

## Statement of Public Participation Report

February 2015

### Developer Contributions Supplementary Planning Document (SPD): Representations received during public consultation (5<sup>th</sup> December 2014 – 15<sup>th</sup> January 2015) and changes made to SPD following consultation

#### **Explanatory Note:**

*This report sets out a summary of the representations received during the consultation on the Draft 'Developer Contributions' SPD together with the Council's response to these comments. This is a public document, and helps Fenland District Council meet its commitment to consult and keep people informed of progress on planning policy documents that form part of the Fenland Planning Policy Framework.*

*This report also sets out changes made to the SPD which were necessary as a result of comments received through the consultation process.*

## **1. Introduction**

- 1.1. Fenland District Council wishes to thank all those who took the time between 5<sup>th</sup> December 2014 and 5<sup>th</sup> January 2015 to comment on the draft 'Developer Contributions' SPD.
- 1.2. The SPD has been prepared to support the Local Plan, specifically Policy LP13 – 'Supporting and Managing the Impact of a Growing District' part(b), - 'Developer Contributions'. The SPD will provide clarity to developers, planning officers, stakeholders and local residents regarding the basis on when developer contributions will be sought and the type of developer contributions that may be required.
- 1.3. Policy LP13 'Supporting and Managing the Impact of a Growing District', part(b), - 'Developer Contributions' of the adopted Fenland Local Plan 2014 is used as the starting point for this SPD. When adopted, the SPD will form part of the Council's planning policy framework, supplementing Policy LP13 of the Local Plan. The adopted SPD will have status as a material consideration in the determining planning applications. The Local Plan policies will have the greatest 'weight' in legal terms when the Council determines planning applications. However, the Local Plan only sets the overarching policy approach to planning in Fenland; this SPD provides detailed guidance on how this policy will be implemented.

## **2. Compliance with National Guidance and Regulations**

- 2.1. The SPD was prepared in accordance with national guidance, most notably the National Planning Policy Framework (NPPF) and The Town and Country Planning Regulations 2012. Regulation 12(b) and Regulation 13 require the Council to consult the public and stakeholders before adopting a SPD. The Council is required by Regulation 12(a) to prepare a statement featuring details of those who

the Council consulted; a summary of the main issues that were raised during the consultation; and details of how these issues were addressed by the Council as well as any consequential changes to the SPD.

- 2.2. The public and stakeholders were invited to comment on the SPD during the consultation period. This included all parish councils in and around Fenland, neighbouring district and county councils, local businesses, interest/pressure groups, religious organisations, infrastructure providers and any other body, party or individual that specifically requested to be consulted on the Local Plan. Annex A contains a list of those we consulted.

### **3. Changes to the SPD**

- 3.1. A table below summarises all the comments received and how Fenland District Council responded to the issues raised by these comments. The table also shows any changes made to the SPD as a result comments received. Where there are changes or no changes were made, this is clearly explained in the Council's Response column. Any changes to SPD are recorded in 'Change to SPD' column.

## **Consideration of the issues raised by consultees**

Respondent information	Comments	Council's Response	Change to SPD
COM-1 Highway Agency	<p>Thank you for your consultation on the above document. Fenland District Council have given sound advice to potential developers in that they are advised to discuss their intentions early in the planning process in order to establish what mitigation may be necessary for the surrounding highway infrastructure whether Highways Agency or County Council.</p> <p>The remainder of the draft document relates to matters which specifically concern Fenland District Council policies and established practice. I feel therefore, that it is inappropriate for the Highway Agency to comment on those matters or the manner in which they are acquired via development in the area.</p>	Comments noted	No change
COM-2 Marine Management Organisation	Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation.	Comments noted	No change
COM-3 L Bevens Associates Ltd Architects	<p>I wondered how the impact of the SPG will be affected by the recent news from Government on the consultation exercise carried out in March of this year, in which schemes of 10 units or less will not be liable to affordable housing, nor contributions? I appreciate that this has yet to become adopted national policy but no doubt it will do.</p> <p><b>Extract from national press</b> 'The Department for Communities and Local Government (DCLG) consulted on a proposed new 10-unit threshold for section 106 affordable housing contributions to reduce planning costs to developers. In its response to the consultation, published last week, the DCLG said that the proposal had received support from developers, development representative bodies and some members of the public, who argued that "excessive affordable housing contributions were</p>	An SPD is not permitted to amend policy in a Local Plan. As such, the adopted Local Plan policy on affordable housing thresholds continues.	No change

	<p>often being applied".</p> <p>But the DCLG added that local authority responses "generally opposed both the principle of a national threshold for affordable housing contributions and the size of the proposed threshold".</p> <p>The consultation response said that, after "careful consideration" of the responses, the government will make changes to national policy to prevent local planning authorities from seeking affordable housing contributions from "sites of 10-units or less, and which have a maximum combined gross floorspace of 1,000 square metres</p>		
COM-4 Norfolk County Council	<p>The officer-level comments below are made on a without prejudice basis and the Norfolk County Council reserves the right to make further comments on the emerging SPD.</p> <p>(a) Welcome the opportunity to comment on the SPD;</p> <p>(b) Section 4 – Consider that there ought to be reference in this section to cross-boundary working where a new development covers two or more local planning authority areas or where the development is likely to have a demonstrable impact on services/infrastructure in a neighbouring area. This is particularly relevant in respect of proposed new housing development in and around Wisbech;</p>	<p>Comments noted. As there are locations on Fenland boundary where development would require and benefit from cross-boundary working, this should be mentioned in the SPD.</p>	<p><b>Change</b> - Insert new section entitled "Cross-boundary Working".</p>
COM-5 Norfolk County Council	<p>(c) Paragraph 4.4 – the text to this paragraph needs amending to reflect the Government's recent amendment to policy on thresholds of housing development where affordable housing can be sought i.e. development of 10 or less dwellings are now exempt from having to provide affordable housing (5 or less in qualifying designated areas).</p>	<p>An SPD is not permitted to amend policy in a Local Plan. As such, the adopted Local Plan policy on affordable housing thresholds continues.</p>	<p>No change</p>
COM-6 Steve Count	<p>2.2 However, this SPD takes its lead from Policy LP13 (see below) of the Local Plan. As a basic principle developers will be expected to meet and pay for the infrastructure need that a proposed development will generate, <b>not met by existing infrastructures</b>. In part (b) of the policy, the need for developer contributions is referred <b>to</b> as well as the need to provide further guidance on where it will be sought, how it will be collected, and how the money collected will be spent. This</p>	<p>. The suggested changes are reasonable and add clarity to the paragraph.</p>	<p><b>Change</b> - Add 'not met by existing infrastructures' after generate at the end second sentence in paragraph 2.2. Add 'to' between referred and as</p>

	<p>SPD addresses these issues.</p> <p>Key: Text in <b>blue</b> is suggested as additional text or comments and <del>strikethrough</del> text suggested for deletion</p>		in the third sentence.
COM-7 Steve Count	<p>3.1 There are four different mechanisms which can be used to ensure that new developments address <b>unacceptable</b> <del>any</del> adverse impacts <b>which render a proposal unsustainable</b> as well as contributing to the local economy and improving the environment, where possible. These are:</p> <ul style="list-style-type: none"> <li>• Planning conditions;</li> <li>• Planning obligations;</li> <li>• Unilateral undertakings; or the</li> <li>• Community Infrastructure Levy (CIL)</li> <li>• S278 Agreements</li> </ul> <p><b>If you leave “any adverse impacts” intact presentations will be made to committees quoting this over even the smallest of impacts. Additionally in the above, “four” mechanisms are mentioned, but five bullet points are listed; removing the line break after “or the” does not appear to resolve this i.e.</b></p> <ul style="list-style-type: none"> <li>• Planning conditions;</li> <li>• Planning obligations;</li> <li>• Unilateral undertakings; or the</li> <li>• Community Infrastructure Levy (CIL)</li> <li>• S278 Agreements</li> </ul> <p><b>As I am unsure the four that remain are what was intended</b></p>	<p>The term ‘unacceptable adverse impact’ would be more suitable to use than ‘any adverse impact’ in this instant. A sustainable proposal can have unacceptable adverse impact. For example a viewing platform which could be considered as a sustainable development could have an adverse impact in sensitive locations such as SSSI or Ramsar site than in less sensitive locations.</p>	<p><b>Change</b> – delete the word ‘any’ and replace this with ‘unacceptable’ in the first sentence in paragraph 3.1 between address and adverse.</p> <p><b>Change</b> – delete S278 Agreement from the list in paragraph 3.1 (fifth bullet point) as this is an agreement to carry out work for the local authority by a developer to the standards and satisfaction of the Local Highway Authority. It is not a mechanism for securing developer contributions.</p>
COM-8 Steve Count	<p>3.4 Where a need for a developer contribution has been identified on the development site, or on land owned or managed by the developer or landowner, a planning condition may be the most appropriate mechanism to ensure delivery. This type of condition (known as a Grampian condition) will normally prohibit occupation of the development, <b>or a specified part of the development</b>, until the</p>	<p>Guidance is sufficient in para 3.4. No need for additional clarity.</p>	No Change

	developer contribution has been provided.		
COM-9 Steve Count	<p>3.13 Where it is required, a completed planning obligation must be agreed and in place before planning permission is able to be granted. To facilitate the process, and ensure a timely decision can be made on a planning application, the Council expects that a Heads of Terms for a S106 is provided at the validation stage of a planning application. Planning approval subject to a S106 Agreement may be granted by the Planning Committee but this will depend on the S106 being substantially completed (and <del>where necessary</del> Committee being made aware of its substantive contents) and being capable of being signed by all parties very soon after the decision is made.</p> <p>The removal of where necessary appears to a substantive change as in my experience it is rare a committee is aware of any S106 details. The reason given is “you cannot buy planning permission”. However as S106 can be used to make an otherwise unacceptable planning application acceptable, the committee should be able see all heads of terms, which removes the possibility of human interpretation of “where necessary” which can lead to accusations of bias in presentation of information</p>	Removal of ‘where necessary’ removes any ability to be flexible and reasonable, potentially slowing down sensible decision making.	No Change
COM-10 Steve Count	<p>3.15 NPPF and the CIL Regulations make it unlawful for a planning obligation to be taken into account in determining a planning application, if it does not meet the three tests set out in Regulation 122 (as referred above). Planning obligations will need to be considered and negotiated on a site by site basis in order to ensure that the three tests are complied with. The guidance in this SPD will help to ensure that the Council takes a consistent approach in applying the three tests.</p>	Comments noted.	<b>Change</b> – add “NPPF and “at beginning of first sentence in para 3.15 and delete “The”.
COM-11 Steve Count	<p>3.16 If it is to avoid potential challenge, the Council must be sure that without the obligation, permission would be refused. In other words, the Council will need to be clear that planning obligations are meet all of the three tests of Regulation 122.</p>	Grammatical error	<b>Change</b> - delete ‘are’ between obligations and meet in the last sentence in paragraph 3.16
COM-12 Steve Count	<p>3.17 A developer may wish to enter into a Unilateral Undertaking as opposed to a S106 Agreement. Such an undertaking is offered by the</p>	Wording not necessary.	No change

	<p>applicant unilaterally in support of an application (or appeal), as opposed to agreeing an obligation following negotiation with the Council. The presumption will be that applicants will undertake provision of facilities themselves either on-site or off-site. <i>Where such an arrangement is entered into, the Council must be satisfied sufficient safeguards are in place to ensure completion of the undertaking in a timely manner, and to the standards agreed.</i></p>		
<p>COM-13 Steve Count</p>	<p><i>3.23 Whether a S278 agreement is entered into or not the highways authority must be satisfied it has sufficient security from the developer to complete any works should the developer fail to complete or deliver the specified works to an acceptable standard (to be specified) or within an acceptable timeframe (to be specified)</i></p> <p><i>This is an additional bullet point specifically aiming at dealing with developers who go bust leaving an unfinished road etc. Perhaps there is a better way of wording this but that is what I am after</i></p>	<p>New paragraph 3.23 is suggested to cover the scenario if the developer was to bust. As stated in paragraph 3.22 this should be included in the S278 agreement.</p>	<p>No change</p>
<p>COM-14 Steve Count</p>	<p>.3 Generally though, residential developments with a net increase of 510 or more dwellings or a site area of over 0.54ha, will be required to make a developer contribution for certain types of infrastructure or service, where there is an identified need. It should be noted that these thresholds are a guide, and should not be read as an absolute cut off point - a decision will be made on a case-by-case basis as to whether a planning obligation would be appropriate and necessary. Nevertheless, it would be unusual for a planning obligation to be necessary for a scheme of 4 or less dwellings (particularly as the affordable housing requirement set out in Local Plan Policy LP5 – Meeting Housing Need – does not apply to such schemes). However, it cannot be ruled out (e.g. for small scale, necessary off-site infrastructure provision) and having a planning obligation for small applications such as this could be of benefit to the applicant (as the alternative could be a refusal of permission).</p> <p><i>The change in area I have submitted 0.5ha is purely a stab in the dark to reflect 10 dwellings.</i></p>	<p>An SPD is not permitted to amend policy in a Local Plan. As such, the adopted Local Plan policy on affordable housing thresholds continues.</p>	<p>No change</p>



