. Likewise schemes to improve and extend March railway station have been omitted from the summary tables. All of these schemes have received a good level of support through the recent public consultation for the draft March MTTSS.

In terms of Cycling & Walking, Local Road Network Improvements and Transport – Parking,

further detail relating to these schemes is required in the summary tables for each market town, for example giving the number and cost of schemes in each MTTs. An indication regarding the status of such schemes in helping to facilitate the delivery of development in the Core Strategy is also required.

Key town centre schemes such as improvements to Broad St in March and Market Square in Whittlesey should also be included.

Finally from a transport perspective we have a number of specific detailed comments. These are:

...

5.3.6 MTTs have been completed for each of the Fenland towns, with the strategies for March and Wisbech currently in the process of being revised and updated (as at March 2013).

Agreed way forward

CCC Position:

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

No change to the Core Strategy

The strategic approach set out in the plan does not plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure, as required under section 114 of the NPPF. It also fails to contribute to and enhance the natural and local environment by recognising the wider benefits of ecosystem services; and does not enable provision of net gains in biodiversity. Consequently, the document fails to contribute to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures, as required under section 109 of the NPPF.

Policy CS12 – Rural Areas Development Policy

- (g) this sentence needs to require compliance with NPPF policies on these issues, and, in local terms, enable the conservation of heritage assets where appropriate.

Agreed way forward

CCC Position:

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

No change to the Core Strategy

Chapter 7 Monitoring

Section 7.32 notes that the key indicators from the SA will be used for monitoring the Plan. Indicators for monitoring the Health and Wellbeing Strategy 2012-2017 are being developed and will be based on the new Public Health Outcomes Framework. In the light of this, it may be helpful to review the Sustainability Appraisal indicators to ensure that there is alignment between the plans.

7.3.4

As a result of the NHS Reforms, there are new health bodies who will be stakeholders in the planning process. These now include Cambridgeshire and Peterborough Clinical Commissioning Group (CCG); NHS Property Services and ~~the National Commissioning Board~~. **NHS England, East Anglia Area Team (NHS England EA AT)**. There are also a number of Local Clinical Commissioning Groups that make up the CCG including 4 LCGs that cover the population registered with Fenland GPs. These LCGs are Hunts Care Partnership; Borderline; Wisbech and Isle of Ely. From April 1, Public Health will be transferred to Cambridgeshire County Council.

...

Section 7 Previous ‘Saved Policies’, Implementation and Monitoring

The right hand boxes of Policies C8 – C11 on measuring success (effectiveness and implementation) should surely refer to the vision for these town areas and other strategic policies. Effectiveness of the policies will be measured by the creation of x number of new schools, improved sewage facilities & other infrastructure provision, new development having attained target levels of employment, environmental protection (all forms), enhancement/conservation of townscapes and public benefit resulting from attractive open spaces and the level of the District’s sustainable energy contribution to the national grid. Or refer to Policy CS16, for example, among others.

...

Section 7 Previous ‘Saved Policies’ Implementation and Monitoring

CS18 – Historic Environment (p 91)

Welcome reference to use of the Cambridgeshire Historic Environment Record (HER) in this policy box.

Second sentence in left hand box: insert “of” in phrase “Application **of** national guidance and the use of up-to-date...”

In the right hand box (monitoring/measuring effectiveness) we recommend the inclusion of a fourth bullet point as follows:

- Increased public benefit from community engagement with relevant historic environment programmes and initiatives, stimulating an increased sense of place. Target: all major projects and those which have affected highly significant heritage assets.

Risks

This box presents three risks:

The second risk is - “Lack of funding available”. This is not acceptable as a risk in connection with the archaeological considerations within the historic environment, since no development should be put forward by applicants that have not been sufficiently resourced from the outset.

The third risk is – “A risk of low quality historic environment assessments”. We would remind the district council that procedures are in place in Cambridgeshire to ensure the use of professional archaeological organisations registered with and scrutinised by the professional body, the Institute for Archaeologists, further ensuring that archaeological work and outputs are undertaken to high standards.

The “Trigger points” section should include:

“Reported loss of unrecorded archaeological assets; increased enforcement requests”.

And in “What action will be taken”, “the increased use of enforcement action leading to successful completion of required schemes of work ” should be stated.

...

4. 7.3 Implementation and Monitoring Framework

7.3.4 Libraries should be added to the list of services provided by the County Council

Agreed way forward

CCC Position:

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

Some minor amendments to the Core Strategy to reflect the issues raised.

Lifetime Homes – Policy CS5

CS 7 and CS 5 (Part C) should acknowledge the needs of an existing ageing population by reference to specific standards and targets for Lifetime Homes and the need to secure schemes which ensure the full integration of this cohort of the population with specific needs to maintain community cohesion, reduce isolation, and improve economic activity rates.