	<p>I believe Whitehall guidance, possibly tested through the court procedure, recently ruled S106 should not be sought from developments of ten or more, making this unenforceable. I believe this not only affects this document but means when the core strategy is revisited the reference to 5 or more will need changing. Between now and then I would imagine under ten would be unenforceable. Many at FDC may recall this was something I campaigned hard for locally, nationally and at government level when the core strategy was being developed, resulting in FDC raising the expectation from a single dwelling to 5 or more.</p> <p>See: <a href="http://www.cambridge-news.co.uk/Cambridge-lose-200-affordable-homes-small/story-25232755-detail/story.html">http://www.cambridge-news.co.uk/Cambridge-lose-200-affordable-homes-small/story-25232755-detail/story.html</a></p>		
COM-15 Steve Count	<p>4.4 For housing schemes of 10<del>5</del> dwellings or more, affordable housing policy requirements do apply and would be expected to be provided (unless a site specific viability assessment indicates otherwise), and as such would, in the absence of any other issue, trigger the need for a S106 planning obligation.</p> <p>4.5 If affordable housing was deemed not necessary for a proposal, and all other policy matters could be resolved through conditions, then it is unlikely that a residential proposal of 10 dwellings, or potentially more, would trigger the need for a S106 planning obligation. Unfortunately, FDC cannot be more specific than this advice, as every proposal has to be considered individually, and will have its own unique issues and circumstances.</p> <p>It is unclear whether 4.5 somehow answers the viability raised in 4.4 or whether this is a stand-alone comment. If it answers the point raised it needs clarifying and would probably still be 4.4. if stand-alone it is completely contradictory to 4.4 (or at least appears to be). Additionally if stand-alone some reasoning would need to be given for when affordable housing may not be necessary.</p>	An SPD is not permitted to amend policy in a Local Plan. As such, the adopted Local Plan policy on affordable housing thresholds continues.	No change
COM-16	4.10 Where a development results in a need for new infrastructure	Suggested changes add	<b>Change</b> – insert 'to be'

Steve Count	and the ownership of the infrastructure is <b>to be</b> passed to the Council, a maintenance contribution as a one-of payment (commuted sum) to cover the physical upkeep of the facility will generally be required. This will usually be equivalent to the cost of 20 years maintenance, but may be more or less than this depending on the type of infrastructure provided	clarity.	between is and passed in the first sentence of paragraph 4.10.
COM-17 Steve Count	4.13 If pre-application discussions are not sought, infrastructure requirements will be identified when applications are submitted. With the exception of proposals listed in paragraph 4.2 (identifying when a planning obligation will not be required), planning applications may not be validated until the applicant provides a draft Heads of Terms document setting out S106 contributions that <del>he or she</del> <b>the applicant</b> believes are necessary and appropriate. An application which is subject to an agreement, unilateral or otherwise, will not be validated unless accompanied by both proof of title and undertaking by them to pay the Council's legal fees in dealing with the agreement  <b>The applicant could be a company, partnership or other as well as an individual</b>	Suggested changes add clarity	<b>Change</b> – delete 'he or she' between that and believes in the second sentence of paragraph 4.13 and replace this with 'the applicant'.
COM-18 Steve Count	4.15 Financial contributions will normally be required to be paid in full upon commencement or first occupation, or when the impacts of the development that the contribution is intended to address occur, whichever is the <b>earliest sooner</b> . However, there may be some circumstances where payments can occur in phases at different stages during development. As necessary, S106 Agreements will include trigger points for when the payment of financial contributions become due, as well as time scales for spending them for the delivery of the infrastructure. <b>Where later payments are allowed the Council must ensure sufficient security is obtained for the delivery of the whole S106 obligation amount.</b>	Suggested changes are not necessary.	No change
COM-19 Steve Count	4.19 The contributions would be pooled together, for a period of time usually up to a maximum of 10 years (preferably less), and then used to fund the infrastructure once the funds required to deliver the scheme are raised. In addition to this, where items of infrastructure, which have been made necessary by the cumulative impact of a	A change to 'will' is not likely to be appropriate in all circumstances.	No change

	series of developments, are provided before all developments have come forward, then the later developments <del>will</del> <del>may</del> still be required to contribute to the relevant proportion of the costs and expenditure.		
COM-20 Steve Count	4.22 The Council will at first seek to test the development viability by seeking other viability enhancements such as deferring or phasing contribution payments. <a href="#">The full cost of deferment or phasing to be ultimately met by the development. Where later payments are allowed the Council must ensure sufficient security is obtained for the delivery of the whole S106 obligation amount.</a> If there are still viability issues, the Council will require the submission of an 'open book' viability appraisal. Once submitted, the viability assessment will be considered and assessed by FDC and an independent viability assessor appointed by FDC, with full costs to be paid by the applicant. <a href="#">Where viability issues have been agreed and the S106 obligation lowered the developer must subsequently develop using an open book procedure. At any point in the build process, or post completion viability can be revisited and challenged at the request of FDC, with full costs to be paid by FDC. Should viability have materially changed the developer must either meet or make a financial contribution to meeting the required S106 obligations and reimburse the costs paid out by FDC.</a>	The changes are not considered either practical or lawful.	No change
COM-21 Steve Count	4.27 All financial contributions (paid to the Council in lieu of undertaking or providing infrastructure works) identified within a S106 Agreement, will normally be triggered for payment prior to the development commencing. All infrastructure works to be provided by a developer (via Section 278 or other such agreement) should be completed prior to the first occupation or first use of the development, in accordance with a scheme of works to be submitted to the Council for approval, unless otherwise agreed by the Council. <a href="#">Where later payments are allowed the Council must ensure sufficient security is obtained for the delivery of the whole financial contribution.</a>	All payments should be clearly set out in S106 Agreement and any phasing or timing of these payments should also be included. The Council always undertakes best endeavours to secure funding.	No change
COM-22 Steve Count	4.28 For large financial contributions, it may be possible to negotiate phased payments, particularly where it helps to improve scheme viability. However, this will need to be agreed by the Council. <a href="#">Where later payments are allowed the Council must ensure sufficient security</a>	All payments should be clearly set out in S106 Agreement and any phasing or timing of these	No change

	is obtained for the delivery of the whole of the financial contribution.	payments should also be included. The Council always undertakes best endeavours to secure funding.	
COM-23 Steve Count	5.1.9 In a similar way to the MTTs, when considering development proposals in towns that have Railway station, (presently March, Whittlesey and Manea), (especially larger development proposals) there will be a need to consider the contribution that the development can make towards the Fenland Rail Development Strategy.	Suggested change does not add clarity to the sentence except for grammatical error.	<b>Change-</b> Insert 'be' between will and a first sentence of paragraph 5.1.9.
COM-24 Steve Count	5.2.3 In rural areas, a village hall often serves as a hub of the local community and as such these should be preserved and enhanced where possible. In the market towns historically it was the libraries now community hubs that often serve a similar function.	Suggested changes updates current information.	<b>Change-</b> amend paragraph for improved clarity.
COM-25 Steve Count	5.2.9 Very Small Schemes: On very small scheme of 1-9 4 dwellings, no contribution will be sought	Change not appropriate.	No change
COM-26 Steve Count	5.5.2 On strategic allocations and broad locations for growth, open spaces and play areas are normally expected to be provided on site in accordance with open space standards in the Local Plan. Where justified and on smaller sites it is recognised that this is not always possible or desired. In these cases off-site provision or payment towards enhancement of existing provision would be required.	Change not appropriate and contrary to Local Plan.	No change
COM-27 Steve Count	5.5.12 The above worked example is a maximum (22%) that a developer would be expected to contribute. If, through evidence, one or more of the above open space types is shown to have capacity in the local vicinity, (local vicinity may be defined differently by FDC dependent on the provision being discussed, for example sports may be defined as Town Wide access) then a % discount, using the % in the above table, could take place (though note that FDC will normally may take up the option as set out in the Local Plan to seek a greater % for some open space types if there is evidence of a particular deficiency in one open space type and an over-provision in another).  The current position in March is clear evidence existing policies are failing. We have an under provision of certain types of open space	Suggested change does not add clarity to the paragraph.	No change

	<p>and overprovision of others. We do not want to continue further imbalance. This is why I have put if desired in 5.5.2 and ask FDC always seek a balancing payment.</p> <p>Theoretical!! Example; A significant proportion of Estover is given permanently over to sports. Someone builds next door to Estover. Developer next door argues oversupply of sports provision near their development ergo: loss of 8% sports provision. This is something no-one wants to see.</p>		
COM-28 The Abbey Group Cambridgeshire Ltd	Para 3.3 – the wording of the second sentence in relation to planning conditions is also not aligned with the NPPF (paragraphs 203-206). Conditions should not be used to enhance the quality of development unless this is required by planning policy requirements.	The Local Plan Policy LP16 (Delivering and Protecting High Quality Environment across the District) and SPD based on the policy provide sufficient policy guidance on improving quality of local environment.	No Change
COM-29 The Abbey Group Cambridgeshire Ltd	Section 4 – the threshold at which affordable housing is required is not aligned with the Planning Practice Guidance which states that no requirement is likely to be necessary for 10 or fewer dwellings.	An SPD is not permitted to amend policy in a Local Plan. As such, the adopted Local Plan policy on affordable housing thresholds continues.	No change
COM-30 The Abbey Group Cambridgeshire Ltd	Para 4.5 – it is unclear what is being said in this paragraph – is it necessary?	Paragraph 4.5 is necessary as it provides further guidance on affordable housing and therefore necessary to be included.	No change
COM-31 The Abbey Group Cambridgeshire Ltd	Para 4.10 – a 20 year maintenance period should be justified.	This is provided as guidance and this period may change depending on the infrastructure required to be maintained.	No change

COM-33 The Abbey Group Cambridgeshire Ltd	Para 4.15 – financial contributions should be sought on the basis of when the harm/impacts have been materialised – therefore they should be paid when the harm has been created. It is also suggested that the payment will be due on commencement or when the impacts occur (whichever is the sooner). It seems unlikely that the latter would pre-date the former.	The SPD has to cover most eventualities. On major developments, the impact that needed to be mitigated against may be built in later phases of development and therefore require payment then to mitigate against harmful effects rather than at the commencement of work on site.	No change
COM-34 The Abbey Group Cambridgeshire Ltd	Para 4.27 – see comments at 4.15 above.	The SPD has to cover most eventualities. On major developments, the impact that needed to be mitigated against may be built in later phases of development and therefore require payment then to mitigate against harmful effects rather than at the commencement of work on site.	No change
COM-35 The Abbey Group Cambridgeshire Ltd	Para 5.2.4 – it would be helpful to identify the likely on-site community facilities within such strategic developments.	Policies (LP-8 Wisbech, LP-9 March, LP-10 Chatteris and LP-11 Whittlesey) do provide some guidance on infrastructure needs for Strategic Allocations and Broad Locations.	No change
COM-36 The Abbey	General comment: whilst reference to S106 pooling is helpful this does not go far enough in setting out the likely pooled items. Without	Comments noted – a balance has to be reached	No change

Group Cambridgeshire Ltd	this information the SPD lacks any significant benefits and instead leaves the position subject to negotiation and uncertainty. The Council needs to lead the way in relation to this by clearly setting out the 5 contributions which are likely to be sought for any projects before the SPD is adopted. Anything other than this approach will lead to a piecemeal approach which has the potential to disbenefit developers, development and the Council. Would it not be more sensible to seek at least some CIL payments on those larger schemes and seek £0 for smaller schemes?	between providing rigid guidance and flexible guidance. We believe the SPD provides the right balance. A future IDP update will also help on this point.	
COM-37 Natural England	Natural England has no substantive comments to make on the detail provided within the SPD. We welcome the inclusion of guidance for open space provision, including reference to Natural England's Accessible Natural Greenspace Standards (ANGSt). We advise that Appendix 6 Detailed Specification for Design and Implementation of Open Space should promote the multifunctional benefits of green infrastructure including biodiversity, landscape, drainage, health and in helping to absorb increases in recreational pressure and diverting this away from more sensitive sites. Developers should be encouraged to refer to Natural England's guidance Nature Nearby - Accessible Natural Greenspace Guidance.	Comments noted.	No change
COM-38 NHS Property Services Ltd.	Wisbech – the growth planned for the town means that extra Health Capacity, particularly for Primary Care services, has very limited capacity and further capacity, including new infrastructure is likely to be required at some stage to meet the planned growth. We will do more detailed assessment with the CCG and NHSE.	Comments noted. NHS will be consulted at an early stage of detailed master planning for their input.	No change
COM-39 NHS Property Services Ltd.	March – There is some capacity in the town but enough to meet the longer term planned growth. The current arrangements of GP services in the town is currently being reviewed. There will be a need for additional capacity and infrastructure in the longer term. Again, we will do more detailed assessment with the CCG and NHSE.	Comments noted. NHS will be consulted at an early stage of detailed master planning for their input.	No change
COM-40 NHS Property Services Ltd.	Chatteris – The previous view of the former PCT was that there would be sufficient capacity within the George Clare Surgery to meet the planned growth. However this view was challenged last year by the Practice and others so we do need to review the position.	Comments noted. NHS will be consulted at an early stage of detailed master planning for their	No change

		input.	
COM-41 NHS Property Services Ltd.	Where we feel new or expanded Health infrastructure is required, the SPD does need to allow for justifiable developer contributions. We will expand on all of this in our more formal response.	Comments noted.	No change
COM-42 Cambridgeshire County Council Economy, Transport and Environment	The restrictions imposed on pooling S106 obligations will be a challenge for the District and County Council which will require robust policies and tools to be put in place to ensure that opportunities to secure funding or in-kind infrastructure necessary to mitigate new development is provided. In this regard, it is therefore imperative that the IDP is kept up-to-date and refreshed when required. This will assist, in part, in identifying which infrastructure items within the IDP should be prioritised and pooled. This is something already mentioned within the SPD, and the County Council will continue to work with the District in this process.	Comments noted.	No change
COM-43 Cambridgeshire County Council	Overall, the County Council is supportive of the proposed Developer Contributions SPD, though further strengthening of the draft document is required in certain key areas. Detailed comments are set out in the table in Appendix 1. I would highlight in particular that, given funding and demographic pressures, we need the flexibility to seek education contributions for affordable housing and strongly urge you to amend the document accordingly. There is also a need to consider healthcare in a wider context.	Comments noted.	No change
COM-44 Cambridgeshire County Council	Paragraph 2.2 - We would welcome inclusion in the updating of the IDP when FDC update this document early this year. Whilst the existing IDP adopted in February 2013 makes reference to 'Waste Collection and Disposal' in Paragraph 2.2 under the definition of what is included as 'infrastructure', it does not contain any further reference to it within the document or in the table of future projects. As such, we would like to ensure that this is covered further in the next version of the IDP linked to the emerging Developer Contributions SPD.	Comments noted.	No change
COM-45 Cambridgeshire County Council	Paragraph 3.21 - Reference is made to Section 278 Agreements being prepared, agreed and sealed by Fenland DC. This is not the case. Section 278 Agreements are prepared, agreed and sealed by the County Council. This needs to be changed and it is suggested that this section refers to the Local Highway Authority (LHA).	Cambridgeshire County Council is the Local Highway Authority. FDC should be changed to CCC.	<b>Change</b> – replace FDC with Cambridgeshire County Council in both para 3.21 and 3.22



COM-46 Cambridgeshire County Council	Paragraph 3.22 - As above - this should refer to Cambridgeshire County Council as local highways authority.	As above	As above
COM-47 Cambridgeshire County Council	Paragraph 4.2 (4th bullet point) - This states that 'planning obligations will not normally be sought from development which can be classed as a community facility itself'. As we would interpret a new Cambridgeshire County Council strategic waste facility such as a household recycling centre (HRC) to be a community facility we welcome this acknowledgement, as it would not require us to make a developer contribution. However, as our interpretation of Paragraph 4.2 has not been clarified, we would ask that FDC add a definition of a community facility into the glossary in Appendix A to include a HRC, alongside the other uses identified in Paragraph 5.2.1. It may also be useful for the reader if this definition could explain that for the purposes of the guidance the 'waste' community facilities have been separated from the other community facility uses such as libraries within the document, as their contributions are considered separately.	Sufficient guidance is provided in the SPD on community facilities which allows sufficient flexibility for the Council to request contributions where it thinks is necessary. Including a definition on community facilities may restrict Council's ability to request contributions.	No change
COM-48 Cambridgeshire County Council	Paragraph 4.10 - Talks about maintenance payments to the Council, but please add that there may also be maintenance obligations requiring payments to the County Council.	There may be occasions when maintenance payments need to be paid to the County Council.	<b>Change</b> – add (or County Council) after Council in the first sentence in paragraph 4.10.
COM-49 Cambridgeshire County Council	Paragraph 4.13 - There should be a link to FDC's pre-application 'protocol' which gives more detail on how applicant and agents can engage with this process. Linked to this, the 'pre-application protocol' should be updated to make reference to this SPD and the requirement for providing Head of Terms.	Comments noted.	No change
COM-50 Cambridgeshire County Council	Paragraph 4.22 - The County Council are pleased to see reference to early engagement on development viability, including the use of 'open-book' viability appraisals. It would be helpful also as part of the viability process that you expand on your 'viability enhancements' within paragraph 4.22 by listing other 'claw-back' interventions.	Comments noted.	No change
COM-51 Cambridgeshire	Paragraph 4.25 - With reference to outline planning permissions and associated S106s, it would be helpful if there was more explanation	This could be included in the tool, if available.	No Change

County Council	as to what will be considered within the S106 at the outline stage, specifically in relation to the use of formulae. It might also be useful if an example could be given with regard to formulae (e.g. calculating education contributions).		
COM-52 Cambridgeshire County Council	Paragraph 4.27/4.28 - This section of the document refers to 'the Council' (which we understand as this is a FDC document) but some obligations might require contributions to the County Council. Therefore, please rephrase this section to include payments to other infrastructure providers.	For clarity, it would be helpful to include 'other infrastructure providers'.	<b>Change</b> – add (or other infrastructure providers) after the word Council in the first sentence in paragraph 4.27.
COM-53 Cambridgeshire County Council	Paragraph 4.30 - Reference also needs to be made to the County Council's monitoring charges.	Comments noted.	No change
COM-54 Cambridgeshire County Council	Paragraph 4.31 - Within this sentence, after the wording 'other service providers', we suggest you insert the following '(for example Cambridgeshire County Council)'.	Comments noted.	No change
COM-55 Cambridgeshire County Council	Paragraph 5.1.2 - Please amend this paragraph to read the following "At an early stage, developers are encouraged to consult the County Council, and if necessary the Highways Agency, for advice on transport implications for their proposal including the extent of any transport assessment, and travel plan required to accompany a planning application".	Travel plan and any other requirements would be included in the discussion at an early stage.	No change
COM-56 Cambridgeshire County Council	Paragraph 5.1.5 - The decision as to what developments need to contribute to the measures set out in the relevant MTTS is determined by CCC as the LHA. The assessment as to which developments need to contribute to which measures needs to be CIL compliant.	Comments noted.	No change
COM-57 Cambridgeshire County Council	Paragraph 5.1.7 - The Councils may take the view that they will forward fund a piece of infrastructure where there is benefit in doing so but this does not remove the need for contributions from identified sites that haven't come forward at that time to be made.	Comments noted.	No change
COM-58 Cambridgeshire County Council	The County Council are supportive of the Community Services section within the draft SPD. To create a socially sustainable community, support other than infrastructure (e.g. initial running of the facility) will be needed and as long as they pass the CIL test, and	Comments noted.	No change

	should be included in contributions from developers. This could be in the form of a 'commuted sum'.		
COM-59 Cambridgeshire County Council	Paragraph 5.2.4 - An additional sentence at the end of the paragraph shall be inserted which shall read as follows "this would be determined on a site by site basis."	Paragraph does include on suitable locations. By implication this would be site by site basis.	No change
COM-60 Cambridgeshire County Council	Paragraph 5.2.7 - At the end of this paragraph the following sentence should be included: 'Further provisions on what facilities shall be required will be identified within the Councils IDP'.	This is mentioned in other sections of the SPD.	No change
COM-61 Cambridgeshire County Council	The County Council supports the references made to the County Council's Developer Contributions Guide, which is referred to as the 'County Guide' within the SPD. It might be useful to include the 'County Guide' within the glossary, including its full title.	Comments noted.	No change
COM-62 Cambridgeshire County Council	Paragraph 5.3.2 - Within this paragraph, the sentence to read as follows "Strategic Sites: On strategic allocations or broad locations for growth (i.e. 250 homes or more), Policy LP7 (Part F) of the Local Plan will apply which, in simple terms, expects provision on-site of, if justified, or a contribution to provision off-site."	Other sections of the policy may also be applicable to the proposal.	No change
COM-63 Cambridgeshire County Council	Paragraph 5.3.5 - At the end of the second sentence, the following sentence shall be inserted: "Such negotiations shall take place at the earliest opportunity."	The importance of early negotiations is highlighted in the SPD.	No change
COM-64 Cambridgeshire County Council	Paragraph 5.3.8 - The previous Education Provision SPG did not seek education contributions against affordable housing. However, with the ever increasing financial pressures we are facing, it is now necessary for new developments to make a greater contribution towards mitigating their impact. Considering all matters, we would now have to consider seeking contributions from proposed affordable dwellings. This is necessary to reflect the higher pupil yield generally arising from affordable housing. Therefore, we ask that the second bullet point (affordable housing) within this paragraph be deleted.	Agreed	<b>Change</b> – delete second bullet point on affordable housing in paragraph 5.3.8.
COM-65 Cambridgeshire County Council	The SPD needs to consider "Healthcare" in a wider context rather than just what is referred to within the Healthcare section, specifically paragraph 5.4.2. This is a simplistic view and a misunderstanding of	Comments noted.	No change

	the complex commissioning arrangements. As such, the County Council seek changes in line with the following comments.		
COM-66 Cambridgeshire County Council	Paragraph 5.4.2 - There will still be additional pressures on Healthcare services even with smaller sites. These might require the expansion of an existing facility and as such a contribution from the developer to pay for any expansion or another intervention (e.g. fit-out or an existing building) would be necessary. This is also particularly important when considering the current health profile of Fenland and the need for healthcare services. In addition the "Healthcare facility" may also provide services related to primary care but not provided or commissioned by the Practice itself, such as pharmacies and community health services. For example from October 2015 the County Council will become the commissioner for "Health Visitor Services" which are normally aligned either with Primary Care or within Children's centres. Please could Fenland DC take on board comments provided by other healthcare organisations (e.g. Cambridgeshire and Peterborough Clinical Commissioning Group, NHS Property Services, NHS England, etc.) as part of the consultation process, on the commissioning arrangements for Healthcare services and what those organisations would expect in terms on developer contributions.	Comments noted.	No change
COM-67 Cambridgeshire County Council	It is important to recognise the connection between open space and associated drainage solutions (e.g. SuDS) that may form part of the wider development. Therefore, please could this link identified within the Open Space and Play Area section, following paragraph 5.5.15, by adding the following text: "In certain circumstances it may be appropriate and acceptable to include elements of Sustainable Drainage Systems (SuDS) as part of the open space allocations and as part of the wider site development. It must be demonstrated by the developer that this is necessary and brings about best practice design creating multifunctional spaces in a safe manner, yet can still serve its intended as set out within the CIRIA SuDS Manual and SuDS guidance contained within the Flood & Water SPD".	This information is more appropriate in the Flood and Water SPD. Too detailed for this SPD.	No change
COM-68 Cambridgeshire	Paragraph 5.6.3 - Makes reference to the preparation of a Flood and Water SPD. However, explicit reference needs to be made to the	Changes will add clarity.	<b>Change</b> – add a sentence at end of

County Council	planning document being a 'countywide' Flood and Water SPD. Furthermore, reference also needs to be made to the proposed Flood and Water SPD supporting Part B of the Fenland DC's Policy LP14.		paragraph 5.6.3. to read, 'The Flood and Water SPD will be a 'countywide' document and would also support Policy LP14 part B of the Fenland Local Plan.'
COM-69 Cambridgeshire County Council	The initial running of a new leisure facility is as important, if not more so, than its maintenance. Therefore, the County Council may seek for a 'commuted sum' payable in kind for the initial running of the leisure facility. This should be reflected within this section of the SPD.	This is made clear in other sections of the SPD.	No change
COM-70 Cambridgeshire County Council	On the basis that the Developer Contributions SPD will steer developers on what obligations are likely to be required, we welcome the inclusion of 'Waste Collection and Disposal' set out within section 5.8 of the document and the reference to adopted waste planning policy. However, whilst we agree that the guidance contained within the adopted waste planning policies and the related RECAP Waste Management Design Guide SPD provide suitable guidance to avoid the need for duplication within FDC's document, we would suggest that a specific reference to Core Strategy Policies CS16 (Household Recycling Centres) and CS28 (Waste Minimisation, Re-Use, and Resource Recovery) and the RECAP Waste Management Design Guide SPD is made within the text to help signpost developers to the relevant information.	Sufficient guidance is provided in the SPD for future developers.	No change
COM-71 Cambridgeshire County Council	Paragraph 5.8.2 - It should also be noted that the two links provided in Paragraph 5.8.2 at present take you to the same Cambridgeshire County Council webpage (which does not contain either the Core Strategy or RECAP page) as it would appear that the PDF document has broken the full links where they are carried onto two lines, so this will need further investigation.	Web links appear to work.	No change.
COM-72 The Theatres Trust	Section 4.2 lists the types of developments where developer contributions would 'not normally be sought', however section 4.13 refers to the 'exceptions' listed in Section 4.2. The wording should be consistent.	Agreed the wording should be consistent.	<b>Change</b> – insert the word normally between not and be in the second sentence of paragraph 4.13.