With an increase in the elderly population it is essential that all measures are taken to ensure that the new homes built are built to a standard which enables people to live independently for as long as they wish too. In order to achieve this objective it is important to ensure Lifetime Home standards are set out clearly in the Councils planning policies, thereby enabling the local planning authority to apply the relevant policies to future development proposals that come forward. Fenland District has a higher than average elderly population and an existing housing stock with very few homes built to the Lifetime Homes standard, which makes it imperative that the new homes built are built to the appropriate standard to redress what is a growing problem.

It is very helpful to see that the District Council has made changes to improve upon the earlier version of their Plan, whereby the District Council through policy CS5 Part C refers to: "The Council also expects developers, through the design of developments, to contribute to Fenland District Council's and Cambridgeshire County Council's aim of enabling people to live in their own homes for as long as possible. In this regard, where appropriate and viable, the Council will seek all new housing to be of a Lifetime Homes Standard."

Ideally policy CS5 should be strengthened to ensure all new homes are built to a Lifetime Home standard, thereby helping to address the demographic changes taking place within Fenland District, thereby ensure effective and efficient use of resources are invested at the outset of building new homes rather retrospectively seeking to adapt homes at huge and unnecessary public expenditure. If the District Councils policy is clear that Lifetime Homes are expected it would be wrong to assume the economic of providing such homes makes development unviable. The cost saving of delivering the right quality of homes at the outset, far outweighs the costs required to make adaptation or make changes once a house has been built.

Residential Care Accommodation – Policy Omission Objection

Considerable care is needed to integrate accommodation for the elderly within the market towns and those larger villages with a good range of facilities and services to enable wherever possible the residents of these homes to use local facilities, and allow visiting friend and families to be able to walk elderly family member and/or friends into the town centres or local park. To locate residential care or sheltered housing in isolated locations is not acceptable or conducive to sustainable patterns of living.

This existing Local Plan has a policy omission around the policy requirements to ensure that nursing homes, residential care, rest homes and sheltered housing is contained within a planning policy.

Any new policy will need to ensure the following criteria have been addressed including:

- The development provides adequate accommodation for on-site warden/staff;
- The development incorporates usable, attractive areas of communal garden;
- The internal and external layout and design meets the needs of people with mobility problems.

CCC Position:

Objection maintained. Specifically:

CCC maintain their objection to a lack of policy on Residential Care Accommodation – plan unsound without it.

CCC maintain their objection to a lack of policy requiring 100% Lifetime Homes – plan unsound without it

FDC Position:

FDC does not consider that a new policy on Residential Care Accommodation is necessary and do not support the inclusion of a new policy. A future SPD covering this issue, and wider health/elderly issues, may be undertaken in due course but not prior to adoption of the Core Strategy.

FDC does not support a policy requiring 100% Lifetime Homes – a situation recently backed by commentary in government's current consultation on Housing Standards.

Ecology

Section 2.4.2

We welcome the inclusion of biodiversity as part of FDC's objectives for the Local Plan. However these objectives merely repeat statutory wildlife legislation and do not meet the government's requirements set out in the NPPF nor guidance set out in the accompanying circular 06/2005. They also fail to reflect the government's vision for the natural environment set out in the Natural Environment White Paper and England Biodiversity Strategy; and the adopted Cambridgeshire and Peterborough Green Infrastructure Strategy.

Historic Environment

In section 2.4.2 Our Objectives – 3.1 Landscape and Cultural Heritage (p 11): this section commences with the word and concept to “Preserve”. However, new terminology in the NPPF replaces “preserve” with “conserve” adding that this should be appropriate to the significance of heritage assets. FDC may wish to review their position on this, especially since it may affect their implementation and monitoring ideals in section 7 (e.g. p.91) of the CS.

Agreed way forward

CCC Position

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

No change to the Core Strategy

6.4 Historic Environment and Heritage Assets

6.4.1 Description of 'Heritage Assets' should be as shown in the glossary of NPPF so as to prevent any future conflict with interpretation and to be compliant with national policy.

The second last sentence of the paragraph needs amending to include how information on undesignated assets can also be found:

"Advice on designated assets and undesignated historic environment evidence should be sought from the Cambridgeshire Historic Environment Record based in Cambridgeshire County Council."

Policy CS18 – The Historic Environment

This policy is compliant with the principles of NPPF and augmented by stipulating that these will be upheld when considering applications for new development.

Agreed way forward

CCC Position

Objection withdrawn. Comments regarded as advisory and not an objection to the soundness of the plan. However, amendments to the plan would be supported as appropriate.

FDC Position:

Minor amendments are proposed to cover the suggestions made.