COM-73 The Theatres Trust	Further, the document should acknowledge that s106 agreements are often used to secure a replacement or alternative community or cultural facility (including fit out), usually as part of the new mixed use development, when existing community or cultural facilities are redeveloped.	This would be considered during the negotiation of s106 agreement and if required it would be included in the agreement.	No change
COM-74 The Theatres Trust	Section 5.7 – Culture and Leisure - The Trust supports this section and funding of new and enhanced cultural and leisure facilities via developer contributions. These are important elements of a sustainable community, supporting social and cultural well-being.	Comments noted.	No change
COM-75 Church Commissioners for England	Overall we consider the SPD to be high level in its approach without explicit coverage of the level of potential developer contributions and likely costs associated with them. This is compounded by the fact that, in many cases, the level of developer contributions likely to be sought will be assessed in other documents and plans, including Supplementary Planning Documents (SPDs), the Infrastructure Delivery Plan (IDP), Market Town Transport Strategies (MTTS) and the Developer Contributions toolkit, for example. This leaves a level of uncertainty in the SPD for developers wishing to bring forward development proposals with a robust upfront development appraisal. This general observation is drawn from a more specific review of the sections of the SPD which set out the thresholds for when developer contributions will be sought, the nature of the contributions which will be sought and how the levels of contributions will be calculated (Sections 4 and 5).	Comments noted.	No change
COM-76 Church Commissioners for England	At paragraph 4.6 the SPD refers to development (other than residential) where developer contributions may be required. In this regard we make particular reference the statement that “a larger scheme with a greater impact is more likely to require a S106 planning obligation agreement.” This paragraph is considered ambiguous and will leave little clarity for developers wishing to progress upfront development appraisals for commercial and retail proposals for example.	Pre-application advice from the council is strongly encouraged (para 4.12) to determine content of s106 agreements.	No change
COM-77 Church Commissioners	At paragraph 4.8 the SPD confirms the presumption for infrastructure to be provided on-site wherever possible. If a developer is unable to provide either on or off-site improvements, a financial sum may be	The SPD provides sufficient guidance to help developers in Fenland. It	No change

<p>for England</p>	<p>paid to the Council or other infrastructure delivery partner to fund its provision. This section of the SPD also confirms the Council will carry out a regular review of the existing infrastructure provision through its IDP to determine where there are gaps in provision and where additional infrastructure is required to support new development.</p> <p>Again this highlights the lack of clarity within the SPD for developers to be able to develop reliable upfront development appraisals when bringing schemes forward. We consider that any infrastructure requirements will need to be clearly established and justified in the IDP, before the Developer Contributions SPD is adopted. This is particularly relevant where any IDP infrastructure schemes will be related to specific development sites. Paragraphs 4.16 to 4.18 of the SPD cover “Pooled Contributions” and it is stated that “in the case where the infrastructure provision applies to a distinct collection of developments, the Council may expect a contribution towards a piece of infrastructure from more than one development (but no more than 5 separate developments)”.</p>	<p>is not possible to provide all the information for the developer all the time.</p>	
<p>COM-78 Church Commissioners for England</p>	<p>We would make the point the SPD should only be seeking developer contributions where there is a justified need as a result of the proposed development. It is clear in Section 5.0 of the SPD that 250 units will be the threshold used for strategic residential developments and these will be key to delivery some of the larger infrastructure requirements in the District. Paragraph 4.23 refers to the establishment of a planning contributions tool on the Council’s website.</p> <p>On this basis we consider it is potentially premature to adopt an SPD which will be dependent on other studies. We consider the SPD needs to set out clear parameters in terms of developer contributions with a clear justification for the potential level of those contributions to enable a developer to make an informed judgement about the viability and deliverability of a scheme. Any infrastructure schemes and, potential costs associated with those schemes, identified through other plans and documents e.g. the IDP, and developer contribution</p>	<p>We have encouraged developers to seek pre-application advice from the Council. Even if all the tools were available there would still be a need to clarify with the Council as to S106 requirements.</p>	<p>No change</p>

	toolkits, should be at least prepared in draft, and subject to full public consultation prior to the adoption of the Developer Contributions SPD.		
COM-79 Church Commissioners for England	Paragraphs 4.21 and 4.22 cover viability and the Church Commissioners support the inclusion and, acknowledgment, of the importance of development viability and deliverability in the SPD. It is noted that paragraph 4.22 confirms “where all policy requirements (including infrastructure provision) will lead to a scheme being unviable contact should be made with the Council”, preferably at pre application stage. However, based on our observations on the lack of clarity within the SPD we consider the pre application viability appraisals will be difficult to prepare and reasonably relied upon by a developer.	It is up to the developer to demonstrate to the scheme is not viable taking account of all policy requirements. Developers must have this information available .	No change
COM-80 Church Commissioners for England	Paragraphs 5.1.3 to 5.1.5 confirm each market town will have a transport strategy (MTTS), to provide a five year programme of transport improvements and support the Local Transport Plan (LTP) objectives and these will inform the IDP. Related to our comments above it is considered that the Developer Contributions SPD should not be adopted until at least the relevant MTTS has been prepared in draft form and subject to consultation.	All market towns in Fenland have a current MTTS and is available to view on the Cambridgeshire County Council website (see link in para 5.1.4).	No change
COM-81 Church Commissioners for England	Paragraphs 5.4.1 and 5.4.2 recognise that healthcare facilities are private business with complicated funding mechanisms and as such it would be inappropriate for developers to make financial contributions to expand or build new facilities. The Church Commissioners support this view. However, paragraphs 5.4.4 and 5.4.5 go on to say that for very large strategic sites the Council would expect a broad concept plan to make space available for such facilities. It also states that in such cases it will requires a developer to research local capacity/ demand, and provide such evidence with a planning application or broad concept plan. We question the policy basis and justification requiring a developer to research local capacity/demand for health care and provide such evidence with a planning application or broad concept plan. We consider that this should be a matter for the LPA in consultation with the NHS etc.	Paragraph 5.4.4 is dealing with very large sites where broad concept plan would need to be included with the application. It would seem reasonable for the developer to research what community facilities are generated by the proposal and needed to be provided on site so that these can be shown on the concept plan.	No change
COM-82 Church	Paragraphs 5.7.1 to 5.7.9 confirm the Council is promoting museum/galleries, theatres / venues, cinemas, sports centres,	SPD outlines a consistent approach to providing	No change



<p>Commissioners for England</p>	<p>swimming pools, events, festivals and town centre programmes in Fenland and will seek S106 contributions in respect of culture in appropriate site specific cases. It is confirmed that on strategic allocations or equivalent (i.e. 250 homes or more) the Council will be seeking on-site provision of culture and leisure facilities in suitable locations.</p> <p>We question the relationship / distinction between Community Services (paragraphs 5.2.1 to 5.2.9) and Cultural and Leisure facilities and, the justification for the latter in particular. The SPD states the Council will be seeking on-site provision of Cultural and Leisure facilities in suitable locations. We question how this would be justified in terms of need and the tests set out in the NPPF Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended).</p>	<p>Community and Culture and Leisure facilities. It would be at pre-application or when the application is submitted that the need for facilities generated by the proposal would arise. If there is a need to provide Community and Culture and Leisure facilities on site this would be justified and would comply with CIL regulations.</p>	
<p>COM-83 Church Commissioners for England</p>	<p>Overall we consider the SPD to be high level in its approach without explicit coverage of the level of potential developer contributions and likely costs associated with them. This is compounded by the fact that in many cases the developer contributions that are likely to be sought will be assessed in other documents and plans, including SPDs, the IDP, MTTs and Developer Contributions toolkit, for example. This leaves a level of uncertainty in the SPD for developers wishing to bring forward development proposals with a robust upfront development appraisal. This general observation is drawn from a more specific review of the sections of the SPD which set out the thresholds for when developer contributions will be sought and the nature of the contributions which will be sought and how the levels of contributions will be calculated (Sections 4 and 5).</p>	<p>Comments noted.</p>	<p>No change</p>
<p>COM-84 Middle Level Commissioners</p>	<p>Maintenance Contributions</p> <p>4.11</p> <p>It is considered that the issues of funding, management and maintenance arrangements for the upkeep of the facilities, particularly those associated with flood risk/water level management including SuDS, in perpetuity must be supplied early within the planning process. This should include arrangements for adoption by any public</p>	<p>Comments noted.</p>	<p>No change</p>

	authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. Economic constraints must not be accepted as a justification for non-inclusion of such arrangements.		
COM-85 Middle Level Commissioners	<p>Procedure for Preparing and Securing Planning Obligations</p> <p>4.13 In respect of the opening sentence, further clarification is required upon how infrastructure requirements will be identified? Will the relevant stakeholder be contacted during the decision making process? How will this be included within a planning application?</p>	The infrastructure need generated by the proposal would be considered at pre-application or at application stage. At this stage appropriate stakeholders will be informed and their views taken into account when assessing infrastructure needs.	No change
COM-86 Middle Level Commissioners	<p>4.14 It is noted that the level of contribution required for off- site infrastructure will be “flexible” and thus, presumably, subject to influence by the applicant and/or his agent? Will this result in the risk of shortfalls requiring funding by other stakeholders/bodies if the required infrastructure is to be installed, or the failure to provide the infrastructure.</p>	Flexibility is provided to benefit all parties concerned. This allows for a request of infrastructure not previously considered.	No change
COM-87 Middle Level Commissioners	<p>5.6 Water Drainage, Flood Protection &amp; Energy Provision In respect of development within the Commissioners'/Boards' areas, your Council should appreciate that any contribution required by the Council for drainage/flood prevention infrastructure works covered by this section, in whatever form, will be in addition to those contributions received by the Commissioners'/Boards' from developers under the Land Drainage Act 1991 and associated byelaws. If it is found that attenuation features or improvements to the downstream channel system are required these are normally paid for by the developer(s), thus following current Government policy on these issues. Problems have previously arisen on developments which are developed piecemeal and/or by separate developers. In such cases it</p>	Comments noted	No change

	<p>has proved beneficial in the past, to have a master plan so that all parties know what is required of them.</p> <p>As a result, it is considered that the cost on the Commissioners/Boards does not really need to be accounted for within the tariff for development in terms of water level/flood risk management as there are current procedures in place for the developer to pay. As discussed in item 4.11, above, the long-term funding and maintenance of facilities not 'adopted' by an accountable body may need to be accounted for on some development, for example the use of SuDS for which there are no firm guidelines at present. Failure to do so may lead to an unacceptable burden on the ratepayer.</p>		
COM-88 Middle Level Commissioners	<p>5.6.3 This sentence should be amended to read: “... Councils and other stakeholders across Cambridgeshire are involved in the preparation of the County Councils Flood and Water SPD.....”</p>	Make changes as suggested.	<b>Change</b> – insert 'other stakeholders' between Councils and across in paragraph 5.6.3.
COM-89 Middle Level Commissioners	<p>5.6.4 In respect of the county's Flood and Water SPD this is likely to relate only to 'Major' planning applications. How will the householder and minor planning application be 'captured' in respect of water level/flood risk management facilities? In addition to the matters raised in the consultation documents, we would advise of the following, which may be beneficial in respect of related/development issues: <b>Green Infrastructure/Navigation</b> The Commissioners, in its capacity as a navigation authority, promote the navigable rivers within our area provided that they do not detrimentally affect our statutory water level/flood risk management functions and are urging the relevant neighbouring planning authorities to seriously give consideration to enhance the setting, access, use and opportunities associated with the navigable rivers and associated river corridors that pass through its area and making a positive impact on the largely rural economy and promote the district</p>	Comments noted	No change

	<p>as a tourist destination. However, the Commissioners receive no monies for the maintenance and improvement of this system and have no definitive plan or programme in respect of navigation. The extent to which the Commissioners will support the 'Fens Waterways Link' has yet to be determined. The Commissioners do not accept the figures for increased activity and tourism presented for its area in the original Bullens' project report.</p> <p><b>Partnership Working</b> The Commissioners and associated Boards are prepared to work in partnership with the local Community, private and public partners to fund and deliver water level/flood risk management schemes where there is a mutual benefit to the partners concerned.</p>		
COM-90 Parson Drove Parish Council	Parson Drove Parish Council would like to see a change to the Developer Contributions Policy currently out for consultation to include the provision of footpaths on all road frontage development in rural areas as the County Council's Highway funding for footpaths in rural areas is non-existent. The onus should not be on the Parish Council to fund footpath provision in the parishes and this could be provided by developer contributions either by direct provision or contributions to the provision of this infrastructure.	Comments noted. A blanket policy such as this would not be appropriate.	No change
COM-91 English Heritage	English Heritage supports the production of the SPD which provides an important opportunity to identify the relevance of developer contributions to protection and enhancement of Fenland's historic environment.	Comments noted	No change
COM-91 English Heritage	As a supporting document to the local plan, the SPD represents an important opportunity to achieve beneficial outcomes for the historic environment, in line with national policy and established practice. It can set out clearly the council's expectations in respect of proposals for sites where the conservation or enhancement of heritage assets is a consideration, taking forward the reference in local plan policy LP18 to planning obligations relating to the historic environment.	Comments noted	No change
COM-92 English Heritage	Section 4 provides examples of development types that may or may not attract the need for developer contributions. A requirement for a s106 agreement relating to the historic environment is, by definition,	Comments noted. As for protecting historic or other environmental character,	No change

	<p>established on a case-by-case basis, depending on the heritage interest associated with a site. It is perhaps worth noting that the developments identified in para 4.2 could, potentially, be the subject of planning obligations based on historic or other environmental character. Para 4.7 could be amended to include an additional bullet point to this effect</p>	<p>this is better done through the use of planning conditions.</p>	
COM-93 English Heritage	<p>Section 5 refers to different types of infrastructure that may be required through developer contributions. It would be appropriate to broaden this section title to 'Infrastructure and other site specific requirements'.</p>	<p>This section provides specific guidance on the requirements for different types infrastructure rather than site specific information.</p>	<p>No change</p>
COM-94 English Heritage	<p>Section 5.7 provides the opportunity to indicate the types of planning obligations that might reasonably apply to sites containing heritage assets. The title of this section could be changed to 'Culture, Leisure and Heritage'.</p> <p>We strongly advise that heritage assets should be referred to here as a potential area for developer contributions, and this may apply to a wide range of sites, potentially small as well as large. Developer contributions should tailored to the needs of the site, and its characteristics. Heritage issues could be absent from many sites; for others, resolution of highly significant heritage issues may be a fundamental consideration and a s106 agreement addressing these the key to securing an acceptable scheme. This may be especially be the case where sites contain heritage assets identified as 'at risk'.</p>	<p>Change title of this section to include heritage.</p>	<p><b>Change</b> – add heritage to the heading.</p>
COM-95 English Heritage	<p>We recommend that new paragraphs should refer to heritage assets (including archaeology) as appropriate for consideration in a s106 agreement. In order to clarify the potential circumstances in which heritage may become the topic of a planning obligation it would be helpful to include some examples. We suggest that additional text could refer, for instance, to cases requiring repair and re-use of listed buildings within a development site and/or enhancement of setting; increased public access and improved signage to heritage assets; interpretation panels/ historical information and public open days; measures for preservation or investigation and recovery of</p>	<p>Add a new paragraph in line with the comments made.</p>	<p><b>Change</b> - insert a new paragraph after 5.7.2</p>

	archaeological remains and sites; display of archaeological sites and dissemination of information for educational or research purposes. This list is by no means exhaustive but provides an indication of the type of matters to which planning obligations may be applied.		
COM-96 English Heritage	It would be helpful to point out in the document that the Historic Environment Record, held by Cambridgeshire County Council, and evidence base documents such as conservation area appraisals and management plans, should be consulted by prospective developers early on. This will help to identify the nature of mitigation and/or enhancement measures that could be applicable to a given site, including those which may be required through a planning obligation.	Add a new sentence to the new paragraph (see above) in line with the comments made	<b>Change</b> - insert a new para 5.7.2
COM-97 Environment Agency	However Environment Agency investment plans change and are updated in line with new spending rules and budgets. We may well have a need to coordinate the IDP with our works in future, particularly in Wisbech to coincide with the development of the allocation site to the west of the town. Whilst we know that the flood risk mitigation is likely to be very challenging to design and deliver in Wisbech, the use of developer contributions and agreements for off-site works is likely to form a significant part of delivering the necessary infrastructure. The Flood and Water Management SPD may form a significant part of this, along with the Level 2 SFRA for Wisbech and the site specific flood risk assessment. However, the evidence base for specific contributions does not yet exist so we have nothing more to add at this stage in the contributions SPD.	Comments noted	No change
COM-98 DLP Planning Ltd.	We would like to draw the Council's attention to the updated Planning Practice Guidance from the 28th November 2011, particularly paragraphs 12 to 24. It states at paragraph 12: <ul style="list-style-type: none"> <li>• "Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm.</li> <li>• In designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or</li> </ul>	An SPD is not permitted to amend policy in a Local Plan. As such, the adopted Local Plan policy on affordable housing thresholds continues..	No change

	<p>less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development.”</p> <p>This unequivocally states that planning obligations should not be sought for developments of less than 10 units unless designated in certain rural areas. Therefore the Council’s proposed threshold needs to be reviewed and either raised to 10 dwellings or incorporate a clear designation of areas where the 5 unit threshold will apply. This applies to both financial contributions and provision of affordable housing.</p>		
COM-99 DLP Planning Ltd.	<p>To confirm, it is clear that contributions sought must be directly related to each development and it will be necessary for financial contributions sought to be related to specific projects in order not to fall foul of the Community Infrastructure Legislation. For example it will not be possible for the Council to seek contributions for Education, the Council will need to seek contributions for specific projects in schools, such as the provision of a new school in xyz lower school, to avoid pooled obligations. This will limit the potential for small scale developments to provide financial contributions toward a large number of infrastructure requirements, as even these specific requirements will be limited to a pool of five contributions. This will lead to a complex and potentially unwieldy developer contribution system.</p>	Comments noted	No change
COM-100 DLP Planning Ltd.	<p>The Council is seeking all developer contributions to usually to be paid prior to a development commencing. This approach is considered to be flawed, development economics is usually reliant on return on capital expended and the highest level of capital outlay in a project is usually at the start with the one-off costs of setting up a site for development, ordering materials and preparing a site for construction. Therefore adding the additional costs of developer contributions prior to development commencing could have an effect on the viability of a developments viability and essentially reduce the amount of developer contributions that could be collected. It is recommended that the Council rethinks its approach to payment of developer contributions and looks to stage payments throughout the</p>	Developer contributions are subject to negotiation and timing of payments could be included in the s106 agreement.	No change

	development of a site, to assist development viability and maximise the amount of contributions that could be collected.		
COM-101 DLP Planning Ltd.	The purpose of the new Community Infrastructure Levy is to provide certainty and an advanced knowledge for developers in securing and developing sites with regard to developer contributions. It is considered that the draft Developer Contributions SPD provides no certainty or advanced knowledge of the likely financial contributions that will be required for each development opportunity. It is our opinion that figures need to be attributed to the infrastructure in order to provide developers advanced knowledge and give an increased level of certainty as to what financial contributions may be, when assessing the viability and potential of a site.	As outlined in the SPD, FDC is not introducing CIL currently due to viability. Detail costing of infrastructure, where known, will be included in the IDP.	No change
COM-102 David Wyatt	My only major concern relates to payments 4.25/4.27, with the expense for all cost to purchase land, site mobilisation costs, plus essential initial works, roads, sewers, piling and so on, to have the added penalty of S106 costs up front appears somewhat unreasonable. It stretches Cash flow and Borrowing to the limit. National companies not a problem, but smaller companies, difficult. We really should go back to payments after some income from sales has been received.	Developer contributions are subject to negotiation and timing of payments could be included in the s106 agreement.	No change
COM-103 March Parish Council	In terms of your Draft Supplementary Planning Document on Developer Contributions, it is not helpful in identifying infrastructure needs for the Infrastructure Delivery Plan along with your comments that FDC will decide whether or not to update the IDP list if it is felt any request is not realistic, reasonable or deliverable. It is not clear who the SPD is aimed at and in attempting to cover everything, it effectively covers nothing in sufficient detail to be helpful. Therefore, in the light of this, and the issues highlighted above, the town council is not able to identify specific projects at this stage. However, what I can say is that the following issues are important, and any help you can provide in ensuring provision is safeguarded through Section 106 would be most appreciated.	Comments noted. .	No change
COM-104 Whittlesey Town Council	Section 2.1 - Fenland District Council play equipment portfolio, identifies that Whittlesey only has 5 dedicated play areas where equipment is provided, Whittlesey Town Council would like to suggest	IDP would include all infrastructure requirements for the	No change



	that future S106 funding goes towards areas of social deprivation, not only play equipment but also outside gym equipment.	district.	
COM-105 Whittlesey Town Council	3.4 - We suggest the wording of 'will normally prohibit' is changed to just 'will prohibit'. The word normally is removed.	The word 'normally' is appropriately used in this context and its inclusion is essential.	No change
COM-106 Whittlesey Town Council	3.5 - We suggest the wording of 'May be able to grant planning permission' is changed to just 'be able to grant planning permission' the word 'may' is removed.	The word "may" is appropriately used in this context and there will be occasions when planning permission would not be granted.	No change
COM-107 Whittlesey Town Council	4.3 - There is a contradiction here and Whittlesey Town Council feel that each site should not be dealt with on a case by case basis as this is open to individual interpretation. We consider each site should be treated like for like, ie quantity of land equals number of dwellings.	Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.	No change
COM-108 Whittlesey Town Council	4.7 - The S106 should be applicable to the site and take into account the impact on the wider community within the town, in particular highway infrastructure, reference 5.2.5.	Comments noted.	No change
COM-109 Whittlesey Town Council	4.15 - Change of wording is required, the current wording states, 'financial contributions will normally be paid in full'. Should be amended to read 'financial contributions will be paid in full' the word normally needs removing, the paragraph should end after the word 'soon', no other wording is needed here.	The word 'normally' is appropriately used in this context and its inclusion is essential. There are occasions when payment could be phased especially on larger sites.	No change
COM-110 Whittlesey Town Council	4.29 – we request that the last line starting 'If the money is not spent.' is removed as we consider if it is a large development, this will automatically have an impact on our infrastructure ie. Schools, open spaces, highways tc	This is part of s106 agreements that in the event the money is not spent within the specified period as outlined in the	No change

		agreement for the intended purpose, the money has to be returned to the payee.	
COM-111 Whittlesey Town Council	5.1.8 – The Town Council should be consulted prior to making a decision on any rail related developer contributions. Whittlesey Town Council deem only a portion of any contributions in the future should be allocated to any rail projects.	Whittlesey Town Council is represented on the Steering Group that determine how the money is to be spent.	No change
COM-112 Whittlesey Town Council	5.2.4 – We disagree on the suggestion of 250 homes or more and the local parish council must be consulted for the provision of community facilities in suitable locations.	Parish Councils are consulted on developments within their parish. Para 5.2.4. is defining strategic sites.	No change
COM-113 Whittlesey Town Council	5.2.5 – Whittlesey Town Council request the wording of this paragraph should be amended as we do not consider up to 250 homes as a small development.	Para 5.2.5. is defining non-strategic sites i.e. less than 250 dwellings.	No change
COM-114 Whittlesey Town Council	5.3 – Do the Town Council have any input? If not why not, as we would like to be part of this consultation process. Our understanding is at the present time any education funding achieved from S106 goes into a central pot for Cambridgeshire County Council to allocate where they consider it is most appropriate.	Cambridgeshire County Council is the education authority responsible for providing schools in Fenland.	No change
COM-115 Whittlesey Town Council	Country Parks Whittlesey Town Council needs to highlight the National Standard, which identifies that there needs to be at least one accessible 20 hectare site within 2 KM of home etc, the document demonstrates S106 contribution from a development of 250 or more homes, why does this apply to March only? This contradicts the National Standards.	Comments noted. Local Plan identifies only March as a location for this provision.	No change
COM-116 Lincolnshire County Council	A long-term commitment to infrastructure investment and provision is critical to delivering economic and housing growth. The draft SPD clearly sets out information about Fenland DC's approach to developer contributions, the types of infrastructure for which physical or financial contributions may be sought and the thresholds which will be applied.	Comments noted	No change

COM-117 Lincolnshire County Council	The last sentence of the paragraph states that a sample S106 is provided at appendix C. It is however noted that this appendix provides 'Detailed Specification for Design and Implementation of Open Space'. Clarification is therefore required in terms of the information being provided both in this sentence and the appendices. Suggested Change: Review and amend paragraph 3.10 and appendices as appropriate to reflect the information being provided.	Comments noted and changes made as sample s106 agreement will be provided on the website.	<b>Change</b> – replace “in appendix C” with “on our website” in the last sentence in para 3.10.
COM-118 Lincolnshire County Council	Paragraphs 4.4 and 4.5 - This part of the document refers to seeking contributions for affordable housing including the thresholds that will apply. It will be important for FDC to ensure that such requests are in accordance with paragraphs 12 – 20 of the Planning Obligations element of the Planning Practice Guidance (PPG) which sets out circumstances where infrastructure contributions through planning obligations should not be sought from developers: <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/planning-obligations/planning-obligations-guidance/">http://planningguidance.planningportal.gov.uk/blog/guidance/planning-obligations/planning-obligations-guidance/</a> This was inserted following the Ministerial Statement by Brandon Lewis on 28 November.	An SPD is not permitted to amend policy in a Local Plan. As such, the adopted Local Plan policy on affordable housing thresholds continues.	No change
COM-119 Lincolnshire County Council	Paragraph 4.23 - The paragraph refers to an on-line tool which will help applicants identify the potential level of contributions which may be sought. Whilst it is noted that this will not provide a definitive, final answer it is considered a useful aid for applicants and their agents and as such is supported.	Comments noted	No change
COM-120 Lincolnshire County Council	This section of the SPD provides detailed information about the various types of infrastructure contributions that will be sought including the thresholds which may apply. This includes various references e.g. paragraphs 5.2.8, 5.5.13, 5.7.8 to the wording of s106 being as specific as possible. Such an approach is supported as it will assist the District Council in its compliance with the restrictions on the pooling of developer contributions which come into effect in April 2015. It will also provide transparency in terms of what contributions are being used for.	Comments noted	No change
COM-121 Lincolnshire	In some cases e.g. community facilities (5.2) and cultural facilities (5.7) there is no information about how potential contributions will be	Where there is no clear guidance this will be	No change

County Council	calculated.	determined on a case by case basis.	
COM-122 Lincolnshire County Council	Whilst it is accepted that this may be difficult due to the range of facilities which may be provided it felt that, to help developers and agents identify potential costs, consideration should be given to including the approach that will be used for undertaking calculations. Suggested Change: Provide indication of how contributions for community facilities and cultural facilities will be calculated. Alternatively if the planning tool referred to in paragraph 4.23 will contain this information provide a cross reference to this within sections 5.2 and 5.7	General guidance as to the likely contribution expected is provided in paragraphs 5.2.6 and 5.7.6.	No change
COM-123 Lincolnshire County Council	Section 5.5 refers to open space contributions. This paragraph makes reference to open space standards within the Local Plan and which are replicated on pages 20 – 22 of the SPD. Suggested Change: To avoid unnecessary duplication of the Local Plan, consider deleting the open space standards in the SPD and provide a link to the Local Plan within paragraph 5.5.1.	Some have found the inclusion helpful.	No change
COM-124 Lincolnshire County Council	This paragraph (5.7.2) refers to the potential cultural contributions which may be sought including those for public art. Whilst acknowledging the role of public art care will need to be taken when seeking such contributions. This is due to the reference in paragraph 4 of planning obligations element of the PPG which says 'Planning obligations should not be sought – on for instance, public art – which are clearly not necessary to make a development acceptable in planning terms'	Comments noted	No change
COM-125 Maxey Grounds and Co.	Whilst the research undertaken by DSP is commendable, and their methodology follows a standard template for such assessments, and I agree with their overall conclusion that CIL cannot be justified in Fenland at the present time, there are some aspects of their report I must challenge, so that it is not assumed, in relation to Affordable Housing or other developer contributions, that their specific calculations are accepted as correct or accurate. My position is that I consider they are more optimistic regarding the viability position, which I would suggest is actually worse than they conclude. My	Comments noted but not relevant to the SPD itself.	No change

	<p>reasons for reaching this conclusion are as follows.</p> <p>1. They assume in their research certain standard sizes for dwellings (Appendix III p 19 asterisk comment) and say they base their calculations as to £/sq m value on dividing the house value by this standard size. I would suggest particularly in the villages which they conclude are higher value, that the large number of 4 bed houses built in those village actually significantly exceed the assumed size (125 sq m), thus making the calculation invalid. The four market towns where there is a variety of house sizes correctly conclude that values lie generally in the range £1500 - £1750 / sq m in Wisbech and £1625 - £1875 / sq m in the other three market towns. It is my experience that values in the villages differ little from the towns, and if they slightly exceed this level is due to the larger plot size in villages. I would thus suggest that in the main values within Fenland lie within value levels 1-3 as described in the northern part and value levels 2 – 4 in the central and southern part. This is based upon my own research for viability assessments submitted and accepted by FDC S106 officers.</p>		
<p>COM-126 Maxey Grounds and Co.</p>	<p>2. The calculation assumptions in relation to development costs are similar to my own benchmarks with two main exceptions. The addition of £4500 per unit as normal site costs is insufficient – Road and sewer provision alone is likely to cost £10000 - £15000 per dwelling depending upon density (around £150000 per acre). 10% addition for external works is barely sufficient to cover driveways, garages, parking spaces, fencing and garden landscaping. There is no specific addition for service connection which is in the region of £4000 per dwelling, no allowance for the increasing costs of SUDS, most of which require specific on site storage / attenuation of rainwater on site – mostly underground at a cost of £2000 - £5000 per unit. A nominal allowance of £2000 for residual S106 payments is also insufficient – open space costs as set out in the draft SPG on their own generally exceed this level. Education costs currently being quoted can run between £7000 and £12000 per unit, plus land cost provision on larger sites. Strategic sites within the market towns also have to contribute to the other strategic infrastructure as set out in the draft</p>	<p>Comments noted but not relevant to the SPD itself.</p>	<p>No change</p>

	SPG. There the calculations in concluding no CIL can be justified, do not add back the cost of the s106 payments that will remain if CIL is not adopted, which is thus a very significant under assumption as to the costs of development, particularly strategic sites. This has a direct relationship with their ability to contribute to the proposed contributions within the SPG, without a significant reduction in the level of affordable housing required by policy. My view is that if most sites cannot afford CIL, which the report states would replace S106 contributions, then they cannot afford these contributions either.		
COM-127 Maxey Grounds and Co.	3. These points need to be highlighted in consideration of the SPG, particularly as this will have policy status after only one round of consultation and without any form of outside examination or scrutiny. The text of the report makes it clear that viability (even on their modest development cost assumptions) is challenging and in most cases a negotiation will be necessary on S106, affordable housing levels and contributions.	Comment noted	No change
COM-128 Maxey Grounds and Co.	Moving now to the main draft document, I would make the following comments. Para number quoted relates to the document numbering. 3.1 - State that there are 4 mechanisms but then go on to provide 5 bullet pointed examples	Comments noted and changes made to correct this.	<b>Change</b> – see earlier comment on the same issue
COM-129 Maxey Grounds and Co.	3.9 - The requirement of NPPF, and also the Growth and Infrastructure Act 2013 in relation to development and viability, are noted and should be stressed by way of specific footnote reference.	Not necessary	No change
COM-130 Maxey Grounds and Co.	3.10 - Reference is made to Appendix C being a sample S106. It is not; it is a specification for open space requirements. I would suggest that both a draft s106 and a draft unilateral undertaking that meet the Council's requirements are appended to the SPG document. See further below regarding Unilateral.	Comments noted and changes made to correct this.	<b>Change</b> – see earlier comment on the same issue
COM-131 Maxey Grounds and Co.	4.4 - The recent introduction by the government of relaxation of affordable housing requirements on schemes of 10 or less puts this paragraph at odds with this government policy advice. It is suggested that paras 4.3, 4.4 are amended to update them to the threshold of 11.	An SPD is not permitted to amend policy in a Local Plan. As such, the adopted Local Plan policy on affordable housing thresholds continues.	No change
COM-132	4.9 - The detail of an IDP is awaited. It is suggested that the wording	Comments noted.	No change

Maxey Grounds and Co.	of this paragraph is amended to replace “required” with “necessary” in line with the tests referred to in para 3.7		
COM-133 Maxey Grounds and Co.	4.13 - Looking at the process for dealing with the preparation of a s106 agreement, if a developer submits a unilateral undertaking there is no work that the council’s legal department needs to do. It is a complete document on its own, provided it incorporates the proof of title required. It is thus unreasonable to expect a developer to give an undertaking for legal costs on submission of an application if using a unilateral undertaking. It is similarly unreasonable to require an undertaking on costs incurred prior to grant of committee or officer approval of consent if a draft S106 agreement in a standard Council published form is submitted with an application. It is reasonable in such circumstances to require an undertaking that costs incurred after grant of consent will be met. To this end it is essential that a standard form of S106 and unilateral undertaking is made available as part of this SPG and electronically so that applications can utilise these and minimise cost risk for applications where the outcome is not certain. Given that the basis for decision making is now criteria based, with thus less certainty as to the outcome, this is only reasonable.	Comments noted. Legal fees will be subject to discussion at the time of applications. It is intention of FDC to make this process cost effective and transparent as possible.	No change
COM-134 Maxey Grounds and Co.	4.15 - The need created by an approved application is not necessarily incurred on commencement of development. I therefore object to the assumption, as drafted, that financial contributions will generally be required at commencement. The need created should be assessed, and the contribution required at such a time as to be able to fund the meeting of that need.	The paragraphs allow flexibility on payment depending on circumstances. This could be negotiated at the time signing s106 agreement.	No change
COM-135 Maxey Grounds and Co.	4.16 - The draft policy refers to an IDP which I believe is still awaited. There is danger in adopting an SPG that relies upon an as yet non-existent document for direction.	Comments noted.	No change
COM-136 Maxey Grounds and Co.	4.19 - Contributions must be fairly and directly related to the development in question. If a project is completed in a fairly short period of time I would question that if a contribution is not spent 5 years after its completion, whether the need can be said to relate fairly and reasonably to that development. To give an increased period of 10 years is not warranted. If the contribution relates to a large scheme then giving up to 3 years after completion of the	We think 10 year is sufficient given the restrictions on the s106 contributions. It may take some time for money to be gathered and to deliver necessary infrastructure.	No change

	<p>scheme will give a longer period for the use of larger contributions. I would suggest that this paragraph is amended to read “the earlier of 3 years after completion of the development for which the consent is issued and a maximum of 5 years from the date of contribution”. 5 years is the current maximum period from the date of contribution.</p>		
COM-137 Maxey Grounds and Co.	<p>4.21 - Viability assessment is covered above, and my caution about the outputs of the study is drawn to the Council’s attention.</p>	Comments noted	No change
COM-138 Maxey Grounds and Co.	<p>4.22 - The requirement for developers to pay the Council’s costs in reviewing Viability Assessments was deleted from the local plan at EIP on the clear direction of the Inspector. This provision is thus not in accordance with the Adopted Local Plan. To seek to reinsert this provision by the back door of an SPG is inappropriate, and frankly unworthy of the Council. I seek the early confirmation that this provision, being the last 9 words of this paragraph, will be removed.</p>	Comments noted and changes made in line with comments.	<b>Change</b> – delete “with full cost to be paid by the applicant” in the last sentence of paragraphs 4.22.
COM-139 Maxey Grounds and Co.	<p>4.27 - See comments relating to timing of payment and the incorrect assumption these need to be at commencement in 4.15 above.</p>	The paragraphs allow flexibility on payment depending on circumstances. This could be negotiated at the time signing s106 agreement.	No change
COM-140 Maxey Grounds and Co.	<p>4.30 - The proposed level of charge is not specified. The cost of monitoring a financial payment I would suggest is significantly less than the cost of monitoring required works. I would proposed the costs imposed should reflect this, with no cost if the payment is submitted voluntarily at the point of trigger, but added if monitoring / collection work is required.</p>	Monitoring cost is necessary to ensure s106 agreement is implemented.	No change
COM-141 Maxey Grounds and Co.	<p>5.1.9 - The wording of this paragraph suggests that payment for rail contributions are of the nature of desirable rather than essential in relation to the development. This is not in accordance with the tests outlined in 3.7. Very little development in Fenland has been located so as to make rail as a prime means of transport a possibility. I do not see how it can be assessed what use a specific development will make of rail when very little is on the doorstep of the stations. For example, if someone is driving from Wimblington to Manea Station to</p>	It is made clear only development in Manea, Whittlesey and March would be required to contribute.	No change



	commute to Cambridge are you suggesting all development in Wimblington should contribute to rail infrastructure, and how do you prove the issue of contributions to improvements at Manea is directly related to any development in Wimblington, when alternatively they may drive to March Station.		
COM-142 Maxey Grounds and Co.	5.2.1 - Similarly community services, and cultural facilities (para 5.7) need to be demonstrated as being essential and necessary for the development to be undertaken, rather than just part of a general wish list. In general at the level of contribution that can be justified / afforded will mean that pooling of more than 5 sites is likely to be necessary which breaches the pooling regulations.	General guidance as to the likely contribution expected is provided in paragraph 5.7.6.	No change
COM-144 Cannon Kirk (UK) Ltd	We recommend that a clear process for establishing where planning obligations are required is set out in the Contributions SPD and that Planning Obligations are only imposed when planning conditions that satisfy the six tests set out in paragraph 206 of the NPPF cannot be achieved.	Comments noted. FDC will adhere to requirements of NPPF	No change
COM-145 Cannon Kirk (UK) Ltd	The pooling of five s106 agreements restriction should adhered to having regards to CIL regulations in particular regulation 122.	Comments noted. FDC will adhere to requirements of CIL regulations	No change
COM-146 Cannon Kirk (UK) Ltd	Collecting contributions towards the Fenland Rail Development Strategy, it is unlikely less than 5 contributions have been collected against this item and therefore FDC need to address whether they can continue to collect contributions for this.	Contributions may be sought to pay for particular equipment or a project so that the pooling requirement does not become an issue.	No change
COM-147 Cannon Kirk (UK) Ltd	All references to the delivery of public art through planning obligations should be removed from the Contributions SPD to comply with NPPG.	Reference to public art will be deleted from para 5.7.2	<b>Change</b> – delete ‘public art’ from last sentence in paragraph 5.7.2
COM-148 Cannon Kirk (UK) Ltd	The Contributions SPD should therefore be revised to allow for viability being raised at the earliest opportunity and the reference toward an ‘open book’ approach should not require that information during the pre-application, information gathering phase.	The reference to ‘open book’ approach is in connection with viability issue and this approach will only be followed if all other viability	No change

		enhancements have not worked.	

## **Annex A - List of Organisations consulted on the; Delivering and Protecting High Quality Environments in Fenland SPD**

<b>Organisation</b>		
	Anfoss Ltd	Barker Storey Matthews
15th Wisbech Scout Group	Angles Theatre	Barton Willmore
1st March Scout Group	Anglia	Beaupre Community Primary School
1st Whittlesey Girls Brigade	Anglia Building Consultants	Benwick Parish Council
1st Whittlesey Scouts	Anglian Players	Bidwells
3D Planning	Anglian Water Services Ltd	Bidwells LLP
Abbeygate Properties	Anglian Water Services Ltd	Bidwells Property Consultants
AboveNet Communications UK Limited	Apt 6	Bidwells Property Consultants
Accent Nene	Aqua Table Tennis Club	Bloor Homes
Ace Base All Saints Primary School	Architectural Design Services	Bluebell Day Nursery
Acorn Nursery	Architectural Design Services	Bluntisham Parish Council
Adrian Parker Planning	Arqiva Communications Ltd	Bobby Scheme
AFA Associates Specialist Planning Services	Arqiva Limited	Boots The Chemists
AFA Planning Ltd	Art Architecture Ltd	Borough Council of Kings Lynn & West Norfolk
Age Concern	Arts & Health	Borough of Kings Lynn and West Norfolk
Age UK	Arts and Minds	Bournemouth & West Hampshire Water Plc
Age UK - Voluntary Visiting Scheme	Arts Development in Cambs	Bradford Cable Communications Limited
Age Well Club	Asda Stores Ltd	Bramley Line Heritage Railway Trust
Airwave Solutions Limited	AT&T Global Network Services (UK) B.V.	Bramley Line Heritage Railway Trust
Alderman Jacobs School	Atelier East	Brand Associates
Alison Harker MRICS Chartered Surveyor	Atkins	Brand Associates
All Saints Inter-Church Aided Primary School - Playgroup	Atlas Communications NI Limited	Breathe Easy Fenland
All Saints Primary School	Autumn Park Ltd	Brian Hawden and Co
allpay Limited	Axiom HA	Brimble Lea and Partners
Alzheimer's Society	Axiom Housing Association	British Horse Society
Alzheimer's Society - Chatteris Friday Group	B J Books Ltd	British Red Cross Society
Andrew Martin Associates	Barker Storey Matthews	British Telecom Plc
Andrew S Campbell Associates Ltd	Barker Storey Matthews	British Wind Energy Association

Brown & Co.	Cambridgeshire Mencap	Chatteris Museum Society
Budworth Brown	Cambridgeshire Orchard Group	Chatteris Music Society
Bumps & Beyond	Cambridgeshire Police Authority	Chatteris Neighbourhood Watch Association
Burgess Group PLC	Cambridgeshire Trading	Chatteris Rotary Club
Burrowmoor Pre-School	Cambs & Peterborough Environmental Records Centre	Chatteris St Johns Ambulance
Burrowmoor School	Cambs Fire and Rescue Service	Chatteris St Peters Tennis Club
Cable & Wireless UK	Cambs Regiment Old Comrades Association	Chatteris Tang Soo Do Club
Caldecotte Consultants	Campaign for Real Ale	Chatteris Theatre Group
Cam Sight	Campaign to Protect Rural England	Chatteris Town Band
Camargue	Cannon Kirk Homes Ltd	Chatteris Town Bowls Club
Cambridge and Huntingdon Health Authority	Care and Repair West Norfolk	Chatteris Town Council
Cambridge City Council	Care Network	Chatteris Town in Bloom
Cambridge City Council	Carter Jonas	Chatteris Unity
Cambridge Ethnic Community Forum	Cass Associates	Chatteris Womens' Institute
Cambridge Housing Society	CATS	Chatteris Womens Royal British legion
Cambridge Housing Society	Cavalry Primary School	Cheffins
Cambridge Learning - Cambridge University Press	CCORRN	Chesterton Humberts
Cambridgeshire ACRE	Centenary Baptist	Christchurch Craft Club
Cambridgeshire and P'boro Association of Local Councils	Centre for Sustainable Construction	Christchurch Garden Club
Cambridgeshire and Peterborough Clinical Commissioning Group	Chase Construction	Christchurch Parish Council
Cambridgeshire Association of Local Councils	Chatterbox	Christchurch Residents Association
Cambridgeshire Caladonian Pipe Band	Chatteris & District Ladies' Club	Churches Together
Cambridgeshire Constabulary	Chatteris & District Probus Club	Circle Housing Group
Cambridgeshire Constabulary	Chatteris Action for Youth	Citizen Advice Bureau
Cambridgeshire Constabulary Estates Department	Chatteris Community Archive	City 1st Ltd
Cambridgeshire Countryside Watch	Chatteris Community Centre	CityLink Telecommunications Limited
Cambridgeshire County Council	Chatteris Festival Committee	Civil Aviation Authority
Cambridgeshire Fire and Recsue Service	Chatteris Good Companions	Clarkson Hill Group Plc
Cambridgeshire Library Service	Chatteris Historic Festival	Clarkson Infants' School
Cambridgeshire Local Access Forum	Chatteris Morning Womens' Institute	Class Instructor Ltd

Clipper Solutions Ltd  
CMB Bowling Club  
CNSFTC  
Coates Athletic  
Coates Youth Initiative  
Cocksedge Building Contractors  
Cogent Communications UK Ltd  
Coldham Residents Action Group  
Coldham UDT FC  
College of West Anglia  
Colliers CRE  
Colne Parish Council  
COLT Telecommunications Ltd  
Come and be Heard  
Commotion Youth Group  
Construct Reason  
Construct Reason Ltd  
Contour Planning Services Ltd  
Countryside Agency  
Countryside Residential Ltd  
Coveney Parish Council  
CPRE - Cambridgeshire Branch  
Cromwell Community College  
Crowland Parish Council  
Cruse Breavement  
Cruso & Wilkin  
Cvea Logistics  
Dave J Anthony - Photography  
David Broker Design Services  
David Taylor Associates (UK) Ltd

David Walker Chartered Surveyors  
Dawbarn and Sons Ltd  
Defence Infrastructure Organisation  
DEFRA  
Delamore  
Department for Transport  
Derbyshire Gypsy Liaison Group  
Development Land and Planning Consultants  
DGM Properties Ltd  
DHIVERSE  
Dickens Watts and Dade  
Director of Joint Planning (Cambridge Growth Areas &  
Disability Cambridgeshire  
Disability Information Service  
Dive In Centre Guidenburgh Water  
DLP Planning Ltd  
Doddington Parish Council  
Doddington Recreation Field  
Doddington Under 5's Parent & Toddler Group  
Doddington United Football Club  
Doddington Village Hall management Committee  
Dolphin Telecommunications Ltd  
DPDS Consultancy Group  
Drake Towage Ltd  
Drinksense  
Drinksense (March)  
Drivers Jonas  
DTZ  
Dunhams Wood  
Dwr Cymru Cyfyngedig Welsh Water

East Cambridgeshire District Council  
Eastrea Village Hall Trust  
Easynet Telecommunications Limited  
EDF Energy  
Eircom UK Ltd  
Elm Centre  
Elm Friendship Club  
Elm Parish Council  
Elm Pre-School  
Elm Primary School  
Elm Road Primary School  
Elmside Limited  
Elmside Ltd  
Ely Diocese  
Emmanuel Church  
Emneth Parish Council  
Energis Communications Ltd  
Energis Local Access Ltd  
English Brothers Ltd  
English Heritage  
Environment Agency  
Equant UK Ltd  
Estover Playing Field Association  
EU Networks Fiber UK Limited  
Euro Payphone Ltd  
Exchange Developments Ltd  
FACET  
FACT  
Fairhurst  
Farcet Parish Council

FARICE hf.  
Farrell Bass Prichard  
Federation of Small Businesses  
Fen Ditching Company  
Fen Tigers Explorer Scout Unit  
FENDIS (Fenland Disability Sports Forum)  
Fenland 14-19 Partnership (Schools)  
Fenland African Carribean Community Association  
Fenland Arts Association  
Fenland Association for the Disabled  
Fenland Chamber of Commerce  
Fenland Citizen  
Fenland Citizen Advice Bureau  
Fenland Community Church  
Fenland Community Laundry  
Fenland Diverse Community Forum  
Fenland Furniture  
Fenland Leisure Products Ltd  
Fenland Rovers Football Team  
Fenland Running Club  
Fenland Scrapstore Ltd  
Fenland Voice  
Fenland Volunteer Bureau  
Fenland Volunteer Centre  
Fenlife Christian Church  
Fenpower/Ecogeen  
Ferry Project  
FFT Planning  
Fibernet UK Limited  
FibreSpeed Limited

Fisher Parkinson Trust  
FLAG Atlantic UK Limited  
Flagship Housing Group  
Ford and Slater  
Forest Heath District Council  
Forestry Commission  
Foster Property Developments Ltd  
Fountain Foods  
Fountain Frozen Ltd  
FPD Savills  
Framptons  
Friends of Friday Bridge School  
Friends of St Andrews Church  
Friends of St Mary's Church  
Friends of the Earth  
Friends of Wisbech Cemetery  
Friends of Wisbech Park  
Fujitsu Services Limited  
Fused Disco's  
Fusion Online Limited  
G.H. Taylor Design  
G.R.Merchant Ltd  
GC Planning Partnership  
GCE  
GCE Hire Fleet Ltd  
Gedney Hill Parish Council  
Geo Metro Limited  
Geo Networks Limited  
Geoffrey Collings and Company  
George Wimpey (East Anglia)

George Wimpey Strategic Land  
Gerald Boston Ltd  
Gerald Eve  
Gigaclear Limited  
Giles Landscapes Ltd  
Girls Venture Corps Air Cadets Wisbech  
Given Time  
GL Hearn  
Gladman Developments  
Glebelands Primary School  
Global Crossing (UK) Telecommunications Ltd  
Global Grants  
Gorefield Parish Council  
Gorefield Primary School  
Greater Cambridge Greater Peterborough Enterprise Partnership  
Greater Cambridgeshire Local Nature Partnership  
Greenwoods Solicitors LLP  
Grenadier Guards Association March Branch  
Guyhirn Fruit Farms  
Gypsy Affairs Association  
Gypsy Media Company  
H Kingham Ltd  
H L Hutchinson Ltd  
Hallam Land Management  
Halsbury Estates  
Hanson Aggregates  
Harlequin Ltd  
Harnwell Electrical Ltd  
Harringtons  
Harrison Murray

Harvey & Arnold	Independent Fibre Networks Limited	King Sturge and Co
Hastoe	Independent Town Planning Consultant	Kings Lynn & West Norfolk Borough Council
Headley Stokes	Indigo Planning Ltd	Kings Lynn and Wisbech NHS Hospital Trust
Headway Cambridgeshire	Insight Town Planning Ltd	Kingsfield Children's Centre
Heaton Planning Ltd	Internet Central Ltd	Kingsfield Pre-school
Henry H Bletsoe and Son	Interoute (i-21 Limited)	Knowles (Transport) Ltd
Hewitsons	Isle of Ely Federation of Womens Institute	L Bevens Associates
Hibernia Atlantic (UK) Limited	Isle of Ely Society for the Blind	Ladybirds Nursery
Highlands and Islands Enterprise	Ivy Leaf Tenants Association (March)	Lafarge Aggregates
Highways Agency	J & J Design on behalf of Chatteris Airfield	Lambert Smith Hampton
HMS Ganges Association	J B Turner Roses Ltd	Lancaster University Network Services Limited
Hodplan Ltd	J Hancock and Associates	Larkfleet Homes
Hodsons	James England Ltd	Lattersey Local Nature Reserve (Wildlife Trust)
Holbeach Parish Council	Januarys Consultant Surveyors	Les Stephan Planning Ltd
Home Builders Federation	Jean Jones Private Day Nursery	Level 3 Communications Ltd
Home League (Christian Programme)	Jerry H Smith Industrial Flooring	Leverington Friendship Club
Homes and Communities Agency	Jimaninos Club	Leverington Parish Council
Home-Start Fenland	Jobcentre Plus	Leverington Sports Youth FC
House Builders Federation (Eastern)	John Martin & Associates	Level Ltd
Howard Sharp and Partners	Johnson Design Practice	Lidl UK GmbH
Howard Sharp and Partners LLP	Jolliffe	Lilliput Pre-School
Humberts	Jones Day	Lincolnshire County Council
Huntingdonshire District Council	JRK & Partners Ltd	Lincolnshire Police Headquarters
Hutchinsons	JS Bloor Services Ltd	Little Downham Parish Council
Hutchinsons Planning Consultants	K L Elener Architectural Design	Living Sport
Hutchison 3G UK Limited	KCOM Group Plc	Local Enterprise Partnership
Hyde Housing	KDDI Europe Ltd	Local Generation Ltd
Hyde Housing	Kember Loudon Williams	LowC Communities Ltd
ICIS Consulting Ltd	Kidzone Child Care	M.A. Bunting Ltd Fruit Growers and Packers
In Focus Public Networks Ltd	Kier Eastern	MAGPAS The Emergency Medical Charity

Mair & Sons (Farmers) Ltd (Isle of Ely way Mill Hill)	March Museum Society	Minster General Housing Association
Malcolm Judd Partnership	March Podiatry Practice Ltd	MLL Telecom Ltd
Manea Community Primary School	March Probus Club	Mono Consultants Ltd
Manea Parish Council	March Regeneration Partnership	Mountford Pigott Partnership
Manea Village Hall	March Rotary Club	Muir
Maple Grove Infant School	March Round Table	Muir Group Housing Association
March & Chatteris Talking Newspaper Association	March Senior Citizens Club	Mums About Food CIC
March & Chatteris Youth Groups	March Shotokan Karate Club	Mundio Mobile Limited
March & District Deaf Club	March Stonecross Women's Institute	Murrow Book Café
March & District Handicapped Swimmers Club	March Tennis Club	Murrow Playgroup & After School Club
March & District Squash Club	March Town Council	Murrow Primary School
March & District Squash Rackets Club	March Town Cricket Club	Nacro
March & Fenland NCH Support Group	March Town Table Tennis League	National Grid
March and Chatteris Children Centres	March Town United Football Club	National Offenders Management Service
March Area Regeneration & Development Trust	March Trefoil Guild	National Romany Rights Association
March Athletic Club	March Wildlife Group	National Travellers Action Group
March Autistic Group	March Young Farmers Club	National Trust
March Bears Rugby Club	Marine Management Organisation	National Women's Register (Wisbech)
March Brass 2000	Martineau	NATS Mailbox 27
March Chamber of Commerce	Matrix Planning Ltd.	Natural England
March Chatteris & District Committee for Macmillan Cancer	Maxey Grounds and Co	Natural England - 4 Counties Area
March Conservative Bowling Club	Mayfair Investments	Neale Wade Community College
March Conservative Club	McCain Foods (GB) Ltd	Nene Housing Society
March Cricket Club	McCarthy and Stone	Nene Nursery School
March Deaf Club	Meadowgate Special Needs School	Neos Networks Ltd
March Evangelical Fellowship	Meadows After School Club	Nestle Purina Petcare
March GER Bowls Club	MENTER	Network Rail
March Golf Club	Mepal Parish Council	Network Rail Infrastructure Ltd
March Grammar School Old Boys Association	Middle Level Commisioners	New Homes
March Morning Women's Institute	Mike Sibthorp Planning	New Road Pre-School



NewNet plc	Park Lane Primary School	Priory Disabled Gold Academy
Newton Parish Council	Parkers Of Wisbech	Probation Office
Newton Village Hall	Parkin Planning Services	Providence Baptist Church
NHS Cambridgeshire and Peterborough Clinical Commissioning Group	Parson Drove Amenities Group 95	Quay Plumbing Centre
NHS Commissioning Board	Parson Drove Cricket Club	Ramblers Fenland Group
NHS Retirement Fellowship	Parson Drove Parish Council	Ramnoth Road Junior School
NJL Consulting	Parson Drove Street Pride Group	Ramsey Town Council
Nordelph Parish Council	PDG Architects	Reach Europe Ltd
Norfolk Constabulary	Peacock & Smith	Real Whittlesey Football Club
Norfolk County Council	Peckover Primary School	Red2Green
Norfolk Street Traders	Pegasus Planning Group	Refuge
North Level Internal Drainage Board	Persimmon Homes	Reliance FLAG Telecom Ireland Limited
North Ward Elderly Club	Persimmon Homes (East Midlands) Ltd	Religious Society of Friends (Quakers)
North West Anglia Health Care NHS Trust	Peter Humphrey Associates Ltd.	Richard Brown Planning
Northumbrian Water Limited	Peter Pan Playgroup	Robert Doughty Consultancy
NTL	Peterborough and Fenland Mind	Robert Hall Centre
NWP Street Limited	Peterborough City Council	Robinson and Hall
O2 (UK) Ltd	Peterborough Race Equality Council	Roddons Housing Association
Office of Rail Regulation	Peterborough REC	Roger Tym and Partners
Office of the Police & Crime Commissioner for Norfolk	Pick and Mix	Rose Homes
Oglesby & Limb Ltd	Pick Everard	Rosmini Centre
Old Road Securities	Pipex Internet Limited	Rotaract Club of Whittlesey
One 2 One Personal Communications Ltd	Planning & Transportation Department	Rotary Club March
Opal Telecom Limited	Planning Issues	Rotary Club of Wisbech
Orange Personal Communications Ltd	Poors Allotments Charities	Royal Air Forces Association
Orchards Primary School	Poppyfields Investments	Royal British Legion Club March
Our Lady & St Charles Church	Power House Church March	Royal British Legion(Whittlesey)
Our Lady of Good Council and St Peter	PREC	Royal Naval Association
Outwell Parish Council	Premier Choice Ltd	Roythorne and Co
Parents and Children Unite	Princes Trust	RPS

RSPB Eastern England Office	Spacelabuk	Sutton St. Edmund Parish Council
S B Components (International) Ltd	Sport England	Sutton St. James Parish Council
Sainsbury's Supermarkets Ltd	Spyder Facilities Limited	Swann Edwards Architects
Salvation Army Wisbech	SSE Telecommunications Limited	T A M Engineering
Sanctuary Housing	St Augustine's Church	Tallstead Ltd
Savills UK	St Edmundsbury District Council	Tamar Nurseries
SBM Ltd	St John Ambulance March	Tata Communications (UK) Limited
Scaldgate Club	St John Ambulance Wisbech	Taylor Vinters - Solicitors
Scott-Brown Partnership	St Mary's Church	Taylor Wimpey
Scottish Water	St Mary's Church & St Peters Church	TCI Renewables
ScottishPower Renewables	St Nicholas Church	TCI Renewables
Scout group	St Peters & St Pauls Parish Church	Tegerdine and Sons Ltd
SEARCH Architects	St Peter's School	Telecom New Zealand (UK) Licences Limited
Serious and Organised Crime Team	St Peters Wimblington P.C.C.	Telewest Limited
Severn Trent Retail Services Limited	St Wendreda's Church	TeliaSonera International Carrier UK Limited
Severn Trent Water Ltd	Status Architecture and Planning	Thames Water Utilities Ltd
Shelter	Stephen James Allen Ltd	The Barton Willmore Planning Partnership - Anglia
Silver Circle Club	Stepping Stones Nursery	The Design Partnership
Sir Harry Junior Sword Team	Stewart Ross Associates	The Design Partnership (Ely) Ltd
Sir Harry Smith Community College	Stocks AG Ltd	The Fenland Project(MIND)
Smallworld Media Communications Limited	Storeys:ssp	The Fisher Parkinson Trust Ltd
Smart Planning Ltd	Stroke co ordinator	The Foyer
Smiths Gore	Strutt and Parker LLP	The Garden House
Snowmountain Enterprises Ltd	Studio 11 Architecture	The Harbour (Whittlesey Christian Church)
Somersham Parish Council	Sugar Tub Community Centre	The Heron
South Cambridgeshire District Council	Sunlight Mind and Spirit Recovery Group	The Housing Corporation
South East Water Plc	Surf Telecoms Limited	The Inland Waterways Association
South Holland District Council	Sustrans	The Landmark Practice
South West Water Ltd	Sutton Bridge Parish Council	The Landscape Partnership
Southern Water Ltd	Sutton Parish Council	The Mobile Operators Association

The National Federation of Gypsy Liaison Groups	Truckmasters Ltd	Walsoken Parish Council
The National Trust - East of England Regional Office	Trustees of M E Pettingill	Warboys Parish Council
The Peterborough Gospel Hall Trust	Turner Contracting	Wardell Armstrong LLP
The Planning Bureau	Tweedwind Limited	Warden Housing Association Ltd
The Planning Inspectorate	Tydd St Giles Parish Council	Warren Boyes & Archer Solicitors
The Planning Law Practice	Tydd St Mary Parish Council	Well End Barn
The Ramblers Association	UK Broadband Limited	Welney Parish Council
The Robert Partnership	UK Power Networks	Wenman Design Solutions Ltd
The Salvation Army - Whittlesey-March	United Reform Church	Wessex Water Services Ltd
The Theatres Trust	United Utilities Plc	West End Preservation Society
The Village Children's Centre	Upwell Parish Council	West Norfolk & Fenland Muslim Association
The W R Davidge Planning Practice	Various Leverington Groups	West Norfolk and District Chinese Association
The Wheel Centre	Vawser and Co	West Walton Parish Council
The Wildlife Trust	Vectone Limited	West Walton Parish Council
The Wisbech Players	Veolia Water Central Ltd	Westwood Junior School
The Wisbech Society	Veolia Water East Ltd	Whaplode Parish Council
Thomas Clarkson Academy	Vergettes	What Next
Thomas Clarkson Community College	Verizon UK Ltd	White and Eddy
Thorney Parish Council	Virgin Media	Whiting & Partners
Thus plc	Virgin Media Wholesale Limited	Whittlesea Society
Tibbalds Planning and Urban Design	Vitalise	Whittlesea Society
Tingdene (MJ) Ltd	Vivien Fire Engine Trust	Whittlesea Straw Bear Festival
Tingdene Developments Ltd.	Vodafone Ltd	Whittlesey & District Business Forum
Tiscali UK Limited	Voeden Sandbrook	Whittlesey & District Crime Prevention Panel
Torch Communications Ltd	Vtesse Networks Ltd	Whittlesey & District Lions
Traditional Orchards	VTL (UK) Ltd	Whittlesey & District Tenants' Association
Traer Clark Chartered Architects	VTL Wavenet Limited	Whittlesey and District Business Forum
Transco	W A Fairhurst and Partners	Whittlesey Arts
Traveller Law Reform Project	Walpole Cross Keys Parish Council	Whittlesey Badminton Club
Trinity Methodist Church	Walpole Parish Council	Whittlesey Blue Stars Football Club

Whittlesey Business Forum  
Whittlesey Childrens Club  
Whittlesey Club for the Disabled  
Whittlesey Gardening Club  
Whittlesey Indoor Bowls Club  
Whittlesey Junior Football Club  
Whittlesey Ladysmith Women's Institute  
Whittlesey Manor Bowls Club  
Whittlesey Manor Dolphins  
Whittlesey Methodist & United Reformed Church  
Whittlesey Museum  
Whittlesey Patchwork Group  
Whittlesey Rotary Club  
Whittlesey Street Pride  
Whittlesey Tennis Club  
Whittlesey Town Bowls Club  
Whittlesey Town Council  
Whittlesey United FC  
Whittlesey Widows Contact Group  
Whittlesey Womens Institute  
Whittlesey Youth & Community Centre  
Wight Cable 2005 Ltd  
Wildfowl and Wetlands Trust Centre  
William H Brown  
Wimblington & Stonea Twinning  
Wimblington Film Club  
Wimblington Parish Council  
Wimblington St Peters Church  
Wind Direct  
WisARD

Wisbech & District Indoor Bowls  
Wisbech & District Squash Club  
Wisbech & District Talking Newspaper for the Blind  
Wisbech & Fenland Museum  
Wisbech and District Chamber of Commerce  
Wisbech Baptist Church  
Wisbech Bridge Club  
Wisbech Business & Professional Men's Club  
Wisbech Chamber of Commerce  
Wisbech Community Development Trust  
Wisbech Cycle Forum  
Wisbech Electrical  
Wisbech Fabrications Ltd  
Wisbech Furnishings  
Wisbech Grammar School  
Wisbech in Bloom  
Wisbech Job Centre  
Wisbech Lawn Tennis Club  
Wisbech Lions Club  
Wisbech Monday Club  
Wisbech Professional Development Centre  
Wisbech Roadways  
Wisbech Rose Fair  
Wisbech Round Table  
Wisbech Rugby Union Football Club  
Wisbech Self Advocacy Group  
Wisbech Social Club & Institute  
Wisbech Spiritualist Church  
Wisbech St Mary Football Clubs  
Wisbech St Mary Luncheon Club

Wisbech St Mary Parish Council  
Wisbech St Mary Short Mat Bowls Club  
Wisbech Street Pride Group  
Wisbech Talking Newspaper  
Wisbech Tenants Association  
Wisbech Tourism Development Group  
Wisbech Town Council  
Wisbech United Reform Church  
Wisbech Youth Council  
Witcham Parish Council  
Women in Rural Enterprise  
Woods Hardwick Planning  
WYG  
XcellD Ltd- Renewable Energy  
Young People of March  
Your Communications Ltd  
Youthoria

